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SCHOTT

ENVIRONMENTAL QUALITY BOARD

June 19, 2008

Environmental Quality Board  
P.O. Box 8477  
Harrisburg, PA 17101-8477

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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Re: Comment, Proposed Rulemaking and Amendment, 25 PA. Code Chapters 121 and 129  
Control of NOx Emissions from Glass Melting Furnaces

Environmental Quality Board:

SCHOTT North America, Inc. (Schott) respectfully submits the comments contained herein in response to the proposed rulemaking for control of Nitrogen Oxide (NOx) Emissions from Glass Melting Furnaces published in the Pennsylvania Bulletin on April 28, 2007, and the subsequent amendment published on April 19, 2008. Schott is requesting that the Board exclude its Duryea, PA facility from the requirements of the rulemaking. This request is based on the following comments.

Comment #1 - Source Categories

The proposed rule includes emission requirements for specific categories of glass manufacturing (Section 129.304). These categories include container, pressed or blown, fiberglass, and flat glass manufacturing. However, the proposed rule does not include emission requirements for other types of glass manufacturing, such as specialty glass manufacturing as conducted by Schott's Duryea, PA facility. The Duryea facility manufactures specialty glass products, including optical glass, filter glass, and glass ceramic. The facility manufactures glass products that are formed in molds without pressing or blowing where the mold alone provides the finished outer form of the product. Schott *does not* manufacture container, pressed or blown, fiberglass, or flat glass as defined in proposed PA Code Chapter 121 Section 121.1. Therefore, we request that the Board clarify that the proposed rule does not apply to Schott since it does not meet the applicability criteria as defined in proposed Section 121.1.

Comment #2 - Sources of NOx

The proposed rule is directed at combustion sources of NOx, as evidenced in Paragraph D *Background and Purpose* of PA Bulletin Document No. 07-773<sup>1</sup>. Paragraph D references electrical generating facilities, "certain boilers", turbines, and engines, as the target of the proposed rulemaking, while excluding electrically heated glass furnaces. This strongly suggests that the intent of the rule is to limit emissions of thermal NOx. For Schott, the largest source of NOx emissions (approximately 95%) is from the decomposition of nitrogen-containing raw materials in the batch rather than from thermal NOx from the combustion process. Therefore, we feel that it is inappropriate for the Board to apply the proposed rule to Schott and we request that the Board clarify this point in the final rule. Our basis for excluding NOx emissions from nitrate compounds is further explained in Comment #3 below.

<sup>1</sup> April 28, 2007.

Comment #3 - NOx Control Feasibility

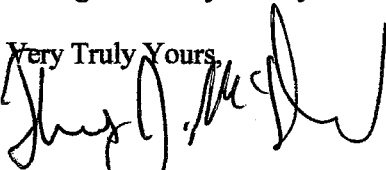
Paragraph D of the proposed amendment (PA Bulletin 08-729, April 19, 2008) refers to selective catalytic reduction (SCR) and selective non-catalytic reduction (SNCR) as add-on control technologies for thermal NOx from glass melting furnaces. Other NOx control approaches include electric boost and oxygen-gas combustion systems, which are used by Schott to minimize the relatively small amount of NOx emissions from combustion. However, SCR and SNCR are not technically feasible control technologies for NOx from nitrate decomposition due to NOx load variability inherent in the production process, where the bulk of NOx emissions occur intermittently. Furthermore, due to the specialized nature of these glass products, reformulation out of nitrate compounds is not a feasible alternative. Therefore, it is requested that the Board exclude Schott from the rule due to the technical non-feasibility of add-on controls.

In summary, our request to exclude Schott from the requirements of the proposed rulemaking is based upon the following:

- The glass type produced by Schott is not included in the proposed rule;
- The intent of the rule is to control thermal NOx emissions;
- For Schott, the bulk of NOx emissions are from material formulations and not thermal NOx;
- Emissions reductions using combustion controls are not sufficient to meet emissions requirements;
- Add-on controls are not designed for reducing intermittent NOx emissions from decomposition of nitrate compounds;
- The Board should explicitly exclude Schott from the rule.

Based on the above, we conclude that Schott should be excluded from the rule. We respectfully request that the Board carefully consider these comments and trust that you will agree with our findings. Thank you for your consideration in this important matter.

Very Truly Yours,



Thomas J. McDonald  
Manager, Environmental, Health and Safety  
SCHOTT North America, Inc. - Duryea

cc: Jon Norman, P.E., O'Brien & Gere Engineers