

1 Particulate Emissions from Industrial Process  
2 Operations

3 (7 DE Admin Code 1105)

4  
5 Docket No. 2023-R-A-0025  
6

7  
8 Moderated by Theresa Smith

9 Tuesday, August 27, 2024

10 6:19 p.m.  
11

12  
13 Remote Proceeding

14 DNREC Division of Air Quality

15 100 West Water Street, Suite 6A

16 Dover, DE 19904  
17  
18  
19  
20  
21

22 Reported by: Andrew Weader

23 JOB NO: 6827107  
24

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

A P P E A R A N C E S

List of Attendees:

Kelsey Pangman, DNREC Division of Air Quality

(by videoconference)

Renar Held, DNREC Division of Air Quality Supervisor

(by videoconference)

Yagna Shah, DNREC (by videoconference)

Tina Merrill, DNREC AQ Planner (by videoconference)

## E X H I B I T S

1	NO.	DESCRIPTION	PAGE
2	Department :		
3	Exhibit 1	Regulation 1105 Technical Support Document	17
4	Exhibit 2	Startup, Shutdown, and Malfunction SIP Call . EPA Final Rule	17
5	Exhibit 3	Startup, Shutdown, and Malfunction SIP Call Submittal Disapproval	17
6	Exhibit 4	Start Action Notice approved by the Department Secretary January 11, 2024	17
7	Exhibit 5	Register Notice and Proposed Amendments to 7 DE Admin Code 1105, published in Delaware Register of Regulations on August 1, 2024	17
8	Exhibit 6	Affidavit and Legal Notice in the July 25, 2024, News Journal	17
9	Exhibit 7	Affidavit and Legal Notice in the July 25, 2024, Delaware State News	17
10	Exhibit 8	State Public Meeting Calendar hearing notice dated July 23, 2024	17

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

E X H I B I T S (Cont'd)

NO.	DESCRIPTION	PAGE
Department (Cont'd):		
Exhibit 9	Public Hearing Web Page on the DNREC Website	17
Exhibit 10	Regulatory Flexibility Analysis and Impact Statement Form, published in Delaware Register of Regulations, August 1, 2024	17
Exhibit 11	DNREC Presentation	17

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

P R O C E E D I N G S

THE HEARING OFFICER: All right. Good evening again. The time is now 6:19 p.m. on Tuesday, August 27, 2024. My name is Theresa Smith, and Secretary Garvin has appointed me to serve as the hearing officer for tonight's formal proceeding.

For ADA compliance, tonight's formal proceeding offers closed captioning and variation of languages. To use the closed captioning feature from your computer, click on the "Show Captions" button located at the bottom of your screen. If you don't see the Show Captions button, you may need to select the three dots that say "More."

Once you find your Show Captions button, you should click the carrot pointing up, which will bring up your translation options. You can select your preferred language from there. If your preferred language is not listed, you can select More, and all of the languages will be listed.

If you are using a smartphone, select the captions button at the bottom of your screen indicated by CC. Again, if your preferred language is not listed at the bottom, you may have to select the three dots that say More. You should then select

1 "Meeting Settings" with the gear icon next to it.

2           Once the settings page comes up,  
3 located at the very bottom, select "Translation  
4 Language." From there, you'll be able to select your  
5 preferred language and then select "Done" at the right  
6 upper corner, and then Done again. If the captions  
7 are not automatically popping up, you may need to  
8 select "Captions" again and select "Show Captions."

9           So again, I would like to thank you all  
10 for taking your time out of your schedules to continue  
11 to join us. This virtual platform allows the state of  
12 Delaware's Natural Resources and Environmental Control  
13 to conduct its virtual public hearing on the proposed  
14 revisions to Docket Number 2023-R-A-0025 (7 E Admin  
15 Code 1105) Particulate Admissions from Industrial  
16 Process Operations.

17           This is the second of four hearings we  
18 have scheduled tonight, so again, please bear with me  
19 as each hearing will reflect its own record. And for  
20 a thorough and consistent record, you will hear me  
21 repeat what I just said, and you'll hear it again in  
22 the next two hearings.

23           The purpose of this hearing is to build  
24 a record in regard to the hearing matter by providing

1 a formal legal platform for the public to learn about  
2 the proposed revisions and to enable the public to  
3 offer live comment.

4 This hearing is being conducted  
5 virtually. No one is together at this at the same  
6 location. Everyone is participating independently at  
7 their own respective locations. While we are not  
8 physically gathered tonight, Zoom does generate a list  
9 of those who are virtually present for this  
10 proceeding, so the department will have a record of  
11 those who have electronically joined.

12 There is a court reporter virtually  
13 present who will prepare a verbatim transcript of this  
14 hearing pursuant to the statutory requirement for  
15 DNREC to have the same prepared, and as always, that  
16 transcript will be posted on the hearing webpage  
17 dedicated to this matter as soon as it is received.

18 In addition, I would encourage those  
19 who are attending the hearing to also visit the  
20 hearing webpage dedicated to this matter for  
21 additional details concerning the proposed revisions  
22 to 7 D Admin Code 1105. The hearing record presented  
23 tonight, along with other related documents, are  
24 posted on the department's hearing webpage dedicated

1 to this matter. The hearing webpage can be found  
2 online under the administrative law section of DNREC's  
3 webpage, that will be listed towards the end of the  
4 hearing.

5 At the conclusion of my introductory  
6 remarks, I'll be turning the hearing over to the  
7 department staff to provide their presentation for the  
8 record being generated in this matter. Whereas the  
9 department would then open the verbal comment portion  
10 of the hearing following the department's  
11 presentation, the department did not receive  
12 registration for verbal comment for tonight's hearing.

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

19 Before we begin the presentation,  
20 please be advised of the following protocols that  
21 remain in place for all DNREC public hearings. All  
22 comments received must be limited solely to the  
23 subject matter of tonight's hearing. All comments  
24 pertinent to the subject matter of this virtual



1 hearing will be incorporated into the record being  
2 generated in this matter.

3 In light of the Administrative  
4 Procedures Act, and to ensure that everyone who wishes  
5 to offer comment for the secretary's consideration is  
6 accommodated, the department is required to, at a  
7 minimum, provide a comment period of 15 days after the  
8 hearing.

9 There's only one authentic record of  
10 this formal proceeding tonight, and it is the official  
11 court reporter's verbatim transcript.

12 The statutory purpose of tonight's  
13 hearing is to build a record with regard to the  
14 department's proposed actions. A record consisting of  
15 the transcript of the hearing tonight, all comments,  
16 all exhibits, and eventually, the hearing officer's  
17 report will be reviewed by Secretary Garvin. The  
18 secretary will ultimately issue an order following  
19 that review process containing his decision on this  
20 matter and the reasons therefore.

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

24 It is important to note that no

1 decision has already been made tonight by the  
2 department, nor will any decision be made tonight with  
3 regard to the proposed regulatory matter.

4 As previously stated, DNREC wishes to  
5 ensure that everyone is enabled to offer their  
6 comments for inclusion into the record being generated  
7 in this matter. As noticed in legal ads and online,  
8 the department stated that the public comment period  
9 will be open through September 11, 2024.

10 Comments may be submitted through a  
11 comment form link on the hearing webpage via email to  
12 dnrechearingcomments@delaware.gov or via the U.S.  
13 Postal Services at the physical address for DNREC  
14 indicated on the hearing webpage and on the public  
15 notices previously issued in this matter.

16 Written comments to DNREC may not be  
17 submitted using social media platforms such as  
18 Twitter, Facebook, YouTube, or text messaging. Videos  
19 of either commenters or third-party speakers will not  
20 be accepted as a file attachment to written comments  
21 or as hyperlinks within the written comments or  
22 embedded in email submissions.

23 Please remember all comments received  
24 either through U.S.P.S. or via the electronic

1 mechanism noted just now, as long as received by the  
2 department on or before September 11th, will bear the  
3 exact same weight and will be considered equally by  
4 the secretary prior to making his final decision in  
5 this matter.

6           While all comments are appreciated,  
7 each comment must be limited solely to the subject  
8 matter of tonight's hearing. Multiple comments saying  
9 the same thing do not outweigh one singular comment.  
10 Simply put, comments are not votes. A single  
11 well-supported comment may carry more weight than a  
12 thousand form letters.

13           I also want to note that only comments  
14 submitted to DNREC and entered by myself in the  
15 hearing record in this matter will be posted on the  
16 hearing webpage and be considered by the department as  
17 a part of the decision process. The department has  
18 not partnered with any outside organization or  
19 websites to assist with the public submission of  
20 comments in this matter, so again, only submit  
21 comments to DNREC directly.

22           Lastly, the ultimate decision regarding  
23 this matter is made by DNREC's Secretary Garvin. This  
24 formal proceeding tonight acts as a mechanism to

1 enable the department to thoroughly vet the hearing  
2 matter to the public and to let the public know the  
3 various ways to which submit comment for  
4 Secretary Garvin's consideration, if so desired.

5 I will now hand it over to  
6 Kelsey Pangman with the Division of Air Quality to  
7 provide the department's presentation.

8 MS. PANGMAN: Good evening. My name is  
9 Kelsey Pangman, and I am an environmental scientist  
10 with the Airshed Planning and Inventory Program for  
11 the Division of Air Quality in the Delaware Department  
12 of Natural Resources and Environmental Control.

13 The purpose of this hearing is to  
14 receive public comments on the proposed updates to  
15 Title 7 of the Delaware Administrative Code Regulation  
16 1105, Particulate Emissions from Industrial Process  
17 Operations.

18 Regulation 1105 sets air emission  
19 limits for particulate matter to protect public health  
20 and the environment. Regulation 1105 is part of  
21 Delaware's State Implementation Plan. A State  
22 Implementation Plan is a federally enforceable plan  
23 that is developed by states to explain how they will  
24 comply with the Clean Air Act to improve air quality.

1           When regulations that are part of the  
2 State Implementation Plan are amended, states are  
3 required to submit the proposed amendments to the  
4 Environmental Protection Agency for approval. If the  
5 amendments are approved by the Environmental  
6 Protection Agency, they become part of the State  
7 Implementation Plan and become federally enforceable.

8           On June 30, 2011, the Sierra Club filed  
9 a petition with the Environmental Protection Agency  
10 administrator concerning the treatment of excess  
11 emissions during periods of startup, shutdown, and  
12 malfunction; specifically, how those emissions are  
13 treated in State Implementation Plan provisions that  
14 the Environmental Agency approved in the past.

15           A startup is the setting and operation  
16 of a process or a piece of equipment, and a shutdown  
17 is the stopping of a process or a piece of equipment.  
18 A malfunction is a sudden and unavoidable breakdown of  
19 process or control equipment. During periods of  
20 startup, shutdown, and malfunction, equipment is not  
21 running at peak efficiency resulting in excess  
22 emissions during these times. Air pollution emitted  
23 during these periods may adversely impact the health  
24 of people nearby and contribute to smog and other

1 problems in communities that are further downwind.

2 On June 12, 2015, the Environmental  
3 Protection Agency took final action on the Sierra Club  
4 petition. This final rule is commonly known as the  
5 2015 State Implementation Plan Call. In the 2015  
6 State Implementation Plan Call the Environmental  
7 Protection Agency clarified its startup, shutdown,  
8 malfunction policy interpretation that State  
9 Implementation Plan provisions cannot include  
10 exemptions for excess emissions during startup,  
11 shutdown, malfunction events.

12 The Environmental Protection Agency  
13 directed Delaware to correct specific startup,  
14 shutdown, and malfunction provisions in their State  
15 Implementation Plan, giving a submissions deadline of  
16 November 22, 2016. Title 7 Delaware Administrative  
17 Code 1105 was one of the Delaware regulations included  
18 in the State Implementation Plan Call.

19 On November 22, 2016, Delaware  
20 submitted a response to the June 2015 State  
21 Implementation Plan Call. The State Implementation  
22 Plan submittal included a revised version of  
23 Regulation 1105. The revision removes the offending  
24 exemption from the State Implementation Plan, as shown

1 by the strikeout, and created a new 30-day rolling  
2 average emission limit and a new subsection 2.2 that  
3 would apply at all times as indicated by the  
4 underlying text.

5 It should be noted that Delaware did  
6 not agree with the Environmental Protection Agency's  
7 position that the startup, shutdown, and malfunction  
8 components of Delaware's State Implementation Plan  
9 were deficient in relation to the 2015 State  
10 Implementation Plan Call.

11 Delaware believes that the startup,  
12 shutdown, malfunction components of its State  
13 Implementation Plan were protective of the national  
14 ambient air quality standards for particulate matter  
15 and not deficient. Therefore, Delaware adopted a  
16 state-only version of Regulation 1105, which resulted  
17 in the same 0.2 grains per standard cubic foot but  
18 allowed a 0.2 grains per cubic standard foot 30-day  
19 rolling average for startup, shutdown, and malfunction  
20 events.

21 On October 23, 2023, the Environmental  
22 Protection Agency issued a final rule disapproving  
23 Delaware's November 22, 2016, State Implementation  
24 Call submittal for Regulation 1105. Therefore,

1 Delaware is proposing to amend Regulation 1105 in  
2 response to the Environmental Protection Agency's  
3 disapproval to comply with the 2015 State  
4 Implementation Plan Call.

5 The objective of the proposed  
6 amendments to Regulation 1105 is to update the  
7 exemptions for excess emissions. The amendments  
8 address Section 1.0, General Provisions and Section  
9 3.0 Emission Limits.

10 The intent of the proposed amendments  
11 is to remove the 0.2 grains per standard cubic foot on  
12 a 30-day rolling average, emission limit for startup,  
13 shutdown, malfunction events in Delaware state-only  
14 regulation, and make the 0.2 grains per standard cubic  
15 foot emissions limit apply at all times as shown in  
16 the proposed regulation language.

17 Now, we would like to enter 11 exhibits  
18 shown on the next two slides into the public record to  
19 support the proposed amendments to Title 7 of the  
20 Delaware Administrative Code Regulation 1105  
21 Particulate Emissions from Industrial Process  
22 Operations.

23 This completes the department's  
24 presentation of proposed amendments to Regulation



1 1105. Thank you.

2 THE HEARING OFFICER: Thank you,  
3 Ms. Pangman. Has there been any changes to the  
4 exhibits since they were posted to the hearing webpage  
5 as proposed?

6 MS. PANGMAN: No changes.

7 THE HEARING OFFICER: Thank you.

8 I have received the electronic versions  
9 of the proposed exhibits by the department, and I  
10 hereby mark these exhibits as Department's Exhibits 1  
11 through 11.

12 (Department Exhibits 1 through 11 were  
13 marked for identification.)

14 THE HEARING OFFICER: As the department  
15 received no registration for public comment by 12:00  
16 p.m. today, there will not be a verbal comment portion  
17 for this hearing tonight. Again, if you wish to  
18 submit public comments in writing, please follow the  
19 instructions that were given during my introductory  
20 remarks and are also available on the screen for those  
21 who are virtually present.

22 The hearing record will remain open  
23 through September 11, 2024. As previously mentioned,  
24 the court reporter's transcript will be posted on the

1 hearing webpage dedicated to this matter as soon as it  
2 is received.

3 This hearing is now concluded at 6:36  
4 p.m.

5 THE REPORTER: We're off the record at  
6 6:36 p.m.

7 (Whereupon, at 6:36 p.m., the  
8 proceeding was concluded.)

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

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

CERTIFICATE

I, ANDREW WEADER, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

*Andrew Weader*

ANDREW WEADER  
Notary Public in and for the  
Commonwealth of Pennsylvania

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

CERTIFICATE OF TRANSCRIBER

I, SIOBHAN MACKEY, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



SIOBHAN MACKEY

<b>0</b>	<b>2016</b> 14:16,19 15:23	16:19	<b>adopted</b> 15:15
<b>0.2</b> 15:17,18 16:11,14	<b>2023</b> 1:5 6:14 15:21	<b>8</b>	<b>ads</b> 8:15 10:7
<b>0025</b> 1:5 6:14	<b>2024</b> 1:9 3:13 3:17,19,21,24 4:9 5:4 10:9 17:23	<b>8</b> 3:22	<b>adversely</b> 13:23
<b>1</b>	<b>22</b> 14:16,19 15:23	<b>9</b>	<b>advised</b> 8:20
<b>1</b> 3:4,17 4:9 17:10,12	<b>23</b> 3:24 15:21	<b>9</b> 4:4	<b>affidavit</b> 3:18 3:20
<b>1.0</b> 16:8	<b>25</b> 3:19,21	<b>a</b>	<b>agency</b> 13:4,6,9 13:14 14:3,7 14:12 15:22
<b>10</b> 4:6	<b>25386</b> 19:17	<b>ability</b> 19:10 20:7	<b>agency's</b> 15:6 16:2
<b>100</b> 1:15	<b>27</b> 1:9 5:4	<b>able</b> 6:4	<b>agree</b> 15:6
<b>11</b> 3:13 4:10 10:9 16:17 17:11,12,23	<b>27935</b> 20:13	<b>accepted</b> 10:20	<b>air</b> 1:14 2:3,5 12:6,11,18,24 12:24 13:22 15:14
<b>1105</b> 1:3 3:4,15 6:15 7:22 12:16,18,20 14:17,23 15:16 15:24 16:1,6 16:20 17:1	<b>3</b>	<b>accommodated</b> 9:6	<b>agency's</b> 15:6 16:2
<b>11th</b> 11:2	<b>3</b> 3:8	<b>accurate</b> 19:9 20:5	<b>agree</b> 15:6
<b>12</b> 14:2	<b>3.0</b> 16:9	<b>act</b> 9:4 12:24	<b>air</b> 1:14 2:3,5 12:6,11,18,24 12:24 13:22 15:14
<b>15</b> 9:7	<b>30</b> 13:8 15:1,18 16:12	<b>action</b> 3:11 14:3 19:12,16 20:8,12	<b>airshed</b> 12:10
<b>17</b> 3:5,7,10,13 3:17,19,21,24 4:5,9,10	<b>4</b>	<b>actions</b> 9:14	<b>allowed</b> 15:18
<b>19904</b> 1:16	<b>4</b> 3:11	<b>acts</b> 11:24	<b>allows</b> 6:11
<b>2</b>	<b>5</b>	<b>ada</b> 5:7	<b>ambient</b> 15:14
<b>2</b> 3:6	<b>5</b> 3:14	<b>addition</b> 7:18	<b>amend</b> 16:1
<b>2.2</b> 15:2	<b>6</b>	<b>additional</b> 7:21	<b>amended</b> 13:2
<b>2011</b> 13:8	<b>6</b> 3:18	<b>address</b> 10:13 16:8	<b>amendments</b> 3:15 13:3,5 16:6,7,10,19,24
<b>2015</b> 14:2,5,5 14:20 15:9 16:3	<b>6827107</b> 1:23	<b>admin</b> 1:3 3:15 6:14 7:22	<b>analysis</b> 4:6
	<b>6:19</b> 1:10 5:3	<b>administrative</b> 8:2 9:3 12:15 14:16 16:20	<b>andrew</b> 1:22 19:2,18
	<b>6a</b> 1:15	<b>administrator</b> 13:10	<b>apply</b> 15:3 16:15
	<b>7</b>	<b>admissions</b> 6:15	<b>appointed</b> 5:5
	<b>7</b> 1:3 3:15,20 6:14 7:22 12:15 14:16		<b>appreciated</b> 11:6

<p><b>approval</b> 13:4  <b>approved</b> 3:11  13:5,14  <b>aq</b> 2:8  <b>assist</b> 11:19  <b>attachment</b>  10:20  <b>attendees</b> 2:2  <b>attending</b> 7:19  <b>attorney</b> 19:14  20:10  <b>audio</b> 19:8 20:3  <b>august</b> 1:9 3:17  4:9 5:4  <b>authentic</b> 9:9  <b>automatically</b>  6:7  <b>available</b> 17:20  <b>average</b> 15:2  15:19 16:12</p>	<p style="text-align: center;"><b>c</b></p> <p><b>c</b> 2:1 5:1  <b>calendar</b> 3:22  <b>call</b> 3:7,9 14:5,6  14:18,21 15:10  15:24 16:4  <b>captioning</b> 5:8  5:9  <b>captions</b> 5:10  5:12,14,21 6:6  6:8,8  <b>carrot</b> 5:15  <b>carry</b> 11:11  <b>cc</b> 5:22  <b>certificate</b> 19:1  20:1  <b>certify</b> 19:4  20:2  <b>changes</b> 17:3,6  <b>chat</b> 9:22  <b>clarified</b> 14:7  <b>clean</b> 12:24  <b>click</b> 5:10,15  <b>closed</b> 5:8,9  <b>club</b> 13:8 14:3  <b>code</b> 1:3 3:15  6:15 7:22  12:15 14:17  16:20  <b>comes</b> 6:2  <b>comment</b> 7:3  8:9,12,15,17  9:5,7 10:8,11  11:7,9,11 12:3  17:15,16</p>	<p><b>commenters</b>  10:19  <b>comments</b> 8:22  8:23 9:15 10:6  10:10,16,20,21  10:23 11:6,8  11:10,13,20,21  12:14 17:18  <b>commonly</b> 14:4  <b>commonwealth</b>  19:20  <b>communities</b>  14:1  <b>completes</b>  16:23  <b>compliance</b> 5:7  <b>comply</b> 12:24  16:3  <b>components</b>  15:8,12  <b>computer</b> 5:10  <b>concerning</b>  7:21 13:10  <b>concluded</b> 18:3  18:8  <b>conclusion</b> 8:5  <b>conduct</b> 6:13  <b>conducted</b> 7:4  <b>consideration</b>  9:5 12:4  <b>considered</b>  11:3,16  <b>consistent</b> 6:20  <b>consisting</b> 9:14</p>	<p><b>cont'd</b> 4:1,3  <b>containing</b> 9:19  <b>continue</b> 6:10  <b>contribute</b>  13:24  <b>control</b> 6:12  12:12 13:19  <b>corner</b> 6:6  <b>correct</b> 14:13  <b>counsel</b> 19:11  19:14 20:7,10  <b>court</b> 7:12 9:11  17:24  <b>created</b> 15:1  <b>cubic</b> 15:17,18  16:11,14</p> <p style="text-align: center;"><b>d</b></p> <p><b>d</b> 5:1 7:22  <b>dated</b> 3:23  <b>day</b> 15:1,18  16:12  <b>days</b> 9:7  <b>de</b> 1:3,16 3:15  <b>deadline</b> 14:15  <b>decision</b> 9:19  10:1,2 11:4,17  11:22  <b>dedicated</b> 7:17  7:20,24 18:1  <b>deficient</b> 15:9  15:15  <b>delaware</b> 3:16  3:21 4:8 12:11  12:15 14:13,16  14:17,19 15:5</p>
<p style="text-align: center;"><b>b</b></p> <p><b>b</b> 3:1 4:1  <b>bear</b> 6:18 11:2  <b>believes</b> 15:11  <b>best</b> 19:10 20:6  <b>bottom</b> 5:11,21  5:23 6:3  <b>breakdown</b>  13:18  <b>bring</b> 5:16  <b>build</b> 6:23 9:13  <b>button</b> 5:10,12  5:15,21</p>			

<p>15:11,15 16:1 16:13,20 <b>delaware's</b> 6:12 12:21 15:8,23 <b>delaware.gov</b> 10:12 <b>department</b> 3:3 3:12 4:3 7:10 8:7,9,11,14 9:6 10:2,8 11:2,16 11:17 12:1,11 17:9,12,14 <b>department's</b> 7:24 8:10 9:14 12:7 16:23 17:10 <b>description</b> 3:2 4:2 <b>desired</b> 12:4 <b>details</b> 7:21 <b>developed</b> 12:23 <b>digital</b> 19:8 20:3 <b>directed</b> 14:13 <b>directly</b> 11:21 <b>disapproval</b> 3:9 16:3 <b>disapproving</b> 15:22 <b>division</b> 1:14 2:3,5 12:6,11 <b>dnrec</b> 1:14 2:3 2:5,7,8 4:5,10</p>	<p>7:15 8:21 10:4 10:13,16 11:14 11:21 <b>dnrec's</b> 8:2 9:21 11:23 <b>dnrehearing...</b> 10:12 <b>docket</b> 1:5 6:14 <b>document</b> 3:5 <b>documents</b> 7:23 <b>dots</b> 5:13,24 <b>dover</b> 1:16 <b>downwind</b> 14:1 <b>duly</b> 19:5</p>	<p><b>emitted</b> 13:22 <b>employed</b> 19:11,14 20:8 20:11 <b>employee</b> 19:13 20:10 <b>enable</b> 7:2 12:1 <b>enabled</b> 10:5 <b>encourage</b> 7:18 <b>enforceable</b> 12:22 13:7 <b>ensure</b> 9:4 10:5 <b>enter</b> 16:17 <b>entered</b> 11:14 <b>environment</b> 12:20 <b>environmental</b> 6:12 12:9,12 13:4,5,9,14 14:2,6,12 15:6 15:21 16:2 <b>epa</b> 3:7,10 <b>equally</b> 11:3 <b>equipment</b> 13:16,17,19,20 <b>es</b> 19:4 <b>evening</b> 5:3 12:8 <b>events</b> 14:11 15:20 16:13 <b>eventually</b> 9:16 <b>exact</b> 11:3 <b>excess</b> 13:10,21 14:10 16:7</p>	<p><b>exemption</b> 14:24 <b>exemptions</b> 14:10 16:7 <b>exhibit</b> 3:4,6,8 3:11,14,18,20 3:22 4:4,6,10 <b>exhibits</b> 9:16 16:17 17:4,9 17:10,10,12 <b>explain</b> 12:23</p>
	<b>e</b>		<b>f</b>
	<p><b>e</b> 2:1,1 3:1 4:1 5:1,1 6:14 <b>efficiency</b> 13:21 <b>either</b> 10:19,24 <b>electronic</b> 10:24 17:8 <b>electronically</b> 7:11 <b>email</b> 10:11,22 <b>embedded</b> 10:22 <b>emission</b> 12:18 15:2 16:9,12 <b>emissions</b> 1:1 12:16 13:11,12 13:22 14:10 16:7,15,21</p>		<p><b>facebook</b> 10:18 <b>feature</b> 5:9 <b>federally</b> 12:22 13:7 <b>file</b> 10:20 <b>filed</b> 13:8 <b>final</b> 3:7,10 11:4 14:3,4 15:22 <b>financially</b> 19:15 20:11 <b>find</b> 5:14 <b>flexibility</b> 4:6 <b>follow</b> 17:18 <b>following</b> 8:10 8:20 9:18 <b>foot</b> 15:17,18 16:11,15 <b>foregoing</b> 19:3 19:4 20:4 <b>form</b> 4:7 10:11 11:12</p>

<b>formal</b> 5:6,7 7:1 9:10 11:24 <b>found</b> 8:1 <b>four</b> 6:17 <b>further</b> 14:1 19:13 20:9	9:8,13,15,16,21 9:23 10:11,14 11:8,15,16 12:1,13 17:2,4 17:7,14,17,22 18:1,3	<b>independently</b> 7:6 <b>indicated</b> 5:22 10:14 15:3 <b>industrial</b> 1:1 6:15 12:16 16:21 <b>instructions</b> 17:19 <b>intent</b> 16:10 <b>interested</b> 19:15 20:12 <b>interpretation</b> 14:8 <b>introductory</b> 8:5 17:19 <b>inventory</b> 12:10 <b>issue</b> 9:18 <b>issued</b> 10:15 15:22	<b>know</b> 12:2 <b>knowledge</b> 19:10 20:6 <b>known</b> 14:4
<b>g</b>	<b>hearings</b> 6:17 6:22 8:21 <b>held</b> 2:5 <b>hereto</b> 19:15 20:11 <b>hyperlinks</b> 10:21	<b>interpretation</b> 14:8 <b>introductory</b> 8:5 17:19 <b>inventory</b> 12:10 <b>issue</b> 9:18 <b>issued</b> 10:15 15:22	<b>l</b>
<b>g</b> 5:1 <b>garvin</b> 5:5 9:17 11:23 <b>garvin's</b> 12:4 <b>gathered</b> 7:8 <b>gear</b> 6:1 <b>general</b> 16:8 <b>generate</b> 7:8 <b>generated</b> 8:8 9:2 10:6 <b>given</b> 17:19 <b>giving</b> 14:15 <b>good</b> 5:2 12:8 <b>grains</b> 15:17,18 16:11,14	<b>i</b>	<b>icon</b> 6:1 <b>identification</b> 17:13 <b>impact</b> 4:7 13:23 <b>implementati...</b> 12:21,22 13:2 13:7,13 14:5,6 14:9,15,18,21 14:21,24 15:8 15:10,13,23 16:4 <b>important</b> 8:13 9:24 <b>improve</b> 12:24 <b>include</b> 14:9 <b>included</b> 14:17 14:22 <b>inclusion</b> 10:6 <b>incorporated</b> 9:1	<b>language</b> 5:17 5:18,22 6:4,5 16:16 <b>languages</b> 5:9 5:19 <b>lastly</b> 11:22 <b>law</b> 8:2 <b>learn</b> 7:1 <b>legal</b> 3:18,20 7:1 8:15 10:7 <b>letters</b> 11:12 <b>light</b> 9:3 <b>limit</b> 15:2 16:12 16:15 <b>limited</b> 8:22 11:7 <b>limits</b> 12:19 16:9 <b>link</b> 10:11 <b>list</b> 2:2 7:8 <b>listed</b> 5:18,19 5:23 8:3 <b>live</b> 7:3 <b>located</b> 5:11 6:3 <b>location</b> 7:6 <b>locations</b> 7:7 <b>long</b> 11:1
<b>h</b>	<b>h</b> 3:1 4:1 <b>hand</b> 12:5 <b>health</b> 12:19 13:23 <b>hear</b> 6:20,21 <b>hearing</b> 3:23 4:4 5:2,6 6:13 6:19,23,24 7:4 7:14,16,19,20 7:22,24 8:1,4,6 8:10,12,23 9:1	<b>j</b>	<b>january</b> 3:13 <b>job</b> 1:23 <b>join</b> 6:11 <b>joined</b> 7:11 <b>journal</b> 3:19 <b>july</b> 3:19,21,24 <b>june</b> 13:8 14:2 14:20
<b>h</b> 3:1 4:1 <b>hand</b> 12:5 <b>health</b> 12:19 13:23 <b>hear</b> 6:20,21 <b>hearing</b> 3:23 4:4 5:2,6 6:13 6:19,23,24 7:4 7:14,16,19,20 7:22,24 8:1,4,6 8:10,12,23 9:1	<b>icon</b> 6:1 <b>identification</b> 17:13 <b>impact</b> 4:7 13:23 <b>implementati...</b> 12:21,22 13:2 13:7,13 14:5,6 14:9,15,18,21 14:21,24 15:8 15:10,13,23 16:4 <b>important</b> 8:13 9:24 <b>improve</b> 12:24 <b>include</b> 14:9 <b>included</b> 14:17 14:22 <b>inclusion</b> 10:6 <b>incorporated</b> 9:1	<b>january</b> 3:13 <b>job</b> 1:23 <b>join</b> 6:11 <b>joined</b> 7:11 <b>journal</b> 3:19 <b>july</b> 3:19,21,24 <b>june</b> 13:8 14:2 14:20	<b>limits</b> 12:19 16:9 <b>link</b> 10:11 <b>list</b> 2:2 7:8 <b>listed</b> 5:18,19 5:23 8:3 <b>live</b> 7:3 <b>located</b> 5:11 6:3 <b>location</b> 7:6 <b>locations</b> 7:7 <b>long</b> 11:1
	<b>k</b>	<b>kelsey</b> 2:3 12:6 12:9	



m	n	officer 5:2,6 17:2,7,14 19:2	part 11:17 12:20 13:1,6
<p><b>mackey</b> 20:2,15  <b>made</b> 10:1,2  11:23  <b>make</b> 16:14  <b>making</b> 11:4  <b>malfunction</b>  3:6,8 13:12,18  13:20 14:8,11  14:14 15:7,12  15:19 16:13  <b>mark</b> 17:10  <b>marked</b> 17:13  <b>matter</b> 6:24  7:17,20 8:1,8  8:23,24 9:2,20  10:3,7,15 11:5  11:8,15,20,23  12:2,19 15:14  18:1  <b>mechanism</b>  11:1,24  <b>media</b> 10:17  <b>meeting</b> 3:22  6:1  <b>mentioned</b>  17:23  <b>merrill</b> 2:8  <b>messaging</b>  10:18  <b>minimum</b> 9:7  <b>moderated</b> 1:8  <b>multiple</b> 11:8</p>	<p><b>n</b> 2:1 5:1  <b>name</b> 5:4 12:8  <b>national</b> 15:13  <b>natural</b> 6:12  12:12  <b>nearby</b> 13:24  <b>need</b> 5:12 6:7  <b>needed</b> 8:17  <b>neither</b> 19:11  20:7  <b>new</b> 15:1,2  <b>news</b> 3:19,21  <b>notary</b> 19:19  <b>note</b> 8:13 9:24  11:13  <b>noted</b> 11:1 15:5  <b>notice</b> 3:11,14  3:18,20,23  <b>noticed</b> 8:15  10:7  <b>notices</b> 10:15  <b>november</b>  14:16,19 15:23  <b>number</b> 6:14</p>	<p><b>officer's</b> 9:16  <b>official</b> 9:10  <b>once</b> 5:14 6:2  <b>online</b> 8:2,15  10:7  <b>open</b> 8:9 10:9  17:22  <b>operation</b>  13:15  <b>operations</b> 1:2  6:16 12:17  16:22  <b>opportunity</b>  8:14  <b>options</b> 5:16  <b>order</b> 9:18  <b>organization</b>  11:18  <b>outcome</b> 19:16  20:12  <b>outside</b> 11:18  <b>outweigh</b> 11:9  <b>own</b> 6:19 7:7</p>	<p><b>participating</b>  7:6  <b>particulate</b> 1:1  6:15 12:16,19  15:14 16:21  <b>parties</b> 19:12  19:14 20:8,11  <b>partnered</b>  11:18  <b>party</b> 10:19  <b>past</b> 13:14  <b>peak</b> 13:21  <b>pennsylvania</b>  19:20  <b>people</b> 13:24  <b>period</b> 9:7 10:8  <b>periods</b> 13:11  13:19,23  <b>permitted</b> 9:22  <b>pertinent</b> 8:24  <b>petition</b> 13:9  14:4  <b>physical</b> 10:13  <b>physically</b> 7:8  <b>piece</b> 13:16,17  <b>place</b> 8:21  <b>plan</b> 12:21,22  12:22 13:2,7  13:13 14:5,6,9  14:15,18,21,22  14:24 15:8,10  15:13 16:4</p>
	<p><b>o</b></p> <p><b>o</b> 5:1  <b>objective</b> 16:5  <b>october</b> 15:21  <b>offending</b>  14:23  <b>offer</b> 7:3 8:14  9:5 10:5  <b>offers</b> 5:8</p>	<p><b>p</b></p> <p><b>p</b> 2:1,1 5:1  <b>p.m.</b> 1:10 5:3  8:17 17:16  18:4,6,7  <b>page</b> 3:2 4:2,4  6:2  <b>pangman</b> 2:3  12:6,8,9 17:3,6</p>	

<p><b>planner</b> 2:8  <b>planning</b> 12:10  <b>platform</b> 6:11  7:1  <b>platforms</b>  10:17  <b>please</b> 6:18  8:20 10:23  17:18  <b>pointing</b> 5:15  <b>policy</b> 14:8  <b>pollution</b> 13:22  <b>popping</b> 6:7  <b>portion</b> 8:9  17:16  <b>position</b> 15:7  <b>postal</b> 10:13  <b>posted</b> 7:16,24  11:15 17:4,24  <b>preferred</b> 5:17  5:18,22 6:5  <b>prepare</b> 7:13  <b>prepared</b> 7:15  20:3  <b>present</b> 7:9,13  17:21  <b>presentation</b>  4:10 8:7,11,19  12:7 16:24  <b>presented</b> 7:22  <b>previously</b> 10:4  10:15 17:23  <b>prior</b> 11:4 19:5  <b>problems</b> 14:1</p>	<p><b>procedures</b> 9:4  <b>proceeding</b>  1:13 5:6,8 7:10  9:10 11:24  18:8 20:4  <b>proceedings</b>  19:3,5,6,9 20:6  <b>process</b> 1:1  6:16 9:19  11:17 12:16  13:16,17,19  16:21  <b>program</b> 12:10  <b>proposed</b> 3:14  6:13 7:2,21  9:14 10:3  12:14 13:3  16:5,10,16,19  16:24 17:5,9  <b>proposing</b> 16:1  <b>protect</b> 12:19  <b>protection</b> 13:4  13:6,9 14:3,7  14:12 15:6,22  16:2  <b>protective</b>  15:13  <b>protocols</b> 8:20  9:21  <b>provide</b> 8:7,16  9:7 12:7  <b>providing</b> 6:24  <b>provisions</b>  13:13 14:9,14  16:8</p>	<p><b>public</b> 3:22 4:4  6:13 7:1,2 8:21  10:8,14 11:19  12:2,2,14,19  16:18 17:15,18  19:19  <b>published</b> 3:16  4:8  <b>purpose</b> 6:23  9:12 12:13  <b>pursuant</b> 7:14  <b>put</b> 11:10</p> <p style="text-align: center;"><b>q</b></p> <p><b>q&amp;a</b> 9:22  <b>qualified</b> 19:7  <b>quality</b> 1:14  2:3,5 12:6,11  12:24 15:14</p> <p style="text-align: center;"><b>r</b></p> <p><b>r</b> 1:5 2:1 5:1  6:14  <b>reasons</b> 9:20  <b>receive</b> 8:11  12:14  <b>received</b> 7:17  8:22 10:23  11:1 17:8,15  18:2  <b>record</b> 6:19,20  6:24 7:10,22  8:8 9:1,9,13,14  10:6 11:15  16:18 17:22  18:5 19:9 20:5</p>	<p><b>recorded</b> 19:6  <b>recording</b> 19:8  20:4  <b>reduced</b> 19:7  <b>reflect</b> 6:19  <b>regard</b> 6:24  9:13 10:3  <b>regarding</b>  11:22  <b>register</b> 3:14,16  4:8 8:14,17  <b>registrants</b>  8:18  <b>registration</b>  8:12 17:15  <b>regulation</b> 3:4  12:15,18,20  14:23 15:16,24  16:1,6,14,16,20  16:24  <b>regulations</b>  3:17 4:9 13:1  14:17  <b>regulatory</b> 4:6  10:3  <b>related</b> 7:23  19:11 20:7  <b>relation</b> 15:9  <b>relative</b> 19:13  20:10  <b>remain</b> 8:21  17:22  <b>remarks</b> 8:6  17:20</p>
---	---	--	---

<p><b>remember</b> 10:23  <b>remote</b> 1:13  <b>remove</b> 16:11  <b>removes</b> 14:23  <b>renar</b> 2:5  <b>repeat</b> 6:21  <b>report</b> 9:17  <b>reported</b> 1:22  <b>reporter</b> 7:12 18:5  <b>reporter's</b> 9:11 17:24  <b>required</b> 9:6 13:3  <b>requirement</b> 7:14  <b>resources</b> 6:12 12:12  <b>respective</b> 7:7  <b>response</b> 14:20 16:2  <b>resulted</b> 15:16  <b>resulting</b> 13:21  <b>review</b> 9:19  <b>reviewed</b> 9:17  <b>revised</b> 14:22  <b>revision</b> 14:23  <b>revisions</b> 6:14 7:2,21  <b>right</b> 5:2 6:5  <b>rolling</b> 15:1,19 16:12  <b>rule</b> 3:7,10 14:4 15:22</p>	<p><b>running</b> 13:21  <b>s</b>  <b>s</b> 2:1 3:1 4:1 5:1  <b>saying</b> 11:8  <b>scheduled</b> 6:18  <b>schedules</b> 6:10  <b>scientist</b> 12:9  <b>screen</b> 5:11,21 17:20  <b>second</b> 6:17  <b>secretary</b> 3:12 5:5 9:17,18 11:4,23 12:4  <b>secretary's</b> 9:5  <b>section</b> 8:2 16:8 16:8  <b>see</b> 5:12  <b>select</b> 5:12,17 5:18,20,23,24 6:3,4,5,8,8  <b>september</b> 10:9 11:2 17:23  <b>serve</b> 5:5  <b>services</b> 10:13  <b>session</b> 9:22  <b>sets</b> 12:18  <b>setting</b> 13:15  <b>settings</b> 6:1,2  <b>shah</b> 2:7  <b>show</b> 5:10,12 5:14 6:8  <b>shown</b> 14:24 16:15,18  <b>shutdown</b> 3:6,8 13:11,16,20</p>	<p>14:7,11,14  15:7,12,19  16:13  <b>sierra</b> 13:8 14:3  <b>signature</b> 19:17 20:13  <b>simply</b> 11:10  <b>single</b> 11:10  <b>singular</b> 11:9  <b>siobhan</b> 20:2 20:15  <b>sip</b> 3:7,9  <b>skills</b> 19:10 20:6  <b>slides</b> 16:18  <b>smartphone</b> 5:20  <b>smith</b> 1:8 5:4  <b>smog</b> 13:24  <b>social</b> 10:17  <b>solely</b> 8:22 11:7  <b>soon</b> 7:17 18:1  <b>speakers</b> 10:19  <b>specific</b> 14:13  <b>specifically</b> 13:12  <b>staff</b> 8:7  <b>standard</b> 9:21 15:17,18 16:11 16:14  <b>standards</b> 15:14  <b>start</b> 3:11  <b>startup</b> 3:6,8 13:11,15,20</p>	<p>14:7,10,13  15:7,11,19  16:12  <b>state</b> 3:21,22 6:11 12:21,21 13:2,6,13 14:5 14:6,8,14,18,20 14:21,24 15:8 15:9,12,16,23 16:3,13  <b>stated</b> 10:4,8  <b>statement</b> 4:7  <b>states</b> 12:23 13:2  <b>statutory</b> 7:14 9:12  <b>stopping</b> 13:17  <b>street</b> 1:15  <b>strikeout</b> 15:1  <b>subject</b> 8:23,24 11:7  <b>submission</b> 11:19  <b>submissions</b> 10:22 14:15  <b>submit</b> 11:20 12:3 13:3 17:18  <b>submittal</b> 3:9 14:22 15:24  <b>submitted</b> 10:10,17 11:14 14:20  <b>subsection</b> 15:2</p>
--	--	--	---

<p><b>sudden</b> 13:18  <b>suite</b> 1:15  <b>supervisor</b> 2:5  <b>support</b> 3:4  16:19  <b>supported</b>  11:11  <b>sworn</b> 19:5</p>	<p><b>together</b> 7:5  <b>tonight</b> 6:18  7:8,23 9:10,15  10:1,2 11:24  17:17  <b>tonight's</b> 5:6,7  8:12,23 9:12  11:8</p>	<p><b>unavoidable</b>  13:18  <b>under</b> 8:2  <b>underlying</b>  15:4  <b>update</b> 16:6  <b>updates</b> 12:14  <b>upper</b> 6:6  <b>use</b> 5:9  <b>using</b> 5:20  10:17</p>	<p><b>water</b> 1:15  <b>ways</b> 12:3  <b>weader</b> 1:22  19:2,18  <b>web</b> 4:4  <b>webpage</b> 7:16  7:20,24 8:1,3  10:11,14 11:16  17:4 18:1  <b>website</b> 4:5  <b>websites</b> 11:19  <b>weight</b> 11:3,11  <b>west</b> 1:15  <b>wish</b> 17:17  <b>wished</b> 8:16  <b>wishes</b> 9:4 10:4  <b>witness</b> 19:4  <b>writing</b> 17:18  <b>written</b> 10:16  10:20,21</p>
<p><b>t</b></p>	<p><b>took</b> 14:3  <b>towards</b> 8:3  <b>transcriber</b>  20:1  <b>transcript</b> 7:13  7:16 9:11,15  17:24 20:3,5  <b>transcriptionist</b>  19:8  <b>translation</b>  5:16 6:3  <b>treated</b> 13:13  <b>treatment</b>  13:10  <b>true</b> 19:9 20:5  <b>tuesday</b> 1:9 5:3  <b>turning</b> 8:6  <b>twitter</b> 10:18  <b>two</b> 6:22 16:18  <b>typewriting</b>  19:7</p>	<p><b>v</b></p>	<p><b>variation</b> 5:8  <b>various</b> 12:3  <b>verbal</b> 8:9,12  8:15,16 17:16  <b>verbatim</b> 7:13  9:11  <b>version</b> 14:22  15:16  <b>versions</b> 17:8  <b>vet</b> 12:1  <b>videoconfere...</b>  2:4,6,7,8  <b>videos</b> 10:18  <b>virtual</b> 6:11,13  8:24  <b>virtually</b> 7:5,9  7:12 17:21  <b>visit</b> 7:19  <b>votes</b> 11:10</p>
<p><b>t</b> 3:1 4:1  <b>taken</b> 19:3,12  20:9  <b>technical</b> 3:4  <b>testifying</b> 19:5  <b>text</b> 10:18 15:4  <b>thank</b> 6:9 17:1  17:2,7  <b>theresa</b> 1:8 5:4  <b>thing</b> 11:9  <b>third</b> 10:19  <b>thorough</b> 6:20  <b>thoroughly</b>  12:1  <b>thousand</b> 11:12  <b>three</b> 5:13,24  <b>time</b> 5:3 6:10  8:18  <b>times</b> 13:22  15:3 16:15  <b>tina</b> 2:8  <b>title</b> 12:15  14:16 16:19  <b>today</b> 8:18  17:16</p>	<p><b>u</b></p>	<p><b>w</b></p>	<p><b>x</b></p>
	<p><b>u.s.</b> 10:12  <b>u.s.p.s.</b> 10:24  <b>ultimate</b> 11:22  <b>ultimately</b> 9:18</p>	<p><b>want</b> 11:13</p>	<p><b>x</b> 3:1 4:1</p>
			<p><b>y</b></p>
			<p><b>yagna</b> 2:7  <b>youtube</b> 10:18</p>
			<p><b>z</b></p>
			<p><b>zoom</b> 7:8</p>