

OCT 05 2009



1927 Pinewoods Way
Spring, TX 77386
281-362-9000 Fax 281-362-9944
E-mail: ray@xeray.com

STATE OF ILLINOIS
Pollution Control Board

September 29, 2009

pc# 95 _____

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:
PROPOSED AMENDMENTS TO THE BOARD'S SPECIAL
WASTE REGULATIONS CONCERNING USED OIL

35 ILL. ADMIN. CODE 739,808,809
R06-20 2009 XRS Monthly Deals (RULEMAKING-LAND)

COMMENTS OF XERAY Systems, Inc.

XERAY Systems commends the board for its carefully considered proposal to improve used oil regulations in the State of Illinois. Eliminating the requirement for unnecessary and duplicative manifests will reduce paperwork and costs. This is especially important for small businesses. Under the Board's proposed amendments the tracking of used oil shipments will continue but, will be much more efficient and cost-effective.

The proposed amendments will help level the playing field by reducing the burden on businesses in Illinois. These burdens are not imposed on businesses in other states.

XERAY Systems, Inc. urges the Board to adopt it's proposed amendments without any changes.

XERAY Systems, Inc.
Ray Mt. Joy
President

Ray Mt. Joy
9/29/09

"Recycling isn't Recycling,
unless it's **TOTAL RECYCLING**"



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OCT 05 2009
STATE OF ILLINOIS
Pollution Control Board

PC# 96

September 29, 2009

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PERTAINING TO THE MATTER OF REQUIREING MANIFESTING OF USED OIL &
PROPOSED AMENDMENTS TO THE BOARD'S SPECIAL WASTE REGULATIONS

35 ILL. ADM. CODE 739, 808, 809

R06-20

(Rulemaking - Land)

My name is Rick Adams, representing Total Recycling Technologies, a member of NORA. I want to commend the Board for its carefully considered proposal to improve used oil regulations in the State of Illinois. Eliminating the requirement for unnecessary and duplicative manifests will reduce paperwork and costs. This is especially important for most of the business's in the used oil transportation market in Illinois. Under the Board's proposed amendments the tracking of used oil shipments will continue, but will be much more efficient and cost-effective.

The proposed amendments will help level the playing field by reducing the burden on businesses in Illinois. These burdens are not imposed on businesses in the state of Texas where I operate or in other states where used oil is picked up and transported.

Total Recycling Technologies urges the Board to adopt its proposed amendments without any changes.

Sincerely,

Rick Adams

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North Branch Environmental, a division of Van Hoesen Industries, Inc.

OCT 05 2009

7N458 Garden Avenue

Roselle, ILLINOIS

Phone: 630-529-0240

Fax: 630-529-0887
STATE OF ILLINOIS
Control Board

September 28, 2009

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PC# 97

IN THE MATTER OF:)
PROPOSED AMENDMENTS TO THE)
BOARD'S SPECIAL WASTE REGULATIONS) R06-20
CONCERNING USED OIL) (Rulemaking -- Land)
35ILL. ADM. CODE 739,808,809)

To whom it may concern:

Comments of: John W. Van Hoesen

I would like to thank the Board for their commitment to the citizens of Illinois and to small businesses they represent that will benefit from the proposal to improve used oil regulations in the State of Illinois. By eliminating the unnecessary manifesting of used oil it will reduce the paperwork and cost of maintaining these records. The Board's proposed amendments will not change the practice of tracking used oil shipments but will be more efficient and cost-effective.

The proposed amendments will certainly help level the playing field by reducing the burden on business in Illinois. I believe these burdens are not imposed on business in other states.

I believe it to be in the best interest for business that I urge the Board to adopt its proposed amendments without changes.


John W. Van Hoesen



Pct# 98

298 Beinoris Drive, Wood Dale, Illinois 60191
(630) 350-8909

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

PROPOSED AMENDMENTS TO THE BOARD'S SPECIAL WASTE REGULATIONS
CONCERNING USED OIL

STATE OF ILLINOIS
Pollution Control Board

35 ILL. ADM. CODE 739, 808, 809

R06-20

(Rulemaking-Land)

COMMENTS OF GARY L. GUNDERSON, RECYCLE TECHNOLOGIES, INC.

We thank the Illinois Pollution Control Board for proposing to improve the paperwork requirements in Illinois. As a small company this helps us compete with other businesses in other states while still tracking used oil shipments. We believe the board should adopt its proposed amendments without any changes.

9-29-09

Gary L. Gunderson
President
Recycle Technologies, Inc.



Pct# 99

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STATE OF ILLINOIS
Pollution Control Board

BEFORE THE ILLINIOS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
PROPOSED AMENDMENTS TO THE)	
BOARDS SPECIAL WASTE REGULATIONS)	R06-20
CONCERNING USED OIL)	(Rulemaking-Land)
35 ILL.ADM.CODE 739,808,809)	

Curran Contracting commends the Board for its carefully considered proposal to improve used oil regulations in the State of Illinois. Eliminating the requirement for unnecessary and duplicative manifest will reduce paperwork and cost. This is especially important for small businesses .Under the Board's proposed amendments the tracking of used oil shipments will continue-but will be much more efficient and cost-effective.

The proposed amendments will help level the playing field by reducing the burden on businesses in Illinois. These burdens are not imposed on businesses in other states.

Curran Contracting urges the Board to adopt its proposed amendments without any changes.

9-28-09

John Simon
Curran Contracting
286 Memorial Court
Crystal Lake Il.60014



COMO

LUBE & SUPPLIES INC



1108 Port Terminal Dr • Duluth MN 55802
(218) 722-2920 • (800) 962-5417 • FAX (218) 726-0779

PCH 100

Vickie Custer
NORA Illinois Working Group Chairperson
Fax: 708-460-3328

To: Illinois Pollution Control Board

Subject: Proposed amendments to 35 ILL. Admin. Code 739, 808, 809 (regulations Concerning Used Oil)

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STATE OF ILLINOIS
Pollution Control Board

In regard to the above referenced subject, Como Lube & Supplies Inc. would like to encourage the Illinois Pollution Control Board to continue demonstrating their obvious commitment to the goal of reducing unnecessary or burdensome regulations as they relate to used oil management in the State of Illinois.

If implemented, the Board's proposed amendments will greatly reduce administrative burdens for private as well as public entities while at the same time continue to protect the environment through responsible used oil management.

I would like to take this opportunity to commend the Board for its insightful approach for reducing unnecessary administrative burdens; burdens that put Illinois small businesses at a competitive disadvantage with states such as Minnesota who do not impose such requirements.

Implementation of your current proposal will allow Illinois businesses to focus their efforts and resources in a manner that will best protect their employees as well as our precious environment for generations to come. Please adopt your current amendments without change.

Sincerely,

Ronald D. Swanson
Ronald D. Swanson

CFO

Como Lube and Supplies, Inc



ISO 14001 CERTIFIED

September 29, 2009

PC#101

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

**IN THE MATTER OF:
PROPOSED AMENDMENTS TO THE BOARD'S SPECIAL WASTE
REGULATIONS CONCERNING USED OIL**

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STATE OF ILLINOIS
Pollution Control Board**

35 ILL. ADM. CODE 739, 808, 809

**R06-20
(Rulemaking - Land)**

Dear Board Members:

ESI Environmental commends the Board for its carefully considered proposal to improve used oil regulations in the State of Illinois. Eliminating the requirement for unnecessary and duplicative manifests will reduce paperwork and costs. This is especially important for small businesses like our company. Under the Board's proposed amendments the tracking of used oil shipments will continue - but will be much more efficient and cost-effective.

The proposed amendments will help level the playing field by reducing the burden on businesses in Illinois. These burdens are not imposed on businesses in other states.

We urge the Board to adopt its proposed amendments without any changes. Thank you, in advance for your consideration.

Sincerely,

Thomas J. Gawlik
President & CEO

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STATE OF ILLINOIS
Pollution Control Board

PC#102

September 29, 2009

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD IN THE MATTER OF:

**PROPOSED AMENDMENTS TO THE BOARD'S SPECIAL WASTE
REGULATIONS CONCERNING USED OIL**

35 ILL. ADM. CODE 739, 808, 809

R06-20 (Rulemaking - Land)

Dennis Kelly commends the Board for its carefully considered proposal to improve used oil regulations in the State of Illinois.

Eliminating the requirement for unnecessary and duplicative manifests will reduce paperwork and costs. This is important to large and small businesses alike. Under the Board's proposed amendments the tracking of used oil shipments will continue. However, the process for doing so will be much more efficient and cost-effective.

The proposed amendments will help provide continuity and similar processes as seen in other states, while reducing the current burden on businesses in Illinois.

Dennis Kelly urges the Board to adopt its proposed amendments without any changes.

Sincerely,

Dennis R. Kelly



There's More to Moore Than Oil

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OCT 05 2009

STATE OF ILLINOIS
Pollution Control Board

PC# 103

Before the Illinois Pollution Control Board

In the Matter Of:

Proposed Amendments to the Board's Special Waste Regulations Concerning Used Oil.

35 ILL. Adm. Code 739,808,809

R06-20

(Rulemaking - Land)

I, Andrew Haag, President of Moore Oil Environmental commends to the Board for its carefully considered proposal to improve used oil regulations in the State of Illinois. Eliminating the requirement for unnecessary and duplicative manifests will reduce paperwork and costs. This is especially important for small business. Under the Board's proposed amendments the tracking of used oil shipments will continue but will be much more efficient and cost effective.

The proposed amendments will help level the playing field by reducing the burden on businesses in Illinois. These burdens are not imposed on businesses in other states.

I urge the Board to adopt its proposed amendments without any changes.

Sincerely,

Andrew Haag
President
Moore Oil Environmental
414-353-2489

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STATE OF ILLINOIS
Pollution Control Board



(864) 573-7400 PHONE
(864) 585-3635 FAX
johnfaris@oilmens.com EMAIL

P.O. Box 2807
Spartanburg, SC 29304
www.trucktanks.com

September 29, 2009

PC#104

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RE: Proposed Amendments To The Board's Special Waste
Regulations Concerning Used Oil

35 ILL. ADM. CODE 739, 808, 809

R06-20
(Rulemaking – Land)

Oilmen's Truck Tanks disagrees strongly with the current unnecessary manifests. This system produces extra cost and a duplication of effort.

We recommend to the board that they improve the used oil regulations in Illinois.

The burden on the used oil collectors in Illinois will be greatly reduced by the proposed amendments.

Oilmen's Truck Tanks hopes the board will adopt the new amendments without any further changes.

Sincerely,

OILMEN'S TRUCK TANKS INC.


John P. Faris
Chairman

JPF/ds

Ricky's Oil Service, Inc.

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STATE OF ILLINOIS
Pollution Control Board

September 29, 2009

BEFORE THE ILLINOIS POLLUTIONS CONTROL BOARD IN THE MATTER OF:

PROPOSED AMENDMENTS TO THE BOARD'S SPECIAL WASTE REGULATIONS
CONCERNING USED OIL

35 ILL. ADM. CODE 739.808.809

R06-20

(Rulemaking – Land)

PC#105

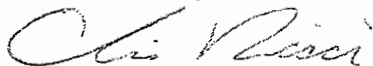
Ricky's Oil Services commends the Board for its carefully considered proposal to improve used oil regulations in the State of Illinois.

Eliminating the requirement for unnecessary and duplicative manifests will reduce paperwork and costs. This is especially important for small businesses. Under the Board's proposed amendments the tracking of used oil shipments will continue – but will be much more efficient and cost-effective.

The proposed amendments will help level the playing field by reducing the burden on businesses in Illinois. These burdens are not imposed on businesses in other states.

Ricky's Oil Services urges the Board to adopt its proposed amendments without any changes.

In Addition: the Illinois Pollution control Board may want to look at NORA'S Best Management Practices documents on Used Anti-freeze. The Florida E.P.A. has adopted these documents regarding collection, management and recycling of Used anti-Freeze in their State. Ricky's Oil Service practices these requirements on a regular basis.



Chris Ricci
President
Ricky's Oil Service



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STATE OF ILLINOIS
Pollution Control Board

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#180-184
Houston, TX 77062
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cell: 713.208.8736
fax: 281.754.4185
e-mail: benc@vertexenergy.com
www.vertexenergy.com

PC#106

September 29, 2009

Before the Illinois Pollution Control Board

In the Matter of:

Proposed amendments to the Board's special waste regulations concerning used oil

35 ILL. ADM. CODE 739, 808, 809
R06-20
(Rulemaking – Land)

I, Benjamin P. Cowart, Chairman & CEO, Vertex Energy, Inc., commend the Board for its carefully considered proposal to improve used oil regulations in the State of Illinois. I feel eliminating the requirement for unnecessary and duplicative manifests will reduce the paperwork and costs. This is especially important for small businesses. Under the Board's proposed amendments, the tracking of used oil shipments will continue – but will be much more efficient and cost-effective.

The proposed amendments will help level the playing field by reducing the burden on businesses in Illinois. These burdens are not imposed on businesses in other states.

I urge the Board to adopt its proposed amendments without any changes.

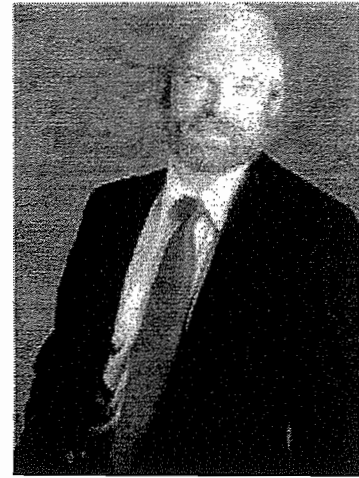
Yours truly,

BENJAMIN P. COWART

CHAIRMAN & CEO
VERTEX ENERGY, INC.



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STATE OF ILLINOIS
Pollution Control Board



September 29, 2009

PC#107

Ms. Vickie Custer
NORA Illinois Working Group Chairperson

Reference: Proposed Amendments to the Board's Special Waste Regulations Concerning Used Oil

Dear Ms. Custer:

I would like to express my appreciation to the Board for its proposal to improve used oil regulations in the State of Illinois. Eliminating the requirements for unnecessary and duplicate manifests will not only reduce the amount of paperwork involved but will also lessen the costs. Although I realize that this will not eliminate the Board's tracking of used oil shipments but it seems to me that it will be extremely cost effective and definitely more efficient.

To me it seems that the amendments will keep everyone on an even keel and will reduce the encumbrance on Illinois businesses. These imposed burdens are not a part of doing business in other states.

I, Donald Kleine, owner of Vortex Recycling urge the Board to adopt its proposed amendments without any changes.

Sincerely,

A handwritten signature in black ink that reads "Donald R. Kleine". The signature is written in a cursive style with a large initial 'D'.

Donald R. Kleine
Owner

Western Oil, INC.
An Environmental Service Company

P.O. Box 518
Lincoln, RI 02865-0518

Phone 401-727-8600
Fax 401-727-7667
Email: info@westernoil.com or visit www.westernoil.com

September 30, 2009

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OCT 05 2009

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

**IN THE MATTER OF: PROPOSED AMENDMENTS TO THE BOARD'S SPECIAL USES
REGULATIONS CONCERNING USED OIL**

STATE OF ILLINOIS
Pollution Control Board

35 ILL. ADM. CODE 739, 808, 809

R06-20 (Rulemaking – Land)

PC#108

COMMENTS OF WESTERN OIL, INC.

Western Oil, Inc praises the Board for its carefully well thought-out proposal to improve used oil regulations in the State of Illinois. Eliminating the requirement for redundant and duplicative manifests will reduce paperwork and costs. This is especially important for small businesses. Under the Board's proposed amendments the tracking of used oil shipments will continue – but will be much more efficient and cost-effective.

The proposed amendments will help level the playing field by reducing the burden on businesses in Illinois. These burdens are not imposed on businesses in other states.

Western Oil, Inc. urges the Board to approve its proposed amendments without any changes.

Sincerely,

Jared Raftery
Vice President
Western Oil, Inc



SOUTHWEST OIL, INC.
17348 DEER CREEK DRIVE
ORLAND PARK, IL 60467
(708) 460-3245 - FAX (708) 460-3328

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OCT 05 2009

STATE OF ILLINOIS
 Pollution Control Board

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

Pct#109

IN THE MATTER OF:)
 PROPOSED AMENDMENTS TO THE)
 BOARD'S SPECIAL WASTE REGULATIONS) R06-20
 CONCERNING USED OIL) (Rulemaking – Land)
 35 ILL. ADM. CODE 739, 808, 809)

COMMENTS OF SOUTHWEST OIL, INC. 9/30/2009

Thank you for this opportunity to provide public comment in the above-referenced rulemaking proposed amendment. I submit this comment on behalf of Southwest Oil, Inc, a member of NORA. Southwest Oil has over 34 years of experience and service in the industry and is founded on the service we provide our customers. This commitment to service, extends to every customer by maintaining an uncompromising standard to compliance and integrity, encouraging Illinois businesses to properly handle their recyclable waste.

Southwest Oil is grateful to the board for their time and careful consideration of this rulemaking proposed amendment to improve used oil regulations through paperwork efficiency and eliminating the disadvantages Illinois businesses experience in doing business in Illinois than in neighboring states.

Eliminating the requirements for unnecessary and duplicative manifest will reduce the burdensome paperwork and cost. These burdens are not imposed on business in other states. The proposed rulemaking will reduce the burden on Illinois businesses and create the ability for Illinois businesses to have an opportunity to compete in these hard economic times. Under the Board's proposed amendments, the tracking of used oil shipments will continue with the added benefit of being more efficient and cost effective.

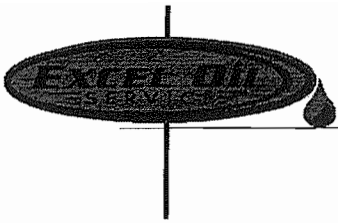
Southwest Oil, again thanks the Board for their time, and urges the Board to adopt its rulemaking proposed amendment without any changes.

Sincerely,

Victoria M. Custer

Victoria M. Custer
 Vice President

VMC/dt



EXCEL ENVIRONMENTAL, INC.

Special Waste Removal and Environmental Consulting

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OCT 05 2009

STATE OF ILLINOIS
Pollution Control Board

September 28, 2009

BEFORE THE ILLIOIS POLLUTION CONTROL BOARD

PC#110

IN THE MATTER OF:)	
PROPOSED AMENDMENTS TO THE)	
BOARD'S SPECIAL WASTE REGULATIONS)	R06-20
CONCERNING USED OIL)	(Rulemaking-Land)
35 ILL. ADM. CODE 739, 808, 809)	

Comments of Excel Environmental, Inc.

Excel Environmental, Inc. would like to thank the Illinois Pollution Control Board for its diligence and statutory consideration concerning the used oil regulations in the State of Illinois. Duplication of paperwork is an unnecessary burden, especially during this difficult economic downturn. Your decision is a true reflection of the ultimate purpose of the "Paperwork Reduction Act". Due to the Illinois Pollution Control Board's prudent determinations the paperwork trail for "Used Oil " shipments will be more proficient and improve the productivity and bottom line of the Illinois business community.

Excel Environmental respectfully requests that the Illinois Pollution Control Board adopts the proposed amendments without further alternations

Yours Truly,

Kenneth Petruck
President

Excel Environmental, Inc.
P.O. Box 5010
400 Ashland Avenue
River Forest, IL 60305

Phone: 708-366-0440
Fax: 708-366-0707

E-mail: exceloil@yahoo.com
www.exceloilserv.com





The Responsible Solution

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OCT 05 2009

STATE OF ILLINOIS
Pollution Control Board

PCTE/86

September 29, 2009

Ms. Dorothy Gun
ILLINOIS POLLUTION CONTROL BOARD
James Thompson Center
100 West Randolph Road
Suite 11-500
Chicago, IL 60601

**RE: PROPOSED AMENDMENTS TO THE BOARD'S SPECIAL WASTE REGULATIONS
CONCERNING USED OIL, 35 ILL. ADM. CODE 739, 808, 809 (R06-20)**

Dear Ms. Gun,

Thermo Fluids Inc. (TFI) applauds the Illinois Pollution Control Board's decision to eliminate the need to use a uniform hazardous waste manifest for all used oil shipments. The transportation document requirements are already addressed by the Federal Used Oil Management System and the new amendments will encourage the recycling of used oil.

It is note worthy to mention the state of Arizona tried to track used oil manifests when they adopted the Federal Used Oil Management Standards. Arizona quickly rescinded the requirement. TFI believes this decision will reduce the administrative burden required to manage manifests for used oil shipments.

TFI believes Illinois is making the right amendment in this bill to encourage recycling. Our hope is that the state will promote these regulatory improvements to other valuable resources, such as used antifreeze. Used antifreeze is a sought after commodity that is recycled in the Southwest United States without requirements for manifesting and special use permits.

For the reasons listed above, TFI agrees with the Board to adopt its proposed amendments without any changes.

Should you have any further questions or comments please contact me at (602) 477-8623.

Sincerely,
THERMO FLUIDS INC.

Troy Hacker
Corporate Environmental, Health & Safety Manager

Mountain States Region
3534 West 500 South
Salt Lake City, UT 84104
801.433.1114 Main
801.433.1120 Fax

Northwest Region
12533 SE Carpenter Dr.
Clackamas, OR 97015
503.788.4612 Main
503.788.4629 Fax

South Central Region
9900 North Crowley
Crowley, TX 76036
806.637.9336 Main
806.637.4505 Fax

Southwest Region
4301 West Jefferson St.
Phoenix, AZ 85043
602.272.2400 Main
602.272.5590 Fax

Corporate Office
8925 E. Pima Center Pkwy, #105
Scottsdale, AZ 85258
480.302.6221 Main
480.302.6599 Fax

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

**PROPOSED AMENDMENTS TO THE
SPECIAL WASTE REGULATIONS
CONCERNING USED OIL
35 ILL. ADM. CODE, PARTS 739, 808, 809**

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OCT 05 2009

**STATE OF ILLINOIS
Pollution Control Board**

CERTIFICATE OF SERVICE

I, CHRISTOPHER HARRIS, an attorney, hereby certify that I filed with the Office of the Clerk of the Illinois Pollution Control Board the following documents:

Comments of Ronald D. Swanson, CFO, Como Lube and Supplies
Comments of John Simon of Curran Contracting
Comments of Gary Gunderson, President, Recycle Technologies/Max Safe Antifreeze
Comments of James Noble, President, Noble Oil Services
Comments of Richard Kalin, Chief Operating Officer, Noble Oil Services
Comments of John W. Van Hoesen of North Branch Environmental
Comments of Rick Adams of Total Recycling Technologies
Comments of Ray Mt. Joy, President, Xeray Systems, Inc.
Comments of Victoria M. Custer, Vice President, Southwest Oil, Inc.
Comments of Jared Raftery, Vice President, Western Oil, Inc.
Comments of Donald Kline, Owner, Vortex Recycling
Comments of Benjamin P. Cowart, Chairman and CEO, Vertex Energy, Inc.
Comments of Chris Ricci, President, Ricky's Oil Service
Comments of John P. Faris, Chairman, Oilmen's Truck Tanks, Inc.
Comments of Andrew Haag, President, Moore Oil Environmental
Comments of Dennis R. Kelly of Dober Research Works
Comments of Thomas J. Gawlik, President and CEO, ESI Environmental, Inc.
Comments of Kenneth Petruck, President, Excel Environmental, Inc.
Comments of Troy Hacker, Corporate Environmental, Health and Safety Manager,
Thermo Fluids, Inc

and will cause the same to be served upon the following persons by sending it via first class mail, United States Postal Service on September 30, 2009.

John T. Therriault, Assistant Clerk
Tim Fox, Esq., Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph Suite 11-500
Chicago, Illinois 60601

Stephanie Flowers, Esq.
Illinois Environmental Protection Agency
P.O. Box 19276
Springfield, Illinois 62794-9276

Christopher Harris

Christopher Harris
1511 West Babcock
Bozeman, Montana 59715