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Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

REF: Boeing Comments on June 17, 2017 Proposed Pennsylvania Industrial Solvent Cleaning Rule (25 Pa. Code 129.63a)

Dear Environmental Quality Board Members,

The Boeing Company operates a large rotorcraft manufacturing facility in Ridley Park, Pennsylvania, in the Philadelphia metropolitan area. Boeing employs over 4000 people at this facility, and relies on over 500 suppliers and vendors located in Pennsylvania.

The Ridley Park facility is subject to the solvent cleaning requirements of the Aerospace National Emission Standard for Hazardous Air Pollutants [40 CFR 63, Subpart GG, §63.744] and the Pennsylvania Aerospace Manufacturing and Rework VOC control rule [25 PA Code §129.73 (7)-(11)]. These aerospace-specific regulations cover a full range of solvent cleaning activities (other than vapor degreasers and cold cleaners, which are regulated separately). These rules impose solvent content and housekeeping measures on solvent cleaning prior to surface coating and paint gun cleaning, but also regulate emissions from hand wipe cleaning and flush cleaning for other purposes not directly associated with surface coating.

The general Industrial Solvent Cleaning rule proposed as 25 Pa. Code 129.63a in the June 17, 2017 Pennsylvania Bulletin would exempt:

(c)(1)(ii) An owner or operator of a cleaning unit operation associated with a following category:

(A) Aerospace coatings.

Our concern is that the term "aerospace coatings" could be interpreted to limit the exemption to aerospace solvent cleaning activities associated with "coatings" only. This reading would be contrary to the Aerospace CTG, the Industrial Solvent Cleaning CTG, and the Pennsylvania Aerospace VOC rule. The CTGs and the Pennsylvania Aerospace VOC rule indicate that aerospace solvent cleaning should be regulated by a VOC rule that is specific to aerospace cleaning requirements, not by a general Industrial Solvent Cleaning VOC rule.



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The Pennsylvania aerospace VOC rule §129.73 is titled "Aerospace Manufacturing and Rework." To avoid future confusion, we suggest that the final Industrial Solvent Cleaning rule use this term to describe the exemption for the aerospace source category, as follows:

- (c)(1)(ii) An owner or operator of a cleaning unit operation associated with a following category:
 - (A) Aerospace coatings manufacturing and rework.

We look forward to providing any needed additional clarification or engagement on this issue. Our point of contact is David Shanks, at david.l.shanks@boeing.com, (314) 703-6132.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Shestak".

Steve Shestak
Director, Environment
Environment, Health and Safety

cc: Michael Corrigan, Manager
Government Operations, East Region