



SOLID WASTE AGENCY OF LAKE COUNTY, IL

<i>Antioch</i>	<i>Highland Park</i>	<i>Lindenhurst</i>	<i>Third Lake</i>
<i>Bannockburn</i>	<i>Highwood</i>	<i>Long Grove</i>	<i>Tower Lakes</i>
<i>Beach Park</i>	<i>Island Lake</i>	<i>Mundelein</i>	<i>Vernon Hills</i>
<i>Deer Park</i>	<i>Kildeer</i>	<i>North Barrington</i>	<i>Volo</i>
<i>Deerfield</i>	<i>Lake Barrington</i>	<i>North Chicago</i>	<i>Wadsworth</i>
<i>Fox Lake</i>	<i>Lake Bluff</i>	<i>Park City</i>	<i>Wauconda</i>
<i>Grayslake</i>	<i>Lake County</i>	<i>Port Barrington</i>	<i>Waukegan</i>
<i>Great Lakes NTC</i>	<i>Lake Forest</i>	<i>Riverwoods</i>	<i>Winthrop Harbor</i>
<i>Green Oaks</i>	<i>Lake Villa</i>	<i>Round Lake</i>	<i>Zion</i>
<i>Gurnee</i>	<i>Lake Zurich</i>	<i>Round Lake Beach</i>	
<i>Hainesville</i>	<i>Libertyville</i>	<i>Round Lake Heights</i>	
<i>Hawthorn Woods</i>	<i>Lincolnshire</i>	<i>Round Lake Park</i>	

Barbara Flynn Currie, Chairperson
Illinois Pollution Control Board
2520 W Iles Ave
Springfield, Illinois

RE: R25-022 - Standards for Universal Waste Management (35 Ill. Adm. Code Parts 703, 720, 721, 724, 725, 728, and 733), Illinois Universal Waste Rules for Paint and Paint-Related Waste

Dear Ms. Currie,

The Solid Waste Agency of Lake County submits the following comments to the Illinois Pollution Control Board regarding the proposed rulemaking to add paint and paint-related waste to the universal waste regulations in Illinois, R25-022 - Standards for Universal Waste Management (35 Ill. Adm. Code Parts 703, 720, 721, 724, 725, 728, and 733).

Statement of Interest

The Solid Waste Agency of Lake County ("SWALCO") was formed in 1991 to implement the Lake County Solid Waste Management Plan. SWALCO is composed of 45 members—including municipalities, the County of Lake, and Great Lakes NTC--representing approximately 85% of Lake County's population. The purpose of the Solid Waste Agency of Lake County, Illinois is to implement a regional approach to solid waste management which addresses the economic, political and environmental issues in Lake County as follows:

- Implement the Lake County Solid Waste Management Plan.
- Facilitate an efficient, reliable and environmentally sound waste disposal system.
- Advise and assist SWALCO members regarding solid waste management issues.
- Educate the public regarding implications of solid waste management options.
- Identify, evaluate and disseminate information regarding techniques to reduce, reuse and recycle the amount of solid waste generated.

The goals of SWALCO are closely tied to the mission statement, with the overall goal being to provide Lake County residents with the programs and infrastructure necessary to divert as much material from final disposal as possible.

Overview of the Diversion of Paint Products

At its facility and at a variety of mobile events held throughout Lake County, SWALCO collects Household Chemical Wastes, including paints and finishes. Although technically not “hazardous,” the public frequently brings many gallons of latex paint to SWALCO for handling and disposal. Proper stewardship of these wastes mandates collection and diversion from the waste stream headed for the landfills. Accordingly, SWALCO has been working with various partners—including the American Coatings Association—to encourage coatings retailers to voluntarily accept old paints and finishes as they are an intuitive point of collection for consumers. The goal of these collection activities--as ACA said in its correspondence to you--is to divert as much of the collected material as possible away from landfills, recycle as much as possible, encourage reuse where possible, and reduce the amount of leftover paint. It is obvious how a robust network of retailers serving as collection points is critical to achieving this goal.

Concern with the Proposed Rules

This is why SWALCO is concerned about the proposed changes to the Illinois universal waste rules for paint and paint-related waste: they will deter retailers from volunteering to become collection centers for paints and finishes. If retail sites do not participate, the collection program will be simultaneously overwhelmed and diminished, leading to higher costs, less diversion of paints and finishes, and an ever increasing burden on SWALCO and other local governments to shoulder the bulk of paint collection. Thus, the last thing Illinois needs is to throw cold water on those retailers who – after much effort by SWALCO, ACA and others – have been or are otherwise warming up to the idea of collecting old paints and finishes.

As ACA pointed out in its correspondence, two provisions in the proposed universal waste rules, in particular, are likely to deter retail sites from voluntarily participating as drop-off/collection sites: 1) the 50 foot setback requirement; and 2) the notification requirement. We join with ACA in urging the removal of these two requirements that will create significant barriers to the successful implementation of a voluntary paint stewardship program.

Conclusion

SWALCO is grateful for the opportunity to provide these comments and welcomes any conversation to discuss them further. In short, we need to encourage and not discourage the voluntary collection of old paints and finishes. Elimination of these two requirements in the proposed rulemaking will enable the development of a robust paint stewardship program in Illinois without compromising environmental health or safety.

If you have questions, or if I can be of further assistance, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Walter S. Willis". The signature is fluid and cursive, with the first name "Walter" being more prominent.

Walter S. Willis, Executive Director
