

In The Matter Of:

*Department of Natural Resources & Environmental Control
Proposing Amed to 7 DE Admin. Code 1124 Section 26 & 36*

*Public Hearing
January 8, 2020*

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DEPARTMENT OF NATURAL RESOURCES AND
ENVIRONMENTAL CONTROL

In the matter of
Proposing to Amend
7 DE Admin. Code 1124
Section 26 and
Section 36

PUBLIC HEARING

DNREC
Richardson &
Robbins Building
DNREC Auditorium
89 Kings Highway
Dover, Delaware

Wednesday
January 8, 2020
6:00 p.m.

BEFORE:

THERESA NEWMAN
The Hearing Officer

APPEARANCES:

FRANK GAO
DNREC

TRANSCRIPT OF PROCEEDINGS

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1 THE HEARING OFFICER: Good
2 evening, everyone. If you could please
3 take your seats. We're going to begin
4 tonight's hearing.

5 Please allow the record to
6 reflect it is now 6:00 p.m. on Wednesday,
7 January 8, 2020. Thank you for taking the
8 time to be here today. We are here this
9 evening to provide a formal platform for
10 the State of Delaware's Department of
11 Natural Resources and Environmental Control
12 to receive public comment on the proposed
13 regulatory amendment to 7 DE Admin.
14 Code 1124, Control of Volatile Organic
15 Compound Emissions Regulation, sections 26
16 and 36.

17 My name is Theresa Newman, and
18 Secretary Garvin has appointed me to serve
19 as the hearing officer for tonight's formal
20 proceeding.

21 There is a sign-in sheet in the
22 back of the room. For those who have not
23 signed in, I ask that you please do so, as
24 it is mandatory to have an accurate log of



1 all attendees tonight. Also, please
2 indicate on the sign-in sheet whether or
3 not you would like to provide a comment at
4 tonight's hearing. Those persons offering
5 any comment will be given an opportunity to
6 do so following the brief presentation
7 given by the Department, and those will be
8 recognized by the Hearing Officer in no
9 particular order from the sign-in sheet.

10 With regard to public comment
11 wishing to be offered tonight, there are,
12 as indicates for all DNREC public hearings,
13 formal protocols which must be adhered to
14 in tonight's hearing. Please be advised of
15 the following rules which are in place for
16 the formal proceeding:

17 Please mute and turn off all
18 cell phones for the duration of the
19 proceeding to avoid any disruption. All
20 comments must be limited solely to the
21 subject matter of tonight's hearing. Each
22 person will be granted a total of three
23 minutes to offer comment. There will be a
24 visual timer in place to help everyone be



1 aware of the time remaining while
2 commenting.

3 If you have brought written
4 comments with you tonight, I would ask that
5 you please present those to me after
6 providing your verbal comments so that the
7 same can be entered into the record. If
8 you have brought another person's written
9 comments with you and wish to speak to
10 their comments, you may do so. However,
11 that will be a part of the three-minute
12 time allotment you have with your own
13 comment as well. There will be no yielding
14 of time from one commenter to another. I
15 will ask that you respect the time of each
16 person. Please be respectful and
17 considerate of all comments offered even
18 though some comments may differ in opinion
19 from your own.

20 Also, there will be no Q-and-A
21 session permitted during the course of
22 tonight's formal proceeding. Myself and
23 DNREC staff members are present to
24 facilitate receipt of public comment and



1 not to participate in the proceedings.

2 Lastly, pursuant to the subject
3 matter of this hearing, all comments
4 pertinent to the aforementioned proposed
5 amendment will be incorporated into the
6 formal hearing record being generated in
7 this matter. There's only one authentic
8 record of the formal proceeding tonight and
9 it is the official court reporter's
10 verbatim transcript.

11 The verbatim transcript is
12 being created to memorialize tonight's
13 formal hearing by the court reporter. She
14 can only accurately hear one person's voice
15 at a time. In order to ensure accuracy of
16 the transcript, and to be mindful of the
17 above protocols with the need for order at
18 this oral proceeding, please do not speak
19 while another person is speaking, and do
20 not call out from the audience for any
21 reason.

22 It is important to note no
23 decision has already been made by the
24 Department, nor will any decision be made



1 tonight. A record consisting of the
2 transcript of verbal comments given
3 tonight, all written comments submitted
4 prior to the hearing, all exhibits, and my
5 report will be reviewed by the Secretary.
6 The Secretary will ultimately issue an
7 order containing his decision of the
8 proposed amendment and reasons therefore.

9 The hearing record generated in
10 this matter will close 15 days from
11 tonight's hearing on Thursday,
12 January 23rd, 2020. All comments, whether
13 offered verbally tonight or submitted prior
14 to January 23rd in writing, will bear the
15 exact same weight and will be considered
16 equally by the Secretary prior to making
17 his final decision in this matter.

18 With that being said, I'm going
19 to hand it over to Mr. Gao to present for
20 the Division of Air Quality.

21 MR. GAO: Thank you, Theresa.

22 First of all, thank you all for
23 coming. My name is Frank Gao, and I'm the
24 engineer from the planning branch, planning



1 section of the Division of Air Quality.

2 The purpose of this rule-making
3 action is to update the requirements
4 governing the gasoline-dispensing
5 facilities in 7 DE Admin. Code 1124,
6 Section 26, "Gasoline Dispensing Facility
7 Stage I Vapor Recovery," and Section 36,
8 "Vapor Emission Control at Gasoline
9 Dispensing Facilities."

10 We know that gasoline vapor
11 contains volatile organic compounds, or
12 VOCs, which contribute to summertime smog
13 and also contain certain air toxics. To
14 meet the requirements in the federal Clean
15 Air Act, gasoline stations in Delaware have
16 installed and operated two systems to
17 control gasoline vapor emissions for more
18 than 20 years. One system is called a
19 Stage I vapor recovery system which
20 controls gasoline vapor emissions from
21 gasoline storage tanks during tanker truck
22 gasoline delivery. Another system is
23 called a Stage II system which controls
24 gasoline vapor emissions from vehicles'



1 fuel tanks when refueling.

2 Since 1998 new vehicles in the
3 U.S. have been required by the Clean Air
4 Act to install an onboard refueling vapor
5 recovery system, ORVR. For these vehicles,
6 the gasoline vapors displaced during the
7 refueling process are controlled through
8 the vehicle's ORVR canister, not through
9 the station's Stage II system. Both
10 Stage II and ORVR systems are effective for
11 controlling gasoline vapor emissions during
12 vehicle refueling. However, the
13 vacuum-assist Stage II systems and the ORVR
14 systems are incompatible. Such
15 incompatibility causes excess vapor
16 emissions from gasoline storage tanks when
17 ORVR-equipped vehicles refuel at
18 Stage II-equipped stations, especially when
19 those gasoline storage tanks are not vapor
20 tight.

21 In May 2012 the U.S.
22 Environmental Protection Agency, or EPA,
23 determined that the ORVR systems were in
24 widespread use nationwide on



1 gasoline-powered vehicles, and EPA issued a
2 final rule to allow gasoline stations to
3 decommission Stage II systems. This final
4 rule aimed at reducing the adverse effects
5 of the functional overlap and
6 incompatibility between the vacuum-assist
7 Stage II systems at gasoline stations and
8 the ORVR systems on vehicles.

9 Since Delaware's Stage II
10 systems are all vacuum-assist systems, the
11 Division is proposing the following
12 amendments to 7 DE Admin. Code 1124:
13 First, to decommission the Stage II systems
14 installed at all Delaware's gasoline
15 stations by December 31, 2021, and, 2, to
16 install enhanced Stage I systems at
17 gasoline stations by December 21, 2025.

18 The Division is also proposing
19 to submit to EPA a revision to the Delaware
20 State Implementation Plan, or SIP,
21 entitled, "Decommissioning Stage II Vapor
22 Recovery Systems and Requiring Stage I
23 Enhanced Vapor Recovery Systems At Gasoline
24 Dispensing Facilities." The objectives of



1 the proposed SIP revision is to, 1, analyze
2 the regulatory impacts of the above
3 regulation amendments on Delaware's
4 emissions of VOCs, volatile organic
5 compounds, and, 2, demonstrate that the
6 above regulatory amendments meet the
7 anti-backsliding requirements of the
8 federal Clean Air Act, Section 122(b)(2)
9 and Section 110(1).

10 The Division initiated the
11 public involvement process for the proposed
12 amendments in April of 2019 with a series
13 of review committee meetings and public
14 workshops. The Division formed a review
15 committee to gather public input regarding
16 the proposed regulatory changes. The
17 review committee consisted of
18 representatives of the regulated community,
19 that is, gasoline station owners or
20 operators; representatives of testing
21 companies; regional organizations of
22 gasoline distribution industry;
23 environmental organizations; and regulatory
24 agencies.



1 After incorporating the
2 comments from the review committee and the
3 public workshops, the Department published
4 the proposed amendments to Section 26 and
5 Section 36 and the SIP revision on
6 December 1st, 2019, in the Delaware
7 Register of Regulations for review and
8 comment from the public.

9 The proposed amendments and the
10 SIP revision have been available for public
11 review in the Division's offices in
12 New Castle and Dover since December 1st,
13 2019. A legal notice regarding the
14 availability and publication of the
15 proposed amendments, the SIP revision, and
16 the schedule of today's hearing was
17 announced in the Sunday News Journal and
18 the Delaware State News on Sunday,
19 December 1st, 2019.

20 The Department is now
21 presenting 19 exhibits to the hearing
22 record, as provided in the exhibits
23 listing, which is also available to you on
24 the table in the back of the room.



1 This completes the Department's
2 presentation on the proposed amendments to
3 7 DE Admin. Code 1124, sections 26 and 36.

4 Thank you.

5 THE HEARING OFFICER: Mr. Gao,
6 the exhibits 1 through 19, for the record,
7 if you could read those exhibits out loud.

8 MR. GAO: Sure. Here the
9 exhibits we present to the hearing record:

10 Exhibit 1, the Start Action
11 Notice approving the planned amendments to
12 7 DE Admin. Code 1124, Section 26 and
13 Section 36.

14 Exhibit 2, the affidavits and
15 public hearing notices from the publishers
16 of the Sunday News Journal and the Delaware
17 State News for the publication of the
18 Department's legal notice on Sunday,
19 December 1st, 2019.

20 Exhibit 3, the public notice on
21 the statewide public meeting calendar, as
22 posted on December 3rd, 2019, announcing
23 the January 8, 2020, public hearing for the
24 planned amendments to 7 DE Admin. Code



1 1124, sections 26 and 36.

2 Exhibit 4, the January 7, 2020,
3 e-news update from Delaware's Office of
4 Environmental Protection announcing the
5 January 8, 2020, public hearing for the
6 planned amendments to 7 DE Admin. Code
7 1124, sections 26 and 36.

8 Exhibit 5, all documents
9 associated with the April 16, 2019, public
10 workshop.

11 Exhibit 6, all documents
12 associated with the May 8, 2019, review
13 committee.

14 Exhibit 7, all documents
15 associated with the June 12, 2019, review
16 committee.

17 Exhibit 8, all documents
18 associated with the July 17, 2019, review
19 committee.

20 Exhibit 9, all documents
21 associated with the August 21, 2019, review
22 committee.

23 Exhibit 10, all documents
24 associated with the October 15 and 16,



1 2019, public workshops.

2 Exhibit 11, the register notice
3 as published on December 1st, 2019, in the
4 Delaware Register of Regulations.

5 Exhibit 12, the proposed
6 amendments to 7 DE Admin. Code 1124,
7 Section 26, as published on December 1st,
8 2019, in Delaware Register of Regulations.

9 Exhibit 13, the proposed
10 amendments to 7 DE Admin. Code 1124,
11 Section 36, as published on December 1st,
12 2019, in the Delaware Register of
13 Regulations.

14 Exhibit 14, the regulatory
15 flexibility analysis and impact statement
16 form for the proposed amendments to 7 DE
17 Admin. Code 1124, sections 26 and 36.

18 Exhibit 15, the hearing notice
19 announcing the January 8, 2020, public
20 hearing for the planned amendments to 7 DE
21 Admin. Code 1124, as published on
22 December 1st, 2019, in the Delaware
23 Register of Regulations.

24 Exhibit 16, updated versions of



1 the California Air Resource Board's
2 executive orders and Petroleum Equipment
3 Institute's recommended practices for
4 installation and testing of vapor recovery
5 systems at vehicle fueling sites, as listed
6 in the proposed amendments to 7 DE Admin.
7 Code 1124, Section 36.

8 Exhibit 17, the proposed
9 Delaware SIP revision as published on
10 December 1st, 2019, in the Delaware
11 Register of Regulations.

12 Exhibit 18, errata table for
13 non-substantive changes to the proposed
14 amendments to 7 DE Admin. Code 1124,
15 Section 36, as published on December 1st,
16 2019, in the Delaware Register of
17 Regulations.

18 Exhibit 19, the technical
19 support document which summarizes technical
20 and cost information in relation to the
21 proposed amendments to 7 DE Admin. Code
22 1124, sections 26 and 36.

23 That's all the exhibits.

24 THE HEARING OFFICER: Great.



1 Thank you so much, Mr. Gao. Does that
2 conclude the Department's remarks?

3 MR. GAO: What's that?

4 THE HEARING OFFICER: Does that
5 conclude the Department's remarks?

6 MR. GAO: Yes.

7 THE HEARING OFFICER: Thank
8 you. Please allow the formal record to
9 reflect as identified by the Department
10 exhibits 1 through 19 have been entered
11 into the record.

12 As the Department has no
13 further remarks, I will now open it up for
14 public comment. Those of you who I will be
15 calling on please do remember, there is a
16 three-minute timer that will be set in
17 place. He will pull it up on the screen.
18 And as we get to the end of your three
19 minutes, I would like to ask that you
20 please conclude your comments. And again,
21 if there is any paper comments that you
22 would like to submit, you can do so, as
23 well as you have 15 additional days after
24 this to submit any comments.



1 I have Sandy Carl.

2 MS. CARL: Present. I just
3 want to first off thank Mr. Gao for giving
4 me the opportunity to be on this committee
5 with some wonderful people.

6 The comment that I have is I
7 was a little disappointed, after reading
8 through the proposed final language that
9 was registered, that you did not include
10 the testing comments that Prompto had made
11 in regards to the static torque testing.
12 We had expressed concerns. I know myself
13 and my counterpart in technology that were
14 concerned with the dealers not
15 understanding exactly what has to be tested
16 once the Stage II system is decommissioned.
17 And we do feel that it is best, just as
18 New Jersey DEP had done, and I had provided
19 a sample table, of how New Jersey had put
20 in place what is required to be tested once
21 the Stage II system is decommissioned. I'm
22 a little disappointed that that language
23 was not put in there. I don't understand
24 why when it could have been just a short



1 paragraph to state what needed to be done
2 to perform a static torque test. I realize
3 it's in other documentation, but I don't
4 think it's fair to the regulated community
5 who are trying to operate these stations
6 and do not understand all of the language
7 and everything that needs to be done that
8 they now have to search through multiple
9 documentation to find out exactly what
10 needs to be tested once their system is
11 decommissioned.

12 So I do hope that maybe you
13 would change your mind after today's
14 comment period that maybe you will add a
15 short paragraph to state that a static
16 torque test is required so that the
17 regulated community knows exactly what they
18 have to do, and we as a testing company are
19 not trying to provide more convoluted
20 paperwork to them, to help them to
21 understand why we're charging them for
22 additional testing that needs to be
23 completed.

24 Thank you very much.



1 THE HEARING OFFICER: Thank
2 you.

3 Next we have Josh Worth.

4 MR. WORTH: Is it better to go
5 up?

6 THE HEARING OFFICER: You can
7 do it right there or you can come up. It's
8 up to you.

9 MR. WORTH: My name is
10 Josh Worth, and I am with the environmental
11 department at Wawa Food Markets. Prior to
12 Wawa I was with the board of Pure Air
13 Quality with the Pennsylvania Department of
14 Environmental Protection, specializing in
15 Stage I and Stage II vapor recovery.

16 As an air quality specialist, I
17 am always for the reduction of VOCs, but
18 DNREC's requirement for complete CARB
19 phase 1 enhancement recovery system
20 overreaches, with no guaranteed improvement
21 in air quality. There is a huge financial
22 amount with no corresponding benefit.

23 We have asked the Division of
24 Air Quality for a cost-benefit analysis of



1 the new requirements, but we never received
2 one. Most state and federal regulatory
3 changes require a cost-benefit analysis to
4 specify the financial impact versus the
5 environmental benefit. This is done for
6 accountability and transparency.

7 Requiring a CARB phase 1 EVR
8 system will cost tank owners from \$35,00 to
9 \$50,000 to replace their current system,
10 plus the impact on sales by having to shut
11 down for an extended period of time while
12 the tank field is excavated. There are
13 also costs to require sampling and testing,
14 as well as costs to preparing permit
15 applications for this retrofit work.

16 CARB stands for the California
17 Air Resources Board. As the EPA used to
18 look to California for Stage II
19 requirements and not a team in areas
20 throughout the country, but they stopped
21 once Stage II became unnecessary and
22 incompatible with ORVR in vehicles.

23 Why is Delaware attempting to
24 adopt California's requirements when



1 California still uses Stage II. With
2 Stage II the gasoline vapors that are being
3 returned to the tanks causes
4 overpressurization and subsequent releases
5 of gasoline vapors to the atmosphere. A
6 system without Stage II works under a
7 vacuum and in a vapor-tight system.

8 Requiring CARB phase 1 EVR
9 systems significantly overreaches with huge
10 financial impacts but very limited
11 environmental benefit. They could require
12 certain EVR components without requiring a
13 station to dig up the entire tank field.
14 When I questioned the Division of Air
15 Quality about this, they replied that CARB
16 could only guarantee a 98 percent
17 efficiency with all of the components
18 installed. But their system is designed
19 for pressurized tanks with Stage II.
20 That's California. This does not correlate
21 to tanks without Stage II in Delaware.

22 I asked DNREC for a breakdown
23 of how many VOCs will be reduced for each
24 individual EVR component. They said that



1 they do not know. Why are tanks being
2 required to dig up their entire tank
3 field -- tank owners -- to replace spill
4 buckets with EVR spill buckets when DNREC
5 does not even know if an EVR spill bucket
6 will reduce VOCs in a tank working under
7 negative pressure.

8 I guess I can't go -- I can
9 just submit these.

10 THE HEARING OFFICER: You can
11 definitely submit the paper copy of the
12 comments.

13 MR. WORTH: The EPA stopped
14 looking at California 15 years ago. Why is
15 Delaware still looking to implement
16 requirements that just do not correlate to
17 a non-Stage II environment? I hope DNREC
18 will at least consider a path forward that
19 will not bankrupt tank owners and will
20 present a more sensible option.

21 Do you want a copy?

22 THE HEARING OFFICER: Yes. Do
23 you need that copy?

24 MR. WORTH: No.



1 THE HEARING OFFICER: I can
2 mark this copy into the record.

3 Please allow the record to
4 reflect the document given by Josh Worth as
5 Worth Exhibit 1.

6 MR. WORTH: That was only a
7 portion of it.

8 THE HEARING OFFICER: You may
9 send additional comments if you'd like to.
10 It's not necessary to submit these same
11 comments via email, but if you have
12 anything additional, you can surely send
13 those electronically.

14 Next we have Mark Baker.

15 MR. BAKER: So this process
16 started rough back in April, but I'd like
17 to thank Frank and Jim for working with the
18 committee. They addressed a lot of our
19 concerns.

20 I do want to say that I don't
21 agree with the premise for some of the
22 regulations and I anticipate future
23 problems. However, I will start by saying
24 I do support the adoption of the proposed



1 regulation at this time. We must speed up
2 decommissioning, and the only way to do it
3 under the current regs is extremely cost
4 prohibitive. And the industry is facing
5 other challenges and we need this
6 flexibility.

7 But my concerns about the
8 regulation and the reason I feel it needs
9 to be looked at again moving forward and I
10 think very soon, I echo Josh's comments
11 what he says about the complete EVR
12 systems. Our data from Delaware with a
13 continuous pressure monitoring system shows
14 that tanks are almost always under a
15 negative pressure. In the state of a leak
16 alarm, one of its systems was still under a
17 negative pressure 87 percent of the time
18 while this triggering leak alarm causing
19 action at the site, contractor involvement,
20 et cetera. This does not correspond with
21 the assumed base-level emissions that are
22 used to justify the need for the EVR system
23 by DNREC.

24 A leak in these systems does



1 not equate to emissions or release. The
2 EVR components would work fine without a
3 complete CARB system, as Josh mentioned.

4 The other thing is CARB orders
5 are constantly changing. VR-102-R is
6 incorporated by reference in a couple
7 places in the regulations. There's another
8 section that references VR-102-S. But CARB
9 is already released. VR-102-T in October.
10 And I brought as an example, here's a new
11 overfill protection valve by Franklin
12 Fueling System approved for OVW. It was
13 only approved under version T of the
14 regulations. So in Delaware this could be
15 the greatest overfill protection device
16 there is, but we can't use it. It's not in
17 the regulations unless you re-open this and
18 go through this process again, public
19 workshops, public hearings, and do this.

20 So I'm extremely disappointed
21 that this attempt by Delaware to marry to
22 California is not needed and it will only
23 cause regulatory-compliance hardships for
24 all parties, the industry and DNREC, moving



1 forward. So I'm extremely disappointed
2 that DNREC did not follow a more
3 straightforward path that would have
4 resulted in no real increase in emissions
5 but would have allowed us to work together
6 better into the future.

7 And real quick, on the
8 continuous pressure monitoring, the CARB
9 orders were all updated in these regs. I
10 don't even know if the CPM system that I
11 have at my site, one of the test systems,
12 is even in compliance with these new
13 regulations. I guess I will have to
14 decipher CARB to figure that out.

15 But I do support the adoption
16 at this time.

17 THE HEARING OFFICER: Thank
18 you, Mr. Baker. Was there anything that
19 you would like entered into the record?

20 MR. BAKER: No. I will submit.

21 THE HEARING OFFICER: Thank
22 you.

23 Lastly we have Ellen Valentino.

24 MS. VALENTINO: Good evening.



1 My name's Ellen Valentino. I'm here today
2 on behalf of Mid-Atlantic Petroleum
3 Distributors. I do have something to
4 submit for the record. And just aside, I
5 do think this is a fair comment. I think
6 when you have three people speaking on a
7 regulation that's going to cost an industry
8 collectively millions and millions of
9 dollars, I think the timer could have been
10 put on pause to have a truly -- come in
11 here and allow people to complete their
12 comments.

13 But moving forward, my comments
14 are as follows: We think that if you move
15 forward with these regulations, that DNREC
16 should immediately reconvene the
17 underground storage tank holders meeting so
18 we can continue discussions on these two
19 very important matters and very expensive
20 matters to the industry. I know Wawa
21 mentioned one. And as an industry we
22 concur that that needs to be reopened and
23 discussed.

24 Secondly, we think that, again,



1 with this regulation and others, that DNREC
2 has a responsibility to have a cost-benefit
3 analysis. It needs to be transparent in
4 that, and it needs to be attached and at
5 least presented to the stakeholders for
6 comment, because that might even be in
7 disagreement. That is not included in this
8 regulation.

9 Over the past several weeks,
10 there continues to be -- and I'm just going
11 to say it -- this issue of not just DNREC
12 but Delaware as a whole, but DNREC and the
13 regulatory burdens on businesses that need
14 to be justified or have a rationale. Have
15 a rationale I think is key. We understand
16 the State has the authority to care for its
17 citizens, care for its environment, and
18 care for the economy of the state. But at
19 the same time, they have a responsibility
20 to be a fair broker to the business
21 community, and we again want that noted,
22 mentioned. We will submit this, and,
23 again, urge re-opening of the stakeholder
24 meeting to talk about what is a very



1 expensive, new requirement in this proposal
2 that needs to be quantified before its
3 implementation date.

4 So thank you very much.

5 THE HEARING OFFICER: Thank
6 you. Please allow the record to reflect
7 the document submitted by Ms. Valentino as
8 Valentino Exhibit No. 1.

9 Is there anyone who has signed
10 in that checked that they would not like to
11 comment who would like to provide a comment
12 now?

13 (No response.)

14 THE HEARING OFFICER: As the
15 Department has met the hearing protocols,
16 and there is no further public comment, the
17 record will remain open through
18 January 23rd, 2020, at which time the
19 record will then close.

20 I would like to thank you for
21 your attendance tonight, and the hearing is
22 now adjourned at 6:32.

23 (Hearing was adjourned at
24 6:32 p.m.)



C E R T I F I C A T E

STATE OF DELAWARE)

)

NEW CASTLE COUNTY)

I, Kimberly A. Hurley,
Registered Merit Reporter and Notary
Public, do hereby certify that the
foregoing record, pages 1 to 30 inclusive,
is a true and accurate transcript of my
stenographic notes taken on Wednesday,
January 8, 2020, in the above-captioned
matter.

IN WITNESS WHEREOF, I have
hereunto set my hand and seal this 14th day
of January, 2020, at Wilmington.



Kimberly A. Hurley, RPR, RMR

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