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August 3, 2021

**Keith Johnson**

Manager, Cleaner Air Oregon Program  
Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232-4100

via email: [Keith.Johnson@state.or.us](mailto:Keith.Johnson@state.or.us)

**Subject:** Owens-Brockway Glass Container, Inc., Request for Extension of Time to Submit Cleaner Air Oregon Information

Dear Mr. Johnson:

On behalf of Owens-Brockway Glass Container, Inc. ("Owens-Brockway"), Bridgewater Group requests an extension of time in which to submit the Cleaner Air Oregon ("CAO") risk assessment and supporting documentation to DEQ concerning Owens-Brockway's Portland plant. Specifically, we request until September 20, 2021 to submit the following CAO information for DEQ's review:

- an updated emissions inventory, reflecting Owens-Brockway's decision to permanently cease operation of Furnace A and its July 28, 2021 application to remove Furnace A from the plant's Title V Operating Permit;
- an updated modeling protocol, also reflecting the plant's decision to cease operating Furnace A as well as recently verified information about the plant (e.g., stack parameters, building heights); and
- most significantly, a Level 4 Risk Assessment work plan and Level 4 Risk Assessment.

An extension is authorized by OAR 340-245-0030(3):

- this request is timely made no fewer than 15 days prior to the current submittal deadline of August 19, 2021;
- Owens-Brockway has made progress in completing these submittals; and
- the 30-day extension is necessary because, at Bridgewater Group's recommendation, Owens-Brockway is in the process of enhancing its Level 3 to a Level 4 assessment, including an analysis of the toxicity, default exposure assumptions, and relative bioavailability of air contaminants emitted by Furnace D, particularly arsenic. As the Oregon Health Authority has recently affirmed, a more thorough toxicity assessment for arsenic is necessary because arsenic's toxicity is significantly affected (and potentially limited) by factors considered under a Level 4 assessment.

With Bridgewater's assistance, Owens-Brockway is committed to completing a CAO risk assessment that is as complete and accurate as possible. Accordingly, consistent with the time frames established in OAR 340-245-0030 (which provide deadlines for Level 4 Risk Assessment submittals that are 30 days after Level 3 Risk

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Assessments are due), we request until September 20, 2021 to submit the CAO documentation identified herein.

Thank you for considering this request, and please contact me directly with any questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads "John Browning". The signature is written in a cursive style with a small number "1" above the letter "i" in "Browning".

John Browning

cc: Matt Hoffman, DEQ  
Becka Puskas, DEQ  
John Cayton, Owens-Brockway  
Geoff Tichenor, Stoel Rives LLP