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DAVID R. LEITCH
ASSISTANT MINORITY LEADER
STATE REPRESENTATIVE - 93RD DISTRICT

draft

Ms. Dorothy M. Gunn, Clerk
Illinois Pollution Control Board
100 W. Randolph Street
Suite 11-500
Chicago, IL 60601

August 5, 1999

R99-18
P.C.#10

Re: Docket R98-29; Docket R98-18 - Used Oil Regulations

Dear Ms. Gunn:

The purpose of my letter is to indicate my strong disagreement with the regulations proposed by the Illinois Environmental Protection Agency (IEPA) amending 35 IL Administrative code 807 and 739.

These proposed regulations would make Illinois regulations more stringent than the federal regulations. The federal regulations were developed to balance environment concerns and market incentives encouraging legitimate used oil recycling.

These proposed regulations place Illinois used oil recyclers at a distinct competitive disadvantage. As I understand the proposal, out-of-state recyclers could procure used oil without a manifest, but Illinois recyclers would have a manifest requirement. Manifesting is costly and generates bureaucratic paperwork.

I believe the federal requirements for used oil regulations are adequate and request that the Illinois Pollution Control Board reject the proposed regulations promulgated by the IEPA.

Please enter my comments into the public record on this subject. Thank you for your consideration of my thoughts on additional regulations for used oil recycling.

Sincerely,

David R. Leitch