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THE VOICE OF THE MOLYBDENUM INDUSTRY

23 November 2022

TO: Illinois Pollution Control Board

RE: R22-18 - Groundwater Quality 35 ILL.ADM.CODE 620 - Next hearing 7 December 2022 - Request to participate by conference call

The International Molybdenum Association, based in the United Kingdom, and counting US companies within its membership, has a global remit and therefore frequently engages in regulatory matters in different geographic jurisdictions, such as the setting of water quality standards in relation to molybdenum.

The Illinois Pollution Control Board will be aware that IMOA is actively engaged in the above-referenced ongoing Illinois rule-making process in relation to molybdenum, both with written submissions, the latest being on 27 October 2022, and earlier this year in person when Sandra Carey expressly travelled to Springfield Illinois to give verbal testimony at the hearing in that location on 22 June.

The next hearing is scheduled for 7/8 December this year in both Springfield and Chicago. IMOA wishes to continue its active participation but on this occasion our representative, Sandra Carey, is unable to make the transatlantic trip from the UK to take part at either of the afore-mentioned US locations.

We therefore respectfully request that she be granted permission to be able to participate via conference call from the UK on 7 December.

From reading a previous granting of a broadly similar request (IPCB 16 May 22, MidWest Generation LLC) we understand that Section 101.500(b) of the Board's procedural rules provide that the factors to be considered before ordering a hearing via videoconference include "cost-effectiveness, efficiency, facility accommodations, witness availability, public interest, the parties preferences, and the proceeding's complexity and contentiousness."

We therefore trust that our request sufficiently meets the above criteria, and we look forward to your kind response.

Yours sincerely

Sandra Carey

Sandra Carey

IMOA HSE Executive

Please respond to: sandracarey@imoa.info

Page 1 | 1

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