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Mr. J. Wick Havens, Chief
Division of Air Resource Management
Bureau of Air Quality
Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street, 12th floor
Harrisburg, PA 17105-8468

Subject: GMIC Comments – Ozone Transport Commission proposed NOx rule for Glass Manufacturers

Dear Mr. Havens:

On behalf of the Glass Manufacturing Industry Council (“GMIC”) and the member companies of this trade association, I am submitting comments on the Ozone Transport Commission’s (“OTC”) proposed Control Measure for the glass/fiber glass furnaces source category.

GMIC is a trade association of the United States manufacturers of glass representing the primary sectors of flat, container, fiber, and specialty glass. Its mission is to facilitate, organize and promote the interests and economic growth of the U.S. glass industry through education and cooperation in the areas of technology, productivity, innovation and the environment.¹

GMIC has identified concerns regarding the proposed Control Measure that initially impacts operations located in eastern OTC states. Since it is possible that other regions may develop similar proposals in the future, GMIC considers it beneficial to comment early in the rule making process to reflect the U.S. glass industry’s concerns. GMIC believes that the following issues should be considered with regard to the proposed Control Measure.

First, OTC’s control measure does not distinguish between the various manufacturing sectors of glass. Flat glass, container glass, fiber glass and specialty glass sectors produce different products, have different capacities and energy demands, and have different baselines for NOx. Furnace design considerations and the length of rebuild campaigns also vary between sectors. Some facilities may already be equipped with oxy-fuel firing, or other technology to reduce NOx. Therefore, Control

¹ GMIC represents the following glass companies: Arc International; Advanced Glassfiber Yarns, LLC; Automotive Component Holdings, LLC; CertainTeed Corporation; Corning Incorporated; Evanite Fiber Corporation; Ferro Corporation; International Melting and Manufacturing, LLC; Johns Manville; Knauf Insulation; Leone Industries, Longhorn Glass Corporation; Owens Corning; Owens-Illinois; PPG Industries, Inc.; World Kitchen, LLC

Measures should account for the differing products and furnace types or provide appropriate flexibility for choosing an appropriate technology to meet emission reduction requirements.

GMIC is also concerned with the Control Measure's presumed 85% reduction for all furnaces as well as the cost estimates to achieve that reduction. A preliminary review of the data indicates that there could be inaccuracies in OTC's baseline assumptions and a more detailed review may be required. In addition, a blanket 85% reduction mandate does not account for existing differences in regulatory requirements that some furnaces are currently subject to. For example, some furnaces may already be subject to LAER or RACT or may already be equipped with oxy-fuel firing. It is unclear specifically what has been included in the cost (\$/ton) analysis and industry members believe that the total cost impact is under estimated.

The Control Measure also imposes a 2009 implementation timeline. This is impractical and especially burdensome to flat glass operations, both technically and economically. For large flat glass furnaces, campaign cycles last approximately 10-15 years and oxy-fuel implementation can only take place at the time of a rebuild. The operation of a furnace cannot be halted mid-campaign. It is not possible to rebuild all affected furnaces in advance of the short deadline to equip them with oxy-fuel firing. Moreover, the cost of continued operation after 2009, if required to purchase emission credits could be very significant over a long campaign cycle, especially where furnaces have only recently been rebuilt and there remains a long life cycle of 10+ years of operation before the next rebuild. It is also unclear from the Control Measure what the costs of credits may be, the mechanism for how they would be procured, and/or whether sufficient credits exist. It would not be unreasonable to expect that this added cost could easily escalate into the tens of millions of dollars over a single campaign cycle.

Currently the glass industry, and in particular the flat glass industry, is heavily burdened with rising energy and raw material costs, along with global competition from regions of the world where costs associated with energy, labor, transportation, environmental, and other factors are considerably more favorable to manufacturing. The significant costs that will be incurred by the proposed Control Measure for the northeast regional states will add yet another competitive disadvantage to this industry.

In summary, GMIC considers the proposed Control Measure to have potentially far reaching effects on U.S. glass manufacturing, especially for the flat glass sector. Therefore, GMIC requests that both the economic and technical realities imposed by this proposed rule be carefully considered. GMIC appreciates the opportunity to submit comments on behalf of its members for your consideration. Further, GMIC welcomes future opportunities to discuss the industry's concerns with you and/or Mr. Terry Blackwell on this matter.

Sincerely,



Michael Greenman
Executive Director