

# VOC RACT Rulemaking Information Session

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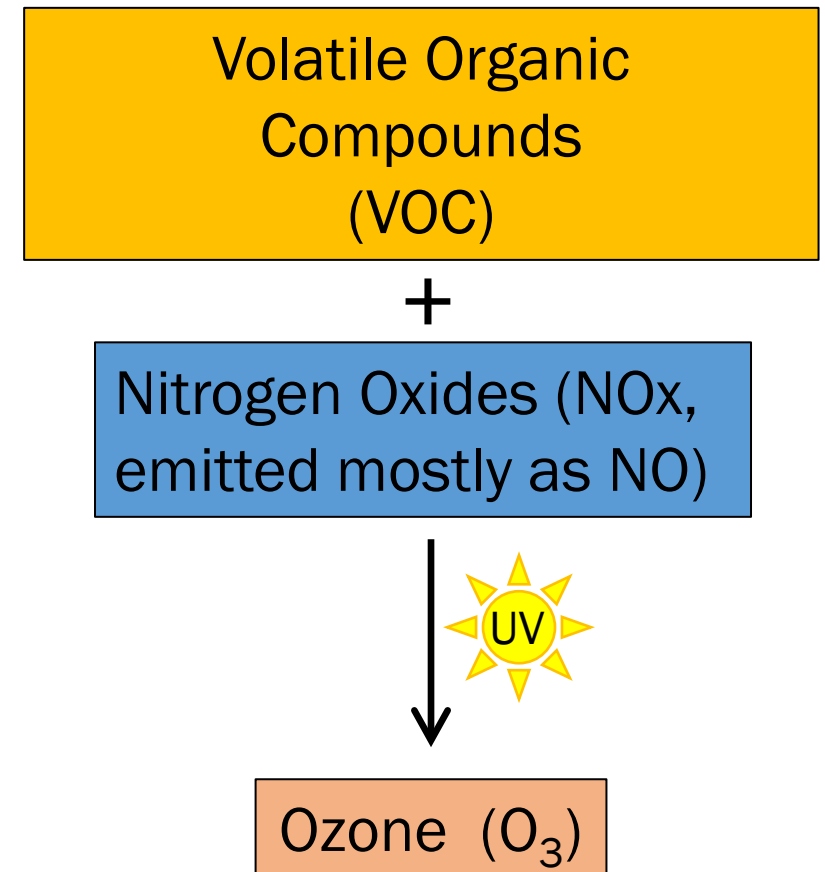
April 30, 2026

# Agenda

- Background of VOCs and VOC RACT
- Purpose of rulemaking
- Description of NR 419 through 425
- Proposed revisions
- Future opportunities for feedback from stakeholders

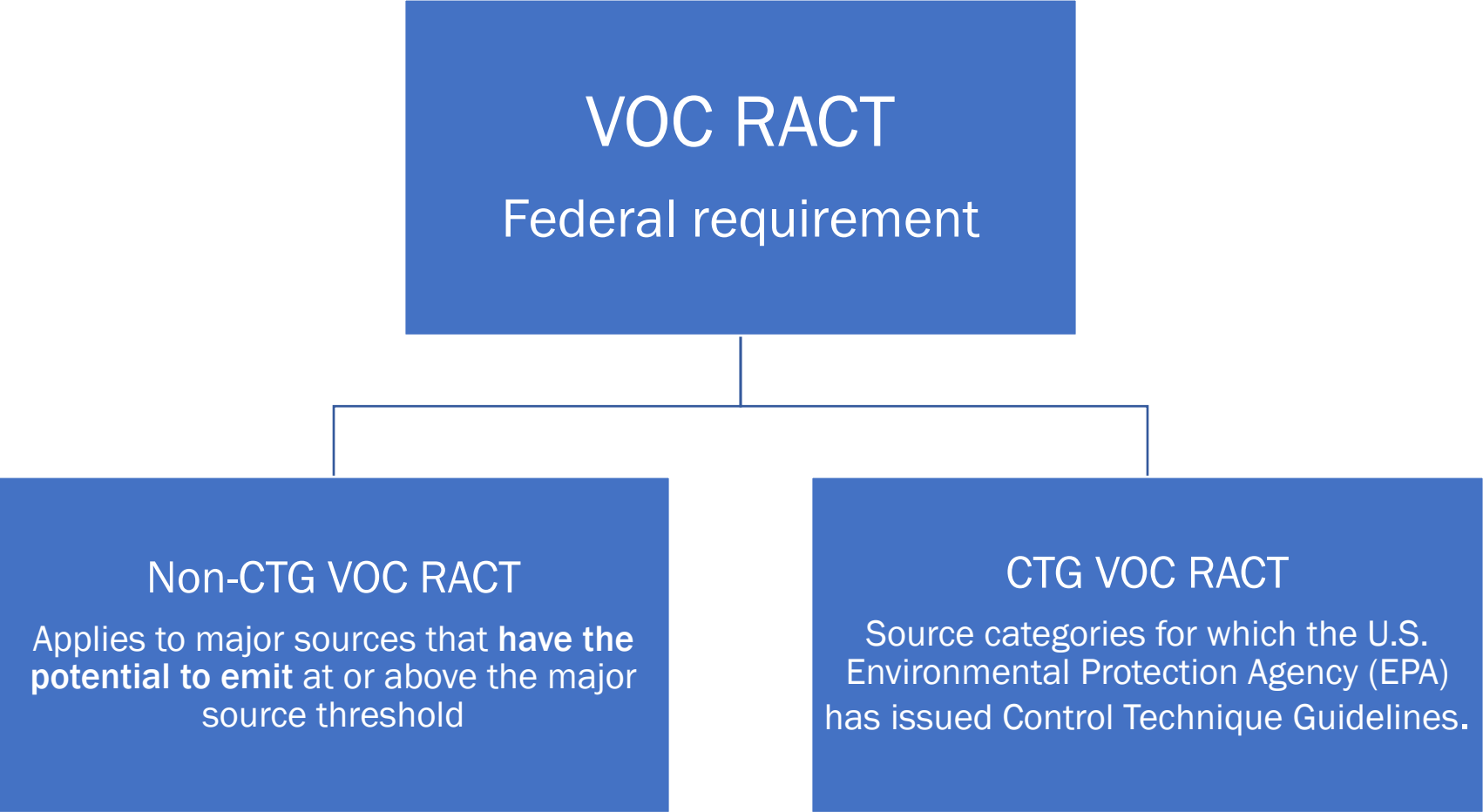
# Background - VOCs

- Volatile Organic Compounds (VOCs)
  - Compounds with high vapor pressure and low water solubility
  - Precursor emission to ozone
  - Three ozone nonattainment areas in WI for the 2015 National Ambient Air Quality Standard (NAAQS)



# Background - RACT

- Areas classified as Moderate nonattainment or above are required to implement Reasonably Available Control Technology (RACT) to limit emissions of VOCs.
- RACT establishes emission requirements for emission units at applicable sources based on available control technologies and cost-effectiveness.
- VOC RACT applies to two groups of emission sources.
  - Source categories for which the EPA issues Control Technique Guidelines (CTGs)
  - Other sources that emit VOCs at or above the major source threshold known as “non-CTG major sources”



# Purpose of Rulemaking

- EPA Letter - VOC regulations in NR 419 through 425 are not meeting VOC RACT requirements and require updates
- Purpose of this Rulemaking
  - Meet federal requirements – approvable VOC RACT program.
  - Limit emissions of ozone-forming VOCs and protect air quality in nonattainment areas.
  - Streamline and modernize chapters NR 419 through 425 Wis. Adm. Code.
  - Incorporate CTGs previously unincorporated in Wis. Adm. Code.
  - Limit ozone-forming substances and meet Clean Air Act requirements.



# 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.



# Proposed Revisions: NR 419

- Review rule language for streamlining and consistency including removal of language and updating test methods where necessary.
- Ensure all applicable sections of this chapter are RACT equivalent, specifically for emission limits.
- Ensure applicability is consistent with RACT requirements.

# Proposed Revisions: NR 420

- Updates identified:
  - Compliance dates
  - Testing and reference methods
  - Applicability
  - Other clarifying language, and update language to be consistent with future ozone National Ambient Air Quality Standards (NAAQS) and classification changes evergreen
- Ongoing discussions of opportunities to revise existing truck sticker pressure vacuum compliance requirements

# Proposed Revisions: NR 422

- Update testing and reference methods, incorporate clarifying language, and ensure applicability is consistent with RACT requirements.
- Create sections to incorporate CTGs into Wisconsin Administrative Code
  - Aerospace Manufacturing and Rework
  - Shipbuilding and Ship Repair
  - Fiberglass Boat Manufacturing
- Update language to be consistent with the current Automobile and Light-Duty Truck Assembly Coatings CTG

# Proposed Revisions: NR 424

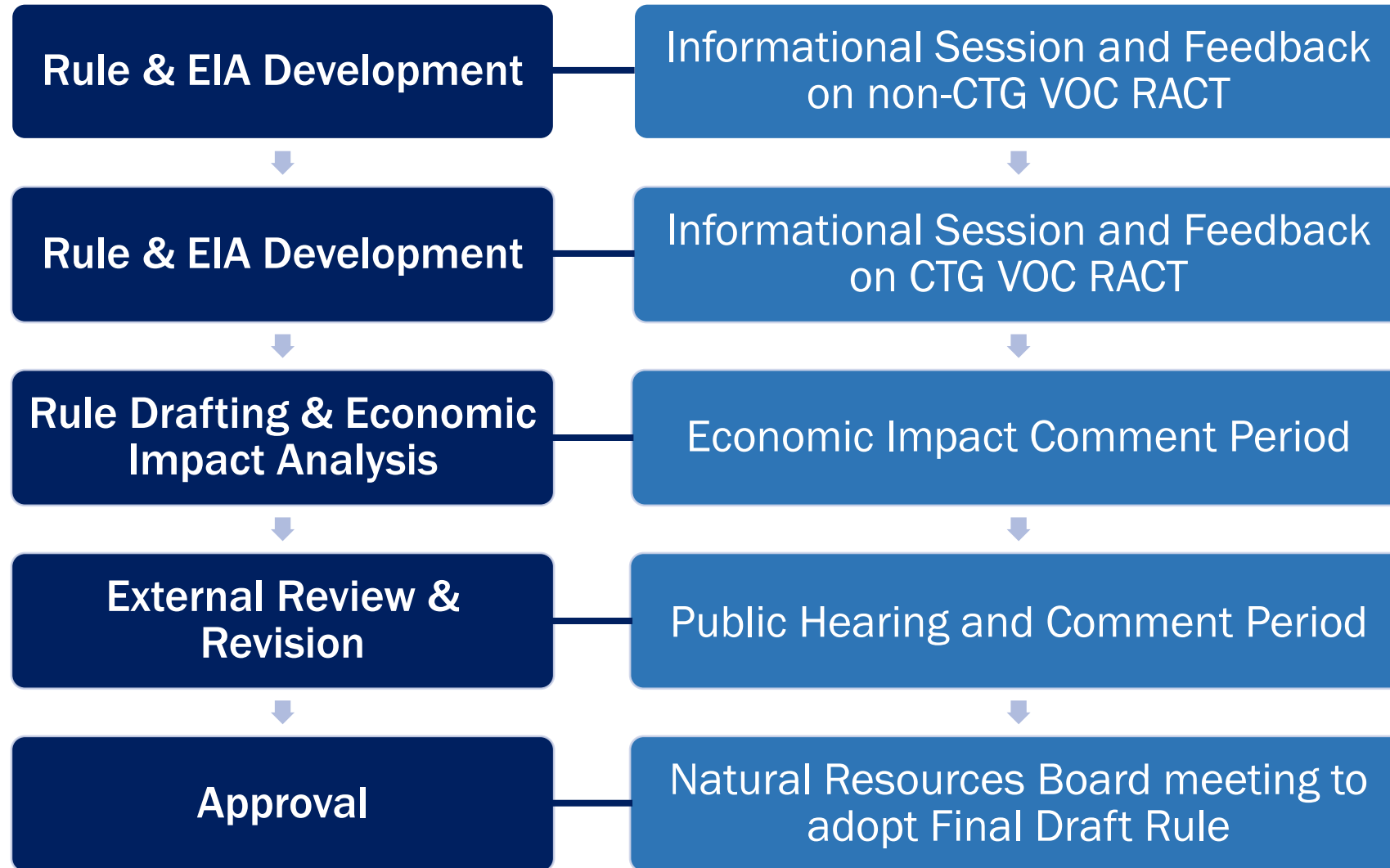
- Incorporate a RACT equivalent alternative pathway for facilities in nonattainment areas that cannot meet the 85% control limit due to demonstrated technology limitation or cost
- Add rule language to ensure coverage of process types other than “process lines” at sources in nonattainment areas
- Structural changes
  - Move Aerosol Can Filling section to NR 419
  - Remove Yeast Manufacturing section from rule language

# Proposed Revisions: NR 421, 423 and 425

- Update testing and reference methods, incorporate clarifying language, and ensure applicability is consistent with RACT requirements.
- Remove dated language to improve clarity of compliance schedules.
- Review cross references.

## Rule Process

## Opportunities for public input





# Two Upcoming Feedback Sessions



## Discussion at Feedback Sessions

- Edits to rule language
- Emission limit changes
- Geographic applicability of rules
- Impacted sources
- Compliance Schedules

# CONNECT WITH US

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OFF THE RECORD"