

**In the Matter Of:**

*Department of Natural Resources & Environmental Control*

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*CRODA INC. FEDERALLY ENFORCEABLE*

*June 29, 2021*

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DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENTAL CONTROL  
OF THE STATE OF DELAWARE

RE: Croda Inc. Federally Enforceable )  
7 DE Admin. Code 1102 Application)  
Docket #2021-P-A-0014 )

. . . . .

Virtual Public Hearing  
Dial-In Number: 1-408-418-9388  
Event Number: 173 792 2610

Tuesday, June 29, 2021  
6:00 p.m.

. . . . .

BEFORE: Lisa Vest, Hearing Officer

FOR THE DIVISION: Joanna French, DNREC

-- Transcript of Proceedings --

WILCOX & FETZER  
Registered Professional Reporters  
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1 MS. VEST: Good evening. The time  
2 is 6:00 p.m. I believe that everybody has  
3 been connected, and we are all here, so  
4 welcome.

5 Thank you for taking the time out  
6 of your busy schedules on this extremely hot  
7 day.

8 The date is Tuesday, June 29, 2021,  
9 and we are here this evening to provide the  
10 virtual platform for the State of Delaware's  
11 Department of Natural Resources and  
12 Environmental Control's virtual public  
13 hearing regarding Croda.

14 They currently have pending before  
15 the Department a federally enforceable Air  
16 Quality 1102 permit application.

17 For those of you that do not  
18 recognize me, my name is Lisa Vest. And  
19 Secretary Garvin has designated me to serve  
20 as the hearing officer for tonight's legal  
21 proceedings.

22 Just a few introductory remarks,  
23 and then we will turn it over to the  
24 Department for the beginning of the

1 presentation portion of tonight's matter.

2 Changes were made to DNREC's public  
3 hearing protocols back in 2020, originally  
4 necessitated by Delaware's ongoing State of  
5 Emergency, due, of course, to the COVID-19  
6 pandemic.

7 First and foremost, this hearing is  
8 being conducted virtually. No one is  
9 gathered in the same room. Everybody is  
10 participating independently in their own  
11 respective locations.

12 While there are no sign-in sheets  
13 to serve as a way of attendance at tonight's  
14 hearing, the system, WebEx, does generate a  
15 list for these matters, and the Department  
16 will still keep record of those who have  
17 virtually attended tonight. So, again, I do  
18 thank you for taking the time to join us this  
19 evening.

20 At the conclusion of these remarks,  
21 I will turn the hearing over to  
22 representatives for both the Department and  
23 the Applicant, which again in this case is  
24 Croda. Their presentations will be offered

1 for the record being generated in this  
2 matter.

3 As I did mention, there is a court  
4 reporter that is also virtually present. She  
5 will, of course, prepare a verbatim  
6 transcript of the hearing tonight, pursuant  
7 to DNREC's statutory obligations to do so.

8 And, as always, that transcript  
9 will be posted on the Department's hearing  
10 webpage that's dedicated to this matter as  
11 soon as we get it from the court reporting  
12 company.

13 Following the conclusion of both  
14 the Department's presentation and the  
15 Applicant's presentation, we then turn to the  
16 live comment portion of tonight's hearing.

17 We do have a pre-registration  
18 protocol which allows members of the public  
19 to preregister in advance. And then we have  
20 a little bit of time to make sure that, you  
21 know, they can connect and everything is  
22 good.

23 And we do have one gentleman  
24 tonight that will be offering live comment,

1 and that will happen at the conclusion of  
2 both presentations.

3 As is the case with all DNREC  
4 public hearings, the Department wishes to  
5 ensure that everyone is offered the ability  
6 to have comment included into the hearing  
7 record that gets generated in these matters.

8 Therefore, the record will not be  
9 closing at the conclusion of tonight's  
10 proceedings. Rather, it will remain open to  
11 receive comment through July 14th. Members  
12 of the public may feel free to offer comment  
13 after hearing the presentations tonight, if  
14 they wish to do so.

15 For those of you that are attending  
16 this meeting, I would encourage you to check  
17 out DNREC's webpage for public hearings  
18 that's found under the Administrative Law  
19 Section.

20 All presentations, along with the  
21 exhibits that you will see being entered into  
22 the record tonight, and any other  
23 documentation and comments that may come in  
24 between now and the time that the record

1 closes on July 14th, everything will be  
2 posted as it gets received, and the public  
3 may gain a wealth of information by reviewing  
4 all of that documentation.

5 Of course, all mechanisms  
6 previously available by which to offer  
7 comment remain in effect: Electronic link,  
8 e-mail, and, of course, United States Postal  
9 Service.

10 And, also, the following protocols  
11 do remain in place, as they are for all  
12 public hearings:

13 Number one: All comment received  
14 must be limited solely to the subject matter  
15 of tonight's hearing. All such comments  
16 pertinent to the subject matter will be  
17 incorporated into the record being generated  
18 in this matter.

19 Number two: In order to ensure  
20 that everyone who wishes to offer comment for  
21 the Secretary's consideration is  
22 accommodated, the record will remain open  
23 following tonight through July 14th, 2021.

24 Number three: There is only one



1 authentic record of this formal proceeding  
2 tonight, and it is the official court  
3 reporter's verbatim transcript, which again  
4 will be posted on the hearing webpage as soon  
5 as it is received.

6 Number four: The statutory purpose  
7 of tonight's hearing is, of course, to help  
8 build the record with regard to this pending  
9 permitting matter and the Department's  
10 actions regarding that.

11 A record consisting of the  
12 transcript of the hearing tonight, all  
13 written comments that are received, all  
14 exhibits, and eventually my Hearing Officer's  
15 Report, will all be reviewed by Secretary  
16 Garvin.

17 The Secretary is the one who will  
18 ultimately issue an order following his  
19 review process, and that order will contain  
20 his decisions on this matter and his  
21 reasoning therefor.

22 Lastly, it's important to note that  
23 no decisions have already been made by the  
24 Department, nor will any decisions be made

1           tonight with regard to this pending action.

2                       Again, the public comment period  
3 will remain open through July 14th, 2021 so  
4 that everyone has ample opportunity to submit  
5 written comment for the Secretary's  
6 consideration, should they wish to do so.

7                       Comment may be submitted through a  
8 comment form link on the hearing page, via  
9 e-mail to DNRECHearingComments@delaware.gov,  
10 or, of course, via the United States Postal  
11 Service at the physical address indicated on  
12 the hearing page and/or the public notices  
13 that have all been previously issued in this  
14 matter.

15                      It should be noted that written  
16 comment to DNREC may not be submitted via any  
17 social media platforms such as Twitter,  
18 Facebook, YouTube, or standard text  
19 messaging.

20                      Lastly, please remember that all  
21 comment, whether it's received through the  
22 United States Postal Service physically or  
23 through any of the electronic mechanisms that  
24 I have just mentioned now, they all bear the

1 same weight, and they will all be considered  
2 equally by the Secretary prior to his making  
3 a final decision, provided that they are  
4 received before July 14, 2021.

5 Once again, the ultimate decision  
6 regarding this matter is made by DNREC's  
7 Secretary Garvin. This formal hearing acts  
8 as a mechanism to enable the Department to  
9 thoroughly vet this proposed permitting  
10 action to the public and to let the public  
11 know the various ways by which comment may be  
12 submitted for the Secretary's consideration.

13 That being said, I am now going to  
14 turn the floor, as it were, over to Joanna  
15 French. She has a brief presentation on  
16 behalf of the Department. And Joanna, you  
17 may proceed when ready.

18 MS. FRENCH: Thank you. My name is  
19 Joanna French, and I am the acting program  
20 administrator for the Engineering and  
21 Compliance Branch in the Division of Air  
22 Quality.

23 Thank you for joining us today for  
24 the public hearing on the air permit

1 application for Croda. The application was  
2 required to be submitted by the settlement  
3 agreement dated February 26, 2021 to update  
4 the emission units related to the ethylene  
5 oxide production facility.

6 I will briefly go through the  
7 application timeline. The original  
8 application was received on January 4, 2021.  
9 Following a review of the application by the  
10 Division, a revised cover letter was  
11 submitted on April 16, 2021.

12 We placed a legal notice in the  
13 Delaware State News and the News Journal,  
14 as well as online on our DNREC Internet site  
15 on May 30, 2021. And tonight, June 29th, is  
16 our public hearing.

17 We will be accepting verbal  
18 comments from those who have preregistered.  
19 Additionally, written comments may be  
20 submitted on this application, the draft  
21 permit, as well as the technical memorandum  
22 through July 14, 2021.

23 Croda will provide specific  
24 information on the application in their

1 presentation. But I wanted to give just a  
2 brief summary of the application.

3 The application addresses three  
4 items.

5 The first item is a request to  
6 re-route emissions from the Drying Column  
7 Hotwell to the control device, which is the  
8 Ethanol Dehydration Furnace. This change  
9 will eliminate direct emissions from the  
10 Hotwell.

11 The second item will require a  
12 higher control of efficiency from the vent  
13 scrubber. The control requirement will be  
14 changed from 95 percent to 99 percent. And  
15 in addition to this change, operating  
16 parameters for the operation of the scrubber  
17 will be added to the permit as determined by  
18 stack testing that was performed on that  
19 unit.

20 And the last item, item number  
21 three, will address permitted emissions from  
22 the ethanol dehydration furnace. This change  
23 will revise emissions of carbon monoxide,  
24 nitrogen oxides, sulfur dioxide, volatile

1 organic compounds, and particulate matter.

2 The current permit did not include the  
3 maximum emissions from this process, and this  
4 error will be corrected for this permit.

5 I will give you a little bit of  
6 background on Croda. The facility is  
7 considered a Major Source and is subject to  
8 our Title V Operating Permit Program.

9 Croda emits greater than the EPA  
10 Major Source Threshold for nitrogen oxides.  
11 The facility is a Synthetic Minor Source for  
12 both volatile organic compounds and hazardous  
13 air pollutants.

14 This means that the facility has  
15 taken federally enforceable operational  
16 limitations in their permit to keep emissions  
17 below these Major Source Thresholds.

18 This is just a table of the EPA  
19 Major Source Thresholds. EPA is the one who  
20 sets the emission limits for the Major Source  
21 Thresholds.

22 Croda is located in New Castle  
23 County and is a major source of nitrogen  
24 oxides, since emissions may exceed 25 tons

1 per year.

2 As I mentioned, Croda has taken  
3 permit limits to restrict emissions of  
4 volatile organic compounds and hazardous air  
5 pollutants below 25 tons per year.

6 Additionally, emissions of a single  
7 hazardous air pollutant may not exceed ten  
8 tons per year.

9 So what does that mean for our  
10 permitting process? Major Sources are  
11 required to have a Title V Operating Permit.  
12 This permit is enforceable by both the State  
13 of Delaware as well as the Environmental  
14 Protection Agency.

15 The legal notice for this type of  
16 permit is 30 days rather than the 15 day for  
17 a state enforceable permit.

18 Additionally, the Region 3 EPA  
19 office has a 45-day review period to look at  
20 both the draft permit and the technical  
21 memorandum which explains the basis behind  
22 the permit.

23 In addition, effective states,  
24 which are states within 50 miles of the

1 source, are also provided notice of our  
2 intent to issue a permit to the facility.

3 In this case we notified Maryland,  
4 Pennsylvania, and New Jersey of notice to  
5 issue this draft permit.

6 So I wanted to go through our  
7 permitting process so you know exactly what  
8 we do when we look at a permit application.

9 Once we receive the application,  
10 the first thing that happens is our  
11 administrative staff reviews the application  
12 to make sure that it's administratively  
13 complete, which means that all the parts are  
14 there, all the boxes are checked.

15 The application is then sent to an  
16 assigned engineer. He reviews the  
17 application to make sure that the application  
18 is technically complete, that we have all the  
19 information we need to make a determination  
20 for the permit.

21 The engineer will check to see  
22 where the facility is located. If the  
23 facility is located within the Coastal Zone,  
24 we will work with the Division of Climate and



1 Energy to determine if a Coastal Zone permit  
2 is required.

3 Croda is located within the Coastal  
4 Zone. Coastal Zone approval was provided  
5 with initial application for the ethylene  
6 oxide plant.

7 The higher emission limits that are  
8 being requested for the Ethanol Dehydration  
9 Furnace were actually included in the  
10 application and permit for the Coastal Zone  
11 application.

12 The engineer will also verify the  
13 zoning of the property to make sure that the  
14 proposed equipment will be placed on the  
15 site.

16 Next, the engineer will review the  
17 technical information and verify that the  
18 emission calculations on the application are  
19 correct.

20 The engineer will also use a  
21 computer model to determine pollutant  
22 concentrations outside of the facility's  
23 property lines to verify that these emissions  
24 will not be detrimental to public health and

1 the environment.

2 The engineer will review the  
3 application and determine which State and  
4 Federal requirements are applicable to the  
5 project. They will draft a technical  
6 memorandum.

7 And this technical memorandum will  
8 discuss all applicable Federal and State  
9 regulations, as well as associated  
10 requirements.

11 This document includes all the  
12 reasoning behind the draft permit, including  
13 emission and operational limits, testing,  
14 monitoring, recordkeeping, and reporting.

15 Based on the technical memorandum,  
16 the engineer will draft the permit.

17 The draft permit and the technical  
18 memorandum are reviewed internally by the  
19 engineer program manager and the program  
20 administrator.

21 Once approved internally, the draft  
22 permit will be public noticed, submitted to  
23 the EPA Region 3 Office for review, and  
24 notifications will be sent to surrounding

1 states.

2 The application draft permit and  
3 technical memorandum were advertised in this  
4 case with a scheduled public hearing. So  
5 tonight we will be accepting verbal comments  
6 from those who have registered or  
7 preregistered.

8 And, additionally, we will accept  
9 written comments on the submitted  
10 application, the draft permits, and the  
11 technical memorandum through July 14, 2021.

12 After the close of the public  
13 hearing, the Division of Air Quality,  
14 as well as the applicant, Croda, will respond  
15 to all of the comments received.

16 The Division of Air Quality will  
17 draft a technical response memorandum  
18 including all responses to the contents, and  
19 we will submit this memorandum to the hearing  
20 officer so that she can review and make a  
21 recommendation to the Secretary of the  
22 Department.

23 Okay. And with that, that is the  
24 end of my presentation. I would like to read

1 our exhibits into the record.

2 MS. VEST: Okay.

3 MS. FRENCH: Okay. The first  
4 Exhibit Number 1 is the permit modification  
5 application.

6 Exhibit Number 2 is the revised  
7 permit modification application cover letter.

8 Exhibit Number 3 is the legal  
9 notice for the Delaware State News.

10 Exhibit Number 4 is the legal  
11 notice for the News Journal.

12 Exhibit Number 5 is our technical  
13 memorandum.

14 Exhibit Number 6 is our  
15 draft/proposed construction permit.

16 Exhibit Number 7 is the State  
17 Public Meeting Calendar notice.

18 Exhibit Number 9 is the DNREC  
19 public hearing webpage.

20 And finally, our last exhibit,  
21 Exhibit Number 10, is this hearing, public  
22 hearing presentation that I am giving now.

23 MS. VEST: Okay. Just some basic  
24 keeping for the record, for the benefit of

1 the record: Are the Exhibits 1 through 11,  
2 as shown on the screen right now, the same  
3 documents that have been posted on the  
4 hearing webpage dedicated to this matter?

5 MS. FRENCH: Yes, they are.

6 MS. VEST: And have they been  
7 changed or altered in any way?

8 MS. FRENCH: No, they have not.

9 MS. VEST: Okay. Excellent. Let  
10 the record reflect that DNREC proposed  
11 Exhibits 1 through 11, as identified by  
12 Ms. French now and as posted on the hearing  
13 webpage, are hereby formally entered into the  
14 hearing record.

15 Does the Department have anything  
16 that they wish to add additionally other than  
17 what you have just said at this time?

18 MS. FRENCH: No, we do not.

19 MS. VEST: Okay. Very good. And  
20 thank you Joanna, for that.

21 Going on right now to the  
22 Applicant's portion of tonight's proceeding,  
23 I believe that Mr. Barnett is representing  
24 Croda, and he has a brief presentation that

1 he would like to provide to the attendees  
2 here, as well.

3 So we will take down that screen  
4 and get Croda's up. And Mr. Barnett, you may  
5 proceed when ready.

6 MR. BARNETT: All right. Thank  
7 you, Lisa. Can you hear me okay?

8 MS. VEST: I can hear you fine.

9 MR. BARNETT: Again, my name is  
10 Chris Barnett. I'm the site director of the  
11 Croda Atlas Point facility.

12 Before I get started on our  
13 permitting information about the permitting  
14 request, I wanted to mention today that we  
15 did have a drill at the site.

16 So if you were living within  
17 hearing distance of our site alarm, you may  
18 have heard it at an unusual time today.  
19 Normally, it goes off at lunchtime, 12  
20 exactly every day as a test. Today it went  
21 off at 11.

22 Hopefully, our message got out to  
23 the community. We did have some signs and  
24 other notifications we did, and we had a

1 successful test.

2 Again, it was just a drill of our  
3 site population. It was not an alarm that we  
4 would normally hear, again, at the site. It  
5 normally happens at noon. Today it happened  
6 at 11 and then again at 12, so hopefully  
7 everyone was pre-informed and did not worry.

8 So getting started with the permit  
9 discussion, I have essentially four main  
10 topics. These will match with what Joanna  
11 talked about earlier, and some of this will  
12 sound a little redundant, so I apologize.

13 We will talk about the vent  
14 scrubber, the tank we call a Hotwell, our  
15 furnace permit limits for the emissions that  
16 will be directed from the Hotwell to this new  
17 furnace, and, lastly, a steam boiler and some  
18 changes we are making there around NOx.

19 Next slide, please: So the  
20 scrubber that we are talking about, we call  
21 it Scrubber T-330. This scrubber removes  
22 ethylene oxide from off-gases from the EO  
23 storage tanks that we have at the ethylene  
24 oxide production plant.

1                   The emissions from this scrubber  
2                   go, currently go to the atmosphere. This  
3                   scrubber will control emissions to greater  
4                   than 99 percent.

5                   However, we want to take these  
6                   emissions and reroute them so that they go  
7                   back into the process to be recaptured.

8                   So this would essentially take the  
9                   piping that goes to the atmosphere. It  
10                  returns it back to the process where we can  
11                  capture the ethylene oxide in the process,  
12                  itself.

13                  It's a change that should reduce  
14                  emissions, again, from the scrubber.

15                  Next slide, please: The Hotwell is  
16                  just essentially a tank. It's designated as  
17                  F-610 here at our site. It's a tank where we  
18                  collect steam and streams of hot water.

19                  And it's used to collect these from  
20                  an area where we have a glycol by-product  
21                  that's made in the plant. These gases,  
22                  again, are currently vented to the  
23                  atmosphere.

24                  And you should note that this



1 Hotwell has not been operated since last  
2 September. We shut down this area of the  
3 plant when we had done some stack testing and  
4 found that the Hotwell was not working as we  
5 thought it was from its design.

6 We are going to reroute these vent  
7 streams from the atmosphere to go to our  
8 Ethanol Dehydration Furnace instead. This  
9 furnace will burn these emissions and  
10 essentially convert any volatile organic  
11 compounds into carbon monoxide and water.

12 Next slide, please: This Ethanol  
13 Dehydration Furnace is designated as B-1210  
14 at our site. The Hotwell, again, will be  
15 connected to the furnace, but it won't have a  
16 significant impact on the emissions profile  
17 from the furnace, because the Hotwell  
18 emissions are very, very small. But the  
19 furnace will treat this small amount of  
20 emissions and, again, make it into, you know,  
21 carbon monoxide and water.

22 After we make this change, we will  
23 be required to do a stack test of this unit  
24 in the future.

1           The permit updates that Joanna had  
2 talked about, again, are going to correct  
3 some emission limits that were approved back  
4 when we originally did our Coastal Zone  
5 permitting, the emission limits we changed in  
6 the Title V permit.

7           Again, these were discussed as part  
8 of the Coastal Zone permitting actions that  
9 were made before.

10           So it's just, again, a correction  
11 of some numbers that were translated  
12 mistakenly.

13           The one thing we are agreeing to as  
14 part of this process, we recognize that this  
15 does increase some NOx emissions from our  
16 furnace, so we will be reducing NOx emissions  
17 in other parts of our facility by a ratio of  
18 1.3 to 1. And I will talk about that a  
19 little bit in this last slide.

20           We are going to do that -- you can  
21 go ahead, Joanna. Thank you. Yes. The last  
22 slide I have here, I'm going to talk a little  
23 bit about the boilers that we use at the  
24 site. We use boilers at the site to make

1 steam, and the steam is used to heat things  
2 around our facility, from our process to our  
3 buildings.

4 The one boiler we have, we call  
5 boiler three, is a vintage technology from  
6 1947. It's been upgraded over the years, but  
7 it's never been completely replaced with much  
8 newer technology.

9 We will be replacing that boiler.  
10 It's not currently in operation. And we are  
11 going to replace it with a new technology  
12 boiler that has significantly lower NOx  
13 emissions. It has much more effective burner  
14 technology and other things that will make it  
15 a lot better at NOx emissions.

16 So we will use this to essentially  
17 offset, more than offset the increase in NOx  
18 emissions from our dehydration furnace.

19 And this is something that we are  
20 currently working on this project right now,  
21 and it will have to go through the permitting  
22 process.

23 So that's all the information I  
24 have about the permitting changes. So I will

1 hand it back to you, Lisa.

2 MS. VEST: Okay. Thank you very  
3 much, Mr. Barnett. And, again, a little  
4 housekeeping regarding your presentation.

5 Croda has provided an electronic  
6 copy of that Power Point presentation, and I  
7 have gone ahead and entered that into the  
8 record, as well, for anyone that's attending  
9 virtually this evening.

10 You can, again, visit the DNREC  
11 hearing webpage, and you will see that under  
12 Applicant's Exhibit Number 1. And, again,  
13 thank you Mr. Barnett for that information.

14 At this point we would be going to  
15 those that have offered to speak and  
16 preregistered. We had one gentleman, Martin  
17 Willis, has preregistered to speak, but I'm  
18 not sure if he is actually attending tonight.  
19 Megan, do you see him in the list yet?

20 MS. SWEENEY: This is Megan. No, I  
21 do not see him in the list.

22 MS. VEST: Okay. Well, we will  
23 give -- I will say some final remarks here.  
24 We will give him a couple more minutes.

1                   Who knows with this heat, anything  
2                   could have happened. I hope he is okay. But  
3                   he did register to speak. I'm sure that if,  
4                   for whatever reason, he did not make it  
5                   tonight, I'm sure that he will be able to  
6                   submit them over the next 15 days for  
7                   inclusion into the record.

8                   So, with that being said, I want to  
9                   thank both the Department and the Applicant  
10                  for offering their presentations for those in  
11                  attendance tonight.

12                  Again, comments can be received  
13                  anytime between now and through July 14,  
14                  2021, whether they come physically through  
15                  the United States Postal Service or any kind  
16                  of other physical correspondence, Fed-Ex,  
17                  whatnot, they can get mailed to the address  
18                  that you see on the screen, they can also be  
19                  submitted electronically through the comment  
20                  link that you will find on the DNREC hearing  
21                  webpage.

22                  It doesn't matter how we get them,  
23                  as long as they are received by the  
24                  Department on or before July 14, 2021, they

1 all bear the same weight. It doesn't matter  
2 whether they are spoken verbally tonight or  
3 whether they are received prehearing, during  
4 hearing, or post-hearing.

5 As long as the record is open to  
6 receive them, and they are related to the  
7 specific subject matter of this particular  
8 permitting action, they will be incorporated  
9 into the record, and the Secretary will  
10 review them all prior to his making a  
11 decision.

12 One last time, Megan, do you see  
13 Mr. Willis?

14 MS. SWEENEY: No, do I not see him.

15 MS. VEST: Okay. Well, Mr. Willis,  
16 I hope everything is okay. We tried to give  
17 you the opportunity. So, by all means, if  
18 you are listening to this on your way or  
19 something, I'm sorry you couldn't make it.  
20 Please feel free to submit your comments over  
21 the next 15 days, like I said.

22 I want to thank everybody for  
23 attending tonight. This meeting is hereby  
24 adjourned. (6:24 p.m.)

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CERTIFICATE

I, Lorena J. Hartnett, a Notary Public and Registered Professional Reporter, do hereby certify that the foregoing is an accurate and complete transcription of the proceeding held at the time and place stated herein, and that the said proceeding was recorded by me and then reduced to typewriting under my direction, and constitutes a true record of the testimony given by said witnesses.

I further certify that I am not a relative, employee, or attorney of any of the parties or a relative or employee of either counsel, and that I am in no way interested directly or indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office on this 30th day of June 2021.



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Lorena J. Hartnett  
Registered Professional Reporter

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