

**From:** [BILLINGS Kenzie](#)  
**To:** ["Dennis Buenger"](#)  
**Cc:** [GISKA JR](#)  
**Subject:** RE: [EXTERNAL] RE: CAO revisions: Owens-Brockway  
**Date:** Tuesday, January 19, 2021 9:36:41 AM

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Thank you Dennis, we will be in touch soon.

Best,

Kenzie Billings, P.E.  
Air Toxics Project Manager  
Oregon Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232  
Pronouns: she, her, hers

Phone: 503-229-5247

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**From:** Dennis Buenger <Dennis.Buenger@o-i.com>  
**Sent:** Monday, January 18, 2021 12:19 PM  
**To:** BILLINGS Kenzie <Kenzie.BILLINGS@state.or.us>  
**Cc:** GISKA JR <JR.GISKA@state.or.us>  
**Subject:** RE: [EXTERNAL] RE: CAO revisions: Owens-Brockway

Kenzie –

Attached are the three files related to our proposed CAO HRA modeling. As a matter of explanation, the following updates have been performed with respect to your December 16th email:

1. The air toxics emission inventory included here is the version you had returned to me. We are in agreement with the changes you have made.
2. The risk assessment Work Plan is the same as we had submitted in November. ERM did not see any changes needed.
3. The attached modeling protocol contains the updated information as requested in your email.

Let me know if you have any questions.

Sincerely,  
Dennis J. Buenger  
(419) 450-6114

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**From:** BILLINGS Kenzie <[Kenzie.BILLINGS@state.or.us](mailto:Kenzie.BILLINGS@state.or.us)>  
**Sent:** Wednesday, January 13, 2021 2:11 PM  
**To:** Dennis Buenger <[Dennis.Buenger@o-i.com](mailto:Dennis.Buenger@o-i.com)>  
**Cc:** GISKA JR <[JR.GISKA@state.or.us](mailto:JR.GISKA@state.or.us)>  
**Subject:** RE: [EXTERNAL] RE: CAO revisions: Owens-Brockway

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Thank you for letting me know, Dennis. We look forward to receiving the revisions.

Best,

Kenzie Billings, P.E.  
Air Toxics Project Manager  
Oregon Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232  
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**From:** Dennis Buenger <[Dennis.Buenger@o-i.com](mailto:Dennis.Buenger@o-i.com)>  
**Sent:** Wednesday, January 13, 2021 11:00 AM  
**To:** BILLINGS Kenzie <[Kenzie.BILLINGS@state.or.us](mailto:Kenzie.BILLINGS@state.or.us)>  
**Cc:** GISKA JR <[JR.GISKA@state.or.us](mailto:JR.GISKA@state.or.us)>  
**Subject:** RE: [EXTERNAL] RE: CAO revisions: Owens-Brockway

Kenzie –

We are working on the issues you raised. If ERM is able, we are hoping to get you the response this week. I will keep you posted.

Sincerely,  
Dennis J. Buenger

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**From:** BILLINGS Kenzie <[Kenzie.BILLINGS@state.or.us](mailto:Kenzie.BILLINGS@state.or.us)>  
**Sent:** Monday, January 04, 2021 1:49 PM  
**To:** Dennis Buenger <[Dennis.Buenger@o-i.com](mailto:Dennis.Buenger@o-i.com)>  
**Cc:** GISKA JR <[JR.GISKA@state.or.us](mailto:JR.GISKA@state.or.us)>  
**Subject:** [EXTERNAL] RE: CAO revisions: Owens-Brockway

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Good morning Dennis,

I wanted to check in to see if you have any questions or would like to talk over any of the items in my December email – please let me know if I can clarify anything for you and your team.

Best regards,

Kenzie Billings, P.E.  
Air Toxics Project Manager  
Oregon Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
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**From:** BILLINGS Kenzie  
**Sent:** Wednesday, December 16, 2020 11:14 AM  
**To:** 'Dennis Buenger' <[Dennis.Buenger@o-i.com](mailto:Dennis.Buenger@o-i.com)>  
**Cc:** GISKA JR <[JR.Giska@deq.state.or.us](mailto:JR.Giska@deq.state.or.us)>  
**Subject:** CAO revisions: Owens-Brockway

Dennis,

Thank you for submitting the revised Emissions Inventory and Risk Assessment Work Plan for Owens-Brockway's Portland facility last month. There are just a few things we need to finish before we begin next steps.

I've added some contextual information for clarity's sake to the attached Emissions Inventory for Owens-Brockway. Please review and let me know if you approve of these clarifications. Additions include:

1. Fugitive IDs for EU6 and EU1 previously not identified in tab 2. These IDs should not impact your Modeling Protocol or Risk Assessment Work Plan.
2. TEU ID for each TAC quantified in tab 3.
3. TEU ID and Emission Unit or Activity Description for each TAC quantified in tab 4.
4. TEU ID and Material Name for each TAC quantified in tab 5.

During our review of the revised Emissions Inventory and Risk Assessment Work Plan, it became apparent that emission rates summarized in the Risk Assessment Work Plan and Modeling Protocol need to be revised to reflect the updated Emissions Inventory. Please revise the following tables, and resubmit the revised Modeling Protocol and Risk Assessment Work Plan in full with the revised information:

- Modeling Protocol:

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- Appendix E, Annual Emission Rates
- Appendix E, Daily Emission Rates
- Risk Assessment Work Plan:
  - Table 2-1
  - Appendix C, Annual and Acute Emission Rates (g/s) of Each TAC by TEU – 2018 Inventory

Final approved versions of all documents will be posted to the facility webpage on DEQ's website. Thanks again for all your team's work on these documents. We look forward to receiving revised submittals as soon as possible.

Best regards,

Kenzie Billings, P.E.  
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