

ILLINOIS POLLUTION CONTROL BOARD
June 7, 1973

OLIN CORPORATION)

v.)

PCB 73-82)

ENVIRONMENTAL PROTECTION AGENCY)


SUPPLEMENTAL STATEMENT (by Mr. Dumelle)

While I concurred in the 4-0 grant of this variance I wish to point out two points of consideration in future proceedings at this same plant.

First, it is my opinion that Olin did not carry its burden in proving it needed a variance for lead. The record shows that Olin's "analytical technique is such that we cannot reach down below three-tenths of a part per million" referring to heavy metals including lead (R.81). Yet the sensitivity for lead analyses is not 0.3 ppm but 0.05 ppm. Thus it is not clear why an industry in the chemical business could not measure its lead discharges to a finer degree. If interferences exist because of other heavy metals, then Olin should have gone to the exact procedure of neutron activation.


Also the lead data are as of January 1, 1972 or 16 months before the hearing was held. Olin should have made an up-to-date (and accurate) analysis for the instant proceeding.

Second, the "uncertain market" argument is one that any other industry can bring. A steel mill can talk of Japanese imports of steel and an automobile plant can point to the foreign car imports. So long as we have a competitive economy so the market uncertainty will exist. If we accept a market argument for Olin how do we not accept it for any other industry which is in competition? I would rather base the grant of this variance on the points that (1) the fluoride discharge presents no water quality problem after mixing and (2) progress toward abatement to State effluent standards is being made.



Jacob D. Dumelle, Board Member

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Supplemental Statement was submitted on the 12th of June, 1973.



Christan L. Moffett, Clerk
Illinois Pollution Control Board