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STATE OF ILLINOIS
Pollution Control Board

July 26, 2006

PC# 11

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. I submit this comment on behalf of Safety-Kleen Systems, Inc., a member of NORA. Safety-Kleen services a large number of customers in Illinois by collecting used oils, both automotive crank case industrial derived oils. We direct this oil to our re-refining plant in Indiana for processing into salable lubricating oil, or if the used oil is not of suitable quality for re-refining it will be recycled through energy recovery. Safety-Kleen is the largest re-refiner of used oil in North America and plays a vital role in conserving this resource. Last year alone we collected greater than 180 million gallons of used oils. Therefore, Safety-Kleen 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 and unnecessary.

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,

Lin Longshore
Sr. Vice President of Env.,
Health and Safety

