

**MINNESOTA POLLUTION CONTROL AGENCY**  
**BEFORE THE OFFICE OF ADMINISTRATIVE HEARINGS**  
**OF THE STATE OF MINNESOTA**

**In the Matter of the**  
**Air Toxics Emissions Reporting Rule Hearing**

**OAH DOCKET NO. 71-9003-39354**

**Revisor Number R-4599**

**Held virtually by WebEx**  
**February 27, 2025**  
**3:00 p.m. to 6:00 p.m.**

**BEFORE:**  
**Office of Administrative Hearings**  
**Judge Jessica Palmer-Denig**

**STENOGRAPHIC COURT REPORTER:**  
**Janet Shaddix Elling, RPR**

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1                   WHEREUPON, the following proceedings were  
2                   duly had and entered of record, to wit:

3                   JUDGE PALMER-DENIG: Good afternoon.

4                   I'm Administrative Law Judge Jessica  
5                   Palmer-Denig and I want to welcome all of you today.

6                   I know that we just started right on the  
7                   minute at 3:00, so some folks are going to be  
8                   joining over the next couple of minutes, but I want  
9                   to thank all of you who are here and those of you  
10                  who are joining for taking the time to participate  
11                  in today's rulemaking process.

12                  Today is February 27th of 2025 and it is  
13                  3:00 p.m. We're here for a public hearing In the  
14                  Matter of the Minnesota Pollution Control Agency's  
15                  Amendments to Rules Governing Air Quality Air Toxics  
16                  Emissions Reporting Rule.

17                  And I'm going to ask to go to the next  
18                  slide.

19                  I hope everyone has got the information  
20                  about how to log in. Here we go.

21                  This is Revisor Number R-4599, and OAH,  
22                  or Office of Administrative Hearings Docket Number  
23                  71-9003-39354. And that number is really important.  
24                  71-9003-39354. You're definitely going to want to  
25                  know the last five digits of that number because

1 that is going to help you navigate the eComments  
2 website if you also would like to make a eComment.  
3 That number should also be referenced if you submit  
4 comments in other ways to our office, such as by fax  
5 or by U.S. Mail. So make sure you make a note,  
6 39354.

7 If I could have the next slide, please.

8 All right. So here's a little bit of a  
9 road map for where we're going to go today. I'm  
10 just going to make some preliminary remarks, and  
11 then I'm going to turn the day over to the folks  
12 from the Minnesota Pollution Control Agency to  
13 introduce themselves. And then they're going to  
14 make a presentation about their exhibits and about  
15 the rulemaking. Then after that is done we will  
16 take a brief break and then we will get into public  
17 comments and questions. So a little bit from me,  
18 quite a bit from the agency, and then public  
19 comments and questions.

20 Next slide, please.

21 And as I said before for those of you  
22 just joining, I am Jessica Palmer-Denig, I'm an  
23 Administrative Law Judge at the State Office of  
24 Administrative Hearings, and I use she/her pronouns.  
25 And I encourage any participants to let me know

1 about their pronouns, or if you have a preferred  
2 form of address that you would like to share with  
3 me, I'm happy to hear that from you.

4 I'll note that the Office of  
5 Administrative Hearings is an independent agency of  
6 the State of Minnesota. We are independent of the  
7 Pollution Control Agency and any group or individual  
8 who's involved with this hearing. The role of our  
9 office is to provide hearings that are fair and  
10 neutral as to all participants.

11 And the purpose of this hearing today is  
12 to allow the agency to present its case regarding  
13 its proposed rules and to hear from the public about  
14 its proposal.

15 Next slide, please.

16 Public participation is really important  
17 and so I want to tell you how excited I am to see so  
18 many people who have joined the rulemaking hearing  
19 today. Some of you are here because you want to  
20 make public comments, some of you are here as  
21 observers, I want to welcome everyone regardless of  
22 what role you want to play today.

23 Having input from the public is  
24 absolutely essential to the development of public  
25 policy in Minnesota. And the rule hearing that

1 we're going to have is set up so that we can  
2 maximize public comment.

3 I am here to ensure procedural fairness.  
4 I'm here to ensure that everyone is courteous and  
5 that we run the hearing in an effective and an  
6 efficient manner so that as many parties as possible  
7 can be heard. And my goal is to draw out knowledge  
8 and perspectives from as many people as possible.  
9 We do really rely on the wisdom of the public and on  
10 the perspective that the public offers to officials  
11 in government who are making decisions about very  
12 important issues. So I want to thank everyone for  
13 being here today to learn about the rule and to  
14 share your thoughts and expertise and experience  
15 with us.

16 Next slide, please.

17 All right. So let's talk a little bit  
18 about the parameters of how a rulemaking hearing  
19 works and how the Office of Administrative Hearings  
20 role in a rulemaking works.

21 This rulemaking is part of a -- is done  
22 under a set of rules under the Minnesota  
23 Procedures -- Administrative Procedures Act. So  
24 during this rulemaking proceeding there are really  
25 three things that the agency is going to be

1 addressing.

2 One, the agency needs to document that it  
3 has the authority to adopt the rules that it's  
4 proposing. Second, the agency needs to demonstrate  
5 that it has fulfilled all of the relevant legal  
6 requirements of law and rule. And then it also  
7 needs to demonstrate the need for and reasonableness  
8 of each portion of the proposed rules with an  
9 affirmative presentation of facts. So the  
10 rulemaking is really designed to address those  
11 issues. Does the agency have legal authority? Has  
12 everything gone appropriately, all the procedural  
13 and legal rules have been followed, and has the  
14 agency established that the rule is needed and  
15 reasonable to address whatever the problem the  
16 agency is seeking to solve.

17 I know some of you may have perspective  
18 that you want to share that falls outside of the  
19 sort of parameters of those three things. That is  
20 definitely also helpful.

21 So my role is related to these three  
22 items, but the agency has broader authority to  
23 consider the policy choices that it's making and to  
24 consider the perspectives that you're going to  
25 offer. It is very important for the department to

1 receive feedback from the public as to the content  
2 of the rules as to their scope as well as to the  
3 briefing that I'm going to be looking at.

4 I think it is important to note, though,  
5 that my job is not to rewrite the rules. The  
6 legislature delegates authority to an administrative  
7 agency to engage in rulemaking. And it comes to OAH  
8 and we review it very carefully to determine whether  
9 or not everything has been done correctly, but we  
10 don't substitute our policy judgment for that of the  
11 agency. So it's important to note that as the judge  
12 I'm not a policy maker and I'm not here to -- I'm  
13 here to review the rules and determine whether there  
14 are any defects in them, but I'm not here to  
15 establish policy for the agency and so that's a  
16 difference in the authority that I have versus what  
17 the agency has.

18 Next slide, please.

19 So there are a number of different ways  
20 to comment. And I talked just a minute ago about  
21 how the agency will make an affirmative presentation  
22 of facts and the agency is going to make its  
23 presentation. All of that comes into the record of  
24 the case and then all of your comments come into the  
25 record as well.

1 I note we have a court reporter here to  
2 record your comments and that court reporter's  
3 transcript will be the official record of this  
4 proceeding. But there are also other ways to  
5 comment. Among those, so you can offer oral  
6 comments at this hearing, you can offer written  
7 comments electronically, by email or by fax, and  
8 electronically, that's through our eComments portal  
9 on our website, by U.S. mail to the Office of  
10 Administrative Hearings, or by fax, the fax number  
11 is 651-539-0310. Again, 651-539-0310.

12 I will note that it is important to get  
13 the best record that we can get here and that's why  
14 we have a court reporter on the line. Because we  
15 have a court reporter it is important to speak  
16 slowly and clearly. This is something I'll tell you  
17 that I struggle with and so I'm working hard to  
18 speak slowly and clearly myself so that the court  
19 reporter can get everything down.

20 We also will be taking breaks from time  
21 to time to ensure that the court reporter has a  
22 break, so just be aware of that, too.

23 All right. Next slide, please.

24 So I will note that among the different  
25 ways that you can make comments, there is a

1 preference -- and I'm seeing -- is it possible to  
2 get the URL for comments placed in the comments? I  
3 would ask, and is it possible for the PCA to put  
4 that into the chat, the rulemaking website for where  
5 you submit eComments. That's a very good idea and I  
6 appreciate that.

7 So it's OAH's website, mn.gov/oah, and  
8 then media and rulemaking, and there are  
9 step-by-step instructions there for how you file an  
10 eComment. While we do accept comments in other  
11 ways, the world has sort of moved into an electronic  
12 place. And so the eComments has become the  
13 preferred method.

14 I do want to note that there is no --  
15 while a certain format may be useful to many people,  
16 we absolutely do accept comments in other ways, and  
17 I'll note this a couple of times during this  
18 proceeding. Comments are not given more weight  
19 because they come in in a particular way. Every  
20 comment is reviewed and is given equal weight  
21 regardless of how that comment is received by our  
22 office.

23 Okay. Next slide, please.

24 So this is just a little bit of an early  
25 roadmap for how we're going to do comments, and we

1 will provide this information again as we get ready  
2 to go for the comments. But if you are here by  
3 WebEx, you can click on the chat, which is where  
4 you're going to put your information, put your first  
5 and last name into the chat. That will go to agency  
6 staff who are going to create a queue of speakers.  
7 And we will queue up those speakers in the order  
8 that they are received. So if you want to speak,  
9 put your first and last names into the chat and they  
10 will start creating the queue.

11 If you are here by phone, and it did look  
12 to me that we had some folks who were here by phone.  
13 You're going to press \*3 on your keypad to raise  
14 your hand. So \*3 to raise it and then eventually  
15 you're going to press \*3 to lower it as well. So \*3  
16 raises your hand, let's us know that you're  
17 interested in making a comment. And then the WebEx  
18 operator puts you in a queue in the order that that  
19 is received, and I will have the first 6:00 digits  
20 of your phone number. So I will work on that and we  
21 will unmute you so that you will be able to make  
22 your comments. And I'm hoping that without the last  
23 four digits we can do this smoothly, and I don't see  
24 very many people who are here by phone so I'm hoping  
25 that that works. And then everyone is going to

1 state and spell their first and last name before  
2 commenting, and I will remind you to do that before  
3 your comment comes in.

4 All right. Next slide, please.

5 All right. And then if you are here by  
6 WebEx, we'd also like to be able to see you when you  
7 make your comment. It would helpful if you could  
8 turn on your video by clicking the video icon.

9 I am going to impose an initial limit of  
10 five minutes for the comments. And I do run a  
11 little timer and I try not to interrupt too much,  
12 but if you're getting close to the five-minute mark,  
13 I'm going to let you know that and that you need to  
14 wrap it up. What we will do is, if we have enough  
15 time and people would like to speak again, we will  
16 circle back into the queue if you raise your hand  
17 again. And I will let you know, once we get through  
18 all of the comments, I will invite people who have  
19 not made a comment yet to join the queue, and then I  
20 will also, after that, invite people who have  
21 already spoken but who would like to speak again to  
22 come into the queue again. Our goal is to hear from  
23 as many people as possible on as wide a range of  
24 topics related to this rule.

25 Next slide, please.

1                   Okay. And remember, there were other  
2 ways to comment.

3                   So we are slated to run to 6:00. I'm  
4 anticipating we will have time to get through  
5 everyone today, but if we don't, or if you watch  
6 this rulemaking hearing and later think I really  
7 wish I had made a comment about something, there  
8 will be an opportunity for you to submit written  
9 comments afterwards.

10                  And, again, all the comments get  
11 considered in the same way regardless of how they  
12 are received. But I want you to understand that I  
13 review every single comment that comes in in a  
14 rulemaking case so that I can fully understand, and  
15 the agency reviews all of those comments as well.

16                  All right. Next slide, please.

17                  So when you are commenting, you should  
18 state and spell your first and last name. If you're  
19 here on behalf of an organization, we need you to  
20 identify that organization. It's important to speak  
21 slowly, clearly, and loudly, as only audible  
22 statements are recorded.

23                  We do, as I noted, have a court reporter.  
24 It is possible the court reporter might jump in if  
25 she doesn't hear something on her end and needs to

1 ask a question, so be prepared for that if that  
2 happens.

3 Please, if you're identifying a name of  
4 something or someone or you are using a technical  
5 term or an acronym, please help me and help the  
6 court reporter get that down by spelling names and  
7 technical terms, and for a acronym let us know what  
8 the full phrase is so we make sure we get a full  
9 record.

10 Next slide, please.

11 The court reporter's transcript is the  
12 official record of the hearing. And the agency and  
13 I will both cite to that. And then the transcript  
14 will include your comments, whatever you comment on  
15 today, and I may quote you in the report. That's  
16 true of comments that are made here on the record or  
17 comments that are made that are submitted into the  
18 record in writing.

19 Recording of this hearing is prohibited.  
20 It's very important to note that the official record  
21 of this proceeding is the record that the court  
22 reporter is creating.

23 I also want to note that while the chat  
24 function is active, because that's how we're getting  
25 our queue set up for commenters, the chat is not a

1 place to do anything, other than if you have a  
2 question and you need that to be addressed so that  
3 you can comment, you can put it into the chat, and  
4 if you would like to speak, please put your name  
5 into the chat, but for any other purposes, such as  
6 responding to a comment that someone has made,  
7 responding if someone does put something in the chat  
8 that is more like the comment doing that or  
9 responding doing that or responding to it. Those  
10 are not appropriate ways to use the chat, the chat  
11 is not a part of the record and this is a formal  
12 legal proceeding, so I want to be clear to  
13 distinguish this from things like social media where  
14 there might be some back and forth, there isn't any  
15 back and forth in the chat. And I will not review  
16 it, the court reporter will not review it, it will  
17 not be a part of the record. So make sure you only  
18 use the chat for its intended function. If you're  
19 having a technical problem and you want to alert the  
20 MPCA, if have a question or have a comment that you  
21 would like to comment, those are the things that the  
22 chat is for.

23 All right. Next slide, please.

24 So let's talk the comment period. There  
25 was an initial comment period that closed earlier.

1 And one of the facets of rulemaking is that  
2 sometimes we need to have some additional comments  
3 after the hearing is done to ensure a good record.  
4 And so there is a 20-day period that I can order for  
5 additional comments. So comments will need to be  
6 received by 4:30 p.m. on March 19th, and I'll note  
7 for the record, I am ordering that the comment  
8 period is extended until that time. As of tomorrow,  
9 our comment portal will go live again so that you  
10 can file a comment in the eComments portal as of  
11 tomorrow, and that will remain up until 4:30 p.m. on  
12 March 19th. If you want to submit your comment in  
13 writing in some other way, remember that also does  
14 need to be received by 4:30 p.m. on March 19th.

15 Next slide, please.

16 All right. Then after that 20-day  
17 comment period there is a five-business-day or  
18 five-working-day rebuttal period after the close of  
19 the initial comment period. Rebuttal comments must  
20 be received by 4:30 p.m. on March 26th, 2025. Those  
21 can be filed in any of the same ways that you file  
22 initial comments. They can be filed on our eComment  
23 site or by mail or by fax. You also can drop a  
24 comment off here at our office at the OAH, that is a  
25 rarer way that folks comment, but we have had that

1 done. It's important to note that rebuttal comments  
2 are not an opportunity to comment as an initial  
3 matter, so we're not introducing new materials or  
4 new topics. Rebuttal comments are designed to  
5 respond to issues that have been raised during the  
6 initial comment period.

7 Next slide, please.

8 All right. After we are done with this  
9 hearing and the record closes, after all of those  
10 comments are received, I will issue a report  
11 regarding the rule. Within 30 days of the close of  
12 the record is the deadline for that. So within 30  
13 days of the close of that rebuttal comment period,  
14 unless an extension is granted. And I don't know  
15 whether any extension will be granted because I  
16 don't know what the record is going to look like.  
17 If an extension is granted, it will be for a  
18 specific period.

19 That report will be available online on  
20 the Office of Administrative Hearings website in our  
21 Administrative Law Archives and so there are some  
22 links there. And I'm wondering if staff from the  
23 PCA could also put that link into the chat as well  
24 so that folks can pick up and you can know what that  
25 website is. And then the report is going to be

1 posted on the day that it's issued. So as of the  
2 date that the report comes out, it is going to be  
3 publicly available from our office. And the MPCA  
4 has its own rulemaking website and I anticipate it  
5 will post it on that as well, so that's another  
6 place that you can look for that information.

7 All right. Next slide, please.

8 Just a note, if you are a lobbyist, I  
9 want to remind you that you have to register with  
10 the Campaign Finance and Public Disclosure Board.  
11 If you have any questions about that requirement you  
12 should direct those to the board. We don't answer  
13 questions about that, but we do want to make sure  
14 that we remind folks if you're participating as a  
15 lobbyist that you do need to be registered.

16 All right. Next slide, please.

17 All right. It's time for the agency.  
18 Let me make one more comment before we go to the  
19 agency because I haven't talked about this earlier.  
20 I want to be clear that the Office of Administrative  
21 Hearings, while we accept eComments through our  
22 eComments website, we do not accept comments by  
23 email. So emails to me are off limits, emails to  
24 our staff are not a way that you can comment. If  
25 you are going to comment it has to be in one of

1 those approved methods.

2 All right. I'm going turn it over to the  
3 agency. The folks in the agency are going to  
4 introduce themselves and will get into discussing  
5 the record.

6 What I think I'd like to do is, as we get  
7 going with exhibits, for the person -- you're going  
8 to have a speaker who is going to talk about the  
9 exhibits, once that person is up and running on the  
10 page I'm going to go ahead and receive the exhibits  
11 into the record.

12 All right. MPCA staff, you're up.

13 MS. KAYLA BILLETT: Thank you, Your  
14 Honor.

15 My name is Kayla Billett, K-A-Y-L-A,  
16 B-I-L-L-E-T-T. I use she/her pronouns. And I'm  
17 Associate General Counsel of the Minnesota Pollution  
18 Control Agency, referred to as MPCA. Address is at  
19 520 Lafayette Road North, St. Paul, Minnesota  
20 55155. I'm appearing in this rule proceeding on  
21 behalf of the Minnesota Pollution Control Agency.

22 The Minnesota Pollution Control Agency is  
23 proposing amendments to rules governing Air Toxics  
24 Reporting requirements as directed by Minnesota  
25 Session Law 2003, chapter 60, House File Number

1           2310.

2                       First, I would like to introduce MPCA  
3 staff here today who will be making a presentation  
4 about the proposed rule amendments.

5                       Megan Kuhl-Stennes, who will introduce  
6 herself shortly, is an Air Policy Planner in the Air  
7 Policy Unit in MPCA's Environmental Analysis and  
8 Outcomes Division. Ms. Kuhl-Stennes is a lead  
9 planner for the proposed rules.

10                      Rachel Olmanson is an Air Emissions  
11 Inventory Coordinator in the Air Data Analysis Unit  
12 in MPCA's Environmental Analysis and Outcomes  
13 Division. Ms. Olmanson is a subject matter expert  
14 on Air Toxics Emissions Inventory.

15                      After introduction of the hearing  
16 exhibits, Ms. Kuhl-Stennes and Ms. Olmanson will  
17 make a presentation on the proposed rule amendments.

18                      Lastly, Addison Otto is the Coordinator  
19 for this rulemaking. Ms. Otto manages the  
20 administrative procedures aspects of this rule and  
21 is the point of contact for process-related  
22 questions.

23                      Before the presentation, I would like to  
24 submit a hearing record -- submit into the hearing  
25 record the hearing exhibits. These exhibits are

1 posted on the agency's website. The purpose of  
2 these documents is, as you outlined, to document the  
3 legal authority of the Minnesota Pollution Control  
4 Agency to adopt proposed rules and to demonstrate  
5 that the agency has fulfilled all relevant legal and  
6 procedural requirements for promulgating a rule  
7 and, lastly, to demonstrate that each portion of the  
8 proposed rule is needed and reasonable.

9 JUDGE PALMER-DENIG: Ms. Billett, I'm  
10 sorry. So we're still on the Air Toxics Emissions  
11 Reporting Rule Hearing initial slide. Do you know  
12 the slide that contains the information about your  
13 exhibits?

14 UNIDENTIFIED: No, we do not.

15 JUDGE PALMER-DENIG: I just wanted to  
16 make sure we were in the right place in the  
17 PowerPoint. Here's what I'm going to do.

18 Ms. Billett is going to go through the  
19 exhibits in detail and explain everything about what  
20 is in what exhibit that you need to know. What I'm  
21 going to do is go ahead and receive the exhibits  
22 into the record so that she can do that, and all of  
23 the documents that she's going to talk about are  
24 officially received into the rulemaking record.

25 So the agency had previously filed with

1 our office Exhibits A through K, which are related  
2 to specific components of things that the agency has  
3 to show that it has done or has to file under law  
4 and rule, and I'm informally receiving into the  
5 record Exhibits A through K so that those are in the  
6 record. There will be an additional Exhibit L,  
7 which will be this PowerPoint that will be filed  
8 later, and then of course the transcript from the  
9 court reporter will also be filed later.

10 All right. Ms. Billett, take it away.

11 MS. KAYLA BILLETT: Thank you, Your  
12 Honor.

13 Exhibit C contains the text of the  
14 proposed rule amendments. Exhibit D-1 contains the  
15 Statement of Need and Reasonableness. This is  
16 referred to as the SONAR. The SONAR documents the  
17 statutory authority of the Minnesota Pollution  
18 Control Agency to adopt a proposed rule. The MPCA  
19 has legal authority to promulgate and revise Air  
20 Quality Rules under Minnesota Statute 116.07,  
21 subdivision 4, and Minnesota Statute 116.062.

22 The SONAR in Exhibit D-1 also  
23 demonstrates that each portion of the proposed rule  
24 is needed and is reasonable. The SONAR includes  
25 both a general description of why the proposed rule

1 is needed and is reasonable, and a detailed  
2 description of why each rule part is needed and  
3 reasonable.

4 D-2, Exhibit D-2, contains the proposed  
5 Air Toxics Reporting list and identifies the air  
6 toxic pollutants that must be reported in the annual  
7 emissions inventory, including those that are  
8 incorporated by reference in the rule.

9 Many of the other exhibits demonstrate  
10 that the agency has fulfilled all relevant legal and  
11 procedural requirements. These include the  
12 following: Exhibit A-1, the initial request for  
13 comments that started the formal rulemaking process.  
14 Exhibit A-2, the second request for comments to  
15 incorporate a repeal of Emergency Affirmative  
16 Defense provisions into the rulemaking. Exhibit C,  
17 the Revisor's approval of the proposed rule.  
18 Exhibit E, the certificate verifying submission of  
19 the SONAR to a legislative reference library.  
20 Exhibit F, the Dual Notice of Intent to Adopt Rules,  
21 as mailed and posted electronically on the MPCA web  
22 page and as published in the State Register.  
23 Exhibit G-1, the Certificate of Mailing of the  
24 Notice of Intent to Adopt the Rules. Exhibit G-2,  
25 the GovDelivery bulletin with recipient count.

1 Exhibit G-3, the Certificate of Accuracy of the  
2 Mailing List. Exhibit H, the Certificate of  
3 Additional Notice. Exhibits K-1 and K-2 include  
4 evidence of compliance with requirements to notify  
5 legislators. And Exhibit K-3, the approval by  
6 Minnesota Management and Budget of the Agency's  
7 fiscal analysis of the impact of the rules. And  
8 as -- oh, and Exhibit I-1 includes the copies of  
9 comments on the proposed rules that MPCA received  
10 during the prehearing comment. In addition to  
11 Exhibit I-2, which includes the agency's responses  
12 to the comments on the proposed rules that the MPCA  
13 received during the prehearing comment period.

14 Now Ms. Kuhl-Stennes and Ms. Olmanson  
15 will make a presentation outlining proposed rule  
16 amendments and summarizing the need for -- the need  
17 and reasonableness, excuse me, of the proposed rule  
18 amendment. The presentation will take about 25  
19 minutes.

20 MS. MEGAN KUHL-STENNES: Thanks, Kayla.

21 My name is Megan Kuhl-Stennes, M-E-G-A-N,  
22 K-U-H-L, hyphen, S-T-E-N-N-E-S. And I use she/her  
23 pronouns as well.

24 I'll also have my colleagues introduce  
25 themselves as well.

1 Rachel, do you want to introduce yourself  
2 and spell your name?

3 MS. RACHEL OLMANSON: Yes.

4 Hello. My name is Rachel Olmanson,  
5 spelled R-A-C-H-E-L, O-L-M-A-N-S-O-N.

6 Thank you, Megan.

7 MS. KAYLA BILLETT: And Addison.

8 MS. ADDISON OTTO: Yes. My name is  
9 Addison Otto, and that's spelled A-D-D-I-S-O-N,  
10 O-T-T-O.

11 MS. KAYLA BILLETT: Thank you both.

12 MS. MEGAN KUHL-STENNES: I am a planner,  
13 an air policy planner with the Minnesota Pollution  
14 Control Agency and I'll be guiding us through the  
15 presentation today.

16 So a little bit of our agenda for our  
17 presentation, we'll talk about why we're doing Air  
18 Toxics Emissions Reporting. I'll briefly review the  
19 statute that the legislature provided for us to do  
20 this rulemaking. We'll go through the proposed  
21 public exhibit list. We'll go through the proposed  
22 rule concept. And there is a proposed repeal that  
23 we will go through some details about as that  
24 applies statewide.

25 So this rule is really important to the

1 Minnesota Pollution Control Agency. Currently, Air  
2 Toxics Emissions Reporting is only voluntary and it  
3 is completed every three years. So the Minnesota  
4 Pollution Control Agency is looking for more  
5 complete data on Air Toxics Emissions in the  
6 seven-county metro area. This will lead to annual  
7 reporting. There will also be mandatory. And we  
8 have found that emissions can change from year to  
9 year from different facilities, so this will help us  
10 get more comprehensive information.

11 From this reported information, we can  
12 assess risk for exposure. Which will then help us  
13 guide agency policy and decision making. And as  
14 well as we listed in the SONAR, it will inform  
15 communities about health or environmental risks from  
16 air toxics.

17 So I'll go into what the legislature  
18 required in statute 116.062.

19 So the legislature gave us rulemaking  
20 authority for -- and told us to do this rulemaking.  
21 In that statute, it would be applicable to all Twin  
22 Cities metro area counties, including the  
23 seven-county metro area that you see on your screen.  
24 It does not include registration option B facilities  
25 and it would be annual reporting for all facilities

1 emitting air toxics with methods determined by the  
2 Commissioner. And so that's what we'll go through  
3 in this presentation a little bit later on.

4 As well as in the statute there was a  
5 deadline that we had to provide a Notice of Intent  
6 to Adopt, which we did, we met that deadline as our  
7 Notice of Intent to Adopt was published  
8 November 25th, 2024.

9 Additionally, in this statute there was a  
10 list of -- there was a definition of air toxics that  
11 would be considered. And so there were five  
12 lists -- excuse me -- that we were required to  
13 review for finding air toxics. These lists are the  
14 Hazardous Air Pollutants list, or HAPs. Chemicals  
15 emitted into the air and on the Toxic Release  
16 Inventory, also called the TRI list. Chemicals that  
17 the Minnesota Department of Health, also called MDH,  
18 has developed Health-Based Values for risk  
19 assessment advice. Chemicals Risk to Human Health  
20 has been assessed by the Environmental Protection  
21 Agency, EPA, Integrated Risk Information System,  
22 also called IRIS. As well as chemicals reported in  
23 the most recent Voluntary Triennial Emissions  
24 Inventory.

25 Just a little bit more about those lists.

1 The Hazardous Air Pollutants list is established in  
2 federal rule and regulated by the Environmental  
3 Protection Agency, EPA. The Toxic Release Inventory  
4 was also established in federal rule originally to  
5 track waste management of certain toxic chemicals.  
6 Only some facilities are required to report to the  
7 Toxic Release Inventory.

8 The Health-Based Values or Risk  
9 Assessment Advice developed by the Minnesota  
10 Department of Health, the Health-Based Values  
11 developed under comprehensive chemical review. And  
12 the Risk Assessment Advice has a little bit less  
13 rigorous review as the information is limited, but  
14 they are a statewide list maintained.

15 The Integrated Risk Information System is  
16 a broad list of pollutants that have noted pathways  
17 of risk from chronic exposure to chemicals. This  
18 would be inhalation risk, oral risk, or other  
19 pathways. And all of those are noted in IRIS.

20 And then the Minnesota Pollution Control  
21 Agency, MPCA, Air Toxics Emissions Inventory, which  
22 contains many of the chemicals that are within those  
23 lists, but they also have some pollutants specific  
24 to Minnesota's environment and priorities.

25 MPCA's list includes many per-and

1 polyfluoroalkyl substances, or PFAS.

2 So we'll get into -- so that was just  
3 what was in the statute, and we used that to move  
4 forward for writing the rule.

5 So into our Proposed Pollutant List, we  
6 took an approach to that. First we defined air  
7 toxics, and you can see the definition there, known  
8 or suspected to cause cancer or other serious health  
9 effects or adverse environmental and ecological  
10 effects. And then we listed all of these in the  
11 Rule 7019.3110, subpart 2. So in reviewing the  
12 lists provided in Statute 116.062, the MPCA  
13 considered factors such as Pollutants with  
14 Inhalation Risks; Pollutants Reported in Minnesota;  
15 Pollutants of Multi-Pathway Concern: Persistent,  
16 Bioaccumulative and Toxic Chemicals; and, PFAS of  
17 concern in Minnesota. The concern with PFAS is  
18 often in water as of late, but some of these come  
19 from air and deposited water.

20 So what we included in our pollutant list  
21 for this rule is all Hazardous Air Pollutants.  
22 That's all the Toxics Release Inventory per-and  
23 polyfluoroalkyl substances, PFAS. All pollutants  
24 assessed by Integrated Risk Information System that  
25 have inhalation risk, all pollutants that have

1 Health-Based Values evaluated by the Minnesota  
2 Department of Health, MDH. All pollutant assessed  
3 by the Integrated Risk Information. All pollutants  
4 on the Toxic Release Inventory, or TRI, that have  
5 inhalation risk. And pollutants on the MPCA  
6 Emissions Inventory that have Minnesota-specific  
7 concerns. This includes many PFAS from Other Test  
8 Method-45 and 50. These are staff tests that some  
9 facilities are doing or are required to do as part  
10 of their air permits, and so this will allow them to  
11 be reported. As well as additional PFAS reported  
12 and prevalent in Minnesota. We also included  
13 additional pollutants that are on the IRIS list or  
14 TRI lists that have multi-pathway concerns. All of  
15 these pollutants are listed in our SONAR, Exhibit 1.  
16 Or also SONAR Exhibit 1 or Exhibit D-2.

17 Many of these lists are incorporated by  
18 reference, and so that means when new chemicals are  
19 added or removed, the MPCA does not have to amend  
20 the rule. However, the MPCA will provide a  
21 comprehensive list of all pollutants facilities will  
22 be required to report prior to the start of the  
23 reporting period. So we don't expect people to keep  
24 track of that themselves, we can absolutely provide  
25 that comprehensive list.

1 Facilities must report individual  
2 pollutants to the maximum extent feasible. And  
3 Rachel will talk more about that in her part. And  
4 like I said, that proposed list is included as part  
5 of SONAR Exhibit 1 or Exhibit D-2. It has that list  
6 of individual pollutants and pollutant groups and  
7 compounds that are proposed to be included. This is  
8 up to date as of July 31st, 2024.

9 Now I'll turn it over to my colleague,  
10 Rachel.

11 MS. RACHEL OLMANSON: Thanks, Megan.

12 This is Rachel Olmanson speaking again.  
13 I will be assessing proposed rule concepts,  
14 including definitions and clarifications, lists of  
15 Air Toxics Reporting and recordkeeping, how and when  
16 a facility will report, methods to calculate  
17 emissions, and then some additional detail on those  
18 methods for calculation.

19 Next slide.

20 The proposed rule includes a definition  
21 for Air Toxics Reporting Facilities. These are  
22 facilities with air permits that are located in  
23 Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, or  
24 Washington Counties as you can see on the map on the  
25 side. Facilities with Registration Option B permits

1 will not be required to report Air Toxics Emissions  
2 under this proposed rule.

3 Currently, mercury emission sources for  
4 stationary purposes with actual mercury emissions of  
5 three pounds per year or more after controls must  
6 report mercury emissions annually, but with this  
7 proposed rule, facilities that are Air Toxics  
8 Reporting Facilities as described above must report  
9 all mercury emissions as provided under Minnesota  
10 Rule part 7019.3110.

11 Next slide.

12 The new section of Rule 7019.3110 also  
13 includes recordkeeping requirements and the  
14 pollutants required to be reported. Air Toxics  
15 Reporting Facilities must keep records of emissions,  
16 including calculations, for five years. This  
17 includes safety data sheets or SDSs or vendor  
18 certifications as well as any reductions claimed in  
19 emissions calculations due to recycling or disposing  
20 materials offsite, including invoices, shipping  
21 papers, or hazardous waste manifests.

22 The new section of rule also includes the  
23 pollutants that are required to be reported, as  
24 Megan described previously. Hazardous Air  
25 Pollutants, or HAPs, included in the Clean Air Act

1 are incorporated by reference, as Megan mentioned,  
2 as well as the PFAS pollutants that are included on  
3 the Environmental Protection Agency's lists of Toxic  
4 Released Inventory, or TRI pollutants. All other  
5 pollutants that must be reported are listed  
6 individually in Minnesota Rule 7019.3110.

7 Okay. And then -- oh, can you go back  
8 one second? Thanks.

9 So one other thing to note with the  
10 pollutants. For pollutant names that contain the  
11 word compounds, such as nickel compounds or chromium  
12 compounds, any chemical substance that contains the  
13 named chemical as part of the chemical's  
14 infrastructure must be reported. For example,  
15 nickel bromide and nickel nitrate are air toxics and  
16 they contain the word nickel and therefore must be  
17 reported in the Air Toxics Emissions Inventory.  
18 This language is consistent with the language  
19 included in the Clean Air Act List of Hazardous Air  
20 Pollutants.

21 Next slide.

22 Okay. MPCA is proposing that 2026  
23 calendar year would be the first reporting year, so  
24 the Air Toxics Emissions Inventory reports would be  
25 due April 1st, 2027. The April 1st deadline is

1 consistent with the current deadline for submitting  
2 annual emission inventory reports. This proposed  
3 rule would require annual reporting of Air Toxics  
4 Emissions for Air Toxics Reporting Facilities,  
5 which, as Megan mentioned earlier, this is a change  
6 from the current Voluntary Air Toxics Reporting.

7 The report must be submitted in a format  
8 specified by the Commissioner. This language is  
9 consistent with the language in rule for criteria  
10 and greenhouse gas reporting. The rule also  
11 incorporated the certification language that's  
12 currently in Minnesota Rule 7019.3000 that is  
13 required for the current Annual Emission Inventory  
14 Report.

15 Reporting will be similar to current  
16 voluntary reporting of the voluntary Air Toxics  
17 Emissions Reporting that's completed in the  
18 Minnesota Pollution Control Agency's electronic or  
19 need services system. This is also similar to the  
20 current reporting that is completed by facilities  
21 for criteria and greenhouse gas emission reporting.  
22 Note that facilities with general nonmetallic  
23 permits currently submit their data and their  
24 emission inventory reports with paper forms.

25 Okay. Next slide.

1                   Now I'll discuss the details of  
2                   calculating and reporting emissions. So the Air  
3                   Toxics Emissions Reporting will follow the same  
4                   method hierarchy that is used for Criteria Pollutant  
5                   Reporting and listed in Minnesota Rule part  
6                   7019.3030. This list is in order from most  
7                   preferred to least preferred methods, with the most  
8                   preferred being continuous emission monitor data,  
9                   followed by performance test or stack test data.  
10                  The next preferred method includes a few different  
11                  items, including Volatile Organic Compounds, or  
12                  VOCs, and Air Toxics Material Balance Calculations,  
13                  with material balance emission factors and permit  
14                  limits. As you can see in that third bullet I just  
15                  described, air toxics was added there, as you can  
16                  see.

17                 And then last is if facilities are not  
18                 able to use any of the methods above, they can  
19                 submit a facility proposal to the MPCA for review  
20                 and approval. And this is relating to the current  
21                 approach that is used for Criteria Pollutant  
22                 Reporting.

23                 All right. Next slide.

24                 Now I'll get into a little more detail on  
25                 reporting Air Toxics Emissions, including reporting

1 pollutants that are part of groups, insignificant  
2 activities, and the proposed de minimis reporting.

3 So some Air Toxics Pollutants are  
4 included under groups of pollutants. For example,  
5 the group includes about 30 individual pollutants.  
6 The proposed rule language states that facilities  
7 must report individual pollutants or pollutants  
8 within a group such as glycol ethers, chromium  
9 compounds, to the maximum extent feasible. If a  
10 facility cannot report individual pollutants within  
11 a group, they can report emissions under the group.

12 The two tables on this slide illustrate  
13 these two options. The top table shows an example  
14 where a facility is able to report individual glycol  
15 ether pollutants. In this example, the facility is  
16 using a material that includes three individual  
17 glycol ether pollutants. The bottom table  
18 illustrates an example where a facility does not  
19 have information to report all individual glycol  
20 ether pollutants, and therefore can report emissions  
21 under the group glycol ethers. We provide these  
22 options in the proposed rule language because the  
23 MPCA understands there may be certain situations  
24 where it's not possible to report individual  
25 pollutants.

1                   Next slide.

2                   MPCA, the Pollution Control Agency, is  
3                   proposing that facilities will not be required to  
4                   report air toxic submissions associated with  
5                   insignificant activities listed in Minnesota Rule  
6                   part 7007.1300, or conditionally insignificant  
7                   activities included in Minnesota Rule part  
8                   7008.4000. Examples of these activities include  
9                   routine maintenance, of buildings grounds and  
10                  equipment, or janitorial activities. This proposal  
11                  is consistent with the current requirements of  
12                  pollutant reporting.

13                  If a facility has control equipment in  
14                  place to remove or reduce the amount of pollution  
15                  emitted and is following the requirements of the  
16                  control equipment rule, the facility must factor the  
17                  equipment into the calculations as described in  
18                  Minnesota Rule part 7005.0100, subpart b. For  
19                  example, a volatile organic compound, or VOC, where  
20                  control efficiency factors can be used for volatile  
21                  air toxics and PM10 factors for particulate air  
22                  toxics. PM10 is particulate matter that is 10  
23                  micrometers or less in diameter. Factoring in  
24                  control equipment will provide more accurate  
25                  representative emissions to the Pollution Control

1 Agency.

2 Next slide.

3 And last I will talk about the de minimus  
4 for reporting. The Pollution Control Agency is  
5 proposing a de minimis reporting. De minimus means  
6 the minimum amount of emissions that needs to be  
7 reported. If facilities are using a calculation  
8 method other than material balance, like an  
9 emissions factor, facilities must report all  
10 emissions for all pollutants.

11 Okay. Next.

12 If facilities are using the air toxics  
13 material balance for calculating emissions,  
14 facilities must report all emissions for pollutants  
15 with no de minimus. And I will show those  
16 pollutants on the next slide.

17 For all other pollutants, facilities must  
18 report if the air toxic concentration is one percent  
19 or more of the material on the safety data sheet,  
20 or .1 percent for an air toxic that is a carcinogen  
21 or potential carcinogen on the safety data sheet.

22 Next slide.

23 And here is the list of pollutants with  
24 no de minimis. These pollutants include air toxics  
25 that are highest risk to human health and can be

1 toxic in very small amounts. They also are  
2 pollutants that are Persistent Bioaccumulative  
3 Toxins, or PBTs. These PBT chemicals are of concern  
4 because they are toxic, but also because they remain  
5 in the environment for long periods of time, cannot  
6 readily break down, and they build up or accumulate  
7 in body tissues.

8 Next slide.

9 I think I'll hand it back over to Megan.

10 Thank you.

11 MS. MEGAN KUHL-STENNES: Thank you.

12 This is Megan Kuhl-Stennes talking again.

13 And I'm just going to talk a little bit  
14 about our economic analysis which is included in our  
15 SONAR. We used the information facilities provided  
16 during the feedback period we had this spring. It  
17 was an informal feedback period and we used this to  
18 generate our economic analysis.

19 So we generated all the costs to MPCA,  
20 the facility costs to report and used that to  
21 complete our economic analysis. And we estimated  
22 that the total cost to all Twin Cities metro area  
23 facilities would be around 2.2 to 3.9 million  
24 dollars, which is a very small portion of the  
25 state's total economy.

1                   We also came to the conclusion that it  
2                   would be less costly and more effective than simply  
3                   monitoring for all these pollutants. Much more  
4                   information is about that in the SONAR in Section 6,  
5                   the regulatory analysis.

6                   I'm going to talk a little bit about the  
7                   proposed repeal that we have included as well in  
8                   this rule. The Title V Emergency Affirmative  
9                   Defense Repeal is included because Emergency  
10                  Affirmative Defense is a claim that facilities could  
11                  make, but the Clean Air Act, as the PCA has  
12                  interpreted it, requires consistency. And so the  
13                  PCA had finalized a rule effective August 8th, 2023  
14                  that removed the Emergency Affirmative Defense  
15                  provision from the Clean Air Act Title V operating  
16                  permit program regulations. Then EPA set a deadline  
17                  for states to remove this language from state rules  
18                  by August 21st, 2024, or seek an extension, which  
19                  MPCA sought and was granted an extension until  
20                  August 21st, 2025 to repeal the Emergency  
21                  Affirmative Defense provision from state rules. And  
22                  so it was only used in one permit in the state and  
23                  it has been removed from that permit and we just  
24                  need to remove it from the rule that allows it.

25                  So we do want to note that while the rest

1 of the rule applies only to the Twin Cities metro  
2 area, the Twin Cities seven-county metro area  
3 counties, the repeal of this rule language applies  
4 statewide, which is important to note.

5 With that, that is all of our  
6 presentation today and I'll turn it back over to  
7 Kayla.

8 MS. KAYLA BILLETT: Thank you. This is  
9 Kayla Billett speaking.

10 That concludes our presentation and I  
11 have nothing further, Your Honor.

12 JUDGE PALMER-DENIG: Thank you very much.

13 All right. I think we have another slide  
14 that's going to take us back to comments after this  
15 one. Very good. The next one, please. There we  
16 go.

17 We are going to take a short break  
18 because we have been running for almost an hour and  
19 we need to give our court reporter a break and we  
20 need to make sure that we get our queue up and  
21 running.

22 Now is a really good time for everyone to  
23 start doing what you need to do to be able to get  
24 into the comment queue during the break so that we  
25 can get up and running when we get back.

1                   If you are here via WebEx, please put  
2                   your name in the chat box, your first and last name,  
3                   please, to request to be placed into the queue. If  
4                   you are here by phone, please press \*3 on your phone  
5                   to add yourself to the comment queue, then when you  
6                   are going to remove yourself, you will also press  
7                   \*3. But just press \*3 and that's how you can add  
8                   yourself. So this is a great time for you to do  
9                   that.

10                  Why don't we come back at 4:05, so we'll  
11                  just take a little bit more than ten minutes and  
12                  that will give everyone time to get themselves  
13                  queued up.

14                  So we will go on a brief break. I don't  
15                  know if we have a slide that says we're on a break  
16                  or if we're -- we're seeing if we maybe have a slide  
17                  that says that. If we don't, we're just going to  
18                  leave this slide up and running so everyone has the  
19                  information. So on WebEx, please put your name in  
20                  the chat, if you are by phone, \*3. And we will come  
21                  back at 4:05 and we will begin the comment period  
22                  then.

23                  Thank you very much.

24                  (Break taken from 3:54 p.m. to 4:05 p.m.)

25                  JUDGE PALMER-DENIG: All right. It is

1 4:05 p.m. and we are going back on the record.

2 Let me check in. We have an MPCA staff  
3 person who is managing the queue. I just want to  
4 check in, I'm going to look at the chat myself and  
5 see, do we have anybody who has indicated an  
6 interest in speaking by putting their name in the  
7 chat?

8 MS. ADDISON OTTO: We have not received  
9 any requests to speak yet.

10 This is Addison Otto with the MPCA.

11 JUDGE PALMER-DENIG: Very good. Thank  
12 you.

13 So, this is it, folks, so I'm just going  
14 to note, we have -- I want to check in and see how  
15 many people we have. We have 72 people, I think, in  
16 the meeting, and I am interested in what everybody  
17 has to say or what folks think about the rule.

18 And so I want to encourage you. You do  
19 not have to be a good public speaker to comment on a  
20 rule in a rule hearing, we take everybody just as  
21 they come. If you have a thought about this rule,  
22 if you have concerns about this rule, if you like  
23 it, you don't like, if you like part of it, you  
24 don't like part of it, now is a really good time to  
25 let me know that.

1           If you have any concerns about the way  
2           the rule is written or about compliance with the  
3           rule, things like that are things that we often get  
4           comments about and now is a good time to let me know  
5           about that.

6           Now, I know that some people are not  
7           super comfortable public speakers, and I want to  
8           assure you that that is not a problem here and that  
9           this is a great opportunity for you to do that. If  
10          you are one of those folks who just feel like you  
11          can't do that, please do note that there will be a  
12          written comment period. And I certainly will enjoy  
13          reading your comments that are filed in writing, but  
14          I want to make sure that everybody has the very best  
15          opportunity as possible this evening to go ahead and  
16          make a comment.

17          So, remember, go ahead and put your name  
18          in the chat box, first and last names into the chat  
19          if you would like to make a comment. If you would  
20          like to make a comment on this rule hearing, if  
21          something has worked for you, something has not  
22          worked for you, something that you can provide to me  
23          as well by making a comment.

24          If you are on the phone, please press \*3  
25          to indicate that you would like to make a comment so

1           that we can grab your phone number and put you into  
2           the queue.

3                       I'm going to give folks just a couple of  
4           minutes to courageously put their information into  
5           the chat or to press \*3 on the telephone so that we  
6           can make sure that we hear from you.

7                       MS. ADDISON OTTO: We do have someone in  
8           the chat.

9                       JUDGE PALMER-DENIG: All right. Very  
10          good.

11                      So I am looking at the chat, and just  
12          because someone has signed up doesn't mean you  
13          shouldn't sign up.

14                      So I'm going to go ahead and take the  
15          comment from the commenter who has spoken while I'm  
16          doing that. Go ahead and put your name, your first  
17          and last name into the chat or go ahead and press  
18          \*3, and we're going take comments as they come in.

19                      So I'll note that Janet Keyes of CHESS,  
20          Inc., is the person who has indicated an interest in  
21          speaking.

22                      Go ahead and unmute yourself, and it  
23          looks like you are here in the WebEx, so if you  
24          could turn on your video.

25                      MS. JANET KEYES: Correct, I am. I

1 cannot start video because this computer doesn't  
2 have it. You'll have to pretend that you see me.

3 JUDGE PALMER-DENIG: Please go ahead and  
4 state and spell your first and last name.

5 MS. JANET KEYES: Janet Keyes, J-A-N-E-T,  
6 K-E-Y-E-S. The company's name is CHESS, Inc.,  
7 C-H-E-S-S, Incorporated.

8 And the comment I have is for companies  
9 using material balance to do the calculations.

10 Things such as chromium and nickel  
11 compounds have no de minimis. If you are using  
12 material balance you are relying on safety data  
13 sheets or environmental data sheets to obtain the  
14 information, given that those would not be required  
15 to show up if they are -- unless they are present in  
16 at least one-tenth of one percent. How are  
17 companies to determine that, for instance, the  
18 chromium or nickel or other no de minimis compounds  
19 are present if they don't show up on the safety data  
20 sheet and you're not required to actually analyze  
21 the products? So if you're doing material balance.

22 JUDGE PALMER-DENIG: All right. And I'm  
23 just going to see. Is that a question that someone  
24 from MPCA can answer or is that a question that  
25 would need to be addressed in responses to public

1           comments?

2                       Let me just check in with the MPCA and  
3           ask where you would be on doing a response to that  
4           question. And I'm not sure who would be the right  
5           person to address that from the MPCA.

6                       MS. KAYLA BILLETT: Thank you, Your  
7           Honor.

8                       This is Kayla Billett speaking.

9                       I can answer the question, or I can  
10          answer the question saying we will need more time to  
11          consider the question further and respond to it  
12          during the rebuttal period.

13                      JUDGE PALMER-DENIG: All right. That  
14          sometimes happens. Some questions people can say,  
15          yes, it's in the SONAR at this page or we've  
16          addressed it in this section, and other questions  
17          are things that the agency needs to really  
18          contemplate and go back and look at and then address  
19          in another way.

20                      So, Ms. Keyes, I appreciate your  
21          willingness to be our first commenter this evening  
22          and to sort of step forward to offer that  
23          perspective and that question for the MPCA to  
24          answer.

25                      Let me check, Ms. Keyes, is that all that

1           you would like to address or is there something more  
2           that you would like to add for your comment?

3                       MS. JANET KEYES: That is all, I think.  
4           That is all.

5                       JUDGE PALMER-DENIG: All right. Thank  
6           you very much.

7                       According to the chat, I don't think we  
8           have another speaker who is lined up to comment. I  
9           want to strongly encourage folks, if you have a  
10          question like the one that Ms. Keyes asked and you  
11          want MPCA to be aware that there is a question out  
12          there that you would like to have answered either  
13          tonight or through the comment period, that is also  
14          something you can do here tonight.

15                      So please go ahead if you're are  
16          interested in making a comment, asking a question,  
17          put your first and last names into the chat, please,  
18          or press \*3 on your phone.

19                      And we'll be giving folks another minute  
20          to get themselves into the queue.

21                      And I am looking at the participant list.  
22          We have 70 folks on the phone, I'm hoping someone  
23          amongst that 70 is interested in making a comment.

24                      Remember, in the WebEx chat box, first  
25          and last name, or on the phone, \*3.

1 All right. If there's anybody who has  
2 just joined recently, we are in the public comment  
3 and questions time. If you would like to make a  
4 comment or ask a question, please put your first and  
5 last names into the chat so that we can put you into  
6 the queue, or press \*3 on your telephone.

7 And we are slated to run until 6:00, so  
8 it's going to be a very long evening if we have no  
9 commenters to comment. So I'm really hoping that  
10 someone among the 67 people who are now on this call  
11 is interested in making a comment.

12 All right. It looks like we have another  
13 person who is interested in making a comment.

14 Mark, and I'm not sure, Zaban, if you can  
15 unmute yourself and please turn on your camera.

16 MR. MARK ZABAN: Mark Zaban, Z-A-B-A-N.  
17 There we go.

18 JUDGE PALMER-DENIG: Very good. All  
19 right.

20 MR. MARK ZABAN: Can you hear me?

21 JUDGE PALMER-DENIG: Yes. You can state  
22 your name, state and spell your first and last name.

23 MR. MARK ZABAN: Mark Zaban, M-A-R-K,  
24 Z-A-B-A-N.

25 My comment is a question. I counted 907

1 chemicals in the -- was it an appendix to the SONAR?  
2 Are you expecting facilities to report on all 907  
3 chemicals?

4 And I'll just leave it at that as a  
5 question.

6 JUDGE PALMER-DENIG: All right. Thank  
7 you very much.

8 I'm turn it over to MPCA. Is this a  
9 question that you are able to answer this evening or  
10 one that you will need to address in rebuttal  
11 comments?

12 MS. KAYLA BILLETT: Thank you, Your  
13 Honor.

14 We can address that question. This is  
15 Kayla Billett, and Rachel Olmanson will be answering  
16 that question.

17 MS. RACHEL OLMANSON: Thanks, Kayla.

18 My answer would be yes, the facilities  
19 would be required to report all the pollutants that  
20 are included on that list of pollutants if they are  
21 emitting air emissions with those.

22 Thank you.

23 JUDGE PALMER-DENIG: Thank you very much.

24 All right. Anybody else who would like  
25 to make a comment or ask a question this evening,

1 please, in WebEx, put your first and last names into  
2 the chat, or \*3 on your telephone.

3 Mr. Zaban, I appreciate that you were the  
4 second to ask a question as well.

5 I'm going to actually check how many  
6 folks are still on the line with us. We have 60, so  
7 we're declining a little bit. But we still have 60  
8 folks on the line and I'm hoping there is someone  
9 here who, if you have a question or a comment, is  
10 willing to go ahead and do that here this evening.

11 Oh, we just lost one more person. I'm  
12 hoping that my counting of the number is not driving  
13 folks away.

14 Please, definitely, if you are interested  
15 in making a comment, put your first and last name in  
16 the WebEx chat or press \*3 on your phone. Let's see  
17 if we can get another commenter.

18 Then while we're waiting for that, I  
19 actually have a request of MPCA staff, if you're  
20 able to do that. On your website where you have the  
21 documents related to this rulemaking, I'm wondering  
22 if you could throw that URL up into the chat as well  
23 so folks can have that as an easy link to where the  
24 documents related to this rulemaking are.

25 MS. ADDISON OTTO: Addison Otto from the

1 MPCA.

2 Would you like the website link and also  
3 the link to the exhibits list both in the chat?

4 JUDGE PALMER-DENIG: That would be great.  
5 Thank you very much. Then folks can pick it up from  
6 the chat.

7 Minnesota agencies have worked very hard  
8 to be transparent about their rulemaking pages where  
9 they post information and so I want to make sure  
10 that folks are aware of that, to go to this website  
11 and review documents that are from this rulemaking  
12 more extensively than what you're seeing tonight.

13 And thank you, Ms. Otto, I appreciate the  
14 accommodation of putting that into the chat so folks  
15 can pick it up again.

16 We are looking for folks to volunteer to  
17 make a comment this evening. In WebEx, first and  
18 last name into the chat. \*3 on your phone.

19 We still have about 52 people on. Some  
20 PCA staff members who work behind the scenes and who  
21 made a presentation, and of course me and our court  
22 reporter, but there are quite a few people on the  
23 line who are not involved directly in the  
24 rulemaking. And I'm hoping that someone among those  
25 folks is interested in making a comment.

1 Remember in WebEx, first and last name in  
2 the chat, and \*3 on your phone. We are very  
3 interested in hearing from you and in making sure  
4 that we fulfill the function of allowing the public  
5 to make comments.

6 So if you're interested in making a  
7 comment, please do step forward and do that.

8 I think we'll leave the floor open until  
9 4:30, and if no one has indicated an interest in  
10 making a comment we'll probably take another break  
11 for a bit and then come back.

12 So I'm not seeing anybody new who's added  
13 themselves to the chat. Just in case there is  
14 anybody who has just joined the call, because  
15 sometimes we have folks who jump in a little late, I  
16 want to note that if you would like to make a  
17 comment to please put your first and last names into  
18 the chat if you are here by WebEx, and by phone it  
19 is \*3 to add yourself to the queue.

20 We're going to go -- we're going to wait  
21 another five minutes to see if someone joins into  
22 the chat or presses the \*3 to be added to the queue  
23 and, if not, we will take another short break. I am  
24 hopeful that someone will come forward with a  
25 comment.

1           If you think of something after tonight,  
2           though, remember that you can still make a comment  
3           into the record in one of the other ways, through  
4           our eComments portal, by mail, or by fax. Please  
5           remember to put the -- at least you'll want to  
6           navigate the case number, the case number here at  
7           the Office of Administrative Hearings is  
8           71-9003-39354. And that's the case number that will  
9           be associated with this rulemaking on our eComments  
10          website. We also would like for you to put that  
11          case number on any other written submissions that  
12          you make because that is how we make sure that it  
13          gets tracked into the right docket and gets tracked  
14          to me to review. And I see that Ms. Otto has put  
15          that case number up in the chat and I really  
16          appreciate that.

17                 And remember that we are going to be  
18          accepting additional comments until March 19th at  
19          4:30. You do need to have your comment in by 4:30  
20          or it will not be counted as a comment during that  
21          comment period. And then there is a  
22          five-working-day rebuttal period until March 26th,  
23          the deadline on that date is also 4:30.

24                 It is important to note also that  
25          comments are considered a matter of the record when

1 they are received by our office. So if you mail it  
2 by the last day but it is not received by our office  
3 then it does not go into the record. It has to be  
4 received by us by either the 19th at 4:30 or the  
5 26th at 4:30.

6 All right. So it is 4:30, I'm checking  
7 the chat, and I do not see any other commenters who  
8 have indicated an interest in speaking. I just want  
9 to check with the MPCA that we don't have anybody  
10 who has pressed \*3 and we don't have anybody in the  
11 phone queue either.

12 MS. ADDISON OTTO: Yes, Your Honor. I am  
13 staring at the participant list and I have not seen  
14 anyone pop up.

15 JUDGE PALMER-DENIG: Okay. Very good.  
16 Thank you.

17 So with that, we're going to take another  
18 short break. If you use that break time and you  
19 decide that you'd like to make a comment while we're  
20 on the break, put your first and last name into the  
21 chat on the WebEx or press \*3 on your phone. We  
22 will return at 4:40 then we'll see who the next  
23 commenters are. I strongly encourage folks who are  
24 still on the line to go ahead and make a comment.

25 Thank you very much. We'll be back at

1 4:40.

2 (Break taken from 4:31 to 4:40.)

3 JUDGE PALMER-DENIG: All right. We are  
4 back on the record.

5 It's 4:40, we took a brief break. We, as  
6 far as I can tell, we have not had anyone join the  
7 chat to indicate an interest in speaking.

8 Please remember if you would like to make  
9 a comment, please put your name -- and you are here  
10 by WebEx, please put your name into the chat box,  
11 both your first and last name so that we can make  
12 sure we get your comment.

13 If you are here by phone, please press \*3  
14 to get into the queue. We will get the first 6:00  
15 digits of your phone number and we will use that to  
16 unmute you so that you can make a comment.

17 So please indicate an interest in  
18 commenting if you have a comment or a question that  
19 you would like to ask or make of record this  
20 evening. I'll note we still do have 34 people on  
21 the line, that's a great number of people and surely  
22 there is someone there who would like to make a  
23 comment. I want to make sure that you know we're  
24 here to listen to you.

25 So in WebEx, please put your first and

1 last name into the chat to indicate an interest in  
2 speaking, or press \*3 on your phone if you are here  
3 by telephone.

4 Also, if anyone has just joined, I want  
5 to note that if you look in the chat, or I'll just  
6 tell you if you're on the phone, the case number for  
7 this case is 71-9003-39354. We will have an  
8 additional comment period after tonight's hearing  
9 for 20 days until March 19th, and then we will have  
10 a rebuttal comment period for five-working-days  
11 after that expiring March 26th. So by 4:30 p.m. on  
12 either of those days, we would need to have either  
13 your initial comments submitted into the record or  
14 your rebuttal comments submitted.

15 And I noted earlier but I just want to  
16 note again that we don't accept comments by email.  
17 Email is just not secure enough to ensure that we  
18 get everything into the record. Emails go into spam  
19 folders or get quarantined, so we want to make sure  
20 that we get your comment and so we use the methods  
21 of receiving comments that are the most reliable to  
22 do that and email is not one of those.

23 All right. So if you are here and you  
24 would like to make a comment in WebEx, put your  
25 first and last name into the chat, or if you are

1 here by phone please press \*3. And then for folks,  
2 you know, if you know folks who are interested in  
3 this rulemaking who not able to be here tonight,  
4 please do encourage them to make a comment during  
5 the additional comment period.

6 As we noted earlier, you can make a  
7 comment or ask a question or both. If there is  
8 something about this rulemaking that you have a  
9 question about, this is a good time to get that  
10 question onto the record as well.

11 And I think we'll leave the record open  
12 until about 5:00 to see if anybody is interested in  
13 making a comment and then we'll take another brief  
14 break.

15 MS. KAYLA BILLETT: Hi, Judge  
16 Palmer-Denig. We are also happy to monitor the chat  
17 and phone numbers if you prefer to turn your camera  
18 off or take a break, if needed.

19 JUDGE PALMER-DENIG: That's just fine. I  
20 figure I'm presiding from the bench and so it's my  
21 job to be here and be on camera and I'm happy to do  
22 that.

23 I do hope that someone else is interested  
24 in making a comment. I do also hope that folks who  
25 are not making a comment tonight or who were not

1       able to attend will go ahead and submit a written  
2       comment. We think that a robust rulemaking record  
3       is the very best way to ensure that Minnesotans get  
4       good governments from their agencies. So I am  
5       hoping that we still have some folks who step  
6       forward.

7               I know that some folks may have logged in  
8       and stepped away for a little bit. If you have  
9       stepped away for a bit and you've just come back,  
10      please note that we are looking for commenters to  
11      indicate an interest in speaking by putting their  
12      first and last names into the WebEx chat or by  
13      pressing \*3 on their phone.

14             We'll run until 5:00 and then we'll take  
15      another brief break. And we are, again, we're  
16      slated to run until 6:00, we will run until 6:00  
17      this evening and so I'm hopeful, you know, sometimes  
18      folks join a little bit later on a call, they  
19      couldn't get on the call right at 3:00 because, you  
20      know, they weren't off work yet. We're getting more  
21      into that time when people might be off work and  
22      able to join in so I want to make sure that we have  
23      an opportunity to address any comments that come up  
24      as we go along in the evening.

25             So if there is anybody who has joined and

1       you're wondering why we're all sitting here in  
2       silence, we are waiting for a commenter to indicate  
3       an interest in speaking. You can do that by putting  
4       your first and last names into the chat in WebEx, or  
5       if you are here by phone, press \*3. We're going to  
6       run on the record until 5:00 in the hopes that  
7       someone will indicate an interest in speaking. And  
8       if we do not receive another commenter by 5:00, or  
9       if we receive another comment, in the meantime we'll  
10      take that comment immediately, but if we don't have  
11      anybody in the queue as of 5:00, we're going to go  
12      ahead and take another 10-minute break.

13               So we're going to leave the record open  
14      for an another five minutes and then if we don't  
15      have anybody who has indicated an interest in  
16      commenting at 5:00 we're going to take a brief  
17      break.

18               If there is anybody who has just joined,  
19      we are in the public comments and questions section  
20      of our rulemaking hearing. If you are here by  
21      WebEx, please put your name into the chat box to  
22      request to speak, your first and last name, and  
23      we'll put you into the queue, or if you're here by  
24      phone, please press \*3 to indicate an interest in  
25      commenting. We're going to be around for about

1 another four minutes and then we'll take another  
2 10-minute break.

3 So we have just hit 5:00 and I am looking  
4 in the chat and I do not see another person who has  
5 indicated an interest in speaking. So we are going  
6 to go ahead and take another 10-minute break at this  
7 time. Let's actually go to 5:12, which is a very  
8 strange amount, just a little bit of extra time if  
9 you need to get a glass of water, so when we come  
10 back at 5:12, I'm hoping that we can convince some  
11 folks to make comments in WebEx in the chat box or  
12 by phone by pressing \*3.

13 We will return at 5:12.

14 Thank you.

15 (Break from 5:00 to 5:12.)

16 JUDGE PALMER-DENIG: All right. It is  
17 5:12 and that is the time that we said we would come  
18 back. We're back on the record.

19 I'm looking at the chat and I do not see  
20 that there's anyone who has indicated an interest in  
21 speaking.

22 If you are new to this call or to this  
23 WebEx, if you've just joined, I want to note that we  
24 are in the public questions and comment phase of the  
25 evening and that if you would like to make a public

1 comment you should put your first and last names  
2 into the chat function in WebEx. If you are here by  
3 phone you can press \*3 on your telephone to be added  
4 to the queue.

5 For anybody that is new to the call, we  
6 did have a couple of comments earlier this evening,  
7 we're slated to run until 6:00 p.m.

8 We have not had any comments in a while,  
9 and so I would encourage those of you who are still  
10 on the call or still on the WebEx session to go  
11 ahead and put your name into the chat or press \*3 to  
12 make a comment.

13 I'm going to run probably until 5:30,  
14 we'll see if we get anybody, and then we'll probably  
15 take another break, and we will conclude tonight's  
16 hearing at 6:00 p.m.

17 So for anybody who is new, anybody who  
18 has decided that they have an interest in making a  
19 comment, please go ahead and put your first and last  
20 names into the chat or press \*3 on your phone.

21 I'll also note, so it is 5:13, and some  
22 folks may be just getting off work around now, there  
23 might be some folks, because the hearing notice did  
24 indicate that we would be running until 6:00, it  
25 would be great if we had some folks join us here as

1       they're getting off of work, we're going to be  
2       monitoring the chat and monitoring the phone log and  
3       we will get folks queued up to make a comment as  
4       soon as we get someone who indicates an interest.

5               So it is now 5:20. I'm looking at the  
6       chat and we don't have anyone interested in speaking  
7       in the chat. We're going to run for another ten  
8       minutes before taking another break.

9               I'm just going to look and see, we do  
10      still have folks on the line, so if there's anybody  
11      who has decided they would like to make a comment or  
12      if there is anybody who is new to this proceeding,  
13      just got off work and has joined us, please go ahead  
14      and indicate an interest in making a comment by  
15      putting your first and last names into the WebEx  
16      chat, or by pressing \*3 on your telephone, if that  
17      is how you are here to make a comment.

18              Again, we'll run for about another ten  
19      minutes and then we'll take a brief break. And we  
20      are monitoring the chat looking for those of you who  
21      are interested in making a comment to go ahead and  
22      put your name into the chat so that you can take  
23      your comment.

24              So I have 5:30 on the clock and looking  
25      at the chat we do not have anyone who has indicated

1 an interest in speaking and so I am going to go  
2 ahead and put us on another brief break.

3 I'm actually going to give us a little  
4 bit of a longer break at this time because very soon  
5 at 6:00 we're going to close out the hearing. So if  
6 the court reporter or the MPCA has any preclosing  
7 activities that you need to do, I want to make sure  
8 that you have time to do that and sort of gather up  
9 your stuff and prepare to close up the hearing.

10 So we're going to come back at 5:45 and  
11 then we will run until 6:00 and close out the  
12 hearing then.

13 We don't have anybody in the chat now, if  
14 you have just joined and you decided that you would  
15 like to speak, putting your name in the chat while  
16 we're on the break, it's great, and we can take your  
17 comment right when we get back. And then otherwise  
18 we'll continue to be here to accept comments until  
19 6:00 p.m.

20 So we'll go on a break until 5:45.

21 (Break taken from 5:31 to 5:45.)

22 JUDGE PALMER-DENIG: We are back on the  
23 record.

24 It is 5:45 and we just had our final  
25 break of the evening.

1 I am looking at the chat and I'm not  
2 seeing any new commenters who have indicated an  
3 interest in making a comment.

4 If by chance you have just joined  
5 tonight, got off of work and decided to log in and  
6 see what was going on. If you would like to make a  
7 comment, you can do that. If you are here by WebEx,  
8 by putting your first and last names into the chat  
9 so we know that you would like to speak, or if you  
10 are here by phone, you can press \*3 to add yourself  
11 to the comment queue.

12 We have lost some folks over the course  
13 of the evening from the participant list, but I will  
14 note that we still have 17 people here so I'm  
15 hopeful we'll get maybe one more comment.

16 I will note also, especially for those of  
17 you who are -- if anybody has logged in and is a new  
18 participant, there will be a written comment period.  
19 You can file a comment with our office. I'll note  
20 not by email but with one of our other comment  
21 methods, which is eComments on our website which is  
22 the preferred method. Or by typically fax or  
23 U.S. mail, you will put the case number on that  
24 filing, whatever it is, you will file it into the  
25 eComments record for the case number or you add the

1 case number to your written comments. That case  
2 number is 71-9003-39354 and that is in the chat if  
3 folks want to pick it up.

4 So there will be a written comment period  
5 after this proceeding. The docket will open  
6 tomorrow on our eComment site that will run until  
7 March 19th, and then there will be a  
8 five-working-day or five-business-day rebuttal  
9 comment period in which folks can file comments that  
10 respond to other comments that have been made during  
11 the rulemaking. We had an initial comment period  
12 earlier that closed in January and so this will be a  
13 new comment period that will be after the rulemaking  
14 to ensure we have a robust rulemaking record.

15 For anybody who has been on the call  
16 tonight and is hesitant to make a comment, first I  
17 want to assure you that you are very welcome to make  
18 your comments tonight, but if not, if a written  
19 comment suits you better and if you think that  
20 that's a better way for you to make a comment,  
21 please do file your comment that way and I will look  
22 forward to reading it.

23 We are slated to run until 6:00. This is  
24 a great time if anybody would like to make a final  
25 comment of the evening to put your name into the

1 WebEx chat or to press \*3 on your telephone. What I  
2 will likely do is monitor the chat just as I have  
3 been doing this evening as we wait to see if we get  
4 another commenter. And then if we have not received  
5 another commenter by about five to 6:00, I will  
6 start offering some closing comments and then we  
7 will conclude the hearing at 6:00 p.m.

8 So anybody who is still on the line and  
9 wants to take a last opportunity to make a comment  
10 here tonight, I encourage you to do that. We are  
11 standing by in the hopes that someone will.

12 Again, if you are interested in making a  
13 comment, put your first and last names into the chat  
14 function in WebEx or press \*3 on your phone.

15 I'll also note that you can make a  
16 comment, you can also ask a question. If a question  
17 has come up for you as you've looked at things, and  
18 I'll note for anybody who is still on, if you have  
19 not looked at the chat recently, we do have a number  
20 of resources that have been posted in the chat. One  
21 of those is the link to the eComment site here at  
22 the Office of Administrative Hearings, and other  
23 information that has been posted into the chat is  
24 the link to the Air Toxics Emissions Reporting  
25 website that the PCA has put together, as well as

1 the exhibit list information. And then, again, the  
2 case number for the case, 71-9003-39354, is also  
3 some information that's been put into the chat.

4 So I'll note that I'm looking at the  
5 chat, right now it's 5:55, we have no one who is  
6 sitting in the chat waiting to speak. I'm going to  
7 go about another two minutes and see if we get any  
8 very, very last-minute commenter, and then about  
9 three till I'm going to offer some closing comments  
10 and then we will conclude the hearing at 6:00.

11 So last chance, folks, for those you who  
12 are still with us, and there are some folks who are  
13 still with us, I will ask if you want to be a  
14 last-minute commenter, please go ahead and raise  
15 that hand by putting your name, first and last name  
16 into the chat box of the WebEx online version, or  
17 you can press \*3 on your telephone if you are here  
18 by that version of participation. We will go just  
19 another minute and then we're going to close it out.

20 All right. Well, we are at T minus two  
21 minutes to 6:00 and so I'm going to begin the  
22 procedure of closing out the hearing. The hearing  
23 was noticed to last until 6:00 and we faithfully  
24 followed that in order to give the greatest  
25 opportunity for public comment that we possibly

1           could.

2                       I do want to offer my sincere  
3           appreciation to those folks who commented tonight,  
4           as well as all the folks who joined in to hear the  
5           presentation and to hear the comments and get more  
6           information about this rulemaking.

7                       I also send my appreciation to our court  
8           reporter this evening, Janet Shaddix, for being  
9           available for this hearing and for your services.

10                      And I also want to thank the folks at  
11           MPCA, not only those who made presentations and put  
12           together the PowerPoint, but also those who were  
13           behind the scenes working to make sure that the  
14           WebEx hearing ran smoothly. And I noted through the  
15           evening as I reviewed the list of participants,  
16           there were quite a number of folks from the agency  
17           who were here as participants to lend their support  
18           and their interest to the proceeding and so I want  
19           to thank all of the MPCA folks as well, regardless  
20           of your role.

21                      I do appreciate the MPCA's coordination  
22           with the Office of Administrative Hearings.  
23           Rulemaking hearings are not easy to put together and  
24           the MPCA does a really great job of doing the  
25           facilitation and the technical background work to

1 enable OAH to be able to do hearings in the way that  
2 it does and so I want to extend my sincere  
3 appreciation to the agency for all the work that you  
4 put in. I want to ensure that you know that it is  
5 recognized and that we really appreciate it.

6 So it is 5:59, I'm going to essentially  
7 call that 6:00 and I'm going to close out the  
8 proceeding.

9 I will note for anybody who is still on  
10 the line who is interested in filing a written  
11 comment, that written comment period will run until  
12 March 19th at 4:30. And then there is an additional  
13 extension of time, five-working-days, for rebuttal  
14 comments. We do prefer eFiled comments on our  
15 eComments site, but we certainly are happy to  
16 receive comments by mail, or by fax as well,  
17 typically is how those other comments get filed.

18 And I will note just for the record in  
19 case anybody needs it again that the case number for  
20 this rulemaking is how you access that eComment site  
21 and also the number that you need to put on your  
22 comment if you file it and that is 71-9003-39354.

23 All right. Any final comments from the  
24 MPCA tonight before we close it out?

25 MS. ADDISON OTTO: No, Your Honor,

1 nothing additional from us.

2 Thank you so much.

3 JUDGE PALMER-DENIG: All right. Thanks  
4 to everyone and we are adjourned. Take care and  
5 have a good rest of your evening.

6 (Proceeding concluded at 6:01 p.m.)

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1 STATE OF MINNESOTA)  
2 ) ss.  
3 COUNTY OF HENNEPIN)  
4  
5

6 REPORTER'S CERTIFICATE  
7  
8

9 I, Janet Shaddix Elling, do hereby  
10 certify that the above and foregoing transcript,  
11 consisting of the preceding 71 pages, is a  
12 correct transcript of my stenographic notes, and is  
13 a full, true and complete transcript of the  
14 proceedings to the best of my ability.

15 Dated March 9, 2025.  
16  
17  
18

19 /s/Janet Shaddix Elling

20 JANET SHADDIX ELLING  
21 Registered Professional Reporter  
22  
23  
24  
25

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