

February 24, 2006

Mr. Allen Armistead
South Central Regional Office
Department of Environmental Quality
7705 Timberlake Road
Lynchburg, VA 24502

Re: Public Comment, Draft Permit, Columbia Forest Products - Chatham, Registration No. 30120, AIRS ID No. 51-143-00017.

Dear Mr. Armistead:

We, the undersigned, wish to express our appreciation for the July 19, 2005 meeting we had in Lynchburg with Robert Burnley, Director of Virginia DEQ, along with Thomas Henderson, David Miles, Craig Nicol, and Jed Brown of the South Central Regional DEQ. The comments below, with attached documents, are both a follow-up to that meeting and David Miles' December 19 written response, and pertinent to the Columbia Forest Products draft air permit currently published for public comment.

We request and will consider this letter and its attachments to be a portion of the public record associated with the review period of the permit, along with the following related documents already in your files: our "Appeal of plastics-burning practice at Columbia Forest Products - Chatham," January 5, 2005; and Mr. Burnley's reply of March 9, 2005.

As we discussed during the July 19 meeting, our concerns regarding Columbia Forest Products' proposed air permit modification are as follows:

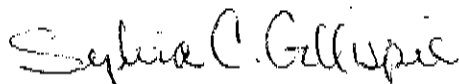
1. It appears to us that a new **boiler stack should be significantly taller** than either the present or the proposed stack. See attachment 1.
2. We are still unconvinced of the safety of large-scale burning of the long-chain polymers contained in the process wastes used as fuel: urea-formaldehyde resin, polyurethane resin, and acrylic stains and finishes. It is our understanding that **most states categorize these types of waste fuels as "treated wood,"** whereas this permit seems to continue considering the waste fuel as equivalent to clean wood. It is our position that for safe operation in this situation, the permit should at the very least require continuous **carbon monoxide monitoring** for correlation with air toxics caused by incomplete burning. See attachment 2.
3. We continue to **question the categorization** of this facility as a **synthetic minor source**, rather than as a major source. See attachment 3.

Three further issues have come to our attention since the July 19 meeting:

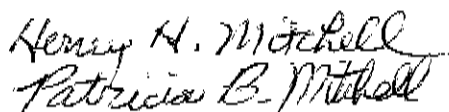
4. It appears to us that the draft permit continues the practice of using **AP-42 factors** for calculation of emissions. The AP-42 document itself states that **EPA does not recommend this practice**. See attachment 4.
5. It furthermore appears that the draft permit **does not address discrepancies in the present permit involving emissions from the application of glue**. These discrepancies would seem to indicate a higher current level of emissions than are included in both the present and the proposed permits. See attachment 5.
6. We are advised by the Virginia Department of Historic Resources that ours and other historic Chatham properties qualify for consultant status under **Section 106 of the National Historic Preservation Act, regarding atmospheric and noise conditions** involving Columbia Forest Products' equipment. We await further information and resolution of this question.

Thank you again for your attention to our concerns.

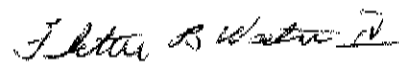
Yours truly,



Sylvia C. Gillispie
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Chatham, VA 24531-3703



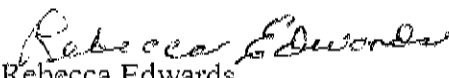
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Sarah E. Mitchell
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Attachments

Gillispie, Mitchells, Watson, Edwards
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Copies with attachments and references:

Ms. Samantha Fairchild, Director, Office of Enforcement, Compliance and Environmental
Justice, Mail Code 3EC00, 1650 Arch Street, Philadelphia, PA 19103-2029
The Hon. L. Preston Bryant, Jr., Secretary of Natural Resources, P. O. Box 1475,
Richmond, VA 23218-1475
Mr. David K. Paylor, Director, Virginia Department of Environmental Quality,
P. O. Box 10009, Richmond, VA 23240

Copies without attachments and references (please advise us if copies of the complete package are
needed):

Governor Tim Kaine, Patrick Henry Building, 3rd Floor, 1111 East Broad Street,
Richmond, VA 23219
Dr. Robert B. Stroube, State Health Commissioner, Virginia Department of Health,
P. O. Box 2448, Richmond, VA 23218-2248
The Hon. Charles Hawkins, Virginia Senate, P. O. Box 818, Chatham, VA 24531
The Hon. Robert Hurt, Virginia House of Delegates, P. O. Box 2, Chatham, VA 24531
The Hon. George Haley, Mayor, Town of Chatham, P. O. Box 370, Chatham, VA 24531