OHIO E.P.A.
NOV - 8 2006
DIRECTOR'S JOURNAL

BEFORE THE

OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

Mar-Bal, Inc.
16930 Munn Road
Chagrin Falls, Ohio 44023-5495

RESPONDENT

Director's Final Findings
and Orders

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

By: Date: 11-8-06

PREAMBLE

It is agreed by the parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders ("Orders") are issued to Mar-Bal, Inc. ("Respondent") pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency ("Ohio EPA") under Ohio Revised Code ("ORC") §§ 3704.03 and 3745.01.

II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondent and successors in interest liable under Ohio law. No change in ownership of the Respondent or of the facility as hereinafter defined shall in any way alter Respondent's obligations under these Orders.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 3704 and the rules promulgated thereunder.

IV. FINDINGS

The Director of Ohio EPA has determined the following findings:

1. Respondent is a compounder and molder of electrical and structural reinforced thermosetting materials. In this process, Respondent operates the following equipment: three 8,000 gallons resin storage tanks, two 500 gallons pre-blend tanks, seven mixers and three extruders. Three of the seven mixers are exempt from air pollution control permitting requirements. Each of the equipment is an "emissions unit," as defined in Ohio Administrative Code ("OAC") 3745-77-01(O). The facility is located at 16930 Munn Road, Geauga County, Chagrin Falls, Ohio, and is identified by Ohio EPA as facility identification number 0228000194.

2. Each of the emissions units emit, in part, volatile organic compounds ("VOCs") and hazardous air pollutants ("HAPs") [i.e., styrene], as defined in OAC Rules 3745-21-01(B)(6) and 3745-77-01(V). Each emissions unit is an "air contaminant source" as defined in OAC Rules 3745-31-01(I) and 3745-15-01(C) and (W). The facility is considered to be a minor source due to an inherent physical constraint or a bottleneck caused by the limited throughput of the two pre-blend tanks.

3. OAC Rule 3745-15-07(A) defines a public nuisance as the emission or escape into the open air from any source or sources whatsoever, of smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substances or combinations of substances, in such manner or in such amounts as to endanger the health, safety, or welfare of the public, or cause unreasonable injury or damage to property. Further, it states that it is unlawful for any person to cause, permit or maintain any such public nuisance.

4. OAC Rule 3745-31-02 requires that a person not allow the installation or modification of an air contaminant source without first applying for and obtaining a permit to install ("PTI"), except otherwise provided by rule or law.

5. OAC Rule 3745-35-02 requires any owner or operator of an air contaminant source not subject to OAC Rule 3745-77-02 to apply for and obtain a permit to operate ("PTO") prior to operating any air contaminant source, except as otherwise provided by rule or law.

6. ORC § 3704.05(C) prohibits any person from violating any terms or conditions of any permit issued by the Director of Ohio EPA. Similarly, ORC § 3704.05(G) prohibits any person from violating any order, rule or determination of the Director of Ohio EPA issued, adopted, or made under ORC Chapter 3704.

7. Between October 13, 2000 and April 26, 2005, the Lake County General Health District ("LCGHD") and Ohio EPA's Northeast District Office ("NEDO") received several complaints concerning nuisance odor emissions from residents located near Respondent's facility. The residents described the odors as a "plastic substance," "styrene," or a "strange" smell. Additionally, the residents have reported health effects such as headaches, and eye and throat irritation. They claim that they must stay indoors and keep their windows shut when the odors are prevalent. LCGHD has performed surveillance that resulted in the odors being traced to Respondent. Based on the number of complaints and LCGHD's investigations of the complaints, LCGHD alleges that Respondent violated OAC Rule 3745-15-07 and ORC § 3704.05(G) by causing an air pollution public nuisance due to odor emissions. Table 1 attached to these Orders identifies the dates of such complaints.

8. On May 16, 2001, Respondent met with NEDO and LCGHD to discuss the ongoing odor complaints. Respondent was requested to submit a plan to reduce the odors generated by its facility.

9. On June 21, 2001, Respondent sent NEDO a letter stating that due to the odor complaints, Respondent had contracted with a consulting firm to develop an odor reduction plan. Prior to contracting with the consulting firm, Respondent contacted the Styrene Information and Research Council and the Composite Fabricators Association for additional help and understanding of the odor problem.

10. On September 6, 2001, NEDO received a letter dated September 4, 2001, from Respondent, which contained an odor reduction plan.

11. On October 22, 2001, Respondent sent NEDO a letter indicating that the odor reduction plan had been completed. Specifically, Respondent stated that the dust collector exhaust stack had been reoriented and the height had been vertically increased to 24 feet without a rain cap. These changes were based on dispersion modeling results which predicted ground level styrene concentrations, after the changes, to be less than the odor concentration threshold. Additionally, Respondent's letter said that during the first quarter of 2002, work would be completed to assure that the windows located on the outside wall of the mixing room would be kept closed. However, complaints were still received after the odor reduction plan was implemented. It is believed open windows and doors were the reasons why odors were still detected after the implementation.

12. In 2002, Respondent installed a J. H. Day mixer with a 200 gallons capacity. This mixer replaced a former mixer identified by Respondent as mixer # 1051. Respondent assigned the same identification number to the new larger mixer. The prior mixer was rated at 100 gallons, the same rated capacity as the other three mixers at the facility. Respondent installed the 200 gallons capacity J. H. Day mixer prior to applying for and obtaining a PTI, in a violation of OAC Rule 3745-31-02 and ORC § 3704.05(G).

13. On July 9, 2003, Ohio EPA issued four PTOs for Respondent's four mixers (one for the mixer that was replaced in 2002). The PTOs required Respondent to stack test each mixer, within three months after the issuance of the PTOs, to determine the hourly VOC emission rates and to develop VOC emission factors for the mixers.

14. On July 31, 2003, NEDO called Respondent to remind it that the PTOs required stack testing be performed by September 9, 2003.

15. On December 10, 2003, NEDO and USEPA Region 5 conducted a joint inspection of Respondent's facility. During this inspection it was discovered that the rated capacity of four mixers did not match the PTI applications Respondent submitted on

January 31, 2001. Additionally, Respondent was reminded of the stack test requirements specified in the facility's mixer PTOs. Styrene emission calculations and data for the years 2001 and 2002 were obtained by NEDO. These emissions calculations indicated that the actual styrene emission rates for the 2001 and 2002 were below the 10 ton per year major source applicability threshold for a single HAP.

16. On December 22, 2003, NEDO received a letter dated December 18, 2003 from Respondent asking for clarification of the stack test language contained in the facility's mixer PTOs.

17. On January 9, 2004, NEDO responded to Respondent's December 22, 2003, letter. This letter explained that the PTO for each mixer required Respondent to have two stack tests conducted to measure the VOC emissions. The first tests were required to be conducted within three months after the issuance of the PTOs (i.e., September 9, 2003) and the second tests were required to be conducted within six months prior to the expiration of the PTOs (i.e., January 9, 2008). Further, the letter stated that Respondent was in violation of the terms and conditions of the PTOs for failing to perform the first tests within the specified time frame and requested Respondent to submit, within 30 days of the receipt of the letter, a complete Intent-to-Test ("ITT") form.

18. On January 15, 2004, NEDO sent a notice of violation ("NOV") letter to Respondent concerning issues identified during the December 10, 2003, facility inspection. The NOV asked Respondent to submit documentation indicating the installation date and maximum hourly capacity of each mixer as well as any necessary PTI applications. Additionally, potential to emit ("PTE") calculations for facility-wide styrene (HAP) emissions and emission calculations for a sand blasting machine were requested to be submitted within 30 days of receipt of the NOV.

19. On February 5, 2004, Respondent replied to the January 15, 2004 NOV. Respondent listed the current batch capacity of each of the mixers along with the dates they were installed. This information confirmed that the mixer identified as mixer # 1051 was replaced in 2002. Former mixer # 1051, a Baker-Perkins mixer, had a batch capacity of approximately 800 pounds and was replaced with a J. H. Day mixer with a 1,200 pound batch capacity. Respondent asked to be advised of any necessary PTI or PTO changes that would need to be done as result of the mixer replacement. Additionally, the reply stated the shot blast machines were actually thermoset deflashing machines, which had been relocated to Respondent's Southwest facility. Respondent also sent a separate letter to NEDO informing it of its intent to contract with an outside stack testing firm to do the stack tests required by the mixer PTOs.

20. In February 2004, NEDO and Respondent discussed the permitting status of the mixers during a telephone conference call. Respondent stated that it believed that all the mixers, except the newly installed mixer # 1051, were properly permitted.

Respondent told NEDO that the "capacity" of a mixer was different than the hourly operating capacity because of the batch time. NEDO asked Respondent to submit documentation to support its statements.

21. On February 26, 2004, NEDO sent another NOV to Respondent requesting it to submit either PTI applications or documentation that the currently used mixers were the mixers identified in Respondent's prior PTI applications. The NOV also requested Respondent to submitted PTE calculations for the facility's styrene emissions and for the deflashing machines. This information was requested to be submitted within 14 days of receipt of the NOV. Additionally, the NOV recommended that the stack tests required by Respondent's PTOs not be conducted until updated and accurate PTIs were issued.

22. On May 3, 2004, NEDO received a letter dated April 28, 2004 from Respondent, in response to the February 26, 2004 NOV. The response stated that the actual capacity (400 pounds/hr) of the mixers mentioned in prior PTI applications reflected the average pounds per hour produced by the mixers. Respondent further stated that the 400 pound/hr average was still applicable for the mixers although the capacities were higher. However, the response clearly showed that Respondent had replaced mixer # 1051 in 2002 after the previous mixer (100 gallons Baker-Perkins mixer) had broken, without applying for and obtaining a PTI, in violation of OAC Rule 3745-31-02 and OAC § 3704.05(G). Similarly, Respondent operated the replacement mixer without applying for and obtaining a PTO, in violation of OAC Rule 3745-35-02 and OAC § 3704.05(G). This violation occurred from the start of operation (estimated to be January 2002) and continued until Respondent applied for and obtained a PTI for the new 200 gallons J.H. Day mixer. Additionally, the response contained PTE calculations that indicated the facility's "achievable" PTE was less than the major source threshold (i.e., 8.44 tons per year of styrene emissions). However, the calculation of the "theoretical" PTE would classify the facility as a major source of HAPs (i.e., 10.27 tons per year of styrene). Actual styrene emissions were estimated at 7.09 tons per year. Respondent indicated that the "theoretical" PTE could not be obtained due to the size limitation of its current storage area. Respondent indicated that the facility's floor space would have to be increased to over 87,750 square feet (from the current 60,500 square feet) to achieve the "theoretical" PTE. The response also contained information on the compound molded part deflashing equipment.

23. On July 22, 2004, NEDO sent a NOV to Respondent for failing to apply for and obtain a PTI for the installation of mixer # 1051 (i.e., the replacement of the 800 pound capacity mixer with a 1,200 pound mixer). The NOV also stated that based on the information supplied by Respondent, NEDO believed the currently operated mixers did not correspond to the mixers contained in the previous PTI applications. The NOV requested PTIs for the currently used mixers be submitted within 14 days of the receipt of the NOV. Additionally, the NOV stated that based on the "theoretical" PTE Respondent was in violation of operating without a Title V permit and for not paying Title V fees. The NOV

requested that Respondent submit, within 60 days of the receipt of the NOV, a Title V application and FERs for the years 1994 through 2003 within 30 days of the receipt.

24. On August 25, 2004, a telephone conference was held between NEDO and Respondent. Respondent requested and was granted additional time to submit the PTI applications. Additionally, Respondent stated that it believed that the PTE and actual styrene emissions were overestimated. Respondent stated that it was researching similar sources to determine how their styrene emissions were estimated.

25. On September 13, 2004, another telephone conference was held between NEDO and Respondent. Respondent indicated that its research had revealed that similar sources were using a much smaller amount of styrene losses (1 to1.25 percent loss) to estimate styrene emissions than the losses Respondent had used to estimated the PTE of styrene (i.e., 2 percent). Respondent stated that with the lower styrene losses it would be classified as a minor source. Respondent also requested another time extension to submit a PTI application for the replacement of mixer # 1051. Respondent again stated it believed that the other mixers were already properly permitted.

26. On May 31, 2005, Ohio EPA held a meeting with Respondent to discuss the PTI application that Respondent would be submitting as well as the PTE calculations that show Respondent to be a minor source and the associated bottleneck restrictions.

27. On June 24, 2005, Ohio EPA received a PTI application for four mixers (emission units P002 through P005) with the PTE calculation that showed the facility to be a minor source (i.e., less than 10 tons per year of styrene emissions). The PTE calculation reflected a bottleneck (i.e., a physical limitation) caused by limited throughput of the two pre-blend tanks. On July 12, 2005, the application was determined to be complete.

28. On July 25, 2005, Ohio EPA received a revised PTI application for the four mixers, with PTE calculations indicating the facility was classified as minor source. This revised application was determined to be complete on August 2, 2005.

29. On September 28, 2005, Ohio EPA received another revised PTI application for the four mixers. The PTE calculation again indicated Respondent to have less than 10 tons per year of styrene emissions. This application was determined to be complete on November 5, 2005. On this same day Respondent's PTE calculation, that reflected the bottleneck restrictions, was sent to USEPA Region 5.

30. On November 16, 2005, USEPA, Region 5 told Ohio EPA that it agreed that the bottleneck existed and agreed with the procedure that Respondent had used to determine the facility-wide PTE.

31. On November 17, 2005, NEDO electronically-mailed the draft PTI terms and condition for the four mixers to Respondent for its review. The PTI contained the requirement that all four mixers be stack tested for VOC emissions.

32. On December 6, 2005, Respondent commented on the draft PTI. Respondent opposed the requirement to stack test all four mixers. Respondent requested that only emissions unit P005 (the new mixer # 1051) be tested since it was believed to be the largest emitter.

33. On December 20, 2005, NEDO sent a letter to reply to Respondent's comments on the draft PTI terms and conditions. In this letter Ohio EPA rejected Respondent's request to only conduct a stack test for emissions unit P005. Ohio EPA requested Respondent conduct stack tests for all four mixers to confirm compliance.

34. On January 11, 2006, a meeting was scheduled between NEDO and Respondent to discuss permitting language and the facility-wide PTE calculation. Additionally, Respondent scheduled a stack test for emissions units P004 and P005 for January 17 and 18, 2005.

35. On February 9, 2006, Ohio EPA issued draft PTI #02-21414 for the installation of the J. H. Day mixer with a 200 gallons capacity (i.e., new mixer # 1051) and the permit was issued final on March 28, 2006. Respondent installed this mixer in 2002 prior to applying for and obtaining a PTI, in violation of OAC Rule 3745-31-02 and ORC § 3704.05(G). Additionally, Respondent operated the mixer without applying for and obtaining a PTO, in violation of OAC Rule 3745-35-02 and ORC § 3704.05(G). The violation occurred from the date the mixer commenced operation (i.e., January 2002) and ended with the issuance of the PTI.

36. On January 17 and 18, 2006 and February 7, 2006, Respondent conducted the stack tests required by PTI #02-21414. The tests demonstrated compliance with the VOC limitation contained in PTI #02-21414. Respondent failed to timely conduct the stack tests required by its September 9. 2003 PTO, in violation of ORC § 3704.05(C). This violation occurred from September 9, 2003, and ended on February 7, 2006, the day of the last required stack test.

37. The Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with the following Orders and the benefits to the people of the State to be derived from such compliance.

V. ORDERS

The Director hereby issues the following Orders:

1. Pursuant to ORC § 3704.06, Respondent is assessed a civil penalty in the amount of thirty-five thousand five hundred dollars ($35,500) in settlement of Ohio EPA's claims for civil penalties. Within thirty (30) days after the effective date of these Orders, Respondent shall pay Ohio EPA the amount of twenty-eight thousand four hundred dollars ($28,400) of the total penalty amount. Payment shall be made by official check made payable to "Treasurer, State of Ohio" for $28,400. The official check shall be submitted to Brenda Case, or her successor, together with a letter identifying the Respondent, to:

Ohio EPA
Office of Fiscal Administration
P.O. Box 1049
Columbus, Ohio 43216-1049

2. In lieu of paying the remaining seven thousand one hundred dollars ($7,100) of civil penalty, Respondent shall within thirty (30) days of the effective date of these Orders, fund a Supplemental Environmental Project ("SEP") by making a contribution in the amount of seven thousand one hundred dollars ($7,100) to the Ohio EPA's Clean Diesel School Bus Fund (Fund 5CD). Respondent shall tender an official check made payable to "Treasurer, State of Ohio" for $7,100. The official check shall be submitted to Brenda Case, or her successor, together with a letter identifying the Respondent, to the above-stated address.

3. A copy of each of the above checks shall be sent to James A. Orlemann, Assistant Chief, SIP Development and Enforcement, or his successor, at the following address:

Ohio EPA
Division of Air Pollution Control
P.O. Box 1049
Columbus, Ohio 43216-1049

4. Should Respondent fail to fund the SEP within the required timeframe set forth in Order 2, Respondent shall immediately pay to Ohio EPA $7,100 of the civil penalty in accordance with the procedures in Order 1.

5. Respondent shall keep all doors, windows and roof vents in the mixing area closed while any mixer is operating.

VI. TERMINATION

Respondent's obligations under these Orders shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and the Chief of Ohio EPA's Division of Air Pollution Control acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete."

This certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of Respondent. For purposes of these Orders, a responsible official is the person authorized to sign in OAC Rule 3745-35-02(B)(1) for a corporation or a duly authorized representative of Respondent as that term is defined in the above-referenced rule.

VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to the operations of Respondent's facility.

VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to the Respondent.

IX. MODIFICATIONS

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

X. NOTICE

All documents required to be submitted by Respondent pursuant to these Orders shall be addressed to:

Ohio EPA, Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087
Attention: Dennis Bush

and to:

Ohio Environmental Protection Agency
Lazarus Government Center
Division of Air Pollution Control
122 South Front Street, P.O. Box 1049
Columbus, Ohio 43216-1049
Attention: Thomas Kalman

XI. RESERVATION OF RIGHTS

Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except as specifically waived in Section XII of these Orders.

XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only the violations specifically cited in these Orders, Respondent consents to the issuance of these Orders and agrees to comply with these Orders. Compliance with these Orders shall be a full accord and satisfaction for the Respondent's liability for the violations specifically cited herein.

Respondent hereby waives the right to appeal the issuance, terms and service of these Orders and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such an appeal. In such event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless said Orders are stayed, vacated, or modified.

XIII. EFFECTIVE DATE

The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

XIV. SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

IT IS SO ORDERED AND AGREED:

Ohio Environmental Protection Agency

Joseph P. Koncelik
Director

11/6/06
Date

IT IS SO AGREED:

Mar-Bal, Inc.

Signature

10/28/06
Date

Steven Balogh
Printed or Typed Name

Vice President
Title

Table 1

Odor Complaints from Auburn Spring Drive (northwest of Respondent) Residents

Date	Time Odor Detected	Comment
10/13/00	not noted	1st resident called, asked resident to keep a log
10/26/00	8:35 am	
10/30/00	8:50 am	
10/31/00	8:45 am	
11/02/00	not noted	LCGHD & NEDO visited Respondent
11/02/00	7:10 pm	
11/03/00	7:15 pm	
05/01/01	7:20 am	
05/02/01	8:45 pm to midnight	
05/07/01	7:30 am	
05/08/01	7:30 am	
05/08/01		another resident complained
05/15/01		LCGHD & NEDO visited Respondent to discuss odor issue
05/22/01	9:10 pm	
07/02/01	6:30 am	
08/14/01		the 3rd resident complained
08/14/01	6:00 pm	
08/15/01	6:00 am	
08/15/01	7:00 pm	
08/18/01	3:00 am	odor awakened resident
08/22/01	7:15 am	
08/27/01	11:30 pm	

Table 1 (continued)

Odor Complaints from Auburn Spring Drive (northwest of Respondent) Residents

Date	Time Odor Detected	Comment
08/29/01	evening	
08/30/01	morning and evening	
08/30/01	9:15 pm	
09/01/01	morning	
09/06/01	morning	
09/06/01		plan received from Respondent
09/12/01	7:00 am	
09/12/01	10:00 pm	
09/15/01	morning	
09/17/01	morning and afternoon	
09/18/01	morning	
10/16/01		Respondent called to say stack modifications were completed on 10/11/01
12/05/01	8:00 am	strong odor reported
12/17/01	8:50 am	
01/11/02	2:45 pm	LCGHD detected a slight odor close to Respondent
02/18/02	12:10 pm	
03/20/02		
08/21/02		

Table 1 (continued)

Odor Complaints from Auburn Spring Drive (northwest of Respondent) Residents

Date	Time Odor Detected	Comment
09/18/02	on going from 09/14/02	
09/18/02		LCGHD detected a slight odor close to Respondent
09/20/02	odor for a few weeks	
09/30/02	6:50 pm	
09/30/02	9:30 pm	odor reported to be worst at 6:50 pm
10/02/02		odor reported to bad in the evening
11/18/02	5:30 pm	
11/19/02	5:15 to 9:00 pm	
01/03/03	12:20 pm	
01/24/05		LCGHD detected a slight odor close to Respondent
07/29/04	8:20 am	detected at end of Auburn Spring Dr.
07/30/04	10:30 am	very strong detected at end of Auburn Spring Dr. and at cul-de-sac
07/30/04	6:40 pm	detected at end of Auburn Spring Dr.
07/30/04	10:00 pm	detected at end of Auburn Spring Dr.
08/18/04	8:00 pm	detected at end of Auburn Spring Dr.
08/24/04	8:00 pm	detected at end of Auburn Spring Dr.
08/25/04	2:35 pm	entire street
08/25/04	4:00 pm	entire street

Table 1 (continued)

Odor Complaints from Auburn Spring Drive (northwest of Respondent) Residents

08/25/04	7:00 pm	entire street
08/25/04	8:10 pm	entire street
08/26/04	1:30 pm	strong smell at cul-de-sac
08/26/04	5:55 pm	detected at end of Auburn Spring Dr. and at cul-de-sac
09/10/04	7:55 am, 8:50 am, 3:50 pm	strong styrene smell
09/13/04	10:10 am; 3:50 pm	odor so bad young children could not play outside
09/14/04	7:55 am, 4:00 pm	odor so bad young children could not play outside
09/15/04	5:30 am, 7:50 am, 3:50 pm, 6:45 pm	odor so bad young children could not play outside
09/16/04	6:30 am	odor so bad young children could not play outside
09/20/04	all day	odor very strong
09/21/04	all day	odor very strong
09/22/04	all day	odor very strong
10/01/04	9:00 am, 4:00 pm	
10/05/04	8:10 am	
10/08/04	2:30 pm, 5:00 pm, 6:30 pm	
10/14/04	10:05 am, 1:30 pm, 7:20 pm, 8:40 pm	Strong styrene smell
10/15/04	9:00 am, 12:30 pm	Strong styrene smell

Table 1 (continued)

Odor Complaints from Auburn Spring Drive (northwest of Respondent) Residents

November 2004	almost daily weekday complaints from various citizens	could not stay outside on some days due to the smell
December 2004	smell is very strong mostly mornings around 8 am	some days smell so strong the citizens claim they can not stay outside and that their noses and eyes burn.
January 2005	morning strong odors continue to be noticed daily also noticeable smell in the afternoons	very strong smell in closed garage on January 25,2005 around 8:50 am
02/03/05	8:10 am	
02/01/05	8:00 am, 9:00 am, 3:00 pm	styrene smell
02/02/05	7:50 am	strong styrene smell
02/04/05	8:00 am and 9:05 am	
02/07/05	8:00 am	
02/08/05	8:10 am, 9:15 am, 2:40 pm	
02/09/05	2:50 pm	
02/10/05	8:00 am, 9:00 am, 6:45 pm	very strong styrene odor reported at 6:45 pm
02/11/05	9:00 am and 2:40 pm	
02/14/05	8:00 am	
04/26/05	5:30 am, 9:00 am, 11:00 am, 6:00 pm	very strong styrene odor reported at 6:00 pm