

Department of Environmental Quality
Agency Headquarters

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March 16, 2020

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

Re: Request for an Extension, Cleaner Air Oregon Response, Owens-Brockway Glass Container Inc.

Mr. Buenger,

The Oregon Department of Environmental Quality (DEQ) received written notification from you on March 6, 2020, requesting additional time for the submittal of revisions to the emissions inventory, modeling protocol, and level 3 risk assessment work plan (submittals) for the Owens-Brockway Glass Container Inc. (Owens) facility in Portland, Oregon. The revised submittals were initially due March 23, 2020 as stated in DEQ's February 6, 2020 response (DEQ's response) to the August submittals. Owens requests that the due date be extended to May 8, 2020.

Owens cited the following justifications for requesting an extension:

- 1. Owens requires significant time to review and respond to DEQ's response. Additional time is necessary to review all areas discussed in DEQ's response and to determine what changes are necessary to develop the most accurate emissions inventory possible.
- 2. Many of the clarifications requested in DEQ's response have not been posed to the facility before and require the facility to either gather new information from the facility or research historical files.
- 3. DEQ's response requested extensive detail in revised submittals, which indicates that DEQ considers adequate time and effort important.
- 4. Several items in Section IV, Modeling Protocol, of DEQ's response pertain to modeling information and detailed facility information.
- 5. Owens requires additional time to accurately identify the location of all emission sources in the emissions inventory, as well as those units and processes identified in DEQ's response.

DEQ approves of this extension request with the following condition: Owens shall coordinate a bimonthly (once every two weeks) conference call with DEQ to ensure that questions and clarifications are resolved prior to the May 8, 2020 submittal due date. These conference calls shall start no later than March 25, 2020.

DEQ understands that significant resources are required to revise the documents as was stated in our February 6, 2020 letter. DEQ approves of this request for an extension with the presumption that Owens will communicate any questions or clarifications regarding the above comments proactively in order to

provide timely and complete submittals. DEQ is available to coordinate with Owens to review any portion of this extension request as well as sections of the emissions inventory, modeling protocol, and level 3 risk assessment work plan to facilitate this process. Your revised submittals are due May 8, 2020.

Please contact me directly at (503.229.5247, <u>billings.kenzie@deq.state.or.us</u>). 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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