



July 20, 2020

Don A. Brown, Clerk  
Illinois Pollution Control Board  
State of Illinois Center, Suite 11-500  
100 W. Randolph St.  
Chicago IL 60601

Dear Mr. Brown:

Regarding the proposed Illinois Hazardous Waste Rules, Docket R19-15, the Illinois State Veterinary Medical Association currently objects to veterinarians and veterinary practices being included in the definition of a healthcare facility. Our members are going to qualify only as very small quantity generators and believe these regulations are overburdensome.

While we understand the importance of having rules for VSQG facilities, these rules are difficult for our veterinary practices to interpret making their obligations under the proposed rules unclear. So, we respectfully ask for clarification on the following questions:

- Which sections of the rules would apply to veterinary clinics that generate less than 220 pounds of hazardous waste per month or 2.2 pounds of acute hazardous waste per month or 220 pounds of residual?
- What is a veterinarian's recordkeeping, and reporting requirements under the proposed rule?
- Regarding the definition of aerosol cans, is it anticipated that veterinarians would have a responsibility to follow rules in this area?

Your consideration of our concerns is appreciated.

Sincerely,

*Olivia Rudolphi, DVM*

Olivia Rudolphi, DVM  
ISVMA President

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