

ILLINOIS POLLUTION CONTROL BOARD

April 7, 2022

IN THE MATTER OF:)
)
AMENDMENTS TO 35 ILL. ADM.)
CODE PART 203: MAJOR)
STATIONARY SOURCES) R 22-17
CONSTRUCTION AND)
MODIFICATION, 35 ILL. ADM.)
CODE PART 204: PREVENTION)
OF SIGNIFICANT)
DETERIORATION, AND PART)
232: TOXIC AIR CONTAMINANTS.)

REPORT OF PROCEEDINGS had and testimony taken at the Hearing of the above-entitled cause, taken before the ILLINOIS POLLUTION CONTROL BOARD, held on Thursday, the 7th day of April, 2022, at the hour of 9:00 A.M., by GLORIA APOSTOLOS SIOLIDIS, CSR License No. 084-001205, duly qualified and commissioned for the State of Illinois.

1 APPEARANCES:

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3 MR. DANIEL PAULEY, Hearing Officer

4 MS. JENNIFER VAN WIE, Board Member

5 MS. ANASTASIA PALIVOS, Board Member

6 MR. ANAND RAO, Board Technical Unit

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8 ILLINOIS ENVIRONMENTAL PROTECTION AGENCY BY:

9 MS. SALLY CARTER (via video)

10 MR. JASON SCHNEPP (via video)

11 ILLINOIS ENVIRONMENTAL REGULATORY GROUP BY:

12 MR. ALEC DAVIS (via video)

13 MR. COLIN CAMPBELL (via video)

14 MS. LADONNA DRIVER (via video)

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1 MR. PAULEY: Good morning and welcome to
2 this Illinois Pollution Control Board Hearing.

3 My name is Daniel Pauley and I'm a
4 Hearing Officer for this rule-making proceeding
5 entitled Amendments to Parts 203: Major Stationary
6 Sources, Construction and Modification. Part 204:
7 Prevention of Significant Deterioration. And 232:
8 Toxic Air Contaminants of Air Pollution
9 Regulations.

10 The Board docket for this rule making
11 is R 22-17.

12 Also present today from the Board are
13 members Anastasia Palivos, member Jennifer Van Wie.
14 And Board staff present are Anand Rao, Carlie
15 Leoni, Marie Tipsord and Shannon Bilbruck in
16 Springfield.

17 This hearing is governed by the Board's
18 procedural rules. All information that is relevant
19 and that is not repetitious or privileged will be
20 admitted into the record.

21 Please bear in mind that any questions
22 posed today by the Board and its staff are attended
23 solely to help develop a clear and complete record
24 for the Board's decision and do not reflect any

1 decision on the proposal, testimony or other
2 questions.

3 For the sake of our court reporter,
4 please speak clearly and avoid speaking at the same
5 time as another person so that we can help produce
6 a clear transcript.

7 A background on this rule making. On
8 August 16th, 2021 the Illinois Environment
9 Regulatory Group, or IERG, filed this rule-making
10 proposal with the Board.

11 The one hearing took place on
12 February 17, 2022 between Springfield and Chicago
13 via video conference.

14 The Board received no pre-trial
15 testimony for this hearing; however, the Board did
16 receive four public comments since the first
17 hearing. PC5 from the Illinois Attorney General's
18 Office, PC6 from IEPA, and PC7 from IERG as well.

19 As a result of the public comments, a
20 Hearing Officer Order dated April 4th, 2022, the
21 Board pre-filed questions for IEPA and IERG.

22 So if anybody does sign up for public
23 comment, we will start with those. Is anybody
24 wanting to give a public comment in Springfield?

1 (No response.)

2 MR. PAULEY: Thank you. And seeing nobody
3 in the Chicago room as well, we will move on and
4 start with the Board's pre-filed questions and then
5 we'll go to anybody else's questions as well.

6 All right. So Miss Carter, would you
7 like the witness to be sworn in now?

8 MS. CARTER: Yes, that's fine.

9 THE COURT REPORTER: Raise your right hand,
10 please.

11 (The oath was thereupon duly
12 administered to the witness by
13 the Notary.)

14 MR. PAULEY: So I am going to just go
15 through the questions that the Board filed, and if
16 there are any that you guys are going to answer,
17 I'll let you answer those there, and then whichever
18 ones you're going to file in post-hearing comments,
19 you can let me know as well.

20 So I'm just going to say the number
21 first before I read everything. Question number 1.

22 MS. CARTER: The agency will be addressing
23 in post-hearing comments.

24 MR. PAULEY: Thank you. Question number 2?

1 MS. CARTER: The agency will be addressing
2 in post-hearing comments.

3 MR. PAULEY: Question number 3?

4 MS. CARTER: Mr. Schnepf will provide an
5 answer.

6 MR. PAULEY: Thank you. So I will read the
7 question and then allow Mr. Schnepf to answer.

8 MS. CARTER: Okay.

9 MR. PAULEY: Regarding the proposed
10 definition of net emissions increase, under
11 Section 203.1260, please clarify whether the Agency
12 is proposing any revisions, or just providing an
13 explanation of the definitions.

14 MR. SCHNEPP: The Illinois EPA is proposing
15 one revision to the proposed definition of "net
16 emissions increase." In Section 203.1260(b)(3)(D),
17 which reads as follows. I'm skipping down to
18 capital D.

19 "The Agency has not relied on it in
20 issuing any permit under 35 Ill. ADM. Code 201.142
21 or 201.143 or this part or 35 Ill. ADM. Code
22 Part 204, or 40 CFR 52.21, emphasis added to the
23 words 40 CFR 52.21, and has not relied on it for
24 demonstrating attainment or reasonable further

1 progress.

2 "The remainder of the discussion of net
3 emissions increased on Pages 6 through 9 of the
4 Illinois EPA's initial comments and recommendations
5 for additional revisions referred to as initial
6 comments provided further explanation for the
7 definition."

8 MR. PAULEY: Thank you. We have a
9 follow-up?

10 MR. RAO: I have just a follow-up.

11 There are certain comments the Agency
12 has made, including the definition of net emissions
13 increase where you have provided the Agency's
14 interpretation of the proposed rules, and some of
15 the explanations differ from IERG's technical
16 support document descriptions.

17 So the question is whether IEPA wants
18 your interpretation to be memorialized in the
19 opinion, if the Board agrees with that?

20 MS. CARTER: The Agency will address that
21 in post-hearing comments.

22 MR. RAO: Okay, thank you.

23 MS. CARTER: Thank you.

24 MR. PAULEY: Okay. We'll move on to

1 question number 4.

2 MS. CARTER: The Illinois EPA defers its
3 response to its post-hearing comments.

4 MR. PAULEY: Thank you. Question No. 5?

5 MS. CARTER: Mr. Schnepf will be answering
6 that question.

7 MR. PAULEY: Okay. I will first read the
8 question and then give Mr. Schnepf an opportunity
9 to answer.

10 Regarding the significant emissions
11 rate for NOx and VOM in serious or severe ozone
12 attainment areas, the Agency states that the
13 information in the PSD table, Pages 19 and 20, is
14 inaccurate and incomplete. TC-6 at 23.

15 Further, the Agency provides
16 clarification of how "netting" must be applied to
17 be consistent with the U.S. EPA's guidance.

18 Please comment on whether any rule
19 language changes are necessary to maintain
20 consistency with the USEPA guidance on the
21 application of "netting" to determine significant
22 emissions of NOx and VOM.

23 If so, propose the appropriate language
24 changes.

1 MR. SCHNEPP: No rule language changes are
2 necessary.

3 The Illinois EPA's discussion on
4 Pages 23 through 25 of the Illinois EPA's initial
5 comments was offered to clarify and correct
6 information in the PSD table on Pages 19 through 20
7 as it addressed the significant emissions rate for
8 NOx and VOM in serious or severe ozone
9 non-attainment areas.

10 MR. PAULEY: All right. We'll go on to
11 question No. 6.

12 MS. CARTER: Mr. Schnepf will be providing
13 a response to that.

14 MR. PAULEY: Thank you.

15 On page 27, regarding the determination
16 of significant emissions increase from a proposed
17 NANSR project, the Agency clarifies that decreases
18 in emissions at affected emissions units resulting
19 from the projects need not be addressed with a
20 broader netting analysis for other contemporaneous
21 changes in emissions.

22 The Agency provides similar
23 clarification regarding PSD project on Pages 44 and
24 45.

1 Please clarify whether their proposed
2 rules under Sections 203.1410(c) and 204.800(d)
3 must include a provision reflecting the agency's
4 clarification to avoid any confusion with the
5 interpretation of their proposed regulations.

6 MR. SCHNEPP: No rule language changes are
7 necessary to proposed Sections 203.1410(c) and
8 204.800(d) to address the Illinois EPA's
9 clarification on page 27 at 44 through 45 of the
10 Illinois EPA's initial comments.

11 MR. PAULEY: Thank you.

12 And is there anybody who has any
13 follow-up questions for IEPA?

14 (No response.)

15 MR. PAULEY: All right. Hearing none,
16 Mr. Schnepf, you are all done.

17 And does anybody have any questions
18 that they would like to ask anybody on any of the
19 filings since the first hearing, or any other
20 filings?

21 (No response.)

22 MR. PAULEY: All right. Hearing none, let
23 me check in one more time to see if anybody wants
24 to give a public comment.

1 Seeing none in either room, I'll take a
2 moment to address the economic impact statement.

3 Section 27(b) of the Environment
4 Protection Act provides that the Board must request
5 that the Department of Commerce and Economic
6 Opportunity, DCEO, conduct an Economic Impact Study
7 of proposed rules before the Board adopts the
8 rules.

9 The Board must make either the Economic
10 Impact Study, or the department's explanation for
11 not conducting one available to the public at least
12 20 days before a public hearing.

13 In a letter dated September 9th, 2021,
14 the Board's Chair, Barbara Flynn Currie, requested
15 that DCEO conduct an Economic Impact Study of this
16 ruling and proposal.

17 On November 22nd, 2021, the Board
18 received a letter from the DCEO declining to
19 conduct an Economic Impact Study.

20 Is there anyone present today who would
21 like to testify regarding the Board's request for a
22 study and DCEO's response?

23 (No response.)

24 MR. PAULEY: All right. Seeing none, let's

1 go off the record for a moment.

2 (There was a discussion held off
3 the record, after which the
4 hearing resumed as follows:)

5 MR. PAULEY: We went off the record to
6 discuss procedural issues.

7 The post-hearing deadline for comments
8 is May 16th, 2022.

9 Copies of this transcript of today's
10 hearing are expected to be available no later than
11 Thursday, April 14th, 2022. Promptly after the
12 Board receives the transcript, it will be posted to
13 COOL, from which it can be viewed and printed.

14 Are there any other matters that need
15 to be addressed at this time? Seeing none, I would
16 like to thank everyone for participating today.
17 This second hearing is adjourned.

18
19 (Which were all the proceedings
20 taken at the hearing of the
21 above-entitled cause.)
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1 STATE OF ILLINOIS)
) SS.
2 COUNTY OF DU PAGE)
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4 I, GLORIA APOSTOLOS SIOLIDIS, C.S.R., duly
5 qualified and commissioned for the State of Illinois,
6 County of DuPage, do hereby certify that I reported
7 in shorthand the proceedings had and testimony
8 taken at the Hearing of the above-entitled cause,
9 and that the foregoing transcript is a true, correct,
10 and complete report of the entire testimony so
11 taken at the time and place hereinabove set forth.

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GLORIA APOSTOLOS SIOLIDIS
CSR License #084-001205

<hr/> A <hr/> A.M 1:16 above-entitled 1:13 12:21 13:8 Act 11:4 added 6:22 additional 7:5 address 7:20 10:8 11:2 addressed 9:7,19 12:15 addressing 5:22 6:1 adjourned 12:17 ADM 1:5,7 6:20 6:21 administered 5:12 admitted 3:20 adopts 11:7 agency 2:7 5:22 6:1,11,19 7:11 7:20 8:12,15 9:17,22 agency's 7:13 10:3 agrees 7:19 Air 1:9 3:8,8 ALEC 2:12 allow 6:7 Amendments 1:5 3:5 analysis 9:20 Anand 2:6 3:14 Anastasia 2:5 3:13 answer 5:16,17 6:5,7 8:9 answering 8:5 anybody 4:22,23 5:5 10:12,17,18 10:23 APOSTOLOS 1:16 13:4,15 APPEARANCES 2:1	application 8:21 applied 8:16 appropriate 8:23 April 1:2,15 4:20 12:11 areas 8:12 9:9 attainment 6:24 8:12 attended 3:22 Attorney 4:17 August 4:8 available 11:11 12:10 avoid 4:4 10:4	changes 8:19,24 9:1,21 10:6 check 10:23 Chicago 4:12 5:3 clarification 8:16 9:23 10:4,9 clarifies 9:17 clarify 6:11 9:5 10:1 clear 3:23 4:6 clearly 4:4 Code 1:5,7 6:20 6:21 COLIN 2:13 comment 4:23,24 8:18 10:24 comments 4:16,19 5:18,23 6:2 7:4 7:6,11,21 8:3 9:5 10:10 12:7 Commerce 11:5 commissioned 1:18 13:5 complete 3:23 13:10 conduct 11:6,15 11:19 conducting 11:11 conference 4:13 confusion 10:4 consistency 8:20 consistent 8:17 Construction 1:6 3:6 Contaminants 1:9 3:8 contemporaneous 9:20 Control 1:1,14 3:2 COOL 12:13 Copies 12:9 correct 9:5 13:9 County 13:2,6 court 4:3 5:9 CSR 1:17 13:16	Currie 11:14	<hr/> D <hr/> D 6:18 Daniel 2:3 3:3 dated 4:20 11:13 DAVIS 2:12 day 1:15 days 11:12 DCEO 11:6,15,18 DCEO's 11:22 deadline 12:7 decision 3:24 4:1 declining 11:18 decreases 9:17 defers 8:2 definition 6:10,15 7:7,12 definitions 6:13 demonstrating 6:24 Department 11:5 department's 11:10 descriptions 7:16 Deterioration 1:8 3:7 determination 9:15 determine 8:21 develop 3:23 differ 7:15 discuss 12:6 discussion 7:2 9:3 12:2 docket 3:10 document 7:16 DRIVER 2:14 DU 13:2 duly 1:17 5:11 13:4 DuPage 13:6	either 11:1,9 else's 5:5 emissions 6:10,16 7:3,12 8:10,22 9:7,16,18,18,21 emphasis 6:22 entire 13:10 entitled 3:5 Environment 4:8 11:3 ENVIRONME... 2:7,11 EPA 6:14 8:2 EPA's 7:4 8:17 9:3,4 10:8,10 expected 12:10 explanation 6:13 7:6 11:10 explanations 7:15	<hr/> F <hr/> February 4:12 file 5:18 filed 4:9 5:15 filings 10:19,20 fine 5:8 first 4:16 5:21 8:7 10:19 Flynn 11:14 follow-up 7:9,10 10:13 follows 6:17 12:4 foregoing 13:9 forth 13:11 four 4:16 further 6:24 7:6 8:15	<hr/> G <hr/> General's 4:17 give 4:24 8:8 10:24 GLORIA 1:16 13:4,15 go 5:5,14 9:10 12:1
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