



Oregon

Kate Brown, Governor

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October 27, 2020

Jack King
Owens-Brockway Glass Container Inc.
Plant Manager
9710 NE Glass Plant Rd
Portland, OR 97220-1383

Sent via EMAIL

Re: Round 2 Regional Haze Program, Four Factor Analysis
Owens-Brockway, Title V 26-1865

Dear Jack King,

Thank you for submitting the Four Factor Analysis dated June 12, 2020 in response to DEQ's December 23, 2019 request for additional information on the four-factor analysis for your facility for Round 2 of the Regional Haze Program.

EPA's Regional Haze Rule (40 CFR 51.308) was enacted as part of the Clean Air Act on July 1, 1999. The goal of the federal Regional Haze program is to improve visibility conditions in Class I Areas back to natural conditions by 2064. Regional Haze is a program that sets long-term goals for visibility improvement and requires states to conduct additional review approximately every 10 years from 2004 through to 2064, with interim checks on visibility conditions about every 5 years, in between the ten-year reviews (the next state review after 2021 is actually in 2028).

The letter DEQ sent to Owens-Brockway regarding four factor analysis on December 23, 2019, is part of Oregon's adopted requirements for Round 2 of the Regional Haze program under OAR chapter 340, division 200, and detailed in 40 CFR 51.308(f), for the period from 2021 to 2028. DEQ used the 2017 PSELs to screen permitted facilities for applicability to conduct four factor analyses for the 2018-2028 time period. DEQ requested the four-factor analysis under OAR 340-214-0110.

DEQ concurs with your findings that combined control of NOx, SO2 and PM by catalytic ceramic filters (CCF) is cost-feasible for glass-melting furnaces A & D at your Portland facility. CCF will meet Regional Haze goals and also reduce risks from toxic air contaminants currently being assessed through Cleaner Air Oregon (CAO). The facility's air toxics risk assessment remains underway, and DEQ will continue to work with Owens to complete the risk assessment to reflect the facility's current configuration. We look forward to discussing an installation schedule with you to ensure implementation of both Regional Haze and CAO program goals.

DEQ's estimated reductions from the current PSEL Level to be approximately the following:

Emission Unit(s)	Control Device	Glass production (tons/yr)	Target Pollutant(s)	PSEL for target pollutant(s) (tons/yr)	control efficiency	tons of pollutant reduced
A-Furnace	CCF	86,458	NOx	203	90%	183
			PM10	30	99%	30
			SO2	91	90%	82
			multiple	324		294
D-Furnace	CCF	66,562	NOx	123	90%	111
			PM10	20	99%	20
			SO2	70	90%	63
			multiple	213		194

The estimated final PSELs would then be:

Closest CIA - Mount Hood Wilderness, d = 55.1 km

	Actual Emissions (2017)	2017 PSEL	Current PSEL*	PSELs With CCF @ Furnaces A & D
NOx	403.65	711	382	88
PM10	76.5	132	109	59
SO2	118.07	313	184	39
Q	598	1156	675	186
Q/d	10.86	21	12.25	3.38

* Pulled from AQ Permits Online 10/2/20 (last updated 8/3/20)

DEQ appreciates your commitment to protecting air quality and improving visibility in Oregon's National Park and Wilderness Areas. If you have any questions about the content of this letter or need technical assistance, please contact D Pei Wu, PhD, at wu.d@deq.state.or.us or 503-229-5269.

Sincerely,



Ali Mirzakhilili

Administrator, Air Quality Division

Cc: Karen Williams
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 Steve Dietrich
 Kenzie Billings
 Keith Johnson
 David Smith, Owens-Brockway