

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



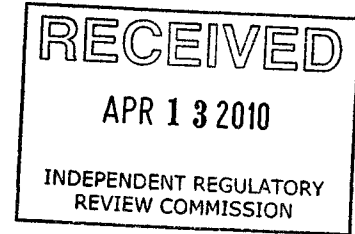
Celebrating 75 Years
of Energy Efficiency

NAIMA
NORTH AMERICAN INSULATION
MANUFACTURERS ASSOCIATION

2683

VIA OVERNIGHT MAIL AND E-MAIL

October 14, 2009



Ms. Jane Mahinske
Division of Air Resource Management
Bureau of Air Quality
Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street, 12th Floor
P.O. Box 8468
Harrisburg, PA 17101-8468

Re: Advance Notice of Final-Form Rulemaking Changes – Control of NOx Emissions from Glass Melting Furnaces

Dear Ms. Mahinske:

Set forth below are the North American Insulation Manufacturers Association's ("NAIMA") comments on the Pennsylvania Department of Environmental Protection's ("PA DEP") Advance Notice of Final-Form Rulemaking Changes for the "Control of NOx Emissions from Glass Melting Furnaces" (September 12, 2009). NAIMA appreciates the opportunity to provide these comments. NAIMA is the association of North American manufacturers of fiber glass, rock wool, and slag wool insulation products.

NAIMA affirms the PA DEP's Final Rule for Control of NOx Emissions from Glass Melting Furnaces. In submitting these comments, NAIMA also references its comments of June 19, 2008.

NAIMA supports adoption of NOx emission limits for fiber glass and rock and slag wool insulation plants consistent with the 4.0 lbs/ton of product pulled limit adopted by the Ozone Transport Commission ("OTC"). When the OTC adopted a 4.0 lbs/ton NOx emission limit, it did so with a November 15, 2006 resolution¹ recommending this emission limit to its 13 member states after a lengthy, thorough emissions inventory and review process. NAIMA also supports the adoption of a performance standard based on the OTC limits. Moreover, the OTC-adopted limit of 4.0 lbs/ton NOx emission is the same as the limits adopted by other jurisdictions.

¹ OTC Resolution 06-02-A1, "Addendum to Resolution 06-02 of the Ozone Transport Commission Concerning Coordination and Implementation of Regional Ozone Control Strategies for Various Sources," November 15, 2006.

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A NOx emission limit of 4.0 lbs/ton of glass pulled is appropriate for several reasons. First, a performance standard based on a 4.0 lbs/ton of glass pulled emission limit is a technologically feasible and pragmatic approach that requires implementation of low-NOx combustion technology. Second, a 4.0 lbs/ton of glass pulled emission limit is supported by regulatory precedent and the OTC recommendation and therefore would help create uniformity in emission standards.

Adopting this emission limit not only reduces emissions but promotes and preserves the same emission limit established for the industry by the Ozone Transport Commission and other jurisdictions. Maintaining a uniform NOx emission limit throughout the country provides the industry a predictable and manageable regulatory scheme, and it also prevents inequities among the other jurisdictions.

Sincerely,

Angus E. Crane

Angus E. Crane

Executive Vice President, General Counsel