



2023 TRIENNIAL REPORT TO THE GOVERNOR

**ON THE EFFICACY OF THE CAPACITY DEVELOPMENT
STRATEGY AND PROGRESS IN IMPROVING THE TECHNICAL,
MANAGERIAL, AND FINANCIAL CAPACITY OF
PUBLIC WATER SYSTEMS
IN THE STATE OF ILLINOIS
For Fiscal Years 2021-2023**

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PURPOSE OF THIS REPORT

This report is intended to meet the reporting requirements of Section 1420 of the federal Safe Drinking Water Act, which requires triennial reporting to the Governor on the effectiveness of Illinois' Capacity Development Strategy and progress in improving the Technical, Managerial and Financial Capacity of public water systems in Illinois.

The 1996 Safe Drinking Water Act (SDWA) required all states to develop and implement a new system's program and existing system strategy for capacity development. Subsequently, Illinois had to ensure that all new community water supplies (CWS) and all new non-transient non-community water supplies (NTNCWS) commencing operation after October 1, 1999 had adequate technical, managerial and financial (TMF) capacity before commencing operation. Illinois adopted regulations to implement this requirement, which can be found in Title 35 of the Illinois Administrative Code (ILL. ADM. CODE) Part 652 and Title 77 of the ILL. ADM. CODE Part 900.

Illinois also had to develop and implement a strategy to help all existing CWS and Non-Community Water Supplies (NCWS) achieve and maintain TMF capacity beginning October 1, 2000. Illinois submitted a Capacity Development Strategy for existing public water supplies in July 2000 to the United States Environmental Protection Agency (USEPA) and the Strategy was approved by the USEPA on September 27, 2000. Illinois submitted a Revised Capacity Demonstration Strategy in December 2022 and the final version of the strategy was approved by USEPA in May 2023.

In Illinois, the Illinois Environmental Protection Agency (ILLINOIS EPA) regulates CWS systems while the Illinois Department of Public Health (IDPH) regulates NCWS systems.

The Illinois EPA and Illinois DPH hope that by making this document available for review the public will have a better understanding of drinking water quality concerns in Illinois. Furthermore, this document is intended to meet several independent reporting requirements of the Safe Drinking Water Act (SDWA) Amendments of 1996, serve as the annual self-assessment for the Public Water System Supervision (PWSS) Grant (which should aid the U.S. EPA Region 5 in oversight of Illinois' primacy programs), as well as reporting requirements of the Illinois Environmental Protection Act (Act).

INTRODUCTION

In Illinois, regulatory oversight of public water systems (PWS)¹ is shared by the Illinois EPA and DPH. The Illinois EPA was designated as Illinois' primary enforcement authority by the U.S. EPA on August 29, 1979. The Illinois EPA, through an Intergovernmental Funding Agreement has empowered the Illinois DPH to administer the Non-Community PWS Program while the Illinois EPA retains regulatory authority over Community PWS².

The Illinois EPA regulates 1,753 active CWS. These water supplies utilize groundwater and surface water sources of potable water. At this time, 1,133 CWS use groundwater sources, 620 use surface water sources or groundwater sources under the direct influence of surface water, and 755 supplies purchase

¹ PWS serve 15 service connections or 25 residents.

² CWS serve 15 or more year-round service connections or 25 or more year-round residents.

water from other CWS. A total of 12,057,572 persons are served by those systems. Thirty five percent of the population is served by purchased surface water, two percent by purchased groundwater, and 24 percent by groundwater systems. It is worth noting that although only 26 percent of the population is served by groundwater (including purchased groundwater), groundwater dependent systems comprise almost 65 percent of the total number of CWS.

The Transient Non-Community (TNC) PWS served a population of 296,178 in 2022, while NTNC PWS served a population of 161,457. A total of 387,790 persons are served by systems using groundwater, while only 69,847 persons are served by surface water. These numbers reflect the areas where NCPWS are located predominantly in rural or non-incorporated areas where groundwater is generally available as a source of potable water.

STATUTORY BACKGROUND

The program to protect PWS in Illinois began in 1915 and has undergone considerable legal and regulatory restructuring over the years. In 1970, the General Assembly formulated the Illinois Environmental Protection Act (Act), 415 ILCS 5. The regulations governing Community Water Supplies were later adopted by the Illinois Pollution Control Board and are codified in 35 Ill. Adm. Code Subtitle F. The Illinois Groundwater Protection Act (IGPA), 415 ILCS 55/1 was adopted in 1987. Additionally, programs to protect groundwater were initiated by the Act in conjunction with “Water Quality Standards” for waters of the state that included underground water (35 Ill. Adm. Code 302). In 1991, the Illinois Pollution Control Board adopted comprehensive groundwater quality (35 Ill. Adm. Code 620).

The “core mission” of the Illinois EPA’s Division of Public Water Supplies (DPWS) is to ***assure that all persons served by community public water supplies receive water which is safe in quality, clean, adequate in quantity and of satisfactory mineral character for ordinary domestic consumption.*** To accomplish this goal, the DPWS oversees the design, construction and operation of CWS in Illinois. More specifically, the Illinois EPA must review the safety and protection of drinking water source water, implement a permitting program for the design, construction and operation of PWS treatment facilities, and maintain a surveillance program of water systems’ untreated and treated waters.

To support these activities, the DPWS has been staffed by a diverse contingent of engineers, geologist and scientist that comprise the Compliance Assurance (CAS), Field Operations (FOS), Groundwater (GWS), and Permit (PS) Sections. The DPWS is further supported by the Infrastructure and Financial Assistance Section (IFAS) of the Bureau of Water (BOW), the Division of Legal Counsel, the Division of Laboratories, the State of Illinois’ Central Management Services and Department of Innovation and Technology (DoIT).

As mentioned previously, the Illinois DPH supports the Non-Community PWS program through a series of rules including, but not limited to: the Illinois Plumbing Code (77 Ill. Adm. Code 890); the Illinois Water Well Construction Code (415 ILCS 30); the Surface Source Water Treatment Code (77 Ill. Adm. Code 930) and the Drinking Water Systems Code (77 Ill. Adm. Code 900). The Illinois DPH’s Division of Environmental Health works to reduce the incidence of disease and injury related to environmental factors that fall within five major areas of responsibility: rulemaking; plan reviews and construction permits; inspections; vocational and facility licensing; and engineering and toxicological reports.

To support these areas of responsibility within the Non-Community PWS, Illinois DPH has field staff located in the Illinois DPH’s six Regional Offices (RO) and leverages the resources of Local Health

Departments (LHD). Compliance assurance and engineering services are generally conducted by staff located in the Central Office in Springfield. Consistent with the requirements of the Safe Drinking Water Act (SDWA) program activities include sanitary surveys, water analysis and reporting; plan review; technical assistance; and training and education.

Under the SDWA and subsequent amendments, the U.S. EPA sets national limits on contaminant levels in drinking water to ensure that the water is safe for human consumption. These limits are known as Maximum Contaminant Levels (MCLs) and Maximum Residual Disinfectant Levels (MRDLs). For some regulations, treatment techniques (TT) are established in lieu of an MCL to control unacceptable levels of contaminants in water. The SDWA also requires PWS to notify their consumers when they have violated these regulations. The consumer notifications must provide an understandable explanation of the nature of the violation, its potential adverse health effects, steps that the PWS is undertaking to correct the violation and the possibility of using alternative water supplies during the violation.

Through the ongoing review of Illinois EPA's programs, the U.S. EPA has granted the Illinois EPA primary enforcement authority to determine the frequency that CWS monitor and report on the contaminants present in their water. (Generally, the larger the population served by a water system, larger the number of samples collected and the more frequent the monitoring and reporting (M&R) requirements. Additionally, the U.S. EPA supports the development of new MCLs by requiring CWS to monitor and report on currently unregulated contaminants (e.g., Unregulated Contaminant Monitoring Regulation (UCMR)). As data are acquired for these contaminants, scientific analyses are conducted to determine the need for development of new MCLs.

In 1998, the Illinois EPA began making CWS revolving loans through a partnership with the U.S. EPA and the Federal Government. Since this time, the Illinois EPA has made more than \$2.3 billion in revolving loans to water systems. This money has gone to public water supply systems around the state to maintain compliance with federal and state laws and regulations and maintain and improve the state's drinking water infrastructure.

REPORTING REQUIREMENTS

Each quarter, the Illinois EPA submits data to the Federal Safe Drinking Water Information System (SDWIS/FEDERAL), an automated database maintained by the U.S. EPA. The data submitted by Illinois include, but are not limited to the following:

- PWS inventory information;
- incidences of violations of MCLs, MRDLs, monitoring, and TT violations;
- information on enforcement activity related to these violations; and
- source water protection information.

The Illinois EPA publishes a report on its web site containing information on permits issued during the previous year. The report includes CWS construction and operating permit process including milestones that measure program efficacy.

The ICCG reports biennially to the Governor and the General Assembly on groundwater quality, quantity, and the State's enforcement efforts.

OVERVIEW OF THE PWS PROGRAMS IN ILLINOIS

Community Public Water Supply Surveillance Program

To sustain compliance with regulatory requirements and ensure the safety of Illinois CWS consumers, the Illinois EPA is committed to completing engineering evaluations (sanitary surveys) as frequently as possible. Through the DPWS' institutional knowledge, the more frequent the contact between the Illinois EPA and CWS, the higher the percentage of compliant water systems.

The focus of the Illinois EPA's inspections of CWS continues to be an evaluation of the general operation and maintenance practices at the respective systems. Inspectors evaluate state regulations under 35 Ill. Adm. Code Subtitle F and various ancillary programs that affect the CWS, such as the regulations under the Title IV: Drinking Water Security and Safety of the *Public Health Security & Bioterrorism Preparedness & Response Act of 2002* (Public Act 107-188, June 12, 2002). Fundamental aspects of these inspections also revolve around the provision of technical assistance, identification of significant deficiencies and necessary corrective actions to ensure the safety of drinking water supplies. The engineering evaluations include an on-site review of the eight components of the sanitary survey, including source, treatment, distribution system, finished water storage, pumps, monitoring & reporting, management & operation, and operator compliance assessments. The DPWS conducts surveillance and inspections at CWS from six regional offices located in Rockford, Elgin, Champaign, Springfield, Collinsville and Marion.

With assistance of national stakeholder groups, the U.S. EPA has established that over the next two-year reporting cycle, state primary enforcement programs should complete sanitary surveys at a minimum of ninety percent (90 %) of the CWS in their state on a 3-year frequency rather than the eighty percent (80%) goal from previous reporting periods. In 2022, the Illinois EPA conducted 528 sanitary surveys, which was 90% of the total systems to be inspected for 2022. For the reporting period (2020-2022), the Illinois EPA has conducted sanitary surveys at approximately 77.31% percent (1,339 of 1,753) of the CWS under its regulatory authority.

Non-Community Public Water Supply Surveillance Program

The NCPWS surveillance Program shares many commonalities with the CWS surveillance activities. Sanitary surveys are intended to review the adequacy of the water system's source of water, facilities, equipment, operation and maintenance to ensure the production and distribution of safe drinking water. Sanitary surveys for NCPWS are intended to identify and correct significant deficiencies and are conducted once every two years by the Illinois DPH or LHD field staff. Illinois DPH Field Offices are located in Rockford, Peoria, Champaign, Marion, Edwardsville and West Chicago. There are 93 LHDs throughout the State that help conduct NCPWS surveillance and perform sanitary surveys. Illinois DPH RO staff and LHD staff that perform sanitary surveys generally work in several Public Health Surveillance Programs and many times conduct multiple program inspections while visiting a NCPWS.

Illinois DPH Policy sets a goal for completing sanitary surveys once every two years. For the 2020-2023 calendar year timeframe, the Illinois DPH has conducted sanitary surveys at approximately 94.67 percent of the NTNCWS and 99.59 percent of the TNCWS under its regulatory authority.

Community Public Water Supply Compliance Assurance Program

To ensure Illinois CWS are in compliance with state and federal statutes and regulations, the Illinois Pollution Control Board (IPCB) adopts identical in substance regulatory provisions from the U.S. EPA, per Section 5/7.2 of the Act. Ensuring that CWS are in compliance with these regulations, which include MCLs in drinking water, is substantially the core mission of the Compliance Assurance Section (CAS).

Additionally, CAS coordinates technical outreach to water systems to assure proactive compliance measures are taken ahead of formal enforcement. The DPWS conducts compliance efforts for CWS from the Central Office in Springfield.

Non-Community Public Water Supply Compliance Assurance Program

Similar to the CWS compliance program, the Illinois DPH tracks water system compliance with state and federal statutes and regulations. All NCPWS are tested at least annually for total coliform bacteria and nitrate. NTNC PWS are also tested for contaminants, such as pesticides, solvents, lead and copper, arsenic, metals and disinfection byproducts. Responsibility for tracking water system compliance is shared by Regional and Central Office staff. Data tracking activities are conducted by Central Office Staff.

Community Public Water Supply Operator Certification Program

The Illinois Public Water Supply Operations Act (415 ILCS 45) establishes the statutory basis for the community water supply operator certification program in Illinois. This statute further establishes a reliable mechanism for Illinois EPA communications with CWS, ensuring that Responsible Operators in Charge (ROINC) supervise the portions of the CWS for which they are accountable, and requiring the timely submittal of information that the Illinois EPA relies upon to protect drinking water quality. Finally, this statute provides the basis for the regulatory requirements found in 35 Ill. Adm. Code Part 681. The most recent amendments to this Part became effective in 2017. The 2017 revisions to the regulation focused on further defining the experience requirements to become a licensed water supply operator in Illinois.

The Illinois EPA would also like to make note of our training partners. The operator training opportunities provided by the Environmental Resources Training Center at Southern Illinois University-Edwardsville, the Illinois Potable Water Supply Operators Association, Illinois Rural Water Association, Illinois Section of the American Water Works Association and two-year colleges are a huge factor in the successful treatment of potable water in Illinois. Whether large conferences, webinars, semester long classes, regional forums or water system specific curricula these educators, associations and individuals have afforded opportunities to water professionals in Illinois that is unparalleled across the country.

The Illinois EPA's CWS Operator Certification Program is administered by the CAS of the DPWS, and is comprised of a working supervisor and three full-time staff.

Non-Community Public Water Supply Operator Certification Program

The Illinois DPH NCPWS program administers a program to properly credential NTNC PWS from the Central Office in Springfield. The Illinois DPH uses the services of the Water Quality Association to conduct initial Operator Certification Training and administer, certification examinations. DPH's Operator Certification Program is administered by the Safe Drinking Water Program Manager and one full-time staff.

Community Public Water Supply Capacity Development Program

The Illinois EPA and DPH continue to support the Capacity Development Program and are convinced that maintaining PWS capacity is essential in operating a safe drinking water system. The original premises presented in the Illinois Capacity Development Strategy have proven accurate. Technical assistance remains the cornerstone in developing capacity in PWS that are in distress. Although the resource demands of capacity assistance are significant, Illinois continues to believe that capacity development is an integral element of the working relationship between regulatory staff and PWS officials. As such, capacity

demonstration elements will continue to be integrated into the routine activities of both Agencies in order to ensure continued progress.

It is difficult to estimate the full-time equivalents devoted to this program as it is integrated into all aspects of the drinking water program. The Capacity Development program is now managed by a Capacity Development Coordinator under the DPWS Permits Section.

Non-Community Public Water Supply Capacity Development Program

The Safe Drinking Water Program Manager coordinates Capacity Development Program activities at Illinois DPH. Currently, the Program Manager reviews new NTNC Public Water System Construction Permit Applications and performs capacity reviews on these new systems. When capacity reviews are needed at existing NTNC Public Water Systems, the Program Manager coordinates the reviews with water system personnel and RO/LHD field staff.

Cross-Connection Control Program

The Cross-Connection Control Program in Illinois is one of several tools intended to protect water consumers in the state. Statutes in Illinois establish that no person can threaten a water supply and water supply officials are responsible for protecting their water mains from connections that have the potential to allow the backflow of contaminants into their respective distribution systems (a cross-connection). Regulations have been developed and modified to outline what comprises a viable Cross-Connection Control Program.

Water supplies in Illinois have significant partners in the implementation of their Cross-Connection Control Program. While it is up to the Illinois EPA to ensure that CWS have viable programs through physical inspection of water treatment facilities and documentation reviews, the Illinois DPH deals with the plumbing aspects of the program.

The Environmental Resources Training Center located at Southern Illinois University-Edwardsville provides for the training of licensed plumbers who wish to become certified Cross-Connection Control Device Inspectors (CCCDI). While any Illinois licensed plumber can inspect plumbing, or install a backflow device or assembly, only an Illinois CCCDI can test that device or assembly. Additionally, the Illinois EPA relies upon the Environmental Resources Training Center to track and properly credential CCCDIs.

It is difficult to estimate the full-time equivalents devoted to this program as it is integrated into all aspects of the DPWS's programs. However, the Cross-Connection Control Program Coordinator position remains vacant at this time.

Groundwater and Source Water Protection Program

The Groundwater and Source Water Protection Program in Illinois is framed by Public Acts 83-1268 and 85-063, and the SDWA Section 1453. These laws amended the Act, created the Illinois Groundwater Protection Act (IGPA) 415 ILCS 55, and led to the development of IPCB regulations for groundwater quality standards and protection requirements. Further, the IGPA requires stakeholder input from the ICCG and Groundwater Advisory Council (GAC) on the development of groundwater protection programs, laws and policies. The Act was amended to require the development and implementation of a "priority" Regional Groundwater Protection Planning Program comprised of local stakeholders. In addition, the IGPA requires the ICCG to undertake a comprehensive evaluation of progress being made under these laws with biennial reporting to the Governor and General Assembly. In August of 2019, Part 604 of the Board regulations required each CWS system that treats surface or groundwater as a primary

or emergency supply of water to develop source water protection plans that must be approved by the Illinois EPA. The DPWS source water protection initiatives are generally managed from the Central Office in Springfield and the Rockford Office by the GWS of the DPWS. The DPWS source water protection initiatives are generally managed from the Central Office in Springfield and the Rockford Office by the GWS of the DPWS.

Permitting Program

Correct construction and operation of a PWS is essential for providing a safe and adequate supply of drinking water. The DPWS conducts all permitting functions for CWS from the Central Office in Springfield.

The Safe Drinking Water Program Manager conducts all permitting functions for NTNCWS from the Central Office in Springfield.

Public Water Supply Revolving Loan Program

The PWS revolving loan program is administered by the Illinois EPA's BOW-IFAS. IFAS also administers the Water Pollution Control revolving loan program. IFAS manages all aspects of the funding process with input from the DPWS. Detailed program information is available on the Illinois EPA web site at <https://www2.illinois.gov/epa/topics/grants-loans/state-revolving-fund/Pages/default.aspx>.

Generally, the first step toward the Illinois EPA working with an applicant to fund a project is the submittal of a planning report, called a "Project Plan" in Illinois' Administrative Loan Rules. An applicant must also complete a Project Planning Submittal Checklist that identifies the location of other necessary information for application processing. Once a scope of work is identified in a "Project Plan," IFAS staff will distribute the planning report to the PS and FOS for review and approval. The CAS is also consulted to ensure funding is provided to address the loan applicant's most pressing needs. Once comments from each of these Sections are received, IFAS sends a review letter requesting any additional information that is needed or answers to any questions the Illinois EPA may have. IFAS then produces a Project Summary document and the loan applicant will be required to either hold a public hearing (if the potential for environmental issues exists or if financial impacts to the loan applicant's residents are significant), or simply place an ad in the local newspaper announcing the proposed project and request for funding. The public hearing, or placement of an ad in the local newspaper, is followed by a 10-day public comment period allowing for the submission of written comments concerning the proposed project. Once the public comment period is over and IFAS receives proof of the public notification in the newspaper and any responses to any public comments, the Illinois EPA will issue Planning Approval. Planning Approval is good for five years. Therefore, once a scope of work has been identified and approved, the loan applicant can pursue funding for any portion(s) of that scope within the following five years.

The Illinois EPA's revolving loan funding process is unlike that of a bank in the respect that the Illinois EPA does not offer the funding agreement until after the recipient has demonstrated a definitive need for the project, obtained Illinois EPA Planning Approval, obtained all necessary permits, demonstrated the means and ability to repay the funding, adopted all necessary ordinances to do so and then gone out to bid on the project. Once a "winning/low" bidder is identified, the Illinois EPA can issue the Loan Agreement followed by the loan applicant entering into the contract for construction of the project. The Illinois EPA can fund the construction costs as well as planning efforts, design engineering and construction engineering/oversight. At the present time, loan applicants are anticipating a "Base" interest rate of approximately 1.4 percent for State Fiscal Year 2021. Interest rates are established each July 1 for the wastewater loan program, and the drinking water loan program, for the following 12-month period

based upon one-half of the previous 12-month mean interest rate of the 20 General Obligation Bond Buyer Index. As of July 1, 2017, loan applicants can qualify for reduced interest rates (Small Community Rate and/or Hardship Rate) based upon their service population, median household income, unemployment rate and population trends. Loan applicants qualifying for the Small Community Rate or Hardship Rate also have the option of extending the term of their loan beyond the traditional 20 years, up to a maximum of 30 years, provided the term of the loan does not exceed the useful life of the funded project. Details on the fixed loan rate of a loan agreement and repayment periods can be found within 35 Ill. Adm. Code Part 662. The BOW estimates that this program currently utilizes 17 full-time staff.

Laboratory Certification

Illinois continues to provide a Laboratory Certification Program for all regulated contaminants, to certify commercial and municipal laboratories within the State. A remote assessment of Illinois EPA's laboratory was conducted on October 26 – November 3, 2021, and an audit report was sent to the State on May 5, 2022. Illinois EPA submitted responses to the report on June 17, 2022. Full Certification was granted on May 11, 2023, after all responses were accepted, which is contingent upon the laboratory's continued demonstration of acceptable performance through the analysis of annual proficiency testing samples.

The DPH's Lab audit visit occurred July 25, 2022, and full certification was granted for microbiological analytes and methods on July 29, 2022. The next audit is scheduled for July, 2024. Illinois continues to meet the elements of its Performance Partnership Agreement (PPA) with U.S. EPA.

- Illinois continues to audit all laboratories that produce results for compliance with SDWA at least once every two years and will meet all regulatory requirements.
- Illinois EPA's Division of Laboratories maintains a certification program and a certified State Lab for inorganic and organic contaminants of concern.
- IDPH maintains a certification program and a certified State Lab for bacteriological contaminants of concern.
- Illinois EPA and DPH submit responses to annual questionnaires to U.S. EPA Region 5.
- U.S. EPA Region 5 tracks State commitments to conduct laboratory certification activities by the IDPH and the Illinois EPA's Division of Laboratories.

Compliance and Enforcement Management

Illinois EPA and IDPH maintain an adequate enforcement and compliance assistance program. Illinois EPA issues Notices of Significant Deficiencies found within thirty days of completion of a sanitary survey, to which a response in the form of a Corrective Action Plan including a compliance schedule is required. When a system fails to meet the compliance deadlines contained in a Corrective Action Plan, Illinois EPA issues a Violation Notice to the system, in accordance with Section 31 of the Illinois Environmental Protection Act, 415 ILCS 5/31 (2022). In addition, Illinois EPA issues Violation Notices upon a system accruing eleven Enforcement Target Tool points, in accordance with USEPA's 2009 Enforcement Response Policy, and when a system incurs MCL exceedance violations, two consecutive monitoring violations, a failure to issue Public Notice, Lead Consumer Notification Form, and Consumer Confidence Reports, among other violations. Once a Violation Notice has been issued, Illinois EPA enters into a Compliance Commitment Agreement that includes a schedule for returning to compliance, or makes a referral to the Office of the Illinois Attorney General for the filing of a civil complaint. Once a civil complaint has been filed, Illinois EPA works with the Attorney General's Office to obtain a Consent Order or Judgment that requires the system to return to compliance in accordance with the required actions and deadlines.

Illinois and U.S. EPA Region 5 continue to implement data exchange to ensure that enforcement resources are targeted at the non-compliant PWS. Current and historical violation data³ and follow-up enforcement actions can be found at the following web site: <http://water.epa.state.il.us/dww/index.jsp>.

The data for this reporting originates and is maintained in the Illinois Safe Drinking Water Act Information System.

Data management and reporting

Illinois EPA and IDPH maintain adequate data management systems (and updates it for new rules, and new versions of FedRep) that track requirements for all rules, which includes the appropriate combination of hardware, software, and personnel to accurately identify the inventories (including routine updates of system information), maintain water quality monitoring information, and track compliance with all M/R, MCL, MRDL, TT, PN, and public information requirements. Illinois continues to meet the elements of its PPA with U.S. EPA:

- Illinois EPA and IDPH continue to report to U.S. EPA actions and sample data quarterly and inventory data at least annually, in accordance with 40 CFR 142.15.
- Illinois EPA and IDPH utilizes SDWIS/STATE to manage water system compliance with all regulatory compliance concerns.
- U.S. EPA Region 5 tracks quarterly and annual data reporting requirements.

Operator Certification

Illinois continued to maintain regulations for the operation and maintenance of all public water systems by properly certified individuals. Illinois continues to meet the elements of its PPA with U.S. EPA:

- Illinois continues to report to U.S. EPA the status of the operator certification program on an annual basis.
- U.S. EPA Region 5 tracks completion of this report to avoid a 20 percent withholding of the Illinois Drinking Water Revolving Loan Fund grant should Illinois fail to meet this commitment.

Capacity Development

Illinois has continued to work with existing PWSs and required capacity demonstrations for new PWS to enhance water system technical, managerial, and financial capacity to operate in compliance with federal and State regulations. Illinois EPA and IDPH continue to report to U.S. EPA the status of the Illinois Capacity Development Program on an annual basis. U.S. EPA Region 5 tracks completion of this report to avoid a 20 percent withholding of the Illinois Drinking Water Revolving Loan Fund grant should Illinois fail to meet this commitment.

Source Water Assessments and Protection

Illinois has reported the number of CWSs with a Source Water Assessment Program (SWAP) report and implementation of SWAP measures electronically via SDWIS/STATE at 49.6 percent (871 of 1,757) of CWS. These systems that have SWAP source water protection minimize the risk to public health through source protection. Additionally, 72.6 percent (8,728,659 of 12,027,856) of the Illinois population served by community water systems have source water protection that have been identified in the SWAP program. In August of 2019, Part 604 of the Board regulations was approved that updated the SWAP program by requiring CWSs to prepare a Source Water Protection Plan (SWPP) that must be approved by the Illinois EPA. CWS (23 systems) serving a total population greater than 50,000 submitted their plans in 2022; CWS serving a total population greater than 5,000 (295 systems) are due to be submitted by July 26, 2023; and the remaining CWSs (761 systems) are due to be submitted by July 26, 2024. Illinois EPA anticipates that these efforts will drastically improve the percent of CWSs that have minimized risks to public health through substantial implementation of SWPP plans. Illinois CWS are required to review their SWP plans every five years or when the system makes a change to their water source. The continued updates to SWPP's will substantially protect the source water of all CWS in the State.

Reporting Requirements

Each quarter, the Illinois EPA submits data to the Federal Safe Drinking Water Information System (SDWIS/FED), an automated database maintained by the U.S. EPA. The data submitted by Illinois include,

but are not limited to the following: CWS inventory information; incidences of violations of MCLs, MRDLs, monitoring, and TT violations; information on enforcement activity related to these violations; and source water protection information. The Illinois EPA publishes a report on its website that contains information on permits issued during the previous year. The report includes CWS details regarding the construction and operating permit process, including milestones that measure program efficacy. The ICCG reports biennially to the Governor and the General Assembly on groundwater quality, quantity, and the State's enforcement efforts.

Measures and Indicators

Illinois continues to use quantitative measures developed by U.S. EPA Region 5 to regularly assess program performance. (See Appendix G) These include, but are not limited to the following activities:

- Illinois continues to participate in semi-annual conference calls with U.S. EPA Region 5 to discuss national program measures, Region 5 specific shared goals and special high priority queries.
- Illinois continues to provide information regarding lead action level exceedances upon request from U.S. EPA Region 5.
- U.S. EPA Region 5 continues to track the status of the Illinois Drinking water program with respect to national program measures, Region 5 specific shared goals and special high priority queries.
- Public health concerns related to Lead and Copper Rule (LCR) implementation will remain a high priority area of focus.

Monitoring: What We Test For—and Why

Illinois CWS are tested for different types of contaminants. The number of samples and how often the testing is done depends on the type of contaminant and other factors. The type of contaminant also determines what actions are taken if unacceptable levels are found in the water.

Acute vs. Chronic Indicators - It is important that safe drinking water be free of contamination that has the potential to cause either short-term or long-term health effects. Contaminants fall into two groups according to the health effects that they cause:

ACUTE

Acute effects occur within hours or days of the time that a person consumes a contaminant. People can suffer acute health effects from almost any contaminant if they are exposed to extraordinarily high levels (as in the case of a spill). In drinking water, microbes, such as bacteria and viruses are the contaminants with the greatest chance of reaching levels high enough to cause acute health effects. Most people's bodies can fight off these microbial contaminants the way they fight off germs, and these acute contaminants typically do not have permanent effects. Nonetheless, when high enough levels occur, they can make people ill, and can be dangerous or deadly for infants, the elderly, and persons whose immune systems are already weak due to HIV/AIDS, chemotherapy, steroid use, or other factors.

CHRONIC

Chronic effects occur after people consume a contaminant at levels over U.S. EPA's safety standards for many years. U.S. EPA develops the standards for chronic MCLs on the basis that a person may have an adverse health effect after consuming two liters of water daily over a 70-year lifetime. The drinking water contaminants that can have chronic effects are chemicals (such as disinfection by-products, solvents, and pesticides), radionuclides (such as radium), and minerals (such as arsenic). Examples of the chronic effects of drinking water contaminants are cancer, liver or kidney problems, or reproductive difficulties.

Public Water Supply Compliance Assurance Program

For calendar year 2022, 99.2 percent of the population served by CWS in Illinois receive drinking water that meets all applicable health-based drinking water standards. Also, for calendar year 2019, 96.8 percent of CWS in Illinois meet all applicable health-based drinking water standards.

Each quarter, the Illinois EPA and DPH submits data to the SDWIS/FEDERAL. The data submitted include but are not limited to: PWS inventory information; the incidences of violations of Maximum Contaminant Levels; Maximum Residual Disinfectant Levels; monitoring, and treatment technique violations; and information on enforcement activity related to these violations. This report provides the numbers of violations in each of six categories:

- 1) Maximum Contaminant Level violations;
- 2) Maximum Residual Disinfectant Level violations;
- 3) Treatment Technique requirement violations;
- 4) Significant violations of Monitoring and Reporting requirement violations;
- 5) Significant violations of the Consumer Notification requirements; and
- 6) Violations of Variances and Exemptions.

Bacterial Contamination. The coliform test is used as a general indicator of water quality in the system, in terms of potential microbial contamination. If the coliform test is negative, it is an indication that the system is adequately protected against contamination from other types of disease-causing organisms. However, if coliform bacteria are found in the water, it is assumed that the system may be compromised, and steps are taken to protect the people who use the water.

Total coliform bacteria (without the detection of fecal coliform or *E. coli*) are generally not harmful. In these cases, the system will identify the source of the contamination, correct the problem, and thoroughly disinfect its system. The public will also be notified of the situation; however, unless unusual circumstances exist to cause particular concern about the safety of the water, a boil water notice would not be issued as would be if fecal coliform or *E. coli* were found.

Nitrate/Nitrite. Community water supply systems in Illinois are tested once a year for nitrate, a chemical that may occur naturally in the environment but that can also enter the water from sources like fertilizer run-off, decaying plant and animal wastes, and sewage. Nitrate is a health concern primarily for infants under the age of six months. The infant's digestive system can convert the nitrate to nitrite, which can interfere with the ability of the infant's blood to carry oxygen. The result is a serious illness known as methemoglobinemia, or "blue baby syndrome." Methemoglobinemia can be fatal if nitrate levels in the water are high enough and the illness is not treated properly.

The MCL for nitrate in drinking water is 10 parts per million (ppm). If a water supply system exceeds the standard, the people who use the water are notified and advised not to use the water for mixing infant formula or other uses that might result in consumption of the water by infants under six months of age. The advisory is kept in place until steps can be taken to reduce nitrate levels in the water. Possible remedial measures include treating the water to remove the nitrate or drilling a new water well.

Older children and adults are generally not at risk from drinking nitrate-contaminated water. In fact, the average adult consumes about 20-25 milligrams of nitrate per day in food, primarily from vegetables. Because of changes that occur after six months of age, the digestive tract no longer converts nitrate into nitrite. However, some adults—including people with low stomach acidity and people with certain blood disorders—may still be at risk for nitrate-induced methemoglobinemia.

Inorganic Chemicals. Community water systems in Illinois are tested for 13 other inorganic chemicals in addition to nitrate. If past results don't indicate the presence of inorganic chemicals, testing is usually done once every three years, otherwise, it may be done as often as once a year. The list includes

antimony, arsenic, barium, beryllium, cadmium, chromium, cyanide, fluoride, mercury, nickel, selenium, sulfate, and thallium. In some cases, these chemicals may be naturally present in the groundwater. If a water supply system were to exceed the MCL for one of these 18 chemicals, the people who use the water would be notified, the monitoring schedule would be increased to quarterly, and appropriate steps would be taken to reduce levels of these chemicals in the water.

Radioactive Elements. Community water systems in Illinois are also usually tested once every three years, or as often as once a year, in some cases, for a list of radioactive elements. If past results don't indicate the presence of radioactive elements, testing is usually done once every nine years. If a system were to exceed the federal MCL for one of these radioactive elements, the people who use the water would be notified, the monitoring schedule would be increased to quarterly, and steps would be taken to reduce the levels of these elements in the water.

Disinfection By-Products. Disinfection rids drinking water of microbiological organisms, such as bacteria, viruses, and protozoa, that can cause and spread diseases. The most common method of disinfection is the addition of chlorine to drinking water supplies. Not only is chlorine effective against waterborne bacteria and viruses in the source water, it also provides residual protection to inhibit microbial growth after the treated water enters the distribution system. This means the disinfectant continues working to keep the water safe as it travels from the treatment plant to the consumer's tap. However, even though chlorine has been a literal lifesaver with regard to drinking water, it also has the potential to form by-products that are known to produce harmful health effects. Chlorine can combine with organic materials in the raw water to create contaminants called trihalomethanes (THMs) and haloacetic acids (HAAs). Repeated exposure to elevated levels of THMs over a long period of time could increase a person's risk of cancer. The formation of disinfection by-products is a greater concern for water systems that contain organics or use surface water, such as rivers, lakes, and streams, as their source. Surface water sources are more likely to contain the organic materials that combine with chlorine to form THMs and HAAs.

All community water systems that add a disinfectant to the water must regularly test their treated water to determine if THMs and HAAs are present. If a water supply system were to exceed the MCL for THMs or HAAs, the people who use the water would be notified, the monitoring schedule would be increased to quarterly, and appropriate steps would be taken to reduce levels of these chemicals in the water.

Lead and Copper. All community and non-transient public water systems have been tested for lead and copper. In community water systems, the water is tested in a specific number of homes within each system to determine if the water exceeds the federal "action level" of 15 parts per billion (ppb) for lead or 1,300 ppb for copper. If a system exceeds the action level for lead or copper in more than 10 percent of the locations tested, it is required to take corrective action and do further testing. Current testing frequencies are based partly on the results of that initial round of testing and of the success of subsequent efforts to reduce risk of lead contamination in systems that have previously exceeded the action level.¹⁹

Monitoring Violations for Calendar Year 2022:

The following table summarizes the number of CWS in violation with aspects of the drinking water compliance program during 2022. In the cases of a violation, a water system is required to take corrective actions. These actions include public notification to inform affected residents of the situation and if there are any special precautions they should take. In all cases noted here, residents were advised directly by the water system at the time the violation occurred. All community water systems have also noted any violations in the annual water quality reports (also called Consumer Confidence Reports) they distribute to their residents.

Information on all violations for CWSs in 2022 is in Appendices A and B, Appendices C and D for TNCWS and Appendix E and F for NTNCWS. Illinois EPA & IDPH) continue to address all systems not in compliance with state rules and regulations. Specifically, Illinois will address non-compliant PWSs that have a score of 11 or higher on the U.S. EPA’s Enforcement Targeting Tool report, in accordance with the OECA Enforcement Response Policy.

- As an enforcement option, Illinois may refer noncompliant PWSs to the U.S. EPA Region 5 for follow-up action or the Illinois Attorney General’s Office
- Illinois EPA and IDPH continue to keep records relating to enforcement decisions.
- Illinois EPA and IDPH continue to produce an annual compliance report by July 1 as part of a consolidated report program efficacy.
- U.S. EPA Region 5 track state commitments under measure SDWA02 (involving addressing with a formal enforcement action or return to compliance), the number of priority systems equal to the number of its PWSs that have a score of 11 or higher on the July Enforcement Targeting Tool report, and update Illinois quarterly.
- Illinois EPA and IDPH worked with U.S. EPA on the National Compliance Initiative (NCI).

Violations during Calendar Year 2022 Community Water Systems						
Total Number of Regulated Systems					1753	
Total Number of Systems in Violation*					385	
Total Number of Violations					1160	
Rule Subtotal by Violation Type						
Rule Category	MCLs		Treatment Techniques		Significant Monitoring Reporting	
	Number of Violations	Number of Systems*	Number of Violations	Number of Systems*	Number of Violations	Number of Systems*
Arsenic	2	2	0	0	2	2
Radiological	7	4	NA	NA	29	21
Nitrates	0	0	NA	NA	1	1
IOCs	0	0	NA	NA	0	0
SOCs	0	0	NA	NA	127	4
VOCs	0	0	NA	NA	107	6
Coliform	0	0	1	1	61	39
Ground Water Rule	NA	NA	0	0	0	0
All SWTR	NA	NA	0	0	0	0
DBPR (Stage 1) (chlorine chloramines)	NA	NA	0	0	51	44
DBPR (Stage 2)	28	14	0	0	50	25
Lead & Copper	NA	NA	28	22	122	105
Public Notice	NA	NA	NA	NA	115	63
Consumer Confidence Rule	NA	NA	NA	NA	54	52
TOTALS	37	20	29	23	550	247

	*Percentage of Systems In Compliance = 98.8%	*Percentage of Systems In Compliance = 98.6%	*Percentage of Systems In Compliance = 85.9%
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**Numbers from U.S. EPA-CDX Reporting Services. Although a CWS may be out of compliance with more than one contaminant or violation type, when calculating totals, it is counted no more than once within the population being totaled. So, the sum of NUMBER OF CWS IN VIOLATION, over the various violation types or contaminants, may not add up to the total.*

Violations during Calendar Year 2022 Non-Transient Non-Community Water Systems						
Total Number of Regulated Systems					423	
Total Number of Systems in Violation*					248	
Total Number of Violations					1728	
Rule Subtotal by Violation Type						
Rule Category	MCLs		Treatment Techniques		Significant Monitoring Reporting	
	Number of Violations	Number of Systems	Number of Violations	Number of Systems	Number of Violations	Number of Systems
Radiological	NA	NA	NA	NA	NA	NA
Arsenic	3	1	NA	NA	10	6
IOCs	0	0	NA	NA	20	3
Nitrates	1	1	NA	NA	1	1
SOCs	0	0	NA	NA	666	20
VOCs	0	0	NA	NA	777	22
Revised Total Coliform Rule	1	1	0	0	35	31
Ground Water Rule	0	0	0	0	1	1
SWTRs	0	0	0	0	0	0
DBPR (Stage 1) (chlorine chloramines)	NA	NA	9	9	8	7
DBPR (Stage 2)	0	0	0	0	0	7
Lead & Copper	NA	NA	1	1	171	137
Public Notice	NA	NA	NA	NA	73	47
Consumer Awareness	NA	NA	NA	NA	0	0
TOTALS	5	3	10	10	1713	235
	*Percentage of Systems In Compliance = 99.2%		*Percentage of Systems In Compliance = 97.6%		*Percentage of Systems In Compliance = 44.4%	

**Although a NTNCPWS may be out of compliance with more than one contaminant or violation type, when calculating totals, it is counted no more than once within the population being totaled. So, the sum of NUMBER OF NCPWS IN VIOLATION, over the various violation types or contaminants, may not add up to the total.*

Violations during Calendar Year 2022 Transient Non-Community Water Systems						
Total Number of Regulated Systems					3084	
Total Number of Systems in Violation*					521	
Total Number of Violations					653	
Rule Subtotal by Violation Type						
Rule Category	MCLs		Treatment Techniques		Significant Monitoring Reporting	
	Number of Violations	Number of Systems	Number of Violations	Number of Systems	Number of Violations	Number of Systems
Nitrates	1	1	NA	NA	12	12
Revised Total Coliform Rule	7	7	321	224	121	110
Ground Water Rule	0	0	0	0	6	6
Lead & Copper	NA	NA	0	0	3	2
Public Notice	NA	NA	NA	NA	182	159
TOTALS	8	8	321	224	324	289
	*Percentage of Systems In Compliance = 99.0%		*Percentage of Systems In Compliance = 92.7%		*Percentage of Systems In Compliance =90.6%	

**Although a TNCPWS may be out of compliance with more than one contaminant or violation type, when calculating totals, it is counted no more than once within the population being totaled. So, the sum of NUMBER OF NCPWS IN VIOLATION, over the various violation types or contaminants, may not add up to the total.*

Three-Year Summary of the Public Water Supply Loan Program (PWSLP)

The Public Water Supply Loan Program (PWSLP) is administered by the Illinois EPA's BOW-Infrastructure and Financial Assistance Section. IFAS also administers the Water Pollution Control Loan Program (WPCLP). IFAS manages all aspects of the funding process with inputs from various stakeholders (internal and external). Both loan programs provide low-interest loans through the Water Revolving Fund (WRF). These programs are annual recipients of federal capitalization funding combined with state matching funds, interest earnings, repayment money, and the sale of bonds to form a source of financing for infrastructure projects. The term "Revolving Fund" means that any interest earned, and money repaid, is put back into the program to fund additional projects and increase program outreach.

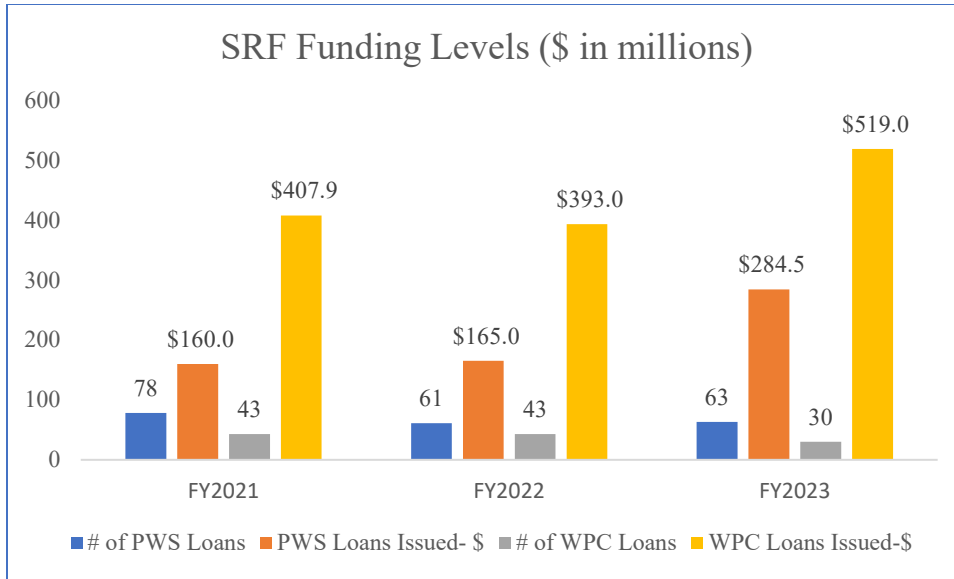
Our programs provide financial assistance to eligible public or private applicants for the design and construction of a wide variety of projects that protect or improve the quality of Illinois' water resources. The loan programs assist applicants with projects that address human health and failing water infrastructure. Eligible projects include new drinking water or wastewater infrastructure construction; upgrading or rehabilitating existing infrastructure stormwater related projects that benefit water quality; and a variety of other projects that protect or improve the quality of Illinois rivers, streams, and lakes. Our historical list of borrowers includes the state's largest city, as well as many small communities and water districts with populations less than 1,000 people.

Generally, the first step toward the Illinois EPA working with an applicant to fund a project is the submittal of a planning report, called a "Project Plan" in Illinois' Administrative Loan Rules. An applicant must also complete a Project Planning Submittal Checklist which identifies the location of other necessary information for application processing. Once a scope of work is identified in a "Project Plan," IFAS staff will distribute the planning report to the Permit Section and Field Office Staff for review and approval. Once comments from each of these Sections are received, IFAS sends a review letter requesting any additional information that is needed or answers to any questions the Illinois EPA may have. IFAS then produces a Project Summary document, and the loan applicant will be required to either hold a public hearing (if the potential for environmental issues exists or if financial impacts to the loan applicant's residents are significant), or simply place an ad in the local newspaper announcing the proposed project and request for funding. The public hearing, or placement of an ad in the local newspaper, is followed by a 10-day public comment period allowing for the submission of written comments concerning the proposed project. Once the public comment period is over and IFAS receives proof of the public notification in the newspaper and any responses to any public comments, the Illinois EPA will issue Planning Approval. Planning Approval is good for five years. Therefore, once a scope of work has been identified and approved, the loan applicant can pursue funding for any portion(s) of that scope within the following five years.

The Illinois EPA’s revolving loan funding process is unlike that of a bank in the respect that the Illinois EPA does not offer the funding agreement until after the recipient has demonstrated a definitive need for the project, obtained Illinois EPA Planning Approval, obtained all necessary permits, demonstrated the means and ability to repay the funding, adopted all necessary ordinances to do so and then gone out to bid on the project. Once a “winning/low” bidder is identified, the Illinois EPA can issue the Loan Agreement followed by the loan applicant executing the contract for construction of the project. The Illinois EPA can fund the construction costs as well as planning efforts, design engineering and construction engineering/oversight. At the present time, loan applicants are anticipating a “Base” interest rate of approximately 1.81 percent for State Fiscal Year 2024. Interest rates are established each July 1 for the wastewater loan program, and the drinking water loan program, for the following 12-month period based upon one-half of the previous 12-month mean interest rate of the 20 General Obligation Bond Buyer Index. As of July 1, 2017, loan applicants can qualify for reduced interest rates (Small Community Rate and/or Hardship Rate) based upon their service population, median household income, unemployment rate and population trends.

Below are the PWSLP funding levels from FY21-23:

	FY2021	FY2022	FY2023
# of PWS Loans Issued	78	61	63
PWS Loans Issued-\$	\$160.0M	\$165.0M	\$284.5M
# of WPC Loans Issued	43	43	30
WPC Loans Issued-\$	\$407.9M	\$393.0M	\$519.0M



The PWSLP program (along with the WPCLP) has been supplemented with the Bipartisan Infrastructure Law (BIL)/Infrastructure Investment and Jobs Act Funds (IIJA) funding in addition to the annual federal capitalization grants, received from the USEPA.

Illinois share of Infrastructure Investment and Jobs Act Funds

Year	Clean Water SRF Illinois 4.43%	Drinking Water SRF Illinois 3.69%	Total	Match	Additional Subsidy
2022	80,494,000	67,885,000	148,379,000	\$ 14,837,900	\$ 72,705,710
2023	94,270,000	63,895,000	158,165,000	\$ 15,816,500	\$ 77,500,850
2024	101,696,678	85,766,380	187,463,058	\$ 37,492,612	\$ 91,856,899
2025	110,160,821	92,904,656	203,065,477	\$ 40,613,095	\$ 99,502,084
2026	110,160,821	92,904,656	203,065,477	\$ 40,613,095	\$ 99,502,084
Total	\$496,782,321	\$403,355,691	\$900,138,012	\$149,373,202	\$441,067,626

Year	Clean Water Emerging Contaminants Illinois 4.43%	Drinking Water Emerging Contaminants Illinois 3.69%	Total	Match	Additional Subsidy
2022	4,229,000	28,505,000	32,734,000	\$ -	\$ 32,734,000
2023	9,617,000	23,186,000	32,803,000	\$ -	\$ 32,803,000
2024	9,515,250	28,505,000	38,020,250	\$ -	\$ 38,020,250
2025	9,515,250	28,505,000	38,020,250	\$ -	\$ 38,020,250
2026	9,515,250	28,505,000	38,020,250	\$ -	\$ 38,020,250
Total	\$42,391,750	\$137,206,000	\$179,597,750		\$179,597,750

Year		Drinking Water Lead Illinois 3.69%		Match	Additional Subsidy
2022		106,964,000		\$ -	\$ 52,412,360
2023		230,177,000		\$ -	\$ 112,786,730
Total		\$337,141,000			\$165,199,090

Based on the data above, it is expected that Illinois will provide \$149,373,202 in state match funding for the next 5 years as a requirement of receiving the federal capitalization grants from USEPA. This state match is an addition to the state match required for annual base federal capitalization grants the program receives from USEPA.

Lead Service Line Funding

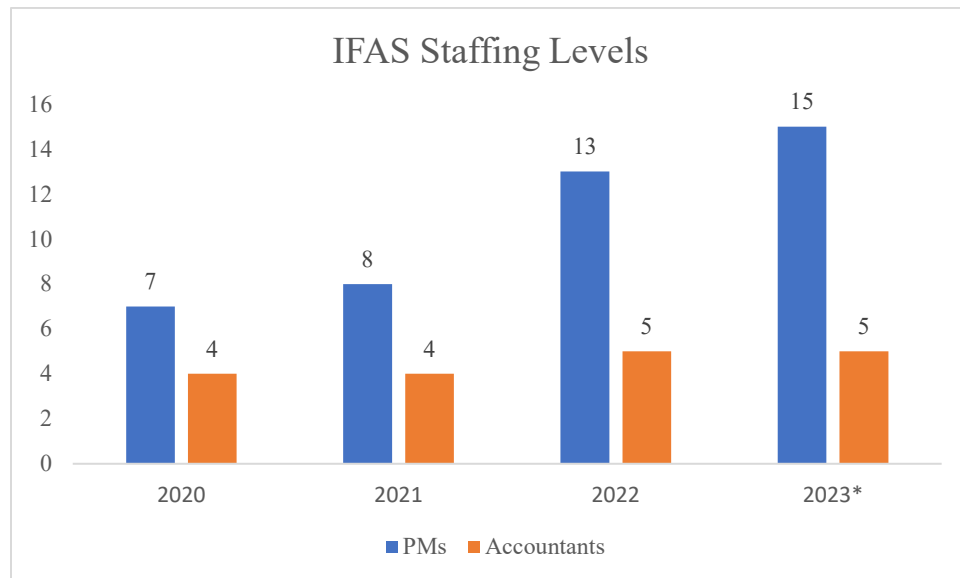
The PWSLP has been funding lead service line projects since 2017. Each year, the program has seen an increase in the number of projects requesting funding. The PWS program expects to receive \$106,964,000 in year 1 of the IJA Lead funding and \$230,177,000 in year 2. The funding amounts for Year 3-5 are to be determined as of now. 49% of this funding must be provided as principal forgiveness, meaning a portion of the loan does not have to be paid back and 51% of the funding will be issued as a loan that must be repaid back to the agency. Recently, the agency took part in developing new Administrative Rules for the Public Water Supply Loan

Program to provide funding for Lead Service Line Replacement (35 ILL. Adm. Code 663). The new rule update allows for scoring of a project based on the information from the most recent American Community Survey 5-year estimate from the US Department of Commerce, Bureau of the Census. The applicant will identify the census tract(s) of the project area from the U.S. Department of Commerce, Bureau of Census.

In 2019, Illinois EPA took advantage of the Water Infrastructure Fund Transfer Act (WIFTA), which temporarily expanded the Clean Water to Drinking SRF transfer authority specifically to address lead-related threats to public health. A total of \$107,892,848 was transferred to the PWSLP that must be provided as loans with 100% principal forgiveness for complete lead service line replacement activity. Illinois EPA has \$3,748,337 left in unspent WIFTA funds and, therefore, will add this amount to the BIL-Lead disadvantaged community principal forgiveness for FY2024.

Staffing

The IFAS unit has grown significantly in the last 4 years in terms of FTEs. As shown in the chart below, in 2020, the unit was staffed with only 11 (7-Project Managers, 4- Accountants) but in 2023 the unit is staffed with a total of 20 FTEs. The IFAS unit is well-positioned not only in its ability to process loans but also for the grant programs as well. It is a good practice to continue to assess the staffing needs of the SRF program and IFAS will continue to partake in such conversations so that the mission and the goals of the SRF program continue to be met.



The following pictures are from projects that were funded by the Water Revolving Fund:



St. Charles Red Gate Road Elevated Water Storage Tank



Water Plant Springfield, Illinois



Green Infrastructure Project, Champaign, Illinois



Water Plant Springfield, Illinois

STATE CAPACITY DEVELOPMENT STRATEGY EFFICACY AND PROGRESS

CWS

The Illinois EPA uses a combination of tools to assist existing CWS systems in acquiring and maintaining TMF capacity. These tools include engineering evaluations, enforcement actions, permit requirements for construction and operation, the Drinking Water State Revolving Fund (DWSRF), Source Water Protection Program, monitoring requirements, Operator Certification Program, cross-connection control, and technical assistance partnerships.

Technical Assistance

The Illinois EPA provides technical assistance to small and disadvantaged CWS via its field office staff and technical assistance partners such as Illinois Rural Water Association (IRWA). Illinois EPA entered into a \$250,000 contract for an initial two-year term (FY2019 and FY2020) with the Illinois Rural Water Association to assist public drinking water systems in Illinois with activities and issues including, but not limited to, technical training of staff, assistance with compliance related issues, user charge analysis, asset management activities, overall system analysis, water-loss analysis, and capacity development issues. The contract was renewed in FY2023 for five years running from July 1, 2023, through June 30, 2028, and will now be funded using the Local Assistance & Other Set Aside (\$200,000 each year). IRWA provides the Illinois EPA with statewide small systems technical assistance set-aside quarterly reports. The reports include the detailed technical, managerial, and financial capacity work completed. The contractor meets with Illinois EPA staff to determine potential public water supply systems in need of assistance. The contractor assists the small systems' staff, owners, operators, clerks, boards and council members with system improvements, loans and grant applications, rate setting, and technical, managerial, and financial matters.

Illinois EPA Field Operations Section field staff conduct periodic inspections of all CWS systems to determine if their ongoing programs for monitoring, maintaining the water supply, and providing appropriate information to the water users meets the requirements of the Illinois Pollution Control Board's (Board) public water supply regulations and related standards. Inspections are conducted for each CWS system approximately every three years with priority given to systems with a population greater than 10,000 and surface water supplies. Inspections may also be conducted to follow-up on significant deficiencies noted in the previous inspections as well as emergency situations. Across all regions of Illinois, 491 inspections were conducted in the 2023 State FY. Recently Illinois EPA field staff provided technical assistance to a CWS system that received a violation for failure to submit monthly operating reports. The system is now submitting complete reports to the Illinois EPA on time. Another example of technical assistance provided by field staff was for a CWS system struggling to obtain a certified operator. Field staff worked with the system to get an approved contract for a certified operator and worked with the new operator to develop an approvable nitrification action plan. The Illinois EPA has taken steps to have field operations staff clearly document the type of technical assistance provided during

inspections. Illinois EPA field staff routinely advise CWS systems to contact IRWA for deficiencies noted during sanitary surveys that field staff are unable to help with.

Field staff visually observe the facility and review on-site documents to evaluate the TMF capacity of existing systems. Prior to conducting a site-visit, a TMF pre-screening survey is sent to the official custodian and responsible operator in charge of each public water supply. The TMF pre-screening survey assists systems in acquiring and maintaining TMF capacity because it allows the system and inspectors to identify areas of capacity that could be improved upon. For example, in October 2022, an inspection was conducted for a small community water supply. The TMF survey indicated that the system did not have an up-to-date Cross Connection Control Survey or Emergency Operations Plan. Illinois EPA field staff discussed 35 Ill. Adm. Code Subtitle F requirements and referred the system to the IRWA website for further information. The system has since responded that the Emergency Operations Plan is in the process of being updated and the cross-connection survey was sent out February 2023. This example illustrates the success and progress Illinois EPA has had with building TMF capacity through the use of sanitary surveys, and technical assistance provided by field staff and technical assistance partners. In the past year, the Illinois EPA updated the TMF pre-screening survey to include a section on asset management and updated existing sections to include climate resiliency measures, cybersecurity measures and more. Through its contract with IRWA, Illinois EPA is providing technical assistance to small systems for the development of asset management plans. Again, this partnership with a technical assistance provider is bolstering Illinois EPA's capacity development program and efforts to build TMF capacity for the CWS who need the most assistance.

Once the engineering evaluation is complete, field staff send a non-compliance advisory letter to the CWS system notifying them that the inspection was completed and any regulatory deficiencies and/or recommendations are provided as attachments. The Illinois EPA added language to these letters recommending that systems without an asset management plan or without a plan that meets the five-core question framework begin to develop an asset management plan. The recommendation also directs systems to the Illinois EPA's recently developed webpage on asset management. CWS systems are then required to respond to deficiencies noted within 30 days. The response must detail the steps that have been or will be taken to correct these deficiencies.

If an adequate response is not received within 30 days from the date of an inspection letter, the public water supply may be added to the Restricted List for any significant deficiencies that fall under one of the following categories: maximum contaminant level violations, treatment technique violations, source water quantity requirements, treatment unit loading rates, storage volume requirements, and distribution minimum pressure requirements. If the inspection finds that the CWS system exceeds 80 percent of the rate of any of the Board or Agency's, the system will be added to the Critical Review List.

The Illinois EPA has taken steps towards utilizing the Safe Drinking Water Information System (SDWIS) to track inspection deficiencies. The Agency has trained field engineers to enter deficiencies found during site inspections into SDIWS. The Field

Operations Section enters this data into SDWIS. The Illinois EPA will use this data in the future to track the number and type of deficiencies found during engineering evaluations. The number and type of deficiencies found each year will be compared to baseline data to determine capacity trends.

Enforcement Actions

In Illinois, violations of the SDWA result in the system entering the enforcement process. The enforcement process allows the Illinois EPA to identify and address violations that are a direct result of inadequate TMF capacity. By requiring systems to address the violations, the TMF capacity of existing systems are improved. The Illinois EPA internal enforcement process escalates in an orderly fashion to ensure that notification is given to a water supplier found in violation, and that failure to correct the violation within a reasonable amount of time results in formal enforcement action. Section 31 of the Illinois Environmental Protection Act (415 ILCS 5/31) requires that CWS systems receive notification of any violations observed by representatives of the Illinois EPA within 180 days of discovery of the violation.

Actions or deficiencies that may result in enforcement actions include, but are not limited to, the following: monitoring violations, reporting violations, treatment technique violations, MCL violations, maximum residual disinfectant level violations, permit violations, any operational issues that lead to immediate short-term health threats, and lack of a certified operator. Other deficiencies found during site-inspections or permit section investigations may also result in the enforcement process if not corrected. All enforcement actions are tracked using the State's Master Notice of Violation (NOV) Database. A list of violation notices and descriptions of the violations issued in State FY 2023 are shown in Table B of this report.

DWSRF

Illinois continues to work to capitalize the DWSRF for communities in need of financial capacity assistance. Providing low-interest loans to public water systems allows them to have the financial capacity to make necessary improvements to infrastructure and ensure compliance with drinking water regulations. For State FY 2023 the Illinois EPA issued approximately \$338,426,372 in loans from the Public Water Supply Loan Program (PWSLP) of which approximately \$53,965,289 went to loan applicants, in the form of principal forgiveness, who qualified for lead service line replacement funding, and \$339,433 went to loan applicants who qualified for the "small system compliance assistance principal forgiveness". The small system compliance assistance principal forgiveness was made available to CWS systems with a health-based maximum contaminant level violation. Eligible projects must result in the system with a history of health-based violations returning to compliance and must meet the following requirements: have an enforcement action initiated by the Illinois EPA; a population with a median household income below the State average median household income; and must serve fewer than 1,500 customers.

Pursuant to 35 Ill. Adm. Code 662.130, public water supplies are ineligible for financial assistance under the PWSLP if they lack the technical, financial, and managerial capability to ensure compliance with the requirements of SDWA, unless the assistance will ensure compliance. The DWSRF program is an essential tool for systems to have the financial means to achieve adequate technical capacity. Pursuant to 35 Ill. Adm. Code 662.345, loan projects can be given additional priority points if the project includes the consolidation of two systems, removes applicants from the Restricted Status/Critical Review List, remedies health violations, or replaces lead service lines. Priority points are also given to applicants who are developing or implementing a source water protection plan or asset management plan.

The PWSLP also can offer a reduction to the amount of principal that an applicant would otherwise need to repay for its project. This reduction is called “principal forgiveness” per federal statute. Principal forgiveness functions much like a grant where the eligible capital costs of the project are reduced by the principal forgiveness amount, thereby eliminating a portion of the principal (and interest) that the borrower must repay. For State FY 2023 the Illinois EPA offered four types of principal forgiveness: Lead Service Line Replacement, Disadvantaged Community Principal Forgiveness, Small System Compliance Assistance Principal Forgiveness, and One Well Critical Review Principal Forgiveness. The DWSRF program and principle forgiveness are an integral tool in building capacity development and making progress with TMF capacity for Illinois’ CWS.

Permit Requirements for Construction and Operation

Illinois has had a water supply permit program for many years, even prior to the creation of the Illinois EPA in 1970, under the Board of Health. Currently, the Illinois EPA issues construction and operating permits for CWS systems. Pursuant to 35 Ill. Adm. Code 602.200(a), a person must not cause or allow the construction of any new CWS installation, or cause or allow the change of or addition to any existing CWS, without a construction permit issued by the Illinois EPA. 35 Ill. Adm. Code 602.200(b) specifies changes that require a permit, which include any alternations that may affect the sanitary quality, mineral quality or adequacy of CWS systems, adding new chemicals or points of application to the treatment process, and rehabilitating a water main using a liner.

The permit program allows Illinois EPA to ensure that adequate technical and managerial capacity is provided for new and improved community water systems. Existing systems must show that proposed improvements meet the requirements of 35 Ill. Adm. Code Part 604. This documentation includes confirmation of back-up power, adequate capacity to meet maximum daily demand, that finished water meets the requirements of 35 Ill. Adm. Code Part 611, and more. All new public water supplies must demonstrate technical, financial and managerial capacity to ensure compliance with drinking water standards pursuant to 35 Ill. Adm. Code 652.300. The documents in the capacity demonstration included, but are not limited to, personnel organizational charts, an operation management plan, and emergency management plan.

Source Water Protection Program

The Illinois EPA has implemented a source water assessment program (SWAP) to assist with wellhead and watershed protection of public drinking water supplies. Illinois SWAP activities are divided into the following areas: community surface water supplies, non-community surface water supplies, community groundwater supplies, Lake Michigan supplies, non-community groundwater supplies, and mixed ground and surface water community water supplies. Assessments have been conducted for all public water supplies in Illinois, including approximately 1,800 community water supplies. In addition, more than 4,100 non-community water supplies have been assessed.

SWAPs will help communities make important decisions about how to protect their drinking water by working to ensure safe drinking water supplies, the health and economy of the community, as well as the preservation of natural resources. In addition, investments in drinking water treatment will be sustained for a longer period of time. In 2019, 35 Ill. Adm. Code Part 604 of the Board regulations required each CWS system that treats surface or groundwater as a primary or emergency supply of water to develop source water protection plans (SWPP) that must be approved by the Illinois EPA.

Last year, 27 SWPPs for large CWS systems (with populations >50,000) were submitted to the Illinois EPA. The due date for submitting plans for medium CWS systems (with populations between 3,000 and 50,000) was July 25, 2023. The Illinois EPA has received 208 plans from medium systems. SWPP submittals for small systems are due July 25, 2024. The SWPPs will be reviewed to ensure the system has conducted an internal evaluation of their water source(s) and measures are in place to protect each system's water resources.

Monitoring Requirements

By requiring CWS systems to have a monitoring schedule the Illinois EPA can evaluate whether or not CWS systems are collecting samples at the locations and frequencies required by 35 Ill. Adm. Code Part 611. If systems receive monitoring violations this is an indicator that the system may not have adequate managerial, financial or technical capacity to comply with 35 Ill. Adm. Code Part 611. In Illinois, CWS systems are notified of their sampling requirements through sample demand letters. Sample demand letters are sent prior to the start of a monitoring period.

If a new monitoring schedule or a change to a current monitoring schedule is made, the CWS is sent a letter from the compliance officer notifying them of the changes. Monitoring schedules are available to operators through drinking water watch (DWW). Operators are aware that they can view their monitoring schedules in DWW. DWW reflects the most recent monitoring requirements and should be used to confirm monitoring is completed during the correct period.

For lead and copper monitoring changes, the Illinois EPA has a site plan change request form available on our website. CWS systems can request to add, permanently remove, activate, inactivate, and change site information for any of their sites using this form. The owner or operator of each CWS system must develop a material inventory and submit annually by April 15th each year to the Illinois EPA. Responsible Operators in Charge are reminded each year by email notifying them of the upcoming due date to submit their inventory. Illinois EPA is providing technical and compliance assistance for monitoring requirements to CWS via the field offices and the contract with IRWA, who has been providing assistance on monitoring schedules and site plans, and lead service line inventory. Through outreach, IRWA has successfully assisted the Illinois EPA with obtaining service line material inventories from small and disadvantaged CWS.

Operator Certification Program

The Illinois EPA operates a Drinking Water Operator Certification Program that certifies the technical competency of operators of CWS systems in order to assure that the water is safe for ordinary domestic consumption and that existing CWS systems are maintaining adequate technical and managerial capacity. The operators must also maintain proper operation of drinking water treatment systems. In State FY 2023, Illinois had 2452 fully certified CWS operators, not including operators that expired in 2022. There were 100 new operators certified in State FY 2023. An operator certified as competent by the Illinois EPA must be able to perform duties without endangering public health.

In order to determine competency, the Illinois EPA must evaluate whether applicants for operator certification possess the necessary skills, knowledge, ability and judgment to properly operate and maintain the facilities. Therefore, applicants for certification must meet specific experience, education, and examination requirements to qualify for full certification.

To help ensure that certified drinking water operators' knowledge stays current, certified operators are also required to meet continuing education requirements to renew their certification. A minimum of two thirds of the required training must be comprised of courses that are technical in nature. The other third may be comprised of technical or non-technical/professional courses such as safety or management. In 2020, an increase in virtual and correspondence-type operator training courses became available due to the in-ability to meet in-person. The Illinois EPA reviews and approves operator renewal training credit for virtual courses that meet the requirements in 35 Ill. Adm. Code 681.820. These training/continuing education requirements have greatly aided Illinois EPA in helping to build the technical capacity of Illinois' water operators, allowing for continued progress in building capacity development for CWS.

Cross-Connection Control

Illinois requires all public water supplies to have an active, enforceable cross-connection control program in place, and to maintain records to document that cross-connection control is being practiced throughout the public water supply distribution system. Industries or facilities installing or possessing backflow prevention devices must have those devices inspected and tested at the time of installation and at least annually thereafter to ensure continued proper operation.

Verification of inspection must be submitted to public water supply officials, who must ensure that appropriate inspection and maintenance of all cross-connection control devices has been performed. If a CWS system does not have a cross-connection control program or does not provide verification of device inspections as required by 35 Ill. Adm. Code Part 604, these significant deficiencies are included in Notice of Significant Deficiencies letters and must be addressed. If the CWS system does not address these items, then enforcement will occur. Field staff review requirements with operators during inspections and inform systems of what would bring them into compliance.

The cross-connection control device inspector approval program is coordinated by the field operation staff as a basic element of the water supply program. In addition, the TMF pre-screening survey also verifies whether systems are currently implementing a cross-connection control program. Registration and instruction are primarily conducted by the Environmental Resources Training Center, Edwardsville (ERTC), who is serving as an important partner in capacity development as ERTC staff help to further develop the skills needed for progress with technical capacity in for Illinois' CWS.

Asset Management

Illinois encourages the development of asset management plans through a multiple path approach that involves the Drinking Water State Revolving Fund (DWSRF) program, operator training and the sanitary survey process. Illinois encourages public water systems to develop asset management plans by assigning priority points to drinking water state revolving fund loan applicants that are either developing or currently implementing an asset management plan pursuant to 35 Ill. Adm. Code 662.345(g).

In addition to its work with IRWA, Illinois EPA and IDPH are working with Great Lakes Rural Community Assistance Program (RCAP) by utilizing USEPA grant money to provide asset management training and technical assistance to systems interested in developing asset management plans. RCAP is currently working with 5 systems (3 CWS and 2 NCWS systems) to write asset management plans.

An asset management section was added to the recently updated TMF pre-screening survey that is currently implemented in Illinois EPA's engineering evaluations as discussed above. Illinois EPA drinking water FOS staff received training via the USEPA's TMF and asset management training modules. The Illinois EPA added language to field office non-compliance advisory letters

recommending that systems without an asset management develop one. Systems with asset management plans that do not meet all elements of the five-core question framework will receive a recommendation to update their plan. The recommendation also directs systems to the Illinois EPA's recently developed webpage on asset management. The webpage explains the basics of asset management and allows users to click on links to further asset management guidance documents created by USEPA and the Environmental Finance Center. In the future, the Illinois EPA plans to explore the possibility of requiring asset management plans for DWSRF loan applicants as well as for systems applying for a construction permit to increase capacity by greater than 20%. Illinois EPA views the development of asset management plans as integral to building TMF capacity for Illinois' CWS.

Climate Change Adaptation

The Illinois EPA understands the importance of ensuring CWS systems implement climate change adaptation measures to prepare and adjust to both the current and projected impacts of climate change. The DWSRF program, pursuant to 35 Ill. Adm. Code 662.345, awards loan projects additional priority points if the project contains conservation and green infrastructure measures, specifically: projects that are based upon completion of a system-wide audit; projects with utility rates that promote water conservation; projects that utilize improved technologies and practices to reduce energy consumption or use energy in a more efficient way; projects that utilize renewable energy or that produce renewable energy; projects that contain resiliency components; and projects that implement green infrastructure.

The Illinois Administrative Code requires CWS systems to be constructed and have emergency operation plans to ensure climate change resiliency. Pursuant to 35 Ill. Adm. Code 604.135, CWS systems must develop an emergency operations plan. The emergency operation plan must include a review of the methods and means by which alternative supplies of drinking water could be provided in the event of destruction, impairment or contamination of the CWS system. The CWS system must review its emergency operations plan at least every three years and revise as necessary. Pursuant to 35 Ill. Adm. Code 604.110(b), all CWS facilities must be located outside the flood plain or must be at least two feet above the 100-year flood elevation or maximum flood of record. In addition to these requirements, electrical controls must not be subject to flooding and CWS systems must provide on-site, dedicated standby power capable of maintaining continued operation of its water system during power outages pursuant to 35 Ill. Adm. Code 604.155.

NCWS

The IDPH uses a combination of tools to assist existing NCWS systems in acquiring and maintaining TMF capacity. These tools include sanitary surveys, enforcement actions, permit requirements for construction, Source Water Protection Program, monitoring requirements, Operator Certification Program, and technical assistance.

This program is unique because these systems are not in the business of producing water for resale; therefore, the treatment and monitoring of the water system has not traditionally been a routine function of management. The water supply at these facilities is used for drinking, sanitation and, in some cases, manufacturing processes. Demonstrating capacity for these types of NCWS is, for the most part, a small part of the overall management, budget, and operating plan for these facilities.

Since 2020, IDPH has dramatically increased pre-enforcement, formal enforcement, and cross program initiatives to achieve compliance at NCWS. These activities are resulting in many inquiries from NCWS owners and managers. IDPH is then able to help educate these managers on the importance of safe drinking water as a critical component of their operations.

IDPH uses existing field survey and visit information in addition to enforcement data to identify NCWS who need or may benefit from capacity development assistance. Central Office staff coordinates the dissemination of information and education of NCWS personnel for all new or amended regulations and requirements. When on-site capacity assistance is required, Central Office staff coordinate with Regional Office or Local Health Department staff to provide training or technical assistance.

Sanitary Surveys

Sanitary surveys are performed every 2 years at all active, non-licensed NCWS systems and on an annual basis at all active, licensed systems (i.e. campgrounds, youth camps, bathing beaches, swimming pools, migrant labor camps). The sanitary survey includes a review of the eight elements of a sanitary survey: water source, pumps, distribution, storage, treatment, monitoring and reporting of analytical results/ data verification, management and operation, and operator compliance (non-transient systems). IDPH Regional Offices and Local Health Departments working for IDPH completed 1540 sanitary surveys in the 2023 State FY.

The results of the sanitary survey are documented on a sanitary survey/site inspection form. This form is used during the sanitary survey to provide the central office with a “hard” or “electronic” copy documenting that the survey has covered all the eight elements required under the federal regulations. An evaluation summary for each of the eight elements is indicated for all sanitary surveys. The evaluation summary indicates the element was evaluated and if significant deficiencies were noted under that element. This information is reported in SDWIS/State. Significant deficiencies are also listed in detailed description with required corrective action and a due date for completion. In addition, the sanitary survey/site inspection form indicates any changes that occurred since the last survey and provides a summary of coliform and nitrate samples since the last survey.

An inspection letter must be sent to the owner after the sanitary survey has been completed if significant deficiencies are noted. All significant deficiencies are cited with a time for correction. Any recommendations are also listed.

IDPH is implementing a new Sanitary Survey Procedure that will help identify, track, and report significant deficiencies and required corrective actions in SDWIS\State. This procedure has taken some time to develop and should be completed by early Fall 2023. The new Sanitary Survey Procedure may also prove useful in providing data trends to track capacity concerns.

During the sanitary survey an update of inventory information is provided if this information has not been updated in SDWIS/State. This would include any new facility information (source, storage, treatment, etc.) as well as updates to administrative contacts and certified operator information.

Enforcement Actions

The IDPH internal enforcement process escalates to ensure that notification is given to a water supplier found in violation, and that failure to correct the violation within a reasonable amount of time, results in formal enforcement action. IDPH developed a new enforcement Standard Operating Procedure (SOP) with implementation beginning in State FY 2023. This SOP sets up specific levels of enforcement based on violation type, number of violations and/or time in non-compliance status.

Actions or deficiencies that constitute violations subject to enforcement include, but are not limited to the following: monitoring violations, reporting violations, treatment technique violations, MCL violations, maximum residual disinfectant level violations, construction violations and lack of a certified operator. Reportable violations are tracked using a combination of SDWIS/State and an access database. When formal enforcement is triggered, it begins with a Notice of Violation (NOV) being sent to the water supplier. NOV's are tracked in the NCWS Program NOV Database. A list of NOV's and descriptions of the violations issued in State FY 2023 are shown in Table G of this report.

Permit Requirements for Construction

A permit to construct a new non-community public water system must be obtained from the IDPH prior to construction. In addition, a permit for any major alteration of, or extension to, a non-community public water system must be obtained from IDPH prior to construction. Major alterations include changes to source, treatment, storage, distribution, or system capacity. Upon completion of any construction for which a permit has been issued, the owner is required to notify IDPH. All applications for a permit to construct a non-transient, non-community public water system must contain information relative to its financial, managerial, and technical capability to meet all drinking water regulations.

Source Water Protection Program

IDPH has implemented a source water assessment program (SWAP) to assist with wellhead and watershed protection of public drinking water supplies. Assessments have been conducted at more than 4,100 non-community water supplies and continue to be conducted. All new wells and surface water supplies are evaluated as to their vulnerability to potential contamination.

Monitoring Requirements

In Illinois, NCWS systems are notified of their sampling requirements through schedule letters and during the sanitary survey process. Sample schedule letters are sent for coliform and nitrate monitoring requirements and for all non-transient chemical monitoring requirements. The notification by letter of coliform schedules was new in 2022 as this was previously provided during sanitary surveys only. All monitoring schedules are available in drinking water watch and can be accessed at all times.

Operator Certification Program

IDPH operates a Drinking Water Operator Certification Program that certifies the technical competency of operators of NTNCWS systems in order to ensure that drinking water systems are properly operated. In State FY 2023 Illinois had 385 fully certified NTNCWS operators. An operator certified as competent by IDPH must be able to perform duties without endangering public health. In order to be certified by IDPH, an operator must provide evidence of successful completion of a water operator's course that has been approved by the IDPH. In addition, IDPH accepts operators that have been certified by Illinois EPA as a public water supply operators. Certified operators shall be re-certified every three years. In order to be re-certified, the operator shall complete an on-line re-certification course or attend a re-certification training session approved by IDPH. Proof must then be provided of completion of the on-line course or attendance from the organization conducting the training session. New operator certification course and re-certification course providers both have provided virtual courses during the pandemic and will continue to have this ability as needed.

Technical Assistance

IDPH Regional Offices and Local Health Department offices working for IDPH regularly provide technical assistance to NCWS systems through conversations conducted during sanitary surveys as well as answering questions over the phone and e-mail received from NCWS systems throughout the year. The IDPH central office also answers questions and gives assistance over the phone to NCWS systems on a routine basis.

In addition, IDPH refers systems with well problems to licensed well contractors for wells experiencing contamination issues. On particularly difficult well contamination problems, central office staff accompanies inspectors in the field to explain regulations and offer solutions to NCWS owners and operators.

IDPH also refers water systems to RCAP and IRWA as the need and opportunity arise. At the June 12, 2022 IRWA 2023/2024 Operational Planning Meeting, IRWA committed to do technical visits at a group of NCWS with challenging compliance issues in State Fiscal Year 2024.

Identification of Systems in Need of Assistance

CWS

Illinois utilizes the various tools identified in this report to assist CWS systems in acquiring and maintaining TMF capacity. Illinois EPA keeps track of deficiencies found using some of these tools with a combination of the Critical Review List and the Master NOV Database. All enforcement actions are tracked using the Master NOV Database as mentioned previously. Table B lists all violations in the Master NOV Database for State FY 2023. The Illinois EPA continues to review the Master NOV Database and Critical Review List annually to identify common trends in CWS statewide capacity concerns.

Critical Review is defined in 35 Ill. Adm. Code 602.107 as the Illinois EPA's determination that a CWS exceeds 80 percent of the rate of any of the quantity requirements in the Board's or Illinois EPA's rules. Any CWS placed on the Critical Review/Restricted Status List is sent a notification letter. The Illinois EPA publishes a copy of this list on its website and updates regularly. The Board publishes the list in the Environmental Register. A copy of the most updated Critical Review List as of August 2023 can be found in Table C of this report.

The Illinois EPA has begun to train field staff to utilize SDWIS to track CWS inspection deficiencies as discussed in Section 3.1.1 of this report under Engineering Evaluations. In the future, the Illinois EPA plans to use the data in SDWIS to track capacity concerns and compare to baseline data to determine trends.

NCWS

IDPH utilizes the various tools identified in Section 3.1.2 of this report to assist NCWS systems in acquiring and maintaining TMF capacity. IDPH keeps track of violations cited and reported using SDWIS/State and develops reports and spreadsheets with the various violation types listed. All violations and enforcement actions are tracked using SDWIS/State and IDPH is able to query the data with an interactive Access database.

IDPH developed a new enforcement standard operating procedure (SOP) and began implementing this SOP last fiscal year. This SOP allows IDPH to identify systems with the highest priority of non-compliance. Another tool IDPH has developed is the NOV report, Table G. This report identifies all NOVs issued and the violations cited in the Notice. Those NOVs that are still open are candidates for critical need of assistance. Table H details the number of the violation types that are included in the NOVs.

IDPH will begin an annual review of the information in the NOV report (violation types and totals) to identify statewide trends and capacity concerns. This initial listing will be used as a baseline. This initial baseline shows the areas with the most violations are nitrate monitoring and reporting, seasonal startup followed by lack of a certified operator and coliform monitoring and reporting.

Assistance Approach

CWS

As discussed previously, Illinois EPA field staff provide technical assistance to systems with violations or deficiencies found during site inspections. In addition, these technical assistance efforts, Illinois EPA also advises water systems to contact IRWA for deficiencies noted during sanitary surveys that field staff are unable to assist with.

From August 1, 2022 through July 31, 2023, IRWA held 17 cost-free training programs attended by 501 water supply officials representing 292 different water systems. The formal training programs focused on the lead and copper rule requirements, operation and maintenance, state rules and regulations and sanitary surveys. IRWA spent over 382 hours conducting one-on-one technical assistance with water supply officials. In excess of 90 hours of this time was with systems considered “overburdened”. IRWA specialists placed emphasis on assisting community water supplies with the DWSRF program and compliance activities. Twenty hours were spent on emergency planning and requests for “emergency” assistance. Five on-site technical assistance efforts resulted in the development of written case studies that document the needs of respective systems.

The Illinois EPA sorted data from the Master NOV Database for State FY 2023 (Table B) and data from the August 2023 Critical Review List (Table C) and included the data in Table E. Table D is considered the baseline data for CWS for Illinois. By far, the highest number of deficiencies for State FY 2023 in Table E was for systems with only one well. The number of systems with only one well increased slightly from last year most likely due to further investigative efforts. The Illinois EPA plans to reduce the number of systems with one well by offering principal forgiveness to systems to obtain a second water source. The loan requires applicants to justify source alternatives. By requiring systems to provide the alternative justification the Illinois EPA hopes to encourage systems to consider consolidation.

Other categories in Table E that show a significant increase in capacity issues are managerial capacity, monthly operating report submissions, cross connection control, emergency operation plans, and missing permits. These significant increases are due to the Agency assessing violations to thirty CWS operated within correctional facilities in Illinois. The Illinois EPA conducted sanitary surveys at correctional facilities operating CWS systems that had not recently been inspected. The Illinois EPA issued Violations Notices for violations of the Safe Drinking Water Act and Illinois Environmental Protection Act and accompanying regulations to thirty correctional centers operating CWS systems within the facilities over the course of the past year, and has entered into Compliance Commitment Agreements with each facility. Some of the other categories in Table E were combined and new categories were added for nitrification action plans, flushing programs, and other technical deficiencies.

Training provided by IRWA has been an invaluable tool for building TMF capacity for Illinois' CWS. The Illinois EPA plans to explore the possibility of increasing the amount of Drinking Water State Revolving Fund set-asides to provide technical assistance to public water supplies and provide funding to IDPH to support technical assistance for non-community water systems.

NCWS

IDPH will continue to provide technical assistance during sanitary surveys and through phone and e-mail contact with NCWS Systems. Phone and e-mail contact is made frequently with systems cited for deficiencies, violations of drinking water rules and having difficulties meeting drinking water contaminant standards. The IDPH Division of Environmental Health has a Monthly Activity Report (MARS) that documents assistance telephone calls/e-mails with IDPH regulated entities from both Central Office and Regional Office Staff. IDPH will pursue using this as a tool to provide an output of Capacity Development Program activities for providing technical assistance to NCWS from both IDPH Central Office and IDPH Regional Offices.

IDPH did not utilize RCAP or IRWA for on-site assistance in this reporting period. However, IDPH obtained a commitment at the June 12, 2023 IRWA 2023/2024 operational planning meeting for technical assistance visits to two schools with difficult compliance treatment issues and the 8 surface water systems that also have challenging compliance issues. IDPH is hopeful these visits will be fruitful and will continue to look for opportunities to refer NCWS systems with these difficult compliance issues to RCAP or IRWA for on-site assistance.

The American Camp Association – Illinois, an IDPH stakeholder, requested IDPH to participate in a member virtual meeting last reporting period (2021/2022) to provide an overview of regulatory requirements for campgrounds and youth camps classified as NCWS. A meeting was not scheduled this reporting period, but IDPH will look to renew this meeting in the 2023/2024 reporting period.

IDPH continues to coordinate across programs to encourage compliance with drinking water regulations. In the 2022/2023 reporting period, campgrounds and youth camps were again not issued operating license renewals if they operated a NCWS in non-compliance status. This has been helpful in returning many systems to compliance for violations of the drinking water regulations. It has also been helpful to educate many campground and youth camp NCWS owners and managers on drinking water regulations and capacity issues. The IDPH licensing program renewal notice forewarns campgrounds and youth camps that are NCWS systems that water system non-compliance will hold up their camp renewal. This provokes many NCWS owners and managers to find out what is needed to remain in compliance.

Three NCWS participated in a pilot project to develop Asset Management Plans with RCAP and EFC in summer and fall of 2022. Two of these systems were Constellation Energy Systems an IDPH Stakeholder. RCAP and EFC worked directly with these NCWS

to do an Asset Management Review of these systems which included the five-core question framework and produce an Asset Management Plan with recommendations for the NCWS to implement.

On March 28 through March 30, 2023, EFC offered a free on-line training course for Asset Management to small water systems in Illinois. IDPH promoted this training and offered continuing education credit to NCWS certified operators. This effort proved successful as nearly 40 IDH certified operators attended this training session. The training was well received by the operators and was very informative and comprehensive on the benefits of Asset Management.

The Illinois Capacity Development strategy requires IDPH to work to add an asset management section to the sanitary survey checklist. If the TMF pre-screening survey finds that the public water system does not have an asset management plan that incorporates all components of the five-core-question framework, then a recommendation will be added to the sanitary survey inspection letter advising the public water system to address this deficiency. IDPH has been delayed in implementing this component of the strategy for a couple reasons. First, as noted in 3.1.2, IDPH is implementing a new Sanitary Survey Procedure that will help identify, track, and report Significant Deficiencies and required corrective actions in SDWIS/State. This procedure has taken some time and effort to develop, delaying work on the TMF pre-screening checklist. Second, IDPH has had difficulty finding TMF pre-screening checklists applicable to NCWS. IDPH will continue to work on adding this procedure of the strategy in State Fiscal Year 2024.

Implementation Review

CWS

The Illinois EPA has conducted a review of the existing system implementation strategy and found numerous areas that may be improved upon. These areas include, but are not limited to, continuing to provide training to field staff on how to utilize SDWIS to track deficiencies noted during site-inspections, documenting technical assistance activities, exploring the possible use of additional set-asides to fund technical assistance efforts, and exploring the possibility of requiring CWS systems to develop asset management plans.

NCWS

The IDPH has conducted a review of implementation of the existing system strategy and found some areas that may be improved upon. These areas include but are not limited to the following: continuing to look for more opportunities to utilize RCAP or IRWA for on-site assistance; continuing to look for viable options to provide financial planning assistance for NCWS systems including a pre-screening sanitary survey checklist that incorporates the 5-core-question framework; and continuing to incorporate stakeholder involvement. In addition, IDPH will pursue, using it's MARS Report as a tool, providing an output of Capacity Development

Program activities and technical assistance. When these items are implemented, the existing capacity development strategy will be updated.

Modifications to Existing Strategy

CWS

Illinois did make modifications to the existing CWS strategy in State FY 2023. These modifications include updating the TMF pre-screening survey, adding an asset management plan recommendation to FOS non-compliance letters, using SDWIS to track inspection deficiencies, documenting technical assistance efforts in the field, and adding a section on asset management and climate change adaptation to this report. Illinois EPA has also modified its strategy to place a higher priority on building TMF capacity and providing technical assistance to Environment Justice communities and other small and disadvantaged CWS. In addition, in FY23, Illinois EPA inspected thirty CWS operated within Illinois correctional facilities, and has entered into Compliance Commitment Agreements requiring a date-certain return to compliance by those CWS. In addition, Illinois EPA is providing technical assistance to these CWS via its field offices and technical assistance partnerships.

NCWS

Illinois is providing the NOV report, which details NOVs issued and violations cited, in Table G. Table H details the violation types and numbers that caused NOVs to be issued. In addition, IDPH is implementing a new Sanitary Survey SOP that will help identify, track, and report significant deficiencies and required corrective actions in SDWIS\State. This SOP will be effective by September 30, 2023.

Summary

Illinois has developed a strong Capacity Development program, and is continuing its efforts to build TMF capacity in Illinois' CWS. These efforts, largely accomplished via work done by the Field Operations Section, Compliance Assurance Section, and Technical Assistance partners, have resulted in building capacity at many systems that have a history of noncompliance and are small and disadvantaged CWS. Illinois EPA is striving to support communities that need assistance most, such as Environmental Justice Communities and small and disadvantaged systems by prioritizing sanitary surveys, technical assistance, and enforcement where necessary, at these CWS. Technical assistance has provided much-needed support in the form of trainings and the development of emergency operations plans, asset management plans, and compliance assistance for monitoring and lead service line inventories. Illinois continues to invest in system restructuring, training efforts, source water assessment and protection plans, and utilizes the DWSRF program to the best of its ability to aid Illinois' CWS. Many Illinois CWS continue to face significant funding and technical capacity challenges. As regulatory requirements continue to increase, such as with the promulgation of regulations for emerging

contaminants, CWS struggle to meet the financial burden of installing treatment and upgrading aging water treatment plants. In addition, as aging certified operators retire and leave the workforce, CWS are struggling to hire new operators. The Illinois EPA and the Public Water Supply Operator Advisory Board remain concerned that the technical capacity of water systems will be greatly affected as operators retire. Again, Illinois EPA views its training partners as important tools in building TMF capacity to address these continuing challenges for Illinois' PWS.

This report is available to the public at [EPA \(illinois.gov\)](https://www.epa.gov/illinois).

4.0 Tables

TABLE A

New CWS Systems State FY 2021 Through State FY 2023

System ID	System Name	Activity Status	Activity Date	Capacity Demonstration Notes/Approval Dates	ETT Score >11
IL0150030	Thomson Maximum Security Center	Active	6/8/2023	Existing facility, no new infrastructure built	No
IL0815110	Rolling Meadows MHP (Jefferson CO)	Active	4/17/2023	Existing facility, no new infrastructure built	No
IL1635055	Arapaho Village MHP	Active	4/5/2023	Existing facility, no new infrastructure built	No
IL1990560	Marion Mobile Home Village	Active	3/24/2023	Existing facility, No new infrastructure built	No
IL1795030	UAW Senior Citizens Center	Active	3/24/2023	Existing facility, no new infrastructure built	No
IL0430055	Aqua Illinois – Oak Brook	Pending	3/16/2023	Existing facility, no new infrastructure built	No
IL1934000	W2E Water Coop	Pending	2/28/2023	New CWS, capacity demonstration needs to be submitted	No
IL1010010	Lawrence County Correctional Center	Active	2/6/2023	Existing facility, no new infrastructure built	No
IL0210010	Taylorville Correctional Center	Active	2/6/2023	Existing facility, no new infrastructure built	No
IL1670200	Cottonwood Cove MHP	Active	1/1/2023	Existing facility, no new infrastructure built	No
IL1670225	Forrest Park MHP	Active	1/1/2023	Existing facility, no new infrastructure built	No
IL0317010	Harbor Point Estates MHP	Active	1/1/2023	Existing facility, no new infrastructure built	No
IL0971540	Cambridge Courts MHP	Active	9/30/2022	Existing facility, no new infrastructure built	No

IL1670260	United Regional Water Coop	Active	9/1/2022	New CWS, Capacity Demonstration Approved 11/6/2020	No
IL1970460	Joliet Inpatient Treatment Center	Active	8/30/2022	Existing facility, no new infrastructure built	No
IL1815500	Choate MHC	Active	6/21/2022	Existing facility, no new infrastructure built	No
IL1115125	Oakbrook Estates MHP	Active	5/11/2022	Existing facility, no new infrastructure built	No
IL0978970	LCPW – Oak Terrace	Active	5/4/2022	Existing facility, no new infrastructure built	No
IL0075185	Four Seasons MHP	Active	4/6/2022	Existing facility, no new infrastructure built	No
IL1631150	Valley View Estates	Active	2/18/2022	Existing facility, no new infrastructure built	No
IL1590220	Acorn Acres MHP	Active	11/9/2021	Existing facility, no new infrastructure built	No
IL1635000	Cahokia Heights	Active	8/6/2021	Existing facility, no new infrastructure built	No
IL0810200	Oak Grove Village	Active	7/12/2021	Existing facility, no new infrastructure built	No
IL1635060	Meadowbrook MH Community, LLC	Active	3/23/2021	Existing facility, no new infrastructure built	No
IL0890080	Recovery Centers of America	Active	11/24/2020	Existing facility, no new infrastructure built	No
IL0971700	Brookdale Senior Living – Vernon Hills	Active	11/18/2020	Existing facility, no new infrastructure built	No
IL0830020	IL Alluvial Regional Water Company	Pending	11/2/2020	New CWS, Capacity Demonstration Approved 12/23/2022	No
IL1150160	Decatur MHP, LLC	Active	7/8/2020	Existing facility, no new infrastructure built	No

TABLE B

CWS State FY 2023 Violations Issued *

Facility Name	Facility ID Number	VN Number	VN Description	VN Issued
ABINGDON	IL0950050	W-2022-00067	FAILURE TO PREPARE, DISTRIBUTE 2022 CCR WITH ALL REQUIRED CCR ELEMENTS	12/8/2022
ALMA	IL1210050	W-2022-00069	FAILURE TO DISTRIBUTE CCR ACCORDING TO MOD WITH ALL ELEMENTS AND FAILURE TO COLLECT BACTI SAMPLE	12/7/2022
AQUA ILLINOIS-OAK RUN	IL0955200	W-2023-00001	CHLORINE FEED RATE IS ABOVE MAXIMUM DOSAGE RATE	1/17/2023
BARDOLPH	IL1090050	W-2023-00015	EXCEEDANCE OF LRAA MCL FOR TTHM	2/15/2023
BEECHER CITY	IL0490100	W-2023-00021	EXCEEDANCE OF LRAA MCL FOR TTHM'S AND HAA5'S	4/14/2023
BETHALTO	IL1190150	W-2022-00061	FAILURE TO MONITOR ANNUAL DBP'S DURING THE PEAK HISTORICAL MONTH	11/18/2022
BIG MUDDY RIVER CORRECTIONAL CENTER	IL0810020	W-2023-00030	MULTIPLE FOS VIOLATIONS	5/3/2023
BISHOP HILL	IL0730250	W-2023-00002	MISSING OPERATING AND CONSTRUCTION PERMITS	1/18/2023
BOWEN	IL0670200	W-2022-00045	Failed to maintain WQP Ranges	10/3/2022
BROWNSTOWN	IL0510100	W-2023-00022	EXCEEDANCE OF LRAA MCL OR TTHM; FAILURE TO MONITOR COLIFORM/CHLORINE RESIDUAL	3/17/2023
BUCKLEY	IL0750150	W-2023-00036	FAILURE TO OBTAIN A CONSTRUCTION PERMIT FOR A WATERMAIN EXTENSION	5/31/2023
CAMP POINT	IL0010050	W-2022-00044	FAILURE TO MAINTAIN WQP RANGES	10/3/2022
CENTRALIA CORRECTIONAL SITE	IL0275600	W-2023-00032	MULTIPLE VIOLATIONS FROM FOS	4/18/2023
CHENOA	IL1130300	W-2023-00014	EXCEEDANCE OF LRAA MCL FOR TTHM	2/15/2023
CHRISMAN	IL0450100	W-2022-00066	FAILURE TO SUBMIT OCCT RECOMMENDATION, LEAD CONSUMER NOTICE AND PUBLIC EDUCATION	11/29/2022

Facility Name	Facility ID Number	VN Number	VN Description	VN Issued
CISCO	IL1470150	W-2023-00016	FAILURE TO RECOMMEND THE INSTALLATION AND OPERATION OF SOURCE WATER TREATMENT	6/16/2023
Clayton Work Camp	IL0010150	W-2023-00025	MULTIPLE VIOLATIONS FROM FOS	3/31/2023
CLAYTON-CAMP-POINT WATER COMMISSION	IL0015200	W-2022-00056	FAILURE TO PROPERLY FEED ORTHOPHOSPHATE AT CALCULATED DOSAGE RATE OF 2.5 MG/L OR GREATER	10/5/2022
CUTLER	IL1450050	W-2022-00047	VIOLATIONS FROM FOS	9/7/2022
DANVILLE CORRECTIONAL CENTER	IL1835400	W-2023-00034	MISC FROM FOS	4/21/2023
DECATUR CORRECTIONAL CENTER	IL1150140	W-2023-00009	FAILURE TO HAVE A NAP, CC PROGRAM, EMERGENCY OPERATIONS PLAN, FLUSHING PROGRAM AND TO SUBMIT MORS	2/6/2023
DES PLAINES MHP	IL0317775	W-2022-00048	EXCEEDING THE GROSS ALPHA MCL AT TP01	8/26/2022
DIXON CORRECTIONAL CENTER	IL1035500	W-2023-00038	MULTIPLE FOS VIOLATIONS	5/16/2023
EAST DUNDEE	IL0890250	W-2022-00060	FAILURE TO SUBMIT MONTHLY OPERATING REPORTS	12/27/2022
EAST MOLINE CORRECTIONAL CENTER	IL1617120	W-2023-00042	MISC FROM FOS	5/19/2023
EDINBURG	IL0210150	W-2022-00071	EXCEEDANCE OF LRAA MCL FOR TTHM	1/4/2023
FORD HEIGHTS	IL0310720	W-2022-00065	FOS VIOLATIONS	12/14/2022
FRANKLIN GROVE	IL1030250	W-2023-00003	LACK OF CERTIFIED OPERATOR	1/27/2023
GRAHAM CORRECTIONAL SITE	IL1355100	W-2023-00020	MULTIPLE SIGNIFICANT DEFICIENCIES FROM FOS	2/21/2023
HILL CORRECTIONAL CENTER	IL0950010	W-2023-00033	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	4/18/2023
HILLTOP MHP	IL1130080	W-2022-00068	FAILURE TO PREPARE AND DISTRIBUTE ALL REQUIRED CCR ELEMENTS	12/13/2022
IL RIVER CORRECTIONAL CENTER	IL0570020	W-2023-00026	MISC FROM FOS	3/31/2023
JACKSONVILLE CORRECTIONAL CENTER	IL1375200	W-2023-00023	MULTIPLE FOS VN	3/31/2023
JASPER WATERWORKS CORPORATION	IL1910020	W-2022-00058	FAILURE TO MAINTAIN A MINIMUM COMBINED CHLORINE RESIDUAL OF 1.0 MG/L IN ALL PARTS OF DISTRIBUTION.	10/19/2022

Facility Name	Facility ID Number	VN Number	VN Description	VN Issued
JOLIET INPATIENT TREATMENT CENTER	IL1970460	W-2023-00010	LACK OF CROSS CONNECTION CONTROL PROGRAM, MISSING MONTHLY OPERATING REPORTS, NO BACTERIOLOGICAL PLAN	2/10/2023
KEWANEE LSRC	IL0730650	W-2023-00044	MISC FROM FOS	5/19/2023
LAWRENCE COUNTY CORRECTIONAL CENTER	IL1010010	W-2023-00011	MULTI FOS VN	2/7/2023
LEROY	IL1130750	W-2023-00041	EXCEEDANCE OF LRAA MCL FOR HAA5/FAILURE TO PROVIDE PUBLIC EDUCATION	6/2/2023
LINCOLN CORRECTIONAL CENTER	IL1075450	W-2023-00029	FOS INSPECTION VIOLATIONS	4/21/2023
LOGAN CORRECTIONAL CENTER	IL1075520	W-2023-00013	MULTIPLE VIOLATIONS FROM FOS	2/14/2023
MARENGO	IL1110650	W-2022-00042	FAILURE TO PROVIDE SAFE SOURCE OF WATER, FAILURE TO FULFILL CONDITIONS OF SEP	8/24/2022
MENARD CORRECTIONAL CENTER	IL1575550	W-2023-00039	MULTIPLE VIOLATIONS FROM FOS	5/15/2023
MOKENA	IL1970600	W-2022-00055	FAILURE TO COMPLETE CROSS CONNECTION SURVEY	12/14/2022
MULBERRY GROVE	IL0050100	W-2022-00046	HAA5 MCL EXCEEDANCE	8/26/2022
MUNDELEIN	IL0971150	W-2022-00050	FAILURE TO COMPLETE TRENIAL CROSS-CONNECTION SURVEYS	8/30/2022
MURDALE PWD	IL1910020	W-2022-00059	FAILURE TO PROVIDE 10' OF HORIZONTAL SEPARATION AND FAILURE TO OBTAIN SUPPLEMENTAL APPROVAL	12/27/2022
MURPHYSBORO LSRC	IL0770500	W-2023-00040	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	4/28/2023
NEW PIASA CHAUTAUQUA PWS	IL0830010	W-2023-00004	FAILURE TO SUBMIT AN OPERATOR CONTRACT	1/24/2023
NICOR GAS, TROY GROVE STATION, NORTH STRUCTURE	6370	W-2023-00027	GROUNDWATER QUALITY STANDARDS EXCEEDANCES	3/21/2023
NOBLE	IL1590150	W-2022-00039	EXCEEDANCE OF LRAA MCL FOR TTHM	7/13/2022
NORTH CHICAGO	IL0971250	W-2023-00046	EXCEEDANCE OF LRAA MCL FOR TTHM	6/13/2023
NORTHMEADOW VILLAGE MHP	IL1130060	W-2022-00057	FAILURE TO PREPARE AND DISTRIBUTE A 2022 CCR THAT INCLUDES ALL REQUIRED CCR ELEMENTS	10/3/2022

Facility Name	Facility ID Number	VN Number	VN Description	VN Issued
PINCKNEYVILLE CORRECTIONAL CENTER	IL1450010	W-2023-00024	MULTIPLE FOS VN	4/21/2023
Pittsfield WC	IL1490760	W-2023-00028	MISC FROM FOS	4/18/2023
PONTIAC Adm. Code CORRECTIONAL CENTER	IL1055500	W-2023-00008	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	2/6/2023
POSEN	IL0312520	W-2022-00051	FAILURE TO CONDUCT TRIENNIAL CROSS-CONNECTION SURVEY AND ANNUAL BACKFLOW DEVICE TESTING	8/30/2022
RAMSEY	IL0510200	W-2023-00035	EXCEEDANCE OF LRAA MCL FOR HAA5	5/10/2023
ROBINSON CORRECTIONAL CENTER	IL0330010	W-2023-00007	FOS VIOLATIONS FROM INSPECTION	2/6/2023
ROCKDALE	IL1970850	W-2022-00062	FAILURE TO SAMPLE QUARTERLY FOR LEAD SEQUENTIAL PROFILING	11/28/2022
SAYBROOK	IL1130950	W-2023-00017	FAILURE TO OBTAIN CONSTRUCTION PERMIT AND OPERATING PERMIT FOR NEW ELEVATED TANK	3/9/2023
SHAWNEE CRCTL CNTR	IL0870010	W-2023-00019	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	2/14/2023
SHERIDAN CRCTL CNTR	IL0995840	W-2022-00072	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	12/27/2022
SOUTH JACKSONVILLE	IL1370400	W-2022-00043	FAILURE TO PROVIDE SAFE SOURCE OF RAW WATER	8/25/2022
SOUTHWESTERN IL CORRECTIONAL CENTER	IL1630030	W-2023-00037	MISC FROM FOS FOR DOC FACILITY	5/3/2023
ST ROSE PWD	IL0275250	W-2022-00063	FAILURE TO SEPARATE WATER WITH A FREE CHLORINE RESIDUAL FROM WATER WITH COMBINED.	11/28/2022
STATEVILLE CORRECTIONAL CENTER		W-2022-00073	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	1/9/2023
SUGAR GROVE	IL0890850	W-2023-00045	EXCEEDANCE OF MANGANESE STATE ONLY MCL AT TP01	5/15/2023
TAYLORVILLE CORRECTIONAL CENTER	IL0210010	W-2023-00012	MULTIPLE VN FROM FOS	2/21/2023
VANDALIA CORRECTIONAL CENTER	IL0510350	W-2023-00043	MISC FROM FOS	5/19/2023
VIENNA	IL0875510	W-2022-00070	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	12/13/2022

Facility Name	Facility ID Number	VN Number	VN Description	VN Issued
WADSWORTH OAKS SUBDIVISION	IL0977320	W-2023-00005	FAILURE TO COMPLETE PREVIOUSLY NOTED ON-GOING VIOLATIONS	1/18/2023
WAUKEGAN	IL0971900	W-2022-00041	FAILURE TO COMPLETE A CORROSION CONTROL STUDY	8/4/2022
WEST LIBERTY-DUNDAS WATER DISTRICT	IL1595050	W-2022-00040	EXCEEDANCE OF LRAA MCL FOR TTHM	7/13/2022
WESTERN IL CORRECTIONAL CENTER	IL0090010	W-2023-00018	MULTIPLE VIOLATIONS FROM FOS	2/27/2023
WESTERN SPRINGS	IL0313180	W-2022-00064	FAILURE TO SUBMIT CCR ELEMENTS AND FAILURE TO SUBMIT MORS	12/13/2022
WILDWOOD MHP	IL0775410	W-2023-00006	LACK OF AN APPROVED OPERATOR CONTRACT	4/27/2023
WILLOW CREEK NORTH MHP	IL1135130	W-2022-00054	LACK OF A CERTIFIED OPERATOR	11/10/2022

*If more than one violation occurred at a facility, each type of violation is counted in baseline data in Table E

TABLE C

Illinois EPA DPWS Critical Review List August 2023

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
AIR VIEW MHP	IL1615185	1	NO BACKUP SOURCE	164	8/7/2020
ANCHOR	IL1130050	4	ONLY ONE WELL	155	8/28/2020
AQUA ILLINOIS - HIGHLAND ESTATES	IL0915220	2	ONLY ONE WELL	171	1/13/2021
AQUA ILLINOIS - INDIANOLA	IL1830500	4	ONLY ONE WELL	224	12/11/2020
AQUA ILLINOIS - SKYLINE	IL0915450	2	ONLY ONE WELL	208	1/8/2021
AQUA ILLINOIS - SUN RIVER TERRACE	IL0910720	2	ONLY ONE WELL	495	1/13/2021
BEAVER CREEK VILLAGE MHP	IL0755125	4	ONLY ONE WELL	48	1/6/2021
BROWNING	IL1690050	5	ONLY ONE WELL	175	12/2/2020
BUFFALO HOLLOW FARMS WATER ASSOCIATION	IL1430080	5	ONLY ONE WELL	45	7/22/2020
BUSY BEE MHP #1	IL1975195	2	ONLY ONE WELL	25	12/4/2020
CAMP GROVE	IL1235100	1	ONLY ONE WELL	75	6/24/2020
CANTON	IL0570250	5	INADEQUATE TREATMENT CAPACITY	13932	3/15/2007
CAPRON MHP	IL0075105	1	ONLY ONE WELL	98	1/27/2021
CARBON HILL	IL0630100	2	INADEQUATE TREATMENT CAPACITY	392	12/14/2016
CARROLL HEIGHTS UTILITIES COMPANY	IL0155200	1	ONLY ONE WELL	80	1/27/2021
CARTHAGE*	IL0670250	5	ONLY ONE WELL	2605	4/11/2023
CEDAR BROOK ESTATES SUBDIVISION	IL1615170	1	ONLY ONE WELL	200	8/7/2020
CEDAR POINT WATER COMPANY	IL0995040	1	ONLY ONE WELL	300	8/26/2020
CEDAR WATER COMPANY, INC.	IL0955150	5	ONLY ONE WELL	160	1/13/2021

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
CENTURY PINES APARTMENTS	IL0150020	1	ONLY ONE WELL	25	1/27/2021
CHAIN-O-LAKES MHP	IL0975165	2	ONLY ONE WELL	81	8/28/2020
CHERRYDALE SUBDIVISION	IL1615120	1	ONLY ONE WELL	80	8/5/2020
CHIGAKWA PARK ESTATES	IL1615140	1	ONLY ONE WELL	53	8/7/2020
CLARKS MHP	IL2015425	1	ONLY ONE WELL INADEQUATE TREATMENT	80	12/4/2020
COAL CITY	IL0630200	2	CAPACITY	5587	12/14/2016
COLONIAL MEADOWS	IL1135100	6	ONLY ONE WELL	190	9/26/2020
COUNTRY LANE MHP	IL1135385	4	ONLY ONE WELL	35	6/24/2020
COUNTRY VIEW ESTATES MHP	IL0195625	4	ONLY ONE WELL	97	1/27/2021
COUNTRY VIEW ESTATES SUBDIVISION	IL1415220	1	ONLY ONE WELL	120	7/15/2020
DE WITT	IL0390100	4	ONLY ONE WELL	200	1/27/2021
DIXIE ESTATES SUBDIVISION	IL1975520	2	ONLY ONE WELL	180	12/9/2020
DONNY BROOK ESTATES	IL0375150	1	ONLY ONE WELL	30	1/27/2021
DONOVAN	IL0750400	4	ONLY ONE WELL	306	1/6/2021
EAST END WATER ASSOCIATION	IL1610140	1	ONLY ONE WELL	40	7/31/2020
EAST LAWN WATER ASSOCIATION	IL1615100	1	ONLY ONE WELL	160	8/5/2020
EAST LYNN COMMUNITY WATER SYSTEM	IL1835200	4	ONLY ONE WELL	112	12/11/2020
EAST SIDE MHP	IL0195825	4	ONLY ONE WELL	95	1/27/2021
EBERTS 3RD ADDITION	IL1615330	1	ONLY ONE WELL	99	8/12/2020
EDELSTEIN WATER COOPERATIVE	IL1435150	5	ONLY ONE WELL	125	7/24/2020
EHLERS MHP	IL0195645	4	ONLY ONE WELL	112	1/27/2021
ELM OAK MUTUAL WATER SYSTEM	IL0975736	2	ONLY ONE WELL	50	8/28/2020
ESQUIRE ESTATES MHP	IL1435245	5	ONLY ONE WELL	28	7/29/2020
EAST LYNN COMMUNITY WATER SYSTEM	IL1835200	4	ONLY ONE WELL	112	12/11/2020
EAST SIDE MHP	IL0195825	4	ONLY ONE WELL	95	1/27/2021
EBERTS 3RD ADDITION	IL1615330	1	ONLY ONE WELL	99	8/12/2020
EDELSTEIN WATER COOPERATIVE	IL1435150	5	ONLY ONE WELL	125	7/24/2020
EHLERS MHP	IL0195645	4	ONLY ONE WELL	112	1/27/2021
ELM OAK MUTUAL WATER SYSTEM	IL0975736	2	ONLY ONE WELL	50	8/28/2020
ESQUIRE ESTATES MHP	IL1435245	5	ONLY ONE WELL	28	7/29/2020

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
EVERGREEN VILLAGE SUBDIVISION	IL1615310	1	ONLY ONE WELL	130	8/12/2020
FOUR STAR CAMPGROUND	IL0990060	1	ONLY ONE WELL	150	8/26/2020
FOX CREEK FARMS WATER COMPANY	IL1435750	5	ONLY ONE WELL	221	7/29/2020
FOX LAWN HOMEOWNERS WATER ASSOCIATION	IL0935150	2	ONLY ONE WELL	167	1/13/2021
FRENTRESS LAKE	IL0850010	1	ONLY ONE WELL	150	1/8/2021
GARDEN STREET IMPROVEMENT ASSOCIATION	IL1975376	2	ONLY ONE WELL	54	12/9/2020
GREEN ACRES MHP	IL1035165	1	ONLY ONE WELL	200	8/26/2020
HARMON	IL1030300	1	ONLY ONE WELL	149	8/26/2020
HAZELWOOD 4TH ADDITION	IL0735350	1	ONLY ONE WELL	135	1/6/2021
HAZELWOOD WEST SUBDIVISION	IL0735250	1	ONLY ONE WELL	70	1/6/2021
HEATHERFIELD SUBDIVISION	IL0635150	2	ONLY ONE WELL	90	1/29/2021
HICKORY HILLS 2ND ADDITION WATER ASSOCIATION	IL0730080	1	ONLY ONE WELL	93	8/12/2020
HICKORY HILLS 2ND ADDITION*	IL1615450	1	ONLY ONE WELL	42	7/28/2023
HIGHLAND LAKE WATER COMPANY	IL0970255	2	ONLY ONE WELL	36	8/26/2020
HIGHLAND SUBDIVISION	IL0895530	2	ONLY ONE WELL	40	1/8/2021
HILLCREST	IL1410250	1	INADEQUATE STORAGE CAPACITY	1400	11/2/2017
HILLSDALE ESTATES, LLC	IL1615530	1	ONLY ONE WELL	63	8/14/2020
HILLSDALE PROPERTIES	IL1615728	1	ONLY ONE WELL	60	6/24/2020
HOLLANDS GROVE COURT SUBDIVISION	IL1795300	5	ONLY ONE WELL	40	12/2/2020
HOLLY HOCK HILL MHP	IL0975245	2	ONLY ONE WELL	52	8/28/2020
HOPEWELL	IL1235150	1	ONLY ONE WELL	420	7/1/2020
IL AMERICAN - LEONORE	IL0990400	1	ONLY ONE WELL	111	8/26/2020
IL AMERICAN - MIDWEST PALOS	IL0317050	2	ONLY ONE WELL	143	1/27/2021
IL AMERICAN - NETTLE CREEK	IL0630040	2	ONLY ONE WELL	285	1/29/2021
IL AMERICAN - RIDGECREST	IL0635100	2	ONLY ONE WELL	219	1/29/2021
IL PRAIRIE ESTATE SBDV WATER ASSN	IL0995300	1	ONLY ONE WELL	112	8/26/2020
INDIAN BLUFFS SUBDIVISION	IL1615520	1	ONLY ONE WELL	150	8/14/2020

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
INDIAN CREEK HOMEOWNERS AND WATER ASSN	IL1135250	4	ONLY ONE WELL	240	6/17/2020
IROQUOIS MOBILE ESTATES, INC.	IL0755185	4	ONLY ONE WELL	105	1/8/2021
JOHNSBURG 1	IL1110040	2	ONLY ONE WELL	174	8/28/2020
KENNEY	IL0390200	4	ONLY ONE WELL	374	1/29/2021
KNOLLS EDGE SUBDIVISION	IL1415250	1	ONLY ONE WELL	100	7/17/2020
LAFAYETTE	IL1750100	1	ONLY ONE WELL	250	12/2/2020
LAKE LYNWOOD WATER SYSTEM	IL0735330	1	ONLY ONE WELL	75	1/6/2021
LAKE SHANNON	IL0910020	2	ONLY ONE WELL	500	1/13/2021
LAKE WILDWIND LLC	IL2035125	1	ONLY ONE WELL	200	12/4/2020
LAND AND WATER ASSOCIATION	IL0995050	1	ONLY ONE WELL	100	8/26/2020
LASALLE	IL0990300	1	INADEQUATE SOURCE CAPACITY & INADEQUATE TREATMENT CAPACITY	9700	11/1/2004
LINDENWOOD WATER ASSOCIATION	IL1415300	1	ONLY ONE WELL	35	7/22/2020
LISBON NORTH, INC.	IL0631000	2	ONLY ONE WELL	25	1/29/2021
LYNN WATER ASSOCIATION	IL0735100	1	ONLY ONE WELL	42	1/8/2021
LYNNWOOD WATER CORPORATION	IL0995336	1	ONLY ONE WELL	110	8/26/2020
LYNWOOD 3RD ADDITION	IL0735280	1	ONLY ONE WELL	100	1/6/2021
M C L W SYSTEM, INC.	IL1315150	1	ONLY ONE WELL	98	7/10/2020
MACOMB	IL1090350	5	INADEQUATE CLARIFIER CAPACITY	11309	12/14/2016
MAQUON	IL0950350	5	ONLY ONE WELL	284	1/13/2021
MARSEILLES SOUTH	IL0990110	1	ONLY ONE WELL	100	8/26/2020
MASON CITY	IL1250350	5	INADEQUATE STORAGE CAPACITY	2558	1/1/2006
MAYFAIR SUBDIVISION	IL1795750	5	ONLY ONE WELL	90	12/11/2020
MAZON**	IL0630500	2	NEAR A MANGANESE MCL VIOLATION	987	7/8/2022
MC NABB	IL1550150	1	ONLY ONE WELL	310	6/11/2020
MILL POINT MHP	IL2035165	1	ONLY ONE WELL	160	12/4/2020
MOUND CITY	IL1530100	7	ONLY ONE WELL	588	6/5/2020
MOUND PWD	IL1635050	6	INADEQUATE PLANT CAPACITY	2200	6/17/1996
MOUNT MORRIS ESTATES MHP	IL1415185	1	ONLY ONE WELL	395	7/15/2020
MOUNT VERNON ASSOCIATION INC.	IL0855100	1	ONLY ONE WELL	490	1/8/2021

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
NORTH HAZELWOOD SUBDIVISION	IL0735850	1	ONLY ONE WELL	100	1/8/2021
NORTH HENDERSON	IL1310300	1	ONLY ONE WELL	187	7/2/2020
OAK GROVE MHP - ROCK ISLAND COUNTY	IL1617785	1	ONLY ONE WELL	100	12/2/2020
OAK VIEW ESTATES	IL0730120	1	ONLY ONE WELL	95	1/29/2021
OAKWOOD WEST SUBDIVISION	IL0730070	1	ONLY ONE WELL INADEQUATE TREATMENT	45	1/29/2021
OLNEY	IL1590200	7	CAPACITY	9315	10/28/2022
OPHIEM PWS	IL0735150	1	ONLY ONE WELL	100	1/8/2021
OTTAWA ESTATES MHP	IL0995225	1	ONLY ONE WELL	115	8/26/2020
PARADISE MANOR MHP	IL1617665	1	ONLY ONE WELL	200	11/20/2020
PARK MEADOWLAND WEST MHP	IL0075235	1	ONLY ONE WELL	100	1/27/2021
PAULS MHP	IL0975485	2	ONLY ONE WELL	38	8/28/2020
PHIL-AIRE ESTATES MHP	IL2015625	1	ONLY ONE WELL	80	12/4/2020
POLO DR AND SADDLE RD SUBDIVISION	IL0437000	1	ONLY ONE WELL	93	1/29/2021
PORT BARRINGTON SHORES SUBDIVISION	IL0971120	2	ONLY ONE WELL	67	8/26/2020
POWERS WATER CO., INC	IL0895550	2	ONLY ONE WELL	214	1/8/2021
PRAIRIE OAKS ESTATES HOMEOWNERS' ASSOCIATION	IL0630060	2	ONLY ONE WELL	107	1/29/2021
PRAIRIE PATH WATER - CAMELOT	IL1975200	2	ONLY ONE WELL	575	12/9/2020
PRAIRIE PATH WATER - CHERRY HILL WATER COMPANY	IL1975280	2	ONLY ONE WELL	624	12/9/2020
PRAIRIE VIEW WATER ASSOCIATION	IL1795900	5	ONLY ONE WELL	35	12/11/2020
QUINCY	IL0010650	5	INADEQUATE CLARIFIER CAPACITY	45000	8/3/2016
RAINBOW LANE MHP	IL2015645	1	ONLY ONE WELL	83	12/4/2020
RAINBOW RIDGE	IL1615580	1	ONLY ONE WELL	46	8/14/2020
REDDICK	IL0914780	2	ONLY ONE WELL	210	1/8/2021
RIDGEWOOD LEDGES WATER ASSOCIATION	IL1615670	1	ONLY ONE WELL	430	6/24/2020
ROLLING GREEN ESTATES MHP	IL1415245	1	ONLY ONE WELL	215	7/17/2020
RUSTIC ACRES WATER ASSOCIATION	IL0735500	1	ONLY ONE WELL	260	1/6/2021
SANTA FE ESTATES WATER ASSOCIATION	IL1435490	5	ONLY ONE WELL	84	7/29/2020
SEATON	IL1310350	1	ONLY ONE WELL	200	7/2/2020
SENECA MOBILE HOMES LLC	IL0995425	1	ONLY ONE WELL	73	8/26/2020
SHERIDAN CORRECTIONAL CENTER*	IL0995840	1	INADEQUATE TREATMENT CAPACITY	1800	1/27/2023
SIX OAKS MHP	IL2015685	1	ONLY ONE WELL	48	12/4/2020

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
SPIN LAKE HOMEOWNERS' ASSOCIATION	IL1135140	4	ONLY ONE WELL	200	6/16/2020
STELLE COMMUNITY ASSOCIATION	IL0535100	4	ONLY ONE WELL	100	1/29/2021
STORYBOOK HIGHLANDS	IL0935250	2	ONLY ONE WELL	100	1/13/2021
STRATFORD WEST APARTMENTS	IL1095200	5	ONLY ONE WELL	44	8/26/2020
STRAWN	IL1050700	4	ONLY ONE WELL	133	8/26/2020
SUBURBAN HEIGHTS SUBDIVISION	IL1615800	1	ONLY ONE WELL	57	11/20/2020
TENNANTS SHADY OAKS SUBDIVISION	IL1615540	1	ONLY ONE WELL	44	8/14/2020
TIMBER BROOK ESTATES	IL0735450	1	ONLY ONE WELL	120	1/6/2021
TIMBER RIDGE SUBDIVISION	IL0735470	1	ONLY ONE WELL	120	1/6/2021
TISKILWA	IL0111050	1	INADEQUATE STORAGE CAPACITY	830	9/20/2017
TOWER RIDGE SUBDIVISION	IL1615780	1	ONLY ONE WELL	70	11/20/2020
VALLEY VIEW MANOR**	IL0195865	4	ONLY ONE WELL	120	1/27/2021
VAN ORIN WATER COMPANY	IL0115000	1	ONLY ONE WELL	100	1/27/2021
VICTORIA	IL0950550	5	ONLY ONE WELL	316	1/13/2021
WATER WERKS	IL1615130	1	ONLY ONE WELL	90	8/5/2020
WATERMAN	IL0370600	1	ONLY ONE WELL	1506	1/27/2021
WHITE HALL	IL0610400	6	INADEQUATE STORAGE CAPACITY	2900	10/1/2012
WINDCREST SUBDIVISION	IL0730040	1	ONLY ONE WELL	40	1/29/2021
WINDING CREEK ESTATES	IL1615850	1	ONLY ONE WELL	160	11/20/2020
WINSLOW	IL1770550	1	ONLY ONE WELL	350	12/2/2020
WITT	IL1350850	5	INADEQUATE TREATMENT CAPACITY	991	3/17/2008
YATES CITY	IL0950700	5	ONLY ONE WELL	750	1/13/2021
YOUNGS HILLCREST MHP	IL0190040	4	ONLY ONE WELL	34	1/27/2021

TABLE D

2022 Baseline Data from CR and Master NOV List

Deficiency Type	Amount
Only 1 Well	136
Lack of Certified Operator	15
Lead and Copper	13
Monitoring	13
DBP MCL	13
Manganese MCL	9
Treatment Capacity	8
Issue CCR	7
Radium MCL	4
Storage Capacity	4
Source Capacity (not well)	3
Managerial Capacity	3
MOR Submission	3
Maintain Cl ⁻ Residual	3
Cross Connection Program	3
Nitrate MCL	2
Material Inventory	2
Arsenic MCL	1
E. Coli MCL	1
Emergency Op Plan	1
Permit Needed	1
Back-up Power	1
Combined Filter Effluent	1
Chlorine MRDL	1
Well Abandonment	0

TABLE E

2023 Data from CR and Master NOV List

Deficiency Type	Amount
Only 1 Well	143
Certified Operator	10
Lead and Copper	7
Monitoring	10
DBP MCL	11
Manganese MCL	1
Plant Capacity	12
CCR	4
Radiological MCL	1
Storage Capacity	5
Source Capacity (not well)	4
Managerial Capacity	13
MOR Submission	23
Chlorination	10
Cross Connection Program	31
Nitrate MCL	0
Material Inventory	0
Arsenic MCL	0
E. Coli MCL	0
Emergency Op Plan	15
Permit Needed	11
Back-up Power	3
Flushing Program	16
Well Abandonment	1
Nitrification Action Plan	14
Flushing Program	16
Other Technical Deficiencies	15

Table F

**New Non-Community Water Supplies
From State FY 2021 Through FY 2023**

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11	Compliant with Certified Operator Requirement
IL3162651	Swedish Covenant Hospital	A	11-7-19 – P 2-10-22 - A	No	Yes
IL3162669	Nussbaum Properties #2	A	11-8-19 – P 2-16-22 - A	No	Yes
IL3162867	Loves Travel Stop	A	1-7-20 – P 1-18-22 - A	No	Yes
IL3163121	Blessing Hospital	P	4-22-20	No	Not Active
IL3163204	Tree House Foods	P	7-10-20	No	Not Active
IL3163147	SERENITY HOSPICE & HOME	A	7-22-20	No	Yes
IL3163287	Illinois Marine Towing	P	10-9-20	No	Not Active
IL3163311	Blunier Builders	P	10-30-20	No	Not Active
IL3163360	ST PETER LUTHERAN CHURCH/SONSHINE CHRIST	A	11-6-20 – 8-18-22 -changed to Transient System	No	N/A
IL3162883	WEDRON SILICA PIT BUILDING	A	11-10-20	No	Yes
IL3163188	US SILICA OTTAWA SOUTH PIT	A	11-25-20	No	Yes
IL3162354	CHICAGO AUTISM ACADEMY	A	11-25-20	No	Yes
IL3163527	Morris Hospital	P	12-3-20	No	Not Active
IL3162461	AVOCATE CHRIST MEDICAL CENTER	A	12-8-20	No	Yes
IL3163162	SPANCRETE INDUSTRIES INC.	A	12-8-20	No	Yes
IL3162131	JUGANDO SE APRENDE	A	12-17-20	No	Yes

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11	Compliant with Certified Operator Requirement
IL3162313	BRANDT INDUSTRIES USA LTD	A	12-28-20	No	Yes
IL3162610	ALLOY SPECIALTIES (10500320)	A	12-29-20	No	Yes
IL3163097	LAUNCH ENRICHMENT L3C	A	12-31-20	No	Yes
IL3163600	McHenry Hospital	P	1-8-21	No	Not Active
IL3162842	NORTHWESTERN COMM HOSP OUTPT CARE CTR	A	1-12-21	No	Yes
IL3161992	CATERPILLER - PEORIA PROVING GROUNDS	A	1-15-21	No	Yes
IL3163626	PHARMACANN	A	1-15-21	No	Yes
IL3163667	Alexian Brothers Medical Ctr	A	10-27-22	No	Yes
IL3162297	MEADOW LANE SCHOOL	A	4-2-21	No	Yes
IL3163725	Northwestern Medicine Woodstock Hospital	A	4-5-21 – P 2-9-22 - A	No	Yes
IL3161828	NORTHERN WHITE SANDS LLC	A	4-15-21	No	Yes
IL3163824	MULLER-PINEHURST DAIRY	A	4-21-21	No	Yes
IL3163832	THE MOSQUITO AUTHORITY	I	4-21-21 – P 1-6-22 - I	No	Not Active
IL3163875	CORE FX INGREDIENTS	A	4-23-21	No	Yes
IL3163519	RAY TRAPP - OFFICES/WAREHOUSE	I	5-20-21	No	Not Active
IL3164020	OSF St. Francis Hospital	P	5-21-21	No	Not Active
IL3163253	HIGHLAND PARK HOSPITAL	A	5-28-21	No	Yes
IL3164129	Sygenta	p	7-22-21	No	Not Active

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11	Compliant with Certified Operator Requirement
IL3164269	POPLAR GROVE AIRPORT	A	2-9-22	No	Yes
IL3162628	IN GROWN FARMS 2 LLC	A	2-9-22	No	Yes
IL3164350	ALUMI TANK INC	A	3-24-22	No	Yes
IL3164442	NUTRIEN AG SOLUTIONS	A	5-10-22	No	Yes
IL3163774	LOVES TRAVEL STOP	A	4-16-21 – P 7-7-22 – A	No	Yes
IL3164624	THE FORGE: LEMONT QUARRIES	A	8-10-22	No	Yes
IL3165027	GUIDEPOST MONTESSORI	A	7-12-23	No	Yes
IL3164640	Hampshire Farms	P	8-12-22 – P	No	Not Active
IL3164657	3804 N. Cunningham Property	P	8-12-22 – P	No	Not Active
IL3164673	Jesse Brown VA Medical Ctr.	P	8-16-22 – P	No	Not Active
IL3164905	Career Center of So. IL	P	4-3-23 – P	No	Not Active
IL3164913	OSF St Paul Medical Center	P	4-18-23 – P	No	Not Active
IL3165118	GFL IL - Elburn Transfer Station	P	7-26-23 – P	No	Not Active
IL3165134	Franciscan Sisters Medical Office	P	8-3-23 – P	No	Not Active
IL3165142	UofChicago AED	P	8-3-23 – P	No	Not Active
IL3165159	UofChicago CCD	P	8-3-23 - P	No	Not Active
IL3164269	POPLAR GROVE AIRPORT	A	2-9-22	No	Yes
IL3162628	IN GROWN FARMS 2 LLC	A	2-9-22	No	Yes
IL3164350	ALUMI TANK INC	A	3-24-22	No	Yes
IL3164442	NUTRIEN AG SOLUTIONS	A	5-10-22	No	Yes

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11	Compliant with Certified Operator Requirement
IL3163774	LOVES TRAVEL STOP	A	4-16-21 – P 7-7-22 – A	No	Yes
IL3164624	THE FORGE: LEMONT QUARRIES	A	8-10-22	No	Yes
IL3165027	GUIDEPOST MONTESSORI	A	7-12-23	No	Yes
IL3164640	Hampshire Farms	P	8-12-22 – P	No	Not Active
IL3164657	3804 N. Cunningham Property	P	8-12-22 – P	No	Not Active
IL3164673	Jesse Brown VA Medical Ctr.	P	8-16-22 – P	No	Not Active
IL3164905	Career Center of So. IL	P	4-3-23 – P	No	Not Active
IL3164913	OSF St Paul Medical Center	P	4-18-23 – P	No	Not Active
IL3165118	GFL IL - Elburn Transfer Station	P	7-26-23 – P	No	Not Active
IL3165134	Franciscan Sisters Medical Office	P	8-3-23 – P	No	Not Active
IL3165142	UofChicago AED	P	8-3-23 – P	No	Not Active
IL3165159	UofChicago CCD	P	8-3-23 - P	No	Not Active

TABLE G

NCPWS State FY 2023 Violations Issued *

NOV Issued	Facility Name	Facility ID Number	NOV Number	NOV Description
8/18/2022	AMERICAN LEGION POST 489	IL3029694	NV2022016	Nitrate M/R
10/14/2022	BALMORAL ELEM	IL3082024	NV2022052	Failure to have Qualified Operator
8/4/2022	BLACK MARINE INC CAMPGROUND	IL3134635	NV2022008	Nitrate M/R, Coliform M/R and 2021 SSU
8/18/2022	BRISTOL TAP	IL3138859	NV2022021	Nitrate M/R
9/7/2022	CAMP MATHIEU	IL3017814	NV2022015	Nitrate M/R, Coliform M/R and 2021/2022
9/16/2022	CAMP ONE WAY	IL3097790	NV2022034	Nitrate M/R and Nitrite M/R
10/21/2022	COG HILL COUNTRY CLUB	IL3088518	NV2022051	Failure to have Qualified Operator, PBCU M
8/18/2022	CROSSROADS CHURCH	IL3151415	NV2022022	Nitrate M/R
9/16/2022	DEER CREEK CAMPGROUND	IL3149484	NV2022035	Nitrate M/R, Coliform M/R and 2021/2022
6/16/2023	DIAMOND SLOTS	IL3114652	NV2023001	Nitrate MCL, Nitrate M/R, and Nitrite M/R
9/21/2022	DUNHAM WOODS RIDING CLUB	IL3068510	NV2022038	Coliform M/R
8/4/2022	ERIE CAMPGROUND	IL3097931	NV2022003	Nitrate M/R
9/30/2022	EUREKA SPORTSMENS CLUB	IL3058628	NV2022037	2021/2022 SSU
10/17/2022	FOUR WILLOWS GOLF COURSE	IL3130997	NV2022028	Nitrate M/R (2018/2019)
8/4/2022	GAMBER COVE	IL3069104	NV2022004	Nitrate M/R

8/3/2022	GLENWOOD RV RESORT	IL3000711	NV2022001	Nitrate M/R and 2021 SSU
8/4/2022	GLENWOOD RV RESORT (120832)	IL3120832	NV2022006	Nitrate M/R and 2021 SSU
9/22/2022	GRASS LAKE MARINA	IL3120782	NV2022026	Coliform M/R and 2021/2022 SSU
9/30/2022	HI VU MOTEL	IL3096255	NV2022041	Nitrate M/R
9/30/2022	JIMBOS TAVERN	IL3103135	NV2022042	Nitrate M/R
10/25/2022	JUGANDO SE APRENDE	IL3162131	NV2022045	All Monitoring and Operator Violations add
9/1/2022	JW MARRIOT HOTEL	IL3156836	NV2022032	PBCU M/R, Failure to have Qualified Opera
8/4/2022	LAKE RAWSON	IL3021907	NV2022002	Nitrate M/R, Coliform M/R, and 2021 SSU
9/1/2022	LAKEWOOD HILLS BEACH	IL3122440	NV2022027	Nitrate M/R and 2021/2022 SSU
9/30/2022	LEDGES SWIM CLUB	IL3124891	NV2022043	Nitrate M/R, Coliform M/R and 2022 SSU
9/22/2022	MARY ANN BEEBE CTR/ACTIVITY CTR (18226)	IL3018226	NV2022039	2022 SSU
8/3/2022	MOONS LITTLE ACRES	IL3017517	NV2022005	Nitrate M/R
9/30/2022	MOSYS BAR AND GRILL	IL3161220	NV2022044	Nitrate M/R
10/14/2022	MOTHER TERESA CATHOLIC ACADEMY	IL3024281	NV2022046	Failure to have Qualified Operator
8/18/2022	P N A YOUTH CAMP ASSN	IL3033449	NV2022017	Coliform M/R and 2021/2022 SSU
9/16/2022	PONDEROSA WILDERNESS AREA	IL3010611	NV2022036	2021/2022 SSU
10/21/2022	SMOKIN'Z BBQ LLC	IL3164111	NV2022054	Failure to have Qualified Operator, Initial P
8/4/2022	STEITZS RESORT	IL3023242	NV2022010	Nitrate M/R and Coliform M/R
10/21/2022	TALEEM UL HAQ	IL3161752	NV2022048	Failure to have Qualified Operator, Lead Co M/R
10/21/2022	TPG PRESSURE, INC.	IL3046318	NV2022053	Failure to have Qualified Operator
10/21/2022	TPG PRESSURE, INC. - WEST WELL	IL3153924	NV2022049	Failure to have Qualified Operator, Follow-
8/3/2022	TRENTON SPORTSMAN CLUB	IL3002121	NV2022014	Nitrate M/R
10/6/2022	WEBBS VALLEY VIEW CAMPGROUND	IL3122275	NV2022007	Nitrate M/R
8/4/2022	WILDWOOD CAMPGROUND	IL3057646	NV2022012	Nitrate M/R

**If more than one violation occurred at a facility, each type of violation is counted in baseline data in Table H*

TABLE H (State Fiscal Year 2023 Data from Master NOV List)

Violation Type	Amount
ARSENIC MONITORING, ROUTINE MAJOR	
CHLORINE MONITORING, ROUTINE MAJOR	
QUALIFIED OPERATOR FAILURE	9
E. COLI MONITORING, ROUTINE MAJOR	8
IOCS MONITORING, ROUTINE MAJOR	
FOLLOW-UP OR ROUTINE TAP M/R (LCR)	5
INITIAL TAP SAMPLING (LCR)	1
LEAD CONSUMER NOTICE (LCR)	1
NITRATE MCL	1
NITRATE MONITORING, ROUTINE MAJOR	24
NITRITE MONITORING, ROUTINE MAJOR	2
PUBLIC NOTICE	3
STARTUP PROCEDURES TT (RTCR)	11
SOC MONITORING, ROUTINE MAJOR	3
TOTAL THM-HAA5 MONITORING, ROUTINE MAJOR	1

Violation Type	Amount
VOCS MONITORING, ROUTINE MAJOR	1

TMF PRE-SCREENING SURVEY

Public Water Supply Name: [Click or tap here to enter text.](#)

Facility ID #: [Click or tap here to enter text.](#)

Date: [Click or tap here to enter text.](#)

Prepared by: [Click or tap here to enter text.](#)



TECHNICAL CAPACITY

Record your system's total annual <u>pumpage</u> for the past year (gallons): Click or tap here to enter text.	
Record peak 7-day week of <u>pumpage</u> (gallons): Click or tap here to enter text. Dates: Click or tap here to enter text.	
List the amount of water billed or sold to customers for the past year (gallons): Click or tap here to enter text.	
Number of service connections: Click or tap here to enter text.	
Population served: Click or tap here to enter text.	
List plant capacity (GPD): Click or tap here to enter text.	
List total well capacity (GPD): Click or tap here to enter text.	
List total well capacity with largest well out of service (GPD): Click or tap here to enter text.	
Is standby/emergency power equipment exercised?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
If yes, specify the source of stand-by power and associated kW rating: Click or tap here to enter text.	
Is emergency power in place to operate both the source and plant to meet average day demand?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Is emergency power in place to operate all booster stations necessary to maintain pressure?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Frequency of exercise: <input type="checkbox"/> Weekly <input type="checkbox"/> Monthly <input type="checkbox"/> Quarterly <input type="checkbox"/> Annual <input type="checkbox"/> Other - Click or tap here to enter text.	
Can your system provide uninterrupted water service for 24 hours without electrical power?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Is there any water main less than 3 inches (if in rural area) or 4 inches (if in urban area)?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Total length of water mains (miles): Click or tap here to enter text.	
Length of water main replaced in the past three years (miles): Click or tap here to enter text.	
Number of water main repairs in the past three years: Click or tap here to enter text.	
Are hydrants routinely flushed and maintained?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Flush frequency: <input type="checkbox"/> Annual <input type="checkbox"/> Spring/Fall <input type="checkbox"/> As Needed <input type="checkbox"/> Other - Click or tap here to enter text.	
List the number of dead ends in the distribution without flushing devices: - Click or tap here to enter text.	
Does the system practice unidirectional flushing?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are the locations of all valves in the distribution system precisely known?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Is there adequate valving to allow for isolation and facilitate unidirectional flushing?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are all valves periodically exercised and maintained?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Is a maintenance log for valves maintained?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
List valve exercising frequency: Click or tap here to enter text.	
Are locations, size and type of mains and valves detailed on records or maps kept in a secure area?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are meter pits and curb <u>stops</u> located, unobstructed and accessible?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Models of all test kits used for water quality monitoring: Click or tap here to enter text.	
List amount of water unaccounted for (%): Click or tap here to enter text.	
Are all customers, water sources and treatment plants metered?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
List the frequency of meter calibration: Click or tap here to enter text.	
What is the average age of meters in the distribution system? (years): Click or tap here to enter text.	
Is your treatment equipment adequate to provide drinking water that meets all drinking water standards?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
List the name of the satellites served: Click or tap here to enter text.	
List the names of all emergency interconnections: Click or tap here to enter text.	
Under normal conditions, what is the range of distribution pressure? (psi): Click or tap here to enter text.	
Is the distribution pressure always above 20 psi during large usage events?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

MANAGERIAL CAPACITY

Is there a clear plan of organization and control among the system's managers and operators?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are there contingency plans in place for unanticipated loss of key personnel?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Is a written emergency response plan in place and up to date?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Is the emergency response plan reviewed at least every three years and revised, if necessary?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Does the emergency response plan provide alternate sources of water during emergencies?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
What type of alternate water sources are provided? (<u>bottled</u> water, haulers, etc.) Click or tap here to enter text.	
Are employees and water system officials encouraged to attend conferences and seminars to stay current with Public Water Supply requirements and technology?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Does the utility perform inspections of work performed on the system by outside contractors?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are construction permits obtained prior to starting water supply projects that require a permit?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are operating permits obtained before placing those improvements into service?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Do you maintain copies of all water sample results, operating reports and inspection reports?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Do you issue boil water orders when pressure drops below 20 psi or contamination is suspected?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Do you notify the IEPA Regional Office when boil water orders are issued?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Do you notify the local county health department when boil water orders are issued?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
How many boil water orders were issued in the last 12 months? Click or tap here to enter text.	
Describe the boil water order sampling procedures: Click or tap here to enter text.	
Do you have a cross-connection control program?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are the cross-connection surveys reviewed after they are returned?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Is the cross-connection program enforced? (<u>example</u> : shutting off water if not in compliance)	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Do you maintain an inventory of all installed backflow assemblies?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Do you maintain a tracking system to ensure backflow assemblies are tested at least annually?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Do you maintain copies of the test results of all backflow assemblies?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are the backflow assemblies owned by the system tested at least annually with a tag indicating the testing date?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Where are the cross-connection survey results and records kept? Click or tap here to enter text.	
When was the last cross connection survey done (required every 3 years)? Click or tap here to enter text.	
Please describe any climate resiliency measures implemented at your water system (<u>e.g.</u> drought measures, flood control, etc.): Click or tap here to enter text.	
Does your water system use operational technology?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
If yes, are there any cybersecurity measures in place (<u>e.g.</u> password minimum length, multi-factor authorization, etc.)?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Please describe the cybersecurity measures, if any: Click or tap here to enter text.	

FINANCIAL CAPACITY

Does your organization have an annual budget for operating and maintaining the water system?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are the water rates regularly reviewed? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A Date of the last increase: Click or tap here to enter text.	
Does your water system generate sufficient revenue to meet estimated expenses during the current and forecasted budget years?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are adequate reserve funds in place to provide for emergency repairs?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Can your organization cover the costs of an emergency or failure of its most vulnerable component?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Does your organization have a 5-year Capital Improvement Plan for major water system improvements?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are your rates sufficient to meet the costs of the 5-year Capital Improvement Plan?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Does your organization have procedures for selecting outside contractors and suppliers?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

ASSET MANAGEMENT

Does your water system have an asset management plan in place?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
If yes, when was the asset management plan last <u>updated</u> ? Click or tap here to enter text.	
Is the asset management plan actively <u>utilized</u> ? Click or tap here to enter text.	
Does the asset management plan define level of service goals?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Does the asset management plan include an inventory of the water system's current assets?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Does the asset management plan rank the criticality of each asset?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Does the asset management plan include an operation and maintenance plan for the water system?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Does the asset management plan include a capital improvement plan?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Does the asset management plan include a long-term financial strategy?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

