

Collin " Scott" Beal  
Baileyville

Good Morning Senator Brenner, Representative Tucker and members of the Environment and Natural Resources Committee.

My name is Scott Beal. I am the Environmental and Security Manager for Woodland Pulp LLC in Baileyville, Maine.

I write to you today in opposition to LD-1532, An Act To Protect Maine's Air Quality by Strengthening Requirements for Air Emissions Licensing.

As written, LD-1532 would add a tremendous amount of work to an already complicated process for industrial facilities such as ours. This increased work load wouldn't be restricted solely to the regulated community as it would be a considerable burden on the ME DEP's Air Bureau licensing staff.

The bill calls for shorter term licenses, expanded public noticing on top of existing requirements and a staggering increase in civil penalties of air quality emission standards. We recently reported to ME DEP that we exceeded our NOx emission limit on our No.9 Power Boiler while burning straight natural gas as our hog fuel system was being worked on for repairs that day. The limit is 0.40 lbs of NOx / million BTU's and we finished the day at 0.41 lbs. Under this bill, if enacted as written, this violation would be penalized at a minimum of \$25,000 and perhaps as much as \$100,000.

The penalty amount aside, we would be prohibited from obtaining an air emission license by operating within 1,000 feet of a residential dwelling as is the case here in Baileyville. I'm pretty sure not all of our neighbors are going to move and it's safe to conclude we can't move the mill. However, I don't recall seeing any language that would "grandfather" us.

Additionally, we would be required to conduct continuous monitoring at our property boundary but the bill is silent on what we would need to monitor for. Maine's Chapter 117 on Source Surveillance already sets forth detailed monitoring requirements and we, like many others in the regulated community, have continuous emission monitoring systems (CEMS) on all of our sources here at Woodland Pulp.

The bill also calls for involving the Maine CDC to engage in licensing and renewals to protect public health. It's unclear what the benchmarks are here and what happens if the Maine CDC isn't satisfied with the control technology employed but I sense this would translate into a license being denied issuance.

There likely is a reason why this bill was drafted and is being considered this morning and this document may solve that problem if enacted. Please understand while that situation may get solved, this bill will have a wide spread and adverse impact on the rest of the state of Maine therefore, on behalf of the 320 men and women of Woodland Pulp, we ask the committee to vote out LD-1532 Ought Not to Pass.

Thank you for considering my testimony.

Sincerely,

Scott Beal

Environmental & Security Manager

Woodland Pulp LLC

Baileyville, Maine

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