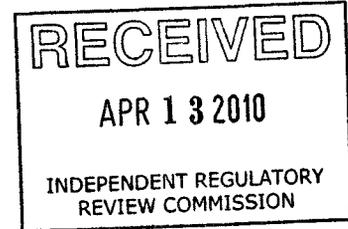


ADVANCED NOTICE OF FINAL RULMAKING
#2683
EQB #7-420
CONTROL OF NO_x EMISSIONS FROM GLASS
MELTING FURNACES

2683



October 9, 2009

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

RE: Comments to Proposed Rulemaking for Control of Nitrogen Oxide (NOx) Emissions from Glass Melting Furnaces (39 Pa Bulletin 5318)

Dear Ms. Mahinske:

The PQ Corporation ("PQ") appreciates the opportunity to submit the following comments to the Pennsylvania Department of Environmental Protection's (the "Department") proposed rulemaking entitled Control of Nitrogen Oxide (NOx) Emissions from Glass Melting Furnaces, published at 39 Pa Bulletin 5318 (Sept. 12, 2009):

1. Section 129.308(b)(1) of the proposed rule requires "the highest valid 1-hour emission value that occurred during the reporting quarter" to be substituted for missing or invalid continuous emissions monitoring ("CEMS") data. PQ believes this data substitution procedure is inherently unreasonable and punitive to the regulated community. Furthermore, PQ believes that data substitution is no longer necessary, because the Department has moved away from a mass-based ozone season limit to a year-round 30-day rolling average limit. Pursuant to page 49 of the Department's Continuous Source Monitoring Manual (dated December 2, 2006), data substitution is necessary for "emissions standards based on total mass, tons per year, etc." The proposed 30-day rolling average limit is not such a mass-based limit. Therefore, PQ believes a data substitution procedure is not required or appropriate for this rulemaking.

To the extent the Department determines that data substitution is required in this rulemaking, PQ suggests an alternative data substitution option be included, whereby a facility could seek Department approval to substitute data that is more representative of the actual emissions that occurred during the period of invalid or missing data. Such an alternative data substitution option is already recognized in the Department's Continuous Source Monitoring Manual (see page 50). Furthermore, a Department-approved alternative data substitution option is available to cement manufacturers in 25 Pa Code § 145.143(c). A similar alternative option should be afforded to glass melting furnaces to the extent the Department retains data substitution in the final rulemaking.

2. Section 129.305(b) of the proposed rule indicates a plan approval application must be submitted for a "furnace rebuild" in order to obtain the start-up exemption. "Furnace rebuild" is defined as "[a] COLD REPAIR THAT is commenced after the end of a furnace campaign period or expected life cycle of a furnace." "Rebricking" is defined as "THE COLD

REPLACEMENT OF DAMAGED OR WORN REFRACTORY PARTS OF THE GLASS MELTING FURNACE." PQ is concerned that the definition of "furnace rebuild" includes "rebricking" activities. Plan approvals have not been historically required for furnace rebricking, because these activities are routine maintenance and repair. PQ requests that the Department revise the definition of "furnace rebuild" such that it is clear that a plan approval application is not required for rebricking activities, or alternatively, the Department should incorporate the previous language referring to "complete reconstruction" into the definition of "furnace rebuild."

3. Sections 129.309(a) and 129.308(c) of the proposed rule requires quarterly reporting to the Department. This reporting requirement is inconsistent with the existing Title V semi-annual and annual reporting requirements, and creates a duplicative and burdensome additional reporting obligation on the regulated community. PQ believes the existing semi-annual and annual reporting requirements under Title V are adequate for the Department to assess compliance with this rulemaking. Accordingly, PQ suggests references to the quarterly reporting requirement be deleted in the final rulemaking.
4. Section 129.303(b) of the proposed rulemaking indicates the exemption for startup, shutdown, and idling only applies if the facility notifies the Department in writing at least 24 hours prior to initiating such an event. PQ believes there are circumstances where an unforeseeable equipment problem requires a facility to immediately go into an unanticipated idling position. In such circumstances, PQ does not believe that it is reasonable to require a facility to provide 24 hour advance written notice to the Department in order to qualify for the exemption, assuming all other requirements in the proposed rulemaking are satisfied. Therefore, PQ suggests that the Department add a qualifier to section 129.303(b) that when a facility is required to move to the idling position due to an unforeseeable equipment problem, written notice may be provided to the Department up to 24 hours after the occurrence of the event that necessitated the idling and still qualify for the exemption. PQ believes that affording facilities the latitude to provide written notice up to 24 hours after the occurrence of such an event does not result in an additional environmental impact, because the facility remains bound to comply with the other requirements in the proposed rulemaking with respect to minimizing emissions.

PQ appreciates the Department's careful consideration of the above comments to address significant concerns regarding the proposed rulemaking.

Regards,



Edward Hines
Plant Manager
PQ Corp., Chester, PA facility

cc: Elaine Simpson, V.P. of EHS