



July 24, 2018

Jeffrey Crawford
Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333
jeff.s.crawford@maine.gov

Re: Clean Air Act Section 176A(a)(2) Ozone Transport Region Petition

Dear Mr. Crawford,

McCain Foods ISA, Inc. (McCain) respectfully submits these comments in support 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).

As the petition makes clear, the State has been and continues to be in attainment with ozone National Ambient Air Quality Standards (NAAQS) in those areas that the State is petitioning for removal from the OTR. In fact, Northern Maine, where McCain's Easton facility is located, has always been in attainment. Nevertheless, we continue to be subject to the burdensome requirements associated with the OTR.

The most onerous of these require new major stationary sources and major modifications of NO_x or VOCs to comply with Lowest Achievable Emission Rates (LAER) requirements, and subject such projects to offset requirements. What's more, LAER and offset requirements are applied wholesale to NO_x and VOCs throughout Maine, even in areas that meet the ozone standard. Accordingly, and without any consequent environmental benefit, membership in the OTR imposes these stringent requirements on major modifications that only add cost and impede investment in the State. McCain, like other facilities in attainment areas, must incur OTR-related costs were we to modify existing boilers or expand our operations to meet ever-changing consumer food demands. This puts us at a great disadvantage in attracting capital investment – a disadvantage that is not warranted given the great strides Maine has made in becoming the "success story" the petition describes.

The technical analysis set forth in the petition show that Maine has consistently met the ozone standard and that emissions in Maine neither significantly nor adversely impact any other area in the OTR. This, combined with the negative economic impact the State suffers in remaining in the OTR, merit granting of the petition.

Thank you,

A handwritten signature in black ink that reads "Douglas Hahn".

Douglas H. Hahn, PE
Director of Environmental Engineering
(920)997-2672