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Environmental Quality Board
15th Floor, Rachel Carson State Office Building
Harrisburg, PA 17105

Dear Sir or Madam:

The following comments are submitted on behalf of the Used Oil Management Association (UOMA). UOMA represents manufacturers and associated distributors and equipment suppliers of used-oil-fired heaters.

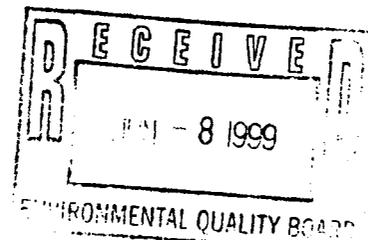
UOMA generally endorses the Department of Environmental Protection's efforts to conform its regulation of used oil to the United States Environmental Protection Agency's regulations and to simplify and make more user friendly the state's regulations governing used oil. As it relates specifically to UOMA, we applaud DEP's retention of the "space heater exemption," which permits the burning of off-specification used oil in heaters so long as the heater is vented to the ambient air, the heater has a maximum design capacity of .5 million Btus per hour, and the heater burns only used oil generated by the heater's owner/operator or by do-it-yourself oil changers (proposed §298.23). As you may be aware, states which have recently studied this issue, such as Vermont, Texas and New Jersey, have found that the use of used-oil-fired heaters is an environmentally sound, economically beneficial practice that greatly assists small businesses.

However, we are concerned about one facet of the proposed regulations. While we appreciate that the proposed regulations use the term "waste oil" because of the Pennsylvania Used Oil Recycling Act's specific definition of "used oil," and that the definition of "waste oil" in the proposed regulations in fact corresponds to the definition of "used oil" contained in EPA's regulations, we fear that the term "waste oil" has negative connotations that will have the effect of discouraging recycling efforts. We therefore suggest utilization of a new term in the proposed regulations, such as "managed used oil" or "recycled used oil." This would alleviate any confusion with the statutory definition of "used oil."

We appreciate the State of Pennsylvania's efforts to promote the recycling of used oil, and we appreciate the opportunity to comment on DEP's proposed regulations.

Respectfully yours,


JOE CONTI
State Senator



Senate of Pennsylvania

June 7, 1999

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