STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION





January 13, 2016

Mr. David Conroy Air Programs Branch Chief USEPA Region 1 - New England 5 Post Office Square, Suite 100 Boston, MA 02109-3912

On August 21, 2015, the USEPA promulgated and published the "Data Requirements Rule for the 2010 1-hour Sulfur Dioxide (SO2) Primary National Ambient Air Quality Standard" which requires states to characterize and submit the current air quality in areas with large sources of SO₂.

The Data Requirements Rule, which establishes a minimum criteria for identifying emissions sources that may be selected for further examination, states that "...each air agency is required to submit a list to the EPA by January 15, 2016, that identifies all sources within its jurisdiction that have SO₂ emissions that exceeded 2000 tons per year (tpy) annual threshold during the most recent year from which emissions data for that source are available".

Based upon the most recent year of quality-assured annual emissions data submitted to USEPA (2014), Maine does not have any individual sources with SO₂ emissions that exceed 2000 tons per year. The most recent year in which any source exceeded the 2000 ton per year threshold was in 2007, when Katahdin Paper in Millinocket, Maine reported emitting 2141 tons per year of SO₂. Since that time, this facility no longer exists and there have been major state-wide reductions in SO₂ due to several factors: statutory requirements to migrate towards lower-sulfur fuels, the expansion of Maine's natural gas infrastructure, conversion of equipment from oil to biomass and natural gas, and marked improvements in facility efficiencies. Given that many of these changes are permanent, Maine does not anticipate that any of its regulated sources will emit in excess of 2000 tons per year in the foreseeable future.

Therefore, it is Maine's position that no modeling or monitoring be required for any sources in our jurisdiction.

Sincerely,

Avery T. Day, Acting Commissioner

cc: Marc Cone, P.E.; Director, Bureau of Air Quality

Eric Kennedy, P.E.; Director, Division of Licensing and Compliance