**From:** Susan Monte
**To:** Jessica Schumacher1 (Environment and Sustainability)
**Subject:** FW: Review comment re DRAFT Cook Co SWMP 2018 Update
**Date:** Tuesday, July 17, 2018 10:08:32 AM

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Hi Jessica,

This is a follow-up note to correct my reference to 'used motor oil' as a universal waste in my email below… I want to clarify that used motor oil has its own set of regulations in Illinois: the "Waste Oil Recovery Act" (815 UKCS 440/) so that technically it's not considered a universal waste. (it's not considered a HHW either)… Sort of in its own category.

(More info about universal waste standards in Illinois can be found at Title 35 of the IL Admin Code, Part 733.)


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**PEOPLE. POSSIBILITIES.**

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**From:** Susan Monte
**Sent:** Monday, July 16, 2018 4:00 PM
**To:** 'jessica.schumacher@cookcountyil.gov' <jessica.schumacher@cookcountyil.gov>
**Subject:** Review comment re DRAFT Cook Co SWMP 2018 Update

Hi Jessica,

I have one significant review comment to share regarding the Cook Co Solid Waste Management Plan 2018 Update:

***Regarding Household Hazardous Waste Disposal… pp. 9-10.***

The second paragraph of this section talks about three primary options for proper disposal of their HHW:

- Permanent collection facilities
- Temporary collection events, and
- Commercial retail locations.

My comment is about the statement on p. 10:
"Commercial retail collection locations can be a good resource for Cook County residents looking to property dispose of some types of HHW (e.g. motor oil), however many items like non-latex paints, pesticides and cleaning products are not required to be recycled by the retailers and manufacturers that provide them to the public."

1) My understanding is that commercial retail centers cannot and do not accept HHW. Technically, motor oil is not considered a HHW, although it is accepted at most HHW collection events/facilities. Motor oil and certain other household waste items that are accepted at commercial retail centers are considered a 'universal waste' and not 'household hazardous waste'. The reason commercial retail centers may choose to offer drop-off/collection options for certain types of universal wastes is because they have less restrictive storage & transporting requirements than HHW.
2) A commercial retail center may choose to accept one or more types of household wastes that are classified as 'universal wastes' by the EPA.
3) In 2009 the IL General Assembly passed Public Act 96-0121, amending the IL Environmental protection Act to include key provisions regarding HHW collection. The Act specified the types of household waste classified as universal wastes to be accepted at HHW drop-off points as limited to: pharmaceutical products, personal care products, batteries other than lead-acid batteries, paints, automotive fluids, compact fluorescent light bulbs, mercury thermometers, and mercury thermostats.

My suggestion would be that this Draft include a basic description of what constitutes a HHW. Also that the distinction is clear between collection opportunities available for a 'universal waste' as opposed to collection opportunities available to Cook County residents for 'HHW collection.'
In reality, currently Cook Co residents only have two primary options for proper disposal of HHW (permanent HHW collection facilities and one-day HHW collection events.)

Thanks for the opportunity to review the Draft Cook County SWMP 2018 Update!

Kind regards,

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