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STATE OF ILLINOIS
Pollution Control Board

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NOTICE OF FILING

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

AMENDMENTS TO PERMITTING)
FOR USED OIL MANAGEMENT AND) R99-18
USED OIL TRANSPORT) (Rulemaking-Land)
35 IL ADM. CODE 807 AND 809)

P.C. # 18

NOTICE OF FILING

TO: Persons on the attached service list (via U.S. Mail)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board the comments of Lenz Oil Service Peoria, Inc. a copy of which is herewith served upon you.

Michael Lenz

(Name of Lenz Representative)

Date: *9-23-99*

Lenz Oil Service Peoria, Inc.
3001 SW Washington Street
Peoria, IL 61602
(309) 676-0211

**COMMENTS AND RESPONSES TO THE IEPA'S USED OIL 807 PERMITTING
PROPOSAL AND AUGUST 23RD HEARING TESTIMONY**

Re: Docket R 99-18

Mr. Dragovich stated that unpermitted facilities can easily relocate and change company names and that inspections are infrequent at unpermitted facilities.

Response: Facilities relocate due to customer demands and industry changes and need to be able to react to these demands and changes quickly to survive in the very competitive used oil industry. Inspections do not have to be infrequent at used oil facilities. That is an agency policy choice. Under current requirements, facilities are already required to notify any change in location or operations of any off-specification used oils under US EPA and IL Special Waste Regulations.

Mr. Dragovich stated that the proposed regulations would not regulate marketers of on-specification fuel if the used oil also met the definition of "re-refined oil" in Section 3.36 of the Illinois environmental Protection Act (415 ILCS 5/3.36)("Act").

Response: Placing a requirement on EPA on-specification used oil that it also must meet the definition of re-refined oil to not be considered a special waste is unrealistic. "Re-refined oil" is used oil that has been re-refined to make a new lube oil base stock for lubricating oil and does not apply to the used oil fuel universe. It was never USEPA's intention or understanding that on-specification used oil would meet substantially the same standards as new oil. USEPA did say that on-specification fuel oil was virtually equivalent to virgin fuels. However, their comparisons were not only against new oil, but all virgin fuels, including coal, due to the fact that used oil could be and is used as an alternative to coal. IEPA is concerned that even though the oil was on-specification it could still have no value due to a high BS&W level, and that aspect caused them concern about allowing unpermitted storage of such. To address the "value" issue, NORA proposed a maximum BS&W limit also be placed on on-specification fuel. This would allow recyclers and generators alike to be able to determine when a used oil destined for a fuel exits regulation as a special waste. Having that definition be achieved on a permit by permit basis and be defined differently, from permit to permit would cause a lot of confusion to recyclers, and especially generators of the regulated community. Imagine the confusion if IEPA or US EPA left up what the definition of a hazardous waste was on an individual permit by permit basis. In either case, generators would be totally confused because this definition could potentially change every time they used a different recycling or disposal company. We feel a universal definition must be achieved for all to go by in the state, and that the requirement of it meeting the re-refined definition is inappropriate and unacceptable.

Mr. Dragovich mentioned fifty-six former used oil management sites that IEPA has or will have to act on.

Response: It was failed to mention however that most of those sites are generator sites. Even under the proposed 807 permitting program, generator sites would be exempt from permitting, so these examples are largely irrelevant. Mr. Dragovich also states that many

used oil management sites that operated before 1985 have had environmental problems. Here we want to point out two important points. First, the actual Facility Management Standards did not become law until 1993 in Illinois, not 1985. Secondly, the problems at those sites may have been discovered recently, or action taken on them recently, but the problems were actually created in the sixties and seventies for the most part. Also, again, there are major problems with the examples in Attachment 2 to Mr. Dragovich's testimony. Examples one, two, four, and ten, are not "used oil problems". They are problems that occurred but the requirements over such activities are regulated not by the EPA, but by the State Fire Marshall and/or OSHA. And in the case of example number two, (which was our facility) the explosion was due to a welding contractor error. However, due to the fact we had already brought the tank farm facility up to the Used Oil Management Standards, the facilities tank farm had impervious containment. Therefore, even though there was an explosion and an instant release of over 15,000 gallons of used oil, over 99% of that oil was recovered and no environmental harm occurred. This example proves that the used oil performance standards work and if tank releases do occur, the impervious secondary containment and applicable SPCC requirements adequately address the potential environmental harm. Examples five, six, seven, twelve, thirteen, and fourteen, are TSCA violations and would not be regulated any more strictly under 807 permits. The remaining problems are all well addressed under the current 739 regulations.

Mr. Dragovich's stated that according to the current requirements of Parts 739 and 809, used oil generators are already subject to the manifesting requirements of Part 809, and that these generators have obtained Illinois ID numbers and are currently using manifests. Response: Automotive used oil generators have not previously been required to obtain Part 809 ID numbers and manifest their oil due to the fact most recyclers have in the past, and are still, using the old multi-stop method of using one manifest for the load, plus a log of where that loads oil came from. We know of no recyclers in the state that have been told by IEPA they had to discontinue this practice. We also do not know of any notification sent out to recyclers concerning this issue or to automotive generators alerting them to the fact that they now needed to obtain ID numbers, after years of IEPA telling them they did not when they inquired or were inspected due to the multi-stop permits. This apparent change of agency philosophy was totally unknown by the regulated community, and recyclers and generators were not notified of this change. In fact, in 1996 we were told to go on doing things as we had under the old multi-stop permit until the agency could better determine how they wanted to handle the situation. The IEPA also told NORA that the agency was considering dropping the manifesting requirements for used oil in Illinois, in 1996. Apparently much confusion exists currently in this area. However, we estimate that less than 10% of automotive used oil generators have IL EPA ID numbers and are manifesting their individual oil pick-ups. So this requirement would require tens of thousands of automotive generators to register. We also want the Board to be aware that even when manifesting used oil, no copies are required to be sent to the agency, as is the case with hazardous waste. Therefore, the tracking aspect of the manifesting requirements is basically lost to the agency anyway.

In Mr. Dragovich's prefiled testimony response to Mr. Harris's statement that his previous testimony failed to identify a single actual problem that would not be addressed by the Used Oil Management Standards, the real issue surfaces. As is under current regulation, used oil recyclers are ultimately responsible as to how they will run their facilities and operations to achieve continuing compliance with the regulations. Under the 807 proposal, IEPA wants to make more of those determinations. For instance, IEPA states "the contents of the tank may impact the rate of corrosion that will occur in a metal tank". The "contents" in a used oil facility are normally oil. Internal corrosion just is not a problem in the real world of oil storage. Tanks used for used oil storage experience little internal corrosion, even after many years of use. By reviewing the proposed management standards issued to Lenz Oil in 1995 and our response to them (previously submitted), you can see there can be a large difference of opinion of what is needed to achieve compliance by the recycler versus the agency in this one instance. This is where the concern comes into play, that the permit and conditions felt needed by the agency could become overkill, costing the IL recycler their competitiveness versus their out of state competitors due to the costs incurred complying with these operating conditions, and straight jacketing the permittee from being able to quickly react to customers, industry, or competitors changes and challenges. We're not against regulation, but we are an unsubsidized, stand alone industry and because of such need to operate freely in the free market system we are competing against (our out of state competitors and the virgin fuel market). Going any further than the 739 regulations will not allow that to happen. If this is what is desired by government, then we feel the government would also need to subsidize the industry to enable it to compete in the free market due to the additional burdens placed on it from a cost and reaction competitive standpoint by further regulation than what 739 prescribes.

In Mr. Dragovich's prefiled testimony, he answered a question we had posed concerning multi-stop type permits. Mr. Dragovich's testimony here reflects another long term problem recyclers had under 807 permitting in the past. Multi-stop permits should be issued under Part 809 transporter permits and not under Part 807 facility permits. Multi-stop permits are a transportation issue not a facility issue. Out of state competitors collecting used oil in Illinois need multi-stop permits and IEPA has no authority to issue them under Section 807. If required, having multi stop permits issued under Section 809 would level the playing field for instate and out of state recyclers alike operating in Illinois.

Mr. Dragovich stated that the proposed amendments to Part 809 would eliminate the manifesting and special waste hauling permit requirements for all used oil transported to a used oil collection center or aggregation point.

Response: However, as proposed, 809.211 restricts a generator of over 220 pounds a month of special waste from self transporting their used oil in small shipments of fifty-five gallons or less to a used oil processing facility unless they obtain a special waste hauling permit. We feel that these generators who want to haul small amounts of their used oil to a used oil processing facility for recycling should be allowed to do so without a transporter permit, as is allowed under Section 739. Requiring a permit to do such, as is

the case with the agency's proposal, reduces the incentive for such generators to recycle their oil. Generators that generate less than 220 pounds of special waste a month are already exempt from obtaining a special waste hauling permit and manifesting under current regulation, up to fifty-five gallons at a time, and are free to take their used oil anywhere for recycling. Therefore, this part of IEPA's proposal only effects generators of over 220 pounds of special waste per month. Currently they must have a special waste hauling permit under 809 and manifest the oil. Under EPA's proposal, they will not have to do this if going to a collection center or aggregation point, but would have to if going to a 807 permitted facility like a used oil processor. NORA's proposal contains a provision to drop this requirement for a special waste hauling permit and manifesting for any and all generators that want to self transport fifty-five gallons or less at a time for recycling to a oil collection center, aggregation point or processor. This would, where economically attractive to the generator, further encourage used oil recycling over IEPA's proposal. We have generators currently delivering single fifty-five gallon drum shipments to our processing facility. Some of them may be over 220 pounds per month generators, but this information is very hard to obtain and track. Allowing all generators to transport fifty-five gallons or less themselves without a permit and manifest would allow us to encourage such self transportation. Due to the fact we have a hard time telling if the generator is exempt or not, we currently discourage all unmanifested deliveries. We can see no reason to restrict such activities.

Mr. Dragovich stated that "the requirement to obtain a Part 807 permit would not be unduly burdensome to a well-run facility which is currently operating in compliance with Part 739."

Response: Well, that depends. It depends on the additional conditions, design and operating standards imposed on the facility. As we stated, we feel the 1995 proposed permit draft to Lenz Oil would be unduly burdensome. Further, Mr. Dragovich's testimony that the federal regulations allow states to be more stringent, and impose state regulations, seem to indicate the agency's thinking has not changed much since the 1995 proposed permit draft. Further evidence of this is the fact that Mr. Merriman stated at the hearing that "this is just the proposal to require permits to go back to the status quo, and isn't even completely the status quo because we've left out some and because we'll be implementing through that permit Part 739", and that the permits would be less onerous than the past permits (I believe he meant over the 1995 proposed permit), because certain things that 739 has done and to clarify obligations and to limit testing and some other kinds of things. Mr. Dragovich also indicated in the hearing that IEPA would not be trying to establish operating standards under 807 permit conditions. However because the complexity of the previous 1995 draft permit, and secondly, because the draft permit was promulgated two years after the 739 regulations were adopted, we are somewhat skeptical of how far IEPA wants to go concerning permit conditions, etc. If they only want to enforce 739 conditions, why did they add so much more two years after adopting the 739 regulations, as proposed permit conditions? Most states have seen the folly of adding more stringent state regulations on top of the 739 regulations due to just the reasons we have brought up in these comments and our previous comments. Illinois oil recyclers either need to compete freely in the market place, or at least as freely as their competitors (virgin fuel distributors and out of state oil recyclers).

Mr. Dragovich stated that requiring a used oil marketer who markets used oil other than that generated by its own activities from the site where it is generated to obtain an Part 807 permit is consistent with the Act because the definition of "transfer station" in Section 3.83 of the Act includes shipments of waste that are stored for less than 24 hours if transfer is involved, Section 3.47 includes transfer stations in the definition of storage site, and Section 21(d) of the Act requires all storage sites to obtain a permit.

Response: Used oil that sits somewhere for less than 24 hours is in transit. Those locations could be different every time depending on where the oil is coming from. In these situations, the oil is not in a transfer facility nor in storage at all, it's stopped in a truck awaiting someone else to add to it or move it further. Requiring permitting for each and every place this may need to be done, every time it may need done, is impossible due to constantly changing needs of the recycler, such as where the oil is ultimately going, who and where it's coming from, etc. This requirement would severely restrict the recyclers most economical means of transport in many cases. There are already adequate DOT and oil pollution act laws on the books to regulate this type of activity. In addition, this activity is not permitted for even hazardous waste shipments. Also, concerning actual transfer facilities, we realized after reading the August 23rd hearing transcripts, that there was not much discussion about transfer facilities. Transfer facilities are becoming much more important to recyclers in an effort to keep transportation costs as low as possible. Mr. Dragovich states in IEPA prefiled testimony to the August 23rd hearing in response number three and number twelve that transfer facilities should be permitted as a "facility" under Part 807, and would be under IEPA's proposal. Under part 739 regulations, a transfer facility is as a facility used for bulking up loads of used oil and can hold oil for up to thirty-five days, and is considered part of the transporters activities. This oil is usually untested or uncertified as to meeting the EPA specifications. Where oil is held under 24 hours the "facility" is not considered a transfer facility under Section 739 regulations. IEPA not only wants to permit transfer facilities, but also transporters and marketers that store oil less than 24 hours as stated above, and states that the Act provides for this. This is very odd due to the fact that even some hazardous waste marketers or brokers and hazardous waste transfer facilities are not required to obtain any type of "facility" permit as far as we know. In fact, the 739 transfer facility regulations are much more comprehensive than the hazardous waste transfer facility regulations (Part 723), requiring impervious secondary containment, which is not required, even at hazardous waste transfer facilities. We question why used oil marketers or brokers and used oil transfer facilities need "facility permits", and need to be regulated more heavily than hazardous waste transporters and transfer facilities in many cases? Also, as we stated in our previous comments and above, if a recycler leases a spot as a 24 hour point, or leases all or part of a small tank farm for use as a transfer facility, requiring the owner of those properties to obtain a "facility permit" would effectively remove them from the market for used oil recyclers, causing severe transportation and competitive issues for Illinois recyclers. As stated in our earlier comments, we would have no problem notifying IEPA of locations of transfer facilities and certifying they meet the Used Oil Management Requirements as a requirement of our Special Waste Transporters permit, but that burden has to be on the recycler, not the facility owner, or as stated we will find no one interested in leasing us storage or property. Due to the fact this is a

“transportation” issue and hinges on where and how many used oil generators we service in a given area, it would not be prudent to purchase our own facility or land for this purpose because it may be a shorter term need. Leasing or renting is a much smarter business decision for these locations, and therefore, requiring the “owner” of the property to obtain the permit would persuade 99% of the “owners” to not offer such an arrangement to a used oil recycler. In addition, we also feel it would be impossible to list accurately 24 hour transporters “facilities”. As stated, these will constantly be changing due to customer and industry changes and are often not even a leased property, perhaps just a customers parking lot in many instances.

In Mr. Dragovich’s final prefiled testimony comment, he states that 60% of automobile drivers change their own oil. This is a very important point. Sixty percent of all automotive oil sold gets into the recycling system, completely voluntarily. Why do these generators use the “system”? Because it costs generators very little to nothing to do so. Putting expensive permit conditions and design and operating standards on a recyclers facilities in Illinois will insure the costs get passed along to the transporter trying to sell the oil to the recycler, and then to the oil collection Do-It-Yourself (DIY) point, with the DIYers ultimately paying for it in two ways; reduced locations available to drop off the oil due to IL recyclers going out of business or moving out of state, and increased costs the DIYers will have to pay to get rid of their oil. Under this scenario, we predict they will still “get rid” of the oil, but not as much will go into the recycling system, that’s for sure. Costs to generators (DIY and commercial) for recycling, heavily impacts generator proper disposal habits, very heavily. USEPA understood this in developing the 279 (IL 739) standards. Too much expensive regulation of used oil can actually be worse than too little, for the environment.

Mr. Eastep testified that three problems are often encountered at used oil facilities. Let’s address these problems:

- 1) Handling: Under the 739 management standards, areas where used oil is loaded or unloaded must now have impervious secondary containment. This, has stopped the contamination issues from handling the Mr. Eastep eluded to.
- 2) Storage in tanks and containers: Again, totally these areas are required to have impervious secondary containment where overfill of tanks or leaking containers could occur.
- 3) Equipment and piping: Buried piping is now regulated by the UST regulations. Above ground piping is again required to have impervious secondary containment, as is any processing equipment.

All three of these examples are now regulated by the Used Oil Management Standards to adequately protect the environment and stop the problems that Mr. Eastep eluded to. Also, leaks and spills in the areas are also required to be promptly cleaned up under the Used Oil Management Standards.

Mr. Eastep provided a summary list of problem used oil sites. All these sites operated from the 1960’s or 70’s on, however, all but two never operated under the Federal Used Oil Facility Management Standards (IL Part 739 Standards). In fact, all but two were closed prior to the Used Oil Facility Management Standards even being enacted. The

two that continued to operate in the 90's, after the Used Oil Management Standards were enacted, have problems stemming from past actions from the 60's through the 80's that are plaguing those sites. The point here is that the major problems and pollution encountered happened before the current Facility Management Standards were enacted and could not happen today, legally, under those standards.

Mr. Eastep also brought up another very important fact. He stated that frequently used oil recyclers claim not to have the funds to properly clean up their facilities. I want to state here that I believe this is not a "claim", and must be true when claimed for one important reason. If my company cannot clean up an owned facility, I personally could be held liable for these expenses. I wouldn't want that, no one would want that. No one would subject themselves and their families to that possibility, unless they had no choice. So that being said, why do some not have enough money? The unfortunate fact is because there is not a lot of money to be made in this business. If there was, you would see Pennzoil, Exxon, etc. in this business. There are some larger companies in this business, but they have continually lost money in it. Only the smaller, nimble, quicker to react independent companies have survived (and prospered at times) in this business. Are we all making enough money to make sure every possible expense will be covered if we were to later go out of business? No, we are not, in some cases. Is that bad? Yes, but what are the alternatives?

-Charge the generators a very high collection/recycling fee so we can be assured of that money? No, not when 60% of the oil needing recycled comes from completely unregulated voluntary DIY oil changers. Those users of the "system" along with a lot of rural commercial generators will not use the system if the costs are high. This would also result in recyclers volumes plummeting, forcing recyclers to charge the ones staying in the system, doing the right thing, even more, further compounding the problem.

-Have the government subsidize the industry? I think recyclers would readily go along with that, but where will the state or federal government come up with that money, and are they willing to do so?

The state could do some things that would help oil recyclers immensely. One is to drop the sales tax on all recycled oil products. This would give us an instant price advantage. And secondly, require or even just suggest that any burners explore the possibility of using Recycled Used Oil Fuel, in their air permits. Even a suggestion here would tell burners Recycled Fuel Oil is ok in the states and IEPA's eyes. This could make a huge difference and not cost the state anything! Many potential burners are scared of how the state and IEPA will react to them wanting to burn Recycled Fuel Oil. If anyone has any other suggestions, ourselves and NORA would be very interested in hearing them.

The used oil recycling system in place currently in Illinois, has evolved quite a bit into more of a commodity type operation since IEPA more or less exited the picture for the most part in 1996. Many changes have taken place in this industry in the past few years. Much more oil is being stored in commercial storage facilities, destined for use as a fuel in far away places, than just a few short years ago when many more end markets in Illinois existed for the oil. What's needed is just a little more oversight by the agency to make sure everyone is playing by the rules (the 739 rules), nothing more. EPA currently

holds the authority to oversee this activity, without 807 permits, using 809 and 739 granted authorities

In closing, we feel it's becoming clear to the Board why we don't want the straight jacket that Part 807 permitting would entail. IEPA seems intent on telling recyclers how to run many facets of their business, without knowing how those businesses actually operate, function, and survive in the real world. Also, a detailed permit that may work today may not tomorrow, in this ever changing industry. The 807 Proposal is a straight jacket recyclers can't contend with in this changing industry and a recipe for economic and environmental disaster, we feel. NORA's counter proposal to permit recyclers etc. under Part 809 will give IEPA the organizational structure to permit us, without all the expense to the recycler in applying and obtaining the permit we would have under Part 807, plus it would limit IEPA's leeway to add expensive permit conditions. We also estimate that the permitting time and expense, from start to finish, would be approximately one half of 807 permitting. In addition, NORA's proposal defines what is and isn't a special waste concerning used oil with a bright line that the regulated community (recyclers and generators) can see and understand. It allows us to operate freely, but with an organizational structure that IEPA can use to monitor us more closely than what is in place now. We hope the Board and IEPA understand our concerns, and feel NORA's 809 permitting proposal has merit. We would be willing to work with the agency in developing these permits. We feel the Board should adopt NORA's proposal.

We have also submitted, as requested a cost estimate for the engineering portion of submitting Part 807 permit applications. We estimate an additional minimum of \$5000 in company costs.

Sincerely,



Mike Lenz, President
Lenz Oil Service Peoria, Inc.

ML/br



Randolph & Associates, Inc.

Consulting Engineers - Surveyors

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Robert M. Randolph, P.E., M.B.A.
President & CEO

September 2, 1999

Mr. Mike Lenz
Lenz Oil Service, Inc.
3001 S.W. Washington
Peoria, Illinois 61602

Re: Cost Estimate for Development of Permit Applications for Used Oil Facilities
RAI Job #901.001

Dear Mr. Lenz:

Per your request, Randolph & Associates, Inc. has reviewed the information provided by the Illinois Environmental Protection Agency (IEPA), Division of Land Pollution Control, regarding the proposed permit application process for used oil facilities.

Our review included the following applicable forms and their associated instructions:

- LPC-PA1 *"General Application for Permit"*
- LPC-PA3 *"Application for a Solid Waste Management Permit to Develop Treatment and/or Storage Facilities"*
- LPC-PA4 *"Application for Operating Permit"*
- LPC-PA8 *"Certification of Siting Approval"*
- LPC-PA13 *"Application for a Permit to Develop a Used Oil Storage Facility"*
- LPC-PA16 *"Notice of Application for Permit to Manage Waste"*

Based upon review of the applicable forms and instructions, the following is a list of supplemental items which will be required to be addressed in each potential application:

- Development of Hydrogeologic Information
- Groundwater Modeling or Classification
- U.S.G.S. 7.5 minute Quadrangle Map
- Topographic Map with Contours of the Site
- Plan Sheets of the Entire Facility
- Process Flow Diagrams (PFDs)
- Narrative Description of the Facility Operations
- Description of Each Piece of Equipment

Mr. Mike Lenz
Lenz Oil Service, Inc.
September 2, 1999
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- Waste Characterization Plans
- Waste Analysis Plans
- Residuals (Description of Handling/Disposal of Residual Wastes Generated at the Facility)
- Contingency Plans
- Containment Systems
- Stormwater Run-on/Run-off
- Inspection Procedures
- Closure Plans
- Post Closure Use
- Site Suitability
- Demonstrations of Compliance with Existing Regulations

Based upon review of the information provided, Randolph & Associates, Inc. estimates the following costs for development and preparation of an LPC Permit Application for a typical Used Oil Facility (i.e. the Lenz Oil Facility located on S.W. Washington Street in Peoria, IL):

• Completion of the Actual Application Forms	\$3,000 to \$5,000
• Development of Supplemental Information required by the Forms	\$8,000 to \$12,000
• Development of a Topographic Map Using Standard Survey Equipment	<u>\$4,000 to \$7,000</u>
Total Costs*	\$15,000 to \$24,000

*Note: These estimates assume some use of previously developed and existing information such as Contingency Plans, Inspection Plans, and Equipment Description Lists.

Please feel free to contact our office at 309-693-8844 if there are any questions or if any additional information is required. My e-mail address is tsnarr@randolphinc.com.

Sincerely,

Randolph & Associates, Inc.



Todd W. Snarr, P.E.
Director, Environmental Engineering

SERVICE LIST (R 99-18)

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