



Office of the Secretary

UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

April 6, 2011

Mark B. Koogler, Esq.  
Porter Wright Morris & Arthur LLP  
41 South High Street  
Suites 2800 - 3200  
Columbus, OH 43215-6194

Re: Olin Corporation/BleachTech LLC, *et al.*, FTC File No. 111-0042

Dear Mr. Koogler:

The Federal Trade Commission's Bureau of Competition has conducted a nonpublic investigation to determine whether Olin Corporation's proposed acquisition of BleachTech LLC, LDJ Seville LLC, LDJ Petersburg LLC, and LDJ Peru LLC from Richard L. Immerman may have violated Section 7 of the Clayton Act or Section 5 of the Federal Trade Commission Act.

Upon further review of this matter, it now appears that no additional action is warranted by the Commission at this time. Accordingly, the investigation has been closed. This action is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require.

By direction of the Commission.

Donald S. Clark  
Secretary