

January 5, 2005

Mr. Robert G. Burnley, Director
Virginia Department of Environmental Quality
P. O. Box 10009
Richmond, VA 23240

Re: Appeal of plastics-burning practice at Columbia Forest Products - Chatham.

Dear Mr. Burnley:

Thank you for your attention to our concerns during the Community Open House in Lynchburg on October 20, 2004. As we discussed, we are looking for solutions to the recently-escalating problems of smoke, odors, and noise from the Columbia Forest Products plant in Chatham. Significant communications with officials from both the plant and the South Central Regional Office DEQ have so far failed to resolve the difficulties.

During the October 20 meeting, we mentioned several aspects of the problem, perhaps the most pressing of which involves the burning of plastics in a primitive low-temperature boiler at the facility, allowed by South Central Regional Office DEQ officials, in contradiction to the apparent intent of the air permit, and also in contradiction to acceptable environmental practice. At least three types of plastics are involved: urea-formaldehydes, polyurethanes, and acrylics.

Following is a brief comparison of the burning restrictions in the plant's air permit with a list of the products actually being burned.

<i>The air permit says:</i>	<i>The following are being burned annually:</i>
"The approved fuel for the boiler is wood waste generated from the hardwood panel consolidation facility, excluding any wood which contains chemical treatments or paper or plastic laminates."	Approximately 12 million pounds of: Hardwood and softwood veneers; Wood and wheatstraw from composite core boards; Miscellaneous wooden shipping pallets; Urea-formaldehyde resin from veneer application; Urea-formaldehyde resin from composite core boards; Polyurethane resin from core boards; Acrylic stains from the UV-finishing process; Acrylic finishes from the UV-finishing process.

Following is a list of some of the hazardous byproducts of burning these plastics:

<i>Source:</i>	<i>Byproduct:</i>	<i>Effects on humans:</i>
Urea-formaldehyde and polyurethane resins, and some acrylics	Hydrogen cyanide and isocyanates	Prevent cells from utilizing oxygen. Low exposure can cause nausea, vomiting, breathing difficulties, heart pains, blood changes, headaches, thyroid enlargement, optic nerve damage and blindness. Extended or heavy exposure may cause asthma, harm to the brain and heart, coma and death.
Acrylics	Acrolein	Retained irreversibly in the respiratory tract. Low exposure may cause irritation to the eyes, nose, throat and lungs. Extended exposure may cause general respiratory congestion. Exposure to higher levels may cause death.
Urea-formaldehyde and polyurethane resins, and acrylics	Formaldehyde	Low exposure causes eye and respiratory irritation. Extended or heavy exposure can cause asthma, nausea, vomiting, severe headaches, nosebleeds, impaired lung function, pneumonia, and/or respiratory failure ending in death. It is classified as a possible carcinogen.

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<i>Source:</i>	<i>Byproduct:</i>	<i>Effects on humans:</i>
Urea-formaldehyde and polyurethane resins, and acrylics	Ammonia	Low exposure causes eye and respiratory irritation . Repeated or prolonged exposure to high levels may damage the eyes, liver, kidneys, and lungs , and may cause bronchitis , with cough, phlegm and shortness of breath.
Urea-formaldehyde and polyurethane resins, and acrylics	Carbon monoxide	Reduces the availability of oxygen in the blood. Low exposure causes headache, fatigue, and dizziness . Extended or heavy exposure may be fatal .

You will find that the above points are fully supported in the attached documentation, which includes copies of pertinent references and records as requested.

The discomfort presently caused to residential neighbors is significant. The danger is unacceptable. The fact that the byproducts are not regulated by the plant's permits, nor required to be reported in full in their annual emission reports, is inexcusable. That even the company's own data sheets require the disposal of these materials by licensed incineration or landfill, rather than low-temperature, minimally-controlled burning, is remarkable.

The Columbia Forest Products facility was a compatible neighbor to all of us for decades. We trust that the Commonwealth, acting through the Department of Environmental Quality, can obtain correction of the apparent compounding of errors for the past few years, so that our community can return to the safety, health, and tranquility so long enjoyed.

Yours truly,

(Signatures on next page)

Gillispie, Mitchell, Watson, et al, to Burnley
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Enclosures:

Detailed discussion
Document references
Videotape of Columbia Forest boiler emissions

Copies to other Community Open House group participants:

Mr. David J. Brown, Air Permit Manager, DEQ South Central Regional Office,
7705 Timberlake Road, Lynchburg, VA 24502
Ms. Kathy Frahm, DEQ Director of Policy, P. O. Box 10009, Richmond, VA 23240
Ms. Helen Tansey, The Nature Conservancy, 530 E. Main St, Suite 1020,
Richmond, VA 23219

Copies to local officials:

The Hon. Charles Hawkins, Virginia Senate, P. O. Box 818, Chatham, VA 24531
The Hon. Robert Hurt, Virginia House of Delegates, P. O. Box 2, Chatham, VA 24531
The Hon. George Haley, Mayor, Town of Chatham, P. O. Box 370, Chatham, VA 24531