



July 24, 2018

Mr. Jeffrey Crawford

Maine Department of Environmental Protection

17 State House Station

Augusta, ME

04333

RE: Comments in Response to DEP Petition to Opt-Out of Ozone Transport Region

Dear Mr. Crawford:

Louisiana Pacific's Houlton Mill (LP) welcomes this opportunity to submit comments on the Petition to Opt-Out of Oxone Transport Region (OTR). LP Houlton is a wood products manufacturing facility located in New Limerick in Aroostook County. LP Houlton manufacturers oriented strand board and laminated strand lumber for the housing industry, directly employs 167 full time employees, and purchased 17.5 million dollars in wood fiber sourced from 75 loggers in 2017.

LP strongly supports the DEP's efforts to create common sense rulemaking and opt-out of the OTR in areas where Maine is in compliance with National Ambient Air Quality Standards. The proposed Opt-Out does not change or decrease any existing air quality control requirement at our mill or other facilities. By opting out of the OTR, the DEP would then have the option to apply the Best Available Control Technology (BACT) emissions controls to new or modified equipment, instead of Lowest Achievable Emission Rate (LAER) controls. For BACT, the DEP determines the most appropriate level of control considering all factors, including the economic feasibility of controls and the environmental costs and benefits. Whereas under LAER, DEP cannot consider these factors and can only consider what is the lowest emission rate for that piece of equipment whether this makes environmental and economic sense or not. LAER requires the most stringent controls regardless of cost or environmental benefit.

For the wood product industry sector, EPA has already developed and Maine has adopted Maximum Achievable Control Technology (MACT) standards. This regulation, established VOC emission limits that are based on the average of the top 12% best performing similar plants in the county. It should be sufficient that Maine's facilities are held to maximum achievable standards, which should put Maine facilities on a competitive level with counterparts in other states. Holding facilities to even higher and more expensive levels of LAER and costly emission offsets will put Houlton at a competitive disadvantage and



renders us a less attractive target for investment than our counterparts in other states or Canada.

Louisiana Pacific is a multi-national and multi-state corporation. Houlton has to compete for limited capital and investment resources with sister mills in Nova Scotia, Manitoba, British Columbia, Michigan, Wisconsin, Minnesota, North Carolina, Alabama, and Texas. By requiring more stringent VOC and NOx control requirements than are necessary to maintain Maine's already excellent air quality discourages capital investments for energy efficiency or expansion. Maine industries already have the economic burden of high energy and high transportation costs. Adding additional barriers to site new businesses ventures, expand existing facilities, or invest in energy efficiency pollution prevention projects is not in Maine's best interest.

Sincerely,

Bruce Avery
P.P.

Bruce Avery
Plant Manager
LP Houlton