



Oregon

Kate Brown, Governor

Department of Environmental Quality
Agency Headquarters
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5696
FAX (503) 229-6124
TTY 711

May 10, 2021

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

Mr. Buenger,

The Department of Environmental Quality (DEQ) received your letter dated April 27, 2021 sent on behalf of the Owens-Brockway Glass Container Inc. (Owens) facility in Portland, Oregon. DEQ appreciates the clarity this letter provided regarding Owens's current and future operations plans for Furnace A.

As discussed in our phone call on May 3, DEQ understands that Owens will need time to update their previously approved CAO submittals with these changes. DEQ requests that Owens and its consultant continue to collaborate actively with DEQ so that these revisions and the risk assessment can be completed quickly and accurately. DEQ's understanding of the revisions required to these documents includes the items listed below:

Emissions Inventory:

1. Maintain *Furnace A* and *Furnace A natural gas* activity levels, emission factors, and emissions estimates for the 2018 calendar year as is required under OAR 340-245-0040(3)(a)(B)(i).
2. Revise Requested Potential to Emit activity levels to zero on *Tab 2. Emissions Units & Activities* of the Emissions Inventory spreadsheet and related emissions calculations on *Tab 3. Pollutant Emissions - EF*.

Modeling Protocol:

1. Remove references to *Furnace A* from Sections 2.2 and 3.5 of the Modeling Protocol.
2. Remove *Furnace A* references from Tables 3-6 and 3-7.
3. Remove *Furnace A* daily and annual emission rates from Appendix E. Revise footnote (b) of Appendix E to reference the most recent Emissions Inventory.

Risk Assessment Work Plan: Remove *Furnace A* emission rates from Appendix C.

Based on a review of needed updates, DEQ's understanding is that the revisions listed above should not take substantial additional time to prepare the revised submittals and complete the assessment. To date, DEQ has not been asked to participate in any substantive discussions with Owens's consultant regarding this work. We again encourage you to collaborate with DEQ to expedite the submittal of the revised CAO Emissions Inventory, Modeling Protocol, and Risk Assessment Work Plan with your Level 3 Risk Assessment. DEQ is prepared to meet with Owens and its consultant to discuss preparation of these documents at any time, please contact me with your team's availability.

In order to allow time for these additional changes, DEQ will now expect final documents for review and approval on or before May 21st (2 additional weeks from the original due date of Friday May 7th).

Please contact me directly at 971.246.3554, keith.johnson@deq.state.or.us if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Keith Johnson". The signature is written in a cursive style with a long horizontal stroke at the end.

Keith Johnson
Manager, DEQ Cleaner Air Oregon Program

Cc: Ali Mirzakhali, DEQ
Nina DeConcini, DEQ
Matt Hoffman, DEQ
Kenzie Billings, DEQ