

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 11th day of August, 1983.

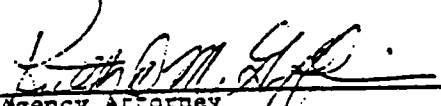
PUGET SOUND AIR POLLUTION CONTROL AGENCY

By 
Chairman

Attest:


Air Pollution Control Officer

Approved as to form:


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

- 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.

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 5 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 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

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Boeing
Plant 2 op from file

Clean Air
110 Union Street, Suite 500
Seattle, Washington 98101

Working Together For Clean Air

November 30, 1999

Ms Robin Bennett
The Boeing Company
PO Box 3707, MC 7A-XC
Seattle, WA 98124

Dear Ms Bennett:

Plant 2 Draft Air Operating Permit
Monitoring, Maintenance and Recordkeeping Requirements

This letter is in response to your letter of August 19, 1999 and subsequent inquiries by Tony Warfield of your office.

The Puget Sound Clean Air Agency has outlined monitoring, maintenance and recordkeeping requirements for work practices regulated under 40 CFR 63.744(a) *Housekeeping Measures* in the Plant 2 Draft Air Operating Permit. That requirement states:

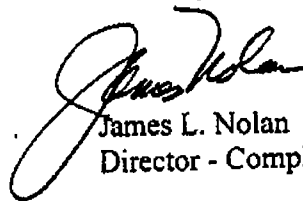
"Boeing shall correct any problem identified by these inspections as soon as possible, but within 24 hours of identification or shut down the unit or activity until the problem can be corrected. If Boeing observes problems for which there are no monitoring requirements under 40 CFR subpart GG, and corrects those problems within 24 hours, Boeing does not need to report the deviation under Section V.M. 2(b)."

It is our intention to include similar wording in all the operating permits for Aerospace NESHAP sources within our jurisdiction.

As for reporting for both the annual and semiannual Aerospace NESHAP reports, as long as the facility is complying with its internal O&M Plan that includes correcting housekeeping problems regulated under 40 CFR 63.744(a) within 24 hours of identification, we will consider the facility in compliance with 40 CFR 63.744(a).

I hope this clarifies our policy. If you have any questions, please call Jay Willenberg at (206) 689-4052.

Sincerely,


James L. Nolan
Director - Compliance

JLN:mj

cc: Aerospace Team

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Dennis J. McLerran

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Spray Coating
PSAPCA OCT 16 1998



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

OCT 14 1998

Reply To
Attn Of: OAQ-107

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



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

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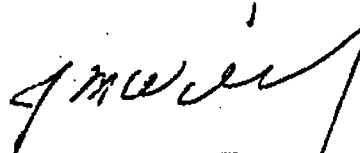
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40CFR 63.745(g) lists coating operation requirements in which any of the primers or topcoats that are "spray applied contain inorganic HAP". The section does not list a lower threshold for determining if a coating contains inorganic HAP. However it 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.

Attachment 5

APR 05 1999



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

APR 2 1999

Reply To
Attn 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 provide 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:ET: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

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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

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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 S. Kircher
Manager - Engineering

mj

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

Dennis J. McLerran, Air Pollution Control Officer

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**PUGET SOUND
Clean Air Agency**
119 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

EXECUTIVE DIRECTOR
Dennis J. McLerran

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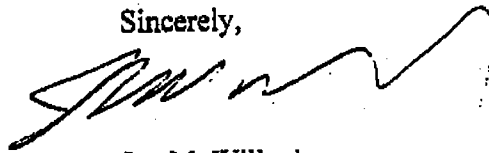
Thank you for your September 19, 2000 letter (A-1320-RGS-101) concerning the definition of "Mobile Equipment."

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@psccleanair.org.

Sincerely,



Jay M. Willenberg
Senior Engineer

JMW:mj

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

Ph 206.343.8800
1.800.552.3565
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www.pscleanair.org

Attachment 10

MAY 25 1999



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

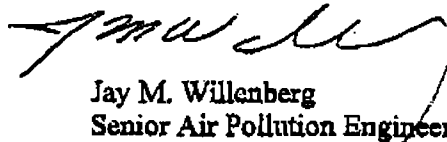
Thank you for letter dated March 10, 1999 (Letter No. E-1320-JTF-060) discussing using zero as a lower limit for the pressure differential range. Puget Sound Air Pollution Control Agency (PSAPCA) concurs that a lower pressure drop limit of zero is acceptable under certain conditions.

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

Dunnis J. McLarran, Air Pollution Control Officer

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April 17, 2001

Boeing Corporate
RECEIVED

Mr. Rick Hess
Puget Sound Clean Air Agency
110 Union Street, Suite 500
Seattle, WA 98101-2038

APR 23 2001

PUGET SOUND CLEAN
AIR AGENCY

Subject: Clarification of Contents of Operations and Maintenance Manual

Reference a) Letter from R. Hess, PSCAA to L. Babich, Boeing, December 22, 2001
Re: Applicability of Agency Regulation 1 Section 7.09(b)

b) Meeting of PSCAA and Boeing March 16, 2001 at PSCAA offices


Dear Mr. Hess:

We were happy to meet with you and the PSCAA team last month. With complex rules such as Aerospace NESHAP's, we appreciate your willingness to sit and discuss issues of interpretation and application of regulations. As Jim Nolan aptly stated, it is often a matter of nomenclature and terminology. Additionally, the application of rules needs careful consideration of the Company's operations. We strive for compliance at all times and know that this forum will help us to better understand how to apply and demonstrate compliance with the rules. We look forward to continued open dialogue.

We feel it is important to document the agreement we reached during the meeting regarding O&M plans. We agree that the overall goal is prevention of violations of the standards, such that equipment is operated and maintained to minimize emissions and operations are conducted in a compliant manner. There may be several different ways to achieve the intended goal; but in any case, it should be simple. At the meeting, we agreed that Boeing's Operating and Maintenance Plans will address only equipment operation and maintenance and that plans addressing the work practices of production workers can be maintained elsewhere. Should PSCAA inspectors encounter a systemic problem, they will want to see procedures and documentation addressing work practices to determine if a system was in place and where it appeared to have failed. This is reasonable and we will be glad to provide that documentation to them. However, this documentation will not be incorporated into the Operation and Maintenance Plan as described in PSCAA regulation I, Section 7.09 (b).

It is our intention to maintain site operations, as required, in full compliance with both the ANESHAP and PSCAA regulations concerning documentation. And, if you have any questions or would like to discuss this matter further please let me know. I can be reached at 206-766-1673.

Sincerely,


Barbara Thompson
Director of Environmental Affairs
Boeing Commercial Airplanes

CF Boeing Corporate



110 Union Street, Suite 500
Seattle, Washington 98101

Working Together For Clean Air

May 1, 2001

Barbara Thompson
Director of Environmental Affairs
Boeing Commercial Airplanes
P.O. Box 3707, M/C 21-77
Seattle, WA 98124-2207

Re: March 16, 2001 Office Conference

Dear Ms. Thompson:

Thank you for your April 17, 2001 letter that accurately reflected our meeting held on March 16, 2001.

We agree systemic problems identified or brought to the attention of our inspectors, will result in our request to review procedures and documentation addressing work practices to determine if a system is in place, as well as where it appeared to have failed. This process may also involve interviewing employees; we appreciate your cooperation.

Because an element of our civil penalty policy considers whether procedures were in place to prevent problems, understanding these systems and having documentation available during an inspection for review is beneficial to both parties.

Thank you for your action to ensure compliance with Agency regulations and for joining with this Agency in efforts to achieve cleaner air.

Should you have any questions, I can be reached at 206.689.4029.

Sincerely,

Rick D. Hess
Supervising Inspector

RDH/ml

cc: Jim Nolan, Director - Compliance
Neal Shulman, Manager - Inspection
Rosemary Busterna, Compliance System Planner
Aerospace Team

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cc: J. Nolan Puget Sound Clean Air Agency
N. Schulman Puget Sound Clean Air Agency

K. Thomson Boeing Shared Services Group - Environmental Affairs
M. Babich Boeing Commercial Airplanes -- 737/757 Programs SHEA
E. Cierebiej Boeing Commercial Airplanes -- Fabrication Division SHEA
D. Dornbush Boeing Aircraft and Missiles - Seattle Division SHEA
F. Migaiolo Boeing Commercial Airplane -- Everett Division SHEA

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

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

Let's discuss Barb's request.

James Nolan, Director-Compliance
 Puget Sound Clean Air Agency

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

-----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

**PUGET SOUND
Clean Air Agency**

110 Union Street, Suite 500
Seattle, Washington 98101

Working Together For Clean Air

*Boeing Comm Air
Return*

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

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Janet Chaloupek

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
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Boeing Corporate

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Working Together For Clean Air

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

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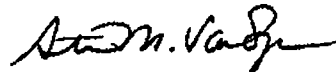
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or shops to the exhaust system which were previously not exhausted. If questions of applicability arise for specific scrubbers or baghouses that do not clearly fit this guidance, the Agency requires that Boeing contact the Agency directly to discuss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