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**STATE OF ILLINOIS  
Pollution Control Board**

September 30, 2009

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

*PC#85*

ORIGINAL

**Re: R06-020, Proposed Amendments to the Board's Special Waste Regulations  
Concerning Used Oil, 35 Ill. Adm. Code 739, 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, National Oil Recyclers Association. CICI is a statewide trade association representing the chemical industry in Illinois. CICI has 200 member companies employing over 49,000 workers in 726 manufacturing facilities and 877 wholesale and distribution facilities in Illinois.

CICI would like to thank the Board for its careful consideration in regard to this proposed rule to improve used oil regulations in the state of Illinois. Eliminating the requirement for unnecessary and duplicative manifests will reduce paperwork and costs. This is especially important for small businesses. Under the Board's proposed amendments the tracking of used oil shipments will continue, but will be much more efficient and cost-effective for facilities.

The proposed amendments will help level the playing field for Illinois based businesses by reducing the burden. These burdens are not imposed on businesses in other states.

It is therefore that CICI urges the Board to adopt its proposed amendments without any changes.

Respectfully submitted,



Lisa Frede  
Director of Regulatory Affairs  
Chemical Industry Council of Illinois

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