

ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF: )  
 REASONABLY AVAILABLE CONTROL ) R11-23  
 TECHNOLOGIES (RACT) FOR VOLATILE ) (Rulemaking-  
 ORGANIC MATERIAL EMISSIONS FROM ) Air  
 GROUP II AND GROUP IV CONSUMER )  
 AND COMMERCIAL PRODUCTS: )  
 PROPOSED AMENDMENTS TO 35 ILL. )  
 ADM. CODE 211, 218 AND 219 )

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STATE OF ILLINOIS  
Pollution Control Board

REPORT OF THE PROCEEDINGS held in the  
 above entitled cause before Hearing Officer Tim  
 Fox, called by the Illinois Pollution Control  
 Board, taken by Steven Brickey, CSR, for the State  
 of Illinois, 100 West Randolph Street, Chicago,  
 Illinois, on the 18th day of May, 2011, commencing  
 at the hour of 9:15 a.m.

A P P E A R A N C E S

MR. TIM FOX, Hearing Officer  
MR. ANAND RAO,  
MS. ANDREA MOORE

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
(217) 782-5544

BY: MS. DANA VETTERHOFFER  
MR. YOGINDER MAHAJAN

ALSO PRESENT: MR. SCOTT TOWNSEND  
MS. LISA FREDE

REPORTED BY:

Steven J. Brickey, CSR  
CSR License No. 084-004675

1 MR. FOX: Good morning and welcome  
2 to this Illinois Pollution Control Board hearing.  
3 My name is Tim Fix and I'm the Hearing Officer for  
4 this proceeding, which is entitled, quote,  
5 Reasonably Available Control Technology, or RACT,  
6 For Volatile Organic Material Emissions From Group  
7 II and Group IV Consumer and Commercial Products.  
8 Proposed Amendments to 35 Ill. Adm. Code 211, 218  
9 and 219.

10 Also present today from the  
11 Board at my immediate left is Board Member Andrea  
12 Moore, the lead member in this rulemaking docket  
13 and to my right Anand Rao of the board's technical  
14 staff.

15 The docket number for this rule  
16 making is R11-23. On March 7th, 2011, the  
17 Illinois Environmental Protection Agency filed  
18 this proposal under the FAST track rulemaking  
19 provision at Section 28.5 of the Environmental  
20 Protection Act. The Board accepted the proposal  
21 for hearing in an order dated March 17th, 2011. I  
22 do want to note that on April 25th, 2011, the  
23 Agency filed a motion to amend its rulemaking  
24 proposal. As that motion was directed

1 specifically to the Board, there will not be a  
2 ruling on that motion here today.

3 This is, of course, the second  
4 hearing in this rulemaking. Under Section  
5 28.5(f)1 of the Act, the Board received one  
6 request to hold this hearing as it had been  
7 scheduled. That was filed on May 3rd, 2011, by  
8 Mr. James Sell on behalf of the American Coatings  
9 Association. Under Section 28.5(f)2 of the Act,  
10 the second hearing, quote, shall be devoted to  
11 presentation of testimony, documents and comments  
12 by affected entities and all other interested  
13 parties, close quote.

14 Under Section 28.5(f) of the  
15 Act, the Board must require written submission of  
16 testimony at least ten days before a hearing and  
17 on May 6th, 2011, the Board received pre-filed  
18 testimony for this hearing from Mr. James Sell of  
19 the American Coatings Association also under  
20 Section 28.5(f) in order to further expedite the  
21 hearings pre-submitted testimony shall be accepted  
22 into the record without reading and we will  
23 proceed on that basis.

24 What we will begin with this

1 morning is the pre-filed testimony on behalf of  
2 the Coatings Association, or ACA, which will be  
3 followed by questions based upon it by the Agency  
4 or by the Board.

5           Before beginning this hearing, I  
6 did place just inside the door a sheet on which  
7 people who did not pre-file testimony may indicate  
8 their interest or willingness to do so. I can see  
9 clearly that no person has signed that sheet  
10 indicating that they wish to testify so that it  
11 does appear we will be limited to the pre-filed  
12 testimony on behalf of the Coatings Association.

13           As time permits after conclusion  
14 of any testimony and questions, participants may  
15 offer public comment if they wish to do so.  
16 General speaking, this proceeding is governed by  
17 Section 28.5 of the Act and the Board's procedural  
18 rule so that all information that is relevant that  
19 is not repetitious or privileged will be admitted  
20 into the record.

21           Please note that any questions  
22 by the Board's staff or Board member are intended  
23 solely to develop a clear and complete record and  
24 not to reveal any prejudgment of the proposal.

1 Are there any questions on procedure before we get  
2 underway? Very good. Ms. Frede, on behalf of the  
3 Coatings Association, has indicated that she  
4 wished to go off the record for just a moment to  
5 confer with the witness who has just arrived. Why  
6 don't we go off the record for a moment and, Ms.  
7 Frede, you may take some time.

8 (Whereupon, a break was taken  
9 after which the following  
10 proceedings were had.)

11 MR. FOX: All right. We're set to  
12 go back on the record. Very good. We have  
13 resumed on the record here and we are prepared to  
14 turn to the pre-filed testimony on behalf of the  
15 Coatings Association. That will be on the basis  
16 of its pre-filing entered into the record as if  
17 read.

18 Ms. Frede, if you or  
19 Mr. Townsend would like to begin with a brief  
20 summary or introduction, we could start on that  
21 note and then turn to questions fairly quickly.  
22 Does that sound agreeable?

23 MS. FREDE: Works for me.

24 MR. FOX: Very good. Why don't we

1 have the court reporter swear in Mr. Townsend and  
2 we'll get underway.

3 WHEREUPON:

4 SCOTT TOWNSEND

5 called as a witness herein, having been first duly  
6 sworn, deposeth and saith as follows:

7 MR. FOX: Mr. Townsend, thanks for  
8 your appearance here this morning. Why don't we  
9 turn to any opening statement or introduction that  
10 you'd like to make.

11 MR. TOWNSEND: Sure. I appreciate  
12 the time to confirm testimony on the RACT's  
13 rulemaking regulation.

14 First, I'd like to introduce  
15 myself. My name is Scott Townsend. I'm the vice  
16 president of sales for International Paints, which  
17 is a division of AkzoNobel. The company is based  
18 out of Union, New Jersey, and it represents two  
19 brands that this regulation has bearing on; the  
20 Interlux brands and the Awlgrip brand. Both of  
21 which are undisputed world leaders in the yacht  
22 professional coatings sector. Within the pleasure  
23 craft industry, there are many different companies  
24 and the reputation for Interlux and Awlgrip has

1 always been one of universal trust and respect.

2 The reputation has been built  
3 upon consistent technical innovation, stringent  
4 quality controls and superlative finishes in both  
5 brands which have long represented the standard  
6 within all of our industries and measures.

7 I'm here today on behalf of  
8 Mr. James Sell, Senior Counsel from the American  
9 Coatings Association and, certainly, Mr. Sell  
10 apologizes for not being here today personally.  
11 Within regards of the testimony that was  
12 submitted, we would like to talk specifically on  
13 South Coast Rule 1106 as RACT for the coatings  
14 pleasure industry. In the final CTG for  
15 miscellaneous metal and plastic parts, in  
16 connection with the Illinois proposal to adopt the  
17 pleasure craft proposal, we have five concerns  
18 going forward about the current suggestion by  
19 federal EPA. The draft EPA of CTG did not mention  
20 pleasure craft surface coatings operations. When  
21 EPA introduced the language of the South Coast Air  
22 Quality Management Division Rule 1106 pleasure  
23 craft coatings operations into final EPA CTG, this  
24 was apparently done with concern that pleasure



1 craft surface coatings operations might otherwise  
2 be subject to the various general categories and  
3 more restrictive VOC limits for miscellaneous  
4 metal and plastic parts based under 1107 and 1125  
5 and miscellaneous plastic parts based on 1145 and  
6 Michigan Rule 336.1632.

7                   However, there was no  
8 opportunity for the pleasure craft industry at the  
9 federal level to provide comments on this EPA  
10 action. Had that opportunity been extended, the  
11 pleasure craft industry would have provided the  
12 following reasons to support our contention that  
13 Rule 1106 does not represent RACT.

14                   The VOC limits in Rule 1106  
15 currently are too restrictive to allow coatings  
16 manufacturers to formulate products that meet VOC  
17 limits while also meeting customer's esthetic  
18 requirements and maintaining adequate technical  
19 performance. As a result, the pleasure craft  
20 manufacturers relocated from the South Coast area  
21 to other locations in the United States in past  
22 years.

23                   Second, the compliance dates in  
24 Rule 1106-1 and EPA CTG do not provide sufficient

1 time for the coatings manufacturer to formulate  
2 products that comply with restrictive VOC limits  
3 while also meeting the technical performance and  
4 esthetic requirements of the pleasure craft  
5 manufacturers and owners.

6 An example is antifouling  
7 coatings which must be registered as biocidal  
8 products under the Federal Insecticide, Fungicide  
9 and Rodenticide Act, known as FIFRA, and  
10 corresponding state programs. This process can  
11 add years to the actual development and  
12 performance testing of the newer and lower VOC  
13 antifouling coatings.

14 What we'd like to submit as  
15 testimony as well is an example of this. What  
16 I'll pass around, if I may, is a coating that is  
17 currently used to inhibit marine growth both in  
18 fresh water and salt water. On the left-hand  
19 side -- depending on how it's oriented, on the  
20 left-hand side you're looking at the current  
21 formulation, which is available, which is about  
22 the RACT regulation proposed by EPA. On the  
23 right-hand side is the best attainable technology  
24 right now and what you can see is the difference

1 in the texture of the coating.

2 One thing we want to make sure  
3 of is we understand the scrutiny of the owners  
4 that own pleasure crafts in the United States is  
5 pretty high and one of the difficulties is to  
6 provide a coating that not only performs  
7 esthetically, but also performs and creates the  
8 antifouling performance.

9 MR. RAO: May I interrupt for just a  
10 minute?

11 MR. TOWNSEND: Sure.

12 MR. RAO: On this sample that you've  
13 provided, the one side with the rough texture, is  
14 that the compliant coating?

15 MR. TOWNSEND: That is a compliant  
16 version of it. Yes, that's a water based  
17 compliant coating.

18 MR. RAO: Okay. So you'd like the  
19 product to be how it is on the left side?

20 MR. TOWNSEND: Yes.

21 MR. RAO: You have indicated a mark  
22 that is number one coat on the top and two coats  
23 on the bottom?

24 MR. TOWNSEND: Correct.

1 MR. RAO: So what does that mean?

2 MR. TOWNSEND: There's actually two  
3 coats on the bottom of that panel and it's a draw  
4 down. It's a standard testing procedure draw down  
5 for coatings applications.

6 MR. RAO: Okay.

7 MR. FOX: Mr. Townsend, you've  
8 indicated that you would like to introduce this as  
9 a hearing exhibit. Shall I construe that as a  
10 motion to do so?

11 MR. TOWNSEND: Please.

12 MR. FOX: Very good. Is there any  
13 objection on the part of any of the participants  
14 who are present? Neither seeing nor hearing any,  
15 it will be marked as Hearing Exhibit No. 3 and it  
16 is so admitted. Mr. Townsend, please go ahead.

17 MR. TOWNSEND: Excellent. Thank  
18 you. Furthermore, on the panel that's being  
19 submitted. Currently within Illinois' waterways,  
20 there is roughly 30,000 boaters that are using  
21 this coating currently to date. We've been  
22 changing dramatically the application techniques,  
23 the procedures and ultimately the esthetic value  
24 of the coating application.

1 MR. RAO: Using the coating on the  
2 left-hand side?

3 MR. TOWNSEND: The left-hand side.

4 MS. MOORE: Can you mark them A or B  
5 or something?

6 MR. RAO: This is called solvent  
7 based coating, right?

8 MR. TOWNSEND: The actual brand name  
9 of that product is VC 17.

10 MR. RAO: Okay. It's marked VC 17  
11 and on the right side is the water based coating?

12 MR. TOWNSEND: Correct.

13 MR. RAO: Okay. Thank you.

14 MR. TOWNSEND: Point number three is  
15 that Rule 1106, like other South Coast rules, was  
16 developed and adopted to deal with severe ozone  
17 non-attainment conditions in the South Coast Air  
18 Basin. These conditions are not experienced in  
19 other areas of California and in the US in the  
20 provision of the South Coast regulation should not  
21 be identified as RACT for other areas.

22 Even in the State of California,  
23 only five other air districts have found the need  
24 to introduce the rules to regulate pleasure craft

1 surface coatings operations. These rules differ  
2 from 1106 in varying degrees and point number  
3 five. Currently, Rule 1106 was adopted in 1992.  
4 Since then, there have been significant  
5 developments in marine and pleasure craft industry  
6 to provide the basis for revised VOC regulations  
7 for some coatings categories and the introduction  
8 of new categories and VOC limits for other  
9 coatings.

10 An example of this is  
11 antifouling sealer/tie coat to allow for the use  
12 of non-biocidal coatings that comply with Annex 1  
13 of IMO, or International Marine Organization,  
14 antifouling system convention, which was written  
15 into law in 2001.

16 Finally, the development of RACT  
17 that is appropriate for the pleasure craft  
18 coatings operation should address the following  
19 points. We should look at considering an  
20 averaging approach as an alternative for  
21 compliance operations. This approach has been  
22 successfully used in Europe to provide flexibility  
23 to the coatings manufacturer and ultimately the  
24 end user within each state or district to provide

1 VOC emission reductions while minimizing adverse  
2 economic and productivity impacts on each affected  
3 facility.

4           Second, provide appropriate time  
5 until the final compliance date to allow the  
6 development, testing and commercial introduction  
7 of low VOC pleasure craft coatings. Rushing  
8 products to the market has the potential for  
9 disastrous consequences because both boat builders  
10 and pleasure craft owners tend to be very  
11 conservative and they choose their coatings which  
12 demonstrate the best performance, protection and  
13 value for their investment.

14           A period of four years is  
15 suggested to allow completion of existing  
16 development projects to bring lower VOC pleasure  
17 craft coatings to the US market and, third, revise  
18 the categories in the VOC limits in the CTG to  
19 address the current and future product  
20 developments in the pleasure craft industry.

21           Examples include revised VOC  
22 limits for several coatings categories, a revised  
23 definition for extreme high gloss topcoats and an  
24 introduction of a new category definition in VOC

1 limit for antifouling sealer/tie coat coatings.

2 The EPA CTG should be consistent  
3 with other EPA rulemakings for this industry  
4 sector. The pleasure craft industry is aware of  
5 EPA, is currently evaluating the National  
6 Emissions Standard For Hazardous Air Pollutants,  
7 or NESHAP's, for shipbuilding and ship repair  
8 operations.

9 Under 40 CFR Part 63 Subpart 2,  
10 this process may result in revised Subpart 2 of  
11 the MACT standard and/or a new Air Source Standard  
12 for HAP's emissions from pleasure craft coatings  
13 operations. Coatings manufacturers have already  
14 provided product information to EPA to assist in  
15 this process and the industry supports rulemaking  
16 that will provide a consistent approach to reduce  
17 emissions in both VOC and HAP's in the industrial  
18 sector.

19 The EPA has indicated that they  
20 are reviewing the pleasure craft provision of the  
21 EPA CTG. In response to the industry concern  
22 regarding the pleasure craft provisions of the EPA  
23 CTG, EPA has held a number of internal meetings to  
24 discuss the CTG. We understand the EPA is



1 developing guidance to the regional offices and  
2 state and local agencies on this issue and this  
3 guidance will be forthcoming in the near future  
4 and, finally, the pleasure craft industry is ready  
5 and willing to work with federal, state and local  
6 air agencies on this issue.

7           The pleasure craft industry was  
8 not afforded the usual opportunity that was  
9 consistent with EPA during the development of  
10 EPA's CTG regulations. We, therefore, feel it is  
11 imperative to work with EPA and Illinois EPA to  
12 develop RACT rules that provide reduction in VOC  
13 emissions while meeting the performance and  
14 productivity requirements of an important US  
15 industry that is under increasing pressure from  
16 economic conditions and global competition. Thank  
17 you for your attention.

18           MR. FOX: Thank you, Mr. Townsend.  
19 I do have a quick question for you.

20           MR. TOWNSEND: Sure.

21           MR. FOX: On May 16th of 2011, in  
22 this proceeding, the IEPA, represented, of course,  
23 here today, filed post hearing comments a  
24 substantial part of which pages ten on has -- that

1 comment has addressed itself specifically to the  
2 pre-filed testimony of the Coatings Association.  
3 Is that a document recently -- very recently  
4 filed, of course, that you've had a chance to see  
5 and review?

6 MR. TOWNSEND: Yes.

7 MR. FOX: Very good. Have you  
8 developed at the Coatings Association any position  
9 on the amendments to its original proposal that  
10 the IEPA has offered in that comment filed on  
11 Monday, the 16th?

12 MS. FREDE: I don't believe so.

13 MR. FOX: Can I ask this? We will  
14 have a comment period of 14 days after the  
15 availability of the transcript which was my reason  
16 for asking about the expected delivery date of  
17 that document. Can the Coatings Association file  
18 a post hearing comment specifically addressing the  
19 changes that the Agency proposed?

20 MR. TOWNSEND: Yes.

21 MR. FOX: Very good. They have  
22 itemized it and addressed specifically many of the  
23 things that your summary and introduction here  
24 today addressed and it would be very helpful to

1 the Board to know the specific position on the  
2 amendments that they have proposed to their  
3 original March proposal.

4 MR. TOWNSEND: I'll have a formal,  
5 written --

6 MR. FOX: Thank you very much,  
7 Mr. Townsend. I appreciate that. I think you  
8 suggested that you finished your introductory  
9 remarks. Are you prepared to take any questions,  
10 Mr. Townsend?

11 MR. TOWNSEND: Yes.

12 MR. FOX: Very good. Why don't I  
13 make that opportunity available first to the  
14 Agency. Ms. Vetterhoffer, if you or Mr. Mahajan  
15 have any questions, please feel free to go ahead.

16 MS. VETTERHOFFER: Thank you.

17 MR. FOX: Surely.

18 MS. VETTERHOFFER: I'm sorry. I did  
19 not catch your last name.

20 MR. TOWNSEND: Sorry. Townsend.  
21 Scott Townsend.

22 MS. VETTERHOFFER: Mr. Townsend, you  
23 haven't had a chance to review the Agency's post  
24 hearing comment, but the Agency doesn't have a

1 formal position on them?

2 MR. TOWNSEND: Correct.

3 MS. VETTERHOFFER: I would just like  
4 to add to what Mr. Fox is indicating about formal  
5 comments on our changes. Are you aware that this  
6 rulemaking is intended to address deficiencies in  
7 Illinois' RACT rule for Group II and Group IV  
8 consumer commercial products identified by the US  
9 EPA so any changes that we make to the rule need  
10 to be approved by US EPA so we can ensure we won't  
11 be here again in the year after they disapprove  
12 our rule, is that your understanding or are you  
13 aware of that situation?

14 MR. TOWNSEND: I'm not specifically  
15 aware of that situation.

16 MS. VETTERHOFFER: So I guess my  
17 question is -- first, and I've spoken to Jim Sell,  
18 but I don't know if he transferred this  
19 information to you.

20 MS. MOORE: I'm sorry. Dana, could  
21 you speak up a little bit?

22 MS. VETTERHOFFER: Sure. I spoke to  
23 Jim Sell, but I don't know if he communicated with  
24 Mr. Townsend. The one issue that is not addressed

1 in the Agency's post hearing comments not resolved  
2 is the ACA's proposed definition revisions to the  
3 definition of pretreatment wash primer and that's  
4 because US EPA hasn't approved that change, they  
5 requested additional information about it, about  
6 how the revisions will affect the VOC emissions.

7 So as I spoke with Mr. Sell  
8 about it, could the ACA provide additional  
9 information to the Agency to then pass along to  
10 the US EPA addressing US EPA's request about --  
11 I've spoken to US EPA twice and their request is  
12 simply how the revision will practically impact  
13 VOM emissions? And as Mr. Fox pointed out,  
14 there's only a couple weeks in order to get the  
15 information, submit it to US EPA, get approval or  
16 talk with them about the submittal or the Agency  
17 or for the ACA to act on that with the filing of  
18 the Board.

19 So is that something that you  
20 think you could submit and I hate to say it, but  
21 within like the next few business days?

22 MS. FREDE: Sure. We can get you  
23 that.

24 MS. VETTERHOFFER: Thank you. I

1 think on the last -- unless the ACA has some sort  
2 of comments on the proposed revisions, we will  
3 just wait until your submitted response to our  
4 submissions. We might have follow ups and we  
5 might have responsive comments as well to those,  
6 but at this point I don't think we have anything  
7 further unless Mr. Mahajan has anything.

8 MR. RAO: I just have one question  
9 and this is based on the IEPA's comments and maybe  
10 it's more directed to the Agency than  
11 Mr. Townsend.

12 In response to US EPA's  
13 requests, I think in Section 218.187 on page three  
14 of your comment you note that US EPA has advised  
15 the revision is acceptable provided that the  
16 language clarifies that the sources must  
17 demonstrate that the vapor pressure fall below the  
18 specified threshold. I just want to get some  
19 clarification for the record as to what this  
20 demonstration entails.

21 MS. VETTERHOFFER: The US EPA wasn't  
22 clear about what the demonstration will entail.

23 MR. TOWNSEND: Yes.

24 MR. RAO: I don't know if

1 Mr. Mahajan is prepared to answer that question  
2 because it's a group two question.

3 MR. FOX: Is that perhaps,  
4 Ms. Vetterhoffer, another topic for the Agency to  
5 address in a post hearing comment before the  
6 deadline in approximately 15 days?

7 MS. VETTERHOFFER: Yes, that's fine.

8 MR. FOX: Very good. I think that  
9 would be helpful and I'm sorry to have interrupted  
10 the exchange between you and Mr. Rao, but please,  
11 Mr. Rao, continue if you have anything further.

12 MR. RAO: Yes. I wanted to add  
13 something more. So you have added this  
14 demonstration in the new language on page three of  
15 your comments and to be consistent with this  
16 change I think similar language has been added to  
17 existing rules also under Section 218.411 and if  
18 you could take a look at that and also see if were  
19 not regulated what they're supposed to do to  
20 demonstrate that this cleaning solutions and the  
21 vapor pressure are less than the ten millimeters  
22 of mercury.

23 So I just wanted to make sure  
24 entities that are regulated with other sections

1 where changes were not proposed are aware of this  
2 new demonstration that is being required after.

3 MS. VETTERHOFFER: That's something  
4 we will add in our post hearing as well.

5 MR. RAO: That's it.

6 MR. FOX: Very good. I had a few  
7 questions and these are procedural in nature,  
8 Ms. Vetterhoffer, so that I think they can be  
9 posed to you perfectly fairly without swearing in  
10 Mr. Mahajan although we can do that if that's  
11 necessary and that relates to some follow up on  
12 issues raised in the Agency's post hearing  
13 comment. Specifically, those proposals offered by  
14 the Agency that pertain to the comments of the  
15 Printing Industry and Specialty Graphic Imaging  
16 Association. You had referred to two issues on  
17 which you are awaiting some further discussion and  
18 hopefully some agreement on a proposal. Is that  
19 something that we can ask you to address in the  
20 post hearing comments that we've referred to?

21 MS. VETTERHOFFER: Yes.

22 MR. FOX: Thank you very much and I  
23 also want to draw your attention to a very  
24 recently filed public comment filed, in fact, just



1 yesterday on the 17th from the Boeing Corporation.  
2 I believe I've named that entity at least roughly  
3 correctly. I understand that it was filed less  
4 than 24 hours ago. May I ask the Agency also to  
5 respond to that in a post hearing comment so that  
6 we can have the benefit of an Agency position on  
7 their request for an amendment?

8 MS. VETTERHOFFER: Yes.

9 MR. FOX: Thank you very much.  
10 That's very much appreciated. And I had one  
11 further question, again, perhaps that is best  
12 addressed in that post hearing comment. The  
13 Agency has proposed in that document filed earlier  
14 this week on the 16th to add a category and an  
15 emission limit for antifouler -- forgive me.  
16 Strike that. Antifoulant sealer/tie coat. I may  
17 have overlooked, I readily admit, but did not see  
18 a definition of that and if the Agency could also  
19 respond with any position on whether a definition  
20 would be beneficial and, if so, whether the Agency  
21 has any objection to the definition that the  
22 Coatings Association proposed in Mr. Sell's  
23 pre-filed testimony?

24 MS. VETTERHOFFER: Yes.

1 MR. FOX: I appreciate that,  
2 Ms. Vetterhoffer. I know that's a number of  
3 questions to have you respond to very quickly and  
4 I know that the Board members in particular  
5 appreciate it. Mr. Townsend, let me just make  
6 available one more time your responses -- does the  
7 Agency have any questions they wish to pose to  
8 Mr. Townsend?

9 MS. VETTERHOFFER: No.

10 MR. FOX: Very good. I think the  
11 Board member and Board staff have exhausted  
12 theirs. Why don't we go off the record very  
13 quickly and address a procedural issue and come  
14 back on the record in a moment or two.

15 (Whereupon, a break was taken  
16 after which the following  
17 proceedings were had.)

18 MR. FOX: We are back on the record.  
19 We took just a moment to address a procedural  
20 question and have resolved that satisfactorily. I  
21 do want to note that under Section 27(b) of the  
22 Environmental Protection Act, the Board must  
23 request that the Department of Commerce and  
24 Economic Opportunity conduct an economic impact

1 study of proposed rules before the Board adopts  
2 them. The Board then must make either the study  
3 or the Department's explanation for not conducting  
4 one available to the public at least 20 days  
5 before the public hearing. We did address this at  
6 the first hearing, but I want to make the  
7 opportunity available again.

8                   The Board on March 17th, through  
9 its acting Chairman Dr. G. Tanner Girard did  
10 specifically request that DCEO conduct a study.  
11 The Board specifically requested a response no  
12 later than April 6th, but DCEO had not at that  
13 time and still has not responded to the Board's  
14 request. Is there anyone that would like to  
15 testify regarding to that request and a lack of  
16 response for DCEO? Neither seeing nor hearing  
17 any, why don't we move along to the issue of the  
18 third hearing in this proceeding.

19                   It was scheduled -- I'm sorry.  
20 I'll take this out of order. Mr. Townsend had  
21 made available copies of his testimony offered  
22 here today.

23                   Mr. Townsend, may I construe  
24 that as a motion to introduce that into the record

1 as Hearing Exhibit No. 4?

2 MR. TOWNSEND: Yes.

3 MR. FOX: Is there any objection to  
4 the admission of Mr. Townsend's testimony as  
5 Hearing Exhibit 4? Neither seeing nor hearing  
6 any, it will be marked as that, Mr. Townsend, and  
7 thank you for providing that for us.

8 Let me move on in just one  
9 moment to that third hearing I began referring to.  
10 It is now scheduled to take place on Wednesday,  
11 June 1st in Chicago with a deadline of Friday, May  
12 20th, 2011, to pre-trial testimony for it. Under  
13 Section 28.5(f)3, that third hearing, quote, shall  
14 be devoted solely to any Agency response to  
15 material submitted at the second hearing and to  
16 any response by other parties. The third hearing  
17 shall be canceled if the Agency indicates to the  
18 Board that it does not intend to introduce any  
19 additional material, close quote.

20 Does the Agency wish on the  
21 record to address the issue of the scheduled third  
22 hearing?

23 MS. VETTERHOFFER: No, not right  
24 now.

1 MR. FOX: Very well. Thank you,  
2 Ms. Vetterhoffer. Since the third hearing has not  
3 been canceled, I do want to note that expedited  
4 copies of the transcript of today's hearing are  
5 expected by tomorrow, May 19th, perhaps earlier  
6 even later today. Once the Board receives a copy  
7 of that transcript, it will post it to the clerk's  
8 office online, or COOL, and it will be available  
9 through the Board's website.

10 My request to the Agency,  
11 Ms. Vetterhoffer, would be this. If you do wish  
12 under Section 28.5(f)3 of the Act to cancel the  
13 third hearing, that you would do so by the end of  
14 the day on Friday, May 20th, which is, of course,  
15 the deadline for pre-filed testimony so that the  
16 Board either would have the pre-filed testimony  
17 indicating that the Agency did wish to proceed  
18 with its third hearing or, alternatively, a  
19 statement that it wished to cancel that hearing,  
20 is that agreeable to the Agency as a way to  
21 proceed?

22 MS. VETTERHOFFER: Yes.

23 MR. FOX: Very good. I appreciate  
24 your flexibility on that. Once we receive either

1 a filing in the form of pre-filed testimony or a  
2 request to cancel the hearing, I will make sure  
3 that the Board posts that to COOL as quickly as  
4 possible so that all of the participants can have  
5 that information as quickly as possible.

6 Section 28.5(k) of the Act  
7 provides that after the hearings, the Board must  
8 close the record 14 days after the availability of  
9 the transcript. Since that third hearing may yet  
10 take place, I will not set a deadline for filing  
11 most hearing comments. However, in the event that  
12 the Agency does cancel the third hearing, I will  
13 issue a Hearing Officer order so that all will  
14 know when that comment period formally begins and  
15 formally ends. Because of the deadlines imposed  
16 on the Board by Section 28.5, that order will  
17 indicate that the, quote, mailbox rule, unquote,  
18 at Section 101.300(b)2 of the Board's procedural  
19 rules will not apply to filing those comments. So  
20 that they must be received by the Board's clerk on  
21 or before that deadline.

22 Furthermore, post hearing  
23 comments may be filed electronically through COOL  
24 and questions about that process will certainly be

1 readily handled by our clerk's office and I would  
2 ask in filing comments that you do consult the  
3 clerk's office to determine that you've got the  
4 most current list -- the most current service list  
5 for the service of that document.

6 I do want to note that under  
7 Section 28.5(n) in the event that we do not hold  
8 the third hearing, the second notice of opinion  
9 and order is due no later than 130 days after the  
10 Board's receipt of the original proposal in March  
11 and I believe that that deadline would fall on  
12 Friday, July 15th of 2011.

13 Do we have any questions about  
14 the procedural aspects of this rulemaking?  
15 Neither seeing nor hearing any, I want to thank  
16 all of you for your participation and for your  
17 time this morning and we will adjourn and wait for  
18 the Agency's word on whether they would like us to  
19 proceed with the third hearing. Thanks very much  
20 everyone.

21

22

23

24

1 STATE OF ILLINOIS )  
2 ) SS.  
3 COUNTY OF COOK )  
4

5 I, Steven Brickey, Certified Shorthand  
6 Reporter, do hereby certify that I reported in  
7 shorthand the proceedings had at the trial  
8 aforesaid, and that the foregoing is a true,  
9 complete and correct transcript of the proceedings  
10 of said trial as appears from my stenographic  
11 notes so taken and transcribed under my personal  
12 direction.

13 Witness my official signature in and for  
14 Cook County, Illinois, on this 18<sup>th</sup> day of  
15 May, A.D., 2010.  
16  
17  
18  
19

20 Steven Brickey  
21 STEVEN BRICKEY, CSR  
22 8 West Monroe Street  
23 Suite 2007  
24 Chicago, Illinois 60603  
Phone: (312) 419-9292  
CSR No. 084-004675



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