

BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

| | | |
|------------------------|---|----------------------|
| TRI-COUNTY ELECTRIC |) | |
| COOPERATIVE, INC. |) | |
| Petitioner, |) | |
| v. |) | PCB _____ |
| |) | (LUST Permit Appeal) |
| ILLINOIS ENVIRONMENTAL |) | |
| PROTECTION AGENCY, |) | |
| Respondent. |) | |

NOTICE OF FILING AND PROOF OF SERVICE

| | | |
|-----|--|--|
| To: | John T. Therriault, Acting Clerk | Division of Legal Counsel |
| | Illinois Pollution Control Board | Illinois Environmental Protection Agency |
| | 100 West Randolph Street | 1021 North Grand Avenue East |
| | State of Illinois Building, Suite 11-500 | P.O. Box 19276 |
| | Chicago, IL 60601 | Springfield, IL 62794-9276 |

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Illinois Pollution Control Board, pursuant to Board Procedural Rule 101.302 (d), a PETITION FOR REVIEW OF THE AGENCY LUST DECISION, a copy of which is herewith served upon the attorneys of record in this cause.

The undersigned hereby certifies that a true and correct copy of this Notice of Filing, together with a copy of the document described above, were today served upon counsel of record of all parties to this cause by enclosing same in envelopes addressed to such attorneys with postage fully prepaid, and by depositing said envelopes in a U.S. Post Office Mailbox in Springfield, Illinois on the 28th day of November, 2016.

Respectfully submitted,
TRI-COUNTY ELECTRIC COOPERATIVE, INC.,
Petitioner

BY: LAW OFFICE OF PATRICK D. SHAW

BY: /s/ Patrick D. Shaw

Patrick D. Shaw
LAW OFFICE OF PATRICK D. SHAW
80 Bellerive Road
Springfield, IL 62704
217-299-8484
pdshaw1law@gmail.com

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

| | | |
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| TRI-COUNTY ELECTRIC COOPERATIVE, INC.,) |) | |
| Petitioner, |) | |
| |) | |
| v. |) | PCB _____ |
| |) | (LUST Permit Appeal) |
| ILLINOIS ENVIRONMENTAL |) | |
| PROTECTION AGENCY, |) | |
| Respondent. |) | |

PETITION FOR REVIEW OF AGENCY LUST DECISION

NOW COMES Petitioner, TRI-COUNTY ELECTRIC COOPERATIVE, INC., pursuant to Sections 57.7(c)(4) and 57.8(i) of the Illinois Environmental Protection Act, 415 ILCS 5/57.7(c)(4) & 5/57.8(i), and hereby appeals the Agency’s final decision, refusing to approve the actual costs for Stage 1 Site Investigation, and in support thereof states as follows:

1. This appeal arises from releases of gasoline and diesel fuel from tanks formerly located at a facility owned and operated by the TRI-COUNTY ELECTRIC COOPERATIVE, INC. in Mt. Vernon, County of Jackson, Illinois, and assigned LPC # 0810305006.

2. The releases were reported on February 10, 2015, and assigned Incident # 20150139.

3. Thereafter, the tanks were removed and early action activities performed. On April 13, 2015, Petitioner, through its consultant, submitted a 45-day report, detailing early action work performed and concluding that insufficient information existed to demonstrate that applicable remediation objectives have been achieved. Pursuant to the Agency’s form, certification of the 45-day report constituted approval of the Stage One Site Investigation Plan and Budget, though no planning or financial information was submitted at that time.

4. On April 28, 2015, the Agency approved the 45-day report, as well as the Stage

One Site Investigation Plan and Budget.

5. Thereafter, Petitioner's consultants performed Stage One Site Investigation work, and on September 12, 2016, submitted to the Agency the Site Investigation Completion Report & Stage 1 Site Investigation Actual Costs.

6. The actual costs budget detailed the actual costs incurred performing the work required by the Board's regulations, within maximum rates at the time the work was performed.

7. The consultant performed this work on a "time and materials" basis with \$1,145.00 incurred in consulting materials costs. To wit:

| | |
|--------------------------------------|----------|
| Vehicle and mileage..... | \$445.00 |
| Survey Equipment. | \$150.00 |
| Pump Test Equipment. | \$150.00 |
| Photoionization detector (PID). | \$135.00 |
| Bailers. | \$125.00 |
| Water level indicator. | \$90.00 |
| Camera..... | \$30.00 |
| Decon Equipment | \$20.00 |

8. The rates for these consulting materials have consistently been approved in previous budgets and reimbursement requests made by Petitioner's consultant.

9. On October 19, 2016, the Agency issued its decision, approving the Site Investigation Completion Report, and modifying the actual costs budget by (a) reducing hourly rates to the maximum payment amounts when the budget was approved on April 28, 2015, and (b) eliminating reimbursement for all of the above consultant's materials as lacking supporting

documentation and “unreasonable as submitted.” A true and correct copy of the letter is attached hereto as Exhibit A.

10. The personnel rates should be reinstated as they did not exceed maximum payment amounts at the time the work was performed. Pursuant to the Board’s regulations, the certification used in lieu of a budget imposes a future obligation:

A budget for a Stage 1 site investigation must consist of a certification signed by the owner or operator, and by a Licensed Professional Engineer or Licensed Professional Geologist, that the costs of the Stage 1 site investigation will not exceed the amounts set forth in Subpart H of this Part.

(35 Ill. Adm. Code § 734.310(b) (emphasis added))

11. Furthermore, the Board’s regulations provide that maximum payment amounts are to be based on the date the costs are incurred:

For costs not approved by the Agency in writing prior to the date the costs are incurred, including, but not limited to, early action costs, the applicable maximum payment amounts must be the amounts in effect on the date the costs were incurred.

(35 Ill. Adm. Code 734.870(d)(2))

12. With respect to the consulting materials, the denial letter states for each item (other than for the water level indicator), that “[t]he Agency has requested additional documentation to support the rate requested for [material] pursuant to 35 Ill. Adm. Code 734.505(a). The documentation was either not provided or fails to provide sufficient information for the Agency to make a site specific reasonableness determination . ” (Ex. A)

13. Consultant has not been able to identify any such Agency requests in its records related to this site. Moreover, the denial letter fails to offer an explanation of "the specific type of information, if any, that the Agency needs to complete the review." (35 Ill. Adm. Code §

734.505(b)) Indeed, the denial letter does not appear to know whether the information was provided or was provided, but insufficient, strongly suggesting it was never even requested.

14. The actual costs budget was legally complete, containing all of the information required by the Illinois Environmental Protection Act, the Board's Part 734 regulations, and Illinois EPA forms and instructions existing at the time of the submittal.

15. All of the consulting materials, with the exception of the pump test equipment, are specifically listed as types of consultant's materials which are reimbursable costs in the Agency's Instructions for the Budget and Billing Forms.

16. All of the consulting materials costs incurred were reasonable as they were based upon rates that had consistently been approved in previous budgets and reimbursement requests made by Petitioner's consultant and they do not exceed any maximum payment amount established in Subpart H of the Board's regulations (35 Ill. Adm. Code § 734.800 *et seq.*).

17. No statutory or regulatory provision would be violated by approving payment of the consulting material costs incurred herein.

18. The subject Illinois EPA letter was received by certified mail on October 24, 2016, which is 35 days from the date this appeal is being filed, and therefore timely.

WHEREFORE, Petitioner, TRI-COUNTY ELECTRIC COOPERATIVE, INC., prays that: (a) the Agency produce the Record; (b) a hearing be held; (c) the Board find the Agency erred in its decision, (d) the Board direct the Agency to approve the actual costs budget as submitted, (e) the Board award payment of attorney's fees; and (f) the Board grant Petitioner such other and further relief as it deems meet and just.

TRI-COUNTY ELECTRIC COOPERATIVE, INC.,

Petitioner

By its attorneys,
LAW OFFICE OF PATRICK D. SHAW

By: /s/ Patrick D. Shaw

Patrick D. Shaw
LAW OFFICE OF PATRICK D. SHAW
80 Bellerive Road
Springfield, IL 62704
217-299-8484
pdshaw1law@gmail.com

THIS FILING IS SUBMITTED ON RECYCLED PAPER



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397
BRUCE RAUNER, GOVERNOR ALEC MESSINA, ACTING DIRECTOR

RECEIVED
RIPSTIC
11/14/2016

217/524-3300

CERTIFIED MAIL Tri-County Electric

OCT 19 2016

7014 2120 0002 3290 1457

Tri-County Electric Company
Attn: Brad Austin
3906 West Broadway
Mt. Vernon, IL 62864

Re: LPC #0810305006 -- Jefferson County
Mt. Vernon/Tri-County Electric Company
3906 W. Broadway
Leaking UST Incident No. 20150139
Leaking UST Technical File

Dear Mr. Austin:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the Site Investigation Completion Report (report) submitted for the above-referenced incident. This report, dated September 12, 2016, was received by the Illinois EPA on September 14, 2016. Citations in this letter are from the Environmental Protection Act (415 ILCS 5) (Act) and Title 35 of the Illinois Administrative Code (35 Ill. Adm. Code).

The Illinois EPA has determined that the requirements of Title XVI of the Act have been satisfied (Sections 57.7(a)(5) and 57.7(c) of the Act and 35 Ill. Adm. Code 734.505(b) and 734.510(a)). Therefore, the report is approved.

In addition, the actual costs budget for Stage 1 is modified pursuant to Sections 57.7(a)(2) and 57.7(c) of the Act and 35 Ill. Adm. Code 734.505(b) and 734.510(b). Based on the modifications listed in Section 2 of Attachment A, the amounts listed in Section 1 of Attachment A are approved. Be aware that the amount of payment from the Fund may be limited by Sections 57.8(d), 57.8(e), and 57.8(g) of the Act, as well as 35 Ill. Adm. Code 734.630 and 734.655.

Pursuant to Sections 57.7(b)(2) and (3) and 57.12(c) and (d) of the Act and 35 Ill. Adm. Code 734.100, 734.125, and 734.335(a), the Illinois EPA requires submittal of a Corrective Action Plan and budget within 30 days from the date of this letter to:

EXHIBIT
A

Page 1

Illinois Environmental Protection Agency
Bureau of Land - #24
Leaking Underground Storage Tank Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, IL 62794-9276

Please note that the Illinois EPA does not require the submission of a budget if the owner or operator does not intend to seek payment from the Underground Storage Tank Fund.

Please submit all correspondence in duplicate and include the Re: block shown at the beginning of this letter.

An underground storage tank system owner or operator may appeal this decision to the Illinois Pollution Control Board. Appeal rights are attached.

If you have any questions or need further assistance, please contact Scott McGill at (217) 524-5137.

Sincerely,



Michael T. Lowder
Unit Manager
Leaking Underground Storage Tank Section
Division of Remediation Management
Bureau of Land

Attachment: Attachment A
Appeal Rights

cc: Chase Environmental Group, Inc.
BOL File

Attachment A

Re: LPC #0810305006 – Jefferson County
Mt. Vernon/Tri-County Electric Company
3906 W. Broadway
Leaking UST Incident No. 20150139
Leaking UST Technical File

SECTION 1

STAGE 1 Actual Costs

As a result of the Illinois EPA's modifications in Section 2 of this Attachment A, the following amounts are approved:

| | |
|-------------|--|
| \$2,897.97 | Drilling and Monitoring Well Costs |
| \$3,104.56 | Analytical Costs |
| \$929.37 | Remediation and Disposal Costs |
| \$0.00 | UST Removal and Abandonment Costs |
| \$0.00 | Paving, Demolition, and Well Abandonment Costs |
| \$14,930.63 | Consulting Personnel Costs |
| \$231.99 | Consultant's Materials Costs |

Handling charges will be determined at the time a billing package is reviewed by the Illinois EPA. The amount of allowable handling charges will be determined in accordance with Section 57.1(a) of the Environmental Protection Act (Act) and 35 Illinois Administrative Code (35 Ill. Adm. Code) 734.635.

SECTION 2

STAGE 1 Modifications

1. The Senior Project Manager rate has been reduced to \$121.49 per hour. The costs exceed the maximum payment amounts set forth in Subpart H, Appendix D, and/or Appendix E of 35 Ill. Adm. Code 734. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(zz). In addition, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they are not reasonable.
2. The Senior Scientist rate has been reduced to \$103.26 per hour. The costs exceed the maximum payment amounts set forth in Subpart H, Appendix D, and/or Appendix E of 35 Ill. Adm. Code 734. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(zz). In addition, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they are not reasonable.

3. The Geologist III rate has been reduced to \$106.91 per hour. The costs exceed the maximum payment amounts set forth in Subpart H, Appendix D, and/or Appendix E of 35 Ill. Adm. Code 734. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(zz). In addition, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they are not reasonable.
4. The Senior Draftperson/CAD rate has been reduced to \$72.88 per hour. The costs exceed the maximum payment amounts set forth in Subpart H, Appendix D, and/or Appendix E of 35 Ill. Adm. Code 734. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(zz). In addition, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they are not reasonable.
5. The Senior Acct. Technician rate has been reduced to \$66.81 per hour. The costs exceed the maximum payment amounts set forth in Subpart H, Appendix D, and/or Appendix E of 35 Ill. Adm. Code 734. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(zz). In addition, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they are not reasonable.
6. \$445.00 for costs for vehicle charges, which lack supporting documentation. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.

Pursuant to 35 Ill. Adm. Code 734.850(b) costs associated with activities that do not have a maximum payment amount set forth pursuant to 35 Ill. Adm. Code 734 Subpart H must be determined on a site specific basis and the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable. The Agency has requested additional documentation to support the rate requested for vehicle charges pursuant to 35 Ill. Adm. Code 734.505(a). The documentation was either not provided or fails to provide sufficient information for the Agency to make a site specific reasonableness determination.

In addition, without supporting documentation the rate requested for vehicle costs is not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

7. \$135.00 for costs for PID, which lack supporting documentation. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act. Therefore, such costs are not approved pursuant to

Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.

Pursuant to 35 Ill. Adm. Code 734.850(b) costs associated with activities that do not have a maximum payment amount set forth pursuant to 35 Ill. Adm. Code 734 Subpart H must be determined on a site specific basis and the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable. The Agency has requested additional documentation to support the rate requested for a PID pursuant to 35 Ill. Adm. Code 734.505(a). The documentation was either not provided or fails to provide sufficient information for the Agency to make a site specific reasonableness determination.

In addition, without supporting documentation for the rate requested for the PID costs are not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

8. \$90.00 for costs for water level indicator, which lack supporting documentation. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.
9. \$150.00 for costs for Survey Equipment, which lack supporting documentation. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.

Pursuant to 35 Ill. Adm. Code 734.850(b) costs associated with activities that do not have a maximum payment amount set forth pursuant to 35 Ill. Adm. Code 734 Subpart H must be determined on a site specific basis and the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable. The Agency has requested additional documentation to support the rate requested for Survey Equipment pursuant to 35 Ill. Adm. Code 734.505(a). The documentation was either not provided or fails to provide sufficient information for the Agency to make a site specific reasonableness determination.

In addition, without supporting documentation the rate requested for the Survey Equipment is not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

10. \$30.00 for costs for camera, which lack supporting documentation. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.

Pursuant to 35 Ill. Adm. Code 734.850(b) costs associated with activities that do not have a maximum payment amount set forth pursuant to 35 Ill. Adm. Code 734 Subpart H must be determined on a site specific basis and the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable. The Agency has requested additional documentation to support the rate requested for Pump Test Equipment pursuant to 35 Ill. Adm. Code 734.505(a). The documentation was either not provided or fails to provide sufficient information for the Agency to make a site specific reasonableness determination.

In addition, without supporting documentation the rate requested for the camera is not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

11. \$125.00 for costs for Bailer, which lack supporting documentation. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.

Pursuant to 35 Ill. Adm. Code 734.850(b) costs associated with activities that do not have a maximum payment amount set forth pursuant to 35 Ill. Adm. Code 734 Subpart H must be determined on a site specific basis and the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable. The Agency has requested additional documentation to support the rate requested for Pump Test Equipment pursuant to 35 Ill. Adm. Code 734.505(a). The documentation was either not provided or fails to provide sufficient information for the Agency to make a site specific reasonableness determination.

In addition, without supporting documentation the rate requested for the Bailer is not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

12. \$150.00 for costs for Pump Test Equipment, which lack supporting documentation. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.

Pursuant to 35 Ill. Adm. Code 734.850(b) costs associated with activities that do not have a maximum payment amount set forth pursuant to 35 Ill. Adm. Code 734 Subpart H must be determined on a site specific basis and the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable. The Agency has requested additional documentation to support the rate requested for Pump Test Equipment pursuant to 35 Ill. Adm. Code 734.505(a). The documentation was either not provided or fails to provide sufficient information for the Agency to make a site specific reasonableness determination.

In addition, without supporting documentation the rate requested for the Pump Test Equipment is not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

13. \$20.00 for costs for Decon Equipment, which lack supporting documentation. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.

Pursuant to 35 Ill. Adm. Code 734.850(b) costs associated with activities that do not have a maximum payment amount set forth pursuant to 35 Ill. Adm. Code 734 Subpart H must be determined on a site specific basis and the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable. The Agency has requested additional documentation to support the rate requested for Decon Equipment pursuant to 35 Ill. Adm. Code 734.505(a). The documentation was either not provided or fails to provide sufficient information for the Agency to make a site specific reasonableness determination.

In addition, without supporting documentation the rate requested for the Decon Equipment is not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

Appeal Rights

An underground storage tank owner or operator may appeal this final decision to the Illinois Pollution Control Board pursuant to Sections 40 and 57.7(c)(4) of the Act by filing a petition for a hearing within 35 days after the date of issuance of the final decision. However, the 35-day period may be extended for a period of time not to exceed 90 days by written notice from the owner or operator and the Illinois EPA within the initial 35-day appeal period. If the owner or operator wishes to receive a 90-day extension, a written request that includes a statement of the date the final decision was received, along with a copy of this decision, must be sent to the Illinois EPA as soon as possible.

For information regarding the filing of an appeal, please contact:

John Therriault, Assistant Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, IL 60601
312/814-3620

For information regarding the filing of an extension, please contact:

Illinois Environmental Protection Agency
Division of Legal Counsel
1021 North Grand Avenue East
Post Office Box 19276
Springfield, IL 62794-9276
217/782-5544