

August 7, 2018

Via E-mail and U.S. Mail

Jeffrey Crawford
Policy Development Specialist
Maine Department of Environmental Protection
Bureau of Air Quality
17 State House Station
Augusta, ME 04333

Re: Comments in Support of Maine's Petition for Removal from the Ozone Transport Region

Dear Mr. Crawford:

Ameresco, Inc. ("Ameresco") is providing the following comments in support of Maine's petition to remove parts of the State from the Ozone Transport Region (OTR).

Ameresco is a leading independent provider of comprehensive energy solutions including renewable energy, asset operations and maintenance, energy efficiency among many other services for facilities across North America and the United Kingdom. Ameresco has an office on Danforth Street in Portland, Maine that encompasses a strong engineering group from Maine. In addition, the office is the epi-center for our portfolio management, overseeing over 30 energy producing plants across the United States.

Maine's inclusion in the OTR imposes additional regulatory requirements that hurt businesses by increasing costs and eliminating operational flexibility, without a commensurate environmental benefit. Maine is and will continue to be in attainment with the applicable ozone National Ambient Air Quality Standards, and removal of parts of Maine from the OTR will not adversely impact Maine's continued compliance with applicable air quality standards. Additionally, emissions from Maine sources do not cause or contribute to non-attainment in any other State. The petition is supported by a substantial amount of data and sound science, and removal of parts of Maine from the OTR will not compromise air quality in Maine or elsewhere.

Granting the petition will, however, help Maine businesses and residents by providing greater economic opportunity and eliminating the competitive disadvantage that results from inclusion in the OTR. For example, due to Maine's inclusion in the OTR, new or modified



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facilities may need to install control technologies to meet the stringent requirement of Lowest Achievable Emission Rate set forth in the Clean Air Act, and to obtain offsets for increased emissions of VOCs and NOx. The costs associated with meeting these requirements are significant, sometimes time cost-prohibitive, and are a disincentive to investment in the State. Additionally, compliance with these standards sometimes has the unintended consequence of increasing emissions of other pollutants that may be of more concern in Maine. Finally, Maine has in place a comprehensive air regulatory program that requires new and modified sources to demonstrate compliance with Best Available Control Technology, thereby ensuring that facilities continue to control emissions, but allowing businesses the flexibility and opportunity to expand and grow without adversely impacting regional air quality.

Imposing additional regulatory burdens on Maine businesses and sources places them at a competitive disadvantage and is not necessary to achieve the objectives of the Clean Air Act or to maintain Maine's air quality. We appreciate the work the State has done to analyze this issue and strike the appropriate balance between controlling air emissions and allowing businesses the opportunity to succeed and provide critically needed jobs for Maine residents.

Thank you for consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "George P. Sakellaris". The signature is fluid and cursive, with a long horizontal stroke at the end.

George Sakellaris
Chief Executive Officer