



PORTLAND PIPE LINE CORPORATION
Safety, Environment, Customer, Community

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VIA U.S. POSTAL MAIL AND ELECTRONIC MAIL

July 25, 2018

Mr. Jeffrey Crawford
Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333
jeff.s.crawford@maine.gov

Re: Clean Air Act Section 176A(a)(2) Ozone Transport Region Petition

Dear Mr. Crawford,

Portland Pipe Line Corporation (PPLC) would like to express its support for the State of Maine's proposed petition (petition) to the United States Environmental Protection Agency (EPA) for removal of certain areas of the State from the Ozone Transport Region (OTR).

As the State correctly notes in its petition, Maine's attainment status for the ozone National Ambient Air Quality Standards (NAAQS) is a success story. Maine has made great strides in reducing emissions of pollutants that contribute to the formation of ozone, as demonstrated by Maine's insignificant contribution to ozone levels at every monitoring site in OTR states. The technical analysis set forth in the petition clearly demonstrates that Maine has been and continues to be in attainment with ozone NAAQS in those areas the state is petitioning for removal from the OTR. Accordingly, removal is warranted.

Conversely, were Maine to remain in the OTR for those areas where it is in attainment, the economic impacts and other costs associated with the OTR's stringent requirements may impede new development or the expansion of existing facilities within the State. For example, PPLC has valuable infrastructure at its facility in South Portland – infrastructure that the company may wish to use to meet changing energy demands. Onerous NOX and VOC requirements for areas within the OTR could impose significant additional cost should PPLC wish to change its production as energy markets change. So too could a major modification of the facility trigger much more stringent control requirements through Lowest Achievable Emissions Rate (LAER) requirements and the need to obtain offsets. Such requirements could serve as insurmountable barriers to modifications at our facility, such as tank changes and product changes, leading to inflexibility in a market that demands we be nimble.

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The State's membership in the OTR thus puts PPLC and other Maine businesses at a disadvantage. Such impacts are unwarranted, particularly given that they correspond with no resultant environmental benefit.

Unfortunately, I am unable to attend the hearing on this matter scheduled for July 30, 2018. Dixon Pike, of Pierce Atwood LLP, will be present and will represent PPLC's support of the petition.

Thank you,



Thomas A. Hardison
President & CEO
Portland Pipe Line Corporation

cc: K. P. Brown, Portland Pipe Line Corporation
L. A. Gilbreath, Pierce Atwood LLP
D. P. Pike, Pierce Atwood LLP