



June 2, 2006

Lauren P. Alterman
Associate General Counsel

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

RE: Saint-Gobain Corporation's Comments to the Ozone Transport Commission's proposed rule to control NOx emissions from glass manufacturing facilities

Dear Mr. Havens:

Saint-Gobain Corporation ("SGC") has more than 20 facilities within the U.S. where glass furnaces are operated. Most, if not all of those facilities have more than one glass furnace. None of the furnaces is exactly like another. Some of the furnaces are used to melt glass for containers, others melt glass for fiberglass insulation, and still others melt glass for reinforced fiberglass. The furnaces control emissions, and particularly NOx emissions in any number of ways, including, oxy fuel technology, low NOx burners, and process controls. Some of the glass furnaces are electric. There are few, if any, NOx emissions from electric furnaces. Given the variety of glass furnaces within SGC, SGC has a vested interest in the efforts of the Ozone Transport Commission's ("OTC") proposed Control Measure for the glass/fiber glass furnaces source category.

Saint-Gobain joins in the comments that have been articulated by several of the glass trade associations, including, NAIMA, GPI, and GMIC. To summarize some of SGC's concerns:

1. There is a distinct possibility that a facility will have invested substantial time and money in planning to rebuild one or more of its glass furnaces where oxy fuel is not required by the OTC's proposal in the next few years. Glass furnace rebuilds cost millions of dollars and are only done, depending on the type of glass furnace, every five to twelve years. The OTC proposal would penalize these facilities by requiring them to buy offsets for NOx emissions when the state and federal regulations do not appear to require them to do so.
2. The OTC proposal seems to require a specific control technology without any thought to whether existing or future controls or technology are the same or better at controlling

NOx emissions. As such, on its face, without any documents interpreting the proposal, the OTC proposal may be flawed.

3. The OTC proposal appears to be targeting an 85% reduction of NOx from all furnaces without taking into account whether any, or all of the glass furnaces have already installed controls which the applicable state or federal government has determined to be BACT or LAER. As such, it is unclear if the OTC proposal is suggesting that the 85% reduction of NOx emissions is expected from all furnaces, regardless of whether the furnace has installed controls that have been determined to be BACT or LAER, or whether the 85% reduction is only contemplated for those furnaces that have not installed controls.

If an 85% reduction from furnaces with controls is anticipated, it is important for the OTC to understand that it may be virtually impossible for such reductions to be achieved. On the other hand, if the proposed reductions are not contemplated from furnaces that have installed controls, then the OTC needs to review the database upon which its proposal relied. That database includes many furnaces that have either ceased to operate or have installed controls for NOx emissions. As such, the database must be corrected, and to the extent the proposal to reduce NOx emissions by 85% relied upon the database, then the proposal will also have to be corrected.

4. It is unclear where the OTC obtained the information upon which it based the cost effectiveness of installing oxy fuel furnaces on each and every type of glass furnace. It would be helpful if members of the glass industry met with the OTC to discuss the actual costs involved. The information we have suggests that the cost information in the OTC proposal is not accurate, and in fact, the estimated costs could be an order of magnitude higher than that suggested in the proposal.

In order to obtain accurate information about the glass furnaces that the OTC proposal purports to affect, SGC requests a meeting with Terry Black and/or whomever you deem appropriate. SGC contemplates that other glass manufacturers will also want to attend such a meeting in order to submit additional information regarding the manner in which NOx emissions are generated and controlled by glass furnaces.

Very truly yours,


Lauren P. Alterman