

August 8, 2018

Maine Department of Environmental Protection
Jeffrey Crawford
17 State House Station
Augusta, ME 04333
207-287-7647

RE: Letter of Support: Petition to Reassign certain parts of the State under the Ozone Transport Region
Clean Air Act §176(a)(2) Petition Summary: Maine's Ozone Success Story

Dear Mr. Crawford:

Cianbro Fabrication and Coatings Corporation (CFCC) has operated a fabrication and coatings operation in Pittsfield, Maine since 1990. During this time the facility has established a business culture which seeks to both comply and engrain the environmental requirements of the operations into the culture of the work we do. The neighborhood we do business in, is the neighborhood our team members live and raise families within. The well being of our team is the utmost importance to us and extends into the communities we operate within.


CFCC supports the reassignment of certain portions of Maine from the Ozone Transport Region as part of that commitment to Maine and our people. The operations at CFCC do generate VOC's and NOx which are known Ozone contributors. However, through existing operational controls and air quality license requirements to limit high VOC coatings and implement more efficient spray techniques, those emissions are already well below permitted limits. As stated in the petition, these limits and control measures will not be lessened through removal of certain portions of Maine from the OTR. The current standards are efficient, manageable and meaningful to the operation as well as those charged with implementing the requirements effectively with the ambition to build their business and community all by effectively maintaining air quality standards. The current standards also allow for respective business operations to effectively improve their process to reduce emissions within the means of their operation and not through prescribed technologies which will be the only option should a VOC producing operation wish to grow within Maine.

Should the OTR petition be denied, CFCC, and many other productive, efficient operations within Maine will be subject to additional requirements to control an emission that is not contributing to any air quality deficiency within Maine or the OTR as a whole. The data provided with the petition speaks for itself. These additional control techniques which would be required by LAER standards of a growing VOC producing operation in Maine, are additive, and

provide no benefit as standards are already being met. These techniques will add significant cost. For a company such as CFCC, who performs manufacturing work for contractors across the country, could result in a forced reduction in production or refusal of work contracts requiring a higher VOC coating in an attempt to stay below the threshold for implementation of the LAER methods. Not only does this hurt the business climate within the state, it also, very ironically, limits the intent of the LAER methodology. If a business is already meeting standards required by air quality permits, and would continue to do so through increased production without LAER or added constraints on emissions required through the OTR, there is no added benefit of a further reduction in Ozone contributing emissions. In short, business loses and air quality is none the better. The intent of the additive implementation of LAER standards is flawed and does not fit for a downwind state such as Maine where the majority of the region is in attainment. Removal of certain regions from the OTR will likely promote implementation of better technology for air emissions control in current facilities who are poised to grow vs forced implementation which will de-incentivise growth and promote the status quo.

Very truly yours,

COMPANY



Name JACK KLIMP
Title VP/GM CFCC