



Oregon

Kate Brown, Governor

Department of Environmental Quality
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July 23, 2020

Andrew Stewart
Owens-Brockway Glass Container
9710 NE Glass Plant Rd.
Portland, OR 97220

Mr. Stewart,

We have reviewed the revised source test plan submitted by Owens-Brockway Glass Container (Owens) on July 21, 2020 as required by the Cleaner Air Oregon (CAO) process. Based on our review the source test plan is approved with the following comments.

General Comments

DEQ approves the requested method deviations to use quartz probes and nozzles instead of Teflon and the use of NaOH as the reagent instead of KOH for the Method SW-846 0061 testing. The source test report should include an evaluation of the impact of this deviation on the test data.

All further modifications and/or alternatives to testing methods or procedures that are implemented to satisfy DEQ testing requirements must receive approval from DEQ prior to their use in the field. Changes not acknowledged by the DEQ could be the basis for invalidating an entire test run and potentially the entire testing program.

The source test plan includes testing for SO₂, NO_x and Particulate Matter. Testing for those pollutants was not required by the February 6, 2020 letter requiring test on Furnace D while producing amber glass. DEQ has reviewed and approves the additional testing.

The source test plan was required to be submitted 30 days before conducting the source test. Source testing is scheduled for August 18-19, 2020. DEQ received the initial, incomplete test plan on July 20 that did not include sampling for all of the required air toxics. A revised test plan with the correct list of air toxics was submitted on July 21, 2020.

DEQ appreciates the continued assistance with this process. The results will provide valuable information that will help us better understand emissions from the facility, and allow for completing the CAO emissions inventory. If you have any questions or concerns please contact me directly. Thank you for your continued efforts with this process.

Sincerely,

Thomas Rhodes

Thomas Rhodes
DEQ CAO Source Test Coordinator

Cc: Dennis Buenger, Owens-Brockway Glass Container
Keith Johnson, DEQ
Kenzie Billings, DEQ

26-1876 Owens-Brockway Glass Container

Steve Dietrich, DEQ
George Yun, DEQ