

2023 Air Monitoring Revised Network Plan Response to Comments

Comment #	Commenter	Date of Comment	Comment	Response
1	Sheboygan Ozone Reduction Alliznace	June 10, 2022	<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 10, 2022</p> <p>RE: 2023 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>SORA believes that more air monitoring sites are needed to understand the extent of air pollution and provide more accurate air quality data. SORA encourages WDNR to expand its monitoring network to “fill in” the spatial gaps in air quality data where monitoring does not occur and is not required by the EPA. WDNR should consider additional ozone monitoring sites in areas that repeatedly have difficulty attaining NAAQS, and continue to expand its Mobile Air Monitoring Laboratory (MAML) program. SORA requests that data collected from the MAML be publicly available on WDNR’s website.</p>	<p>The statewide monitoring network is spatially distributed to provide air quality information based on geographic coverage and population density. As required by the Clean Air Act, the U.S. EPA sets National Ambient Air Quality Standards (NAAQS) for criteria pollutants, which include particulate matter, NO₂, ozone, CO, SO₂ and lead. The DNR conducts ambient air monitoring in locations directed by federal requirements to measure concentrations of criteria pollutants for comparison to the appropriate NAAQS. Sheboygan County is federally required to have one ozone monitoring site. The state maintains two permanent sites in Sheboygan county specifically designed to better understand the lakeshore ozone gradient.</p> <p>Additionally, as required by 40 CFR Part 58 Appendix D 5(h), DNR has implemented an enhanced ozone monitoring plan (EMP). EMPs are required in areas with a moderate NAA classification and above. DNR worked closely with EPA Region 5 to design a multi-year, phased EMP that includes monitoring activities and study activities that will provide more information and insight into the state’s complex lakeshore ozone issues. EPA approved an enhanced ozone monitoring plan as part of its approval of Wisconsin’s 2023 ANP. As part of its continued commitment to enhanced ozone monitoring, DNR plans to:</p> <ul style="list-style-type: none"> • Continue monitoring ozone concentrations at additional sites beyond those required. • Continue monitoring ozone precursors (NO_x) at additional monitors beyond those required. • 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.

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			<p>There are also significant gaps in the PM10 and PM2.5 monitoring networks that make it difficult to determine particulate matter levels in areas without monitoring. WDNR should consider establishing a network of low cost PM sensors, such as Purple Air 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>	<p>As a part of the EMP, in June 2022, 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. EMP data is available to the public through a Widen portal available on the DNR website. https://widnr.widencollective.com/portals/iwvftorq/AirMonitoringData</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>