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Speech in favor of opting out of the Ozone Transport Region
By James L. Robbins

Good afternoon. My name is James L. Robbins Sr. My family owns and runs Robbins Lumber in Searsmont, Maine. We employ 110 people. We have been in business since 1881. My three children run the company now. They are the fifth generation to run the mill and with a sixth generation coming along I hope that overly strict environmental regulations will not drive them out of business. We are currently building an 8.5 megawatt renewable energy power plant powered by clean wood which will provide power for 7500 homes and provide a market for our mill residuals and biomass from the loggers.

It is hard to do business in Maine. In Maine the cost of doing business is 8.5% above the national average making us in the top 10 in costs. We are 11th highest in health care costs. We have some of the highest energy costs in the country. We have the 3rd highest taxes in the country.

Maine needs more foundational jobs like manufacturing. Our manufacturing jobs are down 53% for a loss of 29,000 jobs during the period from 2000-2013. Production jobs have dropped from 50% to 14% of all jobs.

Maine has to attract jobs and investment- and keep the ones that we now have. But, we can't do this if we have to live with stricter environmental laws than other parts of this country and Canada that we have to compete with.

We need biomass boilers to power our mills, to provide a market for our residual products and prevent them from going to landfills. They also provide a market for our low grade trees and thinnings and thereby improving the health of our forests.

To compete in this market it is absolutely essential that we run dry kilns so we can supply dry lumber all year around. There is no practical way to control naturally occurring VOCs emitted from dry kilns. VOCs from dry kilns shouldn't be a problem since the abundant Maine forests naturally produce many times more natural VOCs than the mills do. We are being punished for producing an infinitesimal amount of VOCs by processing those same trees.

Keep in mind that we are producing lumber for the housing market. When houses are built of wood a huge amount of carbon is being stored which helps the environment plus the new regenerating forest produces more oxygen than an old growth forest.

We could burn the VOCs coming from our kilns by installing very expensive equipment to meet the LAER requirement. However, this equipment would cost over a million dollars to purchase plus approximately a half a million dollars a year to run. This equipment would burn either propane or natural gas which in turn would emit pollutants like NOx, CO2 (a greenhouse pollutant) and particulate matter. The net effect would be that it would meet the LAER requirements but would actually create more localized pollution and ozone contributing NOx than we do now. I understand that the mixing of VOCs, NOx, and sunlight create ozone and that in Maine NOx is the limiting factor. Thus, requiring fuel intensive controls to control VOCs will have the net effect of increasing ozone in Maine rather than reducing it. This is crazy.

By opting out of the OTR we can use a more common sense approach, which would create fewer VOCs by using the Best Available Control Technology (BACT). This will use rules that are the most effective to protect the environment while at the same time consider the economic feasibility and all other factors such as considering all pollutants impacts to best protect the environment.

The white pine inventory is up in Maine. We may want to expand our production. With the current laws we may well not be able to because with the restrictions it will not be economically feasible.

The VOCs produced naturally in our forests far exceeds what our mills produce. We can do nothing about that. We need healthy forests for a healthy industry.- and ironically healthy forests produce more VOCs. So driving our mills out of business with needless OTR restrictions will also make our forests less healthy- and I don't think any of us want to see that happen.

Our largest manufacturers are also our largest landowners. If you drive out the manufacturers you may also cause them to sell off their land to developers – especially if they have no market for their wood.

Maine has been in compliance with Ozone requirements since 2007. The goal has been attained- why continue to punish ourselves ? We should reward success.

The DEP facts show that ozone is not a problem in the proposed removal areas. Maintaining OTR standards with the application of LAER to control VOCs in many instances drives fuel intensive controls that generate NOx, CO2, and Particulate Matter which have more detrimental effects than the more balanced BACT requirements that can consider all environmental and economic impacts.

I would hope that the decision on whether to remove parts of Maine from the OTR would be based on facts- not the emotional fear mongering from environmental groups.

Thank you.

James L. Robbins
Searsmont, Maine