

EXCEL ENVIRONMENTAL INCORPORATED

Waste Oil
Services

Oil Cleaning
and Recycling

Environmental
Consulting



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STATE OF ILLINOIS
Pollution Control Board

PC#8

July 27, 2006

Ms. Dorothy Gunn, Clerk
Illinois Pollution Control Board
James A. 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. 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 Excel Environmental, Inc., a member of NORA. Excel Environmental, Inc. has been a Special Waste Hauler in the State of Illinois since 1974 (Ill EPA # 0164). Excel has always issued a Waste Stream Receipt with every pickup of used oil. Each generator is listed on a Daily Route Sheet. Every generator and every gallon secured is tracked with a clear paperwork trail to industrial boiler incineration. Excel also utilizes an independent EPA approved lab to insure that adherence to EPA regulations on used oil is certified.

Excel respects and operates with full intentions of total environmental compliance. Given the above facts Excel, a member of NORA for the past 15 years, respectfully requests and endorses NORA's current rule proposal presently before the Illinois Pollution Control Board and the IEPA. In addition, we request 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 regulation, 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.

Thank you for your time.

Best Regards,

Ken Petruck
VP Operations