

University Swaging

A PCC COMPANY

June 20, 2024

Puget Sound Clean Air Agency
1904 3rd Avenue #105
Seattle, WA 98101

Attn: Ms. Maggie Corbin

Dear Ms. Corbin,

In accordance with Reg I Section 3.03, University Swaging respectfully requests a limit on its hazardous air pollutant emissions below major source thresholds, as stipulated by WAC 173-400-091. Our potential emissions of all criteria pollutants are currently below major source thresholds, with the exception of n-propyl bromide, which has recently been listed by the EPA as a hazardous air pollutant.

Enclosed, please find the emissions calculations and supporting documentation from all emission sources at our facility, including spray coating, cold solvent cleaning, and vapor degreasing operations. These calculations demonstrate that University Swaging can limit its facility-wide emissions of hazardous air pollutants (HAPs) to less than 9.5 tons of any single HAP, 24.5 tons of all HAPs combined, and 49.5 tons of volatile organic compounds (VOCs) within any 12-month period, as established by 42 U.S.C. 7412(b)(1) and amended in 40 CFR Part 63 Subpart C Section 112(b).

Furthermore, as discussed previously, University Swaging plans to replace the current vapor degreaser solvent containing n-propyl bromide with an alternative solvent that does not contain hazardous air pollutants. This new solvent is pending approval from Boeing, with an expected completion date at the end of 2024. Once approved, we will notify the Puget Sound Clean Air Agency, obtain the necessary approvals, and proceed with the solvent replacement.

Should you have any questions or require additional information, please don't hesitate to contact me at Tufan.Yasar@pccairframe.com or (206) 423-6821. Thank you for your assistance, and I look forward to your response.

Respectfully,



Tufan Yasar
Senior EHS Manager PCC Airframe Products
Email: Tufan.Yasar@pccairframe.com
Phone #: (206) – 423-6821

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Signature Approval

Jimmy Hansen, General Manager for University Swaging



Signature



Date