



# Oregon

Kate Brown, Governor

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March 10, 2022

Owens-Brockway Glass Container, Inc.  
c/o John Browning, P.E.  
Bridgewater Group  
7100 SW Hampton Street  
Commerce Plaza Suite 235  
Tigard, OR 97223

Mr. Browning,

DEQ received the submittal of the Cleaner Air Oregon (CAO) Level 4 Risk Assessment (Risk Assessment) and supporting spreadsheets dated January 5, 2022 for Owens-Brockway Plant 21 in Portland, OR and has completed our final review.

DEQ approves the Risk Assessment and concludes that it is complete and satisfies the CAO requirements for performing a risk assessment pursuant to OAR 340-245-0050(1) with the following comments:

## 1. Risk Assessment

- a. Residential produce dose equation in the multipathway adjustment factor (MPAF): For the 2 to <16 age group, use Table 7.11 (page 7-16) of the Office of Environmental Health Hazard Assessment's (OEHHA's) Technical Support Document for Exposure Assessment and Stochastic Analysis, FINAL, August, 2012 (Exposure Assessment Guidance) for the 75<sup>th</sup> percentile produce consumption values for the 2 to <16 age group instead of using the values for the 16 to <30 age group:

- a. Exposed = 7.3 g/kg-day
- b. Leafy = 2.3 g/kg-day
- c. Protected = 4.9 g/kg-day
- d. Root = 3.9 g/kg-day

DEQ acknowledges that HARP currently uses the same values for the 2 to <16 and 16 to <30 age groups. DEQ raised this issue of repeated values in HARP with OEHHA technical staff in January 2022 and confirmed that this is likely an error in HARP. DEQ made changes in the attached MPAF and Risk spreadsheets that are detailed in the Appendix. These changes do not result in a material change in the outcome of the Risk Assessment, but do change some risk values.

- b. Nonresidential soil ingestion dose equation in the MPAF: There are aspects of the nonresidential soil ingestion dose equation presented that DEQ will likely address in a future rulemaking, but DEQ is not requiring revisions to this Risk Assessment. Contemplated changes to the soil ingestion equation would not impact the outcome of the Risk Assessment.

Considering the revisions discussed above and spreadsheet changes detailed in Appendix A, final rounded risk values are shown in Table 1 below:

**Table 1. Summary of Risk Assessment Results**

Risk Type	Facility Risk	Risk Assessment Results
Cancer Risk – excess cancer risk per million		
Residential (e.g. homes near facility)	10	Facility Risk exceeds the source permit Risk Action Level <sup>1</sup> of 5
Non-Residential Child (e.g. school near facility)	<0.1	
Non-Residential Worker (e.g. office near facility)	1	
Noncancer Risk – Hazard Index		
Annual Exposure-Residential (e.g. home)	0.5	Facility Risk is not above the community engagement Risk Action Level of 1
Annual Exposure-Non-Residential Child (e.g. school)	<0.1	
Annual Non-Residential Worker (e.g. office)	0.1	
24-Hour Exposure (acute)	1	Facility Risk is at the Risk Action Level limit of 1

If you agree with DEQ’s proposed changes, please provide a memorandum stating whether or not you concur with DEQ’s revisions, along with your AQ501 Cleaner Air Oregon Permit Application Form and applicable fee (DEQ would not apply a Document Modification Fee). These updates, in conjunction with the final submitted Risk Assessment would constitute the completed, approved Risk Assessment.

DEQ has determined that your facility exceeds the Source Permit Level in OAR 340-245-8010 Table 1 and requires a Toxics Air Contaminant Permit Addendum (TACPA) to limit TAC emissions from this facility.

The next step in the CAO process is to complete and submit the AQ501 Cleaner Air Oregon Permit Application Form, the \$34,600 *Level 4 Risk Assessment – not de minimis* activity fee, and supporting memorandum. The completed AQ501 Form, applicable fee, and memorandum are due no later than **April 9, 2022**.

Please contact Kenzie Billings directly at 503.866.8741 or [kenzie.billings@deq.oregon.gov](mailto:kenzie.billings@deq.oregon.gov) with any questions.

<sup>1</sup> DEQ requires risk reduction if risk is above these Risk Action Levels

Sincerely,

Kenzie Billings  
Air Toxics Project Manager

Appendices: Appendix A: DEQ Changes to MPAF Spreadsheet and Risk Spreadsheet  
Appendix B: DEQRevisions2.24.22\_CAO\_OB\_2022\_01\_05.xlsm  
Appendix C: DEQRevisions2.24.2022\_HARP\_CALC\_2022\_01\_05.xlsx

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Matt Davis, DEQ  
George Yun, DEQ  
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## **Appendix A: DEQ Changes to MPAF Spreadsheet and Risk Spreadsheet**

### **Changes to MPAF Spreadsheet**

This spreadsheet is named “DEQRevisions2.24.2022\_HARP\_CALC\_2022\_01\_05.” DEQ revisions are in blue text highlighted in green on the “HI Calcs\_Mod” Tab and are summarized below:

1. Formatting note: DEQ added a formatting note to cell I2.
2. DEQ made the following changes to residential produce dose:
  - a. Cell AC101: revised from 2.6 to 7.3
  - b. Cell AC102: revised from 1.3 to 2.3
  - c. Cell AC103: revised from 2.1 to 4.9
  - d. Cell AC104: revised from 2.2 to 3.9
  - e. Removed the note in rows 96-97, columns AB-AD

### **Changes to Risk Spreadsheet**

This spreadsheet is named “DEQRevisions2.18.22\_CAO\_OB\_2022\_01\_05.” DEQ revisions are in blue text highlighted in green on the “EL-MP” tab and are summarized below:

1. Formatting note: DEQ added a formatting note to cell A1
2. Cell Q16: revised from 7.1 to 8.0 (exact value was copied from MPAF spreadsheet – cell D16 on “HI Calcs\_Mod” Tab)