



September 10, 2015

Mr. David Matouesk
IDEM – Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204

By email submission: dmatouse@idem.IN.gov

**Re: Comments of the Glass Packaging Institute (GPI) on Pending Permits
SSM 097-35573-00123 and SPM 097-35639-00123**

Dear Mr. Matouesk:

On behalf of the Glass Packaging Institute (GPI), the North American trade association for the glass container manufacturing industry, **we are providing the following comments in opposition to the Covanta Indianapolis, Inc. pending permit application (SSM 097-35573-00123 and SPM 097-35639-00123) to construct a mixed-waste processing facility (MWPF) in Indianapolis.** As outlined, this facility would feed into an existing waste-to-energy (WTE) facility.

To be clear, the GPI and its member companies are not opposed to the broader utilization and operations of waste-to-energy (WTE) facilities as a source of energy and power. Our opposition is focused on the application to have a new mixed waste processing facility constructed, which will directly feed residential recyclables into the WTE facility, with no consideration for glass recycling, as explained below.

The GPI is the North American trade association for the glass container manufacturers, glass recyclers, and suppliers of materials, equipment and transport to the industry.

The Indiana glass container industry is among the strongest in the country. Our member companies operate a glass container recycling plant within Indianapolis city limits, as well as several glass container manufacturing and glass recycling facilities located around the state, employing over 2,000 residents with good paying jobs and benefits.

There are no plans for the proposed MWPF facility to attempt to recover the recycled glass to be received. As glass is a 100% and endlessly recyclable product (meaning glass bottles can be remelted to make new glass bottles

infinitely), this is extremely disappointing and a waste of valuable natural resources.

When glass plants can increase the level of recycled glass as part of the overall batch mix, they can reduce furnace temperatures, resulting in reduced energy use and lower greenhouse gas emissions.

One ton of carbon dioxide is eliminated for every six tons of recycled container glass used in the manufacturing process. Energy use at glass plants also drops about 2-3% for every 10% recycled glass used in the manufacturing process. This results in cleaner air for Indiana.

Nationally, glass container manufacturing companies purchase roughly 2.4 million tons of recycled glass each year. There are four glass container manufacturing plants in-state that benefit from purchasing and re-melting recycled glass. **Recycled glass, as a key ingredient of the glass container manufacturing process, is a clearly demonstrated need by the industry.**

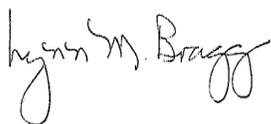
The glass container industry and its recycling suppliers continue to work on sorting, contamination and other issues related to traditional materials recovery facility (MRF) capabilities. The addition of solid waste, organics and other materials to the planned MWPF would make this task even more challenging and difficult, as recyclable materials will be even more difficult to extract.

The proposed facility also runs counter to the state's enactment of House Bill 1183 establishing a goal of 50% recycling for municipal solid waste, as glass and many other types of recyclables processed through the MRF will be lost to increased contamination and incineration.

We want to thank the IDEM in advance for your thoughtful review of our comments to the pending Covanta permit applications. We would appreciate the opportunity for an additional public hearing for stakeholder input on the proposal.

Please do not hesitate to contact me with any follow-up questions. I can be reached directly at 703-684-6359, lbragg@gpi.org.

Sincerely,



Lynn M. Bragg
President
Glass Packaging Institute