



BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	
NITROGEN OXIDES EMISSIONS FROM)	R08-19
VARIOUS SOURCE CATEGORIES:)	(Rulemaking – Air)
AMENDMENTS TO 35 ILL. ADM. CODE)	
PARTS 211 AND 217)	

POST-HEARING COMMENTS OF SAINT-GOBAIN CONTAINERS, INC.

Saint-Gobain Containers, Inc. (“SGCI”) respectfully submits the following post-hearing comments in the above rulemaking proceeding (these comments supplement those filed on February 14, 2008):

SGCI owns and operates glass melting furnaces at its facility in Dolton, Illinois. With respect to the 5.0 lbs/ton emission limit in proposed Section 217.204, SGCI believes that a narrow exception should be made to the May 1, 2010 compliance date for entities that enter into an enforceable agreement with IEPA to install control technology that can achieve NO_x emission rates significantly below the 5.0 lbs/ton limit pursuant to an enforceable schedule extending beyond 2010. SGCI is currently in the process of negotiating such an agreement with IEPA. SGCI suggests the following addition to the Exemption provision in proposed Section 217.202:

Notwithstanding the compliance date set forth in Sections 217.155(b) and 217.204, a compliance date of December 31, 2014 shall apply when the owner or operator of a container glass melting furnace subject to Subpart F has executed a binding and enforceable agreement by December 31, 2009 with the State of Illinois that requires compliance with a NO_x limit that is less than 30 percent of the emission limit in Section 217.204.

Without a relief mechanism in these narrow circumstances, SGCI would effectively be required to implement a much less effective control device, when substantially greater reductions from the installation of alternative NO_x control technology are currently being discussed with the State of Illinois. SGCI cannot afford to install the technology required to meet an interim limit of 5.0 lb/ton for the period between the compliance date under Section 217.204 and the anticipated schedule for installation of the alternative technology at the end of 2014, and thus the opportunity for substantially greater long-term emission reductions may be lost if a limited exemption from the May 1, 2010 compliance date is not adopted. Additionally, the Dolton facility has three furnaces, with two exhaust stacks on each furnace. Early installation of CEMS would require six devices (rather than as few as one CEMs which may be

required for alternative technology), and would serve no compliance purpose. We therefore urge the deletion of a requirement to install CEMS until the alternative technology is installed. Thank you for the opportunity to comment on this important rulemaking.

Respectfully submitted,



Steven B. Smith
V.P. Environmental Health & Safety
Saint-Gobain Containers, Inc
1509 S. Macedonia Avenue
Muncie, In 47307

Dated: November 25, 2008

cc: S. Segebarth, Esq.