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Great Lakes Commission des Grands Lacs

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February 28, 2005

Lisa Bourget
Secretary
International Joint Commission
U.S. Section
1250 23rd Street N.W., Suite 100
Washington, DC 20037

Dear Ms. Bourget:

Thank you for the opportunity to provide comments on the 2004 Progress Report of the US-Canada bilateral Air Quality Committee, prepared under the Canada-United States Air Quality Agreement. The Great Lakes Commission is fully supportive of this effort to improve emission monitoring, share scientific information and address other commitments under the Agreement.

The Great Lakes Commission staff has reviewed the progress report and offer a couple comments for your consideration.

The Great Lakes Commission works with the Great Lakes states and Ontario to compile a multi-jurisdictional air toxics emissions inventory, targeting 213 pollutants and including all of the 188 hazardous air pollutants identified in the U.S. Clean Air Act. This inventory includes emissions from point, area, on-road mobile and off-road mobile emission sources. The data gathered from each jurisdiction is subject to consistent compilation and calculation methods and may be a valuable source of volatile organic compound (VOC) emissions data for future reporting activities. Among important VOC ozone precursors included in the inventory are hexane, styrene, benzene, toluene, xylene, ethylbenzene, formaldehyde, acetaldehyde, propionaldehyde and acrolein. This inventory has a higher spatial and temporal resolution than other inventories, such as the U.S. Toxic Release Inventory (TRI) and National Emissions Inventory (NEI). We would be pleased to work with the Air Quality Committee and any appropriate partners to facilitate use of this information in future reports or assessments.

The report does not address any progress with persistent bioaccumulative toxics (PBT) substances, such as mercury and other metals; dioxins and furans; chlorinated and brominated organic compounds; and polycyclic aromatic hydrocarbons. Many of these substances, although of greatest concern in aquatic ecosystems and through fish consumption, are emitted primarily to the atmosphere and can be transported across North America. These substances are clearly within the definitions of "air pollution" and "transboundary air pollution" contained in Article I of the Agreement; and are, therefore, subject to the general objective of the Agreement, "to control transboundary air pollution between the two countries."

Ensuring environmental and economic prosperity for the Great Lakes-St. Lawrence region through communications, policy research and development, and advocacy.

*International Joint Commission

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Past reports have included discussions on persistent toxic substances as part of continental/regional issues, and the Board has recommended that implementation of the Great Lakes Binational Toxics Strategy be reviewed. While the current Agreement does not include these substances, they could be considered subject to the Assessment, Notification and Mitigation; Scientific and Technical Activities and Economic Research; and Exchange of Information programs specified under Articles V-VII. In particular, the language in Annex 2 is sufficient to include assessment of emissions, monitoring and modeling of persistent toxics with regard to their adverse effects on aquatic ecosystems and human health.

Although there are many binational programs that target these substances, a need remains for emissions inventories, monitoring programs and modeling efforts in this area. Future reports should include specific mention of programs undertaken and progress being made regarding atmospheric transport and deposition of persistent toxic substances. In addition, the parties should consider including specific objectives and actions regarding these substances when the Agreement is revised.

Thank you again for the opportunity to comment on the 2004 Report. Please contact Kevin Yam at 734-971-9135 or kyam@glc.org if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Mike Donahue". The signature is written in a cursive, flowing style.

Michael J. Donahue, Ph. D.
President / CEO