

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF: )  
 )  
AMENDMENTS TO 35 ILL. ADM. CODE ) R18-22  
PART 205, EMISSIONS REDUCTION ) (Rulemaking-Air)  
MARKET SYSTEM )

**NOTICE**

To: Tim Fox  
Hearing Officer  
Illinois Pollution Control Board  
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PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S RESPONSE TO THE ILLINOIS POLLUTION CONTROL BOARD AND THE ILLINOIS ENVIRONMENTAL REGULATORY GROUP'S QUESTIONS REGARDING THE SUNSET OF THE EMISSIONS REDUCTION MARKET SYSTEM, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/ Annet Godiksen  
Annet Godiksen  
Assistant Counsel  
Division of Legal Counsel

DATED: May 17, 2018  
1021 N. Grand Ave. East  
P.O. Box 19276  
Springfield, IL 62794-9276  
(217) 782-5544

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

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**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S RESPONSE TO THE ILLINOIS POLLUTION CONTROL BOARD AND THE ILLINOIS ENVIRONMENTAL REGULATORY GROUP'S QUESTIONS REGARDING THE SUNSET OF THE EMISSIONS REDUCTION MARKET SYSTEM**

The Illinois Environmental Protection Agency ("Agency" or "Illinois EPA") submits this response for the above-titled matter to the Illinois Pollution Control Board ("Board"). In the Board's pre-filed questions and during the hearing held on May 10, 2018, the Board and the representative for the Illinois Environmental Regulatory Group ("IERG") requested that the Agency respond regarding specific aspects of the Agency's proposal to sunset the Emissions Reduction Market System ("ERMS"). The Illinois EPA responds as follows:

1. The Board asked the Illinois EPA to provide a summary of annual Allotment Trading Unit ("ATU") transactions for the last five years (2012-2017), including the cost of ATUs (average and range), and the names of sources selling and purchasing the ATUs. [Board's Pre-filed Questions of May 8, 2018].

In Attachment 1, the Illinois EPA submits the requested data and a description of the table.

2. The Board asked whether the Agency was aware of any pending enforcement cases under ERMS. [page 12 of the hearing transcript]

The Agency has confirmed internally that there are no pending enforcement cases.

3. IERG's representative asked several questions about how changes to the permits of applicable sources would be handled.

During the first hearing regarding the ERMS sunset rulemaking, held May 10, 2018, IERG asked the Agency several questions about how changes to the permits of applicable sources would be handled for the 2018 season and the time gap between when the State program sunsets and the Illinois SIP is revised. The Agency has confirmed internally that the responses given at the hearing were indeed correct, but the Agency would like to expand upon them.

Any source with a CAAPP permit that is concerned about having ERMS requirements in that permit can submit an application for Minor Modification to the Illinois EPA Bureau of Air Permit Section after the USEPA approves the change in Illinois' SIP. Similarly, any applicable source with a FESOP can apply to have ERMS requirements removed from its permit at that same point.

If the Agency's proposal is adopted by the Board, the ERMS requirements will no longer be effective at the State level; however, they will technically continue to be federally enforceable until the USEPA approves the sunset as a revision to the Illinois SIP. As stated at the hearing, it is extremely unlikely that the USEPA would attempt to enforce requirements under a program that the State of Illinois no longer operates and that the State is attempting to remove from its SIP. The USEPA understands that the gap of time between finalizing rulemakings at the State level and approving SIP revisions at the federal level is a part of the SIP revision process.

Additionally, once the ERMS sunset provision is adopted by the Board, applicable sources submitting CAAPP annual certifications can explain in those certifications that the ERMS requirements are no longer applicable, and thus certify compliance with any ERMS requirements.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/ Annet Godiksen  
Annet Godiksen  
Assistant Counsel  
Division of Legal Counsel

DATED: May 17, 2018

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## **Attachment 1**

### **Description of ERMS Trades 2012 – 2017 and ATU Trades Table**

This document and data are in response to the Board's pre-filed Question #7 which requested that the Agency, "... provide a summary of annual ATU transactions for the last five years (2012-2017), including the cost of ATUs (average and range), and the names of sources selling and purchasing the ATUs." This summary provides background and detail into the data provided.

#### Data included

The data included in the report includes trades of ATUs between companies where the two parties have come together in the marketplace to enact the trade. It does not include the ancillary operations of the ERMS program such as allotting ATUs, expiring ATUs, and retiring ATUs. Furthermore, trades made to Special Participants and trades made to/from the Alternative Compliance Market Account ("ACMA") for compliance reasons are not included. The list is intended to present market-type transactions.

#### Trading Year

This is the calendar year in which the trade took place. Sources can trade anytime throughout the year, but the most common trading period is late November through December. A transfer (discussed below) is typically performed when the annual allotment is performed – typically in April.

#### Trade Types

There is only a slight difference between a transfer and a trade. A trade is a one-time transfer of ATUs between parties. A transfer, known as a transfer agreement, is a case where the two parties have agreed to perform the same transaction annually for at least two years. In doing so, the parties only have to submit paperwork for the transaction once. Their submittal will indicate the length of the agreement. Based on that information, the system will automatically perform the specified trade annually until the end of the agreement.

#### Seller Name and Buyer Name

The seller name (or buyer name) is the name of the company selling (or buying) the ATUs as it existed in the system as of May 2018. Company names may have changed since the trade was performed. Likewise, it is possible that some companies had different names in earlier years when trades were actually made, but the more current name is reflected in these tables.

#### Seller Type and Buyer Type

The specific descriptions of the seller and buyer types can be found in the previously submitted TSD and also the ERMS rule. Here is a brief description:

- Participating – sources that are required to be in ERMS, which receive an annual allotment, and which can buy and sell ATUs.
- New Participating – sources that are required to be in ERMS that can buy and sell ATUs but do not receive an annual allotment. Most of these are new companies that began operation after the ERMS rule was established.
- General Participants – sources that were participating sources but that have shut down and become general participants. Additionally, parties unregulated by ERMS (e.g., consultants, environmental groups, the public, etc.) can register for a general participant account and have the ability to buy and sell ATUs.

The seller or buyer type indication identifies the category of the source as it existed in the system as of May 2018. The type may have changed since the original trade was performed. The most common change would be from Participating to General Participant. A source will not go from Participating to New Participating source or vice versa. A General Participant will not change to any other type.

Of particular note, when a Participant or New Participating source is buying ATUs, it is often because the buyer needs to cover its emissions. Trading from a General Participant to another General Participant is typically not a trade related to the market or needing ATUs to cover emissions.

#### ATUs Traded and \$/ATU

The ATUs traded column is simply the number of ATUs traded in that transaction. The dollar amount is the total dollar amount of the trade reported by the parties divided by the number of ATUs traded. Documentation for the trade also allows for an indication of whether “additional considerations” (discussed below) other than price were involved in the trade.

#### Trade Excluded from Average

This information identifies whether the trade was excluded from the calculation of average price.

The Bureau is required to periodically report average ATU prices on its web site. However, as mentioned above, the two parties may have had “additional considerations” in agreeing to a trade between them. The parties are not required to divulge the additional considerations involved in the trade, so the Bureau certainly does not know any costs related to such considerations. The additional consideration may also be something as simple as the two parties being run by the same company and thus not exchanging money. As examples, see Meyer Steel Drum Inc. selling to Meyer Industrial Container or One University of Illinois-Chicago site selling to another University of Illinois-Chicago site. For cases such as these, there is very little incentive to transfer money within the same company, so typically these trades have no purchase price, and as such the Illinois EPA would not include such trades as part of the average.

A multi-year transfer agreement also presents issues for calculating an average price. The actual transfer itself is a known quantity of ATUs for a known dollar amount, but there is no way to average the length of the transfer agreement in cases where the agreement has no end date.

In the operation of ERMS, trades such as transfer agreements, trades between the same company, and trades with additional considerations identified are not included in calculating the average price of an ATU. The Bureau's average price is the best attempt to establish a price based purely on market forces.

Range

This is the range of \$/ATU amounts from the trades used in the calculation of the average for that given calendar year.

Average

This is the total price paid divided by the total number of ATUs traded for the trades used in the calculation of the average for that given calendar year. It is not the average of each trade performed. For example, if there were two trades – 100 ATUs at \$20/ATU and 50 ATUs at \$10/ATU – the average price will not be \$15/ATU (average of \$20 and \$10). Rather, the average ATU price is \$16.67/ATU (\$2500/150 ATUs).

Note that the average price per ATU was obtained from Annual Performance Review Reports and may not match an average calculated from the presented data. The reason for this is each Annual Performance Review Report had a cut-off date after which no transactions were included in the report, but those transactions may show up on the table. Values should not deviate significantly.

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**CERTIFICATE OF SERVICE**

I, the undersigned, an attorney, state that I have served the attached ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S RESPONSE TO THE ILLINOIS POLLUTION CONTROL BOARD AND THE ILLINOIS ENVIRONMENTAL REGULATORY GROUP'S QUESTIONS REGARDING THE SUNSET OF THE EMISSIONS REDUCTION MARKET SYSTEM upon the person to whom it is directed, by the following means:

By emailing the testimony, numbering 19 pages, from [annet.godiksen@illinois.gov](mailto:annet.godiksen@illinois.gov), on May 17, 2018, by 6:00 PM to the following persons:

To: Tim Fox  
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Illinois Pollution Control Board  
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ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/ Annet Godiksen  
Annet Godiksen  
Assistant Counsel  
Division of Legal Counsel

DATED: May 17, 2018

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Electronic Filing: Received Clerk's Office 5/17/2018

Trading Year	Trade Type	Seller	Seller Type	Buyer	Buyer Type	ATUs Traded	\$/ATU	Trade Excluded from Average
2012	TRANSFER	Acme Packaging	GENERAL	Signode-Bridgeview	PARTICIPATING	468	0	Yes
2012	TRANSFER	Acme Steel Co	GENERAL	Acme Packaging, A Div. of Tool Works Inc.	GENERAL	221	0	Yes
2012	TRANSFER	American NTN Bearing Mfg Corp	PARTICIPATING	S & C Electric Co	PARTICIPATING	30	1100	Yes
2012	TRANSFER	AMPAC Flex LLC	PARTICIPATING	Dart Container Corp of Illinois	PARTICIPATING	200	1000	Yes
2012	TRANSFER	Berlin Industries	GENERAL	American Litho Inc	PARTICIPATING	80	100	Yes
2012	TRANSFER	Bluegrass Labels Co LLC	GENERAL	Captive Plastics LLC	PARTICIPATING	242	0	Yes
2012	TRANSFER	Brown Printing Co	GENERAL	Brown Printing Co	GENERAL	88	1	Yes
2012	TRANSFER	Marathon Ashland Petroleum LLC	GENERAL	MPLX Terminals LLC	PARTICIPATING	177	0	Yes
2012	TRANSFER	Meyer Steel Drum Inc	PARTICIPATING	Meyer Industrial Container	PARTICIPATING	100	0	Yes
2012	TRANSFER	Palex Container Systems	GENERAL	Meyer Steel Drum Inc	PARTICIPATING	431	0	Yes
2012	TRANSFER	Palex Container Systems	GENERAL	Meyer Steel Drum Inc	PARTICIPATING	431	0	Yes
2012	TRANSFER	Rexam Release	GENERAL	Loparex Inc	GENERAL	191	0	Yes
2012	TRANSFER	Rock-Tenn Co	GENERAL	Rock-Tenn Company/Waldorf Corp	GENERAL	611	0	Yes
2012	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	Dart Container Corp of Illinois	PARTICIPATING	200	180	Yes
2012	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	S & C Electric Co	PARTICIPATING	100	150	Yes
2012	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	Dart Container Corp of Illinois	PARTICIPATING	311	150	Yes
2012	TRANSFER	Silgan Closures LLC	GENERAL	Silgan Containers Corp	GENERAL	1313	0	Yes
2012	TRANSFER	Silgan Containers Corp	GENERAL	Caterpillar Inc	PARTICIPATING	100	250	Yes
2012	TRANSFER	Sleepeck Printing Co	GENERAL	Environmental Compliance Consulting Ltd	GENERAL	233	0	Yes
2012	TRANSFER	St Clair Pakwell	GENERAL	Graphic Packaging Intl Inc	PARTICIPATING	100	0	Yes
2012	TRANSFER	Triton West LLC	PARTICIPATING	Buckeye Terminals LLC	PARTICIPATING	2	0	Yes
2012	TRANSFER	Viskase Corp	GENERAL	Brown Printing Co	GENERAL	70	60	Yes
2012	TRANSFER	Viskase Corp	GENERAL	Prairie State Group	NEW	100	63	Yes
2012	TRANSFER	Viskase Corp	GENERAL	Air Products & Chemicals Inc	PARTICIPATING	230	63	Yes
2012	TRANSFER	Zenith Electronics	GENERAL	Law Office of Katherine W. Delahunt	GENERAL	302	0	Yes
2012	TRADE	Alpha Baking Co	PARTICIPATING	Alpha Baking Co Inc	PARTICIPATING	28	0	Yes
2012	TRADE	Continental Web Press Inc	PARTICIPATING	Segerdahl Corp	PARTICIPATING	39	20	Yes
2012	TRADE	Environmental Compliance Consulting Ltd	GENERAL	Acme Finishing Co LLC	PARTICIPATING	11	20	Yes
2012	TRADE	FCL Graphics Inc	PARTICIPATING	Multifilm Packaging Corp	PARTICIPATING	102	19	
2012	TRADE	Fleischmann's Vinegar Co Inc	PARTICIPATING	Highland Baking Co	NEW	205	19.8	
2012	TRADE	Free-flow Packaging International	PARTICIPATING	Fort Dearborn Lithographic Co	PARTICIPATING	19	20	
2012	TRADE	Greif Industrial Packaging & Services LLC	PARTICIPATING	Greif Packaging Inc LLC	PARTICIPATING	26	0	Yes
2012	TRADE	Ingredion Incorporated Argo Plant	PARTICIPATING	ExxonMobil Oil Corp	PARTICIPATING	16	30	
2012	TRADE	Pactiv Corporation	GENERAL	Pactiv LLC	NEW	346	0	Yes
2012	TRADE	Reichhold LLC 2	PARTICIPATING	HB Fuller	GENERAL	5	0	Yes
2012	TRADE	Reichhold LLC 2	PARTICIPATING	HB Fuller	GENERAL	5	0	Yes
2012	TRADE	Senior Flexonics	PARTICIPATING	Lake Book Mfg	PARTICIPATING	78	20	
2012	TRADE	Senior Flexonics	PARTICIPATING	Chicago Steel Container Corp	PARTICIPATING	6	20	
2012	TRADE	Stickney Water Reclamation Plant	PARTICIPATING	Metropolitan Biosolids Management	PARTICIPATING	5	0	Yes
2012	TRADE	Triton West LLC	PARTICIPATING	Shell Pipeline Co LP	PARTICIPATING	23	0	Yes
2012	TRADE	University of Illinois Chicago	PARTICIPATING	University of Illinois - Chicago	PARTICIPATING	28	0	Yes
2012	TRADE	Viskase Corp	GENERAL	Kerry Ingredients Inc	PARTICIPATING	178	20	
2012	TRADE	Viskase Corp	GENERAL	New WinCup Holdings Inc	PARTICIPATING	188	20	
2012	TRADE	Viskase Corp	GENERAL	East Balt Commissary LLC	PARTICIPATING	92	20	

Electronic Filing: Received Clerk's Office 5/17/2018

Trading Year	Trade Type	Seller	Seller Type	Buyer	Buyer Type	ATUs Traded	\$/ATU	Trade Excluded from Average
2012	TRADE	Viskase Corp	GENERAL	Hostess Brands LLC	PARTICIPATING	13	20	
2012	TRADE	Viskase Corp	GENERAL	Alpha Baking Co Inc	PARTICIPATING	56	18	
2012	TRADE	Viskase Corp	GENERAL	Kerry Inc d/b/a Kerry Ingredients & Flavours	PARTICIPATING	24	20	
2012	TRADE	Viskase Corp	GENERAL	Campagna-Turano Bakery Inc	PARTICIPATING	69	20	
2012	TRADE	Viskase Corp	GENERAL	Knead Dough Baking Co Inc	PARTICIPATING	110	20	
2012	TRADE	Viskase Corp	GENERAL	Brown Printing Co	GENERAL	27	20	
2012	TRADE	Viskase Corp	GENERAL	Diageo North America Inc	PARTICIPATING	27	20	
2012	TRADE	Viskase Corp	GENERAL	Interlake Mecalux Inc	NEW	66	20	

Range: \$18 - \$20 / ATU

Average: \$19.93 / ATU

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Trading Year	Trade Type	Seller	Seller Type	Buyer	Buyer Type	ATUs Traded	\$/ATU	Trade Excluded from Average
2013	TRANSFER	Acme Packaging	GENERAL	Signode-Bridgeview	PARTICIPATING	468	0	Yes
2013	TRANSFER	Acme Steel Co	GENERAL	Acme Packaging	GENERAL	221	0	Yes
2013	TRANSFER	American NTN Bearing Mfg Corp	PARTICIPATING	S & C Electric Co	PARTICIPATING	30	1100	Yes
2013	TRANSFER	AMPAC Flex LLC	PARTICIPATING	Dart Container Corp of Illinois	PARTICIPATING	200	1000	Yes
2013	TRANSFER	Berlin Industries	GENERAL	American Litho Inc	PARTICIPATING	80	100	Yes
2013	TRANSFER	Bluegrass Labels Co LLC	GENERAL	Captive Plastics LLC	PARTICIPATING	242	0	Yes
2013	TRANSFER	Brown Printing Co	GENERAL	Brown Printing Co	GENERAL	88	1	Yes
2013	TRANSFER	BWay Packaging	GENERAL	BWAY Corp	PARTICIPATING	398	0	Yes
2013	TRANSFER	Marathon Ashland Petroleum LLC	GENERAL	MPLX Terminals LLC	PARTICIPATING	177	0	Yes
2013	TRANSFER	Meyer Steel Drum Inc	PARTICIPATING	Meyer Industrial Container	PARTICIPATING	100	0	Yes
2013	TRANSFER	Palex Container Systems	GENERAL	Meyer Steel Drum Inc	PARTICIPATING	431	0	Yes
2013	TRANSFER	Palex Container Systems	GENERAL	Meyer Steel Drum Inc	PARTICIPATING	431	0	Yes
2013	TRANSFER	Rexam Release	GENERAL	Loparex Inc	GENERAL	191	0	Yes
2013	TRANSFER	Rock-Tenn Co	GENERAL	Rock-Tenn Company/Waldorf Corp	GENERAL	611	0	Yes
2013	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	Dart Container Corp of Illinois	PARTICIPATING	311	150	Yes
2013	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	Dart Container Corp of Illinois	PARTICIPATING	200	180	Yes
2013	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	S & C Electric Co	PARTICIPATING	100	150	Yes
2013	TRANSFER	Silgan Closures LLC	GENERAL	Silgan Containers Corp	GENERAL	1313	0	Yes
2013	TRANSFER	Silgan Containers Corp	GENERAL	Caterpillar Inc	PARTICIPATING	100	250	Yes
2013	TRANSFER	Sleepeck Printing Co	GENERAL	Environmental Compliance Consulting Ltd	GENERAL	233	0	Yes
2013	TRANSFER	St Clair Pakwell	GENERAL	Graphic Packaging Intl Inc	PARTICIPATING	100	0	Yes
2013	TRANSFER	Triton West LLC	PARTICIPATING	Buckeye Terminals LLC	PARTICIPATING	2	0	Yes
2013	TRANSFER	Viskase Corp	GENERAL	Air Products & Chemicals Inc	PARTICIPATING	230	63	Yes
2013	TRANSFER	Viskase Corp	GENERAL	Prairie State Group	NEW	100	63	Yes
2013	TRANSFER	Viskase Corp	GENERAL	Brown Printing Co	GENERAL	70	60	Yes
2013	TRANSFER	Zenith Electronics	GENERAL	Law Office of Katherine W. Delahunt	GENERAL	302	0	Yes
2013	TRADE	Abbott Laboratories	PARTICIPATING	AbbVie Inc	PARTICIPATING	330	0	Yes
2013	TRADE	Alpha Baking Co	PARTICIPATING	Alpha Baking Co Inc	PARTICIPATING	15	0	Yes
2013	TRADE	Arlington Plating Co	PARTICIPATING	Lake Book Mfg	PARTICIPATING	30	20	
2013	TRADE	Bagcraft Packaging LLC	PARTICIPATING	General Packaging Products Inc	PARTICIPATING	15	0	Yes
2013	TRADE	Continental Web Press Inc	PARTICIPATING	Segerdahl Corp	PARTICIPATING	13	20	Yes
2013	TRADE	Environmental Compliance Consulting Ltd	GENERAL	Acme Finishing Co LLC	PARTICIPATING	18	15	Yes
2013	TRADE	ExxonMobil Oil Corp	PARTICIPATING	ExxonMobil Oil Corp	PARTICIPATING	39	0	Yes
2013	TRADE	Fleischmann's Vinegar Co Inc	PARTICIPATING	Highland Baking Co	NEW	190	20	
2013	TRADE	Greif Industrial Packaging & Services LLC	PARTICIPATING	Greif Packaging Inc LLC	PARTICIPATING	6	0	Yes
2013	TRADE	Pactiv Corporation	GENERAL	Pactiv LLC	NEW	347	0	Yes
2013	TRADE	Senior Flexonics	PARTICIPATING	Chicago Steel Container Corp	PARTICIPATING	52	20	
2013	TRADE	Triton West LLC	PARTICIPATING	Shell Pipeline Co LP	PARTICIPATING	3	0	Yes
2013	TRADE	University of Illinois Chicago	PARTICIPATING	University of Illinois at Chicago	PARTICIPATING	1	0	Yes
2013	TRADE	University of Illinois Chicago	PARTICIPATING	University of Illinois - Chicago	PARTICIPATING	30	0	Yes
2013	TRADE	Viskase Corp	GENERAL	Knead Dough Baking Co Inc	PARTICIPATING	126	20	Yes
2013	TRADE	Viskase Corp	GENERAL	Alpha Baking Co Inc	PARTICIPATING	95	18	
2013	TRADE	Viskase Corp	GENERAL	New WinCup Holdings Inc	PARTICIPATING	308	20	
2013	TRADE	Viskase Corp	GENERAL	Aux Sable Liquid Products	NEW	125	20	

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Trading Year	Trade Type	Seller	Seller Type	Buyer	Buyer Type	ATUs Traded	\$/ATU	Trade Excluded from Average
2013	TRADE	Viskase Corp	GENERAL	Brown Printing Co	GENERAL	8	20	
2013	TRADE	Viskase Corp	GENERAL	Diageo North America Inc	PARTICIPATING	51	20	
2013	TRADE	Viskase Corp	GENERAL	East Balt Commissary LLC	PARTICIPATING	55	20	
2013	TRADE	Viskase Corp	GENERAL	Kerry Ingredients Inc	PARTICIPATING	177	20	
2013	TRADE	Viskase Corp	GENERAL	Action Athletic Equipment Inc	GENERAL	45	20	
2013	TRADE	Viskase Corp	GENERAL	Kerry Inc	PARTICIPATING	64	20	
2013	TRADE	Viskase Corp	GENERAL	Hostess Brands LLC	PARTICIPATING	46	20	
2013	TRADE	Viskase Corp	GENERAL	Campagna-Turano Bakery Inc	PARTICIPATING	77	20	

Range: \$18 - \$20 / ATU

Average: \$19.86 / ATU

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Trading Year	Trade Type	Seller	Seller Type	Buyer	Buyer Type	ATUs Traded	\$/ATU	Trade Excluded from Average
2014	TRANSFER	Acme Packaging	GENERAL	Signode-Bridgeview	PARTICIPATING	468	0	Yes
2014	TRANSFER	Acme Steel Co	GENERAL	Acme Packaging	GENERAL	221	0	Yes
2014	TRANSFER	American NTN Bearing Mfg Corp	PARTICIPATING	S & C Electric Co	PARTICIPATING	30	1100	Yes
2014	TRANSFER	AMPAC Flex LLC	PARTICIPATING	Dart Container Corp of Illinois	PARTICIPATING	200	1000	Yes
2014	TRANSFER	Berlin Industries	GENERAL	American Litho Inc	PARTICIPATING	80	100	Yes
2014	TRANSFER	Bluegrass Labels Co LLC	GENERAL	Captive Plastics LLC	PARTICIPATING	242	0	Yes
2014	TRANSFER	Brown Printing Co	GENERAL	Brown Printing Co	GENERAL	88	1	Yes
2014	TRANSFER	BWay Packaging	GENERAL	BWAY Corp	PARTICIPATING	398	0	Yes
2014	TRANSFER	Marathon Ashland Petroleum LLC	GENERAL	MPLX Terminals LLC	PARTICIPATING	177	0	Yes
2014	TRANSFER	Meyer Steel Drum Inc	PARTICIPATING	Meyer Industrial Container	PARTICIPATING	100	0	Yes
2014	TRANSFER	Palex Container Systems	GENERAL	Meyer Steel Drum Inc	PARTICIPATING	431	0	Yes
2014	TRANSFER	Palex Container Systems	GENERAL	Meyer Steel Drum Inc	PARTICIPATING	431	0	Yes
2014	TRANSFER	Rexam Release	GENERAL	Loparex Inc	GENERAL	191	0	Yes
2014	TRANSFER	Rock-Tenn Co	GENERAL	Rock-Tenn Company/Waldorf Corp	GENERAL	611	0	Yes
2014	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	S & C Electric Co	PARTICIPATING	100	150	Yes
2014	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	Dart Container Corp of Illinois	PARTICIPATING	200	180	Yes
2014	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	Dart Container Corp of Illinois	PARTICIPATING	311	150	Yes
2014	TRANSFER	Silgan Closures LLC	GENERAL	Silgan Containers Corp	GENERAL	1313	0	Yes
2014	TRANSFER	Silgan Containers Corp	GENERAL	Caterpillar Inc	PARTICIPATING	100	250	Yes
2014	TRANSFER	Sleepeck Printing Co	GENERAL	Environmental Compliance Consulting Ltd	GENERAL	233	0	Yes
2014	TRANSFER	St Clair Pakwell	GENERAL	Graphic Packaging Intl Inc	PARTICIPATING	100	0	Yes
2014	TRANSFER	Triton West LLC	PARTICIPATING	Buckeye Terminals LLC	PARTICIPATING	2	0	Yes
2014	TRANSFER	Viskase Corp	GENERAL	Air Products & Chemicals Inc	PARTICIPATING	230	63	Yes
2014	TRANSFER	Viskase Corp	GENERAL	Brown Printing Co	GENERAL	70	60	Yes
2014	TRANSFER	Viskase Corp	GENERAL	Prairie State Group	NEW	100	63	Yes
2014	TRANSFER	Viskase Corp	GENERAL	Aux Sable Liquid Products	NEW	250	63	Yes
2014	TRANSFER	Viskase Corp	GENERAL	Prairie State Group	NEW	20	63	Yes
2014	TRANSFER	Zenith Electronics	GENERAL	Law Office of Katherine W. Delahunt	GENERAL	302	0	Yes
2014	TRADE	Abbott Laboratories	PARTICIPATING	AbbVie Inc	PARTICIPATING	165	0	Yes
2014	TRADE	Alpha Baking Co	PARTICIPATING	Alpha Baking Co Inc	PARTICIPATING	19	0	Yes
2014	TRADE	Arlington Plating Co	PARTICIPATING	Lake Book Mfg	PARTICIPATING	36	20	
2014	TRADE	Fleischmann's Vinegar Co Inc	PARTICIPATING	Highland Baking Co	NEW	159	20	
2014	TRADE	Free-flow Packaging International	PARTICIPATING	East Balt Commissary LLC	PARTICIPATING	439	20	
2014	TRADE	Free-flow Packaging International	PARTICIPATING	Fort Dearborn Lithographic Co	PARTICIPATING	9	20	
2014	TRADE	Free-flow Packaging International	PARTICIPATING	Fort Dearborn Lithographic Co	PARTICIPATING	8	20	
2014	TRADE	Ingredion Incorporated Argo Plant	PARTICIPATING	ExxonMobil Oil Corp	PARTICIPATING	13	30	
2014	TRADE	Pactiv Corporation	GENERAL	Pactiv LLC	NEW	269	0	Yes
2014	TRADE	Senior Flexonics	PARTICIPATING	Chicago Steel Container Corp	PARTICIPATING	59	20	
2014	TRADE	The Segerdahl Corp	PARTICIPATING	Segerdahl Corp	PARTICIPATING	49	20	
2014	TRADE	Triton West LLC	PARTICIPATING	Shell Pipeline Co LP	PARTICIPATING	12	0	Yes
2014	TRADE	University of Illinois Chicago	PARTICIPATING	University of Illinois - Chicago	PARTICIPATING	28	0	Yes
2014	TRADE	Viskase Corp	GENERAL	Alpha Baking Co Inc	PARTICIPATING	196	18	
2014	TRADE	Viskase Corp	GENERAL	Interlake Mecalux Inc	NEW	20	20	
2014	TRADE	Viskase Corp	GENERAL	Kerry Ingredients Inc	PARTICIPATING	75	20	

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Trading Year	Trade Type	Seller	Seller Type	Buyer	Buyer Type	ATUs Traded	\$/ATU	Trade Excluded from Average
2014	TRADE	Viskase Corp	GENERAL	Hostess Brands LLC	PARTICIPATING	32	20	
2014	TRADE	Viskase Corp	GENERAL	Kerry Inc	PARTICIPATING	68	20	
2014	TRADE	Viskase Corp	GENERAL	Diageo North America Inc	PARTICIPATING	2	20	
2014	TRADE	Viskase Corp	GENERAL	Knead Dough Baking Co Inc	PARTICIPATING	1	20	Yes
2014	TRADE	Viskase Corp	GENERAL	Campagna-Turano Bakery Inc	PARTICIPATING	89	20	Yes
2014	TRADE	Viskase Corp	GENERAL	Knead Dough Baking Co Inc	PARTICIPATING	190	20	Yes
2014	TRADE	Viskase Corp	GENERAL	Interlake Mecalux Inc	NEW	70	20	
2014	TRADE	Viskase Corp	GENERAL	New WinCup Holdings Inc	PARTICIPATING	47	20	

Range: \$18 - \$30 / ATU

Average: \$19.80 / ATU

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Trading Year	Trade Type	Seller	Seller Type	Buyer	Buyer Type	ATUs Traded	\$/ATU	Trade Excluded from Average
2015	TRANSFER	Acme Packaging	GENERAL	Signode-Bridgeview	PARTICIPATING	468	0	Yes
2015	TRANSFER	Acme Steel Co	GENERAL	Acme Packaging	GENERAL	221	0	Yes
2015	TRANSFER	American NTN Bearing Mfg Corp	PARTICIPATING	S & C Electric Co	PARTICIPATING	30	1100	Yes
2015	TRANSFER	AMPAC Flex LLC	PARTICIPATING	Dart Container Corp of Illinois	PARTICIPATING	200	1000	Yes
2015	TRANSFER	Berlin Industries	GENERAL	American Litho Inc	PARTICIPATING	80	100	Yes
2015	TRANSFER	Bluegrass Labels Co LLC	GENERAL	Captive Plastics LLC	PARTICIPATING	242	0	Yes
2015	TRANSFER	Brown Printing Co	GENERAL	Brown Printing Co	GENERAL	88	0	Yes
2015	TRANSFER	Brown Printing Co	GENERAL	Brown Printing Co	GENERAL	162	0	Yes
2015	TRANSFER	BWay Packaging	GENERAL	BWAY Corp	PARTICIPATING	398	0	Yes
2015	TRANSFER	Marathon Ashland Petroleum LLC	GENERAL	MPLX Terminals LLC	PARTICIPATING	177	0	Yes
2015	TRANSFER	Meyer Steel Drum Inc	PARTICIPATING	Meyer Industrial Container	PARTICIPATING	100	0	Yes
2015	TRANSFER	Palex Container Systems	GENERAL	Meyer Steel Drum Inc	PARTICIPATING	431	0	Yes
2015	TRANSFER	Palex Container Systems	GENERAL	Meyer Steel Drum Inc	PARTICIPATING	431	0	Yes
2015	TRANSFER	Rexam Release	GENERAL	Loparex Inc	GENERAL	191	0	Yes
2015	TRANSFER	Rock-Tenn Co	GENERAL	Rock-Tenn Company/Waldorf Corp	GENERAL	611	0	Yes
2015	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	Dart Container Corp of Illinois	PARTICIPATING	311	150	Yes
2015	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	Dart Container Corp of Illinois	PARTICIPATING	200	180	Yes
2015	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	S & C Electric Co	PARTICIPATING	100	150	Yes
2015	TRANSFER	Silgan Closures LLC	GENERAL	Silgan Containers Corp	GENERAL	1313	0	Yes
2015	TRANSFER	Silgan Containers Corp	GENERAL	Caterpillar Inc	PARTICIPATING	100	250	Yes
2015	TRANSFER	Sleepeck Printing Co	GENERAL	Environmental Compliance Consulting Ltd	GENERAL	233	0	Yes
2015	TRANSFER	St Clair Pakwell	GENERAL	Graphic Packaging Intl Inc	PARTICIPATING	100	0	Yes
2015	TRANSFER	Triton West LLC	PARTICIPATING	Buckeye Terminals LLC	PARTICIPATING	2	0	Yes
2015	TRANSFER	Viskase Corp	GENERAL	Air Products & Chemicals Inc	PARTICIPATING	230	63	Yes
2015	TRANSFER	Viskase Corp	GENERAL	Prairie State Group	NEW	20	63	Yes
2015	TRANSFER	Viskase Corp	GENERAL	Aux Sable Liquid Products	NEW	250	63	Yes
2015	TRANSFER	Viskase Corp	GENERAL	Prairie State Group	NEW	100	63	Yes
2015	TRANSFER	Viskase Corp	GENERAL	Brown Printing Co	GENERAL	70	60	Yes
2015	TRANSFER	Viskase Corp	GENERAL	KNS Companies Inc	PARTICIPATING	250	65	Yes
2015	TRANSFER	Zenith Electronics	GENERAL	Law Office of Katherine W. Delahunt	GENERAL	302	0	Yes
2015	TRADE	Abbott Laboratories	PARTICIPATING	AbbVie Inc	PARTICIPATING	165	0	Yes
2015	TRADE	Chicago Baking Co	GENERAL	Gold Standard Bakery	PARTICIPATING	252	20	
2015	TRADE	Fleischmann's Vinegar Co Inc	PARTICIPATING	Highland Baking Co	NEW	167	20	
2015	TRADE	GM Cereals Properties Inc	PARTICIPATING	Fort Dearborn Lithographic Co	PARTICIPATING	2	20	
2015	TRADE	Greif Industrial Packaging & Services LLC	PARTICIPATING	Greif Packaging Inc LLC	PARTICIPATING	4	0	Yes
2015	TRADE	Greif Industrial Packaging & Services LLC	PARTICIPATING	Greif Packaging Inc LLC	PARTICIPATING	5	0	Yes
2015	TRADE	Meyer Steel Drum Inc	PARTICIPATING	Georgia Nut Co	PARTICIPATING	100	15	
2015	TRADE	Pactiv Corporation	GENERAL	Pactiv LLC	NEW	253	0	Yes
2015	TRADE	Senior Flexonics	PARTICIPATING	Lake Book Mfg	PARTICIPATING	36	20	
2015	TRADE	Senior Flexonics	PARTICIPATING	Chicago Steel Container Corp	PARTICIPATING	82	15	
2015	TRADE	The Segerdahl Corp	PARTICIPATING	Segerdahl Corp	PARTICIPATING	37	20	
2015	TRADE	Triton West LLC	PARTICIPATING	Shell Pipeline Co LP	PARTICIPATING	34	0	Yes
2015	TRADE	University of Illinois Chicago	PARTICIPATING	University of Illinois - Chicago	PARTICIPATING	36	0	Yes
2015	TRADE	Viskase Corp	GENERAL	Alpha Baking Co	PARTICIPATING	25	18	

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Trading Year	Trade Type	Seller	Seller Type	Buyer	Buyer Type	ATUs Traded	\$/ATU	Trade Excluded from Average
2015	TRADE	Viskase Corp	GENERAL	Knead Dough Baking Co Inc	PARTICIPATING	184	20	
2015	TRADE	Viskase Corp	GENERAL	Campagna-Turano Bakery Inc	PARTICIPATING	97	20	
2015	TRADE	Viskase Corp	GENERAL	Interlake Mecalux Inc	NEW	60	20	
2015	TRADE	Viskase Corp	GENERAL	New WinCup Holdings Inc	PARTICIPATING	192	20	
2015	TRADE	Viskase Corp	GENERAL	Alpha Baking Co Inc	PARTICIPATING	216	18	
2015	TRADE	Viskase Corp	GENERAL	Kerry Ingredients Inc	PARTICIPATING	138	20	
2015	TRADE	Viskase Corp	GENERAL	Kerry Inc	PARTICIPATING	69	20	
2015	TRADE	Viskase Corp	GENERAL	Diageo North America Inc	PARTICIPATING	13	20	
2015	TRADE	Viskase Corp	GENERAL	East Balt Commissary LLC	PARTICIPATING	354	20	

Range: \$15 - \$20 / ATU

Average: \$19.31 / ATU

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Trading Year	Trade Type	Seller	Seller Type	Buyer	Buyer Type	ATUs Traded	\$/ATU	Trade Excluded from Average
2016	TRANSFER	Acme Packaging	GENERAL	Signode-Bridgeview	PARTICIPATING	468	0	Yes
2016	TRANSFER	Acme Steel Co	GENERAL	Acme Packaging	GENERAL	221	0	Yes
2016	TRANSFER	AGI North America LLC	GENERAL	Multifilm Packaging Corp	PARTICIPATING	162	50	Yes
2016	TRANSFER	American NTN Bearing Mfg Corp	PARTICIPATING	S & C Electric Co	PARTICIPATING	30	1100	Yes
2016	TRANSFER	AMPAC Flex LLC	PARTICIPATING	Dart Container Corp of Illinois	PARTICIPATING	200	1000	Yes
2016	TRANSFER	Berlin Industries	GENERAL	American Litho Inc	PARTICIPATING	80	100	Yes
2016	TRANSFER	Bluegrass Labels Co LLC	GENERAL	Captive Plastics LLC	PARTICIPATING	242	0	Yes
2016	TRANSFER	Brown Printing Co	GENERAL	Brown Printing Co	GENERAL	162	0	Yes
2016	TRANSFER	Brown Printing Co	GENERAL	Brown Printing Co	GENERAL	88	0	Yes
2016	TRANSFER	BWay Packaging	GENERAL	BWAY Corp	PARTICIPATING	398	0	Yes
2016	TRANSFER	FCL Graphics Inc	PARTICIPATING	Multifilm Packaging Corp	PARTICIPATING	70	100	Yes
2016	TRANSFER	Marathon Ashland Petroleum LLC	GENERAL	MPLX Terminals LLC	PARTICIPATING	177	0	Yes
2016	TRANSFER	Meyer Steel Drum Inc	PARTICIPATING	Meyer Industrial Container	PARTICIPATING	100	0	Yes
2016	TRANSFER	Palex Container Systems	GENERAL	Meyer Steel Drum Inc	PARTICIPATING	431	0	Yes
2016	TRANSFER	Palex Container Systems	GENERAL	Meyer Steel Drum Inc	PARTICIPATING	431	0	Yes
2016	TRANSFER	Rexam Release	GENERAL	Loparex Inc	GENERAL	191	0	Yes
2016	TRANSFER	Rock-Tenn Co	GENERAL	Rock-Tenn Company/Waldorf Corp	GENERAL	611	0	Yes
2016	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	Dart Container Corp of Illinois	PARTICIPATING	311	150	Yes
2016	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	Dart Container Corp of Illinois	PARTICIPATING	200	180	Yes
2016	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	S & C Electric Co	PARTICIPATING	100	150	Yes
2016	TRANSFER	Silgan Closures LLC	GENERAL	Silgan Containers Corp	GENERAL	1313	0	Yes
2016	TRANSFER	Silgan Containers Corp	GENERAL	Caterpillar Inc	PARTICIPATING	100	250	Yes
2016	TRANSFER	Sleepeck Printing Co	GENERAL	Environmental Compliance Consulting Ltd	GENERAL	233	0	Yes
2016	TRANSFER	St Clair Pakwell	GENERAL	Graphic Packaging Intl Inc	PARTICIPATING	100	0	Yes
2016	TRANSFER	Triton West LLC	PARTICIPATING	Buckeye Terminals LLC	PARTICIPATING	2	0	Yes
2016	TRANSFER	Triton West LLC	PARTICIPATING	Shell Pipeline Co LP	PARTICIPATING	35	0	Yes
2016	TRANSFER	Viskase Corp	GENERAL	Prairie State Group	NEW	100	63	Yes
2016	TRANSFER	Viskase Corp	GENERAL	Aux Sable Liquid Products	NEW	250	63	Yes
2016	TRANSFER	Viskase Corp	GENERAL	Prairie State Group	NEW	20	63	Yes
2016	TRANSFER	Viskase Corp	GENERAL	Brown Printing Co	GENERAL	70	60	Yes
2016	TRANSFER	Viskase Corp	GENERAL	Air Products & Chemicals Inc	PARTICIPATING	230	63	Yes
2016	TRANSFER	Viskase Corp	GENERAL	KNS Companies Inc	PARTICIPATING	250	65	Yes
2016	TRANSFER	Viskase Corp	GENERAL	Aux Sable Liquid Products	NEW	750	65	Yes
2016	TRANSFER	Zenith Electronics	GENERAL	Law Office of Katherine W. Delahunt	GENERAL	302	0	Yes
2016	TRADE	Abbott Laboratories	PARTICIPATING	AbbVie Inc	PARTICIPATING	165	0	Yes
2016	TRADE	Arlington Plating Co	PARTICIPATING	Chicago Steel Container Corp	PARTICIPATING	34	20	
2016	TRADE	Buckeye Terminals LLC	PARTICIPATING	Wood River Pipe Lines	NEW	6	0	Yes
2016	TRADE	Chicago Baking Co	GENERAL	Gold Standard Bakery	PARTICIPATING	244	20	
2016	TRADE	Fleischmann's Vinegar Co Inc	PARTICIPATING	Highland Baking Co	NEW	166	20	
2016	TRADE	Meyer Steel Drum Inc	PARTICIPATING	Georgia Nut Co	PARTICIPATING	75	20	
2016	TRADE	Pactiv Corporation	GENERAL	Pactiv LLC	NEW	178	0	Yes
2016	TRADE	Senior Flexonics	PARTICIPATING	Lake Book Mfg	PARTICIPATING	41	20	
2016	TRADE	The Segerdahl Corp	PARTICIPATING	Segerdahl Corp	PARTICIPATING	39	20	
2016	TRADE	Triton West LLC	PARTICIPATING	Shell Pipeline Co LP	PARTICIPATING	1	0	Yes

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Trading Year	Trade Type	Seller	Seller Type	Buyer	Buyer Type	ATUs Traded	\$/ATU	Trade Excluded from Average
2016	TRADE	Viskase Corp	GENERAL	Kerry Inc	PARTICIPATING	41	20	
2016	TRADE	Viskase Corp	GENERAL	Kerry Ingredients Inc	PARTICIPATING	167	20	
2016	TRADE	Viskase Corp	GENERAL	Campagna-Turano Bakery Inc	PARTICIPATING	97	20	Yes
2016	TRADE	Viskase Corp	GENERAL	Knead Dough Baking Co Inc	PARTICIPATING	191	20	Yes
2016	TRADE	Viskase Corp	GENERAL	Diageo North America Inc	PARTICIPATING	28	20	
2016	TRADE	Viskase Corp	GENERAL	East Balt Commissary LLC	PARTICIPATING	399	20	
2016	TRADE	Viskase Corp	GENERAL	New WinCup Holdings Inc	PARTICIPATING	156	20	
2016	TRADE	Viskase Corp	GENERAL	Interlake Mecalux Inc	NEW	123	20	

Range: \$20 / ATU  
Average: \$20 / ATU

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Trading Year	Trade Type	Seller	Seller Type	Buyer	Buyer Type	ATUs Traded	\$/ATU	Trade Excluded from Average
2017	TRANSFER	Acme Packaging	GENERAL	Signode-Bridgeview	PARTICIPATING	468	0	Yes
2017	TRANSFER	Acme Steel Co	GENERAL	Acme Packaging	GENERAL	221	0	Yes
2017	TRANSFER	AGI North America LLC	GENERAL	Multifilm Packaging Corp	PARTICIPATING	162	50	Yes
2017	TRANSFER	American NTN Bearing Mfg Corp	PARTICIPATING	S & C Electric Co	PARTICIPATING	30	1100	Yes
2017	TRANSFER	AMPAC Flex LLC	PARTICIPATING	Dart Container Corp of Illinois	PARTICIPATING	200	1000	Yes
2017	TRANSFER	Berlin Industries	GENERAL	American Litho Inc	PARTICIPATING	80	100	Yes
2017	TRANSFER	Bluegrass Labels Co LLC	GENERAL	Captive Plastics LLC	PARTICIPATING	242	0	Yes
2017	TRANSFER	Brown Printing Co	GENERAL	Brown Printing Co	GENERAL	162	0	Yes
2017	TRANSFER	Brown Printing Co	GENERAL	Brown Printing Co	GENERAL	88	0	Yes
2017	TRANSFER	BWay Packaging	GENERAL	BWAY Corp	PARTICIPATING	398	0	Yes
2017	TRANSFER	FCL Graphics Inc	PARTICIPATING	Multifilm Packaging Corp	PARTICIPATING	70	100	Yes
2017	TRANSFER	Marathon Ashland Petroleum LLC	GENERAL	MPLX Terminals LLC	PARTICIPATING	177	0	Yes
2017	TRANSFER	Meyer Steel Drum Inc	PARTICIPATING	Meyer Industrial Container	PARTICIPATING	100	0	Yes
2017	TRANSFER	Palex Container Systems	GENERAL	Meyer Steel Drum Inc	PARTICIPATING	431	0	Yes
2017	TRANSFER	Palex Container Systems	GENERAL	Meyer Steel Drum Inc	PARTICIPATING	431	0	Yes
2017	TRANSFER	Rexam Release	GENERAL	Loparex Inc	GENERAL	191	0	Yes
2017	TRANSFER	Rock-Tenn Co	GENERAL	Rock-Tenn Company/Waldorf Corp	GENERAL	611	0	Yes
2017	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	S & C Electric Co	PARTICIPATING	100	150	Yes
2017	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	Dart Container Corp of Illinois	PARTICIPATING	200	180	Yes
2017	TRANSFER	Rock-Tenn Company/Waldorf Corp	GENERAL	Dart Container Corp of Illinois	PARTICIPATING	311	150	Yes
2017	TRANSFER	Silgan Closures LLC	GENERAL	Silgan Containers Corp	GENERAL	1313	0	Yes
2017	TRANSFER	Silgan Containers Corp	GENERAL	Caterpillar Inc	PARTICIPATING	100	250	Yes
2017	TRANSFER	Sleepeck Printing Co	GENERAL	Environmental Compliance Consulting Ltd	GENERAL	233	0	Yes
2017	TRANSFER	St Clair Pakwell	GENERAL	Graphic Packaging Intl Inc	PARTICIPATING	100	0	Yes
2017	TRANSFER	Triton West LLC	PARTICIPATING	Buckeye Terminals LLC	PARTICIPATING	2	0	Yes
2017	TRANSFER	Triton West LLC	PARTICIPATING	Shell Pipeline Co LP	PARTICIPATING	35	0	Yes
2017	TRANSFER	Viskase Corp	GENERAL	Aux Sable Liquid Products	NEW	750	65	Yes
2017	TRANSFER	Viskase Corp	GENERAL	KNS Companies Inc	PARTICIPATING	250	65	Yes
2017	TRANSFER	Viskase Corp	GENERAL	Aux Sable Liquid Products	NEW	250	63	Yes
2017	TRANSFER	Viskase Corp	GENERAL	Brown Printing Co	GENERAL	70	60	Yes
2017	TRANSFER	Viskase Corp	GENERAL	Prairie State Group	NEW	100	63	Yes
2017	TRANSFER	Viskase Corp	GENERAL	Air Products & Chemicals Inc	PARTICIPATING	230	63	Yes
2017	TRANSFER	Viskase Corp	GENERAL	Prairie State Group	NEW	20	63	Yes
2017	TRANSFER	Zenith Electronics	GENERAL	Law Office of Katherine W. Delahunt	GENERAL	302	0	Yes
2017	TRADE	Abbott Laboratories	PARTICIPATING	AbbVie Inc	PARTICIPATING	165	0	Yes
2017	TRADE	Arlington Plating Co	PARTICIPATING	Chicago Steel Container Corp	PARTICIPATING	37	20	
2017	TRADE	Buckeye Terminals LLC	PARTICIPATING	Wood River Pipe Lines	NEW	6	0	Yes
2017	TRADE	Chicago Baking Co	GENERAL	Gold Standard Bakery	PARTICIPATING	176	20	
2017	TRADE	Continental Web Press Inc	PARTICIPATING	Segerdahl Corp	PARTICIPATING	40	25	
2017	TRADE	Continental Web Press Inc	PARTICIPATING	The Segerdahl Corp	PARTICIPATING	4	25	
2017	TRADE	Dow Chemical Co	PARTICIPATING	Oiltanking Joliet	PARTICIPATING	44	0	Yes
2017	TRADE	ExxonMobil Oil Corp	PARTICIPATING	ExxonMobil Oil Corp	PARTICIPATING	4	0	Yes
2017	TRADE	Fleischmann's Vinegar Co Inc	PARTICIPATING	Highland Baking Co	NEW	190	20	
2017	TRADE	Pactiv Corporation	GENERAL	Pactiv LLC	NEW	173	0	Yes

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Trading Year	Trade Type	Seller	Seller Type	Buyer	Buyer Type	ATUs Traded	\$/ATU	Trade Excluded from Average
2017	TRADE	Senior Flexonics	PARTICIPATING	Lake Book Mfg	PARTICIPATING	35	20	
2017	TRADE	Stickney Water Reclamation Plant	PARTICIPATING	Metropolitan Biosolids Management	PARTICIPATING	4	0	Yes
2017	TRADE	University of Illinois - Chicago	PARTICIPATING	University of Illinois at Chicago	PARTICIPATING	1	0	Yes
2017	TRADE	Viskase Corp	GENERAL	Diageo North America Inc	PARTICIPATING	45	20	
2017	TRADE	Viskase Corp	GENERAL	Hostess Brands LLC	PARTICIPATING	166	20	
2017	TRADE	Viskase Corp	GENERAL	Kerry Ingredients Inc	PARTICIPATING	118	20	
2017	TRADE	Viskase Corp	GENERAL	Kerry Inc	PARTICIPATING	26	20	
2017	TRADE	Viskase Corp	GENERAL	New WinCup Holdings Inc	PARTICIPATING	165	20	
2017	TRADE	Viskase Corp	GENERAL	Alpha Baking Co Inc	PARTICIPATING	254	18	
2017	TRADE	Viskase Corp	GENERAL	Campagna-Turano Bakery Inc	PARTICIPATING	110	20	Yes
2017	TRADE	Viskase Corp	GENERAL	Alpha Baking Co Inc	PARTICIPATING	269	18	
2017	TRADE	Viskase Corp	GENERAL	Wheatland Tube Co - Chicago Division	PARTICIPATING	135	20	
2017	TRADE	Viskase Corp	GENERAL	Alpha Baking Co	PARTICIPATING	58	18	
2017	TRADE	Viskase Corp	GENERAL	Interlake Mecalux Inc	NEW	51	20	
2017	TRADE	Viskase Corp	GENERAL	Knead Dough Baking Co Inc	PARTICIPATING	169	20	Yes

Range: \$18 - \$25 / ATU

Average: \$19.47 / ATU