



COMMONWEALTH of VIRGINIA

Office of the Governor

P.O. Box 1475
Richmond, Virginia 23218

L. Preston Bryant, Jr.
Secretary of Natural Resources

July 20, 2006

The Honorable Robert Hurt
Member, Virginia House of Delegates
Post Office Box 2
Chatham, Virginia 24531

Dear Delegate Hurt:

Thank you for your recent letter regarding noise and air pollution issues associated with the operation of the Columbia Forest Products facility in Chatham. I am increasingly knowledgeable of this matter, as I have personally discussed it with Department of Environmental Quality (DEQ) officials on several occasions. I share your concern over the negative impact this facility is having on their neighbors and agree that the state's response to concerns over air pollution requires an appropriate level of evaluation.

In response to past complaints, DEQ has encouraged Columbia Forest Products to take steps to reduce noise and continues to advocate that the plant take all reasonable steps to minimize noise impact on the community. DEQ understands that the plant generates noise that is perceived by some in the community as having an adverse impact on their quality of life. However, noise pollution is handled at the local level, and DEQ has no authority to regulate noise. Therefore, I would urge Mr. and Ms. Mitchell to continue discussions with their local government as DEQ cannot compel the plant to take actions to resolve this issue.

DEQ's inquiry into the complaints and other concerns regarding air pollutant emissions from Columbia Forest Products has included ambient particulate matter monitoring, ambient monitoring for toxic pollutants, analysis of grab samples taken from the boiler and finishing department exhaust plume, atmospheric dispersion modeling, review of data from similar facilities, assessment of the hazardous constituents of the resins and finishes, and literature research. DEQ also responded with increased compliance assessment activity. This effort documented an emissions violation at the plant boiler which led to improvement to operational controls on the boiler in 2005. I understand that DEQ's observations since installation of these controls have not documented further violations and no specific incidents of excess emissions from the boiler have been reported to DEQ by the neighbors.

DEQ made repeated visits to the area attempting to experience and sample the pollution complaints reported by neighbors. These visits were either randomly timed surveillance or a response to specific reported incidents. Unfortunately, these efforts did not produce a visit that coincided with an excessive emissions event. As an alternative to ambient air sampling during an event, "grab samples" were taken from the exhaust plume of two sources at the plant that citizens identified as the suspected culprits of reported emissions episodes. The staff reasoned that collection of concentrated emission, taken in close proximity to the release point, might provide some insight into compounds present during an inundation episode. Results of these samples did not indicate concentrations in excess of a standard. As a follow-up to this sampling, DEQ implemented the ambient air monitoring initiative referenced in your letter.

From input provided by area citizens, DEQ understood that the periods of excessive emissions occurred routinely, almost on a daily basis. Given this representation, DEQ concluded that an air monitor set up to collect samples on a periodic schedule might provide information on pollutants present during an excessive emissions event and did agree to install such monitors. Over a period of approximately one month in October and November of 2004, ten 24-hour samples were collected. The citizens did request that they be allowed to activate this monitoring equipment. However, as a matter of general practice, DEQ does not allow citizens to operate monitoring equipment because we want to be able to assume data integrity should legal action be warranted.

The monitoring samples were analyzed using an established protocol for ozone precursors. The laboratory results showed a number of target compounds were not present above the detection level; therefore, no values for these compounds were included in the reported results. The samples were also screened for other compounds, and the chemicals of interest to the citizens were not identified in the samples. This monitoring data has been provided to the public.

Even though the monitoring initiative did not capture an excessive emissions event, valuable information was gained. The data provides an indication of whether the plant's routine operations are creating an ambient air quality issue. Residents had expressed concern that topography and metrological conditions do not provide for proper dispersion, and, therefore, even routine emissions could create air quality issues. The 2004 monitoring initiative provides data addressing this issue. The compounds quantified were evaluated for compliance with the state's toxic pollutant emission standards and provided to the Virginia Department of Health for their review. The results of this monitoring do not indicate any violations and was not a cause for concern of the Virginia Department of Health.

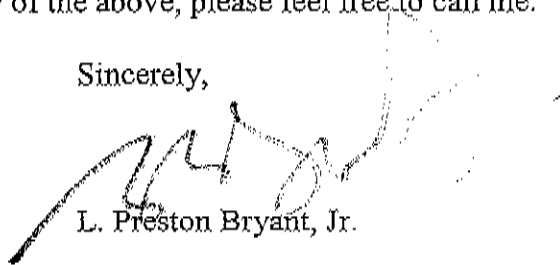
At this time, the benefit of additional monitoring is not apparent, and the monitoring equipment has been relocated to monitor other areas. DEQ is willing and able to take further grab samples if the need arises. Based on information from the residents and results of the 2004 monitoring initiative, grab sampling appears to be better suited to the CFP situation. DEQ has committed to continue conducting routine surveillance and periodic inspections of this facility. If these activities or further input from the community indicates a need, DEQ will initiate further

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review of CFP operations. In addition, DEQ continues to make observations of the boiler stack and will take further action if additional violations are noted.

If you would like to discuss any of the above, please feel free to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Preston Bryant, Jr.", written over a faint dotted grid background.

L. Preston Bryant, Jr.

LPBJr/cbd

c: David K. Paylor, Director,
Department of Environmental Quality