

Mr. Brad Holloran
Illinois Pollution Control Board
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100 W. Randolph Street
Chicago, Illinois 60601

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MAR 24 2004

STATE OF ILLINOIS
Pollution Control Board

March 19, 2004

Subject: Permit (PCB 91-17) and AS 02-05)

PCB

Dear Mr. Holloran,

I am writing as a concerned citizen with regard to the Henry, IL Noveon, Inc Plant NPDES permit appeal and adjusted standard application. I have had the pleasure of working at the Noveon plant since October 1993, mostly in the Engineering department, but most recently as Operations Manager. The plant has a long history of safety excellence and community support. As a plant, we strongly believe and practice Responsible Care principals as part of the Chemical Industry. There are many good people at the plant working hard to keep the plant safe for all employees, for the community and for the environment. As an example, we are proud that we have recently passed a milestone of over 12 years without a lost time accident. This is a great accomplishment for any industry.

Our plant manufactures many useful products, including additives that make rubber cure faster, and antioxidants for rubber, plastic and petroleum products. We also make corrosion inhibitors, coatings for electronics, and most recently personal care products. It's great to be able to say that these useful products are still manufactured here in the United States. It's great that we still have the equipment assets here in America to safely produce these products. But our real assets at the Henry Plant are our people. That is why I feel compelled to write you this letter.

We at Henry share your concern for the environment. We have many outdoor enthusiasts, fishermen, and folks who want their children to enjoy the planet for countless generations to come. We have worked hard on Pollution Prevention initiatives to reduce lost materials to our wastewater treatment system. In 2003, we received an award from the Governor for Pollution Prevention. It was the third such award in recent years. We believe these efforts make more sense than costly end of pipe treatment systems.

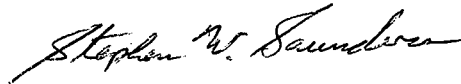
The quality of the water leaving our wastewater treatment system is monitored closely. I understand that because of a reversal in interpretation of regulations, we are being asked to meet a very stringent requirement on ppm ammonia. I further understand that to meet these requirements at our point of discharge would require millions and millions of dollars, both in term of capital and operating costs. Such a cost would likely make it impossible to compete in our industry, therefore probably causing a significant cutback of our greatest asset, our people. Will the river benefit? I understand, from the

many engineering studies done, that there would be little, if any benefit to the quality of the water in the river.

If the river does not benefit, then what is to be gained by imposing stiffer water quality regulations? The shutdown of yet another chemical plant in America? Could our products be made by foreign companies overseas? Perhaps -if we don't mind paying the import cost. Would these products be made in a safer or more environmentally friendly manner for the planet? I doubt it. But I wonder what would happen to the 75 people currently employed on the Noveon side of the Henry Plant. Will they be able to find comparable jobs elsewhere in the community?

Instead of imposing costly, end of pipe regulations on the Henry Plant, I would urge the government to work hand and hand with our industry to reduce pollution at the point of generation, as we have been doing with our Pollution Prevention program. I hope the great people of the Henry Plant have a chance to continue this effort and to continue to support the community.

Sincerely,

A handwritten signature in cursive script that reads "Stephen W. Saunders".

Stephen W. Saunders
630 Timber Ridge Road
Princeton, IL 61356