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July 12, 2017,

VIA EMAIL
DNRAdministratorRulesComments@wisconsin.gov
Tom.trainor@wisconsin.gov

Mr. Tom Trainor
Certification Services/BEAS
Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313

RE: Comments on Revisions to Wis. Admin. Code ch. NR 149

Dear Mr. Trainor:

Thank you for the opportunity to submit comments on proposed updates to NR 149. We are writing on behalf of the Municipal Environmental Group – Wastewater Division (MEG), which is an association of almost 100 municipalities throughout the state of Wisconsin who own and operate wastewater treatment facilities.

The current revisions to NR 149 do not address DNR's prohibition on the use of pre-programmed or built-in calibration curves. Such curves are U.S. EPA approved, and they provide reliable and accurate data. The use of pre-programmed curves would save many MEG member labs significant time and resources.

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We request that DNR revise current language in NR 149 to allow labs to use any calibration procedures approved by the U.S. EPA, including pre-programmed calibration curves.

Very truly yours,

A handwritten signature in cursive script that reads "Vanessa D. Wishart".

Paul G. Kent

Vanessa D. Wishart

PGK/VDW:mai