1	STATE OF MINNESOTA
2	OFFICE OF ADMINISTRATIVE HEARINGS
3	FOR THE MINNESOTA DEPARTMENT OF HEALTH
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6	In the Matter of the Minnesota Department of Health's
7	Proposed Amendments to Rules Governing Health Risk Limits for Groundwater, Minnesota Rules, Chapter 4717.
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9	OAH DOCKET NO. 5-9000-38941
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22	Met electronically via WebEx at 9:30 a.m. on April 6, 2023.
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24	BEFORE: Judge James Mortenson
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1	INDEX	
2		
3	SPEAKER/EXHIBITS PAGE	
4		
5	Judge Mortenson Intro 3	
6	Sarah Fossen Johnson, MDH 13	
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

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JUDGE MORTENSON: All right. I have 9:30, so we're going to convene this public rulemaking hearing.

Good morning, all. My name is Jim

Mortenson. I'm an Administrative Law Judge with the

Minnesota Office of Administrative Hearings. And I

want to welcome you this morning and thank you for

taking your time to be here today to participate in

this public rulemaking process.

Today is Thursday, April 6, 2023. It's 9:30 a.m. and we're here for a public hearing In the Matter of the Minnesota Department of Health's Proposed Amendments to Rules Governing Health Risk Limits for Groundwater. These are Minnesota Rules Chapter 4717. Specifically, these proposed rules govern the limits of certain chemicals in groundwater for the purpose of guiding state agencies and local authorities with enforcement authority over groundwater contamination, such as -these include agencies such as the Department of Agriculture, the Pollution Control Agency, and other state and local agencies. The proposed rule is assigned Revisor's ID Number 4587. This matter is also assigned Docket Number 5-9000-38941 by the Office of Administrative Hearings. Please pay

attention to these five numbers, 38941, as that will help you navigate the eComments website the Office of Administrative Hearings uses to collect written comments on rulemaking hearings. You should also reference this case number, the OAH Case Number, if you submit any written comments. Next.

My office, the Office of Administrative
Hearings, is an executive branch court. We're
independent of the Department of Health, and our
role is to provide hearings like this in a way
that's neutral and fair to all the participants.
And this includes overseeing executive branch agency
rulemaking such as this matter. The purpose of this
hearing is to allow the Department to present its
case for the proposed rules and to hear from the
public regarding the proposal before the rules are
finalized. Next.

Among other directives from the legislature, specifically those in Minnesota Statute Chapter 14, rulemaking hearings are conducted so that members of the public can be heard as part of the rulemaking process. And I'm here to ensure procedural fairness, to ensure that we're courteous to each other so that all the interested parties can be heard, and to draw out knowledge from as many

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voices as possible in this proceeding. An underlying assumption of this process is that we as a self-governing people collectively rely on each other to share wisdom, perspective about particular topics being considered for our collective wellbeing in our governance. There is a difference between construction criticism and discourteousness, and I'm here to police that. But it's always important that government agencies hear your thoughts, your experiences, and expertise in the formulation of public policies through rulemaking. Next.

This hearing is part of a process by which rules are adopted under the Minnesota Administrative Procedures Act. During this rulemaking proceeding, the agency is required to do three things: to document its statutory authority to adopt the proposed rules; second, to demonstrate that it's fulfilled all relevant, legal, and procedural requirements of the law; and third, to demonstrate the need and reasonableness for each portion of the proposed rules with an affirmative presentation of facts. Those are the three big issues that I'll be reviewing as part of this proceeding. And some of you have thoughts you wish to express about the rulemaking generally, and you have views about

particular aspects of the proposed rules. Your views are helpful to the Department and to the process. But please be aware that my job is not to rewrite the rules based upon the views of participants, and certainly not my own views, or is it to select one set of proposed rules or policy priorities over another set. My job, in addition to facilitating this public forum, is to ensure that the Department followed statutory requirements for rulemaking. Next, please.

After I complete my introductory remarks about the hearing procedures, I'll turn the presentation over to the Department's panel. After the Department concludes its presentation, I'll begin taking public comments. Yesterday we had the first day of hearing. Today is our second day of hearing. And yesterday I admitted the Department's exhibits in support of the rulemaking into the record. And those exhibits are available for you to view on the Department's website. And there will a link for that appearing on the screen shortly.

Also, there is a court reporter recording this proceeding today, transcribing the proceeding to create a record of the rulemaking hearing. And because there is a court reporter, if this is an

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extensive hearing, we'll take breaks from time to time and I'll choose points during the hearing when it makes sense to do so. And I've also authorized the court reporter to interrupt the proceeding to ensure the record is clear and to alert me to the need for any breaks that might be necessary.

The hearing will be concluded following the last commenter or by 4:30 p.m., whichever is earlier. Next, please.

Minnesota law provides certain requirements for rulemaking hearings, and these are listed on the slide. The essential aspects of the standards require that the Department submit its supporting evidence into the record, which it has done already, and that it has the opportunity to present oral evidence which it will repeat today for the benefit of the public who were not able to observe yesterday's hearing. Finally, interested people may comment and ask questions of agency representatives, and that's our primary purpose I may limit questioning that is repetitive today. or immaterial and comments that are discourteous or irrelevant. Next, please.

The agency is represented today by Tom Hogan, the Department's Environmental Health

Division Director; Josh Skaar, the Department's

Legal Counsel; and Sarah Fossen Johnson, the

Supervisor and Manager of the Department's

Environmental Surveillance and Assessment Section.

And these are the people who will provide testimony

about the proposed rules and will be available to

answer questions about the rules and the process for

revising them. Next, please.

As I previously indicated, the Department filed its exhibits with my office and those exhibits were admitted into the record officially yesterday. On the screen you'll see the link to where you can look at the exhibits that are part of the record. You can look at them now or you can look at them after the hearing and that's available for you. Next, please.

There are two ways you can submit comments into the record. First, you can provide oral comments here at the hearing. Second, you can submit written comments by our eComments website or by mail or by fax. And the information for doing that is on the screen. Comments are not accepted by email. Email is not a recognized method under the law for commenting in OAH proceedings. It's not reliable enough for the creation of a formal

rulemaking record. Emails sometimes are missed or misdirected and sometimes get caught in spam filters and are never received. So it's important to know that we also do not accept comments through social media platforms either. Next slide.

The preferred method for submitting written comments is through the eComment website. This allows the agency and others to see your comments as soon as they are submitted, and you can also read the comments of others on the website. The link for the eComments website is on the screen. Next slide, please.

so we're here today to hear from folks orally. If you want to comment using WebEx, please click on the chat icon on your screen, send a message that you wish to speak. Be sure to include your name and any organization you represent, and you'll be put in a queue in the order your request was received. For those of you participating by telephone, please enter \*3 on your telephone. And as all of the requests to speak come in, they'll be put into a queue and I'll start working through that list as it's provided by the Department staff. If you are in the telephone queue, you may press \*3 a second time to remove yourself from the queue but

still stay on the line to keep listening. Next, please.

For those commenting via WebEx, please turn your video on by clicking the video icon and that will allow me to see you. Commenters will be unmuted or invited to unmute themselves so that you can make your comment. My goal today is to hear from everyone who wishes to make a comment or ask a question. So please be mindful that there are others who also wish to speak and consider focusing your comment to be as clear and succinct as possible. Next, please.

It's important when making a comment or asking a question to fully identify yourself, spelling your first and last name and identifying any organization you represent even if you've already put that information in the chat. It's -- I want you to speak slowly and clearly so the court reporter can accurately record your identity and your comment. Next, please.

Please remember that this is a legal proceeding. Respect for the process includes respect for each other. Because we're human beings and imperfect, I have my role to play to ensure the process stays respectful. Next, please.

The court reporter's transcript is the official record of what is said here and will include all oral comments, the agency presentation, and questions and answers. I may include quotes in my report which comes from the transcript. Next, please.

remember that you can also file written comments. I have extended the comment period of a full 20 calendar days, which is allowed by law, to provide additional time for anyone to submit comments. This means that comments can be submitted through April 26, 2023. Comments are considered in the same way regardless of how they're received. Comments made at the hearing today are not more important or given more weight than any comments that are received in writing, and vice versa. Next, please.

It's important to remember the three issues that I'll be considering. And that includes whether the Department has legal authority to adopt these rules; whether the Department has complied with the legal and procedural requirements under law; and whether the rule is needed and reasonable. It's important if your comments relate to a particular part of the proposed rules, that you

identify the part you're addressing. Also, if you want to supplement your oral comments, you can do that using written comments or submitting materials you want to share with me and the Department and make it part of the record. And again, our preferred method for doing that is through our eComments website. But you can also mail or fax that information in. Next, please.

As I noted before, I've ordered that the comment period stay open for 20 days from the close of the hearing today. So you'll have until April 26, 2023, at 4:30 p.m. to submit comments. Next, please.

At the close of that comment period, there will be a five working day rebuttal period. That five-day period is meant for comment on the comments, not to introduce new matters. You'll have until May 3, 2023, at 4:30 p.m. to submit rebuttal to any of the comments that have been made in writing or that you hear at the hearing today. Next, please.

Then following the close of the record,
I'll prepare a report that contains my conclusion
about whether the Department has met its statutory
burdens in this matter, specifically whether the

agency has documented its authority to enact the rules, whether the agency has fulfilled all the required procedures, and whether the agency has demonstrated the need and reasonableness for each portion of the proposed rules. You can expect my decision, or my report, rather, approximately 30 days after the last comment deadline. Sometimes an extension is necessary, and that's something that I would discuss with the chief administrative law judge. But ultimately, my report will be published on the Office of Administrative Hearings website on the day that it's issued. Next, please.

A final reminder for lobbyists. If you are a lobbyist, you must register with the Minnesota Campaign Finance and Disclosure Board if you're appearing in our hearing today. Next, please.

I'm going to turn the presentation over to the Department's representative. I'll begin working my way through the queue after the break following the Department's presentation. And with that, I believe that Department's first speaker will be Tom Hogan. And I'll allow him to introduce himself and the remaining Department speakers.

MS. FOSSEN JOHNSON: Hi, Judge. This is Sarah Fossen Johnson. I believe that Tom Hogan is

not going to speak this morning. I'm going to go ahead and give my presentation, if that's all right.

JUDGE MORTENSON: That's fine. I know you provided the substance of the matter, and that's the important piece of this, so thank you.

MS. FOSSEN JOHNSON: Yeah. Good morning, and thank you for this opportunity to give background on this rulemaking effort. My name is Sarah Fossen Johnson. I am the Health Risk Assessment Supervisor and Manager of the Environmental Surveillance and Assessment Section at MDH. Next slide, please.

So besides where Judge Mortenson explained to find the rulemaking materials, you can also search: "health risk limits rules Minnesota" from a search general and it should also bring up the rulemaking documents for you to review. Next slide, please.

So the mission of the Minnesota Department of Health is to protect, maintain, and improve the health of all Minnesotans. Since approximately 75 percent of all drinking water in Minnesota is groundwater, it has long been recognized that protecting groundwater is important. In the context of public health, access to clean, high-quality

groundwater as a source of drinking water is one factor that contributes to health and helps maintain good health. Next slide, please.

The Groundwater Protection Act of 1989 reflects the importance of protecting groundwater as a resource. The goal was to maintain groundwater quality and to protect it from degradation and contamination. The Act authorized MDH to adopt rules, to set health protective limits known as health risk limits, or HRLs. The Groundwater Protection Act is clear that these limits are not to be used as pollute-to limits. The first rules under the statute were promulgated in 1993 and MDH currently has 146 health risk limits already promulgated through multiple rounds of rulemaking. Next slide, please.

Although the first health risk limits were promulgated in 1993, several improvements were needed to the methods for calculating them. The first improvement came in 2001 with the addition of the health standards statute. The legislature, led by Representative Jean Wagenius, gave MDH additional authority to consider a variety of health outcomes to ensure all life stages were protected. Examples include looking specifically at reproductive and

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developmental outcomes, impacts on immune function, and others.

The second major improvement for the derivation of health risk limits came in 2009 when the methodology that we continue to use today was promulgated. These changes to our methodology very specifically direct risk assessors on what parameters to use to ensure that all Minnesotans are protected by health risk limits. A major focus of these methods is that we protect those who are most sensitive and those who are most highly exposed because protecting those who would be most likely to suffer health effects will, by default, protect everyone else. This focus is accomplished by looking for specific windows of susceptibility such as infancy and pregnancy, and by also considering the magnitude and the duration of exposures. to note that many of the comments we have received so far in this rulemaking have expressed concerns around components of our methods, such as selecting the most sensitive end point from a developmental Our methods were promulgated in 2009 and therefore are not part of this rulemaking. slide, please.

The first bullet point here is the exact

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description of what a health risk limit is, the contamination of a water contaminant or a mixture of contaminants that people, including sensitive and highly-exposed subpopulations, can consume with little to no risk to health. We often shorthand this to a health risk limit being a safe value with our partners. Although we do acknowledge that it is virtually impossible to create a value that is safe for every person, this is our approach with every chemical assessment. Health risk limits are very different from regulatory values, which is usually what we think of with government. They do not have any regulatory actions attached to them by statute, which frees our partners such as other agencies to apply them according to the program specifications. Additionally, because the Health Risk Assessment Unit is not beholden to a specific regulatory agenda, the values can be developed solely based on the associated health effects of a chemical and not on other factors like cost of implementation or ease of treatment that might reduce how protective the values are.

The federal government also has values for chemicals in drinking water, and these are regulated by the Safe Drinking Water Act. These are typically

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calculated using adult exposures. MDH's methods direct us to look at life stages, not just adult or lifelong exposures, which has meant that we regularly develop values based on formula-fed infants because infants actually drink far more water for body weight than an adult. Infants represent not only a sensitive life stage but also a highly-exposed subpopulation.

And finally, health risk limits can be developed in a shorter time frame than a federal regulation and can address Minnesota specific contaminants. For example, more than 20 years ago, Minnesota discovered forever chemicals in our groundwater. Since that time, toxicologists in the Health Risk Assessment Unit have developed health-based values for six forever chemicals found in Minnesota groundwater, three of which are in this rulemaking. It is important to note that beyond just calculating an initial value, MDH toxicologists have made numerous updates to the values for the forever chemicals as new information has become available about their toxicity. The EPA has just released their first draft regulations for forever chemicals this March. Next slide, please.

I said some of this elsewhere but I want

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to reiterate. Health risk limits are designed by their very nature to be protective of all people. Here are a few specifics. We don't use average values in our calculations because average values don't protect people who drink a lot of water, like infants. We intentionally focus on sensitive individuals and those who are highly exposed. a careful review of all routes of exposure for a given chemical to make sure our water values won't combine with other exposures to create health problems. An example of this kind of multi-exposure approach would be when a chemical is found both in house dust and in drinking water. An infant who is frequently on the floor can possibly be exposed through both routes, so we need to take that into The health risk limits can also be used to account. calculate accumulative risk when multiple chemicals are present. Standard risk assessment methods look at one chemical at a time, which is not how they usually appear in the real world. Next slide, please.

Following the authorities given to MDH and using the 2009 methodology designed to protect
Minnesotans, including sensitive and highly-exposed subpopulations, MDH has derived or updated

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health-based guidance for 37 contaminants identified in groundwater and proposes to adopt these guidance values into rule. I want to point out that the n-hexane value will not be replaced with a health risk limit value because the data available was not high enough quality for us to derive a value under the 2009 methodology. The previous value was calculated prior to 2009 and was not protective. The value has been replaced with a type of value called risk assessment advice, which are not promulgated in rule. Next slide, please.

This is an example of a health risk limit. I want to give you a moment to give you an orientation to how we present the information. What you see here is similar to how it will appear in rule and it is exactly how it appears on our water guidance table on our website. For each chemical, we will derive a health protective value for each duration if we have the appropriate data to do so. For chemicals that lack enough data on health effects for a given duration, we simply mark them ND, or not derived. If you read across the table, you will see the duration, its associated health-based value, and the most sensitive health end points. So in this example with acetone, for

the chronic duration, the associated health-based value is 3,000 micrograms per liter, and the sensitive health end points are blood, liver, and kidney systems. You can see on this table that we have NA for the cancer value. This means not applicable, and usually means that we do not have information that we need to calculate a cancer-based value such as a slope factor for cancer potency or a cancer classification. Next slide, please.

This is the last slide, and it just gives you the timeline for this rulemaking. I think that the judge has gone over this already. I do want to emphasize that we do have post-hearing comment period, and we do certainly welcome additional written comments. Next slide.

I just wanted to say thank you again for allowing me to give background on our program and how health risk limits are derived. If you have additional questions, please follow up with Nancy Rice. She is our rules coordinator, among other things. And if she doesn't know the answer, I'm quite certain she can get you to someone who does. So thank you.

JUDGE MORTENSON: Thank you very much for the presentation. With that, we're going to take a

1	very short break before we begin public comments.
2	Members of the public who want to comment or have
3	questions for agency staff, the directions for
4	getting in the queue are presented on the screen.
5	And we'll reconvene just after 10:00 to begin the
6	public comments. Thank you.
7	(Recess.)
8	JUDGE MORTENSON: Thank you. We'll go
9	back on the record. We're prepared to receive
10	public comments and questions. Do we have anyone in
11	the queue ready to go?
12	MS. CAVANAGH: At this time, no one has
13	entered a message that would like to speak, but I
14	will continue to monitor for anyone wishing to
15	speak. Folks have the opportunity to enter their
16	information in the chat.
17	At this point, I'm still not seeing anyone
18	entering any information in the chat wishing to
19	speak.
20	JUDGE MORTENSON: Okay. Why don't we wait
21	a few more minutes just to be sure we don't
22	prematurely cut anybody off.
23	Do we have any calls or people lined up at
24	WebEx at this point?
25	MS. CAVANAGH: No, we do not.

1 JUDGE MORTENSON: Okay. Well, given we've 2 convened a second day in a row here, we've provided the opportunity for folks to make comments orally or 3 to ask questions. I don't think we've got anyone 4 interested in taking that opportunity right now. 5 I understand from the Department's presentation 6 written comments have been received at this point. 7 Those are part of the record, and I'll certainly be 8 looking at those. And as I indicated earlier, the 9 written comment period following this hearing will 10 stay open until April 26 so folks can please take 11 12 advantage of that. And if there is any rebuttal to any written comments that were received either 13 before this hearing or after the hearing, there will 14 be a short rebuttal period that concludes early May. 15 I know I said what that date was. May 3. 16 So you'll 17 have until 4:30 on May 3 for any rebuttal comments. 18 With that, we'll adjourn this public 19 rulemaking hearing for the Department of Health. And I thank everyone for their time and attention, 20 and wish you all a good afternoon. 21 22 (The hearing adjourned at approximately 10:05 a.m.) 23 24 25

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               I, Katriina Hendrickson, do hereby certify that
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    the above and foregoing transcript consisting of the
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    preceding 23 pages is a true and correct transcript of my
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    steno notes and is a full, true and complete transcript
    of the proceedings to the best of my ability.
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               Dated: April 13, 2023.
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                              /s/ Katriina Hendrickson
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                              Registered Professional Reporter
                              Shaddix & Associates
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                              reporters@janetshaddix.com
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Zimits for Ground water	, Millinesota Kules, Cha	pter 4717 4-0-25	T	April 0, 2023
	5:13	3:10;11:12;12:11;	13:15	Chapter (2)
**	adult (3)	23:11	body (1)	3:15;4:20
*				
	18:1,2,6	around (1)	18:6	chat (4)
*3 (2)	advantage (1)	16:20	both (2)	9:15;10:17;22:16,
9:20,24	23:12	aspects (2)	19:12,15	18
	advice (1)	6:1;7:12	branch (2)	chemical (6)
${f A}$	20:10	Assessment (8)	4:8,12	17:10,19;19:9,12,
11	affirmative (1)	8:4;14:10,11;17:10,	break (2)	19;20:17
abla (1)	5:21	16;18:15;19:18;20:10	13:19;22:1	chemicals (8)
able (1)	afternoon (1)	assessors (1)	breaks (2)	3:16;17:24;18:13,
7:17	23:21	16:7	7:1,6	16,21,24;19:17;20:20
accept (1)	again (2)	assigned (2)	bring (1)	chief (1)
9:4	12:5;21:16	3:23,24	14:16	13:9
accepted (1)				
8:22	agencies (5)	associated (3)	bullet (1)	choose (1)
access (1)	3:18,20,22;5:9;	17:19;20:23;21:1	16:25	7:2
14:25	17:14	assumption (1)	burdens (1)	chronic (1)
accomplished (1)	Agency (11)	5:2	12:25	21:1
16:14	3:21;4:12;5:15;	attached (1)		classification (1)
according (1)	7:19,24;9:8;11:3;	17:13	C	21:9
17:15	13:1,2,3;22:3	attention (2)		clean (1)
	agenda (1)	4:1;23:20	calculate (2)	14:25
account (1)	17:18	authorities (2)	19:17;21:7	clear (3)
19:16	ago (1)	3:18;19:22	calculated (2)	7:5;10:11;15:11
accumulative (1)	18:12	authority (5)	18:1;20:8	
19:17				clearly (1) 10:18
accurately (1)	Agriculture (1)	3:19;5:16;11:20;	calculating (2)	
10:19	3:21	13:1;15:23	15:19;18:19	click (1)
acetone (1)	ahead (1)	authorized (2)	calculations (1)	9:15
20:25	14:2	7:3;15:8	19:4	clicking (1)
acknowledge (1)	alert (1)	available (5)	calendar (1)	10:4
17:7	7:5	6:19;8:6,15;18:22;	11:10	close (3)
across (1)	allow (3)	20:5	called (1)	12:10,14,22
20:22	4:14;10:5;13:22	average (2)	20:10	collect (1)
	allowed (1)	19:3,4	calls (1)	4:3
Act (5)	11:10	aware (1)	22:23	collective (1)
5:14;15:4,8,11;	allowing (1)	6:3	came (2)	5:5
17:25	21:17	0.3	15:20;16:4	collectively (1)
actions (1)		В		
17:13	allows (1)	Ъ	Campaign (1)	5:3
actually (1)	9:8		13:15	combine (1)
18:5	Although (2)	back (1)	can (26)	19:10
addition (2)	15:17;17:7	22:9	4:21,24;8:12,14,14,	comment (16)
6:7;15:20	always (1)	background (2)	17,18,19;9:9;10:7,19;	7:19;9:14;10:7,8,
additional (4)	5:8	14:8;21:17	11:8,12;12:2,7;13:5;	11,13,20;11:7,9;
11:11;15:22;21:14,	Amendments (1)	based (3)	14:14;17:4,18;18:9,	12:10,14,16;13:7;
11:11;13:22;21:14,	3:13	6:4;17:18;18:4	11;19:14,16;21:4,22;	21:13;22:2;23:10
	Among (2)	become (1)	23:11	commenter (1)
Additionally (1)	4:18;21:20	18:21	cancer (3)	7:8
17:16	appear (2)	begin (4)	21:5,8,9	Commenters (1)
address (1)	19:20;20:15	6:15;13:18;22:1,5	cancer-based (1)	10:5
18:11	appearing (2)	beholden (1)	21:7	commenting (2)
addressing (1)				
12:1	6:21;13:16	17:17	careful (1)	8:24;10:3
adjourn (1)	appears (1)	beings (1)	19:8	comments (34)
23:18	20:16	10:23	Case (3)	4:4,6;6:15;7:22;
adjourned (1)	applicable (1)	benefit (1)	4:5,5,15	8:17,19,20,22;9:4,7,9,
23:22	21:6	7:17	caught (1)	10;11:3,8,11,12,13,
Administrative (8)	apply (1)	besides (1)	9:2	14,16,24;12:2,3,12,
3:5,6,25;4:3,7;5:13;	17:15	14:13	CAVANAGH (2)	17,19;16:18;21:15;
	approach (2)	beyond (1)	22:12,25	22:1,6,10;23:3,7,13,
13:9,11	17:9;19:12	18:18	certain (3)	17
admitted (2)	appropriate (1)	big (1)	3:16;7:10;21:22	complete (1)
6:17;8:11	20:19	5:22	certainly (3)	6:11
adopt (4)	approximately (3)	blood (1)	6:5;21:14;23:8	
5:16;11:20;15:8;				complied (1)
20:2	13:6;14:21;23:22	21:3	changes (1)	11:21
adopted (1)	April (4)	Board (1)	16:6	components (1)

Limits for Groundwat	ter, Minnesota Rules, Cha	pter 4/1/ 4-6-23		April 6, 2023
16:20		discourteous (1)	emphasize (1)	11:9
concerns (1)	D	7:22	21:13	extension (1)
16:19	D	discourteousness (1)	enact (1)	13:8
concluded (1)	1 (0)	5:7	13:1	extensive (1)
7:7	data (3)	discovered (1)	end (3)	7:1
concludes (2)	20:5,19,20	18:13	16:21;20:25;21:3	/ . 1
6:14;23:15	date (1)	discuss (1)	enforcement (1)	$\mathbf{F}$
conclusion (1)	23:16	13:9	3:18	T.
12:23	day (5)	Division (1)	enough (3)	facilitating (1)
conducted (1)	6:16,16;12:15;	8:1	8:25;20:6,20	6:8
4:20	13:12;23:2	Docket (1)	ensure (7)	factor (2)
consider (2)	days (3)	3:24	4:22,23;6:8;7:5;	15:2;21:8
10:10;15:23	11:10;12:10;13:7	document (1)	10:24;15:24;16:8	factors (1)
considered (2)	<b>deadline (1)</b> 13:7	5:16	enter (2)	17:20
5:5;11:13	decision (1)	documented (1)	9:20;22:15	facts (1)
considering (2)	13:6	13:1	entered (1)	5:22
11:19;16:16	default (1)	documents (1)	22:13	fair (1)
construction (1)	16:13	14:17	entering (1)	4:11
5:7	degradation (1)	done (1)	22:18	fairness (1)
consume (1)	15:7	7:15	<b>Environmental (3)</b>	4:23
17:4	demonstrate (2)	draft (1)	7:25;8:4;14:11	far (2)
contains (1)	5:17,19	18:23	<b>EPA</b> (1)	16:19;18:5
12:23	demonstrated (1)	draw (1)	18:22	fax (2)
contaminant (1)	13:4	4:25	essential (1)	8:21;12:7
17:2	Department (17)	drink (2)	7:12	federal (2)
contaminants (3)	3:12,20;4:9,14;6:2,	18:5;19:5	even (1)	17:23;18:10
17:3;18:12;20:1	9,14;7:13;8:9;9:23;	drinking (5)	10:16	few (2)
contamination (3)	11:20,21;12:4,24;	14:22;15:1;17:24,	everyone (3)	19:3;22:21
3:19;15:8;17:2	13:23;14:19;23:19	25;19:13	10:8;16:14;23:20	file (1)
context (1)	Department's (10)	duration (5)	evidence (2)	11:8
14:24	6:13,17,20;7:25;	16:17;20:19,21,23;	7:14,16	filed (1)
continue (2)	8:1,3;13:18,20,21;	21:1	exact (1)	8:10
16:5;22:14	23:6	<b>During (2)</b>	16:25	filters (1)
contributes (1)	derivation (1)	5:14;7:2	exactly (1)	9:2
15:2	16:4	dust (1)	20:16	final (1)
Control (1)	derive (2)	19:13	example (4)	13:13
3:21	20:6,18	E	18:12;19:11;20:12, 25	finalized (1)
convene (1) 3:2	derived (3)	I.	Examples (1)	4:17 <b>Finally (2)</b>
convened (1)	19:25;20:22;21:18	oorlier (2)	15:24	
23:2	description (1)	earlier (2) 7:9;23:9	executive (2)	7:18;18:9 <b>Finance (1)</b>
coordinator (1)	17:1	7:9;23:9 early (1)	4:8,12	13:15
21:20	designed (2)	23:15	exhibits (5)	find (1)
cost (1)	19:1,23	ease (1)	6:18,19;8:10,10,13	14:14
17:20	develop (1)	17:20	expect (1)	fine (1)
Counsel (1)	18:4	eComment (1)	13:5	14:3
8:2	developed (3)	9:7	experiences (1)	First (10)
court (6)	17:18;18:10,15 developmental (2)	eComments (4)	5:10	5:15;6:16;8:18;
4:8;6:22,25;7:4;	16:1,21	4:2;8:20;9:11;12:7	expertise (1)	10:15;13:21;15:12,
10:18;11:1	difference (1)	effects (3)	5:10	17,20;16:25;18:23
courteous (1)	5:6	16:13;17:19;20:21	explained (1)	five (2)
4:23	different (1)	effort (1)	14:13	4:1;12:15
create (3)	17:11	14:8	exposed (3)	five-day (1)
6:24;17:8;19:10	direct (2)	either (2)	16:11;19:7,14	12:16
creation (1)	16:7;18:2	9:5;23:13	exposure (1)	floor (1)
8:25	directions (1)	else (1)	19:8	19:14
criticism (1)	22:3	16:14	exposures (4)	focus (3)
5:7	directives (1)	elsewhere (1)	16:17;18:1,3;19:10	16:9,14;19:6
currently (1)	4:18	18:25	express (1)	focusing (1)
15:14	Director (1)	Email (2)	5:24	10:10
cut (1)	8:1	8:23,23	expressed (1)	folks (4)
22:22	Disclosure (1)	Emails (1)	16:19	9:13;22:15;23:3,11
	13:15	9:1	extended (1)	follow (1)
		1		

Limits for Groundwater	r, Minnesota Rules, Chap	oter 4717 4-6-23		April 6, 2023
21.10	24 15 1 4 5 6 10		10.10	1 1/4)
21:19	24;15:1,4,5,6,10;		18:19	led (1)
followed (1)	18:14,17;20:2	I	intentionally (1)	15:21
6:9	guidance (3)		19:6	legal (5)
following (5)	20:1,2,17	icon (2)	interested (3)	5:18;8:2;10:21;
7:7;12:22;13:19;	guiding (1)	9:15;10:4	4:24;7:18;23:5	11:20,22
19:22;23:10	3:17	ID (1)	interrupt (1)	legislature (2)
forever (4)		3:23	7:4	4:19;15:21
18:13,16,21,23	H	identified (1)	into (7)	life (3)
formal (1)			6:18;7:14;8:11,18;	15:24;18:2,7
8:25	Health (38)	20:1	9:22;19:15;20:3	lifelong (1)
formula-fed (1)	3:13;4:9;7:25;14:9,	identify (2)	introduce (2)	18:3
18:4	15,20,21,25;15:2,3,9,	10:14;12:1	12:17;13:22	likely (1)
formulation (1)	10,14,17,21,23;16:4,	identifying (1)	introductory (1)	16:12
5:10		10:15	6:11	limit (5)
	9,13;17:1,5,6,10,16,	identity (1)		
forum (1)	19;18:9,15;19:1,10,	10:19	invited (1)	7:21;17:1,6;20:5,12
6:8	16;20:4,12,18,20,24;	immaterial (1)	10:6	<b>Limits</b> (16)
Fossen (5)	21:3,18;23:19	7:22	irrelevant (1)	3:14,16;14:15;15:9,
8:2;13:24,25;14:6,9	health-based (4)	immune (1)	7:23	10,11,12,14,17;16:4,
found (2)	18:16;20:1,24;21:1	16:1	issued (1)	9;17:10;18:9;19:1,16;
18:16;19:12	Health's (1)	impacts (1)	13:12	21:18
frame (1)	3:12	16:1	issues (2)	line (1)
18:10	hear (5)	imperfect (1)	5:22;11:19	10:1
frees (1)	4:15;5:9;9:13;10:7;	10:24		lined (1)
17:14	12:20	implementation (1)	$\mathbf{J}$	22:23
frequently (1)	heard (2)	17:20		link (3)
19:14	4:21,25		Jean (1)	6:21;8:12;9:11
fulfilled (2)	hearing (23)	importance (1)	15:22	list (1)
5:18;13:2	3:3,11;4:14;5:12;	15:5	Jim (1)	9:23
full (1)	6:12,16,17,24;7:1,2,7,	important (9)	3:4	listed (1)
11:9		5:8;9:3;10:13;		7:12
	18;8:15,19;11:15;	11:15,18,24;14:5,24;	<b>job</b> (2)	
fully (1)	12:11,20;13:16;	18:18	6:3,7	listening (1)
10:14	23:10,14,14,19,22	impossible (1)	Johnson (5)	10:1
function (1)	Hearings (9)	17:8	8:2;13:24,25;14:6,9	liter (1)
16:1	3:6,25;4:3,4,8,10,	improve (1)	Josh (1)	21:2
_	20;7:11;13:11	14:20	8:1	little (1)
G	help (1)	improvement (2)	<b>JUDGE</b> (11)	17:5
	4:2	15:20;16:3	3:1,5;13:10,24;	liver (1)
gave (1)	helpful (1)	improvements (1)	14:3,13;21:12,24;	21:3
15:22	6:2	15:18	22:8,20;23:1	lobbyist (1)
general (1)	helps (1)	include (5)		13:14
14:16	15:2	3:20;9:16;11:3,4;	K	lobbyists (1)
generally (1)	Hi (1)	15:25		13:13
5:25	13:24		keep (1)	local (2)
given (5)	high (1)	includes (3)	10:1	3:18,22
11:15;19:9,22;	20:6	4:12;10:22;11:19		•
20:21;23:1		including (2)	kidney (1)	long (1) 14:23
,	highly (2)	17:3;19:24	21:4	
gives (1)	16:11;19:7	independent (1)	kind (1)	look (5)
21:10	highly-exposed (3)	4:9	19:11	8:13,14,14;18:2;
goal (2)	17:4;18:8;19:24	indicated (2)	knowledge (1)	19:18
10:7;15:6	high-quality (1)	8:9;23:9	4:25	looking (3)
Good (4)	14:25	individuals (1)	known (1)	15:25;16:15;23:9
3:4;14:6;15:3;	himself (1)	19:7	15:9	lot (1)
23:21	13:22	infancy (1)		19:5
govern (1)	Hogan (3)	16:16	L	
3:16	7:25;13:22,25	infant (1)		$\mathbf{M}$
governance (1)	house (1)	19:13	lack (1)	
governance (1)	House (1)	17.13	20:20	magnitude (1)
		infants (4)	20.20	
5:6	19:13	infants (4)		
5:6 Governing (1)	19:13 <b>HRLs (1)</b>	18:5,5,6;19:6	last (4)	16:17
5:6 <b>Governing (1)</b> 3:13	19:13 HRLs (1) 15:10	18:5,5,6;19:6 <b>information (8)</b>	last (4) 7:8;10:15;13:7;	16:17 mail (2)
5:6 Governing (1) 3:13 government (3)	19:13 HRLs (1) 15:10 human (1)	18:5,5,6;19:6 information (8) 8:21;10:17;12:8;	last (4) 7:8;10:15;13:7; 21:10	16:17 mail (2) 8:21;12:7
5:6 Governing (1) 3:13 government (3) 5:9;17:12,23	19:13 HRLs (1) 15:10	18:5,5,6;19:6 <b>information (8)</b> 8:21;10:17;12:8; 18:21;20:14;21:7;	last (4) 7:8;10:15;13:7; 21:10 Law (7)	16:17 mail (2) 8:21;12:7 maintain (3)
5:6 Governing (1) 3:13 government (3)	19:13 HRLs (1) 15:10 human (1)	18:5,5,6;19:6 information (8) 8:21;10:17;12:8;	last (4) 7:8;10:15;13:7; 21:10	16:17 mail (2) 8:21;12:7

Ellints for Groundwater	r, Minnesota Kules, Chap	JULI 4717 4-0-23		April 6, 2023
16:3,9	9:2	16:23;18:24;19:20;	21:12	22:17,24;23:7
makes (1)	missed (1)	20:11;21:9,15	overseeing (1)	points (3)
7:3	9:1	n-hexane (1)	4:12	7:2;20:25;21:3
		` ,		
making (1)	mission (1)	20:4	own (1)	police (1)
10:13	14:19	note (2)	6:5	5:8
Manager (2)	mixture (1)	16:18;18:18		policies (1)
8:3;14:10	17:2	noted (1)	P	5:11
*			1	
many (2)	moment (1)	12:9		policy (1)
4:25;16:18	20:13	Number (4)	panel (1)	6:6
March (1)	monitor (1)	3:23,24;4:5,5	6:13	pollute-to (1)
18:24	22:14	numbers (1)	parameters (1)	15:12
mark (1)	more (5)	4:1	16:8	Pollution (1)
20:21	11:15,16;18:5,12;	numerous (1)	part (9)	3:21
materials (2)	22:21	18:20	4:21;5:12,23;8:13;	portion (2)
12:3;14:14	morning (4)		11:25;12:1,5;16:23;	5:20;13:5
Matter (5)		0		
	3:4,7;14:1,6	U	23:8	possible (2)
3:12,23;4:13;12:25;	MORTENSON (8)		participants (2)	5:1;10:12
14:4	3:1,5;14:3,13;	OAH (2)	4:11;6:5	possibly (1)
matters (1)	21:24;22:8,20;23:1	4:5;8:24	participate (1)	19:14
12:17	most (5)	observe (1)	3:8	post-hearing (1)
may (8)	16:10,11,12,21;	7:18	participating (1)	21:13
7:19,21;9:24;11:4;	20:24	off (1)	9:19	potency (1)
12:18;23:15,16,17	much (1)	22:22	particular (3)	21:8
MDH (7)	21:24	Office (7)	5:4;6:1;11:25	preferred (2)
14:12;15:8,13,22;	multi-exposure (1)	3:6,25;4:2,7,7;8:10;	parties (1)	9:6;12:6
18:19;19:22,25	19:11	13:11	4:24	pregnancy (1)
MDH's (1)	multiple (2)	official (1)	partners (2)	16:16
18:1	15:15;19:17	11:2	17:7,14	prematurely (1)
means (3)	must (1)	officially (1)	*	22:22
			pay (1)	
11:12;21:5,6	13:14	8:11	3:25	prepare (1)
meant (2)		often (1)	people (7)	12:23
12:16;18:3	N	17:5	5:3;7:19;8:5;17:3;	prepared (1)
media (1)		one (4)	19:2,5;22:23	22:9
	NTA (1)			
9:5	NA (1)	6:6;15:1;19:19;	per (1)	present (4)
members (2)	21:5	22:12	21:2	4:14;7:16;19:18;
4:21;22:2	name (4)	only (1)	percent (1)	20:14
message (2)	3:4;9:17;10:15;	18:7	14:22	presentation (9)
9:16;22:13	14:8	open (2)	period (8)	5:21;6:13,14;11:3;
met (1)	Nancy (1)	12:10;23:11	11:9;12:10,14,15,	13:17,20;14:2;21:25;
12:24	21:19	opportunity (5)	16;21:14;23:10,15	23:6
method (3)	nature (1)	7:15;14:7;22:15;	person (1)	presented (1)
8:23;9:6;12:6	19:2	23:3,5	17:9	22:4
		*		
methodology (4)	navigate (1)	oral (4)	perspective (1)	press (1)
16:5,6;19:23;20:7	4:2	7:16;8:18;11:3;	5:4	9:24
methods (6)	ND (1)	12:2	piece (1)	previous (1)
15:19;16:10,20,22;	20:22	orally (2)	14:5	20:7
18:1;19:18	necessary (2)	9:14;23:3	platforms (1)	previously (1)
			•	• • •
micrograms (1)	7:6;13:8	order (1)	9:5	8:9
21:2	need (5)	9:18	play (1)	primary (1)
might (2)	5:20;7:6;13:4;	ordered (1)	10:24	7:20
7:6;17:21	19:15;21:7	12:9	Please (36)	prior (1)
mindful (1)	needed (2)	organization (2)	3:25;6:3,10;7:9,23;	20:8
10:9	11:23;15:19	9:17;10:16	8:8,16;9:12,14,20;	priorities (1)
Minnesota (13)	neutral (1)	orientation (1)	10:2,3,9,12,20,21,25;	6:7
3:6,12,14;4:19;	4:11	20:14	11:6,7,17;12:8,13,21;	problems (1)
5:13;7:10;13:14;	new (2)	others (4)	13:12,16;14:12,18;	19:11
14:15,19,22;18:11,13,	12:17;18:21	9:8,10;10:10;16:2	15:3,16;16:24;18:24;	procedural (3)
17	Next (31)	out (2)	19:21;20:11;21:9,19;	4:23;5:18;11:22
Minnesotans (3)	4:6,17;5:11;6:10;	4:25;20:3	23:11	Procedures (3)
14:21;16:8;19:24	7:9,23;8:8,16;9:5,12;	outcomes (2)	pm (3)	5:14;6:12;13:3
minutes (1)	10:1,12,20,25;11:5,	15:23;16:1	7:8;12:12,18	proceeding (7)
22:21	17;12:8,12,21;13:12,	over (5)	point (6)	5:1,14,23;6:23,23;
misdirected (1)	16;14:12,17;15:3,16;	3:19;6:7,13;13:17;	16:21,25;20:3;	7:4;10:22
	1	1		1

			T	
proceedings (1)	13:6	8:25	21:20	sensitive (8)
8:24	read (2)		right (3)	
		rely (1)		16:11,21;17:3;18:7;
process (8)	9:10;20:22	5:3	3:1;14:2;23:5	19:6,24;20:24;21:3
3:9;4:22;5:2,12;	ready (1)	remaining (1)	Risk (24)	set (3)
6:3;8:7;10:22,25	22:11	13:23	3:13;14:9,15;15:10,	6:6,7;15:9
program (2)	real (1)	remarks (1)	14,17;16:4,7,9;17:1,5,	several (1)
17:15;21:17	19:20	6:11	6,10,16;18:9,15;19:1,	15:18
promulgated (6)	reasonable (1)	remember (3)	16,17,18;20:5,10,12;	share (2)
15:13,15,18;16:6,	11:23	10:21;11:8,18	21:18	5:4;12:4
22;20:11	reasonableness (2)	reminder (1)	role (2)	short (2)
proposal (1)	5:20;13:4	13:13	4:10;10:24	22:1;23:15
4:16	rebuttal (5)	remove (1)	rounds (1)	shorter (1)
Proposed (11)	12:15,18;23:12,15,	9:25	15:15	18:10
3:13,15,22;4:15;	17	repeat (1)	routes (2)	shorthand (1)
5:17,21;6:1,6;8:6;	receive (1)	7:16	19:8,15	17:5
11:25;13:5	22:9	repetitive (1)		shortly (1)
			row (1)	
proposes (1)	received (7)	7:21	23:2	6:21
20:2	9:3,19;11:14,16;	replaced (2)	<b>rule</b> (5)	similar (1)
protect (6)	16:18;23:7,13	20:4,9	3:22;11:23;20:3,11,	20:15
14:20;15:7;16:10,	Recess (1)	report (4)	16	simply (1)
13;19:5,23	22:7	11:5;12:23;13:6,10	rulemaking (23)	20:21
protected (2)	recognized (2)	reporter (4)	3:2,9;4:4,13,20,22;	six (1)
15:24;16:9	8:23;14:23	6:22,25;7:4;10:19	5:11,14,25;6:10,18,	18:16
· · · · · · · · · · · · · · · · · · ·				
protecting (3)	reconvene (1)	reporter's (1)	24;7:11;9:1;14:8,14,	Skaar (1)
14:24;15:5;16:12	22:5	11:1	17;15:15;16:19,23;	8:1
Protection (2)	record (14)	represent (3)	18:18;21:11;23:19	slide (14)
15:4,11	6:19,24;7:5,14;	9:17;10:16;18:7	<b>Rules (21)</b>	7:12;9:5,12;14:12,
protective (5)	8:11,13,18;9:1;10:19;	representative (2)	3:13,14,15;4:15,16;	17;15:3,16;16:24;
15:9;17:21;19:2;	11:2;12:5,22;22:9;	13:18;15:22	5:13,17,21;6:1,4,6;	18:24;19:20;20:11;
20:8,18	23:8	representatives (1)	8:6,7;11:21,25;13:2,	21:9,10,15
provide (4)	recording (1)	7:20	5;14:15;15:9,12;	slope (1)
	6:22		21:20	21:8
4:10;8:5,18;11:10		represented (1)	21:20	
provided (3)	reduce (1)	7:24	G.	slowly (1)
9:23;14:4;23:2	17:21	reproductive (1)	S	10:18
provides (1)	reference (1)	15:25		social (1)
7:10	4:5	request (1)	safe (3)	9:4
public (15)	reflects (1)	9:18	17:6,8,25	solely (1)
3:2,9,11;4:16,21;	15:5	requests (1)	same (1)	17:18
5:11;6:8,15;7:17;	regarding (1)	9:21	11:13	someone (1)
14:25;22:1,2,6,10;	4:16	require (1)	Sarah (3)	21:22
		- 10 ` ´		
23:18	regardless (1)	7:13	8:2;13:25;14:9	sometimes (3)
published (1)	11:14	required (2)	screen (6)	9:1,2;13:7
13:10	register (1)	5:15;13:3	6:21;8:12,22;9:11,	soon (1)
purpose (3)	13:14	requirements (4)	15;22:4	9:9
3:17;4:13;7:20	regularly (1)	5:19;6:9;7:11;	search (2)	source (1)
put (3)	18:4	11:22	14:15,16	15:1
9:18,22;10:17	regulated (1)	resource (1)	second (6)	spam (1)
7.10,22,10.17	17:24	15:6	5:17;6:16;8:19;	9:2
•				speak (8)
Q	regulation (1)	Respect (2)	9:25;16:3;23:2	
	18:11	10:22,23	Section (2)	9:16,21;10:10,18;
quality (2)	regulations (1)	respectful (1)	8:4;14:11	14:1;22:13,15,19
15:7;20:6	18:23	10:25	seeing (1)	speaker (1)
queue (7)	regulatory (3)	review (2)	22:17	13:21
9:18,22,24,25;	17:11,13,17	14:17;19:8	select (1)	speakers (1)
13:19;22:4,11	reiterate (1)	reviewing (1)	6:6	13:23
quite (1)	19:1	5:23	selecting (1)	specific (3)
21:22	relate (1)	revising (1)	16:20	16:15;17:17;18:11
quotes (1)	11:24	8:8	self-governing (1)	Specifically (5)
11:4	released (1)	Revisor's (1)	5:3	3:15;4:19;12:25;
	18:23	3:23	send (1)	15:25;16:7
R	relevant (1)	rewrite (1)	9:15	specifications (1)
	5:18	6:4	sense (1)	17:15
41 (1)				
ratner (1)	renable (1)	Rice (1)	/:3	specifics (1)
rather (1)	reliable (1)	Rice (1)	7:3	specifics (1)

19:3 <b>spelling (1)</b> 10:15		unmute (1)	way (3)	
spelling (1)		ummute (1)	way (3)	
		10:6	4:10;11:13;13:19	
10:15	T			2
		unmuted (1)	ways (1)	
staff (2)	table (3)	10:6	8:17	20 (3)
9:23;22:3	20:17,22;21:4	<b>up</b> (3)	WebEx (3)	11:9;12:10;18:12
stage (1)	telephone (3)	14:16;21:19;22:23	9:14;10:3;22:24	2001 (1)
18:7	9:20,20,24	updated (1)	website (9)	15:20
stages (2)	testimony (1)	19:25	4:2;6:20;8:20;9:7,	2009 (5)
15:24;18:2	8:5	updates (1)	10,11;12:7;13:11;	16:4,22;19:23;20:7,
Standard (1)	therefore (1)	18:20	20:17	8
19:18	16:23	upon (1)	weight (2)	2023 (4)
standards (2)	third (1)	6:4	11:16;18:6	3:10;11:13;12:12,
7:13;15:21	5:19	use (3)	welcome (2)	18
start (1)	thoughts (2)	16:5,8;19:3	3:7;21:14	26 (3)
9:22		used (2)	wellbeing (1)	
state (2)	5:9,24	15:12;19:16	5:5	11:13;12:12;23:11
3:17,22	three (4)	uses (1)	whichever (1)	2
Statute (4)	5:15,22;11:18;	4:3	7:8	3
4:19;15:13,21;	18:17	using (4)	windows (1)	
	Thursday (1)		16:15	3 (3)
17:13	3:10	9:14;12:3;18:1; 19:23		12:18;23:16,17
statutory (3)	timeline (1)		wisdom (1)	3,000 (1)
5:16;6:9;12:24	21:11	usually (3)	5:4	21:2
stay (3)	today (15)	17:11;19:20;21:6	wish (4)	30 (1)
10:1;12:10;23:11	3:8,10;6:16,23;	₹7	5:24;9:16;10:10;	13:6
stays (1)	7:16,21,24;9:13;10:7;	$\mathbf{V}$	23:21	37 (1)
10:25	11:7,15;12:11,20;		wishes (1)	20:1
still (2)	13:16;16:5	value (14)	10:8	38941 (1)
10:1;22:17	Tom (3)	17:6,8;18:19;20:4,	wishing (2)	4:1
study (1)	7:24;13:21,25	5,6,7,9,9,18,24;21:2,5,	22:14,18	
16:22	topics (1)	8	working (3)	4
submit (7)	5:5	values (11)	9:22;12:15;13:18	_
4:6;7:13;8:17,20;	toxicity (1)	17:11,18,22,23;	world (1)	4:30 (4)
11:11;12:12,18	18:22	18:4,16,20;19:4,4,9;	19:20	7:8;12:12,18;23:17
submitted (2)	toxicologists (2)	20:3	writing (2)	4587 (1)
9:9;11:12	18:14,19	variety (1)	11:17;12:20	3:23
submitting (2)	transcribing (1)	15:23	written (10)	4717 (1)
9:6;12:3	6:23	versa (1)	4:3,6;8:20;9:7;	3:15
subpopulation (1)	transcript (2)	11:17	11:8;12:3;21:15;23:7,	3.13
18:8	11:1,5	via (1)	10,13	5
subpopulations (2)		10:3		
17:4;19:25	treatment (1)	vice (1)	Y	<b>7</b> 0000 20041 (1)
substance (1)	17:21	11:17	-	5-9000-38941 (1)
14:4	turn (3)	video (2)	years (1)	3:24
succinct (1)	6:12;10:4;13:17	10:4,4	18:12	
10:11	two (1)	view (1)	Yesterday (3)	6
suffer (1)	8:17	6:20	6:15,17;8:11	
16:13	type (1)			6 (1)
	20:9	views (4)	yesterday's (1)	3:10
<b>Supervisor (2)</b>	typically (1)	5:25;6:2,4,5	7:18	
8:3;14:10	17:25	virtually (1)	1	7
supplement (1)		17:8	1	
12:2	U	voices (1)	40.00 (4)	75 (1)
support (1)		5:1	10:00 (1)	14:21
6:18	ultimately (1)		22:5	
supporting (1)	13:10	$\mathbf{W}$	10:05 (1)	9
7:14	unable (1)		23:22	
sure (3)	11:7	Wagenius (1)	14 (1)	9:30 (2)
9:16;19:9;22:21	under (5)	15:22	4:20	3:1,11
Surveillance (2)	5:13;8:23;11:22;	wait (1)	146 (1)	J.1,11
8:4;14:11	15:12;20:6	22:20	15:14	
susceptibility (1)	underlying (1)	water (10)	1989 (1)	
16:15	5:2	14:22;15:1;17:2,24,	15:4	
systems (1)	Unit (2)	25;18:6;19:5,9,13;	1993 (2)	
21:4	17:17;18:15	20:16	15:13,18	
	17.17,10.13		,	