

1 WASHINGTON DEPARTMENT OF ECOLOGY  
2 MAILSTOP 7600  
3 OLYMPIA, WASHINGTON 98504  
4

5 IN THE MATTER OF:

6  
7 Boeing Commercial Airplane Group ] DRAFT APPROVAL of RESCISSION of  
8 3003 W. Casino Rd. ] PSD 91-03 and  
9 Everett, WA 98203 ] PSD 91-05, INCLUDING  
10 ] AMENDMENTS 1 and 2  
11

12 Pursuant to the U.S. Environmental Protection Agency (EPA) regulations for the Prevention of  
13 Significant Deterioration (PSD) set forth in Title 40, Code of the Federal Regulations, Part 52  
14 and regulations set forth in the Washington Administrative Code 173-400-700 and based on the  
15 request submitted by Boeing Commercial Airplane Group on November 15, 2004 to rescind PSD  
16 91-03 and PSD 91-05 (including all amended versions) simultaneously with consolidation of  
17 approval conditions contained therein into Amendment 2 of PSD 91-06, Ecology now finds the  
18 following:

19 **FINDINGS**

- 20 1. PSD 91-03 allowed Boeing Commercial Airplane Group (Boeing) to build and established  
21 approval conditions affecting the operation of a new clean, seal, test and paint building  
22 designated Building 40-37 at the Everett facility (Boeing-Everett). The new building  
23 accommodated cleaning, sealing, testing and surface coating new Model 777 airplane wings,  
24 body sections and small parts. Ecology issued PSD 91-03 on July 10, 1991.
- 25 2. PSD 91-05 allowed Boeing to build and established approval conditions affecting the  
26 operation of two new corrosion inhibitor compound (CIC) emissions exhaust systems for  
27 coating Model 777 aircraft in Buildings 40-25 and 40-26 at Boeing-Everett. Boeing applied  
28 CIC at the Final Body Join and Final Assembly tool positions. Ecology issued PSD 91-05 on  
29 December 23, 1991.
- 30 a. On April 11, 1995 Boeing requested a change in Approval Condition 3 of PSD 91-05.  
31 The requested change was a reduction in specificity of coating application methodology  
32 which allowed increased operational flexibility while maintaining BACT. Ecology  
33 granted the final approval of PSD 91-05 Amendment 1 on May 17, 1995.
- 34 b. On June 14, 1999 Boeing requested a change in Approval Condition 2 of PSD 91-05.  
35 The requested change would allow Boeing to substitute other corrosion inhibiting  
36 coatings for the Dinitrol AV-8 and AV-30 (required in PSD 91-05 Amendment 1).
- 37 (1) BACT was maintained and there was no proposed increase in volatile organic  
38 compound (VOC) emissions allowed in Approval Condition 1 of PSD 91-05.
- 39 (2) Ecology granted the final approval of PSD 91-05 Amendment 2 on September 2,  
40 1999.
- 41 (3) Amendment 2 was the last amended version of PSD 91-05.

- 1 3. On November 15, 2004, Boeing submitted an application requesting consolidation of PSD  
2 91-03, PSD 91-05 Amendment 2, and PSD 91-06 Amendment 1 into PSD 91-06 Amendment  
3 2. Boeing requested that PSD 91-03 and PSD 91-05 be rescinded simultaneously with final  
4 and effective approval of PSD 91-06 Amendment 2.
- 5 4. Boeing-Everett qualifies as a major source because it emits more than 250 tons per year of  
6 volatile organic compounds (VOCs). VOCs are the surrogate pollutant emission species for  
7 ozone for determining major source status.
- 8 5. Boeing Everett is located in an area which is designated Class II for the purposes of PSD  
9 evaluation under 40 CFR 52.21 dated July 1, 1990.
- 10 6. Boeing-Everett is within an area which is currently designated as attainment relative to the  
11 state and national air quality standards for ozone.
- 12 7. The Code of Federal Regulations governing the PSD program allows a source to request  
13 rescission of a PSD permit (40 CFR 52.21(w)(2)).
- 14 8. There is no increase in allowable emissions resulting from the rescission of PSD 91-03 and  
15 PSD 91-05 (including all amended versions) because the VOC emission caps are  
16 consolidated in PSD 91-06 Amendment 2.
- 17 9. Public notice of the rescission of PSD 91-03 and PSD 91-05 (including all amended versions)  
18 is required under 40 CFR 52.21(w). Public notice will be made in conjunction with the notice  
19 for public review and comment for PSD 91-06 Amendment 2.
- 20 10. Ecology finds that all requirements for rescission of PSD permit Nos. PSD 91-03 and PSD  
21 91-05 (including all amended versions) have been satisfied. Ecology grants Boeing's request  
22 for rescission of PSD 91-03, PSD 91-05 (including all amended versions) subject to the  
23 following approval condition:

24 **Approval Condition:**

25 Immediately upon final and effective approval of PSD 91-06 Amendment 2, PSD 91-03 and PSD  
26 91-05 (including all amended versions) are rescinded.

27

28 Reviewed by:

29

30

31

32

33

34

Approved by:

\_\_\_\_\_  
Bernard Brady, P.E.  
Air Quality Program  
Washington Department of Ecology

\_\_\_\_\_  
Date

35

36

37

38

39

\_\_\_\_\_  
Stu Clark  
Manager, Air Quality Program  
Washington Department of Ecology

\_\_\_\_\_  
Date