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# Environmental Law Update

WEB CONFERENCE SERIES

## Clean Air Act Updates: EPA's Important December Rulemakings

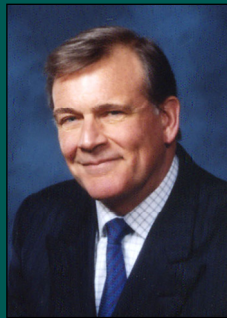
Thursday, January 12, 2012 • 11:30 a.m. – 12:30 p.m. Central

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## Recent Key Dates

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- December 16, 2011
  - Final EGU MACT rules released (not yet in FR)
- December 23, 2011
  - Re-proposed Boiler MACT, CISWI, and RCRA NHSM in FR
- December 30, 2011
  - DC Circuit Court stays Cross-State Rule
- January 9, 2012
  - DC District Court vacates EPA's suspension of Boiler MACT and CISWI

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## Mercury MACT

(Utility MACT, Electric  
Generating Unit MACT)

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## Background

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- Clinton-era decision to regulate
- Bush-era Clean Air Mercury Rule (CAMR)
  - Issued March 15, 2005
  - Fleet-wide approach
  - Health risk based as opposed to MACT (floor/beyond floor)
  - Included cap and trade for mercury
- CAMR vacated on February 8, 2008
  - Opinion required EGUs to be regulated in accordance with Section 112 (technology-based standards)



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## Background

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- Obama-era Rule
  - Traditional BACT
  - Top performers for floor
  - Beyond floor
- Timeline
  - May 3, 2011 – Proposed Rule
  - July 1, 2011 – Comment Period Ext. 30 days
  - December 16, 2011 – Final Rule

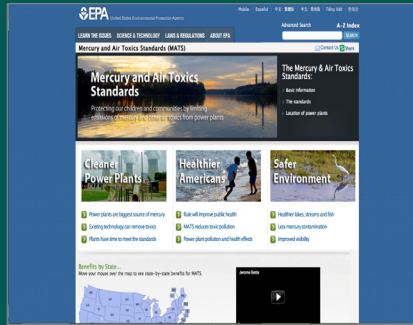


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# Marketing the Rule

- Public-at-Large
  - www.epa.gov/mats
  - Press releases with public endorsements
  - Media campaign
    - Announcement at Children's Hospital Colorado
    - Public service announcement featuring NFL's Jerome Bettis



# Marketing the Rule

## EPA FACT SHEET: Mercury and Air Toxics Standards BENEFITS AND COSTS OF CLEANING UP TOXIC AIR POLLUTION FROM POWER PLANTS

On December 16, 2011, the U.S. Environmental Protection Agency (EPA) finalized the first national Clean Air Act standards to reduce mercury and other toxic air pollution from coal and oil-fired power plants. The science shows that mercury and toxic air pollution is a threat to public health and has real impacts on people's lives. This fact sheet provides an overview of the benefits and highlights key impacts.

- Protect public health**—The Mercury and Air Toxics Standards (MATS) will save thousands of lives and prevent more than 100,000 heart and asthma attacks each year while providing important health protections to the most vulnerable, such as children and older Americans.
- Overdue reductions lead to vital health benefits**—Until now there were no national limits on emissions of mercury and other air toxics from power plants. Uncontrolled releases of toxic air pollutants like mercury—a neurotoxin—can impair children's ability to learn.
- Practical, cost-effective and protective standards**—More than 20 years ago, a bipartisan Congress passed the Clean Air Act Amendments and required EPA to control mercury and toxic air pollution. These standards will end 20 years of industry uncertainty while leveling the playing field for power plants, ensuring that modern pollution controls are installed.
- Jobs for American workers**—The updated standards will create thousands of good jobs for American workers who will be hired to build, install, and operate the equipment to reduce health-threatening emissions of mercury, acid gases, and other toxic air pollutants.
- Reliable, affordable energy**—The standards clean the air and keep the lights on.

### IMPROVE AIR QUALITY, PROTECT PUBLIC HEALTH

The Mercury and Air Toxics Standards Will Prevent:	Once Implemented (over each year)
Premature Death	Up to 22,000
Chronic Bronchitis	2,800
Heart Attacks	4,700
Asthma Attacks	230,000
Hospital and Emergency Room Visits	5,700
Restricted Activity Days	3,200,000

This chart shows the health benefits of the final standards to reduce mercury and other air toxics emissions from power plants.

- The standards will provide significant benefits to neighborhoods near power plants as well as communities hundreds of miles away.
- In addition to reducing emissions of mercury and other toxic air pollutants, the controls needed to meet the standards will result in reduced emissions of sulfur dioxide and fine particles, which will lower airborne soot levels throughout the United States.
- The value of the air quality improvements for human health alone total **\$37 billion** to **\$90 billion** each year.
- 540,000** missed work or "sick" days will be avoided each year, enhancing productivity and lowering health care costs.

- Framing
  - Emphasis on health effects/costs to society
  - Expressions – rule met with “traditional” controls
  - Effectiveness of “existing” technology
  - Jobs creation
  - Willingness to work on timing of implementation





## General Approach to Establishing Standards

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- By the book – followed MACT process from Clean Air Act and D.C. Circuit rulings
- Pollutant-by-pollutant approach for determining MACT
- No fleet-wide averaging



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## Changes to Proposed Rule

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- Revised definition of “coal-fired”/separated out “natural-gas fired” definition
- Cogeneration
  - 1/3 generation to grid and > 25 megawatts covered under EGU MACT
  - But if not, the boiler MACT
  - Can swing back and forth or opt to stay under EGU MACT
  - However, if burn solid waste and under CISWI, **cannot** opt out of CISWI



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## Changes to Proposed Rule

- Subcategorization – fuel
  - Low rank coal versus > 8,300 Btu coal
- Non-mercury HAP
  - Proposed Surrogate: total particulate matter
  - Final Surrogate: filterable particulate matter
  - Allows use of continuous monitoring systems



## Changes to Proposed Rule

- Work practice standards
  - Become more common in MACT standards as a “work around” to defining numerical standards
  - Inspecting, tuning, optimizing, maintaining records of work done and “tune-ups”
  - Moved tune-ups from 18-month cycle to 36 months unless “neural network” systems (4-year cycle)
  - Manufacturer specifications – able to apply to “extent applicable” (watch for this) and document “extent applicable”





## Key Components

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- Startup/shutdown
  - Specific definitions of when startup ends and shutdown begins
  - May see definition in other air permitting contexts, such as future BACT permits
  - All controls (except dry scrubbers/SCRs) on when coal being fired
  - Scrubber/SCR – when conditions allow; must operate (records important)
- Startup/shutdown days – excluded from 30-day rolling average calculations

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## Key Components

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- Malfunction
  - **Not** excluded from rolling average calculations
  - Enforcement discretion or affirmative defense
  - Affirmative defense (borrowed from wastewater treatment plant context) – burden on permittee to show:
    - Sudden, infrequent, unavoidable
    - Repaired quickly
    - Emissions minimized
  - Not required, but consider preparing malfunction plan in order to justify affirmative defense

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## Key Components

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- Monitoring
  - CEMs/PM parametric continuous monitoring
    - Seems to be preferred approach
  - Otherwise, quarterly tests
  - Emission averaging – much tighter than under CAMR
    - Existing sources
    - Same facility
    - Same subcategory
    - Averaging based on emission tests
  - Note – monitoring becoming more rigorous; has effect of limits being more stringent; less “room” for error



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## Compliance

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- Typical MACT
  - 3 years
  - Extend to 4 with equipment installation
- Atypical MACT
  - Extend to 5 years for cause and reliability concerns



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## Controversy in Industry

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- “Reliability” reports – pro/con
- Disagreements about rule in industry
- White House effort to avoid rule challenge by utilities



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## Challenges

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- Likely to occur as with all MACT rules
- Feasibility challenge?
- Unlike some other air rules –
  - U.S. EPA developed a large record to support rule
  - Followed conservative statutory approach for defining limits
  - May be “technical issues” but no apparent large issue as was the case with CAMR



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## Follow-up on CISWI / Boiler MACT and Non- Hazardous Secondary Materials (NHSM) Rules



## Recap: Environmental Law Update (February 24, 2011)

- Foley Environmental Law Update (February 24, 2011) covered new final CAA rules just released day before, including:
  - CAA 129 emission limits for "Commercial and Industrial Solid Waste Incineration Units" ("CISWI");
  - CAA 112 emission limits for major source boilers ("MACT" standards).
  - RCRA "non-hazardous secondary material" (NHSM) rules
- As covered in last update, EPA announced administrative "reconsideration" for both CAA rules simultaneously with their issuance, but not NHSM rule.





## Recap: Environmental Law Update (February 24, 2011)

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- Rules (and reconsideration notice) appear in March 21, 2011 Federal Register:
  - CISWI – 76 FR 15704
  - Boiler MACT – 76 FR 15608
  - NHSM – 76 FR 15456
  - Reconsideration (of CAA Rules) – 76 FR 15266



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## Flurry of Administrative and Judicial Activity Followed

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- Many industrial and environmental parties filed administrative petitions for reconsideration on both CISWI and Boiler MACT rules under CAA 307(d)(7)(B).
- Several industrial parties filed administrative petitions for new rulemaking of NHSM rule under RCRA.
- Many industrial and environmental parties filed petitions for review in DC Circuit on CISWI, Boiler MACT, and NHSM rules.



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## Flurry of Administrative and Judicial Activity Followed

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- In light of ongoing reconsiderations, EPA announced indefinite stay of effective date for both CISWI and Boiler Rules. May 18, 2011 (76 FR 28662). [Note: stay at that time did NOT extend existing source compliance dates (3 years Boiler MACT, 5 years CISWI).] EPA refused to stay NHSM rule, and initially refused to agree to propose any changes in NHSM rule.
- EPA sought to have DC Circuit judicial review on both rules put on hold ("held in abeyance") because administrative reconsideration will produce revised final rules. Industry parties did not object to abeyance, BUT Sierra Club and cohorts did.



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## Sierra Hotly Contesting Indefinite Stay

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- Sierra filed strong objection to EPA judicial review abeyance request, contending EPA has no authority to stay CAA rules on reconsideration for more than three months (relying on CAA 307(d)(7)(B), last sentence).
- If Sierra theory prevails, the current "indefinite" stay would become invalid.
- In DC Circuit response to Sierra objection, EPA announces schedule for reconsideration (also announced in press release same day):
  - For CISWI and Boiler MACT Rules:
    - Propose revisions by end of October, 2011
    - Finalize revisions by end of April, 2012
- EPA said nothing (at this time) about any NHSM rulemaking



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## Sierra Hotly Contesting Indefinite Stay

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- These dates not good enough for Sierra and cohorts. They have initiated new legal actions in both DC Circuit and in federal district court for the District of Columbia (jurisdictional uncertainties exist, so the DC Circuit filing is protective).
- They have filed motions with request for expedited action in federal district court. EPA will argue DC Circuit has exclusive jurisdiction.



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## Effects of Sierra Prevailing

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- If Sierra prevails, current stay could end any time. While compliance dates for existing sources are 3 years and 5 years off for Boiler MACT and CISWI, any new source commencing construction would be affected.
- Moreover, CISWI has different approach to "modifications" than MACT. Under MACT, only truly "new" sources or "reconstructions" trigger new source standards. Under CISWI, however, an existing source that has an increase in emission rate can trigger new source standards.
- Thus if Sierra prevails, any boiler, process heater, or cement kiln now combusting "solid waste" as defined in EPA's new NHSM RCRA rule could arguably become subject to CISWI new source standards if unit increases emissions after September 21, 2011.



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## December 2011 Re-proposals

- In meantime, EPA finally decided to propose amendments to RCRA NHSM rules as well as CAA CISWI and boiler MACT rules.
- So new proposed rules appear in FR of December 23:
  - CISWI and NHSM (combined in one rulemaking package) – 76 FR 80452
  - Boiler MACT – 76 FR 80598 (major sources); 76 FR 80532 (area sources)



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## For all proposals, public comment period expires February 21, 2012

- For all proposals, public comment period expires February 21, 2012
- EPA had committed to finalizing these rules by end of April 2012. Still in fear of reversal in district court Sierra litigation, so comment deadline extension unlikely.
- April 2012 will be almost impossible to meet, however.



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## Sierra Case Ruling January 9, 2012

- Judge Friedman VACATED EPA "delay notice" of May 18, 2011 in which EPA delayed the effective dates of CISWI and boiler MACT pending administrative reconsideration and judicial review. (*Sierra Club v. Jackson*, No. 11-1278, U.S. Dist. Ct. for D.C., Jan. 9, 2012.)
- Thus CISWI and boiler MACT rules published in the March 21, 2011 FR are legally in effect, despite fact that EPA had recognized they were so flawed they should be suspended and published major proposed revisions in the December 23, 2011 FR.



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## Sierra Case Ruling January 9, 2012

- Judge Friedman's opinion does not address specifically the issue of whether EPA could (as it has proposed on December 23, 2011) extend the compliance dates through the new rulemaking. But parts of opinion sound like he would rule that illegal.



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## Sierra Case Ruling January 9, 2012

- Judge explains why he "doubts" EPA could justify a stay under the "irreparable harm, likelihood of prevailing on the merits" grounds (quoting from pp. 41-42):
  - " The Court acknowledges that vacating the Delay Notice likely will have an effect on industry facilities throughout the country: they will finally, more than 12 years after a clear congressional mandate, have to comply with overdue Clean Air Act emission standards.

But although the Boiler Rule and the CISWI Rule *may* be changed after the reconsideration proceedings, EPA itself, in initiating reconsideration, expressly stated that the rules "reflect reasonable approaches consistent with the requirements of the Clean Air Act." AR at 187. Vacating the Delay Notice, therefore, will simply require industry facilities to comply with emission standards that EPA itself states are consistent with the Clean Air Act.

And finally, as Sierra Club points out, permitting the Delay Notice to remain in place and thereby depriving the Boiler Rule and the CISWI Rule of their effectiveness could have significant deleterious effects on the environment. "



## Key Points to Note on Re-proposals





## NHSM

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- EPA conceded a lot to certain industries, especially those who use biomass. Conceded very little to other industries, such as Portland Cement.
- "Clarifies" definition of "clean cellulosic biomass" by listing many forms of biomass that would be exempt.
- Includes several "clarifications" to application of "legitimacy criteria" that will make it much easier for materials to pass (and therefore be exempt).
  - Comparison with any fuel facility COULD burn, not just permitted to burn
  - Allow comparisons at high range



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## NHSM

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- Exempts tires in "established programs" and "resinated wood" from rules altogether.
- Solicits comments on other materials that may be entitled to national exemptions (mentions manure as possibility).
- States intent to make case-by-case petitions for non-waste determination much easier/swifter; with possibility that petition granted for one facility could be applied nationally.
- Sticks with approach that tires and other materials from landfills and piles must be aggressively "processed" before qualifying for exemption.



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## CISWI

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- EPA proposes to set the compliance date for existing CISWI sources to run from the 5-year period from issuance of the upcoming final CISWI rule (presumably the final will be in mid-2012). Recall earlier on EPA had refused to answer questions about this issue.
- EPA proposes to reinstate its longstanding definition of "contained gaseous material" in the CISWI rules. This would make clear that landfill gas combusted as fuel in cement kilns will not be deemed a solid waste and therefore not trigger CISWI.
- Proposal would make some emission limits for existing sources in some categories less stringent, more palatable.



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## CISWI

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- Proposes a scheme for sources moving in and out of CISWI status depending upon whether and when they are combusting solid waste.
- Once again, EPA failed to address major ambiguities in the part 60 regulatory structure governing when a change at an existing facility could trigger new source CISWI status.
- EPA's own summary of changes appears in the next slides.



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## Summary of Major Changes



## Emission Limit Changes as a Result of:

- New data and revisions to the CISWI inventory for ERUs (energy recovery units) and waste-burning kilns
- Data quality assurance checks
- Review of dioxin/furan data and non-detect methodology



## Subcategory Changes

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- ERUs: PM and other CAA 129 metals now considered combustion-based pollutants for ERUs
- Waste burning kilns: long kilns and preheater / precalciner kilns further subcategorized for CO



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## Monitoring Changes

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- Removal of oxygen correction requirements for CO limits for ERUs during startup and shutdown and removal of CO CEMS requirements
- Replacement of continuous particulate matter monitoring for ERUs greater than 250 MMBtu/hr design heat input capacity with continuous parameter monitoring system requirements



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## Definition Changes

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- Revised the definition of waste-burning kiln to exclude the use of ingredients [NOTE: this is NOT what the proposed rule language says, however]
- Reinstated the definition of contained gaseous material
- Established a definition of foundry sand thermal reclamation unit



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## Notice and Comment Issues

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- In the March 21, 2011 notice, we identified seven issues affecting CISWI for which reconsideration should be granted and additional opportunity for public review and comment should be given:
  - Revision of the subcategory of energy recovery units
  - Establishment of limitations on fuel switching provisions
  - Revision of the definition of CISWI to exclude cyclonic burn barrels
  - Inclusion of an affirmative defense provision for malfunction events
  - Revisions to the carbon monoxide monitoring requirements
  - Establishment of a full-load stack test requirement for carbon monoxide coupled with continuous oxygen monitoring for CISWI units
  - Establishment of a definition of “homogeneous waste” in the CISWI rule



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# Boiler MACT



## Background

- New final Boiler MACT rule announced in February
- EPA announced administrative "reconsideration" for rule simultaneously with its issuance
- Rule (and reconsideration notice) appear in March 21, 2011 Federal Register:
  - Boiler MACT -- 76 FR 15608
  - Reconsideration -- 76 FR 15266
- Final rule was less stringent than original proposal







## Administrative and Judicial Activity

- Many industrial and environmental parties filed administrative petitions for reconsideration on Boiler MACT rules under CAA 307(d)(7)(B)
- Many industrial and environmental parties filed petitions for review in DC Circuit on Boiler MACT
- In light of ongoing reconsiderations, EPA announced indefinite stay of effective date for boiler rules. May 17, 2011 (76 FR 28318).
- New reconsideration proposal issued Dec. 2, 2011



## Boiler MACT – Affected Sources

### Affected Sources:

- All existing industrial, commercial, and institutional boilers and process heaters within a subcategory located at a major source that do not combust solid waste (as defined under RCRA)
  - includes QF small power producers and cogeneration units that combust solid waste in a homogenous waste stream
- Also includes each such new or reconstructed source





## Boiler MACT – Newly Proposed Standards

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### Standards Proposed:

(based on average of best 12% existing and best of best for new):

- Total selected metals or PM (surrogate for non-mercury metallic HAPs)
  - HCl (surrogate for acid gas HAP)
  - Hg
  - CO (surrogate for non-dioxin/furan organic HAP)
  - Dioxans/furans
- 
- Limits in Table 1 – pgs. 19-23 of proposal by subcategory
  - Emission limits for existing sources apply only to boilers and process heaters w/ designed heat input capacity > 10 million BTU per hour



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## Boiler MACT – Newly Proposed Standards

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- Optional output based standards
- Work practice standards for smaller existing boilers, Gas 1 subcategory (nat. gas/refinery gas), limited-use units, and others
- Work practice standard for all dioxin/furan emissions from all subcategories
- All existing affected boilers and process heaters – one time energy assessment to identify cost-effective conservation measures (beyond MACT floor)



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## Boiler MACT - SSM

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- No proposed changes to malfunction provisions – limits apply (76 FR 15613)
- Limits no longer apply during startup and shutdown
- Proposed revised work practice standards for startup and shutdown
  - Employ good combustion practices and demonstrate by monitoring O<sub>2</sub> concentrations (per manuf. specs)
  - Ensure that boiler operators are trained in startup and shutdown procedures
  - Recordkeeping requirements
- New definitions for “startup” and “shutdown”
  - Startup is from 0 to 25% load
  - Shutdown is 25% load to no combustion



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## Boiler MACT - Testing and Initial Compliance

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- New/existing source – must conduct performance tests to demonstrate compliance (generally initial and annual)
- Tests used to determine operating parameters (e.g., pressure drop, flow rate, etc.)
- < 10 MMBtu get work practice standards



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## Boiler MACT – Other

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- New compliance dates
  - Existing sources: 3 years from final reconsideration rule (Spring 2012)
  - New sources: 60 days after date of publication of final reconsideration rule (at startup)
  - New/existing source date the same (June 4, 2010)
- Proposal made a number of “technical” corrections



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## Boiler MACT – Still Controversial

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- EPA accepting comments for 60 days after publication
- Industry still supporting House bill to delay standards (delay of roughly 3 more years)
- Senate is also considering a bill
- Obama threatened veto
- Final rule slated for Spring 2012
- Challenges likely
- But stay lifted . . .



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## Cross-State Stay

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- Past webinars include details of rule
- Replaces Clean Air Interstate Rule (CAIR )
  - The *North Carolina* Decision
- Three programs
  - SO<sub>2</sub>
  - Annual NO<sub>x</sub>
  - Ozone-season NO<sub>x</sub> (May-Sept)
- Two-phase compliance (Jan/May 2012 and Jan. 2014)



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## Cross-State Stay

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- 45 lawsuits/petitions for review
- > 90 parties involved
- 19 motions to stay were filed
- Court granted stay – reinstated CAIR
- CSAPR unlikely to apply in 2012
- EPA to return CAIR allowances this week
- Arguments by April?



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## Questions & Answers



## Thank You!

- A copy of the PowerPoint presentation and a multimedia recording will be available on the event Website early next week  
[http://www.foley.com/news/event\\_detail.aspx?eventid=3631](http://www.foley.com/news/event_detail.aspx?eventid=3631)
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