

ILLINOIS POLLUTION CONTROL BOARD
December 10th, 2020

IN RE THE MATTER OF:)
)R2118
AMENDMENTS TO 35 ILL. ADM. CODE 219)
ORGANIC MATERIAL EMISSIONS.)
)

The report of proceedings had in the hearing of the above-entitled cause before HEARING OFFICER TIMOTHY FOX, called by the Pollution Control Board, taken by PAMELA A. MARZULLO, a Notary Public in and for the County of Pinellas and State of Florida, via Zoom, 1230 Gulf Boulevard, Clearwater Beach, Florida, on the 10th day of December, 2020, at the hour of 9:00 o'clock a.m.

<p style="text-align: right;">2</p> <p>1 PRESENT: 2 VANESSA HORTON, Board Attorney 3 DANIEL PAULEY, Board attorney 4 MR. ALEX DAVIS, Illinois Environmental Regulatory Group; 5 and 6 HEPLERBROOM 7 BY: MS. MELISSA BROWN 8 4340 Acre Grove Drive 9 Springfield, Illinois, 62711 10 217-528-3674, 11 melissa.Brown@HeplerBroom.com. 12 13 on behalf of Premier Air Center; 14 15 ILLINOIS ENVIRONMENTAL PROTECTION AGENCY 16 BY: MR. CHARLES MATOESIAN and MS. DANA VETTERHOFFER 17 1021 North Grand Ave. E. 18 P.O. Box 19276 19 Springfield, Illinois 67294 20 21 on behalf of the Illinois Environmental Protection 22 Agency. 23 24 .</p> <p>15 ALSO PRESENT: 16 MS. BARBARA FLYNN CURRIE, Chair 17 MS. JENNIFER VAN WIE, Board Member 18 MR. ANAND RAO, Board Technical Unit 19 MS. CYNTHIA SANTOS, Board Member 20 CHRIS DONAGHEY, Boeing 21 ESSENCE BROWN, Board Technical Unit 22 RANGANATH Gurram, Illinois EPA Air Quality Planning Section; 23 KRISTEN MARSHALL, Boeing 24</p>	<p style="text-align: right;">4</p> <p>1 Member Cynthia Santos, who is the lead Board Member 2 assigned to this proceeding; and I see that the 3 Board Chair, Barbara Flynn Currie, has also joined 4 the call. 5 In addition, present from the Board Staff 6 are Board Attorneys Vanessa Horton and Daniel 7 Pauley, who is assisting me as the host graciously 8 for this hearing today. And also present from the 9 Board's technical staff is Anand Rao and Essence 10 Brown. 11 Secondly, I want to address technical 12 information. As you all know, of course due to 13 Covid 19, in addition to this physical location in 14 Collinsville, we have allowed Webex participation 15 through both phone and computer. 16 For those participating by Webex, either 17 on the phone or using the call me feature for sound, 18 if you would like to speak during the hearing, 19 please take your phone off of speaker phone and talk 20 directly into the phone, as that will produce a much 21 clearer sound for the court reporter and all of the 22 other participants. 23 If you wish to speak, you will also need 24 to unmute yourself. Each person entering the Webex</p>
<p style="text-align: right;">3</p> <p>1 HEARING OFFICER FOX: The time of 9:00 o'clock 2 having come, I appreciate everyone's flexibility 3 with some of the details that are required to 4 conduct a remote hearing such as this one. 5 I want to, first of all, introduce myself 6 and wish everyone a good morning and welcome them to 7 this Illinois Pollution Control Board hearing. 8 My name is Tim Fox, and I'm the Hearing 9 Officer for this rule making, which is entitled 10 "Amendments to 35 Illinois Administrative Code 219, 11 Organic Material Emission Standards for the Metro 12 East Area and 35 Illinois Administrative Code 211, 13 Definitions and General Provisions". 14 The Board docket number for this rule 15 making is R2118. Before we get to the substance of 16 these proposed rules, I want quickly to go through 17 some Board basic things. 18 First, introductions; second, technical 19 service; third, the procedure to date in this 20 docket; and then some housekeeping details, 21 including the order in which we plan to proceed 22 today. 23 First of all, introductions. Present 24 today from the Board are -- first of all, Board</p>	<p style="text-align: right;">5</p> <p>1 feed will be muted upon entry. 2 If you are participating through a 3 computer, you can unmute yourself by clicking the 4 microphone Icon. And if you are participating 5 through a phone, you will need to push star 6 on 6 your keypad to unmute yourself and be recognized. 7 For the benefit of our court reporter, and 8 of course all of the other participants, please bear 9 in mind that there may be a slight delay with Webex 10 video; and please make every effort to speak clearly 11 and void speaking at the same time as another 12 person, which will help to produce a very clear 13 transcript. 14 Finally, we are recording the Webex feed 15 of today's hearing, in order to assist the court 16 reporter. Once the Board receives the transcript of 17 the hearing, we will post it to our clerk's office 18 online for approval and then destroy the recording 19 of the Webex feed. 20 Third, I will quickly review the Board's 21 procedure today. On October 5th of 2020, IEPA filed 22 this rule-making proposal, with a motion requesting 23 that the Board expedite this review. 24 In an order on October 15th, 2020, the</p>

<p style="text-align: right;">6</p> <p>1 Board accepted the proposal and granted the motion 2 to expedite. Without commenting on the substantive 3 merits of the proposal, the Board submitted it to 4 first notice publication in the Illinois Register, 5 where it appeared on October 30th of 2020. 6 The Board published notice of the two 7 hearings to be held on this docket. On 8 October 20th, it appeared in the Springfield Journal 9 Register, the Chicago Sun Times, the LaSalle News 10 Tribune, the Rockford Journal Star, the Peoria 11 Journal Star and the Belleville News Democrat. 12 On October 21st, the notice appeared in 13 the Galena Gazette, the Champaign News-Gazette, the 14 Centralia and Mount Vernon Morning Sentinel, and the 15 Dispatch and Rock Island Argus. 16 Finally, on October 22nd, it appeared in 17 the Metropolis Planet. Today we are, of course, 18 holding the first hearing in this rule making. In 19 an order dated October 16th of 2020, the Hearing 20 Officer directed participants intending to testify 21 at this hearing to prefile that testimony by 22 November 19th. 23 On November 18th, the Board received 24 prefiled testimony on behalf of IEPA by Mr. Rory</p>	<p style="text-align: right;">8</p> <p>1 posed today by the Board, or its staff, are intended 2 solely to help develop a complete and clear record 3 for the Board's ultimate decision; and those 4 questions do not reflect any determination, or any 5 judgment on the proposal, the testimony, or any 6 questions that are based upon it. 7 Although the Hearing Officer's order that 8 intended to begin today with IEPA prefiled testimony 9 and its witness, we may have a small number of 10 persons who wish to offer a public comment on the 11 proposal; and we can make an opportunity available 12 for them to offer brief comments, so that they may 13 remain in the hearing or leave, as they wish. 14 After that, we can begin with the prefiled 15 testimony of IEPA's witness under Section 102424(f) 16 of the Board's Procedural Rules. This prefiled 17 testimony will be entered into the record as if 18 read. IEPA's witness may begin with a brief 19 introduction or summary, if he wishes to do so. 20 I would intend, then, to turn to the 21 questions for the agency's witnesses. Again, the 22 Board has filed some of those, and you can turn to 23 the agency for any responses. 24 After those, we can see whether there is</p>
<p style="text-align: right;">7</p> <p>1 Davis, who is present with us on this Webex call. 2 No other participants prefiled testimony. 3 To expedite the hearing, the Hearing 4 Officer also urged participants to prefile any 5 written questions, based on testimony by 6 December 3rd; and on that date, the Board Hearing 7 Officer Order included the Board questions on IEPA's 8 proposal. 9 I want to note that yesterday, December 10 9th, IEPA filed a motion to amend its proposal, to 11 the extent of the wording in Section 219.208(f)(1) 12 and (f)(4). 13 The Board has posted each of these 14 documents and filings to the Clerk's Office online 15 under this Docket No. R2118, filed promptly as they 16 were received. 17 Finally, and I thank you for your patience 18 for our housekeeping for this hearing. It is 19 governed by the Board's Procedural Rules; and under 20 Section 102.426 of those rules, all information that 21 is relevant, and it is not repetitious or 22 privileged, will be admitted by Hearing Officer into 23 the record. 24 Please bear in mind that any questions</p>	<p style="text-align: right;">9</p> <p>1 anyone who did not prefile testimony, but wishes to 2 testify here today. And we can also see whether 3 anyone, before we conclude, wishes to offer a public 4 comment. 5 There will also be an opportunity for any 6 participants to testify or comment on the Board's 7 request with the Department of Commerce and Economic 8 Opportunity to perform an economic impact study of 9 the proposal required by the Environmental 10 Protection Act. 11 Does anyone have any questions about our 12 order of proceeding? 13 (No response.) 14 HEARING OFFICER FOX: Not seeing any 15 indication, or hearing any indication that anyone 16 does, why don't we turn, as I suggested, to see 17 whether anyone participating in this call wishes to 18 offer a brief public comment on the agency's 19 proposal. 20 Please, at this point, unmute yourself, if 21 you would, to indicate that you do wish to offer a 22 public comment. 23 (No response.) 24 HEARING OFFICER FOX: If you believe you are</p>

<p style="text-align: right;">10</p> <p>1 speaking to us, and we're not responding, please 2 double check to make sure you have unmuted yourself. 3 If you do want to order a comment, we'll 4 just wait a second or two to make sure anyone wishes 5 to do so is able. I'm not seeing or hearing any 6 indication that anyone would like to start this 7 hearing with a public comment. 8 I think Mr. Matoesian and 9 Ms. Vetterhoffer, on behalf of the agency, that 10 we're prepared to turn to the agency witness, 11 Mr. Davis. 12 Is the agency prepared, Ms. Vetterhoffer 13 or Mr. Metroesian, to have the court reporter swear 14 Mr. Davis in? 15 MR. METOESIAN: Yes. This is Charles 16 Metroesian. I'm an attorney with the Division of 17 Legal Counsel. I'm appearing for the Agency today. 18 I have with me Mr. Rory Davis, who is the 19 Manager of the Regulatory Development Unit in the 20 Air Quality Planning Section of the Illinois EPA 21 Bureau of Air. 22 Also, as you indicated, Dana Vetterhoffer 23 is on the call. She is also an attorney. She's the 24 Deputy General Counsel of the Division of Legal</p>	<p style="text-align: right;">12</p> <p>1 very much, Mr. Davis. The one set of questions in 2 our record today were submitted on December 3rd. 3 In speaking with the agency procedure -- 4 before we begin, we can proceed through those in 5 numerical order? 6 MR. DAVIS: Yes. I did have one question, 7 whether the Board would like me to read those 8 questions in full before giving my answer. I do 9 have a full set of questions with answers. 10 HEARING OFFICER FOX: Why don't I do this, 11 Mr. Davis, since those have been available for about 12 a week, why don't I just take up the first one with 13 a brief summary of the substance of the question; 14 and we could hear the Agency's response for each of 15 those questions, if the opportunity is warranted for 16 those questions. 17 I agree that was coming through more 18 clearly. I'm going to repeat, just in case there is 19 any issues with the sound quality. What I will do, 20 Mr. Davis, is summarize each thing one by one, hear 21 the Agency's responses to the questions. 22 Mr. Davis, why don't you begin with 23 question number 1? 24 MR. DAVIS: In question No. 1, the Board asked</p>
<p style="text-align: right;">11</p> <p>1 Counsel, and you can now swear in Mr. Davis, if you 2 would like. 3 (Mr. Rory Davis was duly sworn.) 4 HEARING OFFICER FOX: Thank you very much, 5 Madam Court Reporter. Mr. Davis, thank you for your 6 appearance today and for your written testimony on 7 the 18th of November. 8 Mr. Davis, thank you for your appearance, 9 which the Board appreciates. We do, as I mentioned, 10 have your prefiled written testimony. We proceed to 11 questions right away, or if the Agency -- if 12 Mr. Davis would like to offer a brief introduction 13 or summary, that would be fine. 14 MR. DAVIS: My name is Rory Davis. I am the 15 Manager of the Regulatory Development Unit in the 16 Bureau of Air at Illinois EPA. I became the manager 17 of that unit in March, but have been an 18 Environmental Protection Engineer in the Air Quality 19 Planning Section since 2005. 20 I was responsible for assembling the 21 technical support document or TSD, and will be 22 providing all the testimony for the agency, and will 23 try to answer any questions any participants have. 24 HEARING OFFICER FOX: Very good. Thank you</p>	<p style="text-align: right;">13</p> <p>1 about the proposed definition of chemical milling 2 masking, and whether parenthetical, if needed, that 3 included different kinds of chemical milling 4 maskant. 5 The Agency believes that the definition is 6 consistent with the one with Aerospace CTG. We 7 think the parenthetical provides some clarification; 8 but if the Board finds it to be redundant, then the 9 definition would also be sufficient without the 10 parenthetical. 11 HEARING OFFICER FOX: Mr. Davis, thank you. 12 Does anyone who is participating in the call have 13 any follow-up? 14 (No response.) 15 HEARING OFFICER FOX: Mr. Davis, I'm not seeing 16 the opportunity. 17 MR. DAVIS: The second question was also a JCAR 18 question, whether in the proposed definition for 19 commercial exterior aerodynamic structure primer, 20 there should be a change, generally to a comma, and 21 the placement of "and", whether it should be "and 22 landing gear and doors" to "landing gear," comma, 23 "and doors." 24 The Agency looked into this. We believe</p>

<p style="text-align: right;">14</p> <p>1 the definition could refer to the landing gear and 2 the landing gear doors, and was intentionally 3 written, as proposed; and from the CTG, that's the 4 Agency that recommends that the proposed original 5 CTG language not be altered. 6 HEARING OFFICER FOX: Mr. Davis, thank you. 7 Does any participant have a problem with that issue? 8 (No response.) 9 HEARING OFFICER FOX: Neither seeing, nor 10 hearing anything, Mr. Davis, No. 3. 11 MR. DAVIS: Okay. Also, in public comment 1 12 from JCAR, a question in the proposed definition for 13 a commercial interior adhesive, should there be a 14 cross reference to the FAA's fire worthiness 15 requirements. 16 The Agency does not believe the cross 17 reference is necessary. The Aerospace CPG did not 18 provide a citation to the specific fire worthiness 19 requirements being contemplated. 20 Not clear why the citation is not 21 provided, but it may be to ensure that the most 22 up-to-date FAA requirements are applicable. 23 HEARING OFFICER FOX: Mr. Davis, again, thank 24 you. Is there any follow-up questions? Please</p>	<p style="text-align: right;">16</p> <p>1 the Board or JCAR is correct; but in all cases, also 2 the English units for pounds per gallon are also 3 correct, as proposed. 4 I'll go ahead and go through those. 5 HEARING OFFICER FOX: Actually, Mr. Davis, I 6 think you have made clear that for questions No. 4 7 through 9, that these simpler questions about the 8 substances, that the standard from Federal Rules 9 based on the CTG is the correct for each one of 10 those. 11 Am I understanding you correctly? 12 MR. DAVIS: Yes. So, the limits in the CTG are 13 what was intended by the Agency, and we were not 14 intending them to be slightly more stringent. 15 HEARING OFFICER FOX: Secondly, I think I 16 understood you correctly. Please set me straight, 17 if necessary. 18 Originally, the proposed equivalence, the 19 parenthetical was in pounds per gallon is correct, 20 as proposed, and are not to be adjusted to 21 correspond to the CPG. Am I correct in that? 22 MR. DAVIS: That is correct. 23 HEARING OFFICER FOX: And that would apply to 24 each of the questions No. 4 through 9 apply to</p>
<p style="text-align: right;">15</p> <p>1 unmute yourself, if you would like to raise them. . 2 (No response.) 3 HEARING OFFICER FOX: Neither seeing nor 4 hearing anything, continue. 5 MR. DAVIS: The next several questions are of 6 the same sort. So, in public comment 1, JCAR noted 7 that the VOM limit in Section 219.204R2N for 8 interior adhesives is .750 kilograms per liter, when 9 the federal limit and the CPG is .760. And then the 10 Board asked for comment on why it would be more 11 restrictive than the federal standard. 12 The limit for the answer -- the limit for 13 this category should, indeed, be 0.760 kilograms per 14 liter as the Board suggests. 15 It appears that in drafting -- in the 16 drafting process, a rounding error was accidentally 17 introduced, due to the number of significant digits 18 that would appear in the rule. 19 So, for the next few questions, the limit 20 contained in the CTG should be used; and, in all 21 cases, the parenthetical pounds-for-gallon limits 22 are correct, as proposed, because they were not 23 affected by that error. 24 So, in each case, the suggested ones from</p>	<p style="text-align: right;">17</p> <p>1 different substances; am I correct about that? 2 MR. DAVIS: That's correct. There is a 3 one-sentence quick answer, if you like. I could 4 just rattle off the answers for the record. 5 HEARING OFFICER FOX: Why don't we do that, and 6 that would give anyone who had a follow-up question 7 a chance to address those specifically. 8 Can you be clear about which question, 9 that addresses those? Mr. Davis, please go ahead. 10 MR. DAVIS: Question 5, the answer is "This 11 limit should be 0.645 kilograms per liter," and the 12 5.4 pounds per gallon equivalent is correct. 13 Question 6, "This limit should be zero 14 .880 kilograms per liter," and the 7.3 15 pounds-per-gallon equivalent is correct. 16 Question 7, "This limit should be 17 0.880 kilograms per liter," and the 18 7.3 pounds-per-gallon equivalent is correct. 19 Question 8, "This limit should be 20 0.880 kilograms per liter," and the 21 7.3 pounds-per-gallon equivalent is correct. 22 And question 9, "This limit should be 23 0.675 kilograms per liter," and the 24 5.6 pounds-per-gallon equivalent is correct.</p>

<p style="text-align: right;">18</p> <p>1 HEARING OFFICER FOX: Mr. Davis, thank you for 2 that specific clarification. 3 Is there any participant who wishes to 4 follow up on any of those questions that Mr. Davis 5 just listed? 6 MR. RAO: This is Anand Rao here. I have a 7 quick clarification question for Rory. I think it's 8 -- let me see. 9 Question 7 and also question 8, it says 10 that the VOM content limit in Section 219204R2SS 11 were scaled inhibitor is .870 KD per liter, when the 12 federal limit is 0.880 KD per liter. 13 Can you comment on whether the federal 14 limit can change, or is it set at .880 KD per liter? 15 HEARING OFFICER FOX: Mr. Davis, unmutte. 16 MR. DAVIS: Sure. The federal limit is not 17 actually a federal limit. It's more what is in the 18 Control Techniques Guidelines, just to characterize 19 that as a suggested limit from the CTG. 20 I think there's another question about 21 this later on. As far as can it change, we don't 22 often see the controls that the guidelines 23 revisited. 24 Generally, the CTG categories are set as a</p>	<p style="text-align: right;">20</p> <p>1 that there are a number of references to USEPA's 2 trading policy statement throughout Part 219. 3 In some instances, the suggested citation 4 from JCAR is given; and in others, it is not. So, 5 the Agency believes either is appropriate and will 6 defer to the Board's preference. 7 HEARING OFFICER FOX: And, Mr. Davis, if I may 8 clarify here slightly, is it the Agency's position 9 that these should be added to each of these 10 references in Part 19 in the Board's discretion? 11 MR. DAVIS: Yes, I think so. For example, 12 there's 219.205. This is K2 that is an amendment. 13 There's also an H and an I and a J2. 14 There's very similar language. In some cases, the 15 Board has included the reference and some hasn't. I 16 thinks it's about half and half. 17 So, yes, if the Board would like to 18 include the reference, then that would be fine. If 19 they did not, it would not be unusual also. 20 HEARING OFFICER FOX: Thank you for that 21 clarification, Mr. Davis. 22 Does anyone wish to offer a follow-up 23 question on No. 10? 24 (No response.)</p>
<p style="text-align: right;">19</p> <p>1 category, and then the State is responsible for, you 2 know, whatever reason, wherever you are in 3 non-containment areas classification to make rules, 4 if they are necessary; and then the requirement is 5 just to have RACT rules and the CPGs provide model 6 rules that would qualify it's RACT. 7 It is possible that they could revisit the 8 CTG and move some of these limits around, but I 9 think it's unlikely. 10 HEARING OFFICER FOX: Okay, thank you. 11 MR. RAO: Sorry for jumping the gun. 12 HEARING OFFICER FOX: Sure. On those questions 13 No. 4 through 9 that Mr. Davis just addressed, does 14 any participant have a follow-up question? 15 (No response.) 16 HEARING OFFICER FOX: Mr. Davis, I'm not seeing 17 or hearing anyone. No. 10? 18 MR. DAVIS: Okay. In question 10, it's also 19 from public comment 1 from JCAR. They questioned 20 whether the reference proposed in had 219.205(k)(2) 21 should include a citation to the Federal Register 22 regarding the USEPA's Emission Trading Policy 23 Statement. 24 When the Agency looked at this, we found</p>	<p style="text-align: right;">21</p> <p>1 HEARING OFFICER FOX: Neither seeing or hearing 2 any, No. 11 is an issue that I believe IEPA has 3 addressed in its motion to amend its proposal as 4 filed yesterday. Specifically, changing a reference 5 to subsection F6 to a reference to Section 4. 6 Does anyone wish to have a follow-up on 7 that or a motion to amend? 8 (No response.) 9 HEARING OFFICER FOX: Neither hearing or seeing 10 any, Mr. Davis, No. 12, please? 11 MR. DAVIS: Okay. In public comment 1, JCAR 12 also questions why in 219.219B, certain work 13 practice standards -- certain activities for 14 cleaning aerospace components may take place are 15 exempted from the proposed rules. 16 The sole basis for the exclusion of these 17 activities was consistency with the requirements of 18 the Aerospace CTG. USEPA developed a guideline, 19 including the cited exclusions, based on its 20 expertise in the field and input provided by 21 stakeholders. 22 The Agency recommends that the exclusions 23 be retained in the rules. 24 HEARING OFFICER FOX: Any follow-up questions?</p>

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December 10, 2020

<p style="text-align: right;">22</p> <p>1 (No response.) 2 HEARING OFFICER FOX: Mr. Davis, question 12? 3 MS. BROWN: Yes, Mr. Hearing Officer. This is 4 Melissa Brown. First and foremost, can you hear me 5 all right? 6 HEARING OFFICER FOX: Yes. 7 MS. BROWN: Okay, thank you. My question is 8 that I just want to confirm that those facilities 9 that came under proposed Section 219.208(f)(1), that 10 takes a limit of under 25 tons per year of volatile 11 organic material, those facilities that take the 12 less than 25 tons-per-year limit, before the 13 compliance date of the rule, are exempted from the 14 entire Subpart F, which includes the cleaning 15 requirements in Section 219.219, correct? 16 MR. DAVIS: Yes, I believe that is the case. 17 And while I say I believe that is the case, perhaps 18 it would be better to address that in a post-hearing 19 comment also, so we can take a second look at that 20 and make sure. Yes, I believe that is the case. 21 MS. BROWN: Okay, thank you. And then since I 22 mentioned the point of the compliance date, I just 23 want to confirm, I believe this was in an Agency's 24 filing, but it's your understanding that the</p>	<p style="text-align: right;">24</p> <p>1 The Agency is not aware of any reviews or 2 updates to the CPG and does not expect any updates 3 to the CTG in the future. 4 As I stated, it's not very common for them 5 to revisit certain parts of a CTG. I would note 6 that there is a NESHAP for aerospace manufacturing 7 and rework facilities at 40 CFR 1653, Subpart GG, 8 and that is periodically reviewed and updated. 9 I believe that is every five years by rule 10 by the USEPA, but that is for control of hazardous 11 air pollutions and not for VOM. 12 HEARING OFFICER FOX: Mr. Davis, thank you. Is 13 there any follow-up anyone wishes to ask? 14 (No response.) 15 HEARING OFFICER FOX: Neither seeing nor 16 hearing, Mr. Davis, No. 14, please? 17 MR. DAVIS: Okay. Question 14 is asking about 18 the technical support document at page 7 in 19 Section 5.11 of the document. 20 It states in the CTG and in the TSD that 21 the specially coating have relatively low use and 22 that lower VOM formulas of them are generally 23 available. Sorry, not generally available. 24 The Illinois EPA is aware of whether the</p>
<p style="text-align: right;">23</p> <p>1 compliance date for the rule will be changed from 2 January 1st and will no longer be January 3rd, 2021, 3 correct? 4 MR. DAVIS: That's right. The Agency does 5 acknowledge that compliance date would not be 6 appropriate and has said so. 7 So, we said we would examine it closer to, 8 you know, any adoption, or perhaps when the second 9 hearing is resolved and post-hearing comments. 10 So, we will have more information then. 11 But, yes, that is correct. 12 MS. BROWN: Thank you very much. That's all I 13 have. 14 HEARING OFFICER FOX: Any additional follow-up 15 questions on No. 12 for Mr. Davis? 16 (No response.) 17 HEARING OFFICER FOX: Neither seeing nor 18 hearing any, Mr. Davis, No. 13 appears to be in 19 order. 20 MR. DAVIS: Okay. Question 13 is regarding the 21 question I brought up earlier. Is IEPA aware of any 22 updates or reviews of the Aerospace EPG; and if 23 we're not aware, does it expect any updates or 24 reviews in the future?</p>	<p style="text-align: right;">25</p> <p>1 use of specially coating by potentially affected 2 sources is consistent with the CTG document, and I 3 believe that is asking about potentially affected 4 sources in Illinois; and the Agency can say that, 5 yes, the discussions with the potentially affected 6 sources during outreach appears to support that 7 characterization in the TSD. 8 I'll just repeat it. The discussions with 9 potentially-affected sources, during outreach for 10 this rule making, do support the characterization in 11 the TSD and in the CTG, specialty coatings used 12 account for a small minority of the emissions of 13 active sources. 14 HEARING OFFICER FOX: Is there anyone who 15 wishes to raise any follow-up questions? 16 (No response.) 17 HEARING OFFICER FOX: Neither seeing nor 18 hearing any, Mr. Davis, No. 15. 19 MR. DAVIS: Okay. Question 15 is also about 20 the technical support document, page 8, 21 Section 5.1.2.2 refers to comments regarding a 2015 22 review of the aerospace NESHAP, and IEPA provides a 23 copy of those comments, for the record, and does 24 this review include any review of the aerospace EPG?</p>

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December 10, 2020

<p style="text-align: right;">26</p> <p>1 If so, can Illinois EPA provide a copy for the 2 record? 3 The Agency will provide a copy of those 4 comments, the post-hearing comments if not sooner, 5 and the review did not include a review of the 6 Aerospace EPG. 7 HEARING OFFICER FOX: Thank you, Mr. Davis. 8 Any follow-up? 9 MR. RAO: This Anand Rao. I have a follow-up 10 question. 11 Mr. Davis, can you clarify, for the 12 record, if any of the potential sources are covered 13 by the NESHAP rules? 14 MR. DAVIS: Im not certain. NESHAP is 15 National Emissions Standards for Hazardous Air 16 Pollutants, N-E-S-H-A-P. 17 Im not aware that any of the sources in 18 Illinois are subject to the NESHAP. I could double 19 check that, but I believe that they are not. Again, 20 I would have to double check that, and I can follow 21 up to the Board in these comments. 22 MR. RAO: Thank you. That's all I have. 23 HEARING OFFICER FOX: Does any other 24 participant have a follow-up question?</p>	<p style="text-align: right;">28</p> <p>1 follow-up? 2 (No response.) 3 HEARING OFFICER FOX: Not seeing or hearing 4 any, No. 17, please. 5 MR. DAVIS: Okay. Question 17 is also about 6 the technical support document page 9, Section 6.0, 7 Illinois EPA states, "The coatings applied to the 8 exterior of airplanes are exempt from the 9 miscellaneous metal parts and product limits." 10 And the question is: Would we please cite 11 the specific source of this exemption? Those 12 exemptions are both found in 211, the definitions 13 for those. 14 In the definitions for miscellaneous metal 15 parts and product coatings at Section 211.3850, and 16 in the definition for miscellaneous metal parts and 17 products coating line at 211.3870. 18 HEARING OFFICER FOX: Thank you, Mr. Davis. 19 Any follow up? 20 (No response.) 21 HEARING OFFICER FOX: We are ready, Mr. Davis, 22 for No. 18. 23 MR. DAVIS: Okay. This question is about page 24 9 of the technical support document in Section 7.0.</p>
<p style="text-align: right;">27</p> <p>1 (No response.) 2 HEARING OFFICER FOX: Not seeing or hearing 3 any, Mr. Davis, we're ready to proceed. 4 MR. DAVIS: Okay. Question 16 is also from the 5 technical support document from Section 5.2 The 6 document states the "Add-on controls may not be cost 7 effective for smaller sources, and would Illinois 8 EPA comment on how it would classify sources, if 9 smaller or larger, and it considers potentially 10 affected sources to be large or small for this cost 11 effectiveness." 12 The Agency does not have a specific 13 threshold for what it would consider a small or 14 large source, with respect to this statement from 15 the TSD. 16 The CTG and the proposed coating limits in 17 it are generally considered to be cost effective 18 control measures to meet the RACT requirements. The 19 Agency and the TSD only meant that a significant 20 capital outlay for installing and operating controls 21 would be less likely for smaller sources to employ, 22 especially when compliant coatings are ready 23 commercially available. 24 HEARING OFFICER FOX: Thanks, Mr. Davis. Any</p>	<p style="text-align: right;">29</p> <p>1 The Illinois EPA refers to reviewing other state's 2 regulations in drafting its proposal. 3 "Would Illinois EPA comment on which 4 state's regulation it reviewed, and how the 5 regulations compare with this proposal?" 6 I believe we looked at a number of states 7 to see how the regulations were structured and how 8 consistent they were with the CTG requirements. 9 This is a common check that the Agency 10 generally performs to make sure we have not missed, 11 you know, maybe an update of some kind. The states 12 that we reviewed were very consistent with the CTG. 13 Specifically, I think we looked at Ohio, 14 Indiana and New Jersey, probably some others. I 15 don't remember all. But, you know, at certain 16 points you don't keep looking. 17 HEARING OFFICER FOX: Any follow-up from the 18 Agency? 19 (No response.) 20 HEARING OFFICER FOX: Mr. Davis, not seeing or 21 hearing, No. 19, the Board's final statement. 22 MR. DAVIS: Okay. Question 19 is regarding the 23 technical support document in Section 7.2, and 24 that's on page 12.</p>

<p style="text-align: right;">30</p> <p>1 The document states that it proposes the 2 CTG's RACT level control for coating application 3 processes as using one or more of nine listed 4 techniques, two of which are HVLP spraying and 5 electrostatic spray. 6 It also allows any other coating spray 7 application methods that achieve transfer efficiency 8 equivalent to HVLP or electrostatic spray 9 applications, and then asks for comments on why 10 these two techniques are the standard for an 11 alternative. 12 And, also, to comment on why the proposed 13 rules would not allow the use of alternative 14 non-spray coating application methods. 15 So, the answer would be that the HVLP and 16 the electrostatic spray application methods are the 17 ones required in the rule language at 219.219(e)(7). 18 Other methods are acceptable, if their 19 transfer efficiencies are equivalent to those two 20 methods, and if they are approved by the Agency. 21 These methods are the standard for an 22 alternative, because they are the methods that were 23 considered RACT and required by the CPG. 24 I and the Agency are not aware of coating</p>	<p style="text-align: right;">32</p> <p>1 wishes to ask any questions of the Agency's proposed 2 testimony? 3 (No response.) 4 HEARING OFFICER FOX: I'm not seeing or hearing 5 any, do we have today in this Webex feed anyone who 6 did not prefile testimony, but who wishes to offer 7 testimony today? 8 (No response.) 9 HEARING OFFICER FOX: Again, I'm not seeing or 10 hearing any indication that anyone did not prefile 11 wishes to testify today. 12 Do we have anyone who wishes to offer a 13 public comment on the Agency's proposal or on its 14 testimony here today that has not yet done so? 15 (No response.) 16 HEARING OFFICER FOX: I can take a moment to 17 make sure people are unmuting themselves who appear 18 to not be responding. 19 There's no indication that anyone on this 20 call is wishing to offer a public comment. What I 21 would like to do somewhat abruptly is take a moment, 22 as I mentioned, to address the issue of an economic 23 impact statement. 24 Section 27B of the Environmental</p>
<p style="text-align: right;">31</p> <p>1 application methods that would be considered 2 non-frail to those mentioned in the CPG and TSD. 3 Those are flow coatings, dip coating, roll coating, 4 brush coating and cotton tips swab applications. 5 Those methods would generally be 6 considered to add transfer efficiencies better than 7 the spray coating methods, and this is just because 8 spraying coatings with VOM, you atomize the 9 particles, and there are more emissions. 10 And, so, dip coating, or roll, or brush 11 coating is going to have -- generally going to have 12 better transfer efficiencies than spraying the 13 coating on. So, a non-spray alternative to those 14 may be acceptable, if it had a transfer efficiency 15 equivalent to HVLP or electrostatic spraying. 16 It's just unclear what those alternatives 17 might be. 18 HEARING OFFICER FOX: Is there a follow-up 19 question to Mr. Davis' response? 20 (No response.) 21 HEARING OFFICER FOX: Not seeing or hearing 22 any, and that brings us to the end of the Board's 23 questions. 24 Is there any other participants that</p>	<p style="text-align: right;">33</p> <p>1 Protection Act provides that the Board must request 2 that the Department of Commerce and Economic, 3 Opportunity known as DCEO, conduct an economic 4 impact study of proposed rules before the Board 5 adopts the rules. 6 The Board must make either the study or 7 the Department's explanation for not conducting one 8 available to the public at least 20 days before a 9 public hearing. 10 In a letter dated October 15th, 2020, the 11 Board's Chair, Barbara Flynn Currie, requested the 12 DCEO conduct an economic impact study of this 13 specific proposal and requested a response no later 14 than November 30th of 2020. 15 Today, the Board has not received a 16 response to that request. While I intend also to 17 address this at the second hearing, is there anyone 18 present today who would like to testify or comment 19 regarding either the Board's request for a study 20 and/or DCEO's response? 21 (No response.) 22 HEARING OFFICER FOX: Not seeing or hearing any 23 indication to that effect, Madam Court Reporter, I 24 think we've reached the point where we can go off</p>

<p style="text-align: right;">34</p> <p>1 very briefly to address procedural issues. 2 If we may go off the record just for a 3 moment. 4 (Discussion off the record.) 5 HEARING OFFICER FOX: Madam Court Reporter, you 6 may rejoin us and resume the transcript, please. 7 I do want the record to reflect that the 8 Board briefly went off the record with the 9 participants to discuss procedural issues relating 10 to deadlines, and we are now back on the record. 11 I do want to stress that copies of the 12 transcript of today's hearing are expected to be 13 available no later than December 17th of 2020, one 14 week from today, of course. 15 When the Board receives that transcript, 16 it will post it to the Clerk's Office online or COOL 17 (Phonetic) from which it could be viewed, printed 18 and downloaded immediately. 19 The second hearing in this proceeding is 20 scheduled on Thursday, January 7th, 2021, at 21 9:00 a.m., by video conference between the Board's 22 Chicago and Springfield offices, with additional 23 participation through Webex. 24 I do want to note for the participants</p>	<p style="text-align: right;">36</p> <p>1 hearing? 2 Mr. Metoesian, on behalf the Agency, are 3 you prepared to adjourn this hearing on the IEPA 4 proposal. 5 MR. METOESIAN: Yes, I am, sir. 6 HEARING OFFICER FOX: Very good. I do want, 7 Madam Court Reporter, if you would help me correct 8 an oversight. 9 I do see that we were joined on this 10 joined by Board Member Jennifer Van Wie name, 11 spelled capital V-a-n, space, W-i-e. I would like 12 the record to reflect she joined us and the 13 oversight is entirely mine. 14 Anything further before we do officially 15 adjourn? 16 (No response.) 17 HEARING OFFICER FOX: I am not seeing or 18 hearing anything at all. This hearing is adjourned, 19 and I appreciate the participation of all. 20 Mr. Davis, particularly your questions are helpful 21 for the Board. Thank you, and we will see you again 22 on January 7th in the new year. 23 (WHICH WERE ALL THE PROCEEDINGS HAD.) 24</p>
<p style="text-align: right;">35</p> <p>1 that January 7th is a day on which the Board has 2 scheduled a regular Public Board Meeting at 3 11:00 a.m. on that date. That, if necessary, we 4 will recess the hearing so that the Board could 5 conduct that meeting and resume very soon after the 6 meeting had concluded. 7 The deadline to prefile testimony for the 8 second hearing is December 30th, 2020. The Board 9 video conference hearing is on January 7th. 10 The Board rules require that any document 11 to be offered as a hearing exhibit must be received 12 by the Board's clerk at least 24 hours before the 13 Board is scheduled at the start of the hearing at 14 9:00 a.m. on January 7th. 15 If it is not filed by that deadline, the 16 exhibit may, nonetheless, be filed as a public 17 comment after the hearing adjourns. 18 At the conclusion of the second hearing, 19 the Board adjourns, we will set a deadline for any 20 post-hearing comments. We want to ensure to the 21 participants that that opportunity remains open. It 22 seems premature to set a deadline at this point. 23 Are there any other matters that we need 24 to address at this time, before we adjourn the first</p>	<p style="text-align: right;">37</p> <p>1 STATE OF ILLINOIS) 2 COUNTY OF COOK) 3 I, Pamela A. Marzullo, Court Reporter, certify that 4 I was authorized to and did stenographically report the 5 foregoing proceedings; and that the transcript is a true and 6 complete record of my stenographic notes. 7 8 I further certify that I am not a relative, 9 employee, attorney or counsel of any of the parties, nor am 10 I relative or employee of any of the parties' attorney or 11 counsel connect4d with the action, nor am I financially 12 interested in the actions. 13 14 Dated this 12th day of December, 2020 15 16 17 PAMELA A. MARZULLO Notary Public GG 156897 My Commission expires 10/31/2022 18 19 20 21 22 23 24</p>

A	aerodynamic 13:19	answers 12:9 17:4	24:1,24 26:17	Box 2:12
a.m 1:13 34:21	aerospace 13:6	appear 15:18	30:24	brief 8:12,18 9:18
35:3,14	14:17 21:14,18	32:17		11:12 12:13
able 10:5	23:22 24:6	appearance 11:6	B	briefly 34:1,8
above-entitled 1:8	25:22,24 26:6	11:8	back 34:10	brings 31:22
abruptly 32:21	agency 2:10,14	appeared 6:5,8,12	Barbara 2:16 4:3	brought 23:21
acceptable 30:18	8:23 10:9,10,12	6:16	33:11	Brown 2:6,18
31:14	10:17 11:11,22	appearing 10:17	based 7:5 8:6 16:9	4:10 22:3,4,7,21
accepted 6:1	12:3 13:5,24	appears 15:15	21:19	23:12
accidentally 15:16	14:4,16 16:13	23:18 25:6	basic 3:17	brush 31:4,10
account 25:12	19:24 20:5	applicable 14:22	basis 21:16	bsection 21:5
achieve 30:7	21:22 23:4 24:1	application 30:2,7	Beach 1:12	Bureau 10:21
acknowledge 23:5	25:4 26:3 27:12	30:14,16 31:1	bear 5:8 7:24	11:16
Acre 2:7	27:19 29:9,18	applications 30:9	behalf 2:9,13 6:24	C
Act 9:10 33:1	30:20,24 36:2	31:4	10:9 36:2	call 4:4,17 7:1
action 37:11	agency's 8:21	applied 28:7	believe 9:24 13:24	9:17 10:23
actions 37:12	9:18 12:14,21	apply 16:23,24	14:16 21:2	13:12 32:20
active 25:13	20:8 22:23 32:1	appreciate 3:2	22:16,17,20,23	called 1:9
activities 21:13,17	32:13	36:19	24:9 25:3 26:19	capital 27:20
add 31:6	agree 12:17	appreciates 11:9	29:6	36:11
Add-on 27:6	ahead 16:4 17:9	appropriate 20:5	believes 13:5 20:5	case 12:18 15:24
added 20:9	air 2:9,19 10:20	23:6	Belleville 6:11	22:16,17,20
addition 4:5,13	10:21 11:16,18	approval 5:18	benefit 5:7	cases 15:21 16:1
additional 23:14	24:11 26:15	approved 30:20	better 22:18 31:6	20:14
34:22	airplanes 28:8	Area 3:12	31:12	categories 18:24
address 4:11 17:7	ALEX 2:4	areas 19:3	Board 1:1,9 2:2,3	category 15:13
22:18 32:22	allow 30:13	Argus 6:15	2:16,17,17,18	19:1
33:17 34:1	allowed 4:14	asked 12:24 15:10	3:7,14,17,24,24	cause 1:8
35:24	allows 30:6	asking 24:17 25:3	4:1,3,5,6 5:16	Center 2:9
addressed 19:13	altered 14:5	asks 30:9	5:23 6:1,3,6,23	Centralia 6:14
21:3	alternative 30:11	assembling 11:20	7:6,7,13 8:1,22	certain 21:12,13
addresses 17:9	30:13,22 31:13	assigned 4:2	11:9 12:7,24	24:5 26:14
adhesive 14:13	alternatives 31:16	assist 5:15	13:8 15:10,14	29:15
adhesives 15:8	amend 7:10 21:3	assisting 4:7	16:1 20:15,17	certify 37:3,8
adjourn 35:24	21:7	atomize 31:8	26:21 33:1,4,6	CFR 24:7
36:3,15	amendment 20:12	attorney 2:2,3	33:15 34:8,15	Chair 2:16 4:3
adjourned 36:18	Amendments 1:3	10:16,23 37:9,10	35:1,2,4,8,10,13	33:11
adjourns 35:17,19	3:10	Attorneys 4:6	35:19 36:10,21	Champaign 6:13
adjusted 16:20	Anand 2:17 4:9	authorized 37:4	Board's 4:9 5:20	chance 17:7
ADM 1:3	18:6 26:9	available 8:11	7:19 8:3,16 9:6	change 13:20
Administrative	and/or 33:20	12:11 24:23,23	20:6,10 29:21	18:14,21
3:10,12	answer 11:23 12:8	27:23 33:8	31:22 33:11,19	changed 23:1
admitted 7:22	15:12 17:3,10	34:13	34:21 35:12	changing 21:4
adoption 23:8	30:15	Ave 2:11	Boeing 2:18,19	characterization
adopts 33:5		aware 23:21,23	Boulevard 1:12	

<p>25:7,10 characterize 18:18 Charles 2:11 10:15 check 10:2 26:19 26:20 29:9 chemical 13:1,3 Chicago 6:9 34:22 CHRIS 2:18 citation 14:18,20 19:21 20:3 cite 28:10 cited 21:19 clarification 13:7 18:2,7 20:21 clarify 20:8 26:11 classification 19:3 classify 27:8 cleaning 21:14 22:14 clear 5:12 8:2 14:20 16:6 17:8 clearer 4:21 clearly 5:10 12:18 Clearwater 1:12 clerk 35:12 clerk's 5:17 7:14 34:16 clicking 5:3 closer 23:7 coating 24:21 25:1 27:16 28:17 30:2,6,14 30:24 31:3,3,4,7 31:10,11,13 coatings 25:11 27:22 28:7,15 31:3,8 Code 1:3 3:10,12 Collinsville 4:14 come 3:2 coming 12:17 comma 13:20,22 comment 8:10 9:4</p>	<p>9:6,18,22 10:3,7 14:11 15:6,10 18:13 19:19 21:11 22:19 27:8 29:3 30:12 32:13,20 33:18 35:17 commenting 6:2 comments 8:12 23:9 25:21,23 26:4,4,21 30:9 35:20 Commerce 9:7 33:2 commercial 13:19 14:13 commercially 27:23 Commission 37:18 common 24:4 29:9 compare 29:5 complete 8:2 37:6 compliance 22:13 22:22 23:1,5 compliant 27:22 components 21:14 computer 4:15 5:3 conclude 9:3 concluded 35:6 conclusion 35:18 conduct 3:4 33:3 33:12 35:5 conducting 33:7 conference 34:21 35:9 confirm 22:8,23 connect4d 37:11 consider 27:13 considered 27:17 30:23 31:1,6 considers 27:9 consistency 21:17 consistent 13:6</p>	<p>25:2 29:8,12 contained 15:20 contemplated 14:19 content 18:10 continue 15:4 control 1:1,9 3:7 18:18 24:10 27:18 30:2 controls 18:22 27:6,20 COOK 37:2 COOL 34:16 copies 34:11 copy 25:23 26:1,3 correct 15:22 16:1 16:3,9,19,21,22 17:1,2,12,15,18 17:21,24 22:15 23:3,11 36:7 correctly 16:11,16 correspond 16:21 cost 27:6,10,17 cotton 31:4 counsel 10:17,24 11:1 37:9,11 County 1:10 37:2 course 4:12 5:8 6:17 34:14 court 4:21 5:7,15 10:13 11:5 33:23 34:5 36:7 37:3 covered 26:12 Covid 4:13 CPG 14:17 15:9 16:21 24:2 30:23 31:2 CPGs 19:5 cross 14:14,16 CTG 13:6 14:3,5 15:20 16:9,12 18:19,24 19:8 21:18 24:3,5,20 25:2,11 27:16</p>	<p>29:8,12 CTG's 30:2 Currie 2:16 4:3 33:11 Cynthia 2:17 4:1</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>Dana 2:11 10:22 Daniel 2:3 4:6 date 3:19 7:6 22:13,22 23:1,5 35:3 dated 6:19 33:10 37:14 Davis 2:4 7:1 10:11,14,18 11:1 11:3,5,8,12,14 11:14 12:1,6,11 12:20,22,24 13:11,15,17 14:6 14:10,11,23 15:5 16:5,12,22 17:2 17:9,10 18:1,4 18:15,16 19:13 19:16,18 20:7,11 20:21 21:10,11 22:2,16 23:4,15 23:18,20 24:12 24:16,17 25:18 25:19 26:7,11,14 27:3,4,24 28:5 28:18,21,23 29:20,22 36:20 Davis' 31:19 day 1:12 35:1 37:14 days 33:8 DCEO 33:3,12 DCEO's 33:20 deadline 35:7,15 35:19,22 deadlines 34:10 December 1:1,13 7:6,9 12:2 34:13 35:8 37:14</p>	<p>decision 8:3 defer 20:6 definition 13:1,5 13:9,18 14:1,12 28:16 definitions 3:13 28:12,14 delay 5:9 Democrat 6:11 Department 9:7 33:2 Department's 33:7 Deputy 10:24 destroy 5:18 details 3:3,20 determination 8:4 develop 8:2 developed 21:18 Development 10:19 11:15 different 13:3 17:1 digits 15:17 dip 31:3,10 directed 6:20 directly 4:20 discretion 20:10 discuss 34:9 Discussion 34:4 discussions 25:5,8 Dispatch 6:15 Division 10:16,24 docket 3:14,20 6:7 7:15 document 11:21 24:18,19 25:2,20 27:5,6 28:6,24 29:23 30:1 35:10 documents 7:14 DONAGHEY 2:18 doors 13:22,23 14:2</p>
--	---	---	--	---

26:20 downloaded 34:18 drafting 15:15,16 29:2 Drive 2:7 due 4:12 15:17 duly 11:3	Environmental 2:4,10,13 9:9 11:18 32:24 EPA 2:19 10:20 11:16 24:24 26:1 27:8 28:7 29:1,3 EPG 23:22 25:24 26:6 equivalence 16:18 equivalent 17:12 17:15,18,21,24 30:8,19 31:15 error 15:16,23 especially 27:22 Essence 2:18 4:9 everyone's 3:2 examine 23:7 example 20:11 exclusion 21:16 exclusions 21:19 21:22 exempt 28:8 exempted 21:15 22:13 exemption 28:11 exemptions 28:12 exhibit 35:11,16 expect 23:23 24:2 expected 34:12 expedite 5:23 6:2 7:3 expertise 21:20 expires 37:18 explanation 33:7 extent 7:11 exterior 13:19 28:8	24:7 far 18:21 feature 4:17 federal 15:9,11 16:8 18:12,13,16 18:17 19:21 feed 5:1,14,19 32:5 field 21:20 filed 5:21 7:10,15 8:22 21:4 35:15 35:16 filing 22:24 filings 7:14 final 29:21 Finally 5:14 6:16 7:17 financially 37:11 finds 13:8 fine 11:13 20:18 fire 14:14,18 first 3:5,18,23,24 6:4,18 12:12 22:4 35:24 five 24:9 flexibility 3:2 Florida 1:11,12 flow 31:3 Flynn 2:16 4:3 33:11 follow 18:4 26:20 28:19 follow-up 13:13 14:24 17:6 19:14 20:22 21:6,24 23:14 24:13 25:15 26:8,9,24 28:1 29:17 31:18 foregoing 37:5 foremost 22:4 formulas 24:22 found 19:24 28:12 Fox 1:9 3:1,8 9:14 9:24 11:4,24	12:10 13:11,15 14:6,9,23 15:3 16:5,15,23 17:5 18:1,15 19:10,12 19:16 20:7,20 21:1,9,24 22:2,6 23:14,17 24:12 24:15 25:14,17 26:7,23 27:2,24 28:3,18,21 29:17 29:20 31:18,21 32:4,9,16 33:22 34:5 36:6,17 full 12:8,9 further 36:14 37:8 future 23:24 24:3	Grove 2:7 guideline 21:18 guidelines 18:18 18:22 Gulf 1:11 gun 19:11 Gurram 2:19
<hr/> E <hr/>				<hr/> H <hr/>
E 2:11 earlier 23:21 East 3:12 economic 9:7,8 32:22 33:2,3,12 effect 33:23 effective 27:7,17 effectiveness 27:11 efficiencies 30:19 31:6,12 efficiency 30:7 31:14 effort 5:10 either 4:16 20:5 33:6,19 electrostatic 30:5 30:8,16 31:15 Emission 3:11 19:22 emissions 1:4 25:12 26:15 31:9 employ 27:21 employee 37:9,10 Engineer 11:18 English 16:2 ensure 14:21 35:20 entered 8:17 entering 4:24 entire 22:14 entirely 36:13 entitled 3:9 entry 5:1				H 20:13 half 20:16,16 hazardous 24:10 26:15 hear 12:14,20 22:4 hearing 1:7,8 3:1 3:4,7,8 4:8,18 5:15,17 6:18,19 6:21 7:3,3,6,18 7:22 8:7,13 9:14 9:15,24 10:5,7 11:4,24 12:10 13:11,15 14:6,9 14:10,23 15:3,4 16:5,15,23 17:5 18:1,15 19:10,12 19:16,17 20:7,20 21:1,1,9,9,24 22:2,3,6 23:9,14 23:17,18 24:12 24:15,16 25:14 25:17,18 26:7,23 27:2,2,24 28:3,3 28:18,21 29:17 29:20,21 31:18 31:21,21 32:4,4 32:9,10,16 33:9 33:17,22,22 34:5 34:12,19 35:4,8 35:9,11,13,17,18 36:1,3,6,17,18 36:18 hearings 6:7 held 6:7 help 5:12 8:2 36:7

helpful 36:20 HEPLERBRO... 2:6 holding 6:18 Horton 2:2 4:6 host 4:7 hour 1:13 hours 35:12 housekeeping 3:20 7:18 HVLP 30:4,8,15 31:15	10:6 32:10,19 33:23 information 4:12 7:20 23:10 inhibitor 18:11 input 21:20 installing 27:20 instances 20:3 intend 8:20 33:16 intended 8:1,8 16:13 intending 6:20 16:14 intentionally 14:2 interested 37:12 interior 14:13 15:8 introduce 3:5 introduced 15:17 introduction 8:19 11:12 introductions 3:18,23 Island 6:15 issue 14:7 21:2 32:22 issues 12:19 34:1 34:9	jumping 19:11	looked 13:24 19:24 29:6,13 looking 29:16 low 24:21 lower 24:22	Metoesian 10:13 10:15,16 36:2,5 Metro 3:11 Metropolis 6:17 microphone 5:4 milling 13:1,3 mind 5:9 7:24 mine 36:13 minority 25:12 miscellaneous 28:9,14,16 missed 29:10 model 19:5 moment 32:16,21 34:3 morning 3:6 6:14 motion 5:22 6:1 7:10 21:3,7 Mount 6:14 move 19:8 muted 5:1
<hr/> I <hr/> Icon 5:4 IEPA 5:21 6:24 7:10 8:8 21:2 23:21 25:22 36:3 IEPA's 7:7 8:15 8:18 ILL 1:3 Illinois 1:1 2:4,7 2:10,12,13,19 3:7,10,12 6:4 10:20 11:16 24:24 25:4 26:1 26:18 27:7 28:7 29:1,3 37:1 immediately 34:18 impact 9:8 32:23 33:4,12 include 19:21 20:18 25:24 26:5 included 7:7 13:3 20:15 includes 22:14 including 3:21 21:19 Indiana 29:14 indicate 9:21 indicated 10:22 indication 9:15,15	<hr/> J <hr/> J2 20:13 January 23:2,2 34:20 35:1,9,14 36:22 JCAR 13:17 14:12 15:6 16:1 19:19 20:4 21:11 Jennifer 2:16 36:10 Jersey 29:14 joined 4:3 36:9,10 36:12 Journal 6:8,10,11 judgment 8:5	<hr/> K <hr/> K2 20:12 KD 18:11,12,14 keep 29:16 keypad 5:6 kilograms 15:8,13 17:11,14,17,20 17:23 kind 29:11 kinds 13:3 know 4:12 19:2 23:8 29:11,15 known 33:3 KRISTEN 2:19	<hr/> M <hr/> Madam 11:5 33:23 34:5 36:7 making 3:9,15 6:18 25:10 manager 10:19 11:15,16 manufacturing 24:6 March 11:17 MARSHALL 2:19 Marzullo 1:10 37:3,16 maskant 13:4 masking 13:2 material 1:4 3:11 22:11 Matoesian 2:11 10:8 MATTER 1:2 matters 35:23 meant 27:19 measures 27:18 meet 27:18 meeting 35:2,5,6 Melissa 2:6 22:4 melissa.Brown... 2:8 Member 2:16,17 4:1,1 36:10 mentioned 11:9 22:22 31:2 32:22 merits 6:3 metal 28:9,14,16 methods 30:7,14 30:16,18,20,21 30:22 31:1,5,7	<hr/> N <hr/> N-E-S-H-A-P 26:16 name 3:8 11:14 36:10 National 26:15 necessary 14:17 16:17 19:4 35:3 need 4:23 5:5 35:23 needed 13:2 Neither 14:9 15:3 21:1,9 23:17 24:15 25:17 NESHAP 24:6 25:22 26:13,14 26:18 new 29:14 36:22 News 6:9,11 News-Gazette 6:13 nine 30:3 non-containment

19:3 non-frail 31:2 non-spray 30:14 31:13 North 2:11 Notary 1:10 37:17 note 7:9 24:5 34:24 noted 15:6 notes 37:6 notice 6:4,6,12 November 6:22 6:23 11:7 33:14 number 3:14 8:9 12:23 15:17 20:1 29:6 numerical 12:5	34:5 36:6,17 Officer's 8:7 offices 34:22 officially 36:14 Ohio 29:13 Okay 14:11 19:10 19:18 21:11 22:7,21 23:20 24:17 25:19 27:4 28:5,23 29:22 Once 5:16 one-sentence 17:3 ones 15:24 30:17 online 5:18 7:14 34:16 open 35:21 operating 27:20 opportunity 8:11 9:5,8 12:15 13:16 33:3 35:21 order 3:21 5:15 5:24 6:19 7:7 8:7 9:12 10:3 12:5 23:19 organic 1:4 3:11 22:11 original 14:4 Originally 16:18 outlay 27:20 outreach 25:6,9 oversight 36:8,13	18:3 19:14 26:24 participants 4:22 5:8 6:20 7:2,4 9:6 11:23 31:24 34:9,24 35:21 participating 4:16 5:2,4 9:17 13:12 participation 4:14 34:23 36:19 particles 31:9 particularly 36:20 parties 37:9 parties' 37:10 parts 24:5 28:9,15 28:16 patience 7:17 Pauley 2:3 4:7 people 32:17 Peoria 6:10 perform 9:8 performs 29:10 periodically 24:8 person 4:24 5:12 persons 8:10 phone 4:15,17,19 4:19,20 5:5 Phonetic 34:17 physical 4:13 Pinellas 1:11 place 21:14 placement 13:21 plan 3:21 Planet 6:17 Planning 2:19 10:20 11:19 please 4:19 5:8,10 7:24 9:20 10:1 14:24 16:16 17:9 21:10 24:16 28:4,10 34:6 point 9:20 22:22 33:24 35:22 points 29:16	policy 19:22 20:2 Pollutants 26:16 Pollution 1:1,9 3:7 pollutions 24:11 posed 8:1 position 20:8 possible 19:7 post 5:17 34:16 post-hearing 22:18 23:9 26:4 35:20 posted 7:13 potential 26:12 potentially 25:1,3 25:5 27:9 potentially-affe... 25:9 pounds 16:2,19 17:12 pounds-for-gall... 15:21 pounds-per-gall... 17:15,18,21,24 practice 21:13 preference 20:6 prefile 6:21 7:4 9:1 32:6,10 35:7 prefiled 6:24 7:2 8:8,14,16 11:10 premature 35:22 Premier 2:9 prepared 10:10 10:12 36:3 present 2:1,15 3:23 4:5,8 7:1 33:18 primer 13:19 printed 34:17 privileged 7:22 probably 29:14 problem 14:7 procedural 7:19 8:16 34:1,9 procedure 3:19	5:21 12:3 proceed 3:21 11:10 12:4 27:3 proceeding 4:2 9:12 34:19 proceedings 1:7 36:23 37:5 process 15:16 processes 30:3 produce 4:20 5:12 product 28:9,15 products 28:17 promptly 7:15 proposal 5:22 6:1 6:3 7:8,10 8:5 8:11 9:9,19 21:3 29:2,5 32:13 33:13 36:4 proposed 3:16 13:1,18 14:3,4 14:12 15:22 16:3,18,20 19:20 21:15 22:9 27:16 30:12 32:1 33:4 proposes 30:1 Protection 2:10 2:13 9:10 11:18 33:1 provide 14:18 19:5 26:1,3 provided 14:21 21:20 provides 13:7 25:22 33:1 providing 11:22 Provisions 3:13 public 1:10 8:10 9:3,18,22 10:7 14:11 15:6 19:19 21:11 32:13,20 33:8,9 35:2,16 37:17 publication 6:4 published 6:6
<hr/> O <hr/>				
o'clock 1:13 3:1 October 5:21,24 6:5,8,12,16,19 33:10 offer 8:10,12 9:3 9:18,21 11:12 20:22 32:6,12,20 offered 35:11 office 5:17 7:14 34:16 Officer 1:8 3:1,9 6:20 7:4,7,22 9:14,24 11:4,24 12:10 13:11,15 14:6,9,23 15:3 16:5,15,23 17:5 18:1,15 19:10,12 19:16 20:7,20 21:1,9,24 22:2,3 22:6 23:14,17 24:12,15 25:14 25:17 26:7,23 27:2,24 28:3,18 28:21 29:17,20 31:18,21 32:4,9 32:16 33:22	<hr/> P <hr/>			
	P.O 2:12 page 24:18 25:20 28:6,23 29:24 Pamela 1:9 37:3 37:16 parenthetical 13:2,7,10 15:21 16:19 Part 20:2,10 participant 14:7			

push 5:5	28:21	repeat 12:18 25:8	29:4,12	32:24
<hr/> Q <hr/>	reason 19:2	repetitious 7:21	reviewing 29:1	see 4:2 8:24 9:2,16
qualify 19:6	received 6:23 7:16	report 1:7 37:4	reviews 23:22,24	18:8,22 29:7
quality 2:19 10:20	33:15 35:11	reporter 4:21 5:7	24:1	36:9,21
11:18 12:19	receives 5:16	5:16 10:13 11:5	revisit 19:7 24:5	seeing 9:14 10:5
question 12:6,13	34:15	33:23 34:5 36:7	revisited 18:23	13:15 14:9 15:3
12:23,24 13:17	recess 35:4	37:3	rework 24:7	19:16 21:1,9
13:18 14:12	recognized 5:6	request 9:7 33:1	right 11:11 22:5	23:17 24:15
17:6,8,10,13,16	recommends 14:4	33:16,19	23:4	25:17 27:2 28:3
17:19,22 18:7,9	21:22	requested 33:11	Rock 6:15	29:20 31:21
18:9,20 19:14,18	record 7:23 8:2,17	33:13	Rockford 6:10	32:4,9 33:22
20:23 22:2,7	12:2 17:4 25:23	requesting 5:22	roll 31:3,10	36:17
23:20,21 24:17	26:2,12 34:2,4,7	require 35:10	Rory 6:24 10:18	Sentinel 6:14
25:19 26:10,24	34:8,10 36:12	required 3:3 9:9	11:3,14 18:7	service 3:19
27:4 28:5,10,23	37:6	30:17,23	rounding 15:16	set 12:1,9 16:16
29:22 31:19	recording 5:14,18	requirement 19:4	rule 3:9,14 6:18	18:14,24 35:19
questioned 19:19	redundant 13:8	requirements	15:18 22:13	35:22
questions 7:5,7,24	refer 14:1	14:15,19,22	23:1 24:9 25:10	significant 15:17
8:4,6,21 9:11	reference 14:14	21:17 22:15	30:17	27:19
11:11,23 12:1,8	14:17 19:20	27:18 29:8	rule-making 5:22	similar 20:14
12:9,15,16,21	20:15,18 21:4,5	resolved 23:9	rules 3:16 7:19,20	simpler 16:7
14:24 15:5,19	references 20:1,10	respect 27:14	8:16 16:8 19:3,5	sir 36:5
16:6,7,24 18:4	refers 25:21 29:1	responding 10:1	19:6 21:15,23	slight 5:9
19:12 21:12,24	reflect 8:4 34:7	32:18	26:13 30:13	slightly 16:14 20:8
23:15 25:15	36:12	response 9:13,23	33:4,5 35:10	small 8:9 25:12
31:23 32:1	regarding 19:22	12:14 13:14	<hr/> S <hr/>	27:10,13
36:20	23:20 25:21	14:8 15:2 19:15	Santos 2:17 4:1	smaller 27:7,9,21
quick 17:3 18:7	29:22 33:19	20:24 21:8 22:1	says 18:9	sole 21:16
quickly 3:16 5:20	Register 6:4,9	23:16 24:14	scaled 18:11	solely 8:2
<hr/> R <hr/>	19:21	25:16 27:1 28:2	scheduled 34:20	somewhat 32:21
R2118 1:3 3:15	regular 35:2	28:20 29:19	35:2,13	soon 35:5
7:15	regulation 29:4	31:19,20 32:3,8	second 3:18 10:4	sooner 26:4
RACT 19:5,6	regulations 29:2,5	32:15 33:13,16	13:17 22:19	Sorry 19:11 24:23
27:18 30:2,23	29:7	33:20,21 36:16	23:8 33:17	sort 15:6
raise 15:1 25:15	Regulatory 2:4	responses 8:23	34:19 35:8,18	sound 4:17,21
RANGANATH	10:19 11:15	12:21	Secondly 4:11	12:19
2:19	rejoin 34:6	responsible 11:20	16:15	source 27:14
Rao 2:17 4:9 18:6	relating 34:9	19:1	Section 2:19 7:11	28:11
18:6 19:11 26:9	relative 37:8,10	restrictive 15:11	7:20 8:15 10:20	sources 25:2,4,6,9
26:9,22	relatively 24:21	resume 34:6 35:5	11:19 15:7	25:13 26:12,17
rattle 17:4	relevant 7:21	retained 21:23	18:10 21:5 22:9	27:7,8,10,21
reached 33:24	remain 8:13	review 5:20,23	22:15 24:19	space 36:11
read 8:18 12:7	remains 35:21	25:22,24,24 26:5	25:21 27:5 28:6	speak 4:18,23
ready 27:3,22	remember 29:15	26:5	28:15,24 29:23	5:10
	remote 3:4	reviewed 24:8		speaker 4:19

<p>speaking 5:11 10:1 12:3 specialty 24:21 25:1 specialty 25:11 specific 14:18 18:2 27:12 28:11 33:13 specifically 17:7 21:4 29:13 spelled 36:11 spray 30:5,6,8,16 31:7 spraying 30:4 31:8,12,15 Springfield 2:7,12 6:8 34:22 staff 4:5,9 8:1 stakeholders 21:21 standard 15:11 16:8 30:10,21 standards 3:11 21:13 26:15 star 5:5 6:10,11 start 10:6 35:13 State 1:11 19:1 37:1 state's 29:1,4 stated 24:4 statement 19:23 20:2 27:14 29:21 32:23 states 24:20 27:6 28:7 29:6,11 30:1 stenographic 37:6 stenographically 37:4 straight 16:16 stress 34:11 stringent 16:14 structure 13:19 structured 29:7 study 9:8 33:4,6</p>	<p>33:12,19 su 21:5 subject 26:18 submitted 6:3 12:2 Subpart 22:14 24:7 substance 3:15 12:13 substances 16:8 17:1 substantive 6:2 sufficient 13:9 suggested 9:16 15:24 18:19 20:3 suggests 15:14 summarize 12:20 summary 8:19 11:13 12:13 Sun 6:9 support 11:21 24:18 25:6,10,20 27:5 28:6,24 29:23 sure 10:2,4 18:16 19:12 22:20 29:10 32:17 swab 31:4 swear 10:13 11:1 sworn 11:3</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>take 4:19 12:12 21:14 22:11,19 32:16,21 taken 1:9 takes 22:10 talk 4:19 technical 2:17,18 3:18 4:9,11 11:21 24:18 25:20 27:5 28:6 28:24 29:23 techniques 18:18</p>	<p>30:4,10 testify 6:20 9:2,6 32:11 33:18 testimony 6:21,24 7:2,5 8:5,8,15 8:17 9:1 11:6,10 11:22 32:2,6,7 32:14 35:7 thank 7:17 11:4,5 11:8,24 13:11 14:6,23 18:1 19:10 20:20 22:7,21 23:12 24:12 26:7,22 28:18 36:21 Thanks 27:24 thing 12:20 things 3:17 think 10:8 13:7 16:6,15 18:7,20 19:9 20:11 29:13 33:24 thinks 20:16 third 3:19 5:20 threshold 27:13 Thursday 34:20 Tim 3:8 time 3:1 5:11 35:24 Times 6:9 TIMOTHY 1:8 tips 31:4 today 3:22,24 4:8 5:21 6:17 8:1,8 9:2 10:17 11:6 12:2 32:5,7,11 32:14 33:15,18 34:14 today's 5:15 34:12 tons 22:10 tons-per-year 22:12 trading 19:22 20:2 transcript 5:13,16</p>	<p>34:6,12,15 37:5 transfer 30:7,19 31:6,12,14 Tribune 6:10 true 37:5 try 11:23 TSD 11:21 24:20 25:7,11 27:15,19 31:2 turn 8:20,22 9:16 10:10 two 6:6 10:4 30:4 30:10,19</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>ultimate 8:3 unclear 31:16 understanding 16:11 22:24 understood 16:16 unit 2:17,18 10:19 11:15,17 units 16:2 unmute 4:24 5:3,6 9:20 15:1 18:15 unmuted 10:2 unmuting 32:17 unusual 20:19 up-to-date 14:22 update 29:11 updated 24:8 updates 23:22,23 24:2,2 urged 7:4 use 24:21 25:1 30:13 USEPA 21:18 24:10 USEPA's 19:22 20:1</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>V-a-n 36:11 Van 2:16 36:10 Vanessa 2:2 4:6 Vernon 6:14</p>	<p>Vetterhoffer 2:11 10:9,12,22 video 5:10 34:21 35:9 viewed 34:17 void 5:11 volatile 22:10 VOM 15:7 18:10 24:11,22 31:8</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>W-i-e 36:11 wait 10:4 want 3:5,16 4:11 7:9 10:3 22:8,23 34:7,11,24 35:20 36:6 warranted 12:15 we'll 10:3 we're 10:1,10 23:23 27:3 we've 33:24 Webex 4:14,16,24 5:9,14,19 7:1 32:5 34:23 week 12:12 34:14 welcome 3:6 went 34:8 Wie 2:16 36:10 wish 3:6 4:23 8:10 8:13 9:21 20:22 21:6 wishes 8:19 9:1,3 9:17 10:4 18:3 24:13 25:15 32:1,6,11,12 wishing 32:20 witness 8:9,15,18 10:10 witnesses 8:21 wording 7:11 work 21:12 worthiness 14:14 14:18 written 7:5 11:6</p>
--	---	---	--	---

11:10 14:3	18 28:22	3rd 7:6 12:2 23:2	
<hr/> X <hr/>	18th 6:23 11:7	<hr/> 4 <hr/>	
<hr/> Y <hr/>	19 4:13 20:10	4 7:12 16:6,24	
year 22:10 36:22	29:21,22	19:13 21:5	
years 24:9	19276 2:12	40 24:7	
yesterday 7:9 21:4	19th 6:22	4340 2:7	
<hr/> Z <hr/>	1st 23:2	<hr/> 5 <hr/>	
zero 17:13	<hr/> 2 <hr/>	5 17:10	
Zoom 1:11	20 33:8	5.1.2.2 25:21	
<hr/> 0 <hr/>	2005 11:19	5.11 24:19	
0.645 17:11	2015 25:21	5.2 27:5	
0.675 17:23	2020 1:1,13 5:21	5.4 17:12	
0.760 15:13	5:24 6:5,19	5.6 17:24	
0.880 17:17,20	33:10,14 34:13	5th 5:21	
18:12	35:8 37:14	<hr/> 6 <hr/>	
<hr/> 1 <hr/>	2021 23:2 34:20	6 5:5 17:13	
1 12:23,24 14:11	20th 6:8	6.0 28:6	
15:6 19:19	211 3:12 28:12	62711 2:7	
21:11	211.3850 28:15	67294 2:12	
10 19:17,18 20:23	211.3870 28:17	<hr/> 7 <hr/>	
10/31/2022 37:18	217-528-3674 2:8	7 17:16 18:9 24:18	
102.426 7:20	219 1:3 3:10 20:2	7.0 28:24	
1021 2:11	219.204R2N 15:7	7.2 29:23	
102424(f) 8:15	219.205 20:12	7.3 17:14,18,21	
10th 1:1,12	219.205(k)(2)	750 15:8	
11 21:2	19:20	760 15:9	
11:00 35:3	219.208(f)(1) 7:11	7th 34:20 35:1,9	
12 21:10 22:2	22:9	35:14 36:22	
23:15 29:24	219.219 22:15	<hr/> 8 <hr/>	
1230 1:11	219.219(e)(7)	8 17:19 18:9 25:20	
12th 37:14	30:17	870 18:11	
13 23:18,20	219.219B 21:12	880 17:14 18:14	
14 24:16,17	219204R2SS	<hr/> 9 <hr/>	
15 25:18,19	18:10	9 16:7,24 17:22	
156897 37:17	21st 6:12	19:13 28:6,24	
15th 5:24 33:10	22nd 6:16	9:00 1:13 3:1	
16 27:4	24 35:12	34:21 35:14	
1653 24:7	25 22:10,12	9th 7:10	
16th 6:19	27B 32:24		
17 28:4,5	<hr/> 3 <hr/>		
17th 34:13	3 14:10		
	30th 6:5 33:14		
	35:8		
	35 1:3 3:10,12		