

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

REASONABLY AVAILABLE CONTROL)
TECHNOLOGY (RACT) FOR VOLATILE) R2010-20
ORGANIC MATERIAL EMISSIONS FROM) (Rulemaking-Air)
GROUP IV CONSUMER & COMMERCIAL)
PRODUCTS: PROPOSED AMENDMENTS)
TO 35 ILL. ADM. CODE 211, 218 AND 219)

NOTICE

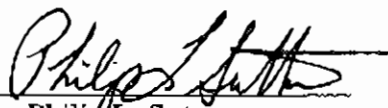
To: John Therriault, Assistant Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601-3218

SEE ATTACHED SERVICE LIST

Please take notice that I have today filed electronically with the Office of the Pollution Control Board the POST-HEARING COMMENTS OF OLIN CORPORATION, a copy of which is herewith served electronically upon you. If you would like a hard copy of such comments, please contact the undersigned and a hard copy will be sent to you.

Respectfully Submitted,

OLIN CORPORATION


By: Philip L. Sutton

Dated: June 3, 2010.

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POST-HEARING COMMENTS OF OLIN CORPORATION

Olin Corporation (Olin) would like to take this opportunity to follow up on its testimony prefiled on May 7, 2010 and supplemented at the hearing on May 19, 2010 with the Illinois Pollution Control Board (“IPCB”) concerning R10-20 (“Testimony”). Olin is submitting these comments in support of the Illinois Environmental Protection Agency’s (“Agency’s”) Motion to Amend Rulemaking Proposal filed May 17, 2010 (“May 17 Motion”) and to support an expected additional Motion by the Agency to further amend the rulemaking proposal.

Olin’s Testimony indicated that Olin had had very little time to evaluate the proposed rule and the potential for impacts on its operations but that it was concerned that the proposed limits, if applicable to its East Alton, Illinois, operations, could well be technically and/or economically infeasible for ammunition manufacture. In addition to other concerns, Olin discussed three changes that were proposed in R10-20 that could have a significant impact on Olin’s East Alton ammunition manufacturing operations. These three changes included the following:

- Addition of the new military specification coating category;
- Addition of the new all other coating category; and
- The short time frame to meet the new emission limitations.

Olin has been unable to locate any information that indicates that ammunition manufacture was considered when determining the limits proposed in R10-20 and the proposed categories will likely affect ammunition manufacturing in ways unanticipated by the Agency. Olin has discussed ammunition manufacturing with the Agency, and the Agency has proposed to the IPCB, or agreed to propose to the IPCB, feasible changes to the proposed rules to address ammunition manufacturing.

May 17 Motion

As a result of a question asked at the April 28, 2010 hearing for R10-20 concerning whether the definition of “military specification coating” included sealants used in ammunition manufacturing (Transcript of April 28, 2010 Hearing, page 29, line 8), on May 17, 2010 the Agency responded in its filed Post-Hearing Comments. In the Post-Hearing Comments – Item 4, page 1, the Agency said that:

The Agency does not intend “military specification coating” to include these sealants. Primer sealants used in ammunition manufacturing are currently regulated under Subpart TT of Parts 218 and 210, and the Agency intends that they continue to be regulated as such. Mouth waterproofing sealants and cap sealants used in ammunition manufacturing are currently regulated as clear coatings or extreme performance coatings under Section 218/219.201(j). In its Motion to Amend Rulemaking Proposal, the Agency has proposed a new coating category for these sealants under proposed Section 218/219.204(q)(1).

The Agency has indicated, therefore, that it is its intention that sealants used in ammunition manufacturing be subject to the current limits.

In the May 17 Motion, the Agency proposed new definitions in 35 *Ill. Adm. Code* Part 211 for Ammunition Sealant (§ 211.481), Cap Sealant (§ 211.880), Ejection Cartridge Sealant (§ 211.1872), Mouth Waterproofing Sealant (§ 211.3967), and Primer Sealant (§ 211.5075). The Agency also created a new emission limit category under 35 *Ill. Adm. Code* §§ 218/219.204(q)(1) for Ammunition Sealants. Olin supports the May 17 Motion. The changes

proposed conform the proposed rule to the Agency's intent that Cap Sealants and Mouth Waterproofing Sealants continue to be subject to their current limits.

Additional Changes Related to Primer Sealants and Ejection Cartridge Sealants

As indicated by Olin at the May 19, 2010 hearing for R10-20, the May 17 Motion addressed Olin's concerns related to the feasibility of limits for Cap Sealants and Mouth Waterproofing Sealants, but Olin still has concerns with the feasibility of the proposed limits as they may relate to Ejection Cartridge Sealants and Primer Sealants. Although in the May 17 Motion the Agency indicated its intent that Ejection Cartridge Sealants and Primer Sealants continue to be regulated under 35 Ill. Adm. Code Part 219, Subpart TT, without additional changes to the proposed rule, if Ejection Cartridge Sealants and Primer Sealants are classified as coatings they could be subject to either the "Military Specification Coating" limitation proposed for 35 Ill. Adm. Code §§ 218/219.204(q)(1)(L) or the "All Other Coatings" limitation proposed for 35 Ill. Adm. Code §§ 218/219.204(q)(1)(BB) (or (DD) in the May 17 Motion).

Following the May 19, 2010 hearing, Olin held additional discussions with the Agency regarding Ejection Cartridge Sealants and Primer Sealants. As a result, the Agency has agreed that it will propose the following additional changes to the proposed rule in R10-20 and the amendments proposed in the May 17 Motion:

Section 211.481 Ammunition Sealant

"Ammunition sealant" means, for purposes of 35 Ill. Adm. Code Parts 218.204(q)(1) and 219.204(q)(1), a coating applied in the manufacture of ammunition, including cap sealants and mouth waterproofing sealants. ~~Primer sealants and ejection cartridge sealants are not included within this category.~~

Section 211.1872 Ejection Cartridge Sealant

Ejection cartridge sealant means, for purposes of 35 Ill. Adm. Code Parts 218.204(q)(1) and 219.204(q)(1), a sealant applied during the assembly of an ejection cartridge to

provide a waterproof barrier between a shellcase and primer, and between a shellcase and the ~~nitrocellulose~~-wad.

Section 211.5075 Primer Sealant

Primer sealant means, for purposes of 35 Ill. Adm. Code Parts 218.204(q)(1) and 219.204(q)(4), a sealant applied in the manufacture of ammunition to assembled primers to maintain the primer assembly and prevent explosive priming mix from dusting during the transfer of primers.

Section 218/219.204 Emission Limitations

- q) Miscellaneous Metal Parts and Products Coatings and Plastic Parts and Products Coatings On and After May 1, 2011. On and after May 1, 2011, the owner or operator of a miscellaneous metal or plastic parts coating line shall comply with the limitations below. The limitations in this subsection (q) shall not apply to aerosol coating products, ~~or~~ powder coatings, or primer sealants and ejection cartridge sealants used in ammunition manufacturing. Primer sealants and ejection cartridge sealants shall instead be regulated under Subpart TT of this Part.

Olin supports the above additional changes, and if the Agency does not move the IPCB to include these changes, then Olin moves that the above changes be incorporated into the rulemaking. Incorporation of these changes into the proposed rules for R10-20 would resolve the potential issues Olin had with the Ejection Cartridge Sealants and Primer Sealants.

Additional Changes Related to Application Methods

Following the May 19, 2010 hearing on R10-20, Olin determined that the proposed new 35 Ill. Adm. Code §§ 218/219.219(b)(6) could also have a significant adverse impact on Olin's ammunition manufacturing operations, depending upon how the section is interpreted. This proposed section requires that all coatings be applied using one or more of the specified application methods. These specified application methods include:

- A) Electrostatic Spray;
- B) High volume low pressure (HVLP) spray;
- C) Flow Coating;
- D) Roll Coating;
- E) Dip Coating;

- F) Airless Spray;
- G) Air Assisted airless spray; or
- H) Another coating application method capable of achieving a transfer efficiency equal to or better than that achieved by HVLP spraying if such a method is approved in writing by the Agency.

The proposed 35 *Ill. Adm. Code* §§ 218/219.219 would apply to the application of the Cap Sealants and Mouth Waterproofing Sealants subject to the proposed 35 *Ill. Adm. Code* §§ 218/219.204(q).

The application of Cap Sealants and Mouth Waterproofing Sealants onto ammunition does not follow standard coating operations because the sealant is only applied to a very small, precise area of the ammunition. Historically at Olin, Cap Sealants and Mouth Waterproofing Sealants have been applied using a Capper machine that uses a wicking process. In this process, a pin or plunger is dipped in the sealant and is then moved close enough to the small precise part of the ammunition where the sealant then wicks onto the appropriate area. This process is similar in effect to the process described in the "Flow Coating" definition in the proposed rule, but the coating is not applied through or with a fluid nozzle. No air is supplied to aid the transfer of the sealant.

Conversion to Capper machines that apply the sealant through a nozzle to meet the "Flow Coating" definition would cost several hundred thousand dollars, but would provide no net environmental benefit. Olin believes that the historical process of applying the sealant by wicking is an efficient and effective method to transfer the sealant to the ammunition, without the addition of air or other gases. There would not be sufficient time, nor would it be economically reasonable, to convert all machines to meet the flow coating definition should the Agency not be able approve the wicking application method as an alternate application method per the proposed 35 *Ill. Adm. Code* §§ 218/219.219(b)(6)(H). Comparison of Olin's wicking

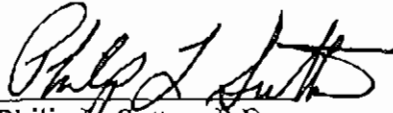
method to the transfer efficiency achieved by the HVLP spraying as specified under the proposed 35 *Ill. Adm. Code* §§ 218/219.219(b)(6)(H) would be difficult since the ammunition sealant is applied to only to a small specific area on the ammunition, which is very different from transferring the coating to a large surface area as in HVLP spraying. The wicking method is an efficient method to transfer the sealant to the ammunition in order to meet product specifications.

As a result of discussions with the Agency on Olin's use of a wicking process to apply sealants to ammunition, the Agency has agreed to and Olin supports the following addition to the proposed 35 *Ill. Adm. Code* §§ 218/219.219(c):

- 5) For Ammunition Sealant Operations: application of cap sealants and mouth waterproofing sealants.

Incorporation of this addition to the proposed 35 *Ill. Adm. Code* §§ 218/219.219(c) would assure Olin that it could continue to apply cap sealants and mouth waterproofing sealants under the same conditions that are currently regulated by its Title V Permit.

Olin appreciates the opportunity to comment on the proposed regulations and respectfully asks the IFCB to amend the proposed rule as discussed in the May 17 Motion and as discussed in these post-hearing comments.



Philip V. Sutton, P.E.
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Olin Corporation, Winchester Division

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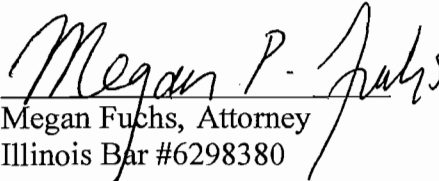
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CERTIFICATE OF SERVICE

I, the undersigned, an attorney, certify that I have served the attached Post-Hearing Comments of Olin Corporation on the date of June 3, 2010 upon the following persons by electronic mail:

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