From:
 McGill, Richard

 To:
 Brown, Don

 Cc:
 McCambridge, Michael

 Subject:
 another PC for R19-3

Date: Thursday, November 1, 2018 2:57:02 PM

Attachments: R19-3 Differences between Board and JCAR As-Adopted Text.docx

Good afternoon again, Mr. Clerk!

Please docket this forwarded email correspondence (and the attached Word document) as a public comment in docket R19-3.

If you have any questions, please let me know. Thank you.

Richard R. McGill, Jr.
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312-814-6983
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From: McGill, Richard

Sent: Thursday, November 1, 2018 2:55 PM **To:** 'JonathanE@ilga.gov' <JonathanE@ilga.gov> **Subject:** exempt 35 IAC 720-725 differences R19-3

Hello again, Jonathan:

The attached document describes the differences we found between JCAR Code text and Board "as-adopted" text.

Please let me know if you have any questions. Thank you.

Best regards,

Richard

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R19-3 Differences between Board Text and JCAR Text

Not including differences that will no longer exist upon Board correction of the rule for adoption.

- <u>720 table of contents, 720.109 heading</u>: JCAR text lacks "(Renumbered)," which SOS staff requested that the Board add.
- 720 table of contents, 720.131 heading: JCAR text still has "and Verified Facility," which SOS staff requested that the Board add.
- <u>720 source note</u>: JCAR text does not have the entry for R17-12/R17-15/R18-12/R18-31 (which the Board has not yet filed).
- <u>720.109 heading</u>: JCAR text lacks "(Renumbered)," which SOS staff requested that the Board add.
- 720.109(a)(2)(B)(i): JCAR text retains "Board's Clerk's Office," which the Board changes to "Clerk's Office" on adoption at the request of JCAR.
- 720.109(a)(4): JCAR text references nonexistent subsection (a)(2)(B)(iii), which the Board corrects to subsection (a)(2)(B) on adoption.
- 720.109(c): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed). JCAR text retains "of this Section" (which the Board removed in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- <u>720.109(d)</u>: JCAR text does not have the topical subheading in title case and retains the ending period (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- <u>720.109(e)</u>: JCAR text does not have the topical subheading in title case and retains the ending period (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- <u>720.109(d)</u>: JCAR text does not have the topical subheading in title case and retains the ending period (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 720.109(e) Board note: JCAR text adds the version "(2017)" to the *Code of Federal Regulations* citation (which the Board added in the R17-12/R17-15/R18-12/R18-31 update but omitted from the R19-3 proposal), which the Board adds as "(2018)" on adoption.
- 720.109(f): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 720.111(a), ACI: JCAR does not change "Michigan" to "MI" (which the Board did in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).

- 720.111(a), ACI: JCAR does not change "New York" to "NY" (which the Board did in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- <u>720.111(a)</u>, <u>API</u>: JCAR does not change "Washington, D.C." to "Washington, DC" (which the Board did in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 720.111(a), GPO: JCAR does not change "Washington, D.C." to "Washington, DC" (which the Board did in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 720.111(a), GPO: JCAR text adds a comma in "(August, 1993)" that is not in text on file.
- 720.111(a), ISO: JCAR text does not include the entry (which the Board added in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 720.111(a), NFPA: JCAR text not include entries for the 1977 and 1981 editions of NFPA 30 (which the Board added in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed). The entries for the 1987 and 2003 versions of NFPA 30 do not include a reference to 722.116 (which the Board added in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed). JCAR text does not include the reference to NFPA 704 (which the Board added in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed)
- 720.111(a), USDOD Board note: JCAR text omits the space in "2890are." JCAR adds a space before the ending period after the virgule.
- 720.111(a), USEPA, Office of Ground Water and Surface Water: JCAR does not change "Washington, D.C." to "Washington, DC" (which the Board did in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 720.111(a), USEPA Region 6: JCAR text has an en-dash offset by spaces in place of the emdash in "EPA RCRA Delisting Program—Guidance Manual for the Petitioner."
- 720.111(b): JCAR does not change "Washington, D.C." to "Washington, DC" (which the Board did in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed). JCAR text omits entries for 15 CFR 30.4(b) and 30.6, 29 CFR 1910.1200, and subpart E of 49 CFR 172 (which the Board added in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed). JCAR text relies on the 2017 versions instead of the 2018 versions of many *Code of Federal Regulations* provisions (many of which the Board added in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed; others of which the Board is updating on adoption). JCAR's entry for subpart B of 40 CFR 257 refers to 721.105 instead of 722.114 (which the Board erroneously deleted in the R17-12/R17-15/R18-12/R18-31 and updates on adoption). JCAR text includes entries for 40 CFR 262.53 through 262.57 (which the Board deleted in the R17-12/R17-15/R18-31 update, which the Board has not yet filed). JCAR text has "Section 264.18(a)" instead of "§ 264.18(a)" in the appendix title in the entry for appendix VI to 40 CFR 264. JCAR text places the entry for subpart FF or 40 CFR 264 after the entry for

appendix VI to 40 CFR 264, while the Board is moving it to follow the entry for 40 CFR 262.1316 on adoption. JCAR text has a second set of entries for 40 CFR 264.1311 through 264.1316, which the Board is correcting to 40 CFR 265.1311 through 265.1316. The entry for table to 49 CFR 172.101 in the JCAR text has "referenced in 35 III. Adm. 49 CFR 172.304, referenced in 35 III. Adm. Code 721.104," omitting references to 722.183, 722.184, 724.112, and 725.112. (The Board is correcting the text to "referenced in 35 III. Adm. Code 721.104, 722.183, 722.184, 724.112, and 725.112" on adoption. JCAR text uses en-dashes offset by spaces, rather than em-dashes, in the entries for 49 CFR 173, 173.50, 173.115, and 173.127.

- 721 table of contents, 721.105 heading: JCAR text lacks "(Repealed)" (which the Board added in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721 table of contents, 721.Appendix Y heading: JCAR text lacks "(Repealed)" (which the Board added in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- <u>721 source note</u>: JCAR text does not have the entry for R17-12/R17-15/R18-12/R18-31 (which the Board has not yet filed).
- 721.104(a): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- <u>721.104(a)(7)</u>: JCAR text has "unless it is accumulated speculatively," which the Board changed to "provided it is not accumulated speculatively" at the request of JCAR in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- 721.104(a)(20)(B)(ii): JCAR text changes the ending period in text on file to a colon.
- 721.104(a)(23): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(a)(23)(A): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- <u>721.104(a)(23)(B)</u>: JCAR text does not have the topical subheading in title case and retained the ending period (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(a)(24): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(a)(24)(E)(ii): JCAR text omits the space in "facilitywhere." JCAR text has a comma before "the facility must," which the Board removes on adoption.
- 721.104(a)(24)(E)(iii): JCAR text retains "under" before "a RCRA permit," which JCAR requested that the Board remove on adoption. JCAR text retains "a regulatory authority," which the Board changes to "USEPA or the Agency" (twice) on adoption at the request

- of JCAR. JCAR substitutes parentheses for the square brackets in the quoted certification statement.
- 721.104(a)(24)(H)(ii): JCAR text retains "USEPA or the state," which the Board changes to "USEPA or the Agency" on adoption at the request of JCAR.
- 721.104(a)(25): JCAR text retains "subsections (a)(24)(A) through (a)(24)(E)," which the Board changes to "subsections (a)(24)(A) through (a)(24)(E) and (a)(24)(H)" on adoption at the request of JCAR.
- 721.104(a)(25)(A)(ii): JCAR text retains "material was managed," which the Board changes to "material were managed" on adoption at the request of JCAR.
- 721.104(a)(25)(A)(vi): JCAR text omits the final "etc." in "(e.g., mode of transportation vehicle (air, highway, rail, water, etc.), types of container (drums, boxes, tanks, etc.), etc.)," which the Board adds on adoption.
- 721.104(a)(25)(D): JCAR text retains "which a country of import requests," which the Board changes to "that a country of import requests" on adoption at the request of JCAR.
- 721.104(a)(25)(E): JCAR text retains "which USEPA determines," which the Board changes to "that USEPA determines" on adoption at the request of JCAR. JCAR text retains "where a claim of confidentiality," which the Board changes to "when a claim of confidentiality" on adoption at the request of JCAR.
- <u>721.104(a)(25)(F)</u>: JCAR text retains "where the country of import," which the Board changes to "when the country of import" on adoption at the request of JCAR.
- 721.104(a)(25)(G): JCAR text retains "OECD Member countries," which the Board changes to "OECD member countries" on adoption at the request of JCAR. JCAR text has "shipment and which are thus," which the Board changes to "shipment, and are thus" on adoption.
- 721.104(a)(25)(I): JCAR text retains "if the shipment," which the Board changes to "if a shipment" on adoption at the request of JCAR.
- 721.104(a)(25)(J): JCAR text has "if they can demonstrate," which the Board changes to "if it can demonstrate" on adoption.
- 721.104(a)(25)(K): JCAR text has "the Administrator," which the Board changes to "USEPA" on adoption.
- 721.104(a)(25)(K)(iv): JCAR text retains "material was managed," which the Board changes to "material were managed" on adoption at the request of JCAR. JCAR text has "where applicable," which the Board changes to "if applicable" on adoption.

- 721.104(a)(25)(K)(iv): JCAR text omits commas from "that, based on" and "information, including," which the Board adds on adoption at the request of JCAR. JCAR text has "where applicable," which the Board changes to "if applicable" on adoption.
- 721.104(a)(27)(A): JCAR removed the soft hyphens from the chemical names "ethylbenzene," "trimethylbenzene," "chlorobenzene," "cyclohexane," "acetonitrile," "chloroform," "chloromethane," "isobutyl ketone," and "dimethylformamide," which the Board added to facilitate breaking the names on line breaks. JCAR text has replaced the soft-hyphens in the chemical names "dichloromethane" and tetrahydrofuran" with hard-hyphens in "dichloro-methane" and "tetra-hydrofuran," which will always display notwithstanding where in the text.
- 721.104(b): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(b)(4): JCAR text does not have the topical subheading in title case and retains the ending period (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(b)(4)(A)(i): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(b)(4)(A)(ii): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(b)(4)(A)(iii): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(b)(4)(A)(iv): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(b)(4)(A)(v): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(b)(4)(A)(vi): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(b)(4)(A)(vii): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(b)(4)(A)(viii): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- <u>721.104(b)(6)</u>: JCAR text does not have the topical subheading in title case and retains the ending comma (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).

- 721.104(b)(7)(B)(xvii): JCAR text has "open hearth," which the Board changes to "openhearth" on adoption.
- 721.104(b)(7)(B)(xviii): JCAR text has "open hearth," which the Board changes to "openhearth" on adoption.
- <u>721.104(b)(12)</u>: JCAR removed the soft hyphens from the chemical names "chlorofluorocarbon" and "chlorofluorocarbons," which the Board added to facilitate breaking the names on line breaks.
- <u>721.104(c)</u>: JCAR text does not have the topical subheading in title case, which the Board changes on adoption.
- <u>721.104(d)</u>: JCAR text retains the ending period in the topical subheading (removed by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(d)(1): JCAR text has "subsection (d)(2)" (which the Board changed to "subsections (d)(2) and (d)(4)" in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(d)(4): JCAR text does not have the provision (added by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- <u>721.104(e)</u>: JCAR text does not have the topical subheading in title case and retains the ending period (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(e)(1): JCAR text has "subsection (e)(2)" (which the Board changed to "subsections (e)(2) and (e)(4)" in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed). JCAR text has "Section 721.105 and 35 Ill. Adm. Code 722.134(d)" (which the Board changed to "35 Ill. Adm. Code 722.114 and 722.116" in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(e)(4): JCAR text does not have the provision (added by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(e)(5): JCAR text has this as subsection (e)(4) (which the Board renumbered (e)(5) in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(g): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- <u>721.104(h)</u>: JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 721.104(h)(4): JCAR text retains the ending period in the topical subheading (which the Board removed in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).

- 722 table of contents: JCAR text lacks entries for 722.101, 722.105, 722.114 through 722.118, which the Board added in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed). The entries in the JCAR text for 722.135, 722.144, 722.183, and 722.184 omit revisions the Board made in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed). The JCAR text has headings for Subparts E and F, which were removed by recodification on June 22, 2018. The JCAR entries for 722.150 through 722.160 and 722.185 through 722.189 omit "(Repealed)," which the Board added in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed). The JCAR text omits all entries for Subparts L and M, which the Board added in the R17-12/R17-15/R18-31 update (which the Board has not yet filed).
- <u>722 source note</u>: JCAR text does not have the entry for R17-12/R17-15/R18-12/R18-31 (which the Board has not yet filed).
- <u>722.120(a)</u>: JCAR text does not have the topical subheading in title case and retains the ending period (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 722.120(a)(1): JCAR text does not include revisions made by the Board in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- <u>722.120(b)</u>: JCAR text does not include revisions made by the Board in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- <u>722.120(c)</u>: JCAR text does not include revisions made by the Board in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- <u>722.120(d)</u>: JCAR text does not include revisions made by the Board in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- 722.120(e)(3): JCAR text does not include revisions made by the Board in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- <u>722.121</u>: JCAR text does not have the text as the Board revises it for adoption, replacing the entire text of subsections (a) through (f) with explanatory text in subsection (a) and moving the revised text of subsection (g) into subsection (b)
- <u>722.124(a)</u>: JCAR text does not have the topical subheading in title case and retains the ending period (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 722.124(a) Board note: JCAR text has "40 CFR 722.124(a) ad (a)(1) through (a)(3)," which the Board corrected to "35 Ill. Adm. Code 722.124(a) ad (a)(1) through (a)(3)" in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- <u>722.124(d)</u>: JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).

- <u>722.124(e)</u>: JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 722.124(f): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- <u>723 source note</u>: JCAR text does not have the entry for R17-12/R17-15/R18-12/R18-31 (which the Board has not yet filed). JCAR text has "R19-2," which the Board corrects to "R19-3" on adoption.
- <u>723.120(a)</u>: JCAR text does not have the topical subheading in title case and retains the ending period (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 723.120(a)(1): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 723.120(a)(2): JCAR text does not include revisions adopted by the Board in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- 723.120(a)(4): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 723.120(a)(4) Board note: JCAR text has "corresponding 40 CFR 723.20(a)(4)(A) through (a)(4)(D)" instead of "corresponding 40 CFR 263.20(a)(4)(i) through (a)(4)(iv)" (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 723.120(a)(6): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 723.120(a)(6)(A): JCAR text has a comma after "subsection (a)(4)(C)(i)" (deleted by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 723.120(a)(7): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 723.120(c): JCAR text does not include revisions adopted by the Board in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- 723.120(e)(2): JCAR text does not include revisions adopted by the Board in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- 723.120(f)(1)(C)(iii): JCAR text omits the ending conjunction "and," which the Board adds at the request of JCAR on adoption.
- 723.120(f)(2): JCAR text does not include revisions adopted by the Board in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).

- 723.120(f)(2) Board note: JCAR text has "sign either the manifest or shipping paper," which the Board change to "sign the manifest, movement document, or shipping paper" in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- 723.120(g)(4): JCAR text does not include the provision added by the Board in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- 723.120(h)(2)(A): JCAR text has "35 Ill. Adm. Code 722.118," which the Board change to "35 Ill. Adm. Code 722.112" in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- 723.121(b): JCAR text retains the ending period in the topical subheading (removed by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 723.121(b)(2)(A): JCAR text retains the ending semicolon and ending conjunction "or," which the Board changes to a period at the request of JCAR on adoption.
- 723.121(b)(2)(B): JCAR text retains the ending semicolon and ending conjunction "and," which the Board changes to a period at the request of JCAR on adoption.
- <u>723.121(c)(2)</u>: JCAR text has a comma before "and give a copy," which the Board removes on adoption.
- 724 table of contents: The entries in the JCAR text for 724.933, 724.934, 724.1201 and 724.1202 omit revisions the Board made in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- <u>724 source note</u>: JCAR text does not have the entry for R17-12/R17-15/R18-12/R18-31 (which the Board has not yet filed). JCAR text has "R19-2," which the Board corrects to "R19-3" on adoption.
- <u>724.171(a)</u>: JCAR text retains the ending period in the topical subheading (removed by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 724.171(a)(2)(E)(ii): JCAR text has "USEPA system" (twice), which the Board changes to "e-Manifest System" (twice) on adoption. JCAR text has "in e-Manifest," which the Board changes to "in the e-Manifest System" on adoption.
- <u>724.171(a)(3)</u>: JCAR text does not include revisions adopted by the Board in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- 724.171(c) and Board note: JCAR text does not include revisions adopted by the Board in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- 724.171(d): JCAR text does not include revisions adopted by the Board in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).

- 724.171(i): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- <u>724.171(j)</u>: JCAR text retains the ending period in the topical subheading (removed by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- <u>724.171(1)</u>: JCAR text has "corrections may be submitted," which the Board changes to "corrections it may submit" on adoption.
- <u>724.986(b)</u>: JCAR text retains the ending period in the topical subheading (removed by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- <u>724.986(c)</u>: JCAR text does not have the topical subheading in title case and retains the ending period (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 724.986(d): JCAR text retains the ending period in the topical subheading (removed by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 724.986(d)(3)(A)(ii): JCAR text has an inappropriate comma before "being filled to the intended final level," which does not appear in text on file.
- 724.986(d)(4)(A): JCAR text has "in the case when," where "if" appears in text on file.
- <u>724.986(e)</u>: JCAR text retains the ending period in the topical subheading (removed by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 724.986(e)(2)(A): JCAR text has an en-dash offset by spaces in place of the em-dash (twice) in "Procedure T—Criteria for and Verification of a Permanent or Temporary Total Enclosure." JCAR text omits a comma after "Procedure T—Criteria for and Verification of a Permanent or Temporary Total Enclosure" that appears in text on file and which is necessary to offset the parenthetical.
- <u>724.986(f)(2)</u>: JCAR text has an en-dash offset by spaces in place of the em-dash (twice) in "Shippers—General Requirements for Shipments and Packages."
- <u>724.986(h)</u>: JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed). JCAR text retains the ending period in the topical subheading, which removes on adoption.
- <u>725 table of contents</u>: The entries in the JCAR text for 725.988 and 725.Appendix A omit revisions the Board made in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- <u>725 source note</u>: JCAR text does not have the entry for R17-12/R17-15/R18-12/R18-31 (which the Board has not yet filed). JCAR text has "R19-2," which the Board corrects to "R19-3" on adoption.

- <u>725.171(a)</u>: JCAR text retains the ending period in the topical subheading (removed by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- 725.171(a)(2)(E)(i): JCAR text has "data entry and processing. In lieu of submitting the paper copy", which the Board changes to "data entry and processing, or in lieu of submitting the paper copy" on adoption. JCAR text has "in e-Manifest," which the Board changes to "in the e-Manifest System" on adoption.
- 725.171(a)(2)(E)(ii): JCAR text has "USEPA system" (twice), which the Board changes to "e-Manifest System" (twice) on adoption. JCAR text has "in e-Manifest," which the Board changes to "in the e-Manifest System" on adoption.
- 725.171(a)(3): JCAR text does not include revisions adopted by the Board in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- 724.171(c) and Board note: JCAR text does not include revisions adopted by the Board in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- <u>724.171(d)</u>: JCAR text does not include revisions adopted by the Board in the R17-12/R17-15/R18-12/R18-31 update (which the Board has not yet filed).
- <u>725.171(f)</u>: JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed). JCAR text retains the ending period in the topical subheading, which removes on adoption.
- <u>725.171(h)</u>: JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed). JCAR text retains the ending period in the topical subheading, which removes on adoption.
- 725.171(i): JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- <u>725.171(j)</u>: JCAR text retains the ending period in the topical subheading (removed by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- <u>725.171(k)</u>: JCAR text does not have the topical subheading in title case (done by the Board in the R17-12/R17-15/R18-12/R18-31 update, which the Board has not yet filed).
- <u>725.171(1)</u>: JCAR text has "corrections may be submitted," which the Board changes to "corrections it may submit" on adoption.
- 725.987(e)(2)(A): JCAR text has an en-dash offset by spaces in place of the em-dash (twice) in "Procedure T—Criteria for and Verification of a Permanent or Temporary Total Enclosure." JCAR text omits a comma after "Procedure T—Criteria for and Verification of a Permanent or Temporary Total Enclosure," which the Board adds on adoption.
- <u>725.987(f)(2)</u>: JCAR text has an en-dash offset by spaces in place of the em-dash (twice) in "Shippers—General Requirements for Shipments and Packages."

725.987(g)(1): JCAR text has a comma before "but are not limited to," which the Board removes on adoption.