



Sent electronically

April 27, 2021

Mr. Ali Mirzakhali  
Administrator, ODEQ Air Quality Programs  
700 NE Multnomah Street, Suite 600  
Portland, Oregon 97232

Mr. Mirzakhali,

In response to your letter dated April 22, 2021, Owens-Brockway Glass Container Inc. ("Owens") is providing ODEQ with updated information that impacts the proposed CAO Risk Assessment analysis for our Portland Plant. Owens has recently made the decision to shut down Furnace A operations indefinitely; Owens will be preparing the necessary paperwork to remove Furnace A and its related emission units from our facility's Title V permit.

Indefinite cessation of Furnace A will have a significant impact on the emissions profile and lowered risk level of our facility. With Furnace A shut down indefinitely, there is no purpose for a risk assessment to include Furnace A emissions. Owens proposes to prepare a risk assessment that only includes Furnace D and remaining emission units as outlined in the Air Toxics Emission Inventory, the Modeling Protocol, and the Risk Assessment Work Plan. Owens expects that it will be necessary to revise these documents to proceed with this change in scope.

Your letter included a due date of May 7, 2021 (i.e., 15 days) for the Risk Assessment. We understand ODEQ's sense of urgency relayed to us during our April 20th call; however, as we must now revise the documents listed above and obtain approval from ODEQ for our revised risk assessment protocol, we cannot meet this extremely accelerated requested timeline. Owens proposes to submit the formal risk assessment within 45 days after ODEQ's approval of the revised protocol.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis J. Buenger".

Dennis J. Buenger  
Global Environmental Technical Leader

Cc: Nina DeConcini  
Matt Hoffman  
Kenzie Billings