



VIA E-MAIL AND OVERNIGHT MAIL

May 30, 2006

Mr. J. Wick Havens, Chief
Division of Air Resource Management
Bureau of Air Quality
Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street, 12th Floor
Harrisburg, PA 17105-8468

RE: COMMENTS ON OZONE TRANSPORT COMMISSION'S PROPOSED CONTROL MEASURES

Dear Mr. Havens:

The North American Insulation Manufacturers Association ("NAIMA") appreciates the opportunity to submit comments on the Pennsylvania Department of Environmental Protection's ("DEP") "Various Ozone Transport Region Measures Under Consideration by the Ozone Transport Commission and Mid-Atlantic/Northeast Visibility Union." NAIMA is the association of North American manufacturers of fiber glass insulation products and represents the entire fiber glass insulation manufacturing industry in the United States. In addition to providing information to government agencies and conducting technical research, NAIMA promotes energy efficiency and environmental preservation through the use of its insulation products. NAIMA's fiber glass manufacturing members are: CertainTeed Corporation; Evanite Fiber Corporation; Guardian Building Products; Johns Manville, Knauf Insulation; and Owens Corning.

NAIMA's members have manufacturing facilities in some of the states comprising the Ozone Transport Commission ("OTC") and have plants located specifically in Pennsylvania. Therefore, NAIMA's members have a keen interest in the OTC's proposed control measures since the OTC specifically identifies and recommends control measures for fiber glass furnaces.

NAIMA, on behalf of the glass manufacturing industry, requested a 120-day extension of time in which to file comments on this matter. In a telephone conversation with J. Wick Havens, NAIMA was informed that a 120-day extension of time would be impractical at this juncture, but Mr. Havens assured NAIMA that it would have ample opportunity to submit comments and provide information during the regulatory process.

Based on this assurance, NAIMA provides general comments today with the intention of submitting detailed and substantive comments at a later date. NAIMA's future submission will offer important information and data that the OTC apparently did not have at the time it formulated its proposal for fiber glass furnaces. This offer is particularly significant since the

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OTC has glass furnaces listed as a Category 2 on OTC's scale of recommendation, which means that OTC acknowledges that more information is needed.

Specifically, NAIMA and its members intend to submit corrected data and technical comments. NAIMA's preliminary review of the data that OTC relied upon to make its recommendation for fiber glass furnaces caused serious concerns about the accuracy and completeness of OTC's data. For example, NAIMA's initial review suggests that some facilities identified by the OTC are no longer operating. Other facilities have already installed oxy-gas melting or are using other NOx reduction technologies. Similarly, much of the emissions data relied upon by OTC is outdated even though more recent data is available. In reviewing OTC's incomplete data, NAIMA has determined that information relevant to the OTC's efforts is available and the industry is willing to share it with the OTC.

NAIMA and its members, in the interest of accuracy and sound policy decisions, notify the OTC that relevant and pertinent data exists that the Commission should find useful in formulating its final recommendations for fiber glass furnaces, and that NAIMA intends to supply this additional information and data to the OTC at a later date.

Sincerely,

Angus E. Crane

Angus E. Crane
Vice President, General Counsel

cc: Mr. Christopher Recchia
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