



February 4, 2020

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

Re: Docket R19-18 – Special Waste

Filed Electronically

Clean Harbors is North America's leading provider of environmental, energy and industrial services. The Company serves a diverse customer base, including a majority of Fortune 500 companies. Its customer base spans a number of industries, including chemical, energy and manufacturing, as well as numerous government agencies. These customers rely on Clean Harbors to deliver a broad range of services such as end-to-end hazardous waste management, emergency spill response, industrial cleaning and maintenance, and recycling services. Through its Safety-Kleen subsidiary, Clean Harbors also is North America's largest re-refiner and recycler of used oil and a leading provider of parts washers and environmental services to commercial, industrial and automotive customers. Founded in 1980 and based in Massachusetts, Clean Harbors operates throughout the United States, Canada, Mexico and Puerto Rico.

Clean Harbors, Safety-Kleen and our subsidiaries operate twelve locations in Illinois which would be impacted by this change. These locations service more than 3,300 Illinois customers as well as many more outside of Illinois who ship waste to one of our permitted waste receiving locations in the State.

Eliminating the requirement to utilize a Uniform Hazardous Waste Manifest for non-RCRA IL Special Waste would decrease the financial and regulatory burden on our company and our customers by more than 10,000 records annually. The elimination of the requirement to use a US manifest and the associated e-manifest fees for non-hazardous waste will be a welcome change we and our customers are eagerly anticipating.

Comments on Section 809.501(c)

Regarding the proposed non-hazardous special waste manifest, we request that a form is not prescribed by the Agency. We request the agency modify the proposed rule to allow the use of any form that meets the requirements in 809.501(b)

Clean Harbors and subsidiaries currently utilize USDOT compliant non-hazardous manifests or a similar bill of lading to ship non-RCRA materials throughout the USA where allowed by regulations. These existing forms meet all the criteria found in 809.501(b) and systems are already in place to print, track and collect the shipment data from these documents. Giving shippers this flexibility will eliminate the burden of obtaining, distributing and inventorying an additional form only used for shipments to/from



Illinois as well as virtually eliminate implementation delays that would otherwise be required to allow time to modify computer systems for a new form. Modifications to our computer systems for a new form would require computer code changes and a significant testing effort. Since reporting for non-RCRA IL special waste shipments is compiled from shipment data and submitted electronically, the layout of that data on a paper form is inconsequential for reporting purposes. No forms are submitted for reporting. We feel the benefits of a standardized form are outweighed by the burden imposed.

We appreciate the opportunity to comment on our behalf and the behalf of our customers. If you have any questions or comments, please contact William Connors at 781-792-5169 or by e-mail at connorsw@cleanharbors.com or Ben Smith at 847-468-6725 or by e-mail at smith.ben@cleanharbors.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. Smith".

Ben Smith
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