



24 Hall Hill Road
Dixfield, ME
04224

July 25, 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,

On behalf of Irving Forest Products, Inc. (Irving), and our two facilities in Dixfield and Ashland that directly employ over 400 people, I am writing in support of the State of Maine's proposed 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 Maine Department of Environmental Protection is well aware, 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. This is due, at least in part, to the strong environmental achievements of the State's business and industrial sectors, who have worked tirelessly to reduce their environmental impact. Maine is, indeed, an ozone success story, as evidenced by the technical data that the State included with its proposed petition.

The technical data not only justify removal of areas of the State from the OTR, but also confirm as unnecessary the OTR-related requirements that hinder economic investment and development in Maine. Irving is concerned with the State remaining in the OTR, and with its sawmills facing the OTR's more onerous NOX and VOC requirements should they wish to expand production, particularly given that Irving sawmills are located in Northern and Western Maine. These portions of the State that have always been in attainment of the NAAQS and does not impact nonattainment areas. Nevertheless, membership in the OTR imposes such stringent requirements on major modifications that only add cost and impede investment in our Maine sawmills without any corresponding positive environmental impact. Such added costs also reduce the competitiveness of our Maine sawmills when compared with our competitors in the U.S. as well as just across the border in Canada. This disadvantage is not justified when our sawmills do not contribute to an ozone problem.

The potential impacts on our business are very real and not merely hypothetical. In 2013, we obtained an air license permitting an increase in wood drying kiln throughput at our Dixfield facility. We had to propose and accept enforceable production limits to ensure the more reasonable requirements of Best Available Control Technology (BACT) applied to the project, instead of the more onerous, and potentially project-breaking, requirements for offsets and Lowest Achievable Emissions Rate (LAER) that apply in northern Maine due solely to Maine's inclusion in the OTR. These production limits prevent the facility from operating at maximum rates which, obviously, has adverse economic impacts on the facility.

Maine's success in consistently meeting the ozone standard and in showing that emissions in Maine neither significantly nor adversely impact any other area in the OTR warrant its removal from the OTR. It is irrational to remain in the OTR when doing so could negatively impact economic investment and development in this State.

Thank you,

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right.

Jerome Pelletier
Vice President - Sawmills Division
Irving Forest Products Limited