



Oregon

Kate Brown, Governor

Department of Environmental Quality
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May 1, 2020

Dennis J. Buenger, CHMM
Global Environmental Technical Leader
Owens-Brockway Glass Container Inc.
9710 NE Glass Plant Rd.
Portland, OR 97220

Re: Request for an Extension, Furnace D Source Testing, Owens-Brockway Glass Container Inc.

Mr. Buenger,

On February 6, 2020, The Oregon Department of Environmental Quality (DEQ) notified Owens-Brockway Glass Container Inc. (Owens-Brockway) that the facility was required to source test Furnace D within 30 days of starting up Furnace D while producing amber glass. DEQ received written notification from you on March 30, 2020, requesting an extension to complete source testing on Furnace D no later than 60 days after resuming glass container production in Furnace D.

Owens cited the following justifications for requesting an extension:

- Due to customer demand, Owens would like to resume production in Furnace D as soon as possible. Owens produces containers for the food and beverage industry, which is considered an industry critical to the economy during the COVID-19 pandemic.
- Due to 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.

On April 3, DEQ met with Owens-Brockway (Owens) to clarify source testing requirements for Cleaner Air Oregon (CAO): DEQ seeks to understand emissions occurring during amber glass production in Furnace D. Owens-Brockway indicated that upon restarting Furnace D, green glass would be produced for the foreseeable future with no anticipated amber glass production start date.

DEQ met again with Owens-Brockway on April 21 to discuss source testing options to ensure that all permitted production conditions are reflected in Owens-Brockway's emissions inventory and risk assessment. Based on our discussion, DEQ approves Owens-Brockway's extension request with the conditions outlined below:

1. Revise the Actual, Requested Potential to Emit (PTE), and Capacity activity levels in the Emissions Inventory for Furnace D to reflect the conditions described below. DEQ grants Owens-Brockway an additional week to revise the emissions inventory to reflect these changes. Your revised emissions inventory is due May 15, 2020.
 - a. Remove 'Furnace D (all glass)' activity levels from the emissions inventory.
 - b. Include separate projected amber glass production levels and projected green glass production levels. Include both daily and annual activity levels, and be aware these levels will be used to establish permit conditions for emissions from this Furnace.

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- c. Use the recent May 2019 source testing data collected from Furnace A during amber glass production to develop emission factors for amber glass production in Furnace D to complete the CAO risk assessment.
2. Within 30 days of restarting amber glass production in Furnace D, Owens-Brockway must source test according to the source testing requirements cited in DEQ's February 6, 2020 letter.

Please contact me directly at (503.229.5247, billings.kenzie@deq.state.or.us). We look forward to your continued assistance with this process.

Sincerely,

Kenzie Billings
DEQ CAO Project Manager

Cc: Keith Johnson, DEQ
J.R. Giska, DEQ
Steve Dietrich, DEQ
George Yun, DEQ
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