

Burning of "Treated" Wood

We are still unconvinced of the safety of large-scale burning of the long-chain polymers contained in the process wastes used as fuel at Columbia Forest Products - Chatham: urea-formaldehyde resin, polyurethane resin, and acrylic stains and finishes. (See our "Appeal of plastics-burning practice at Columbia Forest Products - Chatham," January 5, 2005; and Mr. Robert Burnley's reply of March 9, 2005.) Of especial concern to us are products of incomplete combustion of these materials, including hydrogen cyanide and isocyanates, acrolein, formaldehyde, ammonia, and carbon monoxide. That incomplete burning is presently occurring is obvious from the strong odors reminiscent of burning rubber, rotting fish, poultry manure, and creosote from the boiler stack; heavy, dark, smoke; and notable particle falls.

We acknowledge that the proposed permit includes the installation of a new boiler, the intent of which is to accomplish a more efficient burning practice than is currently occurring. However, as stated in our January 5, 2005 letter, we calculate that at least 500,000 pounds of these materials are currently being burned per year in the present 7.0 MMBtu/hr boiler. The proposed new 12.6 MMBtu boiler would burn at least 900,000 pounds of these materials per year, if its fuel throughput rises proportionally to its capacity increase. For a facility which DEQ has characterized in past records as having "poor" operation and maintenance practices, and has issued non-compliance letters for record-keeping failures, it seems to us that it is mandatory to institute safe, verifiable, and monitored procedures and controls due to the sharply increased risk represented by the new permit.

It is our understanding that most states categorize these types of waste fuels as "treated" wood (2A-02), whereas this permit seems to be considering the waste fuel as equivalent to "clean" wood (2A-02), as has occurred in previous permits for this facility. The burning of "treated" wood normally triggers more stringent permitting and operating requirements (2A-03).

It is our position that for safe operation of this boiler, utilizing as fuel the factory's process wastes which include glues and finishes, the permit should at the very least require continuous carbon monoxide monitoring for correlation with air toxics caused by incomplete burning. (See further discussion in section 4 and its attachment.)