

April 4, 2023

Dear Administrator Regan:

As the largest global and US producer of chloralkali, and as the owner of the largest global and US asbestos-based diaphragm chloralkali capacity, Olin Corporation would support an EPA action to ban the installation of any new or replacement asbestos-based diaphragms in two years, in combination with an additional five years to operate any existing asbestos-based diaphragm production cells.

If the EPA were to adopt this plan, at the end of this seven-year period, no asbestos-based diaphragm cells would remain in any chloralkali industry facilities. During this additional five-year window to operate, we would use an in-situ process to maintain the diaphragms which does not involve workers removing asbestos diaphragms from the closed process for repairs or constructing new asbestos diaphragms. Additionally, no asbestos imports into the U.S. are required past today.

Sincerely,

Scott Sutton

Chairman, President, CEO

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