

# WISCONSIN LEGISLATIVE COUNCIL STAFF

## RULES CLEARINGHOUSE

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## CLEARINGHOUSE RULE 94-211

### Comments

**[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated October 1994.]**

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

a. Section NR 422.142 (2) (a) 1 and 2 require a reduction in volatile organic compound emissions by a specified percentage but do not state the bench mark for the reduction.

b. In s. NR 422.142 (5) (b) (intro.), the period concluding the introduction should be replaced by a colon.

c. The compliance testing requirements in s. NR 422.142 (5) (b) 1 and 2 contain an inconsistency. An emission test is required either every 24 months or 48 months, but each test must be performed within 90 days of the anniversary date of the previous emission test. If the owner or operator uses any part of the 90-day grace period, the time between emission tests will be greater than 24 months or 48 months. Can this inconsistency be resolved by measuring the 90-day grace period from the anniversary date of the first emission test? If this is done, is it clear under the proposed rule when the first emission test occurs?

d. The phrase “which is subject to this section” is used in s. NR 422.142 (6) (a), (b) and (c) 1. This phrase is not used consistently throughout the rule [for example, see s. NR 422.142 (4)] and, in any case, the applicability provision in s. NR 422.142 (1) (a) should make the use of this phrase unnecessary.

e. Could the first sentence in s. NR 422.142 (6) (a) be clarified by specifying that it refers to printing presses “installed on or before July 1, 1996”?