

The State of New Hampshire
Air Resources Commission
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DENNIS R. LUNDERVILLE
Technical Secretary

May 2, 1984

Mr. Charles M. Williams
Vice President
Environment & Energy
James River Corporation
P.O. Box 2218
Richmond, Virginia 23217

Dear Mr. Williams:

In accordance with the New Hampshire Code of Administrative Rules and pursuant to RSA 125-C:15 Enforcement, the following action is hereby taken against James River - Berlin/Cornham, Inc.:

Notice of Violation

Violations of primary national ambient air quality standards for total suspended particulates (TSP) were recorded at the Lancaster Street monitoring station in Berlin, New Hampshire in 1980 and have continued. These violations are primarily caused by mineral dust associated with heavy truck traffic in the unpaved James River Corporation woodyard. James River Corporation is therefore in violation of Section Air 303.01 of the New Hampshire Code of Administrative Rules.

Order of Abatement

Pursuant to RSA 125-C:15, the Director of the New Hampshire Air Resources Agency orders James River Corporation to comply with the following compliance schedule in order to demonstrate attainment of primary national ambient air quality standards. The identified control and maintenance measures shall be taken by James River Corporation for the reduction of fugitive particulate emissions:

1. Pave 0.55 miles of unpaved roadway in the woodyard and seed bare areas of the woodyard in the same vicinity by August 31, 1984 (roadways to be paved and bare areas to be seeded are described in the June 1, 1983 letter from James River Corporation to the New Hampshire Air Resources Agency and on pages 9 and 10 of the revised Berlin TSP Attainment Plan, May 1984).

2. During the 12-month period beginning on September 1, 1984, if and when elevated TSP concentrations are recorded, James River Corporation shall conduct investigations, prepare and submit reports according to the procedure on page 9 of the revised Berlin TSP Attainment Plan, May 1984. If exceedences of the primary TSP standards are recorded during this period, this program shall be continued into succeeding 12-month periods until such time that the then current primary standards for particulate matter are attained. If at any time during these periods, the New Hampshire Air Resources Agency determines that exceedences of primary standards would be reduced by the following action it shall be implemented: Pave an additional 0.1 miles of unpaved roadway in the woodyard (reference to roadways to be paved same as in paragraph 1. of this schedule).

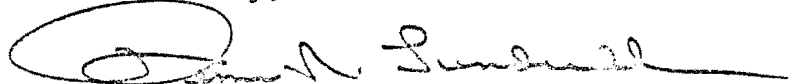
3. Maintenance of the paved and unpaved roadways and the seeded areas in the woodyard shall be performed according to the procedures in two letters submitted by James River Corporation to the New Hampshire Air Resources Agency on this subject (letters dated December 28, 1983 and February 1, 1984 are included as support documents to the revised Berlin TSP Attainment Plan, May 1984). The New Hampshire Air Resources Agency interprets these letters to mean that if the woodyard foreman observes any tracked, spilled, or otherwise deposited dirt on the woodyard pavement, which could reasonably be expected to result in unacceptable levels of fugitive particulate emissions, he will have the pavement swept and/or washed at least once per day in order to maintain the paved surface in a clean condition.

This Notice of Violation and Order of Abatement with defined compliance schedule shall be incorporated with the proposed 1984 Revision to the Plan for the Attainment of the Primary National Ambient Air Quality Standards for Total Suspended Particulates in Berlin, New Hampshire as required by the provisions of the Clean Air Act Amendments of 1977.

James River - Berlin/Gorham, Inc. shall not be deemed to be in violation of this Order in the event it complies with the compliance schedule herein and violations of the Primary National Ambient Air Quality Standards for Particulate Matter continue at the Lancaster Street monitoring station.

This order shall become final within (10) days of its issuance unless an appeal is filed with the New Hampshire Air Resources Commission prior to that time.

Sincerely,



Dennis R. Lunderville
Director
Air Resources Agency

DRL:gh

cc: G. Dana Bisbee, Esquire
Harley Laing, Director
Mr. Ray Danforth
Mr. Joseph Leclerc
Mr. Thomas Noel