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Below are our comments on the section of particular interest (Section 2.1.2). NOTE: The page numbers are based on the red-lined document (attached).

Last year, we committed to have a subcommittee help resolve technical questions about the study and work to properly interpret the results of the SOF study. That has not occurred. Per our teleconference from this afternoon, Eastman will send a list of technical questions/concerns regarding the SOF study to you by COB Tuesday, May 17.

The purpose of *this* note is simply to point out a couple of revisions that we believe should be made to the DRAFT Ozone Advance Action Plan prior to the issuance to the broader NETAC committees. Eastman appreciates the opportunity to complete an advance review of the document. Please find our requests below.

Page 34, line 2 of the final paragraph – Maud Cobb should be spelled "Maude Cobb."

Page 43, 2nd paragraph – I suggest the following rewording of the second paragraph:

The purpose of the 2012 and 2015 NETAC SOF studies was to improve the characterization of emissions from the SID to further our understanding of ozone formation and to increase the accuracy of the HRVOC emissions inventories used for ozone modeling. The lack of agreement between the 2015 SOF study emission rates and the emissions inventory could indicate ~~indicates~~ that our understanding of SID facility emission rates and their characterization in NETAC's modeling is not complete. As part of 2016 ozone model improvements, NETAC will complete a comparative study of the ozone actuals (measured at CAMS-19) and the ozone model predicted values based on both the SOF study results and on the data obtained from emissions inventory protocols. This will assist NETAC in prioritizing any future emissions characterization work at the SID. ~~Further work is needed to understand and reconcile the differences between the SOF measurements and the emissions inventory.~~

We believe that no further work should be completed to reconcile the differences between the SOF measurements and the emissions inventory until the following actions have been completed:

- Satisfactorily resolving technical issues (list to be provided by next Tuesday) regarding the SOF study
- Demonstrating by the comparative study (to be completed this summer) that a SOF-EI reconciliation exercise would be value-adding

As discussed in our teleconference, we believe that the overall focus of NETAC should be on NOx emitters and model refinement instead of reconciling ethylene and propylene emissions estimated from the EI and SOF methodologies.

Thank you.

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