NORA Board Votes to Sue EPA: Doug Green and Venable Law Firm Retained

by Chris Harris, NORA’s General Counsel

On April 28, 2011, NORA’s Board of Directors made the decision to sue EPA over the Agency’s decision to classify off-specification used oil fuel as a “solid waste fuel.” The lawsuit will be filed in the United States Court of Appeals for the District of Columbia. The D.C. Circuit has primary jurisdiction for virtually all challenges to regulations issued by federal agencies. Under EPA’s regulation off-spec used oil fuel can only be burned in facilities with section 129 permits and space heaters that operated in compliance with Part 279 regulations.

The Board, following the unanimous recommendation of NORA’s Executive Committee, also decided to become an intervenor in the litigation if on-spec used oil is targeted by the Sierra Club (or some other entity). NORA and other parties would need to file their “petition for review”(setting forth the issues to be raised) by June 20, 2011. If the Sierra Club or some other entity targets on-spec used oil, NORA would need to file as an intervenor within 30 days.

There are major issues for NORA in the litigation against EPA with respect to off-spec used oil. NORA will challenge EPA’s determination that off-spec used oil is “discarded” and that it does not meet the Agency’s “legitimacy standard.” NORA will also assert that classifying off-spec used oil as a “solid waste” will contradict Congressional intent when it enacted legislation in the 1980s including the Used Oil Recycling Act and the 1984 RCRA Amendments.

NORA has also questioned whether the rule can be implemented in light of the fact that there are relatively few facilities with section 129 permits. According to NORA’s August 3, 2010 comments on the proposed rule, EPA has designated a tremendous quantity of material as solid waste fuel but seems to be clueless on the issue of whether there is sufficient burning capacity to manage this material. EPA has acknowledged that as a result of much more stringent standards governing section 129 facilities, many companies will relinquish these permits rather than incur the major costs of coming into compliance with the new requirements. NORA estimates that fewer than 50 facilities will be available for burning solid waste fuels.

The Board also voted to retain the Venable law Firm, based in Washington, D.C. to represent NORA in the litigation. Douglas H. Green will be the partner responsible for handling the litigation and will work closely with NORA General Counsel Christopher Harris. Doug Green complimented NORA on its persuasive and comprehensive comments and stated that they will serve as a strong foundation for NORA’s legal arguments during the litigation.

Mr. Green is lead counsel for the Utility Solid Waste Activities Group (“USWAG”), an association consisting of more than 110 energy industry operating companies and trade associations including the Edison Electric Institute, the National Rural Electric Cooperative Association, and the American Public Power Association. USWAG’s members service more than 95 percent of the Nation’s consumers of electricity. Mr. Green has represented USWAG for more than 25 years on solid and hazardous waste and chemical compliance, reporting and enforcement issues arising under the full spectrum of federal and many state environmental laws. USWAG will also challenge EPA’s solid waste fuel rule and will support NORA’s position on used oil.
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NORA was formed in 1984 by a group of companies that wanted to defend their ability to responsibly collect, process and market used oil. At that time, EPA was attempting to classify used oil as a hazardous waste which would have been detrimental to beneficial reuse of a valuable commodity.

NORA was successful and worked with the EPA to develop the Used Oil Management Standards. For the last 25 years, the industry has responsibly collected hundreds of millions of gallons which have been beneficially reused as re-refined lubricant, recycled fuel oil, or other related products.

Today, the members of NORA face a new threat from the recent decision by the EPA to classify off-specification used oil fuel as a “solid waste fuel” (see page 1). Additionally, NORA and its members are concerned about EPA being challenged by Sierra Club or related groups regarding new restrictions on on-specification used oil.

Just as NORA did in 1984, the association is challenging the EPA on their misguided rule. A guiding principle of NORA is to promote and defend all responsible markets for used oil. The new EPA rule will restrict responsible markets for used oil.

As noted on page 1, the NORA Board of Directors has decided to sue EPA regarding the solid waste rule. When challenging a Federal agency, it is imperative that a top law firm be retained. NORA has done that by retaining the Venable Law firm.

The anticipated budget required to properly fund this important challenge is $150,000. NORA’s membership dues have not increased in over 10 years and the NORA annual budget does not support this type of project.

NORA needs your help. The association is asking all members to participate in our effort to fully fund this legal challenge. A defense fund contribution request has been sent to all members.

If you have not already supported this effort, please consider doing so today. NORA can only fully defend all responsible markets for used oil if the membership supports this effort.

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EPA Solid Waste Rule: On-Spec Used Oil Also Vulnerable
Enviro Groups Likely to Sue

Although EPA’s Solid Waste Fuel Rule would classify on-specification used oil as a “traditional fuel” potential litigation by the Sierra Club, EarthJustice or other environmental groups could result in a reversal of EPA’s decision. If designated as a solid waste fuel, on-spec used oil could only be burned in facilities with section 129 Clean Air Act permits.

The Sierra Club had sufficient influence on EPA that its “Alternative Proposal” was published in the Federal Register in June 2010. The “Alternative Proposal” would classify both on-spec as well as off-spec used oil as solid waste-derived fuels that would have to be incinerated in facilities with section 129 permits. Space heaters, under Sierra Club’s proposal, could not burn either on-spec or off-spec used oil.

NORA’s Board of Directors has voted to intervene if any entity sues EPA in an attempt to overturn EPA’s decision not to designate on-spec used oil as a solid waste. NORA’s General Counsel, Christopher Harris, emphasized to the Board that NORA cannot depend on the Agency adequately defending its own decision concerning on-spec used oil. “NORA and its members have much greater knowledge about used oil than EPA and a much greater interest in protecting market-based incentives for recycling” said Harris.

The deadline for filing petitions for review with the D.C. Circuit Court of Appeals is June 20, 2011. NORA will file its petition prior to that deadline and will learn at that time whether the Sierra Club or another entity will attempt to designate on-spec used oil as a solid waste.

NORA and a Coalition of Associations
Request Immediate Stay of EPA Solid Waste Rule


The coalition provided a 38 page justification for the request. It noted that EPA has the authority to issue a stay and that EPA should stay the effective date of the NHSM Rule as it decides what steps it will take to ensure that the final rule does not classify more material as wastes than EPA intended.

NORA and the coalition contended that the uncertainty surrounding the rule justified the request for the stay.

Members of the coalition that participated in the stay request include:

- American Forest & Paper Association
- American Chemistry Council
- American Foundry Society
- American Home Furnishings Alliance
- American Petroleum Institute
- American Wood Council
- Biomass Power Association
- National Association of Manufacturers
- NORA, An Association of Responsible Recyclers
- Rubber Manufacturers Association
- Treated Wood Council

NORA has been meeting regularly with a coalition of associations that share the same concerns about the NHSM rule and how it will negatively impact their members. The group will continue to meet and coordinate.

At this point, EPA has not agreed to issue the requested stay.
NORA Achieves Final Victory in Lengthy Effort to Eliminate Used Oil Manifest in Illinois

On November 12, 2010, after more than four years of highly contentious rulemaking, the Illinois Secretary of State published a final rule promulgated by the Illinois Pollution Control Board that eliminates the requirement of a manifest for used oil and most materials regulated as used oil. NORA had formally proposed dispensing with the manifest in early 2006. The Illinois Environmental Protection Agency (“IEPA”) had vigorously opposed NORA’s petition and had obtained a letter from an EPA Region V official, Sue Brauer, in support of IEPA’s position.

NORA’s proposal, adopted as a final rule, allows a generator to use a bill of lading or other shipping document instead of a manifest. The shipping document must contain all of the information that would be included in a manifest. NORA’s principal argument during the lengthy debate on the merits of NORA’s proposal was that duplicative paperwork caused unnecessary expense. NORA also pointed out that none of the states surrounding Illinois imposed a manifest requirement. Therefore, eliminating the manifest requirement leveled the playing field for used oil generators and transporters in Illinois.

Vickie Custer, an owner of Southwest Oil Company and a member of NORA’s Board of Directors, chaired the working group that financed and pursued this effort. NORA’s General Counsel, Christopher Harris, handled the extensive legal work for the rule-making.

NORA has launched a Group on LinkedIn that is exclusively available to current members of NORA.

LinkedIn operates the world’s largest professional network on the Internet with more than 100 million members in over 200 countries and territories. Many NORA members are using LinkedIn to connect and network with peers in the industry.

By joining the NORA group on LinkedIn, members will have the NORA logo on their profile page. Also, they will be able to view all the other members of the NORA group and invite them to become a “connection”. By inviting members from the NORA group, you will know that the individuals are connected to companies that are members of NORA.

The NORA group section, only available to members, also features a discussion area, promotions area, and a job board.

How to join the NORA Group on LinkedIn?
If you are not already a member of LinkedIn, go to www.linkedin.com and join. It is free. After your account is set up, use the search box to search for the group NORA. Click on “Join Group”. Once the association confirms you are a member of NORA, you will be included in the group.
Keynote: Pat Buchanan, three-time candidate for President of the United States and national political commentators provided the Keynote address at the 2010 NORA Conference in Arizona. His presentation was titled, “A Conservative View from Washington” and was made right after the 2010 election when Republicans took control of the U.S. House of Representative and picked up many seats in the Senate. Buchanan also taped a public service announcement to promote responsible used oil recycling. The video will be available as a member-only service in 2011.

Standing Ovation: Following Pat’s Keynote Address and thorough question and answer session, the NORA audience thanked the speaker for his insight into how the 2010 election will shape Washington, DC over the next two years.

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ThermoFluids Hosts Plant Tour for NORA Membership

NORA Member Thermo Fluids, Inc., showcased their new recycling technologies to industry peers while hosting a tour for NORA members during the association’s annual national conference in late 2010.

More than 50 NORA members attended the Thermo Fluids tour, which walked industry leaders and executives from the U.S. and international community through the processes behind the company’s used oil recycling process, used antifreeze recycling facilities and used oil filter recycling and oil recovery operation.

“We’re proud to showcase our facilities to our industry peers, colleagues and fellow environmental stakeholders,” said James Devlin, Thermo Fluids’ chief executive officer. “This conference was a fantastic opportunity to feature our technologies at the national and international level.”

The tour was part of the 2010 NORA Annual Recycling Conference & Trade Show, which took place in November 2010 in Scottsdale.

The Phoenix plant’s used oil filter recycling operation was the highlight of the tour, and NORA members were given an inside look at how the process works.

First, oil is drained out of used oil filters for recycling. After removing as much oil as possible, the filters are crushed into cubes. The cubes are then thermally treated at approximately 1,500 degrees Fahrenheit for 24 hours, removing all prohibited materials. The process produces premium quality recycled oil and high grade scrap steel, which is sold to a local manufacturer in the Phoenix area.

For these and other technologies, Thermo Fluids was recognized with an award of merit in the 30th annual Valley Forward Environmental Excellence Awards — Arizona’s oldest and largest environmental competition.

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2011 NORA Winter Meeting Attracts 140 Members to Texas

The NORA Winter Meeting was held March 2-4, 2011 in Austin, Texas. Over 140 industry leaders from the liquid recycling industry came together from across the country to discuss regulatory and business issues.

Members heard reports and provided feedback regarding the EPA Solid Waste Rule, the California Used Oil Life Cycle Analysis and many other issues.

NORA thanks the sponsors for the 2011 NORA Winter Meeting:

Transfer of Power (l to r): Roger Wilson, Holston Environmental as well as NORA’s 2010 President passes the gavel to Chris Ricci, Ricky’s Oil who will serve as NORA President in 2011.

NORA relies upon elected volunteers to serve on its Board of Directors and Executive Committee. This group provides the direction to grow the organization, maximize member values and address government affairs issues.

The election for the 2011 NORA Board of Directors and Executive committee was held in October, 2010 with a large number of qualified candidates. The 2011 NORA Board of Directors and Executive Committee were installed at the 2010 Conference.

Election Results:

Elected to the Executive Committee
Bill Hinton, United Solutions Inc.

Re-elected to the Board
Jim Tefft, Crystal Flash Energy

Elected to the Board
Steve Anacker, Construction Resource Mgmt. (associate seat)
Steve Anacker, Construction Resource Mgmt. (associate seat)
Greg Ray, Heritage Crystal Clean

Leaving the Board - NORA thanks these individuals for their years of service.
Dan Cowart, Aaron Oil Company Inc.
Jim Letteney, Clean Harbors Environmental Services
Mike Mosura, Safety-Kleen

2011 NORA Leadership

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Valvoline introduces NextGen, a “50% Recycled Oil” product, with a major advertising push

Valvoline is throwing almost all of its marketing budget this year behind a completely new kind of product for the motor oil segment: 50% recycled motor oil. The company says the new product, called NextGen, is of high a quality as Valvoline’s other products, and that will be a big part of the message. Thom Smith, VP of branded lubricant technology at the Lexington, Ky.-based company, explains that new technology made the venture possible.

About 85% of motor oil is base oil, with the remaining 15% performance additives. “As the oil ages, contaminants can build up, but the oil itself -- the molecules -- are in good shape when you drain it. What we are able to do now is take used oil, remove the contamination, remove the additives and refresh it. In the past the processes for re-refining weren’t of the quality to make a quality base oil. Recently, innovations in re-refining use the same process as virgin re-refining, so we are able to take that base oil and produce finished oils that are as good as virgin.”

The other piece, he adds, is that the public had to be ready for this. “In the past, the public wasn’t willing to accept re-refined oil; there was reluctance to buy such products. But crude oil is finite, so it only makes sense to make the best possible use of it. Also the production of re-refined is much better for the environment than production of virgin oil, so production of NextGen also means a smaller environmental footprint.”

Blair Boggs, VP of global brands, says marketing activity around the new product, which hits retail next month (he says it will be in 75% of oil change centers by May and the rest through the summer) will include TV, print, radio, digital, grassroots efforts and a new program called MORE (Motor Oil Recycling Education). He adds that consumers in the U.S. go through about 800 million gallons of motor oil every year. “The key message,” he says, “is that NextGen is not just a product but one that closes the recycling loop, because most people actually recycle motor oil already.”

Boggs adds that a critical element of the new marketing strategy is pricing: unlike many “green” products, there will not be a price premium on NextGen. “Our challenge is to drive consumer acceptance of recycled motor oil,” he says. “To do that, first, we had to make sure consumers don’t have to pay more for the privilege. Second, we could not ask them to make a performance tradeoff.”

The MORE educational program is designed to encourage consumers not only to recycle, but also to close the loop by using recycled products, says Boggs. “We will be asking them to begin recycling, and to pledge to use recycled oils.” He says that for every consumer who takes the pledge, the company will donate a dollar to “Keep America Beautiful,” and “The Great American Cleanup.”

“From a marketing budget standpoint, Valvoline is all in supporting this,” says Boggs. “It’s what we are going to be talking about this year; we will advertise across traditional, interactive, social media, and activate with NASCAR teams with paint schemes, the use of product on race day and qualifying days. We are spending everything we’ve got against it.”


OSHA is proposing to modify the current Hazard Communication (Hazcom) Standard (29 CFR 1910.1200) in order to more closely align with the provisions of the internationally accepted Globally Harmonized System of Classification and Labeling of Chemicals (GHS) endorsed by the United Nations in July 2003.

Adopting GHS has required OSHA to propose several changes to the existing Hazcom Standard. It is anticipated that switching to the GHS will result in better quality and consistency of health and safety information being disseminated to workers, their employers, and ultimately the end users of chemical products that contain hazardous ingredients.

This new OSHA proposal will not affect all NORA members, but many members will be affected by it. XL Insurance has produced a three-page technical brief on the OSHA proposal and has made it available to all NORA members.

If you would like a copy of the technical brief, contact Matt Gartner at XL Insurance: 800-327-1414 or at matthew.gartner@xlgroup.com
**Industry News**

**ThermoEnergy Introduces Aircraft Deicing Fluid (ADF) Recovery System to Help Airports Meet Proposed EPA Regulations**

NORA Member ThermoEnergy Corporation has introduced a new, sustainable aircraft deicing fluid recovery system for the recovery of glycol and glycerin based aircraft deicing fluids. The CASTion ADF Recovery System™ is based on ThermoEnergy’s proprietary CAST™ (Flash Vacuum Distillation) physical-chemical process that uses temperature and reduced pressure to first separate water from the ADF and second separate the glycol and glycerin from their additive package. The process combines CAST technology with pre-treatment to obtain a ADF recovery rate of 95% with 99% purity. The system may be combined with other technologies such as RO depending on the characteristics of the spent ADF storm water characteristics.

According to the company, ThermoEnergy's CASTion ADF Recovery system is the most cost-effective technology available to meet the proposed final EPA regulations for ADF in aircraft deicing operations — with a typical payback of less than two years. The system is reported to have a number of competitive advantages over existing systems, including: a small footprint, less energy usage, significantly less greenhouse gas emissions, and the concentration of glycols and glycerin for higher resale value.

Airports or airlines are invited to test ThermoEnergy’s ADF Recovery System on-site, using ThermoEnergy’s mobile system. Call David Delasanta at 508-854-1628 Ext 305 or email ddelasanta@thermoenergy.com.

**1099 Repeal Passed by Congress Signed into Law**

After multiple attempts, the House and Senate have passed a bill to repeal the Form 1099 reporting expansion so that the law will revert to the previous statute. The President has signed the law.

The form 1099 reporting requirement was put into place because of the 2010 Healthcare Law. The law would have required small businesses to file 1099s on all non-credit card purchases totaling $600 or more with any vendor in a tax year.

There was concern from NORA that this would have created a new onerous paperwork requirement for transactions for the acquisition of used oil.

**Safety-Kleen Breaks Ground on $26 million expansion of Breslau, Ontario, used oil re-refinery**

NORA Member Safety-Kleen broke ground on a $26 million expansion of its Breslau, Ontario, used oil re-refinery. The expansion will increase the facility’s processing capacity by 25 percent, from 152 million to 191 million liters of used oil annually.

This increase in re-refining capacity will allow the used oil generated by the equivalent of 130,000 engine oil changes a day to be re-refined back into high quality lubricating oils. The economic and environmental benefits of the re-refinery upgrade include:

“We’re glad to be part of growing Ontario’s green economy, and this investment expands our ability to re-refine lubricants made from non-renewable resources and recycle and re-use them as part of a comprehensive cradle-to-cradle environmental management system,” said Dale MacIntyre, vice president of Safety-Kleen Canadian Refinery Operations.

The Honourable John Wilkinson, Ontario Minister of Environment, attended today’s ground breaking ceremonies at Safety-Kleen’s Breslau facility.
Safety-Kleen Appoints Robert M. Craycraft as CEO

NORA Member Safety-Kleen Systems, Inc., announced the appointment of Robert “Bob” M. Craycraft II as its new President and Chief Executive Officer effective April 11, 2011. Craycraft is also expected to be elected to the company’s Board of Directors.

“Bob brings Safety-Kleen more than 20 years of experience developing successful growth strategies and driving profitability in the U.S and abroad,” said Ronald W. Haddock, chairman of the board of Safety-Kleen. “Importantly, Bob has years of direct experience in industries that are relevant to Safety-Kleen – environmental services, chemicals, and oil and lubricants, so we’re very excited about putting his extensive knowledge and experience to work for us.”

Craycraft, 41, has most recently been President of Ashland Distribution, a $3.7 billion division of Ashland, Inc., where he led the company’s chemicals, plastics, environmental services and composites businesses in North America, Europe and China.

“Under Bob’s leadership, Safety-Kleen will continue to target further growth as North America’s premier environmental services organization by leveraging our brand, products, services and exceptional talent to help our customers Make Green Work™ for their businesses,” Haddock said.

Universal Environmental Services & Avista Oil Enter Into Agreement: Plan 30 Million Gallon Re-refinery in Georgia

NORA Member Universal Environmental Services, LLC (UES) announced recently that it has entered into an agreement with a US subsidiary of AVISTA OIL AG (Avista) whereby Avista has acquired an equity interest in UES. “As one of the largest collectors and re-refiners of used oil in Europe, Avista will bring significant resources to Universal, enabling us to grow our used oil collection business and to establish a used oil re-refinery at our location in Peachtree City, Georgia. Current plans call for the construction of a 30 million gallon per year plant with the capacity to produce the highest quality base oils. Avista also brings significant “green” expertise to UES and will further UES’s Green Initiatives” said John Redmond, Universal’s President and Chief Executive Officer.

Andreas Weinberger, representing the owners of Avista, said “We are very pleased to have made this significant investment in UES as it furthers Avista’s objectives to become a world player in the used oil business by having a presence in the important and growing US market. Our objective is to grow the UES investment both internally as well as through strategic acquisitions.” Avista’s CEO Bernd Merle added “I am very excited about the opportunity to cooperate with one of the best used oil collectors in USA. The management of UES is doing an excellent job. I am very confident that UES’s used oil generators and PFO customers will benefit from our expertise and technological know-how.”

Enterprise Rent-A-Car Partners with Universal Lubricants

Rental car company Enterprise Holdings, which operates the Alamo Rent A Car, Enterprise Rent-A-Car and National Car Rental brands, has created a business alliance with Universal Lubricants to close the loop on recycling the company’s used motor oil.

Beginning at Enterprise’s airport service centers in five states, Universal Lubricants will collect the spent motor oil of Alamo, Enterprise and National vehicles and recycle it for use in ECO ULTRA brand motor oil. That motor oil will then circle back into Enterprise cars and light trucks in those markets, thereby closing the loop.
Industry News

Brown Gibbons Lang & Company Produce Report
Spotlighting Oil Collections & Re-refining

NORA member Brown Gibbons Lang & Company (BGL) recently published its Q1 2011 Environmental Services Insider featuring a spotlight on Oil Collections & Re-refining, an industry nearing an inflection point in terms of both growth and consolidation. The spotlight contains insights into market trends that are driving growth and the outlook on M&A and its future role in industry expansion, prepared from a survey of market participants, including oil recyclers and re-refiners, as well as private equity investors and lenders to the industry.

Growing environmental awareness, coupled with the rising cost of oil, have focused attention on all forms of responsible used oil recycling, underscoring its value in use for energy recovery and re-refining, setting the stage for increased private and public investment in the coming years. BGL’s findings revealed that current market dynamics underpin a healthy environment for increased investment activity as collectors look to build scale through acquisition and close the loop with re-refining integral to the collection and distribution strategy.

The BGL Environmental Services Insider is a quarterly newsletter addressing capital markets and mergers & acquisitions activity, financial and operating performance of certain publicly-traded companies, and trends and issues affecting the environmental services industry. Each Insider also provides an industry spotlight, presenting both BGL’s view and the view of the market, supported by opinions from leading executives and investors, for certain sectors of the environmental services industry.

National Geographic Produces Article about Re-refined Lubricants

On June 1, 2011, National Geographic published an article called, “Is Motor Oil a Renewable Resource? Re-refiners Say Yes”.

The article provides a basic look at the industry and features numerous NORA members in the piece.

To read the article, visit: http://news.nationalgeographic.com/news/energy/2011/06/110601-green-motor-oil-recycling/

California $6 Million Used Oil Life Cycle Analysis: NORA Actively Participating

Because of the passage of California Senate Bill 546, the state is organizing a $6 million Life Cycle Assessment project related to the used oil industry. NORA’s Scott Parker and Jack Waggener have attended three separate meetings this year in Sacramento to monitor the process and to promote views that maximize the collection of used oil.

The assessment project will be conducted primarily through the California university system. The state of California has decided that the life cycle assessment will focus on used oil generated in the state of California. Also, California has decided that the life cycle assessment will not consider removing the hazardous waste designation that is applied to used oil in California.

2011 NORA Conference to be in Hawaii: Hotel Block is Already 77% Sold

The 2011 NORA Annual Conference & Trade Show will be held November 9-12, 2011 at the Grand Wailea Resort in Maui.

The NORA hotel block (rooms start at $199/night) is already 77% sold. To reserve your room, call 800-888-6100 and use our group code GNORA. For detailed information, visit www.noranews.org/hawaii
Industry Calendar

NORA maintains relationships with related industry associations. Here is a list of industry events.

**NORA 2011 Mid-Year Meeting**
June 22-24, 2011, Minneapolis, Minnesota

**National Asphalt Pavement Association Mid-Year Meeting**
July 18-19, 2011, Lake Tahoe, Nevada
www.hotmix.org

**Automotive Oil Change Association Int’l. Fast Lube Expo**
August 9-12, 2011, Dallas, Texas
www.aoca.org

**Independent Lubricant Manufacturers Association Meeting**
October 15-18, 2011, Orlando, Florida
www.ilma.org

**Filter Manufacturers Council Meeting**
October 16-18, 2011, Houston, Texas
www.aftermarketsuppliers.org/Councils/Filter-Manufacturers-Council

**NORA 2011 Annual Recycling Conference & Trade Show**
November 9-12, 2011, Hawaii

**National Asphalt Pavement Association Annual Conference**
January 21-25, 2012, Desert Springs, California
www.hotmix.org

**National Automotive Dealers Association Conference**
February 3-6, 2012, Las Vegas, Nevada
www.nada.org

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NORA’s membership has grown to over 260 members. NORA relies heavily on word of mouth marketing. **Please refer NORA to your peers and suppliers.** 22 companies have joined NORA so far in the last few months.

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