

**Evaluation Report, Amended February 2002**  
**Owens-Brockway Glass Container, Plant #30**  
**Application Number 6869/6876**

**Background**

Owens-Brockway Glass Container (OB) is proposing to correct the emission trains, to add new replacement abatement devices at its facility located in Oakland, and to change the monitoring requirements within its Title V permit for several sources.

The Title V permit lists Sources S-43, S-44, S-48, S-50, S-52 and S-56 as being abated by A-2. However, these sources were never abated by A-2 and the district databank is in agreement. Previously un-permitted dust collectors abate these Sources S-48, S-50, S-52, S-56, and S-58. The data forms for these dust collectors were not submitted with the original application. See the Recommendation section of this evaluation report for the corrected emissions trains for these sources.

A-2 has been removed. A-2 previously abated S-41 and S-42. Both of these sources (S-41 and S-42) have new abatement devices (A-41 and A-42).

S-43 and S-44 are not controlled by baghouses. They will have no monitoring requirements since these sources vent within the building, any particulate emissions from these sources would be fugitive, and the sources have low emissions (2.1 and 8.3 lb particulate/day, respectively). The facility has not had any compliance problems relating to fugitive emissions.

The District source test section and a source testing company hired by OB determined that testing was not feasible at many sources (S-39, S-57, S-75, S-76, S-77, S-79, S-80, S-81, S-83, S-84, and S-97.) The forming machines do not have a stack or any distinct emissions point to measure the emissions. The particulate emissions from the forming machines are entirely fugitive. Some of the sources that do have distinct emission points would require significant and costly improvements in order to be tested. These significant and costly improvements are not warranted since the point sources are located within the building and the facility has not had a problem with fugitive particulate emissions. The source testing requirement and related permit conditions for these sources will be removed from the Title V permit. Again, these sources emissions all vent within the building and are not expected to create any fugitive visible emission problem from the windows and doors of the facility.

This application originally included changing the descriptions of the Forming Machines (S-75 to S-77, S-79, S-80, S-83, and S-84) but the information required to complete the data form G's was not readily available so OB requested that the description change be removed from the application. OB is aware that changing the descriptions of the Forming Machines will require the submittal of a new application.

For reasons mentioned above, condition #'s 15855, 16591, and 16592 will have source testing requirements for the above- mentioned sources removed. The proposed reductions in monitoring within this application are considered to be significant revisions to the Title V permit and will require a public notice and a comment period.

Condition #16591 was also corrected to require annual inspections for A-41, A-42, A-48, A-50, A-58, A-520, A-521, A-522, A-560, A-561, A-562, and A-563. Previously condition #16591 mistakenly referred to A-1, which is already covered by Condition #8395.

**Emission Calculations**

No emission increases are expected as a result of this application.

**Plant Cumulative Increase**

Emissions are not expected to increase as a result of this application.

### **Toxic Risk Screening Analysis**

A risk analysis was not required for this application since the emissions are not expected to increase.

### **Statement of Compliance**

Sources S-39, S-57, S-75 to S-77, S-79 to S-81, S-83, and S-84 will continue to comply with Regulation 6, sections 301, 305, 310, and 311, since these sources vent within the building and are not expected to have any fugitive visible emissions from the facilities windows or doors.

Sources S-41, S-42, S-48, S-50, S-52, S-56, and S-58 will continue to comply with Regulation 6, sections 301, 305, 310, and 311, since these sources are abated by dust collectors/baghouses. All of these sources as well as S-43 and S-44 will continue to vent within the building. The facility does not have a history of fugitive particulate emissions from the building.

This application will continue to comply with Regulation 2, Rule 6.

This application will not trigger BACT since facility emissions will not increase as a result of this application.

This application will not require offsets since the facility's emissions will not increase as a result of this application.

The project is categorically exempt from CEQA under Regulation 2-1-312.6, which exempts applications exclusively for repair, maintenance or minor alteration of existing facilities, equipment or sources involving negligible or no expansion of use beyond that previously existing.

This project is not within 1000 feet from the nearest school and is therefore not subject to the public notification requirements of Reg.2-2-412.

A risk analysis was not required for this application since the toxic emissions did not exceed the respective toxic trigger levels.

NSPS, NESHAPS, and PSD do not apply to this application.

### **Recommendation**

Recommend that a Change of Conditions be granted for:

- S-39 Raw Material Unloading Station**
- S-41 Batch Mixer abated by A-41 Dust Collector Torit 64 PJD 8**
- S-42 Batch Mixer abated by A-42 Dust Collector Torit 64 PJD 8**
- S-43 Cullet Crusher**
- S-44 Sand Elevator**
- S-48 Lime Storage Bins abated by A-48 Dust Collector (B1) FlexKleen 36-BVS-9-IT-G, 230 scfm**

- S-50 Soda Ash Storage Bins abated by A-50 Dust Collector (B3) FlexKleen 36-BVS-9-IT-G, 230 scfm**
- S-52 Sand Storage Bins (4) abated by A-520 Dust Collector (B4) FlexKleen 36-BVS-9-IT-G, 230 scfm, A-521 Dust Collector (B4F) FlexKleen 36-BVS-9-IT-G, 230 scfm, A-522 Dust Collector (B5C) FlexKleen 36-BVS-9-IT-G, 230 scfm, set up in parallel**
- S-56 Cullet Storage Bins (7) abated by A-560 Dust Collector (B6) FlexKleen 36-BVS-9-IT-G, 230 scfm, A-561 Dust Collector (B6F) FlexKleen 36-BVS-9-IT-G, 230 scfm, A-562 Dust Collector (B7) FlexKleen 36-BVS-9-IT-G, 230 scfm, A-563 Dust Collector (B9) FlexKleen 36-BVS-9-IT-G, 230 scfm, set up in parallel**
- S-57 Ecology Cullet Elevator**
- S-58 Salt Cake Storage Area abated by A-58 Dust Collector (B2) FlexKleen 36-BVS-9-IT-G, 230 scfm**
- S-75 Forming Machine**
- S-76 Forming Machine**
- S-77 Forming Machine**
- S-79 Forming Machine**
- S-80 Forming Machine**
- S-81 Forming Machine**
- S-83 Forming Machine**
- S-84 Forming Machine**
- S-97 Baler abated by A-3 Corrugated Cyclone**

**Conditions**

See condition #'s 15855, 16591, and 16592. (Attached in proposed Title V permit)

by \_\_\_\_\_ date \_\_\_\_\_  
Gregory Solomon  
Air Quality Engineer II