

2021 Air Monitoring Revised Network Plan Response to Comments

Comment #	Commenter	Date of Comment	Comment	Response
1	EPA Region 5 (Marta Fuoco)	June 10, 2020	<p>Region 5 has reviewed WDNR's 2021 ANP and we have the following comment on the ozone network:</p> <p>WDNR's proposed 2021 ANP excludes the Sheboygan Kohler-Andrae ozone monitoring site, an existing SLAMS site that is designated as a maximum concentration and transport site. Consistent with our June 21, 2018 letter to WDNR, the exclusion of the Sheboygan Kohler-Andrae ozone site renders WDNR's ANP incomplete and not approvable because it fails to meet the requirements of 40 CFR, Part 50.10(a)(1) and 40 CFR Part 58, Appendix D, 4.1(b). The former requires that the ANP document the established and maintained air quality monitoring network and the latter requires that the ANP provide for a network of ozone monitors that includes monitoring sites located to record maximum concentrations considering factors such as "population, geographic size, population density, complexity of terrain and meteorology, adjacent ozone monitoring programs, air pollution transport from neighboring areas, and measured air quality in comparison to all forms of the ozone standard. Networks must be designed to account for all of these area characteristics." Finally, the Sheboygan Kohler-Andrae ozone monitoring site is the design value site for the Sheboygan County nonattainment area. It violates the 2015 ozone NAAQS with a design value of 0.075</p>	<p>Effective March 30, 2018, Act 159 created a new section, 285(3), in the air monitoring section of chapter 285, Wisconsin Administrative Code. Under the authority of the new statutory section, the department may not include the air monitoring site located in Kohler-Andrae State Park in Sheboygan County in the state's monitoring network plan. If EPA does not approve the initial network plan submitted by the department, the department may submit a revised plan that includes the air monitoring site at Kohler-Andrae. To comply with state law, the Sheboygan Kohler Andrae monitor was omitted from the 2021 annual network plan. As outlined in 285.72 (3)(b)(c) If the federal environmental protection agency does not approve the initial plan submitted by the department under par. (a), the department may submit a revised plan that includes the air monitoring site located at Kohler-Andrae State Park in Sheboygan County. WI Statute 285.72 (3)(b)(c) allows for DNR to revise the draft plan to include the Sheboygan Kohler-Andrae monitoring site.</p> <p>Based on this comment the final annual monitoring plan will include the Sheboygan Kohler Andrae monitoring site. Furthermore, a proposed process change has been added to the 2021 annual network plan regarding the exclusion process. After consultation with the DNR Bureau of Legal Services, the department has reason to believe it has met obligations under Act 159. In future annual network plan submittals, the department plans to include all State and Local Air Monitoring Stations (SLAMS), including the Sheboygan Kohler-Andrae monitoring site.</p>

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2	<p>Sheboygan Ozone Reduction Alliznace (Rebecca D.)</p>	<p>June 12, 2020</p>	<p>Here is SORA's comment on the Air Monitoring Network Plan. Please let me know if you have any questions. Thank you!</p> <p>June 12, 2020</p> <p>RE: 2021 Air Monitoring Network Plan</p> <p>Sheboygan Ozone Reduction Alliance (SORA) is a citizen group focused on reducing air pollution and advocating for the health of Sheboygan County residents. Thank you for the opportunity to comment on this proposed plan, and thank you for your consideration.</p> <p>Air monitoring is an important public health tool and therefore it is important where monitors are sited. SORA does not support the exclusion of the Kohler-Andrae monitor from the 2021 Air Monitoring Network Plan. The Kohler-Andrae monitor provides</p>	<p>Effective March 30, 2018, Act 159 created a new section, 285(3), in the air monitoring section of chapter 285, Wisconsin Administrative Code. Under the authority of the new statutory section, the department may not include the air monitoring site located in Kohler-Andrae State Park in Sheboygan County in the state's monitoring network plan. If EPA does not approve the initial network plan submitted by the department, the department may submit a revised plan that includes the air monitoring site at Kohler-Andrae. To comply with state law, the Sheboygan Kohler Andrae monitor was omitted from the 2021 annual network plan. As outlined in 285.72 (3)(b)(c) If the federal environmental protection agency does not approve the initial plan submitted by the department under par. (a), the department may submit a revised plan that included the air monitoring site located at Kohler-Andrae State Park in Sheboygan County. WI Statute 285.72 (3)(b)(c) allows for DNR to revise the draft plan to include the Sheboygan Kohler-Andrae monitoring site.</p> <p>The final annual monitoring plan will include the Sheboygan Kohler Andrae monitoring site. Furthermore, a proposed process change has been added to the 2021 annual network</p>

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			<p>sensors, to provide valuable air quality data to communities without regulatory monitors. Unless monitoring exists in these areas, it is not likely that air quality issues will be identified and addressed.</p> <p>Air pollution is a serious public health issue. Identifying and effectively managing air quality is an important role that WDNR must take to protect all Wisconsinites. Please feel free to contact us at sorasheboygan@gmail.com if you have any questions or would like additional information.</p> <p>Thank you for your time and your consideration.</p> <p>Sincerely,</p> <p>Sheboygan Ozone Reduction Alliance 920-359-6609 sorasheboygan@gmail.com</p>	<ul style="list-style-type: none"> • Analyze data from the 2017 Lake Michigan Ozone Study (LMOS 2017) and consider the results of the study in future regulatory submittals and modeling. • Install upper air meteorology instrumentation • Work with external research partners to collect and analyze data through non-regulatory methods to inform future decisions and monitoring network design. <p>As a part of the EMP, in June 2020, the Mobile Air Monitoring Laboratory was deployed to Sheboygan where it will remain through September to monitor ozone precursors to allow DNR and partners to better understand specific chemistry associated with ozone formation and transport along the Wisconsin Lake Michigan shoreline.</p> <p>Due to the experimental nature of some of the methodology being utilized in the EMP, data may not be available through mechanisms utilized for regulatory data at this time. DNR continues to consider how best to make data from the MAML and other EMP related efforts available to researchers and the public.</p> <p>DNR has begun efforts to study and understand the usability of data produced by PurpleAir and other low cost sensors. It has concluded that the data can provide some qualitative value, but that the accuracy of the raw data provided by these sensors and presentation of the data can be inappropriate to use for quantitative or regulatory purposes without substantial effort to correct and present the data.</p> <p>DNR is following and contributing to national efforts to address some of these challenges to allow low cost sensor data to be used more beneficially by regulatory agencies and the general public.</p>