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JUL 31 2006

STATE OF ILLINOIS
Pollution Control Board

PC#17

ORIGINAL

July 26, 2006

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 Valley Environmental Services, a member of NORA. Valley Environmental Services is owned by Iowa's largest Asphalt Company. This company uses the used oil that we collect to burn in their asphalt plants. VES collects some of this used oil in the state of Illinois. Valley Environmental Services 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,

Ken Reif
Ken Reif