

July 27, 2018

Mr. Jeffrey Crawford
Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333

Dear Mr. Crawford:

CES, Inc. (CES) is submitting this letter to document our support for the Maine Department of Environmental Protection's petition to remove much of Maine from the Ozone Transport Region (OTR).

Our understanding is that approval of this petition will remove sections of Maine from the OTR, but not the entirety of the State. Although the entirety of Maine was designated to be in attainment based on the 2008 and 2015 Designated Attainment maps, the Department has taken a conservative approach and is only requesting removal of those portions of Maine that are least likely to be impacted by other areas of the OTR.

Maine being included in the OTR has directly affected CES' clients across a number of markets and industries. Business sectors that have been directly affected include transportation, furniture manufacture, oil terminals, and forest product entities including lumber and wood pellet manufacture.

The economically prohibitive nature of being in the OTR has caused CES clients throughout the State of Maine to artificially limit the growth of their business or in other cases remove from consideration installation of new facilities. Reduction in the regulatory burdens will result in an economic benefit to many rural areas in the State. CES commercial and industrial clients will be able to expand their production, and consequently realize increased economic growth by operating at full potential. Removing the cost of purchasing off-set credits, capital costs associated with purchase of add-on control devices required by Lowest Achievable Emissions Rate (LAER), and additional operational costs is likely to spur economic activity in regions of Maine that need it most.

As stated in the State's petition, CES agrees that the anticipated economic benefit to Maine's businesses will not come at the cost of impacting our environment. The Maine Department of Environmental Protection has licensing mechanisms in place to ensure that, even with removal of the LAER requirements, that our ambient air quality will not be significantly reduced. All licensed facilities will continue to be required to provide Best Available Control Technologies for their emissions sources, thereby controlling emissions and reducing impacts to the environment. Good science supports the assertion that Maine's industrial and manufacturing facilities are not present

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in sufficient quantity or density to produce sufficient pollutant emissions to significantly affect the overall ambient air quality. In addition, Maine facilities are not located in a geographic position to affect other areas of the OTR.

CES is pleased to provide our support for this petition and is hopeful that we will soon see the improvements to our State.

Sincerely,
CES, Inc.

A handwritten signature in blue ink, appearing to read "K. Sullivan".

Kyle S. Sullivan
Senior Project Scientist

KSS/JAP/cmc

A handwritten signature in blue ink, appearing to read "John A. Pond".

John A. Pond
Executive Vice President
Environmental Division Director