



Construction Materials Recycling Association  
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STATE OF ILLINOIS  
Pollution Control Board

AS 04-02  
PC #13

To: Illinois Pollution Control Board

RE: Case AS 2004-002

The CMRA is a 501c3 non-profit organization that promotes the recycling of construction and demolition (C&D) materials. Included in that purview are asphalt shingles, which hold promise as one of the more recyclable materials in construction and demolition activity. Proof of that comes from the website we developed under a grant from US EPA, [www.shinglerecycling.org](http://www.shinglerecycling.org). Indeed, that agency, as well as most state environmental agencies, and virtually all recycling professionals, consider us the leading experts on recycling C&D materials, especially asphalt shingles.

It is with great interest we have followed Illinois EPA's attempts to thwart Falcon Waste & Recycling's plans to recycle asphalt shingles. No other state in the union has ever questioned that the processing of this manufacturer's waste is a safe, environmentally friendly activity, or that the activity should fall under their regulations regarding waste. It is obviously recycling. In fact, a look at Illinois recycling statutes verify this: "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 materials or products..."

But it doesn't take a recycling professional to realize what Falcon proposes to do is recycling, and only the first step toward making Illinois more environmentally friendly. One suspects there is more to the IEPA opposition than just a grasp to maintain control of another material. Also, any company that tries to recycle shingles in this state knows the IEPA won't give them a permit for the activity. Why? For one thing, the landfill company currently accepting the waste will be out probably nearly \$1 million annually in disposal costs if the IKO shingle material is diverted to a recycling activity, and no landfill company will let that go easily. Landfill lobbyists camp in the IEPA Springfield office, and only someone naïve or from another state would think there is not pressure being brought to bear on IEPA in this matter. In addition, whatever governmental entity—state, county, or local—receiving a host fee from the disposal of that material is going to fight to stop the flow of the material to another jurisdiction.

We deal with virtually all state environmental agencies across the country, in addition to the US EPA and innumerable local agencies. Illinois EPA is probably the most detrimental to recycling and reuse of all the state environmental agencies, and sadly is an embarrassment to all of us residents working to improve the environment. We hope IEPA will come to its senses, quit grasping at the straws outlined in its response to the petitioner's brief, and join the rest of the country into supporting the environmental benefits of shingle recycling.

William Turley  
Executive Director