

ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	
PETITION OF GREIF	)	No. AS 11-1
PACKAGING, LLC, FOR AN	)	(Adjusted Standard -
ADJUSTED STANDARD FROM	)	Air)
35 ILL. ADM. CODE 218	)	
SUBPART TT	)	

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STATE OF ILLINOIS  
Pollution Control Board

RECORD OF PROCEEDINGS had before Kari Wiedenhaupt, taken at James R. Thompson Center, Room 11-512, 100 West Randolph Street, Chicago, Illinois on Tuesday, December 20, 2011, commencing at 1:00p.m. in reference to the above-entitled cause.

1 APPEARANCES:

2 ILLINOIS POLLUTION CONTROL BOARD

3 Bradley P. Halloran - Hearing Officer

4 Anand Rao - Senior Environmental  
5 Scientist

6 Alisa Liu - Environmental Scientist

7 Jennifer Burke - Member

8 Daniel Robertson - Staff Attorney

9

10 ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

11 Yoginder Mahajan - EPA Bureau of Air

12 Charles E. Matoesian

13

14 ALSO PRESENT:

15 ICE MILLER, LLP

16 THOMAS W. DIMOND

17 SUSAN CHARLES

18 200 WEST MADISON STREET

19 SUITE 3500

20 CHICAGO, IL 60606

21 (312) 726-7146

22 Representing Greif.

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I N D E X

WITNESS EXAMINATION

THOMAS C. PONDER

By THOMAS C. DIMOND 17

KHAALIS D. RAHMAN

By THOMAS C. DIMOND 21

E X H I B I T S

NUMBER MARKED FOR ID

Petitioner's Exhibit

No. 1 18

No. 2 19

No. 3 20

E X H I B I T S

NUMBER ADMITTED INTO EVIDENCE

Petitioner's Exhibit

Nos. 1-3 21

## 1 REPORT OF PROCEEDINGS

2 TUESDAY, DECEMBER 20, 2011

3 MR. HALLORAN: Hi. Good afternoon. My name  
4 is Bradley Halloran. I am a hearing officer  
5 with the Illinois Pollution Control Board. I am  
6 also assigned to this matter. It's entitled, in  
7 the matter of: Petition of Greif, Inc. and  
8 Greif Packaging, LLC, for an adjusted standard  
9 from 35 Illinois Administrative Code Part 218,  
10 Subpart TT. It's an adjusted standard. Our  
11 docket is 2011-001; again, adjusted standard,  
12 and it's for air.

13 Today is Tuesday, December 20th, 2011.  
14 It's approximately 1:00 p.m. I note except for  
15 some of the representatives from our office,  
16 there are no members of the public present.  
17 This hearing of today is being held pursuant to  
18 Section 104.400, Subpart D of the Board's  
19 procedural rules regarding adjusted standards.

20 The hearing will be governed in  
21 accordance with the Illinois Environmental  
22 Protection Act, the Board's procedural rules;  
23 specifically Section 101, Subpart F, and it has  
24 been noticed up appropriately.

1 I note that this hearing is intended to  
2 develop a record for review by the entire Board.  
3 I'm not going to make the final decision in this  
4 matter. It's up to the five esteemed members of  
5 the Pollution Control Board. They will take a  
6 look at the record, the transcript, and any  
7 post-hearing briefs, exhibits and then make  
8 their decision.

9 Before we go any further, there is a  
10 procedural matter I think we should note for the  
11 record. In response to questions earlier posed  
12 by our technical staff, petitioner filed an  
13 application for treatment as non-disclosable  
14 information pursuant to Section 130.406 of the  
15 Board's procedural rules. And this is in  
16 regards to answers to our questions.

17 To that end, the application itself  
18 will be taken with the case, and the information  
19 sought to remain confidential will not be  
20 divulged during this hearing.

21 I also want to introduce members of our  
22 Pollution Control Board. We have member,  
23 Jennifer Burke, here. We have our scientists  
24 Anand Roa and Alisa Liu, who will be doing a

1 good portion of the questions. We also have  
2 Daniel Robertson, a staff attorney.

3 With that said, Mr. Dimond, would you  
4 like to introduce yourself?

5 MR. DIMOND: Certainly. I'm Tom Dimond from  
6 Ice Miller representing Greif, and I'm  
7 accompanied here today by my colleague, Sue  
8 Charles, and Tom Ponder, our technical expert,  
9 and Khaalis Rahman, who is the plant manager for  
10 the Naperville Plant.

11 MR. HALLORAN: Thank you. Greif. I always  
12 pronounce that incorrectly, thanks.

13 Mr. Matoesian?

14 MR. MATOESIAN: My name is Charles Matoesian  
15 appearing for the Illinois Environmental  
16 Protection Agency, and here with me to answer  
17 any questions is Yoginder Mahajan, who is an  
18 Environmental Protection Engineer.

19 MR. HALLORAN: Thank you. And again, Mr.  
20 Dimond, you introduced Ms. Charles, right? I'm  
21 sorry.

22 MS. CHARLES: Yes.

23 MR. HALLORAN: Okay. Thank you. Do you want  
24 to give a brief opening?

1 (Whereupon, a discussion was had  
2 off the record.)

3 MR. HALLORAN: All right. Mr. Dimond, did  
4 you want to give an opening, please?

5 MR. DIMOND: Thank you. I do have an opening  
6 statement, Mr. Hearing Officer.

7 First of all, I would like to thank the  
8 Board for its time and effort on this Adjusted  
9 Standard Petition. We would also like to thank  
10 Mr. Matoesian and the numerous Illinois EPA  
11 staff who reviewed our proposal. They offered  
12 good, constructive comments on it so that it  
13 could ultimately -- that they could recommend  
14 that it be granted.

15 They were also very helpful in  
16 facilitating early discussions with U.S. EPA to  
17 address their concerns, because I think as  
18 anyone who is familiar with the filings in the  
19 case is aware, ultimately if the Board approves  
20 the adjusted standard, it will be submitted as a  
21 SIP Revision to EPA. So we appreciate all the  
22 effort that Illinois EPA has put into that.

23 I would like to summarize the context  
24 and the proposal set forth in the Second Amended

1 Adjusted Standard Petition. As background,  
2 Greif's plant in Naperville is a fiber drum  
3 manufacturing plant. It employs approximately  
4 90 people. It is a synthetic minor source for  
5 volatile organic material emissions or what we  
6 may sometimes abbreviate as VOM. And it has a  
7 federally enforceable state operating permit,  
8 which we will frequently refer to as a FESOP  
9 that makes it a synthetic minor source for the  
10 VOM materials.

11 In general, the process of  
12 manufacturing fiber drums is pretty  
13 straightforward. You have a sheet of corrugated  
14 fiber drum or fibers. You roll it into a  
15 cylindrical shape. You attach a top and a  
16 bottom, and you have got a drum. Many of the  
17 drums that are manufactured in our Naperville  
18 plant need a polyethylene liner, typically  
19 because customers either want to put a liquid or  
20 food grade product in it.

21 In the process of applying the  
22 polyethylene to the inside of the fiber drum,  
23 you can develop small imperfections in the  
24 polyethylene liner, and because of that, we need



1 to test that polyethylene liner to make sure  
2 that those imperfections have not arisen during  
3 the manufacturing process.

4 To do that we have -- the plant has  
5 what is called a QC test process, and basically  
6 it involves this. The drums are on a conveyer  
7 line, which is typical for many manufacturing  
8 plants. It goes down the line. There is a  
9 mechanical wand that is triggered to actually  
10 move down inside the drum, and it sprays a  
11 certain amount of a liquid material on the  
12 polyethylene liner on the interior of the drum.

13 And if the imperfections exist, the  
14 liquid will get through the polyethylene on to  
15 the fiber and will make spots appear on the  
16 fiber drum so that you can visually see those  
17 spots as a darker spot on the fiber drum.

18 Historically, the Naperville plant has  
19 used a 100 percent denatured alcohol as the test  
20 fluid for this test process. In 2008 -- and I  
21 should note that the denatured alcohol is a  
22 volatile organic material by definition. In  
23 2007 and 2008 the emissions from the Naperville  
24 facility were large enough on an annual basis

1 that they exceeded the threshold for coverage  
2 under the Board's Subpart TT regulations.

3 The Subpart TT regulations are a part  
4 of the Board's RACT regulations for the Chicago  
5 metro area, and in particular, Subpart TT is the  
6 subcategory for sources that are not covered by  
7 any more specific category within the RACT  
8 regulations. So it's sort of a catchall  
9 category.

10 There are two particularly relevant  
11 aspects of Subpart TT for this proceeding. One  
12 is that if you trigger the applicability, there  
13 is in general an 81 percent capture and control  
14 requirement set forth in the regulations. And  
15 the other particularly important aspect of those  
16 regulations for our purposes, is that the  
17 regulations are what are generally called in the  
18 industry, once in always in regulations.

19 So if you trip the applicability  
20 threshold once, you are in, and in general, you  
21 can't get out. So those are two particularly  
22 important aspects of those regulations.

23 As I mentioned, in 2007 and 2008 the  
24 Naperville plant did exceed that threshold, and

1 so it triggered the applicability of the Subpart  
2 TT. There are two or three aspects of the  
3 operations at Naperville that make complying  
4 with Subpart TT difficult.

5           Installing control equipment is  
6 difficult in part because of the nature of the  
7 characteristics of the denatured alcohol and in  
8 part because of the configuration of the test  
9 process. The denatured alcohol itself  
10 evaporates relatively slowly, and so it's not as  
11 if when you are on the production line and the  
12 drums are moving along on the conveyer belt that  
13 all the emissions will occur at a single point.

14           They will begin to occur as soon as the  
15 liquid is sprayed inside the drum, but as the  
16 drum continues down the conveyor line to the  
17 spot on the line where the visual inspection for  
18 the imperfections actually occurs, that takes  
19 about 40 seconds, and I think it's about 40 feet  
20 or so. We have got that number in the petition.  
21 And then even after they are inspected, those  
22 drums continue to be conveyed on a conveyor line  
23 eventually to a drying oven that, you know,  
24 heats up the material inside the drum trying to

1 get more evaporation.

2           And then even after the drying of it,  
3 in some instances employees have to get in --  
4 well, they have to reach their arm inside the  
5 drum with a towel and dry out the remaining test  
6 fluids. So it's a slow evaporating material,  
7 and that means that if we were going to capture  
8 all the VOM emissions, we would have to have  
9 tunnel like structures that go around the  
10 conveyor belts. We would also have to leave  
11 some spot for the visual inspection to occur,  
12 because the employees actually have to be able  
13 to get up next to the drum to be able to see the  
14 imperfections.

15           And for the -- you know, for the  
16 purposes of trying to achieve an 81 percent  
17 capture and control, it means that you have got  
18 to capture a lot of air. That, in turn, means  
19 that you have to build a fairly -- a larger size  
20 piece of control equipment, and with larger size  
21 in your control equipment comes added cost. So  
22 those are factors that make capturing the  
23 emissions and achieving 81 percent capture and  
24 control rather difficult for our kind of

1 facility.

2 As we were addressing this issue with  
3 the Agency, we recognized that we would need to  
4 do a RACT study as is commonly done when  
5 adjusted standards are due, done or when someone  
6 seeks an adjusted standard from a RACT  
7 regulation. We asked Mr. Ponder to prepare that  
8 for us, and he did, and that was attached to our  
9 first petition that we filed I want to say in  
10 January of 2011.

11 Essentially the RACT study looked at  
12 three different post emission control  
13 alternatives and looked at two what I would call  
14 materials substitution options. The three  
15 back-end control options -- one was a  
16 recuperative thermal oxidizer, second was a  
17 carbon absorber, and the third was a bio-filter.

18 And Mr. Ponder looked at those and  
19 estimated a cost per ton of VOM reduced that  
20 ranged between 11,667 and \$17,672 per ton. Each  
21 of those alternatives had some drawbacks  
22 associated with them as well. Those are details  
23 in the RACT study, and I'm not going to go over  
24 them here, but those are addressed in the

1 details of the RACT study.

2 As I mentioned, we also looked at two  
3 material substitution alternatives. One was to  
4 replace the denatured alcohol with a test fluid  
5 that is not a volatile organic material. The  
6 material that we looked at there was acetone,  
7 which while it's a volatile organic, it's not a  
8 volatile organic material under the Clean Air  
9 Act.

10 We tested that and found that it had a  
11 problem. When you are sealing up a fiber drum,  
12 you have to put a gasket at the bottom of the  
13 drum so that you have a tight seal between the  
14 bottom and the drum and the cylinder that goes  
15 on top of it. The acetone unfortunately causes  
16 that gasket material to degrade, and that's  
17 just -- you know, if you have got a drum that  
18 leaks at the bottom, that's not really a drum  
19 that any of our customers want to buy.

20 So we tested the acetone. That did not  
21 work. The other material substitution option we  
22 looked at was diluting the denatured alcohol  
23 with water. We tested that at a variety of  
24 different combinations. I think we went as high

1 as either 60 or 70 percent water content. That  
2 detail is in our Adjusted Standard Petition and  
3 in the RACT study itself.

4 What we found is that when we went that  
5 low, you -- it did not cause spots to develop on  
6 the drum in sufficient time that our workers  
7 could identify it visually on the conveyor line.  
8 You -- you know, it takes about 40 seconds for  
9 the drums to get to the spot in the line before  
10 they go into the oven. So you need to be able  
11 to detect the imperfections by then.

12 What we did is we set up a test where  
13 we intentionally created imperfections in some  
14 drums. We sprayed the test fluid in at  
15 different dilution levels and ultimately found  
16 that at about a 55 percent water, 45 percent  
17 denatured alcohol -- and that's not by volume  
18 but by weight -- there we could still detect the  
19 imperfections, but if we put more than  
20 55 percent water in, we were not able to detect  
21 the imperfections in sufficient time.

22 And the RACT study concludes that for  
23 this -- for this process, we concluded that the  
24 Board should consider that RACT. Based on the

1 information that I have summarized here today  
2 and that is explained in more detail in the RACT  
3 study and in our Second Amended Petition that  
4 was filed in August, we believe that Greif has  
5 met the standards in Section 28.1 of the  
6 Illinois Environmental Protection Act for having  
7 an adjusted standard granted by the Board.

8 After the filing of our Second Amended  
9 Petition in August, we did continue to work with  
10 Illinois EPA to address concerns that either  
11 they or U.S. EPA had with the precise wording of  
12 the adjusted standard that we had put in our  
13 Second Amended Petition.

14 The Agency's recommendation that was  
15 filed in October, they had slightly different  
16 language than we had in our Second Amended  
17 Petition in August. We have reviewed the  
18 language that is in the Agency's recommendation,  
19 and we find that language satisfactory and would  
20 accept that as the Board's -- as an adjusted  
21 standard from the Board. So we are in agreement  
22 with the language that was submitted by the  
23 Agency in their recommendation.

24 In closing, again, I would like to



1     thank the Agency and the Board for their efforts  
2     to review our adjusted standard proposal. I do  
3     want to put on a couple of witnesses today. I  
4     want to put on Mr. Ponder to authenticate some  
5     of the documents in the record as exhibits, and  
6     I also would like to put on Mr. Rahman to put in  
7     some evidence regarding the confidential  
8     information that we submitted that can be taken  
9     with the case.

10             And then, of course, if Board members  
11     or their technical advisors have questions,  
12     myself and Ms. Charles, Mr. Ponder and Mr.  
13     Rahman will be here, and we will be available to  
14     answer those. Thank you.

15             MR. HALLORAN: Thank you, Mr. Dimond. You  
16     may proceed and call one of the your witnesses  
17     or both -- Mr. Ponder, I guess, first.

18             MR. DIMOND: Okay. Mr. Ponder.

19                     (Whereupon, the witness was duly  
20                     sworn.)

21                     THOMAS C. PONDER, Jr.,  
22     having been first duly sworn, was examined and  
23     testified as follows:

24                             EXAMINATION

1 BY MR. DIMOND:

2 Q. Mr. Ponder, can you please state your  
3 name for the record?

4 A. My name is Thomas C. Ponder, Jr.

5 Q. And do you have any degrees or  
6 accreditations?

7 A. I have a BS in chemical engineering  
8 from the University of Texas. I have six  
9 professional engineering licenses including  
10 Illinois, and I'm also a certified cost  
11 engineer.

12 Q. Thank you. Were you asked to prepare a  
13 study for Greif in connection with this  
14 proceeding?

15 A. Yes, I was.

16 Q. Okay. I'm going to hand you a document  
17 that I would like to have marked as Exhibit 1.

18 (Whereupon, Exhibit No. 1 was  
19 marked for identification.)

20 BY MR. DIMOND:

21 Q. Could you identify for the record what  
22 Exhibit 1 is?

23 A. It's the Reasonably Available Control  
24 Technology RACT Study for the Greif Naperville

1 facility.

2 Q. And did you prepare that?

3 A. Yes, I did.

4 Q. Okay. Thank you. That's all the  
5 questions I have got regarding that.

6 I'm now going to distribute a second  
7 document, which I would request be marked as  
8 Exhibit 2.

9 (Whereupon, Exhibit No. 2 was  
10 marked for identification.)

11 BY MR. DIMOND:

12 Q. And again, Mr. Ponder, I would ask you  
13 if you could identify what we have had marked as  
14 Exhibit 2 for the record?

15 A. This is an Air Quality Impact Analysis  
16 of the VOC emissions from the Greif Packaging  
17 facility in Naperville.

18 Q. And did you prepare that as well?

19 A. Yes, I did.

20 Q. Describe for us in -- at a high level  
21 what the -- what analysis is performed in the  
22 Air Quality Impact Analysis.

23 A. Well, this is an analysis based on the  
24 method by a gentleman named Shafe (phonetic)

1 where you compare the VOC emissions from the  
2 facility to the nitrogen oxide emissions, you  
3 get a ratio, and then based on the quantity, you  
4 determine how much impact it's going to have on  
5 the ambient ozone levels.

6 MR. DIMOND: Thank you. And then I have a  
7 third document that I would like to have marked  
8 as Exhibit 3.

9 (Whereupon, Exhibit No. 3 was  
10 marked for identification.)

11 BY MR. DIMOND:

12 Q. And again, Mr. Ponder, if you could  
13 identify what Exhibit 3 is?

14 A. Well, this is a response to some  
15 questions from the Illinois Environmental  
16 Protection Agency on the Air Quality Impact  
17 Analysis.

18 Q. Okay. And did you prepare that --  
19 those response questions to the questions as  
20 well?

21 A. Yes, I did.

22 MR. DIMOND: All right. Mr. Hearing Officer,  
23 we would request that Exhibits 1, 2 and 3 be  
24 received into the record.

1 MR. HALLORAN: Mr. Matoesian, any objection?

2 MR. MATOESIAN: None.

3 MR. HALLORAN: Petitioner's Exhibits 1, 2 and  
4 3 are admitted into evidence.

5 (Whereupon, Petitioner's Exhibit  
6 Nos. 1-3 were admitted into  
7 evidence.)

8 MR. DIMOND: And that's all the questions I  
9 have for Mr. Ponder.

10 MR. HALLORAN: Terrific. You may step down.

11 MR. DIMOND: Next, I would like to call Mr.  
12 Rahman.

13 (Whereupon, the witness was duly  
14 sworn.)

15 KHAALIS RAHMAN,  
16 having been first duly sworn, was examined and  
17 testified as follows:

18 EXAMINATION

19 BY MR. DIMOND:

20 Q. Thank you, Mr. Rahman. Can you give us  
21 your full name?

22 A. Khaalis Rahman.

23 Q. Okay. And what is your current  
24 position?

1 A. Plant manager in Naperville.

2 Q. Are you employed with Greif?

3 A. Yes.

4 Q. How long have you been employed by  
5 Greif?

6 A. About sixteen years.

7 Q. How long have you been the plant  
8 manager at Naperville?

9 A. One year and one month.

10 Q. I will note for the record, Mr.  
11 Rahman's testimony is primarily related to our  
12 Application For Treatment of Confidential  
13 Information. We did not submit an affidavit  
14 with that, and his testimony here today is meant  
15 to fill in any perceived holes in that.

16 Are you familiar with the Federally  
17 Enforceable State Operating Permit for the  
18 Naperville facility and the conditions that it  
19 places on the Naperville plant?

20 A. Yes, I am.

21 Q. Does your -- if I use the acronym  
22 FESOP, you will recognize that, correct?

23 A. Yes.

24 Q. Does the FESOP require the plant to

1 maintain data on the number of line drums  
2 produced per month or per year?

3 A. No.

4 Q. Does the FESOP require the plant to  
5 report data on the number of line drums produced  
6 per month or per year to Illinois EPA or any  
7 other regulatory agency?

8 A. No, it does not.

9 Q. Does the FESOP require the company to  
10 maintain or report data on the amount of  
11 denatured alcohol used per line drum?

12 A. No.

13 Q. Is the information on the number of  
14 line drums produced by month maintained by  
15 Greif?

16 A. Yes, it is.

17 Q. Is that information that is treated by  
18 the company as confidential information that is  
19 not disclosed outside the company?

20 A. Yes, it is.

21 Q. Is access to that information  
22 restricted to certain company employees?

23 A. Yes, it is.

24 Q. And how does the company restrict

1 access to that information?

2 A. By database form and by administrative  
3 levels and making the accessible levels by  
4 password.

5 Q. And so when you say it's in database  
6 form, you mean it's accessible through a  
7 computer terminal?

8 A. Yes.

9 Q. And so the only people who can get  
10 access to it are people who have the right  
11 password; that's correct?

12 A. And the correct administrative level.

13 Q. Thank you. If a competitor of Greif's  
14 knew the amount of denatured alcohol used per  
15 line drum, could they calculate the number of  
16 line drums produced based on Naperville's  
17 reported emissions?

18 A. Yes.

19 Q. And how could a competitor use that  
20 information to Greif's disadvantage?

21 A. Primarily by ascertaining the amount of  
22 volume that we have going to that particular  
23 market. It's a fairly closed market. We know  
24 our suppliers -- or we know our competitors who



1 supply those markets. They know the customers  
2 that we supply, and they can gain certain market  
3 information from that.

4 MR. DIMOND: All right. That's all the  
5 questions I have.

6 MR. HALLORAN: Thank you, Mr. Rahman.

7 Mr. Matoesian, anything?

8 MR. MATOESIAN: I have no questions.

9 MR. HALLORAN: Okay. We are off the record.

10 (Whereupon, a discussion was had  
11 off the record.)

12 MR. HALLORAN: All right. We are back on the  
13 record.

14 And I think -- I'm sorry. Go ahead,  
15 Mr. Dimond.

16 MR. DIMOND: Do you think he can step down?

17 MR. HALLORAN: Yes, he can step down,  
18 correct.

19 And I think what we will do -- unless  
20 anybody else has any questions at this moment, I  
21 think we will swear Mr. Matoesian and the IEPA's  
22 witness in as well. And then Ms. Liu at this  
23 point will ask questions, and I guess -- I'm not  
24 sure who it will be directed to, I assume

1 Petitioner's experts for now.

2 MS. LIU: And the IEPA.

3 MR. HALLORAN: I'm sorry?

4 MS. LIU: And the IEPA.

5 MR. HALLORAN: And the IEPA.

6 In any event, if you raise your right  
7 hand, Kari will swear you in.

8 (Whereupon, the witnesses were  
9 duly sworn.)

10 MR. HALLORAN: Just keep your voices up  
11 unless you want to move up, but Ms. Liu will  
12 commence her questioning.

13 MS. LIU: Good afternoon. The first two  
14 questions I have are directed at Greif  
15 packaging.

16 In Greif's filing from December 8th,  
17 2011, in response to Hearing Officer ordered  
18 questions served on November 8th, 2011, on Page  
19 2, Mr. Thomas Ponder states, quote, "The maximum  
20 tons of VOC usage that would need to be  
21 controlled if the facility complied with Subpart  
22 TT would be approximately 84.8 tons per year,"  
23 end quote.

24 This is the first time that Greif uses

1 this figure of 84.8 tons per year in the record.  
2 In the Second Amended Petition Greif states that  
3 it, quote, "Does not employ any equipment to  
4 capture or destroy VOM emissions," end quote.

5 Is the 84.8 tons per year figure based  
6 on the maximum line drum production before the  
7 adjusted standard initiatives are put into  
8 practice?

9 MR. PONDER: I think it is. How much solvent  
10 we would use is based on the -- the potential  
11 solvent we would use based on this production.

12 MR. DIMOND: Could you repeat the question,  
13 please, or have it read back?

14 MS. LIU: Is the 84.8 tons per year figure  
15 based on the maximum line drum production before  
16 the adjusted standard initiatives are put into  
17 practice?

18 MR. DIMOND: I think the answer to that  
19 question is no. It's a theoretical calculation  
20 of -- it's a theoretical calculation of how much  
21 VOM could be used if you were achieving  
22 reductions from that level as a post -- as a  
23 post control. The facility has never actually  
24 had that much emissions or used that much VOM.

1 It's a theoretical calculation.

2 MR. PONDER: Basically, if you use the  
3 emission level of 22.8 and divide by the control  
4 efficiency, that's how you get, the 84.8.

5 MS. LIU: So is that the maximum?

6 MR. PONDER: That's the maximum you could use  
7 if you don't -- if you limit your emissions to  
8 22.8.

9 MR. DIMOND: As it explained in the response,  
10 the way you get to the 84.8 is you take 22.8,  
11 and you divide it by  $1 - 0.731$ . So it's a  
12 theoretical calculation. The facility has never  
13 actually used that much.

14 MS. LIU: And that theoretical calculation is  
15 based on --

16 MR. PONDER: The emission limit.

17 MS. LIU: In your redacted information -- and  
18 I won't mention those numbers -- you have a  
19 maximum line to drum production number per year  
20 and an amount of solvent that is -- an amount of  
21 VOM's that are used per drum. When you multiply  
22 those two numbers, you come up with 84.8,  
23 correct?

24 MR. PONDER: I don't know that off the top of

1 my head.

2 MR. HALLORAN: You know what? I think what  
3 we are going to have to do -- if the two  
4 witnesses can sit up here, because the voices  
5 keep dropping. And I was kind of afraid of  
6 that. Sorry.

7 MS. LIU: I do have the un-redacted version.

8 MR. PONDER: Yes. Give me the un-redacted  
9 version, and I can tell you if that's the right  
10 number.

11 It comes out that way, because this is  
12 the theoretical. They don't make that many  
13 drums, but that's how many they could.

14 Yes, you get the 22.8 that way. The  
15 number that's in this redacted version, that's  
16 the maximum number of drums they could make in  
17 the facility. I don't believe it's 8760, but  
18 they can't run 8760, because there is changes in  
19 downtime and stuff like that, but that's the  
20 maximum they could make. They don't make  
21 anywhere near that many.

22 MS. LIU: Okay. But if they do, then the  
23 maximum VOM usage would be 84.8?

24 MR. PONDER: Yes, it would be.

1 MS. LIU: And then does the 84.8 ton per year  
2 figure represent the maximum potential to emit  
3 before the adjusted standard practices are  
4 initiated?

5 MR. PONDER: I believe so.

6 MS. LIU: Those are all the questions I have  
7 for you. So thank you for clearing that up.

8 MR. DIMOND: The only qualification I would  
9 make on that statement is that potential to emit  
10 as a regulatory concept is allowed to consider  
11 limitations that are placed on the facility by  
12 permit. By permit the facility has a limit of  
13 22.8 tons of emissions. Technically, I think in  
14 a potential to emit calculation made for new  
15 source review purposes, you would be allowed to  
16 take the limitation that is in the federally  
17 enforceable state operating permit and consider  
18 that to be the potential to emit for the  
19 facility; but again, if you don't consider that,  
20 then, yes, the 84.8 might be considered the  
21 maximum potential to emit.

22 MS. LIU: Thank you. Thank you, Mr. Ponder.

23 The next few questions I have are  
24 directed primarily at the Agency.

1           Mr. Ponder calculated the difference in  
2 VOM emissions between the proposed adjusted  
3 standard for a 73.1 reduction to the Subpart TT  
4 requirements for an 81 percent reduction at  
5 6.7 tons per year. Based on this Mr. Ponder  
6 calculated an ozone increment of 1.47 parts per  
7 billion.

8           Greif asserted that the granting of  
9 this petition would have minimal impact on air  
10 quality. However, the Agency stated, quote, "It  
11 should be noted that the Agency does not accept  
12 this argument on its face as almost any  
13 individual source could make the same claim, and  
14 it is the aggregate of sources in the area that  
15 causes ozone non-attainment. However, the  
16 technical factors in this instance and the  
17 emission reductions Greif has already made  
18 offset the Agency's concerns in this regard."

19           Previously in Adjusted Standard AS 09-4  
20 for a company called Royal Fiberglass, the  
21 agency stated that an increase of two parts per  
22 billion is quote, "potentially significant", end  
23 quote.

24           In this case we are looking at

1 1.47 parts per billion. My first question is,  
2 does the Agency believe that an increment of  
3 1.47 parts per billion is potentially  
4 significant?

5 MR. MATOESIAN: I think we would like to  
6 answer that in writing, if possible.

7 MS. LIU: Okay. And the second question is,  
8 does the Agency believe the granting of this  
9 proposed adjusted standard will cause or  
10 contribute to the violations of the National  
11 Ambient Air Quality Standards for ozone or delay  
12 efforts to attain the NAAQS, N-A-A-Q-S, in a  
13 timely manner?

14 MR. MATOESIAN: We can answer that in  
15 writing, too.

16 MS. LIU: I would appreciate that, thank you.

17 MR. HALLORAN: Anybody else have any  
18 questions for the witnesses at this time?

19 MR. DIMOND: None here.

20 MR. HALLORAN: All right. Let's go off the  
21 record for a minute.

22 (Whereupon, a discussion was had  
23 off the record.)

24 MR. HALLORAN: Back on the record. Mr.



1 Dimond would like to respond to one of the  
2 questions Ms. Liu posed, and you may proceed,  
3 Mr. Dimond.

4 MR. DIMOND: Sure. It's not technically a  
5 response since the questions were directed to  
6 the Agency, but in connection with the question  
7 of whether or not the incremental emissions from  
8 the Greif facility as they were calculated in  
9 the filings that were made by Greif and its  
10 representatives, as I mentioned at the  
11 beginning, if this adjusted standard is approved  
12 by the Board, it will ultimately have to be  
13 submitted to U.S. EPA as a SIP Revision.

14 In the discussion -- in the three-way  
15 discussions that occurred between Greif,  
16 Illinois EPA, and U.S. EPA, U.S. EPA raised  
17 certain concerns regarding whether or not the  
18 proposal was consistent with Section 110 of the  
19 Clean Air Act, which in general they described  
20 as an anti-backsliding provision related to SIP  
21 revisions.

22 In discussions with them, they  
23 ultimately were satisfied in that regard by the  
24 addition to the adjusted standard of an

1 additional condition. I would like to indicate  
2 for the record what it is, but I need to look at  
3 it and be sure.

4 We added -- if you will -- on this  
5 Second Amended Petition -- on Page 16 of the  
6 Second Amended Petition is where we start the  
7 adjusted standard language, and then on Page 19  
8 is Item No. 9 that sets monthly and annual  
9 limits and tons per month or tons per year for  
10 emissions from the facility.

11 Those limits are identical to what is  
12 currently in the facility's federally  
13 enforceable state operating permit. U.S. EPA  
14 considered the addition of that condition into  
15 the adjusted standard sufficient to address the  
16 Section 110 issue under the Clean Air Act, and I  
17 think that that issue is -- you know, is  
18 essentially similar to the issue of whether or  
19 not the incremental emissions from complying  
20 with the adjusted standard versus Subpart TT  
21 would be considered to delay or cause a  
22 violation of the National Ambient Air Quality  
23 Standards.

24 So I just wanted to point out for the

1 Board that that is a condition that was not in  
2 our original adjusted standard petition that was  
3 filed in January. It was in the Second Amended  
4 Petition filed in August, and that was inserted  
5 specifically to address that concern of U.S.  
6 EPA. So I just -- I thought the Board should be  
7 aware that that issue was addressed with EPA in  
8 that manner.

9 MR. HALLORAN: Thank you, Mr. Dimond.

10 Counsel has indicated that they are  
11 going to reserve their closing  
12 statements/arguments for their post-hearing  
13 brief, and while off the record, we discussed  
14 the post-hearing briefing schedule.

15 We came up with -- I think the  
16 transcript should be due by January 2nd, 2012.  
17 On January 11th, 2012, the IEPA is to respond to  
18 Ms. Liu's questions posed during this hearing.

19 Grief's opening brief is due January  
20 26th, 2012, and IEPA's response, if any, will be  
21 due February 9th, 2012. And Mr. Dimond, Greif's  
22 reply, if any, is due February 16th.

23 Mr. Matoesian has indicated that he  
24 will let me know whether or not they intend to

1 file a response on February 9th, and then I will  
2 get a written order out advising everyone of  
3 such and the Board as well.

4 I set public comment for January 17th.  
5 Did I forgot anything? I just want to thank  
6 everybody present. Thank you for your civility  
7 and professionalism, and happy holidays and  
8 happy near year.

9 (FURTHER DEPONENT SAITH NOT.)

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I, KARI WIEDENHAUPT, do hereby certify that the foregoing was reported by stenographic and mechanical means, which matter was held on the date, and at the time and place set out on the title page hereof and that the foregoing constitutes a true and accurate transcript of same.

I further certify that I am not related to any of the parties, nor am I an employee of or related to any of the attorneys representing the parties, and I have no financial interest in the outcome of this matter.

I have hereunder subscribed my hand on the 5<sup>th</sup> day of January, 2012.

Kari Wiedenhaupt

KARI WIEDENHAUPT, CSR

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