

Department of Environmental Quality Agency Headquarters

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October 22, 2025

The Boeing Company 19000 NE Sandy Blvd. Portland, OR 97230 Sent electronically only

Russell Bardwell,

The Boeing Company (Boeing) was called in to the Cleaner Air Oregon (CAO) program on February 28, 2025. Boeing submitted a CAO Emissions Inventory (Inventory) on May 29, 2025. In accordance with Oregon Administrative Rule (OAR) 340-245-0030(2), DEQ issued a written request on September 15, 2025, requiring additional information and a revised Inventory to be submitted by November 14, 2025. On October 20, 2025, DEQ received a request from Boeing for a 90-day extension to submit the Inventory and supporting information by no later than February 12, 2026.

DEQ may grant an extension based on the criteria set in OAR 340-245-0030(3), which require sources to demonstrate progress towards completing the submittal and show that a delay is necessary for good cause. DEQ has determined that Boeing has demonstrated progress on the Inventory by meeting with DEQ on October 9, 2025, and identifying items from DEQ's request which can be submitted by the original due date of November 11, 2025. DEQ agrees that an extension would allow Boeing to better address all DEQ's comments and develop an accurate and complete Inventory for approval.

For these reasons, DEQ approves Boeing's request and grants a 90-day extension from the original submittal deadline of November 14, 2025. Boeing's revised Inventory and all requested information must be submitted by no later than **February 12, 2026**. The original submittal deadline of **November 14, 2025**, remains for responses to the following comments from DEQ's September 15, 2025, letter:

2. **SDSs**:

- b. Provide SDSs for all materials used at the Degreasing TEU.
- c. Provide updated SDSs for the following coating materials as the SDSs provided with the May 29, 2025, submittal may be out of date:
 - i. H.S. Gloss Red/BAC101 (Boeing Code 92827); and
 - ii. ERTHGRD HS PU White BAC 702 (Boeing Code 96590).
- d. Provide SDSs for all cooling tower chemicals.
- 3. **Environmental Data Sheets**: Provide environmental data sheets (EDSs) for the following products:
 - a. ECLIPSE High Solids Polyurethane Enamel PC-233 (Boeing Code 92002).

6. **Plating Lines**:

- b. Provide justification for excluding Demisters 001SCBR1 and 001SCBR6 from the Inventory. If these units have no emissions of TACs and are therefore not a TEU, provide justification as necessary. Revise the Inventory as needed to include these units.
- d. Confirm if any chemical fume suppressants are used in the plating tanks. If so, provide copies of the SDSs for these materials.

8. **Degreasing TEU**:

a. Provide a description of degreasing activities at the facility.

DEQ remains available to meet with Boeing or provide feedback via email. Please contact me directly at (971) 300-3653 or amy.devita-mcbride@deq.oregon.gov, if you have any questions regarding this letter or CAO submittal requirements. I look forward to your continued assistance with this process.

Sincerely,

Amy DeVita-McBride

Cleaner Air Oregon Project Engineer

Amy DeVita-McBride

Cc: Jeff Kosta, The Boeing Company

Yuki Puram, DEQ Thomas Rhodes, DEQ Dana Corkill, DEQ J.R. Giska, DEQ

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