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JUL 28 2006

USED OIL SERVICES, INC.
Licensed Special Waste Hauler

ILLINOIS
Pollution Control Board
25903 S. Ridgeland Avenue
Monee, Illinois 60449

July 26, 2006

ORIGINAL

PC#3

MS. DOROTHY GUNN, CLERK
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph
Suite 11-500
Chicago, Illinois 60601

RE: **R2006-020**

Dear Illinois Pollution Control Board Members:

Our company is writing you in regards to: In the Matter of Amendments to the Board's Special Waste Rules Concerning Used Oil, 35 Ill. Adm. Code 808, 809, RC 06-20.

Thank you for this opportunity to provide public comment in the above-referenced rulemaking. I submit this comment on behalf of RS Used Oil Services, Inc., a member of NORA. RS Used Oil Services is a used oil collector headquartered in Monee, Illinois. We have two other branches in Illinois that service Wisconsin and Missouri customers. RS has been in this business for over 25 years and we provide the same services in more than 15 states. Illinois is the only State to require these unnecessary and extremely costly procedures. RS Used Oil Services endorses and supports NORA's rule proposal and requests that the Board adopt the language proposed by NORA.

Special Waste manifesting for used oil, including those substances entitled to be regulated as used oil pursuant to federal and state regulations, is burdensome and unnecessary.

In closing, our company believes that the current manifesting requirements in Illinois for Used Oil and items regulated as Used Oil are unnecessary and burdensome. We strongly encourage the Board to adopt the language proposed by NORA. We look forward to the Board's adoption of NORA's rule proposal.

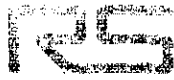
Sincerely,



Lee J. Plankis
Senior VP Operations

www.RSUsedOil.com

Phone: (708) 534-9300 • Fax: (708) 534-9400 • Toll Free: 1-866-RSUSED OIL



USED OIL SERVICES, INC.
Providing Recycling Solutions

Corporate Headquarters
25903 S. Ridgeland Avenue
Monee, Illinois 60449

July 26, 2006

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STATE OF ILLINOIS
Pollution Control Board

MS. DOROTHY GUNN, CLERK
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph
Suite 11-500
Chicago, Illinois 60601

PC#4

RE: R2006-020

Dear Illinois Pollution Control Board Members:

Our company is writing you in regards to: In the Matter of Amendments to the Board's Special Waste Rules Concerning Used Oil, 35 Ill. Adm. Code 808, 809, RC 06-20.

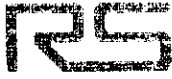
Thank you for this opportunity to provide public comment in the above-referenced rulemaking. I submit this comment on behalf of RS Used Oil Services, Inc., a member of NORA. RS Used Oil Services is a used oil collector headquartered in Monee, Illinois. We have two other branches in Illinois that service Wisconsin and Missouri customers. RS has been in this business for over 25 years and we provide the same services in more than 15 states. Illinois is the only State to require these unnecessary and extremely costly procedures. RS Used Oil Services endorses and supports NORA's rule proposal and requests that the Board adopt the language proposed by NORA.

Special Waste manifesting for used oil, including those substances entitled to be regulated as used oil pursuant to federal and state regulations, is burdensome and unnecessary.

In closing, our company believes that the current manifesting requirements in Illinois for Used Oil and items regulated as Used Oil are unnecessary and burdensome. We strongly encourage the Board to adopt the language proposed by NORA. We look forward to the Board's adoption of NORA's rule proposal.

Sincerely,

Rick Shipley
National Sales Manager



USED OIL SERVICES, INC.
Providing Recycling Solutions

Corporate Headquarters
25903 S. Ridgeland Avenue
Monee, Illinois 60449

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CLERK'S OFFICE

JUL 28 2006

STATE OF ILLINOIS
Pollution Control Board

ORIGINAL

PC#5

July 25, 2006

MS. Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph
Suite 11-500
Chicago, IL 60601

RE: R2006-020

Dear Illinois Pollution Control Board Members:

Our company is writing you in regards to: In the Matter of Amendments to the Board's Special Waste Rules Concerning Used Oil, 35 Ill. Admin. Code 808, 809, RC 06-20.

Thank you for this opportunity to provide public comment in the above-referenced rulemaking. I submit this comment on behalf of RS Used Oil Services, Inc, a NORA member. RS Used Oil Services, Inc has been in the business of recycling used oils for over 25 years. Our company has provided a valuable service to its customers by providing our services as an alternative to illegal disposal of used oils in addition to supplying a quality recycled product to end-users to minimize our countries dependency on foreign oil. RS Used Oil Services, Inc endorses and supports NORA's rule proposal and requests that the Board adopt the language proposed by NORA.

Special Waste manifesting for used oil, including those substances entitled to be regulated as used oil pursuant to federal and state regulations, is burdensome and unnecessary. RS Used Oil Services, Inc provides used oil recycling options to customers in 17 states. Illinois is the only state our company operates in requiring the use of a Special Waste manifest.

In our operations, we abide by the federal and state regulations concerning used oil, including the tracking requirements. Our company's internal paperwork has been reviewed by every state with the exception of Illinois and has approved as meeting the requirements in 40 CFR 279.46 for tracking used oil. We believe that the IEPA's position, as explained at the Board's hearing in this case, is inconsistent with the federal program requirements and does not promote used oil recycling, as envisioned by that program.

In closing, our company believes that the current manifesting requirements in Illinois for Used Oil and items regulated as Used Oil are unnecessary and burdensome. We strongly encourage the Board to adopt the language proposed by NORA. We look forward to the Board's adoption of NORA's rule proposal.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ronald A. Winkle".

Ronald A. Winkle
President