

Boeing Seattle AOP #21147 Renewal Application

40 CFR Part 64 Compliance Assurance Monitoring

Under 40 CFR Part 64, as part of the AOP renewal application, Boeing Seattle is required to submit a Compliance Assurance Monitoring (CAM) Plan to the Puget Sound Clean Air Agency for any emission unit that meets the following criteria:

1. The unit is subject to an emission limitation or standard for the applicable regulated air pollutant. [40 CFR 64.2(a)(1)]
2. The unit uses a control device to achieve compliance with any such emission limitation or standard. [40 CFR 64.2(a)(2)]
3. The emission limitation or standard is not otherwise exempt from the CAM rule, such as by a new source performance standards (NSPS) or national emission standards for hazardous air pollutants (NESHAP) proposed after November 15, 1990, or stratospheric ozone requirements. [40 CFR 64.2(a)(4)]
4. The unit has potential pre-control device emissions of the applicable pollutant of at least 100% of the major source amount. [40 CFR 64.2(a)(3)]

Emission units at Boeing Seattle that met the first three criteria listed above were evaluated to determine if their potential pre-control device emissions exceeded the major source amount (100 tons per year for particulate). In no case did the estimate of potential pre-control device emissions exceed the major source threshold. The table on the following pages identifies the specific emission units evaluated, and includes the limitation or standard applicable to the emission unit as well as the type of air pollution control device that is used to achieve compliance. It should be noted that there are emission units at Boeing Seattle other than those listed in the table that may also satisfy the first three criteria listed above (primarily small dust collectors), but which are exempt from the requirement to obtain an Order of Approval under Puget Sound Clean Air Agency Article 6 due to their de minimis impact on air quality. On this basis, and based on our emissions calculations for similar units which have been issued Orders of Approval, these units are estimated to have pre-control potential emissions well below the major source threshold.

Attachment – Form C Part 1 – CAM Analysis
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Bldg.	Col./Dr.	MSS ID#	Source Description	Emission limitation or standard other than exempt limitations and standards for the applicable regulated air pollutant	Control device to achieve compliance with any such emission limitation or standard	Does the unit have the potential pre-control device emissions > 100% of the tpy amount to be classified as a major source?
				40 CFR 64.2 (a)(1)	40 CFR 64.2(a)(2)	40 CFR 64.2(a)(3)

Coating, Cleaning, and Depainting Operations

2-10	G.5/15	PB5002	Spray Booth	PM: 0.05 gr/dscf*	Dry Filters	No
3-380	C13	PB5008	Spray Booth	PM: 0.05 gr/dscf*	Dry Filters	No
2-122	Q5	PB0018	Spray Coating Booths - Dry Filter	PM: 0.05 gr/dscf*	Dry Filters	No
2-122	I6	PB0001	Spray Coating Booths - Dry Filter	PM: 0.05 gr/dscf*	Dry Filters	No
2-122	H6	PB0003	Spray Coating Booth - Dry Filter	PM: 0.05 gr/dscf*	Dry Filters	No
3-370	B3	PB5009	Spray Booth	PM: 0.05 gr/dscf*	Dry Filters	No
2-88		PB9006	Spray Coating Booth - Dry Filter	PM: 0.05 gr/dscf*	Dry Filters	No
3-369		P3 P4	Paint Hangar	PM: 0.05 gr/dscf*	Dry Filters	No
3-380		P5 P6	Paint Hangar	PM: 0.05 gr/dscf*	Dry Filters	No

Abrasive Blast, Cyclones, Baghouses, and Other Particulate Control Operations

2-88	O/S Door W6	DUC7460	Dust Collector	PM: 0.05 gr/dscf*		No
3-369		DUC369	Dust Collector	PM: 0.05 gr/dscf*		No
2-10	G15	SND511	Blast booth/Baghouse	PM: 0.05 gr/dscf*	Baghouse	No

Chemical Process Tankline Operations

There is one chemical process tankline scrubbers that removes PM and other pollutants. Uncontrolled emissions are less than 100 TPY; therefore, the tankline scrubbers are not subject to the CAM Plan requirements.

*@ 7% O₂