



**PREVENTION OF SIGNIFICANT DETERIORATION (PSD) PERMIT**

<b>Issued To:</b>	The Boeing Company Boeing Commercial Airplane Group–Renton 737 Logan Avenue North Renton, Washington 98055
<b>Permit Number:</b>	<b>PSD 12-01, Amendment 2</b>
<b>Date of Issuance:</b>	<b>Proposed</b>
<b>Effective Date:</b>	

This PSD permit is issued under the authority of the Washington State Clean Air Act, Chapter 70.94 Revised Code of Washington; the Washington State Department of Ecology regulations for the Prevention of Significant Deterioration of Air Quality as set forth in Washington Administrative Code 173-400-700 through 750.

**PREPARED BY:**

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MengChiu Lim, P.E.  
Science and Engineering Section  
Air Quality Program

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Date

**APPROVED BY:**

\_\_\_\_\_  
Kathy Taylor, PhD  
Air Quality Deputy Program Manager  
Washington State Department of Ecology

\_\_\_\_\_  
Date

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## **PROJECT SUMMARY**

The Boeing Renton facility (Boeing Renton) applied to Ecology to make physical and operational changes that are different from the original manufacturing process configuration described in PSD 12-01, Amendment 1 in order to achieve the production capacity approved under PSD No.12-01, Amendment 1. This permit amendment is intended to update the design configuration to ensure that the information provided remains accurate.

Boeing Renton is located on Logan Avenue in an industrialized area of the city of Renton, adjacent to the Renton Municipal Airport. The facility is currently producing 737 Next Generation (NG) and 737 MAX-based airplanes. Operations at the facility include machining, part assembly, primer, topcoat and specialty coating application, solvent cleaning, and facility and equipment maintenance and support activities.

As part of the PSD 12-01, Amendment 2 application, Boeing Renton did not propose any new paint booths or any changes to the range of the materials anticipated to be used in the regulated activities that could increase VOC emissions. The proposed changes will not result in an increase of VOC emissions or the impact of those emissions that were already evaluated and permitted under PSD No. 12-01. Boeing Renton also did not propose any change to the existing permit conditions.

During 2013, Ecology issued PSD-12-01 to approve the changes that enable the facility to produce “737 MAX” airplanes and increase the production capacity. The 737 MAX project consists of two phases, which would result in a net emission increase of approximately 355.2 tons of VOC per year. Other regulated New Source Review (NSR) pollutants will not experience a significant emissions increase.

**Phase 1** of the project consists of two components. The first component involves making the changes at the facility to develop the production technology and capability for the 737 MAX model while maintaining production of existing models at levels up to approximately 504 airplanes per year (reconfiguration and relocation of existing equipment). This includes the addition of a new assembly line. The second component of Phase 1 would be an increase in overall production, utilizing the increased production capacity created in the first component of Phase 1 for the production of salable 737 MAX airplanes, and related emission increases.

Part of the physical changes will include moving wing systems from Building 4-81 and 4-82 into Buildings 4-20 and 4-21. In addition, both Phase 1 and Phase 2 of this project include the installation of new wing panel assembly tools and non-emission unit equipment (e.g., riveters), new spar assembly tooling and other assorted tooling and non-emission-unit equipment in Buildings 4-20 and 4-21. No new or modified spray booths are planned, and no other emission units would be added or modified in Buildings 4-20 and 4-21. The Phase 1 changes are physically and economically independent of the Phase 2 changes; the Phase 1 changes will be made regardless of whether or not the Phase 2 changes are made.

**Phase 2**, the second independent phase of this project, will be to make further changes to the facility with the intent of further increasing overall 737 production capacity of approximately 60 airplanes per month. The changes necessary to achieve this production rate would include creating additional wing assembly and painting capacity within the existing buildings, and increasing on-site final decorative coating capacity.

During 2015, Ecology issued PSD-12-01 Amendment 1 based on Boeing Renton's selection of option 2 for Phase 2 of the project which includes installation of up to three new vertical wing booths (PB5, PB6, and PB7), modification of up to three existing horizontal booths (PP5, PP6, and PP7), construction of up to three corrosion inhibiting compound booths (CB1, CB2, and CB3) in Building 4-86, and constructed one new decorative paint hangar with up to two bays (P-7/P-8).

Based on the PSD permit amendment request application submitted by Boeing Renton on December 21, 2017, and the Technical Support Document (TSD) prepared by Ecology dated June 22, 2018, Ecology finds that all requirements for issuance of this second amended PSD permit have been satisfied. Approval of the project described above is granted subject to the following conditions.

## **APPROVAL CONDITIONS**

### **I. EMISSION LIMITS**

#### **A. Federally Enforceable Limits**

1. Emissions of VOCs from the Boeing Renton facility must not exceed 750 tpy averaged on a 12-month rolling average.

#### **B. Phases of the 737 MAX Project**

1. Phase 1

Phase 1 is limited to reconfiguration and relocation of floor activities in Buildings 4-20, 4-21, 4-81, 4-82, and 4-86.

2. Phase 2

Phase 2 includes additional reconfiguration and relocation activities as well as the construction of:

Up to three new vertical wing booths (PB5, PB6, and PB7), up to three new CIC booths (CB1, CB2, and CB3) in Building 4-86, modifications of up to three existing horizontal booths (PP5, PP6, and PP7), and up to one new airplane decorative paint hangar with up to two bays (P-7/P-8).

**C. BACT Emission Limits**

1. For the new (PB5, PB6, PB7, CB1, CB2, CB3, P-7/P-8) and three modified emission units (PP5, PP6, and PP7), Boeing Renton must comply with all applicable VOC emission standards of the National Emission Standards for Aerospace Manufacturing and Rework Facilities, 40 CFR Part 63, Subpart GG (Aerospace NESHAP), as in effect on February 19, 2013..
2. VOC emissions from each new (PB5, PB6, and PB7) or modified vertical wing booths (PP5, PP6, and PP7) must not exceed 65.0 pounds (lb) per wing coated in Building 4-86 on a 12-month rolling average.
3. VOC emissions from each new CIC booth (CB1, CB2, and CB3) must not exceed 7.7 lb per wing coated in Building 4-86 on a 12-month rolling average.
4. VOC emissions from the new paint hangar (P-7/P-8) must not exceed 1,350 lb per plane coated on a 12-month rolling average.
5. As used in this PSD permit, VOC means any compound defined as VOC in 40 CFR § 51.100(s)

**II. SELECTION OF PHASE 2 OPTION**

Boeing Renton notified Ecology in a letter dated November 5, 2014, that Boeing Renton selected the Phase 2 option described in Section I.B.2. above.

**III. SPECIFIC OPERATING REQUIREMENTS**

- A. For cleaning and coating operations in the following new (PB5, PB6, PB7, CB1, CB2, CB3, P-7/P-8) and three modified emission units (PP5, PP6, and PP7), Boeing Renton must comply with all applicable VOC emission standards of the Aerospace NESHAP, 40 CFR Part 63, Subpart GG (as in effect on February 19, 2013), including but not limited to the following requirements, as applicable:
1. Cleaning solvent-laden cloth, paper, or any other absorbent applicators used for cleaning will be deposited in bags or other closed containers upon completing their use, to the extent required by 40 CFR § 63.744(a)(1).
  2. Fresh and spent cleaning solvents, except semi-aqueous solvent cleaners as defined in 40 CFR § 63.742 must be stored in closed containers to the extent required by 40 CFR § 63.744(a)(2).
  3. Conduct the handling and transfer of cleaning solvents to or from enclosed systems and other cleaning operation equipment that hold or store fresh or

- spent cleaning solvents in a manner that minimizes spills to the extent required by 40 CFR § 63.744(a)(3).
4. Hand-wipe cleaning solvents must comply with either Condition III.A.4.a. or Condition III.A.4.b. to the extent required by 40 CFR § 63.744(b).
    - a. A VOC composite vapor pressure not greater than 45 mm Hg at 20°C (determined in accordance with Condition III.B.3.); or
    - b. The composition requirements in Table 1 of 40 CFR § 63.744.
  5. To the extent required by 40 CFR § 63.744(d), when conducting flush cleaning operations subject to 40 CFR Part 63, Subpart GG (excluding those in which the cleaning solvents used either meet the composition requirements in Table 1 of 40 CFR § 63.744 or are semi-aqueous as defined in 40 CFR § 63.742), the Permittee shall empty the used cleaning solvent each time aerospace parts or assemblies, or components of a coating unit (with the exception of spray guns) are flush cleaned into an enclosed container or collection system that is kept closed when not in use or into a system with equivalent emission control.
  6. The VOC content level in primers and topcoats must meet the following requirements:
    - a. Exterior primers: Not greater than 5.4 lb VOC/gal, as applied, less water and exempt solvents to the extent required by 40 CFR § 63.745(c)(2).
    - b. All other primers: Not greater than 2.9 lb VOC/gal as applied, less water and exempt solvents to the extent required by 40 CFR § 63.745(c)(2).
    - c. Topcoats: Not greater than 3.5 lb VOC/gal, as applied, less water and exempt solvents to the extent required by 40 CFR § 63.745(c)(4).
  7. To the extent required by 40 CFR § 63.745(f)(1), spray-applied primers and topcoats for wings must be applied using High Volume Low Pressure (HVLP), electrostatic, or other spray coating application methods, as approved by Ecology and/or the Puget Sound Clean Air Agency (PSCAA), as specified in Condition IX.A., with a transfer efficiency equivalent to or greater than HVLP or electrostatic spray application methods.
  8. To the extent required by 40 CFR § 63.744, spray guns and hoses will be cleaned by one or more of the methods specified in Conditions III.A.8.a. through III.A.8.d., or equivalent methods that are approved by Ecology and/or PSCAA, as specified in Condition IX.A.:

- a. Enclosed system – to the extent required by 40 CFR § 63.744(c)(1):
    - i. Clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place.
    - ii. Cleaning must consist of forcing solvent through the gun.
  - b. Nonatomized cleaning – to the extent required by 40 CFR § 63.744(c)(2):
    - i. Clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place.
    - ii. No atomizing air is to be used.
    - iii. Direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use.
  - c. Disassembled spray gun cleaning – to the extent required by 40 CFR § 63.744(c)(3):
    - i. Disassemble the spray gun and clean the components by hand in a vat, which must remain closed at all times except when in use; or
    - ii. Soak the components in a vat, which must remain closed during the soaking period and when not inserting or removing components.
  - d. Atomized cleaning – to the extent required by 40 CFR § 63.744(c)(4):
    - i. Clean the spray gun by forcing the cleaning solvent through the gun.
    - ii. Direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.
- B. In addition to complying with the VOC emission standards of the Aerospace NESHAP, 40 CFR Part 63, Subpart GG (as in effect on February 19, 2013) as required in Condition III.A., all wing cleaning solvents or solvent blends applied in all the booths must be applied either manually or by low pressure applicators except in the following situations:
- 1. Cleaning intricate surfaces;
  - 2. Where access is limited to the extent that using a low pressure applicator is infeasible; or

3. Use of a cleaning solvent that either meets the composition requirements in Table 1 of 40 CFR § 63.744 or meets the definition of a semi-aqueous cleaning solvent as defined in 40 CFR § 63.742 (as in effect on February 19, 2013).

#### **IV. COMPLIANCE MONITORING REQUIREMENTS**

Boeing Renton must monitor compliance with Conditions I.A., I.C.2, I.C.3., and I.C.4. beginning the first calendar month after the effective date of this permit. Boeing Renton must:

- A. No later than 30 days after the end of each month, quantify the amount in pounds of each material that contains VOCs in each building or activity identified in Approval Condition I.A. and each booth identified in Approval Condition II.C.
- B. Determine VOC mass fractional concentration of each such VOC-containing material from the corresponding Material Safety Data Sheets (MSDSs) or other data supplied by the material's manufacturer or by another method approved by Ecology and/or PSCAA, as specified in Condition IV.A.
- C. Calculate VOC emissions for that month as follows:

Multiply each material's total weight, Condition IV.A. by its VOC mass fractional concentration, Condition IV.B., to determine the VOC emissions from that material. Calculate total VOC emissions from all VOC-containing materials consumed in that spray booth or hangar by summing those emissions for all the materials used in that spray booth or hangar for that month. Boeing Renton may subtract:

1. Any VOCs that are included in the coating formulation as reactive components to the extent that they are incorporated into the coating, or
  2. Any VOC containing materials captured from that spray booth or hangar for recycling or disposal; or discharged from Boeing Renton to wastewater or solid waste using the methods described in a written plan that is pre-approved by PSCAA or Ecology.
- D. Calculate VOC emissions from new or modified emission units identified in Condition I.C. in pounds for the most recent 12-month period as follows:

Add total VOC emissions obtained per Condition IV.C. to the total VOC emissions from that spray booth or hangar for the previous eleven (11) months to obtain the 12-month rolling average VOC emissions. For the purpose of this calculation, the amount of each VOC-containing material used in the spray booth

or hangar during the eleven (11) months preceding the first month in which any of the new or modified spray booth or hangar is first used shall be considered zero.

- E. Quantify the total number of wings coated in the new or modified CIC wing spray booths in Building 4-86 in the most recent 12-month period. Verify compliance with Condition I.C.3. by dividing the sum of the values obtained per Condition IV.D for those booths by the total number of wings coated in those booths for the 12-month period.
- F. Quantify the total number of wings coated in the new or modified vertical wing spray booths in Building 4-86 in the most recent 12-month period. Verify compliance with Condition I.C.2. by dividing the sum of the values obtained per Condition IV.D for those booths by the total number of wings coated in those booths for the 12-month period.
- G. Quantify the total number of airplanes coated in the new paint hangar in the most recent 12-month period. Verify compliance with Condition I.C.4. by dividing the value obtained per Condition IV.D. by the total number of airplanes coated in the new paint hangar for that 12-month period.
- H. Boeing Renton must use methods consistent with the facility's reporting under WAC 173-400-105(1) Emissions inventory.

## **V. RECORDKEEPING AND REPORTING REQUIREMENTS**

- A. Boeing Renton must keep records of each monitoring requirement identified in Approval Condition IV. Each record must specify the origin of the emissions (e.g., CIC Booth #1 in Building 4-86).
- B. Records must be retained for not less than five years. At a minimum, the last two years of records must be kept on-site (or electronically accessible).
- C. All records must be available for Ecology or PSCAA inspection. Off-site records must be made available to Ecology or PSCAA within 10 days of the request.
- D. Permittee must annually report in writing or electronic mail, postmarked or received by June 15 of each year, the following information to Ecology and/or PSCAA, as specified in Condition VI.A.:
  - 1. The average pounds of VOC emissions per wing coated in each new or modified CIC wing spray booth in Building 4-86 for the reporting year.
  - 2. The average pounds of VOC emissions per wing coated in each new or modified vertical wing inspar booth in Building 4-86 for the reporting year.

3. The average pounds of VOC emissions per airplane coated in the new two position paint hangar (P-7/P-8) for the reporting year.
4. The total tons of VOC emissions from the Boeing Renton facility for the reporting year.

## **VI. EFFECTIVE DATE OF PERMIT**

In accordance with CFR § 124.15 and § 124.19, and WAC 173-400-730, the effective date of this PSD permit is one of the following dates:

- A. If no comments requesting a change in the preliminary determination were received: the date of issuance; or
- B. If comments requesting a change in the preliminary determination were received: thirty (30) days after the applicant and commenter(s) receive the final determination; or
- C. If a review of the final determination is requested pursuant to 40 CFR § 124.13 and 40 CFR § 124.19, the effective date of the permit is suspended until such time as the review and any subsequent appeal against the permit are resolved.

## **VII. PERMIT EXPIRATION**

Pursuant to 40 CFR § 52.21(r)(2), and unless an extension is granted by Ecology prior to expiration, this PSD permit will become invalid if construction is discontinued for a period of eighteen (18) months or more; or is not completed within a reasonable time.

## **VIII. CONSTRUCTION TIME LIMITATIONS**

- A. In accordance with WAC 173-400-730(5):
  1. Approval to construct or modify a major stationary source becomes invalid if construction is not commenced within eighteen (18) months of the effective date of the approval, if construction is discontinued for a period of eighteen (18) months or more, or if construction is not completed within a reasonable time. The time period between construction of the approved phases of a phased construction project cannot be extended. Each phase must commence construction within eighteen (18) months of the projected and approved commencement date.
  2. Ecology may extend the eighteen-month effective period of a PSD permit upon a satisfactory showing that an extension is justified. A request to extend the effective time to begin or complete actual construction under a PSD permit may be submitted. The request may result from the cessation of on-site construction

before completion or failure to begin actual construction of the project(s) covered by the PSD permit.

a. Request requirements

- i. A written request for the extension, submitted by the PSD permit holder, as soon as possible prior to the expiration of the current PSD permit.
- ii. An evaluation of BACT and an updated ambient impact, including an increment analysis, for all pollutants subject to the approval conditions in the PSD permit.

b. Duration of extensions

- i. No single extension of time shall be longer than eighteen (18) months.
- ii. The cumulative time prior to beginning actual construction under the original PSD permit and all approved time extensions shall not exceed fifty-four (54) months.

c. Issuance of an extension

- i. Ecology may approve and issue an extension of the current PSD permit.
- ii. The extension of approval shall reflect any revised BACT limitations based on the evaluation of BACT presented in the request for extension and other information available to Ecology.
- iii. The issuance of an extension is subject to the public involvement requirements in WAC [173-400-740](#).

- d. For the extension of a PSD permit, Ecology must prepare a TSD consistent with WAC [173-400-730](#)(3) only to the extent that those criteria apply to a request to extend the construction time limitation.

## **IX. PERMIT NOTIFICATION REQUIREMENTS**

- A. Boeing Renton’s requirements in this PSD permit to notify, report to, or acquire approval or agreement from “Ecology and/or the PSCAA” may be satisfied by providing such notification, reporting, or approval request to PSCAA if the conditions of this PSD permit have been incorporated into Boeing Renton’s Title

V Air Operating Permit (AOP) issued pursuant to 40 CFR Part 70 and Chapter 173-401 WAC.

- B. Boeing Renton must notify Ecology and PSCAA in writing or electronic mail of the date construction is commenced, postmarked, or received within thirty (30) days of such date.

**X. MALFUNCTION AND EXCESS EMISSION REPORTING**

- A. Prior to incorporation of the conditions of this PSD permit into Boeing Renton's Title V AOP issued pursuant to 40 CFR Part 70, Boeing Renton must report to Ecology and PSCAA, in writing or electronic mail, following the discovery of any malfunction of air pollution control equipment, process equipment, or of a process, which results in an increase in VOC emissions above the allowable emission limits specified in Condition I. of this permit, in accordance with WAC 173-400-107 and the following conditions:

1. As used in WAC 173-400-107(3), "as soon as possible" shall mean in no case later than twelve (12) hours following the discovery of any occurrence of excess VOC emissions above the allowable emission limits stated in Approval Condition I. of this permit that represent a potential threat to human health or safety.
2. Boeing Renton must notify Ecology and PSCAA, in writing or electronic mail, postmarked or received within thirty (30) days after the end of the month in which a malfunction is discovered, for any malfunction of air pollution control equipment, process equipment, or of a process, which results in VOC emissions above the allowable emission limits stated in Section I. of this permit. This notification must include a description of the malfunctioning equipment, process equipment or process, the date and time of the initial malfunction (if known), the period of time over which emissions were increased due to the malfunction, the cause of the malfunction (if known), the estimated resultant emissions in excess of those allowed in Section I. and the methods utilized to mitigate emissions and restore normal operations.
3. For purposes of this Condition, "malfunction" means any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner.

- B. After the conditions of this PSD permit have been incorporated into Boeing Renton's Title V AOP issued pursuant to 40 CFR Part 70, Boeing Renton shall report to PSCAA the discovery of any malfunction of air pollution control equipment, process equipment, or of a process, which results in an increase in VOC emissions above the allowable emission limits specified in Condition I. of this permit pursuant to the deviation reporting requirements and, if applicable,

pursuant to the unavoidable excess emissions reporting requirements of that Title V AOP.

- C. Compliance with the malfunction notification requirements of Conditions IX.A. or IX.B., as applicable, will not excuse or otherwise constitute a defense to any violation of this PSD permit or any law or regulation such malfunction may cause.

## **XI. RIGHT OF ENTRY**

Section 114 of the federal Clean Air Act, 42 U.S.C. § 7414, the Revised Code of Washington (RCW) 70.94.200, and WAC 173-400-105(3) provide authorized representatives of EPA, Ecology, and PSCAA certain rights to enter and inspect the source. Refusal by Boeing Renton to allow such entry and inspection may be a violation of the federal Clean Air Act and/or the RCW subject to penalty as provided in those statutes. Pursuant to these statutes, authorized representatives of EPA, Ecology, and PSCAA, upon the presentation of credentials:

- A. Have a right of entry to, upon, or through any premises of Boeing Renton or any premises in which any records this permit requires the Permittee to maintain are located.
- B. Have the right, at reasonable times, to access and copy any records this permit requires Boeing Renton to maintain.
- C. Have the right, at reasonable times, to inspect any monitoring equipment or method required by this permit.
- D. Have the right, at reasonable times, to sample any emissions that Boeing Renton is required to sample under this permit.

## **XII. ADHERENCE TO APPLICATION AND COMPLIANCE WITH OTHER ENVIRONMENTAL LAWS**

- A. Pursuant to 40 CFR § 52.21(r)(1), Boeing Renton must construct and operate the new and modified spray booths and hangar in accordance with this PSD permit and the application on which this permit is based.
- B. Pursuant to 40 CFR § 52.21(r)(3), this PSD permit shall not relieve Boeing of the Renton responsibility to comply fully with applicable provisions of the State Implementation Plan and any other requirements under local, state, or federal law.
- C. Any applicant who fails to submit any relevant facts or who has submitted materially incorrect relevant information in a permit application must, upon becoming aware of such failure, or incorrect submittal, promptly submit such supplementary facts or corrected information.

- D. To the extent provided by 40 CFR § 52.12(c), for the purpose of establishing whether or not Boeing Renton has violated or is in violation of any requirement of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether Boeing Renton would have been in compliance with applicable requirements if the appropriate performance or reference test or procedure had been performed.

### **XIII. APPEAL PROCEDURES**

This PSD permit, or any conditions contained in it, may be appealed to:

- A. The Pollution Control Hearings Board (PCHB) as provided in Chapter 43.21B RCW and Chapter 371-08 WAC; and/or

## ACRONYMS AND ABBREVIATIONS

BACT	Best Available Control Technology
Boeing Renton	The Boeing Company, Boeing Commercial Airplanes Renton Facility
CFR	Code of Federal Regulations
CB	Corrosion Inhibitor Compound Booth
EAB	Environmental Appeals Board
Ecology	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
gal	gallon(s)
HVLP	High Volume Low Pressure
lb	pound(s)
MSDS	Material Safety Data Sheet
NESHAP	National Emission Standards for Hazardous Air Pollutants
PCHB	Pollution Control Hearings Board
PSCAA	Puget Sound Clean Air Agency
PSD	Prevention of Significant Deterioration
RCW	Revised Code of Washington
tpy	tons per year
U.S.C.	United States Code
VOC	volatile organic compound
WAC	Washington Administrative Code