

STATE OF ILLINOIS  
POLLUTION CONTROL BOARD

IN THE MATTER OF: )  
)  
) HEARING NO.  
)  
THE AMENDMENTS TO 35 ILL. ) R23-18(A)  
)  
ADM. CODE ) 201,202, AND 212 )

Report of proceedings before HEARING OFFICER CHLOE  
SALK, Illinois Pollution Control Board, at  
Michael A. Bilandic Building 160 North LaSalle Street,  
Room N505, Chicago, Illinois, commencing at the hour of  
9:00 a.m. on the 1st day of November, 2023, upon the  
purpose of Merit and Economic cause.

PRESENT:

MICHELLE GIBSON, Lead Board Member

TIM FOX, Board Member

ALSO PRESENT:

DEREK REESE, American Petroleum Institute

BYRON TAYLOR, East Dubuque Nitrogen Fertilizer

DAVID LORING, Rain Carbon LLC

ANDREW SAWULA, Midwest Generation & Dynergy

MELISSA BROWN, Environmental Regulatory Group

ALEC MESSINA, American Petroleum Institute

DIANE BETTERHOFFER, IEPA

\* \* \* \* \*

1           HEARING OFFICER SALK: My name is Chloe Salk,  
2   and I'm the Hearing Officer for this rulemaking  
3   proceeding entitled amendments to 35 Illinois  
4   Administrative Code 201 and 212. The Board Docket  
5   number for this rulemaking is R 23-18A. Also present  
6   today from the Board are Michelle Gibson, the lead Board  
7   member assigned to this Docket, and Tim Fox, who is in  
8   audience today. Going through our recent procedure, the  
9   Board held the first hearing in this matter on September  
10   27. While the deadline to pre-file testimony for the  
11   second hearing was October 18, no participant pre-filed  
12   testimony.

13           However, on that date, the Illinois  
14   Environmental Protection Agency, or IEPA, filed a  
15   comment requesting further information on each proposal  
16   from the participant's pre-filed questions based on any  
17   pre-filed testimony that was due by October 25, and no  
18   participant pre-filed questions.

19           On October 26, the Illinois Attorney General's  
20   Office or AG's Office, filed a motion requesting a third  
21   hearing on October 27. The Sierra club responded in  
22   support of the AG's motion.

23           And on to our housekeeping the hearing. This  
24   hearing is governed by the Board's procedural rules  
25   under Section 102.426 of those rules, all information

1 that is relevant and is not repetitious or privileged  
2 will be admitted by the hearing officer into the record.  
3 Please bear in mind that any questions posed today by  
4 the Board and its staff are intended solely to help  
5 develop a clear and complete record for the Board's  
6 decision, and those questions do not reflect any  
7 determination or judgment on the proposal, testimony, or  
8 questions.

9 For the sake of the court reporter, please  
10 speak clearly and avoid speaking at the same time as  
11 another person. So that we can help produce a clear  
12 transcript. If you are asking a question, please state  
13 your name and the organization you represent prior to  
14 any questions. Also, if talking about sections of the  
15 rules, please fill out the section letter such as  
16 620.101 D as in dog.

17 Mr. Court Reporter, please feel free to stop  
18 me or anyone else at any point if we are talking too  
19 fast, talking too softly, or if you need something  
20 repeated. As I mentioned no participant pre-filed  
21 testimony for this hearing. Therefore, we will see  
22 first if there are any witnesses who didn't pre-file  
23 testimony who wish to testify today.

24 Next, we will go on to anyone who has  
25 questions. Then we will see whether any participant

1 wishes to comment on the proposed rules. We will then  
2 discuss whether the participants are willing to comply  
3 with IEPA request for more information and set deadlines  
4 for submitting that information. We will also discuss  
5 the response deadline for the AG's motion. There will  
6 also be an opportunity for any participant to offer  
7 testimony or comment on the Board's request that the  
8 Department of Commerce and Economic Opportunity, or DCEO  
9 perform an economic impact study of the proposal.

10 Are there any questions about our order of  
11 proceeding?

12 (No verbal response.)

13 HEARING OFFICER SALK: Okay, seeing none. Is  
14 there anyone present today here who did not pre-file  
15 testimony but does wish to offer testimony?

16 MR. REESE: Yes.

17 HEARING OFFICER SALK: Would you like to come  
18 up to the front.

19 MR. REESE: Okay.

20 HEARING OFFICER SALK: Thank you. Would the  
21 court reporter please swear in the witness.

22 THE REPORTER: Please raise your right hand.  
23 (Whereupon:

24 DEREK REESE

25 Was called upon to tell the truth, and did so as follows

1    herein after being duly sworn.)

2                   HEARING OFFICER SALK:   If you could please  
3   state your name first for the record, and then you may  
4   begin.

5                   MR. REESE:   Okay.   John Derek Reese, American  
6   Petroleum Institute.   Good morning, my name is Derek  
7   Reese, this is my third appearance before the Board, so  
8   I'll save us all a bit of time by simply referencing my  
9   background that I've shared in previous testimony.

10                  Given the limited amount of time between the  
11   filing of Illinois EPA's comment and this hearing, API  
12   intends to further address Illinois EPA's comment in a  
13   post-hearing filing.   In the interim, however, I would  
14   like to briefly highlight a few key points in response  
15   to those comments before quickly turning to API's  
16   proposal in general.

17                  With regards to Illinois EPA's comment filed  
18   last week, API strongly disagrees with the agency's  
19   characterization of our pre-submittal discussions  
20   concerning what is needed for adoption and approval of  
21   an Alternative Emissions Limit or AEL.   While the agency  
22   noted certain information that it thought the Board  
23   might find relevant, the agency never stated that such  
24   information, such as modeling, was necessary for Board  
25   adoption, USEPA approval, or for the agency to move

1 forward.

2           The agency is now requesting CEMS data, that  
3 stands for Continuous Emissions Monitoring System, from  
4 each of the refineries. API will respond further to  
5 this request in its post-hearing filing, but would like  
6 to note that each of the refineries reports its FCC CO  
7 CEMS data to the Illinois EPA on a semi-annual basis in  
8 two separate reports under NSPS J and NESHAP UUU; that's  
9 the Federal standards. Illinois EPA has this data  
10 on-hand already.

11           The agency is also requesting modeling as to  
12 each of the four refineries. However, Marathon has  
13 submitted monitoring data collected at two proximate  
14 locations for a 3-year period, showing no violation of  
15 the CO NAAQS, that's national ambient air quality  
16 standards, including five FCC startup events. In fact,  
17 the highest measured concentration for the three-year  
18 period are 5 percent and 13 percent of the one-hour and  
19 eight-hour CO standards, respectively. Additionally,  
20 Illinois has never had a CO NAAQS non-attainment  
21 designation, even when the previous SSM provisions were  
22 in place, which should speak to the agency's concerns  
23 with API's proposal moving forward.

24           Finally the state publishes an annual  
25 monitoring network plan, which takes into account the

1 highest concentration of pollution in a given area as  
2 well as pollution resulting from significant sources or  
3 source categories. To our knowledge, Illinois EPA has  
4 never recommended in its annual updates, and the most  
5 recent one was September 2023, that any CO monitor be  
6 relocated nearer to one of the refineries. Given that  
7 the proposed AELs do not result in an emissions increase  
8 from allowable emissions, as defined in 35 IAC 202  
9 Revised in R2023-018. Historical monitoring by the  
10 state and by Marathon reasonably demonstrate that the  
11 proposed FCC AELs do not constitute backsliding and will  
12 not cause a violation of the NAAQS.

13           Lastly Illinois EPA's comment filed last week,  
14 was its first meaningful participation in this sub  
15 Docket rulemaking. Illinois EPA has not testified or  
16 questioned witnesses as to the AEL proposals in the  
17 initial rulemaking, nor have they testified or  
18 questioned witnesses in this sub Docket. The filing of  
19 the aforementioned comments clearly suggested Illinois  
20 EPA has thoughts about the proposal, but participants  
21 have been unable to question the agency as to its  
22 position on the AEL proposals. If a third hearing is  
23 held in this matter, API urges the Board to request that  
24 Illinois EPA provide witnesses for testimony and  
25 questioning at suh hearing.

1           It is important to note, that the R 23-18  
2   rulemaking was done via the fast track procedure with  
3   very limited stakeholder engagement prior to filing.  
4   Opportunities for substantive discussion with Illinois  
5   EPA on the AEL proposals has been limited throughout  
6   this entire process. With other SIP rulemaking already  
7   overdue, such as NOx RACT API wishes to highlight for  
8   the Board the need for increased engagement with the  
9   agency on topics that have wide-ranging and significant  
10   impacts to the regulated community.

11           Turning now to the proposal before the Board,  
12   API's proposal concerns the carbon monoxide emission  
13   standards for petroleum and petrochemical processes in  
14   Section 216.361. This provision, especially the 200  
15   part per million limit, is unique to Illinois when  
16   compared to other states. Most states only require the  
17   use of combustion of CO for catalytic cracker during  
18   normal operations, without the addition of a numeric  
19   concentration limit. States that do have a numeric CO  
20   limit, have higher limits, and include provisions  
21   specific to transient operations.

22           For example, the South Cost Air Quality  
23   District has a 500 parts per million limitation, which  
24   also allows for specific startup duration and limits the  
25   number of annual startups from FCCUs use. The Bay Area



1 Quality District has a 400 part per million CO standard,  
2 but it also includes startup, shutdown, and curtailment  
3 exemption. Illinois' 200-part standard with no  
4 allowance for startup or hot standby, is a unique  
5 problem with respect to FCCU startup and hot standby  
6 events when compared to other states.

7 As previously testified to, it is technically  
8 infeasible for many FCCUs to achieve the conditions  
9 necessary to meet Illinois' CO standard during periods  
10 of startup and hot standby. Due to the nature of  
11 combustion, there is no control technology that can be  
12 added to achieve the CO standard during these events.  
13 In addition to the potential compliance issue, an AEL is  
14 needed to help ensure the safe operation of FCCUs used.

15 Without the adoption of an AEL, the removal of  
16 the SMB provisions has placed refineries in a position  
17 where they will unfairly and unnecessarily be faced with  
18 allegations of noncompliance during startup or hot  
19 standby in order to avoid a known process safety  
20 hazards. Illinois EPA's offer to use enforcement  
21 discretion simply not a viable option. Thank you for  
22 your time today, and I am happy to answer any questions  
23 you may have.

24 HEARING OFFICER SALK: So we will now move on  
25 to questions, does anyone have any questions?

1 (No verbal response.)

2 HEARING OFFICER SALK: Okay. All right.

3 Hearing none -- oh, yes. But.

4 MS. BETTERHOFFER: I just have one follow up--

5 HEARING OFFICER SALK: If you could come up to  
6 the front just for our court reporter, please. Yeah.  
7 Or even sit --

8 MS. BETTERHOFFER: I just have one follow up  
9 question. Can you clarify specifically what reports the  
10 refineries have submitted to the Illinois EPA that have  
11 included the CEMS data that the agency indicated in its  
12 comments filed report.

13 MR. REESE: Sure. So those are the  
14 semi-annual that we filed under SPSJA, and then you have  
15 your semiannual reports for your mac standard UUU --  
16 that's for petroleum refineries. So those are those two  
17 semi-annual reports that come in to the region and to  
18 you.

19 MS. BETTERHOFFER: Thank you.

20 MR. REESE: You're welcome.

21 HEARING OFFICER SALK: Anyone else have any  
22 questions?

23 (No verbal response.)

24 HEARING OFFICER SALK: No all right. Thank  
25 you so much. All right. Is there anyone else that

1 wanted to offer testimony today?

2 (No verbal response.)

3 HEARING OFFICER SALK: ALL right. Hearing  
4 none, we will move on to comments. Is there anyone  
5 present here today who wishes to offer a public comment?

6 (No verbal response.)

7 HEARING OFFICER SALK: Seeing none, we will  
8 then move on to discussing IEPA's request for more  
9 information from each proposal. So first, I'd like to  
10 go to each participant who filed the proposal and ask if  
11 they will be submitting information to IEPA and if so,  
12 what day could they submit that information?

13 HEARING OFFICER SALK: We'll go first to Rain  
14 Carbon.

15 MR. LORING: Would you like me to come up to  
16 the front.

17 HEARING OFFICER SALK: Oh, yeah. That'd be  
18 great. Thank you.

19 MR. LORING: David Loring, L-O-R-I-N-G. On  
20 behalf of Rain Carbon. We will be responding to  
21 Illinois EPA's comments. We are working and have been  
22 working with the agency collaboratively to work through  
23 some of the questions, modeling, and then some of the  
24 questions as well as or had asked on how many hours of  
25 operation that Rain Carbon's facilities have been

1 functioning and breakdown. It's hard to guess or to  
2 estimate exactly how much time we need. My guess is  
3 it's going to be a couple of months that we would need  
4 to work with Illinois EPA to address their questions on  
5 modeling. And then probably have additional time for  
6 Illinois EPA to review what Rain Carbon submits and then  
7 be able to sort of provide that in written form to the  
8 Board for their consideration.

9 HEARING OFFICER SALK: Okay. Do you have any  
10 date by which you have a better estimation of, like,  
11 when you could submit that or --

12 MR. LORING: Yes. One thing we've been  
13 thinking about is perhaps in a month or a few weeks from  
14 today. Maybe there would be a status hearing or status  
15 call and we can provide an update. Rain Carbon is  
16 working diligently on its end to address and respond to  
17 those modeling questions and the other questions that  
18 were raised by Illinois EPA. We expect to have some  
19 discussions with the agency between now and then. So I  
20 think a few weeks to a month from now would be  
21 appropriate for us to have a more firm date on we think  
22 we be able to have finality on the agency's comments.

23 HEARING OFFICER SALK: Okay. All right.  
24 Thank you so much. All right. We will next go to ERG.

25 MS. BROWN: Thank you very much Melissa Brown,

1 on behalf of Illinois Environmental Regulatory Group.  
 2 At this time we're still assessing obviously the  
 3 agency's comments, and, but I think for us we could  
 4 commit to providing a response to the agency's comments  
 5 within three weeks.

6 HEARING OFFICER SALK: And do you anticipate  
 7 within that providing more information that IEPA  
 8 requested or --

9 MS. BROWN: We are unsure at this point.

10 HEARING OFFICER SALK: Great. Thank you.  
 11 Next we'll turn to API.

12 MR. MESSINA: Thank you. My name is Alec  
 13 Messina, M-E-S-S-I-N-A on behalf of The American  
 14 Petroleum Institute. And we had anticipated filing a  
 15 response as well. I wanted to, certainly learn from  
 16 this hearing if there were additional information that  
 17 would come out before having a discussion. I think that  
 18 we could also meet the 3 weeks suggested by counsel for  
 19 IERG.

20 As to your question, I think that there is  
 21 some information that we can provide. There are other  
 22 items that are going to require additional discussion  
 23 with my client. We also will probably need to have a  
 24 follow up meeting with the Agency because there is some  
 25 confusion as to some of the questions. As an example,

1    there is a before the burn notion that was something  
2    that was not familiar to any of the members of The  
3    American Petroleum Institute. So I suspect we will  
4    have -- we will need to schedule a meeting with the  
5    agency quickly so we can be responsive in this  
6    proceeding.

7                   HEARING OFFICER SALK: Okay. Thank you. All  
8    right next to it turn to EDNF.

9                   MR. TAYLOR: Good morning. My name is Byron  
10   Taylor, B-Y-R-O-N Taylor. On behalf of East Dubuque  
11   Nitrogen Fertilizer. We would ask for 60 days to  
12   provide our full responses to the questions and requests  
13   posed by the agency. There are four requests, one is  
14   CEMS data; continuous emission monitoring data, that  
15   data has already been provided to the agency.

16                   The second request was for certain startup and  
17   shutdown data for the number of instances. And a good  
18   chunk of that information has already been provided.  
19   We're trying to collect the rest of it and submit it  
20   properly to the agency. And then there are two requests  
21   that we're going to have to have more discussions with  
22   the agency about.

23                   And we're perfectly happy to do that, we have  
24   had some discussions with them in the past, and we'll  
25   continue to do so. And those remaining outstanding

1 requests are for certain modeling information. And for  
2 actually conducting a particulate matter stack test.  
3 And there's certain issues that we need to discuss with  
4 them and understand. And so we think we can respond to  
5 those requests in 60 days.

6 HEARING OFFICER SALK: Okay.

7 MR. TAYLOR: And there was one other  
8 suggestion that the agency had, it wasn't a request for  
9 data. But it was -- we had proposed to reduce our  
10 allowable emission rate in half, and the agency  
11 suggested that we might be able to reduce it even  
12 further. Based on the data that they already have and  
13 we've responded to that suggestion that in our written  
14 comments that were filed, I think on the 26 of October.

15 HEARING OFFICER SALK: Okay. Thank you so  
16 much.

17 MR. TAYLOR: Thank you.

18 HEARING OFFICER SALK: All right. And lastly,  
19 we'll turn to Midwest Generation and Dynergy.

20 MR. SAWULA: Good morning. Andrew Sawula,  
21 S-A-W-U-L-A. From ArentFox Schiff on behalf of Midwest  
22 Generation and the Dynergy entities. And I think  
23 similar to Rain Carbon, we are still assessing the  
24 questions we have been working collaboratively with  
25 Illinois EPA. And we will be responding with at least

1 some additional information in response to those  
2 questions. I think that some of that information may be  
3 assembled relatively soon, other information might take  
4 longer.

5 And I believe that within 3 or 4 weeks we  
6 would be in a much better position to know whether we've  
7 already responded to everything that we need to or how  
8 much time we believe we may need for an additional  
9 response. So if the Board held a status call in about a  
10 month, I think we'd be in a better position hopefully we  
11 would have a better sense of what our answers look like.

12 HEARING OFFICER SALK: All right. Thank you  
13 so much. Okay. Well, it looks like based off of  
14 responses, perhaps we can set a deadline from a month  
15 from now. For at least initial responses if that sounds  
16 okay to everyone. And after we discuss some further  
17 things maybe we can discuss setting up the status  
18 conference after the Board has ruled on some other  
19 things as well. But I think it's a little premature for  
20 that. So I would say let's have Friday December 1, as a  
21 deadline for initial responses to IEPA's comments.

22 And if, you know, people need additional time  
23 for additional responses, that's fine. And we can  
24 discuss that as well later. All right. So then we will  
25 move on to discuss the AG's motion for the Board to hold



1 a third hearing. So the AG filed the motion on October  
2 26 so the 14 day deadline for responses is Thursday  
3 November 9, does that work for everyone or do people  
4 need more time to respond to that motion?

5 (No verbal response.)

6 HEARING OFFICER SALK: I'm not hearing any  
7 objection to the November 9, deadline, so we'll keep  
8 that. All right. So then we'll move onto the economic  
9 impact study, section 27B, as in boy of the  
10 Environmental Protection Act, provides that the Board  
11 must request that DCEO conduct an economic impact study  
12 of proposed rules before the Board adopts them.

13 The Board must then make either the study or  
14 the department's explanation for not conducting one  
15 available to the public at least 20 days before public  
16 hearing. In a letter dated August 17, the Board's  
17 chair, Barbara Flynn Curry requested that DCEO conduct  
18 an economic impact study of this rule making proposal.

19 The Board specifically requested a response no  
20 later than October 2, and the Board did not receive a  
21 response to this request from DCEO. Is there anyone  
22 present today who would like to testify regarding the  
23 board's request for a study and DCEO's response?

24 (No verbal response.)

25 HEARING OFFICER SALK: Okay. Seeing none, let

1 me again quickly determine whether there is anyone  
2 present who wants to testify or comment today.

3 (No audible response.)

4 HEARING OFFICER SALK: Okay. Seeing none, Mr.  
5 court reporter, I wanted to check with you to see when  
6 you expect to have the transcript ready if perhaps  
7 Wednesday November 8, would work, or if you need  
8 additional time.

9 THE REPORTER: Wednesday November 8, is fine.

10 HEARING OFFICER SALK: Okay. All right. So  
11 we will have copies of the transcript available at the  
12 Board by Wednesday, November 8. Once it is filed with  
13 the Board, the transcript will be posted promptly to the  
14 Board's website under this Docket number R23-18a. And  
15 then the Board will also rule on the motion for a third  
16 hearing after the response deadline has run. Are there  
17 any other matters that need to be addressed at this  
18 time.

19 MS. BETTERHOFFER: Diane Betterhoffer with  
20 Illinois EPA, Betterhoffer; B-E-T-T-E-R-H-O-F-F-E-R. I  
21 actually just had a quick clarification. You had  
22 indicated that it's a little premature to talk about  
23 dates for maybe and status call. How do you intend to  
24 notify all the participants of when the status call will  
25 be, will there be a hearing officer order?

1 HEARING OFFICER SALK: Yes, I definitely  
2 anticipate a hearing officer order for that, yes.

3 MS. BETTERHOFFER: Thank you.

4 HEARING OFFICER SALK: Are there any other  
5 questions?

6 (No verbal response.)

7 HEARING OFFICER SALK: Anything else? All  
8 right. Neither seeing or hearing any, thank you to  
9 everyone for participating the second hearing is  
10 adjourned.

11 (Which were all the proceedings had in  
12 the above-entitled cause on this date.)

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1 STATE OF ILLINOIS.)

) SS:

2 COUNTY OF COOK )

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4 I, Michael Marciniak, CER, Notary Public,  
5 electronic reporter doing business in the State of  
6 Illinois; reported the proceedings that were held on the  
7 date, time and place set out on the title page hereof;  
8 and that the foregoing is a true and correct transcript  
9 of report of proceedings so taken aforesaid.

10 I further certify that I am not related to any  
11 of the parties, and I have no financial interest in the  
12 outcome of this matter.

13

14

*Michael Marciniak*

15

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16

MICHAEL R. MARCINIAK.

17

Certified Electronic Reporter, CER-2316

18

Notary Public

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