

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

AQUA ILLINOIS, INC.,)	
)	
Petitioner,)	
)	
v.)	PCB 2023-012
)	(Permit Appeal - Public Water Supply)
ILLINOIS ENVIRONMENTAL PROTECTION)	
AGENCY,)	
)	
Respondent.)	

NOTICE OF ELECTRONIC FILING

To: *See Attached Service List*

PLEASE TAKE NOTICE that on the 21st day of October, 2022, I caused to be filed with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the attached Respondent Illinois Environmental Protection Agency's Post-Hearing Opening Brief, a true and correct copy of which is attached hereto and hereby served upon you.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

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CERTIFICATE OF SERVICE

I, Kathryn A. Pamenter, a Senior Assistant Attorney General, hereby certify that on the 21st day of October, 2022, I caused to be served the foregoing Notice of Electronic Filing and Respondent Illinois Environmental Protection Agency's Post-Hearing Opening Brief upon the parties named on the attached Service List, via e-mail or electronic filing as indicated.

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**RESPONDENT ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S
POST-HEARING OPENING BRIEF**

Respondent, the Illinois Environmental Protection Agency (“Illinois EPA”), pursuant to the Hearing Officer’s August 26, 2022 Order, submits its Post-Hearing Opening Brief to the Illinois Pollution Control Board (the “Board”).

INTRODUCTION

This Permit Appeal originated from significant lead levels existing in drinking water at homes that Petitioner Aqua Illinois, Inc.’s (“Aqua”) public water system has served, and continues to serve, within the Village of University Park (“University Park”). Specifically, sampling results showed lead levels as high as 1700 micrograms per liter in June 2019, which was more than 113 times the United States Environmental Protection Agency’s lead action level of 15 micrograms per liter ($\mu\text{g/l}$)/0.015 milligrams per liter (mg/l). Thereafter, an enforcement case was filed against Aqua due, in part, to its failure to provide assuredly safe drinking water to University Park residents. Following the filing of that case, the parties negotiated an Agreed Interim Order that set forth operating requirements for Aqua’s University Park public water supply beginning on November 1, 2019. Specific to this Permit Appeal, the Agreed Interim Order has required, and continues to require, Aqua to conduct lead compliance sampling in University Park

on a monthly basis.

In March 2022, Aqua submitted to Illinois EPA two letters seeking the elimination of the monthly compliance sampling requirement (the “Requests”). On June 29, 2022, Illinois EPA issued a Special Exception Permit, denying Aqua’s Requests, which led to Aqua’s filing of this Permit Appeal. At the September 28, 2022 hearing, Aqua offered no evidence in its case-in-chief in support of its appeal. In fact, Aqua has failed to satisfy its burden of showing that no violation of the Illinois Environmental Protection Act, 415 ILCS 5/1 *et seq.* (the “Act”), or the Board’s regulations would have occurred if Aqua’s March 2022 Requests to eliminate the monthly compliance sampling requirement had been granted. Accordingly, Illinois EPA’s June 29, 2022 denial of Aqua’s Requests must be affirmed.

BACKGROUND

Aqua owns and operates the public water system in University Park, which serves and provides drinking water to approximately 7,000 residents through approximately 1,975 connections (“UP Water System”). (Petitioner’s Petition for Review of an Illinois Environmental Protection Agency’s Special Exception Permit Decision filed on July 8, 2022 in PCB 2023-12 (“Petition”) at ¶ 2; Complaint for Injunctive Relief and Civil Penalties filed on August 16, 2019 in 19CH1208 (“Complaint”) and Answer and Affirmative Defenses to Complaint for Injunctive Relief and Civil Penalties filed on December 2, 2019 in 19CH1208 (“Answer”) at Count I, ¶¶ 5, 42.)¹ On March 27, 2013, Aqua filed a Verified Petition with the Illinois Commerce Commission (“ICC”) seeking the ICC’s permission to switch the source of the drinking water that Aqua

¹ During the September 28, 2022 hearing, the Hearing Officer took official notice/judicial notice of the Complaint and Answer. *See* Transcript of September 28, 2022 Hearing (Dkt. Entry dated Oct. 3, 2022) (“Tr.”) at p. 12, line 21 – p. 14, line 4; p. 89, line 15 – p. 90, line 3. *See also* 35 Ill. Adm. Code 101.630(a)(1); Ill. R. Evid. 201. On October 11, 2022, Respondent filed its Motion to Hearing Officer to Supplement Hearing Report to correct the inadvertent omission of Aqua’s Answer from the exhibit list in the October 6, 2022 Hearing Officer Report.

provided to University Park residents from local groundwater wells to water drawn from the Kankakee River. (Complaint and Answer at Count I, ¶ 7.) On July 30, 2014, the ICC issued its final order approving Aqua's request to switch the source of the drinking water that Aqua provided to University Park residents to the Kankakee River. (Complaint and Answer at Count I, ¶ 8; *see also* Petition at ¶ 3.)

Following such source water change, Aqua was required to utilize a corrosion control treatment in its UP Water System to “minimize[] the lead and copper concentrations at users’ taps while ensuring that the treatment does not cause the water system to violate any national primary drinking water regulations.” 35 Ill. Adm. Code 611.350(b) (definition of “optimal corrosion control treatment”); *see also* Tr. at p. 29, line 2 – p. 31, line 5.² In December 2017, Aqua began using a blended phosphate mix, comprised primarily of polyphosphate, as the corrosion control treatment in its UP Water System. (Complaint and Answer at Count I, ¶ 16; *see also* Tr. at p. 31, lines 17-24.) Thereafter, in 2019, Aqua's sampling of the drinking water in its UP Water System showed lead levels ranging from less than 1.0 µg/l to 1700 µg/l. (Complaint and Answer at Count I, ¶ 29.) As a result, Aqua exceeded the regulatory “action level” for lead of 15 µg/l for the six-month compliance sampling period of January 1 – June 30, 2019. (Petition at ¶ 3; Tr. at p. 32, line 1 – p. 34, line 14; *see also* 35 Ill. Adm. Code 611.350(b) (definitions of “action level”, “90th percentile level”, “meet”, and “exceed”); 35 Ill. Adm. Code 611.350(c)(1); 35 Ill. Adm. Code 611.350(c)(3).)

On or about June 15, 2019, Aqua started adding a new blended phosphate, comprised primarily of orthophosphate, to the drinking water that it provided to University Park residents through Aqua's UP Water System. (Complaint and Answer at Count I, ¶ 31; Tr. at p. 34, lines 15-

² The testimony regarding the educational and employment background of David Cook, Illinois EPA's witness at the September 28, 2022 hearing, is set forth at Tr. at p. 17, line 6 – p. 28, line 14.

21; *see also* R000226 (“[t]he UP system started feeding the 90/10 blended phosphate in June 2019 and continued until April 16, 2020. . . .”)³ The new blended phosphate was introduced, in part, to attempt to re-establish a protective scale on plumbing and solder, thereby preventing lead in the pipe solder or other sources from further leaching into the water supply. (Complaint and Answer at Count I, ¶ 31.) In addition, beginning on or about June 14, 2019, Aqua began testing water for lead on a weekly basis from approximately 42 separate residential locations within University Park, and then beginning in mid-July 2019, Aqua increased the number of its sampling locations in University Park to more than 70 homes. (Complaint and Answer at Count I, ¶ 32.) Sample results continued to show the presence of lead exceeding 15 µg/l, with lead levels being detected as high as 3900 µg/l. (*Id*; *see also* R000577-R000580; Tr. at p. 36, line 24 – p. 38, line 15.)

On August 16, 2019, the Complaint was filed in the Circuit Court for the Twelfth Judicial Circuit, Will County, Illinois, Chancery Division (“Circuit Court”) alleging, among other violations, that Aqua has failed to provide “continuous operation and maintenance of [Aqua’s UP Water System] so that the water shall be assuredly safe in quality. . . .” (Complaint at Count I, Section E (quoting 35 Ill. Adm. Code 601.101).) Thereafter, on November 1, 2019, the Circuit Court entered the Agreed Interim Order, (R000602-R000621), pursuant to which Aqua agreed, among other actions, to conduct monthly compliance sampling of its UP Water System “until such time as Aqua receives written approval from Illinois EPA that such additional sampling is no longer necessary. . . .”, (R000609).

Aqua exceeded the lead action level for the six-month compliance sampling periods of July 1 – December 31, 2019 and January 1 – June 30, 2020 for its UP Water System. (Tr. at p. 38,

³ During Respondent’s case-in-chief at the September 28, 2022 hearing, the Hearing Officer admitted the Record on Appeal Filed on 9.23.22, (R000001-R000621), into evidence. (Tr. at p. 35, line 17 – p. 36, line 22.)

lines 16–24; p. 40, lines 4–7.) In April 2020, Aqua changed its corrosion control treatment for its UP Water System for the third time to a phosphoric acid corrosion control chemical. (R000296-R000297; Tr. at p. 39, line 1 – p. 40, line 3.) Following such corrosion control treatment change, Aqua did not have a lead action level exceedance for the six-month compliance sampling period of July 1 – December 31, 2020. (Tr. at p. 40, lines 8-11.) However, in March 2021, Aqua’s monthly compliance sampling results showed an upward trend in lead levels, R000537 and Tr. at p. 40, lines 22-24, and Aqua had a lead action level exceedance for the six-month compliance sampling period of January 1 – June 30, 2021, Tr. at p. 41, lines 1–4. Aqua and its consultants advised Illinois EPA that, “[r]ecently observed elevated river nitrate levels from farm runoff is coinciding with lead level increases in certain homes that have not recovered. Recent river nitrate levels were extremely high making the trend more apparent.” (R000352; Tr. at p. 41, line 5 – p. 42, line 18; *see also* Tr. at p. 44, lines 6–15.)

As a result of its initial studies, in July 2021, Aqua sought and obtained Illinois EPA’s approval to change the corrosion control treatment for its UP Water System for a fourth time to zinc orthophosphate. (R000373-R000391, R000394-R000433; *see also* Tr. at p. 44, line 16 – p. 48, line 13.) In the corresponding Illinois EPA-issued construction permit (the “2021 Permit”), Additional Condition No. 6 provided:

6. Collect between 40 and 60 lead compliance samples from approved individual sample site locations each month beginning 30 days after the issuance of the operating permit for this project. Consideration should be given based upon highest past lead results and geographic representation. Consideration should also be given to sampling when CSMR and nitrate results are the highest for the month, typically following rain events. (Section 18 and 19 of the Act 415 ILCS 5/18 & 19, 35 Ill. Adm. Code 602.114, 601.101, 611.352(f) and the Chemical Change Description dated July 15, 2021)

(R000384.) After implementing the corrosion control treatment of zinc orthophosphate into its UP Water System, Aqua did not have a lead action level exceedance for the six-month compliance

sampling period of July 1 – December 31, 2021. (Tr. at p. 49, lines 13-17.)

On March 24 and 28, 2022, Aqua submitted two letters to Illinois EPA, requesting the elimination of the monthly compliance sampling requirement, defined above as the Requests. (R000001-R000013; Tr. at p. 49, line 22 – p. 50, line 22.) Specifically, Aqua sought the replacement of Additional Condition No. 6 in the 2021 Permit with the following language:

Collect between 40 and 60 lead compliance samples from the kitchen tap of compliance pool approved individual sample site locations for the month of March, 2022, as the final month of monthly compliance sampling. Thereafter, the supplier shall be required to collect no fewer than 40 lead compliance samples from compliance pool sample site locations only once in each subsequent six-month compliance sampling period and may then reduce monitoring consistent with Section 35 Ill. Adm. Code 611.356(d)(4). Aerators shall not be cleaned within 96-hours of sample collection.

(R000003 and R000009 (italics in original).) In support of its Requests, Aqua stated that (a) “[c]ircumstances have changed and the UP Water System now meets the lead action level as of the July-December, 2021 compliance monitoring period”, and (b) “on February 15, 2022, Aqua Illinois submitted its Final Optimal Corrosion Control Treatment [Recommendation] identifying zinc orthophosphate as the optimal treatment.” (R000001 and R000008.) Aqua’s letters set forth seven additional purported justifications. (R000004-R000007 and R000010-R000013.)

On June 29, 2022, Illinois EPA issued a Special Exception Permit to Aqua in response to Aqua’s March 24 and 28, 2022 letters (the “2022 Permit”). (R000014-R000016.) Pertinent to this Permit Appeal, the 2022 Permit states:

6. Additional condition #6 of construction permit 0071-FY2022 is terminated by this Special Exception Permit as it is duplicative to the lead compliance monitoring requirement in the Agreed Interim Order. The elimination of this condition does not eliminate the monthly lead compliance monitoring that is required pursuant to the Agreed Interim Order. (People of the State of Illinois, No. 19 CH 1208, November 1, 2019)

As the Agreed Interim Order requires monthly monitoring, Aqua’s request to modify additional condition #6 is denied.

(R000016; *see also* Tr. at p. 61, line 15 – p. 66, line 7.) This Permit Appeal followed on July 8, 2022. On August 22, 2022, Aqua filed a waiver of the Board’s 120-day decision deadline, extending such date from November 7, 2022 to December 15, 2022. As such, a hearing was held in this matter on September 28, 2022, during which Aqua offered no evidence in its case-in-chief in support of its Permit Appeal. (Tr. at p. 11, lines 10-23.)

ARGUMENT

I. Legal Standard for a Permit Appeal.

Section 39(a) of the Act provides that, “[w]hen the Board has by regulation required a permit for the construction, installation, or operation of any type of facility, equipment, vehicle, vessel, or aircraft, the applicant shall apply to the Agency for such permit and it shall be the duty of the Agency to issue such a permit *upon proof by the applicant that the facility, equipment, vehicle, vessel, or aircraft will not cause a violation of this Act or of regulations hereunder.*” 415 ILCS 5/39(a) (2020) (emphasis added). It is undisputed that Aqua sought a permit regarding the operation of its UP Water System, namely the elimination of the monthly compliance sampling requirement. (R000001-R000013.) “The question before the Board in permit appeal proceedings is whether the applicant proves that the application, as submitted to the Agency, demonstrated that no violation of the . . . Act . . . or rules under the Act would have occurred if the requested permit had been issued.” *Community Landfill Co. et al. v. Illinois Env'tl. Prot. Agency*, PCB 01-170, slip op. at p. 4 (Dec. 6, 2001) (citing *Panhandle Eastern Pipe Line Co. v. Illinois Env'tl. Prot. Agency*, PCB 98-102, slip op. (Jan. 21, 1999); *Joliet Sand & Gravel Co. v. Pollution Control Bd.*, 163 Ill. App. 3d 830, 833 (3d Dist. 1987) (citing *Illinois Env'tl. Prot. Agency v. Pollution Control Bd.*, 118 Ill. App. 3d 772 (1st Dist. 1983))); *Alton Packaging Corp. v. Pollution Control Bd.*, 162 Ill. App. 3d 731, 736-37 (5th Dist. 1987).

II. Because Aqua Failed to Present any Evidence at the September 28, 2022 Hearing Supporting its Petition, the Board Should Deny Aqua's Permit Appeal.

In *Browning-Ferris Industries of Illinois, Inc. v. Pollution Control Bd.*, 179 Ill. App. 3d 598 (2d Dist. 1989), the Court applied Section 39(a) of the Act and found that the petitioner had not put forth a *prima facie* case in its permit appeal:

BFI agrees with the Board that BFI had the initial burden of establishing a *prima facie* case. A close reading of its opinion reveals that the Board concluded, not that the Agency was relieved of all burden, as BFI insists, but that BFI had made neither the requisite *prima facie* showing nor established the ultimate proof of its claims and that the Agency was not obligated to carry the burden for BFI. Consequently, the Board stopped short of any discussion of what the Agency's burden might have been if BFI had successfully made its initial case.

179 Ill. App. 3d at 602 (italics in original). Following the hearing in the *Browning-Ferris* matter, the Board found that the petitioner did not present sufficient evidence in support of its appeal, which decision the appellate court upheld. *Id.* at 601, 603, 608-609.

In this Permit Appeal, Aqua failed to present any evidence whatsoever in its case-in-chief. (Tr. at p. 11, lines 10-23.) Aqua called no witnesses, entered no documents, and, with the exception of an abbreviated cross examination of Mr. Cook, whom Respondent called in its case-in-chief, presented no evidence in support of its appeal to overturn Illinois EPA's denial of Aqua's Requests to eliminate the monthly compliance sampling requirement. Because Aqua failed to present any evidence at the September 28, 2022 hearing to attempt to establish a *prima facie* case in support of its Requests, the Permit Appeal should be summarily denied.

III. Aqua Failed to Satisfy its Burden of Proving That it Submitted Sufficient Information to Illinois EPA to Demonstrate that Neither the Act, Nor the Board Regulations Would Be Violated if the March 24 and 28 Letters Were Granted.

In this Permit Appeal, Aqua has the burden to show that approval of its March 24 and 28, 2022 letters to eliminate the monthly compliance sampling requirement as of March 31, 2022, would not violate the Act or the Board's regulations. *Community Landfill*, PCB 01-170, slip op. at

p. 4; *Joliet Sand & Gravel*, 163 Ill. App. 3d at 833; *see also* 35 Ill. Adm. Code 105.112(a). Similarly, the Agreed Interim Order, as incorporated by reference into the 2022 Permit, provides in pertinent part that, “Aqua shall collect additional compliance samples on a monthly basis *until such time as Aqua receives written approval from Illinois EPA that such additional sampling is no longer necessary. . . .*” (R000609 (emphasis added).) Yet, Aqua’s asserted justifications for its Requests did not sufficiently show that monthly compliance sampling was “no longer necessary” for the UP Water System pursuant to the Act or the Board’s regulations.

First, in its March 24 and 28, 2022 letters, Aqua contended that the monthly compliance sampling requirement should be eliminated as of March 31, 2022, due to its meeting the lead action level for the July 1 – December 31, 2021 compliance sampling period. (R000001, R000004 at No. 1, R000008, R000010 at No. 1.) Yet, Aqua had already once before selected a corrosion control treatment; then had one six-month compliance sampling period below the lead action level; and then had a lead action level exceedance in the next six-month compliance sampling period in its UP Water System. (Tr. at p. 52, line 13 – p. 53, line 23; *see also* Tr. at p. 39, line 1 – p. 41, line 4.) In addition, contrary to Aqua’s allegations, Petition at ¶¶ 17-18, Aqua had not produced results for its UP Water System below the lead action level for two consecutive six-month compliance sampling periods as of June 29, 2022.⁴ (*See* Tr. at p. 73, line 24 – p. 75, line 17 (citing R000609 (citing 35 Ill. Adm. Code 611.360(a)).)

Second, Aqua argues that because it submitted its Final Optimal Corrosion Control Treatment Recommendation to Illinois EPA on February 15, 2022, the monthly compliance sampling requirement should have been eliminated as of March 31, 2022. (R000001, R000003, R000008-R000009 (citing Attachment A located at R000471-R000494).) However, “Aqua had to

⁴ Aqua is only entitled to rely upon information before the Illinois EPA as of June 29, 2022. 35 Ill. Adm. Code 105.214(a).

show that the water was assuredly safe by testing during periods when nitrate was high to see the effect on lead levels”. (Tr. at p. 55, line 10 – p. 56, line 4.) Moreover, as of June 29, 2022, Illinois EPA had not approved the fourth corrosion control treatment that Aqua submitted on February 15, 2022, for consideration for its UP Water System. 35 Ill. Adm. Code 611.351(e)(4) (setting forth the six-month review period).

Finally, Aqua’s remaining seven justifications are equally insufficient. (R00004-R00006, R000010-R000013.) Specifically, none of the asserted reasons addressed the very issue that Aqua and its consultants raised with Illinois EPA, namely nitrate’s effect on lead levels in drinking water while utilizing zinc orthophosphate as the corrosion control treatment in Aqua’s UP Water System. (Tr. at p. 41, line 5 – p. 42, line 18; p. 46, line 22 – p. 48, line 13; p. 56, line 5 – p. 61, line 14; p. 66, lines 8-23.) Similarly, after Aqua’s introduction of zinc orthophosphate into the UP Water System in July 2021, Aqua did not submit any nitrate results to Illinois EPA over 5.0 mg/l to show that zinc orthophosphate worked in the UP Water System when nitrate levels were high. (Tr. at p. 76, line 6 – p. 80, line 19.) As a result, Aqua had not demonstrated through the March 24 and 28 letters that it would comply with the “assuredly safe” requirement of 35 Ill. Adm. Code 601.101. (*Id.*; *see also* Tr. p. 55, line 24 – p. 56, line 4; p. 66, lines 8-23; p. 81, lines 5–18.)

The purpose of the monthly compliance sampling requirement has been to obtain data to determine whether Aqua’s corrosion control treatment is effective at reducing lead levels in the drinking water in Aqua’s UP Water System, so that all residents within University Park have safe drinking water, not just those within a limited compliance sampling pool. (*See* Tr. at p. 38, lines 12-15; p. 47, line 24 – p. 48, line 5; p. 66, lines 8-23.) Through the Agreed Interim Order, Aqua agreed to continue monthly compliance sampling “until such time as Aqua receives written approval from Illinois EPA that such additional sampling *is no longer necessary*. . . .” (R000609 (emphasis

added).) Aqua failed to set forth adequate bases in its March 24 and 28 letters to warrant Illinois EPA finding that “such additional sampling [was] no longer necessary” as of March 31, 2022, Aqua’s requested date, or June 29, 2022, the date of the issuance of the permit at issue in this appeal. (*Id.*; R000003; R000009; R000014-R000016.) As shown above, Aqua failed to show “that it would not violate the [A]ct or the Board regulations if the monthly sampling requirement were eliminated”. (Tr. at p. 66, line 24 – p. 68, line 3; *see also infra* at pp. 9-10.) As a result, Illinois EPA’s decision in the 2022 Permit to deny Aqua’s March 2022 Requests was proper and should be upheld.

CONCLUSION

In this Permit Appeal, Aqua had the burden to demonstrate that neither the Act, nor the Board’s regulations would be violated if Aqua’s March 24 and 28, 2022 letters were granted. *See, e.g., Alton Packaging*, 162 Ill. App. 3d at 737-738. Aqua did not submit any evidence in its case-in-chief at the September 28, 2022 hearing. In addition, based upon the foregoing, Aqua failed to satisfy its burden. Accordingly, Illinois EPA’s June 29, 2022 denial of Aqua’s Requests to eliminate the monthly compliance sampling requirement must be affirmed.

ILLINOIS ENVIRONMENTAL PROTECTION
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