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June 2, 2006

Mr. J. Wick Havens  
Chief, Division of Air Resource Management  
Bureau of Air Quality  
P.O. Box 8468  
Harrisburg, PA 17105-8468

Subject: PQ Corporation Comments  
Proposed OTC Control Measures for Glass Furnaces

Dear Mr. Havens:

As requested in the April 29, 2006 Pennsylvania Bulletin, PQ Corporation is submitting the following comments regarding the proposed ozone transport region measures under consideration for glass manufacturing furnaces by the Ozone Transport Commission.

First, PQ Corporation is a leading producer of silicate, zeolite, and other performance materials serving the detergent, pulp and paper, chemical, petroleum, catalyst and water treatment markets. The company operates a sodium and potassium silicate manufacturing site in Chester, Pennsylvania. At this site, various ratios of sand and either sodium carbonate or potassium carbonate are combined together in furnaces to produce sodium or potassium silicates. These products are inorganic chemicals and the Chester facility is classified under SIC Code 2819 (Industrial Inorganic Chemicals).

PQ Corporation's Chester facility was included in the inventory of glass furnaces used for the OTC modeling and is noted as a Container Glass Melting Furnace in Glass Manufacturing service. (Noted as Plant ID 510-1665 on Data Source: MANEVU 2002 Inventory and 2009/2012/2018 Projected Inventories.) PQ Corporation and its Chester facility only operate furnaces in sodium/potassium silicate manufacturing service and are not part of the container glass, fiberglass or plate glass manufacturing industries.

Although a new source performance standard (NSPS) has been established for glass manufacturing plants [40 CFR Part 60, Subpart CC and COMAR 26.11.01.01C(29)], this standard does not apply to furnaces used in the production of sodium or potassium silicate (SIC 2819). It does apply to the manufacturing of glass products defined as container glass (SIC 3221), pressed and blown glass (SIC 3229), wool fiberglass (SIC 3296) and flat glass (SIC 3211) [40 CFR 60.291 and 60.292]. The definition of glass

manufacturing plants being considered by the Ozone Transport Commission should not differ from the definition being used for NSPS applicability.

Based on the above information, PQ Corporation and its Chester facility should not be included in the Glass/Fiberglass Furnaces Category and should be removed from the inventory of glass furnaces used for OTC Modeling. As with NSPS, the measures being contemplated by the Ozone Transport Commission for Glass/Fiberglass Furnaces and subsequently acted upon by the State of Pennsylvania should not apply to the sodium/potassium furnaces that PQ Corporation operates.

We appreciate the opportunity to comment on the ozone transport region measures currently under consideration by the Ozone Transport Commission and Pennsylvania. If you require additional information or have questions, I may be reached at 610-651-4720.

Sincerely,

Elaine Simpson  
Vice President,  
Health, Safety and Environment

Cc: Mr. Terry L. Black  
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