

Burke, Ruth A

From: Joshua E. Davidson <jdavidson@intlntimber.com>
Sent: Tuesday, July 31, 2018 9:00 AM
To: Crawford, Jeff S
Cc: Mercer, Paul; Cone, Marc A

Dear Mr. Crawford,

I'm writing to express International Timber Resources' (ITR) support for the State of Maine's proposed petition (petition) to the United States Environmental Protection Agency (EPA) for removal of certain areas of the State from the Ozone Transport Region (OTR).

ITR is an emerging leader in the timber industry, supplying round and sawn logs in addition to Biomass and wood chip processing and distribution. ITR is in the preliminary stages of developing a new wood pellet manufacturing plant to be located in the Northeast. ITR is currently evaluating potential sites in Maine for the project. The added cost of the OTR Lowest Achievable Emissions Rate (LAER) and offset requirements for NOx from power/heat sources and naturally occurring VOCs from wood drying would add capital and operating costs and uncertainty to such a project in Maine if the state remains in the OTR.

As the State correctly notes in its petition, the data and modeling analyses clearly demonstrate that Maine has been and continues to be in attainment with ozone NAAQS in those areas the state is petitioning for removal from the OTR. Accordingly, removal is warranted.

Conversely, as noted above, were Maine to remain in the OTR for those areas where it is in attainment, the economic impacts and other costs associated with the OTR's stringent requirements could serve as insurmountable barriers to ITR siting a new pellet manufacturing facility in Northern Maine.

The State's membership in the OTR thus puts Maine at a disadvantage to other forest products states and Canada when evaluating potential sites for a new pellet plant. Such impacts are unwarranted, particularly given that they correspond with no resultant environmental benefit.

ITR appreciates the opportunity to comment on the Department's proposal. If you have any questions, please don't hesitate to contact me.

Thank you,

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