

May 2021

**RE: LD 1532 – *An Act To Protect Maine's Air Quality by Strengthening Requirements for Air Emissions Licensing***

Senator Brenner, Representative Tucker, and members of the Joint Standing Committee on Environment and Natural Resources, my name is Stacey Keefer, I am speaking today in my capacity as Director for the Maine Marine Trades Association. With respect to boat building and repair it is my understanding most of our members who do have an air emissions license are licensed as minor sources.

The marine industry is fortunate to have had support from Maine DEP to help our businesses better understand the licensing requirements and assistance to help calculate their potential to emit. I have been told that the calculations are not simple, but thankfully the DEP has created an online compliance tool to assist with the process: <https://www.maine.gov/dep/air/permits/compliance-tool.html>

Air emissions licenses issued to minor sources are good for ten years, but the facility must keep up with record keeping and apply for amendments or license upgrades during that time. LD 1532 would change that timing down to three years, plus require a public hearing. The process change sounds cumbersome -- especially for renewals for businesses that have been in operation for multiple decades. It would create extra work for the DEP which also equates to extra cost for the State.

LD 1532 would require major and minor source licensed locations to install a "source emission testing system." It is not clear what is trying to be achieved with this requirement and how often data is recorded and reported. There is also an obligation for applicants to conduct continuous monitoring along the property boundary. It is not clear what is meant by monitoring --measured data? Or observations? There could be licensed facilities in parts of Maine that are a half mile or more from the sources and/or any neighbor where this would not make any practical sense.

Our biggest concern is the proposed constraint that the source of emissions would not be allowed in an area zoned for residential use or within 1,000 feet of a residence. Most boatyards and boat builders are located on or near harbors where there are many, many residences mixed into the commercial waterfront operations. This could eliminate the ability for current marine industry license holders to apply for renewals, let alone submit new applications if needed.

We are curious if there are sufficient examples that indicate that all the extra work and shorter timing on application renewals would equate to better air quality. For our industry, the proposal contains enough requirements of concern that we are asking the Committee to consider major changes to LD 1532 or vote ought not to pass as currently written.

Respectfully,  
Stacey Keefer  
Maine Marine Trades Association, Executive Director