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May 13, 2011

Clerk's Office  
Illinois Pollution Control Board  
James R. Thompson Center, Suite 11-500  
100 W. Randolph St.  
Chicago, IL 60601

PC# 3



Ref: Docket R11-23, VOM Standards for the Metro East Area

Pollution Control Board Members:

The Boeing Company recently opened a small manufacturing facility near Mascoutah, Illinois, which is located in the metro east ozone nonattainment area. This is our first Boeing manufacturing operation in Illinois. We look forward to bringing additional aerospace work to Illinois, both directly and through promoting a local supplier network, but see some limitations because Illinois VOM rules did not anticipate aerospace manufacturing in metro east.

Ordinarily, in an ozone nonattainment area, we would be regulated by an Aerospace VOM RACT rule, usually based on the US EPA Control Techniques Guideline (CTG) for Aerospace Manufacturing and Rework. However, Illinois does not have an Aerospace VOM RACT rule. On October 11, 1996, Illinois EPA submitted a negative declaration to US EPA, saying that an Aerospace RACT rule was not needed at that time, because metro east did not have any aerospace facilities with potential to emit greater than the Aerospace CTG applicability threshold. Consistent with our hope to increase aerospace manufacturing in Illinois, we intend to petition Illinois to consider adopting an aerospace RACT rule and/or amendments to existing rules to clarify applicability of metro east VOM rules to aerospace. We will do so under separate cover, with more detail. However, a potentially applicable solvent cleaning VOM rule is proposed for revision and open for comment now, so we are submitting comment on that proposal to ensure timely consideration.

On April 1, 2011, the Illinois Register published proposed revisions to 35 Ill. Adm. Code 219.187, entitled "Other Industrial Solvent Cleaning Operations." Section 219.187(a)(2)(B) exempts certain cleaning operations that are covered by other industry-specific RACT rules. The existing exemption for cleaning associated with "i) aerospace coating" is proposed for deletion. Boeing requests that this deletion be deferred until such time that aerospace solvent cleaning operations can be subject to a regulation that is RACT for aerospace manufacturing.

If the aerospace exemption at Section 219.187(a)(2)(B) i) is deleted and we increase manufacturing activity to exceed the proposed 500 lb/month solvent cleaning threshold, the Boeing facility would be subject to a rule that does not represent presumptive RACT, as described in the Aerospace CTG<sup>1</sup>. The Other Industrial Solvent Cleaning rule would require solvents to meet a 0.42 lb/gal VOM limit and also an 8 mm Hg vapor pressure limit. By way of comparison, CTG-based aerospace rules in most ozone nonattainment areas in the U.S. provide the following options for aerospace solvent cleaning:

- Use aqueous cleaning solvent
- Use a low vapor pressure (7 mm Hg or less) hydrocarbon-based solvent. There is no lb/gal VOM content requirement.
- Use a solvent with vapor pressure of 45 mm Hg, but follow housekeeping measures, such as placing solvent wipes in bags or other closed containers upon completing their use. There is no lb/gal VOM content requirement.

There are limited aerospace applications where aqueous or 7 mm Hg vapor pressure solvents are effective, but most aerospace solvent cleaning in the U.S. is performed with solvent blends that meet the 45 mm Hg vapor pressure limit described in the Aerospace CTG and the Aerospace NESHAP. Also, some Aerospace RACT rules exempt cleaning with cotton-tipped swabs for small areas, a common practice at our metro east facility.

Please retain the aerospace exemption in Sec. 219.187(a)(2)(B) during this rulemaking cycle. We will follow up with a separate rulemaking petition regarding an Aerospace RACT rule for metro east and a request for interim determination of RACT rule applicability, understanding that rulemaking does take some time to complete. Feel free to contact me at (314) 777-9227 or david.l.shanks@boeing.com, if further information would be helpful.

Sincerely,



David Shanks  
Boeing Environmental Policy Analysis  
Boeing St. Louis

cc: Mark Schlueter, Illinois EPA, 2009 Mall St., Collinsville, IL 62234

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<sup>1</sup> The Aerospace CTG is available at <http://www.epa.gov/airtoxics/aerosp/ctg.pdf>