



**Branson Ultrasonics
Corporation**
41 Eagle Rd.
Danbury, CT 06810

T (203) 796 0400
F (203) 796 2285

April 29, 2011

Alex Ryan-Bond
Environmental Associate
Ozone Transport Commission
444 N. Capitol Street NW, Suite 638
New Castle, DE 19720

Dear Mr. Ryan-Bond,

Thank you for the opportunity to respond to the proposed changes to OTC Model Rule for Solvent Cleaning. We enjoyed meeting you at the March meeting in Maryland and we look forward to continuing to work with the OTC regarding the OTC Model Rule for Solvent Cleaning.

Branson Ultrasonics was established in 1946 to harness ultrasonic energy for industrial purposes. Branson Cleaning Equipment Company was formed in 1953 to develop ultrasonic cleaning equipment for emerging industrial technologies. Branson is an industry leader in the development, manufacture, and marketing of precision cleaning equipment, both Ultrasonic Vapor Degreasing Precision Cleaning Equipment and also Ultrasonic Aqueous Precision Cleaning Equipment. We are committed to providing the best solutions to the precision cleaning needs of our customers and are not biased as to the solution being used. We work closely with our customers to find the best, safest, most cost effective solution to their specific precision cleaning needs and challenges. Branson Ultrasonics has thousands of customers worldwide. Branson is a truly global company with more than 1,800 employees and 70 sales and service offices throughout the world. Since 1984 Branson has been among the more than 60 autonomous divisions of St. Louis-based Emerson, a Fortune 150 company. Our worldwide headquarters are in Danbury Connecticut, and we have a very strong presence at companies in states that would be affected by the OTC Model Rule for Solvent Cleaning.

Branson strongly objects to the proposed rules as written and would like to see the proposed rules changed/modified with the input from experienced vapor degreaser manufacturers, solvent suppliers, and customers in the manufacturing industry. The proposed rules as written would have a devastating affect upon many manufacturers that service many different industries. Our customers serve the medical, electronics, optics, defense, aerospace, and precision machining industries, to mention a few. Either manufacturing of critical components in these industries will cease or be moved elsewhere. As stated in other responses to the OTC Model Rule our customers have one very challenging and common requirement, they must precision clean their components.

Today's manufacturers use vapor degreasing solvents, not because they are cleaners of choice, but because they are cleaners of necessity. The existing restrictive regulations in place and high cost of alternative vapor degreasing solvents have already forced most solvent users to switch to alternative

processes where those alternatives are practical. Since Branson provides both aqueous and non-aqueous alternatives we have worked very closely with our customers to provide the best cleaning solution and process. If the parts can be cleaned effectively with water based solutions, that is the equipment and process solution we provide. The fact is that in many instances solvent cleaning is the only method that will achieve the required cleanliness without the poor results and performance problems inherent with other technologies. We would be happy to go into detail with the OTC on particular applications and industries that require vapor degreasing as the only viable alternative.

Ralph Greco of Greco Brothers Incorporated provided a very good overview and recent history of vapor degreasing. Also, his comparison of open top processes as compared to airless degreaser units was absolutely on target. I would refer you to Mr. Greco's comments of Feb 16, 2011.

Given that vapor degreasing processes using solvents are necessary, restricting their use to airless degreasers ignores the realities of manufacturing in the worldwide economy. Manufacturers are faced with limited options. If possible they can use airless degreasers, pass the additional costs on to their customers and suffer the consequences of lost sales due to competition from places having less restrictive regulations. The additional costs are incurred because airless degreasers are significantly more expensive to purchase than open top degreasers and have much lower throughput capacity, sometimes requiring multiple units to handle the workload of a single open top degreaser. Also, many applications will just not make sense because of part size or throughput requirements. This makes airless units not a viable option for many, many manufacturers.

The second option is to move manufacturing to less restrictive areas. We need to slow the manufacturing exodus, not accelerate it.

The third option is to stop manufacturing the product.

Using the California model will result in the loss of jobs, manufacturing revenue and tax base in the same manner as it is affecting the California economy. The rule's impact on the Northeast and Mid Atlantic economies must be considered. An economic impact study is recommended.

The OTC Model Rule for Solvent Cleaning as written will basically eliminate the use of open top vapor degreasing equipment. It is understandable to eliminate/restrict the use of obsolete older open top vapor degreasing equipment that is not efficient and has high solvent usage. These older units do not have the superior solvent containment design and features of equipment presently being built by Branson Ultrasonics. The incorporation of very efficient primary condensing coils, sub zero freeboard chillers, internal water separators, power covers, and full parts processing automation has reduced solvent usage very significantly. In using Branson fully automated B series Ultrasonic Vapor Degreasers customers have experienced a safe working environment and have significantly reduced the amount of solvent consumed as compared to using older degreasing equipment or cold cleaning.

Ozone Transport Commission
Page 3
April 29, 2011

We highly recommend incorporating verbiage to require modern solvent control technology for open top vapor degreasers in the model rule. We feel this will accomplish what you are tasked to do, reduce VOC emissions.

Branson offers to participate in workshops or review sessions to help draft rules that will accomplish VOC reductions without crippling our customers' ability to compete in the global marketplace. We have considerable experience in controlling solvent losses and feel that we could make significant contributions as part of a directed team.

Please do not hesitate to contact us with any questions or concerns.

Sincerely,

Branson Ultrasonics Corp.

Ronald Baldwin
Cleaning Engineering Manager
Branson Ultrasonics Corp.
Phone 203-796-0471
ron.baldwin@emerson.com

Philip Brockelman
Regional Manager
Branson Ultrasonics Corp.
Phone 207-363-8186
phil.brockelman@emerson.com

Edward Lamm
District Manager
Branson Ultrasonics Corp.
Phone 203-796-0392
edward.lamm@emerson.com