

## **Introduction**

We are urgently requesting, as stated in our cover letter, that the Commonwealth of Virginia, through the Department of Environmental Quality, halt the current practice of burning plastics at the Columbia Forest Products plant in Chatham, Virginia. The following text provides the reasons we are alarmed, and the facts which call for your attention.

Included is information regarding Columbia Forest's air permit, its boiler, and the products being produced and burned. Also within are scientific and medical references regarding the hazardous byproducts of combustion of the plastics being processed at this facility. (At least three types of plastics are involved: urea-formaldehydes, polyurethanes, and acrylics.) Copies of pertinent records and references are annotated in the text and attached, as requested.

## **Air Permit Restrictions, Columbia Forest Products-Chatham**

### **Current Restrictions on Burning**

The current air permit (reference 1C-01) for Columbia Forest Products - Chatham, issued by the South Central Regional Office DEQ on August 28, 2003, includes the statement:

*"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."*

We have been advised verbally by Craig Nicol, Allen Armistead, and David Miles of the South Central Regional (Lynchburg) Office DEQ that, according to their interpretation of the above, it is permissible for the plant to burn *as wood wastes* urea-formaldehyde and polyurethane resins and acrylic finishes and stains. It is this practice which we are appealing.

As a result of this interpretation of the permit by the Lynchburg DEQ staff, Columbia Forest Products is burning these plastics without restriction, and without any reporting of emissions from that burning (the Catch-22 assumption is that, according to the permit, only *wood wastes* are being burned, so only *wood* emissions are calculated).

### **Original Permit Wording Lists Wood as Fuel**

When the present boiler (a salvaged 1916 German ship's boiler) was installed at the plant in 1980, regional engineer Thomas L. Henderson (present director of the Lynchburg DEQ office) stated in an analysis and evaluation (1C-02):

*"Kiln dried wood will be used as fuel."*

In both the draft (1C-03 through 1C-08) and the final (1C-09 through 1C-11) permit, the statement was simply:

*"The approved fuel for this unit is woodwaste."*

### **1998 Change Created Loophole Allowing Plastics**

Eighteen years passed before changes occurred in the permit description of the fuel.

On June 17, 1996, Columbia Forest Products' consultant SECOR provided a more elaborate description (1C-12), indicating the fuels being used in the boiler at that time:

*"The facility uses a hogged fuel boiler to provide steam for the plywood presses. The hogged fuel is "white wood" (no bark) consisting of plywood trim, sawdust, sander dust, and scrap such as crate heads. The average moisture content is estimated to be 10%."*

That description mentions plywood, but does not mention the resin it contains. The description also does not mention the later-to-come torrent of plastics in sawed, chipped, and sanded composites and finishes.

The first hint of potentially significant anticipated changes appear on October 14, 1997, when a draft of a new permit (1C-13) included the newly-constructed statement:

*"The approved fuel for the boiler is wood waste, excluding any wood which contains chemical treatments or has affixed thereto paint and/or finishing materials or paper or plastic laminates."*

Such a provision indicates likely concern about the types of burning which are now being done at the plant. However, in an undated subsequent rough draft (1C-14), the portion *"or has affixed thereto paint and/or finishing materials"* is scratched through, thus deleting that restriction.

On December 16, 1997, SECOR addresses the question of materials burned (1C-16, 1C-17) as follows:

*"As the DEQ is aware, CFP burns the ply trim from plywood which contains resin, as well as sanderdust which contains sealer coating material, in the boiler. The facility would like this acceptable practice to be documented in writing to distinguish it from 'any wood which contains chemical treatments . . .'"*

The term plywood is still used at this point (rather than "composite") as the source of resin, but the question of "sealer coating material" is introduced, without stating that the material is actually acrylic.

In a further, somewhat-confusing, attempt at clarification on December 23, 1997 (1C-17, 1C-18), Larry Leonard of the Lynchburg DEQ office stated:

*“ . . . the ‘wood waste’ condition has been clarified; it includes composite wood generate on-site, but prohibits burning of waste containing plastics or chemical treatments such as creosote.”*

Thus the term “composite” is first introduced by Mr. Leonard, but his statement is contradictory in that the composites involved are mixtures of woods and plastics, and yet he asserts that the burning of waste containing plastics is prohibited.

In the permit as granted (1C-19), the final statement regarding approved fuel is:

*“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.”*

Under this wording, and with the Leonard “clarification,” the Lynchburg DEQ office has apparently created loopholes **allowing the burning of** at least three types of **plastics** (urea-formaldehyde and polyurethane composites, and acrylic finishes), as well as softwoods (more aromatic in nature than hardwoods). At the same time the DEQ has left in place (ineffective) wording indicating the unacceptability of burning plastics and chemicals. The resulting **permit gives the appearance of protecting the surrounding population** from such a practice, while **actually allowing these plastics and chemicals to be burned without acknowledgment, accountability, or restriction.**

### **Result is Horrendous Increase in Smoke and Smell in the Neighborhood**

In recent years, the smoke and smells from the plant have become oppressively worse in the neighborhood and town. At times in the past, the plant’s smoke was recognizable as wood smoke. Now, much of the time, the strong odor is like **burning rubber, rotting fish, chicken manure, and other various non-wood smells** which are consistent with the burning of plastic resins and finishes. Additionally, the particle fall has also intensified. The most visible typical particulate residue is brown fibers (1A-05 through 1A-07), indicating that a significant proportion of the material being heated in the boiler is simply not burning. (Note that, in addition to the plastics question, wood particles, unburned and burned, are a significant health hazard – see product data in 1E-01 through 1E-93 and 1D-35, and other information at 1F-33.)

Noise, smoke, and smell from the plant all began to rapidly increase beginning around mid-2001. Calls to the plant regarding various incidents in 2001 and 2002 always brought a variation of the response, “We’re working on [something].” Neighbors note that for decades only very occasional difficulties had occurred, which had always been corrected, so there was a significant residual of patience toward the plant. However, by early 2003 the situation had far exceeded anything experienced before, and attempts were made by local citizens to obtain improved conditions, through contacts directly with plant management, and through

governmental officials at all levels, and the DEQ. To date the noise, smoke, and smell problems continue to worsen.

We, the authors of this correspondence, believe that ending the practice of burning plastics will be a major step toward correcting the severe problems we are experiencing.

## **The Company's Products**

### **Hardwood and Softwood Veneering**

The Columbia Forest plant in Chatham applies hardwood (including oak, birch, poplar, maple, cherry, ash, mahogany, walnut, and teak) and softwood (including pine and cedar) veneers to various core boards for use in interior construction, cabinetry, etc. (see references 1D-01 through 1D-29).

### **Early Use of Plywood Core Boards**

The discussion and wording of the original 1980 permit for the Columbia Forest boiler (see above) indicates that it was assumed that the plant would be using cores made of wood, commonly referred to as "veneer cores" (1B-02). Such boards do contain urea-formaldehyde resin between the layers, and therefore the wisdom of the original permit could be argued in retrospect. However, the resin content of veneer cores is apparently low in comparison to composite cores which are the overwhelming favorites in today's production. One example of interior grade plywood contains .1% up to 5% urea-formaldehyde resin by weight (1E-63).

### **Use of MDF Composite Core Boards (with Urea-Formaldehyde Resin)**

Apparently the most frequently used core board at present is medium density fiberboard (MDF), made of wood fiber bonded with a urea-formaldehyde resin. Also utilized are lower-density boards, usually called particleboard core (PBC), also made of wood fiber bonded with urea-formaldehyde resin.

Examples of MDF boards range up to 30% urea-formaldehyde resin by weight (1D-40, 1E-72, 1E-77, 1E-85, 1F-49), with apparently typical ranges around 9% - 12%. PBC boards seem to fall in the range of 9% - 12% urea-formaldehyde resin by weight (1D-40). MDF and PBC boards contain up to 10% paraffin wax as well, with the typical content being less than 2% (1E-72, 1E-77, 1E-85, 1F-49).

### **Use of Woodstalk Composite Core Boards (with Polyurethane Resin)**

Dow Chemical's Woodstalk™ boards, consisting of wheatstraw in a polyurethane resin, are also utilized. Strawboards typically contain 3% - 5% polyurethane resin by weight (1D-36, 1F-54). Strawboards also may include up to about 6% of paraffin wax and/or unidentified proprietary chemical additives (1D-36).

## **Adding Veneers Also Adds Resins**

The Columbia Forest Product plant typically adds veneer on both the front and rear faces of core boards. The resin typically used to secure those veneers onto the core board is of the urea-formaldehyde type (see the company's suppliers' data sheets 1E-40 through 1E-47). The company also advertises the availability of no-added-formaldehyde resin (see 1E-06); some of those resins used in industry are of the polyurethane type. The veneering process also involves the addition of wood fillers (1E-21 through 1E-23).

## **Addition of Acrylic Stains and Finishes**

Some of the boards processed at the plant also are stained and finished with an ultraviolet (UV) polymerizing technique(1D-08), which adds acrylic layers on the outside.

## **All Products Sanded, Sawed, Chipped, Burned**

All products manufactured at the plant go through processes of sawing (trimming) and sanding (the sander dust is collected for burning). All the trimmed waste is chipped ("hogged"), along with discarded wood pallets. In the process the sanded and chipped waste accumulates the resins, filler, stains, and finishes present at each step of the manufacturing process. About half of the waste is reportedly burned in the boiler at the plant, and the other half is said to be disposed of elsewhere.

If the boiler burns around 10 million pounds of waste per year (the records below show numbers as high as over 12 million pounds), and one assumes that only half is from product waste (the other half's being discarded shipping pallets), and 10% of product waste is plastics, then **500,000 pounds of plastics are being burned at the plant per year, or about a ton per workday.** (We believe that all those assumptions err on the conservative side.)

We note that **none of these types of products – composites, finishes, used pallets – are allowed to be burned at the nearby wood cogenerator facilities (1F-58) in Hurt, Virginia, because of the unacceptable nature of the resulting by-products.** The archaic, primitive Columbia Forest boiler is far less capable of proper combustion than the modern cogenerator equipment, and its location and stack are also poorly located and configured relative to nearby residential areas. Therefore, it seems logical and quite prudent that **these materials should not be burned here.**

## **The Boiler at Columbia Forest Products-Chatham**

### **Primitive Salvaged 1916 German Ship's Boiler**

The boiler at Columbia Forest is a salvaged and converted 1916 German ship's boiler, which was likely originally designed for burning coal. **It has neither an auxiliary fuel source, nor other design features found in modern equipment to insure rapid and complete**

**combustion.** Therefore it is **only capable of burning at low and variable temperatures.** For these and other evident reasons, it is anything but a modern and efficient device for burning wood wastes, much less when plastic resins and finishes (and wax) are included in those wastes.

### **Topography Exacerbates Problems from Smoke and Smells**

The boiler stack (1B-04) is short (40 feet). The Columbia Forest plant lies in a deep valley on the western edge of the town of Chatham. Due to the location and topography, the **prevailing winds carry the smoke and smells of the plant directly into the town** much of the time. The **top of the stack is significantly below the nearest homes to the east, and over a hundred feet below the center of town and the two local prep schools.** The heavier-than-air emissions often hug the ground, fill the valleys, and push as concentrated, compact zones of smoke and dust into various parts of town, depending on atmospheric conditions.

### **Large Increase in Material Burned**

DEQ records since 1980 show a significant increase in the amount of wastes burned per year in the boiler:

<i>Date</i>	<i>Source</i>	<i>Reference Document</i>	<i>Annual Fuel Burned</i>
10/22/1980	Permit modification	1B-04	1250 tons
10/28/1988	Inspection report	1B-08	1785 tons
01/06/1989	Registration update	1B-10	2500 tons
06/17/1996	Permit application	1B-11	3416 tons
11/05/1997	Permit modification	1B-12	4271 tons
01/25/1999	Annual recordkeeping draft	1B-13	5232 tons
03/25/1999	Annual recordkeeping final	1B-14	2802 tons
02/08/2000	Annual recordkeeping final	1B-15	3474 tons
03/01/2000	DEQ summary	1B-16	3402 tons
2000	Emission calculations	1B-17	6637 tons
02/01/2001	Annual recordkeeping	1B-18	3661 tons

2001	DEQ summary	1B-19	5562 tons
01/04/2002	Annual recordkeeping	1B-20	3090 tons
04/04/2003	DEQ summary	1B-21	<b>6082 tons</b>

Although the reports are erratic as to the specific amounts, the overall trend is dramatically **upward**, around **five times the original**. With increasing numbers such as these, it seems likely that the **aged boiler** is being utilized in a **more intensive manner than its design allows**. Add the fact that plastics and straw, as well as wood, are known to cause **significant slagging and maintenance problems in boilers** (1F-04, 1F-25, 1F-61, 1F-62 through 1F-68). These circumstances are all consistent with the disturbing and continuing increases in air pollution being experienced near the Columbia Forest facility.

As shown in further information below, the materials being burned at the facility actually **require incineration** for disposal, **not mere low-temperature, largely-uncontrolled burning, which guarantee excessive dangerous emissions** (1F-04 through 1F-24, 1F-26). The **standard industry practice for disposal** of woodwastes containing resins and finishes is **either incineration or disposal in hazardous-waste landfills** (1F-56).

The Columbia Forest Products **boiler**, since its purpose is the production of process steam rather than destruction of the fuel material, **is by definition not an "incinerator."** (See EPA definitions, 1G-01 through 1G-03). The observed residues of burning also make it obvious from a practical standpoint that the combustion process that is occurring is nowhere near that of incineration. Furthermore, the location of the plant and its boiler, in a deep ravine immediately to the west and upwind of the town of Chatham, would be an extraordinarily inappropriate site for even an "incinerator" processing materials which produce hazardous combustion by-products.

### **Videotaped Boiler Emissions**

Enclosed with this document is a videotape showing **boiler emissions** on numerous occasions during the past several months. The images were obtained **under widely-varying atmospheric conditions**, and on **all days of the week including Saturdays and Sundays**. It is **evident from the heavy smoke** in the videotaped images that **combustion is incomplete** in this boiler, and thus a **dangerous condition** exists regarding hazardous byproducts of plastics burning (see below).

It can also be seen from the videotaped episodes that the boiler emissions tend to travel in **concentrated streams**, and **collect and build in the nearby neighborhoods**, thus causing very uncomfortable conditions for the neighbors. It is evident that such incidents, frequent in nature, are dangerous to the health of residents.

## Wood Stove Comparisons

Brochures distributed by the Lynchburg DEQ office give advice which may be pertinent to the Columbia Forest Boiler situation.

First, the EPA's "Wood Stove Features and Operation Guideline for Cleaner Air" states, "Watch for signals: **Visible smoke leaving the top of the chimney** or long lazy flames leaving the firebox are signs of **incomplete starved-air burning.**" (1F-37)

Second, the State Air Pollution Control Board's "Before You Light Your Woodstove" advises, "**Such materials as plastic do not burn up completely** and can clog the pipes and chimney, as well as **foul the air.**" (1F-34)

In this context, Columbia Forest's plant manager David Abts was quoted in the local media (1F-29) as follows:

*The general manager said he's baffled by complaints of smoke and odor, noting glue used in making plywood is basically an extended flour paste and the plant operates a wood-fired boiler.*

*"We burn pretty much what you would in your fireplace at home," he said.*

Columbia Forest's wastes are not appropriate for a fireplace, a wood stove, or even the plant's boiler, as will be further demonstrated below.

## The Burning of Plastics

### General Problems

The combustion of plastics presents a number of problems in the toxic chemical products of combustion (1F-01). One authoritative study funded by EPA is reported as EPA-670/2-73-049, *Combustion Products from the Incineration of Plastics*, by Boettner, Ball and Weiss, University of Michigan, 1973. Their conclusions include the statement (1F-04) that,

*"On incomplete combustion [of plastics containing nitrogen], hydrogen cyanide, cyanogen, nitriles and ammonia may form in addition to hydrocarbon gases, presenting a significant health hazard . . ."*

The "plastics containing nitrogen" category would include urea-formaldehyde, polyurethane, and some acrylics, **all of which are currently allowed to be burned in the Columbia Forest Products boiler.**



The Boettner testing of the combustion of plastics is reported (1F-02) to have:

*“ . . . generated large numbers of gaseous and condensed products. Additional gaseous products included **straight-chain saturated and unsaturated hydrocarbons through hexane, aromatic hydrocarbons, hydrogen chloride, sulfur dioxide, cyanides, ammonia, and oxides of nitrogen.** Liquefied fractions produced by most plastics were complex mixtures of **10 to 50 compounds, including heterocyclic and polycyclic hydrocarbons.**”* (Emphasis is added here and in quotations below.)

### **Urea-Formaldehydes**

On p. 73 of the above-mentioned Boettner study's urea-formaldehyde tests (1F-16), the authors, finding significant cyanide content, state:

*“**Cyanide and carbon monoxide** are the only acutely toxic compounds identified in either of our studies. The fact that animals removed from exposure before death recovered rapidly is evidence for **this particular combination of toxicants**’ being responsible for the observed effects.”*

Urea-formaldehyde is probably **the plastic burned in greatest quantities** at the Columbia Forest Products plant in Chatham, because it is the binder in all core boards except Woodstalk™ (which contains polyurethane resin – see below) used at the plant, plus is the major binder used to adhere the plant's veneers. Thus the sander and saw dust and scrap all contains a significant percentage, probably on the order of 10% or more (see discussion on pp. 4-5 above), of urea-polyurethane resin.

### **Polyurethanes**

A similar result occurred in the Boettner study's polyurethane tests: hydrogen cyanide is the most significant product of combustion, besides carbon dioxide and carbon monoxide, in every sample studied. The authors state (1F-14, 1F-15) on pp. 55-56:

*“**Carbon monoxide and cyanide** are the only acutely toxic compounds identified . . . . Since carbon monoxide disrupts the blood's ability to carry oxygen and cyanide disrupts the cell's ability to use oxygen, there is a toxicological synergism between these two compounds making their **combination particularly hazardous.**”*

Polyurethane resins are the binder used in the Dow Woodstalk™ core board utilized at the plant.

### **Acrylics**

Some acrylics produce **cyanide** on burning, as do plastics urea-formaldehyde and polyurethane. All acrylics produce **acrolein** on burning. Acrolein is very dangerous to the eyes,

skin, and especially the respiratory system (see attached 1F-95, 1F-99 through 1F-102, 1F-105). It is **retained irreversibly in the respiratory tract** after exposure by inhalation (1F-107).

All finishes and stains applied at the Columbia Forest Products plant are **acrylic**. After application of the stains and finishes by a ultraviolet (UV) polymerization process, the resulting finished boards are sanded and trimmed, and the resulting sander and saw dust and scrap, all of which include acrylics, are burned.

Doane Cowan, Columbia Forest Divisional Engineer, sent DEQ's Allen Armistead a letter (1A-01) on May 4, 1995, with an attachment (1A-02) containing the following statement:

*"Vapours caused by the combustion of U. V. curable products are extremely irritating and must be avoided. Proper respiratory protection must be worn if a fire occurs in any area where U. V. curable products are present."*

It is noteworthy that those products are now being **burned intentionally**, and the neighbors who are being forced to breathe the "extremely irritating" smoke are certainly not wearing "proper respiratory protection."

### Summary of Hazards of Plastics Burning

Following is a list of some of the hazards of burning these plastics, referenced to Columbia Forest Products' and their suppliers' data sheets and other explanatory literature:

<i>Source:</i>	<i>Byproduct:</i>	<i>References:</i>	<i>Effects on humans:</i>
<b>Urea-formaldehyde and polyurethane resins, and some acrylics</b>	<b>Hydrogen cyanide and isocyanates</b>	1D-35 1E-03 1E-07 1E-11 1E-42 1E-47 1F-01-02 1F-04 1F-11-18 1F-41 1F-44 1F-46-47 1F-79-93	Prevent cells from utilizing oxygen. Low exposure can cause <b>nausea, vomiting, breathing difficulties, heart pains, blood changes, headaches, thyroid enlargement, optic nerve damage and blindness.</b> Extended or heavy exposure may cause <b>asthma, harm to the brain and heart, coma and death.</b>

Acrylics	Acrolein	1F-01 1F-94-109	<b>Retained irreversibly in the respiratory tract.</b> Low exposure may cause <b>irritation to the eyes, nose, throat and lungs.</b> Extended exposure may cause <b>general respiratory congestion.</b> Exposure to higher levels may cause <b>death.</b>
Urea-formaldehyde and polyurethane resins, and acrylics	Formaldehyde	1E-01 1E-03 1E-07 1E-42 1E-47 1F-110-122	Low exposure causes <b>eye and respiratory irritation.</b> Extended or heavy exposure can cause <b>asthma, nausea, vomiting, severe headaches, nosebleeds, impaired lung function, pneumonia, and/or respiratory failure ending in death.</b> It is classified as a <b>possible carcinogen.</b>
Urea-formaldehyde and polyurethane resins, and acrylics	Ammonia	1E-50 1E-53 1F-02 1F-04 1F-11-18 1F-123-136	Low exposure causes <b>eye and respiratory irritation.</b> Repeated or prolonged exposure to high levels may <b>damage the eyes, liver, kidneys, and lungs,</b> and may cause <b>bronchitis,</b> with cough, phlegm and shortness of breath.

<b>Urea-formaldehyde and polyurethane resins, and acrylics</b>	<b>Carbon monoxide</b>	1D-35 1E-01 1E-03 1F-04 1E-07 1E-11 1E-31 1E-34 1E-36 1E-42 1E-47 1F-11-18 1F-40 1F-137-140	<b>Reduces the availability of oxygen in the blood. Low exposure causes headache, fatigue, and dizziness. Extended or heavy exposure may be fatal.</b>
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### The Related Paraffin Problem

The composite boards (MDF, particleboard, strawboard) being burned in the boiler all contain paraffin wax, typically in a quantity less than the plastic resin contained in the same product. Paraffin is a **fire retardant** material, and **generates dense smoke upon burning** (1E-98). It is likely that paraffin from composite boards **significantly contributes to problems of incomplete combustion and heavy smoke** of the Columbia Forest boiler.

If one assumes that the paraffin content of the composite boards is only 1% (it can range up to 10%), which would be about a tenth of the plastic resin content, the boiler would be burning somewhere in the range of **50,000 pounds of paraffin per year**.

### Fire Retardancy in General

The Federal Item Identification Guide includes in its **fire retardant** coatings listing (1F-68 through 1F-77) not only **paraffin wax**, but also **acrylics, urea resins, and polyurethane**. A logical inference from such a listing is that the burning of such items could hardly be efficient, and that in order to achieve **complete combustion** of these **fire-retardant materials, high temperatures and precise controls of all variables of the combustion process** would be necessary. **None of those process characteristics occur in the Columbia Forest boiler.**

Additionally, **Woodstalk™** strawboard is actually classified as a **Class C (or Class 3) Fire Retardant** (1D-05, 1D-34).

## Product Disposal Instructions

The following published **instructions** in Material Safety Data Sheets from **Columbia Forest Products and their suppliers** emphasize the need for **incineration**, thus making it clear that the current disposal procedures at the Chatham facility are inappropriate.

<i>Product Sheet</i>	<i>Listed Byproducts of Burning</i>	<i>Safety Factors Related to Burning</i>	<i>Disposal Instructions</i>
Columbia Forest Hardwood Plywood (1E-01)	Carbon dioxide, methane, carbon monoxide, aldehydes, and organic acids	Formaldehyde and wood dust cause respiratory and other irritations, and are both considered carcinogens	Landfill or <b>incineration</b> .
Columbia Forest -Formaldehyde- and No-Added-Formaldehyde Bonded Boards (1E-02 – 1E-09)	Irritating and toxic fumes and gases, including carbon monoxide, hydrogen cyanide, aldehydes, organic acids, and polynuclear aromatic compounds	Formaldehyde and wood dust cause respiratory and other irritations, and are both considered carcinogens	In accordance with regulations.
Dow Chemical Co. Woodstalk™ Boards (1E-10 – 1E-16)	May include but are not limited to phenolics, carbon monoxide, carbon dioxide, polycyclic aromatic compounds, nitrogen oxides, hydrogen cyanide	Fire fighters wear self-contained breathing apparatus	Do not dump into any sewers, on the ground, or into any body of water. Preferred options include licensed, permitted recycler, reclaimer, <b>incinerator</b> , landfill.

<p>R&amp;D Coatings Storm Cloud UV Stain RD113-46A (1E-17 - 1E-20); UV Wood Sealer RD1023 (1E-30 - 1E-32); UV Topcoats RD1056, RD1089 (1E-33 - 1E-38)</p>	<p>(Not listed in document.)</p>	<p>Fire fighters wear self-contained breathing apparatus and complete personal protective equipment when entering confined areas where potential for exposure to vapors of combustion exists</p>	<p><b>Incinerate</b> or use biological treatment in accordance with Federal, State, and Local regulations. This material is a hazardous waste under current RCRA regulations because of reactivity.</p>
<p>Willamette Valley Co. Face Grade Wood Filler (1E-21 - 1E-23)</p>	<p>(Not listed in document.)</p>	<p>Fire fighters wear self-contained breathing apparatus</p>	<p>Landfill or <b>incineration</b></p>
<p>Borden Casco-Resin CR-595LF Urea-formaldehyde Resin (1E-39 - 1E-45)</p>	<p>Carbon dioxide, carbon monoxide, aldehydes (including formaldehyde), hydrogen cyanide, particulate matter and other organic compounds.</p>	<p>Formaldehyde is a potential cancer hazard, and may also cause respiratory and skin problems. Avoid prolonged or repeated breathing of vapor. If airborne contaminants are generated when the material is heated, sufficient ventilation should be provided. Where air contaminants can exceed acceptable criteria, use respiratory protection equipment.</p>	<p>Dispose according to local, state, and federal requirements.</p>

Neste Resins Chembond Urea Formaldehyde Resin (1E-46 - 1E-47)	Hydrogen cyanide, carbon monoxide, carbon dioxide, formaldehyde, nitrogen oxides, sulfur oxides, sodium oxide and sodium carbonate particulates.	Fire-fighting: wear full protective clothing and NIOSH approved self- contained breathing apparatus.	(Not listed in document.)
Chemcraft Sadolin UV Sealer 437-5085; UV Topcoat 437- 5065 (1E-48 - 1E-54)	Ammonia	Avoid all personal contact and breathing of vapors or spray mist. Fire fighters must wear self contained breathing apparatus or air mask.	Dispose in <b>chemical disposal area</b> or in a manner that complies with local, state, and federal regulations.

The following entries from other manufacturers are listed as representative and illustrative of acrylics (all the stains and finishes) and paraffin wax (in all the composite boards) at Columbia Forest Products.

<i>Product Sheet</i>	<i>Listed Byproducts of Burning</i>	<i>Safety Factors Related to Burning</i>	<i>Disposal Instructions</i>
City Plastics Acrylic (1E-95 - 1E-97)	When heated to decomposition acrylic emits acid smoke and irritating fumes. Irritating to eyes, respiratory system and skin.	Fire fighters and others exposed to products of combustion should wear full protective clothing including self-contained breathing apparatus. Fire fighting equipment should be thoroughly decontaminated after use.	Landfill or <b>incineration</b> in compliance with federal, state, and local regulations.

Rita Corporation Paraffin Wax 130/135 (1E-98 - 1E-99)	Dense smoke may be generated while burning. Carbon monoxide, carbon dioxide and other oxides may be generated as products of combustion.	Not listed in document.	Remove to landfill or <b>incinerate</b> in accordance with federal, state and local regulations..
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### The Bhopal Precedent

The December 1984 incident involving accidental release of **isocyanate** gases in Bhopal, India, resulting in several thousand deaths, has caused worldwide awareness of manufacturing and community safety issues. **Several local circumstances recall the Bhopal precedent:**

1. The **hazmat** reporting and community preparedness program known as SARA Title III ("**TRI reporting**") was enacted **largely in response to the Bhopal incident** (1F-78). It is noteworthy that the **Columbia Forest - Chatham plant does not participate in that program**, even though it appears that there are several requirements for them to do so. Thus, there is no opportunity at present for the local community to get information about, and take normal preparatory precautions regarding, the chemicals and processes at the Columbia Forest plant;
2. As in Bhopal, the Columbia Forest Products - Chatham factory is **located very close to and upwind from residential neighborhoods and the center of town**. Residences are only a few hundred feet away, and receive directly and almost instantly the releases of the boiler stack and the UV finishing department's vents, both sources only recently having become a major and continuing problem for the nearby residents. The circumstances urgently need remediation, because the factory and town do not have a safety buffer of significant space for the diffusing of airborne chemicals emitted by the plant;
3. The Bhopal incident involved an accidental runaway leak of gases of the isocyanate/cyanide family. As discussed in detail above, the Columbia Forest - Chatham plant is apparently **releasing gases of the isocyanate/cyanide family**, as well as acrolein, from its boiler, on a continuing basis without any control or monitoring. We can only hope that the levels of release are not already causing permanent health damage to residents nearby, and ask that the process be stopped as quickly as possible.



## **Conclusion: Relief Needed, Without Delay**

By means of a loophole which perverts the apparent intent of the burning restrictions in Columbia Forest's air permit, **plastics are being combusted in large quantities**. The method of burning is obviously primitive, largely uncontrolled, and produces incomplete combustion evidenced by smoke and smells grossly troublesome to nearby inhabitants. The plastics being burned are known to have byproducts of combustion which are hazardous to human health and life. Therefore, **we fervently ask that the practice be ended immediately**.

Columbia Forest Products and its industrial predecessors on the site were **good neighbors** and a **source of pride to the town for decades**. Surely we can return to that situation of **safety and pleasant tranquility** through the application of **scientific good sense** and safe process engineering, rather than the present conditions of **high risk** and onerous burden to residents.

### **Further Note**

In the process of our preparing this document, we received information from plant manager David Abts that Columbia Forest Products intends to replace their present boiler during 2005. We have advised the DEQ South Central Regional Office - Lynchburg that we consider such a proposal to be controversial, in view of the above facts presented, and thus requiring a public hearing (see copy of letter, 1A-08).

#### References:

1A-01 – 1A-08	Correspondence
1B-01 – 1B-23	Operations Data
1C-01 – 1C-19	Permits
1D-01 – 1D-41	Product Advertising
1E-01 – 1E-99	Product Data Sheets
1F-01 – 1F-140	Published Documents
1G-01 – 1G-03	Regulations