

Boeing Commercial Airplanes  
P.O. Box 3707, MC 9U2-01  
Seattle, WA 98124-2207

Ms. Karen Baldwin  
Commercial/Industrial Unit Manager  
Air Quality Program - Eastern Regional Office  
Washington State Department of Ecology  
4601 N. Monroe St  
Spokane, WA 99205-1295



August 31, 2020

Subject: Three Applications for Operating Non-road Engines Cumulatively >2000 Brake Horsepower: Intent to Operate

Dear Ms. Baldwin,

The Boeing Company (Boeing) is pleased to submit an Application for Operating Non-road Engines Cumulatively >2000 Brake Horsepower: Intent to Operate for each of its three aircraft storage facilities at the Grant County International Airport (GCIA) in Moses Lake. The three separate facilities that are used to store aircraft are:

- Facility 1: Boeing-owned property and nearby (leased) Compass Rose area to the west of Boeing-owned property
- Facility 2: ASPI-owned leased property
- Facility 3: Port of Moses Lake property (four leased areas)

Boeing is proposing the use of portable generators from approximately October 2020 to June 2021 to heat/dehumidify the 737 MAX airplanes stored at each of these aircraft storage facilities. The storage of 737 MAX aircraft during cold weather requires that the aircraft engines and fuselages be temperature/humidity-controlled to maintain them in good condition. Boeing is proposing that the required aircraft heating/dehumidification would be accomplished by using Tier 4-certified portable diesel generators, each rated at up to approximately 171 brake horsepower (BHP). Although Boeing expects to use two different sizes of Tier 4 certified portable generators for this purpose – approximately 100 BHP and 171 BHP -- relevant sections of the applications and the NAAQS modeling conservatively assume that all portable generators used to heat/dehumidify airplanes will be 171 BHP (and will be run 8,760 hours per year).

As requested in Section IV of the applications, Boeing has completed air dispersion modeling for the proposed projects. Conservatively, the three projects were modeled in a single modeling run. The modeling results show that the potential impacts from the operation of the portable generators together with background concentrations from NW AIRQUEST do not indicate any NAAQS exceedance.

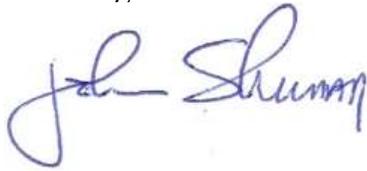
In Section V of each application, Boeing has included total brake horse power and the specifications for the portable generators planned for use at each of the three facilities. Because the portable generators have not yet been dispatched from the Herc Rentals' yard to the three aircraft storage facilities, Boeing is unable to provide serial numbers or other engine-specific information at this time. Furthermore, portable generators are routinely taken off-site for periodic maintenance or repair at the Herc Rentals yard, making it impractical for Boeing to keep an accurate inventory of generator serial numbers by facility. Any list of portable generators by site would only represent a snapshot in time.

Air dispersion modeling performed with these conservative assumptions (the single modeling run, the use of only 171 BHP generators, running 8,760 hours per year) demonstrate that the applicable NAAQS will not be exceeded.

As requested in the application, a SEPA checklist for the proposed project (use of portable generators at three aircraft storage facilities at GCIA) has been completed and was submitted to Ecology on August 27, 2020.

Should you have any questions, please feel free to contact me at 253-218-5053 or [johnathan.w.sherman@boeing.com](mailto:johnathan.w.sherman@boeing.com).

Sincerely,

A handwritten signature in blue ink that reads "John Sherman". The signature is written in a cursive, flowing style.

John Sherman  
Senior Manager, EHS - Environment  
737 Airplane Program