

SIP Description – Hamilton Sunstrand, A United Technologies Company – Consent Order 8029A

SIP Description of Enforceable Operating Conditions

On September 3, 2009, the Commissioner of the Department of Environmental Protection issued Consent Order No. 8029A to Hamilton Sundstrand, A United Technologies Company. The order established enforceable operating procedures for the control of Volatile Organic Compounds (“VOC”) Emissions from the facility.

This SIP action is proposed to satisfy the requirements of Section 22a-174-32(e)(6) of the Regulations of Connecticut State Agencies. Specifically, the order is being presented to the Administrator for approval in accordance with the provisions of 42 U.S.C. 7401-7671, et seq.

Consent Order No. 8029A:

Hamilton Sundstrand manufactures and performs rework on aircraft and spacecraft control systems for the aerospace industry. Affected process equipment includes: Vapor Degreaser E45170, Solvent Recovery Stills F0652 & F0651, Test Rigs and Hand Wiping Activities. The facility complied with previous VOC RACT Consent Order No. 8029. Because new records indicate that the potential emissions from the Test Rigs are subject to VOC RACT and that the Test Rigs had not been included in Consent Order No. 8029, the facility requested the issuance of an order to implement an Alternative Compliance Plan in accordance with Section 22a-174-32(e)(6) of the Regulations, citing the belief that additional VOC emission reductions achieved by installing air pollution control equipment were technically and economically infeasible. The Department approved the facility's claim that the installation of additional emission control equipment was technically and economically infeasible and negotiated the issuance of Order #8029A to supersede Consent Order No. 8029 dated July 31, 1989.

Consent Order # 8029A limits operations at Hamilton Sundstrand as follows:

1. Only Non-VOC and /or Exempt VOC may be used in Degreaser E45170 and Still F0652.
2. VOC being condensed in Still F0651 shall achieve a recovery rate of no less than 95%.
3. Except for the use of aviation fuels in the test rigs located in the facility's research laboratory, the vapor pressure of all fuels used in all other test rigs located throughout the facility shall be less than or equal to 3.1mm Hg at 70 Degrees Fahrenheit.
4. VOC emissions from the test rigs shall be mitigated by adhering to good work practices, before and during startup, and after shutdown of the test rigs.
5. VOC emissions from the disposal of rags shall be mitigated by adhering to good work practices for hand wiping activities.

6. The facility shall make and keep records as specified in the order to demonstrate compliance with the material content and work practices requirements of the order.

The operating limits and material VOC content limits of the order serve to ensure that Hamilton Sundstrand reduces and minimizes the VOC emissions from operating the degreaser, stills, test rigs and disposing of dirty rags at the facility. With except of the limits established for the test rigs, all of the above limits were derived from previous Consent Order 8029. The test rigs' limits however were derived from a Best Available Control Technology determination for the installation of test rigs at the US Tinker Air Force Base located in Oklahoma. The VOC emissions reduction achieved at the facility is approximately 83 percent, if not greater, compared to the facility's VOC emissions in year 1987.

In conclusion, this action is proposed to implement an Alternative Compliance Plan for Reasonably Available Control Technology of Volatile Organic Compound Emissions pursuant to Section 22a-174-32(e)(6) of the Regulations of Connecticut State Agencies and 42 U.S.C. 7401-7671, et seq.