

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF: )  
)  
PUBLIC WATER SUPPLIES: ) R18-17  
PROPOSED NEW 35 ILL. ADM )  
CODE 604 AND AMENDMENTS. ) (Rulemaking- Water)  
TO 35 ILL. ADM CODE PARTS 601, )  
602, 607 AND 611 )

**NOTICE OF FILING**

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board ILLINOIS EPA'S RESPONSE TO PUBLIC COMMENTS ONE THROUGH SIX a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/Rex L. Gradeless  
Rex L. Gradeless  
Assistant Counsel  
Division of Legal Counsel

Date: November 1, 2017

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P.O. Box 19276  
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**THIS FILING IS SUBMITTED ELECTRONICALLY AND SERVED ON RECYCLED PAPER**

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**ILLINOIS EPA’S RESPONSE TO PUBLIC COMMENTS**  
**ONE THROUGH SIX**

NOW COMES the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, (“Illinois EPA” or “Agency”) by and through its counsel, and for response to public comments one through six, states as follows:

- 1) Prior to the October 17, 2017, public hearing, six public comments were filed with the Pollution Control Board (“Board” or “PCB”).
- 2) Public comment one was filed with the Board on October 5, 2017, by Executive Director, Beverly A. Potts, on behalf of the Illinois Plumbing, Heating, Cooling Contractors Association.
- 3) Public comment two was filed with the Board on October 5, 2017, by Committee Chairman, Richard Marvel, on behalf of the Illinois Section of the American Water Works Association.
- 4) Public comment three was filed with the Board on October 5, 2017, by Northern Illinois Chapter President, Michael Body, on behalf of the Northern Illinois Chapter of the American Backflow Prevention Association.

- 5) Public comment four was filed with the Board on October 5, 2017, by Northern Illinois Chapter President, Michael Body, on behalf of the Illinois Section of American Backflow Prevention Association.
- 6) Public comment five was filed with the Board on October 10, 2017, by Executive Director, Thomas Palkon, and Professional Qualifications Director, Marianne C. Waickman, on behalf of the American Society of Sanitary Engineering International.
- 7) Public comment six was filed with the Board on October 10, 2017, by Chairman of the Illinois Section of the American Water Works Association's Backflow Committee, Gary W. Howard, on behalf of the Illinois Chapter of the American Society of Sanitary Engineering International.
- 8) The Illinois EPA responds to these public comments in the attached Exhibit A.

Wherefore, the Illinois EPA respectfully submits its response to public comments one through six.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/Rex L. Gradeless  
Rex L. Gradeless  
Assistant Counsel  
Division of Legal Counsel

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**EXHIBIT A – AGENCY’S RESPONSE TO PUBLIC COMMENTS ONE THROUGH SIX**

**1) AGENCY RESPONSE TO PUBLIC COMMENT ONE:**

**1: In 604.1500 thru 604.1515, the term "backflow prevention device (s)" is used throughout the proposed section. We would like to propose that "backflow prevention device (s)" be changed to "backflow preventer" to be consistent with Illinois Plumbing Code Section 890.120 definition.**

Agency Response: The Agency does not object to this proposed change.

**2. We would like to recommend that throughout Section 604.1510 "Cross Connection Control Device Inspectors (CCCDI)" be changed to "Certified Cross Connection Control Device Tester". This would make the title of those doing this work in Illinois consistent with what is being used across the country in the backflow industry. Groups such as the following use the word tester as opposed to inspector: American Backflow Prevention Association (ABPA), American Society of Sanitary Engineers (ASSE), American Water Works Association (A W W A), Backflow Prevention Manufacturers Association (BPMA), University of Southern California's Foundation for Cross Connection Control and Hydraulic Research (USCFCCCHR), International Association of Plumbing & Mechanical Officials (IAPMO), and the International Code Council (ICC). In addition, we would request that the word "inspect" be replaced with the word "test" where it appears throughout Subpart 0. Backflow devices are being tested to ensure their proper workability. This is not an inspection, but an actual physical test.**

Agency Response: The Agency does not believe a change to proposed Section 604.1510 is necessary. Further, CCCDI has been used in Illinois for at least two decades and is familiar to both the plumbing and water supply professions. Proposed Section 604.1510(a) clearly delineates what the term inspection relates to in the context of this proposed Board Regulation: “Except as provided in subsection (c) cross-connection control devices must be inspected annually by a person approved by the Agency or its designee as a cross-connection control device inspector (CCCDI). *The inspection of the mechanical devices shall include physical testing in accordance with the manufacturer’s instructions* (emphasis added).”

**3. 604.1500 a), states "No cross connection shall be allowed between water plant piping and any drain or sewer". We propose an addition to the language to state, "No cross connection shall be allowed between water plant piping and any non-potable source, drain, or sewer."**

Agency Response: The Agency does not believe a change to proposed Section 604.1500 is necessary. In proposed Section 601.105, the definition of “Cross-connection” means any physical connection or arrangement between two otherwise separate piping systems where flow from one system to the other is possible. With the context of this definition, the Agency believes the intent of proposed Section 604.1500 is clear.

**4. Section 604.1510 a)1) requires that records of the annual testing must be**

submitted to the community water supply. We feel it would be of benefit to add that those reports be submitted within 10 business days of the test. Timely reporting is important for the CWS to be informed of what is being properly protected and what potential hazards may exist.

Agency Response: The Agency believes that this level of detail is more appropriately addressed by local government. Proposed Section 604.1505(b)(3) requires an ordinance, tariff, or required condition for service whichever is applicable which meets the Illinois Plumbing Code, 77 Ill. Adm. Code 890, shall be adopted and enforced. For the cross connection control program to be effective local entities must be responsible for the program, and the Agency believes that this timeliness issue is best addressed at that level.

**5. We would like to see the following items added to requirements under Section 604.1510 a)3):**

- 1. name and registration number of the registered plumbing contractor employing the person conducting the test. In order to be a registered plumbing contractor with IDPH, contractors must show proof of proper insurance and bonding. This is an additional consumer protection.**
- 2. a definitive statement of Pass or Fail in addition to the actual test results.**
- 3. type of test kit being used and the most recent date of calibration.**
- 4. what the device is serving/protecting.**
- 5. is the device used for isolation or containment.**
- 6. location of the device on the premises.**
- 7. make, model, and serial number of the backflow preventer.**

Agency Response: The Agency does not object to the addition of the items. However, this level of detail may be more appropriately addressed by local government through an ordinance, tariff, or required condition for service whichever is applicable.

**6. Creating a Section 604.1510 4) to require that all devices that fail upon testing be repaired within 30 days of the detected failure or water service to the customer will be terminated, will ensure that the potential hazard is mitigated as soon as possible.**

Agency Response: The Agency believes that this level of detail is more appropriately addressed by local government. Proposed Section 604.1505(b)(3) requires an ordinance, tariff, or required condition for service whichever is applicable which meets the Illinois Plumbing Code, 77 Ill. Adm. Code 890, shall be adopted and enforced. For the cross connection control program to be effective local entities must be responsible for the program, and the Agency believes that this timeliness issue is best addressed at that level.

**7(a). Section 604.1510 b) spells out the requirements to be a backflow tester. We recommend the following changes/additions to those requirements. 604.1510 1 ) a) change to read "Must meet the qualifications of a person authorized to perform plumbing as defined in the Illinois Plumbing License Law, 225 ILCS 320/3(1). The language currently states that the person must meet the qualifications to inspect plumbing and is not accurate**

**for this application.**

Agency Response: The Agency concurs with this recommendation and proposes the following change to proposed Section 604.1510(b)(1)(A):

b) Requirements for Cross-Connection Control Device Inspector Approval

1) Each applicant for cross-connection control device inspector (CCCDI) approval must meet the following qualifications:

A) Must ~~meet the qualifications to inspect plumbing and plumbing systems~~ be a person authorized to perform plumbing as described in the Illinois Plumbing License Law, 225 ILCS 320/3(1).

**7(b). 604.1510 b) 1) B) mandates that all training to become a CCCDI must be completed by the Environmental Resource Training Center (ERTC). While we highly respect ERTC and the work that they do, we are concerned that at some point in the future they may lack funding and/or staff to supply the necessary training. With that being said, we suggest language be added to provide for other training providers in the event that ERTC would no longer be able to provide services. That provider (s) would need to be approved by IDPH with the advice and consent of the Illinois Plumbing Code Advisory Council, and the Board of Plumbing Examiners.**

Agency Response: The legislative intent behind the creation of the ERTC is for the ERTC to be the training arm of the State programs involving water treatment and distribution. *See* 110 ILCS 530. The Agency does, however, acknowledge the expressed resource concern. Therefore, considering the limited resource of both the Illinois Department of Public Health and IEPA, the Agency would propose the following change to proposed Section 604.1510(b)(1)(B):

b) Requirements for Cross-Connection Control Device Inspector Approval

1) Each applicant for cross-connection control device inspector (CCCDI) approval must meet the following qualifications:

B) Must complete a training course offered by the Environmental Resource Training Center or the Agency's delegate on cross connection control device which includes hands on practice testing of different types of backflow devices and proper maintenance and repair.

**7(c). 604.1510(b)(1)(D) states that you "Must successfully complete both written and performance examinations demonstrating understanding of the following: the principles of backflow and back-siphonage; the hazard presented to a potable water system; locations which require installation of cross-connection control devices; identifying, locating, inspecting, testing, maintaining and repairing cross-connection control methods and devices in-line, as located throughout each system which connects to a community**

**public water supply." We would like to see "understanding" replaced with "competency", and "inspecting" removed.**

Agency Response: The Agency concurs with this recommended change and proposes the following to proposed Section 604.1510(b)(1)(D):

b) Requirements for Cross-Connection Control Device Inspector Approval

1) Each applicant for cross-connection control device inspector (CCCDI) approval must meet the following qualifications:

D) Must successfully complete both written and performance examinations demonstrating ~~understanding~~ competency of the following: the principles of backflow and back-siphonage; the hazard presented to a potable water system; locations which require installation of cross-connection control devices; identifying, locating, inspecting, testing, maintaining and repairing cross-connection control methods and devices in-line, as located throughout each system which connects to a community public water supply.

**7(d). Once a person successfully completes training to become a CCCDI, there is no requirement for further education or recertification. As methods and technologies change, the CCCDI must keep current in order to complete their work efficiently and to properly protect the water supply. Some CCCDIs do not test on a regular basis, nor do they keep current on industry changes. Cross connection programs throughout the nation require recertification at least every three years. Without a mandate for recertification, testers may very well be passing backflow preventers that should actually be failed, and thereby jeopardizing the safety of our water supplies. A section 604.1510(b)(1)(E) could be added to require all CCCDIs to recertify every three years. This could be a one day training that would demonstrate that the CCCDI still maintains the competency, both physically and knowledge wise, to perform backflow tests. We would recommend that the recertification be done by ERTC or an entity approved by IDPH with the advice and consent of the Plumbing Code Advisory Council and the Board of Plumbing Examiners. The Illinois PHCC respectfully requests your consideration of our comments.**

Agency Response: The Agency does not object to this recommendation. If the Board chooses to add this requirement the Agency believes the requirement should be integrated into proposed Section 604.1510(b)(2).

**2) AGENCY RESPONSE TO PUBLIC COMMENT TWO:**

**1. SUBPART 0: Cross Connections (604.1500 thru 604.1515), the term "backflow prevention device (s)" is used continually throughout the proposed section. We propose a technical change from backflow prevention device (s) simply to "backflow preventer" to be consistent with Illinois Plumbing Code Section 890.120 definition of "Backflow Preventer: A device or an assembly used to prevent contamination of the potable water supply through an actual or potential cross-connection." The definition of a backflow prevention device leaves out the definition of a backflow assembly. By changing the term this will encompass all testable and non-testable backflow devices and backflow assemblies.**

Agency Response: The Agency does not object to this change but defers to the Board on this matter.

**2. 604.1500 Cross Connections Subpart b, states "no cross connection shall be allowed whereby an unsafe substance may enter a community water supply", we propose adjustment language to state, "no unprotected cross connection shall be allowed whereby any non-potable source may enter a community water supply." This slight adjustment will take into consideration not just unsafe substance but also non-life threatening substances from being connected to a potable water supply.**

Agency Response: The Agency does not believe a change to proposed Section 604.1500 is necessary. In proposed Section 601.105, the definition of "Cross-connection" means any physical connection or arrangement between two otherwise separate piping systems where flow from one system to the other is possible. With the context of this definition, the Agency believes the intent of proposed Section 604.1500 is clear.

**3. 604.1505(b)(4) should be updated to reflect record keeping for testable backflow preventers. Proposed language could be "The community water supply shall maintain records of annual testing of all testable backflow preventers."**

Agency Response: To clarify the intent of proposed Section 604.1505(b)(4), the Agency proposes the following:

4) The community water supply shall maintain records of ~~annual tests~~ of all backflow prevention devices that require annual testing pursuant to 77 Ill. Adm. Code and identified in Subsections 604.1505(b)(2) and (b)(3).

**4. 604.1510 Cross Connection Control Device Inspectors:**

**ASSE believes that the proposed rule needs to change throughout the document from "Cross Connection Control Device Inspectors (CCCDI)" (including 604.1510 heading) to "Certified Cross Connection Control Tester (CCCT)" to be consistent with the definition of "Plumbing Inspector" in the Illinois Plumbing Code Section 890.120 which defines Plumbing Inspector as "employee or agent of State or local government who holds a valid Illinois Plumbing License and is authorized to inspect plumbing." Based on the definition under 890.120 a CCCDI is not an Inspector, because they do not have the ability to inspect**



**plumbing. American Backflow Prevention Association (ABPA), American Society of Sanitary Engineering (ASSE), American Water Works Association (AWWA), Backflow Prevention Manufacturers Association (BPMA), and University of Southern California's foundation for Cross Connection Control and Hydraulic Research (USC-FCCCHR), International Association of Plumbing & Mechanical Officials (IAPMO) and the International Code Council (ICC) all reference Certified Cross Connection Control Tester not Cross Connection Control Device Inspector, this will be more consistent industry and national standards. In addition, we would request that the word "inspect" be replaced with the word "test" where It appears throughout Subpart 0. Backflow preventers are being tested to ensure they are working properly. This Is not an inspection but an actual test.**

Agency Response: The Agency does not believe a change to proposed Section 604.1510 is necessary. Further, CCCDI has been used in Illinois for at least two decades and is familiar to both the plumbing and water supply professions. Proposed Section 604.1510(a) clearly delineates what the term inspection relates to in the context of this proposed Board Regulation: “Except as provided in subsection (c) cross-connection control devices must be inspected annually by a person approved by the Agency or its designee as a cross-connection control device inspector (CCCDI). *The inspection of the mechanical devices shall include physical testing in accordance with the manufacturer’s instructions* (emphasis added).”

**4(a). 604.1510(a) should have language replacement that states “At a minimum; backflow preventers shall be tested upon installation, annually and immediately after repair or when returned to service. The test shall be performed by a trained and Certified Cross Connection Control Tester. The backflow test shall include physical testing In accordance with manufacturer's Instructions and specifications.”**

Agency Response: The Agency believes that this level of specificity would be appropriate for the public health regulations found in 77 Ill. Adm. Code 890. The purpose of this provision is to provide a general reference to device testing. Nothing in this proposal is intended to lower the requirements of the public health regulations in 77 Ill. Adm. Code 890.

**4(b). 604.1510 New proposed subsection that requires all cross-connection control device annual test results be forwarded to the community water supply within 10 business days. A current survey of community water supply personnel state that they do not receive results within a timely manner which in turn put the water supply out of compliance as well as the consumer at risk.**

Agency Response: The Agency believes that this level of detail is more appropriately addressed by local government. Proposed Section 604.1505(b)(3) requires an ordinance, tariff, or required condition for service whichever is applicable which meets the Illinois Plumbing Code, 77 Ill. Adm. Code 890, shall be adopted and enforced. For the cross connection control program to be effective local entities must keep responsibility for the program and the Agency believes that this timeliness issue is best addressed at that level.

**4(c). 604.1510 New proposed subsection that requires all failed and deficient backflow preventers must be righted within 30 days. Currently there Is no requirement for a failed**

**backflow preventer to be repaired. When a backflow preventer is in a failed state it puts the whole community water supply at risk of having contaminated substance enter the potable water system.**

Agency Response: The Agency believes that this level of detail is more appropriate to 77 Ill. Adm. Code 890.

**4(d). 604.1510(a)(3) has a list of items required for the maintenance log. All items currently proposed are accurate but more required items are needed for community water supplies to comply with proposed section 604.1505. We propose the following items to be added:**

- i. Final Pass or Fail Results**
- ii. Backflow Test Kit Calibration Date, Manufacturer, Model and Serial Number**
  - 1. Backflow Test kits are required to be calibrated on an annual basis by Illinois Plumbing Code 890, and Is recommended by each manufacturer as well. Currently without this information on the maintenance log, municipal personnel do not know If the test kit Is in compliance with the manufacturers requirements.**
- iii. Licensed Plumbing Contractors Information including 055 License number that the CCCDI is employed by**
  - 1. Tills will reassure both water utilities and the general public, that the CCCDI is properly bonded, licensed and insured by IDPH.**
- iv. Type of Water Service the Device Is Servicing**
- v. Make, Model, Size, and Serial Number of backflow preventer**
  - 1. Currently this is not mandated and water utilities have incomplete data to enforce annual testing requirements.**
- vi. Location of the backflow preventer on the premises**
- vii. Backflow Preventer used for Isolation or containment purposes**

Agency Response: The Agency does not object to the addition of the items. However, this level of detail may be more appropriately addressed by local government through an ordinance, tariff, or required condition for service whichever is applicable.

**4(e). Backflow Test Kit Requirements currently are not required either in proposed section 604, or current cross connection control rules 653.801 thru 653.805. All backflow test kit manufactures require annual backflow test kit calibrations to ensure proper results when testing a backflow preventer. Adding language to that affect would result in accurately tested back flow preventers and optimal protection of our public water supply.**

Agency Response: The Agency believes that this level of detail is more appropriate for 77 Ill. Adm. Code 890.

**4(f). 604.1510(b)(1)(A) Current language reads that you must have qualifications to inspect plumbing and plumbing systems. This current language would require every CCCDI to be a Certified Plumbing Inspector according to the definition to inspect plumbing under Illinois Plumbing Code 890.120. Most currently approved CCCDIs would not meet this qualification. We propose the qualifications to be "a person authorized to perform**

**plumbing". This will allow licensed plumbers to meet those qualifications without having to be a certified plumbing inspector.**

Agency Response: The Agency concurs with this recommendation and proposes the following change to proposed Section 604.1510(b)(1)(A):

b) Requirements for Cross-Connection Control Device Inspector Approval

1) Each applicant for cross-connection control device inspector (CCCDI) approval must meet the following qualifications:

A) ~~Must meet the qualifications to inspect plumbing and plumbing systems~~ be a person authorized to perform plumbing as described in the Illinois Plumbing License Law, 225 ILCS 320/3(1).

**4(g). 604.1510(b)(1)(B) has a mandate that all training to become a CCCDI must be completed by the Environmental Resource Training Center (ERTC), ASSE believes that additional language should be added to have other training centers added that are approved by IDPH with the advice and consent of the Illinois Plumbing Advisory Council and the Board of Plumbing Examiners. Proposed language change below:**

**“Must complete a training course offered by the Environmental Resource Training Center or another agency approved course on cross connection control which includes hands on practice testing of different types of back/low preventers and proper maintenance and repair.”**

Agency Response: The legislative intent behind the creation of the ERTC is for the ERTC to be the training arm of the State programs involving water treatment and distribution. *See* 110 ILCS 530. The Agency does, however, acknowledge the expressed resource concern. Therefore, considering the limited resource of both the Illinois Department of Public Health and IEPA, the Agency would propose the following change to proposed Section 604.1510(b)(1)(B):

b) Requirements for Cross-Connection Control Device Inspector Approval

1) Each applicant for cross-connection control device inspector (CCCDI) approval must meet the following qualifications:

B) Must complete a training course offered by the Environmental Resource Training Center or the Agency's delegate on cross connection control device which includes hands on practice testing of different types of backflow devices and proper maintenance and repair.

**4(h). 604.1510(b)(1)(D) states that you must have the understanding of backflow knowledge to pass the test. In all reality, an understanding does not mean an individual is competent to pass the exam. New proposed language update is below”**

**“Must successfully complete both written and performance examinations demonstrating competency of the following: the principles of backflow and back-**

**siphonage; the hazard presented to a potable water system; locations which require installation a/ cross-connection control; identifying, locating, testing, maintaining and repairing cross-connection control methods and devices in-line, as located throughout each system which connects to a community public water supply.”**

Agency Response: The Agency concurs with this recommended change and proposes the following change to proposed Section 604.1510(b)(1)(D):

b) Requirements for Cross-Connection Control Device Inspector Approval

1) Each applicant for cross-connection control device inspector (CCCDI) approval must meet the following qualifications:

D) Must successfully complete both written and performance examinations demonstrating ~~understanding~~ competency of the following: the principles of backflow and back-siphonage; the hazard presented to a potable water system; locations which require installation of cross-connection control devices; identifying, locating, inspecting, testing, maintaining and repairing cross-connection control methods and devices in-line, as located throughout each system which connects to a community public water supply.

**4(i). 604.1510(b)(1)(D) New proposed section requiring all CCCOI to recertify for their licenses every three years. Currently, a CCCDI, after receiving approval, never has to show their ability to test in the future. The failure of IEPA and IDPH programs to ensure recertification of all CCCDIs every three years (which is a national standard) has allowed for individuals to pass backflow preventers during a failure state and putting all potable water systems at risk. Currently, the State of Illinois is the lone state within our nation that does not require a recertification course every three years to keep their CCCDI license. In our industry, water utilities and regulatory agencies have all seen falsified test reports from CCCDIs purely because of a lack of education, and training. By instilling a one day recertification every 3rd year, all CCCDI individuals would be required to pass a test that proves they still have the ability to perform such work, and in turn will insure our community water supplies are always safe. Proposed language provided below:**

**“CCCDI's are required to complete an eight hour recertification course every three years from their original issuance date of their CCCDI license. The course shall include a written and practical exam demonstrating competency in backflow prevention testing and be completed through Environmental Resources Training Center or an approved course by the agency or plumbing advisory council”**

Agency Response: The Agency does not object to this recommendation. If the Board chooses to add this requirement the Agency believes the requirement should be integrated into proposed Section 604.1510(b)(2).

**4(j). 604.1510(c), 604.1510(c)(1), 604.1510(c)(2) technical change. In language referencing "inspection" of a backflow preventer the word "Inspection" should be replaced with "tested", as there is no inspection being done under industry standard and Illinois Plumbing Code definition. A CCCDI is not inspecting a backflow preventer to make sure it is in working order they are testing the backflow preventer to make sure it's in working order.**

Agency Response: The Agency does not believe a change to proposed Section 604.1510(c) is necessary. Proposed Section 604.1510(a) clearly delineates what the term inspection relates to in the context of this proposed Board Regulation: "Except as provided in subsection (c) cross-connection control devices must be inspected annually by a person approved by the Agency or its designee as a cross-connection control device inspector (CCCDI). *The inspection of the mechanical devices shall include physical testing in accordance with the manufacturer's instructions* (emphasis added)."

**3) AGENCY RESPONSE TO PUBLIC COMMENT THREE:**

See Agency's response to public comment two above.

**4) AGENCY RESPONSE TO PUBLIC COMMENT FOUR:**

See Agency's response to public comment two above.

**5) AGENCY RESPONSE TO PUBLIC COMMENT FIVE:**

See Agency's response to public comment two above.

**6) AGENCY RESPONSE TO PUBLIC COMMENT SIX:**

See Agency's response to public comment two above.

**CERTIFICATE OF SERVICE**

Rex L. Gradeless, Assistant Counsel for the Illinois EPA, herein certifies that he has served a copy of the foregoing NOTICE OF FILING, and ILLINOIS EPA'S RESPONSE TO PUBLIC COMMENTS ONE THROUGH SIX, upon persons listed on the Service List, by placing a true copy in an envelope duly addressed bearing proper first class postage in the United States mail at Springfield, Illinois on November 1, 2017, or by sending an email from my email account (Rex.Gradeless@Illinois.gov) to the email addresses designated below with the following attached as a 15 page PDF document in an e-mail transmission on or before 5:00 pm on November 1, 2017.

By: /s/Rex L. Gradeless

THIS FILING IS SUBMITTED ELECTRONICALLY AND SERVED ON RECYCLED PAPER

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