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November 26, 2008

The Honorable Stephen L. Johnson  
Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

RE: EPA-Docket-HQ-OAR-2008-0318

Dear Administrator Johnson:

I am writing to convey the view of the members of the Glass Association of North America (GANA) that the Clean Air Act (CAA) should not be used to achieve reductions in domestic emissions of greenhouse gas (GHGs). Founded in 1994, GANA is the leading glass manufacturing and commercial glazing industry trade association in North America.

As manufacturers that comply with the CAA, GANA members are especially concerned that the EPA's proposal could trigger requirements for pre-construction permits, such as Prevention of Significant Deterioration (PSD), when manufacturers attempt to expand facilities, including for the installation of more energy efficient technologies. Similarly, the proposal could cause carbon emissions to be included within Title V operating permits, which would add considerably to existing compliance requirements while achieving no measureable environmental benefits. Most importantly, the mandatory actions triggered by invoking the CAA would yield no environmental benefit absent a global agreement to curb GHG emissions.

During a time when we are attempting to jump-start the U.S. economy, mandating pre-construction and operating permits as tools to regulate carbon will not only further undermine the nation's economy, but it will also pose a barrier to or disincentive for technological innovation. Innovation holds the key to solving our nation's environmental challenges.

GANA urges the EPA to avoid use of the Clean Air Act as a means of regulating carbon. The EPA should instead encourage cooperation with federal lawmakers and other elected officials to achieve environmental goals in an efficient and effective manner.

Regards,

William M. Yanek  
GANA Executive Vice President