DEQ Public Hearing

Owens-Brockway
Title-V Operating Permit

Zoom Meeting | April 4, 2024

State of Oregon
DEQ Department of Environmental Quality

Using Zoom Meeting

- Hear the audio either through your computer or by calling in by phone with the phone number provided upon registration.
- Note that you will not be able to speak unless the host enables your audio and then you unmute.

Asking a Question

- You should see the following along the bottom of your screen.

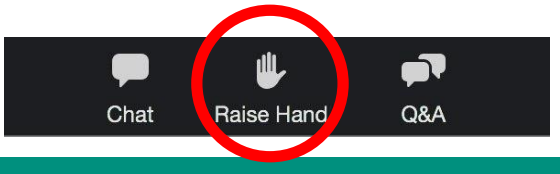
- To ask a question: type it into the Q&A or raise your hand and the host will un-mute you. (*9 if you're on the phone)
- Use chat if you're having technical difficulties.

Michael:
We'll be answering questions at the end of the presentation but feel free to submit them at any time. You can do that using the toolbar at the bottom of your screen.

You can type a question into the Chat or Q&A. If you'd like to say your question aloud, please raise your hand and I will un-mute you. If you're on your phone, press *9 to raise your hand and I will un-mute you.

Making a Comment

- During the public hearing portion of the meeting, raise your hand to comment
- We'll call folks in the order their hand was raised
- Remember *9 if you're listening by phone
- State and spell your first and last name



Purpose of Today's Meeting

Why are we here

- Provide information about the air quality permit
- Answer questions
- Receive verbal public comment

As always, please speak for yourself and be respectful of others.

Public Comment Period

- Open now through Wednesday, April 10 at 5 p.m.
- Go to Owens-Brockway web page: ordeq.org/owens-brockway-project
- Draft permit: https://www.oregon.gov/deq/get-involved/documents/041024OBrockwayGC.pdf
- Verbal and written comments given equal weight

Air Quality Permit

Weston Li, Permit Writer

State of Oregon
DEQ Department of Environmental Quality

Hi I am Weston Li, with DEQ Northwest Region. I am the current permit writer for this permit.

Owens-Brockway

Owens Brockway is located at the Northwest corner of Interstate 205 and Columbia Blvd. It's a glass manufacturing plant producing a variety of glass bottles and jars.

Emissions History

- The plant built in 1956 with 4 glass melting furnaces
- Title V Permit Program, effective September 1993
- June 2020, Only 1 furnace operating (without Control)
- June 2024, Furnace D with Catalytic Ceramic Filter (CCF) Control

Pollutant:	PM (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	Combined (tons/yr)
Original TV Permit	132	313	711	1,156
Current Permit	109	184	382	675
Proposed Permit	55	108	137	300
After CCF (est.)	24	39	64	127

- The original Title V permit was issued in November 1997.
- The permit was renewed in 2002 and 2007.
- The current permit was issued (renewed) in December 2019.
- The allowed emissions have been decreasing.

What is this Permit for?

Current Permits and Orders:

- Existing Title-V Permit 26-1876-TV-01, Reopened to address EPA Order
- Mutual Agreement and Final Order AQ/V-NWR-2020-208
- Construction Air Contaminant Discharge Permit 26-1876-CS-01
- Stipulated Agreement and Final Order (Regional Haze)

1. Reopen the permit to address EPA's Petition Order: a). to have sufficient monitoring, recordkeeping and reporting requirements to ensure compliance with the PM and opacity limits NSPS Subpart CC (Filterable PM limit of 0.2 lbs/ton (Claim A)) and the SIP (Total PM limit of 0.10 gr/dscf).
2. MAO (Mutual Agreement and Final Order AQ/V-NWR-2020-208) executed in October 2021 aimed to bring to compliance with PM and Opacity limits.
3. Construction Air Contaminant Discharge Permit 26-1876-CS-01 was issued to install the catalytic ceramic filter system.
4. In addition, regional haze (Stipulated Agreement and Final Order) was issued in August 2019 to decrease the emissions of pollutants PM, NOx and SO2.

Title V permit Contents

- Reduced PSELs
- National Ambient Air Quality Standards
- Cleaner Air Oregon permit conditions
- Regional Haze Requirements
- Interim Opacity Limit (until CCF complete)
- New NSPS PM Standard (after CCF)
- 95% Filterable PM Reduction (after CCF)
- Testing, Monitoring, Compliance Determination

1. The proposed permit reduced the emissions by requiring lower plant site emissions limits than the current permit.
2. Complied with National Ambient Air Quality Standards (NAAQS) for NOx (one-hour NO_2) and SO2 (one-hour SO_2) and PM (24-hour $PM_{2.5}$) standards by requiring production limits on hourly, daily and annual bases.
3. Incorporated in the permit Cleaner Air Oregon risk Limits to ensure public health is not compromised. Owens-Brockway conducted a Level 4 Risk Assessment shows that source permit limits are required to manage risk from facility activities based on the facility's current operations. The facility may need to update their risk assessment once pollution controls are installed at the facility.
4. As mentioned previously, the Regional Haze Limits and requirements of Stipulated Agreement and Final Order executed on August 9, 2021 was included in the proposed permit.
5. As required by the MAO, an interim opacity limit of 8.5% (as a surrogate indicator for complying with PM limit 0.1 gr/dscf) is included in the permit until CCF control is installed.
6. The permit includes new NSPS PM emission standard and removal efficiency requirements for the CCF system.
7. All related testing, monitoring and compliance determination.

Permit Conditions

Current Existing Standards:

- (NSPS Filterable PM Limit of 0.5 gr/kg)
- 0.10 grains per standard cubic feet
- 20% opacity limit
- NESHAP 6S standards of 0.02 lbs HAPs/ton glass

NEW REGULATORY EMISSIONS STANDARDS

- NSPS Filterable PM Limit of 0.1 gr/kg
- Reduce Filterable PM emissions by at least 95%

Main existing PM/HAP emission limits and new limits. After the CCF is operational, only the NSPS PM limit is changed and a new PM control efficiency is imposed.

CCF Construction Schedule

Installation of Catalytic Ceramic Filter pollution control system by June 30, 2024

- **Feb. 2023:** execute a contract to purchase the pollution controls - **COMPLETED**
- **Sep. 2023:** complete construction drawings - **COMPLETED**
- **Jan. 2024:** begin on-site construction at the facility - **STARTED**
- **Jun. 2024:** complete the installation of the pollution controls

As required by the MAO order and the construction permit, Owens Brockway must comply with the CCF construction schedule. The schedule is also included in the proposed Title V permit.

However, once the CCF control system is installed, this proposed permit must be finalized so that Owens Brockway can operate the CCF control. Only this permit can authorize the operation of the control system.

What will the pollution controls do

The CCF pollution control system will reduce

- Particulate Matter (PM) and metal HAPs
- Nitrogen oxides (NO_X)
- Sulfur Dioxide (SO_2)

Pollutant	Existing PSEL (tons/yr)	PSEL after CCF, est. (tons/yr)
PM	109	24
NO_X	382	64
SO_2	184	39

As mentioned previously this proposed permit will reduce the emissions by large amounts due to the use of the CCF control system. The main pollutants that will be controlled are PM, NOx and SO2. Metal HAPs are PM too and will be controlled as well.

How to monitor the pollution controls

The following operating parameters of the CCF pollution control system will be monitored:

Parameter	Range
Inlet Temperature	≥ 500 °F
Pressure Drop	1 ~ 18 inches of water
Sorbent Injection Rate	Minimum rates determined by performance tests
Ammonia Injection Rate	

To ensure compliance with PM, NO and SO2 limits, the permit requires parametric monitoring, such exhaust inlet temperature, pressure drop across the control house, sorbent injection rate and ammonia injection rate.

The minimum sorbent and ammonia injection rates will be determined during the performance tests. The testing is required within 90 days of operating the controls.

PM -> Inlet temp and pressure drop;
Sorbent injection -> SO2; and
Ammonia injection -> NOx.

Questions?

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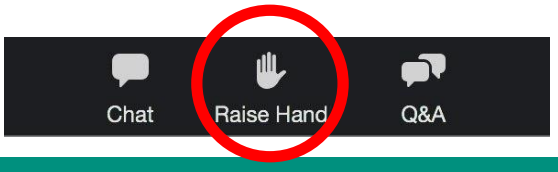

3 minutes for a comment

Submit comments

- **By email:** nwraqpermits@deq.oregon.gov
- **By mail:** Oregon DEQ, Northwest Region Air Quality Permit Coordinator, 700 NE Multnomah St., Ste. 600, Portland, OR 97232
- **More information:** ordeq.org/owens-brockway-project
- **For questions:** Weston.Li@deq.oregon.gov

Submit all comments by 5 p.m. on Wednesday, April 10

What's next

DEQ will consider and respond to all comments received.

DEQ may modify the proposed permit based on comments.

If a facility meets all legal requirements, DEQ will issue the facility's air quality permit, along with a written response to comments.

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Thank you!

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