

BILLINGS Kenzie

From: Dennis Buenger <Dennis.Buenger@o-i.com>
Sent: Friday, March 6, 2020 2:35 PM
To: BILLINGS Kenzie
Cc: Jim Dill
Subject: Basis for requesting an extension

Kenzie –

You have requested justification for our request to extend the March 23rd deadline for our response on the three documents. The following points should meet that need.

1. The scope of questions regarding the emission inventory covers almost every area of the emission inventory submitted, so it takes significant time to review all of those areas and determine what changes are necessary to determine the most accurate emissions assessment.
2. Many of the emission inventory questions have not been asked before and require either getting information from the facility or researching through our historical files. One example of this is specifying individual units in “Miscellaneous Fuel Burning NG”.
3. The extent of detail in the emission inventory questions clearly indicate that adequate time and effort is considered important by DEQ.
4. A significant number of the items under Modeling Protocol require more than just modeling information, but also detailed information from the facility.
5. Additional time is needed to accurately identify the location of all the emission sources in the inventory, as well as those you have asked about.

It certainly is the intention of Owens-Brockway Glass Container Inc. and ERM to thoroughly answer all of your questions. At this point in time, the March 23rd deadline would only allow us to submit a partial response, which would not allow us to properly and accurately answer your questions. Neither would it give you the data needed to proceed with CAO requirements for the facility.

We ask that you grant us an extension to the March 23rd deadline. Let me know if you have any questions.

Sincerely,

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