



P.O. Box 160 66 Fontaine Road Stratton, Maine 04982

July 30, 2018

Jeff Crawford
Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333

Dear Mr. Crawford,

I am Allan Ryder, President of Timber Resource Group (TRG) which is the log procurement division of Stratton Lumber Inc., a spruce/fir dimensional lumber mill located in Stratton, Maine.

Stratton Lumber employs 85+ employees at the mill in Franklin County.

At our facility we have the sawmill, 3 dry kilns, wood fired biomass boiler and planer mill.

In Stratton we saw approximately 75 million board feet of spruce/fir dimensional lumber each year and have plans to increase production.

We have invested over \$12 million dollars into our facility over the past 5 years and more significant capital improvements are being made into the mill as I speak today.

Stratton Lumber buys spruce/fir logs from about 100 Maine log suppliers including loggers, landowners, land managers, truckers and others.

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Spruce and fir logs contain naturally occurring volatile organic compounds (VOC's), such as terpenes. When a tree dies in the woods these terpenes are emitted. When a log is sawn in a sawmill; the waste wood chipped in a sawmill (or in the woods) and when the sawn lumber is dried – it also emits terpenes; but a faster rate. The VOC's emitted from the forests in the State of Maine (which is 89% forested) far exceed the VOC's emitted for all of Maine's industry.

Stratton lumber burns sawdust, shavings and other waster wood from our sawmilling and planning process in our biomass boiler. This produces steam to heat the kilns to dry the lumber as well as heat our buildings.

The end of 2017 Stratton made a dry kiln modification utilizing new, innovative technology and we have the first continuous dry kiln in the northeast. With our recent upgrades to our kiln, we have accepted production limits to avoid triggering the more difficult and burdensome Lowest Achievable Emission Rates (LAER).

Our new, upgraded dry kiln has a large capacity for throughput of lumber. If we were to increase our throughput over our current permits, this would make the project fall into the MAJOR Modification category. That would mean Stratton Lumber would have to purchase VOC offset credits (if they were available) at a very high cost – likely millions of dollars.

With Maine opting out of the Ozone Transportation Zone (OTR), the requirement of a small company like Stratton Lumber would not be required to purchase VOC offset credits; and therefore, making investing more into the business more realistic.

With Maine opting out of the Ozone Transport Region (OTR), the Maine Department of Environmental Protection (DEP) can then apply for Best Available Control Technically (BACT) emissions controls to a new (or modified) biomass boiler; instead of using Lowest Achievable Emission Rates (LAER) controls.

Lowest Achievable Emission Rates (LAER) are difficult and burdensome and any investment into a new (or modified) biomass boiler at our sawmill facility (including the biomass boiler and dry kilns) could also trigger the need for us to get NOx or Volatile Organic Compounds (VOC's) offsets at a significant added cost.

If we at Stratton Lumber cannot achieve our maximum production rates, it will make us less productive, less competitive and the less we wish to invest in the future.

Stratton Lumber has grown from 65 employees last year to 85+ employees this year and expect to grow our business in the future years.

Stratton Lumber and Timber Resource Group are members of the Maine Forest Products Council.

We go on record to support the Maine Forest Products Council's position to support the State of Maine, Department of Environmental Protection's for the Ozone Transport Region Petition, Maine's Ozone Success Story – for the removal of certain areas of the State of Maine from the Ozone Transport Region (OTR).

This would give Maine a level playing field with the rest of the country and allow forest products businesses in Maine to be competitive and stay competitive.

Sincerely,

A handwritten signature in black ink that reads "Allan C. Ryder". The signature is written in a cursive, flowing style.

Allan Ryder
President, Timber Resource Group
Stratton Lumber Company