



## BREDL Modeling Report Is Misleading, Inaccurate

### FIBROWATT EMISSIONS WILL MEET NORTH CAROLINA STANDARDS

When Fibrowatt first announced in 2007 that it was considering building a plant in Surry County, the Blue Ridge Environmental Defense League (BREDL) took a hard-line stance long before it knew much about Fibrowatt: "Not here, not there, not anywhere."

That is not a sustainable answer. Not for our economy, not for our environment and not for our energy needs.

Now, BREDL has issued an air modeling report designed to raise concerns about Fibrowatt's emissions. BREDL used two different modeling techniques (computer calculations of ground-level emissions) to estimate air quality impacts and draw conclusions. Based on the errors in this report, it is apparent that BREDL doesn't have the expertise to perform such an analysis. The report is not accurate or credible as it relies on faulty assumptions, omits key information and distorts the facts.

Here are a few examples of where BREDL's analysis is misleading and in some cases just plain wrong:

- BREDL based its evaluation on a simple air-dispersion model from the U.S. Environmental Protection Agency. This is a short-term screening model – a very conservative tool that is not appropriate for fully evaluating the impacts of our plants and determining if they meet North Carolina regulatory standards.
- The BREDL report fails to acknowledge that a Fibrowatt plant would meet North Carolina air toxics standards – even for chromium – using BREDL's conservative screening tool. The report did not include the full results of this screening model.
- BREDL used a second model, referred to as a "worst case spreadsheet," that is simply not valid for this type of analysis. The worst case spreadsheet appears to be intended for evaluating ground-level releases, not emissions from a stack. Since the emissions data used by BREDL in this model is for stack emissions, the results are irrelevant.
- The BREDL modeling does not rely on actual metals emissions from Fibrowatt's Minnesota plant, but uses conservative estimates that Fibrowatt made years ago when permitting the plant. Actual testing conducted for metals emissions at the Minnesota plant shows that emissions are 10 to 95 times lower than the levels used in the BREDL analysis. Using this actual testing data would show that each of the metals emissions – including arsenic and chromium – are more than 100 times below the applicable North Carolina standard.
- BREDL's analysis is based on a 55-megawatt plant. Fibrowatt expects to build a

smaller 40-megawatt plant in Surry County. Emissions and ambient impacts would be noticeably lower from a smaller plant.

Perhaps these mistakes are a result of BREDL's inexperience in performing complex air dispersion modeling and analysis. Or maybe BREDL manipulated the results to justify its opposition to Fibrowatt. Either way, the portrayal of Fibrowatt's air quality impacts is simply wrong.

We have offered to meet representatives of BREDL to show them where their conclusions are unsupported by the facts. They have not responded. When we attempted to explain these inaccuracies at BREDL meetings on May 11- 12, our representatives were not allowed to speak.

Fibrowatt is willing to be judged on the facts by fair-minded people. We will submit our plans to the environmental regulators who work for the State of North Carolina and we are confident that our emissions will meet North Carolina's air quality standards. It is important to remember that Fibrowatt cannot get a permit to operate until state regulators are completely satisfied that our plant will meet North Carolina's rigorous environmental standards.

When we submit our evidence to the state, we invite BREDL to do the same. Let the state judge who is right.

For further information on the Fibrowatt's review of the BREDL report, please contact Terry Walmsley at (267) 352-6589 or [terry.walmsley@fibrowattusa.com](mailto:terry.walmsley@fibrowattusa.com)

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