

BILLINGS Kenzie

From: Dennis Buenger <Dennis.Buenger@o-i.com>
Sent: Monday, March 30, 2020 12:32 PM
To: BILLINGS Kenzie
Cc: PUSKAS Becka
Subject: Owens-Brockway Glass Container Inc.

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Billings:

Owens-Brockway Glass Container Inc. ("Owens") is planning to resume production on Furnace D at our Portland Plant in the near future. This is new information since our call on March 25th.

Due to customer requirements, Owens would like to resume production as soon as possible. However, pursuant to your letter dated February 6, 2020, Owens must perform a source test no later than 30 days after restarting Furnace D. (As discussed, Furnace D is not shut down - it is in a "hot hold" condition where it contains molten glass, but the furnace is not producing glass. It is Owens' understanding that ODEQ interprets "restarting" in this Order to mean the date on which Furnace D resumes producing glass containers.) Also, a source test protocol must be submitted at least 30 days prior to a source test. Owens plans to have the protocol submitted very soon, and Owens will try to schedule the source testing as soon as possible after this 30-day window ends. However, given scheduling issues with the source testing company it may be 45 -60 days or more from now before Furnace D source testing can be scheduled. Since Owens is prohibited from resuming operations more than 29 days prior to source testing, this condition effectively means that Owens cannot resume glass production for some time.

Owens produces containers for the food and beverage industry, which is considered an industry critical to the economy during this period when the country, and indeed the world, is battling the COVID-19 pandemic. Owens respectfully requests that the 30-day period specified in your letter of February 6, Section I, requiring performance of source testing after Furnace D production resumes be extended to 60 days. This would allow Owens to resume production at Furnace D as soon as possible, to meet demand in this time of national emergency, while still performing source testing within a reasonable period of time. Owens appreciates your timely consideration of this request.

If you have any questions or comments, please call me at 419-450-6114.

Sincerely,

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