



ILLINI
Environmental, Inc.

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CLERK'S OFFICE

MAY 31 2019

STATE OF ILLINOIS
Pollution Control Board

May, 22nd 2019

Don A. Brown, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph St.
Chicago, IL 60601

**Re: Amendments to Manifesting Requirements: Special Waste Hauling 35 ILL ADM. Code 809,
Rulemaking R19-18**

Illini Environmental is an industrial waste management and recycling company. Illini is privately owned and operated since 2002, and is in Caseyville, Illinois, servicing the Midwest. We are an EPA non – hazardous permitted facility. We also are a permitted waste hauler of both hazardous and non-hazardous special wastes.

The adoption of the USEPA's E-Manifest Act has not only impacted us financially from the fees but has also increased our administrative burden as well. We agree with the Agency's statement in their filing for this rulemaking that identifies the fees that are to be paid to USEPA for each manifest, ranging from \$5 to \$15. This fee as you are aware is to be paid by the disposal facility. As most disposal facilities do, we also pass this fee onto our customers in order to recoup fees and administrative costs. Generators of non-hazardous special waste are seeing an increase in hauling and disposal fees. With our facility being on the Missouri border we often compete with Missouri Facilities that do not have this requirement put on them. This puts us at a disadvantage to compete and have lost business as a result of this.

We appreciate and support the effort with this proposed rulemaking to remove these burdens for non-hazardous special wastes.

If there is any other way, we can assist in this effort please let me know.

Sincerely,

Matt Nelson
Director of Operations
Illini Environmental Inc.