

Burke, Ruth A

From: Joe Lynch <lynchj1624@gmail.com>
Sent: Thursday, August 09, 2018 3:34 PM
To: DEP Rule Comments
Subject: OTR Comments

I am commenting in favor of the State's petition to remove portions of the State from the OTR.

My name is Joe Lynch. I do not represent any organization but am commenting on the State of Maine's petition to remove most of the State from the OTR as an individual. I have over 40 years of Environmental experience working for several Pulp and Paper companies in the State including my hometown of Millinocket. During that time, I have seen firsthand the effects of being in the OTR have had on the economy and health in most of rural Maine. There once were six pulp and paper mills on the Penobscot River. Now there are none. There are many reasons why and no one reason is wholly to blame. But, when companies have to install costly pollution control equipment to not solve a problem in Southern Maine, it makes them reconsider the options and what's best for the company. A good example is when Great Northern had to spend \$5,000,000 to put NOx controls on their boilers which did nothing to solve the ozone problem in Southern Maine. That money could have been better spent on upgrades in the mills to make them more competitive. Or the mill in Madawaska shutting their boiler down and building one on the other side of the border/river into Canada resulting in lost jobs in Maine.

It is especially imperative that this petition goes forward when it comes to VOC emissions. When a mere 1% of the VOC emissions in Maine come from human activities and most of that 1% comes from motor vehicles, it seems ludicrous that we need to put environmental roadblocks to lumber mills, pellet mills, boat builders, paper mills, and others due to the fact that the EPA put the whole State into the OTR. The EPA put procedures in place that allows for the States to be remove, or more importantly portions of the State, from the OTR if the State can clearly demonstrate that it is not contributing to the ozone problem in the OTR. The State has clearly demonstrated this, with the exception of the few coastal areas in Southern Maine and Acadia National Park.

Some will or have argued that if this petition goes through, other States will follow. This argument assumes that the states to our South and West can demonstrate that they do not have an impact on any areas in the OTR. This is highly unlikely since ozone is a transportation issue and their emissions are being transported to the North and East impacting Maine and other states in the OTR.

Others will argue that this action could allow industry in Maine to increase emissions indiscriminately. This also is not a valid argument. In order to amend a sources air license to allow for increased production or to build a new mill the source must show that the proposed changes will meet BPT/BACT. This will ensure that the source will have sufficient controls installed to protect the environment without the added cost of obtaining offsets, which are very rare and very costly or having to install LAER which could be cost prohibited.

In closing, I strongly urge the State to go forward with removing most of the State from the OTR. It is way past time. We do not need to be hindering facilities in Maine from expanding or even construction of new facilities that employ Mainers to not solve a problem.

Sincerely,

Joe Lynch
Retired Environmental Engineer