



State of Ohio Environmental Protection Agency

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*International Joint Commission

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The Honorable Dennis L. Schornack,
c/o Secretary, United States Section
International Joint Commission
1250 23rd Street, N.W., Suite 100
Washington DC 20440

Re: Comments on 2004 Progress Report

Dear Mr. Schornack:

Thank you for the opportunity to comment on the United States-Canada Air Quality Agreement, Progress Report 2004. As the report indicates, significant progress has been made on many fronts. It always seems, though, no matter how far we have come, we still have so much more to do. Below are my comments and observations with respect to the report.

Acid rain SO2 and NOx reductions and monitoring and trends: Even though phase two of Title IV has been implemented, we continue to see additional emission reductions as entities exhaust their early reduction credits. We received applications for scrubbers on four major facilities in 2004. The improvements we are seeing in precipitation acidity are also evident in reduced fine particulate concentrations we are observing within the State of Ohio. This program has had significant benefits in the Ohio River Valley separate from the originally intended acid rain reductions.

Visibility and PSD: We are pleased that there has been increased involvement from Canadian agencies which mirror the U.S. EPA approach in the review of new major sources and the evaluation of impacts on PSD Class I areas or other similar vistas where visibility is an important component of the experience. This effort addressing both new and existing sources will assist both our areas in attaining the long term goals of visibility improvement.

Consultation and Notification of Transboundary PSD sources: This program facilitates the notification of each partner when an application for a significant new source which may impact the Great Lakes region is received. While the issue was ultimately resolved, the process to assure that notifications are made was tested this year with the notification associated with the permitting of the U.S. (FDS) Coking facility in Lucas County. I believe the issues relating to how and by whom the notification was to have been made have been resolved and future notifications will be made in a more timely manner.

Bob Taft, Governor
Jennette Bradley, Lieutenant Governor
Christopher Jones, Director

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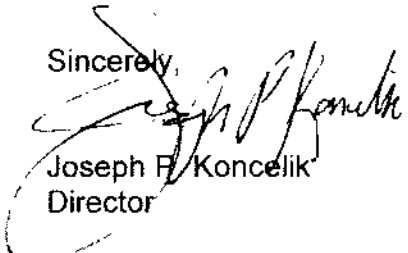
Ozone Annex: The United States has implemented Phase I of the NOx SIP call which resulted in significant reductions of NOx in the Great Lakes region. There is significant efforts to evaluate additional ways to reduce emissions of both VOCs and NOx to attain the revised ozone standards throughout the region. The increased efforts by the Canadian Government to assess and report Canadian emissions is appreciated. The lack of an accurate Canadian inventory has been a hindrance to the development of a complete inventory for the evaluation of regional ozone and fine particulate.

Progress on ozone and PM: While Canada has not adopted revised ozone and PM2.5 ambient standards consistent with the United States, the expansion of the emission reporting requirements in Canada which will address the precursors to fine particulate should be beneficial in our efforts to develop plans to attain the revised air quality standards.

Ohio will continue to participate as much as practicable in the ongoing efforts to enhance environmental quality in the Great Lakes region. The ongoing efforts and research to enhance our understanding of the various problems facing the region are appropriate and hopefully beneficial.

If you have any questions, please feel free to contact Bill Spires of the Division of Air Pollution Control at 614-644-3618.

Sincerely,



Joseph F. Koncelik
Director