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From: [Klein, Martin E.](#)
To: [Brown, Don](#)
Subject: FW: [External] Question on PIMW Rules
Date: Monday, April 29, 2019 12:30:31 PM
Attachments: [image001.png](#)

Mr. Clerk:

At your earliest convenience, please file this email change in Docket R18-29.

Thank you.

From: Klein, Martin E.
Sent: Monday, April 29, 2019 12:29 PM
To: 'Mary Anne Hunter' <mhunter@blachfordinc.com>
Subject: RE: [External] Question on PIMW Rules

Good afternoon Ms. Hunter:

The Board explained the scope of the proposed rulemaking in R18-29 and summarized the proposed amendments in its first notice opinion.

The Board limited the scope of this proceeding to non-substantive revisions to the PIMW rules. Thus, the Board's proposed amendments remove legalese, redundant and superfluous language, as well as reorganize some provisions for clarity. The amendments also change citations and regulatory language to comply with the style requirements of the Illinois Administrative Code. Amendments to 35 Ill. Adm. Code Subtitle M: Biological Materials, R18-29, slip op. at 2 (Feb. 14, 2019).

The Board's opinion discussing the proposed amendments can be found at the Board's Clerks Office Online System (COOL) (pcb.illinois.gov) searching case number R18-29, and at the link below:

<https://pcb.illinois.gov/documents/dsweb/Get/Document-99671>

In addition, the Board's first notice proposed amendments can be found in COOL and using the link below:

<http://pcb.illinois.gov/Cases/GetCaseDetailsById?caseId=15564>

Any specific questions about the impact of, or compliance with, the proposed amendments should be directed to the Illinois Environmental Protection Agency or an attorney.

Also, please note that I will file your question and my response as a public comment in the docket R18-29 with the Board's Clerk.

Respectfully,

Martin E. Klein

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From: Mary Anne Hunter <mhunter@blachfordinc.com>

Sent: Monday, April 29, 2019 9:54 AM

To: Klein, Martin E. <Martin.E.Klein@illinois.gov>

Subject: [External] Question on PIMW Rules

We are a manufacturing company that has only a few first aid boxes. Several years ago, I discussed the issue of PIMW with IEPA and how it applies to manufacturing facilities that do not require, nor do we select employees to be trained for first aid.

We do offer open enrollment for first aid but the employees are not obligated or required to render assistance to others.

The answer was 'companies without a medical professional e.g. nurse or other licensed professional) are not required to implement the PIWM controls. However, if there was a severe issue, we should make every attempt to get the material cleaned up by the emergency medical services that come to the facility.'

Do the proposed revised rules specifically include or exclude companies that do not have medical staff?

Mary Anne Hunter
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