



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
ENVIRONMENTAL QUALITY CONTROL BOARD

\* \* \* \* \*

IN RE: SAFE DRINKING WATER PFAS MCL RULE  
(25 Pa. Code Chapter 109)

PUBLIC HEARING

\* \* \* \* \*

BEFORE: LAURA GRIFFIN, Chair  
Brian Chalfant, Member  
Darek Jagiela, Member  
Jennifer Swan, Member

HEARING: Tuesday, March 22, 2022  
6:04 p.m.

LOCATION: Video Hearing

WITNESSES: David Thomas Roberts, Darree Sicher  
Barbara Brandon

Reporter: Kathryn Witherow

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I N D E X

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OPENING REMARKS

By Chair

4 - 10

TESTIMONY

By David Thomas Roberts

10 - 15

TESTIMONY

By Barbara Brandom

16 - 20

TESTIMONY

By Darree Sicher

21 - 25

DISCUSSION AMONG PARTIES

25 - 26

CERTIFICATE

27

E X H I B I T S

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		Page
<u>Number</u>	<u>Description</u>	<u>Offered</u>

NONE OFFERED

P R O C E E D I N G S

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CHAIR: Good evening everyone.

I would like to welcome you to Environmental Quality Board's, or EQB, public hearing on the proposed rulemaking for the Safe Drinking Water PFAS MCL Rule.

My name is Laura Griffin. I'm the regulatory coordinator for the Department of Environmental Protection. I am facilitating this hearing on behalf of the EQB today. Assisting me today is Brian Chalfant, deputy policy director; Derek Jagiela, our host; and Jennifer Swan, who you corresponded with to register for this hearing.

I officially call this hearing to order at 6:04 p.m. A stenographer will be transcribing the hearing.

The purpose of this hearing is to formally accept testimony on the proposed rulemaking. This proposed rulemaking was adopted by the EQB at its meeting on November 16th, 2021. It proposes to set maximum contaminant level goals and maximum contaminant levels, or MCLs, for two per- and polyfluoroalkyl substances, or PFAS, just spelled P-F-A-S, and they are perfluorooctanoic

1 acid, or PFOA, P-F-O-A, and perfluorooctanesulfonic  
2 acid, or PFOS, P-F-O-S.

3 PFAS are considered emerging  
4 contaminants because research is ongoing to better  
5 understand the potential impacts PFAS pose to human  
6 and animal health and the environment. PFAS are  
7 potentially linked to a number of adverse health  
8 effects, including high cholesterol, developmental  
9 effects including low birth weight, liver toxicity,  
10 decreased immune response, thyroid disease, kidney  
11 disease, ulcerative colitis and certain cancers,  
12 including testicular cancer and kidney cancer.

13 The proposed amendments are intended  
14 to protect public health by setting State MCLs for  
15 contaminants in drinking water that are currently  
16 unregulated at the Federal level. With the proposed  
17 amendments, the Commonwealth would move ahead of the  
18 US Environmental Protection Agency, or EPA, in  
19 addressing PFOA and PFOS in drinking water and join  
20 a small group of states that have set MCLs for  
21 select PFAS in drinking water.

22 Safe drinking water is vital to  
23 maintaining healthy and sustainable communities.  
24 Proactively addressing PFOA and PFOS contamination  
25 in drinking water can reduce the incidence of

1 illness and reduce health care costs.

2           Recent research suggests that EPA's  
3 Combined Lifetime Health Advisory Level for PFOA and  
4 PFOS of 70 parts per trillion is not sufficiently  
5 protective against adverse health effects.

6           EPA has started the process of setting  
7 more stringent standards for PFOA and PFOS in  
8 drinking water, but that process is expected to take  
9 years to complete.

10           For that reason, it is important that the  
11 EQB act now to propose more protective standards for  
12 Pennsylvania, to protect the health of  
13 Pennsylvanians. Proper investment in public water  
14 system infrastructure and operations helps ensure a  
15 continuous supply of safe drinking water, enables  
16 communities to plan and build future capacity for  
17 economic growth, and ensures their long term  
18 sustainability for years to come.

19           These MCLs would apply to the  
20 following types of public water systems, community  
21 water systems, nontransient non-community water  
22 systems and bottled vended retail and bulk water  
23 systems. The rulemaking also proposes to establish  
24 monitoring requirements for PFOA and PFOS for these  
25 public water systems in order to demonstrate

1 compliance with the MCLs and to establish sampling  
2 and analytical requirements and acceptable treatment  
3 technologies for achieving compliance with the  
4 proposed MCLs.

5           This concludes the summary of the  
6 rulemaking. If you would like to access a more  
7 detailed explanation of the regulatory amendments  
8 included in this rulemaking you can visit eComments  
9 on DEP's webpage and select regulations.

10           In order to give everyone an equal  
11 opportunity to comment on this proposal I would like  
12 to establish the following rules. Brian's going to  
13 provide some of this information in the chat box so  
14 you don't need to write everything down. I will  
15 call upon the witnesses to testify at this hearing.

16       All who signed up were assigned a number indicating  
17 the order in which witnesses will be called to  
18 speak. The testimony is limited to five minutes for  
19 each witness and I will have a timer on the screen.

20       You'll see it on the right-hand side.

21           Please note that written and spoken  
22 testimony both carry the same weight. If you should  
23 run out of time for your spoken testimony, we will  
24 read the rest of your comments from your written  
25 testimony. As requested in registration

1 correspondence, please provide a copy of your  
2 written testimony to regcomments@pa.gov.

3 R-E-G C-O-M-M-E-N-T-S@P-A.G-O-V. Your e-mail must  
4 note that you are submitting testimony for proposed  
5 rulemaking, Safe Drinking PFAS MCL Rule along with  
6 the following information; your first and last name,  
7 mailing address, e-mail address and if you  
8 are commenting on behalf of an organization.

9 Testimony is not required to be five  
10 minutes long. If others who provide testimony  
11 before you are making similar statements to yours,  
12 you are free to shorten or summarize your spoken  
13 testimony and still provide your full written  
14 testimony by e-mail. Through the sign-up process  
15 prospective commenters were requested to designate  
16 one witness to present testimony on behalf of an  
17 organization. Please state your name; address, the  
18 city and state are sufficient; and your affiliation,  
19 if you have one, affiliation with an organization,  
20 for the record prior to presenting your testimony.  
21 Also the EQB would appreciate your help by spelling  
22 out your name and terms that may not be generally  
23 familiar so that the transcript can be as accurate  
24 as possible.

25 Because the purpose of a hearing is to



1 receive comments on the proposal, DEP staff cannot  
2 address questions about the proposed rulemaking  
3 during the duration of the hearing.

4           In addition to, or in place of, verbal  
5 testimony presented at today's hearing, interested  
6 persons may also submit written comments on this  
7 proposal. Again, written and verbal comments hold  
8 the same weight when considered in the finalization  
9 of this proposed rulemaking. All testimony and  
10 written comments provided become a part of the  
11 official public record.

12           All comments must be received by the  
13 EQB on or before April 27th of 2022. There are a  
14 few different ways to submit written comments which  
15 is separate from testimony. Comments may be  
16 submitted online through eComment, which is  
17 accessible from DEP's website by going to DEP's home  
18 page [www.dep.pa.gov](http://www.dep.pa.gov) and selecting eComment under the  
19 heading Public Participation at the top of the page  
20 or comments may be submitted by e-mail at  
21 [RegComments@pa.gov](mailto:RegComments@pa.gov). All comments are entered into  
22 eComment and are accessible to the public. A  
23 subject heading of the proposed rulemaking and a  
24 return name and address must be included in each e-  
25 mail. Comments may also be sent through US postal

1 mail addressed to the Environmental Quality Board,  
2 P.O. Box 8477, Harrisburg, PA 17105-8477.

3 All testimony received at this  
4 hearing, as well as written comments received by  
5 April 27th, 2022 will be considered by the EQB and  
6 will be included in a comment and response document,  
7 which will be prepared by DEP and reviewed by the  
8 EQB prior to the EQB taking its final action on this  
9 regulation.

10 I would now like to call for the first  
11 commenter. Hold on one second. Let me share my  
12 screen. All right. I'm trying to show my list of  
13 commentators who are ready and the timer.

14 My apologies. Sorry I took so long.  
15 Okay.

16 So our first commenter this evening is  
17 David Thomas Roberts with the Sierra Club Moshannon  
18 Group.

19 Are you with us, David?

20 MR. ROBERTS: Yes, I'm here.

21 CHAIR: Please go ahead.

22 MR. ROBERTS: Okay.

23 Yes. Thank you for the opportunity to  
24 comment on this proposal. I am David Thomas Roberts  
25 residing in Benner Township, Bellefonte of Centre

1 County, PA, and I'm speaking for the Sierra Club  
2 Moshannon Group as an executive committee member for  
3 water quality.

4 PFAS is a urgent public health threat  
5 requiring swift and comprehensive actions including  
6 expanded testing, public notification, mitigation,  
7 and remediation.

8 The Sierra Club Moshannon Group  
9 supports the rule promulgation to set limits on  
10 PFAS, but it should include regulation for both  
11 public and private water sources because this is  
12 affecting citizens all across the State.

13 Studies have linked PFOA and PFOS to  
14 many adverse health effects including organ and  
15 brain developmental problems in prenatal and infant  
16 children, and PFAS chemicals and their derivatives  
17 are also linked to cancer and adverse effects on  
18 vital organs and the human endocrine system.  
19 There's evidence that many PFAS compounds in  
20 addition to PFOA and PFOS are detrimental to  
21 prenatal development, childhood growth, adult human  
22 health, and the environment. The Sierra Club  
23 proposed that the control of PFAS must include  
24 additional PFAS chemicals beyond merely PFOA and  
25 PFOS to adequately protect the public health and the

1 environment.

2                   On investigation by PA DEP in 2017 of  
3 public water supplies found six other PFAS chemicals  
4 in addition to PFOS and PFOA, and these are toxic  
5 chemicals. Although many studies have focused on  
6 the toxicity of these long-chain PFOS and PFOA, the  
7 potential toxicity of the short-chain PFAS has not  
8 been given sufficient attention.

9                   The following are some examples from  
10 excerpts of scientific journals describing the  
11 toxicity of some of these compounds. PFNA,  
12 perfluorononanoic acid, is similar to PFOA causing  
13 neonatal mortality and childhood growth deficits,  
14 and it's also been found to have effects on the  
15 liver and it's an ubiquitous, persistent  
16 environmental contaminant.

17                   PFHxS, perfluorohexane sulfonate, can  
18 induce developmental toxicity in combination with  
19 endocrine disrupting substances. And PFHpA,  
20 perfluoroheptanoic acid, induces Leydig cell  
21 hyperplasia, which enlargement of cells in the  
22 testes and reduced sperm counts. PFBS,  
23 perfluorobutane sulfonate, is considered a less-  
24 toxic replacement for PFOS, however, it has shown  
25 effects on the nematode *C. elegans*, saw a reduction

1 of egg production and brood numbers. PFHxA,  
2 perfluorohexanoic acid, is also toxic. And although  
3 exposure for this PFAS chemical is considered to be  
4 mild and reversible, chronic health-based oral  
5 reference doses have been calculated because of  
6 effects on kidney renal papillary necrosis from  
7 PFHxA. PFHxA also has been found to have toxic  
8 effects on human stem cells. As well as PFBS,  
9 PFHxS, PFBA and again PFHxA affect human mesenchymal  
10 stem cells and shows developmental toxicity.

11           Epidemiological studies by the CDC,  
12 Center for Disease Control, suggest negative health  
13 outcomes from - to liver alterations, hepatic  
14 effects from PFOA, PFOS, and PFHxS; increases in  
15 serum lipid levels, total cholesterol and LDH  
16 cholesterol from PFNA and PFDA; cardiovascular  
17 effects and pregnancy-induced hypertension and pre-  
18 eclampsia from PFOA and PFOS; also immune effects  
19 and decreasing antibody response from PFHxS, PFDA,  
20 IPFNA, PFUnA, and PFDoDA; and also developmental  
21 effects and decreases in birth weight.

22           So these PFAS compounds do not break  
23 down easily and are considered to be forever  
24 chemicals. They're extremely retentive in tissues  
25 and bioaccumulate. And so since humans are top

1 consumers we are exposed to high concentrations of  
2 these chemicals, and PFAS is found in human breast  
3 milk, blood and tissue. It tends to remain the body  
4 and accumulate over time.

5           We ask that more testing is done,  
6 additional water supplies need to be tested. And  
7 for example, samples taken by PA DEP of a private  
8 drinking water well in proximity to one of these  
9 investigatory sample sites in Benner Township,  
10 Centre County had very high levels of PFAS chemicals  
11 that are toxic to human health and child  
12 development.

13           So we really need to be looking at  
14 public and private and drinking water supplies.  
15 It's affecting citizens all across the state.

16           There's deep concern about chemicals  
17 entering our wastewater disposal systems. And  
18 wastewater treatment plants are unable - most of  
19 them are unable to remove these chemicals which pass  
20 then through the plant and recycle back into the  
21 environment. So - and it's also entering into waste  
22 sludge used as biosolids applied to farm fields.  
23 And it's widely documented toxic PFAS is  
24 contaminating food including farm produce, meat  
25 products, dairy milk, and wild game. Biosolids

1 testing for PFAS should be required at all  
2 wastewater treatment plants and contaminated  
3 biosolids must be restricted from field applications  
4 to eliminate PFAS contamination of our farms, foods,  
5 agricultural system. And farmers' livelihood, our  
6 food sources are threatened by this contamination  
7 from biosolids contaminated with PFAS. Also  
8 entering -.

9 CHAIR: Sorry to interrupt you, David.

10 MR. ROBERTS: Yeah?

11 CHAIR: We're now about a minute over  
12 your time, but please do submit -

13 MR. ROBERTS: Okay. Okay.

14 CHAIR: - do submit the written copy  
15 of your testimony that way we get all of your  
16 comment.

17 MR. ROBERTS: Yes. We did that. And  
18 - and - no, I just want to say that Sierra Club  
19 supports the DEP setting the MCL standards of 18  
20 parts per trillion and 14 parts per trillion,  
21 however, we feel that there should be limits on  
22 other PFAS compounds. So thank you very much.

23 CHAIR: Thank you for your comments,  
24 David.

25 Okay. The second person we have

1 signed up to provide testimony this evening is, and  
2 I apologize if I mispronounce your name, Darree  
3 Sicher.

4 MR. JAGIELA: Laura, I don't currently  
5 see them on the line right now.

6 CHAIR: Okay.

7 Darree was there before, so we can  
8 move onto Barbara and come back to Darree when  
9 they're back on, if that's okay?

10 MS. BRANDOM: Thank you.

11 CHAIR: Barbara, are you ready?

12 MS. BRANDOM: Yes. Go ahead.

13 CHAIR: Oh, no. Please, go ahead,  
14 Barbara. Thank you.

15 MS. BRANDOM: My name is Barbara  
16 Brandom, B-R-A-N-D-O-M. I live in Pittsburgh,  
17 Pennsylvania. I've lived there 45 years. I often  
18 travel to Somerset County where it's cooler than in  
19 Pittsburgh and the air is cleaner. However, in  
20 recent years I have more concerns regarding the  
21 environment throughout Pennsylvania. That's why I'm  
22 speaking today about the need for stricter rules on  
23 polyfluoroalkyls and related compounds.

24 I used to think these toxins were not  
25 common pollutants throughout Pennsylvania, but there



1 was no evidence just because they hadn't been  
2 examined, they hadn't been looked for everywhere.  
3 Now that we know that PFAS is a component of  
4 fracking fluid there is reason to believe that it  
5 will contaminate groundwater wherever there are  
6 spills from wells, pipelines and compressor stations  
7 and wherever injection wells are located. There have  
8 been many instances when well casings crack and  
9 pipelines, well, spill.

10                   As I said to my neighbor in Somerset  
11 County, when our clean water is gone, we are done.  
12 We won't be able to drink the water or irrigate our  
13 vegetables without risk of serious disease. We  
14 won't be able to sell our property without giving  
15 serious risks to future inhabitants. I already  
16 suffer from high cholesterol and thyroid disease.  
17 Must I expect to die from cancer induced by  
18 environmental toxins? Should I warn my family not  
19 to return to Pennsylvania because of inevitable  
20 exposure to PFAS, a toxin that accumulates up the  
21 food chain and cannot be removed once it is in a  
22 human body?

23                   So I thank you for all your comments  
24 in the introduction acknowledging these problems.  
25 And I thank David Roberts from Sierra Club for

1 giving so many details about what kinds of studies  
2 have been done.

3                   The Pennsylvania Department of  
4 Environmental Resources had published a proposal  
5 rule to require maximum contaminant levels, MCLs, in  
6 public water systems. Health effects is the first  
7 line item that's to be considered when setting a  
8 MCL. This is problematic because health effects  
9 such as excess cancers, are often delayed for years  
10 after exposure to toxins. Studies of exposure to  
11 benzene, a recognized carcinogen for which there  
12 should be no safe MCL because its effect are  
13 recognized to be cumulative over a lifetime, showed  
14 increased risk of leukemia, clear increased risk,  
15 when the follow-up period was longer. Therefore,  
16 the observation of no increased risk of cancer in  
17 five years after exposure is likely to be  
18 meaningless.

19                   Estimated costs and benefits of a new  
20 rule are part of the rulemaking process. In the  
21 case of toxic environmental exposures, estimation of  
22 cost will likely be short sighted. They will be  
23 restricted to the costs of testing and communicating  
24 results and possibly cleaning up pollution rapidly.  
25 It may take years to show reduction in adverse

1 health effects, but these are of critical  
2 significance to the lives of people in polluted  
3 communities. It's not clear in the proposed  
4 rulemaking document how cancer risks have been  
5 assessed and incorporated.

6 PFAS and related compounds are toxic  
7 in very small doses. They should have been removed  
8 from drinking water many years ago. The Cambridge  
9 Environmental Consulting study recommended a MCL of  
10 1 PPT for PFOA. This is especially important for  
11 children.

12 The proposed rule will be applicable  
13 only to public water systems. The first speaker  
14 mentioned this problem. 20,000 new independent  
15 water wells may be drilled every in Pennsylvania.  
16 These families need to know if their water is  
17 contaminated. In Bucks and Montgomery Counties the  
18 PFAS Pilot Health Study found higher levels of PFAS  
19 in private wells than in the public system. So we  
20 need the new rule to have protection for all public  
21 water system and a mechanism to test private wells.  
22 I think we need more protective standards.

23 The PFOA MCL should be as low as  
24 possible but not to exceed six PPT and the PFOS MCL  
25 should be no greater than five PPT. These

1 recommendations are based on toxicological risk  
2 assessments. There should be expansion of the  
3 compounds covered as mentioned before. There should  
4 be rapid implementation of this monitoring. Don't  
5 delay. All symptoms - all systems included in  
6 rulemaking should be required to start sampling as  
7 soon as possible in 2022. There should be rigorous  
8 and ongoing monitoring. Sampling should be required  
9 annually for all systems with no waivers for  
10 anybody. For systems with detection above the MCL,  
11 monthly sampling should be required until a level is  
12 reduced below the MCL, then quarterly monitoring  
13 after that.

14 Thank you for this opportunity to  
15 speak. I was speaking for myself and as a member of  
16 the Concerned Health Professionals of Pennsylvania,  
17 their Steering Committee. So I'm very glad to see  
18 that the hearing is occurring and I'll submit some  
19 written comments also. Thank you very much.

20 CHAIR: Thank you, Barbara.

21 And I think that Darree is calling  
22 back in. I'm just going to give another minute. We  
23 have been in contact.

24 And while we're waiting, I saw that  
25 there were several people who were listening before

1 the hearing started. Since we're - it's only about  
2 6:30 and still have some time, if there's anyone who  
3 was unable to - didn't get a chance to register in  
4 advance but who is listening and wanted to make some  
5 comments, provide some testimony this evening,  
6 please feel free to message us in the chat box. We  
7 can add you to the list. We can unmute you if you  
8 would like to provide comments after our third and  
9 final registered testifier.

10 Okay. I am told that Darree has  
11 joined us. Are you there, Darree? I hope -.

12 MS. SICHER: Yes. Okay. I am.

13 CHAIR: Oh. Excellent. Wonderful.

14 Thank you for bearing with us while we  
15 got logged on. Please go ahead when you're ready.

16 MS. SICHER: Okay. Thank you for your  
17 working with it. I will follow through. My name is  
18 Darree Sicher, D-A-R-R-E-E S-I-C-H-E-R. I'm with a  
19 nonprofit organization, United Sludge Free Alliance  
20 of Kempton, Pennsylvania. So I will just jump right  
21 in.

22 Pennsylvania Department of  
23 Environmental Protection must create a meaningful  
24 and protective PFAS MCL. If water is life, we must  
25 pass serious protective PFAS regulations now.

1                    Pennsylvania holds a particularly  
2 important role in water quality, with six major  
3 watersheds, including the 15 million people who rely  
4 on the Delaware River Watershed; the 3.8 million  
5 within the Susquehanna Watershed that supports the  
6 Chesapeake Bay and the 25 million in 14 states who  
7 live within the Ohio River Watershed. Pennsylvania  
8 water is so important.

9                    Without strict PFAS regulations that  
10 are protective of our water and environment, we  
11 cannot hope to offer our citizens a healthy and safe  
12 future. Nothing's more expensive than the damage  
13 that we're causing without strong regulation on  
14 chemicals like PFAS.

15                    The Environmental Protection Agency's  
16 health advisory levels for PFAS in drinking water do  
17 nothing to offer protective measures and were not -  
18 and they're not enforceable. So without creating  
19 enforceable regulations our food and water and  
20 environment are contaminated by free flowing  
21 chemicals like PFAS.

22                    States such as Maine and Michigan are  
23 taking PFAS contamination seriously. Recently in  
24 Maine, PFAS contaminated the water supply that  
25 serves Kennebunkport, traced to a nearby farm that

1 used sewage sludge as a fertilizer 20 years ago. In  
2 North Carolina, PFAS chemicals have been found in  
3 the drinking water wells 25 miles away from the  
4 Chemours plant. And in Pennsylvania, PFAS is being  
5 found in our wildlife, including animals we consume  
6 such as deer and fish. This is not from fire  
7 fighting foam locations. It's from our poisoned  
8 water.

9           If we look at PFAS - if we look for  
10 PFAS it's there. We don't need more test cases. We  
11 don't - there's plenty of science and examples and  
12 support from states such as Maine and Michigan who  
13 are taking PFAS seriously, including banning land  
14 applied sewage sludge application due to its  
15 transfer of PFAS from soil contamination and run-  
16 off. All you have to do is look at industry giants  
17 like DuPont who have all the studies. We must move  
18 forward with protective regulations that industry  
19 and municipalities and states have to follow not  
20 just as financial interests. We have to protect our  
21 water. Water is life.

22           So look to other states and let's take  
23 our positions and the Department of Environmental  
24 Protection seriously. Close the loopholes that  
25 allow the known toxins like PFAS to poison our

1 water, our communities and our future. The  
2 Pennsylvania citizens and the nation are counting on  
3 you and on us to set real, protective and  
4 enforceable regulations.

5 I thank you for this time to speak and  
6 I appreciate the time you're taking to investigate  
7 this. So that's my - I think I'm probably five  
8 minutes.

9 CHAIR: Thank you, Darree. Actually,  
10 you still had some extra time left, but please make  
11 sure you - did you have something else you wanted to  
12 say?

13 MS. SICHER: No. I just - it's just -  
14 I just really, really stress that - like to - to  
15 think about the EPA taking years to do this, we  
16 don't need years. We know it's there. We know it's  
17 a problem. And unfortunately that's exactly the  
18 kind of thing that makes people not trust our  
19 bureaucracy and not trust our government. And -  
20 and, you know, Pennsylvania unfortunately is - ended  
21 up being an example of not taking care of their own  
22 people by not paying attention to even things like  
23 water quality. I know we can do it. We just - and  
24 I just hope everybody involved has that  
25 determination to make things better in Pennsylvania



1 and really for the millions that rely on our water.  
2 And I love it here and I want to - I want to keep  
3 having a healthy family.

4 And I actually spoke about water  
5 quality on Swedish television a couple years ago.  
6 So that's - you know, we - we are really special in  
7 Pennsylvania. So I want us to act that way. Just  
8 thank you so much for the time. I'll try to log on  
9 again just to hear what others have to say. And -  
10 and then I appreciate the time and energy everyone's  
11 putting into this. So thank you.

12 CHAIR: Okay.

13 Thank you, Darree.

14 MS. SICHER: Okay.

15 CHAIR: Okay.

16 So I've seen the request. If anyone -  
17 last and final call, if there's anyone listening who  
18 would like to provide testimony, you did - hadn't  
19 planned to but would like to.

20 Okay. I'm being told we just got a  
21 quiet audience listening. So in that case, thank  
22 you all for taking the time to provide testimony  
23 this evening. With no other commenters present, on  
24 behalf of the EQB I hereby adjourn this hearing at  
25 6:36 p.m. Thank you and have a wonderful evening.

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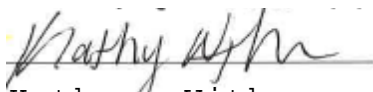
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CERTIFICATE

I hereby certify that the foregoing proceedings, hearing was held before Chair Griffin, was reported by me on March 22, 2022 and that I, Kathryn Witherow, read this transcript and that I attest that this transcript is a true and accurate record of the proceeding.

Dated the 15 day of April, 2022

  
Kathryn Witherow,

Court Reporter