



Wisconsin Legislative Council

RULES CLEARINGHOUSE

Scott Grosz
Clearinghouse Director

Anne Sappenfield
Legislative Council Director

Margit Kelley
Clearinghouse Assistant Director

CLEARINGHOUSE RULE 21-101

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Council Staff and the Legislative Reference Bureau, dated November 2020.]

5. Clarity, Grammar, Punctuation and Use of Plain Language

a. In SECTION 1 of the rulemaking order, the table entry for clothianidin is misspelled. It should read “clothianidin” not “clothiandin” (underlining provided for emphasis).

b. In SECTIONS 1 and 3 of the rulemaking order, the agency could consider omitting the capitalization of the word “diketonitrile” in the table entries that refer to isoxaflutole diketonitrile degradate. Similarly, the agency could consider omitting the capitalization of “benzoic acid” in the entries that reference isoxaflutole benzoic acid degradate.

c. In SECTION 1 of the rulemaking order, the agency could add “(PCE)” to the left column for the entry of tetrachloroethylene. Similarly, “PCE” could be added to the common synonyms for tetrachloroethylene in Appendix I to Table 1.

d. In the common synonyms for hexavalent chromium provided in SECTION 3 of the rulemaking order, should “Cr6+” instead read “Cr⁶⁺”?

e. In SECTION 3 of the rulemaking order, the table entry for Dacthal lists “DPCA” as a synonym. This should instead read “DCPA”.

f. Both SECTIONS 1 and 3 of the rulemaking order refer to Dacthal. However, it appears that “Dacthal” is a trade name, rather than a technical name for the substance in question. Given the agency’s proposed removal of trade names from Appendix I to Table 1, the agency could consider referring to the chemical as dimethyl tetrachloroterephthalate (DCPA) in Table 1 and Appendix I to Table 1, rather than using the term “Dacthal”.

g. SECTION 3 of the rulemaking order appears, in part, to eliminate all trade names from Appendix I to Table 1. However, the order retains various italicized terms in Appendix I to Table 1, including “Freon 12”, “Freon 11” [sic], and “Hexone”. Similarly, it is unclear if “Freon 22” is a trade name, given its lack of italics in the table. Given the proposed changes to footnote 2 that would eliminate the explanation for the italics, should these terms be removed from the Appendix

I to Table 1? Alternatively, if these are not trade names, the agency could consider reformatting these terms to remove the italics.

h. In the entry for “perfluorooctanoic acid (PFOA) + perfluorooctane sulfonate (PFOS)” in Appendix I to Table 1, it appears redundant to relist both of these substances and their acronyms in the column that provides common synonyms.