Stericycle

August 22, 2018

ILLINOIS POLLUTION CONTROL BOARD
Submitted Electronically to the Hearing Officer: Martin.E.Klein@Illinois.Gov

Re: Amendments to 35 Ill.Adm.Code Subtitle M: Biological Materials, Rulemaking 18-29

Stericycle, Inc. (Stericycle) appreciates the opportunity to provide input on the Illinois Pollution Control Board's (the Board) proposed amendments to the Potentially Infectious Medical Waste (PIMW) rules. The Board notes that the PIMW rules have not been amended since their adoption in 1993 and thus the Board has recognized that these rules are no longer current and in need of streamline, updating and an overhaul. We support this rulemaking and would like to have opportunity to provide valuable input regarding our area of specialized expertise specific to the safe and proper management, treatment and disposal of PIMW.

Stericycle is a publically traded corporation (NASDAQ: SRCL) based in Lake Forest, Illinois. In 2016, we had estimated revenues of approximately $3.56B. 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 medical waste, 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 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 has been operating these facilities under the current PIMW rules and other applicable Federal regulations (Environmental Protection Agency (EPA), Department of Transportation (DOT), and Occupational Safety and Health Administration for example) since the commencement of these facilities. We believe that changes in the industry and advancement of practices and technology merit changes in the rules. Stericycle has worked with other regulatory agencies in modifications to their regulated medical waste regulations across the country. Some best management practices and advances we have worked on, and that we recommend the Board consider, include:

- Updating the regulations for references to the current federal regulations that are applicable, duplicative and in some cases pre-emptive. We would strongly recommend that the Board consider updating their sources and publications referenced in the rules (per questions 2. *Do the sources relied on in the Board's Note need to be updated or supplemented?* And 3. *Does the list of publications need to be updated by adding a publication, removing a publication, or replacing a listed publication with a more current version?)*
- Highly infectious diseases: section addressing the management of wastes generated in the state which are considered Category A infectious substances per DOT regulations if transported off site for treatment (per question 1. *Is the list of viral agents complete and consistent with current Center for Disease Control and National Institute of Health listings?).* An example would be waste from patients with Ebola. Stericycle was involved in collection and management of Ebola patient waste in 2014 and we encourage all States to consider such situations in the regulations and consider best management practices.

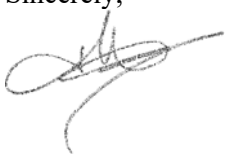
Stericycle

- Recommend a new section of rules specific to home-generated medical wastes such as sharps and pharmaceuticals as opioid/prescription drug abuse continues to be a challenge in the state. This has increasingly become a major problem in the State and new legislation has passed; the regulations need to be updated to reflect the legislative changes.
- Consider waste streams emerging and changing in healthcare: New and/or updated collection and management standards for non-RCRA pharmaceutical wastes, trace chemotherapy wastes, and pathological wastes

Stericycle asks the Board to consider a more in-depth stakeholder process to assist with this rulemaking. We would welcome the opportunity to work with the Board, and other stakeholders, in a collaborative effort to make the modifications and clarifications needed to update and improve the regulations. We intend to attend the public hearing on September 11, 2018. Members of the Stericycle Safety, Health and Compliance team will be present to provide this testimony.

Should you have any further questions or comments please feel free to contact me at 847-943-6685 or via email at shoboy@stericycle.com.

Sincerely,



Selin Hoboy
VP of Legislative and Regulatory Affairs
Stericycle, Inc.