

March 15, 2004

Mr. Deborah Jordan
Director, Air Management Division
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Jordan:

ALAMEDA COUNTY
Roberta Cooper
Scott Haggerty
(Chairperson)
Nate Miley
Shelia Young

The District has completed the evaluation of the following application for a Significant Revision to a Major Facility Review Permit:

Facility #	Facility Name	Application #
A0030	Owens-Brockway Glass Container Inc.	6869/6876

CONTRA COSTA COUNTY
Mark DeSaulnier
Mark Ross
Gayle Uilkema
(Secretary)

The purpose of this revision is to correct the abatement trains and remove source testing requirements for several sources.

Also, the standard portions of the permit have also been updated and corrected, as follows:

MARIN COUNTY
Harold C. Brown, Jr.

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
Willie Brown, Jr.
Chris Daly
Jake McGoldrick

SAN MATEO COUNTY
Jerry Hill
Marland Townsend
(Vice-Chairperson)

SANTA CLARA COUNTY
Liz Kniss
Patrick Kwok
Julia Miller
Dena Mossar

SOLANO COUNTY
John F. Silva

SONOMA COUNTY
Tim Smith
Pamela Torliatt

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

- The dates in Section I.A.1 were updated.
- Section I.A.11, which requires the responsible official to certify all documents submitted, was added to conform to changes in Regulation 2, Rule 6.
- Section I.E.1 requiring the permit holder to provide any information, records, and reports requested or specified by the APCO, was added because it was omitted in error.
- Section I.H was modified to conform to the current standard.
- The Abatement device table, II-B, has been modified so that there is no confusion between the citation of standards and the standards themselves.
- Sections III, IV, and XI have been modified because SIP standards are now found on EPA's website and are not included as part of the permit.
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos, was added to Section III. This standard is equivalent to BAAQMD Regulation 11, Rule 2, which has been cited in the permit since it was issued in 2000. Therefore, this is not a substantive change.
- The standard language in the Section IX, Permit Shield, was updated.
- The glossary was updated.

The following additional corrections were made:

- The description of the BAAQMD 6-301 limit in BAAQMD Condition 15855, part 2 has been corrected to say "for no more than three minutes in any hour."
- The description of the BAAQMD 6-301 limit in Section VII has been corrected to say "for < 3 min/hr."
- BAAQMD 6-310 and 6-311 were deleted from the Section IV and VII tables for S39, S57, S75-S77, S79-S81, S83, and S84, because these standards apply only to sources that have stacks.

- The term "TSP" in Section VII has been changed to "FP", which means "filterable particulate.
- Condition #16591 part 4 has been amended to include the correct list of abatement devices and remove A-1 since it is already contained in Condition #8395.

This letter and the permit evaluation for Applications 6869 and 6876 form the statement of basis for this revision.

The District has made a preliminary decision to issue the Significant Revision to the Major Facility Review, but the final decision on the permit issuance will consider public and EPA comments on this preliminary decision. The notice inviting written public comments will be published in the Oakland Tribune. The final date for comments is April 19, 2004.

Enclosed for your information is a copy of the proposed permit and evaluation. If you have any questions regarding this project, please call Steve A Hill, Manager, Permit Evaluation, at (415) 749-4673.

Sincerely yours,

Jack P. Broadbent
Executive Officer / APCO

Enclosures
SAH:myl

H:\pub_data\tilev\permit\significant\propose\A0030sig-revision.doc