



RECEIVED

JUN 19 2006

COMMONWEALTH of VIRGINIA **DEQ SCRO**

L. Preston Bryant, Jr.
Secretary of Natural Resources

Department of Historic Resources
2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.virginia.gov

June 14, 2006

David K. Paylor, Director
Virginia Department of Environmental Quality
P.O. Box 10009
Richmond, VA 23240

Re: Columbia Forest Products Draft Air Permit, Registration No. 30120
Town of Chatham, Pittsylvania County, Virginia
DHR File No. 2006-0144

Dear Mr. Paylor:

Thank you for your letter of May 22, 2006, providing us with information about the proposed changes at the Columbia Forest Products plywood manufacturing facility in Chatham. We would also like to express our sincere appreciation of the time you and your staff spent meeting with us on May 11 explaining the project details and the views of DEQ's Air Quality Division.

As you know, a number of historic property owners living within the Chatham Historic District or in the vicinity of the facility have expressed serious concerns with the noise and emission levels coming from Columbia Forest Products in recent years of its operation. Both increased noise and emissions have the potential to alter the setting of historic properties and, if associated with a covered permit action under consideration, would meet the criteria of adverse effect as defined in the regulations implementing the Section 106 review process. On the basis of the information shared at our meeting and presented in your letter, however, it appears that the pre-existing conditions may actually be improved by the proposed changes related to the permit action.

In particular, we note that DEQ anticipates that replacement of the facility's single existing boiler with a larger boiler will reduce the incidence of excessive smoke that has been observed from the current boiler. Further, we note that the current draft permit would establish the minimum stack height for the new boiler at an elevation of approximately 30 feet higher than the current stack. It is therefore predicted that the ground level concentration of emissions will be reduced due to the greater dispersion provided by the increase in stack height. In addition, although DEQ does not measure noise levels, it is felt that the greater combustion efficiency of the larger boiler will also serve to reduce the noise levels that have been the subject of complaint by the community. Finally, we note that you

Administrative Services
10 Courthouse Avenue
Petersburg, VA 23803
Tel: (804) 863-1624
Fax: (804) 862-9196

Capital Region Office
2801 Kensington Ave.
Richmond, VA 23221
Tel: (804) 367-2323
Fax: (804) 367-2391

Tidewater Region Office
14415 Old Courthouse Way, 2nd Floor
Newport News, VA 23608
Tel: (757) 886-2807
Fax: (757) 886-2805

Roanoke Region Office
1030 Penmar Ave., SE
Roanoke, VA 24013
Tel: (540) 857-7585
Fax: (540) 857-7588

Winchester Region Office
107 N. Kent Street, Suite 203
Winchester, VA 22601
Tel: (540) 722-3427
Fax: (540) 722-7555

have indicated that the permit action will not lead to increased plant operations or traffic that might alter noise, vibrations, or light levels in the vicinity of the plant.

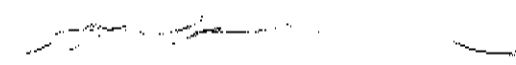
The proposed changes include a new building to house the new boiler and a new fuel storage silo. As the new construction will be located on the same plant property as the existing manufacturing site, we do not consider that any intact archaeological sites will be affected. Based on the photographs accompanying your letter, it also does not appear that there will be any significant changes related to visual effects from the new construction or from the increased stack height on the district or on other historic properties in the plant vicinity.

In summary, then, based on the information shared at our meeting and presented in your May 22 letter, it appears that the proposed changes may be an environmental benefit as relates to pre-existing conditions at the plant. Accordingly, our recommendation must be a finding of No Adverse Effect to historic properties. We do, however, recommend monitoring of noise, emission, light and vibration levels at Columbia Forest Products at intervals of six months and one year following completion of the proposed changes.

If I may comment on a matter that is beyond the limited scope of the current permit action, it is apparent that community relations are strained. I hope you will take the opportunity to encourage the company and residents to work together to address issues of concern.

Thank you for offering us the opportunity to comment. If you have any questions concerning our comments, please do not hesitate to contact me at (804) 367-2323, ext. 112; fax (804) 367-2391; e-mail ethel.eaton@dhr.virginia.gov.

Sincerely,



Kathleen S. Kilpatrick
Director

c: Allen Armistead, Virginia Department of Environmental Quality
John Eddins, Advisory Council on Historic Preservation
Patricia Haman, EPA Federal Preservation Officer
Joyce A. Howell, Region III Office of Enforcement, Compliance and Environmental Justice
Elizabeth Merritt, National Trust for Historic Preservation