



December 20, 2019

Clerk's Office
Illinois Pollution Control Board
JRTC 100 W. Randolph St., Suite 11-500
Chicago, IL 60601

Submitted via email: Don.Brown@illinois.gov

Re: Docket R19-18

Stericycle is a publically traded corporation (NASDAQ: SRCL) based in Lake Forest, Illinois. In 2018, we had estimated revenues of approximately \$3.5B. We operate over 250 medical and hazardous waste facilities providing services for customers throughout the U.S. primarily in the healthcare field. Our services include compliant collection, transportation and treatment of potentially infectious medical waste (PIMW), pharmaceutical waste and hazardous waste, as well as secure document destruction. In the State of Illinois, Stericycle operates a PIMW incinerator in Clinton, PIMW transfer station in Itasca, secure document destruction facilities in Orland Park and Schiller Park, mobile document destruction facility in Springfield, healthcare services distribution center in Aurora, as well as call and customer service centers in Northbrook, Bannockburn, and Chicago. In all there are over 1000 employees in the state throughout our different divisions servicing Illinois businesses. Our corporate vision is "Protecting What Matters".

Stericycle, Inc. (Stericycle) appreciates and supports the undertaking by the Illinois Environmental Protection Agency (the Agency) and the Illinois Pollution Control Board (the Board) for working to solve the issue of using a Uniform Hazardous Waste Manifest for shipment of special wastes in Illinois. As a hauler of both hazardous and non-hazardous special wastes, the adoption of The United States Environmental Protection Agency's (USEPA) electronic manifest (e-Manifest) Act has impacted us financially and increased administrative burden to our transportation and disposal facilities that receive these wastes nationwide. The proposed changes to 35 Ill. Admin. Code 809, specifically 809.103 and 809.501, are helpful in easing this burden. However, some of the proposed language is not clear and we seek clarification or amended language on the follow two points.

First, the proposed changes to 809.501(c) state that the manifest used for nonhazardous special waste will consist of "forms prescribed by the Agency, provided that the forms must comply with the requirements of Section 22.01 of the Act and may be purchased from a third party." However, Section 22.01 of the Act does not provide any requirements, nor does the remainder of 35 Ill. Admin. Code 809 provide information on a form. We ask that a new form does not get prescribed and that haulers have the ability to use forms that are already in use and are commercially available for shipment of nonhazardous wastes. This would allow haulers to use their existing forms for nonhazardous waste shipments, since they have already designed shipping document printing systems to accommodate with standardized templates. Allowing the use of commercially available bills of lading and shipping documents would eliminate the need for system changes and development for new printing templates and would also eliminate a potential administrative and financial burden of modifying these existing systems to accommodate a newly prescribed form. If the Agency or Board want to prescribe criteria that a nonhazardous special waste manifest should contain, we ask that reference be made to the definition of "Manifest" found in 809.501, and that the form identify "...name, quantity, and the origin, routing, and destination of special waste during its transportation from the point of generation to the point of disposal, treatment, or storage..."



Second, we ask that the Agency or Board clarify or confirm that a uniform hazardous waste manifest prescribed by USEPA can still be used for shipments of nonhazardous special wastes. An example of a situation where a hauler would want to use a hazardous waste manifest from USEPA would be for hauling both hazardous and nonhazardous special wastes from a generator site. Using the hazardous waste manifest for both waste types, which is required by USEPA for hazardous waste, would eliminate the need for preparing a second manifest for the nonhazardous waste. Today, the USEPA, The United States Department of Transportation (USDOT), and other states, allow for shipment of nonhazardous wastes on hazardous waste manifests and we ask that the Agency and Board allow for this as well. The draft language in 809.501(c) seems to imply that the USEPA's manifest is to be used for hazardous waste but it is not clear if it can be used for nonhazardous waste as well. We propose the following verbiage to clarify both of the concerns we have raised in these comments:

“For hazardous waste, the manifest will consist of forms prescribed by USEPA for the Uniform Hazardous Waste Manifest and will be distributed in compliance with those requirements. For nonhazardous special waste, the manifest will consist of forms ~~prescribed by the Agency~~ that identify the name, quantity, and the origin, routing, or destination of special waste during its transportation from the point of generation to the point of disposal, treatment, or storage. A form prescribed by USEPA for the Uniform Hazardous Waste Manifest may also be used for shipments of nonhazardous special waste.”

We appreciate the opportunity to submit comments on this important rule. If you have any further questions or comments please feel free to contact me at 612-590-5039 or via email at wscheel@stericycle.com; or contact my colleague Cara Simaga at 312-720-6213 or via email csimaga@stericycle.com

Sincerely,

A handwritten signature in black ink that reads "WScheel".

Wade Scheel, Director of Governmental Affairs

Stericycle, Inc.