

MACT Standard Questions

Note: The following is an annotated version of paragraph I.B.4 of a 7/21/2006 letter to Mr. Don Klima, Advisory Council on Historic Preservation, from Edwards, Gillispie, Mitchells, and Watson, with copies to numerous other involved parties including EPA, Virginia DEQ, and Virginia DHR.

Columbia Forest Products - Chatham is an EPA MACT standard facility (see “MACT Floor Facilities Key” at http://www.epa.gov/ttn/atw/coat/flatw/wbp_key.pdf) for hardwood plywood (SIC 2435). However, its emissions report to EPA (see references 5A-03, 5A-24 through 5A-28, and 5A29 through 5A-30) which is included in the MACT standard calculations states formaldehyde emissions which are approximately 1/81 the level reported to DEQ for the same period (see first row in table below), and methanol emissions which are approximately 1/19 the level reported to DEQ for the same period (see second row of table below). (For every year that we have seen, the plant’s emissions as published by EPA differ substantially from DEQ reports.) Additionally, a DEQ engineering analysis of the plant states that because of its (questionable) synthetic-minor status (see Attachment 3, “Synthetic Minor vs. Major Permit,” Gillispie, Mitchells, Watson, and Edwards to Mr. Allen Armistead, Virginia DEQ, 2/24/2006), the facility is exempt from compliance with the MACT standard. Thus there is an appearance of possible creation of unfair competitive advantage by means of strict MACT standards which could be required of other companies by EPA enforcement, but are not required of this MACT data-originating facility. Also conveniently for DEQ, this MACT discrepancy creates a theoretical local industrial recruiting advantage for other entities within this MACT industry grouping.

1999

<i>Substance:</i>	<i>EPA Reports:</i>	<i>Columbia Forest Report to DEQ:</i>	<i>DEQ Reports:</i>
Formaldehyde	0.04111873 tons (5A-03)	3.4 tons (presses) (5A-14) .0251 tons (boiler) (5A-11) .000427 tons (diesel) (5A-16)	3.35 tons (5A-18)
Methanol	0.27996 tons (5A-03)	5.3 tons (5A-14)	5.3 tons (5A-18)

CO (Carbon Monoxide)	6.8 tons (boiler) .02 tons (diesel) 6.817 tons (total) (5A-01, 5A-02)		6.8 tons (boiler) .34 tons (diesel) (5A-18)
NH3 (Ammonia)	0 (5A-01)		
NOx (Nitrous Oxide)	1.15 tons (boiler) .25 tons (diesel) 1.403 tons (total) (5A-01, 5A-02)	2.2 tons (boiler) (5A-10) 11.4 tons (diesel) (5A-15, 5A-16) 13.6 tons (total) (5A-04)	1.16 tons (boiler) 1.59 tons (diesel) (5A-18)
PM10 (Particulate matter, 10 micrometers or smaller)	2.01 tons (boiler) .4 tons (Clark baghouse) 3.42 tons (UV and baghouse) .02 tons (diesel) 1.78 tons (woodworking department) 7.633 tons (total) (5A-01, 5A-02)	3.9 tons (boiler) (5A-10) .4 tons (Clark baghouse) (5A-12) 3.4 tons (UV and baghouse) (5A-12) .8 tons (diesel) (5a-15) 1.8 tons (woodworking department) (5A-12) 10.3 tons (total) (5A-04, 5A-16)	2.02 tons (boiler) .4 tons (Clark baghouse) 3.42 tons (UV and baghouse) .11 tons (diesel) 1.78 tons (woodworking department) (5A-18)
PM2.5 (Particulate matter, 2.5 micrometers or smaller)	1.87 tons (boiler) .29 tons (Clark baghouse) 2.42 tons (UV and baghouse) .02 tons (diesel) 1.37 tons (woodworking department) 5.97 tons (total) (5A-01, 5A-02)	Not reported.	Not reported.

SO2 (Sulfur dioxide)	.26 tons (boiler) .18 tons (diesel) .436 tons (total) (5A-01, 5A-02)	.1 tons (boiler) (5A-10) .7 tons (diesel) (5A-15) .9 tons (total) (5A-04, 5A-16)	.26 tons (boiler) .10 tons (diesel) (5A-18)
VOC (Volatile organic compounds)	2.38 tons (boiler) 3.1 tons (UV and baghouse) 12.77 tons (presses) .01 tons (diesel) 18.262 tons (total) (5A-01, 5A-02)	.3 tons (boiler) (5A-10) 3.1 tons (UV and baghouse) (5A-13) 12.8 tons (presses) (5A-14) .1 tons (diesel) (5A-15) 16.4 tons (total) (5A-04, 5A-16)	2.38 tons (boiler) 3.1 tons (UV and baghouse) 12.77 tons (presses) .13 tons (diesel) (5A-18)
Naphthalene	.00000010740777490 tons (5A-03)	.0104 tons (boiler) (5A-11) .0000307 tons (diesel) (5A-16)	
Acrolein		.0000122 tons (boiler) (5A-11) .0000335 tons (diesel) (5A-16)	
Hydrochloric Acid	.00950511760553127 tons (5A-03)		