



CHRIS TAYLOR

STATE REPRESENTATIVE ♦ 76th ASSEMBLY DISTRICT

February 22, 2016

Ms. Gail Good, Bureau Director
Bureau of Air Management
Wisconsin Department of Natural Resources
101 S. Webster Street, PO Box 7921
Madison, WI 53703

Dear Ms. Good,

Public Health Madison & Dane County (PHMDC) published an August 11, 2014 memo on the DNR web site entitled, *An Evaluation of the Potential Health Concerns Associated with the Construction of the Goodman Center Splash Pad*.¹ The memo is used by the DNR in its August 26, 2014 neighborhood newsletter to show there is no health concerns related to construction of a splash pad for young children adjacent to the Madison-Kipp aluminum foundry in Madison.²

On Page 3, the PHMDC memo discusses exposure to air pollution in the area around Madison-Kipp. The references for this paragraph include a conversation with Kristin Hart, DNR air permit section chief, and a reference to the DNR modeling web site. In the memo, the Health Department says:

Additional concerns have focused on potential exposure of the Goodman Community Center site to air emissions from the stacks of the Madison-Kipp Corporation (MKC) facility located nearby. As reported by the WI DNR, the MKC site meets ambient air standards as required by the air emission permitting process to control the release of pollutants into the environment. As part of the permitting process, air modeling is used to calculate the potential downwind concentrations of air pollutants released from industrial sources by evaluating several variables including the type of emission, stack parameters, meteorological data, terrain, and the height of surrounding structures to estimate potential exposure. Modeling conducted by the WI DNR does not predict unhealthy concentrations of pollutants originating from potential blow down of emissions from the MKC facility at the Goodman Community Center.

I hope you would agree that a public health department memo should provide accurate information and not mislead residents concerned about air pollution in their neighborhood. I believe the August 11th PHMDC memo is incorrect and misleading. I would like to confirm with you if the PHMDC has misinterpreted DNR staff and guidance.

It appears the PHMDC memo refers to a modeling analysis conducted by the DNR in 2007, nine years ago, to support DNR renewal of air pollution operation permit #113014220-P01 to Madison-Kipp. The modeling results are presented in the DNR preliminary determination for this permit. It concludes that Madison-Kipp complies with the older air quality standards for TSP and PM₁₀.

¹ <http://dnr.wi.gov/topic/Brownfields/documents/kipp/SplashPad0814.pdf>

² <http://dnr.wi.gov/topic/Brownfields/documents/kipp/update082614.pdf>

The 2007 modeling analysis by the DNR did not determine if Madison-Kipp complies with the current and much more protective air quality standards for PM_{2.5}. The 2007 modeling results show that Kipp's maximum 24-hour impact of TSP and PM₁₀ is 75 µg/m³. This is more than double the 24-hour air quality standard for PM_{2.5} without any consideration of existing background air pollution.

Several times my office has either traded correspondence with or met with Air Management staff to encourage the DNR to verify if Madison-Kipp complies with the PM_{2.5} air quality standards. In my June 24, 2014 letter to you, I provided a summary of air monitoring on the bike path near Madison-Kipp and at Lowell Elementary School, and an updated modeling analysis specifically for emissions of PM_{2.5}. Both the monitoring data and updated modeling analysis show Madison-Kipp has never complied with the PM_{2.5} air quality standard. It also showed that PM_{2.5} concentrations at the Goodman Community Center and Lowell Elementary School are currently well above the PM_{2.5} air quality standard.

It appears the PHMDC has been provided information by DNR staff to conclude that Madison-Kipp is complying with air quality standards for PM_{2.5}. If so, I would appreciate if you could provide me with a copy of this information to share with my constituents. However, if the DNR does not know if Madison-Kipp is complying with the air quality standards for PM_{2.5}, I request that DNR staff remove the August 11, 2014 health department memo from its web site and contact PHMDC to correct this misunderstanding.

As we've learned from the recent experience with drinking water in Flint, Michigan, it is important that our public agencies, including the DNR and PHMDC, provide accurate information. This will assure that state legislators can take action to protect our constituents when necessary.

I look forward to your response and working together to make sure the health and safety of my constituents is protected.

Sincerely,

A handwritten signature in black ink that reads "Chris Taylor". The signature is written in a cursive, flowing style.

Representative Chris Taylor
76th Assembly District

Cc: K. Hart - DNR
L. Hanefeld - DNR
J. Hausbeck - Public Health - Madison & Dane Co.
P. Soglin - Mayor of Madison
G. Czerniak - USEPA Region 5
K. Wright - MEA