



PIASA PALISADES GROUP

Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W Randolph St Ste 11-500
Chicago, IL 60601-3233

April 17, 2000

RE: R00-20

Dear IPCB:

Thank you for the opportunity to comment on your proposed procedural rules. While I did not comment on the old draft rules during the comment period, I did comment on them in my first brief in Siting Permit Appeal PCB 98-43. The following are our comments:

Section 101.302(g): The requirement to file on recycled paper should be modified to allow filing on recycled paper or alternative fiber paper. Alternative fiber paper should be defined in the definitions as “paper made from tree-free fiber such as hemp or kenaf.” Alternative fiber paper has less environmental impact than paper made from forests. For additional information on tree-free paper see www.rethinkpaper.org and select solutions. The Board should also consider allowing the use of salvaged paper. Salvaged paper should be defined as “printing or copying on the back of waste paper that was only printed on one side.”

Section 101.302(h): The Board should allow electronic filing without any paper copies. While the Board indicated it is not ready to go to electronic filing, at the minimum, the Board should reduce the number of paper copies required if an electronic copy is submitted. Certainly, some of the ten copies could be eliminated if the Board receives an electronic copy. The Board should allow electronic copies in formats such as Adobe Acrobat, WordPerfect, and Word. Even recycled paper and alternative fiber paper causes environmental harm. The Board should be working to greatly reduce paper usage. The three Rs are **reduce**, reuse, and recycle. The Board needs to consider the amount of forest destruction and pollution the paper copies cause. The Board will be responsible for this environmental destruction and pollution if it does not reduce the required number of paper copies.



Section 101.302: A provision should be added requiring all copies to be printed on both sides (unless it is on salvaged paper).

Section 101.302: It appears that the Board has eliminated the requirement of the existing rule for double spacing. The final rule should allow single spacing as this saves paper which protects forests and reduces pollution.

Section 101.304: The rules should allow service by Email if the party to be served agrees to this method of service. The rules should require material served on other parties electronically or if served on paper to be served on either recycled, alternative fiber, or salvaged paper. Double sided copies should be required for recycled and alternative fiber paper.

Section 101.604: The transcript should be required to be posted on the Board's Internet site. The time to file a motion to correct should start when it is posted on the Internet. Corrections at a latter date should be allowed for good cause.

Section 107.206(b): The rules should be more specific on who to serve. For example, the rules should specify who to serve for the siting authority. Is it their attorney, the clerk, or someone else? For a company, is it their registered agent, their attorney, or someone else? We would suggest that the Board require that when a company submits an application for siting, that the application be required to give the name and address of the person to serve. The citing decision should also be required to contain the name and address of who to serve for the siting authority. Citizens can file appeals and many citizens do not know how to properly serve the other parties.

Sincerely,



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