

Unresolved Emissions Data Involving Resins

It is our understanding that the emissions numbers involving CR-595 LF resin are still unresolved, and that the quantities/emission factor involved may be significantly larger than previously reported (3C-02, 3C-03, 5A-01).

At the time of the July 19, 2005 meeting in Lynchburg, we were under the impression that CR-595 LF resin usage was being replaced by CR-601. We note that the December 19 letter (5A-02) references CR-605.

Obviously, we (the signers of this letter) do not have complete data on this, which is currently the largest component of the emissions acknowledged from the plant. As we have noted in section 3 of this letter, DEQ records indicate that this one emissions calculation is foundational to the entire permit.

Therefore we see it as imperative that this calculation and the reliability of its method and data must be established. For example, if the suppliers' data regarding methanol and formaldehyde content is to be used as the basis for the emissions calculations, and in light of the past difficulties in obtaining reliable reports, it appears evident to us that Columbia Forest Products should obtain vendor-certified data for each resin shipment received, as is required in paragraph 25f, page 7, of the permit draft.