

In the Matter Of:

Department of Natural Resources & Environmental Control

Proposed Revisions to Delaware's State Implementation Plan Delaware 2017

Hearing

August 26, 2020

Wilcox & Fetzer

1330 King Street

Wilmington, DE 19801

email: depos@wilfet.com, web: www.wilfet.com

phone: 302-655-0477. fax: 302-655-0497



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

3 RE: Proposed Revisions to Delaware's)
4 State Implementation Plan)
5 Delaware 2017 Base Year SIP)
6 Emissions Inventory under the)
7 2015 Ozone National Ambient Air)
8 Quality Standard (NAAQS))
9 Docket #2020-R-A-0011)

10
11 Virtual Public Hearing
12 Dial-In Number: 1-408-418-9388
13 Access Code: 718 369 262
14
15 Wednesday, August 26, 2020
16 6:00 p.m.

17

18 BEFORE: Theresa Newman, Hearing Officer
19
20 FOR THE DIVISION: Jacquelyn Cuneo, Engineer
21 DNREC Division of Air Quality

22 -- Transcript of Proceedings --

23 WILCOX & FETZER
24 1330 King Street
Wilmington, DE 19801
(302) 655-0477
www.wilfet.com

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
Introduction by Ms. Cuneo	9
Entry of Exhibits 1 through 14	17
Conclusory Remarks by Ms. Newman.	17
Certificate of Reporter	18



1 MS. NEWMAN: Good evening. I
2 believe everyone is now connected and ready
3 to go, so we are going to go ahead and begin
4 the virtual public hearing.

5 I want to thank you all for taking
6 the time out of your busy schedules to
7 connect with us today. The date is
8 Wednesday, August 26, 2020, and we are here
9 this evening to provide a virtual platform
10 for the State of Delaware's Department of
11 Natural Resources and Environmental Control
12 on the Proposed Revisions to Delaware's State
13 Implementation Plan for the 2017 Base Year
14 SIP Emissions Inventory under the 2015 Ozone
15 National Ambient Air Quality Standard, also
16 known as the NAAQS.

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

21 There have been changes made to
22 DNREC's standard hearing protocols,
23 necessitated by the Delaware's ongoing state
24 of emergency due to the COVID-19 pandemic.



1 First and foremost, this hearing is
2 being conducted virtually. Staff is not all
3 in one location. Everyone is participating
4 independently at their own respective
5 locations.

6 While there is no sign-in sheet to
7 document physical attendance tonight, WebEx
8 does generate a list of those that are
9 virtually present for the proceeding so that
10 the Department can still have a recording of
11 those who have electronically joined us for
12 this event.

13 At the conclusion of these
14 introductory remarks, I will be turning the
15 hearing over to Department staff, who will be
16 making a formal presentation regarding the
17 matter before us tonight for the benefit of
18 the formal hearing record.

19 There is a court reporter virtually
20 present, who will prepare a verbatim
21 transcript of the hearing pursuant to the
22 statutory requirements for DNREC to have the
23 same prepared. And, as always, that
24 transcript will be posted on a hearing web



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

3 To ensure that everyone is enabled
4 to offer their comments for inclusion into
5 the record being generated in this matter,
6 the record will remain open for 15 days
7 following tonight's hearing.

8 In complex cases and, in the event
9 a request for a longer comment period is
10 received, an extension of the time for a
11 public comment may be granted.

12 I would encourage those who have
13 joined the hearing this evening to check the
14 web page dedicated to the public hearing
15 matter by going to DNREC's web page and
16 clicking on the tab for Administrative Law
17 Section, and viewing all related details to
18 this hearing.

19 All mechanisms previously available
20 by which to offer comment remain -- the
21 electronic comment form, via e-mail, and via
22 USPS. Also, the following protocols remain
23 in place for all DNREC public hearings:

24 All comments received must be



1 limited solely to the subject matter of
2 tonight's hearing. All comments pertinent to
3 the subject matter of this virtual hearing
4 will be incorporated into the record being
5 generated in this matter.

6 In order to ensure that everyone
7 who wishes to offer comment for Secretary's
8 consideration is accommodated, the record in
9 this matter shall remain open for a full 15
10 days following tonight's proceeding, or
11 through Thursday, September 10, 2020.

12 There is one authentic record of
13 this formal proceeding tonight, and it is the
14 official court reporter's verbatim
15 transcript.

16 The statutory purpose of tonight's
17 hearing is to build a record with regard to
18 the aforementioned proposed State
19 Implementation Plan. A record consisting of
20 tonight's transcript hearing, all written
21 comments, all exhibits, and my report will be
22 reviewed by the Secretary.

23 The Secretary will ultimately issue
24 an order following that review process,



1 containing his decision in this matter and
2 the reasons therefor.

3 There will be no Q and A sessions
4 permitted during the hearing, nor will any
5 realtime comments be accepted via this
6 virtual permit platform during the course of
7 tonight's proceeding.

8 Lastly, it is important to note
9 that no decision has already been made by the
10 Department, nor will any decision be made
11 tonight with regard to the matter before us.

12 Again, the record being generated
13 in this matter shall remain open for an
14 additional 15 days from today's date so that
15 members of the public have ample opportunity
16 to offer written comment for the Secretary's
17 consideration, should they wish to do so.

18 Written comment may be received by
19 the Department through Thursday,
20 September 10, 2020.

21 Comments may be submitted through a
22 comment form link out of the hearing web page
23 or via e-mail at
24 DNRECHearingComments@delaware.gov, or via the



1 U.S. Postal Service at the physical address
2 for DNREC indicated at the hearing web page
3 and/or the public notices previously issued
4 in this matter.

5 Written comments to DNREC may not
6 be submitted using social media platforms
7 such as Twitter, Facebook, YouTube, or text
8 messaging.

9 It is important to note that all
10 comment, received either through the USPS or
11 via the electronic mechanisms noted just now,
12 as long as it is received by the Department
13 on or before September 10, 2020, will bear
14 the same exact weight and will be considered
15 equally by the Secretary prior to making his
16 final decision in this matter.

17 The ultimate decision regarding
18 this matter is made by DNREC Secretary
19 Garvin. This formal hearing acts as a
20 mechanism to enable the Department to
21 thoroughly vet the proposed action to the
22 public and to let the public know the various
23 ways which comment may be submitted for the
24 Secretary's consideration if so desired.



1 With that being said, I am going to
2 hand it over to Ms. Cuneo -- sorry -- Cuneo
3 with the Division of Air.

4 MS. CUNEO: Good evening. My name
5 is Jacquelyn Cuneo, and I'm an engineer with
6 the Airshed Planning and Inventory Group for
7 the Division of Air Quality in the Delaware
8 Department of Natural Resources and
9 Environmental Control.

10 The purpose of this hearing is to
11 receive public comments on the proposed State
12 Implementation Plan revision to address the
13 Delaware 2017 Base Year State Implementation
14 Plan Emissions Inventory under the 2015
15 National Ambient Air Quality Standards for
16 ground-level ozone.

17 The State Implementation Plan is a
18 plan that identifies how a state will attain
19 and maintain air quality, in order to conform
20 to each primary and secondary National
21 Ambient Air Quality Standard.

22 Delaware's initial State
23 Implementation Plan was approved by the
24 Environmental Protection Agency on May 31,



1 1972. Since this initial approval, the
2 Delaware State Implementation Plan has been
3 revised numerous times to address air quality
4 nonattainment and maintenance issues.

5 These edits or additions to the
6 original State Implementation Plan, or
7 "revisions," as they are commonly referred
8 to, occur by updating plans and inventories,
9 and adding new and revised regulatory control
10 requirements.

11 Delaware's State Implementation
12 Plan is compiled in Title 40 of the Code of
13 Federal Regulations at Part 52, Subpart I.

14 The Federal Clean Air Act, as
15 amended by the Clean Air Act Amendments of
16 1990, requires all areas of the nation to
17 attain and maintain compliance with the
18 National Ambient Air Quality Standards.
19 These federal standards are designed to
20 protect the public health and welfare from
21 six criteria pollutants, one of which is
22 ozone.

23 On October 1, 2015, the
24 Environmental Protection Agency promulgated a



1 revised National Ambient Air Quality Standard
2 for ground-level ozone, from 0.075 parts per
3 million to 0.070 parts per million.

4 Promulgation of a revised National
5 Ambient Air Quality Standard triggers a
6 requirement for the Environmental Protection
7 Agency to designate areas as nonattainment,
8 attainment, or unclassifiable, and to
9 classify the nonattainment areas based upon
10 the severity of nonattainment at the time of
11 designation.

12 New Castle County, Delaware, was
13 designated as marginal nonattainment as part
14 of the Philadelphia-Wilmington-Atlantic City
15 nonattainment area for the 2015 ozone
16 National Ambient Air Quality Standard,
17 effective August 3, 2018.

18 Kent and Sussex counties were
19 designated as attainment areas for the 2015
20 ozone National Ambient Air Quality Standard,
21 also effective August 3, 2018.

22 Depending on the classification of
23 nonattainment counties within a state, states
24 are required to submit State Implementation



1 Plan revisions to demonstrate how they are
2 complying with the mandatory plan submission
3 requirements for non-attainment areas under
4 the Clean Air Act.

5 With each new National Ambient Air
6 Quality Standard, the Environmental
7 Protection Agency summarizes the plan
8 requirements to implement the provisions of
9 the Clean Air Act which are applicable to
10 attainment and nonattainment areas, or
11 implementation plan requirements, as these
12 are more commonly known.

13 The Environmental Protection Agency
14 finalized the Implementation Plan
15 Requirements for the 2015 ozone National
16 Ambient Air Quality Standard on December 6,
17 2018.

18 As a marginal nonattainment area,
19 New Castle County is subject to specific
20 requirements in this final rule. Delaware is
21 addressing one State Implementation Plan
22 requirement in this hearing.

23 The State Implementation Plan
24 requirement which Delaware is addressing is



1 the Base Year Inventory. Delaware is
2 required to submit a comprehensive, accurate,
3 current inventory of actual emissions from
4 sources of volatile organic compounds and
5 nitrogen oxides emitted within the boundaries
6 of the nonattainment area.

7 The State Implementation Plan
8 revision being proposed this evening is the
9 Delaware 2017 Base Year Emissions Inventory
10 for Volatile Organic Compounds, Nitrogen
11 Oxides, and Carbon Monoxide for Areas of
12 Marginal Nonattainment under the 2015 ozone
13 National Ambient Air Quality Standard.

14 The Department now enters the
15 following exhibits into the public record to
16 support the approval of the State
17 Implementation Plan revisions:

18 Exhibit 1: The final rule for the
19 promulgation of the 2015 ozone National
20 Ambient Air Quality Standard, dated
21 October 26, 2015, which was published in
22 Volume 80 of the Federal Register, beginning
23 on Page 65292.

24 Exhibit 2: The final rule for the



1 designation of areas as nonattainment from
2 the 2015 ozone National Ambient Air Quality
3 Standard, dated June 4, 2018, which was
4 published in Volume 83 of the Federal
5 Register, beginning on Page 25776.

6 Exhibit 3: The final rule of
7 implementation plan requirements for the 2015
8 ozone National Ambient Air Quality Standard,
9 dated December 6, 2018, which was published
10 in Volume 83 of the Federal Register,
11 beginning on Page 62998.

12 Exhibit 4: The Register Notice
13 which appeared in the Delaware Register of
14 Regulations, Issue Date August 1, 2020,
15 Volume 24 - Issue 2, Page 183.

16 Exhibit 5: The affidavit and
17 public hearing notice as it appeared in the
18 July 19, 2020 Delaware State News that
19 advertised today's public hearing.

20 Exhibit 6: The affidavit and
21 public hearing notice as it appeared in the
22 July 19, 2020 News Journal that advertised
23 today's public hearing.

24 Exhibit 7: The public hearing



1 notice for today's public hearing, on the
2 State of Delaware Public Meeting Calendar, as
3 dated July 17, 2020.

4 Exhibit 8: The public hearing
5 notice for today's public hearing, as posted
6 on the website for DNREC Public Hearings,
7 dated July 16, 2020.

8 Exhibit 9: The 2017 Base Year
9 Emissions Inventory State Implementation Plan
10 for Volatile Organic Compounds, Nitrogen
11 Oxides, and Carbon Monoxide for Areas of
12 Marginal Nonattainment of the 2015 ozone
13 National Ambient Air Quality Standard in
14 Delaware, as proposed in the Delaware
15 Register on August 1, 2020.

16 Exhibit 10: The "Declaration of a
17 State of Emergency for the State of Delaware
18 Due to a Public Health Threat," as issued by
19 Delaware Governor John Carney on March 12,
20 2020.

21 Exhibit 11: A proclamation by
22 Governor John Carney, dated March 13, 2020,
23 authorizing all meetings of public bodies to
24 be conducted electronically until further



1 notice.

2 Exhibit 12: The Press Release
3 issued by the Department of Natural Resources
4 and Environmental Control on March 17, 2020
5 announcing "changes to operations due to
6 COVID-19," to include a notice that "hearings
7 for permits, regulations and appeals are
8 being moved to phone or video for public
9 access."

10 Exhibit 13: A copy of the
11 Department of Natural Resources and
12 Environmental Control's website discussing
13 updates to services related to COVID-19, as
14 published on March 19, 2020. This website
15 also announced that all Department public
16 hearings will be virtual until further
17 notice.

18 Exhibit 14: The Press Release
19 issued by the Department of Natural Resources
20 and Environmental Control on March 20, 2020,
21 stating that, "Public hearings will be
22 available via phone or video conference" and
23 that, "The public will be able to submit
24 comments about the subject of each hearing



1 via e-mail, online form, or regular mail."

2 This completes the Department's
3 presentation of the proposed revisions to
4 Delaware's State Implementation Plan for 2015
5 ozone National Ambient Air Quality Standard.
6 Thank you.

7 MS. NEWMAN: Thank you. I have
8 received electronic format of the
9 Department's exhibits, and I hereby mark
10 those exhibits into the formal record as
11 Department Exhibits 1 through 14.

12 Before we close out, Ms. Cuneo, is
13 there anything that you would like to add?

14 MS. CUNEO: No, there is not.

15 MS. NEWMAN: Okay. Thank you.
16 This will now conclude the hearing. Thank
17 you all for attending. And, again, the
18 record will remain open through September 10
19 for comments to be received pertaining to
20 tonight's hearing. The hearing is now
21 adjourned at 6:13.

22 (Concluded at 6:13 p.m.)
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, 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 31st day of August 2020.



Lorena J. Hartnett
Registered Professional Reporter



Hearing - August 26, 2020

0	4	additional 7:14
0.070 11:3	4 14:3,12	additions 10:5
0.075 11:2	40 10:12	address 8:1 9:12 10:3
1	5	addressing 12:21,24
1 10:23 13:18 14:14 15:15 17:11	5 14:16	adjourned 17:21
10 6:11 7:20 8:13 15:16 17:18	52 10:13	Administrative 5:16
11 15:21	6	advertised 14:19,22
12 15:19 16:2	6 12:16 14:9,20	affidavit 14:16,20
13 15:22 16:10	62998 14:11	aforementioned 6:18
14 16:18 17:11	65292 13:23	Agency 9:24 10:24 11:7 12:7,13
15 5:6 6:9 7:14	6:13 17:21,22	ahead 3:3
16 15:7	7	air 3:15 9:3,7,15,19,21 10:3,14,15,18 11:1,5,16,20 12:4,5,9,16 13:13,20 14:2,8 15:13 17:5
17 15:3 16:4	7 14:24	Airshed 9:6
183 14:15	8	Ambient 3:15 9:15,21 10:18 11:1,5, 16,20 12:5,16 13:13,20 14:2,8 15:13 17:5
19 14:18,22 16:14	8 15:4	amended 10:15
1972 10:1	80 13:22	Amendments 10:15
1990 10:16	83 14:4,10	ample 7:15
2	9	and/or 8:3
2 13:24 14:15	9 15:8	announced 16:15
20 16:20	A	announcing 16:5
2015 3:14 9:14 10:23 11:15,19 12:15 13:12,19,21 14:2,7 15:12 17:4	accepted 7:5	appeals 16:7
2017 3:13 9:13 13:9 15:8	access 16:9	appeared 14:13,17,21
2018 11:17,21 12:17 14:3,9	accommodated 6:8	applicable 12:9
2020 3:8 6:11 7:20 8:13 14:14,18,22 15:3,7,15,20,22 16:4,14,20	accurate 13:2	appointed 3:18
24 14:15	Act 10:14,15 12:4,9	approval 10:1 13:16
25776 14:5	action 8:21	approved 9:23
26 3:8 13:21	acts 8:19	area 11:15 12:18 13:6
3	actual 13:3	areas 10:16 11:7,9,19 12:3,10 13:11 14:1 15:11
3 11:17,21 14:6	add 17:13	attain 9:18 10:17
31 9:24	adding 10:9	attainment 11:8,19 12:10
		attendance 4:7
		attending 17:17
		August 3:8 11:17,21 14:14 15:15
		authentic 6:12



<p>authorizing 15:23</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p>Base 3:13 9:13 13:1,9 15:8</p> <p>based 11:9</p> <p>bear 8:13</p> <p>begin 3:3</p> <p>beginning 13:22 14:5,11</p> <p>benefit 4:17</p> <p>bodies 15:23</p> <p>boundaries 13:5</p> <p>build 6:17</p> <p>busy 3:6</p> <hr/> <p style="text-align: center;">C</p> <hr/> <p>Calendar 15:2</p> <p>Carbon 13:11 15:11</p> <p>Carney 15:19,22</p> <p>cases 5:8</p> <p>Castle 11:12 12:19</p> <p>check 5:13</p> <p>City 11:14</p> <p>classification 11:22</p> <p>classify 11:9</p> <p>Clean 10:14,15 12:4,9</p> <p>clicking 5:16</p> <p>close 17:12</p> <p>Code 10:12</p> <p>comment 5:9,11,20,21 6:7 7:16,18, 22 8:10,23</p> <p>comments 5:4,24 6:2,21 7:5,21 8:5 9:11 16:24 17:19</p> <p>commonly 10:7 12:12</p> <p>compiled 10:12</p> <p>completes 17:2</p> <p>complex 5:8</p> <p>compliance 10:17</p> <p>complying 12:2</p>	<p>compounds 13:4,10 15:10</p> <p>comprehensive 13:2</p> <p>conclude 17:16</p> <p>concluded 17:22</p> <p>conclusion 4:13</p> <p>conducted 4:2 15:24</p> <p>conference 16:22</p> <p>conform 9:19</p> <p>connect 3:7</p> <p>connected 3:2</p> <p>consideration 6:8 7:17 8:24</p> <p>considered 8:14</p> <p>consisting 6:19</p> <p>control 3:11 9:9 10:9 16:4,20</p> <p>Control's 16:12</p> <p>copy 16:10</p> <p>counties 11:18,23</p> <p>County 11:12 12:19</p> <p>court 4:19 6:14</p> <p>COVID-19 3:24 16:6,13</p> <p>criteria 10:21</p> <p>Cuneo 9:2,4,5 17:12,14</p> <p>current 13:3</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>date 3:7 7:14 14:14</p> <p>dated 13:20 14:3,9 15:3,7,22</p> <p>days 5:6 6:10 7:14</p> <p>December 12:16 14:9</p> <p>decision 7:1,9,10 8:16,17</p> <p>Declaration 15:16</p> <p>dedicated 5:1,14</p> <p>Delaware 9:7,13 10:2 11:12 12:20, 24 13:1,9 14:13,18 15:2,14,17,19</p> <p>Delaware's 3:10,12,23 9:22 10:11 17:4</p> <p>demonstrate 12:1</p> <p>Department 3:10 4:10,15 7:10,19 8:12,20 9:8 13:14 16:3,11,15,19</p>	<p>17:11</p> <p>Department's 17:2,9</p> <p>Depending 11:22</p> <p>designate 11:7</p> <p>designated 11:13,19</p> <p>designation 11:11 14:1</p> <p>designed 10:19</p> <p>desired 8:24</p> <p>details 5:17</p> <p>discussing 16:12</p> <p>Division 9:3,7</p> <p>DNREC 4:22 5:23 8:2,5,18 15:6</p> <p>DNREC's 3:22 5:15</p> <p>DNRECHEARINGCOMMENTS@ DELAWARE.GOV 7:24</p> <p>document 4:7</p> <p>due 3:24 15:18 16:5</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p>e-mail 5:21 7:23 17:1</p> <p>edits 10:5</p> <p>effective 11:17,21</p> <p>electronic 5:21 8:11 17:8</p> <p>electronically 4:11 15:24</p> <p>emergency 3:24 15:17</p> <p>emissions 3:14 9:14 13:3,9 15:9</p> <p>emitted 13:5</p> <p>enable 8:20</p> <p>enabled 5:3</p> <p>encourage 5:12</p> <p>engineer 9:5</p> <p>ensure 5:3 6:6</p> <p>enters 13:14</p> <p>Environmental 3:11 9:9,24 10:24 11:6 12:6,13 16:4,12,20</p> <p>equally 8:15</p> <p>evening 3:1,9 5:13 9:4 13:8</p> <p>event 4:12 5:8</p>
---	---	--

exact 8:14

Exhibit 13:18,24 14:6,12,16,20,24
15:4,8,16,21 16:2,10,18

exhibits 6:21 13:15 17:9,10,11

extension 5:10

F

Facebook 8:7

federal 10:13,14,19 13:22 14:4,10

final 8:16 12:20 13:18,24 14:6

finalized 12:14

foremost 4:1

form 5:21 7:22 17:1

formal 3:19 4:16,18 6:13 8:19 17:10

format 17:8

full 6:9

G

Garvin 3:18 8:19

generate 4:8

generated 5:5 6:5 7:12

Good 3:1 9:4

Governor 15:19,22

granted 5:11

ground-level 9:16 11:2

Group 9:6

H

hand 9:2

health 10:20 15:18

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

hearings 5:23 15:6 16:6,16,21

I

identifies 9:18

implement 12:8

implementation 3:13 6:19 9:12,13,
17,23 10:2,6,11 11:24 12:11,14,21,23
13:7,17 14:7 15:9 17:4

important 7:8 8:9

include 16:6

inclusion 5:4

incorporated 6:4

independently 4:4

initial 9:22 10:1

introductory 4:14

inventories 10:8

inventory 3:14 9:6,14 13:1,3,9 15:9

issue 6:23 14:14,15

issued 8:3 15:18 16:3,19

issues 10:4

J

Jacquelyn 9:5

John 15:19,22

joined 4:11 5:13

Journal 14:22

July 14:18,22 15:3,7

June 14:3

K

Kent 11:18

L

Lastly 7:8

Law 5:16

limited 6:1

link 7:22

list 4:8

location 4:3

locations 4:5

long 8:12

longer 5:9

M

made 3:21 7:9,10 8:18

mail 17:1

maintain 9:19 10:17

maintenance 10:4

making 4:16 8:15

mandatory 12:2

March 15:19,22 16:4,14,20

marginal 11:13 12:18 13:12 15:12

mark 17:9

matter 4:17 5:1,5,15 6:1,3,5,9 7:1,11,
13 8:4,16,18

mechanism 8:20

mechanisms 5:19 8:11

media 8:6

Meeting 15:2

meetings 15:23

members 7:15

messaging 8:8

million 11:3

Monoxide 13:11 15:11

moved 16:8

N

NAAQS 3:16

nation 10:16

National 3:15 9:15,20 10:18 11:1,4,
16,20 12:5,15 13:13,19 14:2,8 15:13
17:5

Natural 3:11 9:8 16:3,11,19

necessitated 3:23

Newman 3:1,17 17:7,15

News 14:18,22

nitrogen 13:5,10 15:10

non-attainment 12:3

nonattainment 10:4 11:7,9,10,13,
15,23 12:10,18 13:6,12 14:1 15:12

note 7:8 8:9

noted 8:11

notice 14:12,17,21 15:1,5 16:1,6,17

notices 8:3

numerous 10:3

O

occur 10:8

October 10:23 13:21

offer 5:4,20 6:7 7:16

office 3:19

official 6:14

ongoing 3:23

online 17:1

open 5:6 6:9 7:13 17:18

operations 16:5

opportunity 7:15

order 6:6,24 9:19

organic 13:4,10 15:10

original 10:6

oxides 13:5,11 15:11

ozone 3:14 9:16 10:22 11:2,15,20
12:15 13:12,19 14:2,8 15:12 17:5

P

p.m. 17:22

pandemic 3:24

part 10:13 11:13

participating 4:3

parts 11:2,3

period 5:9

permit 7:6

permits 16:7

permitted 7:4

pertaining 17:19

pertinent 6:2

Philadelphia-wilmington-atlantic
11:14

phone 16:8,22

physical 4:7 8:1

place 5:23

plan 3:13 6:19 9:12,14,17,18,23 10:2,
6,12 12:1,2,7,11,14,21,23 13:7,17
14:7 15:9 17:4

Planning 9:6

plans 10:8

platform 3:9 7:6

platforms 8:6

pollutants 10:21

Postal 8:1

posted 4:24 15:5

prepare 4:20

prepared 4:23

present 4:9,20

presentation 4:16 17:3

Press 16:2,18

previously 5:19 8:3

primary 9:20

prior 8:15

proceeding 3:20 4:9 6:10,13 7:7

process 6:24

proclamation 15:21

promulgated 10:24

promulgation 11:4 13:19

proposed 3:12 6:18 8:21 9:11 13:8
15:14 17:3

protect 10:20

Protection 9:24 10:24 11:6 12:7,13

protocols 3:22 5:22

provide 3:9

provisions 12:8

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

published 13:21 14:4,9 16:14

purpose 6:16 9:10

pursuant 4:21

Q

quality 3:15 9:7,15,19,21 10:3,18
11:1,5,16,20 12:6,16 13:13,20 14:2,8
15:13 17:5

R

ready 3:2

realtime 7:5

reasons 7:2

receive 9:11

received 5:2,10,24 7:18 8:10,12
17:8,19

record 4:18 5:5,6 6:4,8,12,17,19 7:12
13:15 17:10,18

recording 4:10

referred 10:7

regard 6:17 7:11

Register 13:22 14:5,10,12,13 15:15

regular 17:1

regulations 10:13 14:14 16:7

regulatory 10:9

related 5:17 16:13

Release 16:2,18

remain 5:6,20,22 6:9 7:13 17:18

remarks 4:14

report 6:21

reporter 4:19

reporter's 6:14

request 5:9

required 11:24 13:2

requirement 11:6 12:22,24

requirements 4:22 10:10 12:3,8,11,
15,20 14:7

requires 10:16

Resources 3:11 9:8 16:3,11,19

respective 4:4

review 6:24

reviewed 6:22

revised 10:3,9 11:1,4
revision 9:12 13:8
revisions 3:12 10:7 12:1 13:17 17:3
rule 12:20 13:18,24 14:6

S

schedules 3:6
secondary 9:20
Secretary 3:18 6:22,23 8:15,18
Secretary's 6:7 7:16 8:24
Section 5:17
September 6:11 7:20 8:13 17:18
serve 3:18
Service 8:1
services 16:13
sessions 7:3
severity 11:10
sheet 4:6
sign-in 4:6
SIP 3:14
social 8:6
solely 6:1
sources 13:4
specific 12:19
staff 4:2,15
standard 3:15,22 9:21 11:1,5,16,20
 12:6,16 13:13,20 14:3,8 15:13 17:5
standards 9:15 10:18,19
state 3:10,12,23 6:18 9:11,13,17,18,
 22 10:2,6,11 11:23,24 12:21,23 13:7,
 16 14:18 15:2,9,17 17:4
states 11:23
stating 16:21
statutory 4:22 6:16
subject 6:1,3 12:19 16:24
submission 12:2
submit 11:24 13:2 16:23
submitted 7:21 8:6,23

Subpart 10:13
summarizes 12:7
support 13:16
Sussex 11:18

T

tab 5:16
taking 3:5
text 8:7
therefor 7:2
Theresa 3:17
Threat 15:18
Thursday 6:11 7:19
time 3:6 5:10 11:10
times 10:3
Title 10:12
today 3:7
today's 7:14 14:19,23 15:1,5
tonight 4:7,17 6:13 7:11
tonight's 3:19 5:7 6:2,10,16,20 7:7
 17:20
transcript 4:21,24 6:15,20
triggers 11:5
turning 4:14
Twitter 8:7

U

U.S. 8:1
ultimate 8:17
ultimately 6:23
unclassifiable 11:8
updates 16:13
updating 10:8
USPS 5:22 8:10

V

verbatim 4:20 6:14
vet 8:21

video 16:8,22
viewing 5:17
virtual 3:4,9 6:3 7:6 16:16
virtually 4:2,9,19
volatile 13:4,10 15:10
Volume 13:22 14:4,10,15

W

ways 8:23
web 4:24 5:14,15 7:22 8:2
Webex 4:7
website 15:6 16:12,14
Wednesday 3:8
weight 8:14
welfare 10:20
wishes 6:7
written 6:20 7:16,18 8:5

Y

Year 3:13 9:13 13:1,9 15:8
Youtube 8:7