



February 5, 2020

*Via Electronic E-Mail: Dan.Brown@illinois.gov*

Don A. Brown, Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph St  
Chicago, IL 60601

**Re: Amendments to Manifesting Requirements: Special Waste Hauling  
35 Il Adm. Code 809 (Rulemaking R19-18)**

Heritage-Crystal Clean, LLC ("HCC") appreciates the opportunity to comment on the proposed changes to the Illinois Environmental Protection Agency's ("Agency") regulations regarding the use of a new special waste form. HCC provides full-service parts cleaning, containerized waste management, used oil collection, vacuum truck services, wastewater treatment, antifreeze recycling for its customers and owns and operates a used oil re-refinery based in Indianapolis, IN. HCC operates as a transporter across the country, hauling hazardous and non-hazardous waste, as well as state-regulated waste including Illinois' Special Waste.

HCC supports a move to replace the current process of providing Illinois Special Waste on a Federal Uniform Hazardous Waste Manifest. A new form could lower the risk of Illinois Special Waste being misidentified as federal hazardous waste and submitted incorrectly to the EPA. HCC currently uses a standard Bill of Lading ("BOL") form which contains the same data and number of copies as the current Federal Uniform Hazardous Waste Manifest and meets the compliance requirements to transport Illinois Special Waste. The new IL regulations should provide the flexibility for a company to use their own form as long as it meets the requirements for shipment from generator to designated facility. This would be a sensible solution and would necessitate only a few minor adjustments and minimal costs to transition.

Thank you for providing an extension to the comment period and allowing HCC to provide feedback on this rule. If you have any questions regarding this response, please do not hesitate to contact myself at (847) 836-5670 or through email at michelle.walper@crystal-clean.com.

Sincerely,

A handwritten signature in black ink that reads 'Anita Decina'.

Anita Decina  
Vice President EHS & DOT

/mw