

**Memorandum of Agreement
Air Quality Monitoring for Criteria Pollutants for the
Minneapolis-St. Paul-Bloomington, MN-WI;
Duluth, MN-WI; and
La Crosse-Onalaska, WI-MN
Metropolitan Statistical Areas (MSA)**

Date: May 2025

Participating Agencies:

Minnesota Pollution Control Agency (MPCA)
Environmental Analysis and Outcomes Division

Wisconsin Department of Natural Resources (WDNR)
Air Management Program

I. Purpose, Objectives and Goals

40 CFR Part 58 Appendix D Section 2 paragraph (e) states “[t]he [United States Environmental Protection Agency (EPA)] recognizes that State or local agencies must consider MSA/CSA boundaries and their own political boundaries and geographical characteristics in designing their air monitoring networks. The EPA recognizes that there may be situations where the EPA Regional Administrator and the affected State or local agencies may need to augment or to divide the overall MSA/CSA monitoring responsibilities and requirements among these various agencies to achieve an effective network design. Full monitoring requirements apply separately to each affected State or local agency in the absence of an agreement between the affected agencies and the EPA Regional Administrator.”

The purpose of this Memorandum of Agreement (MOA) is to establish a Criteria Pollutants Air Quality Monitoring Agreement between MPCA and WDNR (individually a “Party” and together, the “Parties”) for three Metropolitan Statistical Areas (the MSAs) (Minneapolis-St. Paul-Bloomington MN-WI; Duluth MN-WI; and La Crosse-Onalaska WI-MN) with populations greater than 50,000 that cross State boundaries between Minnesota and Wisconsin so the Parties may collectively achieve the EPA’s minimum monitoring requirements for the following criteria pollutants:

- Particles of an aerodynamic diameter of 10 micrometer and less (PM₁₀)
- Particles of an aerodynamic diameter of 2.5 micrometer and less (PM_{2.5})
- Ozone (O₃)
- Nitrogen Dioxide (NO₂)
- Sulfur Dioxide (SO₂)
- Carbon Monoxide (CO)

- Lead (Pb)

a. Minneapolis-St. Paul-Bloomington MN-WI MSA

According to U.S. Census data, the Minneapolis-St. Paul-Bloomington MN-WI MSA had an estimated population of 3,757,952 in 2024. The MSA consists of 14 counties in Minnesota (Anoka, Carver, Chisago, Dakota, Hennepin, Isanti, Le Sueur, Mille Lacs, Ramsey, Scott, Sherburne, Sibley, Washington, Wright) and two counties in Wisconsin (Pierce, St. Croix). In 2011, MPCA and WDNR established an air monitoring MOA that included only the Minneapolis-St. Paul-Bloomington MN-WI MSA. This updated MOA will replace the 2011 MOA for the Minneapolis-St. Paul-Bloomington MN-WI MSA.

The minimum monitoring requirements according to 40 CFR Part 58, Appendix D for the estimated population of the Minneapolis-St. Paul-Bloomington MN-WI MSA are provided below along with the current number of monitors as of 2024.

Parameter	Monitors Required	2024 Monitors
PM _{2.5}	2	19
PM ₁₀	4-8	8
Ozone	2	7
Sulfur Dioxide	1	6
Carbon Monoxide	1 Near-Road, 1 NCore	2 Near-Road, 1 NCore, 3 others
Nitrogen Dioxide	2 Near-Road, 1 Area-Wide	2 Near-Road, 3 Area-Wide
Lead	Determined by annual emissions	20

To meet the minimum monitoring requirements for the Minneapolis-St. Paul-Bloomington MN-WI MSA, the following sites will collect the required parameters during the 2025-2029 monitoring years:

County	AQS ID	Site name	**PM _{2.5}	**PM ₁₀	Ozone	Sulfur Dioxide	Carbon Monoxide	Nitrogen Dioxide	*Lead/TSP
Anoka	27-003-1001	Cedar Creek			X				
Anoka	27-003-1002	Anoka County Airport	FCS	C	X	X	X	X	X
Anoka	27-003-6021	Federal Cartridge							Xx
Dakota	27-037-0020	Flint Hills Refinery 420				X	X	X	Xx
Dakota	27-037-0423	Flint Hills Refinery 423				X	X	X	X
Dakota	27-037-0443	Flint Hills Refinery 443				X			
Dakota	27-037-0465	Gopher Resources							Xxx

Dakota	27-037-0470	Apple Valley	Cc						
Dakota	27-037-0480	Near Road I-35	C				X	X	
Hennepin	27-053-0909	Lowry Avenue		C					X
Hennepin	27-053-0910	Pacific Street		C					X
Hennepin	27-053-0954	Hennepin Center for the Arts				X	X		
Hennepin	27-053-0962	Near Road I-35/I-94	C		X		X	X	X
Hennepin	27-053-0963	Anderson School	FCS						X
Hennepin	27-053-0966	City of Lakes Building		F					X
Hennepin	27-053-1007	Humbolt Avenue							X
Hennepin	27-053-1904	Greenway Neighborhood	C						X
Hennepin	27-053-1909	Bottineau/Marshall Ter		C					X
Hennepin	27-053-2006	St. Louis Park City Hall	Ff						
Ramsey	27-123-0866	Red Rock Road		Ff					
Ramsey	27-123-0868	Ramsey Health Center	F	C					
Ramsey	27-123-0871	Harding High School	FfC						X
Ramsey	27-123-0875	West Side							X
Ramsey	27-123-0890	Northern Iron							X
Scott	27-139-0505	B.F. Pearson School	C		X				
Washington	27-163-0436	St. Paul Park Refinery 436				X			
Washington	27-163-6016	St. Croix Research Station			X				
Wright	27-171-3201	St. Michael Elem. School	C		X				
Forest	27-095-3051	Mille Lacs Band			X				

X=representative of a single monitor

**C = PM_{2.5} Continuous monitor

**c = Collocated PM_{2.5} Continuous monitor

**F = PM_{2.5} FRM monitor

**f = Collocated PM_{2.5} FRM monitor

**S = PM_{2.5} Speciation

*x= Collocated lead/TSP monitor

b. Duluth MN-WI MSA

According to U.S. Census data, the Duluth MN-WI MSA had an estimated population of 281,815 in 2024. The MSA consists of 2 counties in Minnesota (Carlton, St. Louis) and 1 county in Wisconsin (Douglas).

The minimum monitoring requirements according to 40 CFR Part 58, Appendix D for the estimated population of the Duluth MN-WI MSA are provided below along with the current number of monitors as of 2024.

Parameter	Monitors Required	2024 monitors
PM _{2.5}	0	5
PM ₁₀	1-2	3
Ozone	1	3
Sulfur Dioxide	0	1
Carbon Monoxide	0	0
Nitrogen Dioxide	0	1
Lead	Determined by annual emissions	4

To meet the minimum monitoring requirements for the Duluth MN-WI MSA, the following sites will collect the required parameters during the 2025-2029 monitoring years:

County	AQS ID	Site name	**PM _{2.5}	**PM ₁₀	Ozone	Sulfur Dioxide	Carbon Monoxide	Nitrogen Dioxide	Lead/TSP
Saint Louis	27-137-0032	Oneota Street		Ff					
Saint Louis	27-137-7001	Virginia City Hall	C	F		X		X	X
Saint Louis	27-137-7549	Michigan Street							X
Saint Louis	27-137-7550	U of M-Duluth	C		X				
Saint Louis	27-137-7555	Waseca Road							Xx
Saint Louis	27-137-7554	Laura McArthur School	C						
Carlton	27-017-7417	Fond du Lac Band	C		X				
Saint Louis	27-137-0034	Voyageurs NP-Sullivan Bay	S		X				

X=representative of a single monitor

- **C = PM_{2.5} Continuous monitor
- **c = Collocated PM_{2.5} Continuous monitor
- **F = PM_{2.5} FRM monitor
- **f = Collocated PM_{2.5} FRM monitor
- **S = PM_{2.5} Speciation
- *x= Collocated lead/TSP

c. LaCrosse-Onalaska WI-MN MSA

According to U.S. Census data, the LaCrosse-Onalaska WI-MN MSA had an estimated population of 170,763 in 2024. The MSA consists of 1 county in Minnesota (Houston) and 1 county in Wisconsin (La Crosse).

The minimum monitoring requirements according to 40 CFR Part 58, Appendix D for the estimated population of the LaCrosse-Onalaska WI-MN MSA are provided below along with the current number of monitors as of 2024.

Parameter	Monitors Required	2024 Monitors
-----------	-------------------	---------------

PM _{2.5}	0	0
PM ₁₀	0	0
Ozone	1	1
Sulfur Dioxide	0	0
Carbon Monoxide	0	0
Nitrogen Dioxide	0	0
Lead	Determined by annual emissions	0

To meet the minimum monitoring requirements for the La Crosse WI-MN MSA, the following sites will collect the required parameters during the 2025-2029 monitoring years:

County	AQS ID	Site name	**PM _{2.5}	**PM ₁₀	Ozone	Sulfur Dioxide	Carbon Monoxide	Nitrogen Dioxide	*Lead/TSP
La Crosse	55-063-0012	La Crosse DOT			X				

X=representative of a single monitor

**C = PM_{2.5} Continuous monitor

**c = Collocated PM_{2.5} Continuous monitor

**F = PM_{2.5} FRM monitor

**f = Collocated PM_{2.5} FRM monitor

**S = PM_{2.5} Speciation

*x= Collocated lead/TSP

II. Responsibilities/Actions

The Parties commit to conducting appropriate monitoring in their respective jurisdictions of the MSAs. Each Party is responsible for ensuring that its obligations under the MOA are met. As conditions warrant, the Parties may communicate to discuss monitoring activities for the MSAs. Each Party shall notify the other Party of any monitoring changes occurring within its jurisdiction in any of the MSAs as soon as practicable after learning of the need for the change(s) or prior to making the change(s). Such changes may include evictions of monitoring sites, destruction of monitoring sites due to natural disasters, or any occurrences that result in an extended (greater than a quarter) or permanent change to the monitoring network.

III. Limitations

- All commitments made in the MOA are subject to the availability of appropriated funds and each Party's budget priorities. Nothing in the MOA obligates the Parties to expend appropriations or enter any contract, assistance agreement, interagency agreement, or other financial obligation.
- The MOA is neither a fiscal nor a funds obligation document. Any endeavor involving reimbursement or contribution of funds between the Parties will be subject to separate agreements that will be affected in writing by representatives of the Parties.

- This MOA does not create any right or benefit enforceable by law or equity against the Parties, their officers or employees, or any other person. This MOA does not apply to any entity outside of the MPCA or the WDNR.
- No proprietary information or intellectual property is anticipated to arise out of this MOA.

IV. Points of Contact

The following individuals may be contacted with questions regarding this Agreement.

Ben Wolf, Air Monitoring Section Manager
Air Management-Department of Natural Resources
Phone: (414) 216-1082
Benjamin.wolf@wisconsin.gov

Kurt Anderson, Air Monitoring Unit Supervisor
Environmental Analysis and Outcomes Division-Minnesota Pollution Control Agency
Phone: (651) 757-2192; (952) 221-3910
Kurt.anderson@state.mn.us

V. Termination

This MOA will be effective when signed by all Parties (the “effective date”). This MOA may be amended at any time by the mutual written consent of both Parties. The Parties agree to review this MOA every 5 years from the effective date to determine whether the MOA should be revised, renewed, or terminated. Each Party reserves the right to terminate this MOA at any time for any reason by giving a thirty (30) days written notice prior to the date of termination.

Approvals

Minnesota Pollution Control Agency

Signed by:
By: Sandeep R. Burman 5/5/2025 | 8:03 AM CDT
98BC3DEC5FF94B4...

Sandeep R. Burman, PG
Director, Environmental Analysis & Outcomes Division
Minnesota Pollution Control Agency

Wisconsin Department of Natural Resources

Signed by:
By: Gail E. Good 5/2/2025 | 8:33 AM CDT
9AA91D46A40C4A3...

Gail E. Good
Director, Air Management Program
Department of Natural Resources