

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
ENVIRONMENTAL QUALITY BOARD

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IN RE: PROPOSED RULEMAKING FOR THE TRIENNIAL REVIEW OF
WATER QUALITY STANDARDS

PUBLIC HEARING

* * * * *

BEFORE: LAURA FUSARE EDINGER, Regulatory
Coordinator Policy Office, PA DEP, Chair
THOMAS A. BARRON, Pennsylvania DEP,
Environmental Group Manager, Bureau of
Clean Water

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HEARING: Thursday, December 14, 2017
2:01 p.m.

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Southwest Regional Office
Waterfront A&B Conference Rooms
400 Waterfront Drive
Pittsburgh, PA 15222

Reporter: Juliette J. Hoffman

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NONE OFFERED

P R O C E E D I N G S

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2 -----
3 MS. EDINGER: Good afternoon. I would
4 like to welcome you to the Environmental Quality
5 Board, EQB's, public hearing on the proposed
6 rulemaking for the Triennial Review of Water Quality
7 Standards. My name is Laura Edinger. I am the
8 Regulatory Coordinator for the Department of
9 Environmental Protection and I am representing the
10 EQB at today's hearing. I officially call this
11 hearing to order at 2:01 p.m.

12 For those who are new to this room, in
13 the event of an emergency, the exit is right there
14 and around the corner of the door. At this time,
15 please silence your cell phones if you haven't
16 already done so.

17 The purpose of this hearing is to
18 accept formal testimony on this proposed rulemaking.
19 The rulemaking was adopted by the EQB at its meeting
20 on April 18th, 2017.

21 This rulemaking is required for
22 Pennsylvania to comply with the federal Clean Water
23 Act, which mandates that states periodically, but at
24 least once every three years, review and revise as
25 necessary, their water quality standards.

1 Pennsylvania's water quality standards include the
2 designated uses of the surface waters of this
3 Commonwealth, along with the specific numerical and
4 narrative criteria necessary to achieve and maintain
5 those uses, and also an anti-degradation policy.

6 Essentially water quality standards
7 are in-stream water quality goals that are
8 implemented by imposing specific regulatory
9 requirements such as treatment requirements and
10 effluent limitations on individual sources of
11 pollution. This rule proposes to update the aquatic
12 life criterion for ammonia.

13 The rule also proposes updating
14 bacteria criteria by replacing the current fecal
15 coliform based criteria for water contact sports
16 during the swimming season, which is May 1st through
17 September 30th, with the U.S. Environmental
18 Protection Agency, EPA's, 2012 Recreational Water
19 Quality Criteria in Pennsylvania's surface waters.
20 The proposal will further update water quality
21 criteria for toxic substances using the latest
22 scientific information and policies developed by the
23 EPA under the Clean Water Act.

24 The rule additionally proposes to
25 clarify that for any pollutant not listed in the

1 Table 6 of the regulation, criteria in Table 5 may
2 be used to protect existing and designated usage in
3 the Great Lakes System, or that criteria will be
4 developed by the Department of Environmental
5 Protection, DEP, as needed, in accordance with this
6 chapter and the methods described in Chapter 16.

7 Further the rulemaking notes that DEP
8 has developed a new online resource to maintain a
9 publicly available list of site-specific criteria
10 that have been developed and are being used by DEP
11 in permitting and other pollution control measures.
12 This list will be routinely updated as new criteria
13 are developed or other applications and
14 implementation of existing site-specific criteria
15 are added. Corrections are proposed to the water
16 quality standards chapters for typographical and
17 translation errors and missed references associated
18 with prior rulemaking and/or publication activities.

19 The proposed corrections do not change
20 the current stream-use designations. Also of note,
21 DEP routinely reevaluates as part of its triennial
22 review of water quality standards, the two water
23 bodies where the fishable or swimmable uses
24 specified in the federal Clean Water Act required
25 uses are not being met. Pardon me. These include

1 the Harbor Basin and entrance channel to Outer Erie
2 Harbor/Presque Isle Bay and several zones within a
3 portion of the Delaware Estuary. Because the same
4 conditions and hazards for swimming exist today as
5 during the original use attainability assessments,
6 no change to the designated use is anticipated for
7 these waters.

8 In addition, limited uses for zones 3,
9 4 and the upper zone 5 of the Delaware Estuary basin
10 are incorporated into drainage lists E and G because
11 they do not meet the Section 101(a)(2) fishable
12 uses. The current designated uses within these
13 zones only include warm water fishes, maintenance
14 only, and migratory fishes, passage only, and do not
15 include propagation and thus refer to the Delaware
16 River Basin Commission's, DRBC, standards which were
17 developed to protect fish maintenance and passage
18 only.

19 Recent data and observations, however,
20 suggest recovery is occurring in propagation for
21 some species in portions of these zones. DRBC
22 initiated an evaluation of available data for
23 resident and anadromous fishes collected since 2000
24 in an attempt to quantify spawning and early life
25 stages, and the extent of successful reproduction

1 for estuarine species. DEP continues to work in
2 cooperation with the DRBC, the EPA and other DRBC
3 signatory states with regard to the recovery taking
4 place in the lower river and estuary.

5 Entities affected by this proposed
6 rulemaking may include facilities with point source
7 discharges of treated wastewater to waters of the
8 Commonwealth because all discharges are assigned
9 effluent limits consistent with achieving water
10 quality standards including all applicable water
11 quality criteria and designated uses. These
12 effluent limits are implemented through DEP's permit
13 and approval actions.

14 Overall the Commonwealth citizens and
15 natural resources will benefit from these
16 recommended changes because they provide the
17 appropriate level of protection to preserve the
18 integrity of existing and designated uses of surface
19 waters in the Commonwealth. Protecting water
20 quality protects public health, wildlife and aquatic
21 life.

22 Moving into a little housekeeping, to
23 give everyone an equal opportunity to comment on
24 this proposal we've established the following ground
25 rules.

1 I will first call upon the witnesses
2 who have preregistered to testify at this hearing.
3 Thank you for registering. After hearing from these
4 witnesses, I'll provide any other interested parties
5 who may have come to the hearing with the
6 opportunity to testify as time allows. Testimony is
7 limited to five minutes for each witness and please
8 note that written and spoken testimony both carry
9 the same weight. If you should run out of time for
10 your spoken testimony, don't worry, we will read the
11 rest of your comments in your written testimony.

12 And I'll note, too, for rulemaking,
13 any testimony that you provide will be scanned in
14 and it will be sent immediately to independent
15 regulatory review commission and the House and
16 Senate environmental resource committees and DEP as
17 a comment. So you will see that show up in the - in
18 the public eComments space. And organizations are
19 requested to designate one witness to present
20 testimony on its behalf.

21 Each witness is asked to submit three
22 written copies, if you have it, of his or her
23 testimony to aid in transcribing the hearing. I'll
24 ask you to please hand two copies to me and one copy
25 to the stenographer for - prior to presenting your

1 testimony if you haven't already done so. I have a
2 couple who were here testifying for the policy.
3 I'll ask you to please state your name, address and
4 affiliation for the record prior to presenting your
5 testimony. The EQB would appreciate your help by
6 spelling names and terms that may not be generally
7 familiar so that the transcript can be as accurate
8 as possible.

9 Because the purpose of this hearing,
10 as before, is to receive comments on the proposal,
11 EQB or DEP staff cannot address questions about the
12 proposed rulemaking during the duration of the
13 hearing, but we may address questions after the
14 conclusion of the hearing. In addition to or in
15 place of, verbal testimony presented at today's
16 hearing, interested persons may also submit written
17 comments on this proposal.

18 Again, written and verbal comments
19 hold the same weight when consideration - when
20 considered in the finalization of proposed
21 rulemaking. All comments provided become a part of
22 the official public record. All comments must be
23 received by the EQB on or before - actually, we are
24 going to be extending the public comment period. So
25 I will not say it's on or before December 29th,

1 because that will not be true for very much longer.
2 We just received a public comment requesting an
3 extension of the public comment period and in
4 addition of one public hearing in the southeast
5 region of the state.

6 We're going to honor that request, but
7 we - we just received it, so we haven't had time to
8 schedule it. And then we can determine when the
9 comment period ends until that is scheduled. As
10 soon as that is done, we'll have an end date, but
11 suffice it to say you have until some time at least
12 in January 2018. Comments should be addressed to
13 the Environmental Quality Board, which is P.O. Box
14 8477, Harrisburg, PA 17105.

15 Comments may also be submitted online
16 through eComment, which is accessible from DEP's
17 website. If you click the eComment link at the
18 bottom of DEP's home page it's www.dep.pa.gov.
19 Comments may also be submitted by email at
20 RegComments, R-E-G-C-O-M-M-E-N-T-S, @pa.gov. A
21 subject heading of the proposed rulemaking and a
22 return name and address must be included in each
23 email so we can appropriately attribute the comment.

24 All comments received at this hearing,
25 as well as written comments received by the end of

1 the public comment period, will be considered by the
2 EQB and will be included in a comment and response
3 document, which will be prepared by the Department
4 and reviewed by the EQB prior to the Board taking
5 its final action on the regulation. Anyone
6 interested in receiving a copy of today's transcript
7 hearing may contact the EQB for further information.
8 You can contact me directly. I am the liaison for
9 the Environmental Quality Board.

10 I would now like to call our first
11 commenter which is Sundara Bhandaram.

12 MS. BHANDARAM: My comment is slightly
13 different.

14 MS. EDINGER: Oh, great. Thank you.

15 MS. BHANDARAM: Good afternoon. My
16 name is Sundara Bhandaram and I am here on behalf of
17 the American Forest and Paper Association, AF&PA
18 represents the U.S. pulp, paper, packaging, tissue
19 and wood products manufacturing industry. Our
20 member company make products essential for everyday
21 life from renewable and recyclable resources and are
22 committed to continuous improvement through the
23 industry's sustainability initiative, Better
24 Practices, Better Planet 2020.

25 In Pennsylvania the industry employs

1 over 53,000 individuals with an annual payroll of
2 over \$2.8 billion. The estimated state and local
3 taxes paid by the forest products industry totals
4 \$173 million annually. Many of our members' mills
5 including those in Pennsylvania, are the economic
6 and social lynchpins of their communities because of
7 the high paying jobs they provide in addition to
8 other economic and social contributions.

9 Thank you for the opportunity to
10 testify today on the Commonwealth's consideration of
11 the Human Health Water Quality Criteria as part of
12 its triennial review.

13 Under the Clean Water Act, states have
14 the primary responsibility for developing water
15 quality standards. States typically begin that
16 process with EPA's national recommended water
17 quality criteria required by Section 304(a) of the
18 Clean Water Act. EPA issued a national update of
19 its HHWQC in 2015 that included updates to 94 human
20 health criteria.

21 Importantly, under existing
22 regulations, states are not obligated to adopt those
23 criteria exactly as EPA has issued them before
24 submitting them to EPA for approval, nor are states
25 required to implement the exact same values in the

1 equation that is used to develop the criteria. The
2 regulations also allow states to modify the national
3 criteria to reflect site-specific conditions or
4 develop other scientifically defensible criteria
5 before sending them to EPA for approval.

6 The Clean Water Act is built on a
7 foundation of cooperative federalism and the EPA has
8 emphasized that cooperative federalism is the
9 touchstone of the environmental statutes it
10 regulates. The EPA Administrator has stated that
11 the agency will give states greater flexibility to
12 implement their environmental programs in ways that
13 makes sense for the states. This flexibility in the
14 regulation and EPA's emphasis on cooperative
15 federalism give states the ability to take two
16 important steps.

17 First, a state can consider the
18 science underlying EPA's methodology and the extent
19 to which the default values in the national criteria
20 are applicable to the waters of the state. Second,
21 the state can consider the economic impacts of the
22 new criteria, especially in a case where the
23 criteria are more stringent and therefore could
24 impose significantly higher compliance costs. We've
25 been working with a number of states as they begin

1 their triennial review urging them to take these two
2 important steps before simply adopting EPA's
3 national criteria.

4 Several states have agreed to look
5 much more closely at these issues before adopting
6 the EPA criteria and no state has yet adopted the
7 national criteria in their entirety. Turning to the
8 Commonwealth's proposal to amend the rule, with some
9 exceptions the Commonwealth is proposing to adopt
10 the human health criteria EPA issued in 2015. By
11 our count, of the 94 EPA updated criteria, 55 are
12 more stringent than the current standard, sometimes,
13 many times more stringent.

14 As my colleague, Paul Wiegand, from
15 the National Council on Air and Stream Improvement
16 will testify in a moment, EPA's national criteria
17 uses extremely conservative assumptions in their
18 derivation of criteria many of which strain
19 credulity. This results in compounded conservatism
20 and unnecessarily stringent criteria that will
21 result in very stringent permit limits and higher
22 compliance costs. Yet, the incremental human health
23 protection provided by these criteria may be
24 negligible at best.

25 In light of this compounded

1 conservatism and the scientific issues Mr. Wiegand
2 will highlight states that adjust the criteria to
3 reflect the water quality characteristics of their
4 state or that use more scientifically realistic
5 assumptions in the development of their criteria
6 should easily meet the scientifically defensible
7 regulatory standard for EPA approval.

8 Based on the scientific issues, Mr.
9 Wiegand will discuss we believe the Commonwealth
10 should use the health protection target of one in a
11 million, but this should specifically target certain
12 segments of the population. Targeted protection
13 would more accurately mitigate the actual risk
14 associated with calculated HHWQC. Second, the state
15 should maintain the fish consumption rate of 17.5
16 grams a day.

17 Third, the state should use a value of
18 one for Relative Source Contribution unless
19 sufficient pollutant specific data is available to
20 calculate a different RSC. Fourth, while the
21 transition from bioaccumulation to bioconcentration
22 factors is a reasonable change, we would urge the
23 state to reconsider the methodology used by EPA,
24 which heavily relies on models from the unique Great
25 Lakes region. We also believe that the Commonwealth

1 should consider the detrimental economic impact to
2 industry of simply adopting the 2015 updated EPA
3 criteria in their entirety.

4 The recommendations put forth ensure
5 that the environment and and public health are
6 protected while also ensuring the industry's
7 competitiveness and protecting jobs and livelihood
8 of the local community.

9 Thank you for the opportunity to
10 testify today. We intend to file detailed comments
11 amplifying these key points and look forward to
12 working with the Board as they move forward on their
13 consideration of the criteria.

14 MS. EDINGER: Next we'll call Paul
15 Wiegand.

16 MR. WIEGAND: I'll leave one of these
17 with you and I'll bring you a second copy. Well,
18 thank you again for the opportunity to speak at this
19 hearing. My name is Paul Wiegand. I work with
20 NCASI. My name is spelled W-I-E-G-A-N-D. My
21 address is written on the sheet. I work for the
22 National Council Air and Stream Improvement. Our
23 organization undertakes technical studies and
24 research on behalf of forest products companies
25 across North America.

1 NCASI, as we're known, our members
2 represent 90 percent of pulp and paper for products
3 produced nationwide. Most of the forest product
4 companies in Pennsylvania are members of our
5 organization. Our scientific personnel has been an
6 actively involved in state and federal activities
7 associated with water quality criteria degradation.
8 In my remarks today subsequent technical materials
9 were provided in the comment period will hopefully
10 act to improve the scientific foundation of which
11 water quality management decisions are made here in
12 Pennsylvania.

13 In June 2015, EPA revised its
14 recommendations for human health water quality
15 criteria for 94 substances. In doing so, EPA
16 changed most of the exposure-related assumptions
17 used to derive the criteria, including fish
18 consumption rate, relative source contribution,
19 bioaccumulation factors, body weight and drinking
20 water consumption rate.

21 Some of these changes do not reflect
22 the best science and since that time all states that
23 have thoughtfully considered EPA's 2015 revised
24 criteria have chosen to depart from them in one form
25 or another in favor of better and more appropriate

1 scientific assumptions for their states. NCASI and
2 Arcadis, which is a consulting firm, have developed
3 materials to help states to contemplate the criteria
4 derivation process and thoughtfully consider
5 designing criteria that provide a reasoned and
6 transparent balance between theoretical risk, risk
7 realities and the implementation costs associated
8 with potentially excessive conservatism in EPA's
9 criteria recommendations.

10 Today I will highlight just a few of
11 these areas where conservative EPA's criteria acts
12 in a way that Pennsylvania may wish to reconsider
13 them. The remarks I make again will be supported by
14 considerable technical documentation to be provided
15 during the comment period.

16 Health Protection Targets. USEPA
17 recommends a health protection target for the
18 general population at between one in a million and
19 one in 100,000 increased lifetime cancer risk, and
20 that highly exposed sub-populations increased cancer
21 risk not exceed one in 10,000. We encourage states
22 to be specific about health protection targets for
23 at least the mean of the general population and
24 higher-end exposure segments.

25 Doing so recognizes the reality of the

1 link between risk and exposure and allows a more
2 transparent and greater appreciation of actual risk
3 associated with the calculated human health water
4 quality water criteria.

5 Fish Consumption Rate. USEPA's 2015
6 human health water quality criteria are based on a
7 fish consumption rate of 22 grams per person per
8 day. EPA's prior recommendations were at a rate of
9 17.5 grams per person per day. The difference in
10 consumption rate is based primarily on two changes,
11 neither of which suggests that people eat more fish
12 in 2015 than they did back in 2000. The first
13 change results from an improved statistical method
14 used by the Centers for Disease Control to more
15 accurately estimate lifetime fish consumption rates
16 that are obtained from short term dietary
17 consumption surveys.

18 The more accurate estimates of the
19 fish consumption rate using this CDC approach are
20 actually lower than EPA's former value. The second
21 change involves adding marine fish and a portion of
22 salmon consumption to the fish consumption rate.
23 The basis for this addition is tenuous, at best,
24 particularly for states with little or no marine
25 coastline. Importantly, the derivation of EPA's

1 fish consumption rate value is not transparent. It
2 cannot be validated because EPA will not release the
3 data used to derive that value.

4 Relative Source Contribution. EPA's
5 recommended criteria for non-carcinogenic compounds
6 include a relative source contribution of 20 percent
7 for nearly all substances. The value used for
8 nearly all criteria before 2015 was 100 percent.
9 The RSC value acts to make the human health water
10 quality criteria more stringent for nearly all
11 substances for which the RSC applies. The
12 additional stringency is by a factor of five
13 compared to the pre-2015 criteria. While ensuring
14 that toxicity thresholds are not exceeded is
15 important, EPA's approach may be extreme and
16 unwarranted in light of the numerous other
17 conservative assumptions used to derive the criteria
18 and especially when substance-specific exposure data
19 show little reasonable likelihood of other
20 significant exposure pathways.

21 Bioaccumulation Factor. EPA's revised
22 criteria are derived using substance-specific
23 bioaccumulation factors whereas the pre-2015
24 criteria were based on bioconcentration factors.
25 While the transition from BCFs to BAFs is in line

1 with accepted scientific consensus, the methodology
2 EPA used is not applicable to waters of many states
3 because it relies too heavily on models based on
4 accumulation for PCBs in the Great Lakes. PCBs are
5 not representative of most substances for which
6 criteria had been revised, and EPA has consistently
7 stated that the Great Lakes are unique in their
8 size, food web, temperature, historical pollutant
9 loading and many other factors. We hope that
10 Pennsylvania will consider whether EPA's BAFs are
11 appropriate for Pennsylvania waters.

12 Drinking Water Ingestion. EPA's
13 revised criteria used an updated drinking water
14 ingestion rate of two and a half liters per person
15 per day. This - thus, USEPA assumes that people
16 drink this amount of water every day from untreated
17 surface waters or that treated drinking water
18 contains these substances at the criteria
19 concentrations 100 percent of the time over a
20 lifetime.

21 PA DEP might consider whether this
22 assumption is rational and appropriate for purposes
23 of ambient water quality criteria. The 2015 revised
24 criteria also includes several implicit assumptions,
25 that is, assumptions that affect the calculated

1 criteria, but are not parameterized in the criteria
2 derivation equation used by USEPA. Examples include
3 explicit assumptions that assume waters have a
4 constant chemical concentration equal to the human
5 health water quality criteria, that chemical
6 concentrations are not when fish are cooked, that
7 people drink untreated surface water, that people
8 consume fish and water at the maximum allowed
9 contaminate level continuously over their lifetime
10 and several others.

11 Some of the assumptions act to make
12 the criteria stringent and make the exposure and
13 risk communications associated with these criteria
14 much less meaningful. Combining the conservative
15 explicit and implicit assumptions described above
16 leads to the phenomenon referred to as compounded
17 conservatism, wherein the level of protection
18 afforded by human health water quality criteria is
19 far greater than the stated health protection level
20 targets.

21 Recognizing this phenomenon is
22 important and it should be thoughtfully considered
23 in light of the implementation costs and potential
24 misallocation of public and private resources that
25 may result from applying excessive conservatism when

1 deriving criteria.

2 And finally, probabilistic risk
3 assessment. The 2015 National human health water
4 quality criteria developed by EPA use a decades-old
5 risk assessment approach for which alternatives both
6 exist and are preferred by the modern risk
7 assessment community. The preferred approach, now
8 adopted by at least one state for deriving human
9 health criteria, uses probability models. Among the
10 advantages of this approach is that it applies more
11 of the available data and it creates a rational and
12 transparent link between the criteria and specific
13 health protection targets.

14 Simply put, probability models allow
15 states to confirm that they have achieved their
16 health protection target goals.

17 MS. EDINGER: I'm sorry. We're a
18 little bit over - I mean, I -.

19 MR. WIELAND: I'll finish up in 15
20 seconds. The level of effort required to address
21 the concerns that I have laid out previously is not
22 much. There are a number of resource documents
23 listed in my comments to which the state can refer.
24 Thank you very much for your time.

25 MS. EDINGER: Thank you so much.

1 Yeah. Oh, absolutely. And like we said before,
2 everything is incorporated into the record in its
3 entirety, so thank you.

4 Our next and final commentator that we
5 have preregistered is Annie Regan. Thank you very
6 much.

7 MS. REGAN: Good afternoon. Thank you
8 for providing this opportunity to give comments on
9 the Environmental Quality Board's proposed
10 rulemaking known as the Triennial Review for Water
11 Quality Standards. My name is Annie Regan,
12 A-N-N-I-E, R-E-G-A-N. I am the Southwest Outreach
13 Coordinator for PennFuture. PennFuture is a public
14 interest membership organization dedicated to
15 leading the transition to a clean energy economy in
16 Pennsylvania and beyond. PennFuture strives to
17 protect our air, water, and land, and to empower
18 citizens to build sustainable communities for future
19 generations.

20 One focus of PennFuture's work is to
21 improve and protect water resources and water
22 quality across Pennsylvania through public outreach
23 and education, advocacy and litigation. PennFuture
24 plans to submit substantive comments in writing to the
25 Environmental Quality Board. I am here today to

1 highlight a couple of points.

2 First on the bacteria standard. The
3 Board is proposing to switch from a criterion using
4 fecal coliform as the indicator of fecal
5 contamination to one using E.coli for the swimming
6 season of May 1st to September 30th when people are
7 most likely to engage in primary contact recreation.
8 Further, in selecting an acceptable level of risk of
9 sickness, the Board is proposing a criteria
10 reflecting a less protective standard, 36 illnesses
11 per 1,000.

12 PennFuture supports the switch to E.
13 coli as the indicator parameter, but recommends that
14 the Board adopt a more protective risk paradigm and
15 more stringent E. coli criteria to better pursue the
16 goal of making Pennsylvania's waters swimmable. For
17 the non-swimming season of October 1st through April
18 30th when secondary contact recreation is the norm,
19 the Board is proposing to retain the current, fecal
20 coliform-based criterion.

21 PennFuture recommends that the Board
22 retain the current, fecal coliform-based criterion
23 only if it lacks sufficient data to derive an E.
24 coli-based criterion that provides a corresponding
25 level of protection. If this is the case, the Board

1 should commit to establishing an E. coli-based
2 criteria for secondary contact recreation during the
3 next Triennial Review process.

4 The second issue I would like to
5 highlight is the Board's decision to postpone
6 indefinitely adopting an aquatic life criteria for
7 chloride or specific conductivity. The discharge of
8 chloride to Pennsylvania's waters has gone largely
9 unchecked for far too long. Elevated levels of
10 chloride are toxic to aquatic life in freshwater
11 environments, and chloride can negatively affect the
12 fish and insect community structure, diversity, and
13 productivity, even at lower levels.

14 We appreciate the efforts of the
15 Department and the Board to develop and refine a
16 chloride criteria. At some point, however, a
17 decision has to be made, subject to further revision
18 as the science inevitably evolves. The Department
19 and the Board should take action earlier if
20 possible, but should commit to adopt, no later than
21 the next triennial review, aquatic life criteria for
22 chloride. Thank you again for the opportunity to
23 present oral testimony regarding the proposed
24 Triennial annual review.

25 MS. EDINGER: I thank you all for

1 providing your written testimony. If - if you
2 wanted to - I just wanted to offer the option. If
3 you wanted to email these to me, you could and then
4 I can just - because I know there are a couple of
5 edits that were made at least one of them and I
6 didn't know - because I could just take these and
7 scan them or I -.

8 MR. WIEGAND: I'd be happy to do that.

9 MS. EDINGER: Okay.

10 MS. REGAN: I can email this right
11 away. Yeah.

12 MS. EDINGER: Perfect. That'd be
13 lovely. And then I'll make sure that they get
14 submitted as testimony presented today.

15 MS. REGAN: Thank you.

16 MS. EDINGER: Absolutely.

17 And I think - oh. Well, I think - I
18 don't see anyone else having come here. We've been
19 going for about a half hour, which is as long as
20 we've been holding the record open at previous
21 hearings.

22 So I think with that - with no other
23 commenters present and on behalf of the
24 Environmental Quality Board I hereby adjourn this
25 hearing and it's 2:32 p.m.

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Okay. Thank you very much. Thank you everyone.

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HEARING CONCLUDED AT 2:32 P.M.

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CERTIFICATE

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I hereby certify that the foregoing proceedings, a hearing held before Ms. Edinger, was reported by me on 12/14/2017, and that I Juliette Hoffman read this transcript and that I attest that this transcript is a true and accurate record of the proceeding.



Court Reporter
Juliette Hoffman