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August 2, 2018

Mr. Jeff Crawford
Maine Department of Environmental Protection
Bureau of Air Quality
State House Station 17
Augusta, ME 04333-0017

Re: Clean Air Act §176A(a)(2) Petition to Reassign Parts of the State of Maine Out of the Ozone Transport Region

Please accept the following comments in support of the Department's petition to EPA to reassign parts of Maine, therefore removing them from the Ozone Transport Region (OTR).

Maine's air quality success is undeniable, and Verso believes regulatory requirements should reflect this success. By removing all but 10 coastal communities -- Kittery up to Old Orchard Beach, and Acadia National Park -- from the OTR, EPA will help strengthen Maine's economy in these areas by removing unnecessary, burdensome regulatory requirements without negatively impacting the environment of any area within the OTR.

- It is critical that environmental data and technical tools based on sound science are used to provide a thorough understanding of Maine source impacts on ozone formation within the OTR. The science (most of which is based on EPA technical analysis techniques) strongly supports reassignment as requested in this petition. Maine has documented the technical analysis justifying the removal of certain areas of the state from the OTR.

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- In the areas petitioned for removal, the state has been and continues to be in attainment with ozone National Ambient Air Quality Standards (NAAQS). – All five of them, including the most recent 2015 standard.
- The data clearly shows that emissions from Maine sources have negligible impact on the ozone attainment status of any part of the OTR.
- The petition demonstrates that further controls in Maine of both NO_x and VOC emissions have no significant impact on ozone levels in the OTR outside of Maine.
- The proposal does not remove or modify any existing control measures contained in the Maine State Implementation Plan (SIP). Controls on existing sources and facilities will not be relaxed upon removal of portions of the state from the OTR, ensuring that air quality does not degrade. This eliminates any potential for backsliding which is prohibited under provisions of the Clean Air Act.
- This action will bring greater regulatory certainty to facilities such as Verso's Androscoggin Mill. This will allow capital decisions and allocation of resources to be made with more clarity and certainty. It will better position the Androscoggin Mill to compete for capital investment dollars, both inside the company and externally, which will help ensure the longevity of the mill and its more than 500 well-paying jobs in this rural area of the state of Maine.
- Information in DEP's draft petition shows Maine has made huge reductions – about 70% – in stationary source VOCs and NO_x since 1990. Maine has done more than its part. There is no need to continue to impose the more onerous Lowest Achievable Emission Rate (LAER) and offsets on new investment. Best Available Control Technology (BACT) still applies – keeping appropriate controls on new sources and expansions.
- The current EPA standard considers protection of all - including children and the most vulnerable. The 2015 standard was promulgated by Obama Administration - known for being strong on environment.
- There is no basis for continuing to apply finite resources to something that is not a problem.



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- A strong economy and good jobs are also vital to public health and environmental protection. A strong forest products industry is important to the preservation and health of our forest.
- Removal of the northern regions of the state of Maine from the OTR would have no impact on existing sources in Maine and no impact on upwind state's obligations under the CAA. This action will impact only new source review requirements. Sources will still be required to meet Best Available Control Technology (BACT) which allows DEP to consider costs vs. benefits, instead of LAER which is prescriptive regardless of costs.
- The remaining areas will continue as part of the OTR, similar to how Virginia participates in the OTR.
- The CAA allows for such a petition under §176(A)(a)(2).

For the above stated reasons, Verso supports the DEP's petition to remove the portions of the state of Maine that have historically demonstrated compliance with the ozone standard(s), and as the science demonstrates, will continue to remain in compliance with the ozone standard(s).

Thank you for this opportunity to comment regarding this petition. Please contact me if you require additional information or have any questions regarding these comments.

Sincerely,



Kenneth Gallant
EHS Manager