



Illinois Manufacturers' Association

September 17, 2008

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

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CLERK'S OFFICE
SEP 26 2008
STATE OF ILLINOIS
Pollution Control Board
PC 46

RE: Rule 2006-20. Proposed amendments to the Board's Special Waste Regulations concerning Used Oil, 35 Ill. Adm. Code 808, 809

Dear Ms. Gunn:

On behalf of the Illinois Manufacturers' Association (IMA) and our thousands of member companies across the state, I would like to join the National Oil Recyclers Association (NORA) and respectfully express our support of the proposed rule governing used oil.

As with many regulations, the IMA believes that our member companies would benefit from an Illinois regulation that mirrors current federal regulations and the United States Environmental Protection Agency. The uniformity will make it easier for manufacturing companies to comprehend and follow the regulations leading to efficiencies and increased compliance.

We support NORA's proposal to exclude from the Illinois Special Waste regulations all materials subject to federal regulation. This component will simplify the paperwork system without jeopardizing either human health or the environment. Illinois would also join all of our neighboring states who have replaced complex and burdensome regulations and manifests with the new system.

Quiet simply, Illinois' current Oil Manifesting Program is antiquated and lacks efficiencies that increases the cost for Illinois businesses and imposes unfair requirements that make it more difficult for our companies to operate.

In closing, I again ask for your support of these common-sense reforms that will protect the environment and help Illinois-based companies.

Regards,

Mark Denzler
Vice President – Government Affairs