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ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF: )  
 )  
PETITION OF CROMWELL-PHOENIX, ) AS 03-05  
INC., FOR AN ADJUSTED STANDARD )  
FROM 35 ILL. ADM CODE 218.204(c) )

ADJUSTED STANDARD - AIR

TRANSCRIPT OF PROCEEDINGS held  
in the hearing of the above-entitled matter,  
taken stenographically by Stacy L. Lulias, CSR,  
before BRADLEY P. HALLORAN, hearing officer,  
at 100 West Randolph Street, Suite 11-500,  
Room 11-512, Chicago, Illinois, on the 7th day of  
August, A.D., 2003, scheduled to commence at 1:30  
p.m., commencing at 1:32 p.m.

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

2

ILLINOIS POLLUTION CONTROL BOARD,  
100 West Randolph Street  
Suite 11-500  
Chicago, Illinois 60601  
(312) 814-8917

5 BY: Mr. Bradley P. Halloran, Hearing Officer  
Mr. Nicholas J. Melas, Board Member  
6 Ms. Alisa Liu, P.E.  
Ms. Amy C. Antioniolli

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SEYFARTH SHAW,  
55 East Monroe Street  
Suite 4200  
Chicago, Illinois 60603  
(312) 346-8000  
BY: MR. ERIC E. BOYD

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Appeared on behalf of the Petitioner,  
Cromwell-Phoenix, Inc.;

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

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16

BY: MR. CHARLES E. MATOESIAN

17

Appeared on behalf of the Illinois  
Environmental Protection Agency.

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1                   HEARING OFFICER HALLORAN: Good  
2 afternoon, everyone. My name is Bradley Halloran.  
3 I'm a hearing officer with the Illinois Pollution  
4 Control Board. I've been assigned to preside over  
5 this matter.

6                   This is a hearing in the matter of  
7 the petition of Cromwell-Phoenix, Inc., for an  
8 adjusted standard from 35 Illinois Administrative  
9 Code 218.204(c). The corresponding Board number is  
10 Adjusted Standard 03-5.

11                   Today is Thursday, August 7th,  
12 2003. It's approximately 1:32 p.m. I note from the  
13 side of the parties and representatives, there are  
14 not any members of the public here; however, there  
15 are people from the Board here, and to my left is  
16 the esteemed member Mr. Nicholas Melas, who's  
17 present today, and we have staff attorney Amy  
18 Antonioli, and we also have Alisa Liu from our  
19 technical unit.

20                   This hearing was scheduled and  
21 noticed pursuant to Section 104.400, Subpart D, in  
22 the Board's procedural rules. It will be governed  
23 in accordance with Section 101-600 in the Board's  
24 procedural rules.

1 I also want to note that this  
2 hearing is intended to develop a record for review  
3 by the seven members of the Illinois Pollution  
4 Control Board. I will not be making the ultimate  
5 decision in the case. That is left up to the seven  
6 members.

7 They will review the transcript of  
8 this proceeding in the remainder of the record and  
9 will render a decision. My job is to ensure an  
10 orderly hearing and a clear record and to rule on  
11 any evidentiary matters that may arise.

12 After the hearing, the parties  
13 have an opportunity to submit posthearing briefs and  
14 I also will schedule a public comment period.

15 With that said, Mr. Boyd, would  
16 you like to introduce yourself?

17 MR. BOYD: Yes.

18 I'm Eric Boyd of Seyfarth Shaw for  
19 the Petitioner, Cromwell-Phoenix, Inc.

20 HEARING OFFICER HALLORAN: Mr.  
21 Matoesian?

22 MR. MATOESIAN: Charles Matoesian with  
23 the Illinois Environmental Protection Agency.

24 HEARING OFFICER HALLORAN: And I think

1 what will happen here today, we do not have any  
2 witnesses today. Mr. Boyd will give kind of a  
3 summary of the petition in his, I guess, opening  
4 and closing. He will submit posthearing briefs.  
5 Mr. Matoesian may or may not contribute.

6                                   And after that is through,  
7 Ms. Liu will ask some questions into the record  
8 which will be addressed by the respective parties or  
9 Mr. Boyd's experts in the posthearing briefs. Also,  
10 Amy may have some questions as well as Member Melas  
11 as we proceed.

12                                   So if there's no questions,  
13 Mr. Boyd, you can remain seated and do your thing.

14                                   MR. BOYD: Thank you.

15                                   Cromwell-Phoenix is requesting an  
16 adjusted standard from the volatile organic  
17 material, or VOM, limits in the Board's paper  
18 coating regulations of 35 Ill. Admin. Code Section  
19 218.204(c).

20                                   The company filed a petition for  
21 an adjusted standard with the Board on May 29, 2003.  
22 The petition contained the information required by  
23 35 Ill. Admin. Code Section 104.406, including a  
24 technical report prepared by Environmental Resources

1 Management, Inc., as Exhibit A, and an affidavit of  
2 Francis Houlihan, the president of Cromwell-Pheonix,  
3 as Exhibit B.

4                   On June 19, 2003, the Board  
5 entered an order finding that the petition met the  
6 content requirements of Section 104.406 of the  
7 Board's procedural rules, and that the notice met  
8 the requirements of Sections 28.1 of the Illinois  
9 Environmental Protection Act and Section 104.408 of  
10 the Board's procedural rules.

11                   On July 14, 2003, the IEPA  
12 recommended that the Board grant Cromwell-Phoenix an  
13 adjusted standard subject to the terms and  
14 conditions contained in the recommendation.

15                   The company has decided to rely on  
16 its petition and the exhibits included with the  
17 petition. These documents are presented here as  
18 Petitioner's Exhibit 1.

19                   The Agency has previously  
20 stipulated to the admissibility of these documents.  
21 We will not be calling any witnesses or introducing  
22 any other documents at today's hearing.

23                   In order to set the stage for the  
24 Board, however, I will provide a short statement.

1 The statement is based on information contained in  
2 the petition and the petition exhibits.

3                   Cromwell-Phoenix produces  
4 corrosion inhibiting, or CI, packaging material at  
5 its facility in Alsip, Illinois. The CI packaging  
6 materials are used by the metal parts industry to  
7 keep their parts from corroding.

8                   The company produces CI packaging  
9 materials by impregnating kraft paper with corrosion  
10 inhibiting solutions. The carrier for the solutions  
11 is comprised of high molecular weight, VOM and  
12 water.

13                   The purpose of the carrier is to  
14 transport the CI compounds into the paper where they  
15 are retained and ultimately released to the  
16 customer's wrapped metal parts over a prolonged  
17 period of time. The VOM contents of the carrier  
18 solution are themselves corrosion inhibitors and  
19 also facilitate the gradual migration of other  
20 corrosion inhibiting solids present in the CI  
21 packaging products toward the surface of the  
22 customer's wrapped metal parts.

23                   Due to the stability and the low  
24 volatility of the impregnated CI components, the CI

1 packaging materials have a shelf life of up to five  
2 years.

3                   As a result of this basic product  
4 functionality, Cromwell-Phoenix has economic and  
5 product performance incentives to ensure that the  
6 VOM components are retained in the product and not  
7 emitted at the Alsip facility. In fact, the only  
8 regulating emissions from the production of the CI  
9 packaging materials at the Alsip facility are  
10 relatively low emissions of VOM. The VOM emissions  
11 are low by design. The company selects impregnation  
12 coating and carrier constituents based upon their  
13 ability to be retained in the CI product.

14                   The vapor pressures of the VOM  
15 components are very low, and therefore, their  
16 evaporation is minimal. The vast majority of the  
17 company's products are produced without using  
18 dryers. The finished CI packaging material is  
19 rewound on a cylindrical core immediately after the  
20 CI solutions are applied, thereby physically  
21 encapsulating the product and further impeding the  
22 volatilization of the VOM components.

23                   As a result, the actual annual VOM  
24 emissions at the Alsip facility are typically only



1 around five to six tons per year, and the maximum  
2 potential VOM emissions from the facility are less  
3 than 25 tons per year.

4                   Despite the low annual emissions  
5 of VOM, the as-applied VOM content, less water, of  
6 the CI solutions is greater than the limitation for  
7 paper coating located at 35 Ill. Admin. Code  
8 Part 218, Subpart F.

9                   Cromwell-Phoenix has attempted to  
10 develop a CI solution reformulation that would  
11 reduce the as-applied VOM content, less water, to  
12 the greatest practicable, while still providing  
13 sufficient solids dissolution, retention and  
14 migration.

15                   Reformulation, however, requires  
16 the substitution of the water for some of the VOM.  
17 Water is not conducive to the corrosion inhibiting  
18 properties of the CI packaging materials.

19                   First and foremost, the presence  
20 of residual water in the CI products promotes  
21 corrosion of the customer's metal parts. Excess  
22 water also causes unacceptable expansion of the  
23 paper fibers resulting in the CI paper product  
24 becoming wrinkled and welted, as well as the cut

1 sheets becoming curled. This makes the paper very  
2 difficult to handle and results in the inability to  
3 achieve a good wrap on the metal items that are  
4 being protected by the CI packaging material.

5                   Increased use of water in the CI  
6 solutions also leads to greater emissions. When CI  
7 solution formulations with greater amounts of water  
8 are used, infrared drying is required to drive off  
9 the excess water. Drying not only requires  
10 additional energy consumption, is also increases VOM  
11 emissions. The drying drives off VOM as well as  
12 water. As such, any attempts to meet the pound per  
13 gallon VOM content limit in 35 Ill. Admin. Code,  
14 Part 218.104(c) would result in greater VOM  
15 emissions from the Alsip facility, not fewer.

16                   Cromwell-Phoenix has estimated  
17 that its VOM emissions using compliant coatings, if  
18 such use were possible, would result in VOM  
19 emissions much greater than those associated with  
20 the current formulations raising actual annual  
21 emissions from approximately five to six tons per  
22 year to approximately 39 tons per year or more.

23                   Cromwell-Phoenix also investigated  
24 the feasibility of add-on controls. The 35 Ill.

1 Admin. Code, Part 218, Subpart F coating regulations  
2 require that either the VOM content of a coating be  
3 below certain levels or that add-on controls be  
4 applied.

5                   The only technically feasible  
6 control options that were identified by  
7 Environmental Resources Management, the company's  
8 outside consultant, were oxidation and a combination  
9 carbon adsorption/oxidation system. The cost per  
10 ton of VOM control for each of these options,  
11 however, is well above the level that would be  
12 considered reasonable under a conventional  
13 reasonably available control technology, or RACT,  
14 demonstration. These costs are outlined in the  
15 ERM report.

16                   As Mr. Houlihan's affidavit  
17 attests, Cromwell-Phoenix cannot afford the initial  
18 capital outlay or the annual operating costs  
19 associated with these add-on controls.  
20 Cromwell-Phoenix needs the requested adjusted  
21 standard in order to continue to manufacture CI  
22 packaging materials at the Alsip facility.

23                   The facility currently employs 31  
24 people. By the end of this year, Cromwell-Phoenix

1 hopes to conclude a merger with another company that  
2 would lead to additional CI packaging material  
3 business at the Alsip facility, as well as new jobs  
4 and increased revenues for the state.

5 Cromwell-Phoenix believes it is the only  
6 manufacturer of CI packaging materials in Illinois.

7                                 In summary, Cromwell-Phoenix finds  
8 itself in a classic Catch-22 situation. As the  
9 petition describes, the Board's paper coating  
10 limitation was based on coatings for which the VOM  
11 content is emitted during the application, drying  
12 and curing steps, not retained in the coated  
13 product.

14                                 Cromwell-Phoenix cannot currently  
15 use coatings that comply with the paper coating  
16 limit of 35 Ill. Admin. Code, Part 218, Subpart F,  
17 and still make its corrosion inhibiting packaging  
18 materials. Using lower VOM materials would actually  
19 increase VOM emissions from the Alsip facility, not  
20 decrease them.

21                                 In addition, the available control  
22 technologies will result in only nominal VOM  
23 reductions as a cost that is prohibitive. For all  
24 these reasons, as more fully outlined in

1 Petitioner's Exhibit 1, Cromwell-Phoenix  
2 respectfully states that an adjusted standard is  
3 warranted under the factors set forth in Section  
4 28.1 of the Act and asks the Board to grant its  
5 adjusted standard request.

6 HEARING OFFICER HALLORAN: Thank you,  
7 Mr. Boyd.

8 So you're going to ask for this  
9 Petitioner's Exhibit Number 1 to be put into  
10 evidence?

11 MR. BOYD: Yes, I'll do that now.

12 HEARING OFFICER HALLORAN: Any  
13 objection, Mr. Matoesian?

14 MR. MATOESIAN: No objection.

15 HEARING OFFICER HALLORAN: It's  
16 granted. Petitioner's Exhibit Number 1 is admitted  
17 into evidence.

18 Mr. Matoesian?

19 MR. MATOESIAN: Thank you, sir.

20 Just briefly, Charles Matoesian  
21 for the Illinois EPA. We filed a recommendation on  
22 July 14th pursuant to 35 Ill. Admin. Code Section  
23 104.416. And in that recommendation we recommended  
24 that the Board grant the petition. We still stand

1 by that. And I would simply submit a copy of our  
2 recommendation into the record and stand on it.

3 That's all.

4 HEARING OFFICER HALLORAN: Any  
5 objection, Mr. Boyd?

6 MR. BOYD: Not at all.

7 HEARING OFFICER HALLORAN: I'll  
8 entitle it as Hearing Officer Exhibit 1, and it is  
9 admitted into evidence.

10 MR. MATOESIAN: Thank you.

11 HEARING OFFICER HALLORAN: Thank you.  
12 There's nothing further.

13 Mr. Melas, do you have any  
14 questions yet or would you like Ms. Liu to ask  
15 hers?

16 BOARD MEMBER MELAS: Nothing.

17 HEARING OFFICER HALLORAN: And then  
18 these questions, again, are basically going to be  
19 read into the record so they can be addressed during  
20 posthearing briefs. However, Mr. Boyd is free to  
21 answer, if he's able, at this time.

22 MS. LIU: Good afternoon, Mr. Boyd.

23 We'd like to pose some questions  
24 to your Petitioner to help clarify the petition as

1 well as to make a complete record.

2 MR. BOYD: Okay.

3 MS. LIU: The Petitioner, on page 17,  
4 refers to some experiments that were conducted,  
5 reformulate CI coatings and installation of add-on  
6 controls. There's some detailed information  
7 concerning the evaluation of the add-on controls,  
8 but there is no data documenting the experiments  
9 that were conducted on the reformulated coatings.

10 I was wondering if you could  
11 please provide some information on those experiments  
12 and the results of their testing?

13 MR. BOYD: Ms. Liu, could you tell me  
14 exactly where on page 17 you're referring, just so  
15 I'm clear?

16 MS. LIU: Looks like paragraph B.

17 The sentence is, "The compliance  
18 alternatives investigated include experiments with  
19 reformulated CI coatings and the installation of  
20 add-on controls."

21 MR. BOYD: I'm not sure whether  
22 there's an actual report based on those experiments  
23 or if it's just described in the petition, but I'll  
24 find out and let you know.

1 MS. LIU: Appreciate that.

2 In the petition on page four,  
3 Cromwell mentions that it may be the only  
4 manufacturer of CI packaging material in Illinois.

5 Could you please comment on  
6 whether or not Cromwell is aware of other CI  
7 packaging manufacturers in other states that are  
8 subject to similar VOM emission control  
9 requirements?

10 MR. BOYD: I'm not able to at this  
11 time, but I will ask our consultant and our client  
12 and we'll address that in the posthearing brief.

13 MS. LIU: And if so, could you follow  
14 up with whether or not Cromwell is aware of how  
15 those other facilities comply with those applicable  
16 VOM limitations that they have in their states?

17 MR. BOYD: I will, if we're able to.

18 MS. LIU: I understand.

19 This is an easy one. The petition  
20 does not include a street number for Cromwell's  
21 Alsip facility. It refers to Ridgeway Avenue.  
22 Could you please provide a more precise address,  
23 please?

24 MR. BOYD: Certainly.



1 MS. LIU: Also, on page four of the  
2 petition, it states that Cromwell started CI  
3 packaging operations in 2001.

4 The building has been around since  
5 1965, and we were wondering if that same Alsip  
6 facility was being used for manufacturing CI  
7 products prior to Cromwell taking over operations?  
8 And if so, is Cromwell or the Agency aware of any  
9 information of the compliance status of the facility  
10 if it was doing that kind of operation before 2001?

11 MR. BOYD: My understanding is that it  
12 was not used for CI material manufacturing, but I'll  
13 confirm that.

14 MS. LIU: In the petition on page six,  
15 it states that Cromwell had performed gravimetric  
16 tests to determine the weight loss in emissions from  
17 CI packaging production processes.

18 It was stated that the gravimetric  
19 demonstrated the overall VOM emissions are less than  
20 five percent of the weight of the CI solution  
21 applied, could you possibly provide the gravimetric  
22 test data, including the results, that demonstrates  
23 that five percent?

24 MR. BOYD: Certainly.

1                   That information was provided to  
2 the IEPA in a Clean Air Act permit program permit  
3 application. That was not submitted as part of the  
4 adjusted standard, but we can make it an exhibit and  
5 we'll provide it to the Board.

6                   MS. LIU: Thank you.

7                   Could you also, along those lines,  
8 provide some information on the amount of different  
9 types of CI coatings used on an annual basis along  
10 with their VOM content? If there are some trade  
11 secrets involved, perhaps just the gallons per year  
12 along with associated VOM content.

13                  MR. BOYD: I'm sure that information  
14 is in the application, and we'll provide -- we can  
15 provide both a trade secret and a non-trade secret  
16 copy for you. I don't think there will be a problem  
17 with that.

18                  MS. LIU: In Cromwell's motion for an  
19 expedited review, the Petitioner indicates that  
20 there's going to be a proposed merger with this  
21 other company and that that will result in an  
22 increase in production of CI packaging, and the  
23 motion states the facility will still be a minor  
24 source.

1                   Given Cromwell's earlier  
2 pre-merger estimates of five to six tons of VOM per  
3 year from the CI process, could you please provide  
4 an estimate of the anticipated increase?

5                   MR. BOYD: We sure can. We don't  
6 really know at this point in time. That's one of  
7 the reasons it's not been provided to this date. So  
8 if it's possible by the time we submit our  
9 information, we'll let you know.

10                   On a related note, we're  
11 aware that the adjusted standard would be for  
12 Cromwell-Phoenix. We are not clear yet whether the  
13 merge entity will be Cromwell-Phoenix or another  
14 entity, so we are also aware that we'll have to go  
15 back to the Board and say, we'd like this new  
16 entity, if there is one, to be named the recipient  
17 of the adjusted standard. We aren't at that point  
18 yet. If we are, then I'll get you that information  
19 too.

20                   MS. LIU: Not being a lawyer, I was  
21 slightly confused about one portion of your  
22 petition.

23                   MR. BOYD: Okay.

24                   MS. LIU: On page two, Cromwell

1 notes that, "Because it prints on the majority of  
2 its products before applying the corrosion  
3 inhibiting solutions, it's printing/coating  
4 operations are regulated by 35 Illinois  
5 Administrative Code, Subpart H, 218.401."

6                                 In the section from which Cromwell  
7 seeks the adjusted standard, which is 218.204(c),  
8 there is a note that says that the paper coating  
9 VOM limit does not apply to sources regulated under  
10 218.401, so I was wondering if you could clarify  
11 whether the requested relief from the adjusted  
12 standard pertains only to the CI packaging materials  
13 that you don't print on, or if you meant it to apply  
14 to all of your CI packaging materials whether you  
15 printed on them or not?

16                                 MR. BOYD: I think I can clarify that  
17 now.

18                                 MS. LIU: Okay.

19                                 MR. BOYD: The adjusted standard  
20 applies to the CI packaging materials solutions. It  
21 does not apply to the printing that may go on the  
22 kraft paper prior to the use of the CI solutions.

23                                 In other words, there are -- you  
24 know, there's a printing -- printing something on

1 the packaging materials before they are coated,  
2 before they're impregnated with this CI solution.

3 To my knowledge, there is no  
4 problem meeting the requirements for the printing  
5 regulations of 35 Ill. Admin. Code, Subpart H,  
6 218.401. The only issue is the fact that the  
7 VOM content of the CI coating material is higher  
8 than the paper coating standard.

9 MS. LIU: So you view them as separate  
10 processes, printing regulated by one set of the  
11 regulations and the coating by another?

12 MR. BOYD: I don't have the rules in  
13 front of me, but my understanding is that note that  
14 you're referring to, in essence, suggests that if  
15 you're meeting the coating -- if you're really  
16 coating instead of printing and you're meeting the  
17 coating rules, then that Subpart H rule doesn't  
18 apply.

19 We're not even arguing now that  
20 the printing they do on those is really coating. It  
21 is printing, and they're meeting the printing  
22 regulations.

23 MS. LIU: If you don't mind, does the  
24 Agency agree with that interpretation?

1                   MR. MATOESIAN: We'll respond to that  
2 in the brief.

3                   MS. LIU: Thank you.

4                   I was wondering if you could also  
5 explain the rationale for limiting the VOM content  
6 of the CI coatings to 8.3 pounds per gallon in your  
7 adjusted standard wording?

8                   MR. BOYD: Because that's what they're  
9 using now, so we don't want to have a backsliding or  
10 anything like that. We want to be clear what  
11 they're using now and that what we're using now is  
12 sufficient under the adjusted standard.

13                  MS. LIU: In the proposed language for  
14 the adjusted standard, it would require that  
15 Cromwell report all annual emissions to the Illinois  
16 Environmental Protection Agency, could you please  
17 clarify whether this requirement pertains to all  
18 emissions of VOM at the facility or all air  
19 emissions in general? It might be something that  
20 you might want to insert in the wording so that  
21 you're only gearing this adjusted standard to the  
22 VOM emissions rather than other emissions that your  
23 client might have that might be regulated.

24                  MR. BOYD: Well, if you look -- is it

1 paragraph seven that you're talking about where it  
2 says, Cromwell shall continue to report all annual  
3 emissions to the IEPA?

4 MS. LIU: Yes.

5 MR. BOYD: Well, that is a -- there's  
6 an obligation under the Board's rules and the  
7 Agency's rules to file annual emissions reports, and  
8 they'll continue to do that, in the annual emissions  
9 report, include information about VOM emissions from  
10 the facility. So I think the annual emissions  
11 reports you're talking about there are the currently  
12 required reports that -- they're not anything new or  
13 special in terms of an annual emissions report  
14 relating to this adjusted standard.

15 If you'd like, you can clarify  
16 it by adding the section of the regulation which  
17 requires the annual emissions report.

18 MS. LIU: I just didn't want, for some  
19 reason, this adjusted standard to become too  
20 onerous.

21 MR. BOYD: Neither do we.

22 MS. LIU: In the Agency's  
23 recommendation on pages five and six, the Agency  
24 proposes conditions to the adjusted standard very

1 similar to the one that Cromwell had crafted for  
2 itself, with the exception of one additional  
3 condition. The Agency proposed limiting the  
4 adjusted standard to equipment in emission sources  
5 that were in place as of July 14th of 2003 and which  
6 were identified in that Clear Air Act permit program  
7 application.

8 Does Cromwell find this added  
9 condition acceptable given the proposed merger?

10 MR. BOYD: Yes, it does.

11 As I said, at this point in time,  
12 it certainly does.

13 MS. LIU: So you won't be adding new  
14 equipment or --

15 MR. BOYD: The current plan is not to  
16 do that.

17 Let me just rephrase that.

18 There are no current plans to do  
19 that, I should say. I'm not sure there is a  
20 current plan.

21 MS. LIU: On page 14 of the petition,  
22 Cromwell states that if the requested relief is not  
23 granted, it will have to control 15.21 tons of VOM  
24 per year.



1 I was wondering if you could  
2 explain how the potential VOM reduction of 15.21  
3 tons per year was calculated?

4 MR. BOYD: I think I can. And again,  
5 this is really clarified in the Title V permit  
6 application.

7 My understanding is that the  
8 15.21 tons per year are the theoretical maximum  
9 emissions of VOM from the corrosion inhibiting  
10 products portion of this Alsip facility. So that  
11 the total potential emissions of VOM for that  
12 portion of the facility are 15.21 tons per year.  
13 That's, again, the potential emissions, not actually  
14 emissions, which are much lower.

15 They used the 15.21 ton number for  
16 purposes of the RACT demonstration to show that even  
17 if we're emitting, you know, as much as it  
18 potentially could emit, the cost per ton of control  
19 for the oxidizer or the combined system addressed by  
20 ERM would still be cost prohibitive.

21 MS. LIU: Thank you.

22 Also on that page 14, Cromwell  
23 states that its operation is a "relatively small  
24 contribution to the local air shed when compared to

1 the hundreds of thousands of tons of VOM emitted  
2 each year in the Chicagoland non-attainment area."

3                   Could you please calculate the  
4 impact of those VOM emissions from the Alsip  
5 facility in terms of the overall emissions from the  
6 Chicago non-attainment area if the Board were to  
7 grant the relief?

8                   MR. BOYD: Well, we certainly could do  
9 that if the Board would like us to, but however, I'm  
10 sure it will be a fraction number, and it doesn't  
11 seem to make much sense to try to do that in this  
12 context because the overall point was a, you know,  
13 it might seem more argumentative than anything, it's  
14 just a very, very small facility, that the emissions  
15 are very small given the overall VOM emissions for  
16 the area.

17                   We can certainly try to calculate  
18 that if the Board would like us to.

19                   MS. LIU: I'm concerned the word small  
20 is kind of a subjective term --

21                   MR. BOYD: It is, and it was intended  
22 to be subjective.

23                   MS. LIU: It would be nice to see a  
24 number to demonstrate the environmental impact.



1                   HEARING OFFICER HALLORAN: We're back  
2 on the record. We've been discussing a few  
3 housekeeping matters.

4                   We've decided that the transcript  
5 will be available August 12th and be ready, and I  
6 might -- as an aside, the Board today granted  
7 Mr. Boyd's motion for expedited review and motion  
8 for expedited transcripts.

9                   So what will happen, the Board  
10 will order the expedited transcripts, and it's my  
11 understanding that the Petitioner will file or pay  
12 the difference between the regular transcript and  
13 the expedited transcript to be worked out later.

14                   With that said, the expedited  
15 transcript will be available August 12th. I'm going  
16 to set August 19th as the close of public comment;  
17 August 22nd, Petitioner's brief is due; August 29th,  
18 the Agency's brief is due; and the record closes  
19 August 29th. If need be, the Petitioner will ask  
20 for a leave to file a reply, but at this time, the  
21 record closes on August 29th.

22                   I think that's all I have, unless  
23 somebody else has any comments, issues, questions?

24                   All right. Thank you all very

1 much for coming here today and have a safe trip  
2 home.

3 (Which were all the proceedings  
4 had in the above-entitled cause  
5 on this date.)

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1 STATE OF ILLINOIS )  
 ) SS.  
2 COUNTY OF DUPAGE )

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4 I, STACY L. LULIAS, CSR, do hereby  
5 state that I am a court reporter doing business in  
6 the City of Chicago, County of DuPage, and State of  
7 Illinois; that I reported by means of machine  
8 shorthand the proceedings held in the foregoing  
9 cause, and that the foregoing is a true and correct  
10 transcript of my shorthand notes so taken as  
11 aforesaid.

12

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\_\_\_\_\_  
Stacy L. Lulias, CSR  
Notary Public,  
DuPage County, Illinois

15

16

17 SUBSCRIBED AND SWORN TO  
before me this \_\_\_ day  
18 of \_\_\_\_\_, A.D., 2003.

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\_\_\_\_\_  
Notary Public

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