



LEAGUE OF WOMEN VOTERS®
WISCONSIN

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The League of Women Voters of Wisconsin holds positions in support of an environment beneficial to life and clean air. We speak this evening in opposition to the Foxconn application for permission to emit several classes of pollutants into the ambient air of our state.

Our concern centers on five air pollutants: nitrogen oxides, volatile organic chemicals, ozone, particulate matter, and greenhouse gases.

Nitrogen oxides and volatile organic compounds (VOCs) are among those pollutants listed by Foxconn as proposed emissions. In the presence of sunlight, the two lead to the formation of ground-level **ozone**. Since ozone damages lung tissue, it results in significant health impacts in children and adults. Most counties in Wisconsin experience high ozone days in the summer. The 8 counties along Lake Michigan currently experience ozone levels that regularly hover around or exceed the National Ambient Air Quality Standards. Foxconn's emission of nitrogen oxides and volatile organic compounds (VOCs) will push these ambient levels of ozone to consistently higher, unhealthy levels.

Foxconn proposes to emit 187 tons of **VOCs** each year yet has not identified all the specific 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. We hope that all those compounds fall within Clean Air Act and Wisconsin regulations. If they do not, the public needs to be notified.

Foxconn is seeking approval to emit 106 tons of **Particulate Matter** (PM 10 + PM 2.5) each year. These EPA criteria air pollutants would be emitted at levels well above Significant Impact Levels 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 and adults.

Foxconn also proposes to emit **greenhouse gases**. Foxconn estimates it will emit more than **700,000** tons of carbon dioxide (CO₂) equivalents per year, nearly 10 times EPA's Significant Impact Limit of 75,000 tons/year. **NOT included in this calculation are 3 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). These are very serious greenhouse gases and absolutely need to be included in this calculation.

How is the public going to know what is in the air they breathe? Currently DNR monitors for multiple hazardous air pollutants at two sites only, the 16th Street Community Health Center in Milwaukee and Horicon Wildlife Area in Dodge County. In its report for 2018 the DNR does not include plans to install additional monitoring in the Racine area. Will the DNR be installing air monitoring equipment in the Racine area to test for the mix of emissions that would come from Foxconn facilities should the permit be approved?

If these applications are approved, emission will be dispersed to near as well as distant areas of our state. Past improvements to Wisconsin's air quality will be undone and health impacts of Wisconsin residents will increase in severity.

In the interest of an environment beneficial to life and clean air, the League of Women Voters of Wisconsin urges rejection of these three applications.