

BEFORE THE ENVIRONMENTAL PROTECTION APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.

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In re: :
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DOW CHEMICAL COMPANY : RCRA Appeal No. 06-01
HANGING ROCK PLANT, :
 :
Permit No. OHD039-128-913 :
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Washington, D.C.
Tuesday, August 12, 2008

The above-entitled matter came on
for TELECONFERENCE at approximately 11:00
a.m. at 1140 Connecticut Avenue, NW,
Washington, D.C.

BEFORE:

CHARLES SHEEHAN
Presiding Judge

NIVEA BERRIOS
Senior Counsel to the Board

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<p>1 APPEARANCES: 2 On behalf of PPG Industries Ohio, Inc.: 3 ROBERT J. SCHMIDT, ESQUIRE Porter Wright Morris & Arthur 4 41 South High Street Columbus, Ohio 43215 5 (614) 227-2028 6 On behalf of Environmental Protection Agency: 7 KEVIN C. CHOW, ESQUIRE Office of General Counsel 8 U.S. EPA Region 5 77 West Jackson Boulevard 9 Chicago, Illinois 60604 (312) 886-0562 10 11 ALSO PRESENT: 12 Eurika Durr 13 Mark Mahoney 14 * * * * * 15 16 17 18 19 20 21 22</p>	<p>1 I outlined a few questions in that 2 order. Maybe turn right to those first, 3 asking Mr. Chow to go -- to respond 4 initially. First, why does Ohio have to get 5 involved in the certification at this point, 6 if you've already represented that Ohio, 7 contrary to what you said earlier, is no 8 longer going to be involved as the permitting 9 authority? What role do they play at this 10 point if they're no longer involved in the 11 permit? 12 MR. CHOW: I guess what you've got to 13 understand is that the -- actually, the parties 14 were on this kind of simultaneous track for 15 terminating the appeal. One was the comparable 16 fuels demonstration that I was proceeding with. 17 The other possibility was -- you know, now that 18 Ohio has been authorized to issue BIF permits, 19 to actually issue a BIF permit, making EPA's 20 permit unnecessary. 21 So a few months ago, I guess, when 22 this all came up as possibilities -- nobody</p>
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<p>1 PROCEEDINGS 2 MS. DURR: The Environmental Appeals 3 Board of the United States Environmental 4 Protection Agency is now in session for a 5 teleconference in re: the Dow Chemical Company 6 Hanging Rock Plant, Permit No. OHD039-128-913; 7 RCRA Appeal No. 06-01, the Honorable Judge 8 Charles Sheehan presiding. 9 JUDGE SHEEHAN: Good morning. This is 10 Judge Sheehan, and with me is Nivea Berrios, our 11 senior attorney on the case. 12 As the order of August 6 indicates, 13 I'd like to talk with you all today about the 14 timing here. I begin with the -- shall we 15 say discomfort with the fact that this case 16 has gone on over 2 years now, it's look like 17 it's heading into at least 2-1/2 years at 18 this point. 19 So I'd like to understand why the 20 delay, and whether or not we need to get on 21 with briefing this case and having oral 22 argument.</p>	<p>1 knew which one would proceed faster, so we 2 decided, well, let's request the AB to -- for 3 more time to let both of them proceed. 4 But as Dow proceeded with the 5 comparable fuels demonstration, and as Ohio 6 EPA started to draft up and review a state 7 BIF permit, I think Dow determined that it 8 was making such good progress with its 9 comparable fuels demonstration, with Ohio 10 EPA's review on participation, that Ohio 11 decided that, since the comparable fuels 12 demonstration would be the most likely thing 13 to occur, that it would not be appropriate 14 use of their resources to issue a state 15 permit which would then be rendered moot 16 because of the comparable fuels 17 demonstration. 18 My understanding is that the 19 comparable fuels demonstration was just going 20 to proceed anyway as a result of the joint 21 venture between Dow and Chevron. That's just 22 a business decision that they made. So Ohio</p>

6	<p>1 just told us maybe a month ago that they were</p> <p>2 not going to be issuing a state-issued</p> <p>3 permit. So that's kind of the -- that's the</p> <p>4 reason why they're not issuing a state BIF</p> <p>5 permit.</p> <p>6 JUDGE SHEEHAN: I think I get that,</p> <p>7 but I don't understand why if they're not</p> <p>8 issuing the permit they need to issue the clean</p> <p>9 closure certification.</p> <p>10 MR. CHOW: That's a result of the</p> <p>11 comparable fuels demonstration. Once -- my</p> <p>12 understanding of the process is -- and Rob can</p> <p>13 properly explain this a little bit more than I</p> <p>14 can -- that once the comparable fuels</p> <p>15 demonstration is made and Dow conducts its clean</p> <p>16 closure on a couple of units, that Dow would be</p> <p>17 preparing a report, mailing it to Ohio, and then</p> <p>18 Ohio would be reviewing it and -- you know,</p> <p>19 accepting or rejecting the results of this</p> <p>20 report.</p> <p>21 And that's the clean closure</p> <p>22 certification that would give Dow the</p>	8
7	<p>1 certainty and closure that it needs to</p> <p>2 make -- to have a successful comparable fuels</p> <p>3 demonstration.</p> <p>4 JUDGE SHEEHAN: Given the slow pace in</p> <p>5 this case at this point, it sounds like that's a</p> <p>6 recipe for multiple months more time; right?</p> <p>7 MR. CHOW: We've talked to Ohio EPA</p> <p>8 about exactly how long it would take for them to</p> <p>9 review these clean closure reports, and they</p> <p>10 could not give us a specific timeline or a</p> <p>11 particular date, but I think the Ohio EPA staff</p> <p>12 members said, maybe it'll take us a couple of</p> <p>13 weeks. But they could not commit it to any</p> <p>14 particular time frame.</p> <p>15 That's kind of the -- that's the</p> <p>16 source of some uncertainty on our part as</p> <p>17 to -- I mean, Rob and I were trying to figure</p> <p>18 out how much time should we ask. We have no</p> <p>19 idea how long Ohio EPA will take other than</p> <p>20 Ohio -- a low-level Ohio EPA staffer said,</p> <p>21 well, maybe it'll take us a couple of weeks.</p> <p>22 So taking them at their word, and</p>	9
6	<p>1 building in a little extra time, we decided</p> <p>2 that November 21st would be an appropriate</p> <p>3 time.</p> <p>4 MR. SCHMIDT: I think --</p> <p>5 JUDGE SHEEHAN: So --</p> <p>6 MR. SCHMIDT: I'm sorry.</p> <p>7 JUDGE SHEEHAN: Is that Mr. Schmidt?</p> <p>8 MR. SCHMIDT: Yes, Your Honor. I</p> <p>9 wanted to offer another point on this, and that</p> <p>10 is -- due to the uncertainty with Ohio EPA, when</p> <p>11 Kevin and I were discussing the timeline, that</p> <p>12 is when we discussed alternatives to a permanent</p> <p>13 modification at the federal level, and</p> <p>14 terminating this appeal before going through</p> <p>15 that process.</p> <p>16 We're faced with Ohio EPA having</p> <p>17 final say on the closure of the unit, both</p> <p>18 because of delegations and because of the</p> <p>19 comparable fuels demonstration that's</p> <p>20 currently being made.</p> <p>21 But once we get that certification</p> <p>22 of clean closure from Ohio EPA -- and I will</p>	8
7	<p>1 also convey that I have relayed to Ohio EPA's</p> <p>2 legal counsel that this is a decision that</p> <p>3 needs to be made in short order because of</p> <p>4 this appeal and because of trying to resolve</p> <p>5 federal permitting issues. He understood</p> <p>6 that and did commit to making his best</p> <p>7 efforts to resolve or to ensure the closure</p> <p>8 certification.</p> <p>9 I guess what we were talking about,</p> <p>10 Kevin and I, was the possibility of finding a</p> <p>11 way to resolve this appeal after closure was</p> <p>12 certified by Ohio EPA but before we go</p> <p>13 through the modification process at the</p> <p>14 federal level to remove the BIF permit</p> <p>15 conditions.</p> <p>16 I think that's something that I've</p> <p>17 convinced my client is the most appropriate</p> <p>18 thing to do rather than wait for a permanent</p> <p>19 modification to go through.</p> <p>20 So we've tried our best to reduce</p> <p>21 the timeline for concluding this appeal,</p> <p>22 taking into account the uncertainty presented</p>	9

10	<p>1 by Ohio EPA's decision-making process -- by</p> <p>2 reaching an agreement that we will withdraw</p> <p>3 this appeal as soon as that certification is</p> <p>4 confirmed, and as soon as the agency confirms</p> <p>5 that it does not consider us subject to the</p> <p>6 BIF permit anymore, and then we will wrap up</p> <p>7 the permanent modification that is necessary</p> <p>8 to remove the BIF permit after we withdraw</p> <p>9 the appeal.</p> <p>10 And that was our best effort to try</p> <p>11 and reduce the timeline, understanding that</p> <p>12 everybody wants to get this matter resolved.</p> <p>13 JUDGE SHEEHAN: So you'd withdraw the</p> <p>14 appeal when the certification is approved, but</p> <p>15 when the certification is approved is anyone's</p> <p>16 guess.</p> <p>17 MR. SCHMIDT: I guess I would say it's</p> <p>18 not a question of multiple, multiple months, but</p> <p>19 Ohio EPA didn't want to give us a definitive</p> <p>20 answer on how long it would take them to review</p> <p>21 the closure.</p> <p>22 JUDGE SHEEHAN: When are you going to</p>	12	<p>1 from that tank -- sludge and other materials,</p> <p>2 as well as allowing us to continue to work on</p> <p>3 the second product line.</p> <p>4 The second product line has already</p> <p>5 been cleaned. We cannot properly test it</p> <p>6 yet. We should have that testing done in</p> <p>7 September for -- to allow us to submit to</p> <p>8 Ohio EPA by the end of September the closure</p> <p>9 certification request. That's the timeline.</p> <p>10 So within the next -- assuming</p> <p>11 nothing goes wrong with the testing of</p> <p>12 sampling, that indicates we have a problem</p> <p>13 with the -- that we need to more cleaning for</p> <p>14 closure, within the next six to eight weeks,</p> <p>15 Ohio EPA should have that information.</p> <p>16 JUDGE SHEEHAN: And then begins the</p> <p>17 uncertain period?</p> <p>18 MR. SCHMIDT: Correct. That begins</p> <p>19 the uncertainty associated with their review,</p> <p>20 but again, if we get the certification reports</p> <p>21 to them by the end of September, perhaps early</p> <p>22 October, we would -- again, this is a -- Kevin</p>
11	<p>1 get the final information on the fuel</p> <p>2 demonstration to Ohio?</p> <p>3 MR. SCHMIDT: We are working -- well,</p> <p>4 let's see, we've completed -- to give you a</p> <p>5 quick thumbnail overview -- the boiler that was</p> <p>6 subject to the RCRA permit in this case has two</p> <p>7 product lines that generate waste that are mixed</p> <p>8 in a tank and then sent to the boiler for</p> <p>9 burning. One of the process lines has already</p> <p>10 been cleaned and tested and sampled and meets</p> <p>11 the comparable fuels demonstration.</p> <p>12 That line, we could -- essentially</p> <p>13 there are three things that we have to</p> <p>14 certify as clean for purposes of closing this</p> <p>15 unit. The second item is the tank. It's</p> <p>16 called the R-35 tank. It's a mixing tank</p> <p>17 basically for the two products -- or the</p> <p>18 waste from the two product lines. That tank</p> <p>19 is scheduled to be taken out of service and</p> <p>20 cleaned within the next two weeks.</p> <p>21 We have to get a temporary tank on</p> <p>22 site to allow us to accumulate any materials</p>	13	<p>1 and I were looking at the possibility of them</p> <p>2 taking anywhere from four to six weeks to</p> <p>3 review.</p> <p>4 If they certify it within that</p> <p>5 period of time, I'm assuming the region would</p> <p>6 be able to provide us with notification that</p> <p>7 they no longer consider us subject to the BIF</p> <p>8 portions of the permit, and we can at that</p> <p>9 point withdraw the appeal. So again, that's</p> <p>10 why the November 21st date that we proposed</p> <p>11 was kind of how we reached the timeline for</p> <p>12 resolving this matter.</p> <p>13 JUDGE SHEEHAN: By the way, I'll ask</p> <p>14 Ms. Berrios to jump in here if she has any</p> <p>15 questions. I should have said that at the</p> <p>16 outset.</p> <p>17 MR. CHOW: Judge, the letter that EPA</p> <p>18 is writing, it's more of a -- I characterize it</p> <p>19 more as a comfort letter than anything. I think</p> <p>20 Dow just wanted some assurances that EPA would</p> <p>21 consider the appeal and the permit, at least of</p> <p>22 their portions to be moved after the clean</p>

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1 closure certification. EPA is agreeable to
2 doing that. And that is not a difficult letter
3 to write.
4 JUDGE SHEEHAN: Okay. But getting
5 back to Ohio for a moment, I am not
6 understanding why it is that at this point, with
7 a lot of energy invested into this case and with
8 the permit issues, you're still unable to get
9 any better guarantee from Ohio about their
10 timeline than some -- as you put it -- a
11 "low-level staffer."
12 Why can't you get somebody at a
13 management level to commit for Ohio -- we'll
14 turn it around within two weeks or something
15 like that rather than just go into this
16 uncertain cloudy mode of a low-level person
17 giving you a vague representation and you've
18 got nothing better than that.
19 Why can't you get higher-level
20 people in the state to give you more comfort
21 than that?
22 MR. CHOW: I suppose we could talk to

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1 some managers over there and see if there's any
2 way they can maybe clear the schedules of their
3 staffers or something, but yeah, we could try
4 doing that --
5 MR. SCHMIDT: Your Honor, I will offer
6 an observation based on practicing in Ohio for
7 the last decade or so -- we can try that and
8 certainly a request from U.S. EPA to Ohio EPA
9 for assistance in making sure that this is a
10 high priority for the people that need to make
11 the decision will certainly be something that
12 Ohio EPA will listen to.
13 I have in my experience not found
14 them willing to set deadlines for themselves
15 in any matter. I would think a joint request
16 would be something that they will look
17 favorably on, but I would -- in my
18 experience, it's unlikely that we would get
19 an actual definitive statement that they will
20 take action by a certain date.
21 I would hope that they would give
22 that to the Region V, but in my experience,

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1 they're going to want to leave themselves
2 wiggle-room in case somebody is unable to
3 reach a decision within that period of time.
4 I want to try.
5 MR. CHOW: I know. I'm certainly
6 willing to.
7 JUDGE SHEEHAN: I understand that they
8 probably can't certify absolutely that they can
9 turn it around in X number of days or weeks, but
10 it is troubling that you're going on a low-level
11 person's date representations at a time 2-1/2
12 years down the pike when this case should have
13 been done by now, much less being it another
14 sort of beginning stage or another cycle here.
15 It's not very reassuring to think you're still
16 not getting much out of Ohio, or not even
17 getting any kind of higher-level commitment to
18 try.
19 MR. SCHMIDT: I would -- this is Rob
20 Schmidt again -- I can certainly commit to
21 making an effort to get higher-level managers at
22 Ohio EPA to try to move this as expeditiously as

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1 possible. I will certainly do that.
2 MR. CHOW: EPA will make contact as
3 well.
4 JUDGE SHEEHAN: Mr. Chow, would you
5 have any objection if this was not wrapped up in
6 the sense of the appeal being withdrawn
7 by -- say the November 21st date that I think is
8 now on the table -- that Region V be directed to
9 file its brief?
10 MR. CHOW: Yeah, probably. I mean, if
11 we file the brief and then Dow was on the verge
12 of finishing its comparable fuels demonstration
13 and submitting its clean closure reports and
14 then two or three -- whatever -- how many weeks
15 later, Ohio EPA certifies the closure, then all
16 that work would have been for naught.
17 JUDGE SHEEHAN: Right. I understand
18 that, except that on looking at the laundry list
19 here, request for more time, beginning in '06,
20 and every time it looks like positive statements
21 were made about being near agreement in
22 principle, agreement in principle on all issues,

18	<p>1 think we can wrap this up by September 21st. 2 And each time, the good news is offset by more 3 bad news. So there's a certain amount of 4 skepticism here that I'm sure you can 5 appreciate. 6 MR. CHOW: Sure. I do appreciate 7 that. And it's just -- I don't know if I 8 would characterize this case as being cursed, 9 but it just seems like we were on the verge of 10 something and then something happens along the 11 way. But at this time, I just do really feel 12 that we're at the end of the line here. I 13 personally can't imagine something that would 14 occur that would prevent the comparable fuels 15 demonstrations from being accepted at some 16 point. 17 But I've been wrong before, so I 18 can't say with certainty that this will be 19 the last time. All I can say is that it 20 would just be -- I think -- it would just be 21 an inappropriate use of my time and the 22 government resources to file the brief on</p>	20	<p>1 explain to them the reason we have to do this 2 is because we just haven't been able to 3 terminate this. 4 So it would get -- unless I get 5 some management approval of this thing, it 6 would get shoved down to the bottom of their 7 priority list. 8 I can see the point, but I don't 9 think it would be a good thing to do right 10 now. 11 JUDGE SHEEHAN: It sounds like you 12 appreciate, though, from the board's point of 13 view, our job is to move cases, and this case 14 has done nothing but sit for well over two 15 years. It's one of our oldest cases. And if 16 somebody were looking at our docket, they would 17 certainly wonder why in the world we had given 18 so many extensions for so little fruit. 19 MR. CHOW: My job is to move cases, 20 too, and I have been concerned about -- but I 21 understand your point of view completely. I 22 should say I think at this point -- I think we</p>
19	<p>1 every single item that Dow has appealed. And 2 these are highly technical issues, too. 3 I mean, we spent a lot of time 4 trying to get all of our experts together 5 just going through these things in minute 6 detail and running models and calculations 7 and gathering more information. So to have 8 to go back into that when the case is just 9 about over -- that's just a formality of 10 trying to terminate the permit or -- I would 11 prefer not to have to file the brief. 12 I mean, I can understand why, 13 filing the brief would at least -- would 14 preclude these constant requests for 15 additional time. But I -- at this time, I 16 don't think that would be appropriate use of 17 EPA resources, because I would have to gather 18 back my experts and my staff people and our 19 experts -- we've had an awful time trying to 20 get them scheduled to meet with us. They are 21 so busy, and their expertise is so much in 22 demand that -- and then I would have to</p>	21	<p>1 really, really are the end. A few more months I 2 think really will do it. Everything seems -- I 3 think we have a plan and we have a timeline 4 that'll be subject to Ohio EPA's uncertainties 5 as far as getting its review done. 6 JUDGE SHEEHAN: Let me ask this: what 7 degree of probability do you both feel -- you 8 can each speak independently if you wish -- to 9 the prospect that this appeal would be withdrawn 10 by November 21st? 11 Mr. Chow, what's your -- 12 MR. CHOW: I have 95 percent certainty 13 on that. 14 JUDGE SHEEHAN: What about you, 15 Mr. Schmidt? 16 MR. SCHMIDT: Not quite 95 percent, 17 but I would say that if I needed to put a number 18 on it, I'd say 80 to 90 percent. And that's 19 just -- I mean, there are a couple of moving 20 pieces that we don't have control over. But 21 those moving pieces I think we can put pressure 22 on to get the review done. And the -- frankly,</p>

22	<p>1 I would agree with Kevin that at this point, 2 really what we're trying to get through is a 3 procedural hurdle, and that will take care of 4 all this.</p> <p>5 Previously, on a previous request 6 for extensions, I think -- we have reached 7 agreement on all the issues that we appealed 8 some time ago, and the problems that were 9 presented by trying to find a mechanism to 10 implement those changes in light of some 11 fairly significant regulatory 12 changes -- meaning the delegation of the BIF 13 program to Ohio EPA as well as the 14 determination that the best approach for the 15 facility was to go through the comparable 16 fuels demonstration -- I think that those are 17 actually -- I would say they're not bad news 18 in terms of what's happening. They may be 19 bad news in terms of moving this appeal 20 forward, but I think they're actually 21 positive events that have just happened to 22 have a negative impact on how fast we could</p>	24	<p>1 noting a couple of things. First, I will take 2 this back to the other judges -- I spoke to one 3 this morning and we discussed the concern of the 4 Board the duration this case has already had.</p> <p>5 And number two, Mr. Chow and/or 6 Mr. Schmidt, I strongly suggest that I if the 7 consequences, especially for the region are 8 grim, if the region has to file its brief, 9 the expenditure of resources involved and so 10 on, Region V oversees the state program, 11 Region V presumably funds the state program, 12 you might get some higher-level person, 13 program and/or legal to talk to their 14 counterparts in Ohio to be sure they can do 15 their part.</p> <p>16 MR. CHOW: Yeah, absolutely. 17 JUDGE SHEEHAN: And Ohio certainly has 18 this interest -- or should have an interest in 19 cooperating with Region V and not leaving 20 Region V hanging. 21 So I'll take this back and discuss 22 this, in light of this conversation, with the</p>
23	<p>1 get this case resolved.</p> <p>2 In particular, the comparable fuels 3 demonstration -- that's an environmentally 4 positive thing; removing hazardous waste from 5 being burned at the facility is certainly 6 something that -- Ohio EPA was very positive 7 about our efforts to move that forward -- and 8 thus, I think we will get their cooperation 9 in terms of moving this thing to final 10 closure.</p> <p>11 JUDGE SHEEHAN: I'll ask Ms. Berrios 12 if she has any questions. 13 MS. BERRIOS: I just have a 14 (inaudible) make sure that I understood 15 correctly, will Dow then withdraw the petition 16 after it receives a formal acknowledgement from 17 the region that they're no longer subject to the 18 BIF portion of the permit? And then after that, 19 we'll proceed with permanent modification? 20 MR. SCHMIDT: That's correct. 21 MS. BERRIOS: Okay. Thank you. 22 JUDGE SHEEHAN: I'll conclude then by</p>	25	<p>1 other judges and we'll go from there. We'll 2 see something shortly.</p> <p>3 Does anybody -- Mr. Schmidt, 4 Mr. Chow -- have anything to add before we 5 conclude? 6 MR. SCHMIDT: Not me? Mr. -- 7 MR. CHOW: Nope. 8 JUDGE SHEEHAN: Okay. 9 MR. CHOW: No, Your Honor, I don't 10 have anything. 11 JUDGE SHEEHAN: Thanks very much. 12 MR. CHOW: Thank you. 13 MR. SCHMIDT: Thank you. 14 (Whereupon, at approximately 15 11:24 a.m., the HEARING was 16 adjourned.) 17 * * * * * 18 19 20 21 22</p>

<p style="text-align: center;">A</p> <p>AB 5:2 able 13:6 20:2 above-entitled 1:11 absolutely 16:8 24:16 accepted 18:15 accepting 6:19 account 9:22 accumulate 11:22 acknowledge... 23:16 action 15:20 actual 15:19 add 25:4 additional 19:15 adjourned 25:16 agency 1:1 2:6 3:4 10:4 ago 4:21 6:1 22:8 agree 22:1 agreeable 14:1 agreement 10:2 17:21,22 22:7 allow 11:22 12:7 allowing 12:2 alternatives 8:12 amount 18:3 and/or 24:5,13 answer 10:20 anybody 25:3 anymore 10:6 anyone's 10:15 anyway 5:20 appeal 1:4 3:7 4:15 8:14 9:4 9:11,21 10:3,9 10:14 13:9,21 17:6 21:9 22:19 appealed 19:1 22:7 Appeals 1:1 3:2 APPEARANC...</p>	<p>2:1 appreciate 18:5 18:6 20:12 approach 22:14 appropriate 5:13 8:2 9:17 19:16 approval 20:5 approved 10:14 10:15 approximately 1:12 25:14 argument 3:22 Arthur 2:3 asking 4:3 assistance 15:9 associated 12:19 assuming 12:10 13:5 assurances 13:20 attorney 3:11 August 1:9 3:12 authority 4:9 authorized 4:18 Avenue 1:13 awful 19:19 a.m 1:13 25:15</p> <hr/> <p style="text-align: center;">B</p> <p>back 14:5 19:8 19:18 24:2,21 bad 18:3 22:17 22:19 based 15:6 basically 11:17 beginning 16:14 17:19 begins 12:16,18 behalf 2:2,6 Berrios 1:18 3:10 13:14 23:11,13,21 best 9:6,20 10:10 22:14 better 14:9,18 BIF 4:18,19 5:7</p>	<p>6:4 9:14 10:6,8 13:7 22:12 23:18 bit 6:13 Board 1:1,19 3:3 24:4 board's 20:12 boiler 11:5,8 bottom 20:6 Boulevard 2:8 brief 17:9,11 18:22 19:11,13 24:8 briefing 3:21 building 8:1 burned 23:5 burning 11:9 business 5:22 busy 19:21</p> <hr/> <p style="text-align: center;">C</p> <p>C 2:7 3:1 calculations 19:6 called 11:16 care 22:3 case 3:11,15,21 7:5 11:6 14:7 16:2,12 18:8 19:8 20:13 23:1 24:4 cases 20:13,15 20:19 certain 15:20 18:3 certainly 15:8 15:11 16:5,20 17:1 20:17 23:5 24:17 certainty 7:1 18:18 21:12 certification 4:5 6:9,22 8:21 9:8 10:3,14,15 12:9,20 14:1 certified 9:12 certifies 17:15</p>	<p>certify 11:14 13:4 16:8 changes 22:10 22:12 characterize 13:18 18:8 Charles 1:17 3:8 Chemical 1:4 3:5 Chevron 5:21 Chicago 2:9 Chow 2:7 4:3,12 6:10 7:7 13:17 14:22 16:5 17:2,4,10 18:6 20:19 21:11,12 24:5,16 25:4,7 25:9,12 clean 6:8,15,21 7:9 8:22 11:14 13:22 17:13 cleaned 11:10,20 12:5 cleaning 12:13 clear 15:2 client 9:17 closing 11:14 closure 6:9,16 6:21 7:1,9 8:17 8:22 9:7,11 10:21 12:8,14 14:1 17:13,15 23:10 cloudy 14:16 Columbus 2:4 comfort 13:19 14:20 commit 7:13 9:6 14:13 16:20 commitment 16:17 Company 1:4 3:5 comparable 4:15 5:5,9,11 5:16,19 6:11 6:14 7:2 8:19</p>	<p>11:11 17:12 18:14 22:15 23:2 completed 11:4 completely 20:21 concern 24:3 concerned 20:20 conclude 23:22 25:5 concluding 9:21 conditions 9:15 conducts 6:15 confirmed 10:4 confirms 10:4 Connecticut 1:13 consequences 24:7 consider 10:5 13:7,21 constant 19:14 contact 17:2 continue 12:2 contrary 4:7 control 21:20 conversation 24:22 convey 9:1 convinced 9:17 cooperating 24:19 cooperation 23:8 correct 12:18 23:20 correctly 23:15 counsel 1:19 2:7 9:2 counterparts 24:14 couple 6:16 7:12 7:21 21:19 24:1 currently 8:20 cursed 18:8 cycle 16:14</p>
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