

In the Matter Of:

Department of Natural Resources & Environmental Control

7 DE ADMIN. CODE 1131 HEARING

September 29, 2022



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
24

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

RE: Motor Vehicle Emissions Inspections Program
7 De Admin. Code 1131
"Low Enhanced Inspection and Maintenance
Program -- Kent and New Castle Counties"

..

Virtual Public Hearing #2
Dial-In Number: 1-408-418-9388
Event Number: 2339 665 6055

Thursday, September 29, 2022
6:29 p.m.

..

BEFORE: Theresa Newman, Hearing Officer
FOR THE DIVISION: James Coverdale, DNREC

-- Transcript of Proceedings --

WILCOX & FETZER
Registered Professional Reporters
1330 King Street - Wilmington, Delaware 19801
(302) 655-0477

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

TABLE OF CONTENTS

	Page
Introduction by Ms. Newman	3
Presentation by James Coverdale	9
Entry of Exhibits 1 through 34	23
Conclusory Remarks by Ms. Newman	28
Certificate of Reporter	30

1 MS. NEWMAN: All right. We will
2 now begin the hearing for Docket Number
3 2022-R-A-0002. The date is Thursday,
4 September 29, 2022.

5 We are here this evening to provide
6 a virtual platform for the State of
7 Delaware's Department of Natural Resources
8 and Environmental Control to conduct its
9 virtual public hearing on the proposed
10 revisions to 7 DE Admin Code 1131, Low
11 Enhanced Inspection and Maintenance Program,
12 Kent and New Castle Counties.

13 My name is Theresa Newman, and
14 Secretary Garvin has appointed me to serve as
15 the hearing officers for tonight's formal
16 proceeding.

17 First and foremost, this hearing is
18 being conducted virtually. No one is
19 together in the same room. Everyone is
20 participating independently at their own
21 respective locations. While we are not
22 physically gathered tonight, WebEx does
23 generate a list of those that are virtually
24 present for this proceeding so the Department

1 will still have a record of those who have
2 electronically joined at this event.

3 At the conclusion of the
4 introductory remarks, I will be turning the
5 hearing over to Department staff to provide
6 their presentation for the record being
7 generated in this matter.

8 Whereas the Department would then
9 open the verbal comment portion of the
10 hearing following the Department's
11 presentation, the Department did not receive
12 registration for verbal comment for this
13 hearing.

14 It is important to note that the
15 Department offered the opportunity for verbal
16 comment, as noticed in the legal ads and
17 online. Those that would have wished to
18 provide a verbal comment would have had to
19 register by 12:00 p.m. today, to which there
20 were no registrants by that time.

21 There is a court reporter virtually
22 present, who will prepare a verbatim
23 transcript of this hearing pursuant to the
24 statutory requirement for DNREC to have the

1 same prepared. And, as always, that
2 transcript will be posted on the hearing
3 webpage dedicated to this matter as soon as
4 it is received.

5 In addition, I would encourage
6 those who are attending tonight's hearing to
7 also visit the hearing webpage dedicated to
8 this matter for additional details concerning
9 the proposed regulatory matter.

10 The hearing webpage can be found
11 online under the Administrative Law Section
12 of DNREC's webpage that will be listed at the
13 conclusion of tonight's hearing.

14 Before we begin the presentation
15 tonight, please be advised that the following
16 protocols remain in place for all DNREC
17 public hearings:

18 All comment received must be
19 limited solely to the subject matter of
20 tonight's hearing. All comments pertinent to
21 the subject matter of this virtual hearing
22 will be incorporated into the record being
23 generated in this matter.

24 In order to ensure that everyone

1 who wishes to offer comment for the
2 Secretary's consideration is accommodated,
3 the record in this matter shall remain open
4 for a minimum of 15 days following tonight's
5 proceedings.

6 There is only one authentic record
7 of the formal proceeding tonight, and it is
8 the official court reporter's verbatim
9 transcript.

10 The statutory purpose of tonight's
11 hearing is to build a record with regard to
12 the Department's proposed actions.

13 A record consisting of the
14 transcript of this hearing tonight, all
15 written comments, all exhibits, and
16 eventually the Hearing Officer's Report will
17 be reviewed by Secretary Garvin.

18 The Secretary will ultimately issue
19 an order following the review process
20 containing his decision on this matter and
21 the reasons therefor.

22 Per DNREC's standard hearing
23 protocols, there will be no Q and A or chat
24 session permitted during the hearing.

1 It is important to note that no
2 decision has already been made by the
3 Department, nor will any decision be made
4 tonight with regard to the proposed
5 regulatory matter.

6 As previously stated, DNREC wishes
7 to ensure that everyone is enabled to offer
8 their comments for inclusion into the record
9 being generated.

10 In light of the Administrative
11 Procedures Act, the Department is required
12 to, at a minimum, provide a comment period of
13 a minimum of 15 days after the hearing. As
14 noticed in legal ads and online, the
15 Department stated the public comment period
16 will be open through Friday, October 14,
17 2022.

18 Comments may be submitted through a
19 comment form link on the hearing webpage, via
20 e-mail to DNRECHearingComments@delaware.gov,
21 or via the U.S. Postal Service at the
22 physical address for DNREC indicated on the
23 hearing webpage and for the public notices
24 issued in this matter.

1 Written comments to DNREC may not
2 be submitted using social media platforms
3 such as Twitter, Facebook, YouTube or text
4 messaging.

5 Please remember that all comment
6 received either through USPS or via the
7 electronic mechanisms noted just now, as long
8 as received by the Department on or before
9 October 14th, will bear the exact same weight
10 and will be considered equally by the
11 Secretary prior to making a final decision in
12 this matter.

13 Lastly, the ultimate decision
14 regarding this matter is made by DNREC's
15 Secretary Garvin. The formal hearing tonight
16 acts as a mechanism to enable the Department
17 to thoroughly vet the regulatory matter to
18 the public and to let the public know the
19 various ways to which comment may be
20 submitted for Secretary Garvin's
21 consideration.

22 I will now hand it over to James
23 Coverdale with the Division of Air Quality to
24 provide the Department's presentation.

1 MR. COVERDALE: Good evening. My
2 name is James Coverdale. I am an
3 Environmental Program Manager with the
4 Division of Air Quality in the Department of
5 Natural Resources and Environmental Control.

6 The purpose of our second public
7 hearing this evening is to receive public
8 comments on 7 Delaware Administrative Code
9 1131, Low Enhanced Inspection Maintenance
10 Program, Kent and New Castle Counties, Docket
11 Number 2022-R-A-0002.

12 The objective of the amendments to
13 7 Delaware Administrative Code 1131, Low
14 Enhanced Inspection and Maintenance Program,
15 Kent and New Castle Counties, is to expand
16 the model-year exemption from five to seven
17 years, expand the vehicles covered by the
18 program to include vehicles weighing
19 8,501 pounds to 14,000 pounds gross vehicle
20 weight, beginning with model year 2008;
21 change the older vehicle testing requirements
22 to include curb idle and gas cap tests; and
23 remove the two-speed idle test; and four, add
24 anti-tampering language.

1 The amendments maintain consistency
2 with current Federal and State regulations:

3 40 Code of Federal Regulations 50
4 Subpart S, Inspection and Maintenance; the
5 Clean Air Act, 42 United States Code 7522(a)
6 Section 203; and 21 Delaware Code, Chapter
7 21, Registration of Vehicles, Section 2109,
8 Section 2110, and Section 2143.

9 The vehicle inspection and
10 maintenance program is a mandated requirement
11 of the Clean Air Act for any area classified
12 as severe or above.

13 New Castle County was designated as
14 non-attainment with its classification being
15 severe under the one-hour ozone standard. A
16 Low Enhanced Inspection and Maintenance
17 Testing Program was implemented because
18 Delaware is included in the Philadelphia,
19 Camden, Wilmington Metropolitan statistical
20 area with a population over 200,000.

21 The vehicle inspection and
22 maintenance program was implemented in New
23 Castle and Kent to help improve air quality
24 by identifying high-emitting vehicles and

1 requiring them to be repaired. Owners of
2 vehicles with high emissions are notified to
3 make repairs so that the emissions are within
4 the National Ambient Air Quality Standards.

5 The inspection and maintenance
6 program for Kent and New Castle Counties help
7 improve air quality standards by identifying
8 high-emitting vehicles that are required to
9 be repaired.

10 Vehicles are required to be tested
11 every two years at the Division of Motor
12 Vehicle as part of the vehicle registration
13 or renewal process.

14 The emissions testing is performed
15 on all gasoline and diesel-powered light-duty
16 vehicles weighing up to 8,500 pounds.

17 Vehicles 1967 and older, no emissions test is
18 performed. Vehicles 1968 through 1980, idle
19 test is required. 1981 through 1995, a
20 two-speed idle test, gas cap test, and a tank
21 pressure test is required. Vehicles 1996 to
22 the newest five model years receive an
23 onboard diagnostic test. The newest five
24 model years are exempt.

1 Vehicles with excess emissions or
2 malfunctioning emission controls systems are
3 required to be repaired to be eligible for an
4 emissions waiver. For vehicles 1968 through
5 1980, vehicle owners must spend at least \$75
6 on emissions-related repairs.

7 Vehicles 1981 or newer, registered
8 in Kent and New Castle County, must spend a
9 fixed amount of emissions-related repairs to
10 qualify for a waiver. The waivers threshold
11 is consistent with 40 CFR 51. The threshold
12 is calculated by averaging consumer price
13 index data for a basket of all goods. The
14 current amount for 2022 is \$978, and it does
15 increase annually.

16 On June 20th of 2017, House Bill
17 246 was introduced at the General Assembly
18 and was signed into law on September 21, 2017
19 by Governor Carney. The House Bill was
20 introduced to enhance the customer service
21 experience for all Delaware drivers by
22 increasing the inspection exemptions from
23 five to seven years for all new vehicles.

24 This exemption applies to vehicles

1 purchased after January 1st of 2012. The
2 legislation reduced the number of inspections
3 by approximately 40,000 -- 45,000 vehicles,
4 allowing owners of vehicles with a current
5 five-year expiration to easily renew their
6 registration for an additional two years
7 within 90 days of registration expiration.

8 Even though this helped to
9 streamline the testing process at the
10 Division of Motor Vehicle, the extension of
11 vehicles from five to seven years resulted in
12 emissions increases in the entire inspection
13 and maintenance program and created air
14 quality attainment problems.

15 The result of the legislation left
16 no emissions benefits in Sussex County and a
17 deficit in Kent and New Castle Counties.

18 Delaware is required by the EPA to
19 demonstrate an air quality benefit statewide.
20 By modifying the inspection and maintenance
21 program in all three counties, Delaware is
22 effectively able to apply emission reduction
23 credits from Sussex County to the deficit in
24 Kent and New Castle Counties to meet

1 Delaware's air quality goals.

2 The Department initiated Start
3 Action Notice 2018-05 to implement changes to
4 Regulation 1131. The Start Action Notice was
5 approved by the Department, the Secretary,
6 and notification was sent to the General
7 Assembly on April 18, 2018.

8 The Department prepared some draft
9 amendments to 1131 for a May 23, 2018 public
10 workshop, and public comments were requested.

11 The Division of Air Quality worked
12 with the Division of Motor Vehicle on
13 suggested regulatory language. The Division
14 of Air Quality also conducted several
15 modeling scenarios using EPA's motor vehicle
16 emission simulator to support the inspection
17 and maintenance program. The modeling will
18 be presented on another slide.

19 The Department also presented the
20 information at public workshops held on
21 May 25th of 2022 at 10:00 a.m. and 6:00 p.m.
22 Comments were again requested. The
23 Department published these proposed
24 amendments in the September 1st of 2022

1 Delaware Register.

2 By exempting two model years of
3 vehicles from the program, passage of House
4 Bill 246 caused an emission increase of
5 17 tons of nitrogen oxides, NOx, and 12.9
6 tons of volatile organic compounds, VOCs, in
7 the programs for New Castle and Kent County.

8 Sussex County experienced zero
9 increases of NOx, but a 1.7-ton increase in
10 VOCs. Delaware must demonstrate to the EPA
11 that revisions to regulations do not
12 interfere with the attainment and maintenance
13 of any of the National Ambient Air Quality
14 Standards in effect at the time of revision.

15 Due to an increase in pollution
16 resulting from the legislative mandate, House
17 Bill 246, the Division of Air Quality's
18 Division staff analyzed several scenarios to
19 offset emissions increases. The Department
20 worked with the Division of Motor Vehicles to
21 identify program options to solve the
22 increases realized by the expansion of the
23 vehicles exempt from receiving the vehicle
24 emissions test.

1 In the course of those discussions,
2 the Division of Motor Vehicles further
3 requested the two-speed idle test be
4 eliminated for older vehicles in Kent and New
5 Castle Counties.

6 In order to account for the
7 emission increases attributed to the
8 legislation and the Division of Motor Vehicle
9 request, the Department modeled several
10 scenarios using EPA's motor vehicle emission
11 -- vehicle emission simulator 2014B in order
12 to establish a cohesive statewide emissions
13 inspection and maintenance program and
14 present the Division recommendations to the
15 Department and to the Department of
16 Transportation's senior leadership for
17 consideration.

18 Following consultation with the
19 staff at Region 3 Environmental Protection
20 Agency, Region 3 staff agreed that the
21 emission reduction attributed to an onboard
22 diagnostic testing program at Sussex County
23 could be used to offset, in part, the
24 emission increases attributed to the vehicle

1 exemptions.

2 Considering the input from the EPA
3 and the Division of Motor Vehicles, the
4 Department modeled and analyzed the seven
5 following cases:

6 Case 1 established a model baseline
7 for the program with the five-year exemption.
8 This baseline was used to compare changes in
9 emissions from the different modeling cases.

10 Case 2 demonstrates the impact of
11 House Bill 246 with the emission increases of
12 17 tons of NOx and 14.6 tons of VOCs combined
13 for all three counties.

14 These increases would interfere
15 with the attainment and maintenance of the
16 current National Ambient Air Quality
17 Standard.

18 Case 3 modeled the testing
19 requirements of an onboard diagnostic test
20 for vehicles up to 14,000 pounds, a
21 single-speed idle test for vehicles up to
22 8,500 pounds, and a seven-model-year
23 exemption.

24 The modeling for Sussex County

1 demonstrated emission reductions, but in New
2 Castle and Kent demonstrated an increase to
3 both NOx and VOCs in excess of the increase
4 from the exemption extension.

5 Case 4 modeled the testing
6 requirements of an onboard diagnostic test
7 for vehicles up to 14,000 pounds, a two-speed
8 idle test for vehicles up to 8,500 pounds,
9 and the seven-model-year exemption.

10 For Sussex County, this model case
11 deviated from the baseline model, as Sussex
12 County does not currently have a two-speed
13 idle test.

14 Case 5 modeled for an onboard
15 diagnostic test for vehicles up to
16 8,500 pounds and no testing of pre 1996
17 vehicles.

18 This case resulted in a substantial
19 increase in VOCs in New Castle and Kent
20 Counties above the emission increases from
21 House Bill 246.

22 The reduction in Sussex County was
23 not sufficient to overcome the increase in
24 Kent and New Castle Counties.

1 Case 6 modeled for an onboard
2 diagnostic test for vehicles up to
3 14,000 pounds and no testing of pre 1996
4 vehicles.

5 Similar to Case 5, this case also
6 resulted in an increase in VOCs in New Castle
7 and Kent Counties above the emission
8 increases from the exemption extension. The
9 reduction in Sussex County was not sufficient
10 to overcome the increases in Kent and New
11 Castle Counties.

12 Case 7 modeled the testing
13 requirements of an onboard diagnostic test
14 for vehicles up to 14,000 pounds, a
15 single-speed idle test and gas cap test for
16 vehicles up to 8,500 pounds, and the
17 seven-model-year exemption.

18 Emission reductions from Sussex
19 County was sufficient to cover the emission
20 increases in Kent and New Castle Counties.

21 Case 7 was selected and included in
22 the revision to 7 Delaware Administrative
23 Code 1131, as it demonstrates to the EPA that
24 this revision will not interfere with

1 attainment and maintenance of any National
2 Ambient Air Quality Standard in effect at the
3 time of the revision and incorporates the
4 Division of Motor Vehicle's request to
5 eliminate the two-speed idle test.

6 The proposed amendments and current
7 proper vehicle maintenance and discourage
8 tampering of vehicle emission controls by
9 vehicle owners.

10 Reducing vehicle emissions to
11 improve air quality will help maintain a
12 healthy environment and help improve
13 health-related impacts.

14 The proposed amendments will also
15 ensure Delaware vehicle owners comply with
16 the Federal Clean Air Act requirements and
17 the EPA Vehicle Emission Standards.

18 Once vehicle owners ensure that
19 their vehicles are fixed and within standard,
20 people may begin to notice spending less at
21 the pump, less hospital visits for
22 respiratory related problems, and cleaner air
23 quality.

24 To comply with House Bill 246

1 legislation, the Department proposed
2 amendments to expand the model year exemption
3 of vehicles from five years to seven years to
4 meet the performance standard.

5 To meet the emission credits
6 shortfall in the inspection and maintenance
7 program in Kent and New Castle County, the
8 Department proposed amendments to change the
9 older vehicle testing requirements to include
10 curb idle and gas cap as an additional
11 inspection to make sure the vehicle has
12 catalytic converter installed.

13 The Department proposed an
14 expansion for vehicle model year 2008 and
15 newer by increasing the weight of the
16 vehicles that must get an onboard diagnostic
17 test for all light-duty and medium-duty
18 gasoline and diesel vehicles weighing 8,501
19 pounds up to 14,000 pounds to provide
20 additional emission credits.

21 The onboard diagnostic tests can
22 detect where an emission problem occurs in a
23 vehicle and can identify what components or
24 systems need fixing.

1 The Division of Motor Vehicles
2 requested that the two-speed idle test be
3 removed and replaced with curb idle tests and
4 that the tank pressure test was removed.

5 Additionally, the Department has
6 proposed the onboard diagnostic test in
7 Sussex County and to continue with the
8 onboard diagnostic test in Kent and New
9 Castle County, because vehicle migration data
10 shows that a vehicle registered in one county
11 often travel to and/or through both the
12 remaining counties in the state on a daily
13 basis, which means that the emissions
14 affecting one county affect the remaining two
15 counties.

16 The Clean Air Act, Section 203(a),
17 gives the United States Environmental
18 Protection Agency the authority to enforce
19 tampering violations.

20 The Division of Air Quality is
21 amending Regulation 1131 to include new
22 language to address the sale and use of
23 illegal defeat devices.

24 Additionally, the Department

1 identified some non-substantive amendments.
2 These amendments are included in an errata
3 table for 1131.

4 Now we would like to enter 34
5 exhibits shown on the following seven slides
6 into the public record to support the
7 proposed amendments to 7 Delaware
8 Administrative Code 1131, Low Enhanced
9 Inspection and Maintenance Program, Kent and
10 New Castle Counties, Docket Number
11 2022-R-A-0002.

12 Exhibit 1: Department Technical
13 Support Document.

14 Exhibit 2: 40 CFR Subpart S
15 Inspection/Maintenance Program Requirements.

16 Exhibit 3: Delaware Code Section
17 2109, period of registration effective date.

18 Exhibit 4: 21 Delaware Code 2110,
19 renewal of registration new car and plate,
20 cancellation of renewal by owner prior to
21 effective date.

22 Exhibit 5: 21 Delaware Code 2143,
23 inspection of motor vehicle before
24 registration, exception vehicle outside

1 state.

2 Exhibit 6: Delaware House Bill
3 246.

4 Exhibit 7: Start Action Notice
5 2018-04 approved by the Department Secretary
6 on April 12, 2018.

7 Exhibit 8: Memo to General
8 Assembly from the Office of the Secretary
9 announcing the Start Action Notice 2018-04
10 dated April 12, 2018.

11 Exhibit 9: Affidavit and legal
12 notice in the April 29, 2018 Delaware State
13 News that advertised the May 23, 2018 public
14 workshop.

15 Exhibit 10: Affidavit for the
16 April 29, 2018 News Journal that advertised
17 the May 23, 2018 public workshop.

18 Exhibit 11: Legal notice for the
19 April 29, 2018 News Journal that advertised
20 the May 23, 2018 public workshop.

21 Exhibit 12: Register Notice for 7
22 Delaware Administrative Code 1131, published
23 in the Delaware Register of Regulations on
24 September 1, 2022.

1 Exhibit 13: Proposed amendments to
2 7 Delaware Administrative Code 1131 published
3 in the Delaware Register of Regulations on
4 September 1, 2022.

5 Exhibit 14: Department
6 presentation for the May 23, 2018 public
7 workshop.

8 Exhibit 15: Department sign-in
9 sheet for the May 23, 2018 public workshop.

10 Exhibit 16: Affidavit for the
11 May 1, 2022 Delaware State News that
12 advertised the 10:00 a.m. and 6:00 p.m.
13 May 25, 2022 public workshops.

14 Exhibit 17: Legal notice for the
15 May 1, 2022 Delaware State News that
16 advertised the 10:00 a.m. and 6:00 p.m. on
17 May 25, 2022 public workshops.

18 Exhibit 18: Affidavit for the
19 May 23 Cape Gazette that advertised the
20 10:00 a.m. and 6 p.m. May 25, 2022 public
21 workshops.

22 Exhibit 19: Legal notice in the
23 May 3, 2022 Cape Gazette that advertised the
24 10:00 a.m. and 6:00 p.m. May 25, 2022 public

1 workshops.

2 Exhibit 20: Notice for public
3 workshops on the Delaware State Public
4 Meeting Calendar, September 19, 2022.

5 Exhibit 21: Department news
6 release published on May 13, 2022 announcing
7 DNREC to update vehicle emission testing
8 requirements.

9 Exhibit 22: Department
10 presentation given at the 10:00 a.m. and
11 6:00 p.m. virtual public workshops held on
12 May 25, 2022.

13 Exhibit 23: Department sign-in
14 sheets from the 10:00 a.m. virtual public
15 workshop held on May 25, 2022.

16 Exhibit 24: Department sign-in
17 sheet from the 6:00 p.m. virtual public
18 workshop held on May 25, 2022.

19 Exhibit 25: Department survey and
20 response summary from the 10:00 a.m. and
21 6:00 p.m. virtual public workshops held on
22 May 25, 2022.

23 Exhibit 26: Affidavit from the
24 Delaware State News dated August 28, 2022

1 that advertised today's hearing.

2 Exhibit 27: Legal notice from the
3 Delaware State News dated August 28, 2022
4 that advertises today's hearing.

5 Exhibit 28: Affidavit from the
6 News Journal dated August 28, 2022 that
7 advertised today's hearing.

8 Exhibit 29: Legal notice from the
9 News Journal dated August 28, 2022 that
10 advertised today's hearing.

11 Exhibit 30: Notice for today's
12 hearing on the Delaware State Public Meetings
13 Calendar dated August 28, 2022.

14 Exhibit 31: Legal notice for
15 today's hearing, as posted on the website for
16 DNREC public hearings, dated August 28, 2022.

17 Exhibit 32: Regulatory Flexibility
18 Analysis and Impact Statement Form, published
19 in Delaware Register of Regulations,
20 September 1, 2022.

21 Exhibit 33: Errata table for
22 non-substantive changes.

23 Exhibit 34: The Department's
24 presentation at today's hearing.

1 The Department would like to thank
2 you for joining us in this public hearing for
3 7 Delaware Administrative Code 1131, Motor
4 Vehicle Emissions Inspection Program, Docket
5 2022-R-A-0002.

6 Comments may be submitted in
7 writing using the online form at
8 delaware.gov/DNREC Comments, or via e-mail to
9 DNRECHearingComments@delaware.gov, or by U.S.
10 mail to Theresa Newman, Hearing Officer,
11 DNREC Office of the Secretary, 89 Kings
12 Highway, Dover, Delaware 19901.

13 The public record will remain open
14 until October 14, 2022. This concludes the
15 Department's presentation.

16 MS. NEWMAN: Thank you,
17 Mr. Coverdale. As you read off the
18 Department's exhibit, I do hereby mark those
19 exhibits as Department's Exhibits 1 through
20 34.

21 And, again, the hearing record will
22 remain open through Friday, October 14, 2022.
23 I want to thank you all for attending the
24 virtual hearing in the matter of Docket

1 Number 2022-R-A-0002.

2 The hearing is now concluded at

3 6:59 p.m.

4 (Concluded at 6:59 p.m.)

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

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 5th day of October 2022.



Lorena J. Hartnett
Registered Professional Reporter

7 De Admin. Code 1131 Hearing - September 29, 2022

<hr/> \$ <hr/>	<hr/> 2 <hr/>	<hr/> 30 27:11 <hr/>
\$75 12:5	2 17:10 23:14	31 27:14
\$978 12:14	20 26:2	32 27:17
<hr/> 1 <hr/>	200,000 10:20	33 27:21
1 17:6 23:12 24:24 25:4,11,15 27:20 28:19	2008 9:20 21:14	34 23:4 27:23 28:20
1.7-ton 15:9	2012 13:1	<hr/> 4 <hr/>
10 24:15	2014B 16:11	4 18:5 23:18
10:00 14:21 25:12,16,20,24 26:10,14, 20	2017 12:16,18	40 10:3 12:11 23:14
11 24:18	2018 14:7,9 24:6,10,12,13,16,17,19, 20 25:6,9	40,000 13:3
1131 3:10 9:9,13 14:4,9 19:23 22:21 23:3,8 24:22 25:2 28:3	2018-04 24:5,9	42 10:5
12 24:6,10,21	2018-05 14:3	45,000 13:3
12.9 15:5	2022 3:4 7:17 12:14 14:21,24 24:24 25:4,11,13,15,17,20,23,24 26:4,6,12, 15,18,22,24 27:3,6,9,13,16,20 28:14, 22	<hr/> 5 <hr/>
12:00 4:19	2022-R-A-0002 3:3 9:11 23:11 28:5	5 18:14 19:5 23:22
13 25:1 26:6	203 10:6	50 10:3
14 7:16 25:5 28:14,22	203(a) 22:16	51 12:11
14,000 9:19 17:20 18:7 19:3,14 21:19	20th 12:16	<hr/> 6 <hr/>
14.6 17:12	21 10:6,7 12:18 23:18,22 26:5	6 19:1 24:2 25:20
14th 8:9	2109 10:7 23:17	6:00 14:21 25:12,16,24 26:11,17,21
15 6:4 7:13 25:8	2110 10:8 23:18	<hr/> 7 <hr/>
16 25:10	2143 10:8 23:22	7 3:10 9:8,13 19:12,21,22 23:7 24:4, 21 25:2 28:3
17 15:5 17:12 25:14	22 26:9	7522(a) 10:5
18 14:7 25:18	23 14:9 24:13,17,20 25:6,9,19 26:13	<hr/> 8 <hr/>
19 25:22 26:4	24 26:16	8 24:7
1967 11:17	246 12:17 15:4,17 17:11 18:21 20:24 24:3	8,500 11:16 17:22 18:8,16 19:16
1968 11:18 12:4	25 25:13,17,20,24 26:12,15,18,19,22	8,501 9:19 21:18
1980 11:18 12:5	25th 14:21	89 28:11
1981 11:19 12:7	26 26:23	<hr/> 9 <hr/>
19901 28:12	27 27:2	9 24:11
1995 11:19	28 26:24 27:3,5,6,9,13,16	90 13:7
1996 11:21 18:16 19:3	29 3:4 24:12,16,19 27:8	
1st 13:1 14:24	<hr/> 3 <hr/>	
	3 16:19,20 17:18 23:16 25:23	

<hr/> A <hr/>	<p>analyzed 15:18 17:4</p> <p>and/or 22:11</p> <p>announcing 24:9 26:6</p> <p>annually 12:15</p> <p>anti-tampering 9:24</p> <p>applies 12:24</p> <p>apply 13:22</p> <p>appointed 3:14</p> <p>approved 14:5 24:5</p> <p>approximately 13:3</p> <p>April 14:7 24:6,10,12,16,19</p> <p>area 10:11,20</p> <p>Assembly 12:17 14:7 24:8</p> <p>attainment 13:14 15:12 17:15 20:1</p> <p>attending 5:6 28:23</p> <p>attributed 16:7,21,24</p> <p>August 26:24 27:3,6,9,13,16</p> <p>authentic 6:6</p> <p>authority 22:18</p> <p>averaging 12:12</p>	<p>Camden 10:19</p> <p>cancellation 23:20</p> <p>cap 9:22 11:20 19:15 21:10</p> <p>Cape 25:19,23</p> <p>car 23:19</p> <p>Carney 12:19</p> <p>case 17:6,10,18 18:5,10,14,18 19:1,5,12,21</p> <p>cases 17:5,9</p> <p>Castle 3:12 9:10,15 10:13,23 11:6 12:8 13:17,24 15:7 16:5 18:2,19,24 19:6,11,20 21:7 22:9 23:10</p> <p>catalytic 21:12</p> <p>caused 15:4</p> <p>CFR 12:11 23:14</p> <p>change 9:21 21:8</p> <p>Chapter 10:6</p> <p>chat 6:23</p> <p>classification 10:14</p> <p>classified 10:11</p> <p>Clean 10:5,11 20:16 22:16</p> <p>cleaner 20:22</p> <p>Code 3:10 9:8,13 10:3,5,6 19:23 23:8,16,18,22 24:22 25:2 28:3</p> <p>cohesive 16:12</p> <p>combined 17:12</p> <p>comment 4:9,12,16,18 5:18 6:1 7:12,15,19 8:5,19</p> <p>comments 5:20 6:15 7:8,18 8:1 9:8 14:10,22 28:6,8</p> <p>compare 17:8</p> <p>comply 20:15,24</p> <p>components 21:23</p> <p>compounds 15:6</p> <p>concludes 28:14</p> <p>conclusion 4:3 5:13</p> <p>conduct 3:8</p> <p>conducted 3:18 14:14</p> <p>consideration 6:2 8:21 16:17</p>
	<hr/> B <hr/>	
	<p>baseline 17:6,8 18:11</p> <p>basis 22:13</p> <p>basket 12:13</p> <p>bear 8:9</p> <p>begin 3:2 5:14 20:20</p> <p>beginning 9:20</p> <p>benefit 13:19</p> <p>benefits 13:16</p> <p>Bill 12:16,19 15:4,17 17:11 18:21 20:24 24:2</p> <p>build 6:11</p>	
	<hr/> C <hr/>	
<p>a.m. 14:21 25:12,16,20,24 26:10,14,20</p> <p>accommodated 6:2</p> <p>account 16:6</p> <p>Act 7:11 10:5,11 20:16 22:16</p> <p>Action 14:3,4 24:4,9</p> <p>actions 6:12</p> <p>acts 8:16</p> <p>add 9:23</p> <p>addition 5:5</p> <p>additional 5:8 13:6 21:10,20</p> <p>Additionally 22:5,24</p> <p>address 7:22 22:22</p> <p>Admin 3:10</p> <p>Administrative 5:11 7:10 9:8,13 19:22 23:8 24:22 25:2 28:3</p> <p>ads 4:16 7:14</p> <p>advertised 24:13,16,19 25:12,16,19,23 27:1,7,10</p> <p>advertises 27:4</p> <p>advised 5:15</p> <p>affect 22:14</p> <p>affecting 22:14</p> <p>Affidavit 24:11,15 25:10,18 26:23 27:5</p> <p>Agency 16:20 22:18</p> <p>agreed 16:20</p> <p>air 8:23 9:4 10:5,11,23 11:4,7 13:13,19 14:1,11,14 15:13,17 17:16 20:2,11,16,22 22:16,20</p> <p>allowing 13:4</p> <p>Ambient 11:4 15:13 17:16 20:2</p> <p>amending 22:21</p> <p>amendments 9:12 10:1 14:9,24 20:6,14 21:2,8 23:1,2,7 25:1</p> <p>amount 12:9,14</p> <p>Analysis 27:18</p>	<p>calculated 12:12</p> <p>Calendar 26:4 27:13</p>	

<p>considered 8:10</p> <p>consistency 10:1</p> <p>consistent 12:11</p> <p>consisting 6:13</p> <p>consultation 16:18</p> <p>consumer 12:12</p> <p>continue 22:7</p> <p>Control 3:8 9:5</p> <p>controls 12:2 20:8</p> <p>converter 21:12</p> <p>counties 3:12 9:10,15 11:6 13:17,21, 24 16:5 17:13 18:20,24 19:7,11,20 22:12,15 23:10</p> <p>county 10:13 12:8 13:16,23 15:7,8 16:22 17:24 18:10,12,22 19:9,19 21:7 22:7,9,10,14</p> <p>court 4:21 6:8</p> <p>cover 19:19</p> <p>Coverdale 8:23 9:1,2 28:17</p> <p>covered 9:17</p> <p>created 13:13</p> <p>credits 13:23 21:5,20</p> <p>curb 9:22 21:10 22:3</p> <p>current 10:2 12:14 13:4 17:16 20:6</p> <p>customer 12:20</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>daily 22:12</p> <p>data 12:13 22:9</p> <p>date 3:3 23:17,21</p> <p>dated 24:10 26:24 27:3,6,9,13,16</p> <p>days 6:4 7:13 13:7</p> <p>DE 3:10</p> <p>decision 6:20 7:2,3 8:11,13</p> <p>dedicated 5:3,7</p> <p>defeat 22:23</p> <p>deficit 13:17,23</p> <p>Delaware 9:8,13 10:6,18 12:21 13:18,21 15:1,10 19:22 20:15 23:7,</p>	<p>16,18,22 24:2,12,22,23 25:2,3,11,15 26:3,24 27:3,12,19 28:3,12</p> <p>Delaware's 3:7 14:1</p> <p>delaware.gov/dnrec 28:8</p> <p>demonstrate 13:19 15:10</p> <p>demonstrated 18:1,2</p> <p>demonstrates 17:10 19:23</p> <p>Department 3:7,24 4:5,8,11,15 7:3, 11,15 8:8,16 9:4 14:2,5,8,19,23 15:19 16:9,15 17:4 21:1,8,13 22:5,24 23:12 24:5 25:5,8 26:5,9,13,16,19 28:1</p> <p>Department's 4:10 6:12 8:24 27:23 28:15,18,19</p> <p>designated 10:13</p> <p>details 5:8</p> <p>detect 21:22</p> <p>deviated 18:11</p> <p>devices 22:23</p> <p>diagnostic 11:23 16:22 17:19 18:6, 15 19:2,13 21:16,21 22:6,8</p> <p>diesel 21:18</p> <p>diesel-powered 11:15</p> <p>discourage 20:7</p> <p>discussions 16:1</p> <p>Division 8:23 9:4 11:11 13:10 14:11, 12,13 15:17,18,20 16:2,8,14 17:3 20:4 22:1,20</p> <p>DNREC 4:24 5:16 7:6,22 8:1 26:7 27:16 28:11</p> <p>DNREC's 5:12 6:22 8:14</p> <p>DNRECHEARINGCOMMENTS@ DELAWARE.GOV 7:20 28:9</p> <p>Docket 3:2 9:10 23:10 28:4,24</p> <p>Document 23:13</p> <p>Dover 28:12</p> <p>draft 14:8</p> <p>drivers 12:21</p> <p>Due 15:15</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p>e-mail 7:20 28:8</p>	<p>easily 13:5</p> <p>effect 15:14 20:2</p> <p>effective 23:17,21</p> <p>effectively 13:22</p> <p>electronic 8:7</p> <p>electronically 4:2</p> <p>eligible 12:3</p> <p>eliminate 20:5</p> <p>eliminated 16:4</p> <p>emission 12:2 13:22 14:16 15:4 16:7,10,11,21,24 17:11 18:1,20 19:7, 18,19 20:8,17 21:5,20,22 26:7</p> <p>emissions 11:2,3,14,17 12:1,4 13:12,16 15:19,24 16:12 17:9 20:10 22:13 28:4</p> <p>emissions-related 12:6,9</p> <p>enable 8:16</p> <p>enabled 7:7</p> <p>encourage 5:5</p> <p>enforce 22:18</p> <p>enhance 12:20</p> <p>Enhanced 3:11 9:9,14 10:16 23:8</p> <p>ensure 5:24 7:7 20:15,18</p> <p>enter 23:4</p> <p>entire 13:12</p> <p>environment 20:12</p> <p>Environmental 3:8 9:3,5 16:19 22:17</p> <p>EPA 13:18 15:10 17:2 19:23 20:17</p> <p>EPA's 14:15 16:10</p> <p>equally 8:10</p> <p>errata 23:2 27:21</p> <p>establish 16:12</p> <p>established 17:6</p> <p>evening 3:5 9:1,7</p> <p>event 4:2</p> <p>eventually 6:16</p> <p>exact 8:9</p> <p>exception 23:24</p>
---	---	--

<p>excess 12:1 18:3</p> <p>exempt 11:24 15:23</p> <p>exempting 15:2</p> <p>exemption 9:16 12:24 17:7,23 18:4, 9 19:8,17 21:2</p> <p>exemptions 12:22 17:1</p> <p>exhibit 23:12,14,16,18,22 24:2,4,7, 11,15,18,21 25:1,5,8,10,14,18,22 26:2,5,9,13,16,19,23 27:2,5,8,11,14, 17,21,23 28:18</p> <p>exhibits 6:15 23:5 28:19</p> <p>expand 9:15,17 21:2</p> <p>expansion 15:22 21:14</p> <p>experience 12:21</p> <p>experienced 15:8</p> <p>expiration 13:5,7</p> <p>extension 13:10 18:4 19:8</p> <hr/> <p style="text-align: center;">F</p> <hr/> <p>Facebook 8:3</p> <p>Federal 10:2,3 20:16</p> <p>final 8:11</p> <p>five-year 13:5 17:7</p> <p>fixed 12:9 20:19</p> <p>fixing 21:24</p> <p>Flexibility 27:17</p> <p>foremost 3:17</p> <p>form 7:19 27:18 28:7</p> <p>formal 3:15 6:7 8:15</p> <p>found 5:10</p> <p>Friday 7:16 28:22</p> <hr/> <p style="text-align: center;">G</p> <hr/> <p>Garvin 3:14 6:17 8:15</p> <p>Garvin's 8:20</p> <p>gas 9:22 11:20 19:15 21:10</p> <p>gasoline 11:15 21:18</p> <p>gathered 3:22</p>	<p>Gazette 25:19,23</p> <p>General 12:17 14:6 24:7</p> <p>generate 3:23</p> <p>generated 4:7 5:23 7:9</p> <p>goals 14:1</p> <p>Good 9:1</p> <p>goods 12:13</p> <p>Governor 12:19</p> <p>gross 9:19</p> <hr/> <p style="text-align: center;">H</p> <hr/> <p>hand 8:22</p> <p>health-related 20:13</p> <p>healthy 20:12</p> <p>hearing 3:2,9,15,17 4:5,10,13,23 5:2, 6,7,10,13,20,21 6:11,14,16,22,24 7:13,19,23 8:15 9:7 27:1,4,7,10,12, 15,24 28:2,10,21,24</p> <p>hearings 5:17 27:16</p> <p>held 14:20 26:11,15,18,21</p> <p>helped 13:8</p> <p>high 11:2</p> <p>high-emitting 10:24 11:8</p> <p>Highway 28:12</p> <p>hospital 20:21</p> <p>House 12:16,19 15:3,16 17:11 18:21 20:24 24:2</p> <hr/> <p style="text-align: center;">I</p> <hr/> <p>identified 23:1</p> <p>identify 15:21 21:23</p> <p>identifying 10:24 11:7</p> <p>idle 9:22,23 11:18,20 16:3 17:21 18:8,13 19:15 20:5 21:10 22:2,3</p> <p>illegal 22:23</p> <p>impact 17:10 27:18</p> <p>impacts 20:13</p> <p>implement 14:3</p> <p>implemented 10:17,22</p>	<p>important 4:14 7:1</p> <p>improve 10:23 11:7 20:11,12</p> <p>include 9:18,22 21:9 22:21</p> <p>included 10:18 19:21 23:2</p> <p>inclusion 7:8</p> <p>incorporated 5:22</p> <p>incorporates 20:3</p> <p>increase 12:15 15:4,9,15 18:2,3,19, 23 19:6</p> <p>increases 13:12 15:9,19,22 16:7,24 17:11,14 18:20 19:8,10,20</p> <p>increasing 12:22 21:15</p> <p>independently 3:20</p> <p>index 12:13</p> <p>information 14:20</p> <p>initiated 14:2</p> <p>input 17:2</p> <p>inspection 3:11 9:9,14 10:4,9,16,21 11:5 12:22 13:12,20 14:16 16:13 21:6,11 23:9,23 28:4</p> <p>Inspection/maintenance 23:15</p> <p>inspections 13:2</p> <p>installed 21:12</p> <p>interfere 15:12 17:14 19:24</p> <p>introduced 12:17,20</p> <p>introductory 4:4</p> <p>issue 6:18</p> <p>issued 7:24</p> <hr/> <p style="text-align: center;">J</p> <hr/> <p>James 8:22 9:2</p> <p>January 13:1</p> <p>joined 4:2</p> <p>joining 28:2</p> <p>Journal 24:16,19 27:6,9</p> <p>June 12:16</p> <hr/> <p style="text-align: center;">K</p> <hr/> <p>Kent 3:12 9:10,15 10:23 11:6 12:8</p>
--	---	--

<p>13:17,24 15:7 16:4 18:2,19,24 19:7, 10,20 21:7 22:8 23:9</p>	<p>matter 4:7 5:3,8,9,19,21,23 6:3,20 7:5,24 8:12,14,17 28:24</p>	<p>25:14,22 26:2 27:2,8,11,14</p>
<p>Kings 28:11</p>	<p>means 22:13</p>	<p>noticed 4:16 7:14</p>
<hr/> <p style="text-align: center;">L</p> <hr/>	<p>mechanism 8:16</p>	<p>notices 7:23</p>
<p>language 9:24 14:13 22:22</p>	<p>mechanisms 8:7</p>	<p>notification 14:6</p>
<p>Lastly 8:13</p>	<p>media 8:2</p>	<p>notified 11:2</p>
<p>law 5:11 12:18</p>	<p>medium-duty 21:17</p>	<p>NOX 15:5,9 17:12 18:3</p>
<p>leadership 16:16</p>	<p>meet 13:24 21:4,5</p>	<p>number 3:2 9:11 13:2 23:10</p>
<p>left 13:15</p>	<p>Meeting 26:4</p>	<hr/> <p style="text-align: center;">O</p> <hr/>
<p>legal 4:16 7:14 24:11,18 25:14,22 27:2,8,14</p>	<p>Meetings 27:12</p>	<p>objective 9:12</p>
<p>legislation 13:2,15 16:8 21:1</p>	<p>Memo 24:7</p>	<p>occurs 21:22</p>
<p>legislative 15:16</p>	<p>messaging 8:4</p>	<p>October 7:16 8:9 28:14,22</p>
<p>light 7:10</p>	<p>Metropolitan 10:19</p>	<p>offer 6:1 7:7</p>
<p>light-duty 11:15 21:17</p>	<p>migration 22:9</p>	<p>offered 4:15</p>
<p>limited 5:19</p>	<p>minimum 6:4 7:12,13</p>	<p>Office 24:8 28:11</p>
<p>link 7:19</p>	<p>model 9:20 11:22,24 15:2 17:6 18:10,11 21:2,14</p>	<p>Officer 28:10</p>
<p>list 3:23</p>	<p>model-year 9:16</p>	<p>Officer's 6:16</p>
<p>listed 5:12</p>	<p>modeled 16:9 17:4,18 18:5,14 19:1, 12</p>	<p>officers 3:15</p>
<p>locations 3:21</p>	<p>modeling 14:15,17 17:9,24</p>	<p>official 6:8</p>
<p>long 8:7</p>	<p>modifying 13:20</p>	<p>offset 15:19 16:23</p>
<p>Low 3:10 9:9,13 10:16 23:8</p>	<p>motor 11:11 13:10 14:12,15 15:20 16:2,8,10 17:3 20:4 22:1 23:23 28:3</p>	<p>older 9:21 11:17 16:4 21:9</p>
<hr/> <p style="text-align: center;">M</p> <hr/>	<hr/> <p style="text-align: center;">N</p> <hr/>	<p>onboard 11:23 16:21 17:19 18:6,14 19:1,13 21:16,21 22:6,8</p>
<p>made 7:2,3 8:14</p>	<p>National 11:4 15:13 17:16 20:1</p>	<p>one-hour 10:15</p>
<p>mail 28:10</p>	<p>Natural 3:7 9:5</p>	<p>online 4:17 5:11 7:14 28:7</p>
<p>maintain 10:1 20:11</p>	<p>newer 12:7 21:15</p>	<p>open 4:9 6:3 7:16 28:13,22</p>
<p>maintenance 3:11 9:9,14 10:4,10, 16,22 11:5 13:13,20 14:17 15:12 16:13 17:15 20:1,7 21:6 23:9</p>	<p>newest 11:22,23</p>	<p>opportunity 4:15</p>
<p>make 11:3 21:11</p>	<p>Newman 3:1,13 28:10,16</p>	<p>options 15:21</p>
<p>making 8:11</p>	<p>news 24:13,16,19 25:11,15 26:5,24 27:3,6,9</p>	<p>order 5:24 6:19 16:6,11</p>
<p>malfunctioning 12:2</p>	<p>nitrogen 15:5</p>	<p>organic 15:6</p>
<p>Manager 9:3</p>	<p>non-attainment 10:14</p>	<p>overcome 18:23 19:10</p>
<p>mandate 15:16</p>	<p>non-substantive 23:1 27:22</p>	<p>owner 23:20</p>
<p>mandated 10:10</p>	<p>note 4:14 7:1</p>	<p>owners 11:1 12:5 13:4 20:9,15,18</p>
<p>mark 28:18</p>	<p>noted 8:7</p>	<p>oxides 15:5</p>
	<p>noticed 8:7</p>	<p>ozone 10:15</p>
	<p>notice 14:3,4 20:20 24:4,9,12,18,21</p>	<hr/> <p style="text-align: center;">P</p> <hr/>
		<p>p.m. 4:19 14:21 25:12,16,20,24</p>

26:11,17,21	proceeding 3:16,24 6:7	reduced 13:2
part 11:12 16:23	proceedings 6:5	Reducing 20:10
participating 3:20	process 6:19 11:13 13:9	reduction 13:22 16:21 18:22 19:9
passage 15:3	program 3:11 9:3,10,14,18 10:10,17, 22 11:6 13:13,21 14:17 15:3,21 16:13,22 17:7 21:7 23:9,15 28:4	reductions 18:1 19:18
people 20:20	programs 15:7	regard 6:11 7:4
performance 21:4	proper 20:7	Region 16:19,20
performed 11:14,18	proposed 3:9 5:9 6:12 7:4 14:23 20:6,14 21:1,8,13 22:6 23:7 25:1	register 4:19 15:1 24:21,23 25:3 27:19
period 7:12,15 23:17	Protection 16:19 22:18	registered 12:7 22:10
permitted 6:24	protocols 5:16 6:23	registrants 4:20
pertinent 5:20	provide 3:5 4:5,18 7:12 8:24 21:19	registration 4:12 10:7 11:12 13:6,7 23:17,19,24
Philadelphia 10:18	public 3:9 5:17 7:15,23 8:18 9:6,7 14:9,10,20 23:6 24:13,17,20 25:6,9, 13,17,20,24 26:2,3,11,14,17,21 27:12,16 28:2,13	Regulation 14:4 22:21
physical 7:22	published 14:23 24:22 25:2 26:6 27:18	regulations 10:2,3 15:11 24:23 25:3 27:19
physically 3:22	pump 20:21	regulatory 5:9 7:5 8:17 14:13 27:17
place 5:16	purchased 13:1	related 20:22
plate 23:19	purpose 6:10 9:6	release 26:6
platform 3:6	pursuant 4:23	remain 5:16 6:3 28:13,22
platforms 8:2		remaining 22:12,14
pollution 15:15	<hr/> Q <hr/>	remarks 4:4
population 10:20	qualify 12:10	remember 8:5
portion 4:9	quality 8:23 9:4 10:23 11:4,7 13:14, 19 14:1,11,14 15:13 17:16 20:2,11,23 22:20	remove 9:23
Postal 7:21	Quality's 15:17	removed 22:3,4
posted 5:2 27:15	<hr/> R <hr/>	renew 13:5
pounds 9:19 11:16 17:20,22 18:7,8, 16 19:3,14,16 21:19	read 28:17	renewal 11:13 23:19,20
pre 18:16 19:3	realized 15:22	repaired 11:1,9 12:3
prepare 4:22	reasons 6:21	repairs 11:3 12:6,9
prepared 5:1 14:8	receive 4:11 9:7 11:22	replaced 22:3
present 3:24 4:22 16:14	received 5:4,18 8:6,8	Report 6:16
presentation 4:6,11 5:14 8:24 25:6 26:10 27:24 28:15	receiving 15:23	reporter 4:21
presented 14:18,19	recommendations 16:14	reporter's 6:8
pressure 11:21 22:4	record 4:1,6 5:22 6:3,6,11,13 7:8 23:6 28:13,21	request 16:9 20:4
previously 7:6		requested 14:10,22 16:3 22:2
price 12:12		required 7:11 11:8,10,19,21 12:3 13:18
prior 8:11 23:20		requirement 4:24 10:10
problem 21:22		requirements 9:21 17:19 18:6 19:13 20:16 21:9 23:15 26:8
problems 13:14 20:22		
Procedures 7:11		

<p>requiring 11:1</p> <p>Resources 3:7 9:5</p> <p>respective 3:21</p> <p>respiratory 20:22</p> <p>response 26:20</p> <p>result 13:15</p> <p>resulted 13:11 18:18 19:6</p> <p>resulting 15:16</p> <p>review 6:19</p> <p>reviewed 6:17</p> <p>revision 15:14 19:22,24 20:3</p> <p>revisions 3:10 15:11</p> <p>room 3:19</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>sale 22:22</p> <p>scenarios 14:15 15:18 16:10</p> <p>Secretary 3:14 6:17,18 8:11,15,20 14:5 24:5,8 28:11</p> <p>Secretary's 6:2</p> <p>Section 5:11 10:6,7,8 22:16 23:16</p> <p>selected 19:21</p> <p>senior 16:16</p> <p>September 3:4 12:18 14:24 24:24 25:4 26:4 27:20</p> <p>serve 3:14</p> <p>service 7:21 12:20</p> <p>session 6:24</p> <p>seven-model-year 17:22 18:9 19:17</p> <p>severe 10:12,15</p> <p>sheet 25:9 26:17</p> <p>sheets 26:14</p> <p>shortfall 21:6</p> <p>shown 23:5</p> <p>shows 22:10</p> <p>sign-in 25:8 26:13,16</p> <p>signed 12:18</p>	<p>Similar 19:5</p> <p>simulator 14:16 16:11</p> <p>single-speed 17:21 19:15</p> <p>slide 14:18</p> <p>slides 23:5</p> <p>social 8:2</p> <p>solely 5:19</p> <p>solve 15:21</p> <p>spend 12:5,8</p> <p>spending 20:20</p> <p>staff 4:5 15:18 16:19,20</p> <p>standard 6:22 10:15 17:17 20:2,19 21:4</p> <p>standards 11:4,7 15:14 20:17</p> <p>Start 14:2,4 24:4,9</p> <p>state 3:6 10:2 22:12 24:1,12 25:11,15 26:3,24 27:3,12</p> <p>stated 7:6,15</p> <p>Statement 27:18</p> <p>States 10:5 22:17</p> <p>statewide 13:19 16:12</p> <p>statistical 10:19</p> <p>statutory 4:24 6:10</p> <p>streamline 13:9</p> <p>subject 5:19,21</p> <p>submitted 7:18 8:2,20 28:6</p> <p>Subpart 10:4 23:14</p> <p>substantial 18:18</p> <p>sufficient 18:23 19:9,19</p> <p>suggested 14:13</p> <p>summary 26:20</p> <p>support 14:16 23:6,13</p> <p>survey 26:19</p> <p>Sussex 13:16,23 15:8 16:22 17:24 18:10,11,22 19:9,18 22:7</p> <p>systems 12:2 21:24</p>	<hr/> <p style="text-align: center;">T</p> <hr/> <p>table 23:3 27:21</p> <p>tampering 20:8 22:19</p> <p>tank 11:20 22:4</p> <p>Technical 23:12</p> <p>test 9:23 11:17,19,20,21,23 15:24 16:3 17:19,21 18:6,8,13,15 19:2,13, 15 20:5 21:17 22:2,4,6,8</p> <p>tested 11:10</p> <p>testing 9:21 10:17 11:14 13:9 16:22 17:18 18:5,16 19:3,12 21:9 26:7</p> <p>tests 9:22 21:21 22:3</p> <p>text 8:3</p> <p>therefor 6:21</p> <p>Theresa 3:13 28:10</p> <p>threshold 12:10,11</p> <p>Thursday 3:3</p> <p>time 4:20 15:14 20:3</p> <p>today 4:19</p> <p>today's 27:1,4,7,10,11,15,24</p> <p>tonight 3:22 5:15 6:7,14 7:4 8:15</p> <p>tonight's 3:15 5:6,13,20 6:4,10</p> <p>tons 15:5,6 17:12</p> <p>transcript 4:23 5:2 6:9,14</p> <p>Transportation's 16:16</p> <p>travel 22:11</p> <p>turning 4:4</p> <p>Twitter 8:3</p> <p>two-speed 9:23 11:20 16:3 18:7,12 20:5 22:2</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>U.S. 7:21 28:9</p> <p>ultimate 8:13</p> <p>ultimately 6:18</p> <p>United 10:5 22:17</p> <p>update 26:7</p>
---	--	--

USPS 8:6

V

vehicle 9:19,21 10:9,21 11:12 12:5
13:10 14:12,15 15:23 16:8,10,11,24
20:7,8,9,10,15,17,18 21:9,11,14,23
22:9,10 23:23,24 26:7 28:4

Vehicle's 20:4

vehicles 9:17,18 10:7,24 11:2,8,10,
16,17,18,21 12:1,4,7,23,24 13:3,4,11
15:3,20,23 16:2,4 17:3,20,21 18:7,8,
15,17 19:2,4,14,16 20:19 21:3,16,18
22:1

verbal 4:9,12,15,18

verbatim 4:22 6:8

vet 8:17

violations 22:19

virtual 3:6,9 5:21 26:11,14,17,21
28:24

virtually 3:18,23 4:21

visit 5:7

visits 20:21

VOCS 15:6,10 17:12 18:3,19 19:6

volatile 15:6

W

waiver 12:4,10

waivers 12:10

ways 8:19

Webex 3:22

webpage 5:3,7,10,12 7:19,23

website 27:15

weighing 9:18 11:16 21:18

weight 8:9 9:20 21:15

Wilmington 10:19

wished 4:17

wishes 6:1 7:6

worked 14:11 15:20

workshop 14:10 24:14,17,20 25:7,9
26:15,18

workshops 14:20 25:13,17,21 26:1,
3,11,21

writing 28:7

written 6:15 8:1

Y

year 9:20 21:2,14

years 9:17 11:11,22,24 12:23 13:6,11
15:2 21:3

Youtube 8:3