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PO Box 81792  
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Jan 24<sup>th</sup>, 2018

Mr. Kevin Fletcher  
President  
We Energies  
PO Box 2046  
Milwaukee, WI 53201-2046

Dear Mr. Fletcher,

We Energies has a responsibility to safeguard the health of local residents and act as a good neighbor to the communities in which it operates. Air pollution from particulate emissions, both from combustion of coal and raw coal dust, has long been a concern of neighbors surrounding We Energies' Oak Creek and Elm Road power plants. The health impacts of particulate matter are well-documented by the World Health Organization<sup>1</sup> and include aggravation of asthma and other respiratory issues, cardiovascular problems, and even lung cancer. People with pre-existing lung and heart conditions, the elderly, and children are particularly vulnerable.

This concern is not merely hypothetical or anecdotal. In March of 2016, the presence of coal particulate matter was found in 19 out of 26 homes tested in the area around the Oak Creek power plants<sup>2</sup>. Moreover, We Energies has recently doubled the size<sup>3</sup> of the coal pile on the property, increasing the potential for a coal dust hazard.

In light of these issues, the Clean Power Coalition, representing interested We Energies customers and coal plant neighbors, has been assessing We Energies' efforts to control particulate emissions from the Oak Creek and Elm Road power plants. The coalition recognizes and appreciates that some measures have been taken to reduce coal dust from the on-site pile and that We Energies has committed to measure and publish particulate emissions from a monitor south of the plant. However, after reviewing almost two years of data from this monitor, we remain concerned that We Energies coal plant neighbors are not adequately protected.

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<sup>1</sup> World Health Organization. (2013). *Health Effects of Particulate Matter*. Copenhagen: WHO Regional Office for Europe. Pg. 6. [http://www.euro.who.int/\\_\\_data/assets/pdf\\_file/0006/189051/Health-effects-of-particulate-matter-final-Eng.pdf](http://www.euro.who.int/__data/assets/pdf_file/0006/189051/Health-effects-of-particulate-matter-final-Eng.pdf)

<sup>2</sup> Lockwood, D. (2016, March 18). Coal Dust Found in 19 of 26 We Energies Neighbors' Homes. *Racine County Eye*. <https://www.racinecountye.com/coal-dust-found-in-20-of-26-we-energies-neighbors-homes/>

<sup>3</sup> Schaaf, M. (2015, August 27). Power plant coal pile to double in size. *The Journal Times*. [http://journaltimes.com/news/local/power-plant-coal-pile-to-double-in-size/article\\_17cfb0c4-84db-51dd-a32a-f6bcbdec5bcd.html](http://journaltimes.com/news/local/power-plant-coal-pile-to-double-in-size/article_17cfb0c4-84db-51dd-a32a-f6bcbdec5bcd.html)

1. According to the We Energies Caledonia Ambient Air Quality Monitoring Reports, the wind direction is primarily from the south, yet the only air quality monitoring station currently operated by We Energies is also located south of the coal plants. This means that Oak Creek residents in the neighborhoods north of the plant may be experiencing higher levels of particulate pollution that are not being captured by the monitor. This is particularly concerning due to the recent expansion of the coal pile, which is close to the north side neighborhoods. Please see table 1, below:

**Table 1**

**Primary Wind Direction  
We Energies New Caledonia Station Data**  
(percent of days recorded)

Wind From	2016	2017	Combined	Impacted
North	4%	4%	4%	South
East	14%	19%	16%	West
South	48%	44%	47%	North
West	33%	33%	33%	East

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Data for 2016 from Jan 14 to Dec 31, 2016

Data for 2017 from Jan 1 to Nov 30, 2017

***Based on this information, we request that We Energies add an air monitor north of the plant.*** This monitor should be placed in or near the neighborhoods closest to the plant (Elm Road and Barton Road area).

Additionally, the coalition is concerned that We Energies' Caledonia air monitor is not placed in the correct location to accurately measure particulate pollution affecting neighborhoods south of the plant. Currently, the monitoring station is located west of the coal trains, which are a fugitive dust hazard. However, We Energies' wind direction data indicate that wind often comes from the west (approximately twice as often as it comes from the east), pushing fugitive dust away from the monitor and towards Michna Road and the Crestview neighborhood. ***Thus, we request that We Energies move their Caledonia monitor to the east side of the railroad tracks to more accurately capture particulate hazards from coal trains to the surrounding neighborhoods.***

2. For the first two years the air monitor ran, it measured fine particulate pollution on several days very near the EPA Clean Air Act daily limit<sup>4</sup>. Fine particulate pollution, also known as PM 2.5, is considered by the World Health Organization to be particularly dangerous to human health. Given how close the levels have been to the EPA's limit in

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<sup>4</sup> There has been a reported daily value very near the EPA Clean Air Act daily limit of 35 micrograms/m<sup>3</sup> EPA daily limit for PM 2.5 (particles 2.5 microns or less) each of the first two years (33 in 2016 and 34 in 2017).

the past, it's likely that at some point pollution levels on a given day will exceed that limit. Under EPA guidelines, when this happens, residents are supposed to be provided with an Air Quality Index Alert. This brings us to a few additional questions and requests:

First, does We Energies provide their data for use within the State of Wisconsin PM 2.5 Monitoring and Reporting Network? ***If not, we request that We Energies begin reporting this data to the network to so that they can issue alerts if exceedances occur.***

Second, data from We Energies' Caledonia air monitor is currently posted for the public on a monthly basis within one week of the end of each month. While we appreciate the transparency, We Energies can best protect its neighbors from air pollution issues by posting real-time information. ***Thus, we request that that We Energies post data from its current air monitor and any future additional air monitors in real time, or, if not technically feasible, as quickly as possible.***

The coalition is encouraged by We Energies' decision to retire the nearby Pleasant Prairie plant in favor of clean, renewable solar energy, and views it as a sign that We Energies is increasingly aware of the dangers of coal to human health. We hope We Energies carefully considers our requests to safeguard the health of local residents and act as a good neighbor to the community, and look forward to hearing your timely response.

Sincerely,



Steve Slavens, Data Committee Chair, on behalf of the Clean Power Coalition – Southeast Wisconsin

CC Gale Klappa, Mike Peters, Jeff Keebler

*The Clean Power Coalition – Southeast Wisconsin is comprised of the following convening member organizations:*

*Eco Justice Center  
Environmental Accountability Group  
Greening Greater Racine  
Racine Dominicans  
Racine Green Party  
Sierra Club, Beyond Coal Campaign  
Sierra Club, Southeast Gateway Group  
Wisconsin Interfaith Power and Light  
350 Milwaukee*