ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

PUBLIC HEARING

MAINTENANCE PLAN FOR THE ILLINOIS METRO-EAST ST. LOUIS OZONE NONATTAINMENT AREA FOR THE 2008 8-HOUR OZONE STANDARD

AND

THE ILLINOIS EPA CERTIFICATION OF EMISSIONS STATEMENT REQUIREMENT FOR THE 2008 OZONE NATIONAL AMBIENT AIR QUALITY STANDARD

Hearing conducted at the Conference Room at the Illinois Department of Transportation Regional Office, 1102 Eastport Plaza Drive, Collinsville, Illinois, commencing at 10:00 a.m. on September 14, 2016, before Erin M. Panzau, Certified Shorthand Reporter in and for the State of Illinois.

Illinois Certified Shorthand Reporter No. 084-004263 Missouri Certified Court Reporter No. 850(G)

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Hearing Panel

Mr. David "Buzz" Asselmeier,
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Mr. David E. Bloomberg,
Manager, Air Quality Planning Section,
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of Air;

Mr. Scott A. Leopold,
Environmental Protection Specialist, Bureau
of Air;

Mr. Dean Studer,
Hearing Officer, Right-to-Know Coordinator,
Office of Community Relations.

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2 | August 12, 2016, Illinois Register, Cover, Index and Relevant Pages | 10
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(Exhibits retained by the Hearing officer.)
HEARING OFFICER STUDER: We'll go ahead and begin. Good morning, my name is Dean Studer, and I'm the hearing officer for the Illinois EPA. This hearing is being held for the purpose of gathering public comments on the draft "Maintenance Plan for the Illinois Portion of the Metro-East St. Louis Ozone Nonattainment Area for the 2008 8-Hour Ozone Standard." We'll refer to this as just the Maintenance Plan; and we're also incorporating into this hearing comments are allowed on the "Illinois EPA Certification of Emissions Statement Requirement for the 2008 Ozone National Ambient Air Quality Standard." We'll refer to that as the Certification of Emissions Statement.

In the Maintenance Plan, Illinois EPA requests that the United States Environmental Protection Agency, USEPA, redesignate the Metro-East St. Louis Nonattainment Area to attainment of the 2008 8-Hour Ozone National Ambient Air Quality Standard, NAAQS, and sets forth additional information supporting redesignation. The Maintenance Plan also sets forth the State's plan for continued attainment...
of the 2008 ozone standard for the area for a period of at least ten years after USEPA formally redesignates the area.

The Certification of Emissions Statement contains verification that the Illinois EPA's current emission statement program, also known as the Annual Emissions Report, which was approved by USEPA into the Illinois State Implementation Plan, SIP, on May 15, 2002, that that remains in place for all Illinois areas designated nonattainment for the 2008 Ozone NAAQS and certifies that the existing emissions statement program meets the requirements of Section 182(a)(3)(B) of the federal Clean Air Act, 42 USC Section 7511a(a)(3)(a).

The Illinois EPA intends to submit the Maintenance Plan and the Certification of Emissions Statement to USEPA as a revision to the Illinois' State Implementation Plan, SIP, under the Clean Air Act, CAA, 42 USC Section 7401 et seq.

This hearing is being held under the provisions of the 35 Illinois Administrative Code 162, Procedures for Informational and Quasi-Legislative Public Hearings. Copies of these procedures can be accessed on the website for the Illinois Pollution

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Control Board at www.ipcb.state.il.us, or if you do not have ready access to the web, they can be obtained from me by request.

Illinois EPA staff present today will introduce themselves and make a brief presentation. Following this overview, I will allow the public to provide comments and ask questions. The Illinois EPA is also accepting written comments in this matter. Written comments are given the same consideration as comments made orally at this hearing and may be submitted to the agency at any time within the public comment period which ends on October 14, 2016. Any person who wants to make oral comments may do so as long as the statements are relevant to the issues that are addressed at this hearing and such person has indicated on the registration card that he or she would like to comment. If you have lengthy comments or questions, it might be helpful to submit them to me in writing before the close of the public comment period, and I will ensure that they are included in the hearing record as an exhibit.

Please keep your comments and questions relevant to the issues at hand. If your comments fall outside the scope of this hearing, I may ask you to
proceed to another issue. All comments made during
the hearing or submitted in writing during the comment
period will become part of the official hearing record
and will be considered by the Illinois EPA. Cards are
available at the registration table, and you can fill
out a card if you have not already done so and
indicate if you would like to comment today. Anyone
who legibly completes a card or submits written
comments before the close of the comment period will
be notified by the Illinois EPA when the final
decision in this matter is reached. That notification
will also contain information as to how you may access
the agency responsiveness summary. In this summary,
Illinois EPA will respond to all relevant and
significant issues raised at this hearing or submitted
in hearing prior to the close of the comment period.

Again, the written record in this
matter will close on October 14, 2016. Therefore, all
written comments will be accepted as long as they are
physically received by Illinois EPA headquarters in
Springfield on or before October 14, 2016. During the
comment period, all relevant comments, documents, and
data will be placed into the hearing record as
exhibits. Please send all written documents or data

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to Dean Studer. That's D-e-a-n. Last name is spelled S-t-u-d-e-r, Office of Community Relations, Mail Code No. 5, Regarding Metro-East Ozone Attainment Status, Illinois Environmental Protection Agency, 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276. This address is also listed on the public notice for the hearing today.

A court reporter is here today taking a verbatim record of these proceedings for our administrative record. For her benefit, please keep the general background noise in this room to a minimum so that she can hear everything that is said. I will make arrangements to have the transcript of this hearing posted on the Illinois EPA web page for this proceeding.

While the issues raised today may indeed be heartfelt concerns to many of us in attendance, applause and other disruptive noises are not appropriate during the course of this hearing.

Secondly, I ask that issues raised relate to the ozone attainment status in the Metro-East area or the Certification of Emissions Statement. Statements and comments that are of a personal nature or reflect on the character or motive
of a person or group of people are not appropriate in
this hearing. If statements or comments begin to
drift into this area or begin to drift away from the
issues involved with the attainment demonstration or
Certification of Emissions Statement, I may interrupt
the person speaking and ask that they proceed to the
next relevant issue.

As hearing officer, I intend to treat
everyone here today in a respectful and professional
manner as will the Agency staff here today. I ask
that members of the public do the same. If the
conduct of persons attending this hearing should
become unruly, I am authorized to adjourn this hearing
should such actions warrant. In such a case, Illinois
EPA would accept written comments through the close of
the comment period.

We do have a limited time in which to
conduct this hearing and are here to listen to
relevant issues associated with the attainment
demonstration and the emissions statement. You may
disagree with or object to some of the statements and
comments made today, but this is a public hearing and
everyone has a right to express their comments in this
matter.
When it is your turn to speak, please speak loudly, state your name and, if applicable, any governmental body, organization, or association you represent. If you are representing yourself, you can state that you are an interested citizen or just a member of the public. Also, for the benefit of the court reporter, please spell your last name. If there are alternate spellings of your first name, you may also spell your first name. Please speak loudly and clearly so that an accurate record of your comments can be made and everyone in the room can hear you.

People who have requested to speak will be called upon in the order they have registered unless they have other arrangements with the hearing officer.

Before we start with the Illinois EPA presentation, I'd like to record preliminary documents into the official record as exhibits. For the record, Exhibit No. 1 is a copy of the Notice of Public Information. Exhibit No. 2 contains the cover, index, and pages of the August 12, 2016, Illinois Register where the notice of public information was published. Exhibit 3 is the Maintenance Plan for the Illinois portion of the Metro-East St. Louis Ozone Nonattainment Area for the 2008 8-Hour Ozone Standard.

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AQPSTR 16-05, July 2016; and, finally, Exhibit 4 is a
draft undated letter addressed to Acting Regional
Director Kaplan, that's K-a-p-l-a-n, from the Acting
Director of the Illinois EPA. Other documents may be
entered into the hearing record as we progress today.

Are there questions as to how I will
conduct this hearing?

Okay. Let the record indicate that no one
raised their hand.

With that, I will have EPA staff with
me present today introduce themselves.

MR. ASSELMEIER: My name is David
Asselmeier. I go by the nickname of Buzz. I am the
Inventory and Data Support Unit Manager in the Air
Quality Planning Section of the Bureau of Air and work
for David Bloomberg.

MR. BLOOMBERG: I am David Bloomberg. I am
the Manager of the Air Quality Planning Section in the
Bureau of Air, the Illinois EPA.

MR. LEOPOLD: I am Scott Leopold. I am a
Meteorologist and Photo Chemical Modeler in the Air
Quality Planning Section, and I work for David
Bloomberg.

HEARING OFFICER STUDER: And with that,
Scott, why don't you start on the presentation.

MR. LEOPOLD: Thank you, Dean.

Good morning. I am here to present information about the maintenance plan for the 2008 8-Hour Ozone Standard, which is 0.075 parts per million, which is equivalent to 75 parts per billion. The reason we have a maintenance plan is because it is a requirement to redesignate to attainment. Four requirements are posted here. The NAAQS for ozone has to be attained, which we have done, and I will be presenting a slide shortly that will illustrate that, and the third bullet indicates that a maintenance plan has to be approved, and that is part of what I am presenting information on today.

Next slide, please. Within the Maintenance Plan, we must have the following things: Comprehensive emissions inventory of precursors of ozone for the attainment year, a projection of the inventory to at least ten years after redesignation, we have to comment to operating an appropriate monitoring network, we have to have the legal authority, we have to have an emissions statement from major sources submitted annually, we have to have a motor vehicle emissions budgets for transportation.
conformity for that same ten-year maintenance period, and we have to have a commitment to revise the maintenance plan as necessary eight years after the redesignation.

Next slide, please. The nonattainment area we are addressing today is the Metro-East part of the entire St. Louis ozone nonattainment area. The counties included on the Illinois side are Madison, St. Clair, and Monroe Counties.

Next slide, please. This illustrates the monitoring network within the St. Louis region showing that there are a substantial number of monitors both within the nonattainment area and near the nonattainment area.

Next slide, please. This shows the design values in parts per billion from the 2010 to 2012 period. This is the time frame in which we were first designated as nonattainment. In this time period, we had a number of monitors that were over the 75 part per billion standard with a maximum design value of 86 parts per billion at the West Alton, Missouri, monitor.

Next slide, please. And this shows the design values for the three most current full years of
data, and that is 2013 to 2015, and all of the
monitors in and near the nonattainment area are now
attaining the standard. The maximum value of design
value at this -- for this three-year period is 71
parts per billion.

Next slide, please. This represents an
analysis that was done for us by the Lake Michigan Air
Directors Consortium, or LADCO, and it's a complicated
statistical analysis that normalizes the
concentrations to specific types of weather
conditions; that is, each of these lines represents
ozone concentrations over a 16-year period for similar
weather conditions. What this analysis does is to
assess whether ozone concentrations are going down as
a result of emissions reductions or whether they are
meteorologically related; and since these lines are
all going downward over this period with similar
meteorological conditions, we can say that ozone
concentrations in the Metro-East area are decreasing
because of emission reductions.

Next slide, please. And now
Mr. Asselmeier will address the emissions inventory
and conformity portion.

MR. ASSELMEIER: Next side, please. Scott
indicated in one of the other parts is we have to put together a maintenance emissions inventory, and that has to be for one of the years that we used for the monitoring data that we were in attainment, so we used the 2014 year for the base year inventory. What the inventory includes is practically everything that emits in the area, which we'll classify into four major areas.

First being point sources. You can think of those as the big industries, companies, things like that. Where we get our data from them is through annual emission reporting, maybe some existing data if they have applied -- you know, permit applications, things like that.

Area sources can be the small, little industries if you think of -- rather than permit every single dry cleaner out there, we can treat them as a group. It can be personal products. It can be agricultural pesticide application. Again, things you're not really permitting but affect a lot -- that are a lot in number. Typically, how we calculate emissions for those, there are standard emission factors, and what those do is relate some activity. It could be population, it could be employment, amount
of fuel burned; and by that factor, it will say you can calculate emissions.

    We also have on-road motor vehicle emissions: Cars, trucks, motorcycles you're all familiar with. That -- the emissions from those are calculated using a computer program provided by USEPA called MOVES, and this version was the 2014 and was actually 2014-A is what we used.

    We also inventory off-road motor vehicles, again, tractors, combines -- it doesn't apply for the ozone season, but snowmobiles, lawn mowers, things of that nature. Those are also calculated using the MOVES model. The MOVES model does not calculate that other category for locomotives, commercial marine vessels, you know, barges on the river, and aircraft. There are other methods and other studies and emission factors that we use to calculate those emissions.

    Next slide. So that was the 2014 base year inventory. For the maintenance inventory, we have to do an inventory that is at least ten years in the future, and ten years is the requirement through this, but the little, I'll say, twist on that is ten years after USEPA approves our redesignation request.
So not knowing when they're actually going to approve it, we have projected all the way out to 2030. And how you do that is what we -- kind of simple term we use, we say we grow the inventory. Now, grow in some cases means emissions increase. Growth can also be negative. There may be new regulations coming in future years. There may be companies shutting down. There may be types of businesses that we envision or didn't envision that are coming in. So these growth factors are, basically, economic-based, population, the new regulations, and shutdowns.

Where we receive this mainly for this case was that USEPA had produced growth factors and had done their projections for their ozone transport modeling, and that was made available through their NODA, which is N-O-D-A, which is Notice of Data Availability for this project. So for our point and area sources we used those growth factors or that growth methodology from that project. That project only projected out until 2025, so we use the same growth rate as what they had from roughly 2020 to 2025 and kept on projecting at the same rate to 2030. Some of the things they were using and their predictions,

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we may not have agreed with completely, more in the realm of power plants, of what may shut down, what fuels they may be switching to. So we did not always use their cases of what they thought was going to happen.

For the St. Louis area, which is what we're talking about, we didn't really have any problems. That ran more into the Chicago nonattainment area. For the on-road and off-road motor vehicle sources, we used the MOVES model to run and use the future years on that; and, hopefully, when we do this growth, the future year is less than the base year, and that makes everybody happy, and you can proceed on the redesignation request.

So next slide. So what I have here is what we have projected from our base year, of course, on the left all the way up to 2030 on the right, and so that is for nitrogen oxide emissions, and we usually express this in terms of tons per day. Again, we're worried about hot summer days, not the full annual year.

Next slide. And then, also, we had the same thing here for volatile organic material, VOM, which again shows yes. So what we have here is
emissions are going down.

Okay, next slide. Now, as part of the redesignation request, you have to set the budgets for conformity, and that is for on-road motor vehicles; and what conformity is, is Clean Air Act requirement, and it is meant to also cover cases where federal transportation or other projects like that may impact or affect against -- it could be positive; it could be negative -- against what the State EPA is doing. So what we are doing in this case is with our predictions of our -- of what the emissions could be in 2030, that effectively sets a cap on what the future emissions could be or are to be in the St. Louis nonattainment area, Metro-East nonattainment area in the future. So that is where we also have to work with East-West Gateway, other entities like that, to make sure that if for some reason maybe, you know, we're putting in -- the feds are putting in new interstate or expanding lanes or doing something that may affect increase in emissions, that affects our maintenance plan, so we want to make sure that things that any of the federal government is doing does not affect our maintenance plan.

Next page, next slide. So in that
case, we have been working together with the East-West Gateway in our consultation meetings. We've exchanged data on inputs into the MOVES model. We both run the MOVES model. We do not necessarily come up with the same results. That's neither good nor bad. They have access to much more detailed data and transportation plans and designs, and that we don't have, and that we don't usually typically worry about. So if there's any huge differences, we try to work these out with consultation meetings, with exchange of data, well, what did you use for this value, that value, so on and so forth; but, nonetheless, we will not agree 100 percent; so what we do is we apply a safety margin; and so, hopefully, we still have decreases in emissions that we can give a little bit of a buffer to the on-road portion of the inventory and the maintenance plan that can account for unforeseen changes or any differences we've had before.

Next slide. So what we have done, the safety margin is what we have called it, that is the difference between the 2014 and the 2013 (sic) values of the inventory, and what we did is we just took a percentage of that amount, and we took different percentages for each pollutant. In this case we used
50 percent for NOx, 40 percent for VOM, and we added that to the emissions inventory, to the maintenance plan. So, again, we want to have some available for on-road to grow in that time and make sure the numbers will not affect our maintenance plan. So, again, what we originally started with, again, for VOM, for example, in 2030 was 3.75 tons per day, we added in a safety margin of 5.3, so now we're saying the budget is 9.05 tons per day. Same calculation methodology for NOx.

So next page. So what we've come up with is now you've heard me talk about point, area, on-road, and off-road. For this slide, I have now added in that little safety margin. So, as you can see for the left two columns for NOx, certainly 2030 is still very much under the 2014 value, so we are good there; and for -- also for VOM, on the right two columns, we are still even with that safety margin, still very much under the 2014 value for our future year. So, again, we are saying yes, we can live with what conformity numbers we have put in there and the budgets and they still meet our maintenance requirements for the inventory, and that is all I had on the inventory and growth.
The other thing we are here for is for also to recertify the emissions certification, and we call that the Annual Emissions Report. It's a federal requirement that we certify that we have this. Our current annual emission reporting rule, a requirement we've had for many years, the first year was 1993, so it's been going on.

The current requirement is that every source that is either subject to Title 5, the Title 5 permitting requirement, the -- has total allowable emissions of over 25 tons per year, or that is in an ozone nonattainment area and has potential emissions of NOx or VOM over 25 tons per year has to fill out what we call the long annual maintenance report form, and that is one that report plant totals, hours of operation, detail on every emission unit they have. That also includes ozone season emissions. We use peak ozone season: June, July, and August. Again, that is part of the SIP, part of the administrative reporting requirement. USEPA expects us to have that in there. We are a little bit more -- our requirement is a little bit more stringent than what USEPA requires. They are more for the nonattainment areas only where they require this. Our statute for the
annual emissions reporting rule applies this to the
full state; and, again, we are not proposing to change
any of that. Our current rule and regulation meets
the requirements of USEPA for both the Chicago and the
Metro-East nonattainment areas, and so we are going
with that, but because of what the redesignation has
to include, we are including this along with the
redesignation. Again, the rule is not changing. It's
just we have to include this with the redesignation,
and I believe that is all I have. Okay.

HEARING OFFICER STUDER: All right. With
that, I'll go ahead and open it up for questions. I
believe the first person that had indicated they may
have questions was Brenda Carter.

MS. CARTER: I do not have any questions at
this time.

HEARING OFFICER STUDER: And for the record,
it's the normal spelling of Carter.

Brad Sims.

MR. Sims: I'm Brad Sims, that's S-i-m-s. It should be a simple question. Who is the East-West
Gateway?

MR. BLOOMBERG: It is the East-West Gateway
Council of Governments, and it is an organization,
they are based in St. Louis, but they cover both the
Illinois and Missouri side. They work with the
Illinois government, the Missouri government, many
local governments. They have many goals. In
particular, though, related to this proceeding, they
are the organization that handles conformity,
transportation conformity.

MR. SIMS: Thank you. No more questions.

HEARING OFFICER STUDER: Okay. Is there
anyone else in the room that had questions if they
would like to present or ask?

Nope?

MS. FRENCH: I do, actually. I'm kind of
curious what --

HEARING OFFICER STUDER: Okay. Can you
give your name and spell it.

MS. FRENCH: I'm sorry. Dana French, normal
spelling, D-a-n-a, French.

My question is, I guess, just if you
can explain a little bit what some of the assumptions
were in how the NOx emissions are going to go down, if
it was mostly mobile reductions due to standards that
are coming for mobile sources or if it's more pointed
towards stationary sources.
MR. ASSELMEIER: For the most part -- and I brought up the NOx slide there again, so the bottom point, the blue line, would be the point sources, the industry, companies, things like that. You can certainly see a decrease between 2014 and 2020; and, yes, that is where we have accounted for the shutdown of the Wood River power plant.

MS. FRENCH: And that's the big one?

MR. ASSELMEIER: That's the big -- well, in certainly the point source, the big one. I don't have the exact numbers, but you can see 2020, 2030 kind of --

MS. FRENCH: Pretty far out.

MR. ASSELMEIER: -- for point source pretty close to the same, but, again, that's the big source in the area. What USEPA did with that ozone study, most of their data had just, I'll say, normal point source, not growing much or at all. They had more for fuel combustion, they may have had some growth, so, again, maybe a little bit with refineries and engines and boilers of that nature. Area source doesn't usually typically emit a lot of NOx, so you're not really going to see much change there. Where you do see a lot of the NOx reductions are on the on-road and
off-road. Again, with different fleet standards coming in, car, truck turnover, any new standards that the federal government has implemented or will be implementing, that is where you're going to see a lot of those reductions come from. I do not believe, and I don't remember anything from any other additional rules we had proposed or coming or --

MR. BLOOMBERG: There are no state rules that would particularly impact on the books, nothing planned -- that's not entirely true. We have NOx RACT rules that did. The compliance date was 2015, so there is some reduction in industrial NOx at that point. I forgot the start of the 2014 there.

MR. ASSELMEIER: Right, but, again, depending upon some of that, we may not necessarily always include all the reductions in our projections if we're -- I mean, as you can see, we're meeting the required NOx reductions by a huge amount, so we don't want to get in a case where we're cutting down very fine detail or limiting ourselves. We want to have some room for growth if there is some new project or plant that comes into this area in 2020, 2030 that we didn't plan for. We would still want to have some room for growth that we don't handcuff ourself.
MR. BLOOMBERG: But I think the short summary answer, the shorter summary answer to what you're asking is I think it's mostly on-road.

HEARING OFFICER STUDER: For the record, David, it was NOx Red, NOx reduction?

MR. BLOOMBERG: NOx RACT, R-A-C-T, which is Reasonably Available Control Technology.

HEARING OFFICER STUDER: Any other questions or comments?

MR. SIMS: Brad Sims again, S-i-m-s. On the next slide, I think it was, the VOC emissions.

MR. ASSELMEIER: Yes.

MR. SIMS: VOM.

MR. ASSELMEIER: Yeah.

MR. SIMS: Can you talk a little bit about on-road and things like E15 fuels. Are those part of this modeling? Is there anything assumed as far as emission impacts from that?

MR. ASSELMEIER: I do not know off the top of my head. I do not run the MOVES model, and I am generally familiar with it, but that is something I'd have to check on. I'm, again, not completely sure, but I think for the 2014 version of MOVES, they may
have included the ability for E15, but I am not -- I will have to check on that. Certainly E85, electric vehicles are in there.

MR. BLOOMBERG: I suspect the largest reason for the reduction is the Tier 3 vehicle standards.

HEARING OFFICER STUDER: For the record, before this is submitted to USEPA or at the same time this is submitted to USEPA, we will have a responsiveness summary and will respond to that issue in the responsiveness summary is how these are handled when there is no answer -- definitive answer given at the hearing.

Any other questions or comments?

All right. I thank you for your attendance, and I thank you for being here today. This hearing is adjourned, and I remind everyone that the comment period will remain open for written comments through the 14th of October. Thank you.

(Whereupon the hearing was concluded.)
CERTIFICATE

I, Erin M. Panzau, CSR, RPR, and Notary Public duly commissioned and qualified in and for the County of Madison, State of Illinois, DO HEREBY CERTIFY that the foregoing proceedings, consisting of pages 1 through 29 inclusive, was reported by me in machine shorthand and transcribed by me and is a true and accurate transcript of the proceedings held at Regional Conference Room at the Illinois Department of Transportation Regional Office, 1102 Eastport Plaza Drive, Collinsville, Illinois, on September 14, 2016.

I hereby certify that I am not of counsel, not related to counsel or the parties hereto and am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have set my hand and affixed my Notarial Seal on September 14, 2016.

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