BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	
PETITION OF WORLD RECYCLING, INC.,	)	AS-02- 2
d/b/a PLANET EARTH ANTIFREEZE	)	(Adjusted Standard)
FOR AN ADJUSTED STANDARD FROM	)	
35 ILL. ADM. CODE 720.131(c)	)	

NOTICE OF FILING

PLEASE TAKE NOTICE that on this date, I delivered for filing with the Clerk of the Illinois Pollution Control Board of the State of Illinois, a PETITION FOR AN ADJUSTED STANDARD, a copy of which is attached hereto and herewith served upon you by UPS Next Day Air.

Dated: January 31, 2002

Respectfully submitted,

World Recycling, Inc., d/b/a
Planet Earth Antifreeze, Petitioner

By: _____
Attorney Charles F. Helsten

Firm No. 695
Attorney Charles F. Helsten
HINSHAW & CULBERTSON
PO Box 1389
Rockford, IL 61105-1389
(815)963-8488

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	
PETITION OF WORLD RECYCLING, INC.,	)	AS-02- 2
d/b/a PLANET EARTH ANTIFREEZE	)	(Adjusted Standard)
FOR AN ADJUSTED STANDARD FROM	)	
35 ILL. ADM. CODE 720.131(c)	)	

APPEARANCE

Charles F. Helsten, Hinshaw & Culbertson, 100 Park Avenue, Rockford, Illinois 61101, as attorney, hereby enters his appearance on behalf of the Petitioner, World Recycling, Inc., d/b/a Planet Earth Antifreeze, in the above-captioned case.

Dated: January 31, 2002

World Recycling, Inc., d/b/a
Planet Earth Antifreeze, Petitioner

By: _____
Charles F. Helsten, Its Attorney

Firm No. 695
Attorney Charles F. Helsten
HINSHAW & CULBERTSON
PO Box 1389
Rockford, IL 61105-1389
(815)963-8488

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	
PETITION OF WORLD RECYCLING, INC.,	)	
d/b/a PLANET EARTH ANTIFREEZE	)	AS-02- 2
FOR AN ADJUSTED STANDARD	)	(Adjusted Standard)
FROM 35 ILL. ADM. CODE 720.131(c)	)	

PETITION FOR ADJUSTED STANDARD

World Recycling, Inc., d/b/a Planet Earth Antifreeze (hereinafter referred to as "PEA"), by its attorneys, Charles Helston of Hinshaw & Culberston, hereby petitions the Illinois Pollution Control Board ("Board") for an Adjusted Standard pursuant to 35 Ill. Adm. Code § 104.400 et seq. and Section 28.1 of the Illinois Pollution Control Act, 415 ILCS 5/28.1 ("Act"). PEA requests that the Board grant an adjusted standard from 35 Ill. Adm.Code 720.131(c) and states as follows:

a) **A statement describing the standard from which an adjustment is sought.** PEA requests that the Board review PEA's process of filtering used antifreeze at a customer's site, and determine that the filtered used antifreeze is a commodity-like material. PEA requests that the Board make a solid waste determination, in accordance with 35 IAC 720.131(c), that the filtered used antifreeze is not a solid waste, and being so, is not regulated as such.

b) **A statement that indicates the regulation of general applicability was promulgated to implement, in whole or in part, the requirements of the CWA (33 USC 1251 et seq.), Safe Drinking Water Act (42 USC 300(f) et seq.), Comprehensive Environmental Response, Compensation and Liability Act (42 USC 9601 et seq.), CAA (42 USC 7401 et seq.), or the State programs concerning RCRA, UIC, or NPDES [415 ILCS 5/28.1].** The regulation of general applicability, 35 IAC 721.131(c), was promulgated to implement, in part, the State program concerning the Resource Conservation and Recovery Act.

c) **The level of justification as well as other information or requirements necessary for an adjusted standard as specified by the regulation of general applicability or a statement that the regulation of general applicability does not specify a level of justification or other requirements.** There is no level of justification specified by 35 IAC

721.131(c); however, the regulation of general applicability does include specific criteria, which must be followed by the Board in making the solid waste determination. The criteria, as they apply to PEA's process, are described as follows:

1. *The degree of processing the material has undergone and the degree of further processing that is required.*

   PEA filters used antifreeze upon their customers' request. Once the customer has collected a certain amount of used antifreeze, PEA is notified. PEA arrives onsite with their "filtration-system" equipped truck. The system consists of a pump and a two-stage bag filtration system. The used antifreeze is first filtered through a 20-micron filter and then a 5-micron filter. Following filtration, the antifreeze is pumped into a polyethylene tank where dyes and inhibitors are added, thereby creating a useable product which is sold back to the customer. This system, hereafter will be referred to as "onsite filtration".

   Before filtering the drum/container of used antifreeze, the customer is questioned as to whether or not the used antifreeze is free from contaminants and if it has been stored in a safe and secure manner. PEA provides each customer with a clean drum to store the used antifreeze. Each drum is labeled "USED ANTIFREEZE ONLY". Exhibit 1 includes a copy of the labels PEA provides to its customers. In addition, customers sign a certification statement indicating that used antifreeze is the only material presented to PEA (a copy of the certification statement is included as Exhibit 2. Before accepting the used antifreeze, the antifreeze is visually checked for petroleum products such as oil. The physical inspection consists of dipping a clear plastic tube (suction hose) into the used antifreeze and examining it for evidence of contamination such as an oil sheen or a detectable petroleum odor. A presence of either a sheen or odor would result in rejection of the used antifreeze. The customer is then responsible for disposal of the material.

   The used antifreeze is run through PEA's truck mounted bag filtration system to remove particles of rust, scale, pieces of gasket and other solid particles. Once the material is filtered, PEA then transports the filtered used antifreeze to its central processing facility for further conditioning where chemical inhibitors and dyes are added to the filtered antifreeze.

These "additives" will improve the quality of the end product. After the inhibitors and dyes are added, the material is sold back to the customer in quantities equal to the amount filtered. This material is equivalent to virgin antifreeze from a chemical, physical, and financial aspect. The only distinction between the virgin material and the filtered material is the color, water content, additive levels, and price. The filtered used antifreeze can be sold at a lesser price than the virgin material. The filtered used antifreeze, following the addition of dues and inhibitors, contains residual inhibitors and may be used as product antifreeze without further processing. The chemical analysis on the filters and filtered used antifreeze, which is detailed in the ensuing sections, will provide proof of such a claim. The expert testimony of Mr. Edward Eaton, a chemical engineer with experience in the antifreeze recycling industry, in the April 1, 1998 hearing in the matter of Petition of Recycle Technologies, Inc., indicated that "filtered used antifreeze is not merely commodity-like, but a commodity". Mr. Eaton stated that there is an extensive market for filtered used antifreeze. The advantage to the filtered product is that it does not need to be mixed with water, as does virgin antifreeze. A copy of the hearing transcript is included as Exhibit 3.

PEA's onsite filtration process is similar to the Wynn Du-All ® commercial on-site antifreeze recycling system. According to expert testimony in the April 1, 1998 hearing in the matter of Petition of Recycle Technologies, Inc., "the on-site filter system that Recycle Technologies was using (a two-stage filtration unit), is essentially the same as the WYNN Du-All ®" commercial on-site antifreeze recycling machine which is used and approved by General Motors and the Chrysler Corporation". In addition, this type of filtration system also satisfied standards adopted by the American Society for Testing and Materials (ASTM) when inhibitors and dyes are added. Testimony also indicated that the WYNN recycle coolant technology met the ASTM standard for new coolant (ASTM 3306 - Standard Specification for Ethylene Glycol Base Engine Coolant for Automobile and Light Duty Service) and the then proposed, standard for Recycled Prediluted Aqueous Glycol Base Engine Coolant (50% Volume % Minimum) for Automobile and Light-Duty Service (this standard was promulgated in 1999). The Wynn system is presented in the General Motors Service Bulletin 73-62-14 entitled Approved Engine Coolant Recycling Processes, which is included as Exhibit 4.

One difference between the WYNN Du-All ®" system and that of PEA's is that PEA's filters are 20 inches long as opposed to Wynn's 10 inch filters. A longer filter would increase the surface area, thus enabling a greater amount of material to be filtered.

PEA's onsite-filtered antifreeze was analyzed following the filtration and augmentation of additives and dyes. Two types of analysis were completed. The first was conducted to determine the chemical characteristics of the material. This analysis was compared to industry and ASTM coolant specification standards. The analysis report indicates that the filtered used antifreeze is "suitable for continued use". Please refer to Exhibit 5 for a copy of the analytical report. The analysis were compared to the following three standards/specifications:

1) ASTM D6471 (Standard Specifications for Recycled Prediluted Aqueous Glycol Base Engine Coolant (50% Volume % Minimum) for Automobile and Light-Duty Service), this standard was promulgated in November 1999;

2) GM Standard 1825M, and;

3) ASTM D3306 Standard (Standard Specification for Ethylene Glycol Base Engine Coolant for Automobile and Light Duty Service).

Exhibit 6 contains a list of each of the above standards/specifications. The analytical results indicate that the on-site processed used antifreeze meets all three sets of the chemical and physical requirements.

The second set of analytical included a full hazardous waste determination of the onsite-filtered antifreeze. The analysis revealed the filtered used antifreeze to be below all hazardous waste levels. In addition, PEA had a full hazardous waste analysis conducted on both filters. The analysis concluded that both filters were also non-hazardous. Copies of the analytical reports are included in Exhibits 7 and 8, respectively.

In order to be competitive, PEA started transporting the filtered antifreeze back to a centralized location for further conditioning,

specifically to enhance the cosmetic appearance of the end or final product. Additives are now mixed at the central facility rather than at the customers/generators site, and the processed antifreeze is then sold back to the original customers. This system, hereafter will be referred to as "offsite-processing".

All the competing antifreeze recyclers are now conducting the same procedure, although some are not filtering onsite. Refer to Exhibit 9 for a list of competing companies and their methods of recycling. The split absorption/filtration process, which PEA conducts at its centralized filtration location, is designed to further remove dyes and coloring from the filtered antifreeze in order to give the final product a more uniform color. The end result produces a nearly pure ethylene glycol and water mixture. This type of process produces the same end product, as does the reverse osmosis process. A representative of Tri-Tech Worldwide Corporation, one of the first and leading manufactures of antifreeze recycling equipment, as well as being PEA's supplier, has stated the following: "the split absorption/filtration process which PEA uses, produces the same results as does the used antifreeze which is processed through a reverse osmosis system. In fact, Tri-Tech representative stated that "there are customers that have used both systems and prefer the split absorption/filtration process because it produces a better-finished product". One reason why PEA chose not to use the RO system is that hazardous chemicals have to be used in the "cleaning" of the system. Tri-Tech Worldwide Corporation conducted many tests of the split absorption/filtration process showing that the end result produces a quality product. A copy of a "before and after" analysis of antifreeze run through the split absorption/filtration process is included as Exhibit 10. The "after" analysis (Lab No. 6382) shows that the metals and physical test results are within the acceptable levels of usable antifreeze.

2. *Value of the material after it has been reclaimed.*

The quality of the onsite filtered material is chemically and physically the same as virgin product. Both the filtered used antifreeze and the virgin antifreeze consists primarily of ethylene glycol, which is the base substance of antifreeze, and residual dyes and inhibitors. The filtered used antifreeze contains an approximate 50-50 ratio of antifreeze to water. This is especially appealing to customers, because unlike virgin material, there is no need to pre-mix the antifreeze with water. Due to the

similarities between the onsite filtered used antifreeze and virgin antifreeze, the value will be similar. PEA has over 1000 customers and their business has grown in six years. Exhibit 11 contains a list of amounts of antifreeze reclaimed and the sales figures for the recycled antifreeze sold. Affidavits from customers stating that they have purchased the onsite-filtered material and find that it is of exceptional quality are included as Exhibit 12. In addition, affidavits from customers are also included indicating that they have and will purchase the filtered antifreeze from PEA which has been further processed at PEA's centralized facility.

Currently the market price for the onsite filtered antifreeze in the Chicago area is $1.65 to $2.00 per gallon, depending on the amount reclaimed/provided. The current price for the onsite-filtered antifreeze, which is further processed at PEA's centralized facility, is the same. The current retail and wholesale price for new 100% virgin antifreeze in the Chicago area is $4.00 to $6.00 per gallon. The current retail price for 100% virgin antifreeze premixed with water is approximately $4.00 per gallon.

3. *The degree to which the reclaimed material is like an analogous raw material.*

Virgin antifreeze is made up of ethylene glycol with dye and inhibitor additives. The filtered used antifreeze, with the augmentation of the additives is equivalent to virgin antifreeze from a chemical, physical and economic aspect. The only distinction between the virgin material and the filtered material is the color, water content and additive levels. The advantage to the filtered product is that it does not need to be mixed with water, as does virgin antifreeze. A copy of the chemical specifications of 100% virgin antifreeze is included as Exhibit 13. The chemical analytical specification of the onsite-filtered antifreeze (refer to Exhibit 5) compared to the chemical specifications of virgin antifreeze, shows that the on-site filtered used antifreeze is analogous to the chemical specification of new antifreeze. The onsite filtered used antifreeze was further compared to the ASTM standard D3306 (Standard Specification for Ethylene Glycol Base Engine Coolant for Automobile and Light Duty Service) as well as the GM standard 1825M (refer to Section 1 above). Both comparisons show that the filtered used antifreeze is analogous to the chemical specifications of new antifreeze. This is further proved by the analytical report from

the laboratory indicating that the filtered used antifreeze is "suitable for continued use" (please refer to Exhibit 5).

4. *The extent to which an end market for reclaimed material is guaranteed.*

PEA has been in operation since 1996 and has an established clientele list of over 1000 companies. Onsite filtered used antifreeze that is further processed at the central processing facility is sold back to customers after the used antifreeze is picked up. General Motors and Ford approve the use of recycled antifreeze (refer to Exhibit 14). In addition to automobile dealers and automobile service stations, the state of Illinois requested a bid from PEA for recycled used antifreeze and providing recycling antifreeze for the state garages. A copy of this request has been included as Exhibit 15. This shows that the State of Illinois does approve the recycling of used antifreeze and the use of recycled antifreeze. PEA was also requested to bid on the City of Chicago antifreeze-recycling program. PEA was just granted a contract with PACE, a large transportation company with nine locations throughout the Chicago land area.

Because antifreeze is sometimes lost from leaks and spills in the coolant system and its maintenance, the typical customer generates enough used antifreeze to replace approximately 50% of their new antifreeze purchases. In addition to providing antifreeze back to customers who have their used antifreeze filtered by PEA, PEA provides to them additional used antifreeze. PEA also provides filtered used antifreeze to customers who do not have their used antifreeze recycled.

5. *The extent to which the reclaimed material is handled to minimize loss.*

PEA provides each customer with a clean drum to store the used antifreeze. By providing clean leak-free containers, PEA starts the spill/leak prevention program. Only PEA handles the filtered used antifreeze during the onsite filtering process. Before pumping the used antifreeze into the two-stage filtration system situated in Pea's van trucks, PEA visually checks the storage container, associated tubing, as well as the receiving poly tank located on the PEA truck for structural integrity. The used antifreeze is then pumped from the generators' container through the two-stage filtration system and into the polyethylene tank.

The PEA driver/operator is present at all times during the pumping operation. Affidavits from customers stating that PEA operates in a safe and professional manner have been included in Exhibit 12. Each truck has been supplied with spill response material in the event of a leak. After collection, the truck returns to PEA's centralized processing facility.

At the central-processing facility, the filtered used antifreeze is pumped into a polyethylene holding tank located inside the building. From the holding tank the filtered antifreeze is pumped into a flocculation tank where additional clarification occurs. From there, the antifreeze is filtered into a series of carbon filtration canisters and then into a polyethylene-mixing tank. The entire floor of the building is concrete. One floor drain leads to the sanitary sewer. A custom-designed plug is inserted in the drain upon conducting operations. All the storage tanks are surrounded concrete containment dikes. All personnel are trained extensively by the owner, Mr. Don Bloyer on the proper handling and spill prevention and countermeasure procedures for both the onsite-filtration process, and the off-site processing operation. Mr. Bloyer has approximately 10 years of experience in the antifreeze recycling industry and approximately 35 years in the automotive industry.

6. Other relevant factors.

In September 1997, Recycle Technologies, Inc., filed a petition for an Adjusted Standard for 35 Ill. Adm. Code 720.131(c). This petition, essentially identical to that of PEA's, was granted on September 3, 1998. In addition, a second Adjusted Standard was issued to Progressive Environmental Services, Inc., on January 10, 2002. PEA's operations are essentially the same as both Recycle Technologies, Inc. and Progressive Environmental Services, Inc.

d) **A description of the nature of the petitioner's activity that is the subject of the proposed adjusted standard.**

PEA travels to customers/generators for the purposes of pumping uncontaminated used antifreeze generated by its customer into a two-stage filtration system that is located on PEA's trucks. The two-stage filtration system consists of a 20-micron filter and a 5-micron filter (this filtration system has been shown to be equivalent in nature to commercial on-site antifreeze recycling machines that have been approved by General Motors and Chrysler Corporation for some of its vehicles. It has also been approved by

ASTM Standards. Once the used antifreeze is put through the filters it is placed into a polyethylene tank. In the past, PEA initially added dyes and additives to the onsite filtered antifreeze and then returned the product to the customer while onsite at the customer's location. However, due to the growing market and the competition advancing to "further processing" PEA began transporting the onsite filtered antifreeze to its central processing facility for "further processing and enhancement. PEA did not increase the price of used antifreeze that was to be further processed at its centralized processing facility.

Current operations involve onsite filtering of the used antifreeze, then transporting the antifreeze to PEA's central processing facility where it is pumped into a 1500-gallon polyethylene holding tank. The material is then pumped into a flocculation system, which further removes the impurities. Following the flocculation system, the antifreeze is routed to a 1-micron filter cartridge. The antifreeze is then routed through three (3) charcoal filtration canisters, which further removes dyes, and then through another 1-micron filter. Following the last stage of filtration, a nearly pure ethylene glycol and water mixture product is produced. The clear product allows for the addition of different colors of dyes to be added. The final process of the antifreeze is the incorporation of the additives and dyes in a second 1500-gallon polyethylene-holding tank.

All the tanks are stored within a concrete containment system. There is only one floor drain, which is located in the building. The floor drain is sealed during any type of operations.

There is no pollution control equipment in place. Nor, is there a need for any type of control equipment. There are no air emissions, water discharges or any other type of releases to the environment. Residuals that are generated from the process include the filters, and the used charcoal.

A hazardous waste analysis (TCLP) was conducted on the filters and the filtered used antifreeze generated from the initial onsite filtration process. The analytical results conclude that both the filters and the filtered used antifreeze are non-hazardous. Therefore, based on generator knowledge, the filters and charcoal generated at the central processing facility are certified to be non-hazardous. PEA certifies, in accordance with Section 3.45 of the Illinois Control Act, 415 ILCS 5/3.45, that the residual solids are not Illinois Special Wastes, as defined in the Illinois Environmental Protection Act. The residual solids are disposed of in a solid waste landfill.

The central processing facility is located at 5024 Willow Creek Road, Machesney Park, Illinois, 61111. The facility has been in operation since April 1996. There are presently six employees. PEA is planning to move its operation to 6307 Material Avenue in Loves Park, Illinois within the next few months. Operations will be identical to the present operations. A letter from the municipality approving of the operation is included as Exhibit 16.

e) **A description of the efforts that would be necessary if the petitioner was to comply with the regulations of general applicability.**

If PEA were denied an adjusted standard, the following standards would have to be complied with:

1. PEA would have to obtain siting approval for a "pollution control facility" from the municipality. According to the Village of Machesney Park Planning and Zoning Department, there has never been a "pollution control facility" operating in Machesney Park. The Village is unaware of the local siting approval process. Therefore, the request for siting approval would most likely be an "education" process for the village. This would in all probability, increase the process time and prove to be considerably expensive for PEA. According to the "Pollution Control Facility "PCF" Siting in Illinois: Sixth Report" Review and Approval Process flow chart, included as Exhibit 17, a decision would not be made until 6 months from the date the municipality receives the request. Preparation and cost is involved with the request. Because there have been no pollution control facilities in Machesney Park, there have been no fees established. According to the Winnebago County Assistant State's Attorney, the average filing fee for Winnebago County is $ 10,000. This statement is further documented by Exhibit 18 (appendix A of the "Pollution Control Facility Siting In Illinois: Sixth Report").

2. Following siting approval, an application for a permit to operate will need to be completed and submitted to the Illinois Environmental Protection Agency for review and issuance. Time and additional costs for completing the application are involved. PEA would have to manifest all shipments of filtered used antifreeze from each individual customer. In addition, copious amounts of record keeping would be required, as would the development of plans. Special waste transportation permits would also need to be obtained.

f) **A narrative description of the proposed adjusted standard as well as proposed language for a Board order that would impose the standard.**

The regulation of general applicability 35 IAC 721.131 includes specific language allowing the Board to render a solid waste determination.

g) **The quantitative and qualitative description of the impact of the petitioner's activity on the environment if the petitioner were to comply with the regulation of general applicability as compared to the quantitative and qualitative impact on the environment of the petitioner were to comply only with the proposed adjusted standard.**

There are no known differences, quantitatively or qualitatively to the impact on the environment from complying with the regulation of general applicability as opposed to the proposed adjusted standard. The regulation of general applicability would require PEA to obtain a permit and generate additional paperwork in the form of manifests and reports, which would not result in any kind of improvement to the environment, since the environment is not being affected from this operation. There would also not be a negative impact to the environment if PEA were to comply with the proposed adjusted standard. Because there are no emissions of any type from the central processing facility operations (split absorption/filtration process) permitting the process would not alter the process in any way. And, since PEA is presently operation in a safe manner, complying with the regulation of general applicability would not provide any advantages to the environment, in fact it could prove disadvantageous because of the amount of paperwork (printing emissions) required for compliance.

The following two types of waste streams are generated from the split absorption/filtration process: filters and activated charcoal. Based upon generator knowledge, the waste is non-hazardous (refer to Exhibit 8).

The potential risk of harm to human life or the environment associated with an accidental release at the central processing facility is minimal for the following reasons: 1) Ethylene Glycol has limited hazards, 2) the antifreeze stored is a 50/50 mixture of virgin antifreeze and water and 3) the storage tanks are contained in a cement containment system. The maximum amount of storage at any one-time onsite is 3,000 gallons.

h) **A statement that explains how the petioner seeks to justify, pursuant to the applicable level of justification, the proposed adjusted standard.**

Please refer to Section C.

i) **A statement with supporting reasons that the Board may grant the proposed adjusted standard consistent with federal law.**

"The regulation of general applicability [35 IAC 721.131(c)] includes a provision for the Board to make a ruling in such cases in determining whether a material is a solid waste. The federal regulations mirror the state regulations in language and content. There are no further procedural requirements imposed by federal law that are applicable to the Board's decision on the petition. The citation for the federal regulation of general applicability is 40 CFR 260.31 (c)".

j) **A statement requesting of waiving a hearing on the petition (pursuant to Section 104.422(a)(4) of this Part a hearing will be held on all petitions for adjusted standards filed pursuant to 35 Ill. Adm. Code 212.123 (CAA)).**

PEA requests that a hearing on this petition be waived.

k) **The petition must cite to supporting documents or legal authorities whenever they are used as a basis for the petitioner's proof.**

Please refer to list of exhibits.

l) **Any additional information which may be required in the regulation of general applicability.**

PEA uses the same onsite filtration equipment as does Recycle Technologies, Inc., and Progressive Environmental Services, Inc., both of whom were granted an adjusted standard from 35 Ill. Adm. Code 720.131, Subparagraph c. The two stage filtration systems are essentially the same as commercial onsite recycling machines, which are approved for use by automotive manufacturers. The used antifreeze, which is processed through these machines, meets some automotive manufacturer standards as well as the ASTM standards for new antifreeze and prediluted recycled antifreeze. Following the onsite-filtration, additives and dyes are added, thereby creating a more appealing product. In order to create a more appealing product (cosmetically), PEA is transporting the filtered used antifreeze (prior to the addition of dyes and inhibitors) to its centralized processing facility where the split absorption/filter process further enhances the appearance of the product. While PEA does not use the Reverse Osmosis system as does Recycle Technologies, Inc., and Progressive Environmental Services, Inc., it has been shown that the split absorption/filtration process produces the same outcome: a virtually clear glycol ethylene and water mixture, thereby allowing the

addition of dyes and inhibitors to produce a clear product that is indistinguishable from 100% virgin antifreeze.

WHEREFORE, World Recycling, Inc., d/b/a Planet Earth Antifreeze requests the Board grant an adjusted standard from 35 Ill. Adm. Code 720.131(c).

Respectfully Submitted,

World Recycling, Inc., d/b/a Planet Earth Antifreeze, Petitioner

By: _____
Attorney Charles F. Helsten

Attorney Charles F. Helston
Hinshaw & Culbertson
100 Park Avenue
Rockford, Illinois 61101
Phone: (815) 963-8488

This filing is submitted on recycled paper.

HC07_DS1 284469v1

Exhibit 1

PEA Labels Provided to Customers

Planet Earth Antifreeze

This Drum is for USED ANTIFREEZE ONLY !

NO Gasoline, Motor Oil, Solvents, Brake/Trans/Steering Fluids!

Ready to Use Recycled Antifreeze
For Sales, Service or Information
1-800-667-5997

P E A

PLANET EARTH ANTIFREEZE

READY TO USE ANTIFREEZE
DO NOT DILUTE

1-800-667-5997

Exhibit 2

Customer Certification Statement

PLANET EARTH ANTIFREEZE
MACHESNEY PARK IL
800-667-5997

CUSTOMER CERTIFICATION STATMENT

COMPANY CONFIDENTIAL

ADDRESS CONFIDENTIAL St.

THE ABOVE-INDICATED CUSTOMER CERTIFIECS THE FOLLOWING:

1. TO STORE USED ANTI-FREEZE IN A CLEAN & SAFE MANNER.

2. TO TAKE REASONABLE CARE IN KEEPING THE USED ANTIFREEZE CONTAINERS FREE FROM CONTAMINATION (I.E. OIL & SOLVENTS).

3. TO NOTIFY PLANET EARTH ANTIFREEZE WHEN AGREED QUANITY OF USED ANTIFREEZE HAS BEEN ACCUMULATED AND IS READY FOR PROCESSING.

CUSTOMER NAME: [signature]

CUSTOMER SIGNATURE: [signature]

DATE 01-25-2002

PLANET EARTH ANTIFREEZE
MACHESNEY PARK IL
800-667-5997

CUSTOMER CERTIFICATION STATMENT

COMPANY CONFIDENTIAL Dodge

ADDRESS 57[redacted] State Street

Rockford IL 61108

THE ABOVE-INDICATED CUSTOMER CERTIFIECS THE FOLLOWING:

1. TO STORE USED ANTI-FREEZE IN A CLEAN & SAFE MANNER.

2. TO TAKE REASONABLE CARE IN KEEPING THE USED ANTIFREEZE CONTAINERS FREE FROM CONTAMINATION (I.E. OIL & SOLVENTS).

3. TO NOTIFY PLANET EARTH ANTIFREEZE WHEN AGREED QUANITY OF USED ANTIFREEZE HAS BEEN ACCUMULATED AND IS READY FOR PROCESSING.

CUSTOMER NAME: Bill Reusch

CUSTOMER SIGNATURE: Bill Reusch

DATE 1-25-02

PLANET EARTH ANTIFREEZE
MACHESNEY PARK IL
800-667-5997

CUSTOMER CERTIFICATION STATMENT

COMPANY Lube Pros

ADDRESS 1700 E. Riverside Blvd

THE ABOVE-INDICATED CUSTOMER CERTIFIECS THE FOLLOWING:

1. TO STORE USED ANTI-FREEZE IN A CLEAN & SAFE MANNER.

2. TO TAKE REASONABLE CARE IN KEEPING THE USED ANTIFREEZE CONTAINERS FREE FROM CONTAMINATION (I.E. OIL & SOLVENTS).

3. TO NOTIFY PLANET EARTH ANTIFREEZE WHEN AGREED QUANITY OF USED ANTIFREEZE HAS BEEN ACCUMULATED AND IS READY FOR PROCESSING.

CUSTOMER NAME: Lube Pros

CUSTOMER SIGNATURE:

DATE 1-25-02

PLANET EARTH ANTIFREEZE
MACHESNEY PARK IL
800-667-5997

CUSTOMER CERTIFICATION STATMENT

COMPANY CONFIDENTIAL Automotive

ADDRESS CONFIDENTIAL st Hwy

Mount Prospect

THE ABOVE-INDICATED CUSTOMER CERTIFIECS THE FOLLOWING:

1. TO STORE USED ANTI-FREEZE IN A CLEAN & SAFE MANNER.

2. TO TAKE REASONABLE CARE IN KEEPING THE USED ANTIFREEZE CONTAINERS FREE FROM CONTAMINATION (I.E. OIL & SOLVENTS).

3. TO NOTIFY PLANET EARTH ANTIFREEZE WHEN AGREED QUANITY OF USED ANTIFREEZE HAS BEEN ACCUMULATED AND IS READY FOR PROCESSING.

CUSTOMER NAME: Joe Pintz

CUSTOMER SIGNATURE: [signature]

DATE 1/25/01

PLANET EARTH ANTIFREEZE
MACHESNEY PARK IL
800-667-5997

CUSTOMER CERTIFICATION STATMENT

COMPANY CONFIDENTIAL Auto Repair

ADDRESS 445 CONFIDENTIAL Arlington Hts Rd.

Arlington Hts, IL 60005

THE ABOVE-INDICATED CUSTOMER CERTIFIECS THE FOLLOWING:

1. TO STORE USED ANTI-FREEZE IN A CLEAN & SAFE MANNER.

2. TO TAKE REASONABLE CARE IN KEEPING THE USED ANTIFREEZE CONTAINERS FREE FROM CONTAMINATION (I.E. OIL & SOLVENTS).

3. TO NOTIFY PLANET EARTH ANTIFREEZE WHEN AGREED QUANITY OF USED ANTIFREEZE HAS BEEN ACCUMULATED AND IS READY FOR PROCESSING.

CUSTOMER NAME: Christian Seils

CUSTOMER SIGNATURE: [signature]

DATE 1-25-02

PLANET EARTH ANTIFREEZE
MACHESNEY PARK IL
800-667-5997

CUSTOMER CERTIFICATION STATMENT

COMPANY CONFIDENTIAL

ADDRESS 10 CONFIDENTIAL Rd #C

Mt Prospect IL 60056

THE ABOVE-INDICATED CUSTOMER CERTIFIECS THE FOLLOWING:

1. TO STORE USED ANTI-FREEZE IN A CLEAN & SAFE MANNER.

2. TO TAKE REASONABLE CARE IN KEEPING THE USED ANTIFREEZE CONTAINERS FREE FROM CONTAMINATION (I.E. OIL & SOLVENTS).

3. TO NOTIFY PLANET EARTH ANTIFREEZE WHEN AGREED QUANITY OF USED ANTIFREEZE HAS BEEN ACCUMULATED AND IS READY FOR PROCESSING.

CUSTOMER NAME: Ronald A Petrucci II

CUSTOMER SIGNATURE: Ronald A Petrucci II

DATE 1-25-02

PLANET EARTH ANTIFREEZE
MACHESNEY PARK IL
800-667-5997

CUSTOMER CERTIFICATION STATMENT

COMPANY [illegible]

ADDRESS [illegible] MAIN

EAST DUNDEE IL 60118

THE ABOVE-INDICATED CUSTOMER CERTIFIECS THE FOLLOWING:

1. TO STORE USED ANTI-FREEZE IN A CLEAN & SAFE MANNER.

2. TO TAKE REASONABLE CARE IN KEEPING THE USED ANTIFREEZE CONTAINERS FREE FROM CONTAMINATION (I.E. OIL & SOLVENTS).

3. TO NOTIFY PLANET EARTH ANTIFREEZE WHEN AGREED QUANITY OF USED ANTIFREEZE HAS BEEN ACCUMULATED AND IS READY FOR PROCESSING.

CUSTOMER NAME: Jim BAYERT

CUSTOMER SIGNATURE: Jim Bayert

DATE 1-25-02

Exhibit 3

April 1, 1998 Hearing Transcript from "Petition of Recycle Technologies, Inc."