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**Sent:** Sunday, October 18, 2020 5:26 PM  
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**Subject:** Re: Chapter 100 Ozone Transport Region

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To the Board"

I submit that no standards, nor geographic areas for ozone containment can be reduced in the State of Maine.

Prominent in this regulatory analysis is the issue of the economic "hurdles" created by including the entire state of Maine: :The statewide nonattainment NSR requirements in Maine have imposed additional regulatory hurdles for those wanting to invest in new and upgraded facilities and have failed to provide the intended environmental benefits. The cost of emission offsets, in conjunction with the requirement for the application of the most stringent emissions controls regardless of cost or disbenefits<sup>11</sup> is unwarranted for those areas of Maine that do not significantly impact any non-attainment areas

[https://www.epa.gov/sites/production/files/2020-06/documents/maine\\_section\\_176a\\_petition\\_2.6.20.pdf](https://www.epa.gov/sites/production/files/2020-06/documents/maine_section_176a_petition_2.6.20.pdf)

Add consideration of section 1 as below: that no motor vehicle emissions inspection programs is provided in any area of Maine with less than a population of 100,000. Daily "populations" in most Maine areas easily increase to near that amount, due to passing, but not year-round residential traffic. These substantial daily/seasonal increases in emissions must be accounted for.

Too, the monitoring stations are inadequate in number and placement. And, there is no allowance for placement when air quality - including ozone levels drops to the almost unbreathable. I know. I have asked. In addition, there is currently an influx of population to Maine. Areas outside those proposed for reductions must take that increase into effect, as well as the influx of new business development proposals that the state is witnessing.

And, let us not forget the proposed CMP line, with the forest destruction, (and air pollutant mitigation), that would accompany it.

In Maine, all areas of the state are effectively treated as "moderate" ozone nonattainment areas and are required to implement the following CAA-mandated controls:

- 1) Enhanced motor vehicle emissions inspection program in metropolitan statistical areas (or part thereof) with a population of 100,000 or more;
- 2) Reasonably available control technology with respect to all sources of volatile organic compounds in the State covered by a control techniques guideline;
- 3) Statewide Stage II vapor recovery control program or comparable measures;
- 4) Reasonably available control technology for major sources of VOCs and NO<sub>x</sub>; and
- 5) Nonattainment new source review (NSR).<sup>2</sup>

Now is not the time to become lax. Rather, it is vital to ensure comprehensiveness in every approach to the health and well-being of the population of Maine.

Sincerely,  
Margaret Trout  
Rockland