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STATE OF ILLINOIS
Pollution Control Board

Protecting & Growing the liquid recycling industry since 1984.

July 28, 2006

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

PC#28

RE: R2006-020

Dear Illinois Pollution Control Board Members:

I am the Executive Director of NORA, An Association of Responsible Recyclers. We represent 200 used oil and liquid recycling companies throughout the United States. I am writing 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.

As you might expect, we strongly endorse and support NORA's rule proposal and request 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. The current manifesting requirements in Illinois are above and beyond what is required at the Federal level without justification. In addition, the manifesting requirements in Illinois are far outside the norm compared to almost every other state.

NORA 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,

Scott D. Parker
Executive Director