

Boeing Commercial Airplanes
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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



June 29, 2022

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-owned property (four leased areas)

Boeing is proposing the use of portable generators from approximately October 2022 to June 2023 to heat/dehumidify airplanes stored at each of these aircraft storage facilities. The storage of aircraft during cold weather requires that the aircraft engines and fuselage interiors be temperature/humidity-controlled to maintain them in good condition. Boeing is proposing that the required aircraft heating/dehumidification would be accomplished, as ambient conditions require, by using Tier 4-certified portable diesel generators, each rated at up to approximately 171 brake horsepower (BHP).

Boeing has focused on continuing to reduce the potential air quality impacts by decreasing the number of generators in use over time. In particular, Boeing conducted an engineering study that evaluated ways to configure equipment and processes to meet strict temperature and humidity requirements on airplanes in storage with the use of fewer generators. The study revealed that with the use of desiccant, the right balance of support equipment and other measures, a single portable generator could adequately maintain up to 3 airplanes in storage. Additionally, Boeing implemented a large capital expenditure project to install shore power on the flight line at Facility 1 to further significantly reduce portable generator use. These efforts, in addition to ongoing airplane deliveries to customers, have resulted in a greater than two-thirds overall reduction of portable generators included in our applications compared to previous years.

Section IV of each application requires air dispersion modeling for the proposed projects. Boeing has submitted air dispersion modeling analyses required by the application process to the Washington State Department of Ecology (Ecology) in 2019, 2020 and 2021. The modeling results show that the use of portable generators to supply power to control the temperature/humidity of the stored airplanes would not exceed the National Ambient Air Quality Standards (NAAQS) for 1-hour carbon monoxide (CO), 8-hour CO, annual nitrogen dioxide, 24-hour particulate matter with diameters that are 2.5 micrometers and smaller (PM2.5), annual PM2.5, 24-hour particulate matter with diameters that are 10 micrometers and smaller (PM10), and annual PM10.

Boeing is not submitting additional modeling analyses to Ecology as the previous modeling demonstrations included conservative assumptions as outlined below.

- The modeling assumed 24 hours per day/7 days per week /365 days per year continuous year-round operation of the portable generators. Boeing is proposing to use the portable generators only from approximately October 2022 to June 2023, and, during this period, those generators are generally not expected to run continuously in order to heat/dehumidify the airplanes. Thus, the modeled operation of the portable generators is much more intense than the actual operations.
- Boeing generally uses two different sizes of Tier 4 certified portable generators – approximately 95 brake horsepower (BHP) and 171 BHP. For the 2021-2022 heating cycle, greater than 50% of the portable generators used were the smaller 95 bhp units. The modeling analysis conservatively assumed that only 171 BHP portable generators will be used, as a worst case, and actual emissions and impacts are therefore significantly less.

In addition, as the total number of airplanes in storage at the three facilities is further reduced, so will the ambient air impacts of emissions of NAAQS pollutants from the portable generators.

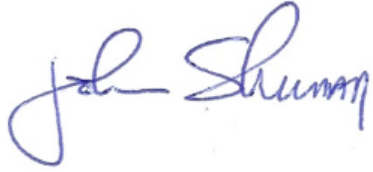
Because of the conservative assumptions used in the previous modeling analyses and the decreased use of portable generators, potential air quality impacts from the diesel-powered portable generators are expected to be much less than those modeled. Therefore, additional modeling demonstrations should not be necessary.

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' offsite 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 offsite 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 snap-shot in time.

As requested in the application, a SEPA checklist for the proposed projects (use of portable generators at three separate aircraft storage facilities at GCIA) has been completed and is included as part of this application package.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "John Sherman". The signature is fluid and cursive, with the first name "John" written in a larger, more prominent script than the last name "Sherman".

John Sherman
Senior Manager, EHS - Environment
737 Airplane Program

Enclosures

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