



Oregon

Kate Brown, Governor

Department of Environmental Quality
Agency Headquarters
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5696
FAX (503) 229-6124
TTY 711

December 6, 2021

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

Re: Owens-Brockway Glass Container, Inc. Level 4 Risk Assessment Cleaner Air Oregon Submittals

Mr. Browning,

DEQ received the submittal of the Cleaner Air Oregon (CAO) Toxic Air Contaminant Emissions Inventory (Inventory), Modeling Protocol and Level 4 Risk Assessment Work Plan (Work Plan), and Level 4 Risk Assessment (Risk Assessment) submitted on your behalf for Owens-Brockway Plant 21 in Portland, OR on September 20, 2021. The proposed approach to assessing risk substantially changes assumptions pertaining to dispersion modeling, soil relative bioavailability (RBA) and ingestion rates of contaminated media.

We have completed our review of all three documents. In accordance with Oregon Administrative Rule (OAR) 340-245-0030(2), DEQ has determined that the following additional information and corrections are required by January 5, 2021 in order to approve the Inventory, Work Plan, and Risk Assessment:

1. Modeling Protocol:

- a. Survey the height of the large vent on top of Building B1 and the height of Stack D as required in DEQ's November 5, 2021 letter (Attachment 1). Revise the stack and building height parameters as needed after completing the survey.

2. Work Plan and Risk Assessment: Please refer to the attached Toxicology Related Proposals document (Attachment 2) for additional information regarding the items discussed below.

- a. Soil Relative Bioavailability: Owens-Brockway proposed to change the RBA value for arsenic in soil from 100% to 44%. DEQ will accept an RBA of 60% for arsenic in soil.
- b. Produce Ingestion Rates: Owens-Brockway proposed to change produce ingestion rates from California Office of Environmental Health Hazard Assessment's (OEHHA's) 95th percentile to the mean by age group. DEQ will accept OEHHA's 75th percentile by age group.
- c. Homegrown Produce Ingestion Rates: Owens-Brockway proposed to change the fraction of food intake that is home-produced from 13.7% to 5.95%. DEQ will accept the original fraction (13.7%).
- d. Soil Ingestion Rates: Owens-Brockway proposed to change the soil ingestion rates from OEHHA's weight adjusted soil ingestion rates to the soil ingestion rates and body weights used in OHA's Public Health Assessment for Bullseye Glass Co. and mean weight adjusted soil ingestion rate from OEHHA for the third trimester. In order for DEQ

to accept the proposed changes for the 0 to 70 age groups, Owens-Brockway must provide the supporting math that shows the conversion of OHA's ingestion rates and body weights for different age groups to weight adjusted soil ingestion rates for age groups compatible with California's Hot Spots Analysis and Reporting Program. DEQ does not accept the inclusion of a soil ingestion rate for the third trimester age group in order to stay consistent with the original multi-pathway adjustment factor calculations for noncancer health effects.

- e. DEQ requests that Owens-Brockway clearly demonstrate how final risk numbers are impacted by each variable's Level 4-adjusted value compared to the CAO default value. This should appear in the uncertainty section of your Risk Assessment. Please see Table 2 of Attachment 2 for reference.

DEQ is requesting that you submit this additional information to complete your Inventory, Work Plan, and Risk Assessment. If you think that any of that information is confidential, trade secret or otherwise exempt from disclosure, in whole or in part, you must comply with the requirements in OAR 340-214-0130 to identify this information. This includes clearly marking each page of the writing with a request for exemption from disclosure and stating the specific statutory provision under which you claim exemption. Emissions data is not exempt from disclosure.

DEQ is available to discuss the information request with you and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines above may result in a violation of OAR 340-245-0030(1).

If you have any questions regarding this letter please contact me directly at 503-866-8741 or kenzie.billings@deq.state.or.us, and I look forward to your continued assistance with this process.

Sincerely,

Kenzie Billings
Air Toxics Project Manager

Attachment 1: November 5, 2021 DEQ Letter
Attachment 2: CAO Modeling Protocol and Level 4 Risk Assessment Work Plan Toxicology Related Proposals

Cc: Keith Johnson, DEQ
J.R. Giska, DEQ
Ali Mirzakhali, DEQ
Matt Davis, DEQ
George Yun, DEQ
Gabriela Goldfarb, OHA
Dennis Buenger, Owens-Brockway
Geoff Tichenor, Stoel Rives
File