TRC
Customer-Focused Solutions

August 2, 2006

Mr. Michael Laurent
Environmental Manager
Omya, Inc., Verpol Plant
Whipple Hollow Road
Florence, Vermont 05744

Re: Omya Inc. East Plant - *Hazardous Most Stringent Emission Rate* (HMSER)
TRC Project 45532

Dear Mr. Laurent:

This letter is in conjunction with my previous letter regarding an evaluation of potential emission control strategies dated June 30, 2006 for reducing/abating odors from Omya's East plant flash dryers. While TRC's evaluation was conducted as part of its study regarding odor episodes associated with the dryers, the findings also apply equally toward the determination of the Hazardous Most Stringent Emission Rate (HMSER) for the organic compounds detected during the related stack testing, attributed to the decomposition of stearic acid, and associated with the odors.

At this time TRC would like to supplement its initial evaluation with additional information to complete an HMSER analysis for the organic compounds. A search for other potential organic emission control technologies was conducted using the U.S. Environmental Protection Agency's RACT/BACT/LAER Clearinghouse (RBLC). The following seven different categories of process types were searched, with each category containing 9 individual searches as further described below, for a total of 63 searches.

1. 90.017 – calciners & dryers and mineral processing facilities
2. 90.019 – lime/limestone handling/kilns/storage/manufacturing
3. 90.024 – non-metallic mineral processing (except 90.011, 90.019, 90.017, 90.026)
4. 90.999 – other mineral processing sources
5. 99.000 – miscellaneous sources
6. 99.999 – other miscellaneous sources
7. (no code number) -- all process types

For each of the seven process type categories, searches were conducted for the "pollutant name" of "VOC", "organics", and "odor", for each of three "process name contains" variables -- "stearic" (for stearic acid, the primary component of Omya's surface treatment), "palmitic" (for palmitic acid, the other component of Omya's surface treatment), and "treatment" (for surface treatment, which is the most common general description of the process at issue). The resulting total number of searches was 7 x 3 x 3 = 63, with copies of the printed search results attached.

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Each of the above queries covered any permits issued since January 1, 1970, in any state, for any company or plant name. In all cases except one, the RBLC Clearinghouse searches yielded a result of "No matching RBLC facilities found". Only the search conducted for "all process types", the "pollutant name" of "VOC", and the "process name contains" of "treatment" yielded a positive result. Eight facilities and nine processes matched those search criteria. However, from an in-depth examination of each process description, it was determined that none was comparable to Omya's process for source or emission characteristics.

As with the RBLC, a general internet search for control technologies used on processes/emissions characteristics similar to Omya's yielded nothing either.

In conclusion, and consistent with TRC's findings in the previous report, HMSER for the organic compounds of interest is best achieved via the use of process modifications to reduce the temperatures to which the stearic acid is exposed. The second round of stack testing confirmed that the process modifications implemented by Omya, which significantly reduced the temperature to which the stearic acid is exposed, resulted in marked organic emissions reductions.

Sincerely,
TRC ENVIRONMENTAL CORPORATION

Mark M. Hultman, P.E.
Principal Consulting Engineer

Attachments

cc: Sam Cha, TRC
Jim Canora, TRC