

1 IN RE:

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MISSISSIPPI LIME COMPANY

3 AIR POLLUTION CONTROL CONSTRUCTION

PERMIT

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HEARING HELD AT

7 PRAIRIE DU ROCHER ELEMENTARY SCHOOL

714 MIDDLE STREET

8 PRAIRIE DU ROCHER, ILLINOIS

JUNE 2, 2014

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(Starting time of the hearing: 7:00 p.m.)

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1 TRANSCRIPT OF PROCEEDINGS

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3 MR. STUDER: All right. I've got 7 o'clock,  
4 so let's go ahead and go on the record. Good evening.  
5 My name is Dean Studer. I'm the hearing officer for  
6 the Illinois Environmental Protection Agency. On  
7 behalf of Director Lisa Bonnett, I welcome you to  
8 tonight's hearing. My purpose tonight is to ensure  
9 that this proceeding runs properly according to the  
10 rules and is conducted in a fair and efficient manner.  
11 Personally I will not be responding to specific issues  
12 related to the permit, but will defer such issues to  
13 the technical staff here with me.

14 This is an informational hearing before the  
15 Illinois EPA in the matter of a new air pollution  
16 control construction permit/PSD approval for  
17 Mississippi Lime Company for a lime manufacturing plant  
18 to be located near Prairie du Rocher. The plant will  
19 be located on the site of its existing limestone mine  
20 and will produce lime by calcination or high  
21 temperature roasting of crushed limestone in rotary  
22 kilns.

23 The Illinois EPA originally issued a permit  
24 for this proposed plan on December 30, 2010; however,  
25 that permit was appealed to USEPA and has never become

1 effective. Subsequently, USEPA remanded the permit  
2 back to Illinois EPA for consideration of certain  
3 additional manner -- matters. Since 2010 new standards  
4 and requirements have become effective and the  
5 applicant has supplemented the original application and  
6 requested certain revisions to the originally issued  
7 permit. Illinois EPA has reviewed this information and  
8 has made a preliminary determination that the applicant  
9 meets the requirements for permit issuance and has  
10 prepared a draft permit for public review and comment.

11 The plant would be a major source for  
12 emissions of sulfur dioxide (SO<sub>2</sub>), nitrogen oxides  
13 (NO<sub>x</sub>) or Nox, carbon monoxide, and particulate matter  
14 (PM, PM<sub>10</sub>, and PM<sub>2.5</sub>) as well as greenhouse gases under  
15 the federal rules for Prevention of Significant  
16 Deterioration (PSD), and those are found in 40 CFR  
17 Section 52.21.

18 The Illinois EPA is holding this hearing for  
19 the purpose of accepting comments from the public on  
20 the proposed issuance of a permit for this project  
21 prior to taking final action on the application. This  
22 public hearing is being held under the provisions of  
23 Illinois EPA's procedures for permit and closure plan  
24 hearings, which you can find at 35 Illinois  
25 Administrative Code, Part 166, Subpart A. Copies of

1 these procedures can be accessed on the website for the  
2 Illinois Pollution Control Board at  
3 [www.ipcb.state.il.us](http://www.ipcb.state.il.us), or if you do not have easy access  
4 to the internet, copies can be obtained from me on  
5 request.

6 An informational public hearing means  
7 exactly that. It is an opportunity for you to provide  
8 information to the Illinois EPA concerning this permit.  
9 This is not a contested case hearing.

10 I would like to explain how tonight's  
11 hearing is going to proceed. First, I will have the  
12 Illinois EPA staff introduce themselves and identified  
13 their responsibilities within the agency in regards to  
14 this permitting action. Following this overview, I  
15 will allow the public to provide comments.

16 You are not required to provide comments  
17 orally at this hearing. Written comments are given the  
18 same consideration and may be submitted to Illinois EPA  
19 at any time during the comment period, and that comment  
20 period runs through July 2, 2014. All comments  
21 submitted by mail must be postmarked no later than July  
22 2nd. Although we will continue to accept comments  
23 through that date, tonight is the only time that we  
24 will accept oral comments.

25 The decision date in this matter will depend

1 upon the number and nature of comments received, as  
2 well as other factors.

3 Any person who wants to make oral comments  
4 may do so as long as the statements are relevant to the  
5 issues at hand, namely the permit. If you have not  
6 signed a registration card at this point, please see  
7 Brad Frost at the registration table. He will provide  
8 you with a registration card. Please be sure to check  
9 the appropriate box on the card if you decide to make  
10 comments at this hearing. If you have lengthy  
11 comments, it may be helpful to submit them to me in  
12 writing before the end of the comment period, and I  
13 will ensure that they are included in the hearing  
14 record as an exhibit.

15 Please keep your comments and questions  
16 relevant to the permit. If your comments fall outside  
17 the scope of this hearing, I may ask you to proceed to  
18 another issue.

19 The permit applicant, Mississippi Lime  
20 Company, is also free to respond to issues if willing  
21 to do so, but I am not in a position to require them to  
22 do so. We will make an attempt to respond to issues  
23 raised, but I will not allow the speakers to argue or  
24 engage in prolonged dialogue with our hearing panel.

25 For the purpose of allowing everyone to have

1 a chance to comment, I ask that everyone keep their  
2 questions and comments to eight minutes. This should  
3 give everyone who desires to speak an opportunity.

4 In addition, I would like to stress that we  
5 want to avoid unnecessary repetition. If anyone before  
6 you has already presented testimony that is contained  
7 in your written oral comments, please skip over those  
8 issues when you speak. If someone speaking before you  
9 has already said what you desired to say, you may pass  
10 when I call your name to come forward.

11 All who complete a registration card or  
12 submit written comments in this matter will be notified  
13 of the final decision in this matter and the  
14 availability of the responsiveness summary. In the  
15 responsive summary, the Illinois EPA will respond to  
16 all significant issues that were raised at this hearing  
17 or submitted to me prior to the close of the comment  
18 period. Again, the written record in this matter will  
19 close on July 2, 2014, and I will accept written  
20 comments again as long as they are postmarked by that  
21 date.

22 While the record is open, all relevant  
23 comments and documents looked at will be placed in the  
24 hearing record as exhibits. Please send all written  
25 documents to my attention. You can send them to Dean

1 Studer, Hearing Officer, Office of Community Relations,  
2 regarding Mississippi Lime, Illinois EPA, 1021 North  
3 Grand Avenue East, PO Box 19276, Springfield, Illinois  
4 62794, dash, 9276. This address is also given on the  
5 public notice of the hearing tonight.

6 For everyone making a comment, I remind you  
7 that we have a court reporter here who is making a  
8 record of these proceedings for the purposes of our  
9 administrative record. Once I receive the transcript  
10 back from the court reporter, I will have it posted on  
11 the Agency's web page in the same area where the  
12 hearing notice and other documents in this proceeding  
13 have been posted. For the benefit of the court  
14 reporter, please keep the general background noise in  
15 the room to a minimum so that she can hear everything  
16 that is said. Also, please silence all cell phones or  
17 pagers at this time if you have not already done so.

18 People who have registered to speak will be  
19 called upon one at a time to come forward and speak.  
20 When it is your turn to speak, please come forward to  
21 the podium. Please state your name and, if applicable,  
22 any governmental body, organization, or association  
23 that you represent. If you do not represent any  
24 governmental body, organization, or association, you  
25 may simply state that you are a concerned citizen. For

1 the benefit of the court reporter, I also ask that you  
2 spell your last name. If there are alternate spellings  
3 of your first name, you may spell your first name,  
4 also. Please direct your comments to the panel and the  
5 court reporter so that we may have an accurate  
6 transcription of your comments.

7 Are there any questions of how I will  
8 conduct the hearing this evening? Okay. Let the  
9 record indicate that no one raised their hand.

10 I would now like to ask the Illinois EPA  
11 staff to introduce themselves and give a sentence  
12 regarding their role in the review of this permit  
13 application.

14 MR. ROMAINE: Good evening. My name is  
15 Chris Romaine. I'm manager of construction unit of the  
16 air permit section, and I assisted in the review of  
17 this application.

18 MR. PATEL: Good evening. My name is Minesh  
19 Patel, and I am the permit analyst with the Bureau of  
20 Air. Welcome to this evening's hearing. I am a permit  
21 engineer with the Bureau of Air. I will be giving you  
22 a brief description of the proposed project.

23 Mississippi Lime Company has requested a  
24 construction permit for a lime manufacturing plant at  
25 its existing limestone mine located north of Prairie du

1     Rocher. The proposed plant would include two rotary  
2     kilns equipped with pre-heaters, storage and handling  
3     systems for limestone, fuel, and lime, and lime  
4     hydrating systems.

5             As explained by Mr. Studer, the Illinois EPA  
6     originally issued an air pollution control permit in  
7     2010; however, that permit did not become effective.  
8     It was appealed to USEPA and returned back to the  
9     Illinois EPA for further consideration of certain  
10    matters.

11            The lime plant is subject to federal  
12    regulation for Prevention of Significant Deterioration  
13    of air quality or PSD. This is because potential  
14    emissions of nitrogen oxide, sulfur dioxide, carbon  
15    monoxide, particulate matter, and carbon dioxide or  
16    greenhouse gases would be major. Accordingly, the  
17    plant must use best available control technology or  
18    BACT to control its emissions of these pollutants.

19            For particulate emissions from the kilns,  
20    the BACT would be provided by fabric filters, which are  
21    generally considered the most effective control  
22    technology for the particulate matter emissions from  
23    kilns. Particulate matter emissions from other units  
24    including handling and storage of limestone, solid  
25    fuel, and lime handling would be provided by operating

1 practices and bag houses to prevent emissions.

2 Nitrogen oxide emissions from the kilns  
3 would be minimized by combustion management, which  
4 would reduce formation nitrogen oxide. Sulfur dioxide  
5 emissions would be controlled by natural scrubbing by  
6 limestone and lime dust in the kilns, which is then  
7 captured by the fabric filters or bag houses. For the  
8 emissions of sulfur dioxide, the new draft permit would  
9 set a lower numeric limit than the original permit but  
10 it would apply on a longer time period. Carbon  
11 monoxide emissions would be minimized with good  
12 combustion practices.

13 Further evaluations of BACT were conducted  
14 as directed by the USEPA Appeals Board. In addition,  
15 BACT was determined for greenhouse gases since  
16 greenhouse gases, mainly carbon dioxide, are now  
17 regulated under the Federal Clean Air Act.

18 For greenhouse gases, BACT would be provided  
19 by the pre-heaters, which will lower the fuel  
20 consumption of the kilns. The pre-heaters would also  
21 lower the emissions of other pollutants as they are  
22 related to fuel combustion.

23 In addition to BACT, Mississippi Lime has to  
24 perform air quality analyses to assess the potential  
25 effect of the proposed plant on ambient air quality

1 standard. For sulfur dioxide and particulate matter  
2 (PM2.5) Mississippi Lime has updated its analysis of  
3 the impacts of the proposed plant. The analyses  
4 continue to show that the plant would not threaten air  
5 quality.

6 The permit that the Illinois EPA is  
7 proposing to issue for this lime manufacturing plant  
8 will include a variety of requirements to ensure that  
9 the plant is properly constructed and operated. The  
10 proposed permit establishes appropriate testing,  
11 monitoring, recordkeeping, and reporting requirements.  
12 It also includes requirements for continuous emission  
13 monitoring for the kilns emission of sulfur dioxide,  
14 nitrogen oxides, carbon monoxide, carbon dioxide, and  
15 opacity.

16 We look forward to your questions or  
17 comments on this proposed permit, and once again thank  
18 you for attending the hearing.

19 MR. STUDER: Thank you, Mr. Patel. The  
20 first person that has requested to speak tonight is  
21 Patsie Hopkins if you could come forward. Please  
22 direct your comments into the microphone so that all  
23 can hear.

24 MR. HOPKINS: My name is Patsie,  
25 P-A-T-S-I-E, Hopkins, H-O-P-K-I-N-S. I'm here

1 representing State Representative Jerry Costello, II.  
2 Job creation is crucial to our economic development,  
3 and bringing the Mississippi Lime plant to Prairie du  
4 Rocher would be extremely beneficial to not only  
5 Prairie du Rocher but southern Illinois. It has been  
6 an honor for State Representative Costello to work with  
7 Mississippi Lime in helping them to obtain their draft  
8 air permit -- the draft permit for air pollution  
9 control. There have been additional analyses conducted  
10 over the last four years since the permit was  
11 considered in 2010. It has been concluded that the  
12 plant will not violate the national ambient air quality  
13 standards. I believe that this plant would create  
14 great economic prosperity for the 116th District. It  
15 is our responsibility to create job opportunities for  
16 Illinois residents. Thank you.

17 MR. STUDER: Thank you. The next person is  
18 Chris Martin.

19 MR. MARTIN: My name Christopher,  
20 traditional spelling, Martin, also traditional  
21 spelling. I am the economic development coordinator  
22 for Randolph County. Like what Patsie said, I just  
23 wanted to let you know that Randolph County Economic  
24 Development and the Randolph County progress committee  
25 fully support Mississippi Lime and this new plant.

1 MR. STUDER: Thank you. Raymond Cole.

2 MR. COLE: My name is Raymond Cole. I'm  
3 president of the Prairie du Rocher Village Board of  
4 Trustees. I am here tonight to let you know that the  
5 village board has reviewed their permit, and at our May  
6 5th meeting we adopted a resolution of support for  
7 this. We are comfortable that this company has gone  
8 above and beyond what is necessary to do this  
9 construction project. They have made every effort to  
10 work with the community and be active in the community.  
11 They've shown a willingness to not only meet the  
12 requirements of this permit, but we are comfortable in  
13 their conversations that they will continue as  
14 technology continues to change that they will adapt  
15 whatever is necessary to continue to work with us. I'd  
16 also to point out the products that will be produced by  
17 this facility will ultimately be used at other  
18 industrial facilities to ensure their air quality is  
19 met. We are asking that you find positive on this  
20 permit tonight.

21 MR. STUDER: Thank you, Mr. Cole. Daryl  
22 Clerc.

23 MR. CLERC: Thank you. My name is Daryl  
24 Clerc, Daryl, D-A-R-Y-L, Clerc, C-L-E-R-C. My -- I had  
25 a couple of questions. I'm not sure if you're set up

1 to answer them, but if you are, I'd appreciate it.

2 MR. STUDER: Go ahead and ask them, and  
3 we'll give it a shot.

4 MR. CLERC: Well, the first question is  
5 related to the disbursing of the stack gases. I'm  
6 curious how tall the stack is and whether or not it's  
7 on top of the bluff.

8 MR. ROMAINE: The stack is not on top of the  
9 bluff, but it extends above the level of the bluff. I  
10 don't have an exact number, but I think 250 feet  
11 roughly from ground level, which is above the bluff.

12 MR. CLERC: How tall is it?

13 MR. ROMAINE: Roughly 250 feet.

14 MR. CLERC: Okay. All right. Another  
15 question related to the extent of underground mining  
16 operations. I'm wondering what the eastern boundary is  
17 of those operations.

18 MR. ROMAINE: We don't have that  
19 information.

20 MR. CLERC: Okay. And last one was related  
21 to the traffic. Is it truck or barge or both?

22 MR. ROMAINE: The plant is being permitted  
23 to transport its product by a combination of truck,  
24 rail, and barge.

25 MR. CLERC: Okay. Do you have a relative

1 number percent for each?

2 MR. ROMAINÉ: I don't think -- we have  
3 permitted it to handle potentially all of its material  
4 on each of those.

5 MR. CLERC: The reason --

6 MR. ROMAINÉ: Now, Mississippi Lime may have  
7 projections on distribution if they want to provide.

8 MR. CLERC: Okay.

9 MR. ROMAINÉ: We don't have information on  
10 that.

11 MR. CLERC: Okay. Thank you.

12 MR. STUDER: Thank you. Is there anyone in  
13 the room that hasn't spoken that would like to make a  
14 comment on the record? Okay. Sir, if you'd come  
15 forward to the microphone and --

16 MR. GLENN: My name is Harry Glenn,  
17 H-A-R-R-Y, G-L-E-N-N, and I live approximately 300 feet  
18 from the Hollings Grove barge, river barge. And my  
19 question is what type of material is going to go to the  
20 river be hauled out by barge.

21 MR. ROMAINÉ: It would be the lime product  
22 from the plant, pebble lime.

23 MR. GLENN: Quicklime?

24 MR. ROMAINÉ: No.

25 MR. GLENN: Just regular lime?

1 MR. ROMAINÉ: Yes.

2 MR. GLENN: And how would we be protected  
3 against crosswinds?

4 MR. ROMAINÉ: You're talking about the barge  
5 loading operation?

6 MR. GLENN: How will it be brought to the  
7 barge?

8 MR. ROMAINÉ: That's conveyer, isn't it?

9 MR. PATEL: Yes.

10 MR. GLENN: Will that be truck?

11 MR. ROMAINÉ: It's planned to be enclosed --  
12 well, windshielded conveyor.

13 MR. GLENN: A conveyor?

14 MR. ROMAINÉ: Yes.

15 MR. GLENN: Will it be enclosed?

16 MR. ROMAINÉ: It will be appropriately  
17 enclosed to prevent wind blowing material off the  
18 conveyor.

19 MR. GLENN: Was that part of the original  
20 plan that they had for the conveyor belt to be going  
21 out to the river?

22 MR. PATEL: I don't recall.

23 MR. ROMAINÉ: We don't recall.

24 MR. GLENN: Are you aware of the plans that  
25 they had?

1 MR. ROMAINE: We -- we have not reviewed  
2 that aspect of the application in preparation. We can  
3 get back to you with that information.

4 MR. GLENN: I see. Thank you.

5 MR. STUDER: I also want to point out that  
6 for questions and issues that are raised at the hearing  
7 and both submitted in writing we will also be providing  
8 written responses to those in the responsiveness  
9 summary that was -- that I had talked about in my  
10 opening statement. Is there anyone else this evening  
11 that would like to make a comment on the record? Okay.  
12 If no one in the room has any additional comments, I'll  
13 go ahead and adjourn this hearing, and I remind  
14 everyone that the record will -- I'm sorry? Okay. I  
15 remind everyone the written record on this is open  
16 until July 2nd. Thank you. This hearing is adjourned.

17 (At this time the hearing was adjourned  
18 at 7:30 p.m.)  
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1 CERTIFICATE OF REPORTER

2

3 I, JOANNA CHARLTON, RPR, CCR(MO), CSR(IL),  
4 the officer before whom the foregoing hearing was  
5 taken, do hereby certify that the foregoing hearing was  
6 taken by me to the best of my ability and thereafter  
7 reduced to typewriting under my direction; that I am  
8 neither counsel for, related to, nor employed by any of  
9 the parties to the action in which this hearing was  
10 taken, and further that I am not a relative or employee  
11 of any attorney or counsel employed by the parties  
12 thereto, nor financially or otherwise interested in the  
13 outcome of the action.

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JOANNA CHARLTON,

RPR, CCR(MO), CSR(IL)

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<p><b>A</b></p> <p><b>ability</b> 18:6</p> <p><b>accept</b> 4:22,24 6:19</p> <p><b>accepting</b> 3:19</p> <p><b>access</b> 4:3</p> <p><b>accessed</b> 4:1</p> <p><b>accurate</b> 8:5</p> <p><b>Act</b> 10:17</p> <p><b>action</b> 3:21 4:14 18:9,13</p> <p><b>active</b> 13:10</p> <p><b>adapt</b> 13:14</p> <p><b>addition</b> 6:4 10:14,23</p> <p><b>additional</b> 3:3 12:9 17:12</p> <p><b>address</b> 7:4</p> <p><b>adjourn</b> 17:13</p> <p><b>adjourned</b> 17:16 17:17</p> <p><b>administrative</b> 3:25 7:9</p> <p><b>adopted</b> 13:6</p> <p><b>agency</b> 2:6 4:13</p> <p><b>Agency's</b> 7:11</p> <p><b>ahead</b> 2:4 14:2 17:13</p> <p><b>air</b> 1:3 2:15 8:16 8:20,21 9:6,13 10:17,24,25 11:4 12:8,8,12 13:18</p> <p><b>allow</b> 4:15 5:23</p> <p><b>allowing</b> 5:25</p> <p><b>alternate</b> 8:2</p> <p><b>ambient</b> 10:25 12:12</p> <p><b>analyses</b> 10:24 11:3 12:9</p> <p><b>analysis</b> 11:2</p> <p><b>analyst</b> 8:19</p> <p><b>answer</b> 14:1</p> <p><b>appealed</b> 2:25 9:8</p> <p><b>Appeals</b> 10:14</p> <p><b>applicable</b> 7:21</p>	<p><b>applicant</b> 3:5,8 5:19</p> <p><b>application</b> 3:5 3:21 8:13,17 17:2</p> <p><b>apply</b> 10:10</p> <p><b>appreciate</b> 14:1</p> <p><b>appropriate</b> 5:9 11:10</p> <p><b>appropriately</b> 16:16</p> <p><b>approval</b> 2:16</p> <p><b>approximately</b> 15:17</p> <p><b>area</b> 7:11</p> <p><b>argue</b> 5:23</p> <p><b>asking</b> 13:19</p> <p><b>aspect</b> 17:2</p> <p><b>assess</b> 10:24</p> <p><b>assisted</b> 8:16</p> <p><b>association</b> 7:22 7:24</p> <p><b>attempt</b> 5:22</p> <p><b>attending</b> 11:18</p> <p><b>attention</b> 6:25</p> <p><b>attorney</b> 18:11</p> <p><b>availability</b> 6:14</p> <p><b>available</b> 9:17</p> <p><b>Avenue</b> 7:3</p> <p><b>avoid</b> 6:5</p> <p><b>aware</b> 16:24</p> <p><b>B</b></p> <p><b>back</b> 3:2 7:10 9:8 17:3</p> <p><b>background</b> 7:14</p> <p><b>BACT</b> 9:18,20 10:13,15,18,23</p> <p><b>bag</b> 10:1,7</p> <p><b>barge</b> 14:21,24 15:18,18,20 16:4,7</p> <p><b>behalf</b> 2:7</p> <p><b>believe</b> 12:13</p> <p><b>belt</b> 16:20</p> <p><b>beneficial</b> 12:4</p> <p><b>benefit</b> 7:13 8:1</p>	<p><b>best</b> 9:17 18:6</p> <p><b>beyond</b> 13:8</p> <p><b>blowing</b> 16:17</p> <p><b>bluff</b> 14:7,9,9,11</p> <p><b>board</b> 4:2 10:14 13:3,5</p> <p><b>body</b> 7:22,24</p> <p><b>Bonnett</b> 2:7</p> <p><b>boundary</b> 14:16</p> <p><b>box</b> 5:9 7:3</p> <p><b>Brad</b> 5:7</p> <p><b>brief</b> 8:22</p> <p><b>bringing</b> 12:3</p> <p><b>brought</b> 16:6</p> <p><b>Bureau</b> 8:19,21</p> <p><b>C</b></p> <p><b>calcination</b> 2:20</p> <p><b>call</b> 6:10</p> <p><b>called</b> 7:19</p> <p><b>captured</b> 10:7</p> <p><b>carbon</b> 3:13 9:14 9:15 10:10,16 11:14,14</p> <p><b>card</b> 5:6,8,9 6:11</p> <p><b>case</b> 4:9</p> <p><b>CCR(MO)</b> 18:3 18:16</p> <p><b>cell</b> 7:16</p> <p><b>certain</b> 3:2,6 9:9</p> <p><b>CERTIFICATE</b> 18:1</p> <p><b>certify</b> 18:5</p> <p><b>CFR</b> 3:16</p> <p><b>chance</b> 6:1</p> <p><b>change</b> 13:14</p> <p><b>CHARLTON</b> 18:3,16</p> <p><b>check</b> 5:8</p> <p><b>Chris</b> 8:15 12:18</p> <p><b>Christopher</b> 12:19</p> <p><b>citizen</b> 7:25</p> <p><b>Clean</b> 10:17</p> <p><b>Clerc</b> 13:22,23 13:24,24 14:4 14:12,14,20,25</p>	<p>15:5,8,11</p> <p><b>close</b> 6:17,19</p> <p><b>closure</b> 3:23</p> <p><b>Code</b> 3:25</p> <p><b>Cole</b> 13:1,2,2,21</p> <p><b>combination</b> 14:23</p> <p><b>combustion</b> 10:3 10:12,22</p> <p><b>come</b> 6:10 7:19 7:20 11:21 15:14</p> <p><b>comfortable</b> 13:7 13:12</p> <p><b>comment</b> 3:10 4:19,19 5:12 6:1,17 7:6 15:14 17:11</p> <p><b>comments</b> 3:19 4:15,16,17,20 4:22,24 5:1,3 5:10,11,15,16 6:2,7,12,20,23 8:4,6 11:17,22 17:12</p> <p><b>committee</b> 12:24</p> <p><b>community</b> 7:1 13:10,10</p> <p><b>company</b> 1:2 2:17 5:20 8:23 13:7</p> <p><b>complete</b> 6:11</p> <p><b>concerned</b> 7:25</p> <p><b>concerning</b> 4:8</p> <p><b>concluded</b> 12:11</p> <p><b>conduct</b> 8:8</p> <p><b>conducted</b> 2:10 10:13 12:9</p> <p><b>consideration</b> 3:2 4:18 9:9</p> <p><b>considered</b> 9:21 12:11</p> <p><b>constructed</b> 11:9</p> <p><b>construction</b> 1:3 2:16 8:15,24 13:9</p> <p><b>consumption</b></p>	<p>10:20</p> <p><b>contained</b> 6:6</p> <p><b>contested</b> 4:9</p> <p><b>continue</b> 4:22 11:4 13:13,15</p> <p><b>continues</b> 13:14</p> <p><b>continuous</b> 11:12</p> <p><b>control</b> 1:3 2:16 4:2 9:6,17,18 9:21 12:9</p> <p><b>controlled</b> 10:5</p> <p><b>conversations</b> 13:13</p> <p><b>conveyer</b> 16:8</p> <p><b>conveyor</b> 16:12 16:13,18,20</p> <p><b>coordinator</b> 12:21</p> <p><b>copies</b> 3:25 4:4</p> <p><b>Costello</b> 12:1,6</p> <p><b>counsel</b> 18:8,11</p> <p><b>County</b> 12:22,23 12:24</p> <p><b>couple</b> 13:25</p> <p><b>court</b> 7:7,10,13 8:1,5</p> <p><b>create</b> 12:13,15</p> <p><b>creation</b> 12:2</p> <p><b>crosswinds</b> 16:3</p> <p><b>crucial</b> 12:2</p> <p><b>crushed</b> 2:21</p> <p><b>CSR(IL)</b> 18:3,16</p> <p><b>curious</b> 14:6</p> <p><b>C-L-E-R-C</b> 13:24</p> <p><b>D</b></p> <p><b>Daryl</b> 13:21,23 13:24</p> <p><b>dash</b> 7:4</p> <p><b>date</b> 4:23,25 6:21</p> <p><b>Dean</b> 2:5 6:25</p> <p><b>December</b> 2:24</p> <p><b>decide</b> 5:9</p> <p><b>decision</b> 4:25 6:13</p> <p><b>defer</b> 2:12</p>
--	---	--	---	--

<b>depend</b> 4:25 <b>description</b> 8:22 <b>desired</b> 6:9 <b>desires</b> 6:3 <b>Deterioration</b> 3:16 9:12 <b>determination</b> 3:8 <b>determined</b> 10:15 <b>development</b> 12:2,21,24 <b>dialogue</b> 5:24 <b>dioxide</b> 3:12 9:14 9:15 10:4,8,16 11:1,13,14 <b>direct</b> 8:4 11:22 <b>directed</b> 10:14 <b>direction</b> 18:7 <b>Director</b> 2:7 <b>disbursing</b> 14:5 <b>distribution</b> 15:7 <b>District</b> 12:14 <b>documents</b> 6:23 6:25 7:12 <b>draft</b> 3:10 10:8 12:7,8 <b>du</b> 1:7,8 2:18 8:25 12:3,5 13:3 <b>dust</b> 10:6 <b>D-A-R-Y-L</b> 13:24	1:7 <b>emission</b> 11:12 11:13 <b>emissions</b> 3:12 9:14,18,19,22 9:23 10:1,2,5,8 10:11,21 <b>employed</b> 18:8 18:11 <b>employee</b> 18:10 <b>enclosed</b> 16:11 16:15,17 <b>engage</b> 5:24 <b>engineer</b> 8:21 <b>ensure</b> 2:8 5:13 11:8 13:18 <b>Environmental</b> 2:6 <b>EPA</b> 2:15,23 3:2 3:7,18 4:8,12 4:18 6:15 7:2 8:10 9:5,9 11:6 <b>EPA's</b> 3:23 <b>equipped</b> 9:2 <b>establishes</b> 11:10 <b>evaluations</b> 10:13 <b>evening</b> 2:4 8:8 8:14,18 17:10 <b>evening's</b> 8:20 <b>exact</b> 14:10 <b>exactly</b> 4:7 <b>exhibit</b> 5:14 <b>exhibits</b> 6:24 <b>existing</b> 2:19 8:25 <b>explain</b> 4:10 <b>explained</b> 9:5 <b>extends</b> 14:9 <b>extent</b> 14:15 <b>extremely</b> 12:4	<b>fair</b> 2:10 <b>fall</b> 5:16 <b>federal</b> 3:15 9:11 10:17 <b>feet</b> 14:10,13 15:17 <b>filters</b> 9:20 10:7 <b>final</b> 3:21 6:13 <b>financially</b> 18:12 <b>find</b> 3:24 13:19 <b>first</b> 4:11 8:3,3 11:20 14:4 <b>Following</b> 4:14 <b>foregoing</b> 18:4,5 <b>formation</b> 10:4 <b>forward</b> 6:10 7:19,20 11:16 11:21 15:15 <b>found</b> 3:16 <b>four</b> 12:10 <b>free</b> 5:20 <b>Frost</b> 5:7 <b>fuel</b> 9:3,25 10:19 10:22 <b>fully</b> 12:25 <b>further</b> 9:9 10:13 18:10	10:11 <b>governmental</b> 7:22,24 <b>Grand</b> 7:3 <b>great</b> 12:14 <b>greenhouse</b> 3:14 9:16 10:15,16 10:18 <b>ground</b> 14:11 <b>Grove</b> 15:18 <b>G-L-E-N-N</b> 15:17	<b>I</b> <b>identified</b> 4:12 <b>II</b> 12:1 <b>Illinois</b> 1:8 2:6,15 2:23 3:2,7,18 3:23,24 4:2,8 4:12,18 6:15 7:2,3 8:10 9:5,9 11:6 12:5,16 <b>impacts</b> 11:3 <b>include</b> 9:1 11:8 <b>included</b> 5:13 <b>includes</b> 11:12 <b>including</b> 9:24 <b>indicate</b> 8:9 <b>industrial</b> 13:18 <b>information</b> 3:7 4:8 14:19 15:9 17:3 <b>informational</b> 2:14 4:6 <b>interested</b> 18:12 <b>internet</b> 4:4 <b>introduce</b> 4:12 8:11 <b>issuance</b> 3:9,20 <b>issue</b> 5:18 11:7 <b>issued</b> 2:23 3:6 9:6 <b>issues</b> 2:11,12 5:5 5:20,22 6:8,16 17:6
<b>E</b> <b>East</b> 7:3 <b>eastern</b> 14:16 <b>easy</b> 4:3 <b>economic</b> 12:2,14 12:21,23 <b>effect</b> 10:25 <b>effective</b> 3:1,4 9:7,21 <b>efficient</b> 2:10 <b>effort</b> 13:9 <b>eight</b> 6:2 <b>ELEMENTARY</b>	<b>F</b> <b>fabric</b> 9:20 10:7 <b>facilities</b> 13:18 <b>facility</b> 13:17 <b>factors</b> 5:2	<b>G</b> <b>gases</b> 3:14 9:16 10:15,16,18 14:5 <b>general</b> 7:14 <b>generally</b> 9:21 <b>give</b> 6:3 8:11 14:3 <b>given</b> 4:17 7:4 <b>giving</b> 8:21 <b>Glenn</b> 15:16,16 15:23,25 16:2,6 16:10,13,15,19 16:24 17:4 <b>go</b> 2:4,4 14:2 15:19 17:13 <b>going</b> 4:11 15:19 16:20 <b>good</b> 2:4 8:14,18	<b>H</b> <b>hand</b> 5:5 8:9 <b>handle</b> 15:3 <b>handling</b> 9:2,24 9:25 <b>Harry</b> 15:16 <b>hailed</b> 15:20 <b>hear</b> 7:15 11:23 <b>hearing</b> 1:6,14 2:5,8,14 3:18 3:22 4:6,9,11 4:17 5:10,13,17 5:24 6:16,24 7:1,5,12 8:8,20 11:18 17:6,13 17:16,17 18:4,5 18:9 <b>hearings</b> 3:24 <b>held</b> 1:6 3:22 <b>helpful</b> 5:11 <b>helping</b> 12:7 <b>high</b> 2:20 <b>holding</b> 3:18 <b>Hollings</b> 15:18 <b>honor</b> 12:6 <b>Hopkins</b> 11:21 11:24,25 <b>houses</b> 10:1,7 <b>hydrating</b> 9:4 <b>H-A-R-R-Y</b> 15:17 <b>H-O-P-K-I-N-S</b> 11:25	<b>J</b> <b>Jerry</b> 12:1 <b>JOANNA</b> 18:3 18:16 <b>job</b> 12:2,15 <b>July</b> 4:20,21 6:19 17:16 <b>JUNE</b> 1:8
				<b>K</b> <b>keep</b> 5:15 6:1 7:14 <b>kilns</b> 2:22 9:2,19 9:23 10:2,6,20

11:13 <b>know</b> 12:23 13:4	<b>means</b> 4:6 <b>meet</b> 13:11 <b>meeting</b> 13:6 <b>meets</b> 3:9 <b>met</b> 13:19 <b>microphone</b> 11:22 15:15 <b>MIDDLE</b> 1:7 <b>mine</b> 2:19 8:25 <b>Minesh</b> 8:18 <b>minimized</b> 10:3 10:11 <b>minimum</b> 7:15 <b>mining</b> 14:15 <b>minutes</b> 6:2 <b>Mississippi</b> 1:2 2:17 5:19 7:2 8:23 10:23 11:2 12:3,7,25 15:6 <b>monitoring</b> 11:11,13 <b>monoxide</b> 3:13 9:15 10:11 11:14	<b>notified</b> 6:12 <b>Nox</b> 3:13,13 <b>number</b> 5:1 14:10 15:1 <b>numeric</b> 10:9	<b>panel</b> 5:24 8:4 <b>part</b> 3:25 16:19 <b>particulate</b> 3:13 9:15,19,22,23 11:1 <b>parties</b> 18:9,11 <b>pass</b> 6:9 <b>Patel</b> 8:18,19 11:19 16:9,22 <b>Patsie</b> 11:21,24 12:22 <b>pebble</b> 15:22 <b>People</b> 7:18 <b>percent</b> 15:1 <b>perform</b> 10:24 <b>period</b> 4:19,20 5:12 6:18 10:10 <b>permit</b> 1:3 2:12 2:23,25 3:1,7,9 3:10,20,23 4:8 5:5,16,19 8:12 8:16,19,20,24 9:6,7 10:8,9 11:6,10,17 12:8 12:8,10 13:5,12 13:20 <b>permitted</b> 14:22 15:3 <b>permitting</b> 4:14 <b>permit/PSD</b> 2:16 <b>person</b> 5:3 11:20 12:17 <b>Personally</b> 2:11 <b>phones</b> 7:16 <b>placed</b> 6:23 <b>plan</b> 2:24 3:23 16:20 <b>planned</b> 16:11 <b>plans</b> 16:24 <b>plant</b> 2:17,18 3:11 8:24 9:1 9:11,17 10:25 11:3,4,7,9 12:3 12:12,13,25 14:22 15:22 <b>please</b> 5:6,8,15 6:7,24 7:14,16	7:20,21 8:4 11:21 <b>PM</b> 3:14 <b>PM10</b> 3:14 <b>PM2.5</b> 3:14 11:2 <b>PO</b> 7:3 <b>podium</b> 7:21 <b>point</b> 5:6 13:16 17:5 <b>pollutants</b> 9:18 10:21 <b>pollution</b> 1:3 2:15 4:2 9:6 12:8 <b>position</b> 5:21 <b>positive</b> 13:19 <b>posted</b> 7:10,13 <b>postmarked</b> 4:21 6:20 <b>potential</b> 9:13 10:24 <b>potentially</b> 15:3 <b>practices</b> 10:1,12 <b>Prairie</b> 1:7,8 2:18 8:25 12:3 12:5 13:3 <b>preliminary</b> 3:8 <b>preparation</b> 17:2 <b>prepared</b> 3:10 <b>presented</b> 6:6 <b>president</b> 13:3 <b>prevent</b> 10:1 16:17 <b>Prevention</b> 3:15 9:12 <b>pre-heaters</b> 9:2 10:19,20 <b>prior</b> 3:21 6:17 <b>procedures</b> 3:23 4:1 <b>proceed</b> 4:11 5:17 <b>proceeding</b> 2:9 7:12 <b>proceedings</b> 2:1 7:8 <b>produce</b> 2:20
<b>L</b> <b>lengthy</b> 5:10 <b>let's</b> 2:4 <b>level</b> 14:9,11 <b>lime</b> 1:2 2:17,17 2:20 5:19 7:2 8:23,24 9:3,3 9:11,25 10:6,23 11:2,7 12:3,7 12:25 15:6,21 15:22,25 <b>limestone</b> 2:19 2:21 8:25 9:3 9:24 10:6 <b>limit</b> 10:9 <b>Lisa</b> 2:7 <b>live</b> 15:17 <b>loading</b> 16:5 <b>located</b> 2:18,19 8:25 <b>long</b> 5:4 6:20 <b>longer</b> 10:10 <b>look</b> 11:16 <b>looked</b> 6:23 <b>lower</b> 10:9,19,21	<b>N</b> <b>name</b> 2:5 6:10 7:21 8:2,3,3,14 8:18 11:24 12:19 13:2,23 15:16 <b>national</b> 12:12 <b>natural</b> 10:5 <b>nature</b> 5:1 <b>near</b> 2:18 <b>necessary</b> 13:8 13:15 <b>neither</b> 18:8 <b>never</b> 2:25 <b>new</b> 2:15 3:3 10:8 12:25 <b>nitrogen</b> 3:12 9:14 10:2,4 11:14 <b>noise</b> 7:14 <b>north</b> 7:2 8:25 <b>notice</b> 7:5,12	<b>O</b> <b>obtain</b> 12:7 <b>obtained</b> 4:4 <b>Office</b> 7:1 <b>officer</b> 2:5 7:1 18:4 <b>Okay</b> 8:8 14:14 14:20,25 15:8 15:11,14 17:11 17:14 <b>once</b> 7:9 11:17 <b>opacity</b> 11:15 <b>open</b> 6:22 17:15 <b>opening</b> 17:10 <b>operated</b> 11:9 <b>operating</b> 9:25 <b>operation</b> 16:5 <b>operations</b> 14:16 14:17 <b>opportunities</b> 12:15 <b>opportunity</b> 4:7 6:3 <b>oral</b> 4:24 5:3 6:7 <b>orally</b> 4:17 <b>organization</b> 7:22,24 <b>original</b> 3:5 10:9 16:19 <b>originally</b> 2:23 3:6 9:6 <b>outcome</b> 18:13 <b>outside</b> 5:16 <b>overview</b> 4:14 <b>oxide</b> 9:14 10:2,4 <b>oxides</b> 3:12 11:14 <b>o'clock</b> 2:3	<b>P</b> <b>page</b> 7:11 <b>papers</b> 7:17	
<b>M</b> <b>mail</b> 4:21 <b>major</b> 3:11 9:16 <b>making</b> 7:6,7 <b>management</b> 10:3 <b>manager</b> 8:15 <b>manner</b> 2:10 3:3 <b>manufacturing</b> 2:17 8:24 11:7 <b>Martin</b> 12:18,19 12:20 <b>material</b> 15:3,19 16:17 <b>matter</b> 2:15 3:13 4:25 6:12,13,18 9:15,22,23 11:1 <b>matters</b> 3:3 9:10				

<p><b>produced</b> 13:16  <b>product</b> 14:23  15:21  <b>products</b> 13:16  <b>progress</b> 12:24  <b>project</b> 3:20 8:22  13:9  <b>projections</b> 15:7  <b>prolonged</b> 5:24  <b>properly</b> 2:9 11:9  <b>proposed</b> 2:24  3:20 8:22 9:1  10:25 11:3,10  11:17  <b>proposing</b> 11:7  <b>prosperity</b> 12:14  <b>protected</b> 16:2  <b>Protection</b> 2:6  <b>provide</b> 4:7,15  4:16 5:7 15:7  <b>provided</b> 9:20,25  10:18  <b>providing</b> 17:7  <b>provisions</b> 3:22  <b>PSD</b> 3:16 9:13  <b>public</b> 3:10,19,22  4:6,15 7:5  <b>purpose</b> 2:8 3:19  5:25  <b>purposes</b> 7:8  <b>P-A-T-S-I-E</b>  11:25  <b>p.m</b> 1:14 17:18</p> <hr/> <p><b>Q</b></p> <p><b>quality</b> 9:13  10:24,25 11:5  12:12 13:18  <b>question</b> 14:4,15  15:19  <b>questions</b> 5:15  6:2 8:7 11:16  13:25 17:6  <b>Quicklime</b> 15:23</p> <hr/> <p><b>R</b></p> <p><b>rail</b> 14:24</p>	<p><b>raised</b> 5:23 6:16  8:9 17:6  <b>Randolph</b> 12:22  12:23,24  <b>Raymond</b> 13:1,2  <b>reason</b> 15:5  <b>recall</b> 16:22,23  <b>receive</b> 7:9  <b>received</b> 5:1  <b>record</b> 2:4 5:14  6:18,22,24 7:8  7:9 8:9 15:14  17:11,14,15  <b>recordkeeping</b>  11:11  <b>reduce</b> 10:4  <b>reduced</b> 18:7  <b>regarding</b> 7:2  8:12  <b>regards</b> 4:13  <b>registered</b> 7:18  <b>registration</b> 5:6,7  5:8 6:11  <b>regular</b> 15:25  <b>regulated</b> 10:17  <b>regulation</b> 9:12  <b>related</b> 2:12  10:22 14:5,15  14:20 18:8  <b>Relations</b> 7:1  <b>relative</b> 14:25  18:10  <b>relevant</b> 5:4,16  6:22  <b>remanded</b> 3:1  <b>remind</b> 7:6 17:13  17:15  <b>repetition</b> 6:5  <b>reporter</b> 7:7,10  7:14 8:1,5 18:1  <b>reporting</b> 11:11  <b>represent</b> 7:23  7:23  <b>Representative</b>  12:1,6  <b>representing</b>  12:1</p>	<p><b>request</b> 4:5  <b>requested</b> 3:6  8:23 11:20  <b>require</b> 5:21  <b>required</b> 4:16  <b>requirements</b> 3:4  3:9 11:8,11,12  13:12  <b>residents</b> 12:16  <b>resolution</b> 13:6  <b>respond</b> 5:20,22  6:15  <b>responding</b> 2:11  <b>responses</b> 17:8  <b>responsibilities</b>  4:13  <b>responsibility</b>  12:15  <b>responsive</b> 6:15  <b>responsiveness</b>  6:14 17:8  <b>returned</b> 9:8  <b>review</b> 3:10 8:12  8:16  <b>reviewed</b> 3:7  13:5 17:1  <b>revisions</b> 3:6  <b>right</b> 2:3 14:14  <b>river</b> 15:18,20  16:21  <b>roasting</b> 2:21  <b>Rocher</b> 1:7,8  2:18 9:1 12:4,5  13:3  <b>role</b> 8:12  <b>Romaine</b> 8:14,15  14:8,13,18,22  15:2,6,9,21,24  16:1,4,8,11,14  16:16,23 17:1  <b>room</b> 7:15 15:13  17:12  <b>rotary</b> 2:21 9:1  <b>roughly</b> 14:11,13  <b>RPR</b> 18:3,16  <b>rules</b> 2:10 3:15  <b>runs</b> 2:9 4:20</p>	<hr/> <p><b>S</b></p> <p><b>SCHOOL</b> 1:7  <b>scope</b> 5:17  <b>scrubbing</b> 10:5  <b>section</b> 3:17 8:16  <b>see</b> 5:6 17:4  <b>send</b> 6:24,25  <b>sentence</b> 8:11  <b>set</b> 10:9 13:25  <b>shot</b> 14:3  <b>show</b> 11:4  <b>shown</b> 13:11  <b>signed</b> 5:6  <b>significant</b> 3:15  6:16 9:12  <b>silence</b> 7:16  <b>simply</b> 7:25  <b>Sir</b> 15:14  <b>site</b> 2:19  <b>skip</b> 6:7  <b>solid</b> 9:24  <b>sorry</b> 17:14  <b>source</b> 3:11  <b>southern</b> 12:5  <b>SO2</b> 3:12  <b>speak</b> 6:3,8 7:18  7:19,20 11:20  <b>speakers</b> 5:23  <b>speaking</b> 6:8  <b>specific</b> 2:11  <b>spell</b> 8:2,3  <b>spelling</b> 12:20,21  <b>spellings</b> 8:2  <b>spoken</b> 15:13  <b>Springfield</b> 7:3  <b>stack</b> 14:5,6,8  <b>staff</b> 2:13 4:12  8:11  <b>standard</b> 11:1  <b>standards</b> 3:3  12:13  <b>Starting</b> 1:14  <b>state</b> 7:21,25  12:1,6  <b>statement</b> 17:10  <b>statements</b> 5:4  <b>storage</b> 9:2,24</p>	<p><b>STREET</b> 1:7  <b>stress</b> 6:4  <b>Studer</b> 2:3,5 7:1  9:5 11:19 12:17  13:1,21 14:2  15:12 17:5  <b>subject</b> 9:11  <b>submit</b> 5:11 6:12  <b>submitted</b> 4:18  4:21 6:17 17:7  <b>Subpart</b> 3:25  <b>Subsequently</b> 3:1  <b>sulfur</b> 3:12 9:14  10:4,8 11:1,13  <b>summary</b> 6:14  6:15 17:9  <b>supplemented</b>  3:5  <b>support</b> 12:25  13:6  <b>sure</b> 5:8 13:25  <b>systems</b> 9:3,4</p> <hr/> <p><b>T</b></p> <p><b>table</b> 5:7  <b>taken</b> 18:5,6,10  <b>talked</b> 17:9  <b>talking</b> 16:4  <b>tall</b> 14:6,12  <b>technical</b> 2:13  <b>technology</b> 9:17  9:22 13:14  <b>temperature</b>  2:21  <b>testimony</b> 6:6  <b>testing</b> 11:10  <b>thank</b> 11:17,19  12:16,17 13:1  13:21,23 15:11  15:12 17:4,16  <b>thereto</b> 18:12  <b>think</b> 14:10 15:2  <b>threaten</b> 11:4  <b>time</b> 1:14 4:19,23  7:17,19 10:10  17:17  <b>tonight</b> 2:8 4:23</p>
---	---	--	--	--

7:5 11:20 13:4 13:20 <b>tonight's</b> 2:8 4:10 <b>top</b> 14:7,8 <b>traditional</b> 12:20 12:20 <b>traffic</b> 14:21 <b>transcript</b> 2:1 7:9 <b>transcription</b> 8:6 <b>transport</b> 14:23 <b>truck</b> 14:21,23 16:10 <b>Trustees</b> 13:4 <b>turn</b> 7:20 <b>two</b> 9:1 <b>type</b> 15:19 <b>typewriting</b> 18:7	<b>willingness</b> 13:11 <b>wind</b> 16:17 <b>windshielded</b> 16:12 <b>wondering</b> 14:16 <b>work</b> 12:6 13:10 13:15 <b>writing</b> 5:12 17:7 <b>written</b> 4:17 6:7 6:12,18,19,24 17:8,15 <b>www.ipcb.stat...</b> 4:3	<b>7</b> 2:3 <b>7:00</b> 1:14 <b>7:30</b> 17:18 <b>714</b> 1:7		
<hr/> <b>U</b> <hr/>	<hr/> <b>Y</b> <hr/>	<hr/> <b>9</b> <hr/>		
<b>ultimately</b> 13:17 <b>underground</b> 14:15 <b>unit</b> 8:15 <b>units</b> 9:23 <b>unnecessary</b> 6:5 <b>updated</b> 11:2 <b>use</b> 9:17 <b>USEPA</b> 2:25 3:1 9:8 10:14	<b>years</b> 12:10 <hr/> <b>1</b> <hr/>	<b>9276</b> 7:4		
<hr/> <b>V</b> <hr/>	<b>1021</b> 7:2 <b>116th</b> 12:14 <b>166</b> 3:25 <b>19276</b> 7:3 <hr/> <b>2</b> <hr/>			
<b>variety</b> 11:8 <b>village</b> 13:3,5 <b>violate</b> 12:12	<b>2</b> 1:8 4:20 6:19 <b>2nd</b> 4:22 17:16 <b>2010</b> 2:24 3:3 9:7 12:11 <b>2014</b> 1:8 4:20 6:19 <b>250</b> 14:10,13 <hr/> <b>3</b> <hr/>			
<hr/> <b>W</b> <hr/>	<b>30</b> 2:24 <b>300</b> 15:17 <b>35</b> 3:24 <hr/> <b>4</b> <hr/>			
<b>want</b> 6:5 15:7 17:5 <b>wanted</b> 12:23 <b>wants</b> 5:3 <b>web</b> 7:11 <b>website</b> 4:1 <b>welcome</b> 2:7 8:20 <b>we'll</b> 14:3 <b>willing</b> 5:20	<b>40</b> 3:16 <hr/> <b>5</b> <hr/>			
	<b>5th</b> 13:6 <b>52.21</b> 3:17 <hr/> <b>6</b> <hr/>			
	<b>62794</b> 7:4 <hr/> <b>7</b> <hr/>			