

**In the Matter Of:**

*Department of Natural Resources & Environmental Control*

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*TITLE V STATE OPERATING PERMIT PROGRAM*

*October 27, 2021*

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

RE: Proposed Amendments to  
7 DE Admin. Code 1130  
"Title V State Operating Permit Program"

.. . . .

Virtual Public Hearing (1 of 3)  
Dial-In Number: 1-408-418-9388  
Event Number: 179 845 2350

Wednesday, October 27, 2021  
6:00 p.m.

.. . . .

BEFORE: Lisa Vest, Hearing Officer

FOR THE DIVISION: Taylor Englert, DNREC

-- Transcript of Proceedings --

WILCOX & FETZER  
Registered Professional Reporters  
1330 King Street - Wilmington, Delaware 19801

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1 MS. VEST: Good evening. I want to  
2 thank everybody for attending tonight. I  
3 believe that all of us are just about all  
4 connected.

5 Welcome. I am thankful that  
6 everybody is all here. We are getting ready  
7 to proceed tonight. The date is October 27,  
8 2021, and we are here this evening to provide  
9 the virtual platform for DNREC to conduct its  
10 public hearing on several proposed air  
11 quality amendments.

12 For those of you that may not know  
13 me or have seen me before, my name is Lisa  
14 Vest, and DNREC Secretary Garvin has  
15 designated me to serve as the hearing officer  
16 for tonight's proceedings.

17 To set the stage for tonight's  
18 hearing, specifically with regard to our  
19 hearing protocols, this hearing is being  
20 conducted virtually. No staff is gathered  
21 together in the same room. Everyone is  
22 participating independently at their own  
23 respective locations.

24 While there are no sign-in sheets

1 that we are passing out, so to speak, to  
2 document physical attendance tonight, the  
3 WebEx platform does provide an attendance  
4 list. It gets generated automatically.

5 So for those of you that are in  
6 attendance, we are keeping record of that.  
7 It will become part of our files in this  
8 matter. The Department still has a  
9 verifiable record of those who have joined us  
10 tonight. And, again, I thank everyone for  
11 their interest in doing so.

12 At the conclusion of these  
13 introductory remarks, I will be turning the  
14 hearing over to Department staff. They have  
15 a brief presentation regarding each of  
16 DNREC's proposed regulatory amendments. We  
17 do this for the benefit of the hearing record  
18 that gets generated tonight.

19 There is still a court reporter  
20 present. They will prepare a verbatim  
21 transcript of the hearing tonight, pursuant  
22 for DNREC statutory requirements to do so.  
23 And, as always, that transcript will be  
24 posted on the hearing webpage dedicated to

1 this matter as soon as it is received.

2 We have a little bit of a unique  
3 situation tonight. There are three separate  
4 sets of regulations that the Department is  
5 going to be talking about and offering a  
6 presentation on.

7 Because each one is separate and an  
8 individual regulation, for efficiency we are  
9 doing them all on the same night, but they  
10 are all going to have separate hearing  
11 records.

12 So what we are going to do is we are  
13 going to take the first one, which is 7  
14 Delaware Admin Code 1130, Title V, State  
15 Operating Permit Program. The Department  
16 will give its presentation, and then at the  
17 conclusion of that presentation, I will ask  
18 if there is anyone that has preregistered,  
19 which is our protocol, that wishes to offer  
20 comment for the record.

21 We do have one person that  
22 preregistered. So at the conclusion of the  
23 first presentation, I will ask that person if  
24 they are still presently attending and if

1 they wish to offer comment. If so, we will  
2 allow that person to comment specifically on  
3 Regulation 1130.

4 And then we will close that record.  
5 And then we will start back up with the next  
6 one, which I believe is 7 Delaware Code 1102  
7 regarding Permits, and we will do the same  
8 thing. There will be a presentation, and  
9 then we will see if that person wishes to  
10 comment on that particular reg amendment. We  
11 will close that record.

12 And then we will do the third one,  
13 which is 1103, which is Ambient Air Quality  
14 Standards.

15 So it's a little bit different than  
16 what we normally do. It's kind of like three  
17 hearings rolled into one. But we have to do  
18 it in certain instances like this, because we  
19 do need to maintain separate records for each  
20 proposed promulgation.

21 So, again, at the conclusion of  
22 each one, the floor will be open for the  
23 member of the public that has preregistered  
24 to offer comment.

1           As is the case with all DNREC  
2 public hearings, the Department wishes to  
3 ensure that everyone is enabled to offer  
4 comments for inclusion into the record and  
5 for the Secretary's consideration.

6           Therefore, we are not going to  
7 close the record tonight at the conclusion of  
8 these proceedings. Rather, the record will  
9 remain open through November 11, 2021 so that  
10 the public has the opportunity to offer  
11 comment in writing for the Secretary's  
12 consideration, should they wish to do so.

13           I would encourage everyone  
14 attending this proceeding tonight to visit  
15 DNREC's public hearing webpage under our  
16 Administrative Law Section. The website has  
17 much more details concerning this pending  
18 regulatory action. You will also be able to  
19 click and download, if you wish, all of the  
20 exhibits that the Department has up there  
21 that are being proposed. The Department's  
22 presentation, along with the exhibits for  
23 each set of regs, and all other documentation  
24 related to this matter is all posted up



1 there. And it can give you an incredibly  
2 vast amount of information with regard to  
3 each of these regulatory proceedings.

4 Of course, all mechanisms  
5 previously available by which to offer  
6 comment remain in effect. There is an  
7 electronic link. There is e-mail. And, of  
8 course, the United States Postal Service.

9 Additionally, please note that the  
10 following protocols do remain in place for  
11 all DNREC public hearings.

12 Number 1: All comment received  
13 must be limited solely to the subject matter  
14 of tonight's hearing. All comments germane  
15 to the subject matter of this hearing, which,  
16 again, this first one will deal with  
17 Regulatory Matter 1130 regarding Title V,  
18 State Operating Permitting Program, all  
19 comments germane to that subject matter will  
20 be incorporated into the hearing record being  
21 generated.

22 Number 2: As previously noted, in  
23 order to ensure that everyone who wishes to  
24 offer comment for the Secretary's

1 consideration is accommodated, the record  
2 will remain open through November 11, 2021.

3 Number 3: There is only one  
4 authentic record of this formal proceeding  
5 tonight, and it is the official court  
6 reporter's verbatim transcript, which again  
7 will be posted on the hearing page once it  
8 has been received.

9 Number 4: The statutory purpose of  
10 tonight's hearing is to build the record with  
11 regard to the Department's proposed  
12 regulatory actions. The record, consisting  
13 of the transcript of tonight's hearing, all  
14 written comments, all exhibits, and  
15 eventually the Hearing Officer's Report, will  
16 be gathered and reviewed by Secretary Garvin.

17 The Secretary will ultimately issue  
18 an order following that review process. That  
19 order will contain his decision on the matter  
20 and his reasoning therefor.

21 Number 5: It's very important to  
22 note that no decision has already been made  
23 by the Department, nor will any decision be  
24 made tonight with regard to these proposed

1 regulatory actions.

2 Again, we are keeping the record  
3 open through November 11th so that everyone  
4 has ample opportunity to offer written  
5 comment for the Secretary's consideration,  
6 should they wish to do so.

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

15 Please note that written comments  
16 to DNREC may not be submitted via social  
17 media platforms such as Twitter, Facebook,  
18 YouTube, or text messaging.

19 Lastly, please note that whether  
20 comments are received prior to the hearing  
21 tonight, in realtime at the hearing tonight,  
22 or if they are received between now and when  
23 the record closes for comment on November 11,  
24 2021, and regardless of whether they came in

1 electronically or whether they came in  
2 through the United States Postal Service, all  
3 comments bear equal weight, all will be  
4 incorporated into the specific hearing record  
5 on which they are being received for --  
6 again, there is three of them tonight, 1102,  
7 1103, and 1130 -- and all are considered  
8 equally by the Secretary prior to making his  
9 decision in this matter.

10           Again, the ultimate decision  
11 regarding this promulgation is made by  
12 Secretary Garvin. This formal hearing  
13 tonight acts as a mechanism to enable the  
14 Department to thoroughly vet this proposed  
15 action to the public and to make sure the  
16 public is aware of all of the various ways  
17 that comment can be received and submitted  
18 for the Secretary's consideration.

19           That being said, I am going to turn  
20 the matter over to Taylor. She is speaking  
21 on behalf of the Division of Air Quality for  
22 the Department. And, Taylor, you may start  
23 when ready.

24           MS. ENGLERT: Thank you. Good

1 evening. My name is Taylor Englert, and I am  
2 an engineer with the Airshed Planning and  
3 Inventory Program for the Division of Air  
4 Quality in the Delaware Department of Natural  
5 Resources and Environmental Control.

6 The purpose of this hearing is to  
7 receive public comments on the proposed  
8 updates to Title 7 of the Delaware  
9 Administrative Code, Regulation 1130, "Title  
10 V State Operating Permit Program."

11 Title V of the Clean Air Act  
12 requires the Environmental Protection Agency  
13 to implement air quality operating permits  
14 called Title V permits. Title V permits  
15 apply to sources whose emissions meet or  
16 exceed Major Source Levels.

17 These sources are typically large  
18 stationary sources like power plants,  
19 refineries, or manufacturing plants.

20 Title 7 of the Delaware  
21 Administrative Code, Regulation 1130, was  
22 adopted to implement the federal requirements  
23 for Title V permits in Delaware and establish  
24 the permitting procedures and requirements

1 for these sources.

2 The objective of the proposed  
3 amendments to Regulation 1130 is to update  
4 the affirmative defense requirements, the  
5 list of greenhouse gases and their global  
6 warming potential values, and public notice  
7 publication requirements for Title V permits.

8 Each amendment proposed is to  
9 maintain consistency with the Environmental  
10 Protection Agency's current federal  
11 regulations.

12 The affirmative defense requirement  
13 updates were precipitated by the  
14 Environmental Protection Agency's final rule,  
15 published on July 21, 1992 in Volume 57 of  
16 the Federal Register, beginning on Page  
17 32,250. The rule is codified in Title 40 of  
18 the Code of Federal Regulations, Section  
19 70.6(g).

20 Amendments to Greenhouse Gas  
21 compounds and greenhouse warming potentials  
22 follow the Environmental Protection Agency's  
23 updates to Title 40 of the Code of Federal  
24 Regulations Section 98, Table A-1. The final

1 rules that precipitated these amendments were  
2 published on November 29, 2013 in Volume 78  
3 of the Federal Register, beginning on Page  
4 71,903 and on December 11, 2014 in Volume 79  
5 of the Federal Register beginning on Page  
6 73,749.

7 Similarly, updates to public notice  
8 publication requirements for Title V permits  
9 were the result of the Environmental  
10 Protection Agency's final rule published on  
11 October 18, 2016 in Volume 81 of the Federal  
12 Register beginning on Page 71,613. These  
13 changes were codified in Title 40 of the Code  
14 of Federal Regulations, Section 70.7.

15 The first proposed amendment to  
16 this regulation is related to affirmative  
17 defense requirements. Title V permits  
18 require facilities to have specific emission  
19 monitoring and reporting requirements to  
20 demonstrate compliance, that their emissions  
21 are below the allowable limits.

22 Understanding that deviations in  
23 operation are possible from failure in  
24 emission control equipment, the Environmental

1 Protection Agency included a provision in  
2 their July 21, 1992 final rule to allow for  
3 some operational flexibility.

4 The final rule provides an  
5 affirmative defense in the case where permit  
6 limits have been exceeded due to an  
7 emergency.

8 An "emergency" is defined in the  
9 rule as a reasonably unforeseeable event  
10 beyond the control of the source that  
11 requires immediate corrective action to  
12 restore normal operation and that is not due  
13 to certain factors specified in the rule.

14 The affirmative defense clause for  
15 Title V permits is currently included in  
16 Title 7 of the Delaware Administrative Code,  
17 Regulation 1130, Section 6.0. However, it  
18 includes the affirmative defense case for  
19 "emergencies" and "malfunctions."

20 "Malfunction," as defined in  
21 Regulation 1130, means any sudden and  
22 unavoidable failure of air pollution control  
23 equipment or process equipment or of a  
24 process to operate in a normal or usual



1 manner, and that causes the source to exceed  
2 a technology based emission limitation under  
3 the permit, due to unavoidable increases in  
4 emissions attributable to the malfunction.

5 Since the Environmental Protection  
6 Agency's Title V operating permit regulation  
7 only describes affirmative defense provisions  
8 in the case of an emergency, not  
9 malfunctions, the division has proposed to  
10 remove all references to "malfunction" from  
11 Section 6.0 to maintain consistency with the  
12 current federal requirements for affirmative  
13 defense.

14 For example, in Subsection  
15 6.1.3.3.3.1, the phrase "or malfunction" is  
16 removed, as shown by the strikeout.

17 In addition, in Subsection 6.7.1,  
18 the entire definition of "malfunction" is  
19 removed. And in the Section 6.7 header, the  
20 term "malfunction" is also removed.

21 The second set of the proposed  
22 amendments is to Section 2.0, "Definitions."  
23 The definition of "subject to regulation"  
24 sets the criteria for which air pollutants

1 are required to be permitted through  
2 Delaware's Title V program.

3 Specifically, this definition lists  
4 the criteria for which greenhouse gases shall  
5 be subject to, which is based on the  
6 potential greenhouse gas emissions for a  
7 given source.

8 Potential emissions are calculated  
9 using the global warming potential values for  
10 greenhouse gas pollutants, which are based on  
11 the values used in the Intergovernmental  
12 Panel on Climate Change Report.

13 The Environmental Protection Agency  
14 issued a final rule on November 29, 2013 that  
15 revised the global warming potential values  
16 for 23 of the 32 compounds listed in Table  
17 2-1 of Delaware's regulation.

18 On December 11, 2014, the  
19 Environmental Protection Agency issued a  
20 separate final rule that added 30 new  
21 compounds to the list of greenhouse gas  
22 compounds.

23 The division's proposed amendments  
24 include updating the "subject to regulation"

1 definition in 1130 to reflect the most  
2 current federal descriptions of greenhouse  
3 gases and global warming potential values and  
4 revising the greenhouse gas compounds and  
5 their global warming potentials, located in  
6 Table 2-1 of Delaware's regulation, to be  
7 consistent with the Environmental Protection  
8 Agency's current regulations.

9 The next proposed amendment is to  
10 Section 7.0 of Regulation 1130. "Permit  
11 Issuance, Renewal, Reopening, and Revisions."  
12 Subsection 7.10.2 was adopted to implement  
13 public notification requirements for Title V  
14 operating permits.

15 The regulation requires the  
16 Division of Air Quality to provide for public  
17 participation and comment when reviewing and  
18 issuing permits.

19 There is also a requirement to ties  
20 permit application information in Delaware  
21 newspapers, in accordance with Delaware state  
22 statute Title 7 Chapter 60, Sections 6003 and  
23 6004.

24 Members of the public also have the

1 opportunity to request a hearing for the  
2 permit application, if one has not already  
3 been scheduled.

4 The Division's proposed amendments  
5 update the list of required components for  
6 public notice publications in Subsection  
7 7.10.2 of Regulation 1130, to be consistent  
8 with the Environmental Protection Agency's  
9 2016 rule.

10 Changes to this section are shown  
11 on the slide. Underlines show text that is  
12 being added; the strikeout shows text that is  
13 being deleted. These changes include adding  
14 the name, address, and telephone number of  
15 the DNREC staff from whom interested parties  
16 can contact for additional information.

17 The proposed amendments that have  
18 been mentioned so far were published in the  
19 Delaware Register of Regulations on  
20 October 1, 2021, for public review and  
21 comment.

22 Department staff reviewed the  
23 language published on October 1st and  
24 discovered a few typographical errors

1 presented in the publication. Department  
2 staff is recommending the following  
3 additional amendments to correct these  
4 errors:

5 In the definition of "subject to  
6 regulation," the chemical formulas for carbon  
7 dioxide, carbon dioxide equivalent emissions,  
8 nitrous oxide, methane, and sulfur  
9 hexafluoride are shown in regular text. The  
10 numbers in these formulas should be shown as  
11 subscripts.

12 In the same section, there is an  
13 erroneous bullet before the clause, "when  
14 such stationary source undertakes a physical  
15 change or change in the method of operation  
16 that will result in an emissions increase, a  
17 75,000 tons per year carbon dioxide  
18 equivalent emissions or more." The bullet  
19 should be deleted, as this clause is part of  
20 the sentence above it.

21 Lastly, in Table 2-1, the chemical  
22 formula for Capstone 62-U has a subscript "7"  
23 which should be a subscript "5".

24 These updates made to Section 2.0

1 are non-substantive, as detailed in the  
2 Errata Table, which will be submitted as  
3 Exhibit 12 to the hearing record.

4 Now we would like to enter 13  
5 exhibits, shown on the next two slides, into  
6 the public record to support the proposed  
7 amendments to Title 7 of the Delaware  
8 Administrative Code, Regulation 1130. "Title  
9 V State Operating Permit Program."

10 This completes the Department's  
11 presentation of proposed amendments to  
12 Regulation 1130. Thank you.

13 MS. VEST: Okay. Thank you,  
14 Taylor. Just a little housekeeping for the  
15 benefit of the record.

16 Are the exhibits provided and on  
17 display just now the same as those that are  
18 all posted on the Department's hearing  
19 webpage regarding this hearing?

20 MS. ENGLERT: Yes, they are.

21 MS. VEST: And have they been  
22 changed or altered in any way since their  
23 posting?

24 MS. ENGLERT: No, they have not.

1 MS. VEST: Thank you. Let the  
2 record reflect that Department's proposed  
3 exhibits with regard to the proposed  
4 amendments to 7 Delaware Admin Code 1130 be  
5 hereby incorporated into the hearing record.  
6 And thank you, Taylor, for that presentation.

7 At this point I am going to turn it  
8 over to another staff member, and we are now  
9 going to begin the process of checking to see  
10 if our preregistered commenter is available  
11 for comment.

12 According to our process, members  
13 of the public are allowed to offer comment in  
14 realtime at our hearings, provided that they  
15 have preregistered with the Department to do  
16 so.

17 As of the deadline of 12 noon  
18 today, on the date of the hearing, Emily  
19 Rodden from New Castle Prevention Coalition  
20 had registered.

21 Ms. Rodden, are you there with us?  
22 I believe that we are attempting to locate  
23 you on the attendance list and unmute you.  
24 So if you are there, please say that you are.

1 MS. RODDEN: Can you hear me?

2 MS. VEST: I can hear you.

3 MS. RODDEN: Great.

4 MS. VEST: Can you -- I would just  
5 ask that you speak up a little bit louder,  
6 because, of course, we want to make sure  
7 that your comments are contained in the  
8 transcript.

9 Ms. Rodden, a couple of things  
10 before I turn it over to you. As you know,  
11 you will have three minutes to offer comment.  
12 But we are having three separate records  
13 prepared tonight, one for each set of regs.

14 So when we tried to contact you  
15 today, because we weren't sure whether you  
16 wanted to offer comment on each set of  
17 proposed amendments or whether there was one  
18 set in particular. So do you wish to make  
19 comments to 1130, which was just what the  
20 presentation was?

21 MS. RODDEN: Sure.

22 MS. VEST: Okay. Sorry. I hope  
23 that wasn't too confusing to you, because we  
24 need to have three separate records, so there



1 is going to be three separate transcripts,  
2 one for each set of these regs that the  
3 Department is proposing amendments on; so I  
4 want to make sure that your comments are  
5 associated with the right set of regulations,  
6 if that makes sense.

7 MS. RODDEN: Okay. No, I  
8 understand. Yeah.

9 MS. VEST: Okay.

10 MS. RODDEN: I took a little bit of  
11 notes while you guys were going over what  
12 this regulation change would look like, these  
13 amendments.

14 But I was wondering if the comment  
15 could be more of like a question?

16 MS. VEST: Your comment can  
17 definitely be a question.

18 MS. RODDEN: Okay.

19 MS. VEST: But we don't do back and  
20 forth at the hearing, just so you know. So  
21 that question will be taken into  
22 consideration, and we will make sure that it  
23 is addressed within the record later on. But  
24 yes, you can definitely include questions in

1 your comments.

2 MS. RODDEN: Great.

3 MS. VEST: Okay. Do you have --  
4 are you calling in, or do you have a visual  
5 screen in front of you?

6 MS. RODDEN: I have a screen in  
7 front of me.

8 MS. VEST: Okay. So you should see  
9 that you have a few blue circles right now  
10 that represent a clock, a timer, as you were,  
11 that will count down your three minutes. At  
12 the end of the three minutes, the system will  
13 cut you off.

14 But if, for any reason, you don't  
15 get through it all, by all means, like I  
16 said, the record remains open until  
17 November 11th, so please feel free to also  
18 provide written comments, or if you don't get  
19 done the rest of your comments, or if you get  
20 done and you think of more between now and  
21 November 11th, additional comments, it's  
22 quite okay either way.

23 So the timer will start when you  
24 begin speaking. So have at it.

1 MS. RODDEN: All right. Um, so my  
2 understanding of this first amendment is  
3 there is quite a few sections to it. Um, but  
4 the first thing that I guess I wanted to make  
5 comment on was removing all reference to the  
6 term "malfunction."

7 I guess that's in correspondence to  
8 the EPA's operating permit regulation, so  
9 just changing our language to reflect the  
10 EPA's regulations?

11 But I don't see -- I don't see the  
12 difference, I guess. Like what's the  
13 difference in "emergencies" compared to  
14 "malfunctions"? And if there is a  
15 difference, why, why would we remove it from  
16 the language within the permitting  
17 regulations?

18 So the next thing that I wanted to  
19 comment on was -- right -- so the change to  
20 the language of the requirements for  
21 greenhouse gas compounds and global warming  
22 potential values, I think this is a great  
23 idea.

24 I think that companies and

1 industries should have to tell people what,  
2 like how much they are going to emit into the  
3 environment and the surrounding areas.

4 But I guess the thing that I wanted  
5 to point out was just making sure that that  
6 information is easily accessible to like a  
7 normal person, I guess, like making sure that  
8 it's not highly scientific language that  
9 would be inaccessible for like just a regular  
10 person.

11 And then, yeah, I think those were  
12 all the comments that I wanted to make.

13 MS. VEST: Okay. All right. Well,  
14 thank you for those comments. They will be  
15 incorporated into the record.

16 Just a little technical thing here:  
17 We seem to be having trouble with the timer,  
18 but I am keeping track of it. I have one  
19 here at my desk. So I apologize for that  
20 somewhat of a glitch.

21 But if you wish to offer comment  
22 again at the conclusion of the next  
23 proceeding, I will pause and double check and  
24 make sure that you can do that.

1                   So thank you again for your  
2                   comments. We always appreciate -- the  
3                   Department appreciates the public's comments  
4                   on these matters.

5                   Megan, if you would go ahead and  
6                   reassign me as the host, we will go ahead and  
7                   conclude this portion of tonight's  
8                   proceedings.

9                   Again, the record will remain open  
10                  through November 11th for comments regarding  
11                  specifically 7 Delaware Admin Code 1130. We  
12                  will close the record at that time with  
13                  regard to receipt of public comment, and then  
14                  the Department will begin its review of the  
15                  comments received.

16                  At this point I am going to  
17                  literally bang the gavel and conclude this  
18                  portion of the hearing.

19                  But if you guys still want to the  
20                  hear about the other two amendments, don't  
21                  log off. Just hang tight, and we will reopen  
22                  with a brand new set regarding the next step.

23                  So the hearing with regard to the  
24                  Department's proposed amendments to 7

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Delaware Admin Code 1130, Title V, State  
Operating Permit Program is hereby adjourned.  
And the court reporter should stop that  
transcript at that time.

(Concluded at 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 2nd day of November 2021.



\_\_\_\_\_  
Lorena J. Hartnett  
Registered Professional Reporter

Title V State Operating Permit Program - October 27, 2021

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