



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



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VS.

SIKORSKY AIRCRAFT DIVISION
OF UNITED TECHNOLOGIES CORPORATION

STATE ORDER NO. 8010

Proposed-Jan. 26, 1987
Final-October 25, 1989

IN THE MATTER OF STATE ORDER NO. 8010

WHEREAS, The Sikorsky Aircraft Division of United Technologies Corporation (hereinafter, the "Company") a Delaware Corporation doing business at 6900 Main Street, Stratford, Connecticut operates seven (7) degreasers, a flow coater and other surface coating equipment (twelve (12) separate sources) subject to Section 22a-174-20(ee) of the Administrative Regulations for the Abatement of Air Pollution (hereinafter, "Regulations"); and

WHEREAS, Section 22a-174-20(ee) of the Regulations requires a demonstration of Reasonably Available Control Technology (RACT) for any premises with "potential emissions," as currently defined by the Administrative Regulations for the Abatement of Air Pollution, of Volatile Organic Compounds in excess of one hundred (100) tons per year. The discharges of volatile organic compound emissions are required to be limited by RACT by 12/31/85 unless a compliance plan is filed under Section 22a-174-20 (ee)(3); and

WHEREAS, RACT is considered the lowest achievable emission limitation that a source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility; and

WHEREAS, the Company, in fulfilling the requirements of State Order No. 945, has proposed RACT for the relevant sources and its determination has been accepted by the Commissioner; and

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WHEREAS, the Company was issued a Final Order on October 18, 1988 and subsequently appealed the Final Order on November 22, 1988. An administrative hearing was held on February 14, 1989 and a Final Decision rendered on September 29, 1989 which upheld the Reasonably Available Control Technology determination made by the Department of Environmental Protection; and

WHEREAS, the Commissioner has determined the implementation schedule for measures which have been determined to represent RACT for two (2) operating degreasers and the flow coater and a program to implement new or reformulated surface coatings for surface coating operations involving primers and polyurethane topcoats; and

WHEREAS, the Company and this Department each acknowledges that final approval of the RACT proposal must be issued by the United States Environmental Protection Agency in that approval of RACT proposals required pursuant to Section 22a-174-20(ee) must be submitted as revisions to Connecticut's State Implementation Plan.

NOW, THEREFORE, by authority of Section 22a-178, et. seq. of the Connecticut General Statutes and Section 110(a) of the Clean Air Act, as amended, 42 U.S.C. Section 7410(a), the Commissioner hereby orders the Sikorsky Aircraft Division of the United Technologies Corporation to complete the following measures, as further delineated by the Compliance Timetable which is hereby incorporated by reference in this Order. The applicable requirements are as follows:

1. Complete replacement of the current B-VD degreaser to cause compliance with 22a-174-20(1) to be achieved by 7/1/87. The subject degreaser was previously exempted from Section 22a-174-20(1) as installed prior to 1980 but for the purposes of Section 22a-174-20(ee), Reasonably Available Control Technology is hereby defined as compliance with the requirements of Section 22a-174-20(1).
2. Discontinue operation of D-VD degreaser on July 1, 1987. The D-VD degreaser is not currently in compliance with Section 22a-174-20(1) and RACT. The Company has scheduled the shutdown of this degreaser on July 1, 1987 when replacement of the B-VD degreaser is completed.

3. The Company permanently discontinued the use of the SGD-2 vapor degreaser on October 14, 1987. It was dismantled shortly thereafter.
4. Operate the four remaining degreasers (Anodize, Nital Etch, Paint Shop 2 1/2 and Zyglo), which have been determined to be in compliance with RACT, in such a manner as to maintain compliance with RACT as designated by Sec. 22a-174-20(1).
5. Immediately begin the steps necessary to design and install a carbon adsorption/solvent recovery system, for the flow coating operation. The Company and the Commissioner have determined that this represents RACT for the flow coating operation.
6. Complete the implementation to a low solvent epoxy primer in spray booths #2/2A and Cell Nos. 1, 2, 3 and 4. The new reformulated epoxy primer shall contain no greater than 2.92 lbs. of VOC per gallon of coating minus water. The Company and the Department have determined that a low solvent epoxy primer containing no greater than 2.92 lbs. of VOC per gallon of coating minus water represents RACT. The limitation is to be met continuously in these booths after 12/31/87.
7. Cell Nos. 1, 2, 3 and 4 apply polyurethane topcoats which must meet very strict U. S. military specification performance requirements. The Department has determined RACT to represent the following scheduled VOC reduction in each cell.
 - A) By December 31, 1987, all polyurethane topcoats, with the exception of the black polyurethane topcoat in Paint Shop #1, shall have no greater than 5.7 lbs. of VOC per gallon of coating minus water as applied.

The black polyurethane topcoat in Paint Shop #1 shall have no greater than 6.61 lbs. of VOC per gallon of coating minus water as applied.
 - B) By December 31, 1989, all polyurethane topcoats, with the exception of the black polyurethane topcoat in Paint Shop #1, shall have no greater than 3.5 lbs. of VOC per gallon of coating minus water as applied.

The black polyurethane topcoat in Paint Shop #1 shall have no greater than 6.61 lbs. of VOC per gallon of coating minus water as applied.

These limitations are to be met continuously in these booths after the applicable final compliance dates specified above.

If a coating cannot meet the above limitations, the Company shall submit documentation to the Department for review justifying that the coating cannot be reformulated to the appropriate limit. This documentation can take the form of a detailed response from the paint manufacturer, the end user of the product or other data which would support the continued use of the non-complying paint. Any exemption must be approved by EPA as well as the Department.

8. To monitor compliance and progress in implementing the above RACT determinations the company shall develop a recordkeeping system for the purpose of tracking the following:
 - A) The solvent use, VOC emissions and consequent VOC reductions on a per degreaser basis.
 - B) The current solvent usage by the flow coater and upon installation of the carbon adsorption/solvent recovery unit, the amount of solvent recovered, for determining the overall system efficiency which must be maintained at a minimum of 85 percent.
 - C) On a daily basis, collect usage data for the Experimental, Small Parts and Special Prime spray booths and the Dipping Pot (outside of paint booths 2/2A) to monitor continued compliance with the exemption limit of 40 lbs. per day Volatile Organic Compound emissions.
 - D) On a daily basis collect usage data on the remaining eight spray booths.
9. Submission of all required reports and data by the dates specified by the Compliance Timetable.

10. The implementation of these RACT determinations does not excuse the source from compliance with any source-specific VOC emission limitations which may be adopted at any future time, nor does it excuse the Company from responsibility to comply with Section 22a-174-29 of the Regulations concerning Hazardous Air Pollutants.
11. Upon the effective date of this order, the Company shall cease operation of the B-VD, Zyglo or Anodize still whenever the solvent recovery still condenser outlet exhaust temperature exceeds 37.5°C (100°F) above which temperature the perchloroethylene solvent recovery still is achieving less than the minimum required ninety-five (95) percent recovery rate of perchloroethylene. The condenser outlet exhaust temperature on the solvent recovery still shall be monitored by a trip alarm set at 37.5°C (100°F) to ensure that the efficiency of the solvent recovery still does not go below a ninety-five (95) percent control efficiency. The condenser outlet exhaust gas temperature shall be monitored once per day until the trip alarm is installed. All malfunctions of the solvent recovery unit shall be documented and the records be made available to this Department on request.

All waste perchloroethylene sludge residues (before being sent out as a waste product) must be stored in closed containers which prevent the evaporation of VOC to the atmosphere.

It is acknowledged that failure to comply with the requirements of this Order as well as to comply with the terms and conditions set forth in the Compliance Timetable (which is hereby incorporated, by reference, in this Order) shall constitute a violation of the Regulations of the Department and may subject the Company to further enforcement action in accordance with applicable laws and regulations which may include liability for civil assessments up to \$25,000 plus \$1,000 per day pursuant to Section 22a-6b(a)(3) of the Connecticut General Statutes and Section 22a-6b-603 of the Department's Regulations. Failure to submit a Progress Report by the dates set forth in the Compliance Timetable may subject the Company to liability for civil assessments pursuant to Section 22a-6b(a)(3) of the General Statutes and Section 22a-6b-601 of the Department's Regulations.

Sikorsky Aircraft Division
of United Technologies Corp.

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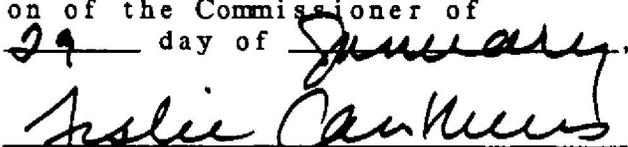
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Departmental action under this authority in no way prevents the Commissioner from seeking, in addition or separately, an injunction enforcing this State Order together with penalties of up to One Thousand Dollars (\$1,000.00) per day for each day of continuing violations in court proceedings under Section 22a-180 of the General Statutes.

Any document or notice required to be submitted to the Commissioner under this Order shall, unless otherwise specified in writing by the Commissioner, be directed to:

Steven E. Peplau, Principal Air Pollution Control Engineer
Bureau of Air Management
Department of Environmental Protection
165 Capitol Avenue, Room 131-A
Hartford, Connecticut 06106
Phone - 566-6682

Entered as a final decision of the Commissioner of
Environmental Protection this 29 day of January,
1990.



Leslie Carothers
Commissioner
Dept. of Environmental Protection

LC
Encs.

Certified Document No.