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STATE OF ILLINOIS
Pollution Control Board

PCIBS

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

**Re: R 06-020, Proposed Amendments to the Board's Special Waste Regulations
Concerning Used Oil, 35 Ill. Adm. Code 808,809**

Dear Illinois Pollution Control Board Members,

The Chemical Industry Council of Illinois ("CICI") would like to register its voice in support of NORA, an Association of Responsible Recyclers. CICI is a statewide trade association representing the chemical industry in Illinois. CICI has 198 member companies employing over 49,000 workers in 726 manufacturing facilities and 877 wholesale and distribution facilities in Illinois.

The Illinois EPA's Used Oil Manifesting Program is a burden to the generators, transporters, transfer facilities and processors in our industry. NORA is asking for relief of the unreasonable and expensive regulatory burden of additional documentation and special facility permitting that is already addressed by the Federal Regulatory System.

None of the states bordering Illinois requires manifesting for used oil shipments or special permitting for used oil mixtures such as used oil and water, and they do not deal with this odd, expensive and confusing system. There is no logical reason why materials otherwise regulated as used oil (e.g. oily water) should not be handled as used oil. The IEPA language discourages recyclers from basing their business in Illinois.

CICI believes that the current proposal by NORA will improve the used oil recycling system in Illinois by dispensing with the manifest for used oil and materials regulated as used oil. All of the information that IEPA might need will be put on a bill of lading or other tracking document. There is no need for duplicative paperwork. The federal used oil regulations do not require a manifest and neither do any of the states that border Illinois. There is absolutely no environmental benefit from the manifest. It's an expensive waste of paper that imposes an unfair burden on Illinois used oil generators and transporters.

It is therefore that CICI supports the NORA's petition designated R06-020.

Respectfully submitted,



Lisa Frede
Director of Regulatory Affairs
Chemical Industry Council of Illinois

Headquarters

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