

Owens-Brockway Glass Container Inc.
2901 Fruitland Ave
Vernon, CA 90058
323-586-4200
www.o-i.com

May 23, 2016

Los Angeles Regional Water Quality Control Board
Attn. Ms. Rosario Aston
320 West 4th St., Suite 200
Los Angeles, CA 90013

Submitted via email: Rosario.Aston@waterboards.ca.gov and losangeles@waterboards.ca.gov

**Re: Owens-Brockway Glass Container Inc. – Vernon Facility (NPDES No. CA 0056464, CI 6079)
Comments on Tentative Time Schedule Order (TSO) No. R4-2016-YYYY**

Dear Ms. Aston:

Owens-Brockway Glass Container Inc. ("Owens") appreciates the Los Angeles Regional Water Quality Control Board staff for issuing the Tentative Time Schedule Order ("TSO") on May 3, 2016. Upon review, Owens is submitting the following comments on the Tentative TSO:

- 1. Reconsideration of Selenium Interim Limit at EFF-001:** The Tentative TSO grants an interim limit for selenium at EFF-001 of 42 ug/L based on the maximum effluent concentration ("MEC"). As recent sample data from March 7, 2016 shows that selenium was 49 ug/L, Owens requests that this March 7, 2016 sample event be considered the MEC and the interim effluent limit be raised to 49 ug/L at EFF-001. These results have been submitted to the Board; however the laboratory report showing this selenium result is included in Attachment A for your reference.
- 2. Correction to Footnote 2 of Table 2:** Footnote 2 to Table 2 of the Tentative TSO references using the MEC to establish interim effluent limits between 2010 and 2016. However, this footnote is incorrectly applied to selenium at EFF-001, as the interim limit for selenium is being derived from the MEC between September 2015 – March 2016. Please add a new footnote for selenium to reference the correct time period.
- 3. Correction to Footnote 6 of Table 2:** Footnote 6 to Table 2 of the Tentative TSO references "an outlier of 170 [ug/L] for bis(2-ethylhexyl)phthalate". This reference is incorrect as the MEC at EFF-002 for bis(2-ethylhexyl)phthalate is 5.1 ug/L, which was on 1/24/2013. Please update or remove the reference to this outlier as appropriate.

If helpful, Owens is willing to have a conference call to discuss any of the above comments in advance of the June 2nd comment deadline. If you have any questions, please call me at 323-586-4288 or Doug Pittman, Assistant Plant Manager, at 323-586-4275.

Sincerely,

Rodney Detmer, Plant Manager
Owens-Brockway Glass Container Inc.

CERTIFICATE OF ANALYSIS

Client: Owens-Brockway Glass Container 2901 Fruitland Avenue Vernon CA, 90058	Report Date: 03/28/16 15:53
Attention: Anita Luitel	Received Date: 03/07/16 10:30
Phone: (323) 586-4207	Turn Around: Normal
Fax: (323) 586-4216	Client Project: Storm Water NPDES - EFF-001, EFF-002
Work Order(s): 6C07013	

NELAC #4047-002 ORELAP ELAP#1132 NEVADA #CA211 HAWAII LACSD #10143

The results in this report apply to the samples analyzed in accordance with the Chain of Custody document. Weck Laboratories, Inc. certifies that the test results meet all NELAC requirements unless noted in the case narrative. This analytical report is confidential and is only intended for the use of Weck Laboratories, Inc. and its client. This report contains the Chain of Custody document, which is an integral part of it, and can only be reproduced in full with the authorization of Weck Laboratories, Inc.

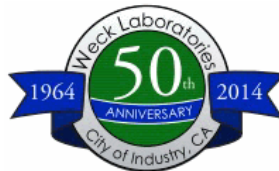
Dear Anita Luitel :

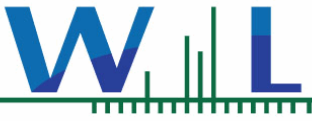
Enclosed are the results of analyses for samples received 03/07/16 10:30 with the Chain of Custody document. The samples were received in good condition, at 3.4 °C and on ice. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Case Narrative:

Reviewed by:

Kim G. Tu
Project Manager





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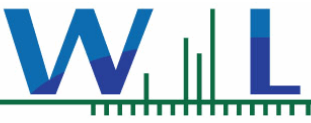
Date Received: 03/07/16 10:30
Date Reported: 03/28/16 15:53

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Sampled by:	Lab ID	Matrix	Date Sampled
EFF-001 (Fruitland Ave)	Anita Luitel	6C07013-01	Water	03/07/16 07:35

ANALYSES

- Acid and Base/Neutral Extractables by EPA Method 625
- Anions by IC, EPA Method 300.0
- Conventional Chemistry/Physical Parameters by APHA/EPA/ASTM Methods
- Field Determinations
- Hexavalent Chromium by IC
- Metals by EPA 200 Series Methods
- Microbiological Parameters by Standard Methods
- Subcontracted Analyses
- Volatile Organics by EPA Method 624



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6C07013-01 EFF-001 (Fruitland Ave)

Sampled: 03/07/16 07:35

Sampled By: Anita Luitel

Matrix: Water

Anions by IC, EPA Method 300.0

Method: EPA 300.0	Batch: W6C0333	Prepared: 03/07/16 10:45					Analyst: atl
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Chloride, Total	4.8	0.10	0.50	mg/l	1	03/07/16 13:15	
Fluoride, Total	0.079	0.020	0.10	mg/l	1	03/07/16 13:15	J
Nitrate as N	360	20	110	ug/l	1	03/07/16 13:15	
Nitrite as N	ND	20	150	ug/l	1	03/07/16 13:15	
NO2+NO3 as N	0.38	0.020	0.11	mg/l	1	03/07/16 13:15	
Sulfate as SO4	8.6	0.10	0.50	mg/l	1	03/07/16 13:15	

Conventional Chemistry/Physical Parameters by APHA/EPA/ASTM Methods

Method: EPA 1664A	Batch: W6C0320	Prepared: 03/07/16 11:38					Analyst: cam
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Oil & Grease (HEM)	4.3	1.3	5.0	mg/l	1	03/07/16 15:54	J

Method: EPA 180.1	Batch: W6C0433	Prepared: 03/08/16 11:59					Analyst: mnq
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Turbidity	17	0.024	0.10	NTU	1	03/08/16 13:39	

Method: EPA 335.4	Batch: W6C0406	Prepared: 03/08/16 09:42					Analyst: lac
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Cyanide, Total	ND	2.7	5.0	ug/l	1	03/08/16 17:02	

Method: EPA 350.1	Batch: W6C0610	Prepared: 03/10/16 09:27					Analyst: nra
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Ammonia as N	0.17	0.048	0.10	mg/l	1	03/10/16 15:33	

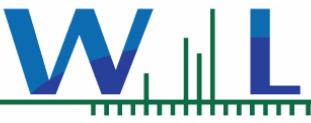
Method: EPA 420.4	Batch: W6C0523	Prepared: 03/09/16 10:11					Analyst: ajw
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Phenolics	0.011	0.0042	0.010	mg/l	1	03/16/16 15:53	

Method: SM 2510B	Batch: W6C0758	Prepared: 03/12/16 09:28					Analyst: dmn
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Specific Conductance (EC)	89	0.23	2.0	umhos/cm	1	03/12/16 10:13	

Method: SM 2540C	Batch: W6C0448	Prepared: 03/08/16 14:00					Analyst: ajw
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Total Dissolved Solids	67	4.0	10	mg/l	1	03/08/16 17:05	

Method: SM 2540D	Batch: W6C0577	Prepared: 03/09/16 16:11					Analyst: ajw
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Total Suspended Solids	47		5	mg/l	1	03/09/16 18:30	

Method: SM 2540F	Batch: W6C0413	Prepared: 03/08/16 10:42					Analyst: dmn
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6C07013-01 EFF-001 (Fruitland Ave)

Sampled: 03/07/16 07:35

Sampled By: Anita Luitel

Matrix: Water

Conventional Chemistry/Physical Parameters by APHA/EPA/ASTM Methods

Method: SM 2540F	Batch: W6C0413	Prepared: 03/08/16 10:42					Analyst: dmn
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Total Settleable Solids	ND	0.10	0.10	ml/l/hr	1	03/08/16 19:05	

Method: SM 4500Cl-G	Batch: W6C0373	Prepared: 03/07/16 16:56					Analyst: ajw
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Chlorine Residual, Total	0.0023	0.0015	0.050	mg/l	1	03/07/16 19:53	*, J

Method: SM 4500H+-B	Batch: W6C0478	Prepared: 03/08/16 16:32					Analyst: mnq
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
pH	7.65	0.10	0.10	Units	1	03/08/16 20:37	*

Method: SM 4500S2-D	Batch: W6C0452	Prepared: 03/08/16 14:21					Analyst: lac
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Sulfide, Soluble	ND	0.012	0.10	mg/l	1	03/08/16 14:52	

Method: SM 5210B	Batch: W6C0340	Prepared: 03/07/16 12:10					Analyst: nra
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Biochemical Oxygen Demand	4.9	2.0	2.0	mg/l	1	03/12/16 14:40	

Field Determinations

Method: Field	Batch: W6C0470	Prepared: 03/07/16 07:35					Analyst: _clnt
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Temperature, Degrees F	61.7			°F	1	03/07/16 07:35	

Hexavalent Chromium by IC

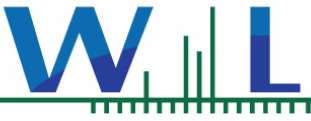
Method: EPA 218.6	Batch: W6C0356	Prepared: 03/07/16 13:21					Analyst: ajp
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Chromium 6+	0.89	0.0048	0.020	ug/l	1	03/09/16 15:30	

Metals by EPA 200 Series Methods

Method: EPA 200.7	Batch: [CALC]	Prepared: 03/10/16 09:59					Analyst: JCK
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Calcium Hardness as CaCO3	13.3		0.250	mg/l	1	03/24/16 12:57	

Method: EPA 200.7	Batch: W6C0613	Prepared: 03/10/16 09:59					Analyst: JCK
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Calcium, Total	5.32	0.0160	0.100	mg/l	1	03/24/16 12:57	

Method: EPA 200.8	Batch: W6C0614	Prepared: 03/10/16 10:09					Analyst: rrl
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier
Arsenic, Total	2.7	0.074	0.40	ug/l	1	03/16/16 15:44	
Cadmium, Total	1.4	0.041	0.10	ug/l	1	03/16/16 15:44	



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Sampled: 03/07/16 07:35

Sampled By: Anita Luitel

Matrix: Water

Metals by EPA 200 Series Methods

Method: EPA 200.8	Batch: W6C0614	Prepared: 03/10/16 10:09						Analyst: rrl
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier	
Chromium, Total	5.2	0.035	0.20	ug/l	1	03/16/16 15:44		
Copper, Total	17	0.13	0.50	ug/l	1	03/16/16 15:44		
Lead, Total	19	0.031	0.20	ug/l	1	03/16/16 15:44		
Selenium, Total	49	0.14	0.40	ug/l	1	03/16/16 15:44		
Silver, Total	ND	0.062	0.20	ug/l	1	03/16/16 15:44		
Thallium, Total	0.38	0.014	0.20	ug/l	1	03/16/16 15:44		
Zinc, Total	440	0.94	5.0	ug/l	1	03/16/16 15:44		

Method: EPA 245.1	Batch: W6C0405	Prepared: 03/08/16 09:35						Analyst: apa
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier	
Mercury, Total	0.023	0.0039	0.050	ug/l	1	03/14/16 16:20	J	

Microbiological Parameters by Standard Methods

Method: SM 9221E	Batch: W6C0900	Prepared: 03/07/16 13:44						Analyst: _wcm
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier	
Fecal Coliform	40		20	MPN/100ml	10	03/10/16 17:29		

Method: SM 9221F	Batch: W6C0900	Prepared: 03/07/16 13:44						Analyst: _wcm
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier	
E. coli	40		20	MPN/100ml	10	03/10/16 17:35		

Subcontracted Analyses

Method: EPA-821-R-02-012	Batch: W6C1581	Prepared: 03/08/16 14:04						Analyst: _sub
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier	
Fish Bioassay, Acute toxicity	See			% Survival	1	03/12/16 14:50	S_ABC	

Attachment

Volatile Organics by EPA Method 624

Method: EPA 624	Batch: W6C0654	Prepared: 03/10/16 11:33						Analyst: rhr
Analyte	Result	MDL	MRL	Units	Dil	Analyzed	Qualifier	
2-Butanone	0.74	0.47	5.0	ug/l	1	03/11/16 03:27	J	
<i>Surr: 1,2-Dichloroethane-d4</i>	<i>105 %</i>	<i>Conc:52.3</i>	<i>82-125</i>	<i>%</i>				
<i>Surr: 4-Bromofluorobenzene</i>	<i>98 %</i>	<i>Conc:48.9</i>	<i>88-108</i>	<i>%</i>				
<i>Surr: Toluene-d8</i>	<i>96 %</i>	<i>Conc:48.1</i>	<i>92-112</i>	<i>%</i>				