

In the Matter Of:

Department of Natural Resources & Environmental Control

Delaware Sediment & Stormwater Program

Hearing Docket #2020-R-W0012

December 01, 2020

Wilcox & Fetzer

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

3 RE: Delaware Sediment & Stormwater Program)
4 Delaware NPDES Construction General)
5 Permit and Revisions to 7 DE)
6 Administrative Code 7201, Regulations)
7 Governing the Control of Water)
8 Pollution Part 9.2)
9 Docket #2020-R-W-0012)
10 Virtual Public Hearing)

11
12 Virtual Public Hearing
13 Dial-In Number: 1-408-418-9388
14 Access Code: 173 792 2277
15
16 Tuesday, December 1, 2020
17 6:00 p.m.

18
19 BEFORE: Lisa Vest, Hearing Officer
20
21 FOR THE DIVISION: Elaine Webb, Bonnie Arvay
22 Randell Greer, Marcia Fox, Terry Deputy,
23
24 ALSO PRESENT: Sascha Mohammed

-- Transcript of Proceedings --

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1 MS. VEST: Good evening. I believe
2 that everyone is connected and ready, so we
3 are going to go ahead and begin tonight's
4 proceedings.

5 I want to thank you for taking the
6 time out of your busy schedules to join us.
7 The date is Tuesday, December 1, 2020. And
8 we are here this evening to provide the
9 virtual platform for the Department of
10 Natural Resources and Environmental Control's
11 virtual public hearing regarding the proposed
12 amendments for the Regulations Governing
13 Control of Water Pollution found in the
14 Administrative Code for the State of Delaware
15 at 7 DE Admin Code 7201.

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

20 And, again, I want to thank you for
21 taking the time to come out tonight.

22 As we all know, changes have been
23 made to DNREC's public hearing protocols,
24 originally necessitated by Delaware's ongoing



1 state of emergency due to the COVID-19
2 pandemic.

3 First and foremost, this hearing is
4 being conducted virtually. No one has
5 gathered together in the same room, and
6 everyone is participating independently at
7 their own respective locations.

8 While there are no sign-in sheets
9 to document physical attendance tonight,
10 Webex's platform does generate a list for
11 such matters, so the Department will still
12 have a record of those who have virtually
13 attended tonight. And, again, I thank you
14 for your interest in this matter.

15 At the conclusion of these
16 introductory remarks, I will be turning the
17 hearing over to representatives for the
18 Department so that they can give a
19 presentation and enter it into the record
20 that is being generated in this case.

21 There is still a court reporter
22 virtually present who will prepare a verbatim
23 transcript of the hearing tonight pursuant to
24 DNREC's statutory requirement to do so.



1 As always, that transcript will be
2 posted on the hearing webpage dedicated to
3 this hearing matter as soon as it has been
4 received.

5 Following the conclusion of the
6 Department's presentation, we will take live
7 comment from the public pursuant to the
8 pre-registration protocols that are set forth
9 on DNREC's hearing webpage.

10 The Department wishes to ensure
11 that everyone is enabled to offer their
12 comments for inclusion into the record being
13 generated in this matter. Therefore, as is
14 the case in all DNREC virtual hearings, the
15 record will remain open through December 16,
16 2020, so that the public may offer written
17 comment for the record, should they wish to
18 do so.

19 I would encourage those attending
20 tonight to check out DNREC's webpage for
21 public hearings under the Administrative Law
22 Section of the website for more detail
23 concerning this proposed regulatory matter.

24 All exhibits that will be offered



1 tonight, along with all other documentation
2 related to this proposed promulgation, will
3 be posted on the hearing webpage dedicated to
4 this matter, and so the public can gain a
5 wealth of information by reviewing the same.

6 Of course, all mechanisms
7 previously available by which to offer
8 comment remain in effect. We have electronic
9 links; we have virtual e-mail; and, of
10 course, the United States Postal Service for
11 physical written comments to be received that
12 way.

13 Please be mindful that the
14 following protocols remain in place for all
15 DNREC public hearings:

16 First, all comment received must be
17 limited solely to the subject matter of
18 tonight's hearing. All comments pertinent to
19 the subject matter will be incorporated into
20 the record being generated in this matter.

21 In order to ensure that everyone
22 who wishes to offer comment for the
23 Secretary's consideration is accommodated,
24 the record shall remain open following



1 tonight's hearing through December 16, 2020.

2 There is only one authentic record
3 of this proceeding tonight, and it is the
4 official court reporter's verbatim
5 transcript.

6 The statutory purpose of tonight's
7 hearing is to build the record with regard to
8 the Department's proposed actions. A record
9 consisting of the transcript of tonight's
10 hearing, all written comments received, all
11 exhibits, and eventually the Hearing
12 Officer's Report will be reviewed by
13 Secretary Garvin.

14 He will ultimately issue an order
15 following his review process, and that order
16 will contain his decisions on this matter and
17 the reasons therefor.

18 It is important to note that no
19 decisions have already been made by the
20 Department, nor will any decisions be made
21 tonight, with regard to this proposed
22 regulatory action.

23 Again, the public comment period
24 will remain open for 15 days following



1 tonight's proceeding. The record will close
2 for comment on December 16, 2020, thus
3 allowing members of the public to have ample
4 opportunity to offer written comment for the
5 Secretary's consideration, should they wish
6 to do so.

7 Comment may be submitted to the
8 Department through the comment form link on
9 the hearing page, via e-mail to
10 DNRECHearingComments@delaware.gov, or, as I
11 said previously, via the United States Postal
12 Service at the physical address for DNREC
13 listed on both the hearing page and the
14 public notices previously issued in this
15 matter.

16 Written comments to DNREC may not
17 be submitted using any social media platforms
18 such as Twitter, Facebook YouTube, or any
19 text messaging.

20 Lastly, please remember that all
21 comment, whether it's received through the
22 United States Postal Service or through the
23 electronic mechanisms that we just described
24 now, or for the one that is commenting live

1 tonight due to the preregistration, as long
2 as it is received by the Department on or
3 before December 16, 2020, all comments bear
4 the exact same weight, and all will be
5 considered equally by the Secretary prior to
6 his making a final decision in this matter.

7 The ultimate decision regarding
8 this proposed regulatory promulgation is made
9 by DNREC's Secretary Garvin. This hearing
10 tonight acts merely as a mechanism to enable
11 the Department to thoroughly vet the proposed
12 action to the public and to let the public
13 know the various ways by which comment can be
14 submitted for consideration if so desired.

15 That being said, it is time now for
16 the Department's presentations. I am going
17 to turn the stage, as it were, over to
18 Mr. Greer from the Department for the
19 presentation on behalf of the Department.
20 Mr. Greer, take it away.

21 MR. GREER: Thank you, Lisa. I
22 still need you to allow me to share my
23 screen, though.

24 MS. VEST: It should. Maybe there

1 is just a lag in it. It should be able to do
2 it. Hold on. Yep.

3 MR. GREER: Okay. Now it's coming
4 through. Can you see the presentation?

5 MS. VEST: You are on board.
6 Proceed.

7 MR. GREER: Okay. I'm Randy Greer.
8 I'm going to split this presentation with
9 Elaine Webb, who will be giving the first
10 part of the presentation. Elaine, are you
11 unmuted?

12 MS. WEBB: Yes. Good evening,
13 everyone. Thank you. As Randy said, I'm
14 Elaine Webb, and together with him tonight,
15 we will be providing an overview for the
16 revisions to the regulations and the Delaware
17 Construction General Permit.

18 Part 9.2 of the 7201 regulations
19 establishing requirements for stormwater
20 discharges from construction activities
21 became effective in 2006. And since that
22 time, it served as Delaware's Construction
23 General Permit as a permit by regulation.

24 Owners of construction activities



1 submitted a notice of intent and agreed to
2 comply with those regulations.

3 However, EPA requires general
4 permits to be effective for only five years,
5 at which time they would need to be reissued.

6 Next slide, please.

7 It has not changed on my screen.
8 I'm going to continue. I think it probably
9 has changed.

10 MS. VEST: It just changed, Elaine.
11 You are good.

12 MS. WEBB: Okay. To comply with
13 EPA's five-year permit requirement, DNREC has
14 developed a proposed Construction General
15 Permit, or CGP. Delaware's CGP was reviewed
16 and approved by EPA in February of 2020, and
17 DNREC provided public notice of the General
18 Permit concurrently with revisions to the
19 7201 Part 9.2 Regulation.

20 The proposed Delaware CGP will be
21 effective for five years, after which time it
22 will need to be reissued.

23 The Part 9.2 Regulations required
24 revisions so that its requirements were not



1 in conflict with the proposed CGP. In
2 addition, the Part 9.2 regulations have been
3 pared down.

4 The regulations maintain core state
5 requirements for discharges from construction
6 activities.

7 The revised regulations also
8 provide enabling language to allow for the
9 stand-alone Construction General Permit. The
10 revised 9.2 Regulations will remain in place
11 to ensure continued coverage if faced with
12 delays in reauthorization of a future CGP.

13 The proposed CGP contains more
14 specific requirements for things like
15 monitoring and reporting and will be updated
16 every five years as directed by EPA.

17 Next slide.

18 At this time I will provide an
19 overview of the proposed Construction General
20 Permit, and then I will hand it over to Randy
21 for an overview of the Part 9.2 Regulation
22 revision.

23 The CGP requires two elements to be
24 granted authorization to discharge stormwater



1 from a construction activity. The approved
2 Sediment and Stormwater Management Plan,
3 which is the plan complying with Delaware
4 state regulations serves as the SWPPP, or
5 Stormwater Pollution Prevention Plan, for the
6 construction activity.

7 The permittee must have the
8 approved plan and must submit an electronic
9 notice of intent. By completing the eNOI,
10 the permittee is agreeing to comply with the
11 conditions of the Construction General Permit
12 for that construction activity.

13 Next slide, please.

14 The CGP applies to all construction
15 activities in Delaware with the exception of
16 federal facilities, which must seek their
17 permit coverage directly from EPA. The CGP
18 applies to all construction activities with
19 land disturbances of one acre or greater, and
20 does include disturbances of less than one
21 acre when they are part of a larger common
22 plan of development or sale, such as
23 individual home lots and a larger subdivision
24 project.



1 Next slide, please.

2 Coverage under the CGP expires when
3 the CGP is reissued or expires, the plan
4 approval expires, an electronic notice of
5 termination has been completed and accepted,
6 or when the Department administratively
7 terminates coverage for the site.

8 This last item, the administrative
9 termination, is new to the CGP from the
10 previous permit by regulation.

11 The Department has experienced
12 issues with having owners never submit NOTs
13 at the end of projects, so this additional
14 permit language will enable us to
15 administratively terminate permit coverage,
16 when necessary, for projects on a
17 case-by-case basis.

18 Next slide, please. Under the
19 previous regulations, a transfer of
20 authorization to discharge was allowable when
21 a construction activity's ownership changed.
22 However, when the Department moved to the
23 electronic NOI system, this was no longer
24 possible.



1 Transfer of authorization has been
2 removed from the regulations, and it is not
3 included in the proposed CGP. If a new owner
4 or operator comes on board with a project,
5 that new owner or operator would be required
6 to submit a new eNOI, and the previous owner
7 operator would submit an eNOT to terminate
8 their permit coverage.

9 Next slide, please.

10 We bill annually to allow for
11 projects to maintain permit coverage. By
12 submitting the annual payment, the permittee
13 is agreeing to the certification language
14 allowing for continuation of permit coverage.

15 If CGP requirements change during
16 the construction period, the permittee agrees
17 to continue compliance with the current CGP.

18 The permittee is responsible for
19 maintaining approval of the Sediment and
20 Stormwater Management Plan. Sediment and
21 Stormwater Management Plans are approved for
22 five years, and the plan approval may be
23 extended upon request if the construction
24 activity is not completed within that time



1 frame.

2 Next slide, please.

3 The effluent limitations in the
4 proposed CGP mirror what had previously been
5 in the regulation.

6 There are no numeric effluent
7 limits, and the best available technology
8 approach to construction site stormwater
9 management is expected.

10 Permittees are expected to design,
11 install, and maintain effective construction
12 site stormwater management control in
13 accordance with the Delaware Sediment
14 Stormwater Regulations and the regulatory
15 guidance documents, such as the Delaware
16 Erosion and Sediment Control Handbook.

17 These controls do include pollution
18 prevention measures for pollutants other than
19 sediment.

20 Next slide, please.

21 As I stated earlier, the Delaware
22 Sediment and Stormwater Management Plan
23 serves as the SWPPP, and the plan approval is
24 valid for five years from the date of



1 approval.

2 The permittee is required to
3 conduct weekly inspections of the project.
4 The weekly inspection component has always
5 been a requirement. However, in the proposed
6 CGP, those weekly inspections now must be
7 conducted by a qualified individual who has
8 been educated as a responsible person through
9 the Department of Contractor Training Program
10 or as a Certified Construction Reviewer.

11 The Contractor Training Program is
12 slated to go online as an on-demand course in
13 the first quarter of 2021, so any permittee
14 will have the opportunity to complete this
15 training on their own to fulfill this
16 reporting requirement.

17 In the previous regulations, an
18 inspection was required after a rainfall
19 event that produced runoff. The regulations
20 did not state a rainfall amount, because
21 different sites produced different amounts of
22 runoff at different points of construction,
23 based on the land coverage cover, and also
24 intensity of rainfall can determine the



1 amount of runoff.

2 It has always been a point of
3 question for when a post-rainfall event
4 inspection needed to be completed, and the
5 Federal CGP does not require a post-rain
6 event inspection as long as weekly
7 inspections are conducted.

8 Delaware has always required weekly
9 inspections, so we have removed the post-rain
10 event review from the requirements, and that
11 does not appear in the Construction General
12 Permit.

13 Next slide, please.

14 There are standard conditions in
15 the Construction General Permit and
16 Delaware's Construction General Permit, and
17 all of those standard conditions are
18 consistent with EPA's standard conditions in
19 their Construction General Permit.

20 Next slide.

21 Finally, to summarize new
22 requirements under the proposed Delaware
23 Construction General Permit, the Department
24 can administratively terminate permit



1 coverage as needed on a case-by-case basis.
2 The transfer of authorization process has
3 been removed.

4 If a new permittee comes on board,
5 they would need to submit their own NOI, and
6 the previous permittee would submit the NOT.

7 Certification language in the
8 annual billing allows for continuation of
9 permit coverage.

10 The weekly inspections must be
11 conducted by a qualified individual who has
12 been through a Department-sponsored training.

13 And the post-rain event inspection
14 requirement has been removed.

15 This concludes the overview of the
16 Delaware Construction General Permit
17 requirement.

18 At this time I will turn it over to
19 Randy Greer for an overview of the regulation
20 revision.

21 MR. GREER: Thank you, Elaine.
22 Just by way of some background and to
23 reiterate some of the things that Elaine had
24 covered, when the Construction General Permit



1 was being developed, it became clear that the
2 underlying state regulations would need to be
3 revised due to conflicts, new language, et
4 cetera.

5 We basically made a decision that
6 we didn't want to copy the Construction
7 General Permit language into the state
8 regulatory language.

9 However, we did want to maintain a
10 core state regulatory program for discharges
11 from construction activities, so these
12 proposed changes reflect that basis.

13 Those include now enabling language
14 for the stand-alone CGP, and it will remain
15 constant, even though the CGP will be
16 reauthorized every five years; so, as a set
17 of state regulations, they don't have this
18 expiration period that the Construction
19 General Permit would have.

20 A lot of the definitions have been
21 deleted from state reg language and moved
22 over to the CGP, itself. However, some have
23 remained. So the overall NPDES Section Part
24 6 has a lot of definitions that cover that



1 old Admin Section 7201; so any definitions
2 that used to be in Part 9.2 have been deleted
3 now, but are still included in the overall
4 Part 6. And there is now a new definition of
5 the CGP, however.

6 I will now go through some of the
7 highlights in each of the sections. Part
8 9.2.1 is coverage.

9 Again, there is a reference to the
10 CGP here. It covers submittal of eNOI and
11 approval of the sediment and stormwater plan.
12 It allows co-permittees. It also allows
13 individuals to seek coverage under an
14 individual permit.

15 Section 9.2.2 is the conditions for
16 coverage. And these are analogous to the
17 standard conditions in the CGP, itself. It
18 also has a reauthorization of future CGPs,
19 but it does not necessarily require changes
20 to conditions for coverage in Part 9.2.

21 9.2.3 covers notification. And
22 this is the section that deals with
23 permitting ongoing projects. And this
24 Construction General Permit has a five-year

1 time period.

2 We wanted to make sure that
3 projects weren't caught in a situation where,
4 if they were ongoing when the permit expired,
5 that they would need to reapply for a permit;
6 so there is now language that would carry
7 over active projects from one CGP to another.
8 And also this section has the contents of the
9 eNOI submittal requirements that were removed
10 from the regulation.

11 9.2.4 is the monitoring section.
12 Elaine kind of mentioned this. It's
13 consistent with what's in the CGP for the
14 effluent limitations for construction sites.
15 But there are no numeric limits, and it
16 relies on the best available technology
17 approach.

18 The recordkeeping that was in the
19 original Part 9.2 has been deleted, and that
20 is now totally contained in the CGP.

21 9.2.5 covers the Sediment
22 Stormwater Plan. Only some minor changes
23 here. We added some references to the CGP.
24 And there is a change from the plan approval

1 period from three years to five years as the
2 result of some regulatory or legislative
3 changes to the law.

4 9.2.6 covers non-stormwater
5 discharges. And this is the list of
6 allowable non-stormwater discharges, and it
7 has been updated to align with the current
8 EPA's CGP and, thus, the Delaware CGP.

9 9.2.7, effective date of coverage:
10 Coverage commences when the Department
11 verifies the submission of an eNOI and
12 approval of the Sediment and Stormwater Plan.

13 Coverage terminates with the
14 submission of the eNOT within 60 days of
15 project completion. And the Department has
16 the ability to administratively terminate
17 coverage.

18 This is a list of the exhibits that
19 have been submitted in support of these
20 revisions. And that concludes the formal
21 presentation that we have.

22 MS. VEST: Okay, Mr. Greer. Thank
23 you very much for your portion of the
24 presentation. Some quick bookkeeping for the



1 record.

2 The exhibits that you have
3 included, the list of them that were up on
4 the screen just now, are they the same
5 exhibits as are the ones posted on the
6 hearing webpage under Department's proposed
7 exhibits?

8 MR. GREER: They are.

9 MS. VEST: And have they changed or
10 been revised in any way since that posting?

11 MR. GREER: They have not.

12 MS. VEST: Excellent. Let the
13 record reflect that Exhibits 1 through 12, as
14 identified both now in the presentation,
15 as well as on the hearing page dedicated to
16 this matter, are hereby formally entered into
17 the hearing record.

18 Does that conclude the Department's
19 presentation with regard to this proposed
20 action at this time? Mr. Greer?

21 MR. GREER: I'm sorry. I had
22 myself muted. Yes.

23 MS. VEST: Okay. Very good. Just
24 double checking.



1 At this time we are now going to
2 open the floor to the person that did
3 preregister for comment.

4 Again, as I said in my introductory
5 remarks, all comment bears the same weight,
6 whether it's offered live tonight at the
7 hearing or whether it was received in writing
8 either prior to tonight or up until
9 December 16th when the record closes with
10 regard to that aspect of matters being
11 entered into it.

12 So moving forward, I believe we
13 have Gregory Ewanitz. I'm sorry if I
14 mispronounced your name. Are you here,
15 Gregory?

16 MR. EWANITZ: I am. You did a fine
17 job with that.

18 MS. VEST: Excellent. Well, as you
19 can see, there are three minutes. The timer
20 will, hopefully, help you gauge your time,
21 so, you know, you are able to pace yourself,
22 I guess is the word for it.

23 And if, for any reason, you cannot
24 conclude all of your comments in the three



1 minutes, by all means, you are invited to
2 submit everything that you want to say
3 tonight in writing. So take it away.

4 MR. EWANITZ: Thank you, Lisa. I
5 would like to thank everybody at DNREC for
6 the time to parlay these comments to you.

7 I do look at many State CGPs, and
8 your draft is very concise and laid out well,
9 so I do appreciate that.

10 The first comment I had is in
11 Section B3H. It talks about pavement wash
12 waters. And I bring it up because it seemed
13 like there was a bit of a conflict.

14 B3 is for non-stormwater
15 discharges, and the latter half of B3H on
16 Page 5 says, "It is prohibited to direct
17 pavement wash waters directly into any water
18 of the U.S., stormwater inlet, or stormwater
19 conveyance unless the conveyance is connected
20 to a sediment basin, trap, or similarly
21 effective control."

22 Now, that's pretty industry
23 standard language, and I don't have a problem
24 with it. But if we move over two pages, or



1 Page 11, and we are in Section D14D, the last
2 sentence says, "It is prohibited to hose or
3 sweep track-out sediment into any stormwater
4 conveyance, storm drain inlet, or waters of
5 the state."

6 So, again, hosing or washing of any
7 kind of sediment into a storm drain
8 conveyance, inlet or water of the state, I
9 understand; but if the conveyance is
10 connected to a sediment basin or trap or some
11 on-site sediment control, it appeared that
12 the approved non-stormwater discharges did
13 allow that.

14 That same statement is also down
15 below on the same page in Section D15D. It
16 says again, "It is prohibited to hose down or
17 sweep soil or sediment accumulated on
18 pavement or other impervious surfaces into
19 any stormwater conveyance, storm drain inlet,
20 or water of the state."

21 So I do ask that we make those two
22 sections in D14 and D15 consistent with the
23 allowable non-stormwater discharge of wash
24 water being allowed to occur in a conveyance,



1 if the conveyance is connected to an on-site
2 sediment control like a sediment basin or
3 sediment trap.

4 And I think I have one more.

5 On Page 15, Section D41, we are
6 talking about our pollution prevention
7 measures, which are pretty straightforward.

8 The one question I did have in D41,
9 you want material inventory, you want to
10 document the storage and use of the following
11 materials. And some of these kind of jumped
12 out at me, like wood scraps.

13 I understand documenting the
14 storage of building materials and
15 construction waste materials. You know,
16 typically we do that on site map or somewhere
17 in the SWPPP or sediment SSMP, but
18 documenting the use of these things kind of
19 confused me a bit.

20 So I ask that it be removed, the
21 term "use," or DNREC will offer further
22 information or clarification on that.

23 MS. VEST: Thank you, Mr. Ewanitz.

24 As you see, you timed that pretty well --



1 MR. EWANITZ: I sure did.

2 MS. VEST: -- because you concluded
3 as your three minutes expired. So thank you
4 very much for your comments. And, again, if
5 you wish to supplement them, by all means do
6 so. They just have to be received by the
7 Department on or before December 16th.

8 At this point we are going to draw
9 this proceeding to a close. I want to thank
10 everybody again for taking the time to
11 attend.

12 Again, if you visit the DNREC
13 webpage, and you will see it on your screen
14 right now at de.gov/dnrehearings, all one
15 word, all of our hearings, ones that are
16 done, ones that are active, ones that are
17 coming up, they are all there in
18 chronological order.

19 You simply find this one. It's
20 near the top, because, of course, it's
21 happening now. You can enter comments by
22 clicking on the link. That will send you to
23 an exclusive in-box just for hearing
24 comments.



1 You can write to me, if you would
2 like. You can put them in the U.S. Postal
3 Service. It must be in writing. Again,
4 social media platforms are not part of that
5 capture, so you can't do it that way.

6 But, as long as we receive it in
7 writing in any one of the offered mechanisms
8 available, on or before December 16th, they
9 all bear the same weight, and they will all
10 be taken into the record and taken into
11 consideration by the Secretary prior to his
12 making a decision in this matter.

13 I want to thank everybody for
14 attending. Be safe, social distance, and
15 this meeting is adjourned.

16 (Concluded at 6:28 p.m.)

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CERTIFICATE

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

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

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office on this 3rd day of December 2020.



Lorena J. Hartnett
Registered Professional Reporter

Hearing Docket #2020-R-W0012 - December 01, 2020

#	9	
#2020-R-W-0012 1:6	9.2 1:5 10:18 11:19,23 12:2,10,21 21:2,20 22:19	ahead 3:3
1	9.2.1 21:8	align 23:7
1 1:11 2:5 3:7 24:13	9.2.2 21:15	allowable 14:20 23:6
1-408-418-9388 1:9	9.2.3 21:21	allowing 8:3 15:14
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16 5:15 7:1 8:2 9:3	9.2.7 23:9	ample 8:3
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19 2:4	A	annual 15:12 19:8
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