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**Sent:** Friday, April 5, 2024 3:19 PM  
**To:** DNR Administrative Rules Comments <DNRAAdministrativeRulesComments@wisconsin.gov>  
**Subject:** FW: Air News: Public Comment Period For Proposed Rule AM-05-22 To Update Ch. NR 439

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To whom it may concern:

Contained herein is a comment related to NRM Order No. AM-05-22 for proposed revisions to Wis. Admin. Code Chapter NR 439.

**Comment #1 – Control Device Pressure Drop Monitoring Accuracy**

**Citation:** NR439.055(3)(b)

**Current Language:** “The pressure drop monitoring device shall be accurate to within 5% of the pressure drop being measured or within 1 inch of water column, whichever is greater.”

**Proposed Language:** “The pressure drop monitoring device shall be accurate to within 5% *percent* of the pressure drop being measured ~~or within ±1 inch of water column, whichever is greater.~~”

**Comment:** Meter accuracy within 5% is overly stringent, particularly for control devices held to reporting more significant figures in the pressure drop. Relative to Title V Permit No. 241007030-P30, this would equate to meter accuracy in the thousandths place for differential pressure as shown below:

Permitted Control	Permit Operating Range (inches of water)	Meter Accuracy (within 5%)
C12 N/S	1-5	0.05
C35	0.05 to 6	0.0025
C37	0.5-6	0.025
C33A	0.1 – 6.0	0.005
C19A	0.5-6	0.025

It would be more reasonable and achievable from an instrumentation standpoint to modify the language to state “The pressure drop monitoring device shall be accurate to within 5% of the pressure drop being measured or within *0.01* inch of water column, whichever is greater.”

Thank you for your consideration of this comment.

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