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July 26, 2006

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STATE OF ILLINOIS Pollution Control Board

PC#1

MS. DOROTHY GUNN, CLERK Illinois Pollution Control Board James R. Thompson Center 100 West Randolph Suite 11-500 Chicago, Illinois 60601

RE: **R2006-020**

Dear Illinois Pollution Control Board Members:

Our company is writing you in regards to: In the Matter of Amendments to the Board's Special Waste Rules Concerning Used Oil, 35 Ill. Adm. Code 808, 809, RC 06-20.

Thank you for this opportunity to provide public comment in the above-referenced rulemaking. Profit Consultants Ltd. is an Illinois based business providing consulting services to used oil collection companies. Profit Consultants endorses and supports NORA's rule proposal and requests that the Board adopt the language proposed by NORA.

Special Waste manifesting for used oil, including those substances entitled to be regulated as used oil pursuant to federal and state regulations, is burdensome, unnecessary and very costly for Illinois small businesses. Similar businesses in adjoining state do not have this burden.

In closing, our company believes that the current manifesting requirements in Illinois for Used Oil and items regulated as Used Oil are unnecessary and burdensome. We strongly encourage the Board to adopt the language proposed by NORA. We look forward to the Board's adoption of NORA's rule proposal.

Sincerely,

Ronald J. Plankis

Vice President, Consulting Services