

Electronic Filing: Received, Clerk's Office 03/25/2026 P.C. #13

From: [McGill, Richard](#)
To: [Brown, Don](#)
Cc: [Paruchuri, Anupama](#); [Bilbruck, Shannon O.](#)
Subject: FW: Style changes in upcoming PCB rulemakings
Date: Wednesday, March 25, 2026 4:27:54 PM

Good afternoon, Mr. Clerk,

Please docket this email exchange with JCAR staff as a public comment in R18-21.

Thank you.

Richard R. McGill, Jr.

Senior Attorney for Research & Writing

Illinois Pollution Control Board

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richard.mcgill@illinois.gov



From: McGill, Richard
Sent: Tuesday, March 24, 2026 11:54 AM
To: Rivas, Tobias <tobiasr@ilga.gov>
Subject: RE: Style changes in upcoming PCB rulemakings

Good morning, Toby,

Thanks, feeling 100%. I appreciate your patience in awaiting my response.

We'll change "USC" back to "U.S.C." That was an oversight.

As for the punctuation to separate listed items in a sentence lacking alphanumeric subsection labels, three scenarios come to mind in which we would typically propose using semicolons instead of commas. The first would be when a listed item itself contains a comma, *i.e.*, an "internal comma." The second would be when a listed item contains a qualifier intended to apply only to that listed item, *i.e.*, not to any subsequent or prior item in the list. And the third would be when the items in a list are particularly complex or lengthy. Generally, in each of these scenarios, because the semicolon operates at a hierarchically higher level of punctuation than the comma, semicolons more clearly demarcate the listed items. Of course, these scenarios may overlap and there could be wrinkles in a specific rule.

In this rulemaking, our proposed replacements of commas with semicolons as list separators are intended to clarify the rule text for the reader and do so without effectuating any substantive change. We'll remain mindful of this as the rulemaking proceeds but if you have any specific instances that appear to either introduce ambiguity or change substance, please let me know.

Thank you.

Best regards,

Richard

Richard R. McGill, Jr.

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From: Rivas, Tobias <TobiasR@ilga.gov>
Sent: Friday, March 20, 2026 8:42 AM
To: McGill, Richard <Richard.McGill@illinois.gov>
Subject: [External] RE: Style changes in upcoming PCB rulemakings

Good morning,

I hope you feel better. They are 35 IAC 201, 202, 205, 207, 211, 212, 214, 228, 232, 241, 243, 244, 245, and 249.

Toby

From: McGill, Richard <Richard.McGill@illinois.gov>
Sent: Thursday, March 19, 2026 4:40 PM
To: Rivas, Tobias <TobiasR@ilga.gov>
Subject: Re: Style changes in upcoming PCB rulemakings

Good afternoon, Toby,

I'm out ill today but would be pleased to follow up. Would you please identify the 35 IAC Parts at issue? Thank you.

Best regards

Richard

Richard R. McGill, Jr.

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From: Rivas, Tobias <TobiasR@ilga.gov>

Sent: Thursday, March 19, 2026 4:01 PM

To: McGill, Richard <Richard.McGill@illinois.gov>

Subject: [External] Style changes in upcoming PCB rulemakings

Good afternoon, Richard,

In the rulemakings PCB recently sent us for pre-review, there are two stylistic changes made throughout that we're curious about. First, "U.S.C." is changed to "USC". But the SOS style manual

(https://www.ilsos.gov/content/dam/publications/pdf_publications/admin_code_style_manual.pdf

pp. 16) says that "U.S.C." should be used. Is this an oversight on PCB's part, or is there a specific reason that "USC" is appropriate here? Second, comma-separated lists are converted to semicolon-separated lists throughout. Is there a particular reason for this change?

Best,

Toby Armas-Rivas

Joint Committee on Administrative Rules

(217) 785-2254

TobiasR@ilga.gov

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