



**WISCONSIN STATE LEGISLATURE ...
PUBLIC HEARING - COMMITTEE RECORDS**

2011-12

(session year)

Assembly

(Assembly, Senate or Joint)

Committee on Natural Resources...

COMMITTEE NOTICES ...

- Committee Reports ... **CR**
- Executive Sessions ... **ES**
- Public Hearings ... **PH**

INFORMATION COLLECTED BY COMMITTEE FOR AND AGAINST PROPOSAL

- Appointments ... **Appt** (w/Record of Comm. Proceedings)
- Clearinghouse Rules ... **CRule** (w/Record of Comm. Proceedings)
- Hearing Records ... bills and resolutions (w/Record of Comm. Proceedings)
(**ab** = Assembly Bill) (**ar** = Assembly Resolution) (**ajr** = Assembly Joint Resolution)
(**sb** = Senate Bill) (**sr** = Senate Resolution) (**sjr** = Senate Joint Resolution)
- Miscellaneous ... **Misc**

Present: (16) Representatives Mursau, Rivard, Williams, Kleefisch, Nerison, Severson, Steineke, Tiffany, Stroebel, Litjens, Mason, Molepske Jr, Danou, Clark, Milroy and Hulsey.

Absent: (0) None.

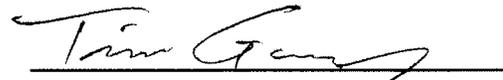
Excused: (0) None.

Moved by Representative Rivard, seconded by Representative Nerison that **Clearinghouse Rule 11-005** be recommended for review period waived.

Ayes: (16) Representatives Mursau, Rivard, Williams, Kleefisch, Nerison, Severson, Steineke, Tiffany, Stroebel, Litjens, Mason, Molepske Jr, Danou, Clark, Milroy and Hulsey.

Noes: (0) None.

REVIEW PERIOD WAIVED RECOMMENDED, Ayes 16, Noes 0



Tim Gary
Committee Clerk





**Testimony of Joseph Hoch, DNR Regional Pollutants Section Chief,
Air Management Program,
Before the Committee on Natural Resources
Regarding Clearinghouse Rule 11-005
(Reasonably Available Control Technology Emission Limitations for Volatile Organic Compounds)**

September 14, 2011

Good Morning, I am Joseph Hoch, Chief of the Regional Pollutant Section in the Bureau of Air Management at the Department of Natural Resources. I am here today to testify on Clearinghouse Rule 11-005.

The federal Clean Air Act requires the U.S. Environmental Protection Agency (EPA) to set National Ambient Air Quality Standards for six air pollutants, also known as criteria pollutants. Ground-level ozone is one of the six criteria pollutants. It is not emitted directly into the air, but is created by a chemical reaction between oxides of nitrogen, referred to as NOx, and volatile organic compounds, referred to as VOC, in the presence of sunlight.

Areas not meeting the federal air quality standards are designated by the U.S. EPA as non-attainment areas. Currently, seven counties in Southeast Wisconsin are designated non-attainment for the 1997 8-hour ozone standard of 84 parts per billion. Such areas are required to adopt a variety of NOx and VOC control measures. One such control measure is reasonably available control technology, referred to as RACT, for both NOx and VOC.

The VOC RACT rules recently adopted by the Wisconsin Natural Resources Board on August 10, 2011 were primarily modifications of existing rules. Modifications were necessary because the U.S. EPA identified deficiencies with some of our prior rules. The primary impacted stakeholders from these rule revisions are the printing and coating industry. During this latest rule drafting process, the Department worked closely with both the EPA and potentially affected stakeholders to virtually assure approvability. The rule revisions generally represent more stringent control of VOC emissions in Southeast Wisconsin.

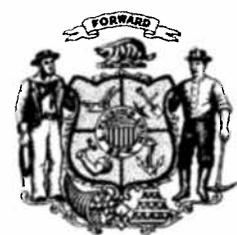
The VOC RACT rule revisions are necessary for three reasons:

1. Approved VOC RACT rules are required by the Clean Air Act to be included in our State Implementation Plan to address ozone non-attainment areas.
2. The Department requested all of Southeast Wisconsin be redesignated to an attainment area for the 1997 8-hour ozone standard in September, 2009. The U.S. EPA can not act on this request until our VOC RACT rules are fully approved.
3. The President recently decided the U.S. EPA would not revise the current ozone standard, which is the 2008 8-hour ozone standard of 75 parts per billion until at least 2013. It is beneficial for the state to avoid potential overlaps in non-attainment between the 1997 ozone standard and the 2008 ozone standard because when this happens the more stringent requirements apply. This is done in order to prevent backsliding of air quality improvements.

Thank you for the opportunity to provide the committee with information on these rule revisions. I would be happy to answer questions you may have at this time.



WISCONSIN STATE LEGISLATURE



Report From Agency

REPORT TO LEGISLATURE

NR 400, 419, 421, 422, 423, 439, and 484, Wis. Adm. Code,
Corrections of deficiencies identified by the U.S. Environmental Protection Agency with a portion of the
state's current volatile organic compound reasonably available control technology rules.

Board Order Number: AM-44-10
Clearinghouse Rule Number: 11-005

This rule is not subject s. 227.185, Wis. Stats. The statement of scope for this rule, published in Register 657 on September 14, 2010, was sent to the Legislative Reference Bureau prior to the effective date of 2011 Wisconsin Act 21.

Under s. 285.14 (2), Stats., rules that affect the state implementation plan must be submitted to standing committees of the legislature with jurisdiction over environmental matters at least 60 days before the rule may be submitted to the U.S. Environmental Protection Agency. It is the Department's intent to submit these proposed rules to the U.S. Environmental Protection Agency as a revision to the state implementation plan.

BASIS AND PURPOSE OF THE PROPOSED RULE

Section 182 (b) (2) of the federal Clean Air Act [42 USC 7511a (b) (2)] requires implementation of reasonably available control technology (RACT) for volatile organic compound (VOC) emission source categories in moderate or worse ozone nonattainment areas and for which the U.S. EPA has published control techniques guidelines (CTGs).

Federally approved VOC RACT rules are required for Wisconsin's ozone state implementation plan (SIP) and are a prerequisite for redesignation of the state's remaining nonattainment areas for the 1997 8-hour ozone national ambient air quality standards (NAAQS). The counties of Kenosha, Milwaukee, Ozaukee, Racine, Sheboygan, Washington, and Waukesha constitute the current ozone nonattainment areas. In addition to a delay in the redesignation of these counties, an incomplete SIP could result in federal sanctions, including withholding of federal highway funds and the potential implementation of a federal air management plan.

In March 17, 2008 the Department received notification from the U.S. EPA that the Department's VOC RACT rules were not consistent with certain CTGs and therefore were deficient. The Department therefore proposed, and the Natural Resources Board adopted rules on March 25, 2009 with the intent of correcting the deficiencies. These rules were contained in Clearinghouse Rules 08-102, 08-104, and 08-114, all of which became effective on August 1, 2009, and were submitted to the U.S. EPA as a revision to the SIP. On April 22, 2010, the U.S. EPA notified the Department that the submittal did not adequately address all deficiencies, and additional corrections were necessary to make the state's VOC RACT rules approvable.

In order to avoid the potential for federal sanctions and ensure timely redesignation of the state's remaining ozone nonattainment areas for the 1997 8-hour NAAQS, the Department is proposing rule revisions to address these remaining deficiencies.

SUMMARY OF PUBLIC COMMENTS AND AGENCY RESPONSE

The Department held one hearing on the proposed rules on March 14, 2011 in Madison. Five people attended the hearing. Four people registered as interest may appear, and one person did not indicate a position. No oral comments were presented at the hearing.

The Department received written comments from the following: American Coating Association, the Can Manufacturers Institute, Specialty Graphic Imaging Association, Bemis Company, Inc., Printing Industries of Wisconsin, and the U.S. Environmental Protection Agency.

The comments, and the Department's responses, are included in Appendix A.

MODIFICATIONS MADE TO THE PROPOSED RULE AS A RESULT OF PUBLIC COMMENT OR TESTIMONY RECEIVED

Modifications made to the proposed rules resulting from public comments are provided in Appendix A.

PERSONS APPEARING OR REGISTERING AT PUBLIC HEARING

In support:	None
In opposition:	None
As interest may appear:	Troy Stucke, 444 Highland Drive, Kohler, WI 53044 Mike Cassidy, 444 Highland Drive, Kohler, WI 53044, representing Kohler Company Rob Harman, 109 Cumings Lane, Neenah, WI 54956, representing Bemis Company Howard Hofmeister, 929 Wylde Oak Drive, Oshkosh, WI 54904, representing Bemis Company
No position indicated:	Jeffrey Bence, 10800 S 13th Street, Oak Creek, WI 53154, representing PPG Industries

None of the above indicated they were representing the interests of a small business, as defined in s. 227.114, Wis. Stats.

CHANGES TO RULE ANALYSIS AND FISCAL ESTIMATE

No substantive changes were made to the rule analysis and no changes were made to the fiscal estimate.

RESPONSE TO LEGISLATIVE COUNCIL RULES CLEARINGHOUSE REPORT

The Legislative Council Rules Clearinghouse report contained 35 comments concerning Form, Style and Placement in Administrative Code; Adequacy of References to Related Statutes, Rules and Forms; and Clarity, Grammar, Punctuation, and Use of Plain Language. The Department accepted and addressed all but eight comments which are identified in the Clearinghouse Report as comments 2.h., 2.i., 2.j., 5.b., 5.f., 5.g., 5.j., and 5.k. These eight comments and the Department's reason for not making a change follow:

Comment 2.h. The rule makes extensive use of the passive voice, many instances of which are easily avoided. For example, in s. NR 419.045 (4) (d) (intro.), "The following records shall be retained..."

should be written as "The owner or operator of a waste management unit shall maintain the following records...". Section NR 419.045 (9) provides a good model for the use of active voice. [Note that s. NR 419.045 (4) (intro.) correctly uses the active voice, but makes it more cumbersome than necessary; the phrase "that is subject to requirements under sub. (2) or (3)" is duplicative of the applicability statement in s. NR 419.045 (1). By the same reasoning, in s. NR 419.045 (7) (intro.), it appears that "a facility subject to this section" could be replaced with "a waste management unit".]. The entire rule should be reviewed for the use of active versus passive voice.

Response. In many instances the Department used language recommended by the U.S. EPA to ensure rule SIP approvability; therefore, changes were not made in response to this comment.

Comment 2.i. The effective dates in s. NR 421.05 (1) (a) and (b) (intro.) are long past. Are they of any continuing pertinence? If not, this rule is an opportunity to repeal them. The same applies to subsequent, parallel provisions.

Response. The Department believes it is appropriate to retain the dates mentioned for historical reference related to rule implementation issues such as compliance and enforcement.

Comment 2.j. It appears that the facilities identified in s. NR 421.05 (1) (c) are a subset of the facilities identified in s. NR 421.05 (1) (a). If this is correct, are the requirements imposed under par. (c) in addition to the requirements imposed under par. (a), or in place of them? If it is the former, this could be clarified by inserting at the beginning of par. (c): "In addition to the requirements under par. (a)."; if it is the latter, this could be clarified by inserting at the beginning of par. (a): "Except as provided in par. (c).". The same applies to subsequent parallel provisions.

Response. The phrase in s. NR 421.05 (1) (c), "as described in par. (a)", and in subsequent parallel provisions, is only intended to refer to the operations described in par. (a). Note that the affected counties are different, as is the emission threshold and the emissions to be considered. The Department believes that this intent will be understood and that a change is not necessary.

Comment 5.b. The definition of "wipe cleaning," in s. NR 421.02 (23), does not seem necessary. In addition to its meaning being quite obvious, the term is used only twice in the rule, apart from the definition. Is there any possibility of the term being misconstrued?

Response: The term "wipe cleaning" is defined in s. NR 423.02(12) to be specific to cleaning of metal products or product components. While that definition does not apply in ch. NR 421, the Department believes the definition here will reinforce the broader meaning intended here.

Comment 5.f. In s. NR 422.05 (1m) (a) to (h), it might be helpful to group together the exemptions that pertain to all of sub. (3) [currently in par. (a), (b), and (h)], followed by those applicable just to certain paragraphs of sub. (3). Note that this suggested grouping is done in s. NR 422.145 (1m).

Response: Changes made in response to EPA comments left only one reference to all of sub. (3), rendering this comment moot.

Comment 5.g. In s. NR 422.05 (1m) (c), should "performance laboratory tests" be "performing laboratory tests"? The same applies to subsequent parallel provisions.

Response: This comment now relates to s. NR 422.05 (1m) (d) due to the response to Clearinghouse comment 5.f. No change was made because "performance" refers to a type of testing, i.e., the ability of the ink or coating to meet established performance standards.

Comment 5.j. Should s. NR 422.144 (2) (intro.) state that the specified retention factors and capture efficiencies shall be used? If a person chooses not to use them, what is the alternative?

Response: The Department does not believe the suggested change is necessary. Use of the word "may" is consistent with the fact that the values provided are accepted by the U.S. EPA and the Department without supporting testing or other demonstrations. Another option would be for a person to propose an alternative, in which case the Department could require testing, etc., to serve as a basis for a decision on whether to approve the request for the alternative. In addition, the Department uses "may" in parallel language in ss. NR 422.142 (1m) and 422.143 (1m).

Comment 5.k. The wording of s. NR 423.037 (2) (a) 4. k. and subsequent, parallel provisions is awkward. Would it be correct to revise the inserted language to say "excluding use of industrial adhesives and adhesive primers"?

Response: The language that is the subject of this comment was removed in response to comments from the U.S. EPA, rendering this comment moot.

FINAL REGULATORY FLEXIBILITY ANALYSIS

The Department does not believe that the proposed rule revisions will have a significant economic impact for individual small businesses.

For industrial solvent cleaning operations, the applicability threshold for the proposed rules is 3 tons actual emission from a facility, on a 12 consecutive month rolling basis, with any control equipment inoperative. The Department believes that this threshold will not affect the majority of small businesses.

Due to the nature and complexity of the industrial wastewater operations, and synthetic organic chemical manufacturing industry categories, it is highly unlikely that a small business, as defined in s. 227.114(1), Wis. Stats., would have an operation that triggers the emission reduction requirements for these source categories in the proposed rules.



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

Richard Sweet
Clearinghouse Director

Terry C. Anderson
Legislative Council Director

Pam Shannon
Clearinghouse Assistant Director

Laura D. Rose
Legislative Council Deputy Director

CLEARINGHOUSE REPORT TO AGENCY

[THIS REPORT HAS BEEN PREPARED PURSUANT TO S. 227.15, STATS. THIS IS A REPORT ON A RULE AS ORIGINALLY PROPOSED BY THE AGENCY; THE REPORT MAY NOT REFLECT THE FINAL CONTENT OF THE RULE IN FINAL DRAFT FORM AS IT WILL BE SUBMITTED TO THE LEGISLATURE. THIS REPORT CONSTITUTES A REVIEW OF, BUT NOT APPROVAL OR DISAPPROVAL OF, THE SUBSTANTIVE CONTENT AND TECHNICAL ACCURACY OF THE RULE.]

CLEARINGHOUSE RULE **11-005**

AN ORDER to .., relating to the revision of the state's reasonably available control technology emission limitations for volatile organic compound to address deficiencies identified by the U.S. Environmental Protection Agency, and affecting small business.

Submitted by **DEPARTMENT OF NATURAL RESOURCES**

02-04-2011 RECEIVED BY LEGISLATIVE COUNCIL.

03-02-2011 REPORT SENT TO AGENCY.

PS:DLL

LEGISLATIVE COUNCIL RULES CLEARINGHOUSE REPORT

This rule has been reviewed by the Rules Clearinghouse. Based on that review, comments are reported as noted below:

1. STATUTORY AUTHORITY [s. 227.15 (2) (a)]
Comment Attached YES NO
2. FORM, STYLE AND PLACEMENT IN ADMINISTRATIVE CODE [s. 227.15 (2) (c)]
Comment Attached YES NO
3. CONFLICT WITH OR DUPLICATION OF EXISTING RULES [s. 227.15 (2) (d)]
Comment Attached YES NO
4. ADEQUACY OF REFERENCES TO RELATED STATUTES, RULES AND FORMS [s. 227.15 (2) (e)]
Comment Attached YES NO
5. CLARITY, GRAMMAR, PUNCTUATION AND USE OF PLAIN LANGUAGE [s. 227.15 (2) (f)]
Comment Attached YES NO
6. POTENTIAL CONFLICTS WITH, AND COMPARABILITY TO, RELATED FEDERAL REGULATIONS [s. 227.15 (2) (g)]
Comment Attached YES NO
7. COMPLIANCE WITH PERMIT ACTION DEADLINE REQUIREMENTS [s. 227.15 (2) (h)]
Comment Attached YES NO



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CLEARINGHOUSE RULE 11-005

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Reference Bureau and the Legislative Council Staff, dated September 2008.]

2. Form, Style and Placement in Administrative Code

- a. In the second sentence of s. NR 419.02 (8e), the term “individual drain system” should be shown in quotation marks.
- b. In s. NR 419.02 (15t), “organics” is not a defined term. Is it the same as either “volatile organic compounds” or “organic compounds”, both of which are defined? If so, the appropriate term should be used.
- c. Presumably, in the definition of “temperature monitoring device” [in s. NR 419.02 (15p)], the phrase “whichever number has the highest absolute value” applies to pars. (a) and (b). In that case, it belongs in the introduction, which could be worded something like the following: “...having a minimum accuracy of whichever of the following has [or “produces”] the highest absolute value:”.
- d. Section NR 419.045 (3) (intro.) should end with a colon.
- e. In s. NR 419.045 (3) (a) 1., the phrase “to qualify for the control option available under this paragraph” could be deleted.
- f. In s. NR 419.045 (4) (a) 1., “correction” should be changed to “corrective”.
- g. Section NR 419.045 (4) (a) 2. a. is not in the same format as the following subdivision paragraphs. It could be reworded as follows: “An access door or other opening is left open when not in use”. The same applies to subsequent, parallel provisions.

h. The rule makes extensive use of the passive voice, many instances of which are easily avoided. For example, in s. NR 419.045 (4) (d) (intro.), "The following records shall be retained..." should be written as "The owner or operator of a waste management unit shall maintain the following records...". Section NR 419.045 (9) provides a good model for the use of active voice. [Note that s. NR 419.045 (4) (intro.) correctly uses the active voice, but makes it more cumbersome than necessary; the phrase "that is subject to requirements under sub. (2) or (3)" is duplicative of the applicability statement in s. NR 419.045 (1). By the same reasoning, in s. NR 419.045 (7) (intro.), it appears that "a facility subject to this section" could be replaced with "a waste management unit"]. The entire rule should be reviewed for the use of active versus passive voice.

i. The effective dates in s. NR 421.05 (1) (a) and (b) (intro.) are long past. Are they of any continuing pertinence? If not, this rule is an opportunity to repeal them. The same applies to subsequent, parallel provisions.

j. It appears that the facilities identified in s. NR 421.05 (1) (c) are a subset of the facilities identified in s. NR 421.05 (1) (a). If this is correct, are the requirements imposed under par. (c) in addition to the requirements imposed under par. (a), or in place of them? If it is the former, this could be clarified by inserting at the beginning of par. (c): "In addition to the requirements under par. (a),"; if it is the latter, this could be clarified by inserting at the beginning of par. (a): "Except as provided in par. (c),". The same applies to subsequent parallel provisions.

k. Section NR 421.05 (3) (a) (intro.) should be amended to state that par. (b) applies to the specified facilities, not pars. (a) and (b). The same applies to subsequent parallel provisions.

l. Section NR 421.05 (4) makes incorrect use of the introduction format. An alternative way to draft that provision is as follows:

NR 421.05 (4) RECORDKEEPING. (a) Except as provided in par. (c) and in addition to the applicable recordkeeping requirements of s. NR 439.04, the owner or operator of a synthetic resins manufacturing facility shall collect and record the following information, as applicable:

1. Total volume of virgin solvents used in each month.
2. VOC content in kilograms per liter or pounds per gallon [of the virgin solvents used in each month?].
3. VOC composite partial vapor pressure in mm Hg at 20° C [of the virgin solvents used in each month?].

(b) The owner or operator of a synthetic resins manufacturing facility shall maintain the information under par. (a) at the facility for a minimum of 5 years and shall make the information available

to an authorized department representative at any time during normal working hours.

(c) The provisions of par. (a) do not apply to solvent or solvent solution that is used....

Note the minor wording changes included in this alternative. The same, in general, applies to subsequent parallel provisions.

m. The treatment clause of SECTION 26 lacks the statement that the provision is being renumbered.

n. The treatment clause of SECTION 36 should read: "NR 422.05 (1) is renumbered NR 422.05 (1) (intro.) and amended to read:". The same applies to subsequent parallel provisions.

o. The rule creates several new tables in ch. NR 422 and numbers all but one of them, Table 1. The tables should be numbered sequentially in the chapter, accounting for the several tables already in the chapter. Any rule text referring to a table should also reflect the correct numbering.

p. The initial applicability provisions in s. NR 422.05 (3) (intro.) should read: "Beginning on the first day of the 13th month after the effective date of this subsection... [LRB inserts date],". The same applies to subsequent, parallel provisions. Alternatively, these clauses could be drafted collectively in a single, nonstatutory initial applicability provision at the end of the rule. [See s. 1.02 (3m), Manual.]

q. It appears that SECTION 56 should renumber all of s. NR 422.127 (2), rather than only s. NR 422.127 (2) (intro.).

r. The treatment of s. NR 422.14 results in a clear statement of what subs. (2), (3), and (5) apply to and a clear statement of what sub. (4) does *not* apply to, but *no* statement of what sub. (4) *does* apply to. It appears that a par. (b) is missing from sub. (1), similar in substance to s. NR 422.05 (1) (b).

s. The note following s. NR 422.144 (4) (a) 1. seems to be more than explanatory; it is essentially defining a term that will determine the applicability of certain requirements. It appears this should be placed in the text of the rule, rather than a note.

t. SECTION 74 should read:

SECTION 74. NR 422.15 (1) (a) to (k) are renumbered NR 422.15 (1) (cm) 1. to 9.

u. In SECTION 78, s. NR 423.02 (8) should be renumbered NR 400.02 (85m), not (86m).

4. Adequacy of References to Related Statutes, Rules and Forms

a. In s. NR 421.07 (3) (a) 5. and (4) (a) 5., should "this section" be "this subsection"?

b. In s. NR 422.05 (1m) (f), "subd." should be changed to "sub.".

- c. In s. NR 422.08 (4) (b) 3., the two occurrences of “par.” should be changed to “sub.”.

5. Clarity, Grammar, Punctuation and Use of Plain Language

a. In s. NR 419.045 (4) (e) g., what are “the appropriate operating parameters,” and who determines this?

b. The definition of “wipe cleaning,” in s. NR 421.02 (23), does not seem necessary. In addition to its meaning being quite obvious, the term is used only twice in the rule, apart from the definition. Is there any possibility of the term being misconstrued?

c. In s. NR 421.05 (2m) (a) (intro.), “except as provided in par. (b)” should be moved to the beginning of the sentence. Also, this provision states that an owner or operator “shall use *at least one* of the following cleaning methods...” (emphasis added). It is unclear whether there are circumstances in which more than one cleaning method would have to be used. If the owner or operator is not required to use more than one method, “at least one” should be replaced by “any”. If the owner or operator is required to use more than one method under certain circumstances, those should be specified.

d. In s. NR 421.05 (2m) (a) 1., the phrase “less than or equal to 8 mm...” should be “less than or equal to 8 mm...”. The same applies to subsequent parallel provisions.

e. Since the term “screen reclamation” is still used in the definition of “screen printing unit” and, indirectly, in s. NR 422.145 (2) (d), it appears that the definition of that term, which is repealed in SECTION 30, should be retained.

f. In s. NR 422.05 (1m) (a) to (h), it might be helpful to group together the exemptions that pertain to all of sub. (3) [currently in par. (a), (b), and (h)], followed by those applicable just to certain paragraphs of sub. (3). Note that this suggested grouping is done in s. NR 422.145 (1m).

g. In s. NR 422.05 (1m) (c), should “performance laboratory tests” be “performing laboratory tests”? The same applies to subsequent parallel provisions.

h. In s. NR 442.135 (1) (b), how will it be determined that the use in aggregate “never exceeds” 500 gallons, until the year is over? Also, what would happen if that limit were ever exceeded in a year? It appears that “per” should be replaced by “in a”.

i. The note following s. NR 422.144 (1) (a) is confusing, the last clause, in particular. Breaking it into two sentences may improve the clarity.

j. Should s. NR 422.144 (2) (intro.) state that the specified retention factors and capture efficiencies *shall* be used? If a person chooses not to use them, what is the alternative?

k. The wording of s. NR 423.037 (2) (a) 4. k. and subsequent, parallel provisions is awkward. Would it be correct to revise the inserted language to say “excluding use of industrial adhesives and adhesive primers”?