

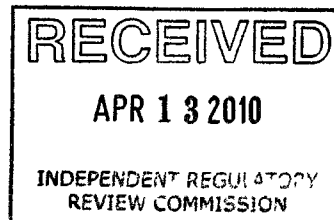
ADVANCED NOTICE OF FINAL RULMAKING
#2683
EQB #7-420
CONTROL OF NO_x EMISSIONS FROM GLASS
MELTING FURNACES



October 2, 2009

#2683

Ms. Jane Mahinske
Division of Air Resource Management
Bureau of Air Quality
Rachel Carson State Office Building
12 th floor
P.O. Box 8468
Harrisburg, PA 17101-8468



Subject: Advance Notice of Final Rulemaking (ANFR) for 'Control of NOx Emissions from Glass Melting Furnaces'

Dear Ms. Mahinske;

Guardian Industries Floreffe is providing the following comments for the official record on the ANFR for 'Control of NOx Emissions from Glass Melting Furnaces.'


The language in §129.304(b) suggests that Department must approve the alternate emission limitation or compliance schedule prior to January 1, 2011. However, section §129.304(c)(3) clearly indicates that the petition need only be submitted by January 1, 2011. Clarification should be made in §129.304(b) that the petition need only be submitted before January 1, 2011 and does not require Department approval by that date.

In §129.304(c)(1), the rule should provide definitional criteria for what "economically or technically infeasible" is, in order to demonstrate and obtain the 'Department's satisfaction'. There are many possible interpretations as to what might qualify as economically or technically infeasible. The glass industry would like some level of certainty as to what would qualify to obtain Department approval for an alternative emission limitation.

Pursuant to §129.309a Compliance demonstration, Guardian Industries Floreffe requests an increase from 30 to 45 days after the end of the quarter to perform calculations and reporting. The content and volume of the submittal requires at least 45 days to compile, validate, check, and submit.

If you have any questions or require any clarification to these comments, please contact me by telephone at 412.384.3400 or by e-mail at jdaoust@guardian.com.

Sincerely,


Joel Daoust
Plant Manager

