

2025 Air Monitoring Revised Network Plan Response to Comments

Comment #	Commenter	Date of Comment	Comment	Response
1	Jenny Hoople, Bountiful Beloit Farm Market	5/29/24	<p>Emailed comment:</p> <p>Hello, thank you for taking public comments on this!</p> <p>Please expand our air quality monitoring to include more rural communities, especially places with a high concentration of industrial activity like factories and natural gas plants. The rural community deserves to know what they're breathing, too!</p>	<p><b>Response to comments to generally expand Wisconsin's monitoring network.</b></p> <p>The statewide monitoring network is spatially distributed to provide air quality information based on federal requirements, geographic coverage and population density.</p> <p>As required by the Clean Air Act, the U.S. Environmental Protection Agency (EPA) sets National Ambient Air Quality Standards (NAAQS) for criteria pollutants, which include particulate matter (PM), nitrogen dioxide (NO<sub>2</sub>), ozone, carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>) and lead.</p>
2	Nathan Dombeck	5/29/24	<p>Emailed comment:</p> <p>I am writing a public comment in favor of expanded Wisconsin Air Monitoring.</p> <p>Clean air is an environmental, social justice, and health issue and needs to be treated as such. Wisconsin is a state known for its natural resources and natural beauty, and unfortunately the unmitigated burning of fossil fuels, as well as pollution from transportation, industrial production facilities, and other sources, threaten our air quality.</p> <p>I am calling for expanded monitoring both in communities known to have higher pollution rates (ie those around power plants or industry) as well as in smaller/rural locations so the whole spectrum of our state and where impacts lie.</p>	<p>The Wisconsin Department of Natural Resources (DNR) and its tribal partners operate over 40 fixed ambient air monitoring sites throughout Wisconsin. One or more criteria pollutants are measured at most of these sites. Monitoring sites often serve a purpose beyond the criteria pollutants network; such is the case with the National Atmospheric Deposition Program (two sites), Biowatch (14 sites) and Air Toxics (one site).</p> <p>The DNR conducts ambient air monitoring in locations directed by federal requirements to measure concentrations of pollutants determined by the goals of different networks.</p> <p>The <a href="#">Wisconsin Department of Natural Resources Annual Monitoring Network Plan</a> is an annual process that details that the siting and operation of each monitor meets the requirements of 40 CFR Part 58 and certifies that the state has met all federal ambient air monitoring requirements.</p> <p>The DNR does not have funding to support monitoring beyond what is federally required.</p> <p><b>Response to Comments #1-4</b></p>

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3	Karen Samelson	6/11/2024	<p>Emailed comment:</p> <p>We need more air monitoring stations so that we can identify problem areas and make sure that people are aware of poor air quality. My boyfriend in Milwaukee has asthma and it's important for him to know when he should stay indoors. Others should also be able to get this information.</p>	
4	Sommer Brockman	6/12/2024	<p>Emailed comment:</p> <p>Dear Air Management Specialist Howard,</p> <p>Please expand monitoring to include communities that are known to have higher density and number of local polluters, especially communities with large fossil fuel pollution sources from: transportation, industry, and fossil-gas burning power production.</p>	
5	Brittany Keyes as Convener of the Stateline Clean Air Coalition	5/29/24	<p>Emailed comment:</p> <p>Good Afternoon Members of the WI DNR, My name is Dr. Brittany Keyes, and I am the convener of the Stateline Clean Air Coalition speaking on behalf of the concerns and the need of our region for increased attention, investment, and monitoring in order to safeguard the health of all who work, live, and visit communities in Southern Wisconsin and the greater Stateline Community. Specifically we ask that your</p>	

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			<p>plan under consideration be amended to include expedient placement of an EPA particulate matter monitor in Beloit, WI, locating it in a location that captures the local pollution contributing to our poor public health metrics.</p> <p>The Stateline Clean Air Coalition is a group of nonprofits and concerned individuals from a variety of backgrounds committed towards actions that will improve the quality of the air across the stateline and thus, improve the health of the greater stateline community. Members include: long-time community service organizations, outdoor education organizations, and notable advocacy organizations with statewide and national representation.</p> <p>The Stateline Clean Air Coalition was formed after relative inaction following the public sharing of a community science project that found the local PM2.5 pollution across Beloit to be well over the updated EPA safety standard and 2-3x of the WHO safety standard.</p> <p>As the lead community scientist of said research project and former Beloit City Councilor, I am happy to speak to anyone from the WI DNR in greater depth as to what precipitated this project, the details of said project, and public efforts since that time. Notable highlights include: the purple air monitors and EPA loan program utilized came from WI DNR recommendation, the WI gold standard</p>	<p>particle pollution. This is primarily due to federal and state regulations that have led to decreases in emissions of PM2.5 and other contributing pollutants.</p> <p>The Clean Air Act requires the EPA to periodically set and review NAAQS. The NAAQS are designed to protect public health based on the latest available science and can have significant health benefits across the United States. On February 7, 2024, the EPA finalized a more stringent NAAQS for PM<sub>2.5</sub>. A revised NAAQS starts a designations process in which the EPA determines the areas of the country that are in ‘attainment’ of the NAAQS and those that are in ‘nonattainment’. The EPA must make final designations for the new PM<sub>2.5</sub> NAAQS by February 2026 based on 2022-2024 monitoring data. While reviewing the level of the NAAQS, the EPA also completed a review of the monitoring requirements for PM<sub>2.5</sub> and finalized updated requirements on February 7, 2024.</p> <p>The DNR’s air monitoring network meets all applicable monitoring requirements set by the EPA’s Code of Federal Regulations (CFR Part 58). The DNR does not have funding to support monitoring beyond what is federally required.</p> <p>Instruments that collect regulatory ambient air data across Wisconsin are all Federal Reference Method or Federal Equivalent Method (FRM/FEM). These instruments go through a rigorous process before being designated FRM or FEM, resulting in methods that accurately and reliably measure pollutants in outdoor air. These methods can be used for comparison to the NAAQS and to determine implementation actions needed to attain the NAAQS.</p> <p>Hourly PM<sub>2.5</sub> data are used to demonstrate compliance with the PM<sub>2.5</sub> NAAQS, calculate the air quality index (AQI) and allow for the protection of public health through forecasts and Air Quality Advisories. The DNR reports continuous data to Wisconsin’s Air Quality website (<a href="https://airquality.wi.gov/">https://airquality.wi.gov/</a>), EPA’s AIRNow website (<a href="https://gispub.epa.gov/airnow/">https://gispub.epa.gov/airnow/</a>) and eventually to EPA’s final data repository, Air Quality System (AQS).</p>

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			<p>conversion factor were applied to our statistical analysis, and the monitoring period analyzed did *NOT* overlap with the Canadian wildfires.</p> <p>Appreciating that air pollution negatively impacts almost every organ system in the body and harms health across the lifespan, including but not limited to: increased rates of asthma, lung disease, cancer, heart attacks, stroke, diabetes, Alzheimer’s, Parkinsons, ASD/Autism, poor mental health as well as contribute to poor educational outcomes, our community cannot afford delays in regulatory monitoring or action.</p> <p>According to the nationwide climate vulnerability index the city of Beloit has the 2nd, 3rd, and 4th most vulnerable census tracts out of 1,409 census tracts in the State of Wisconsin. The most concerning scores include: mental health and deaths of despair, chronic disease and disability, and housing, infrastructure, and transportation. Air pollution directly contributes to the first two measures, and the impacts of elevated air pollution are compounded due to the third.</p> <p>Again, please update the current plan to expand PM2.5 monitoring to Beloit, WI, locating the monitor in a location of high vulnerability and that captures maximum air pollution that is actively harming our community’s health.</p> <p>I will be submitting written comments as well as research documentation</p>	<p>Air pollution control permits are another tool that the DNR uses to ensure the air quality is protected when new or existing facilities construct or change processes.</p> <p>Before the DNR can issue an air pollution control permit, state and federal laws and regulations require the DNR to assure that the worst-case air pollution emissions from a facility will not cause pollution concentrations in the vicinity to exceed the NAAQS set by the EPA. This is done through extensive air quality analysis that typically includes air dispersion modeling.</p> <p>Compliance assurance and assistance efforts help sources meet air program regulatory requirements. Stationary source assistance includes individual meetings to discuss air permit options, emissions inventory requirements, and compliance demonstration responsibilities for state and federal rules including; process modifications, additions or shut-downs; emissions monitoring, record keeping and reporting requirements. For example, the air pollution Emissions Inventory, and compliance inspections are compliance tools that the DNR and the EPA use to determine air pollution control permit requirements are being met.</p> <p>Some commenters referenced greenhouse gases and the impacts of climate change. The DNR Air Management Program works closely with the EPA and the Wisconsin Department of Administration’s Office of Sustainability and Clean Energy (OSCE) to implement federal rules, track greenhouse gas emissions, and ensure the state meets its climate goals. In 2021, the program developed a statewide greenhouse gas emissions inventory for 1990 through 2018. The program is currently working on an update to that inventory that will include 1990 through 2021 greenhouse gas emissions. This inventory will support climate planning work led by OSCE, including the identification and evaluation of emission control measures from all types of sources across the state. The Air Management Program also evaluates all EPA rules that regulate greenhouse gases,</p>

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6	Elizabeth Brewer as member of Stateline Clean Air Coalition	5/29/24 6/11/24	<p>Written comment in public meeting chat:</p> <p>As a member of the Stateline Coalition, I very much support the request for a PM2.5 monitor, particularly as the city government does not hold valid the data from Purple Air Monitors.</p> <p>Emailed comment:</p> <p>Dear Air Management Specialist Howard,</p> <p>I live in Beloit. According to EPA data going back 10 or more years, Beloit's air quality is very bad and getting worse, while elsewhere in Wisconsin, air quality is improving, such as in Madison. The presence of a power plant on Beloit's northern border helps account for it. It has the capacity to provide energy to 550,000 households and all but 18,000+ of those households are located outside of Beloit.</p> <p>Alliant, the power plant, claims that Beloit need not worry about poor air quality, and discounts data gathered by citizen scientists in Beloit using Purple Air Monitors loaned to the scientists by the EPA. It also disputes the validity of the 2023 IQairquality report.</p> <p>Placement of a PM2.5 monitor in Beloit could provide valuable information to Beloit and other communities in Rock County and help them fight for action to improve the air their residents breathe.</p>	<p>including rules that regulate greenhouse gas emissions at power plants.</p> <p>A number of comments reference the IQAir 2023 World Air Quality Report. IQAir is a Swiss company specializing in air quality technology including air purifiers, air filters, air quality sensors and data platforms. The <a href="#">2023 World Air Quality Report.pdf (iqair.com)</a> authored and issued by IQAir provides an analysis of global air quality based on a combination of quality controlled regulatory data and uncontrolled nonregulatory sensor data. The limitations of comparing uncontrolled sensor data to regulatory data are well understood. Additionally, IQAir used an unpublished proprietary algorithm for data validation and interpretation of sensor data, preventing the results of the report from being replicated. The report also uses a methodology for defining specific areas called, “settlements” determined by local population distributions and administrative divisions that is inconsistent with EPA’s methodology which defines areas based on metropolitan statistical areas (MSAs) or core based statistical areas (CBSAs). IQAir’s administrative approach can lead to inconsistencies in how cities are assessed relative to air quality.</p> <p>The 2023 IQAir report also relies on 2023 data, which includes data from when the region was heavily impacted by the 2023 Canadian wildfire smoke events.</p> <p><b>Response to Comments #5-32</b></p>

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7	Cristina Carvajal Executive Director of Wisconsin EcoLatinos	5/29/24	<p>Verbal Comment from Public Meeting:</p> <p>“I’m Cristina Carvajal. I’m Executive Director of Wisconsin EcoLatinos. Part of our mission is to address environment justice and air quality is an environmental justice issue. Bad Air Quality effects and is impacting people of color at a greater proportion than others and we believe increasing the number of monitors that measure PM2.5 will address some of these issues. We support the Stateline Clean Air Coalition’s request to install a monitor close to the Beloit area. Which is an area with a population of over 21% Latina population in relation to black population. It’s an area with a very high social burden indexes and is considered an environmental justice area too. So again, I reiterate my support for the Stateline Clean Air Coalition, and we would like the DNR to consider installing a monitor in this area. Thank you so much for listening.”</p>	
8	Susan Adams League of Women Voters Beloit	5/29/24	<p>Emailed comment:</p> <p>I am the Action Chair and Secretary. I echo Brittany Keyes’ comments. Our city – Beloit – has received much negative press about being the worst regional city in terms of air quality. Much of this is due to a lack of monitoring elsewhere. Our city has dismissed the report as being due to Canadian wildfires,</p>	

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			<p>which were not occurring during the testing period. Accordingly, people here do NOT believe we have an issue here. We need a monitor from DNR to meet our needs that the city and residents will believe. My husband and I have our own Purple Air monitor that is my understanding that the DNR had approved as valid. Our own monitor was NOT in the study by the way. I believe it is very important to include Beloit in air quality monitoring conducted by the DNR. Thank you for your time.</p>	
9	Brittany Keyes Personal comment	5/29/24	<p>Verbal Comment from Public Meeting:</p> <p>“This issue is quite personal to me. Our young neighbor who’s in 2<sup>nd</sup> grade was diagnosed with non-exercise asthma. It took a while for her to be diagnosed because the doctors were pushing this off as a 100-day cough that everybody has in our community. This is very concerning. This is the same symptoms my daughter had and still has. It does appear she is developing a similar respiratory condition that likely could be preventable if we do clean up our air. This is a timely issue. This is a health issue impacting our youth. I really ask to prioritize all health metrics in making this decision. I second what Christine said about our high climate justice and high vulnerability. I also ask that you consider moving the current ozone monitor. It has been reflected upon as more of a regional monitoring impact versus local. In the current location on the</p>	

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			west side of Beloit it really doesn't capture the three main sources of local pollution and I ask you consider relocating that to a place that captures local air pollution and what is truly impacting the health of the community and our children. Thank you so much."	
10	DeVon McIntyre	5/29/24	<p>Emailed comment:</p> <p>Hello, my name is DeVon McIntyre I am for increased air monitoring in Wisconsin. Recently my city, Beloit, was in headlines for very poor air quality. I've had respiratory issues throughout my life and wonder how that's impacted me as well as my neighbors. Going forward I believe the DNR should closely consider community health metrics with the additional placements of air monitors regarding local air pollution. Thank you.</p>	
11	Ellen E Joyce	6/3/24	<p>Emailed comment:</p> <p>Please expand the monitoring program to Beloit. This is a vulnerable, underserved population with high rates of childhood asthma, a nearby polluting power plant, and heavy truck traffic on two major routes through town. We need to know what's in the air we're breathing so we can take steps to protect our vulnerable children and elderly. Beloit should be a very high priority for air quality monitoring.</p>	



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12	Yocelyn Camacho	6/4/24	<p>Emailed comment:</p> <p>Please put one in Beloit Wisconsin!</p>	
13	Christine Nelson	6/10/24	<p>Emailed comment:</p> <p>I am writing to request that a PM2.5 monitor be installed in Beloit, in a location that captures conditions in a populated area affected by sources of air pollution. Community volunteers have initiated monitoring of PM2.5 pollution and would like to continue doing so. We have found that PM2.5 levels are above established standards.</p> <p>While we want to explore solutions with local officials and utilities, we are facing a lack of acceptance of the existing data by them. This has made it difficult to work toward solutions in our community. We know there is a problem. Data from a DNR monitor will help us make a convincing case so we can make progress toward improving our air.</p>	
14	Judy Robson	6/10/24	<p>Emailed comment:</p> <p>Hello, given recent information from citizen monitors regarding very high particulate matter levels in Beloit WI, it seems not only logical but prudent to install a PM2 monitor in Beloit WI. The state needs to capture this information include this information on particulate matter in their data base so a plan can be implemented to find the source(sources) and remediate the problems. We need to</p>	

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			<p>protect the health and well being of our citizens especially the most vulnerable; babies, children and those with chronic health conditions, I hope you will prioritize Beloit in your decision.</p>	
15	Jenny Van Sickle	6/10/24	<p>Emailed comment:</p> <p>I recently read a quote from the DNR that said, Beloit's citizen monitoring program's data would be valuable...if data is valuable than we need to deploy more monitors.</p> <p>Where monitors are lacking, the state is sometimes relying on the DNR's booklet and/or plucking data from monitors that permit applicants suggest regardless of proximity, maintenance, verification of accuracy or absence of tampering.</p> <p>Human health needs to be prioritized by state agencies in their programs, priorities and expenses. Deploying more monitors is just one way to actually take stock of how neighboring pollution, local projects, and decisions are impacting communities to which the state is responsible.</p>	
16	Dennis Murphy	6/10/24	<p>Emailed comment:</p> <p>Beloit was rated by some national air quality measurement as having the Worst air in the country. A DNR monitoring system is absolutely necessary so sources of pollution can be corrected. A DNR monitoring system is the first step.</p>	

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17	Patricia Zody	6/10/24	<p>Emailed comment:</p> <p>I am writing to request the placement of a PM2.5 (Particulate Matter) monitor in Beloit, WI, and/or all other under-monitored WI communities of concern.</p> <p>Given the recent community science efforts in Beloit that found concerns for human health, our public health metrics that mirror what we would expect, and the recent comparative study by IQAir, the community/Stateline region deserves more focused monitoring.</p> <p>Thank you for taking the time to consider thoughtfully the placement of PM2.5 monitor in Beloit. Our constituents deserve it to keep them safe and healthy.</p>	
18	Abby Novinska-Lois	6/12/2024	<p>Emailed comment:</p> <p>As a public health professional who has studied air pollution and witnessed its impacts in communities across our state, I am writing to ask that the DNR consider the following in their monitoring network plan:</p> <p>We know that transportation, industry, and power plants release dangerous air pollution. These sources are reported to the EPA and DNR. Please expand monitoring to include communities that are known to have higher density and number of local polluters. Population size should not be the major factor for</p>	

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			<p>decision-making for monitor placement, general health risks and environmental justice measures should come first. Data from the Department of Health Services and the EPA EJ Screen can help direct prioritization. Priority should be given to counties that have the highest crude asthma hospitalization rates and EJ concerns.</p> <p>Community science efforts utilizing Purple Air or IQ Air can also point to areas of concern. For example, Beloit citizens monitored their air utilizing Purple Air and found concerning trends in PM 2.5. The DNR can look to readings from citizen monitors, like those in Beloit, to identify additional locations of concern. If poor air quality is occurring in those areas on a regular basis, a regulatory monitor should be placed in that location. Please consider placing a monitor in Beloit.</p>	
19	Steven Howland	6/11/24	<p>Emailed comment:</p> <p>I'm concerned about the air quality of Beloit. The IQ 2023 report listed Beloit as having the worst air quality of any regional city in the U.S. Even factoring in the "limitations" or the "context" of the IQ report (focusing only on the PM 2.5 readings vs. the broader AQI, use of the WHO standard for PM 2.5, 5 micrograms/M3 vs. the EPA standard of 9 micrograms/M3, the wildfire impact from Canada for the month of June when the PM 2.5 reading was over eight times the</p>	

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			<p>WHO safe standard, and the fact that there are many areas that don't have any monitor readings for comparison) there should be concern for Beloit. In only two of twelve months did Beloit's readings for PM 2.5 meet the "safe" EPA standard, and in no month did a reading meet the "safe" WHO standard.</p> <p>Beloit can't keep air entering from other places into our city, nor can it prevent air exiting Beloit to other nearby areas. What it can do is limit its own contribution to pollution and plan to keep its residents as safe and healthful as possible when air quality is less than optimal. To do this we need data. Data that is measured in the places where people are most vulnerable. We need to be able to identify sources of PM 2.5, and assistance in developing and implementing a plan to mitigate those sources, both short term and long term. We need to bring together various bodies and organizations to create safe places for our children, youth and most vulnerable residents to enjoy activity, education and entertainment during dangerous air quality events. And we need data and notifications to trigger our response.</p> <p>Issues that I hope the DNR will address in conjunction with the EPA are: 1) The location of any sensors (they should be in areas that are most populated and where residents are the most vulnerable to poor air quality) 2) Working with those who have local community monitors (e.g.</p>	

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			<p>PurpleAir) to test accuracy and improve data collection. 3) Establish a more robust notification system of entities (City officials, organizations, schools, etc.) so we are able to respond more quickly to spikes in unsafe readings.</p> <p>Just having a website that people can check doesn't get the job done. Too often we default to, "If we build it they will come." Beloit doesn't just need a resource, we need a relationship.</p>	
20	Brenda Plakans	6/11/24	<p>Emailed comment:</p> <p>I am writing to encourage the DNR to continue to expand its air monitoring program, so that residents of Wisconsin have a more complete picture of air pollution in their state. Special attention should be paid to communities that are known to have higher density and number of local polluters, especially communities with large fossil fuel pollution sources from: transportation, industry, and fossil-gas burning power production.</p> <p>An IQAir Report found Beloit to be the most polluted regional city in the U.S. in 2023, which suggests Wisconsin state regulators need to expand monitoring in the City of Beloit and throughout Rock County. This superlative also demonstrated that state efforts to measure air quality are woefully inadequate and should be expanded to better capture the regional impacts of air pollution.</p>	

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			<p>We hosted one of the Beloit air monitors at Welty Environmental Center, so know first hand the benefits of measuring air quality in real time. I strong endorse an expanded network of air monitoring throughout the state of Wisconsin, with priority given to counties that have the highest crude asthma hospitalization rates and under-monitored air.</p>	
21	Gregg Schneider	6/10/24	<p>Emailed comment:</p> <p>As I am sure you already know, Beloit has been identified as one of the most polluted communities in the country. The air quality readings were from before the Canadian wildfires. The high ranking is partially due to the lack of air monitors throughout the country.</p> <p>However, Beloit is just south of a huge natural gas power plant that was expanded to avoid meeting the new air quality standards. Rockford IL is considering suing Wisconsin for the pollution from the Aliant Energy plant.</p> <p>The Purple Air monitors in and around Beloit have readings that vary depending on location.</p> <p>With the high health risks from air pollution suffered by residents in and around Beloit and the known polluters here, it is critical that Beloit receives a high-quality air monitor placed in the</p>	

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			correct location. Only then will we truly know our health risks and have data that the city, county, and state can not dispute and can be used to take action to protect our health.	
22	Michelle Asp	6/6/24	<p>Emailed comment:</p> <p>As someone with Asthma, married to someone with heart issues, who is concerned about the quality of air for our children and those of us who enjoy our beautiful outdoor spaces, I strongly urge local officials to implement real-time air quality monitoring in Superior. A refinery is a massive particle polluter, but there are other reasons to be mindful of our air (Canadian wildfires, rail spills, etc).</p> <p>I am writing to request that the Wisconsin Department of Natural Resources consider the following for their 2025 air monitoring network plan:</p> <ul style="list-style-type: none"> <li>-Please expand monitoring to include communities that are known to have higher density and number of local polluters, especially communities with large fossil fuel pollution sources from: transportation, industry, and fossil-gas burning power production.</li> <li>-Stop limiting air monitor placement based upon population and population density. The resistance to placing monitors in smaller cities and rural areas</li> </ul>	



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			<p>only adds to the rural/small city versus large city divide - both regarding health and other social drivers.</p> <p>-Incorporate the EPA environmental justice screen and other climate vulnerability measures into the network expansion consideration. Include data from the Department of Health Services and prioritize public health data in the annual monitoring network review. Priority should be given to counties that have the highest crude asthma hospitalization rates and under-monitored air.</p> <p>-Prioritize placing monitors in locations that capture local air pollution near high polluting sources that would negatively impact public health versus locations focused on measuring and reporting regional trends.</p> <p>-The long term goal should be expanding monitoring to include every county in Wisconsin, but given limited resources and staffing, communities with the greatest climate vulnerability and the highest reported industrial pollution should be prioritized with air monitoring expansion.</p> <p>-After community science efforts and an IQAir Report found Beloit to be the most polluted regional city in the U.S. in 2023, Wisconsin state regulators need to expand monitoring in the City of Beloit</p>	

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23	Kristina Jones	6/6/24	<p>Emailed comment:</p> <p>I am writing to urge that the Wisconsin Department of Natural Resources (DNR) implement a comprehensive 2025 air monitoring network plan: As a public health professional who has asthma, I feel strongly that air quality monitoring is crucial throughout Wisconsin. Air quality is an important determinant of respiratory health for me and may other Wisconsinites with asthma.</p> <p>DNR's plan should include the following:</p> <ul style="list-style-type: none"> <li>-Intentionally include communities that are known to have higher density and number of local polluters, especially communities with large fossil fuel pollution sources from: transportation, industry, and fossil-gas burning power production.</li> <li>-Place monitors in smaller cities and rural areas, as well as in larger urban areas.</li> <li>-Incorporate the EPA environmental justice screen and other climate</li> </ul>	

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24	Joel Charles	6/6/24	<p>Emailed comment:</p> <p>As a rural family doctor taking care of low income patients with heart and lung disease I know how important it is for my</p>	

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25	Ann Behrmann	6/6/24	<p>Emailed comment:</p> <p>As a pediatrician in Madison caring for children with asthma and neurodevelopmental issues, I realize the impact air pollution has on developing</p>	

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			<p>brains and lungs as well as cardiovascular health of both children and adults.</p> <p>I am writing to request that the Wisconsin Department of Natural Resources consider the following for their 2025 air monitoring network plan:</p> <ul style="list-style-type: none"> <li>-Please expand monitoring to include communities that are known to have higher density and number of local polluters, especially communities with large fossil fuel pollution sources from: transportation, industry, and fossil-gas burning power production.</li> <li>-Stop limiting air monitor placement based upon population and population density. The resistance to placing monitors in smaller cities and rural areas only adds to the rural/small city versus large city divide - both regarding health and other social drivers.</li> <li>-Incorporate the EPA environmental justice screen and other climate vulnerability measures into the network expansion consideration.</li> </ul> <p>Include data from the Department of Health Services and prioritize public health data in the annual monitoring network review. Priority should be given to counties that have the highest crude asthma hospitalization rates and under-monitored air.</p>	

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			<p>-Prioritize placing monitors in locations that capture local air pollution near high polluting sources that would negatively impact public health versus locations focused on measuring and reporting regional trends.</p> <p>-The long term goal should be expanding monitoring to include every county in Wisconsin, but given limited resources and staffing, communities with the greatest climate vulnerability and the highest reported industrial pollution should be prioritized with air monitoring expansion.</p> <p>-After community science efforts and an IQAir Report found Beloit to be the most polluted regional city in the U.S. in 2023, Wisconsin state regulators need to expand monitoring in the City of Beloit and throughout Rock County. This includes adding one-to-two PM2.5 monitors in Rock County and ensuring that all monitors are placed in areas that will capture the main sources of local pollution negatively impacting their community's health.</p>	
26		6/11/24	<p>Emailed comment letter:</p> <p>As the elected officials who represent Beloit in the Wisconsin State Legislature, we write to request a modification to the 2025 Air Monitoring Network Plan to include a PM2.5 monitor in Beloit. We have heard about air quality – an issue of</p>	

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	<p data-bbox="342 305 499 427">Mark Spreitzer State Senator 15th Senate District</p> <p data-bbox="342 467 499 654">Clinton Anderson State Representative 45th Assembly District</p>		<p data-bbox="764 240 1230 1414"> utmost importance – from constituents who are concerned that the air we breathe in Beloit is not safe. Recent news articles and local studies have heightened awareness and concern in our community, prompting us to engage in this process on their behalf. We appreciate the Department's work with us to address these concerns, and we are committed to providing the best information possible to our constituents about air quality in the Beloit area. Beloit is home to a diverse community of residents, many of whom are especially vulnerable to the impacts of climate change and poor air quality. It is well-documented by both the U.S. Environmental Protection Agency and the Wisconsin Department of Natural Resources that the burdens of climate change are disproportionately distributed, with socially vulnerable groups facing higher risks. The characteristics of Beloit align with those of a highly vulnerable community. Data from the U.S. Census Bureau's 2022 American Community Survey 5-Year estimates highlight that: <ul style="list-style-type: none"> <li data-bbox="764 1117 1192 1174">☐ 15.4% of Beloit's population lives in poverty, compared to 10.7% statewide.</li> <li data-bbox="764 1187 1192 1243">☐ 18.2% of residents hold a bachelor's degree, versus 33.2% statewide.</li> <li data-bbox="764 1256 1192 1313">☐ 13.1% of the population is Black or African American, compared to 6.6% statewide.</li> <li data-bbox="764 1326 1192 1383">☐ 21.5% of the population is Hispanic or Latino, compared to 7.6% statewide.</li> </ul> </p>	



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			<p>Additionally, the Beloit area contains four of the most vulnerable census tracts in all of Wisconsin, according to the U.S. Climate Vulnerability Index:</p> <ul style="list-style-type: none"> <li>☐ Tract 55105001600 in Beloit is ranked second-most vulnerable in the state.</li> <li>☐ Tract 55105001800 in Beloit is ranked third-most.</li> <li>☐ Tract 55105001700 in Beloit is ranked fourth-most.</li> <li>☐ Tract 55105001400 on Janesville’s south side is ranked sixth-most.</li> </ul> <p>While Beloit currently has an ozone monitor placed on the west side of the city as part of ongoing air monitoring, concerns about PM2.5 levels are rising within the community. Constituents have approached us personally to express their fear that they are not able to safely spend time outdoors for recreation or employment. These concerns have been reinforced by results from a citizen air monitoring project using equipment provided by the EPA that reported elevated levels of PM2.5 in Beloit in late 2022. Although we understand the Department's regional approach to air quality, it is imperative to recognize the high risk in the Beloit area and establish an air monitor in the community. We encourage the Department to work with local stakeholders to locate a PM2.5 monitor in Beloit in consultation with local stakeholders – either in one of the vulnerable census tracts or where it is most likely to pick up localized sources of</p>	

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			<p>PM2.5. This step is vital not only to alleviate active fears in the community, but to also ensure the protection of our most vulnerable residents.</p> <p>Acknowledging the threats to vulnerable populations obligates us to take protective measures. Addressing current concerns is essential and reaffirms our shared commitment to protecting these communities. Collecting, analyzing, and distributing air quality data from Beloit is the first step to demonstrating our commitment to protecting vulnerable populations in Beloit on this issue.</p> <p>We are dedicated to seeing that an air monitor for PM2.5 is located in the Beloit area, and we look forward to collaborating with the Department to achieve this goal.</p> <p>Thank you for your attention to this critical matter, and for the opportunity to submit this letter.</p>	
27	Pablo Toral	6/4/24	<p>Emailed comment:</p> <p>I appreciate your invitation to offer input on your 2025 Air Monitoring Network Plan.</p> <p>As a resident of Beloit, I am concerned about the growing CO2e emissions in our city, as documented by the EPA's Greenhouse Gas Reporting Program. The latest data available are for 2022. Rock County reported 2,453,164 metric tons of CO2e (88.6% of those coming from a single facility.) For comparison, Dane</p>	

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			<p>County (WI) reported 858,404 and Cook County (IL) reported 1,910,900 in 2022. Between 2017 and 2022, Rock County's reported CO2e emissions increased from 735,867 metric tons to 2,453,164 (3.3 times more.) Between 2017 and 2022, reported CO2e emissions in Dane County increased from 743,052 metric tons to 858,404 (+11.55%) and in Cook county they fell from 2,221,848 in 2017 to 1,910,900 in 2022 (-14%.) It must be noted that these reported emissions are not exhaustive, as only large facilities are required to report.</p> <p>While I am aware that CO2 is not considered an air pollutant (its impact on climate change notwithstanding) as it can occur naturally, the significant increase in CO2e emissions in Rock County since 2017 suggests human-made causes, mostly the burning of fossil fuels, which would lead me to hypothesize a significant increase in criteria air pollutants in Rock County in general, and in Beloit in particular (considering the location of the main source of CO2 emissions and the prevailing wind direction, which places Beloit downwind from it.) These criteria pollutants would have a significant impact on the health of individuals in our community, which is an environmental justice community that has fewer resources to address these challenges. Recent reports that made international news also documented some of the</p>	

Comment #	Commenter	Date of Comment	Comment	Response
			<p>highest concentrations of PM2.5 in the US.</p> <p>For these reasons, I urge you to monitor air pollution in Beloit closely and intentionally and to take appropriate measures to help address our pollution problems. Adding some of the DNR sensors for criteria pollutants in Beloit (in a better location than the existing ozone sensor that tracks regional rather than local pollution) would be a great next step.</p> <p>Sincerely, Pablo Toral</p>	
28	Anthony Capozziello	6/3/24	<p>Emailed comment:</p> <p>As a Rock County resident of 13 years and a former Dane County resident of over 20 years prior to this, it's imperative to recognize the huge difference between these two areas.</p> <p>Hand in hand with a lower socioeconomic status, my years in Rock County (reside in Janesville, work in Beloit), I've developed a rare lung condition (Bronchiectasis) while working long hours in a public school in Beloit. I drive by the Alliant plant every single day and feel like I'm losing another year off of my life as I drive through a smog that is supposed to be "clean burning natural gas".</p> <p>The sheer quantity of gas makes it impossible for this to be clean or remotely safe.</p> <p>As a resident who also happens to travel north in our beautiful state, the DNR is</p>	

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			<p>not being honest with itself nor us when it claims the wildfires are to blame for the air quality down here.</p> <p>Granted, they're indeed a factor as they are everywhere across the country, but they're by no means majority responsible for the pollution that spews out of that gas burning plant.</p> <p>Just sit and look at it, then add air quality monitors to the mix and find out if what is clear to the naked eye has any real impact on my lung function, the young minds that attend our schools, and the overall health of over 100,000 people.</p> <p>If there's nothing to hide, then please test with some oversight and share with the general public in the facts. If indeed the air monitoring network shows Beloit and other rock county residents are safe then we can all rest assured and move on.</p> <p>If not, then let's work together to make this a more inhabitable place.</p> <p>Thank you for your time</p> <p>Sincerely, Anthony Capozziello</p>	
29	Falicia Martinez, MPH, BSN, RN	5/29/24	<p>Emailed comment:</p> <p>My name is Falicia Martinez and I live in Beloit, WI. I am a Public Health Nurse, mother of three, and community advocate.</p> <p>Clean air is critical for our community's health. Please include data from the Wisconsin Department of Health Services and prioritize public health data into the annual monitoring network review.</p>	

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			<p>Priority should be given to counties that have the highest crude asthma hospitalization rates and under monitored air. All efforts to expand monitoring and preventing air pollution are critical for the health of Wisconsinites for generations to come.</p>	
30	Alexandria Zielinski	6/8/24	<p>Emailed comment:</p> <p>I am writing to request that the Wisconsin Department of Natural Resources consider the following for their 2025 air monitoring network plan given my expertise on the connection between the environment and health:</p> <ul style="list-style-type: none"> <li>-Please expand monitoring to include communities that are known to have higher density and number of local polluters, especially communities with large fossil fuel pollution sources from: transportation, industry, and fossil-gas burning power production.</li> <li>-Stop limiting air monitor placement based upon population and population density. The resistance to placing monitors in smaller cities and rural areas only adds to the rural/small city versus large city divide - both regarding health and other social drivers.</li> <li>-Incorporate the EPA environmental justice screen and other climate vulnerability measures into the network expansion consideration.</li> </ul>	

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			<p>Include data from the Department of Health Services and prioritize public health data in the annual monitoring network review. Priority should be given to counties that have the highest crude asthma hospitalization rates and under-monitored air.</p> <p>-Prioritize placing monitors in locations that capture local air pollution near high polluting sources that would negatively impact public health versus locations focused on measuring and reporting regional trends.</p> <p>-The long term goal should be expanding monitoring to include every county in Wisconsin, but given limited resources and staffing, communities with the greatest climate vulnerability and the highest reported industrial pollution should be prioritized with air monitoring expansion.</p> <p>-After community science efforts and an IQAir Report found Beloit to be the most polluted regional city in the U.S. in 2023, Wisconsin state regulators need to expand monitoring in the City of Beloit and throughout Rock County. This includes adding one-to-two PM2.5 monitors in Rock County and ensuring that all monitors are placed in areas that will capture the main sources of local pollution negatively impacting their community's health.</p>	

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			<p>Thank you! I'd be honored to speak with you all regarding this topic, so please don't hesitate to contact me.</p>	
<p>31</p>	<p>Victoria Gillet</p>	<p>6/11/24</p>	<p>I am a primary care physician in Milwaukee and I care deeply about how air quality impacts my patients. I see how many of my patients end up in the Emergency Room on poor air quality days. As someone who predominantly commutes via bike and public transit myself I notice how much worse I feel moving around the city on poor air quality days. There have been days when it was too dangerous to my health to bike, so I ended up driving - thus worsening air quality for those around me. Folks who don't drive, or who don't have access to accurate air quality metrics, they have no choice but to be exposed to health-worsening pollution.</p> <p>I am excited that the Wisconsin DNR has the opportunity to expand air quality monitoring. I hope that your long term goal is to have monitoring that includes every county in our state. I understand that there are limits on resources and staffing, and my priority as a health professional is a system that protects Wisconsinites health from the worst of air quality. Our current system does a good job of measuring and reporting regional trends, but is much less effective at informing high-risk groups of how to protect themselves. I'd therefore ask that</p>	



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			<p>you prioritize placing monitors in locations that capture local air pollution near high polluting sources that would negatively impact public health. I'd also ask that you include data from the Department of Health Services and prioritize counties that have the highest crude asthma hospitalization rates and incorporate the EPA environmental justice screen and other climate vulnerability measures into the network expansion consideration.</p>	
32	Susan Johnson	6/12/24	<p>I am a life-long resident of Wisconsin. I cherish the legacy Wisconsin had as a leader in conservation. I work for a present and future Wisconsin that returns us to our former position of leadership. I've lived in Rock County, Wisconsin for the past nineteen years. I was shocked and saddened to read, and hear about the IQAir Report that found Beloit to be the most polluted regional city in the U.S.</p> <p>Please expand monitoring to include communities that are known to have higher density and number of local polluters, especially communities with large fossil fuel pollution sources from: transportation, industry, and fossil-gas burning power production.</p> <p>Stop limiting air monitor placement based upon population and population density. The resistance to placing monitors in smaller cities and rural areas only adds to the rural/small city versus large city divide</p>	

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			<p>- both regarding health and other social drivers.</p> <p>Incorporate the EPA environmental justice screen and other climate vulnerability measures into the network expansion consideration.</p> <p>Include data from the Department of Health Services and prioritize public health data in the annual monitoring network review. Priority should be given to counties that have the highest crude asthma hospitalization rates and under-monitored air.</p> <p>Prioritize placing monitors in locations that capture local air pollution near high polluting sources that would negatively impact public health versus locations focused on measuring and reporting regional trends.</p> <p>The long term goal should be expanding monitoring to include every county in Wisconsin, but given limited resources and staffing, communities with the greatest climate vulnerability and the highest reported industrial pollution should be prioritized with air monitoring expansion.</p> <p>After community science efforts and an IQAir Report found Beloit to be the most polluted regional city in the U.S. in 2023, Wisconsin state regulators need to expand monitoring in the City of Beloit and throughout Rock County. This includes adding one-to-two PM2.5 monitors in Rock County and ensuring that all monitors are placed in areas that will capture the main sources of local</p>	

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			pollution negatively impacting their community's health.	
33	Joseph Stensland	6/4/24	<p>Emailed comment:</p> <p>As we are living in the only Wisconsin city with a refinery, we must have our own air-monitoring system. The current air monitor used to estimate our pollution is located in Duluth, MN, many miles from our city's refinery.</p> <p>Research shows that living in the zip code with a refinery brings with it a variety of health concerns, including an increased cancer risk. Particulate matter is especially damaging to longevity and health. People living in the area have commented on how often the refinery smells since its partial reopening in June of 2023 and full operation in late 2023. For our community's safety, Wisconsin must fully fund air-quality monitoring.</p>	<p><b>Response to comments related to adding a regulatory monitor in Superior, Wisconsin.</b></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. Environmental Protection Agency (EPA) sets National Ambient Air Quality Standards (NAAQS) for criteria pollutants, which include particulate matter (PM), nitrogen dioxide (NO<sub>2</sub>), ozone, carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>) and lead. The Wisconsin Department of Natural Resources (DNR) Air Management Program conducts ambient air monitoring in locations directed by federal requirements to measure concentrations of criteria pollutants for comparison to the appropriate NAAQS.</p> <p>All facilities in Wisconsin are required to comply with all state and federal air rules and regulations, regardless of whether they have an air permit or are exempt from permitting. Before the DNR can issue an air pollution control permit, state and federal laws and regulations require the DNR to assure that the worst-case air pollution emissions from a facility will not cause pollution concentrations in the vicinity to exceed National Ambient Air Quality Standards set by the EPA. This is done through extensive air quality analysis and dispersion modeling which includes consideration of emissions from nearby industry. National Ambient Air Quality Standards are air pollution concentrations set by the EPA at levels that protect public health.</p> <p>The DNR authorized an air pollution control permit for the Nemadji Trail Energy Center (NTEC) on 09/19/23. The air dispersion modeling analysis conducted for the NTEC permit review considered</p>
34	Pam Savoy	6/4/24	<p>Emailed comment:</p> <p>My name is Pam Savoy and I reside in Superior, Wi. I spoke with you back in March regarding air quality monitoring in Superior. I had concerns about emissions from the Superior oil refinery and added emissions from the proposed Nemadji Trail Energy Center (NTEC) gas plant. I am now writing to comment on the</p>	<p>The DNR authorized an air pollution control permit for the Nemadji Trail Energy Center (NTEC) on 09/19/23. The air dispersion modeling analysis conducted for the NTEC permit review considered</p>

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			<p>Wisconsin DNR 2025 Air Monitoring Network Plan.</p> <p>I continue to have concerns regarding the proposed NTEC project and the fact that Superior is home to the only oil refinery in the state of Wisconsin and does not have any government agencies monitoring air quality here.</p> <p>As you are aware, on February 7, 2024, the EOA finalized a rule for particulate matter NAAQS. The final rule lowered the primary PM2.5 annual NAAQS from 12.0 ug/m3 to 9.0 ug/m3. How will the residents of Superior be informed of how the combined emissions of our existing refinery and the proposed NTEC gas plant are affecting our air quality if Superior has no air quality monitors? How many cities in the US are home to both an oil refinery and a gas plant? In my research, I could not find any.</p> <p>Due to the health risks of living in a city with an oil refinery, I strongly feel that the residents of Superior should be protected by having air quality monitors in place regardless of whether or not NTEC begins operations here.</p> <p>Please consider my request that Superior be added to the DNR/EPA 2025 Air Monitoring Network.</p>	<p>emissions from the proposed NTEC facility as well as other industry in the area, including the refinery. The analysis predicted air pollution concentrations that could occur in air around the facility and found that these concentrations did not exceed any applicable National Ambient Air Quality Standards.</p> <p>The technical analysis DNR wrote for this permit is available for review. The Air Quality Review starts on page 102 of the Analysis and Preliminary Determination. Access permit documents using DNR's Air Permit Search Tool at <a href="https://apps.dnr.wi.gov/warp_ext/AM_PermitTrackingSearch.aspx">https://apps.dnr.wi.gov/warp_ext/AM_PermitTrackingSearch.aspx</a>:  - Enter 816127840-P01 in the "Permit No:" space, and click "Search"  - Click on the "Permit and Permit Applications" tab along the top.  - Click "Select" next to permit number 816127840-P01.  - Click "Dwnld" next to the document for review.</p> <p><b>Response to Comments #33-39</b></p>
35	Patty Lier	6/2/24	Emailed comment:	

Comment #	Commenter	Date of Comment	Comment	Response
			<p>Hello. My name is Patty Lier and I am a resident of Superior, Wisconsin. I am writing to express my comments about the 2025 Annual Meeting.</p> <p>We are the only county in the state that has a refinery and we do not have our own air monitoring system. The air monitor used by the DNR is located in Duluth MN which is several miles away.. Research shows that living in the zip code of a refinery brings with it health concerns and increased cancer risk. The refinery has now reopened after its explosion in 2018 and seems to have more stacks and is a bigger operation than previously. People living in the area have commented on how often the refinery smells since it's partial reopened in June of 2023 and full operation in late 2023. Many citizens, including me, feel there is a credibility issue with the air monitor being located so far from the city that actually has the refinery. This refinery is located close to the center of our area. Much of the city of 27,000 citizens live within a 3 mile radius of this refinery.</p> <p>We also live in a basin and with Lake Superior's power, the air can swirl around and not blow out for several days at a time. Our weather here in Superior can be very different than in Duluth, MN. I would think that the state would be very interested in following our city's air quality because of the refinery. There is also another proposed gas plant called</p>	

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			<p>Nemadji Energy Trail Center; NTEC, a 650 megawatt power plant that the DNR issued an air permit for in late 2023. When that permit was granted in Sept 2023 the air monitoring had to be done using cities in Wisconsin outside our area because the refinery was shut down for rebuilding from 2018 to mid 2023. That has raised a lot of questions and concerns from citizens as they were surprised and upset to discover that Superior did not have its own air monitor system.</p> <p>I am asking that Superior, WI be given special consideration to have our own air monitor system. I know the DNR website mentions the Purple Air Monitors so that citizens can monitor the air also, but with a refinery, we should be given special consideration from the state to keep our citizens as informed and healthy as possible. We are the ones living with the risk from having a refinery and we should have the most accurate information available to us so we can protect our families and ourselves. --Patty Lier</p>	
36	Lee Sandok Baker	5/29/24	<p>Written comment in meeting chat:</p> <p>I would like to express concern as a Superior resident about the lack of DNR air monitoring in Superior, as host of the state's only oil refinery, and proposed site for a new gas electric plant.</p>	

Comment #	Commenter	Date of Comment	Comment	Response
37	Kathryn McKenzie citizen member Douglas County Land Conservation committee	6/7/24	<p>Emailed comment:</p> <p>I live in South Superior and have had a purple air monitor on my home since after the Husky explosion. It is similar to one that the EPA uses to test. I know that the cost is less than \$300. I am wondering what is stopping the WDNR from monitoring the air in Superior. I am told that we pay an extra \$50M per year in health related expenses. Two months ago my husband died with a collapsed lung and with leiomyosarcoma, a rare cancer that is not rare in this area. When the neighbor burns in his burn barrel and starts his wood burning indoor system I know and can read it on my computer. When the fires of W Canada and the U.S. change the quality of air at my home, I know.</p> <p>Don't the citizens of Superior deserve more than they're getting from our government? When the Husky explosion happened, our DNR had to "borrow" air monitors from MN because there were none here. Tom Markey from UW Superior used to have a portable air monitor that gave the DNR readings in Superior. Murphy oil used to self monitor the air. How and when will this happen again? When laws change, are they meant to protect the citizens or continue to have a "sacrifice zone" so that corporations can continue to increase profits. Murphy oil used to be called "our little gold mine".</p>	

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			<p>The time to protect the health of citizens is now. Who makes these decisions and for whom? The time to help us all is now. Please put more air monitors downwind of facilities in Superior.</p>	
38	Jenny Van Sickle, Superior City Council	6/10/24	<p>Emailed comment:</p> <p>I recently read your quote that appreciated Beloit's citizen monitoring program because their data would be valuable...I agree and suggest that if data is valuable ..then we need to deploy more monitors.</p> <p>Where monitors are lacking, the state is sometimes relying on the DNR's booklet and/or plucking data from monitors that permit applicants suggest regardless of proximity, maintenance, verification of accuracy or absence of tampering. Citizens need to be prioritized by state agencies in their programs, permitting, and expenses. Rather than language that denies harm (eg. "no significant impact") state employees need to prioritize the wellbeing of human beings, water, and plant life health.</p> <p>Deploying more monitors is just one way to actually take stock of how neighboring pollution, local projects, and decisions are impacting communities to which the state is responsible.</p>	



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39	Susan Betz	6/8/24	<p>Emailed comment:</p> <p>I live in Superior, WI. There is no air monitoring though we have an asphalt plant. Twice this winter I smelled it's acrid fumes. I hope this doesn't happen during the summer. I want to be outside and in my yard. It smelled as if someone was paving an asphalt road a block away. That pollution is not healthy. It was a mile or two away from me.</p> <p>I am writing to request that the Wisconsin Department of Natural Resources consider the following for their 2025 air monitoring network plan:</p> <ul style="list-style-type: none"> <li>-Please expand monitoring to include communities that are known to have higher density and number of local polluters, especially communities with large fossil fuel pollution sources from: transportation, industry, and fossil-gas burning power production.</li> <li>-Stop limiting air monitor placement based upon population and population density. The resistance to placing monitors in smaller cities and rural areas only adds to the rural/small city versus large city divide - both regarding health and other social drivers.</li> <li>-Incorporate the EPA environmental justice screen and other climate vulnerability measures into the network expansion consideration.</li> </ul>	

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			<p>Include data from the Department of Health Services and prioritize public health data in the annual monitoring network review. Priority should be given to counties that have the highest crude asthma hospitalization rates and under-monitored air.</p> <p>-Prioritize placing monitors in locations that capture local air pollution near high polluting sources that would negatively impact public health versus locations focused on measuring and reporting regional trends.</p> <p>-The long term goal should be expanding monitoring to include every county in Wisconsin, but given limited resources and staffing, communities with the greatest climate vulnerability and the highest reported industrial pollution should be prioritized with air monitoring expansion.</p> <p>-After community science efforts and an IQAir Report found Beloit to be the most polluted regional city in the U.S. in 2023, Wisconsin state regulators need to expand monitoring in the City of Beloit and throughout Rock County. This includes adding one-to-two PM2.5 monitors in Rock County and ensuring that all monitors are placed in areas that will capture the main sources of local pollution negatively impacting their community's health.</p>	

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40	Cristina Carvajal Executive Director of Wisconsin EcoLatinos	5/29/24	<p>Verbal comment from public meeting:</p> <p>“I’d like to learn a little bit about the monitoring of lead. My concern about it is because of the use of aviation gas by small aircrafts in smaller airports. I know there has been an issue for some communities like Middleton Wisconsin has a small airport right in the middle of town very close to all the schools. It’s not clear, there no level, there is no safe level of lead for our children, and it is my concern that we don’t have data to evaluate how this pollution is affecting the air quality in our communities.”</p>	<p><b>Response to Comment related to air monitoring for lead.</b></p> <p>In October, 2016 – the Environmental Protection Agency (EPA) retained the National Ambient Air Quality Standard (<a href="#">NAAQS</a>) for <a href="#">lead</a>. The lead (pb) monitoring network design requirements (40 CFR part 58, Appendix D, paragraph 4.5) include two types of monitoring sites—source-oriented monitoring sites and non-source-oriented monitoring sites—as well as the collection of a year of Pb-Total Suspended Particles (TSP) measurements at 15 specific airports nationwide. At a minimum, there must be one source-oriented site located to measure the maximum Pb concentration in ambient air resulting from each non-airport Pb source which emits 0.50 or more tons of Pb per year and from each airport which emits 1.0 or more tons of Pb per year. Based on the 2018 and 2019 Wisconsin Air Emission Inventory no facilities in Wisconsin had lead emissions greater than 0.5 TPY therefore, no facilities in the state, and specifically Dane County are federally required to monitor for lead. Additionally, monitoring agencies are also required, under 40 CFR part 58, Appendix D, to conduct non-source-oriented lead monitoring at the NCore sites in metropolitan areas with a population of 500,000 or more. Wisconsin’s NCore site is located in Horicon and does not meet the population threshold for the lead monitoring requirement. Due to resource constraints the DNR would not be able to support non-required, unfunded lead monitoring.</p> <p><b>Comment # 40</b></p>