

Feedback Session: Non-CTG VOC RACT Rules

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Definitions

- RACT: Reasonably Available Control Technology
 - Mandatory in moderate or above nonattainment areas, RACT requires facilities to control emissions considering technological and economic feasibility.
- CTG: Control Technique Guideline
 - CTGs are written by EPA and used to help determine VOC RACT for specific types of source categories.
- VOC: Volatile Organic Compounds
 - A precursor to ozone.
- Non-CTG VOC RACT
 - Non-CTG VOC RACT regulates sources that do not fall into a CTG category and are a major source for VOC emissions.

Agenda

- Purpose of rulemaking
- Review and discuss rule revisions
- Discuss questions and feedback from stakeholders
- Discuss opportunities to provide feedback on the drafted rule revisions

Topic 1

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Background of Rulemaking

- Four reasons non-CTG VOC RACT program is not federally approvable:
 - NR 424 is not approved into the SIP as RACT
 - The current alternative pathway (LACT) is not always equivalent to RACT
 - Alternative RACT demonstrations need to be approved by both DNR and EPA
 - Rule requirements do not cover all emissions processes subject to RACT
- Changes to NR 424 focus on addressing these areas

Purpose of Rulemaking

- Streamline and modernize chapters NR 419 through 425 Wis. Adm. Code
- Meet federal requirements – approvable VOC RACT program
- Limit emissions of ozone-forming VOCs and protect air quality in nonattainment areas
- Incorporate CTGs previously unincorporated in Wis. Adm. Code

Current Rules: NR 419 through 425

Rule Chapter	Chapter Description
NR 419	General VOC emission limitations
NR 420	Petroleum and gasoline sources (CTGs)
NR 421	Chemical, coatings, and rubber products manufacturing (CTGs)
NR 422	Control of VOC emissions from surface coating, printing and asphalt surfacing operations (CTGs)
NR 423	Control of VOC emissions from solvent cleaning operations (CTGs)
NR 424	Control of VOC emissions from process lines (85% control or implementation of Latest Available Control Technology (LACT))
NR 425	Compliance schedules, delays, exceptions and internal offsets for VOC emission sources in NR 419 through 424.

Topic 2

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Overview of NR 424 Revisions

RACT Approvability

- Attainment area requirements will not be changed in this rule
- Incorporate a RACT equivalent alternative pathway for facilities in nonattainment areas that cannot meet the 85% control limit due to demonstrated technology or cost limitation
- Add rule language to ensure coverage of process types other than “process lines” at sources in nonattainment areas
- Up to 24 "non-CTG major" sources may be affected

Overview of NR 424 Revisions (cont.)

Streamlining and Consistency

- Move Aerosol Can Filling section (NR 424.04) to NR 419
- Remove Yeast Manufacturing section (NR 424.05) from rule language

(New) Alternative RACT Pathway

- Elements of alternative “RACT Study”:
 - List of all technically feasible control technologies
 - Evaluation of each control (e.g., control cost)
 - Proposed RACT limitation
- Facilities with affected process lines are likely already doing some of RACT Study effort
 - An analysis is currently required to demonstrate infeasibility for the existing 85% control emission limit under s. NR 424.03
 - RACT Study also needs to evaluate control measures < 85%

(New) Coverage of Non-Process Line Sources

- Estimate nine categories of “other processes” at non-CTG major sources would be newly subject to 85% control or alternative RACT Study:
 - Can Shredding / Crushing
 - Emergency Generators
 - Extruders
 - Fuel Combustion
 - Industrial Laundering Operations
 - Metals Manufacturing Operations
 - Painting/Coating Operations (not covered under NR 422)
 - Storage/Product Tanks (not covered under NR 419)
 - Wastewater Treatment Operations (not covered under NR 419)
- Some “other processes” are likely exempt (e.g., low emissions) or may currently demonstrate RACT equivalency (e.g., BACT)

NR 424 Revisions – Compliance

- There will be no changes to sources located in an area attaining the ozone NAAQS.
- No change to sources below the VOC major source threshold in nonattainment areas
- Major sources of VOC in nonattainment area are subject to new requirements. Compliance with proposed changes:
 - Facility-level non-CTG VOC PTE limit below major source threshold
 - Process-level VOC exemption status (e.g., 15 lbs/day)
 - 85% VOC control for all affected processes
 - Alternative VOC RACT Study evaluating all affected processes

NR 419

- Parts of chapter NR 419 are considered non-CTG VOC RACT for specific types of sources
- These rules have limits and applicability that the EPA previously determined to be RACT
- During this rulemaking, the DNR will need to review RACT equivalency
 - Review other states with similar rules and compare to WI rules

Overview of NR 419 Revisions

- Moving NR 424.04 (Aerosol Can Filling) to ch. NR 419.
 - In the initial RACT evaluation, DNR identified at least one more stringent RACT rule in the region.
- Aligning geographic applicability with 2015 Ozone NAAQS requirements
- Minor edits to test methods, definitions, etc

Topic 3

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Questions and comments?

Topic 4

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Input on Rule Revisions

- Send feedback and questions to Emma Cleveland at Emma.Cleveland@Wisconsin.gov
- Reference specific sections or subsections of the rule text in feedback.
- Share feedback you would like considered by July 8, 2026.

CONNECT WITH US

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