

RESOLUTION NO. 540

RESOLUTION OF THE BOARD OF DIRECTORS
OF THE PUGET SOUND AIR POLLUTION
CONTROL AGENCY ADOPTING MODIFIED
PARTICULATE SOURCE TEST PROCEDURES

WHEREAS, Regulation I Section 9.09(f) requires procedures for source sampling performed in connection with standards of Regulation I and II for particulate and gases to be done using current Environmental Protection Agency requirements or procedures and definitions adopted by the Board; and

WHEREAS, to conform to current safe and less toxic chemical storage, the particulate measurement procedures currently used by the Agency have been proposed for modification; and

WHEREAS, the Expanded Advisory Council reviewed and approved said source test laboratory procedure modifications; and

WHEREAS, a public hearing was held by the Puget Sound Air Pollution Control Agency Board of Directors on August 11, 1983, to allow public input and critique on the proposal; and

WHEREAS, the Board deems it necessary to adopt said modification to source test procedures; now therefore,

BE IT RESOLVED BY THE BOARD OF PUGET SOUND AIR POLLUTION CONTROL AGENCY:

The Board of Directors does hereby adopt the modifications to the source test procedures, a copy of which is attached hereto and made a part hereof.

PASSED AND APPROVED by the Board of Directors of the Puget Sound Air Pollution Control Agency held this 12 day of August, 1983.

PUGET SOUND AIR POLLUTION CONTROL AGENCY

By [Signature]
Chairman

Attest:

[Signature]
Air Pollution Control Officer

Approved as to form:

[Signature]
Agency Attorney

**Proposed Revised PSAPCA
Particulate Source Test Procedures**

Engineering Division

Puget Sound Air Pollution Control Agency

200 West Mercer Street, Room 205

P.O. Box 9863

Seattle, Washington 98109

June 9, 1983

I. Procedures for Particulate Source Sampling

Unless otherwise authorized by the Control Officer, all particulate source sampling performed to demonstrate compliance with the emission standards of Regulation I shall be done using current Environmental Protection Agency Methods 1-5 contained in 40 CFR Part 60, Appendix A, as modified in Section II of this document.

II. Procedure for Determining Particulate Matter in the Impinger Catch (Back Half)

The analysis and calculations for Method 5 shall conform to that described by EPA in the current 40 CFR Part 60, Appendix A, except that the back half catch shall be included as particulate matter. The back half weight is the sum of the impinger catch (organic and inorganic) and the back half acetone rinse weights.

A. Sample Recovery of the Back Half

1. Purging

Whenever SO₂ interference is suspected, purge the impingers immediately after the test run is complete with N₂ or clean air for a minimum of one-half the sample volume.

2. Impinger Liquid

Measure the volume of water collected in all impingers and place the water from the first three impingers in a container. Thoroughly rinse all sample-exposed surfaces between the filter and fourth impinger with water and place in above container.

3. Acetone Rinse

Thoroughly rinse all sample-exposed surfaces between the filter and the fourth impinger with acetone and place the washings in a tared beaker to dry.

B. Analysis of the Back Half

1. Impinger Liquid Extraction

- a. Add 50-100 ml of dichloromethane to the impinger liquid.
- b. Spin for at least ten minutes.

- 2-
- c. Pour the liquid into a separatory funnel and drain the organic phase into a tared beaker (organic fraction).
 - d. Drain the remaining liquid into a beaker and repeat Steps a, b, and c. Perform the extraction several times with fresh dichloromethane until the organic fraction is clear. Keep each organic extraction in a separate beaker.
 - e. Following the last extraction, drain the remaining liquid from the separatory funnel into a tared beaker (inorganic fraction).
 - f. Allow the organic fraction beakers to dry under a hood at room temperature.
 - g. Evaporate the inorganic fraction in such a manner that the beaker contents do not become exposed to temperatures greater than 212°F.
 - h. Dry weighed beakers containing a sample of the acetone, dichloromethane and a sample of distilled deionized water to check for blank weight.
 - i. Desiccate organic, inorganic and blank beakers for at least 24 hours at room temperature in a desiccator containing silica gel. Weigh to a constant weight and report the results to the nearest 0.1 mg. Constant weight is defined in Section 4.3 of Method 5.

2. Back Half Acetone Rinse

- a. Dry the acetone rinse in a hood at room temperature.
- b. Desiccate and weigh the beaker to constant weight and record.

C. Reagents

1. Water

Use distilled deionized water in the impingers and to rinse all glassware.

2. Acetone

Use reagent grade, \leq 0.001 percent residue in glass bottles.

3. Dichloromethane

Use reagent grade, \leq 0.001 percent residue in glass bottles.

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

SOURCE TEST METHOD 9A

VISUAL DETERMINATION OF OPACITY FOR A THREE MINUTE STANDARD

1. Principle

The opacity of emissions from stationary sources is determined visually by a qualified observer.

2. Procedure

The observer must be certified in accordance with the provisions of Section 3 of 40 CFR Part 60, Appendix A, Method 9, as in effect on July 1, 1990, which are hereby adopted by reference.

The qualified observer shall stand at a distance sufficient to provide a clear view of the emissions with the sun oriented in the 140° sector to his back. Consistent with maintaining the above requirement, the observer shall, as much as possible, make his observations from a position such that his line of vision is approximately perpendicular to the plume direction, and when observing opacity of emissions from rectangular outlets (e.g., roof monitors, open baghouses, noncircular stacks), approximately perpendicular to the longer axis of the outlet. The observer's line of sight should not include more than one plume at a time when multiple stacks are involved, and in any case, the observer should make his observations with his line of sight perpendicular to the longer axis of such a set of multiple stacks (e.g., stub stacks on baghouses).

The observer shall record the name of the plant, emission location, type of facility, observer's name and affiliation, and the data on a field data sheet. The time, estimated distance to the emission location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), and plume background are recorded on a field data sheet at the time opacity readings are initiated and completed.

The observer should make note of the ambient relative humidity, ambient temperature, the point in the plume that the observations were made, the estimated depth of the plume at the point of observation, and the color and condition of the plume. It is also helpful if pictures of the plume are taken.

Opacity observations shall be made at the point of greatest opacity in the portion of the plume where condensed water vapor is not present. The observer shall not look continuously at the plume, but instead shall observe the plume momentarily at 15-second intervals.

When condensed water vapor is present within the plume as it emerges from the emission outlet, opacity observations shall be made beyond the point in the plume at which condensed water vapor is no longer visible.

When water vapor in the plume condenses and becomes visible at a distinct distance from the emission outlet, the opacity of emissions should be evaluated at the emission outlet prior to the condensation of water vapor and the formation of the steam plume.

Opacity observations shall be recorded to the nearest 1 percent at 15-second intervals on an observational record sheet. Each momentary observation recorded shall be deemed to represent the average opacity of emissions for a 15-second period.

3. Analysis

The opacity of the plume is determined by individual visual observations. Opacity shall be reported as the range of values observed during a specified time period, not to exceed 60 consecutive minutes. The opacity standard is exceeded if there are more than 12 observations, during any consecutive 60-minute period, for which an opacity greater than the standard is recorded.

4. References

Federal Register, Vol. 36, No. 247, page 24895, Dec. 23, 1971.

"Criteria for Smoke and Opacity Training School 1970-1971" Oregon-Washington Air Quality Committee.

"Guidelines for Evaluation of Visible Emissions" EPA 340/1-75-007.

PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY SNOHOMISH COUNTY PIERCE COUNTY SNOHOMISH COUNTY

MAR 2 1993

March 18, 1993

Boeing Commercial Airplane Group
Mr. L. M. Babich III,
PO Box 3707
Seattle WA 98124-2207

Registration Number: 13125, Boeing Renton, Building 10-59
Notice of Construction No. 3406

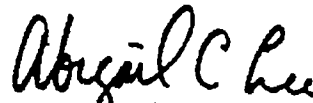
RE: Letter R-1152-93-GVM-115
Exemption from Vertical Stack Requirement of
Regulation I, Article 9, Section 9.16

Dear Mr. Babich:

This is in response to your letter dated February 25, 1993, requesting an exemption from the vertical stack requirement at the Boeing Renton Facility, Building 10-59.

Based on the field inspector's recommendation, we hereby exempt you from the vertical stack requirements, provided that this exemption may be revoked for cause.

Sincerely



Abigail C. Lee
Air Pollution Engineer

ACL:ls

cc: Dic Gribbon, Air Pollution Inspector

Anita I. Frankel, Air Pollution Control Officer

BOARD OF DIRECTORS

Chairman: Win Granlund, Commissioner, Kitsap County
Janet Chalupnik, Member at Large

Peter Hurley, Councilman, Snohomish County
Pete Kinch, Mayor, Everett

Norm Rice, Mayor, Seattle
Doug Sutherland, Pierce County Executive



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

November 30, 1992

Boeing Commercial Airplane Group-Everett
B.J. Thompson
P.O. Box 3707, M/S OH-00
Seattle, WA 98124-2207

Dear Ms. Thompson:

PSAPCA Approval for Exemption to the Requirements
of Regulation I, Section 9.16 "Spray Coating Operations"

Puget Sound Air Pollution Control Agency (PSAPCA) grants your request for an exemption to PSAPCA's odor and nuisance control code, Regulation I, Section 9.16 "Spray Coating Operations", in respect to the spray coating operations ongoing in the buildings listed below at the Everett facility.

- | | | |
|------------|-------|-------|
| Buildings: | 40-21 | 40-22 |
| | 40-23 | 40-24 |
| | 40-25 | 40-26 |
| | 40-31 | 40-32 |
| | 40-33 | 40-34 |
| | 40-35 | |

This is an approval by the Control Officer of PSAPCA to allow the coating of items that cannot be reasonably handled in an enclosed spray area, as required by Regulation I, Section 9.16, subpart (b)(6).

This exemption to the requirements for a filtration system to capture over spray and a vertical stack exhaust to control odors will be valid provided that this exemption may be revoked for cause.

Please direct any questions or comments to Abby Lee at 689-4059.

Sincerely,

Dave S. Kircher
Manager - Engineering

cc: David Smukowski
Pat Bachtel
Jade Hudson

Anita J. Frankel, Air Pollution Control Officer
B O A R D O F D I R E C T O R S

Chairman: Win Granlund, Commissioner, Kitsap County
Vice Chairman: Tim Hill, King County Executive
Peter Hurley, Councilman, Snohomish County

Pete Kinch, Mayor, Everett
Darlene Madenwald, Member at Large
Louis Mentoc, Mayor, Bremerton

Norm Rice, Mayor, Seattle
Joe Siomni, Pierce County Executive
Karen Vialle, Mayor, Tacoma



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY KING COUNTY KING COUNTY SNOHOMISH COUNTY

February 1, 1993

FEB 04 1993

Boeing Commercial Airplane Group
L. M. Babich III
P.O. Box 3707, M/S 63 01
Seattle, WA 98124-2207

RE: Renton - Registration No. 13125 and North Boeing Field - Registration No. 10107
Spray Coating Regulation I, Section 9.16(b)(6) - Approval of exemption

Dear Mr. Babich:

Puget Sound Air Pollution Control Agency (PSAPCA) grants your request for an exemption to PSAPCA's Regulation I, Section 9.16 "Spray Coating Operations", for the spray coating operations ongoing in the buildings listed below at the Renton and North Boeing Field facilities.

North Boeing Field: Building 3-390

Renton: Buildings 4-20, 4-21(Floor #2), 4-56, 4-81, 4-82,
10-50, 51, 55, 56, 57, 59, 10-65

This is an approval by the Control Officer of PSAPCA to allow the coating of items that cannot be reasonably handled in an enclosed spray area, as required by Regulation I, Section 9.16, subpart (b)(6).

This exemption to the requirements for a filtration system to capture over spray and a vertical stack exhaust to control odors will be valid provided that this exemption may be revoked for cause.

Sincerely,

David S. Kircher
Manager - Engineering



PUGET SOUND AIR POLLUTION CONTROL AGENCY
 KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

Attachment 4
Boeing - non-flush

August 1, 1996

Ms. Chris Morris
 Manager, Environmental Affairs
 Boeing Everett Division
 PO Box 3707 MS OH 00
 Seattle, WA 98124-2207

RE: Boeing Letter No.: E-1320-JTF-133

PSAPCA Registration No.: 13120
 Everett Facility, 3003 W Casino Rd., Everett WA 98201

Dear Ms. Morris:

Airplane Cleaning Operations
 Boeing Everett Facility

Puget Sound Air Pollution Control Agency has determined that the "typical airplane cleaning operation" described in your letter of June 13, 1996, is best defined under the Aerospace NESHAP. (40 CFR Part 63 Subpart GG) as a "hand-wipe cleaning" operation. Hand-wipe cleaning operations where wiping, scrubbing, mopping, or other hand actions are used are specifically not included as "flush cleaning."

In your description of your typical airplane cleaning operations, you noted that it is the scrubbing and wiping action that is responsible for removing contaminants from the surface, which meets the above described NESHAP definition of "hand -wipe cleaning operation."

Thank you for offering me the opportunity to watch the operation in person (on third shift). I regretfully excuse myself due to scheduling difficulties. Your description of this cleaning operation is similar to what I have seen at several Boeing facilities and I am confident that this is a reasonable, accurate interpretation of the Aerospace MACT. I am looking forward to more in-depth conversations with you regarding the new MACT standard.

Sincerely,

Abigail C. Lee

Abigail C. Lee
 Air Pollution Engineer

ACL:ls

cc: H. Kimball, J. Fosberg, Boeing
 W. Voegtlin, PSAPCA

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Chairman: Win Grantlund, Commissioner, Kitsap County
 Janet Chalupnik, Member at Large
 Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton
 R.C. Johnson, Councilman, Snohomish County
 Gary Locke, King County Executive

Brian Ebersole, Mayor, Tacoma
 Norman B. Rice, Mayor, Seattle
 Doug Sutherland, Pierce County Executive



PSAPCA **OCT 16 1998**

Attachment 5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

Reply To
Att Of: OAQ-107

OCT 14 1998

Mr. Jay M. Willenberg
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, Washington 98101-2038

Re: Preval Spray Units Applicability to the Aerospace NESHAP

Dear Mr. Willenberg:

This letter is in response to your correspondence to Gregg Wagner, B.F. Goodrich Aerospace, dated August 18, 1998, regarding the applicability of Preval® spray units to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Aerospace Manufacturing and Rework Facilities, 40 CFR Part 63, Subpart GG. Specifically, you determined that the Preval® spray units are exempt from the Aerospace NESHAP and requested concurrence from the Environmental Protection Agency (EPA). EPA concurs with your determination for the reasons explained below.

You have stated that the Preval® system used at B.F. Goodrich Aerospace is a hand-held aerosol can that has a non-refillable pressurized portion. In Appendix A - Specialty Coating Definitions of the Aerospace NESHAP, EPA defines "aerosol coating" as a *hand-held, pressurized, non-refillable container that expels an adhesive or a coating in a finely divided spray when a valve on the container is depressed*. Based on your description, we agree that the Preval® system meets the criteria for being classified as an aerosol coating. Since aerosol coatings are considered specialty coatings, and specialty coatings are exempt from the Aerospace NESHAP [63.741(f)], we have concluded that the Preval® system is exempt from the Aerospace NESHAP.

If, at any time, EPA amends this NESHAP such that specialty coatings are no longer exempt, this applicability determination will need to be revisited. If you have any questions regarding this determination, please contact Andrea Wullenweber at (206) 553-8760.

Sincerely,

Douglas E. Hardesty, Manager
Federal & Delegated Air Programs Unit

cc: Robin Bennett, Boeing Company
Lisa Rutan, Hexcel Corporation
Jim Szykman, EPA OAQPS
Gregg Wagner, B.F. Goodrich Aerospace



Boeing Corp

Attachment 6

PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

February 19, 1999

The Boeing Company
c/o Robin Bennett, Manager - Environmental Regulatory Affairs
PO Box 3707 MS 7A-XC
Seattle WA 98124-2207

Boeing Commercial Airplane Group
Aerospace NESHAP Paint Booth Requirements

Dear Ms. Bennett:

Thank you for your December 21 letter, G-1242-AGW-022, to James Nolan concerning the applicability of the Aerospace NESHAP for certain coatings.

After reviewing the information that you provided; our regulations and EPA's aerospace rules and guidance, we concur that the requirements for coating with inorganic hazardous air pollutants (HAP) do not apply to coatings with HAP concentrations less than 0.1 percent for carcinogens and 1.0 percent for non-carcinogens, the required reporting concentrations for the Material Safety Data Sheet (MSDS) under 29 CFR 1910.1200(g). Specifically, if a coating contains less than 0.1% inorganic HAP, it is not subject to the spray booth requirements for inorganic HAP (40CFR 63.745(g)) even though it may have a concentration of about 0.0002% inorganic HAP. However the requirements for organic HAP and VOC may apply.

PSAPCA concludes that reducing the HAP content to below the reportable thresholds is a desirable pollution prevention approach that should be encouraged. Consider that primers, such as BMS 10-11 and BMS 10-79, often have inorganic HAP concentrations in the 5% to 20% range and the required control efficiency for inorganic HAP is about 90%. Using such a system would result in the same emissions as using a coating that has HAP concentrations in the 0.5% to 2.0% range. Clearly using a coating without add-on control that has less than 0.1% inorganic HAP results in lower emissions than using a coating with 5% HAP and 90% control efficiency.

40CFR63.471(f) states that the requirements of subpart GG do not apply to primers and topcoats containing HAP and VOC concentrations less than 0.1 percent for carcinogens or 1.0 percent for non-carcinogens, as determined from manufacture's representations. When EPA says, "manufacture's representations", they clearly mean the MSDS as they indicated in applicability section of their *Summary of Requirements for Implementing the NESHAP*¹. Elsewhere in that document EPA says that the inspector should observe coating labels and other records for organic HAP and VOC content². Clearly EPA wants to use widely available information to determine if the Aerospace NESHAP applies to a particular activity.

¹ EPA -156/R-97-006, "National Emission Standards for Aerospace Manufacturing and Rework Facilities: Summary of Requirements for Implementing the NESHAP" December 1998, p6

² EPA -156/R-97-006, "National Emission Standards for Aerospace Manufacturing and Rework Facilities: Summary of Requirements for Implementing the NESHAP" December 1998, p52

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Margaret Pagler, City of Seattle, Board Chair
at Chalupnik, Member at Large
David O. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton
Dave Somers, Snohomish County Council
Ron Sims, King County Executive

Brian Ebersole, Mayor, Tacoma
Charlote Gamdo, Commissioner, Kitsap County
Doug Sultherland, Pierce County Executive

10 Union Street, Suite 500, Seattle, Washington 98101-2038

(206) 343-8800

(800) 352-3565

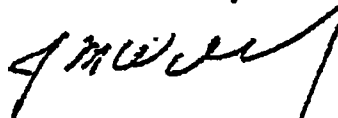
FAX: (206) 343-7522

printed on recycled paper

40CFR 63.745(g) lists coating operation requirements in which any of the primers or topcoats that are "spray applied contain inorganic HAP". The section does not list a lower threshold for determining if a coating contains inorganic HAP. However it seems clear that EPA intended to use the MSDS thresholds of 0.1% and 1.0% for carcinogens and non-carcinogens, because the applicability section of the subpart says that the subpart does not apply to primers and topcoats containing HAP and VOC concentrations less than 0.1 percent for carcinogens or 1.0 percent for non-carcinogens, as determined from manufacture's representations. Although EPA does not say that the section 63.745(g) does not apply to coatings containing less than 0.1% inorganic HAP, we must rely on the applicability section of the subpart and our understanding of EPA's intent. We understand EPA's intent is not to regulate coatings with low concentrations of HAP. We also understand EPA's intent is to have the threshold for regulating a coating the same threshold as required for reporting for the MSDS. Thus an inspector could determine if a coating is regulated under the subpart based on looking at the federally required parts of the MSDS sheet.³ By copy of this letter, we are also requesting EPA's concurrence on this interpretation of the Aerospace NESHAPS.

If you have any questions, please contact Abby Lee at (206) 689-4059 or me at (206) 689-4052.

Sincerely,



Jay M. Willenberg, P.E.
Senior Air Pollution Engineer

JMW:ml

cc: Doug Hardesty, EPA Region 10
Lisa Jacobsen, EPA Region 10
Gregg Wagner, BF Goodrich Aerospace
Katherine Garrison, Hexcel Corporation
Aerospace Team, PSAPCA

³ 29 CFR 1910.1200(g) says that the MSDS can require reporting of concentrations of less than the 1.0% and 0.1% thresholds if there is evidence that the ingredient(s) could be released from the mixture in concentrations which would exceed an established OSHA permissible exposure limit or ACGIH Threshold Limit Value, or could present a health risk to employees. If EPA had intended to use this lower threshold we assume that EPA would have quoted all of the MSDS reporting thresholds and not just one section. Also some MSDS list other ingredients, like inorganic HAP at lower concentration levels for other reasons, such as Calif. Prop. 65. Again if EPA wanted to regulate at these lower thresholds that would have stated so.

APR 05 1999



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 10
 1200 Sixth Avenue
 Seattle, WA 98101

APR 2 1999

Reply To
 Area Of: OAQ-107

Ms. Robin Bennett, Manager
 Environmental Regulatory Affairs
 The Boeing Company
 MS 7A-XC
 P.O. Box 3707
 Seattle, WA 98124-2207

Re: Aerospace NESHAP Rule Interpretation

Dear Ms. Bennett:

This letter is in response to a February 15, 1999, letter from Puget Sound Air Pollution Control Agency (PSAPCA) to Boeing regarding the National Emission Standards for Aerospace Manufacturing and Rework Facilities. We concur with PSAPCA's regulatory interpretation that the inorganic hazardous air pollutant (HAP) coating requirements of §63.745(g) for primers and topcoats do not apply to coatings containing inorganic HAP at a concentration less than 0.1 percent for carcinogens and 1.0 percent for non-carcinogens. The aforementioned threshold concentrations parallel those utilized by Material Safety Data Sheet (MSDS) to require reporting. EPA intended to utilize readily available information to determine applicability, and MSDS provides the most readily available information.

If you have any questions regarding this regulatory interpretation, please contact Dan Meyer of this office at (206) 553-4150.

Sincerely,

Bonnie Thie, Manager
 State & Tribal Air Programs Unit

DM:BT:cb

cc: Ms. Abby Lee, PSAPCA ✓
 Ms. Christi Lee, USEPA Region 10 - Washington Operations Office
 Mr. Jay M. Willenberg, P.E., PSAPCA



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

January 9, 1998

David Moore
The Boeing Company
PO Box 3707, M/S 7A-XC
Seattle, WA 98124

Dear Mr. Moore:

Notice of Construction (NOC) Requirements for Paint Spray Booths

This letter is intended to clarify when PSAPCA would require a Notice of Construction for upgrading or changing paint spray booths.

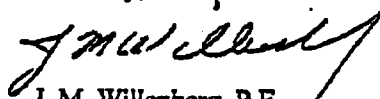
We require a NOC for major changes in control technology or changes that increase emissions. We do not require a NOC for minor changes that do not result in increased emissions from the facility.

Major changes include changing control technology from waterwash to dry filters and increasing the airflow by more than 10 or 15% over originally permitted levels. In general, changing the fan or motor will not increase the flow by more than 15%.

Minor changes include adding an additional stage to a dry filter to meet the Aerospace NESHAP, and moving an existing booth to a new location within the same facility and conducting the same activity. Boeing must notify PSAPCA if the location or use of a booth changes. It is essential that PSAPCA know the location of each booth and that it have some identifier such as the MSS/ID No. so we can properly conduct inspections. The use is important to identify the applicable requirements. An example of a significant change in the activity of a booth is conducting abrasive blasting in a booth that we have not approved to house such an activity.

If you have any additional questions, please call me at 206 689-4052.

Sincerely,


J. M. Willenberg, P.E.
Senior Air Pollution Engineer

JMW:MJ

cc: D. S. Kircher
A. C. Lee
H. A. Bryant
D. J. Gribbon
M. McAfee
R. J. Pogers
M. D. Scarberry

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Commissioner, Kitsap County
Member at Large
Mayor, Everett

Mayor, Bremerton
Snohomish County Council
King County Executive

Mayor, Tacoma
City of Seattle
Pierce County Executive



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

August 10, 1999

Charles Austin
Manager, Environmental Engineering
The Boeing Company
Fabrication Division, A-1320
PO Box 3707, MC 5R-14
Seattle, WA 98040-2207

Dear Mr. Austin:

Registration No. 13117 - Boeing (Auburn)
Small Container Used for Immersion Cleaning with Acetone

Thank you for your January 14, 1999 letter A-1320-ENV-015 to Abigail Lee concerning our clarification of small containers used for immersion cleaning with acetone.

After a recent inspection of your facility, we have determined that small buckets, pails and beakers with capacities of 2 gallons or less used for cleaning with acetone are exempt from Puget Sound Clean Air Agency's Regulation III, Section 3.05, Solvent Metal Cleaners and WAC 173-460-060(5), Solvent Metal Cleaners. However, we encourage you to follow good industrial practice and keep such containers closed at all times, except when adding or removing parts. We also strongly suggest that you hold the part over the container as the part is removed until the dripping stops.

As we review our regulations, we will incorporate this change into the rules.

If you have any additional question on this matter, please contact Abby Lee (206) 689-4059.

Sincerely,

David S. Kircher
Manager - Engineering

DSK:ACL:mj

cc: Robin Bennett
Aerospace Team

AIR-Aub 8/10/99
Sitewide: Acetone Exemption
 << 3626 >>

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Lynn S. Horton, Mayor, Bremerton
Dave Summers, Snohomish County Council
Rin Sims, King County Executive

Brian Ebersole, Mayor, Tacoma
Charlotte Garrido, Commissioner, Kitsap County
Doug Sutherland, Pierce County Executive

Gregory Pageley, City of Seattle, Board Chair
Chalapanth, Member at Large
David O. Hansen, Mayor, Everett



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

May 8, 1995

Hannah Kimball
The Boeing Company
PO Box 3707 M/S 7E EH
Seattle, WA 98124-2207

Dear Ms. Kimball:

Rule Applicability for Cold Solvent Cleaners

In response to your letter of April 13, 1995, the Puget Sound Air Pollution Control Agency (PSAPCA) has determined that Regulation III, Section 3.05, clearly applies to all cold solvent cleaners using a solvent with a true vapor pressure greater than 0.6 psia to degrease metal parts. This rule does not apply to cleaning equipment used exclusively to clean spray guns or nonmetal parts. In addition, the requirements in 40 CFR Part 63 Subpart T apply to batch cold solvent cleaning machines that use more than 5 percent liquid halogenated hazardous air pollutants (HAP).

However, PSAPCA has determined that neither a Notice of Construction nor equipment registration will be required for cold solvent cleaners with a working liquid capacity less than 10 gallons, unless the equipment uses more than 5 percent liquid halogenated HAP solvent. These cleaners will be exempt from registration as allowed by part 17 of Exhibit A, Section 5.03 of Article 5, Regulation I, which exempts only equipment with negligible emissions that are not a threat to health or the environment.

PSAPCA is presently reevaluating Regulation I, Article 5, and Regulation III, Section 3.05, to assure that our requirements are at least as stringent as the EPA NESHAP. We will likely make several changes to our regulations based on this evaluation. We will be happy to involve the Boeing Company in the regulation review process.

Sincerely,

David D. Kircher

David S. Kircher
Manager - Engineering

mj

cc: A. C. Lee
M. L. Corbin
J. K. Anderson
J. M. Willenberg

Dennis J. McLellan, Air Pollution Control Officer

BOARD OF DIRECTORS

Chairman: Wm. Cranford, Commissioner, Kitsap County
Janet Chalupnik, Member at Large
Edward D. Hansen, Mayor, Everett

John S. Higgins, Mayor, Bremerton
R. C. Johnson, Commissioner, Snohomish County
Cathy Laska, King County Executive

Harold L. Stone, Mayor, Tacoma
Norman H. Rupp, Mayor, Seattle
Doug Butterland, Pierce County Executive



Working Together For Clean Air

June 14, 2000

Robin Bennett
Manager, Environmental Regulatory Affairs
The Boeing Company
PO Box 3707 MC 7A-XC
Seattle, WA 98124-2207

Dear Ms. Bennett:

Equivalency Determination for
Safety Kleen Models 1107 and 1111 Gun Cleaning Systems
with Gun Cleaning Techniques in 40 CFR 63.744(c)

Thank you for your March 8, 2000 letter G-1242-AGW-003 dealing with equivalency demonstration for Safety Kleen Models 1107 and 1111 gun cleaning systems with gun cleaning techniques in 40 CFR 63.744(c).

We have reviewed the regulation, information that you provided including the manufacturer's instructions for Safety Kleen Models 1107 and 1111, and additional information provided by Safety Kleen. 40 CFR 63.744(c) requires spray guns to be cleaned using one or more of the techniques specified in 40 CFR 63.744(c)(1) through (4), or their equivalent. The Puget Sound Clean Air Agency concurs with your demonstrations that the procedures that you described in your March 8, 2000 letter and that are described in Safety Kleen's directions for Models 1107 and 1111 gun cleaners are equivalent to those specified in 40 CFR 63.744(c)(2) and (3) with the following conditions:

1. The collar that vents to the basin to the atmosphere when the cleaner is switched on does not vent to the atmosphere when the cleaner is off. According to Heyler Davis of Safety Kleen, that is the way the equipment is designed.
2. For the Model 1111, the bi-fold door shall be closed at all times (see Final Cleaning Step 8) except when operating the cleaner in manual mode, when putting parts into or taking parts out of the cleaner, or when the drain hose does not drain to a container that contains solvent.

This equivalency determination only applies to Safety Kleen Models 1107 and 1111 used according to the Safety Kleen's directions, with Safety Kleen gun cleaner solvent that has a vapor pressure less than 45 mm Hg at 20°C, and the additional description that you provided in your March 8, 2000 letter. We expect that Boeing will incorporate into the specific O&M Plans or operator instructions or checklists the descriptions that are in your letter and Safety Kleen's directions. Specifically, the operator instructions or checklists should

Ph 206.343.8800

1.800.552.3565

Fax 206.343.7522

www.pscleanair.org

EXECUTIVE DIRECTOR

Dennis J. McLerran

BOARD OF DIRECTORS

OF SEATTLE. BOARD CHAIR

Margaret Pageler

KING COUNTY EXECUTIVE

Ren Sims

KITSAP COUNTY

Clotilde Garrido, Commissioner

BERKE COUNTY EXECUTIVE

Doug Sutherland

WASH COUNTY COUNCIL

Dave Somers

EVERETT

Edward O. Hansen, Mayor

BREMERTON

Lynne S. Herten, Mayor

TACOMA

Bill Evans, Councilman

MEMBER AT LARGE

Janet Chalupnik

**PUGET SOUND
Clean Air Agency**
18 Union Street, Suite 500
Seattle, Washington 98101

Working Together For Clean Air

January 30, 2001

Edward Cierebiej
The Boeing Company
PO Box 3707, MC 5R-14
Seattle, WA 98124-2207

Dear Mr. Cierebiej:

Boeing (Auburn), Registration No. 13117
Boeing (Frederickson), Registration No. 17771
Mobile Equipment

Thank you for your September 19, 2000 letter (A-1320-RGS-101) concerning the definition of "Mobile Equipment."

The Puget Sound Clean Air Agency concurs with your interpretation of Regulation II, Section 3.04. Specifically, we concur that *mobile equipment* as it relates to Boeing facilities is intended to mean equipment that is licensed or likely to be licensed to operate on a public roadway. For example, the definition does not apply to jigs and carts used to move parts and equipment in and around buildings at Boeing facilities. However, the definition does apply to the trucks and trailers that move parts between Boeing facilities, such as the large trucks and trailers that move wing parts from Frederickson to Everett.

We will include this clarification in your air operating permit, if we have not changed the rule by then.

If you have any questions on this matter, please contact me at (206) 689-4052 or jayw@psc Clean Air.org.

Sincerely,

Jay M. Willenberg
Senior Engineer

JMW:mj

cc: Robin Bennett, Boeing
J. L. Nolan
Aerospace Team

Ph 206.343.3800

1.800.582.3865

Fax 206.343.7522

www.pscleanair.org

EXECUTIVE DIRECTOR
Dennis J. McLerran

BOARD OF DIRECTORS
CITY OF SEATTLE, BOARD CHAIR
Margaret Engeler

KING COUNTY EXECUTIVE
Ron Sims

KITZAP COUNTY
Charlotte Garret, Commissioner

MERCER COUNTY EXECUTIVE
Doug Sutherland

SNOWHOMISH COUNTY COUNCIL
Dave Samers

EVERETT
Edward G. Norton, Mayor

BREMERTON
Lynn S. Norton, Mayor

TACOMA
Eli Evans, Councilman

MEMBER AT LARGE
Janet Chelvanak



PUGET SOUND AIR POLLUTION CONTROL AGENCY
 KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

David W. Moore
 Environmental Regulatory Affairs
 The Boeing Company
 P.O. Box 3707, MS 7A-XC
 Seattle, WA 98124-2207

January 15, 1998

Dear Dave:

Thank you for your December 10, 1997 E-mail concerning compliance with solvent composition limits. Jim has asked me to respond directly to you.

We believe that you are correct in stating that the Aerospace NESHAP accepts the manufacturer's supplied data in order to demonstrate compliance with many of the solvent and HAP requirements. In the case of hand-wipe cleaning solvents it is the only method cited in the rule for determining approved composition (see section 63.750 (a)).


In other areas, such as with the VOC content of primers and topcoats, the rule also cites EPA Method 24 as the reference method (see section 63.750 (c)(1)).

For the purpose of periodic monitoring and certification under Title V, Boeing may use manufacturer's supplied data as we have proposed in the draft permits that you have seen. We do not intend to change those parts of the permits. Where the Aerospace NESHAP also cites other methods, such as EPA Method 24, PSAPCA reserves the right to use those methods or to require that Boeing use the reference method.

As in the past, PSAPCA does not envision requiring reference method testing on a routine basis. For the Aerospace NESHAP we only envision requiring reference method testing if there is evidence that the manufacturers' data may be erroneous.

If you have any additional questions on this issue, please call Jay Willenberg of our staff (206) 689-4052.

Sincerely,



Neal J. Shulman
 Manager-Inspection

cc: PSAPCA Aerospace Inspection/Engineering Team

Dennis J. McLerran, Air Pollution Control Officer

BOARD OF DIRECTORS

Commissioner, Kitsap County
 Member at Large
 Mayor, Everett

Mayor, Bremerton
 Snohomish County Council
 King County Executive

Mayor, Tacoma
 City of Seattle
 Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038 (206) 343-8800 (800) 552-3565 FAX: (206) 343-7522

printed on recycled paper



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

June 22, 1995

Jenette Ramos
Boeing Commercial Airplane Group
PO Box 3707 MS 63 41
Seattle WA 98124-2207

RE: Letter No.: R-1150-95-IL-327

PSAPCA Registration No.: 13125

Site address: Renton Facility, 800 Logan Ave N, Renton, WA 98055

**Exemption from Registration Granted
Notice of Construction Not Required**

Puget Sound Air Pollution Control Agency (PSAPCA) has determined that neither a Notice of Construction, nor equipment registration will be required for the Dust collector or the Kevlar cutting room located in building 4-42 as described in your letter of June 1, 1995.

This equipment will be exempt from registration as allowed by part 17 of Exhibit A, Section 5.03 of Article 5, Regulation I, which exempts only equipment with negligible emissions, that are not a threat to health or the environment.

This equipment may not be modified or replaced unless the owner or operator has submitted *and received approval for a new* Notice of Construction in compliance with Article 6 of Regulation 1.

Sincerely,

David D. Kember

for Jay Willenberg
Senior Air Pollution Engineer

JW:ls

cc: Hannah Kimball, Irina Lutsenko, Boeing
V. Aguilar, PSAPCA Air Pollution Inspector

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Chairman: Win Granlund, Commissioner, Kitsap County
Janet Chalupnik, Member at Large
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton
R.C. Johnson, Councilman, Snohomish County
Gary Locke, King County Executive

Harold G. Moss, Mayor, Tacoma
Norman B. Rice, Mayor, Seattle
Doug Sutherland, Pierce County Executive



PUGET SOUND AIR POLLUTION CONTROL AGENCY
 KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

May 20, 1999

Mr. Frank Migaiolo
 Manager, Everett Environmental Affairs
 The Boeing Company
 PO Box 3909, MC OH-00
 Seattle, WA 98124

Dear Mr. Migaiolo:

Acceptable Pressure Drop Limits for Dry Filter Banks Subject to the Aerospace NESHAP


Thank you for letter dated March 10, 1999 (Letter No. E-1320-JTF-060) discussing using zero as a lower limit for the pressure differential range. Puget Sound Air Pollution Control Agency (PSAPCA) concurs that a lower pressure drop limit of zero is acceptable under certain conditions.

Our understanding from your letter and our inspections is that under some normal operating conditions, such as a clean filter and low air flows, the pressure drop across a spray booth filter is around 0.01 to 0.03 inches of water. Also, slight fluctuations in air velocities can result in pressure drop readings of zero, even with the use of pressure transducers with calibration and accuracy error of approximately +/- 0.01 inch.

While pressure drop readings near zero are acceptable, we strongly encourage Boeing to identify in its O&M Plan (as required in Regulation I, Section 7.09) alternate monitoring parameters that assure proper operation of the filters and booth when such low levels are detected.

If you have any questions, please contact me at (206) 689-4052 or engpermits@PSAPCA.org.

Sincerely,


 Jay M. Willenberg
 Senior Air Pollution Engineer

JMW:mj

cc: Robin Bennett, The Boeing Company
 Aerospace Team

Dennis J. McLerran, Air Pollution Control Officer

BOARD OF DIRECTORS

Margaret Popelar, City of Seattle, Board Chair
 Janet Chakrapani, Member at Large
 Edward D. Hansen, Mayor, Everett

Lynn S. Harmon, Mayor, Bremerton
 Dave Somers, Snohomish County Council
 Ron Sims, King County Executive

Brian Eberole, Mayor, Tacoma
 Charlene Carrido, Commissioner, Kitsap County
 Doug Sutherland, Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038 (206) 343-8800 (800) 552-3565 FAX: (206) 343-7522

Puget Sound Clean Air Agency
1000 Union Street, Suite 300
Seattle, Washington 98101

October 10, 2001

Jade Hudson
Boeing Commercial Airplane Group
PO Box 3707 M/C 5R-410
Seattle, WA 98124-2207

Dear Ms. Hudson:

Notice of Construction (NOC) Requirements for Scrubbers and Baghouses

This letter seeks to clarify when Puget Sound Clean Air Agency requires a Notice of Construction (NOC) for upgrading or altering existing scrubbers and baghouses. Per Agency Regulation I Section 6.03(a), a new NOC is required if a "substantial alteration" of control equipment on an existing source is made. The type of alteration that would be considered substantial varies depending on the control equipment.

On January 9, 1998, Jay Willenberg of this Agency wrote a letter to David Moore of Boeing discussing NOC applicability for spray booths. This letter stated that a NOC is required if airflow is increased by more than 10 to 15 percent over the original permitted airflow levels (this type of change is therefore substantial). In general, changing the fan or motor will not increase the airflow by more than 15 percent over the original permitted airflow.

Per the January 9, 1998 letter, an NOC is not needed if moving an existing booth to a new location within the same facility, so long as the same activities continue to be conducted in the booth. The letter emphasizes that while a new NOC is not needed for relocation, it is essential that Boeing notify the Agency of any relocations so that the Agency can properly conduct inspections.

The Agency will extend the guidance discussed above for spray booths to scrubbers and baghouses. This guidance is valid providing the alteration does not expand or increase the emission generation activity which the control equipment is supporting. An example of an expanded emission generation condition would be the inclusion of additional tanks

EXECUTIVE DIRECTOR
Dennis J. McLerran

BOARD OF DIRECTORS
OHOSHEH COUNTY COUNCIL, CHAIR
Dave Somers

SEATTLE
Paul Schell, Mayor

KING COUNTY EXECUTIVE
Ron Sims

ITSAP COUNTY COMMISSIONER
Jan Angel

PIERCE COUNTY EXECUTIVE
John Ledeburg

EVERETT
Eswate D. Hansen, Mayor

BREMERTON
Lynn S. Horton, Mayor

TACOMA
Bill Evans, Councilman

MEMBER AT LARGE
Janet Chalupnik

Ph 206.343.8800
1.800.552.3565
Fax 206.343.7522

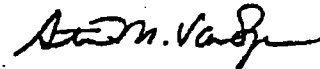
www.pscleanair.org

10-10-2001

1 of 2

or shops to the exhaust system which were previously not exhausted. If questions of applicability arise for specific scrubbers or baghouses that do not clearly fit this guidance, the Agency requires that Boeing contact the Agency directly to discuss the issue.

Sincerely,



Steven M. Van Slyke, P.E.
Supervisory Engineer

SMV:AZM:ns

Enclosure: January 9, 1998 Letter from Jay Willenberg

cc: Robin Bennett, MC 7A-XC
Edward Cierebiej, MC 5R-410
Barbara Thompson, MC 20-13
Kirk Thomson, MC 7A-XE
J. L. Nolan
J. M. Willenberg
Acrospace Team

10-10-2001
2 of 2



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

David W. Moore
Environmental Regulatory Affairs
The Boeing Company
P.O. Box 3707, MS 7A-XC
Seattle, WA 98124-2207

January 15, 1998

Dear Dave:

Thank you for your December 10, 1997 E-mail concerning compliance with solvent composition limits. Jim has asked me to respond directly to you.

We believe that you are correct in stating that the Aerospace NESHAP accepts the manufacturer's supplied data in order to demonstrate compliance with many of the solvent and HAP requirements. In the case of hand-wipe cleaning solvents it is the only method cited in the rule for determining approved composition (see section 63.750 (a)).

In other areas, such as with the VOC content of primers and topcoats, the rule also cites EPA Method 24 as the reference method (see section 63.750 (c)(1)).

For the purpose of periodic monitoring and certification under Title V, Boeing may use manufacturer's supplied data as we have proposed in the draft permits that you have seen. We do not intend to change those parts of the permits. Where the Aerospace NESHAP also cites other methods, such as EPA Method 24, PSAPCA reserves the right to use those methods or to require that Boeing use the reference method.

As in the past, PSAPCA does not envision requiring reference method testing on a routine basis. For the Aerospace NESHAP we only envision requiring reference method testing if there is evidence that the manufacturers' data may be erroneous.

If you have any additional questions on this issue, please call Jay Willenberg of our staff (206) 689-4052.

Sincerely,

Neal J. Shulman
Manager-Inspection

cc: PSAPCA Aerospace Inspection/Engineering Team

Dennis J. McLerran, Air Pollution Control Officer
B O A R D O F D I R E C T O R S

Commissioner, Kitsap County
Member at Large
Mayor, Everett

Mayor, Bremerton
Snohomish County Council
King County Executive

Mayor, Tacoma
City of Seattle
Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038 (206) 343-8800 (800) 552-3565 FAX: (206) 343-7522



1111 Union Street, Suite 500
Seattle, WA 98101

Working Together For Clean Air

August 27, 2001

Neva Welch
The Boeing Company
PO Box 3707, MC 5R-14
Seattle, WA 98124-2207

Dear Ms. Welch:

Applicability of Puget Sound Clean Air Agency
Regulation III, Section 3.05, Solvent Metal Cleaners

In your August 22, 2001 fax, you requested that the Puget Sound Clean Air Agency exclude all solvent containers with a capacity of two gallons or less from the definition of "cold solvent cleaner," "cold cleaner," and "solvent metal cleaner," as it applies to Puget Sound Clean Air Agency's Regulation III, Section 3.05. This request also cited a letter dated August 10, 1999 from David S. Kircher of the Puget Sound Clean Air Agency to Charles Austin of Boeing, which stated that acetone containers with a capacity less than two gallons are not regulated under the Agency's Regulation III, Section 3.05.

The determination made by Mr. Kircher in 1999 was specifically for acetone, which is not a Volatile Organic Compound (VOC) and is not a Hazardous Air Pollutant (HAP). The Agency is not able to make this same determination for other solvents that may be VOCs or HAPs. In the future, the Agency would be pleased to evaluate this issue on a case-by-case basis for specific solvents that are not VOCs and/or HAPs.

~~Please feel free to contact Steve Van Slyke at (206) 689-4052 or Agata McIntyre at (206) 689-4061 with any further questions.~~

Sincerely,

James L. Nolan
Director of Compliance

JLN:AZM:mj

cc: Barbara Thompson, MC 20-13
Kirk Thomson, MC 7A-XE
Robin Bennett, MC 7A-XC
S. M. Van Slyke
Aerospace Team
M. McAfee
E. M. Gilpin

Ph 206.343.8800

1.800.552.3565

Fax 206.343.7522

www.pscleanair.org

EXECUTIVE DIRECTOR

Dennis J. McLerran

BOARD OF DIRECTORS

SNOHOMISH COUNTY COUNCIL, CHAIR

Dave Samers

SEATTLE

Paul Schell, Mayor

KING COUNTY EXECUTIVE

Ron Sims

KITSAP COUNTY COMMISSIONER

Jan Angel

PIERCE COUNTY EXECUTIVE

John Ledeburg

EVERETT

Edward D. Hansen, Mayor

BREMERTON

Lynn S. Horton, Mayor

TACOMA

Bill Evans, Councilman

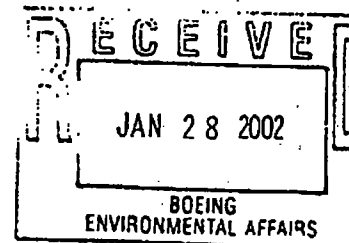
MEMBER AT LARGE

Janet Chalvort



Working Together For Clean Air

January 18, 2002



Robin Bennett
 Manager, Environmental Regulatory Affairs
 The Boeing Company
 P.O. Box 3707, MC 7A-XC
 Seattle, WA 98124-2207

Dear Ms. Bennett:

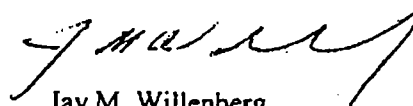
"New Source" Requirements for Spray Gun Cleaning Operations

Thank you for your April 26, 2001 letter, G-1242-AGW-005, concerning "New Source" Requirements for Spray Gun Cleaning Operations. We have reviewed the letter and the references, and we agree with the approach outlined in your letter. Specifically we concur with the following:

1. The Puget Sound Clean Air Agency does not require a Notice of Construction of spray gun cleaning operations unless those operations are subject to a NESHAP or NSPS.
2. Construction of a new spray gun cleaning operation occurs when Boeing starts cleaning spray guns in an area, such as a paint shop or hanger, where spray gun cleaning subject to the Aerospace NESHAP, 40 CFR 63 subpart GG, has never previously existed. Therefore, under Puget Sound Clean Air Agency Regulation I, Section 6.03(a)(3) a Notice of Construction Application is only required when Boeing intends to clean spray guns in an area where such activity has not previously occurred.
3. Different methods of gun cleaning or types of gun cleaners in the same area at a facility do not constitute separate affected sources. Hence, at an existing area, Boeing can change to any Aerospace NESHAP compliant gun cleaning method or equipment without a Notice of Construction.
4. Reconstruction of an existing gun cleaning operation does not include replacing parts or equipment that does not involve capital expenditures of less than \$5,000. However, construction of a new gun cleaning operation may involve expenditures of less than \$5,000. It need only involve gun cleaning in a new area.

If you have any question on the matter, please contact me at 206) 689-4057 or jayw@pscleanair.org.

Sincerely,


 Jay M. Willenberg
 Senior Air Pollution Engineer

EXECUTIVE DIRECTOR
 Dennis J. McLellan

BOARD OF DIRECTORS
 SNOHOMISH COUNTY COUNCIL, CHAIR
 Dave Somers

SEATTLE
 Paul Schell, Mayor

KING COUNTY EXECUTIVE
 Ron Sims

KITSAP COUNTY COMMISSIONER
 Jan Arup

PIERCE COUNTY EXECUTIVE
 John Ladenburg

EVERETT
 Edward D. Hansen, Mayor

BREMERTON
 Lynn S. Horton, Mayor

TACOMA
 Bill Evans, Councilman

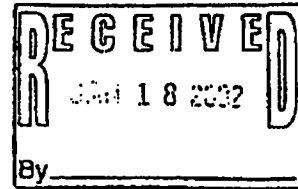
MEMBER AT LARGE
 Janet Peterson

Ph 206 343 3400

1 800 552 3565

Fax 206 343 7522

www.pscleanair.org



January 16, 2002

Neva Welch
Auburn Environmental Affairs
PO Box 3707 MS 5R-14
Seattle, WA 98124-2207

Dear Ms. Welch:

Operating Permit No. 13117
Solvent Metal Cleaners

This letter is in answer to your question regarding the applicability of Puget Sound Clean Air Agency (Agency) Regulation III Section 3.05 for solvent metal cleaners. In a September 30, 2001 email to Agata McIntyre (Agency) you asked, "Is a tank that is used to clean wet paint from metal tools and equipment considered a degreasing tank?" This question was with reference to whether certain paint cleaning activities at the Boeing Auburn facility would be regulated under Agency Regulation III Section 3.05.

On October 5, 2001, Agency representatives John Schantz and Agata McIntyre visited the Boeing Auburn facility to discuss this question with you in person and to view the paint cleaning activities to which you were referring. The activity seen during the visit was the cleaning of metal spatulas that had been coated with paint. During the visit you indicated that these spatulas are soaked in canisters of solvent to remove the paint. The Agency believes this activity is a paint removal activity, and paint removal activities are not subject to regulation under Agency Regulation III Section 3.05.

The Agency strongly encourages Boeing to continue its good housekeeping activities to reduce solvent evaporation. Please feel free to contact Agata McIntyre at (206) 689-4061, or me, at (206) 589-4052 with any further questions.

Sincerely,

Steven M. Van Slyke, P.E.
Supervisory Engineer

SMV:AZM:ns

cc: John S. Schantz
Aerospace Team

Ph: (206) 343-8800
T: (206) 343-3565
Fax: (206) 343-7577

www.pscleanair.org

- EXECUTIVE DIRECTOR
Dennis J. McLerran
- BOARD OF DIRECTORS
SNOHOMISH COUNTY COUNCIL, CHAIR
Dave Somers
- SEATTLE
Paul Schell, Mayor
- KING COUNTY EXECUTIVE
Ron Sims
- ISAP COUNTY COMMISSIONER
Jan Ange
- PIERCE COUNTY EXECUTIVE
John Laderburg
- EVERETT
Edward D. Hansen, Mayor
- BREMERTON
Lynn S. Nelson, Mayor
- TACOMA
Bill Evans, Councilman
- MEMBER AT LARGE



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

June 6, 1995

JUN 8 1995

L. M. Babich III
Environmental Affairs Manager
Renton Division
Boeing Commercial Airplane Group
PO Box 3707 MS 63 41
Seattle WA 98124-2207

Boeing Letter No.: 1150-95-338

PSAPCA Registration No.: 13125 Renton and 10107 North Boeing Field

Dear Mr. Babich:

Spray Coating Regulation I, Section 9.16(b)(6)
Approval of Exemption Request

Puget Sound Air Pollution Control Agency (PSAPCA) grants your request of June 5, 1995 for an exemption to PSAPCA's Regulation I, Section 9.16, "Spray Coating Operations", for the spray coating operations conducted on the flight lines at the Renton and North Boeing Field facilities.

This is an approval by the Control Officer of PSAPCA to allow the coating of items that cannot be reasonably handled in an enclosed spray area, as required by Regulation I, Section 9.16, subpart (b)(6).

~~This exemption to the requirements for a filtration system to capture over spray and a vertical stack exhaust to control odors will be valid provided that this exemption may be revoked for cause.~~

Sincerely,

Jay Willenberg
Senior Air Pollution Engineer

JW:ls

cc: Guy Moellendorf, Boeing
Abigail Lee, PSAPCA Air Pollution Engineer

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Chairman: Win Granlund, Commissioner, Kitsap County
Janet Chalupnik, Member at Large
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton
R.C. Johnson, Councilman, Snohomish County
Gary Locke, King County Executive

Harold G. Moss, Mayor, Tacoma
Norman B. Rice, Mayor, Seattle
Doug Sutherland, Pierce County Executive

Moellendorf, Guy V

From: Fosberg, John T
Sent: Monday, January 06, 2003 8:04 AM
To: Moellendorf, Guy V; Hudson, Jade J; May, Gary R; Iwicki, Matt; Migaiolo, Frank J; Verhaar, Michael L; Welch, Neva M; Turvey, Jonathan D; Lords, Teresa E
Subject: FW: Meaning of "month" and "week"

Here is Agata's response to the week/month issue.

John T. Fosberg
Everett Environmental Affairs
M/C OK-PP
Phone: (425) 717-0988
Pager: (425) 631-2731

-----Original Message-----

From: Agata McIntyre [mailto:AgataM@pscleanair.org]
Sent: Thursday, January 02, 2003 9:47 AM
To: Fosberg, John T
Cc: Steve Van Slyke; Aerospace Team; Central Files Archive
Subject: FW: Meaning of "month" and "week"

John,

Per your December 18 email, you proposed a way that Boeing will interpret the terms "monthly" and "weekly" in Section II.A.2(d) of the NBF/Plant 2 and Frederickson AOPs when these terms are not accompanied by the word "calendar". Based on the information you provided, it appears that Boeing has reviewed the issue carefully and feels comfortable with this interpretation. I don't have any concerns with your interpretation. However, I would ask that Boeing be clear about when the interpretation is taken so that there is no confusion at a later date. In case of future questions regarding AOP interpretations, I suggest that Boeing use its best judgment in forming and following interpretations while ensuring that the requirements of the AOP are being met.

Regards,

Agata McIntyre
Air Pollution Engineer
Puget Sound Clean Air Agency
110 Union Street Suite 500
Seattle WA 98101-2038
(206) 689-4061
AgataM@pscleanair.org

-----Original Message-----

From: Fosberg, John T. [mailto:john.t.fosberg@boeing.com]
Sent: Monday, December 23, 2002 3:32 PM
To: 'agatam@pscleanair.org'
Subject: RE: Meaning of "month" and "week"

Agata,

Thanks for your phone message on this subject. Would you mind summarizing your conclusion in an email back to me?

1-6-2003
1 of 3

Thanks,

John T. Fosberg
Everett Environmental Affairs
M/C OK-FP
Phone: (425) 717-0988
Pager: (425) 631-2731

> -----Original Message-----

> From: Fosberg, John T
> Sent: Wednesday, December 18, 2002 9:39 AM
> To: 'agatam@psc Cleanair.org'
> Subject: Meaning of "month" and "week"

> Agata,

> We'd like to discuss the meaning of the terms "month" or "monthly" and
> "week" or "weekly" as they appear in Section II.A.2(d) of the NBF/Plant 2,
> Everett, and Frederickson air operating permits.

> We believe that when the word "month" or "monthly" is used to specify the
> frequency of an inspection required under II.A.2(d), without use of the
> term "calendar," either of the following two procedures (among other
> possibilities) are proper:

> (1) the inspection may be performed at least once each calendar month, on
> any day of that calendar month; or

> (2) the inspection may be performed at least once each consecutive 28-day
> period, on any day of that 28-day period (a 28-day period chosen since 28
> days is the minimum number of days in any calendar month)

> The U.S. EPA's flexibility on this issue is illustrated, for example, by
> its definition of "month" in the recently promulgated NESHAP for the
> Surface Coating of Large Appliances which is "a calendar month or a
> pre-specified period of 28 to 35 days to allow for flexibility in
> recordkeeping when data are based on a business accounting period." See
> 40 CFR § 63.4181.

> It should be noted that on a 28-day schedule, it is possible that an
> inspection may not be performed during a calendar month. This would
> occur, for example, if an inspection was performed on the first day of a
> 28-day inspection period that was coincidentally the last day of a

> calendar month and then not performed again until at least five days into
> the next 28-day period.

> 28-day period Date inspection performed
> November 2 - November 29 November 5
> November 30 - December 27 November 30
> December 28 - January 24 January 2

> However, it should also be noted that on a 28-day schedule an inspection
> will occur on average 13 times in a calendar year (and occur, on average,
> every 28 days) whereas on a calendar month schedule the inspection will
> only occur 12 times in a calendar year (and occur, on average, every 30.4
> days).

> Similar to the words "month" or "monthly," we believe that when the word
> "week" or "weekly" is used to specify the frequency at which an inspection
> is required to be performed under II.A.2(d), the inspection may either be
> performed at least once each conventional (i.e. Sunday through Saturday)
> week, on any day of that conventional week, or the action may be performed
> at least once every consecutive 7-day period (e.g. Friday through Thursday
> - Boeing's business and accounting systems' week), on any day of that
> consecutive 7-day period.

> So that there is no confusion as to what schedule is being followed at a
> particular facility, Boeing air operating permit sites will specify in
> their O&M Plans or other documentation whether they are following a
> calendar schedule or a 28-day/7-day schedule to satisfy a monthly/weekly
> inspection frequency from Section II.A.2(d) of the air operating permit.

> Once you've had a chance to review this issue, please give me a call and
> we can discuss it further.

> Thanks,

> John T. Fosberg
> Everett Environmental Affairs
> M/C OK-FP
> Phone: (425) 717-0988
> Pager: (425) 631-2731
>

Steve Van Slyke

From: Steve Van Slyke
Sent: Friday, September 14, 2001 3:30 PM
To: Barbara J Thompson (E-mail)
Cc: Jim Nolan
Subject: FW: New NOC rule interpretation

PAGE 1 OF 2

Barbara,

I needed to respond to your request for confirmation with respect to documentation requirements under Reg. I, Section 6.03(c). Your observations are correct. It is not necessary to maintain records for each exempted unit in order to certify compliance for Air Operating Permit requirements. Additionally, a timely response to a request for information which "documents" the basis for the exemption will meet our needs.

I would expect that this type of request would occur infrequently as the exemptions provide the benefit for new equipment installed from the adoption date moving forward. Also, I am assuming such a request for documentation would occur only in times when it is not clear to staff on an inspection team how some new equipment fits under the exemption list. I have suggested to the inspectors that they should not spend a great deal of time trying to research the regulatory interpretation during an inspection onsite. If new equipment is noted and it is not clear how an exemption would cover that installation, I've suggested the inspector ask the source to provide the documentation you've mentioned. It is my hope that the questions for all will be most frequent during the early months of this rule change implementation and that as more equipment is installed under the exemption allowances, the experience and resulting questions will decrease.

I also need note that equipment installed under the NOC exemption provisions will still be subject to general regulatory requirements found in the regulations (e.g. Reg. I, Section 9.03) and covered for those requirements in the operating permit terms and conditions. Also, we will not be using the exemptions under Section 6.03(c) to eliminate any existing NOC approval orders. This is a forward looking program intended to save time and money and revisiting history will not help on either need.

I hope this provides you the confirmation you needed. If you need more or have other questions, please feel free to contact me.

Steve Van Slyke
 Puget Sound Clean Air Agency
 110 Union St., Suite 500
 Seattle, WA 98101-2038

(206) 689-4052
 (206) 343-7522 (fax)

-----Original Message-----

From: Jim Nolan
Sent: Friday, August 31, 2001 8:00 AM
To: Steve Van Slyke
Subject: FW: New NOC rule interpretation

's discuss Barb's request.

James Nolan, Director-Compliance
 Puget Sound Clean Air Agency

PAGE 1

110 Union St., Suite 500
Seattle, WA 98115
206-689-4053
jimn@psc Clean Air.org

9-14-2001
PAGE 2 OF 2

---Original Message-----

From: Thompson, Barbara J [mailto:barbara.j.thompson@Boeing.com]
Sent: Thursday, August 30, 2001 3:43 PM
To: Jim Nolan (E-mail)
Subject: New NOC rule interpretation

Jim,
Thank you for discussing the new NOC rule passed by the Board on July 12, 2001. Boeing's environmental team feels that the exemption lists in Reg. I:6.03(b) &(c) are an improvement to the current NOC rule. As you are aware, there are numerous emissions units and activities at our facilities that would qualify for exemption under Section 6.03(c), and we expect that many more will be added in the future.
Per our discussion, I would like to document our agreement regarding the new Section 6.03(c)'s provisions for documenting the applicability of these exemptions. Boeing understands that it will be considered to have met the requirement that "sufficient records are kept to document the exemption" if, upon request by the Agency, we provide in a timely manner any information reasonably necessary to demonstrate the applicability of the exemption. Physical evidence of the emissions unit or activity itself can oftentimes fully document the applicability of an exemption. For example, the nameplate on an emissions unit can document its "rated capacity." Similarly, simply observing an emissions unit or activity, such as "hand held sanding equipment," can sometimes fully demonstrate the applicability of an exemption.
We would appreciate your written confirmation of our understanding that if, upon request of your Agency, we produce in a timely manner any information reasonably necessary to demonstrate the applicability of an exemption for a particular emissions unit or activity then we will be considered to have met the requirements of Reg. I:6.03 (c), and the keeping of actual records for each exempted emissions unit or activity is not necessary in order to certify compliance with our current or future Air Operating Permits. In the interim, if you have any questions or concerns, please do not hesitate to contact me at the number below

Thank you,
Barbara J. Thompson
Director Environmental Affairs
Commercial Airplanes
PO 3707 MS 20-13
Seattle, WA 98124-2207

PAGE 2

07-11-2000 FRI 12:33 FAX 2067661825

BOEING

(E)
002



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

February 26, 1993

J. T. Johnston, P.E.
Boeing Defense & Space Group
The Boeing Company
PO Box 3999, M/S 89-18
Seattle, WA 98124-2499

Dear Mr. Johnston,

Confirmation of Exemption from PSAPCA O&M Plan Requirements for Fume Hoods and Ovens

Puget Sound Air Pollution Control Agency will not require record keeping regarding the operations and maintenance of fume hoods or ovens, unless a special condition or other regulatory requirement is imposed upon the specific fume hood or oven operation by this Agency. As you pointed out, the maintenance of the fume hood or oven has no net effect on limiting emissions to the atmosphere.

PSAPCA encourages your comments in these areas as we are truly interested in focusing and maximizing our efforts to minimize air pollution. We appreciate your comments and input, and we want to work with you to support your manufacturing productivity and our environmental goals.

Please call me at 689-4059 with any questions or comments you may have.

Sincerely,

Abigail C. Lee
Air Pollution Engineer

mj

cc: Robert Sloan, Environmental Engineer
Cathryn Carrothers, BD&SG Focal Contact
Pat Bachtel, Corp. SHEA
PSAPCA Inspectors

Anita J. Frankel, Air Pollution Control Officer

BOARD OF DIRECTORS

Chairman: Win Crankland, Commissioner, Kitsap County
Vice Chairman: Tim Hill, King County Executive
Peter Hurley, Councilman, Snohomish County

Fred Kirch, Mayor, Everett
Dorley Madenwald, Member at Large
Louis Menlor, Mayor, Breckenon

Norm Rice, Mayor, Seattle
Doug Suberland, Pierce County Executive
Karen Vialle, Mayor, Tacoma

110 Union Street, Suite 900, Seattle, Washington 98101-2038 (206) 343-8800 (800) 552-3565 FAX: (206) 343-7522