



David B. Conroy, Chief  
Air Programs Branch  
United States Environmental Protection Agency – Region 1  
5 Post Office Square - Suite 100  
Boston, MA 02109-3912

Dear Mr. Conroy,

The Connecticut Department of Energy and Environmental Protection submitted revisions to the State Implementation Plan (SIP) that included Consent Order (CO) Number 8246 on July 1, 2004 and Modification 1 to CO #8246 on January 13, 2006. To date, EPA has not taken final action on CO #8246 or Modification 1. The Department would like to modify those submittals by withdrawing CO #8246 and Modification 1 to CO #8246.

The Department issued CO #8246 to Sikorsky on October 31, 2003 to provide a method of compliance with the aerospace specialty coatings volatile organic compound (VOC) content limits through the creation of VOC emission reduction credits to offset excess emissions. CO #8246 was based on an Alternative Emission Reduction Plan that Sikorsky submitted on July 18, 2002 under section 22a-174-20(cc)(1) of the Regulations of Connecticut State Agencies (RCSA). Modification 1 to CO #8246 issued on May 23, 2005.

On October 31, 2012, DEEP finalized amendments to RCSA section 22a-174-20(s) and incorporated the aerospace NESHAP (40 CFR Part 63, Subpart GG) and aerospace CTG (EPA-453/R-97-004, December 1997) coating VOC content limits for coating of aerospace parts. With this regulatory revision, Sikorsky can comply with the VOC content limits specified in RCSA section 22a-174-20(s); therefore, CO #8246, including Modification 1, is no longer needed for compliance. To maintain the reductions from the Nital Etch process, limits were incorporated into NSR permits 178-0078, 178-0128 and 178-0035 as collateral conditions. The revised permits were issued on February 11, 2016 and the order was closed on May 26, 2016.

A copy of CO #8246, Modification 1 and the order closure memorandum are attached.

If you have any questions, please contact Robin Baena of my staff at (860) 424-3196.

Sincerely yours,

July 21, 2016  
Date

Anne R. Gobin  
Anne R. Gobin  
Chief, Bureau of Air Management

cc: Anne Arnold, EPA Region 1  
Robert McConnell, EPA Region 1