



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

5 Post Office Square, Suite 100

BOSTON, MA 02114-2023

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Dated via electronic signature stamp

Tricia Haederle
Sikorsky Aircraft Corporation
1210 South Avenue
Bridgeport, CT 06604

RE: **NOTICE OF VIOLATION** of the Resource Conservation and Recovery Act
Act of 1976 (RCRA), the Hazardous and Solid Waste Amendments of 1984 (HSWA), 42 U.S.C.
6622(a) and 6924(d) through (m), and Chapter 22a of the Connecticut General Statutes.

Dear Ms. Haederle:

On July 10-11, 2023, representatives of the United States Environmental Protection Agency ("EPA") completed a RCRA compliance evaluation inspection (CEI) of Sikorsky Aircraft Corporation, EPA ID # CTD001449735. The purpose of this inspection was to determine the compliance of Sikorsky Aircraft Corporation, with RCRA 22a-449(c)-100 through 119, and the federal Hazardous Waste Management Regulations found at 40 CFR Parts 260-273. The State of Connecticut has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection noted above, EPA has determined that your facility violated certain provisions of RCRA 22a-449(c)-100 through 119, and the corresponding federal Hazardous Waste Management Regulations found at 40 CFR Parts 260 through 272. The violations are set forth below:

- 1. Failure to mark the date upon which each period of accumulation begins on each container, as required by §22a-449(c)-102(a), which incorporates by reference 40 CFR 262.34(a)(2).**

There was one 40-gallon container of hazardous waste aerosols that was not dated, located at HWAA LT-20.

Note: A letter from Sikorsky to EPA, sent to Cheryl Wilkinson via email on August 4, 2023, stated the container was originally at an SAA, and was moved to LT-20 during second shift on July 11, 2023, and was not dated until the evening of the July 12, 2023. The facility has provided supplemental training on July 18, 2023, to reinforce the accumulation date requirements.

2. **Failure to accumulate universal waste for no longer than one year from the date the universal waste is generated, as required by §22a-449(c)-113(a)(1), which incorporates by reference 262.34(a)(4), which references 273.15(a).**

There was one box of universal waste lamps that was dated 03/09/2020, located at HWAA LT-90.

Note: A letter from Sikorsky to EPA, sent to Cheryl Wilkinson via email on August 4, 2023, stated the facility had shipped the universal waste bulbs off-site on July 21, 2023.

3. **Failure to conduct weekly hazardous waste storage area inspections, as required by as required by Sec 22a-449(c)-102 (a)(2)(E) of the RCSA, which incorporates by reference 40 CFR 262.34(a)(1)(i), which refers to 40 CFR 265 Subpart I, which includes 265.174.**

There were no weekly hazardous waste storage area inspections conducted during the weeks of April 12, 2023, and May 31, 2023, at HWAA LT-90.

Sikorsky must address the requirements set forth above and must immediately begin and continue to operate in compliance with all applicable Federal and State regulations.

Within (30) thirty calendar days of receipt of this NOTICE, submit a written description, with supporting documentation, of the actions taken to address requirements number 1 through number 3 above. Submit the information (prefer electronic) to:

Wilkinson.cheryl@epa.gov

OR

Cheryl Wilkinson, Life Scientist
U.S. Environmental Protection Agency
Waste and Chemical Compliance Section
5 Post Office Square, Suite 100
[Mailcode: 5-MO]
Boston, Massachusetts 02109-3912

Failure to correct the violations as required by this NOTICE may subject the facility to further Federal enforcement action, including the assessment of penalties, pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928.

Please direct questions to Cheryl Wilkinson at 617-918-1760 or wilkinson.cheryl@epa.gov.
Thank you for your attention to this matter.

Sincerely,

MARY

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Digitally signed by
MARY O'DONNELL

Date: 2023.10.12
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Mary Jane O'Donnell, Manager
Waste and Chemical Compliance Section

cc: George Dews, CT DEEP