

**STATE OF ILLINOIS  
DEPARTMENT OF LABOR**

|                                          |   |                                        |
|------------------------------------------|---|----------------------------------------|
| <b>IN THE MATTER OF:</b>                 | ) |                                        |
|                                          | ) |                                        |
| <b>MECHANICAL CONTRACTORS</b>            | ) |                                        |
| <b>ASSOCIATION OF CHICAGO, ILLINOIS</b>  | ) | <b>STATE FILE NO. 2027-H-CC08-2363</b> |
| <b>DAHME MECHANICAL</b>                  | ) |                                        |
| <b>INDUSTRIES, INC.</b>                  | ) | <b>DATE OF NOTICE: AUGUST 20, 2026</b> |
|                                          | ) |                                        |
| <b>OBJECTORS,</b>                        | ) |                                        |
|                                          | ) |                                        |
| <b>v.</b>                                | ) |                                        |
|                                          | ) |                                        |
| <b>JANE R. FLANAGAN, DIRECTOR of the</b> | ) |                                        |
| <b>ILLINOIS DEPARTMENT OF LABOR,</b>     | ) |                                        |
|                                          | ) |                                        |
| <b>and</b>                               | ) |                                        |
|                                          | ) |                                        |
| <b>THE ILLINOIS DEPARTMENT OF LABOR,</b> | ) |                                        |
|                                          | ) |                                        |
| <b>RESPONDENTS.</b>                      | ) |                                        |

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**PETITION OF PIPE FITTERS ASSOCIATION, LOCAL UNION 597, U.A., FOR LEAVE  
TO INTERVENE**

Proposed Intervenor, Pipe Fitters Association, Local Union 597, U.A. (“Local 597” or “the Union”), by its undersigned counsel, respectfully moves for leave to intervene in the above-captioned proceeding. In support of this motion, Local 597 states as follows:

1. This proceeding concerns written objections to prevailing wage determinations and a request for hearing under Sections 4 and 9 of the Illinois Prevailing Wage Act (“IPWA”) filed by the Objectors on August 20, 2026.
2. The Union is a labor organization affiliated with the United Association of Journeyman and Apprentices of the Plumbing and Pipe Fitting Industry of the United States and Canada which represents local members in the plumbing and pipefitting industry across the United States and Canada.

3. Local 597 is a party to, and is the exclusive bargaining representative of, bargaining unit members under the Area Agreement referenced in the objections. Its bargaining-unit apprentices and journeypersons perform work within the Pipefitter trade across the affected counties (*Exhibit A* to Written Objections and Request for Hearing).

4. The Illinois Department of Labor has noticed a Webex hearing before Administrative Law Judge Monica Silva pursuant to the IPWA, the Illinois Administrative Procedure Act, and 56 Ill. Admin. Code Part 120. The Department's Notice and August 20, 2026 Order further sets a pre-hearing conference and directs that "Any Petitions to Intervene shall be filed by August 27, 2026."

5. The Department has convened this matter under the IPWA and 56 Ill. Admin. Code Part 120, and expressly provided for the filing of petitions to intervene by the date stated above. Local 597 files this motion consistent with that Order and Part 120's governing procedures so that all interested and affected stakeholders may be heard and the record fully developed for decision.

6. 56 Ill. Admin. Code § 120.320(a)(1) provides that, upon timely written application, the Administrative Law Judge may permit a party to intervene in a hearing proceeding when:

“(A) the party is so situated that he or she may be adversely affected by a final order arising from the hearing; (B) the party requesting intervention is a necessary party to the hearing proceeding; or (C) a party's claim or defense and the main action have a question of law or fact in common.”

7. The Union's apprentices are covered by the Area Agreement, and their wage and fringe benefit treatment in the prevailing wage schedules will be directly affected by any final order arising out of this proceeding. Accordingly, Local 597 has a direct, substantial, and protectable interest in the subject matter of this case that warrants intervention under 56 Ill. Admin. Code § 120.320(a)(1)(A).

8. The objections also present a common question of law concerning whether the Department has authority under the Prevailing Wage Act, as amended by Public Act 104-0017 and Public Act

104-0434, to establish the classification and rate sought by the Objectors. The Union contends the instant proceeding is not an appropriate vehicle to seek the relief at issue. Accordingly, intervention is also warranted under 56 Ill. Admin. Code § 120.320(a)(1)(C).

9. Local 597's participation will contribute relevant evidence and perspective concerning apprentice classifications, wage structures, and training programs under the governing collective bargaining agreement, thereby assisting the Administrative Law Judge in resolving issues raised in the objections without prejudice to existing parties.

10. This motion is filed within the timeframe the Department's Order sets for petitions to intervene, and Local 597 concurrently filed an appearance consistent with 56 Ill. Admin. Code § 120.220, as directed in the Order. Granting intervention will not delay the pre-hearing conference or the noticed hearing and will aid in simplifying issues and assuring a just conclusion as contemplated by the Order.

For the foregoing reasons, Local 597 respectfully requests that the Administrative Law Judge enter an order:

- a. granting Local 597 leave to intervene as a party in this proceeding;
- b. permitting Local 597 to participate fully in the pre-hearing conference and hearing, to file pleadings, submit evidence, and examine witnesses;
- c. directing that all future notices, orders, filings, and communications be served on the undersigned counsel for Local 597; and
- d. granting such other and further relief as is just.

Respectfully submitted,

Dated: 8/27/26

/s/ Karl Masters

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