

From: [Kent Hubbard](#)
To: [Salmon, Olivia E - DNR](#)
Subject: RE: Notice: DNR comment period on economic impact of proposed revisions to ch. NR 439
Date: Tuesday, December 19, 2023 12:44:50 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image006.png](#)

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Olivia,

We would like to comment on the EIA of the proposed changes to NR 439.055.

We believe it is not correct to say that the proposed changes add flexibility to the rule. Both the existing rule and the proposed rule allow no more than 12 months (yearly) between calibrations. In addition, if a manufacturer's recommendation is to calibrate at frequencies of less than one year but currently a facility is using operational history to calibrate on a yearly basis or longer, under the proposed rule they would calibrate more often. If calibration is required more often that may mean shutting down the emission source more frequently, which is likely to result in higher costs. Therefore, a \$0 implementation cost cannot be estimated from these proposed changes.

Thank you for taking these comments.

Kent Hubbard

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From: Salmon, Olivia E - DNR <olivia.salmon@wisconsin.gov>
Sent: Wednesday, December 13, 2023 8:20 AM
To: Salmon, Olivia E - DNR <olivia.salmon@wisconsin.gov>
Subject: Notice: DNR comment period on economic impact of proposed revisions to ch. NR 439

Some people who received this message don't often get email from olivia.salmon@wisconsin.gov. [Learn why this is important](#)

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Greetings,

This email is to inform you that the Wisconsin Department of Natural Resources (DNR) is currently developing rule revisions to ch. NR 439, Wis. Adm. Code. The purpose of the proposed rulemaking is to simplify, reduce, update, and make more efficient the reporting, recordkeeping, testing, inspection and determination of compliance requirements for sources of air contaminants. You are receiving this email because DNR believes you may be affected by or interested in the proposed rule.

The DNR has developed a draft Economic Impact Analysis (EIA) and is holding a public comment period to solicit any additional information or advice on the economic effect of the proposed rule. Note that a separate public comment period on the rule itself will be held after the economic impact analysis has been finalized.

Materials for review may be found on the DNR's website at <https://dnr.wisconsin.gov/news/input/ProposedPermanent.html> under NRB Order Number AM-05-22. Comments will be accepted from December 13, 2023, through January 12, 2024.

Please direct any comments on the EIA or questions to Olivia Salmon at Olivia.Salmon@wisconsin.gov.

Thank you,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Olivia Salmon

she/her/hers

State Implementation Plan and Administrative Rules Coordinator – Bureau of Air Management

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