April 14, 2018

FROM: League of Women Voters of Dane County (LWVDC)
TO: Jonathan Wright, Department of Natural Resources, Jonathan.Wright@Wisconsin.gov
RE: Foxconn Campus Air Permits in the Village of Mount Pleasant, Racine County WI

The League of Women Voters of Dane County urges DNR not to issue the air permits to the Foxconn campus (four facilities) to emit tons of a wide variety of hazardous and toxic air pollutants. The Foxconn applications identify campus emissions that will exceed thresholds for major source designation. We are very concerned that if these air permits are approved for Foxconn, the air quality in Racine, Kenosha and Milwaukee counties and neighboring counties will be significantly degraded and result in extensive public health impacts. And, although prevailing Wisconsin wind and water movements suggest that much of the state will not be as severely affected as Milwaukee, Racine and Kenosha counties, nevertheless it is likely that many other parts of the state, including Dane County, will see some adverse impact from the Foxconn campus emissions.

We must also express our concern that the Foxconn application does not identify all the expected air emissions from its facilities. DNR must insist that all possible emissions from the Foxconn campus be identified, not just those regulated by federal and state governments.

Foxconn is seeking approval for facilities on this campus to emit 207 tons/year of nitrogen oxides and 192 tons/year of volatile organic compounds. These two pollutants can react with sunlight to 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. Southeastern WI counties have a history of non-attainment for ozone. Foxconn emissions will certainly undo past improvements in regional air quality and again make the region non-attainment for ozone.

Foxconn is seeking approval to emit 106 tons of particulate matter (PM 10 + PM 2.5) each year. These air pollutants would be emitted at levels well above those defined by EPA criteria as Significant Impact Levels. They would 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 is seeking approval to emit a variety of greenhouse gases (GHGs). As noted in the public hearing testimony of the League of Women Voters of Wisconsin, in its applications, Foxconn lists a total of 700,000 tons of carbon dioxide (CO₂) equivalents per year but fails to include in its calculation tons of three other GHGs that are 1000 times more potent than CO₂.

The Foxconn campus will also emit an estimated 13.9 tons/year of hazardous air pollutants (HAPs). HAPs are pollutants that produce known toxic effects in humans. No information is provided as to the nature of these pollutants, so how is the public to comment on this threat to human health?

Will Foxconn be expected to capture or treat all these chemical gas streams? If water scrubbers are used, the ultimate disposal of the wastewater needs to be evaluated. We would object to the dumping of these pollutants into Lake Michigan by a municipal wastewater treatment plant.

The League of Women Voters of Dane County urges the DNR to carefully evaluate the completeness of the application and verify the total public health and environmental impacts of these air pollutants. LWVDC opposes approval of the Foxconn air permits. Further, LWVDC urges the DNR, if these facilities are permitted, to require Foxconn to install adequate air-monitoring equipment and require regular reporting of emissions to DNR and the public.

Thank you for considering our concerns.