

From: Mike McCambridge
To: Rokosz, Susan (S.M.)
Date: 6/12/2008 9:36:37 AM
Subject: Re: R09-3

PC #1

Thank you for the "heads up" on your interest in the June 4, 2008 USEPA amendments to the F019 waste listing. I will explore with Board staff the possibility of completing this rulemaking as soon as possible.

The R09-3 RCRA Subtitle C update docket will soon be reserved for USEPA amendments that have occurred between January 1, 2008 and June 30, 2008. I have taken a preliminary look at the USEPA actions included in that docket to date. They include actions of January 2, 2008, April 8, 2008, and June 4, 2008 (the one in which you expressed an interest). The volume of amendments included in these three USEPA actions is relatively light, and incorporating these federal revisions into the Illinois rules will require opening only six provisions. This should allow fairly rapid assembly of a proposal for public comment.

Of course, the update period will not run for another two weeks or so, and any further USEPA actions could increase the volume of the amendments and the difficulty and time involved in assembling a proposal.

I will note, however, that by statute, the due date for Board adoption of the R09-3 amendments is one year from January 2, 2008. Fulfillment of this deadline will require the Board to adopt a proposal for public comment by September 4, 2008 that would include the amendments.

As described, two factors will prevent my immediate attention to assembling a proposal for public comment: I will be out of the office for two weeks or more for medical reasons, and I need to attend to an already overdue, complex proposal in another docket. How quickly I can begin work on the R09-3 docket is subject to these limitations.

I will direct that a copy is introduced into the R09-3 docket as a public comment, in order to document your interest and my response for the record, as is required by Illinois law.

After some determination of a possible target date for a proposal for public comment, based on priorities and available resources, I may have more information that I can give you. As for now, however, I can add nothing further until after I have returned to the office, which I hope is no later than June 30, 2008.

Michael J. McCambridge
Attorney
Illinois Pollution Control Board
312-814-6924

>>> "Rokosz, Susan (S.M.)" <srokosz@ford.com> 6/9/2008 12:57 PM >>>
Dear Mike,

As we discussed on the phone, can you please let me know when you have completed your assessment of R09-3? Ford is very interested in taking advantage of EPA's June 4 final rule exempting wastewater treatment sludge from the zinc phosphating of aluminum parts at automotive assembly plants from the F019 hazardous waste listing.

Thank you,

Sue Rokosz
Ford Motor Company
Environmental Quality Office
313-322-3826