



# Energy & Material Recovery, Inc.

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STATE OF ILLINOIS  
Pollution Control Board

*PC#14*

July 26, 2006

ORIGINAL

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 Energy & Material Recovery, Inc., a member of NORA. Energy & Material Recovery, Inc. is a used oil re-refining facility in the state of Oregon and Energy & Material Recovery, 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,

*John A. Oxford*  
John A. Oxford  
VP Compliance

Energy & Material Recovery, Inc.

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