

From: [Koehler, Katherine](#)
To: [Rivas, Tobias](#); [Salk, Chloe](#); [Brown, Don](#)
Cc: [Rominger, Kyle](#); [Cooperider, Jacki](#); [Srinivasaraghavan, Vishnu](#); [San Diego, Nick M](#)
Subject: RE: PCB paint and paint-related waste rules
Date: Monday, August 11, 2025 4:48:21 PM
Attachments: [image001.png](#)
[image002.png](#)

Good afternoon,

The Agency does not approve of the proposed revised language. As currently written, the language of Section 733.107(c)(1) and (c)(2) is consistent with the other Universal Waste rules (i.e., Section 733.102(c) (Batteries), Section 733.103(c) (Pesticides), Section 733.104(c) (Mercury-Containing Equipment), Section 733.105(c) (Lamps), and Section 733.106(c) (Aerosol Cans)). The Agency would rather keep the language of Section 733.107(c) consistent with the other relevant Sections than revise it and have it be the only one with different language.

Please let us know if you have any further questions.

Best,



Katherine A. Koehler (she/her)
Assistant Counsel
Land Regulatory Unit
Division of Legal Counsel
Office: 312-832-2171
Email: katherine.koehler@illinois.gov

From: San Diego, Nick M <Nick.M.SanDiego@Illinois.gov>
Sent: Monday, August 11, 2025 11:26 AM
To: Rivas, Tobias <TobiasR@ilga.gov>
Cc: Rominger, Kyle <Kyle.Rominger@Illinois.gov>; Cooperider, Jacki <Jacki.Cooperider@Illinois.gov>; Srinivasaraghavan, Vishnu <Vishnu.Srinivasaraghavan2@Illinois.gov>; Koehler, Katherine <Katherine.Koehler@Illinois.gov>
Subject: RE: PCB paint and paint-related waste rules

Thank you, Toby.

Adding in relevant Agency management and Legal staff. We will let you know by COB today.

Thanks,
Nick

Nick M. San Diego (he/him)
Deputy General Counsel



Land Regulatory Unit
Division of Legal Counsel
217-524-2859



From: Rivas, Tobias <TobiasR@ilga.gov>
Sent: Monday, August 11, 2025 11:23 AM
To: Vetterhoffer, Dana <Dana.Vetterhoffer@Illinois.gov>
Cc: San Diego, Nick M <Nick.M.SanDiego@Illinois.gov>
Subject: [External] RE: PCB paint and paint-related waste rules

Good morning,

Thank you for adding Nick. If at all possible, we would appreciate knowing whether EPA assents to this proposed revision by the end of the day today, because PCB's JCAR liaison is out of the office tomorrow and our hearing is on 8/13.

Best,

Toby Rivas
Joint Committee on Administrative Rules
(217) 785-2254
TobiasR@ilga.gov

From: Vetterhoffer, Dana <Dana.Vetterhoffer@Illinois.gov>
Sent: Monday, August 11, 2025 8:20 AM
To: Rivas, Tobias <TobiasR@ilga.gov>
Cc: San Diego, Nick M <Nick.M.SanDiego@Illinois.gov>
Subject: RE: PCB paint and paint-related waste rules

Thanks Tobias. I don't handle waste rules, but I'm cc'ing Nick San Diego, the manager of the Land Regulatory Unit.

Thanks,
Dana

From: Rivas, Tobias <TobiasR@ilga.gov>
Sent: Friday, August 8, 2025 3:36 PM
To: Vetterhoffer, Dana <Dana.Vetterhoffer@Illinois.gov>

Subject: [External] PCB paint and paint-related waste rules

Good afternoon,

Regarding PCB's proposed paint and paint-related waste rules

(<https://ilga.gov/documents/commission/jcar/SecondNotices/350733-2505220r02.pdf>), JCAR raised to PCB that the language in 733.107(c)(2) appears redundant with the language in (c)(1). PCB agreed and proposed revising the rule so that 733.107(c) would simply read: "Generation of Paint and Paint-Related Waste. Paint and paint-related waste each becomes a waste on the date it is discarded or on the date the handler decides to discard it, whichever is earlier."

PCB asked that I share this proposed revision with EPA.

Best,

Toby Rivas

Joint Committee on Administrative Rules

(217) 785-2254

TobiasR@ilga.gov

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