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STATE OF ILLINOIS
Pollution Control Board

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July 28, 2006

VIA UPS GROUND

PC#30

RE: **R2006-020**

Dear Illinois Pollution Control Board (IPCB) 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 am submitting this comment on behalf of Shell Lubricants, an associate member of NORA, An Association of Responsible Recyclers (NORA). Shell Lubricants (which collectively refers to the companies within Royal Dutch Shell engaged in the lubricants business) is the manufacturer, marketer and seller of a number of popular brands of motor oil in the United States, including Pennzoil, Quaker State, Q, Rotella, Formula Shell, and others that together make Shell Lubricants the largest marketer and seller of motor oil products by volume in the United States. Shell Lubricants also owns and either franchises or operates Jiffy Lube stores in Illinois and much of the rest of the United States. Furthermore, for the benefit of our SecureCycle™ program, we evaluate many companies that transport, store, process and otherwise handle used oil, used oil filters and used antifreeze to qualify them to handle the used products that result from the responsible use of our new products by our facilities and those of our customer companies.

Shell Lubricants generally supports regulation of used oil and related materials that is consistent with federal standards promulgated by the U.S. Environmental Protection Agency. To the extent that the proposed amendments to the IPCB's special waste rules would make the state's regulations consistent with USEPA regulations, Shell Lubricants supports these amendments, endorses and supports NORA's rule proposal, and requests that the Board adopt the language proposed by NORA. Shell Lubricants agrees with NORA's position that Special Waste manifesting for used oil, including those substances subject to regulation as used oil pursuant to federal and state regulations, is burdensome and unnecessary, as there are other regulatory requirements in place in the Illinois regulations (and referenced federal regulations) to effectively track these materials.

B. Morton to IPCB

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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 and we look forward to the Board's adoption of NORA's rule proposal.

Sincerely,
Shell Lubricants

A handwritten signature in cursive script that reads "Brett Morton".

Brett Morton
Sr. Environmental Engineer/Product Stewardship

DBM/ajg

c: File