

THE ILLINOIS POLLUTION CONTROL BOARD

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STATE OF ILLINOIS
Pollution Control Board

IN THE MATTER OF:)
)
 PROPOSED AMENDMENTS TO)
 NONHAZARDOUS SPECIAL WASTE) R12-13
 HAULING AND THE UNIFORM) (Rulemaking-Land)
 PROGRAM: 35 Ill Adm. Code 809.)

TRANSCRIPT FROM THE PROCEEDINGS

taken before HEARING OFFICER TIMOTHY J. FOX
 by LORI ANN ASAUSKAS, CSR, RPR, a notary public
 within and for the County of Cook and State of
 Illinois, at the Illinois Pollution Control Board,
 1021 North Grand Avenue East (North Entrance),
 Springfield, Illinois, on the 12th day of
 January 2012, A.D., at 1:00 o'clock p.m.

1 A P P E A R A N C E S:

2 ILLINOIS POLLUTION CONTROL BOARD,
3 100 West Randolph Street
4 Suite 11-500
Chicago, Illinois 60601
(312) 814-6983

5 BY: MR. TIMOTHY J. FOX, HEARING OFFICER,

6

7 ILLINOIS POLLUTION CONTROL BOARD MEMBERS PRESENT:

8

9 Mr. Thomas E. Johnson, Board Member
10 Mr. Thomas Holbrook, Board Member
11 Ms. Deanna Glosser, Ph.D., Technical Unit

12

13

14 ILLINOIS ENVIRONMENT PROTECTION AGENCY,
15 1021 North Grand Avenue East
16 P.O. Box 19276
17 Springfield, Illinois 62794-9276
18 (217) 782-5544

19 BY: MS. KIMBERLY A. GEVING,

20

21 ALSO PRESENT:

22

23 Ms. Hope Wright, IEPA
24 Mr. David Walters, IEPA
Mr. Steve Davis, AIC

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1 HEARING OFFICER FOX: All right.

2 It looks like we're all set to begin. Good
3 afternoon everyone and welcome to this Illinois
4 Pollution Control Board hearing.

5 My name is Tim Fox and I'm
6 the hearing officer for this rulemaking
7 proceeding, which is entitled, "Proposed
8 Amendments to Non-Hazardous Special Waste
9 Hauling and the Uniform Program, 35 Illinois
10 Administrative Code 809." The Board docket
11 number for this rulemaking is R12-13.

12 First of all, I want to
13 introduce today from the Board at my immediate
14 right is Board Chairman, Tom Holbrook, who is
15 the lead Board member for this rulemaking. At
16 my left is Board member, Thomas E. Johnson, and
17 at Chairman Holbrook's right is Board member,
18 Deanna Glosser.

19 The Illinois Environmental
20 Protection Agency filed this rulemaking proposal
21 with the Board on October 28, 2011, in an order
22 dated November 17, 2011. The Board accepted
23 that proposal for hearing and we, today, of
24 course, are holding the first hearing in this

1 proceeding in an order dated November 21, 2011.

2 The hearing officer directed
3 participants wishing to file pre-filed testimony
4 for the first hearing to do so on or before
5 Thursday, December 29, 2011.

6 On December 20th, well in
7 advance of that deadline, the Board received
8 pre-filed testimony from the Illinois EPA by
9 Mr. David Walters. The Board promptly posted
10 that testimony -- that pre-filed testimony to
11 the clerk's office online, or COOL, and let
12 the record reflect that Mr. Walters is present
13 here today.

14 I also want to note for the
15 record that the Agency has been joined by
16 Ms. Hope Wright, who had indicated that she is
17 available to assist in answering any questions
18 that may be directed to the Agency on the basis
19 of its proposal.

20 What we will do is begin
21 the hearing with the pre-filed testimony filed
22 by Mr. Walters on behalf of the Agency. Section
23 104.424(f) of the Board's procedural rules
24 provides that his pre-filed testimony will be

1 entered into the record as if read, but we
2 can certainly begin with a brief summary or
3 introduction if Mr. Walters wishes to provide
4 one. Then we were turn to questions that any
5 of us here present today may have for the
6 Agency on the basis of that testimony.

7 After those questions, we
8 can see whether there is anyone present who
9 did not pre-file testimony, but who would
10 like to testify here today. The Board's
11 procedural rules allow testimony that is not
12 pre-filed as time permits and where it will
13 not prejudice another participant. There
14 is a sheet just inside the door to this room
15 on which anyone can indicate that they would
16 like to testify today, but shortly before
17 beginning, I did see that no name appeared on
18 that. No one had signed in indicating that
19 they wished to testify.

20 As time allows, after we
21 complete the testimony and questions, we can
22 determine whether there is anyone who would
23 like to offer a public comment on the Agency's
24 proposal.

1 Generally, of course, this
2 proceeding is governed by the Board's procedural
3 rules so that all information that is relevant
4 and that is not repetitious or privileged will
5 be admitted into the record.

6 Please bear in mind that any
7 questions posed today either by the Board or its
8 staff are intended only to assist in developing
9 a clear and complete record for the Board's
10 decision and do not reflect any pre-judgment on
11 the proposal.

12 So do we have any questions
13 at all about procedures before we begin? Very
14 good.

15 Ms. Geving, it is time to
16 turn this over to the Agency. As we were
17 beginning the hearing, you had provided to me
18 copies both of the Agency's original statement
19 in support of its proposal, the statement of
20 reasons in support of the proposed amendments
21 to Part 809, and separately a second document,
22 the pre-filed testimony of Mr. David Walters.

23 I'm going to assumed that
24 you intended to move to admit those into the

1 record as hearing exhibits; am I correct?

2 MS. GEVING: That's correct.

3 HEARING OFFICER FOX: Very good.

4 Is there any objection to motion to admit those
5 two into the record?

6 Neither seeing nor hearing any,
7 Ms. Geving, just for the sake of clarity, I will
8 mark the original rulemaking proposal by the
9 Agency as Hearing Exhibit No. 1 and Mr. Walters'
10 pre-filed testimony, the copy of that document,
11 as Hearing Exhibit No. 2.

12 (Documents marked as Hearing
13 Exhibit Nos. 1 and 2 for
14 identification, 1/12/12.)

15 HEARING OFFICER FOX: And with the
16 grant of the motion, those are now admitted into
17 the record of the proceeding.

18 (Hearing Exhibit Nos. 1 and 2
19 were admitted for the record,
20 1/12/12.)

21 HEARING OFFICER FOX: And if you have
22 no further issues to bring up, Ms. Geving, perhaps
23 we could go right to swearing in both Ms. Wright and
24 Mr. Walters and proceed to questions.

1 MS. GEVING: That's fine.

2 HEARING OFFICER FOX: Very good.

3 (Mr. Walters and Ms. Wright
4 sworn.)

5 HEARING OFFICER FOX: Thank you.

6 Mr. Walters, as I have indicated,
7 we do have your pre-filed testimony admitted into
8 the record as if read. If you have a brief summary
9 or introduction that you would like to offer, please
10 feel free to begin that now.

11 MR. WALTERS: Well, I just want to
12 give a real, quick, brief statement. The purpose
13 of today is to have the regulations conform to
14 Public Act 0970220, which in effect abolishes the
15 Uniform Hazardous Waste Permitting Program has
16 done for the last 12 or 13 years.

17 In addition, as long as we have
18 made these amendments to Part 809, we're doing some
19 clean-up of things that have changed since the last
20 time these rules were completed.

21 HEARING OFFICER FOX: Very good.

22 Mr. Walters, if you are prepared to do so, we can
23 see Mr. Davis, whether you have any questions you
24 would like to pose to the Agency at this point.

1 MR. DAVIS: No, I don't.

2 HEARING OFFICER FOX: Very good.

3 Mr. Walters, I do have a few
4 questions from the Board and if I may, I can begin
5 to attack those one-by-one.

6 MR. WALTERS: Sure.

7 HEARING OFFICER FOX: The first
8 question is this, that on Page 1 of your pre-filed
9 testimony, you stated that prior to the adoption
10 of the Uniform State Hazardous Materials
11 Transportation and Registration Program, in 1998,
12 the Agency issued one special waste hauler permit
13 that was valid for haulers of non-hazardous and
14 hazardous special waste that was generated either
15 in or destined to an Illinois facility.

16 Could you clarify for the record,
17 please, whether the proposal requires the Agency
18 to return to issuing a single special waste hauler
19 permit for transporting both hazardous and
20 non-hazardous special waste?

21 MR. DAVIS: Yes, it does. When
22 the language eliminating the uniform program
23 was taken out or when that language was eliminated,
24 the remaining language requires anybody transporting

1 special waste to get a special waste hauler
2 permit and hazardous waste is a type of
3 special waste. Therefore, they are required
4 to get the special waste hauler permits now.

5 HEARING OFFICER FOX: Very good.

6 My second question, Mr. Walters,
7 is this, as proposed, the definition of special
8 waste hauling vehicle applies to vehicles
9 transporting non-hazardous special waste.

10 If you would, please, clarify
11 for the record whether the Agency did intend to
12 limit the definition only to vehicles transporting
13 non-hazardous special waste or whether it had
14 intended to apply it to vehicles transporting
15 either hazardous or non-hazardous special waste
16 and if I may give you a page number, it looks
17 like Page 9 of the proposal in the definition
18 section.

19 MR. WALTERS: It should clearly
20 be both, non-hazardous and hazardous special
21 waste.

22 HEARING OFFICER FOX: And is it
23 the Agency's position then that near the end
24 of the second line of that definition the term

1 non-hazardous simply should be struck? Would
2 that make it consistent with the Agency's
3 intent?

4 MR. WALTERS: Either struck or
5 add hazardous as well.

6 HEARING OFFICER FOX: Do you have
7 a position whether striking the one term --

8 MR. WALTERS: We strike the word
9 non-hazardous and just leave special waste.

10 HEARING OFFICER FOX: And again,
11 forgive me if I'm beating a dead horse, that
12 would just conform the definition to the Agency's
13 intentions?

14 MR. WALTERS: That's correct.

15 HEARING OFFICER FOX: Very good.

16 My third question, Mr. Walters,
17 is that on Page 6 of the statement of reasons,
18 the Agency states that Section 809.501(c), as in
19 Charlie, is deleted in its entirety because the
20 Agency no longer reviews manifests.

21 If you would, clarify, please,
22 whether the Agency will still review manifests
23 under Section 809.501(g), which is proposed for
24 re-designation under Subsection F?

1 MR. WALTERS: Hope, do you want to
2 answer?

3 MS. WRIGHT: We are proposing that
4 we not receive any manifests from any generator
5 and so, therefore, we would have none to review
6 unless it was an inspector going out in the field.

7 HEARING OFFICER FOX: And Ms. Wright,
8 I'll direct this to you. In that case, is there
9 any -- would the Agency propose any amendment to
10 what is re-designated as Subsection F to reflect
11 that position?

12 MS. WRIGHT: I think it's already
13 there because they aren't sending copies to us.
14 So we would have none to review. That was
15 already -- I mean, that was the intent.

16 HEARING OFFICER FOX: And it's your
17 position that the language that is in the Agency's
18 proposal adequately reflects the Agency's intent
19 on reviewing manifests?

20 MS. WRIGHT: Right. We would not
21 have any.

22 HEARING OFFICER FOX: Very good.
23 Thank you for clarifying, Ms. Wright.

24 I can turn to a fourth question

1 and Mr. Walters, perhaps we can start with you.

2 MR. WALTERS: Uh-huh.

3 HEARING OFFICER FOX: The proposed
4 changes at Section 809.501(d), which is proposed
5 to be re-designated as Subsection C, and I believe
6 that's at the top of Page 24, the twenty-fourth
7 page of the proposed rulemaking language, it
8 states that the manifests will consist of forms
9 as prescribed by USEPA for the uniform hazardous
10 waste manifest and will be distributed in
11 accordance with those requirements.

12 Could you provide a citation
13 to those federal requirements or briefly summarize
14 them for us?

15 MR. WALTERS: I can briefly summarize
16 them. In 2006, the United States Environmental
17 Protection Agency changed their requirements and
18 said that the Illinois EPA could no longer be the
19 sole provider of hazardous waste manifests to
20 hazardous waste generators.

21 At that point they allowed
22 a number of printers to print these manifests
23 themselves and sell them to hazardous waste
24 generators without the Illinois EPA being

1 involved. So we could no longer sell those
2 manifests or mandate that the generators buy
3 them from the Illinois EPA.

4 HEARING OFFICER FOX: Mr. Walters,
5 did the revision you referred to in the federal
6 rules change the substance of those manifests
7 or the information supplied in them or was the
8 change limited to the parties who are eligible
9 to produce, print or distribute those?

10 MS. WRIGHT: They changed the
11 substance of the manifests and that's been
12 adopted in 721.

13 HEARING OFFICER FOX: Very good.
14 Thank you.

15 MR. WALTERS: That's Hope.

16 MS. GEVING: For clarification for
17 the record, do you mean 135 Illinois Administrative
18 Code Part 721?

19 MS. WRIGHT: Right.

20 HEARING OFFICER FOX: Ms. Geving,
21 thank you. That was helpful.

22 The next question I wanted to
23 turn to was my fifth. The Agency proposes to
24 delete Sections 809.501(h) and (i), which provide

1 reporting requirements for generators of waste
2 going out of state. On Page 6 of the statement
3 of reasons, the Agency indicated that the reporting
4 requirements are not required by the Environmental
5 Protection Act and that the information does not
6 provide sufficient benefit to justify the cost to
7 industry.

8 If you would clarify beginning
9 perhaps with you again, Mr. Walters, clarify
10 for the record whether the proposed deletion
11 of those two subsections and the reporting
12 requirements in them are based upon Public
13 Act 97-220?

14 MR. WALTERS: No, they are not.

15 HEARING OFFICER FOX: Does the
16 Agency happen to have any information on the
17 cost of those reporting requirements for the
18 regulated entities as opposed to the Agency
19 itself?

20 MR. WALTERS: We don't have any
21 cost per se as to what that would cost the
22 regulated community.

23 MS. WRIGHT: You could ask Steve.
24 He could probably address it.

1 HEARING OFFICER FOX: If Mr. Davis
2 is willing to testify, we could pose that question
3 to him.

4 MR. DAVIS: Sure.

5 HEARING OFFICER FOX: I do want
6 to turn to the next question, question six,
7 regarding economic reasonableness. The Agency
8 stated on Page 4 of the statement of reasons
9 that the adoption of the proposal -- of the
10 Agency's proposal would save the state approximately
11 \$34,600 per year in staff resources.

12 Would you comment on whether
13 the adoption of these rules as proposed would
14 have any economic benefit for the entities that
15 are regulated under Part 809?

16 MR. WALTERS: We do not believe
17 that there would be any economic benefits to
18 those parties that are affected here because
19 they either would have had to be permitted under
20 the uniform program or the special waste hauling
21 permit. So we don't see any economic benefit to
22 them at this time.

23 HEARING OFFICER FOX: Please
24 forgive me if I'm putting words in your mouth,

1 Mr. Walters. It sounds as if the deletion of
2 those requirements would not relieve those
3 entities of any kind of reporting or other
4 responsibilities. Is that a fair assessment?

5 MR. WALTERS: That's very correct.

6 HEARING OFFICER FOX: Great. Thank
7 you for clarifying.

8 I have one additional question
9 and it pertains to Section 809.103, definitions.
10 The Agency proposed to strike definitions of two
11 terms, uniform permit and uniform registration.
12 Those are both found in -- used in the proposed
13 new Section 809.1001, the single section that
14 the Agency proposed to add to Subpart J.

15 Would you comment, Mr. Walters
16 or Ms. Wright, I certainly don't mean to overlook
17 you, on whether Part 809 should retrain those
18 definitions or some version of them until all
19 of the current uniform program haulers have
20 been reissued the special waste hauler permit?

21 MR. WALTERS: We believe that,
22 yes, they should be retained until all of those
23 transporters of permit under Special Waste
24 Hauler Permit Program.

1 HEARING OFFICER FOX: Very good.

2 So it sounds like the Agency
3 would have no objection if in proceeding to
4 first notice, the Board simply maintained those
5 as they are currently --

6 MR. WALTERS: We would have no
7 objection.

8 HEARING OFFICER FOX: Very good.
9 I appreciate that clarification, Mr. Walters.

10 I have no further questions.
11 Before I see whether the Board has any that they
12 would like to pose, Mr. Davis, we can certainly
13 see whether on the basis of Mr. Walters' testimony
14 or his answers today you have any questions you
15 would like to pose to the Agency?

16 MR. DAVIS: No. I don't have any
17 questions, but I'd be happy to make a statement.

18 HEARING OFFICER FOX: Very good.
19 Why don't we, if we could, Mr. Davis, see whether
20 the Board members have any questions. We have
21 no other parties -- no other participants who
22 have appeared indicating any willingness to
23 testify. We could have you offer a public
24 comment that would go into the Board's record

1 through our court reporter.

2 But let me see, first of all,
3 if the Board members, any of them, have any
4 questions. I don't see any indication that
5 the Board members do have any questions.

6 So Mr. Davis, why don't we
7 have you come up to the table. That might be
8 a better place for you to be recorded by our
9 court reporter. If you have a comment that
10 you would like to offer on the Agency's proposal,
11 please proceed with that.

12 MR. DAVIS: Great. Sounds good.
13 I would like to first thank the Board for the
14 opportunity. I wasn't prepared to actually
15 testify today. I apologize. I have a really
16 bad cold.

17 I'm Steve Davis. I'm the
18 regulatory manager for the Association of
19 Illinois Electrical Cooperatives.

20 HEARING OFFICER FOX: If I may
21 interrupt you, Mr. Davis.

22 MR. DAVIS: Sure.

23 HEARING OFFICER FOX: If you would
24 like to have the Board consider your testimony as

1 evidence and would be willing to be sworn to the
2 testimony, we could swear you in and have you
3 proceed on that basis.

4 MR. DAVIS: Sure.

5 HEARING OFFICER FOX: Sorry to
6 interrupt.

7 (Mr. Davis sworn.)

8 HEARING OFFICER FOX: Please go
9 ahead.

10 MR. DAVIS: Sure. On behalf of
11 the Electrical Cooperatives in the state of
12 Illinois that we represent, I greatly appreciate
13 this opportunity.

14 I would just like to make a
15 quick statement that we would support the Agency
16 on these changes -- proposed changes based on
17 the reporting requirements the co-ops are currently
18 subject to and what we believe to be a little bit
19 of redundancy between the Illinois process and
20 USEPA process.

21 This would really help the
22 cooperatives reduce some of their reporting
23 requirements, minimize sort of the number of
24 hours that it would take over a year's time

1 to comply with all of the information, and
2 then generate the final report that has to
3 be submitted to the Agency.

4 They will continue tracking
5 the waste that they generate now as they are
6 required to do through USEPA regulations.
7 So that would still be held and files at the
8 cooperatives, but part of this rulemaking
9 change would really help on the reporting
10 side.

11 We appreciate the Agency's
12 attention to the detail and we would support
13 them in this change.

14 HEARING OFFICER FOX: Very good.

15 Mr. Davis, let me see first
16 whether the Agency has any questions based on
17 the testimony you've provided today.

18 MS. GEVING: I have one.

19 HEARING OFFICER FOX: Ms. Geving,
20 please go ahead.

21 MS. GEVING: Mr. Davis, do you
22 anticipate there will be any cost savings to
23 the regulative community by our amendment?

24 MR. DAVIS: I can't speak to the

1 entire regulatory community, but I can speak to
2 the co-ops in general, yes. We generally spend --
3 I did sort of mental math, you know, when this
4 came up a few minutes ago. I would say over a
5 year's time, co-ops in general would probably
6 spend about roughly 80 hours -- person hours
7 over the entire year in putting these together
8 and it would involve two or three different
9 staff members too. So yes, there would be a
10 sizeable cost.

11 The other thing, too, is that
12 cooperatives are pretty grass roots and a lot
13 of them don't have regulatory managers on their
14 staff and they rely heavily on the association
15 to assist them.

16 So when it comes time to report
17 and to track, they are really scrambling to put
18 these things together. So yes, there would be a
19 huge cost savings.

20 MS. GEVING: Okay. Thank you.

21 HEARING OFFICER FOX: Mr. Davis,
22 if I may follow-up, you referred to a savings
23 of 80 hours in staff time that you would expect
24 to be relieved from. Just to clarify, is that

1 80 hours in each of the co-ops?

2 MR. DAVIS: Yes.

3 HEARING OFFICER FOX: And how many
4 members do you have approximately?

5 MR. DAVIS: Well, cooperatives in
6 the state of Illinois, we have 26 transmission
7 cooperatives and two generation cooperatives.
8 So that 80 hours, you know, savings would be
9 multiplied by the 28.

10 HEARING OFFICER FOX: For an
11 approximate total number of hours of staff
12 time?

13 MR. DAVIS: Yes.

14 HEARING OFFICER FOX: Thank you,
15 Mr. Davis.

16 BOARD MEMBER HOLBROOK: Mr. Davis,
17 would you just define your role with the Illinois
18 Electric Co-ops a little more clearly --

19 MR. DAVIS: Sure.

20 BOARD MEMBER HOLBROOK: -- for me
21 so I understand your role with them since you're
22 here testifying for them?

23 MR. DAVIS: I'm the regulatory
24 manager for the association and my role is to

1 monitor rule changes within the state both in
2 JCAR, the Illinois EPA, DNR, whatever regulations
3 may affect the members and also my role is to
4 monitor regulations at the national level as
5 well and how they might affect the numbers in
6 the day-to-day operations of the cooperatives.

7 So any regulation change
8 that might, you know, either in a positive
9 way or negative way somehow impact one of the
10 members, it would be my job to weigh in and
11 to notify, to comment, to support, whatever
12 it takes to assist the members.

13 BOARD MEMBER HOLBROOK: Are you
14 their employee or are you a consultant and have
15 other clients?

16 MR. DAVIS: No. I work --

17 BOARD MEMBER HOLBROOK: I'm trying
18 to define your role with them.

19 MR. DAVIS: No. I work for the
20 association itself. I'm not a consultant. I
21 have been a consultant in my past life, but I'm
22 not in this role.

23 HEARING OFFICER FOX: Do the other
24 Board members have any addition questions? Very

1 good. Ms. Geving, another chance?

2 MS. GEVING: I have nothing further.

3 HEARING OFFICER FOX: That exhausts
4 the testimony that we had pre-filed. Again, I can
5 plainly see that neither in writing nor in person
6 has anyone else indicated a willingness to testify.

7 We have scheduled already the
8 second hearing in this docket, which will take
9 place on Wednesday, February 15, 2012, at 1:00
10 p.m., in Chicago. The deadline has already been
11 set, which is Wednesday, February 1, 2012, to
12 pre-file testimony for that hearing.

13 Our court reporter has indicated
14 that the transcript of today's hearing should be
15 available to the Board by January 24, 2012, and very
16 soon after it receives that, the Board will post it
17 to the clerk's office online, or COOL, where it
18 can be reviewed, copied and downloaded.

19 In addition, anyone may file
20 written public comments from this rulemaking
21 with the clerk of the Board. Those may be
22 filed electronically and questions about that
23 procedure should be directed to our clerk's
24 office. Those also must be served on the

1 hearing officer and those persons or entities
2 on the service list. You may certainly check
3 with our clerk's office before filing to make
4 sure that you have the most recent version of
5 the service list.

6 Before we adjourn, are there
7 any questions about procedures or any other
8 matters? We can certainly give everyone one
9 more chance to pose a question before everyone
10 heads out.

11 MS. GEVING: I have a procedural
12 question. Do you need me to prepare errata sheets
13 for the changes that we discussed today or is
14 the Board, on their own initiative, making those
15 changes?

16 HEARING OFFICER FOX: Ms. Geving,
17 my own sense is that the record has explained
18 clearly the limited number of changes and the
19 fairly simple changes. So I appreciate what I
20 suspect was an offer to prepare one, but I think
21 it's well understood what the Agency's position
22 is and the Board can proceed with that and the
23 record.

24 MS. GEVING: Okay. Thank you.

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HEARING OFFICER FOX: Surely.

Anything else?

With that, we are ready to adjourn. Thank you all for your participation and your information. It's much appreciated and we can close. Thank you.

(Whereupon, no further proceedings were had in the above-entitled cause and the proceedings were adjourned until February 15, 2012 at 1:00 p.m.)

1 STATE OF ILLINOIS)
2) SS.
3 COUNTY OF C O O K)
4
5

6 I, LORI ANN ASAUSKAS, CSR, RPR,
7 do hereby state that I am a court reporter doing
8 business in the City of Chicago, County of Cook,
9 and State of Illinois; that I reported by means
10 of machine shorthand the proceedings held in the
11 foregoing cause, and that the foregoing is a true
12 and correct transcript of my shorthand notes so
13 taken as aforesaid.

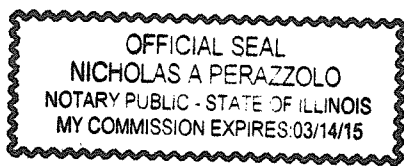
14
15
16 Lori Ann Asauskas CSR, RPR.

17 Lori Ann Asauskas, CSR, RPR.

18 Notary Public, Cook County, Illinois
19

20 SUBSCRIBED AND SWORN TO
21 before me this 18th day
22 of January, A.D., 2012.

23 Nicholas Perazzo
Notary Public



A	after 6:7,20 26:16	5:17	B 3:10	Board's 5:23 6:10 7:2,9 19:24	11:10 12:21 16:8,9 23:24
abolishes 9:14	afternoon 4:3	answers 19:14	bad 20:16	both 7:18 8:23 10:19 11:20 18:12 25:1	clarifying 13:23 18:7
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