



Illinois Pharmacists Association

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17 July 2020

Don A. Brown, Clerk
Illinois Pollution Control Board
State of Illinois Center, Suite 11-500
100 W. Randolph St.
Chicago IL 60601

Re: Consolidated Docket R20-3/R20-11 (electronically submitted don.brown@illinois.gov)

Dear Mr. Brown:

The Illinois Pharmacists Association (IPhA) is a professional association representing pharmacists, pharmacy technicians, and student pharmacists throughout Illinois. Our members provide vital pharmacy services and medications to the citizens of Illinois. IPhA is appreciative to provide comments concerning proposed administrative rules by the Pollution Control Board to 35 IAC 726, especially new sections 600-610.

According to the summary provided by the Pollution Control Board in the June 5th edition of the Flinn Report, these proposed administrative rules were *“These amendments update PCB’s hazardous waste rules to incorporate recent amendments adopted by the U.S. Environmental Protection Agency concerning management of hazardous waste pharmaceuticals and aerosol cans. Those affected by these rulemakings include hospitals, healthcare facilities, and other businesses that dispose of used or expired medications.”*

IPhA is concerned with these amendments just being an incorporation of existing Federal statutes and/or rules. IPhA requests a detailed explanation of how the proposed new sections 600-610 will impact (including day-to-day changes, record keeping, financial change to operations, required equipment, etc) the profession of pharmacy, including but not limited to: pharmacist practice sites (e.g. independent community, chain community, long-term care, health-system, sterile compounding, non-sterile compounding, and specialty pharmacy), wholesalers, small business pharmacy practices, and non-resident pharmacies (especially mail-order).

IPhA is deeply concerned with our initial review of the proposed administrative rules that pharmacies will be forced to shoulder an increase financial burden above and beyond long-term, established internal and external processes of handling and disposal of pharmaceutical waste. In the current economic environment and the long-term improper reimbursement by payers (including the State of Illinois) for medications and patient care services; IPhA cannot recommend any additional regulation that will incur any new financial or regulatory burden upon pharmacies until such time that established current burdens, barriers, and concerns are alleviated.

Please feel free to contact for any additional information or questions. My phone number is 217-522-7300 or via email at greynolds@ipha.org. Thank you in advance for your detailed responses on these proposed rules.

Sincerely,

Garth K. Reynolds, BSPHarm, RPh, MBA
Executive Director