



June 30, 2006

Mr. Michael Laurent
Environmental Manager
Omya, Inc.
P.O. box 10, Florence Road
Florence, Vermont 05744

RE: Odor survey
TRC Project 45532

Dear Mr. Laurent,

The East Plant of the Omya Inc. Florence facility has modified the manufacturing process for certain treated products. The original production process was believed to be the cause for odor episodes in the neighboring community, and emissions were found to exceed the hazardous air contaminant action levels for formaldehyde and acrolein set by the Vermont Air Pollution Control Regulations. The modified process was expected to emit lower emissions. To confirm the expectations, Omya requested TRC to conduct stack emission testing, which was performed on June 23 and June 24, 2006 when the modified process was in operation. The results of the emission testing are reported in a separate report.

In conjunction with the emission testing, Omya also requested TRC to conduct an odor study. The odor study consisted of two parts, an odor survey during the period between June 22 and June 27, 2006 and an odor impact study. The odor impact study was to include odor emission sampling (samples collected during the stack emission testing), odor threshold value determination of samples collected using an odor sensory judge panel, and dispersion modeling. The procedures used in the current odor study are identical to the procedures used during Phase 2 of the odor study the results of which were reported under cover of letter dated January 12, 2006. The results of the current odor study also are reported in a separate report. Sections below summarize the findings of the current odor survey.

Odor Survey Methodology

TRC performed several walk/drive arounds per day in and near Omya's Florence facility as well as in the surrounding community, including those locations where odor episodes had been reported previously. A typical round included the following routes and areas:

- The parking lot and driveway north of the East Plant and the truck parking lot east of the East plant process building/ warehouse;

Mr. Michael Laurent

June 30, 2006

Page 2 of 3

- The driveways between the East Plant and the West Plant, including the driveway that leads to the Maintenance Department, and the area between the West Plant and the settling ponds;
- The area near the entrance of the West Plant offices on the west side of the West Plant; and
- Whipple Hollow Road, Fire Hill Road, West Creek Road between Martin Road and Depot Hill Road, and River Street.

These walk/drive arounds were performed during the daytime and during the evening and early morning hours when inversion weather conditions could be expected to occur. At such time as odors were perceived, the following information concerning the odors was to be documented:

- Type of odor, including intensity and character;
- Time at which the odor was perceived; and
- Location where the odor was perceived.

At such time as odors were perceived, extra efforts were to be made to trace the odors upwind to the source of the odors and downwind to study the extent of the odor impact.

Weather conditions, including wind speed, wind direction, and ambient temperature, were monitored and recorded by an on-site wind monitor. The monitor, a NOVAL YNX CORPORATION model 200-05103L, was installed on the roof of the East Plant building. The data collected was recorded and stored on the plant operation control computer system. TRC is able to retrieve the current weather condition readings from the computer in the East Plant process control room, and also make notes during the walk/drive arounds by observing flag, smoke, and steam movements.

During the current odor study, Omya called three of the residents in the neighboring communities to inform them of the study and to encourage them to participate in the study by relaying odor episode information to TRC staff.

Odor Survey Results

During the period between 9 PM on Thursday June 21, 2006 and 12 Noon on Monday June 26, 2006, TRC made total of 34 rounds of walk/drive arounds in connection with the odor survey. No odors were perceived during the survey rounds relating to Omya operations. Even at locations adjacent to the East Plant process building, where wax-like odors had been perceived prior to the process modification, odors were not perceived during the current odor survey.

The only odors perceived during the rounds are those related to the farm operations on the survey route. On Sunday June 25, around 10 AM, south of the railway overpass, a W. Creek Road resident was burning leaves/trash in the front yard, and a weak burning odor was perceived in the surrounding area. Also on Sunday June 25, around 9:30 PM, a faint

Mr. Michael Laurent

June 30, 2006

Page 3 of 3

burning odor was perceived on the W. Creek Road near Smith Pond. TRC was not able to determine the origin of the faint odor perceived.

Sincerely,

TRC

A handwritten signature in black ink, appearing to read "Samuel S. Cha". The signature is written in a cursive style with a prominent loop at the end.

Samuel S. Cha
Manager, Odor Assessment
& Control Programs