

# JOINT COMMITTEE ON ADMINISTRATIVE RULES

ILLINOIS GENERAL ASSEMBLY

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700 STRATTON BUILDING  
SPRINGFIELD, ILLINOIS 62706  
217/785-2254

May 28, 2019



Katie Papadimitriu, Chair  
Pollution Control Board  
James R. Thompson Center  
100 W. Randolph, Suite 11-500  
Chicago IL 60601

RE: Standards Applicable to Generators of Hazardous Waste (35 Ill. Adm. Code 722; 42 Ill. Reg. 10808)

Dear Chair Papadimitriu:

In closing the above referenced file, JCAR Staff discovered numerous errors in the Board's filed rulemaking. These matters can be corrected using the Expedited Correction process or in the Board's next rulemaking on this Part.

Specifically, the errors are:

- 722.110(a)(1)(A): The period after "VSQG" should have been omitted.
- 722.110(l)(2), 1<sup>st</sup> line: The comma after "722.114" should have been stricken.
- 722.115(a)(6) should be configured as follows:

"A) Either:

- i) Comply within...; or
- ii) Remove the ...; and

B) During the...."

Mixed conjunctions in a single series can be confusing to the reader.

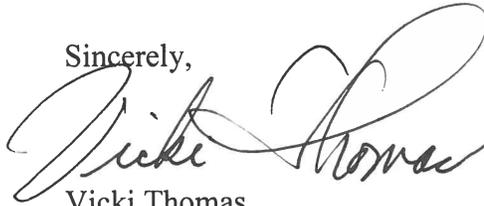
- 722.116(b)(8)(D)(ii), 3<sup>rd</sup> line: Should "direct or unimpeded access" be "direct and unimpeded access"?
- 722.116(e): The Board changed this subsection between its 1<sup>st</sup> publication and the adoption. We believe something may have gone wrong in making that change. The resultant subsection is now incomprehensible to a reader who doesn't already know

the Board's intent.

- 722.117(a)(4)(B)(i): The term "16(d) and" is not clear. 16(d) of what? Also, this subsection needs a period at the end.
- 722.181, Definition of "OECD Guidance Manual": There should not be a blank line between the definition and the accompanying Board Note. Blank lines are used in subsectioned material, but in definitions where there are no labels the note is kept tight to the text.
- 722.182(b): Why is "Trans-Boundary" hyphenated? Should it be "Transboundary", as in USEPA usage? The same question applies to (b)(2).
- 722.333(a)(2), 2<sup>nd</sup> line: After "calendar year", the period should have been a comma.
- 722.354(a) and (b): Should "direct or unimpeded access" be "direct and unimpeded access"?

If we can be of any assistance in correcting these problems, please contact Jonathan Eastvold of this staff at (217)785-2254.

Sincerely,

A handwritten signature in black ink, appearing to read "Vicki Thomas", written in a cursive style.

Vicki Thomas  
Executive Director

VT:JCE:cw

cc: Richard McGill