



**Illinois  
Recycling  
Association**

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July 26, 2004

AS 04-2

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STATE OF ILLINOIS  
POLLUTION CONTROL BOARD

Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph St., Suite 11-500  
Chicago, IL 60601

Dear Sir or Madam:

The Illinois Recycling Association respectfully submits this letter in support of Falcon Waste & Recycling Inc.'s petition for an adjusted standard ruling regarding their shingle recycling process. In our view, this process should be considered a legitimate recycling process, not waste handling or waste disposal, and therefore the petitioners should not be required to obtain waste handling permits. Falcon's process involves obtaining post manufacturing shingle material and through a clean grinding process, creates a recycled content commodity in the form of alternative driveway paving. This new product made from recycled material is a perfect example of the statutory definition of recycling "**...any process by which materials that would otherwise be disposed of or discarded are collected, separated or processed and returned to the economic mainstream in the form of raw materials or products.**" Falcon's process prevents the shingle scraps from being sent to the landfill for disposal by making a new product out of them. The market for this product is not based on speculation. There is a demonstrated market in terms of standing orders for this product. This product has been tested in use and proven effective for its stated application.

The Illinois Recycling Association believes it is very important for the IEPA and the IPCB to approve the development of this type of creative and innovative market development that increases the recycling industry's ability to serve as a significant economic driver in Illinois. Innovative processes such as Falcon Waste and Recycling Inc.'s, should be embraced and applauded for finding ways to keep otherwise hard to recycle materials out of landfills and into the productive economy in an environmentally friendly way. Thank you for your consideration in this matter.

Respectfully,

Michael Mitchell  
Executive Director

Cc: John Kim



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