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Sent: Monday, February 28, 2005 4:41 PM

To: Washington Commission

Cc: Commission; Eagan, Lloyd L.; Garber, Caroline

Subject: Comments on 2004 Progress Report

Thank you for the opportunity to comment on the United States-Canada Air Quality Agreement Progress Report 2004 document. Our comments are included below. Should you have any questions or need clarification about these comments, please feel free to contact me at 608-2672466 or by e-mail at orlando.cabrera-rivera@dnr.state.wi.us.

Sincerely,

Orlando Cabrera-Rivera
Bureau of Air Management
Wisconsin Department of Natural Resources

1) Page 12, Measures to Reduce VOCs.

This section states that significant reductions in VOC emissions will be achieved through reductions of tetrachloroethylene (PERC) emissions resulting from new regulations on dry cleaning establishments. In 1996, the USEPA excluded PERC from the definition of VOC on the basis that it has negligible photochemical reactivity.

In light of this fact, the expected reductions in PERC emissions should not be listed as part of the effort to reduce VOC emissions under the Ozone Annex to the Air Quality Agreement.

2) Page 18, Reporting PEMA Emissions.

The 2002 National Emissions Inventory (NEI) is listed as one of the main sources of US emissions data for the report. It should be clarified that the data comes from the Draft version of the 2002 National Emissions Inventory, and not from the final version of the NEI. The final NEI is undergoing review, and will not be available until late 2005.