

ORIGINAL

ILLINOIS POLLUTION CONTROL BOARD

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IN THE MATTER OF:)
REASONABLY AVAILABLE)
CONTROL TECHNOLOGY)
(RACT) FOR VOLATILE)
ORGANIC MATERIAL)
EMISSIONS FROM GROUP II)
CONSUMER & COMMERCIAL)
PRODUCTS: PROPOSED)
AMENDMENTS TO 35 ILL.)
ADM. CODE 211, 218 and)
219.)

R10-8

(Rulemaking - Air)

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OCT 29 2009

STATE OF ILLINOIS
Pollution Control Board

RECORD OF HEARING

October 27, 2009

Reported by Holly A. McCullough,
C.S.R., C.C.R., R.P.R.

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ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
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REASONABLY AVAILABLE)
CONTROL TECHNOLOGY)
(RACT) FOR VOLATILE) R10-8
ORGANIC MATERIAL) (Rulemaking - Air)
EMISSIONS FROM GROUP II)
CONSUMER & COMMERCIAL)
PRODUCTS: PROPOSED)
AMENDMENTS TO 35 ILL.)
ADM. CODE 211, 218 and)
219.)

APPEARANCES:

BOARD MEMBERS:

Timothy J. Fox, Hearing Officer
Andrea S. Moore
Anand Rao

Shundar Lin

For Illinois Environmental Protection Agency:

Dana Vetterhoffer
1021 North Grand Avenue East
P. O. Box 19276
Springfield, IL 62794-9276
And David Bloomberg

INDEX OF EXHIBITS:

Exhibit No. 1 -- Page 7
(Exhibit No. 7 was marked for identification and
retained by Mr. Fox.)

1 The Board docket number for this rulemaking is
2 R10-8. The Illinois Environmental Protection Agency
3 filed this rulemaking proposal on July 9th of 2009,
4 and in an order dated August 6th of 2009, the Board
5 accepted the Agency's proposal for hearing, granted
6 the Agency's request for waiver of specific copy and
7 filing requirements, and denied the Agency's motion
8 for expedited review.

9 On August 12th, 2009, a hearing officer order
10 scheduled two hearings and set deadlines for prefiling
11 testimony, questions and responses, and pursuant to
12 that order, the Agency on September 14th of 2009
13 prefiled the testimony of Mr. David E. Bloomberg, who
14 is present here this morning. No other participant
15 has prefiled testimony for this hearing, and no
16 participant has prefiled any questions based on
17 Mr. Bloomberg's testimony.

18 We are, of course, today holding the first hearing
19 in this proceeding. The second hearing is now
20 scheduled to take place beginning Tuesday, December
21 8th, 2009 in Chicago.

22 This proceeding is governed by the Board's
23 procedural rules. All information that is relevant
24 and that is not repetitious or privileged will be

1 admitted into the record. And please note that any
2 questions posed today by the Board or by its staff are
3 intended solely to assist in developing a clear and
4 complete record for the Board's decision and do not
5 reflect any prejudgments on the proposal.

6 We will begin the hearing this morning with
7 Mr. Bloomberg's prefiled testimony on behalf of the
8 IEPA and then proceed to questions that any
9 participant may have on the basis of that testimony.
10 After those questions, we can turn to anyone who did
11 not prefile testimony, but who would like to testify
12 this morning. For the record, there is a sheet inside
13 the door in front of the Court Reporter on which any
14 person could indicate in spite of having prefiled no
15 testimony that they would like to testify today.

16 And, of course, for the benefit of our Court
17 Reporter, please speak clearly. I think acoustics
18 should be no problem here today. And avoid speaking
19 at the same time as another person.

20 Any questions at all about those preliminaries or
21 our procedure this morning?

22 (No response.)

23 MR. FOX: Very good. Miss Vetterhoffer, why don't
24 we go to you this morning, and I understand that you

1 had some brief introduction that you'd like to offer
2 into the record?

3 MS. VETTERHOFFER: Yes.

4 MR. FOX: Please go ahead.

5 MS. VETTERHOFFER: Thank you. I'm Dana
6 Vetterhoffer, Assistant Counsel on behalf of the
7 Illinois EPA. With me today is David Bloomberg,
8 Manager of the Compliance Unit in the Compliance
9 Section of the Division of Air Pollution Control,
10 Bureau of Air at the Illinois EPA. This rulemaking is
11 intended to satisfy clean air requirements regarding
12 reasonably available control technology for volatile
13 organic materials or VOM from Group II consumer and
14 commercial produced from areas designated as a
15 non-attainment with respect to the eight-hour ozone
16 national ambient air quality standard. This
17 rulemaking is in response to control techniques
18 guidelines or CTG's issued by the United States
19 Environment Protection Agency in October of 2006.
20 Illinois was required to submit revisions to its State
21 Implementation Plan or SIP in response to the CTG's by
22 October of 2007. Expeditious submittal of this rule
23 as a provision is necessary in order to avoid future
24 sanctions in non-attainment areas in Illinois to be

1 redesignated to the ozone standard. At this time I'd
2 like to move that Mr. Bloomberg's prefiled testimony
3 be entered into the record as an exhibit.

4 MR. FOX: Very good, Miss Vetterhoffer. Do you
5 have a copy of that that I may mark?

6 MS. VETTERHOFFER: Do you need more than one? I
7 have several copies?

8 MR. FOX: I think we're fine with a single copy.
9 Thank you.

10 MS. VETTERHOFFER: And we're ready to proceed to
11 questioning by the Board.

12 MR. FOX: And, Miss Vetterhoffer, pursuant to your
13 motion, I have marked the prefiled testimony of
14 Mr. David Bloomberg as Exhibit No. 1, and note again
15 your motion to admit that as a hearing exhibit. Is
16 there any objection to granting the motion?

17 (No response.)

18 MR. FOX: Neither seeing, nor hearing any, the
19 motion is granted, and that prefiled testimony is
20 entered into the record as Exhibit No. 1. I
21 understand that you're ready to have Mr. Bloomberg
22 proceed to any questions. Is this a good time to have
23 him sworn in?

24

1 (DAVID BLOOMBERG is sworn in by the Court
2 Reporter at this time.)

3

4 MR. FOX: Thank you very much. Mr. Bloomberg, on
5 behalf of the Board, Mr. Rao does have some questions
6 based on your prefiled testimony, and if you're all
7 set, we can have him go ahead and begin those.

8 MR. BLOOMBERG: Sure.

9 MR. RAO: I have a bunch of questions mostly to
10 satisfy the record. The first question is, the Agency
11 states in its statement of reason that they've engaged
12 in extensive outreach on the proposed regulations.
13 Could you please clarify whether the affected sources
14 are represented collectively by any trade groups or
15 organizations?

16 MR. BLOOMBERG: There are several organizations.
17 There is PII, which is the Printing Industry of
18 Illinois and Indiana, although they may have added
19 another "I" state without changing their initials.
20 That's how I remember them, anyway. There is the
21 Graphic Arts Technical Foundation. There is the
22 Specialty Graphics Industry Association, SGIA, and
23 that is -- that group was representing mostly screen
24 and digital printers for us. Those were the main ones

1 that we dealt with. I did outreach to flexible
2 packaging -- a flexible packaging association. I
3 can't remember the specific name of it. They
4 basically indicated that they weren't terribly
5 interested. They passed the information along to a
6 couple of their affected sources, got a few comments
7 back, but they didn't participate in discussions as
8 much as the others.

9 MR. RAO: Did you also deal with any of the
10 individual sources or just the organizations?

11 MR. BLOOMBERG: The initial round of the outreach,
12 which was done before I was brought on as technical
13 support for the Agency, I believe did go out to
14 some -- two individual sources, and I know we got
15 comments back from some individual sources, and then
16 it was also the initial draft was posted on the
17 Illinois EPA's website for all to see.

18 MR. RAO: Okay. On page 20 of the Technical
19 Support Document, it's under the industrial cleaning
20 solvents, the TSD notes that the USEPA estimated that
21 130 sources in Illinois will be affected by the
22 proposed industrial solvent limitations. Could you
23 please clarify whether the sources considered by USEPA
24 are the same as the affected sources listed in the

1 TSD?

2 MR. BLOOMBERG: I don't know. The USEPA did not
3 tell us what the sources were. They just said, "We
4 think that there are 130." They didn't -- As I
5 recall, they did not list. I actually I have the TSD
6 here, but --

7 MR. RAO: In Appendix B of the TSD, you have
8 listed the potentially affected sources, and under the
9 subheadings we have the lithographic printing sources
10 and then letter printing sources, flexible packaging
11 printing sources and flatwood paneling sources. So,
12 are these sources the universe of sources that would
13 be affected by industrial solvents, or it's like a
14 more general rule?

15 MR. BLOOMBERG: It's a very general. As I said,
16 it's really difficult to figure out who could be
17 affected because it could cross every industry, every
18 sort of manufacturing, anybody who uses this amount of
19 industrial cleaning solvents. We simply do not have
20 enough information because we don't ask sources to
21 provide us with that sort of information on the normal
22 basis for like annual emission reports or anything
23 like that. And, obviously, some of it would be
24 permitted, but some of these would fall below

1 currently permitted level. So, there was no good way
2 to make an estimate as to who might be affected, other
3 than everybody in the non-attainment area
4 theoretically could be.

5 MR. RAO: In terms of implementing these rules,
6 did the Agency contact a lot of these sources who have
7 become subject to these rules because the industrial
8 solvents will somehow find out about these new
9 regulations that may apply to them and comply with
10 some of the reporting requirements and things like
11 that?

12 MR. BLOOMBERG: We do have plans to work with
13 small business people, ECEO. One of the industry
14 representatives -- one or two of them had mentioned
15 working with us, and, actually, one of my employees,
16 Jackie Simms, is also the Bureau of Air small business
17 person, who she worked somewhat on this earlier and is
18 aware of it and knows that we will need to make an
19 effort to make sure that sources are aware that this
20 is going on.

21 MR. RAO: Okay. The TSD notes that one of the
22 factors considered by the Agency in developing the
23 proposed regulation was the regulation of other
24 states, and the TSD provides a comparison table of VOM

1 limits for industrial cleaning solvents. Can you
2 clarify whether evaluation of other state regulations
3 was only limited to industrial solvent limits or if
4 they considered other categories, you know, proposed
5 rules on?

6 MR. BLOOMBERG: It was mostly the industrial
7 cleaning solvents because we started -- that is -- if
8 you look at the CTG from USEPA, although it's nice and
9 thick here --

10 MR. RAO: Yeah.

11 MR. BLOOMBERG: -- it's actually, you know,
12 only -- well, without references -- 10 pages, 11
13 pages. The rest is an attachment. So, it gives a
14 base limit and then says, "Here's some suggestions
15 from other possibilities." And, so, what we did is we
16 worked with the industry groups, and they said, "Well,
17 you know, in Wisconsin it's like this, or in this
18 state it's like this." So, we looked around. We
19 looked at California and various other places,
20 obviously, that we have listed here to get an idea of
21 what other states were doing for consistency purposes
22 across the board.

23 (Shundar Lin enters room.)

24 MR. BLOOMBERG: For the other regulations, we

1 didn't find the need to do that because Illinois was
2 kind of at the lead for some of this. Like
3 lithographic printing, Illinois has more lithographic
4 printing more than any other state, if I'm not
5 mistaken. And, so, we were kind of the lead there
6 rather than trying to catch up to what other states
7 had already done.

8 MR. FOX: If I may interrupt just for one moment.
9 If the record could reflect that we've now been joined
10 this morning by Dr. Shundar Lin, who is one of the
11 members of the Board. And I apologize for
12 interrupting.

13

14 (A brief discussion off the record.)

15

16 MR. RAO: From looking at the comparison tables,
17 it looks like the proposed VOM emission limits for
18 industrial solvents are generally consistent with the
19 standards of other states. Part of the general VOM
20 limits in California are almost 50 percent lower than
21 what the Agency has proposed for Illinois. Could you
22 please comment on the rationale for proposing a
23 general VOM limit of .42 pounds per gallon while
24 California has like .21?

1 MR. BLOOMBERG: Yeah. I believe, if I'm not
2 mistaken, that .42 comes directly out of the CTG.

3 MR. RAO: So, was that just like being California?

4 MR. BLOOMBERG: Possibly. And you notice, that's
5 only one part. You've got the South Coast. You've
6 got the Bay area, San Joaquin Valley. Both of them
7 are at .42. And let's see here. Yeah, it's on page 8
8 of the CTG. USEPA said, "We recommend that generally
9 applicable VOC content limit of 50 grams VOC per liter
10 (.42 pounds per gallon)."

11 MR. RAO: Okay. And on page 15 of the TSD
12 regarding the control devices for lithographic
13 printing lines, the TSD notes that while existing
14 control devices can meet the 95 percent limit, the
15 Agency decided not to seek the highest control
16 efficiency at the request of the printing industry
17 representatives. Could you please comment on what the
18 printing industry concerns were for requesting a lower
19 control efficiency than the higher 95 percent?

20 MR. BLOOMBERG: Well, the current rule says
21 90 percent, and although our experience at the Agency,
22 my personal experience in being the main contact for
23 the Agency for lithographic printers and for stat
24 tests, supervising for stat tests, exceed 95 percent.

1 The industry didn't -- Many of the industry
2 representatives didn't feel as confident. They felt
3 that there were some out there that couldn't meet 95
4 and maybe they just hadn't tested recently. So, I
5 didn't know about them. And rather than put someone
6 in a situation where you're going along fine, you're
7 getting 92 percent, which is the rule now, and then
8 you say, "Oh, now you have to get 95 percent," well,
9 that's a large investment. You think it's only 3
10 percent, but if you're maxing out your control device
11 at 92 and suddenly you have to increase to 95, that's
12 just not something that this regulation envisioned I
13 think if you look at the economic analysis and things
14 like that. So, going on a going forward basis, it's
15 elevated to 95, but for existing, already constructed
16 control devices constructed at the source, then we
17 left it at 90.

18 MR. RAO: Okay. On page 14 of the TSD regarding
19 the flexible packaging printing, the TSD notes sources
20 using add-on control devices will continue to do so to
21 meet the new compliance limits under Section
22 218.401(c). Could you please clarify whether these
23 sources will be able to meet the new limits with minor
24 operation modifications, or will the limits remain the

1 same for them?

2 A. If you look at 401(c)(3) --

3 MR. RAO: (c)(3), yeah.

4 MR. BLOOMBERG: -- and it lists the different --
5 all these different scenarios --

6 MR. RAO: Yeah.

7 MR. BLOOMBERG: -- if you cross-reference 65, 70,
8 65 according to the dates, if you cross-reference that
9 back to I think it's (c)(1)(D) --

10 MR. RAO: Okay.

11 MR. BLOOMBERG: -- you'll see those percentages
12 should be the same. So, it takes into account again
13 the date of construction at the source.

14 MR. RAO: Okay.

15 MR. BLOOMBERG: So that there should not be any
16 need to --

17 MR. RAO: Upgrade.

18 MR. BLOOMBERG: -- to upgrade, correct.

19 MR. RAO: Okay. On page 16 of the TSD, it states
20 that sources may opt out of the exclusions available
21 for sources with VOM emissions between 15 and
22 100 pounds per day and, thus, would not need to
23 calculate the amount of emissions. Could you please
24 clarify whether these sources do not have to show

1 calculations that their emissions are below 100 pounds
2 per day even if they opt out of the exclusion? So,
3 basically what I'm asking you is, if they opt out of
4 the exclusion, they don't need to show the
5 calculations?

6 MR. BLOOMBERG: We're trying to find it in the
7 mass of changes.

8 MR. RAO: That's why there's a motion to amend and
9 the proposal, I'm having a hard time trying to figure
10 that out. So -- You can always get back to us on that
11 one if you want to at the next hearing. We have at
12 least one question remaining at the second hearing.

13 MR. BLOOMBERG: Okay. In 218.411(g)(2) --

14 MR. RAO: Okay.

15 MR. BLOOMBERG: -- it talks about the -- unless
16 the source is certified, it will not make use of the
17 exclusion. I understand there's a double negative
18 there, but -- You know, then you have to collect and
19 record the information under (g)(2)(A). And, so,
20 therefore, you would not have to report the
21 information under (g)(2)(A) if you did state you would
22 not be using the exclusion. So, that would be the
23 calculation that demonstrate combined emissions never
24 exceeding a hundred pounds per day, and the amount of

1 cleaning material that does not comply with the
2 cleaning material limitations. That's the only things
3 you need to do if you want to make use of the
4 exclusion because the exclusions only apply between 15
5 and a hundred pounds. So, if you're not making use of
6 them, it doesn't matter whether you're above 15 or
7 whether you're above a hundred.

8 MR. RAO: Okay. Thank you. On page 3 of the
9 motion to amend, the Agency proposes to delete the
10 language concerning the method of compliance at
11 Section 218.187(e)(2)(A) in response to industry
12 comments. Could you please elaborate on the
13 industry's concern regarding the inclusion of method
14 of compliance in the rules?

15 MR. BLOOMBERG: Not that I want to speak for
16 industry, but the concern as it was conveyed to us was
17 as long -- industry felt that as long as sources are
18 saying, "Yes, we are complying," they should not have
19 to say, "And this is the limit with which each
20 cleaning solution will comply," the specific limit
21 because they might use different cleaning solutions.
22 They might change over time. So, they felt it was I
23 guess probably safer for their sources to just say,
24 "Yes, we're complying," rather than risk being

1 accidentally out of compliance by failing to certify
2 which limit or to keep up-to-date with certification
3 of such a thing. They felt that because they were
4 some smaller sources, you know, that the record
5 keeping, they might not be able to keep up with it.
6 So, in this instance, we agreed that that was
7 reasonable.

8 MR. RAO: Do they still as part of their record
9 keeping keep track of what solutions they're using
10 and, you know, what the limits are, or will they just
11 be making a general certification of statement saying
12 that they're in compliance?

13 MR. BLOOMBERG: If they're subject, then they're
14 also subject to the record keeping requirements. Then
15 they should be keeping track of all of the different
16 cleaning solutions that they're using and ensuring
17 they are indeed compliant.

18 MR. RAO: Okay. So, they just don't want it as
19 part of this particular program?

20 MR. BLOOMBERG: Right.

21 MR. RAO: On page 6 of the motion to amend, the
22 Agency pro -- actually, it's on page 4 under "flexible
23 packaging printing," the Agency proposes to delete the
24 reference to "instruments by which owner or operators

1 may calculate the volume or weight of coatings and ink
2 because such instrumentation is not currently
3 available to the sources". Would you please clarify
4 whether such instrumentation is not being currently
5 used by the affected sources, or those instruments are
6 not generally available in the marketplace?

7 MR. BLOOMBERG: An industry representative sent me
8 an e-mail on it looks like -- well, I'm not sure when
9 theirs was, but I responded on July 30th, noting the
10 instrument mentioned has been in the rule for awhile
11 now and asking, "Are you saying there is simply no
12 point in having that in there?", and Gary Jones, who
13 is the Director of EHS Affairs for the Printing
14 Industries of America, which is an oversight group to
15 PII, said quote, "Yes, as there's no instruments that
16 can be used for this purpose."

17 MR. RAO: Okay. I just want to make sure, because
18 it was an argument that they're not required to use
19 it. So, I just wanted to make sure.

20 MR. BLOOMBERG: I agree, but they said there was
21 no point in having it since it can't be done, and,
22 well, okay.

23 MR. RAO: Sounds good. Going on to page 15 of the
24 motion to amend, the Agency proposes to change the

1 material used threshold for lithographic printing
2 lines based on USEPA determination. Please clarify
3 whether the USEPA determination referenced in the
4 motion to amend was published as apart of a guidance
5 document or a rule?

6 MR. BLOOMBERG: No, it was not. It was done as
7 part of conversations between Region 5 and the
8 headquarters people in charge of this particular group
9 of CTG's, and that was done at the urging of the
10 industry representatives we had been dealing with.

11 MR. RAO: Okay. Thank you. I just wanted to know
12 if it was part of any guidance document, but it's not.

13 MR. BLOOMBERG: Supposedly they've been working on
14 a model rule for these items, but considering that,
15 you know, here we are in rulemaking process, and we're
16 a bit behind where we were supposed to be here in
17 Illinois, and they still don't have that model rule
18 out. It's probably not going to be of much use to
19 people.

20 MR. RAO: And many of the states are already in
21 the rulemaking process, or are some of them waiting
22 for the model?

23 MR. BLOOMBERG: Some are in the process. Some are
24 probably further behind.

1 MR. RAO: Okay. On page 16 of the motion to
2 amend, the Agency proposes to delete the provision
3 requiring VOM calculations to be included in the
4 notification of threshold exceedence in response to
5 industry concerns. Would you please clarify whether
6 the owner or operator is required to notify the Agency
7 that the threshold of 6.8 kilograms per day was
8 exceeded without qualifying the actual emissions, or
9 should the notification also state by how much the
10 threshold was exceeded? I realize they don't have to
11 show the calculations, but will they just say, "We
12 exceeded the threshold," or will they say, "Yeah, we
13 had like 20 KE per day."

14 MR. BLOOMBERG: Well, as it's worded, they do not
15 have to tell us how much they exceeded it by. Any
16 exceedence is a calculation anyway. It's not a
17 particular exceedence on a particular day. It's
18 averaged out over the whole month. The key really is
19 we want to know, "Are you now subject to the rule?"
20 So, if they're going to tell us that they're subject,
21 it really doesn't matter whether they're at 16 pounds
22 per day or 26 or 36 pounds per day. They're subject.
23 And then, of course, we will get their emission
24 information through other methods such as the annual

1 emission report. If they had a limit in their permit
2 on top of it saying, "You have to stay below," or
3 whether they exceed any limit in their permit,
4 certainly they would need to report that to us and
5 tell us what they actually emitted, but not as part of
6 this. We're more concerned with, "Now the rule
7 applies to you."

8 MR. RAO: But if they want to stay below the
9 threshold, then they need to submit the calculations
10 as part of being exempted from the rule?

11 MR. BLOOMBERG: They should have submitted that or
12 at least certified to it when the rule goes into
13 effect.

14 MR. RAO: The initial --

15 MR. BLOOMBERG: Right, the initial. And then they
16 have to maintain those records on-site, but they don't
17 need to continually submit new calculations.
18 Hopefully, our field staff will, you know, when they
19 pay them a visit, will take a look at it and make sure
20 everything is being done properly.

21 MR. RAO: Okay. Thank you very much. That's all
22 I have.

23 MR. FOX: Member Moore, is there a question that
24 you wish to ask?

1 MS. MOORE: No.

2 MR. FOX: Dr. Lin, do you have -- did you have a
3 question that you wanted to pose on the record for the
4 representatives?

5 DR. LIN: No.

6 MR. FOX: Thank you. I think we've come to the
7 end of the questions there. Mr. Rao has indicated
8 that he has exhausted the list he had. We've got a
9 couple of quick procedural issues. If we may go off
10 the record and address those.

11

12 (A brief recess off the record.)

13

14 MR. FOX: We're back on the record after
15 discussing some procedural issues with the
16 participants. First of all, let me clarify that
17 copies of this transcript of today's hearing should be
18 available to the Board within eight business days, by
19 Friday, December -- November 6th of 2009, and very
20 soon after they are available, the Board will post
21 that transcript, the entire text on the Board's
22 website under this docket number, R10-8.

23 The second hearing is now scheduled and will
24 continue to take place as scheduled on Tuesday,

1 December 8th, 2009 beginning at 9:00 a.m. in Chicago,
2 with the following deadlines: The deadline for
3 prefiled testimony that any participant may wish to
4 offer due on Tuesday, November 17th of 2009, and
5 prefiled questions that the Agency or other
6 participants may wish to file based on that prefiled
7 testimony due on Thursday, December 3rd of 2009, and
8 the quote "mailbox rule" unquote in the Board's
9 procedural rules would not apply to those filings.
10 So, they would be due on those two specific deadlines.

11 In addition, any person may file written public
12 comments in this rulemaking with the Clerk of the
13 Pollution Control Board. Those filings, as all
14 others, may be made electronically through the Board's
15 Clerk's office on-line or COOL, and any questions
16 about electronic file through COOL should be directed
17 to the Clerk's office. Filings whether paper or
18 electronic must also be served on the hearing officer
19 and those persons who are on the service list, and
20 before filing, I'd ask that any participant check with
21 our Board's Clerk to ensure that they have the most
22 recent and complete version of the service list.

23 If anyone has questions about the procedural
24 aspects of the rule, my contact information is on the

1 Board's website. Are there any questions about
2 procedure or any other matters before we adjourn?

3 (No response.)

4 MR. FOX: I thank the Agency, Miss Vetterhoffer,
5 Mr. Bloomberg for your travel this morning and for
6 your time and effort. It's always appreciated by the
7 Board. And with those details taken care of, we're
8 adjourned.

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1 STATE OF ILLINOIS)

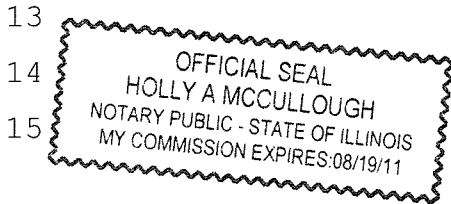
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2 COUNTY OF ST. CLAIR)

3

4 I, HOLLY A. McCULLOUGH, a Notary Public
5 within and for the County of St. Clair, State of
6 Illinois, do HEREBY CERTIFY that the foregoing record
7 was made before me on October 27, 2009, at the Madison
8 County Administration Building, County Board Room
9 #203, 157 North Main Street, Edwardsville, Illinois.

10 IN WITNESS WHEREOF, I have hereunto set my
11 hand and affixed my Notarial Seal the 28th day of
12 October, 2009.



Holly A. McCullough

HOLLY A. McCULLOUGH

Notary Public

CSR #084-004265

RPR #821968

CCR #1011

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