The Boeing Company
19000 NE Sandy Boulevard
Portland, OR 97230

November 11, 2025

To:
Cleaner Air Oregon
Oregon Department of Environmental Quality
700 NE Multnomah St., Suite 600
Portland, Oregon 97232 - 4100

RE: Cleaner Air Oregon Emissions Inventory Data Request

Regarding DEQ's September 15, 2025 letter requesting additional information related to Boeing Portland's Cleaner Air Oregon (CAO) Emissions Inventory, Boeing Portland is Submitting the identified data in line with the DEQ CAO Inventory extension letter dated 10/22/2025.

Comment Number	Data Description
2.b	SDS for degreasing TEU
2.c	Updated SDSs for two coatings
2.d	SDS for cooling tower chemicals
3.a	Environmental data sheets for a specific paint product
6.b	Justification for scrubber/demister inclusion
6.d	Chemical fume suppressants
8.a	Degreasing TEU description

Comments and Section Narrative:

2.b The SDSs for the three chemical products added to the Degreasing TEU are included with this submittal (SDS numbers 87986, 91420 and 307524).

2.c The two coatings identified in the data request, "H.S. Gloss Red/BAC101 (Boeing Code 92827)" and "ERTHGRD HS PU White BAC 702 (Boeing Code 96590)" are both obsolete products that are no longer used and cannot be ordered in our system. These two products will not be included in the updated CAO form AQ520 moving forward and as a result, updated SDSs are not being provided with this submittal.

2.d SDSs for cooling tower maintenance chemicals (SDS 104205 and 158215) are being provided with this submission and as CAO Toxic Air Contaminants (TACs) are listed as product constituents, cooling towers will be considered when developing an updated form AQ520 for February 2026 submission.

3.a Boeing does not have a specific environmental data sheet for "ECLIPSE High Solids Polyurethane Enamel PC-233 (Boeing Code 92002)" as this is a curing agent used as a component in BMS 10-60 paint. Curing agent 92002 is mixed at a 2:1 base:cure ratio prior to spraying. The technical data sheet for the mixed/as sprayed BMS 10-60 paints is included with this submission.

6.b 001SCBR1 does not receive exhaust from any tanks that contain TACs. 001SCBR6 does receive TACs from the tankline exhaust (e.g. sodium hydroxide) and as a result, form AQ520 will be updated to reflect TAC emissions for 001 SCBR6 when submitted in February 2026. As justification for the exclusion of 001SCBR1, Boeing is submitting the data requested for comment 6.a (list of process tanks, contents and associated control device) with this submission. **The information Boeing is providing in**

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response to this request is proprietary confidential business information. Therefore Boeing is submitting two versions of each document with one redacting the confidential information and the other marked as confidential in both the file name and within the footer of the document.

6.d Boeing does not use chemical fume suppressants in any processing tanks and thus, no SDSs exist to be provided.

8.a Boeing maintains three vapor degreasers utilizing the solvent found in SDS 307524 referred to as the FEI, Serec and Greco degreasers (these are manufacturer names). All three vapor degreasers are subject to the regulations found in 40 CFR 63 Subpart T and the cumulative site-wide rolling twelve-month emission rate of 4,800 kg. This 12-month rolling emission rate is the basis of the annual/daily throughput/emission rates for this TEU. Manufactured parts are processed through these machines to remove oil, grease and other surface contaminants as part of the manufacturing process. The three degreasers typically process parts from the buildings where the parts are manufactured and or based on part size. Actual emissions for the degreasing TEU come from monthly record keeping of additions and removals of solvent from each of the three vapor degreasers.

Please let me know if there are any questions,

Respectfully,
Boeing Portland

Jeff Kosta
Environmental Engineer