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July 26, 2006

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

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JUL 28 2006

STATE OF ILLINOIS
Pollution Control Board

PC#2

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 Industrial Water Services, Inc, a member of NORA. Industrial Water Services processes industrial wastewater and recovers hydrocarbons. Processed hydrocarbons are sold for energy recovery to end users or fuel blenders. Used Oil recycling is a major part of our business and we have a working facility located in Chicago, Illinois. Industrial Water Services, Inc 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,

Shaunte Staller