

The League of Women Voters of Milwaukee County is opposed to permitting Foxconn's emission of pollutants into Wisconsin's air based on our positions in support of an environment beneficial to life and clean air. We are very concerned that the quality of the air in Milwaukee and neighboring counties will be significantly degraded by the Foxconn Campus should air permits allowing emission of pollutants be approved and the Campus begin operations.

Our concern centers on air pollutants Foxconn proposes to emit and their likely environmental and health impacts.

We focus on six air pollutants reported in Foxconn's application: nitrogen oxides, volatile organic chemicals, ozone, particulate matter, greenhouse gases, and carbon monoxide. The tons/year of emitted pollutant are provided in brackets and equal the sum of the tonnage from two of four Plants, the Fabrication Plant and the Energy Plant.

Foxconn will be a major source of **Nitrogen oxides** [207 tons/year] and **volatile organic compounds** [192 tons/year]. Being emitted together at the source site, the two pollutants quite likely will react in the presence of sunlight to the form ground-level ozone. **Ozone** damages lung tissue and results in significant health impacts in children, adults and those working and exercising outdoors. Most counties in Wisconsin experience high ozone days in the summer with two along Lake Michigan averaging 24 and 25 orange alert days per year over the 2013-2016 period.

While Foxconn's application lists some **volatile organic compounds** (VOCs), it does not specifically identify all VOCs it intends to emit. To make a well-informed decision regarding Foxconn's application, the DNR must request the names of all specific VOCs to be emitted, regardless of whether they fall within Clean Air Act and Wisconsin regulations. For the public and health care professionals to understand personal exposures and potential health risks, all VOCs must be reported to public health agencies and made available to Wisconsin residents.

Foxconn is seeking approval to emit **particulate matter** [PM, 47 tons/year; PM 10, 41 tons/year; PM 2.5, 41 tons/year]. These EPA criteria air pollutants would be emitted at levels well above Significant Impact Levels (SIL) defined by the EPA and comprise 15% and 11%, respectively, of currently measured annual background levels. PM 2.5 is implicated in very serious health impacts on children, adults and those working and exercising outdoors.

Foxconn also proposes to emit **greenhouse gases** (GHG). Foxconn estimates it will emit more than **700,000** tons/year of carbon dioxide (CO₂) equivalents, astoundingly 10 times EPA's SIL Limit of 75,000 tons/year. Importantly, its application is unclear as to whether Foxconn's calculation of total GHG includes three significant greenhouse gases **that are 1000 times more potent than CO₂**: carbon tetrachloride [13.2 tons/year] nitrogen fluoride [1.5 tons/year] and sulfur hexafluoride [1.3 tons/year]. Because of their persistence in the atmosphere, these greenhouse gases absolutely need to be included in this calculation, and more importantly, must be prevented from entering the atmosphere.

Though not a greenhouse gas itself, **carbon monoxide** [207 tons/year], indirectly leads to the formation of greenhouse gases under conditions of insufficient atmospheric OH radicals that normally oxidize CO.

According to acmg.seas.harvard.edu/publications/jacobbook/bookchap11.pdf , "In the absence of additional sources OH would be titrated; CO, CH₄, HFCs, and other gases would accumulate to very high levels in the troposphere, with catastrophic environmental implications." We in Wisconsin do not want to experience the catastrophic pollution levels currently experienced in China and India nor increased climate abnormalities and their effects.

Because several pollutants individually exceed the major source thresholds permitted under NR 405.02(22), Foxconn indicates it "anticipates obtaining separate major source Prevention of Significant Deterioration (PSD) permits for the respective sources to be located on the Campus."

The League understands that the New Source Review and PSD do not prevent new sources from emitting such pollutants. Nevertheless, we assert that permitting this project would violate PSD goals.

"PSD is designed to 1. protect public health and welfare; 2. preserve, protect, and enhance the air quality in national parks, national wilderness areas, national monuments, national seashores, and other areas of special national or regional natural, recreational, scenic, or historic value; 3. insure that economic growth will occur in a manner consistent with the preservation of existing clean air resources; and 4. assure ... careful evaluation of all the consequences of such a decision and ... informed public participation in the decision making process."

Exceeding major source thresholds and SIL will not protect public health. Already, the American Lung Association 2017 report on air quality in Wisconsin counties shows Kenosha has a 3-year average of 24 orange ozone day, Milwaukee has ten (10), and counties north range from five (5) orange days in Kewaunee, to 25 in Sheboygan County. Door County averages nine (9). Notably, Racine County is without a report because it lacks air monitoring. Since it lies between Kenosha and Milwaukee Counties, one may reasonably assume its number of orange ozone days would lie between 24 and 10. Notably, air quality of five Wisconsin counties received a Lung Association grade of F. Degradation of air does not protect public health.

Regarding goal 2, the Milwaukee League submits that Kohler Andrae State Park is an area of recreational value that demands denial of a permit to degrade Wisconsin's air. Data from the air monitoring station there have consistently reported among the highest ozone readings in the state. Removing Kohler Andrae air quality data from Wisconsin's calculation of air quality (SB 466) is unrealistic and an invitation to degrade Wisconsin's air quality, its residents' health and the recreational value of Kohler Andrae Park.

Finally, regarding PSD goal 3, we assert that adding pollution from a major source that exceeds thresholds for GHG emissions by a factor of 10 and VOCs, NO_x, CO by a factor of two (2), and 41 tons/year of PM 2.5 - all from the same Campus - will not preserve existing clean air resources. By emitting over 1000 pounds per day each of VOCs, NO_x, and CO along with 200+ pounds of PM 2.5, clean air resources will be degraded in the Village of Mount Pleasant, downwind areas in Racine County, counties along Lake Michigan and those inland areas receiving Easterly winds. Moreover, on relatively

calm days, those working and living near the Campus and longshore areas would undoubtedly experience adverse health effects.

How is the public going to know the quality of the air they breathe? Currently DNR monitors for multiple hazardous air pollutants at two sites only in Wisconsin, the 16th Street Community Health Center in Milwaukee and Horicon Wildlife Area in Dodge & Fond du Lac Counties. In its report for 2018 the DNR does not include plans to install additional monitoring in the Racine area. If the DNR permits Foxconn to emit in The Village of Mount Pleasant, we urge the DNR to require Foxconn to install an air monitoring station downwind of the proposed Campus to analyze and report all pollutant categories and chemicals proposed to be emitted. If the permit is denied - as we strongly urge - we implore the State install, at State expense, an air monitoring station in Racine County.

In the interest of an environment beneficial to life and clean air, the League of Women Voters of Milwaukee County, once again, strongly urges rejection of these Foxconn applications.