

September 29, 2009

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

Pct# 86

RECEIVED
CLERK'S OFFICE
OCT 05 2009
STATE OF 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)**

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 Arizona quickly rescinded the requirement.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