

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF CONNECTICUT)

VS.)

SIKORSKY AIRCRAFT CORPORATION)

ORDER NO. 8010
ADDENDUM A

CONSENT ORDER

A. With the agreement of Sikorsky Aircraft Corporation ("Respondent"), formerly named the Sikorsky Aircraft Division of United Technologies Corporation in Order No. 8010, the Commissioner of Environmental Protection ("Commissioner") finds the following:

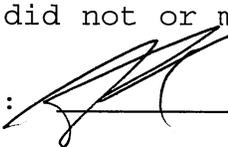
- 1. Respondent is a Delaware Corporation which operates a facility engaged in aerospace manufacturing located at 6900 Main Street, Stratford, Connecticut ("facility").
2. At the facility, Respondent operates the following for the purposes of coating miscellaneous metal parts: ten (10) paint spray booths: 2A, 2B, 2C, Department 1259 (Gear Housings), Paint Shop No. 1 (Blades), Department 1600 (Small Parts Bonding), Special Prime, VH Parts, Development Manufacturing Center (DMC) and Small Parts (Finishes Building); three (3) cells in the Finishes Building: 1, 2 (VH) and 3; one (1) tank for dip application of primer (Dipping Pot) and Maskant Flow Coater. For purposes of this Consent Order, these metal coating units will be referred to collectively as "metal coating areas". Coatings used for the metal coating areas are subject to the volatile organic compound ("VOC") emission limits of Section 22a-174-20(s)(3) of the Regulations of Connecticut State Agencies ("Regulations"), Order No. 8010, and Attachment 1 of this Addendum.
3. On January 29, 1990, the Commissioner issued Order No. 8010 to Respondent.
4. This Consent Order serves as Addendum A to Order No. 8010.

B. With the agreement of Respondent, the Commissioner, acting

Respondent's Initials: [Signature] Date: 1-25-96

under Sections 22a-6, 22a-171, 22a-174 and 22a-177 of the Connecticut General Statutes, orders as follows:

1. Upon issuance of this Consent Order, Respondent shall not exceed the volatile organic compound (VOC) specialty coating limits established in Attachment 1 of this Addendum. Said specialty coating limits shall apply to all coatings listed in Attachment 1. The lacquers, topcoats and primers shall meet the limits set forth in Order No. 8010. All other coatings of interior aircraft parts and unassembled exterior parts of aircraft shall meet the limits set forth in Section 22a-174-20(s) of the Regulations.
2. Notwithstanding paragraph B.1., if Respondent exceeds any applicable VOC coating limit established in Attachment 1 of this Addendum, Order No. 8010, or Section 22a-174-20(s) of the Regulations, Respondent shall offset the excess emissions pursuant to Consent Order No. 8010, Addendum B.
3. The specialty coating limits established in Attachment 1 of this Addendum do not relieve Respondent of responsibility for complying with any source-specific VOC emission limitations which may be adopted at any future time, nor do said specialty coating limits relieve Respondent of responsibility for complying with Section 22a-174-29 of the Regulations.
4. Definitions. As used in this Consent Order, "Commissioner" means the Commissioner or an agent of the Commissioner.
5. Dates. The date of submission to the Commissioner of any document required by this Consent Order shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this Consent Order, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three days after it is mailed by the Commissioner, whichever is earlier. Except as otherwise specified in this Consent Order, the word "day" as used in this Consent Order means calendar day. Any document or action which is required by this Consent Order to be submitted or performed by a date which falls on a Saturday, Sunday or Connecticut or federal holiday shall be submitted or performed on or before the next day which is not a Saturday, Sunday or Connecticut or federal holiday.
6. Notification of noncompliance. In the event that Respondent becomes aware that it did not or may not comply, or did not or may not comply on time, with any

Respondent's Initials: 

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requirement of this Consent Order or of any document required hereunder, Respondent shall immediately notify the Commissioner and shall take all reasonable steps to ensure that any noncompliance or delay is avoided or, if unavoidable, is minimized to the greatest extent possible. In so notifying the Commissioner, Respondent shall state in writing the reasons for the noncompliance or delay and propose, for the review and written approval of the Commissioner, dates by which compliance will be achieved, and Respondent shall comply with any dates which may be approved in writing by the Commissioner. Notification by Respondent shall not excuse noncompliance or delay, and the Commissioner's approval of any compliance dates proposed shall not excuse noncompliance or delay unless specifically so stated by the Commissioner in writing.

7. Certification of documents. Any document, including but not limited to any notice, which is required to be submitted to the Commissioner under this Consent Order shall be signed by a responsible corporate officer of the Respondent or a duly authorized representative of such officer, as those terms are defined in section 22a-430-3(b)(2) of the Regulations of Connecticut State Agencies and by the individual or individuals responsible for actually preparing such document, each of whom shall certify in writing as provided in Section 22a-3a-5(a)(2) of the Regulations.
8. Respondent's Obligations Under Law. Nothing in this Consent Order shall relieve Respondent of other obligations under federal, state and local law, including, but not limited to, Chapters 439 and 446 and Sections 22a-175, 22a-6 and 53a-157 of the Connecticut General Statutes. The Respondent and Commissioner have agreed that this Consent Order is to be enforceable upon issuance and that no appeal shall be taken.
9. False statements. Any false statement in any information submitted pursuant to this Consent Order may be punishable as a criminal offense under Section 22a-175 of the Connecticut General Statutes or, in accordance with Section 22a-6, under Section 53a-157 of the Connecticut General Statutes.
10. Notice of transfer; liability of Respondent and others. Until Respondent has fully complied with this Consent Order, Respondent shall notify the Commissioner in writing no later than fifteen days after transferring all or any portion of the operations, the facility or the business, which are the subject of this Consent Order, or obtaining a new mailing or location address. Respondent's obligations under this Consent Order shall

Respondent's Initials:



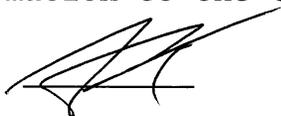
Date:

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not be affected by the passage of title to any property to any other person or municipality. Any future owner of the facility may be subject to the issuance of an order from the Commissioner.

11. Commissioner's powers. Nothing in this Consent Order shall affect the Commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, recover costs and natural resource damages, and to impose penalties for violations of law which are willful or criminally negligent or for which penalties have not been specifically provided in this Consent Order, including but not limited to violations of any permit issued by the Commissioner. If at any time the Commissioner determines that the actions taken by Respondent pursuant to this Consent Order have not fully characterized the extent and degree of pollution or have not successfully abated or prevented pollution, the Commissioner may institute any proceeding to require Respondent to undertake further investigation or further action to prevent or abate pollution.
12. Respondent's obligations under law. Nothing in this Consent Order shall relieve Respondent of other obligations under applicable federal, state and local law.
13. No assurance by Commissioner. No provision of this Consent Order and no action or inaction by the Commissioner shall be construed to constitute an assurance by the Commissioner that the actions taken by Respondent pursuant to this Consent Order will result in compliance or prevent or abate pollution.
14. Access to facility. Any representative of the Department of Environmental Protection may enter the facility without prior notice for the purposes of monitoring and enforcing the actions required or allowed by this Consent Order.
15. No effect on rights of other persons. This Consent Order shall neither create nor affect any rights of persons who or municipalities which are not parties to this Consent Order.
16. Notice to Commissioner of changes. Within fifteen days of the date Respondent becomes aware of a change in any information submitted to the Commissioner under this Consent Order, or that any such information was inaccurate or misleading or that any relevant information was omitted, Respondent shall submit the correct or omitted information to the Commissioner.

Respondent's Initials:



Date:

1-25-96

17. Submission of documents. Any document required to be submitted to the Commissioner under this Consent Order shall, unless otherwise specified in writing by the Commissioner, be directed to:

Wendy Jacobs
Department of Environmental Protection
Air Management Bureau
79 Elm Street, 5th Floor
Hartford, Connecticut 06106-5127

Respondent consents to the issuance of this Consent Order without further notice. The undersigned certifies that he/she is fully authorized to enter into this Consent Order and to legally bind the Respondent to the terms and conditions of the Consent Order.

SIKORSKY AIRCRAFT CORPORATION

Signature: 

Print: George C. May

Title: Sr. Vice President - Finance

Date: January 25, 1996

Issued as a final order of the Commissioner of Environmental Protection on 7 Feb, 1996.


Sidney D. Holbrook
Commissioner

SH/WJJ

CITY OF STRATFORD LAND RECORDS

MAILED CERTIFIED MAIL,
RETURN RECEIPT REQUESTED

Certified Document No.

ATTACHMENT 1

COATING TYPE AND NAME

<u>Adhesive Bonding Primer</u>	<u>VOC LIMIT (POUNDS PER GALLON)</u>	<u>VOC LIMIT (POUNDS PER GALLON OF SOLIDS)</u>
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Adhesive Primer EC3917	6.50	55.63
Adhesive Primer EC1945	6.50	55.63
Adhesive Primer EA9202	6.50	55.63
Adhesive Primer EC1290	6.50	55.63
Adhesive Primer EA9203	6.50	55.63

Clear Coating

Clear Polyurethane	4.40	10.94
KemVar Urethane	4.40	10.94
Clear Epoxy	4.40	10.94

Temporary Part Marking

Dyescan	7.10	200.98
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Adhesion Promoter

Wash Primer	7.35	5250.00
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Corrosion Inhibiting Compound

Corrosion Resistant Epoxy Primer	5.90	29.74
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Electric Effect

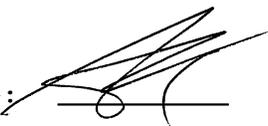
Silver Conductive Epoxy	6.70	74.72
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Antichafe

Teflon Epoxy Phenolic	5.80	27.36
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Dry Lubricant

Dry-Film Lubricant 620	7.33	1787.80
Dry-Film Lubricant 620-C	7.33	1787.80
Dry-Film Lubricant 642	7.33	1787.80

Respondent's Initials: Date: 1-25-96

ATTACHMENT 1

<u>COATING TYPE AND NAME</u>	<u>VOC LIMIT (POUNDS PER GALLON)</u>	<u>VOC LIMIT (POUNDS PER GALLON OF SOLIDS)</u>
<u>Sealant</u>		
Featherfill	5.00	15.59
AWL-Quik	5.00	15.59
<u>High Temperature</u>		
Epoxy Resin	7.10	200.98
Turco Pretreat	7.10	200.98
<u>Metalized Epoxy</u>		
Epoxy Silver	6.20	39.34
<u>Topcoat</u>		
Chemical Agent Resistant Coating (CARC)	4.25	10.12

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