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Dana Doran - Professional Logging Contractors of Maine - DEP letter - July 26 2018

Dana A. Doran

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Loggers Standing Strong Since 1995

110 Sewall St., P.O. Box 1036
Augusta, ME 04332
Phone: 207.688.8195
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July 26, 2018

Mr. Jeffrey Crawford
Department of Environmental Protection
17 State House Station
Augusta, ME 04330

Dear Mr. Crawford:

I am writing to express the Professional Logging Contractors of Maine's (PLC) support for the Maine Department of Environmental Protection's (DEP) Clean Air Act § 176 A(a)(2) petition to the U.S. Environmental Protection Agency (EPA) to reassign parts of the state to more appropriate air quality regulatory requirements. The PLC is a trade association that represents logging and associated trucking contractors throughout the state of Maine. The PLC was formed in 1995 to give independent contractors a voice in a rapidly changing forest industry. As of 2014, logging and trucking contractors in Maine employed over 4,600 people directly and were indirectly responsible for the creation of an additional 3,000 jobs. This employment and the investments that contractors make contributed \$882 million into the state's economy.

The state of Maine has had great success in meeting Clean Air Act standards, especially in Maine's forest products industry, and we feel that this requested change will do no harm to our environment and will only serve to strengthen our forest products manufacturing facilities with a downstream impact upon the entire value chain.

As allowed under the Clean Air Act, DEP is petitioning the U.S. EPA to reassign parts of Maine to more appropriate air quality regulatory requirements. This will benefit Maine's economy in those areas requested by removing unnecessary, burdensome, and sometimes contradictory regulatory requirements.

This change will not hurt Maine's air quality. Maine has been and will continue to be in attainment with ozone National Ambient Air Quality Standards ("NAAQS") in those areas petitioned for removal, and emissions from Maine sources have a negligible impact on the ozone attainment status of any part of the OTR. The information presented in the petition justifies the exclusion of a portion of the State of Maine from the OTR.

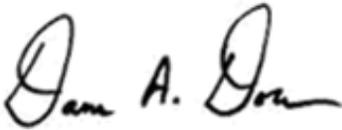
Nitrogen oxides (NO_x) and volatile organic compounds (VOC) are ozone precursor pollutants which contribute to the formation of ground-level ozone. EPA has previously granted Maine NO_x Waivers under the 1-hour and 8-hour ozone NAAQS, and Maine has still seen lower ozone levels and has been in attainment with the ozone NAAQS. DEP has demonstrated that further reductions of both NO_x and VOC emissions in Maine will not change Maine's attainment status or have any significant impact on ozone levels in the OTR outside of Maine.

This petition will keep Maine environmentally sound, but it will also make it more business friendly. Maine's economy will become more competitive with those in other states, while protecting the progress Maine has made over the last 25 years. Maine businesses in most of the state will no longer have to jump through regulatory hoops that add costs without providing any benefits.

Projects in the forest products industry, such as the Expera Old Town Mill and F.E. Wood – Natural Energy LLC might move forward as a result. Additionally, lumber mills currently operating could increase production as a result of the savings they would achieve by not having to purchase expensive offsets or the installation of control equipment. Finally, all of these projects would increase market share which would provide greater opportunities for loggers and truckers in rural Maine to sustain and growth their businesses.

Thank for you for providing the opportunity to hear from logging and trucking contractors regarding this petition. If I can answer any questions or provide information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Dana A. Doran". The signature is written in a cursive, flowing style.

Dana A. Doran
Executive Director