



January 20, 2009

Mr. John Therriault
Assistant Clerk of the Board
1021 North Grand Avenue East
P.O. Box 19274
Springfield, IL 62794-9274

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 |) | |

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

Saint-Gobain Containers, Inc. (“SGCI”) respectfully submits the following pre-hearing comments in the above rulemaking proceeding (these comments supplement those filed on February 14, and November 25, 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 respectfully suggests the following changes;

Section 211.2625 Glass Melting Furnace

“Glass melting furnace” means, for purposes of Part 217, a unit comprising a refractory vessel in which raw materials are charged and melted at high temperature to produce molten glass.

Section 211.157.b)4) Testing and Monitoring

Add a sentence at the end, “If compliance with NO_x limitations is demonstrated by CEMS as required by Section 217.b)1), this paragraph does not apply.”

Section 217.152.d) Compliance Date

Notwithstanding subsections (a), (b), and (c) of this Section, compliance with the requirements of Subpart F of this Part by an owner or operator of an emission unit subject to Subpart F of this Part shall be extended until December 31, 2014, if such units are required to meet emissions limitations for NO_x, as measured using a continuous emissions monitoring system, and included within a legally enforceable order on or before December 31, 2009, whereby such emissions limitations are less than 30 percent of the emissions limitations set forth under Section 217.204 of Subpart F of this Part.

Section 217.202 Exceptions

Add a sentence: Section 217.204 shall not apply during glass furnace startup (not to exceed 70 days) or idling (operation at less than 35% of furnace capacity). During such periods the furnace shall meet a lb/day NO_x limit calculated as:

$$\text{NO}_x \text{ lb/day limit} = (5.0 \text{ lb/ton NO}_x) \times (\text{MFDC})$$

Where: NO_x lb/day limit = the NO_x pound per day limit
5.0 lb/ton NO_x = NO_x Emission Limitation (lb/ton glass
produced) from Section 217.204
MFDC = Maximum furnace daily capacity in tons"

Consistent with our letters to the Illinois Pollution Control Board, we have been and continue to work through these issues to develop mutually agreeable language.

Respectfully submitted,



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

cc: S. Segebarth, Esq.