

2027 Air Monitoring Revised Network Plan Response to Comments

Comment #	Name of Commentor	Date of Comment	Comment	Response
1	Pam Savoy	6/6/26	<p>Email comment:</p> <p>Hello Mr. Wolf, I am writing to make comment on the WDNR 2027 air monitoring network plan. Superior, WI is home to several industries that produce air emissions, including the only oil refinery in the state of Wisconsin. The nearest regulatory air monitor is located in Duluth, Minnesota at Laura MacArthur school. It is located approximately 3 miles upwind of the industry here in Superior. The data from that regulatory air monitor in Duluth Minnesota has been used in past air permit issuance. Due to the fact that this air monitor is upwind of our industry I have doubts that this air monitor is truly representative of the air quality in Superior. I question how the data from that air sensor is accurately representing air quality in Superior/Douglas County when it did not register the effects of the 2018 Husky oil refinery explosion and placement of the monitor is upwind of our industry.</p> <p>The predominant westerly winds we experience for almost 80 percent of the year, carry pollutants away from the air monitor in Duluth, MN. The EPA advises all counties with oil refineries to have a regulatory PM2.5 air monitoring program. Please consider placement of an air monitor in Superior, as the absence of a regulatory PM2.5 monitor in Douglas County falls below the EPA recommendations.</p> <p>Thank you, Pam Savoy</p>	<p>Monitoring Network Overview: The purpose of the ambient air monitoring network is to measure pollutant concentrations <u>regionally</u> across the state in the ambient (outdoor) air over <u>long periods of time</u> as required by the Clean Air Act (CAA). The main goals of the ambient air monitoring network are:</p> <ul style="list-style-type: none"> • Ensuring the National Ambient Air Quality Standards (NAAQS) are met statewide • Identifying long term pollution trends • Supporting air pollution forecasting and alerts for public health and welfare • Providing real-time air quality and Air Quality Index (AQI) map information • Assessing large scale air quality events • Supporting air quality modeling <p>The statewide monitoring network is just one part of the Wisconsin Department of Natural Resources (DNR) Air Management Program. In addition to monitoring, the program has permitting, planning and compliance CAA requirements that must work together to support improving air quality across the state.</p> <hr/> <p>The statewide monitoring network is not intended to tell us what specific sources emit or determine if specific sources are complying with their air permits. Air Permit compliance of individual sources is assessed through regular compliance inspections, stack testing, and other reviews and investigations.</p>

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				<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 six criteria pollutants, which include particulate matter (PM), nitrogen dioxide (NO₂), ozone (O₃), carbon monoxide (CO), sulfur dioxide (SO₂) and lead (Pb). 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. The number and type of monitor are based on complex requirements prescribed in the Clean Air Act and ultimately approved by EPA. These requirements include population census data, establishing regional coverage for certain pollutants, meeting quality assurance requirements and measuring maximum concentration levels. Monitor locations are specifically chosen not to be representative of individual sources or industries.</p> <p><u>PM2.5 NAAQS & PM2.5 Monitor Location Considerations</u></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. On February 7, 2024, the EPA finalized a more stringent NAAQS for PM2.5. 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 did not make final designations for the new PM2.5 NAAQS by February 2026 based on 2022-2024 monitoring data however the 2024 PM NAAQS remains in effect. Along with reviewing the level of the NAAQS, the EPA also completed a review of the monitoring requirements for PM2.5 and finalized updated requirements on February 7, 2024. EPA determined that Wisconsin’s existing PM2.5 monitoring network met all</p>

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				<p>minimum monitoring requirements and no new monitors were necessary. Comments regarding PM2.5 monitor site locations and additional monitors are best focused directly at EPA during the time frames when the PM2.5 NAAQS are being reviewed or revised. All areas of Wisconsin are below EPA's more stringent NAAQS for PM2.5 based on the 2023-2025 monitoring data values. The DNR does not currently have the authority or funding to implement and enforce air quality standards stricter than federal standards.</p> <p><u>PM2.5 Pollution Overview</u> PM2.5 is considered a regional pollutant rather than a localized, single point-source pollutant. Some PM2.5 is directly emitted by certain sources, however a significant percentage of PM2.5 is produced through complex PM2.5 precursor chemical reactions in the atmosphere and often travel long distances (100s-1000s of miles) based on meteorology. This means PM2.5 levels span wide regions of the state and monitors are strategically placed in representative areas of the state rather than being associated with any single source of emissions. Areas with the highest regional PM2.5 levels are often in locations with the highest population (i.e. large urban areas) and in Wisconsin, that is Madison and Milwaukee.</p> <p><u>PM2.5 Sensors & the 2025 EPA Superior and Beloit Sensor Study</u> In recent years, EPA has evaluated the use of low-cost air quality sensor technology as a means of providing broader geographic air monitoring coverage beyond the limitations of the current regulatory monitoring networks for some pollutants including PM2.5. Several PM2.5 sensors are currently included in the EPA AirNow Fire & Smoke map providing real time PM2.5 data for Port Washington, Beloit, and Superior.</p>

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				<p>Low-cost sensor data is beneficial for making daily health decisions based on current air quality and for looking at general trends. Unlike EPA certified Federal Reference Method (FRM) and Federal Equivalent Method (FEM) monitors, low-cost sensors lack the ability to perform the quality assurance, accuracy, precision and calibration tests necessary for being regulatorily defensible.</p> <p>In 2026, the EPA provided the DNR with a summary of an analysis comparing publicly available 2025 PM2.5 air sensor data from both Superior and Beloit to regulatory air monitoring data collected in nearby Duluth, MN and Rockford, IL respectively. Data for these analyses were accessed and analyzed by the EPA using the Air Sensor Network Analysis Tool, a free, opensource R shiny application that can be used to analyze air sensor network data to evaluate sensor performance and local air quality conditions.</p> <p>Sensors in Superior and Beloit showed similar trends to the values of the regulatory monitors located in nearby Duluth, MN and Rockford, IL. Annual mean concentrations from the sensors for 2025 in both Superior and Beloit were near or well below levels measured at the regulatory monitoring sites in Duluth and Rockford. The 2025 annual mean of all sensors and monitors in Superior and Beloit were below EPA’s 2024 PM2.5 NAAQS of 9 ug/m3 after removing the data for several wildfire smoke influenced days. For more information on the details of EPA’s 2025 study, please contact the U.S. EPA Region 5 Air and Radiation Division.</p> <p><u>PM2.5 Modeling</u> Along with air quality monitoring, 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. Before the DNR can issue an air pollution control permit, state and federal laws and</p>

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				<p>regulations require the DNR to conduct modeling 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.</p> <p>The DNR issued air pollution control permits for the rebuild of the Superior Refinery. Air dispersion modeling analysis was conducted in support of those permits considering emissions from the Refinery as well as other industries in the area. The analysis predicted air pollution concentrations that could occur in the air around the facility and found that these concentrations did not exceed any applicable National Ambient Air Quality Standards.</p> <p><u>Refinery Monitoring Requirements</u></p> <p>The DNR is unaware of any EPA recommendations for clean air agencies to operate a regulatory PM2.5 monitor in counties containing a refinery. In 2015, the U.S. EPA issued the Petroleum Refinery Sector Rule, an air toxics regulation that required, among other things, refineries continually monitor the concentration of benzene emissions along their property boundary (i.e., fenceline). In the event that benzene concentrations exceed the action level set by EPA, refineries are required to identify the root cause and take corrective action to reduce benzene emissions to below the action level. Refineries began reporting monitoring data to EPA in May 2019 and continue to report on a quarterly basis. For more information on Benzene fenceline monitoring please visit EPA's Benzene Fenceline Monitoring Dashboard.</p> <p>The public availability of the fenceline monitoring data provides transparency and allows for public oversight. The Benzene fenceline data from the Superior Refining Company is available to the public so they can stay informed about benzene pollution sources and refinery efforts to keep benzene emissions below the benzene action level. Fenceline</p>

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				<p>Benzene data from the Superior Refining Company is accessible to the public through creating an account on EPA's Compliance and Emissions Data Reporting Interface. The Superior Refining Company submits benzene fence-line monitoring data on a quarterly basis as per the rule and has never exceeded the Benzene action level of 9µg/m³.</p> <p><u>Funding for Wisconsin's Air Monitoring Network</u> The DNR's air monitoring network currently meets all applicable monitoring requirements set by the EPA's Code of Federal Regulations (40 CFR Part 58). This monitoring network is funded by federal grant money. The DNR does not receive funding to support monitoring beyond what is federally required. Without new sources of long term and stable funding, it is not possible to conduct new monitoring beyond what is federally required. The future of the federal grant money responsible for funding Wisconsin's network continues to be uncertain and has remained stagnant for decades while operational costs continue to rise.</p>
2	N. Joanna Foor	6/6/26	<p>Email comment:</p> <p>As a resident of Superior, WI, I find it shocking that Wisconsin's only oil refinery, located in Superior, Douglas County does not have a PM2.5 monitoring program that the EPA advises it to have. The absence of a regulatory PM2.5 monitor in Douglas County falls below EPA recommendations and it's citizens expectations. The State of Wisconsin owes it's citizens the security of knowing the air is safe to breathe now and for the generations to come.</p> <p>Sincerely, N. Joanna Foor</p>	Please see response to comment #1

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3	Patty Lier	6/9/26	<p>Email comment: Thank you for this time to make a public comment. I am writing to advocate for a regulatory air monitor in Douglas County, WI. We understand that DNR has monitors in place to gather information about the ambient air quality and not localized air pollution, but the DNR is also responsible for the environmental health of the state's communities. The DNR is the one to issue the permits to industry which allows them to operate in the community. These industries can then impact the health of the community which surrounds them. The cumulative effect of industrial pollution in localized neighborhoods should be followed more closely.</p> <p>Research shows the people living within 0-10 miles of a refinery are at increased risks of multiple health problems. Douglas Co does in fact have higher than average rates of several cancers and COPD ER visitations than the state average per the CDC and the Wisconsin Department of Health Statistics. Our entire city of 27,000 lives within 3 miles of this refinery and other heavy industry along the lake shore of the city. The DNR also publishes an Air Quality Trend by County report and despite Douglas Co having the 8th highest emissions in the state per the 2024 Wisconsin Emissions Data Dashboard, and the county that has the state's only refinery, is not part of that survey. One would think it would be important that we are on that survey and part of the network plan, especially after a reopening of a refinery that had a major explosion that was not recorded on the closest MN air monitors. The refinery also has had several "upsets" and violations since reopening. One of the facilities in this area also provides an annual stipend to the residents near there to wash their houses because of the dust that settles everywhere. Another facility is near a low income area with a higher population density. Our topography is different as we live in the Lake Superior Basin</p>	<p>Please see response to comment #1.</p> <p>Additionally: Moving a PM2.5 monitor from a location currently in attainment to a new location lacking a monitor is a complex, expensive and resource intensive task. Monitoring history, geographic coverage, population requirements and all other criteria pollutant monitoring requirements at the current location must be taken into account before any decisions can be made. All areas of Wisconsin are currently in attainment of EPA's more stringent 2024 Annual NAAQS for PM2.5 however many monitoring sites are required to operate regardless of attainment status due to population requirements prescribed in the Clean Air Act and further documented in Appendix A of the annual network plan.</p>

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			<p>so the monitors that are elevated above the Basin, may show a different air quality than what is down by the shoreline on a fairly regular basis.</p> <p>In the interest of our community health and the future permitting of potential industry, Douglas County should be part of the Wisconsin Network Plan and the County survey. We understand that funding is a major issue, but perhaps there can be a different approach to where monitors from areas that have been in attainment for a long time can then be moved to areas of question. This would help with the cost and also add to a larger area of monitoring for a more accurate picture of the areas the DNR considers rural but with with heavy industry. It is just a thought. The EPA should also be taking the health of rural communities that live near heavy industry with known health risks into account and help fund the DNR to look into th the dataese areas that show there is a possible problem. The focus seems to always be on densely populated areas and less populated areas health does not seem to be an important factor.</p> <p>Thank you for opening the public comment and explaining how and why air monitoring is done. We just think there could be a few other solutions to assist less densely populated communities that are questioning air quality when they have health statistics of concern alongside heavy industry that have known health risks and violations. It is difficult for communities to take on this responsibility. We lack knowledge, expertise and resources.</p> <p><i>Patty Lier</i></p>	
4	Lynn Wohlwent	6/9/26	<p>Email comment: Dear Benjamin Wolf, I'm asking for extending air monitoring to Superior, Wisconsin as part of the public comments for the Draft Annual 2027 Monitoring Network Plan.</p>	Please see response to comment #1

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			<p>Wisconsin’s only oil refinery is located in Superior, Douglas County. The EPA advises all counties with oil refineries to have a regulatory PM2.5 monitoring program. The absence of a regulatory PM 2.5 monitor in Douglas County falls below EPA recommendations.</p> <p>Thank you, Lynn Wohlwend Superior, Wisc.</p>	
5	Henry O’Davis	6/10/26	<p>Email comment: Dear Mr. Wolf, I am writing to comment in response to the June 8, 2026 hearing r.e. the Wisconsin DNR 2027 Air Quality Monitoring Network Plan.</p> <p>Although I was unable to attend the online meeting, I'd like to share some comments regarding the Superior Refinery: If I understand correctly, the refinery is processing more of a different kind of oil than they originally anticipated, some kind of a darker crude maybe? And this process results in greater safety concerns because of the requirements for limited NOx emissions.</p> <p>If this is the case, why is the refinery trying to process something it really wasn't designed for? Perhaps rather than automatically allowing the refinery to emit more pollutants, the WDNR should require the refinery to operate within its original license. I.e., if the refinery wants to process more of a certain type of oil, let it update the plant so that this can be done safely, and within the currently permitted emission levels.</p> <p>If the refinery doesn't want to make the investment to properly handle its current processes, or if it's impossible to do so, that's okay. All businesses face operational limitations. And since our community gets absolutely no benefit from their increased emissions (none, just degraded air and water quality), why would we say "yes" to their request?</p>	<p>Please see response to comment #1</p> <p>Additionally: Questions concerning the technical details of a specific air permit are outside the scope of Wisconsin’s ambient air monitoring network and therefore cannot be directly addressed in the annual network plan response to comments.</p> <p>For more information on permitting actions addressing changes in operation at Superior Refining Company, please refer to the department’s Air Permit Search Tool.</p> <p>The air permit which specifically addressed the changes in crude processed at the refinery is 19-RAB-057.</p> <p>Once on the Air Permit Search Tool:</p> <ul style="list-style-type: none"> • Enter 19-RAB-057 in the “Permit No:” space, and click “Search” • Click on the “Permit and Permit Applications” tab. • Click “Show Inactive Permits”. • Click “Select” next to permit number 19-RAB-057. • Click “Dwnld” next to the document name(s) of interest.

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			<p>So,</p> <ol style="list-style-type: none"> 1. I am in favor of stringent restrictions on the refinery emissions. Please do not approve an increase of emissions. 2. Since the refinery seems to be the only party with the resources to fund an off-site EPA type air monitor, this should be a condition of its continued operation. <p>Mr. Wolf, I'm happy to discuss these options with you if you're interested.</p> <p>Respectfully, Harry O'Davis</p>	<p>There is also a recently issued permit authorizing a NOx emissions increase at this facility. That permit along with the response to comments can be found by following the same instructions above but typing in permit 25-PSD-058 instead.</p> <p>For any further specific questions on permitting actions for Superior Refining Company, please contact Beth Perk at (608) 267-0573 or Beth.Perk@wisconsin.gov.</p>
6	Kathryn McKenzie	6/12/26	<p>Email comment: Dear Mr. Wolf, For 73+ of my 84 years I have lived in Superior. For 52 of those years I lived downwind of the Superior refinery. I most sincerely advocate for the WDNR to follow EPA guidelines and install an air monitor downwind and / or in any other necessary directions from the Superior refinery. In my opinion, the Duluth, Bad River, Ashland, Rhinelander monitors are insufficient.</p> <p>Regarding the health of the citizens of Superior and other nearby WI residents I recall that when I was a member of the Douglas County Board of Health that agreements were negotiated and signed with medical communities in MN including Duluth and Mayo Clinic and the representatives in the nursing section of Douglas County's Health Department. These agreements stipulated that medical data derived from WI residents seeking medical care in MN be shared with Health Departments in WI including the counties and the state. I interpret that to include the CDC and other</p>	<p>Please see response to comment #1</p>

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			<p>national centers for health records I recently read the following: Health records do not automatically transfer across state lines. When you are treated in Duluth, MN, those records stay within that Minnesota health system and are only shared with Wisconsin providers if you specifically authorize the transfer. [1] The standard process to transfer your records to a Wisconsin provider involves the following steps:</p> <ol style="list-style-type: none"> 1. Request Forms: Contact the Health Information Management (HIM) department of the Duluth hospital or clinic where you were treated (e.g., <u>Aspirus Health Care</u> or <u>Aspirus St. Luke's</u>). 2. Written Consent: Fill out and sign an Authorization to Release Protected Health Information form, which complies with Minnesota's strict health record laws. [1, 2] 3. Specify Destination: Indicate your new or current Wisconsin healthcare provider so the Duluth facility can send the records directly to them. [1, 2] <p>In "all" of my many years of receiving care in Duluth including Essentia, St. Mary's Hospital, In Motion Therapy, the Duluth Clinic. I have never requested or been informed of this policy. I consider myself to be an informed recipient of services and after learning of this policy I am angered. I believe that the data in the health systems for which you may rely for decision making must be skewed. I hope that you will take my comments into consideration when this decision for air monitoring is made. According to past EPA administrator Gina McCarthy in my paraphrase -Superior's resident health has been waived in the interest of industry and the people's health needs forgotten.</p> <p>Kathryn McKenzie</p>	

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7	Grace Perret	6/12/26	<p>Email comment: Hi Benjamin!</p> <p>I am deeply concerned about the lack of air quality monitoring and the ongoing trend to shrink the monitoring network. Current regulatory monitor placement fails to capture what the majority of Wisconsinites are breathing! Please expand monitoring to include communities that are known to have a higher density and number of local polluters, especially communities with large fossil fuel pollution sources (i.e., heavy industry and fossil-fuel-burning power production).</p> <p>These communities deserve regulatory monitoring and protections! Please do not limit air monitor placement based on population or population density. This continued resistance to placing monitors in smaller cities and rural areas only adds to the disparity between rural/small cities and large cities.</p> <p>Let's keep our communities healthy!</p> <p>Thanks, Grace Perret</p>	Please see response to comment #1
8	Eric Ido-Bruce	6/12/26	<p>Email comment:</p> <p>To the Department of Natural Resources,</p> <p>I am a registered nurse in Wisconsin and have worked extensively with patients who suffer from respiratory and breathing issues in both rural and urban communities. It is imperative that all Wisconsinites have access to clean, well-monitored air, which is why I am asking you to expand the air monitoring network throughout the state. As a nurse, I see firsthand how air quality shapes health outcomes. Conditions like asthma, COPD, and cardiovascular disease are all worsened by exposure to fine particulate matter (PM2.5) and ozone. When my patients struggle to breathe, their ability to work and care for their families is compromised. And when</p>	Please see response to comment #1

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			<p>we don't have reliable air quality data, neither they nor I can make informed decisions about their care and daily activities. Right now, Wisconsin's regulatory monitoring network leaves most of the state in the dark. According to the American Lung Association's State of the Air Report, the Wisconsin Department of Natural Resources only maintains regulatory ozone and PM2.5 monitors in 27 of our 72 counties. That means the majority of Wisconsinites in both rural and urban communities alike are breathing air that is simply not being measured. We cannot protect what we do not monitor. Expanding the air monitoring network is a foundational step toward health equity and informed public health policy. My patients deserve to know what they are breathing, and their communities deserve the data that drives protective action. I urge you to invest in closing these monitoring gaps and ensuring that every Wisconsin community has access to this critical information.</p>	
9	Richard A. Dart	6/10/26	<p>Email comment: Dear Mr. Wolf, Writing as a member of Healthy Climate Wisconsin (HCW), and a semi-retired physician, but writing on my own behalf, in support of calls by the HCW to address and increase air monitoring by the DNR in areas now less well served.</p> <p>It is my understanding that while areas with air monitoring in many urban areas with significant air quality issues is reasonably good. However, at present there are gaps in that only 27 of 72 counties have air monitoring being done. As many counties are more rural, but have significant air quality issues, it is respectfully requested that consideration for increasing DNR air monitoring in the areas where gaps occur.</p> <p>We, in HCW, are available as a source for further information from our perspective, if desired.</p>	Please see response to comment #1

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			<p>Thank you for your consideration. Respectfully, Richard A. Dart, MD, MACP</p>	
10	Jonathon Patz	6/11/26	<p>Email comment: Benjamin, I am a physician and public health professor living in Madison, WI. I have large concerns that DNR's air pollution monitoring plan is woefully inadequate to protect public health. According to the American Lung Association State of the Air Report, the DNR currently only has regulatory ozone and PM2.5 air monitors in 27 of our 72 counties. While 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. I think it's essential to Include data from the <u>Department of Health Services</u> and prioritize public health data into the annual monitoring network review. Priority should be given to counties that have the highest crude asthma hospitalization rates and under-monitored air. Clean air is critical for the health of Wisconsinites. Our state's continued (ill-advised) dependency on burning fossil fuels for transportation, industry, and energy generation, we must advocate for more comprehensive regulatory air monitoring across the state, especially until we transition to cleaner energy sources. All efforts to expand monitoring and prevent air pollution are critical for our health for generations to come.</p> <p>Thank you for your attention to this matter. Sincerely, Jonathan Patz, MD, MPH</p>	Please see response to comment #1

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11	Jayne Black	6/5/26	<p>Email comment: Hello Benjamin, My name is Jayne Black, and I am the Wisconsin Field Organizer for Moms Clean Air Force . Our Wisconsin membership is over 17,000 all moms, dads and caregivers working to protect children's health from air pollution. I feel very strongly and am asking for expanded regulatory monitoring (PM2.5) in Beloit, Rock County, Wisconsin. This is greatly needed for the children and families in this county. Nothing is more important than regulating and monitoring the air our children breathe. Thank you so much, Jayne Black Wisconsin Field Organizer (Consultant)</p>	Please see response to comment #1
12	Cristina Carvajal	6/11/26	<p>Email comment:</p> <p>Wisconsin Ecolatinos is a strong advocate for clean air and raising awareness about air pollution exposure in frontline communities. We have actively supported Beloit and the surrounding areas in their efforts to reduce pollution. A primary concern for our organization and other community partners is the lack of data from a local PM2.5 regulatory monitor, which impedes our understanding of air pollution and its sources. Reports from various organizations and our Purpleair monitor indicate high levels of PM2.5 in the area. As we engage with the community, we often encounter questions about the complexity of the data in these reports. The models and standards used can make it challenging to explain to community members why the Department of Natural Resources (DNR) does not recommend establishing a regulatory monitor in this region. Providing a clear explanation of the data and the decision-making process is essential for helping community members understand the air quality findings. This understanding will enable them to</p>	<p>Please see response to comment #1</p> <p>Additionally: One comment referenced the difficulties of communicating complex air quality data, models and standards to community group members. The DNR recognizes the ongoing difficulty of communicating the complex environmental regulations housed in hundreds of pages of the Clean Air Act as well as the department’s implementation of the CAA. The Annual Network Plan public meeting and presentation along with the response to comments is an effort to more clearly communicate these things. Additionally, we continue to be committed to ongoing community engagement including the development of summary materials.</p> <p>One comment referenced the inequity between the city of Madison’s network of air sensors and smaller communities like Beloit that lack the same infrastructure. The City of Madison applied for and received a one-time federal grant to purchase and install a network of air sensors across the city.</p>

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			<p>participate meaningfully in the review of the 2027 Air Monitoring Network Plan.</p> <p>We appreciate your efforts to present this information in an approachable manner, even though we disagree with the DNR's recommendations and the standards being followed. The absence of a regulatory monitor in the Beloit area results in significant reliance on extrapolated information, leaving many questions unanswered.</p> <p>We recognize the considerations taken into account when recommending monitoring, but we believe that Environmental Justice should also factor into these considerations. Frontline communities are exposed to pollution at higher rates than others, and resources should be allocated equitably. For instance, the city of Madison has implemented a network of 60 air monitors funded by federal resources to assess its air quality, while residents in Beloit have to purchase a PurpleAir monitor to obtain air quality data themselves.</p> <p>Thanks for the opportunity to provide these comments.</p> <p>Sincerely, <i>Cristina Carvajal</i> <i>Executive Director</i> <i>Wisconsin EcoLatinos</i></p>	<p>Similar one-time grants are available to other municipalities including the city of Beloit, universities and community groups.</p>
13	Brittany Keyes	6/8/26	<p>Verbal comment at public meeting: Well, thank you for the opportunity to speak and for the presentation on this plan. My name is Doctor Brittany Keyes. I'm a physical therapist and the Clean Air policy manager with Healthy Climate Wisconsin. We are a statewide nonprofit of doctors, nurses, therapists, public health professionals working to address and prevent large sources of pollution that harm our air, water, land and health of our patients and our communities. As part of this, my work with healthy climate Wisconsin, I have been engaging with the DNR and the Public Service</p>	<p>Please see response to comment #1</p> <p>Additionally: One comment referenced the importance of including all air quality data when making regulatory decisions regardless of whether that data qualifies as an exceptional event. Exceptional events are unusual or naturally occurring events that can affect air quality but are not reasonably controllable and are not addressed through the normal planning and regulatory process established by the Clean Air Act (CAA). The CAA section 391(b)(3)(B) allows state agencies to exclude air quality monitoring data influenced by exceptional events</p>

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			<p>Commission for the last couple of years, and I'm a former elected official from Beloit.</p> <p>I also serve as the convener with the Stateline Clean Air Coalition. The Stateline Clean Air Coalition is a group of over 7 nonprofits that was established in 2024. Due to the concerning high levels of air pollution in the Wisconsin, Illinois State line area, the under monitoring or lack of lack or limited regulatory monitoring and the poor public health metrics and the high reported industrial pollution. So as far as the ask with the air Monitoring network plan, we would like to see, we want to recognize that when it comes to ozone and particular matter, there's less than half of our counties that have regulatory monitoring only 29 out of 72 and when it comes to passing grades, I appreciate that the Wisconsin DNR looks at observes exceptional event demonstrations where it omits data from some of the high pollution days associated with climate change. As you shared the impacts of wildfire smoke.</p> <p>Unfortunately, we are in a time where the climate crisis and the symptoms and the trends are part of our new normal. So in addition to looking at how can we expand our air monitoring network, especially in areas where there's high reported industrial pollution.</p> <p>It's it's really important to include all the data that our communities and our patients are breathing and so not to observe the or adapt the exceptional events demonstration, but to include all data because that is what we are living, breathing and what we are seeing in our hospitals and clinics. The Stateline Clean Air Coalition and and myself have been engaging the DNR for a number of years following the DNR's recommendation to engage in community monitoring. Unfortunately, the DNR is not able to use or utilize community level monitoring when it comes to protecting communities. Communities such as Beloit WI and Superior WI with the only oil refinery in the state should have more comprehensive regulatory monitoring.</p>	<p>from use in regulatory determinations such as exceedances or violations of the NAAQS. This includes the exclusion of ozone and particulate matter (including PM2.5) data impacted by wildfire smoke. Exceptional event demonstrations do not result in the removal of data from the record, rather an approved demonstration flags the affected data and prevents it from having regulatory significance.</p> <p>One comment referenced the current backlog of Title V operation permits resulting in the potential to affect regional air quality and safety. A fully funded and operational Title V permit program is critical for meeting Wisconsin's air quality goals however the lack of a renewed operation permit does not mean a facility does not have to comply with its current operation permit (including monitoring and recordkeeping) or is out of compliance with the Clean Air Act.</p> <p>If a facility submits a timely renewal application, they are allowed to continue to operate under the conditions in the current operation permit and any new/modified conditions specified in construction permits issued after the operation permit expired.</p>

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			<p>It has been mentioned that the these pollutants are regional and yes while they are regional the sources, there are numerous sources across the state that emit high levels of these precursors, as well as these pollutants. There was a report from Boston University that found that from the particulate matter reported by and permitted by the DNR, but reported by Alliant Energy in Rock County it posed significant increased risk of cancer to residents living within a two mile or two kilometer radius from the plant.</p> <p>So while these are our regional pollutants, they do pose a significant increase health risk to the folks who live closest and that cannot be disregarded.</p> <p>The DNR is the one legal entity that is here to protect us from the harms of these industrial polluters and there has been encouragement from the Wisconsin DNR to engage in the permit process with concerns of permits from sources.</p> <p>Healthy Climate Wisconsin has repeatedly engaged throughout the permitting process and unfortunately we've also learned that there is a intense backlog of regulatory or Title 5 air permits. So many communities across the state are lacking the assurance of the Clean Air Act protections through the permitting process.</p> <p>Which is why we do need to expand the air monitoring network. Also, finally appreciating what is happening at the EPA, we need Wisconsin and our regulators in Wisconsin, to step up and protect us.</p> <p>Appreciating what the lack of funding at the the federal level.</p> <p>So again, I want to thank you for the time to comment and then just reiterate the ask to expand regulatory monitoring in Rock County with a particular matter monitor in an area that will capture more of the sources that do impact the health of the local community. Thank you.</p>	

Comment #	Name of Commentor	Date of Comment	Comment	Response
14	Zoe Rammelkamp	6/10/26	<p>Emailed Comment: Hello, My name is Zoe Rammelkamp, and I am a concerned citizen of the state of Wisconsin. I am also a health professional who has treated patients with various lung diseases, which have been exacerbated by air pollution. I am concerned because of the following: After community science efforts and an IQAir Report found Beloit to be the most polluted regional city in the U.S. in 2023, <u>Wisconsin state regulators need to expand monitoring in the City of Beloit and throughout Rock County.</u> This includes adding one PM2.5 monitor 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. Additionally, Wisconsin's only oil refinery is located in Superior, Douglas County. <u>The EPA advises all counties with oil refineries to have a regulatory PM2.5 monitoring program.</u> Clean air is critical for our community's health. Please protect our state by expanding air monitoring, as I have mentioned above. Best, Zoe Rammelkamp</p>	<p>Please see response to comment #1</p> <p>Additionally: One comment referenced 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 2023 World Air Quality Report.pdf (iqair.com) 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.</p> <p>The methodology in which IQAir calculates the data used in the report lacks any quality assurance or further data review. This greatly contrasts with the strict CAA dictated quality assurance protocols all of DNR's regulatory data undergoes to ensure the highest quality data for use in regulatory decision making.</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>
15	John Meurer	6/10/26	<p>Email comment: Dear Mr Wolf, Wisconsin's current regulatory air monitoring network leaves significant gaps in protecting public health, with ozone and PM2.5 monitors located in only 27 of the state's 72 counties. The DNR should expand monitoring to better capture pollution exposures in communities near major industrial</p>	<p>Please see response to comment #1</p>

Comment #	Name of Commentor	Date of Comment	Comment	Response
			<p>facilities, fossil fuel power plants, transportation corridors, and other significant emission sources, while also addressing underserved rural and small-city areas. Expansion decisions should prioritize environmental justice, climate vulnerability, asthma hospitalization rates, and other public health indicators to ensure monitoring protects the populations at greatest risk.</p> <p>Particular attention should be given to Rock County and Douglas County, where major pollution sources (including the Beloit area and Wisconsin's only oil refinery in Superior) remain inadequately monitored. A stronger statewide monitoring network will provide the data needed to identify harmful pollution exposures, inform public health protections, and ensure that all Wisconsinites, regardless of where they live, have access to clean air and healthier communities.</p> <p>Thanks for your consideration, John Meurer, MD, MBA</p>	
16	Pamela Guthman	6/10/26	<p>Email comment: Hello Erin and Benjamin, I am writing to request that the DNR expand air monitoring efforts in Wisconsin counties because there are large gaps in our regulatory monitoring network that are not obtaining the data that we need. According to the American Lung Association State of the Air Report, the Wisconsin Department of Natural Resources (DNR) only has regulatory ozone and PM2.5 air monitors in 27 of our 72 counties. Unfortunately, communities that are known to have higher density and number of local polluters, and often have large fossil fuel pollution sources, specifically heavy industry and fossil-fuel burning power production are not being monitored. I live in a small, rural community, and all of us including very populated areas deserve regulatory monitoring and protections, too. Please do not limit air monitor placement based on population and population density. The</p>	Please see response to comment #1, #13 and #14

Comment #	Name of Commentor	Date of Comment	Comment	Response
			<p>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.</p> <p>As a public and population health nurse for many years, it is critically important to prioritize public health data into the annual monitoring network review. Priority should be given to counties that have the highest crude asthma hospitalization rates and under-monitored air. It is very important to prioritize areas with greatest pollution that is occurring. 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>Specifically, please expand monitoring to Rock and Douglas County given Beloit, Wisconsin through 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 PM2.5 monitor 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. <i>Rock County's largest emitter, Alliant Energy, has failed to hold a current Title V Air Permit since 2015. With the absence of this operation permit and utilities continued fossil fuel expansions, there is growing concern with regional air quality and safety.</i> And, in Superior, Wisconsin, Wisconsin's only oil refinery is located in Superior, Douglas County. The EPA advises all counties with oil refineries to have a regulatory PM2.5 monitoring program. <i>The absence of a regulatory PM2.5 monitor in Douglas County falls below EPA recommendations.</i></p> <p>Clean air is critical for our community's health. With Wisconsin's continued dependency on the three major</p>	

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			<p>sources of local air pollution: burning fossil fuels for transportation, industry, and energy generation, we must advocate for more comprehensive regulatory air monitoring across the state. All efforts to expand monitoring and prevent air pollution are critical for the health of Wisconsinites for generations to come.</p> <p>I appreciate your consideration and look forward to your response!</p> <p>Appreciatively, Pam Dr. Pamela Guthman</p>	
17	Carri Prom	6/12/26	<p>My name is Carri Prom. I was born and raised in Port Washington, Wisconsin. My family has been here for generations. I am raising three young children here. I am a nurse practitioner, and I am one of the co-founders of Great Lakes Neighbors United, a statewide nonpartisan coalition working on civic engagement, environmental stewardship, and government transparency across Wisconsin.</p> <p>I am submitting this comment in strong support of expanding Wisconsin's regulatory air monitoring network, and I am asking the DNR to treat that expansion as a public health priority.</p> <p>I testified at the April 14, 2026 DNR hearing on air permit 25-MIN-094, which would authorize 45 diesel generators for the proposed Vantage Data Centers Lighthouse Campus in Port Washington. Ozaukee County is already in ozone nonattainment. The air here already exceeds federal health standards on a regular basis, and the DNR's own modeling for that permit contained a factual error that affected the entire emissions impact assessment. Better regulatory monitoring infrastructure makes errors like that harder to make and harder to ignore.</p> <p>As a nurse practitioner, I do not use the word carcinogen lightly. Diesel exhaust is a classified carcinogen. The</p>	<p>Please see response to comment #1, #14</p> <p>Additionally: Questions concerning the technical details of a specific air permit are outside the scope of Wisconsin's ambient air monitoring network and therefore cannot be directly addressed in the annual network plan response to comments.</p> <p>For more information on permitting actions surrounding the Vantage Data Center along with response to public comments, please refer to the department's Air Permit Search Tool.</p> <p>The Air Permit Search Tool allows you to find information on individual air pollution control permits as well as view or download copies of the actual permit and associated documents for businesses in Wisconsin.</p> <p>Instructions on accessing response to comment document: To download the department's response to comments on the draft air permits for the Vantage Data Center project:</p>

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			<p>communities around these permitted facilities deserve regulatory monitoring.</p> <p>I want to address several specific communities where this gap is urgent.</p> <p>Ozaukee County. There are two existing Ozaukee County monitors in Grafton and Harrington Beach Park. Neither are positioned to capture emissions from large industrial development in the Port Washington downtown area. Residents of Port Washington and boat owners at Port Washington's marina have documented and reported on social media visible plumes of orange smoke and orange particulate droplets precipitating onto boats from the We Energies natural gas facility on the lake. We Energies has denied accountability. This is the kind of localized industrial emission event that regional trend monitors are not designed to capture. As large-scale data center development proceeds, with 45 permitted diesel generators and potentially more to come, the DNR should be adding monitoring capacity in proximity to these sources. Relying on monitors positioned for regional trend measurement is not sufficient for a community facing this scale of industrial build-out in a county already failing ozone standards.</p> <p>Beloit, Rock County. We have a GLNU chapter in Beloit/ Rock County, and the community science findings there are serious and have been discredited. After an IQAir analysis identified Beloit as the most polluted regional city in the country in 2023, the DNR's response in this 2027 plan is to cite low-cost sensor comparisons to a monitor in Rockford, Illinois and conclude that concentrations appear "near or below" the NAAQS. I know that you know that this is inadequate. Attempts to explain this away because the air quality monitors aren't regulatory-grade is unacceptable. Rock County's largest emitter, Alliant Energy, has operated without a current Title V Air Permit since 2015. Low-cost sensors compared to out-of-state regulatory monitors are not a</p>	<ul style="list-style-type: none"> • Go to the DNR's Port Washington Data Center Proposal webpage • Scroll to Air Permit Applications and click on "Air permits and related documents" • Click the "Permits and Permit Applications" tab • Click "Select" next to permit number 25-MIN-094 • Click "Select" and then "Dwnld" next to the document named "246185280_25-MIN-094_24618528A-F01_summary_of_changes_and_comments_on_draft.pdf" <p>For any further specific questions on permitting actions for the Vantage Data Center, please contact Ron Binzley at (608)716-9175 or Ronald.Binzley@wisconsin.gov.</p>

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			<p>substitute for regulatory monitoring in a community with this pollution profile. Rock County needs a PM2.5 regulatory monitor placed to capture local pollution, not regional trends.</p> <p>Beaver Dam, Dodge County. Dodge County has an active monitor at Horicon Wildlife Area measuring regional background, not local industrial air quality. Beaver Dam has new industrial pollution sources that are not captured by that placement. I am asking the DNR to evaluate whether current Dodge County monitoring reflects what residents in and around Beaver Dam are actually breathing.</p> <p>Superior, Douglas County. Wisconsin's only oil refinery is in Superior. The EPA advises all counties with oil refineries to maintain a regulatory PM2.5 monitoring program. The absence of one in Douglas County falls below the EPA's own recommendations. Comparing low-cost sensor data to a monitor across state lines in Duluth, Minnesota is not an answer. This city needs its own monitoring.</p> <p>The 2027 plan's disclaimer acknowledges that additional monitoring sites could only be added with additional permanent funding. I understand that is a real constraint, but the network has not meaningfully expanded since 2021. In that same period, Wisconsin has seen significant new industrial development, data center proposals and builds, and continued fossil fuel expansion. The gap between what is being built and what is being monitored is growing. The public comment process exists so the DNR hears what communities need and can make that case to EPA and the legislature. I am telling you what we need.</p> <p>Wisconsin has regulatory monitors in only 27 of 72 counties. The communities bearing the highest industrial pollution burden are not the communities with the most monitoring. That gap is a public health failure and five years without expansion is not a funding constraint, rather it is a policy choice. This comment period is an opportunity to begin changing it.</p>	

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			<p>Thank you so much for taking the time to read this. With the data center, and with it, fossil fuel expansion in full swing, this program needs to be expanded. What was the status quo has quickly become inadequate and we need this gap to be addressed as soon as possible.</p> <p>Carri Prom Co-Founder of Great Lakes Neighbors United Saukville, Wisconsin</p>	
18	Amanda Mueller	6/12/26	<p>Email comment: Dear Mr. Wolf: I'm am writing for not only my concern but the concerns of over a hundred residents located in a subdivision 1/2 mile from the Vantage Data Center. I installed a purple air Zen monitor a few weeks ago. I was astounded by the readings I get just when they start up all their diesel equipment at 5:45am. The dust, silt, fly ash and lime stabilization in the air is significant and will continue through the 10 year build. We don't have the equipment to monitor this. I have no idea how we are expected to live with over 45 generators and from the get go, the ATC lines will not be available to power this data center as it becomes ready. That means generators 24/7 for months/years! Vantage has been given full rein to be self reporting. We are a vulnerable community and we need you to keep vantage accountable and us protected.</p> <p>Thank you. Amanda Mueller</p>	Please see response to comment #1, #17

Comment #	Name of Commentor	Date of Comment	Comment	Response
19	Kim Tydrick	6/12/26	<p>Email comment: Our location already has worse air quality than most due to the shape of the Lake and the conditions it causes, we are in actual danger of our homes becoming unlivable.</p> <p>State agencies are supposed to protect the citizens and the physical environment of our beautiful state, we are begging you to do that!!!</p> <p>So much more information should be studied before any additional approvals are given to this project!!</p> <p>The health and safety of this community and the state depend on standing up to these corporate interests and standing for Wisconsin!!</p> <p>Thank you,</p> <p>Kim Tydrick</p>	Please see response to comment #1, #17
20	Michael Beaster	6/12/26	<p>Email comment: Hello Benjamin, My name is Michael Beaster. I live in Port Washington with my wife and son and was recently elected to the Port Washington common council after strong opposition failed to protect our community from the Vantage data center development currently occurring here.</p> <p>I am submitting this comment in strong support of expanding Wisconsin's regulatory air monitoring network, and I am asking the DNR to treat that expansion as a public health priority. We need an air monitor in Port Washington.</p> <p>I testified at the April 14, 2026 DNR hearing on air permit 25-MIN-094, which would authorize 45 diesel generators for the proposed Vantage Data Centers Lighthouse Campus in Port Washington. Ozaukee County is already in ozone</p>	Please see response to comment #1, #17

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			<p>nonattainment. The air here already exceeds federal health standards on a regular basis, and the DNR's own modeling for that permit contained a factual error that affected the entire emissions impact assessment. Better regulatory monitoring infrastructure makes errors like that harder to make and harder to ignore.</p> <p>We do not have any air monitoring programs to protect our air quality from potential large polluters like this data center, or from the WE Energies natural gas plant already present. Thank you for your consideration. Please help the DNR step up and protect our air quality!</p> <p>Thanks, Michael</p>	
21	Louise Petering	6/8/26	<p>Email comment:</p> <p>The proposal to exclude from calculation of the air quality in SE WI due to wildfire smoke is unwise and unhealthy. Frankly, it smacks of denial of reality. And the proposal puts the "nose under the tent" for further incursions into our air quality regulations. Please include all days in SE Wisconsin air quality measurements and calculations regardless of source; there is no other air for all of us to breathe. WE need to know the facts about the quality of the air we breathe. The more prevalent wildfires become, the less we would know if this measure were to pass. Climate Change is here and getting worse. We need to face the facts.</p> <p>Thank you for this opportunity to comment, Louise Petering</p>	Please see response to comment #1, #13