

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
DRYCLEANER ENVIRONMENTAL)
RESPONSE TRUST FUND ACT) R21-19
PROPOSAL TO ADD 35 ILL.)
ADM. C)

Hearing held on the 9th day of September 2021,
scheduled to begin at 10:00 a.m. at EPA, 1021 North
Grand Avenue East, Springfield, Illinois, pursuant to
notice.

BEFORE:

MR. MARK KAMINSKI, Attorney/Hearing Officer
MS. JENNIFER VAN WIE, Board Member
MR. ANAND RAO, Chief Environmental Scientist
MS. ESSENCE BROWN, Environmental Scientist

ALSO APPEARING:

MS. MARY TIPSORD, General Counsel
MS. SHANNON BILBRUCK, Administrative Assistant

L.A. COURT REPORTERS, LLC
8 West Monroe Street, Suite 2007
Chicago, Illinois 60603
(312) 419-9292

1 APPEARANCES:

2 On behalf of the Illinois Environmental Protection
3 Agency:

4 MR. JOHN M. McDONOUGH, II
5 MS. GINA ROCCAFORTE
6 MR. NICK M. SAN DIEGO
7 1021 North Grand Avenue East
8 Springfield, Illinois 62794
9 Ph. (217) 758-3347
10
11
12
13
14
15
16
17
18
19
20
21
22

23 Reported by: Carla Boehl, CSR
24 Lic. #084-002710

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

I N D E X

WITNESSES	PAGE
JAMES JENNINGS	
Examination by Mr. Rao	8
Examination by Ms. Van Wie	15
Examination by Ms. Kratz	16
EXHIBITS	ADMITTED
Hearing Exhibit 1	20
Hearing Exhibit 2	20

PROCEEDINGS

1
2 HEARING OFFICER KAMINSKI: Good morning, and
3 welcome to the Illinois Pollution Control Board
4 hearing. My name is Mark Kaminski. That's
5 K-A-M-I-N-S-K-I. And I am the hearing officer for
6 this rulemaking proceeding entitled Rulemaking for
7 Drycleaner Environmental Response Trust Fund Act
8 Proposal to add Illinois Administrative Code --
9 sorry, to add 35 Illinois Administrative Code Part
10 1501 and repeal 35 Illinois Administrative Code Part
11 1500 and repeal 2 Illinois Administrative Code Part
12 3100. The Board docket number for this rulemaking is
13 R21-19.

14 Also present today for the Board are
15 Board Member Van Wie and Board Staff Anand Rao,
16 Essence Brown, Mary Tipsord and Shannon Bilbruck.

17 As a note, there was a request for a
18 translator for Korean, and we were unable to engage a
19 translator in time for the Springfield hearing, but
20 we will have one for the Chicago hearing. That's
21 supposed to be scheduled for October 7, 2021.

22 However, I would note that, due to some remodeling or
23 rebuilding in the Bilandic building, we are still
24 determining where we are going to hold that, and we

1 will provide that information on COOL and as soon as
2 we can.

3 This hearing is governed by the Board's
4 procedural rules. All information that is relevant
5 and that is not repetitious or privileged will be
6 admitted into the record. Please bear in mind that
7 any questions posed to either the Board or the staff
8 are intended solely to help us develop a clear and
9 complete record for the Board's decision and do not
10 reflect a decision on the proposal, testimony or
11 other questions.

12 For the sake of our court reporter,
13 please speak clearly and avoid speaking at the same
14 time as the other person, so we can help produce a
15 clear transcript. Also, speak loudly through your
16 masks. I'm sure it will be difficult in this room.

17 Also, if you can, please provide a card
18 or spell out your name the first time you speak.
19 There is a comment sign-in paper in the back. Please
20 note if you have any time constraints, and also note
21 that you can submit written public comments on the
22 Board's COOL system.

23 There is a Board open meeting at eleven
24 o'clock today, so we will be recessing around 10:50

1 in order to do that, but we will be back fairly
2 quickly.

3 This is the first hearing in this
4 proceeding. Notice of this hearing was posted on
5 July 15, 2021. The Board published notice of this
6 second hearing -- I'm sorry, first hearing on July
7 19, 2021, in the State Journal Register and the
8 Chicago Sun Times.

9 On July 15, 2021, the hearing officer
10 directed that any prefiled testimony was to have been
11 filed with the Board by July 29, 2021. Any prefiled
12 questions based on the prefiled testimony or first
13 hearing testimony was to have been filed with the
14 Board by August 19, 2021.

15 On July 26 the Board received prefiled
16 testimony on behalf of the Agency by a James
17 Jennings. No additional prefiled testimony was
18 received.

19 August 19, 2021, prefiled questions were
20 submitted by Sung Kang in response to prefiled
21 testimony of Agency witness James Jennings, and also
22 on August 19, 2021, the hearing officer issued an
23 order containing Board questions directed at the
24 agency.

1 On September 2, 2021, the Agency filed
2 its response to the Board's questions, and the
3 questions submitted by Sung Kang.

4 The proposed proceeding of this, the
5 order, will be a summary introduction by the Agency
6 and introduction of James Jennings, questions for
7 Mr. Jennings, and if there are any other witnesses
8 that did not prefile, we will identify those. We
9 will deal with those. And then, finally, public
10 comments, if there are any available.

11 At this time I would like for the Agency
12 to introduce yourselves and introduce your testimony,
13 and if you want to offer any general descriptions
14 before we get to the questions.

15 MR. McDONOUGH: Good morning. My name is
16 John McDonough. I am assistant counsel of the Land
17 Regulatory Unit of the Illinois Environmental
18 Protection Agency's Division of Legal Counsel.
19 Joining me is Deputy General Counsel Nick San Diego
20 and Assistant Counsel Gina Roccaforte. Our witness
21 for today is James Jennings, manager of the Waste
22 Reduction and Compliance Section for the Agency's
23 Bureau of Land.

24 The Agency moves pursuant to Title 35,

1 Section 102.424(f) of the Illinois Administrative
2 Code to swear in the Agency's witness as well as
3 enter the Agency's prefiled testimony and responses
4 to the record as if read.

5 HEARING OFFICER KAMINSKI: Under 102.424(f)
6 the prefiled testimony is entered into the record as
7 if read. Please swear the witness.

8 (Whereupon the witness was duly
9 sworn by the Notary Public.)

10 MR. McDONOUGH: At this time the Agency opens
11 up for questions from the Board or from the floor.

12 HEARING OFFICER KAMINSKI: At this point,
13 Mr. Rao, do you have questions for the witness?

14 MR. RAO: Yes, I have a few follow-up
15 questions.

16 JAMES JENNINGS

17 called as a witness on behalf of the Illinois
18 Environmental Protection Agency, having been first
19 duly sworn, was examined and testified as follows:

20 EXAMINATION

21 BY MR. RAO:

22 **Q. Good morning, Mr. Jennings. Thank you**
23 **for your answers. They were helpful. The first**
24 **follow-up I have is on Question Number 7. It would**

1 be with Section 1501.116(b) as in boy. This activity
2 requires the owners and operators to provide the
3 Agency or its duly-authorized representatives proper
4 facilities for access for inspection and copying.
5 Can you, please, elaborate on what constitutes proper
6 facilities? This is a question that I would ask
7 because sometimes JCAR approves certain factors to
8 define what it means. So, it would be helpful.

9 A. Yeah. So, good morning, everybody.
10 Thank you for your time. So, how we've sought to
11 develop this rule is for our enforcement of this from
12 here and our other inspection enforcement programs.
13 So, to that end every site is somewhat unique. And
14 within this industry, and based on the comments that
15 we have received out of this process, there is a
16 pretty wide range of the types of facilities that may
17 be available to individual dry cleaners.

18 Ultimately, what we seek to see from a
19 dry cleaner from whom we have requested records would
20 be either hard copies of records that are retained on
21 site, electronic copies that may be sent to us and
22 available for our inspection, or a level of
23 commitment from the dry cleaners inspected that would
24 enable us to have those records within some

1 reasonable time. We see this very commonly in other
2 solid waste and hazardous waste programs.

3 HEARING OFFICER KAMINSKI: Mr. Jennings,
4 could you speak up a little bit so the rest of the
5 room can hear?

6 A. Yes. Yeah, so we see these types of
7 record requests very commonly for other solid waste
8 and hazardous waste programs. In some cases the
9 recordkeeping requirements are pretty express.

10 That's very common for landfills. But for any of
11 these that vary in size and potentially
12 sophistication, we take a flexible approach.

13 So, here one end of the spectrum would be
14 a site that neither has the records and has no access
15 to the records, and can't outline a plan for access
16 to the records. In that case you potentially have a
17 compliance issue with this provision. Otherwise, if
18 the site has the records onsite or a meaningful way
19 to transmit those to us in a timely manner, we would
20 be comfortable with their satisfaction of these
21 requirements.

22 **Q. Would it change the intent of this**
23 **program if we removed the word "proper" from it?**
24 **Instead of "proper facility," could we just say**

1 **"facility" for such records?**

2 A. So, we want to take a look.

3 **Q. Okay.**

4 A. Not because of any necessary concern with
5 that, that request. But one of the objectives that
6 we had in developing this rule was to be as faithful
7 as possible to the rules that the dry cleaner council
8 has historically maintained and to avoid any
9 potential implementation confusion within the
10 regulated community.

11 So, again, we don't have a conceptual
12 objection. We just want to confirm that that's
13 language that was not included as part of their
14 historical --

15 **Q. Okay. The second follow-up I have is on**
16 **Question 9. In response to Question 9 the Agency**
17 **states that the records retention language proposed**
18 **in Section 1501.116(c)(7) reflects the possibility of**
19 **other longer retention periods that exist independent**
20 **of these rules. Could you, please, clarify whether**
21 **any existing council rules would be still applicable**
22 **to dry cleaners upon adoption of Part 1501?**

23 A. So, the council -- apart from the
24 enactment of 1501, no other council rules would

1 continue to exist, provided that Part 1500 was
2 repealed as part of this docket. What this provision
3 sought to capture was the possibility that there may
4 be other independent statutory requirements
5 applicable to dry cleaners or other similarly
6 situated businesses that would obligate them to
7 retain records on site. That's not an element that
8 we necessarily seek to enforce. What we were
9 attempting to avoid was the situation where a dry
10 cleaner may have a narrower record retention record
11 under these rules than somewhere else, and they may
12 fall afoul of those regulations by attempting to
13 comply with the minimum obligations set forth here.

14 **Q. Do you have any examples of those types**
15 **of provisions that we could -- you know, you've**
16 **mentioned the opinions of -- you know, it can help**
17 **the JCAR and also the regulated community, you know,**
18 **what it means to say other potential periods?**

19 A. I don't have any prepared today, but we
20 can certainly --

21 **Q. If you can get back to us, that would be**
22 **great.**

23 **The next follow-up I have is on your**
24 **response to Question 16(a). Here the Agency states**

1 that it does not oppose continuing education with
2 products developed by interested third parties that
3 are comparable to historic practices in this arena.
4 The first follow-up I have is, is the Agency familiar
5 with any historic practices addressing continuing
6 education for dry cleaners?

7 A. Yes, we are aware -- we are aware they
8 exist.

9 Q. And would it be possible for the Agency
10 to provide that information into the record so that
11 the Board can take a look at it, what kind of
12 practices are they following?

13 A. Yes. And just to be clear, some of the
14 information that we have from the historic
15 administration of the program directly mirrors the
16 prefiled response -- or prefiled information
17 submitted by Mr. Kang. So, we will provide that as
18 well. But, yes, we can absolutely provide the
19 information that's currently available to us.

20 Q. The next follow-up I have is I wanted to
21 know if the Agency consulted with the council or any
22 dry cleaner trade groups, such as the Dry Cleaning
23 and Laundry Institute International, to determine if
24 there are any accepted practices or certification

1 **programs that could be used to model regulations for**
2 **continuing education.**

3 A. So, to the extent that the Agency did,
4 that would have been part of the discussions that
5 were ongoing during the legislative process. I was
6 part -- I was part of that discussion but not part of
7 the discussion that would have touched on that. And
8 so as we sit here today, I can't specifically recall
9 any of those discussions. But we can survey the
10 folks we have on staff who did participate and see
11 what, if any, communications they may have had.

12 **Q. Okay. That would be helpful. Any**
13 **information regarding these continuing education, if**
14 **you can provide those, it would be helpful to the**
15 **Board.**

16 **And one last question I had was, when the**
17 **Agency was developing this proposal, did the Agency**
18 **review regulations of other states who may have**
19 **continuing education programs as part of their rules?**

20 A. I did not. But, again, to the extent
21 that we have people who remain on staff who were part
22 of that evaluation, we can confirm and see what, if
23 any, source material they may have examined.

24 MR. RAO: Okay. That's all I have. Thank

1 you.

2 HEARING EXAMINER KAMINSKI: All right.

3 Mr. Kang, do you have any additional questions?

4 MR. KANG: I don't think I do. Not at this
5 time.

6 HEARING EXAMINER KAMINSKI: Does anyone else
7 have any questions for the EPA witness, Mr. Jennings?

8 EXAMINATION

9 BY MS. VAN WIE:

10 **Q. Will the EPA be hiring any new inspectors**
11 **specifically to conduct the dry cleaning facility**
12 **inspections?**

13 A. Not to my knowledge. At this point the
14 proposal would be to add proposed technical employees
15 to the fold as part of these inspections as well as a
16 variety of others. At this point our field
17 inspectors are primarily tasked with a wide portfolio
18 of individual inspections, and this would be along
19 those same lines.

20 **Q. Do you know if they will be receiving any**
21 **kind of specialized training on the dry cleaner --**
22 **the requirements of the dry cleaner act and the**
23 **regulations as they are written?**

24 A. Yes. So, as with any of our other

1 regulatory programs, they receive training going over
2 the relevant statutory authority and regulatory
3 requirements before going on site.

4 MS. VAN WIE: Okay. Thank you.

5 HEARING OFFICER KAMINSKI: Thank you. For
6 the record is there anyone else present here today
7 that did not prefile testimony for this hearing but
8 would like to offer testimony?

9 Does anyone here have further questions
10 for the Agency witness?

11 MS. KRATZ: My name is Sue Kratz, K-R-A-T-Z,
12 and I am the executive director for the Illinois
13 Professional Dry Cleaners Association. I also
14 represent one of the existing compliance programs
15 that has been in place with the fund for 25 years.

16 EXAMINATION

17 BY MS. KRATZ:

18 **Q. And my question is, is it the intent of**
19 **the EPA to eliminate all those compliance programs**
20 **that exist and take over the inspection process?**

21 THE WITNESS: This is procedural. Which do
22 you prefer? Me to address the witness or the court
23 reporter?

24 HEARING OFFICER KAMINSKI: Well, speak toward

1 the court reporter loudly enough so that she can hear
2 you.

3 THE WITNESS: All right. Perfect. I
4 basically didn't want to be rude.

5 A. So, those are really, as we see it, two
6 independent issues. The Agency did not propose, as
7 you know, a compliance program, but we don't
8 necessarily oppose one. That's just not the type of
9 operation that typically falls within our portfolio.
10 And so to the extent that the Board adopts a
11 compliance program that includes independent off-site
12 inspections, depending on the language, we would be
13 essentially comfortable with that.

14 Independent of that program, though, the
15 Agency has obligations under state law and
16 obligations to the federal government to inspect a
17 variety of sites, and some of those are dry cleaners.
18 And so in those cases there is a possibility that you
19 could have a facility that is inspected by our
20 inspectors through the prism of either the Resource
21 Conservation Recovery Act or for compliance with this
22 act that would also be inspected as part of a
23 compliance program that was headed -- just the two
24 heads, slightly different carrots and sticks that are

1 applicable. But if a compliance program were
2 adopted, it would not be the Agency's intent to
3 eliminate other inspections.

4 HEARING OFFICER KAMINSKI: Are there any
5 other questions for the Agency witness?

6 (No response.)

7 At this point we will take a five-minute
8 break. We will go off the record.

9 (Whereupon the hearing was in a
10 short recess.)

11 HEARING OFFICER KAMINSKI: Go back on the
12 record.

13 At this point is there anyone present
14 interested in offering any oral comments on the
15 record?

16 (No response.)

17 At this point I would note that, if
18 anyone wants to submit comments, written comments,
19 you can file those on the COOL system. That's
20 C-O-O-L system, which is available on the Illinois
21 Pollution Control Board website. And I would note
22 that at this point there are no comments being
23 requested now.

24 I would note that right now it is

1 September 9. The transcript will be -- should be
2 available on the 16th. At this point the second
3 hearing is scheduled for October 7, 2021, in Chicago.
4 As I've stated, the hearing was to be held in the
5 Michael J. Bilandic building in Chicago. However,
6 due to renovations, the location will be changed to
7 another Chicago venue. When a new location is
8 settled, it will be provided on the COOL system.

9 And before we go any further, I would
10 note that we have a Board hearing in about a half an
11 hour. To give some additional time for folks to show
12 up for this noticed hearing, we would like to hold
13 the hearing -- we will recess until shortly after the
14 Board meeting. So, at this point let's put it on
15 hold and go off the record until we come back from
16 the Board meeting, shortly after eleven o'clock, I
17 would expect. Thank you.

18 (Whereupon the hearing was in a
19 short recess until 11:24 a.m.)

20 HEARING OFFICER KAMINSKI: Thank you. We are
21 back on the record.

22 While off the record, we attended the
23 Board meeting, and giving the opportunity for any
24 further public comments. We noted that there is no

1 more people on the sign-in sheet. Does anybody want
2 to make a public comment that's in the room?

3 (No response.)

4 For the record no one has answered. I
5 will just note a couple of things. One,
6 housecleaning, regarding the prefiled testimony, we
7 are going to refer to that as Hearing Exhibit 1, if
8 that's okay. And the Agency's response to questions
9 to be Hearing Exhibit 2.

10 (Whereupon Hearing Exhibits 1
11 and 2 were presented for
12 purposes of identification as of
13 this date.)

14 At this point the deadline to prefile
15 testimony with regard to the second hearing is
16 September 23, 2021, by 4:30. Prefiled questions
17 based on the prefiled testimony will be filed with
18 the Board by 4:30 on September 30 of this year. If
19 participants wish to prefile answers, those answers
20 should be prefiled on October 4, 2021. Filings with
21 the Board, whether paper or electronic, must also be
22 served on the hearing officer and those persons on
23 the service list. Before filing, please check on
24 COOL or with the Board's clerk to insure that the

1 most recent version of the service list is what you
2 are using.

3 As I stated earlier, participants have
4 requested a Korean translator for the second hearing,
5 and a translator has been engaged.

6 Are there any other matters to be
7 addressed at this time? Please go ahead.

8 MR. McDONOUGH: For post-hearing comments, I
9 believe you said the transcript will be available on
10 September 16 and then any comments or follow-ups that
11 we would like to submit. When would you like those
12 to you by?

13 HEARING OFFICER KAMINSKI: Ideally, we would
14 like those by the same -- September 23. However,
15 given that we have another hearing, if you can't get
16 them in by then, at least by on the 30th.

17 MR. McDONOUGH: Okay.

18 HEARING OFFICER KAMINSKI: Anything else?

19 (No response.)

20 Okay. I would like to thank everyone for
21 participating today and waiting for us to get back
22 from the open meeting. The first hearing is now
23 adjourned. Thank you.

24 CONCLUDED AT 11:26 A.M.

1 STATE OF ILLINOIS)
)SS
2 COUNTY OF MACOUPIN)

3 C E R T I F I C A T E

4 I, Carla J. Boehl, a Notary Public and Certified
5 Shorthand Reporter, do hereby certify on the 9th day
6 of September 2021, the foregoing matter was taken
7 down in shorthand by me and afterwards reduced to
8 typewritten form by me, and that the foregoing
9 transcript contains a true and accurate translation
10 of all such shorthand notes.

11 Given under my hand and seal this 11th day of
12 September 2021, at Virden, Illinois.

13 My commission expires April 13, 2023.
14
15
16
17
18
19
20
21

22 _____
23 Notary Public
24 Certified Shorthand Reporter
Lic. #084-002710

A	apart 11:23	4:12,14,15,15	16:13 17:17	containing 6:23
a.m 1:9 19:19	APPEARANCES	5:7,23 6:5,11,14	cleaning 13:22	contains 22:9
21:24	2:1	6:15,23 8:11	15:11	continue 12:1
absolutely 13:18	APPEARING	13:11 14:15	clear 5:8,15 13:13	continuing 13:1,5
accepted 13:24	1:17	17:10 18:21	clearly 5:13	14:2,13,19
access 9:4 10:14	applicable 11:21	19:10,14,16,23	clerk 20:24	Control 1:1 4:3
10:15	12:5 18:1	20:18,21	Code 4:8,9,10,11	18:21
accurate 22:9	approach 10:12	Board's 5:3,9,22	8:2	COOL 5:1,22
act 1:4 4:7 15:22	approves 9:7	7:2 20:24	come 19:15	18:19 19:8
17:21,22	April 22:13	Boehl 2:23 22:4	comfortable 10:20	20:24
activity 9:1	arena 13:3	boy 9:1	17:13	copies 9:20,21
add 1:4 4:8,9	assistant 1:18	break 18:8	comment 5:19	copying 9:4
15:14	7:16,20	Brown 1:15 4:16	20:2	council 11:7,21,23
additional 6:17	Association 16:13	building 4:23 19:5	comments 5:21	11:24 13:21
15:3 19:11	attempting 12:9	Bureau 7:23	7:10 9:14 18:14	counsel 1:18 7:16
address 16:22	12:12	businesses 12:6	18:18,18,22	7:18,19,20
addressed 21:7	attended 19:22	C	19:24 21:8,10	COUNTY 22:2
addressing 13:5	Attorney/Hearing	C 1:5 22:3,3	commission 22:13	couple 20:5
adjourned 21:23	1:14	C-O-O-L 18:20	commitment 9:23	court 1:22 5:12
ADM 1:5	August 6:14,19,22	called 8:17	common 10:10	16:22 17:1
administration	authority 16:2	capture 12:3	commonly 10:1,7	CSR 2:23
13:15	available 7:10	card 5:17	communications	currently 13:19
Administrative	9:17,22 13:19	Carla 2:23 22:4	14:11	D
1:18 4:8,9,10,11	18:20 19:2 21:9	carrots 17:24	community 11:10	D 3:1
8:1	Avenue 1:10 2:4	case 10:16	12:17	date 20:13
admitted 3:9 5:6	avoid 5:13 11:8	cases 10:8 17:18	comparable 13:3	day 1:8 22:5,11
adopted 18:2	12:9	certain 9:7	complete 5:9	deadline 20:14
adoption 11:22	aware 13:7,7	certainly 12:20	compliance 7:22	deal 7:9
adopts 17:10	B	certification	10:17 16:14,19	decision 5:9,10
afoul 12:12	back 5:19 6:1	13:24	17:7,11,21,23	define 9:8
agency 2:2 6:16	12:21 18:11	Certified 22:4,23	18:1	depending 17:12
6:21,24 7:1,5,11	19:15,21 21:21	certify 22:5	comply 12:13	Deputy 7:19
7:24 8:10,18 9:3	based 6:12 9:14	change 10:22	conceptual 11:11	descriptions 7:13
11:16 12:24	20:17	changed 19:6	concern 11:4	determine 13:23
13:4,9,21 14:3	basically 17:4	check 20:23	CONCLUDED	determining 4:24
14:17,17 16:10	bear 5:6	Chicago 1:23 4:20	21:24	develop 5:8 9:11
17:6,15 18:5	behalf 2:2 6:16	6:8 19:3,5,7	conduct 15:11	developed 13:2
Agency's 7:18,22	8:17	Chief 1:15	confirm 11:12	developing 11:6
8:2,3 18:2 20:8	believe 21:9	clarify 11:20	14:22	14:17
ahead 21:7	Bilandic 4:23 19:5	cleaner 9:19 11:7	confusion 11:9	Diego 2:4 7:19
Anand 1:15 4:15	Bilbruck 1:18	12:10 13:22	Conservation	different 17:24
answered 20:4	4:16	15:21,22	17:21	difficult 5:16
answers 8:23	bit 10:4	cleaners 9:17,23	constitutes 9:5	directed 6:10,23
20:19,19	Board 1:1,14 4:3	11:22 12:5 13:6	constraints 5:20	directly 13:15
anybody 20:1			consulted 13:21	

<p>director 16:12 discussion 14:6,7 discussions 14:4,9 Division 7:18 docket 4:12 12:2 dry 9:17,19,23 11:7,22 12:5,9 13:6,22,22 15:11 15:21,22 16:13 17:17 Drycleaner 1:3 4:7 due 4:22 19:6 duly 8:8,19 duly-authorized 9:3</p> <hr/> <p style="text-align: center;">E</p> <p>E 3:1 22:3,3 earlier 21:3 East 1:10 2:4 education 13:1,6 14:2,13,19 either 5:7 9:20 17:20 elaborate 9:5 electronic 9:21 20:21 element 12:7 eleven 5:23 19:16 eliminate 16:19 18:3 employees 15:14 enable 9:24 enactment 11:24 enforce 12:8 enforcement 9:11 9:12 engage 4:18 engaged 21:5 enter 8:3 entered 8:6 entitled 4:6 Environmental 1:3,15,15 2:2</p>	<p>4:7 7:17 8:18 EPA 1:9 15:7,10 16:19 Essence 1:15 4:16 essentially 17:13 evaluation 14:22 everybody 9:9 Examination 3:4 3:4,5 8:20 15:8 16:16 examined 8:19 14:23 EXAMINER 15:2 15:6 examples 12:14 executive 16:12 Exhibit 3:10,11 20:7,9 Exhibits 3:9 20:10 exist 11:19 12:1 13:8 16:20 existing 11:21 16:14 expect 19:17 expires 22:13 express 10:9 extent 14:3,20 17:10</p> <hr/> <p style="text-align: center;">F</p> <p>F 22:3 facilities 9:4,6,16 facility 10:24 11:1 15:11 17:19 factors 9:7 fairly 6:1 faithful 11:6 fall 12:12 falls 17:9 familiar 13:4 federal 17:16 field 15:16 file 18:19 filed 6:11,13 7:1 20:17</p>	<p>filing 20:23 Filings 20:20 finally 7:9 first 5:18 6:3,6,12 8:18,23 13:4 21:22 five-minute 18:7 flexible 10:12 floor 8:11 fold 15:15 folks 14:10 19:11 follow-up 8:14,24 11:15 12:23 13:4,20 follow-ups 21:10 following 13:12 follows 8:19 foregoing 22:6,8 form 22:8 forth 12:13 fund 1:4 4:7 16:15 further 16:9 19:9 19:24</p> <hr/> <p style="text-align: center;">G</p> <p>general 1:18 7:13 7:19 Gina 2:3 7:20 give 19:11 given 21:15 22:11 giving 19:23 go 18:8,11 19:9,15 21:7 going 4:24 16:1,3 20:7 good 4:2 7:15 8:22 9:9 governed 5:3 government 17:16 Grand 1:10 2:4 great 12:22 groups 13:22</p> <hr/> <p style="text-align: center;">H</p> <p>half 19:10 hand 22:11</p>	<p>hard 9:20 hazardous 10:2,8 headed 17:23 heads 17:24 hear 10:5 17:1 hearing 1:8 3:10 3:11 4:2,4,5,19 4:20 5:3 6:3,4,6 6:6,9,13,22 8:5 8:12 10:3 15:2,6 16:5,7,24 18:4,9 18:11 19:3,4,10 19:12,13,18,20 20:7,9,10,15,22 21:4,13,15,18,22 held 1:8 19:4 help 5:8,14 12:16 helpful 8:23 9:8 14:12,14 hiring 15:10 historic 13:3,5,14 historical 11:14 historically 11:8 hold 4:24 19:12 19:15 hour 19:11 housecleaning 20:6</p> <hr/> <p style="text-align: center;">I</p> <p>Ideally 21:13 identification 20:12 identify 7:8 II 2:3 ILL 1:4 Illinois 1:1,10,23 2:2,5 4:3,8,9,10 4:11 7:17 8:1,17 16:12 18:20 22:1,12 implementation 11:9 included 11:13 includes 17:11</p>	<p>independent 11:19 12:4 17:6 17:11,14 individual 9:17 15:18 industry 9:14 information 5:1,4 13:10,14,16,19 14:13 inspect 17:16 inspected 9:23 17:19,22 inspection 9:4,12 9:22 16:20 inspections 15:12 15:15,18 17:12 18:3 inspectors 15:10 15:17 17:20 Institute 13:23 insure 20:24 intended 5:8 intent 10:22 16:18 18:2 interested 13:2 18:14 International 13:23 introduce 7:12,12 introduction 7:5,6 issue 10:17 issued 6:22 issues 17:6</p> <hr/> <p style="text-align: center;">J</p> <p>J 19:5 22:4 James 3:3 6:16,21 7:6,21 8:16 JCAR 9:7 12:17 JENNIFER 1:14 Jennings 3:3 6:17 6:21 7:6,7,21 8:16,22 10:3 15:7 John 2:3 7:16</p>
---	--	--	--	---

Joining 7:19 Journal 6:7 July 6:5,6,9,11,15	<hr/> M <hr/> M 2:3,4 MACOUPIN 22:2 maintained 11:8 manager 7:21 manner 10:19 Mark 1:14 4:4 Mary 1:18 4:16 masks 5:16 material 14:23 matter 1:3 22:6 matters 21:6 McDONOUGH 2:3 7:15,16 8:10 21:8,17 meaningful 10:18 means 9:8 12:18 meeting 5:23 19:14,16,23 21:22 Member 1:14 4:15 mentioned 12:16 Michael 19:5 mind 5:6 minimum 12:13 mirrors 13:15 model 14:1 Monroe 1:23 morning 4:2 7:15 8:22 9:9 moves 7:24	Notary 8:9 22:4 22:22 note 4:17,22 5:20 5:20 18:17,21,24 19:10 20:5 noted 19:24 notes 22:10 notice 1:11 6:4,5 noticed 19:12 number 4:12 8:24	PAGE 3:2 paper 5:19 20:21 part 4:9,10,11 11:13,22 12:1,2 14:4,6,6,6,19,21 15:15 17:22 participants 20:19 21:3 participate 14:10 participating 21:21 parties 13:2 people 14:21 20:1 Perfect 17:3 periods 11:19 12:18 person 5:14 persons 20:22 Ph 2:5 place 16:15 plan 10:15 please 5:6,13,17 5:19 8:7 9:5 11:20 20:23 21:7 point 8:12 15:13 15:16 18:7,13,17 18:22 19:2,14 20:14 Pollution 1:1 4:3 18:21 portfolio 15:17 17:9 posed 5:7 possibility 11:18 12:3 17:18 possible 11:7 13:9 post-hearing 21:8 posted 6:4 potential 11:9 12:18 potentially 10:11 10:16 practices 13:3,5 13:12,24	prefer 16:22 profile 7:8 16:7 20:14,19 prefiled 6:10,11 6:12,15,17,19,20 8:3,6 13:16,16 20:6,16,17,20 prepared 12:19 present 4:14 16:6 18:13 presented 20:11 pretty 9:16 10:9 primarily 15:17 prism 17:20 privileged 5:5 procedural 5:4 16:21 proceeding 4:6 6:4 7:4 PROCEEDINGS 4:1 process 9:15 14:5 16:20 produce 5:14 products 13:2 Professional 16:13 program 10:23 13:15 17:7,11,14 17:23 18:1 programs 9:12 10:2,8 14:1,19 16:1,14,19 proper 9:3,5 10:23,24 proposal 1:4 4:8 5:10 14:17 15:14 propose 17:6 proposed 7:4 11:17 15:14 Protection 2:2 7:18 8:18 provide 5:1,17 9:2 13:10,17,18
<hr/> K <hr/> K-A-M-I-N-S-... 4:5 K-R-A-T-Z 16:11 Kaminski 1:14 4:2,4 8:5,12 10:3 15:2,6 16:5 16:24 18:4,11 19:20 21:13,18 Kang 6:20 7:3 13:17 15:3,4 kind 13:11 15:21 know 12:15,16,17 13:21 15:20 17:7 knowledge 15:13 Korean 4:18 21:4 Kratz 3:5 16:11 16:11,17	<hr/> N <hr/> N 3:1 name 4:4 5:18 7:15 16:11 narrower 12:10 necessarily 12:8 17:8 necessary 11:4 neither 10:14 new 15:10 19:7 Nick 2:4 7:19 North 1:9 2:4	<hr/> O <hr/> o'clock 5:24 19:16 objection 11:12 objectives 11:5 obligate 12:6 obligations 12:13 17:15,16 October 4:21 19:3 20:20 off-site 17:11 offer 7:13 16:8 offering 18:14 officer 1:14 4:2,5 6:9,22 8:5,12 10:3 16:5,24 18:4,11 19:20 20:22 21:13,18 okay 11:3,15 14:12,24 16:4 20:8 21:17,20 ongoing 14:5 onsite 10:18 open 5:23 21:22 opens 8:10 operation 17:9 operators 9:2 opinions 12:16 opportunity 19:23 oppose 13:1 17:8 oral 18:14 order 6:1,2,3 7:5 outline 10:15 owners 9:2	Ph 2:5 place 16:15 plan 10:15 please 5:6,13,17 5:19 8:7 9:5 11:20 20:23 21:7 point 8:12 15:13 15:16 18:7,13,17 18:22 19:2,14 20:14 Pollution 1:1 4:3 18:21 portfolio 15:17 17:9 posed 5:7 possibility 11:18 12:3 17:18 possible 11:7 13:9 post-hearing 21:8 posted 6:4 potential 11:9 12:18 potentially 10:11 10:16 practices 13:3,5 13:12,24	
<hr/> L <hr/> L.A 1:22 Land 7:16,23 landfills 10:10 language 11:13,17 17:12 Laundry 13:23 law 17:15 Legal 7:18 legislative 14:5 let's 19:14 level 9:22 Lic 2:24 22:23 lines 15:19 list 20:23 21:1 little 10:4 LLC 1:22 location 19:6,7 longer 11:19 look 11:2 13:11 loudly 5:15 17:1	<hr/> P <hr/> P			

14:14 provided 12:1 19:8 provision 10:17 12:2 provisions 12:15 public 5:21 7:9 8:9 19:24 20:2 22:4,22 published 6:5 purposes 20:12 pursuant 1:10 7:24 put 19:14	13:10 16:6 18:8 18:12,15 19:15 19:21,22 20:4 recordkeeping 10:9 records 9:19,20 9:24 10:14,15,16 10:18 11:1,17 12:7 Recovery 17:21 reduced 22:7 Reduction 7:22 refer 20:7 reflect 5:10 reflects 11:18 regard 20:15 regarding 14:13 20:6 Register 6:7 regulated 11:10 12:17 regulations 12:12 14:1,18 15:23 regulatory 7:17 16:1,2 relevant 5:4 16:2 remain 14:21 remodeling 4:22 removed 10:23 renovations 19:6 repeal 4:10,11 repealed 12:2 repetitious 5:5 Reported 2:23 reporter 5:12 16:23 17:1 22:5 22:23 REPORTERS 1:22 represent 16:14 representatives 9:3 request 4:17 11:5 requested 9:19 18:23 21:4	requests 10:7 requirements 10:9,21 12:4 15:22 16:3 requires 9:2 Resource 17:20 response 1:4 4:7 6:20 7:2 11:16 12:24 13:16 18:6,16 20:3,8 21:19 responses 8:3 rest 10:4 retain 12:7 retained 9:20 retention 11:17 11:19 12:10 review 14:18 right 15:2 17:3 18:24 Roccaforte 2:3 7:20 room 5:16 10:5 20:2 rude 17:4 rule 9:11 11:6 rulemaking 4:6,6 4:12 rules 5:4 11:7,20 11:21,24 12:11 14:19	14:10,22 17:5 seek 9:18 12:8 sent 9:21 September 1:8 7:1 19:1 20:16,18 21:10,14 22:6,12 served 20:22 service 20:23 21:1 set 12:13 settled 19:8 Shannon 1:18 4:16 sheet 20:1 short 18:10 19:19 shorthand 22:5,7 22:10,23 shortly 19:13,16 show 19:11 sign-in 5:19 20:1 similarly 12:5 sit 14:8 site 9:13,21 10:14 10:18 12:7 16:3 sites 17:17 situated 12:6 situation 12:9 size 10:11 slightly 17:24 solely 5:8 solid 10:2,7 somewhat 9:13 soon 5:1 sophistication 10:12 sorry 4:9 6:6 sought 9:10 12:3 source 14:23 speak 5:13,15,18 10:4 16:24 speaking 5:13 specialized 15:21 specifically 14:8 15:11 spectrum 10:13 spell 5:18	Springfield 1:10 2:5 4:19 SS 22:1 staff 4:15 5:7 14:10,21 state 6:7 17:15 22:1 stated 19:4 21:3 states 11:17 12:24 14:18 statutory 12:4 16:2 sticks 17:24 Street 1:23 submit 5:21 18:18 21:11 submitted 6:20 7:3 13:17 Sue 16:11 Suite 1:23 summary 7:5 Sun 6:8 Sung 6:20 7:3 supposed 4:21 sure 5:16 survey 14:9 swear 8:2,7 sworn 8:9,19 system 5:22 18:19 18:20 19:8
<hr/> Q <hr/> question 8:24 9:6 11:16,16 12:24 14:16 16:18 questions 5:7,11 6:12,19,23 7:2,3 7:6,14 8:11,13 8:15 15:3,7 16:9 18:5 20:8,16 quickly 6:2				
<hr/> R <hr/> R 22:3 R21-19 1:4 4:13 range 9:16 Rao 1:15 3:4 4:15 8:13,14,21 14:24 read 8:4,7 really 17:5 reasonable 10:1 rebuilding 4:23 recall 14:8 receive 16:1 received 6:15,18 9:15 receiving 15:20 recess 18:10 19:13 19:19 recessing 5:24 record 5:6,9 8:4,6 10:7 12:10,10				
		<hr/> S <hr/> sake 5:12 San 2:4 7:19 satisfaction 10:20 scheduled 1:9 4:21 19:3 Scientist 1:15,15 seal 22:11 second 6:6 11:15 19:2 20:15 21:4 Section 7:22 8:1 9:1 11:18 see 9:18 10:1,6		
			<hr/> T <hr/> T 22:3,3 take 10:12 11:2 13:11 16:20 18:7 taken 22:6 tasked 15:17 technical 15:14 testified 8:19 testimony 5:10 6:10,12,13,16,17 6:21 7:12 8:3,6 16:7,8 20:6,15 20:17	

thank 8:22 9:10 14:24 16:4,5 19:17,20 21:20 21:23 things 20:5 think 15:4 third 13:2 time 4:19 5:14,18 5:20 7:11 8:10 9:10 10:1 15:5 19:11 21:7 timely 10:19 Times 6:8 Tipsord 1:18 4:16 Title 7:24 today 4:14 5:24 7:21 12:19 14:8 16:6 21:21 touched 14:7 trade 13:22 training 15:21 16:1 transcript 5:15 19:1 21:9 22:9 translation 22:9 translator 4:18,19 21:4,5 transmit 10:19 true 22:9 Trust 1:4 4:7 two 17:5,23 type 17:8 types 9:16 10:6 12:14 typewritten 22:8 typically 17:9	variety 15:16 17:17 vary 10:11 venue 19:7 version 21:1 Viriden 22:12	<hr/> 1 <hr/> 1 3:10 20:7,10 10:00 1:9 10:50 5:24 102.424(f) 8:1,5 1021 1:9 2:4 11:24 19:19 11:26 21:24 11th 22:11 13 22:13 15 3:4 6:5,9 1500 4:11 12:1 1501 4:10 11:22 11:24 1501.116(b) 9:1 1501.116(c)(7) 11:18 16 3:5 21:10 16(a) 12:24 16th 19:2 19 6:7,14,19,22	4 20:20 4:30 20:16,18 419-9292 1:24
<hr/> U <hr/> Ultimately 9:18 unable 4:18 unique 9:13 Unit 7:17	<hr/> W <hr/> waiting 21:21 want 7:13 11:2,12 17:4 20:1 wanted 13:20 wants 18:18 waste 7:21 10:2,2 10:7,8 way 10:18 we've 9:10 website 18:21 welcome 4:3 West 1:23 wide 9:16 15:17 Wie 1:14 3:4 4:15 15:9 16:4 wish 20:19 witness 6:21 7:20 8:2,7,8,13,17 15:7 16:10,21,22 17:3 18:5 witnesses 3:2 7:7 word 10:23 written 5:21 15:23 18:18	<hr/> 2 <hr/> 2 3:11 4:11 7:1 20:9,11 20 3:10,11 2007 1:23 2021 1:8 4:21 6:5 6:7,9,11,14,19 6:22 7:1 19:3 20:16,20 22:6,12 2023 22:13 217 2:5 23 20:16 21:14 25 16:15 26 6:15 29 6:11	<hr/> 5 <hr/> <hr/> 6 <hr/> 60603 1:23 62794 2:5
<hr/> V <hr/> Van 1:14 3:4 4:15 15:9 16:4	<hr/> X <hr/> X 3:1	<hr/> 3 <hr/> 30 20:18 30th 21:16 3100 4:12 312 1:24 35 1:4 4:9,10 7:24	<hr/> 7 <hr/> 7 4:21 8:24 19:3 758-3347 2:5
	<hr/> Y <hr/> Yeah 9:9 10:6 year 20:18 years 16:15	<hr/> 4 <hr/>	<hr/> 8 <hr/> 8 1:23 3:4
	<hr/> Z <hr/> <hr/> 0 <hr/> 084-002710 2:24 22:23		<hr/> 9 <hr/> 9 11:16,16 19:1 9th 1:8 22:5