



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Hamilton Sundstrand dba Collins Aerospace, Rockford, Illinois

**FROM:** Charles Hall, Environmental Engineer  
AECAB (MN-OH) **Charles G. Hall**  
Tess Russell, Environmental Engineer  
AECAB (MN-OH) **TESS RUSSELL**

**THRU:** Brian Dickens, Section Chief  
AECAB (MN-OH)

**TO:** File, Hamilton Sundstrand dba Collins Aerospace, Rockford, Illinois

Digitally signed by Charles G. Hall  
Date: 2021.08.16 10:15:16 -05'00'

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**BASIC INFORMATION**

**Facility Name:** Hamilton Sundstrand dba Collins Aerospace

**Facility Location:** 2421 11th Street, Rockford, Illinois 61104-7217

**Date of Inspection:** 06 July 2021

**EPA Inspectors:**

1. Charlie Hall
2. Tess Russell

**Other Attendees:**

1. Larry Carlson, EHS Manager
2. Makenna Beland, Intern

**Contact Email Address:** larry.carlson@collins.com

**Purpose of Inspection:** aerospace manufacturer inspection

**Facility Type:** aerospace manufacturer

**Regulations Central to Inspection:**

- NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 C.F.R. Part 63, Subpart HHHHHH

- NESHAP for Reciprocating Internal Combustion Engines, 40 C.F.R. Part 63, Subpart ZZZZ
- 35 Ill. Adm. Code Part 215, Subpart E (Solvent Cleaning)

**Arrival Time:** 08:20 CDT

**Departure Time:** 11:30 CDT

**Inspection Type:**

- Unannounced Inspection
- Announced Inspection

**OPENING CONFERENCE**

- Presented Credentials
- Stated authority and purpose of inspection
- Provided Small Business Resource Information Sheet
- Small Business Resource Information Sheet not provided
- Provided CBI warning to facility

The following information was obtained verbally from Carlson and Beland unless otherwise noted.

**Company Ownership:** Hamilton Sundstrand has been the owner throughout the past 5 years. However, the company changed its name to Hamilton Sundstrand doing business as Collins Aerospace (hereinafter, Collins) roughly 18 months ago.

**Process Description:** At this facility, Collins engineers, assembles, and tests gear boxes and fuel pumps for commercial and military aircraft. The assembled gear boxes and fuel pumps are degreased, and some are painted with a chromium-containing coating. After testing, the gear boxes and fuel pumps are packaged for shipping. Collins operates: one diesel compression ignition Reciprocating Internal Combustion Engine (RICE); three natural gas fired RICEs (Note: Only two are currently operational); four natural gas-fired boilers (two 6.28 million British thermal unit per hour [MMBtu/hr], one 3.3 mmBtu/hr, and one 5.25 MMBtu/hr); one paint spray booth; cold cleaning degreasing; two vapor degreasers; one gearbox test cell; twenty-one hydraulic test cells; seven underground storage tanks (6 product tanks and 1 RCRA regulated waste tank); and packaging foam operation. Collins also owns and operates five cooling appliances (greater than 50 pounds) that are subject to 40 C.F.R. Part 82, Subpart F.

The facility's NESHAP 6H Training Presentation, employee training log, on-site spray booths, and high-volume low-pressure (HVLP) spray guns were reviewed or observed to determine compliance with 40 C.F.R. Part 63, Subpart HHHHHH. The Air Emissions Reports between 2017-2020 and the RICE Hours (2017-2020) were reviewed to determine compliance of 40 C.F.R. Part 63, Subpart ZZZZ. The facility's cold cleaning degreasing and two vapor degreasers were observed to determine compliance with 35 Ill. Adm. Code Part 215, Subpart E (Solvent

Cleaning). Further investigation of the facility's cooling appliances to determine compliance with 40 C.F.R. Part 82, Subpart F was not warranted.

The Air Emissions Reports between 2017-2020 were reviewed to ensure the facility's continued status as not subject to 40 C.F.R. Part 63, Subparts GG and MMMM.

### **TOUR INFORMATION**

**EPA Tour of the Facility:** Yes

**Photos and/or Videos** were not taken during the inspection.

**Field Measurements** were not taken during the inspection.

### **CLOSING CONFERENCE**

Provided U.S. EPA point of contact to the facility

### **Requested documents:**

- Aerial Facility Drawing
- Air Emission Reports for 2017 through 2020
- Material Data Safety Sheet for chrome containing coatings
- Training Records for NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources
- Training presentation for NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources
- Spreadsheet of industrial process refrigeration units and comfort cooling appliances that use an ozone-depleting substance; the full capacity; and the refrigerant

**Concerns:** The inspectors did not identify any areas of concern.

### **DIGITAL SIGNATURES**

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Charles Hall, Environmental Engineer

Brian Dickens, Section Chief