



# FRONT STREET SHIPYARD

August 8, 2018

Mr. Jeff Crawford  
Maine Department of Environmental Protection  
Bureau of Air Quality  
17 State House Station  
Augusta, ME 04333

Ozone Transportation Region Petition Comment

Mr. Crawford,

Front Street Shipyard firmly supports the proposed modifications regarding removal of certain sections of Maine from the Ozone Transportation Region. Several impactful regulations which serve to impede the growth and sustainability of Front Street Shipyard could be lifted if this petition is successful.

Provisions included in chapter 159 & 162 limit Front Street Shipyard and others within the boatbuilding community using classification criteria for adhesives and sealants based on substrate to which they are applied. Fiberglass substrates trigger VOC limits far lower than other substrates used in mass quantities within other industry.

Banned and/or exempt VOC products identified in the standards have also been based upon container size, encouraging the use of 100's of 16 ounce cans of Super 77 Spray Adhesive rather than the efficient, waste mitigating usage of 29 pound cylinders during production. Use of the cylinders provides a smooth, predictable application method that saves time and avoids problems associated



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with unavoidable manufacturing defects in 16 ounce cans which can lead to poor application and production down-time.

Super 77 Adhesive was not specifically designed for boatbuilding applications, but has come to the front as the only viable adhesive which avoids laminate contamination while providing perfect adhesion during the infusion process. This product will be an integral part of carbon fiber ferry production at Front Street Shipyard. We expect production on those ferries to commence in 2019.

Front Street Shipyard has tried multiple adhesive substitutes to Super 77 spray, but all have failed during trials despite significant R&D efforts within the 3M company.

We look forward to following the progress of this proposal, and we continue to appreciate your efforts to encourage growth and prosperity for Maine boatbuilding. Front Street Shipyard is prepared to provide continuing support for the efforts of the Maine Department of Environmental Protection in lifting some of these unnecessary regulations that have been place on our industry.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Clark", written in a cursive style.

Steve Clark  
Compliance & Facilities Manager