



March 3, 2021

Maria Hill, P.E.
Compliance, Enforcement & Emission Inventory Section Chief
Bureau of Air Management
Wisconsin DNR
101 S. Webster St.
Madison, WI 53703

ELECTRONICALLY SUBMITTED

Re: Wisconsin Cast Metals Association
Comments on WDNR Next Business Day Deviation Reporting Guidance

Dear Ms. Hill,

Wisconsin Cast Metals Association (WCMA) appreciates the opportunity to comment on the draft guidance document provided by the Department regarding next business day deviation reporting (dated February 9, 2021). WCMA is our trade association consisting of some 30 member firms, representing more than 18,000 employees and approximately 85% of the production of metal castings in Wisconsin, recognized as one of the strongest metalcasting States in the U.S.

WCMA is proud of our history in working with WDNR to facilitate "cooperative regulation" and provides this feedback.

- In the referenced NR 439.03(4), the area of WCMA membership concern is the requirement to submit a next business day notification for applicable Section NR 439.03(4)(c) occurrences which in some cases may be administrative in nature (not representing excess emissions) and potentially difficult to identify and confirm in the abbreviated period of time available as provided by the Guidance.
- Metalcasting facilities are required to monitor, review and document a significant amount of information in order to demonstrate ongoing compliance with applicable permit requirements. Due to this volume of information, a facility may not be able to conduct a complete review, and provide a final determination of compliance, in a single day time period.
- The expectation of reporting as stated by the Guidance is significantly accelerated as compared to the amount of evaluation time allowed by U.S. EPA. For these reasons, additional time should be provided to the regulated community to allow accurate



compliance determinations. Thus, it is recommended that reporting of Section NR 439.03(4)(c) occurrences that are not causing excess emissions be allowed to be reported, with the time available, after a deviation event has been identified, reviewed and confirmed.

If you have any questions or need additional information, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Steve Lewallen". The signature is written in a cursive style with a long, sweeping underline.

Steve Lewallen
Executive Director, Wisconsin Cast Metals Association