STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

July 20, 2007

Mr. David Conroy, Chief
Air Programs Branch
Office of Ecosystem Protection
U.S. EPA, EPA New England
One Congress Street, Suite 1100
Mail Code CAB
Boston MA 02114-2023

Re: Revision of Connecticut's State Implementation Plan for Air Quality
for Consent Orders

Dear Mr. Conroy: Dave

By this correspondence, pursuant to 40 CFR 51.102, Connecticut formally requests United States Environmental Protection Agency ("EPA") revise Connecticut's State Implementation Plan ("SIP") for Air Quality as explained in this letter and enclosed supporting materials. This revision will incorporate new Consent Orders into Connecticut's SIP and make such revision federally enforceable.

The proposed revision to the SIP was subject to public hearing procedures to satisfy the requirements of 40 CFR 51.102. Evidence of the public hearing is enclosed as follows:

- Exhibit 1, public notice of hearing and certifications of publication;
- Exhibit 2, letters to directors of air quality in affected states, public libraries, EPA, and regulated sources;
- Exhibit 3, delegation of hearing officer, hearing certification and hearing report; and
- Exhibit 4, new Consent Orders and SIP narratives.

Please do not hesitate to contact Elizabeth McAuliffe, Environmental Analyst, at (860) 424-3702 should you or your staff have any questions or comments regarding this matter.

Sincerely yours,

July 20, 2007
Date

Anne Gobin
Chief
Bureau of Air Management

Enclosures
cc: Ms. Anne Arnold, U.S. EPA, EPA New England

Exhibit 1

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Notice of Intent to Revise the State Implementation Plan for Air Quality

The Commissioner of Environmental Protection hereby gives notice of a public hearing as part of a State Implementation Plan revision proceeding. These revisions will be submitted to the U.S. Environmental Protection Agency (EPA) for their review and approval as a revision to the State Implementation Plan (SIP) for air quality as required by the Clean Air Act Amendments of 1990 (CAA). The public hearing will address State Orders for the following:

Curtis Packaging Corporation	Consent Order No. 8270
Sumitomo Bakelite North America, Inc.	Consent Order No. 8245
Cyro Industries	Consent Order No. 8268

The purpose of this revision is to allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

All interested persons are invited to comment on the proposed SIP revision. Comments should be submitted to the Department of Environmental Protection, Bureau of Air Management, Compliance and Field Operations Division, 79 Elm Street, Hartford, Connecticut 06106-5127. All comments should be directed to the attention of Shannon Rittner and must be received by 4:30, Friday, June 29th, 2007.

In addition to accepting written comments, the Department will also hold a public hearing as described below. Persons appearing at this public hearing are requested to submit a written copy of their statement. However, oral comments will also be made a part of the hearing record and are welcome.

PUBLIC HEARING

Friday, June 29, 2007
10:00 A.M.
Holcombe Room
Department of Environmental Protection
79 Elm Street, 5th Floor
Hartford, Connecticut

Copies of the proposed orders described above are available for public inspection during normal business hours and may be obtained from Shannon Rittner of the Bureau of Air Management, Compliance and Field Operations Division, 5th Floor, 79 Elm Street, Hartford, CT. An additional copy is also available for review at the Government Information Service Desk (Balcony level) at the Connecticut State Library, Hartford, Torrington Public Library, Bridgeport Public Library and New London Public Library. For further information, contact Elizabeth McAuliffe of the Bureau of Air Management at (860) 424-3702.

The DEP is an affirmative action/equal opportunity employer, providing programs and services in a fair and impartial manner. In conformance with the ADA, DEP makes every effort to provide equally effective services for persons with disabilities. Individuals with disabilities who need information in an alternative format, to allow them to benefit and/or participate in the agency's programs and services,

should call TDD (860)-424-3000 and make their request to the receptionist. Requests for accommodations to attend meetings and/or educational programs, sponsored by the DEP, must be made at least two weeks prior to the program date.

These requests may be made directly to Marcia Z. Bonitto, ADA Coordinator, via e-mail: Marcia.Bonitto@po.state.ct.us

This notice is required pursuant to 40 Code of Federal Regulations Part 51.

May 15, 2007
Date

Amey Marrella
for Gina McCarthy
Commissioner

AE500

Affidavit of Publication

State of Connecticut
County of Fairfield

I, Mary Ann Welch, a billing representative of Graystone Group Advertising, 2710 North Ave., Suite 200, Bridgeport, CT 06604, do solemly swear that on:

Date: May 29, 2007

Ad title: Legal Notice - Notice of Intent to Revise . . .

Appeared in: Torrington Register Citizen publication and the newspaper extracts hereto annexed were clipped from the above named issue of said newspaper.

Subscribed and sworn to this 19 day of June, 2007 before me.

Notary Public
Beth E. Stoller
Notary Public
State of Connecticut
My commission expires 12/31/07

Affidavit of Publication

State of Connecticut
County of Fairfield

I, Mary Ann Welch, a billing representative of Graystone Group Advertising, 2710 North Ave., Suite 200, Bridgeport, CT 06604, do solemly swear that on:

Date: May 29, 2007

Ad title: Notice of Intent to Revise the State Implementation . . .

Appeared in: Connecticut Post publication and the newspaper extracts hereto annexed were clipped from the above named issue of said newspaper.

Subscribed and sworn to this 8 day of June, 2007 before me.

Notary Public

Beth E. Stoller
Notary Public
State of Connecticut
My commission expires 12/31/07

88 571

Affidavit of Publication

State of Connecticut
County of Fairfield

I, **Arleen Rogers**, a billing representative of Graystone Group Advertising, 2710 North Ave., Suite 200, Bridgeport, CT 06604, do solemly swear that on:

Date: 5/29/07

Ad title: NOTICE OF INTENT TO REVISE THE STATE IMPLEMENTATION

Appeared in: NEW LONDON DAY publication and the newspaper extracts hereto annexed were clipped from the above named issue of said newspaper.

Subscribed and sworn to this 27 day of June, 2007 before me.

Notary Public Beth E. Stoller

Beth E. Stoller
Notary Public
State of Connecticut
My commission expires 12/31/07

the following:

Curtis Packaging Corporation	Consent Order No. 8270
Sumitomo Bakelite North America, Inc.	Consent Order No. 8245
Cyro Industries	Consent Order No. 8269

The purpose of this revision is to allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

All interested persons are invited to comment on the proposed SIP revision. Comments should be submitted to the Department of Environmental Protection, Bureau of Air Management, Compliance and Field Operations Division, 79 Elm Street, Hartford, Connecticut 06106-5127. All comments should be directed to the attention of Shannon Ritner and must be received by 4:30, Friday, June 29th, 2007.

In addition to accepting written comments, the Department will also hold a public hearing as described below. Persons appearing at this public hearing are requested to submit a written copy of their statement. However, oral comments will also be made a part of the hearing record and are welcome.

PUBLIC HEARING
Friday, June 29, 2007
10:00 A.M.
Holcombe Room
Department of Environmental Protection
79 Elm Street, 5th Floor
Hartford, Connecticut

Copies of the proposed orders described above are available for public inspection during normal business hours and may be obtained from Shannon Ritner of the Bureau of Air Management, Compliance and Field Operations Division, 5th Floor, 79 Elm Street, Hartford, CT. An additional copy is also available for review at the Government Information Service Desk (Balcony level) at the Connecticut State Library, Hartford, Torrington Public Library, Bridgeport Public Library and New London Public Library. For further information, contact Elizabeth McAuliffe of the Bureau of Air Management at (860) 424-3702.

The DEP is an affirmative action/equal opportunity employer, providing programs and services in a fair and impartial manner. In conformance with the ADA, DEP makes every effort to provide equally effective services for persons with disabilities. Individuals with disabilities who need information in an alternative format, to allow them to benefit and/or participate in the agency's programs and services, should call TDD (860)-424-3000 and make their request to the receptionist. Requests for accommodations to attend meetings and/or educational programs, sponsored by the DEP, must be made at least two weeks prior to the program date.

These requests may be made directly to Marcia Z. Benito, ADA Coordinator, via e-mail: Marcia.Benito@po.state.ct.us

This notice is required pursuant to 40 Code of Federal Regulations Part 51.

May 15, 2007
Gina McCarthy
Commissioner
AE500

2053

STATE OF CONNECTICUT

RETURN DATE: JUNE 12, 2007	: SUPERIOR COURT
U.S. BANK NATIONAL ASSOCIATION AS TRUSTEE FOR WACHOVIA LOAN TRUST SERIES 2006-AMN11	: JUDICIAL DISTRICT OF NEW LONDON
VS.	: AT NEW LONDON
EARL WALLACE, EXECUTOR OF THE ESTATE OF CARRIE L. DAVIS, ET AL.	: April 24, 2007

Application # P 07-11: 45 Broad Street, Susan Beve, Owner, Peter Springsteel, Architect. Application for Special Permit and Site Plan Approval for the construction of a wall greater that 6'-0" on a property in the RP District.

Interested persons may be heard and written communications relative to the above may be received.

A copy of the application is on file for public inspection at the office of the Borough of Stonington Clerk and Zoning Officer, Borough Hall, 26 Church Street, Stonington, CT.

Dated at Stonington, Connecticut, this the 8th day of May March 2007.

Dan Vail
Chairman
The Borough of Stonington
Planning & Zoning Commission

3099

City of Groton

Conservation Commission/ Inland Wetlands Agency
Public Hearing

The City of Groton Conservation Commission/ Inland Wetlands Agency will hold a Public Hearing on Tuesday, June 5, 2007, at 7:30 p.m. at the Municipal Building, 295 Meridian Street, Groton to hear and act on the following matter:

1. For public comment on the proposed new Inland/Wetland Regulations.

Interested persons may be heard, and written communications relative to the above will be received. A copy of the proposed Inland/Wetland Regulations is on file for public inspection at the Office of the Zoning and Building Department, 295 Meridian Street, Groton, CT.

Dated at Groton, Connecticut this 22nd, and 29th day of May 2007.

Conservation Commission/
Inland Wetlands Agency
Longane J. Cimaro, Chairperson

3033

State of Connecticut

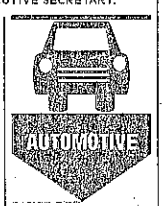
Pursuant to Conn. Gen. Stat. §16-19b, the Department of Public Utility Control will conduct a public hearing at Ten Franklin Square, New Britain, Connecticut, on June 5, 2007, at 9:30 a.m., concerning Docket No. 07-02-01, Semi-Annual Reconciliation of the Connecticut Light and Power Company and The United Illuminating Company's Federally Mandated Congestion Costs and Generation Services Charge to review the proposed reconciliation and rate adjustments. The Department may continue the hearing. For information and the Notice of Hearing filed with the Secretary of State's Office, contact: DEPARTMENT OF PUBLIC UTILITY CONTROL, LOUISE B. RICKARD, ACTING EXECUTIVE SECRETARY.

Liquor Permit

2055

Notice of Application

This is to give notice that I, MARGARET L. SUTTON, 102 ROATH ST. APT B, NORWICH, CT 06360, have filed an application pkecordad 05/17/2007 with the Dept. of Consumer Protection for a CONCESSION PERMIT for the sale of alcoholic liquor on the premises at 1080 HARTFORD TPKE, WATERFORD, CT 06385. The business will be owned by R & R FOOD & BEVERAGE SERVICES, LLC. Entertainment will consist of the following: NONE. Remonstrance/objections must be filed by: 06/27/2007



Auto Parts & Accessories

NEW Flaming River Rack & Pinion Manual Kit — For 1967-69 Camaro, $750.

Hartford Courant

Insertion Number:
Size: 2 x 3 B&W
Section/Page/Zone: Classified/C9/FR
Description: NOTICE PURSUANT TO GENERAL STA

...contained on the e-tearsheet.

Affidavit of Publication

State of Connecticut
County of Fairfield

I, Mary Ann Welch, a billing representative of Graystone Group Advertising, 2710 North Ave., Suite 200, Bridgeport, CT 06604, do solemly swear that on:

Date: May 29, 2007

Ad title: Notice of Intent to Revise the State Implementation Plan

Appeared in: Hartford Courant publication and the newspaper extracts hereto annexed were clipped from the above named issue of said newspaper.

Subscribed and sworn to this 8 day of June, 2007 before me.

Notary Public

Beth E. Stoller

Beth E. Stoller
Notary Public
State of Connecticut
My commission expires 12/31/07

1584

Exhibit 2

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Chris Salmi, Assistant Director
Department of Environmental Protection
Office of Air Quality Management
401 E. State Street, 7th Floor
P.O. Box 418
Trenton, New Jersey 08625-0418

Re: ***Proposed Revision of Connecticut's State Implementation Plan - Reasonable Available Control Technology for volatile organic compound emissions***

Dear Mr. Salmi:

In accordance with the provisions of Title 40 Code of Federal Regulations Section 51.102, the enclosed notice for public hearing and associated materials are being forwarded for your information.

The hearing notice concerns a revision to the State Implementation Plan to request that the U.S. Environmental Protection Agency (EPA) allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

Please feel free to comment on this information or contact me at (860) 424-3702 if you have any questions.

Sincerely,

05 - 17 - 2007
Date

Gary A. Rose
Gary Rose, Director
Engineering & Enforcement Division
Bureau of Air Management

Enclosures
cc: Elizabeth McAuliffe, CT DEP

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Barbara A. Kwetz, Director
Massachusetts Department of Environmental Protection
Bureau of Waste Prevention
Division of Planning and Evaluation
One Winter Street, 8th Floor
Boston, Massachusetts 02108

Re: ***Proposed Revision of Connecticut's State Implementation Plan - Reasonable Available Control Technology for volatile organic compound emissions***

Dear Ms. Kwetz:

In accordance with the provisions of Title 40 Code of Federal Regulations Section 51.102, the enclosed notice for public hearing and associated materials are being forwarded for your information.

The hearing notice concerns a revision to the State Implementation Plan to request that the U.S. Environmental Protection Agency (EPA) allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

Please feel free to comment on this information or contact me at (860) 424-3702 if you have any questions.

Sincerely,

05 - 17 - 2007
Date

Gary S. Rose
Gary Rose, Director
Engineering & Enforcement Division
Bureau of Air Management Enclosures

cc: Elizabeth McAuliffe, CT DEP

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

David Shaw, Director
New York Department of Environmental Conservation
Division of Air Resources
625 Broadway
Albany, New York 12233-3251

Re: ***Proposed Revision of Connecticut's State Implementation Plan - Reasonable Available Control Technology for volatile organic compound emissions***

Dear Mr. Shaw:

In accordance with the provisions of Title 40 Code of Federal Regulations Section 51.102, the enclosed notice for public hearing and associated materials are being forwarded for your information.

The hearing notice concerns a revision to the State Implementation Plan to request that the U.S. Environmental Protection Agency (EPA) allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

Please feel free to comment on this information or contact me at (860) 424-3702 if you have any questions.

Sincerely,

05-17-2007
Date

Gary A. Rose
Gary Rose, Director
Engineering & Enforcement Division
Bureau of Air Management

Enclosures

cc: Elizabeth McAuliffe, CT DEP

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Stephen Majkut, Chief
Rhode Island Dept. of Environmental Management
Office of Air Resources
235 Promenade Street
Providence, Rhode Island 02908-5767

Re: *Proposed Revision of Connecticut's State Implementation Plan - Reasonable Available Control Technology for volatile organic compound emissions*

Dear Mr. Majkut:

In accordance with the provisions of Title 40 Code of Federal Regulations Section 51.102, the enclosed notice for public hearing and associated materials are being forwarded for your information.

The hearing notice concerns a revision to the State Implementation Plan to request that the U.S. Environmental Protection Agency (EPA) allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

Please feel free to comment on this information or contact me at (860) 424-3702 if you have any questions.

Sincerely,

05 - 17 - 2007
Date

Gary A. Rose
Gary Rose, Director
Engineering & Enforcement Division
Bureau of Air Management

Enclosures

cc: Elizabeth McAuliffe, CT DEP

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

May 18, 2007

Ms. Marcia Stuart
New London Public Library
63 Huntington Street
New London, CT 06320

Dear Ms. Stuart,

I I request your assistance in making the enclosed notice and associated materials available for public inspection from May 29th, 2007, through June 29th, 2007. The materials contain information concerning a proposed revision to the State Implementation Plan to request that EPA allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

The Department will submit the revision to the U.S. Environmental Protection Agency for review and approval as a revision to the State Implementation Plan pursuant to the Clean Air Act Amendments of 1990. After June 29th, 2007, you may dispose of the materials as you see fit.

Please call me at (860) 424-3458 if you have any questions. Thank you for your assistance in this matter.

Cordially,

Elizabeth McAuliffe
Environmental Analyst
Bureau of Air Management

Enclosure

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

May 18, 2007

Collection Management Unit
Attention: Connecticut Documents
Connecticut State Library
231 Capitol Avenue
Hartford, CT 06106

I request your assistance in making the enclosed notice and associated materials available for public inspection from May 29th, 2007, through June 29th, 2007. The materials contain information concerning a proposed revision to the State Implementation Plan to request that EPA allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

The Department will submit the revision to the U.S. Environmental Protection Agency for review and approval as a revision to the State Implementation Plan pursuant to the Clean Air Act Amendments of 1990. After June 29th, 2007, you may dispose of the materials as you see fit.

Please call me at (860) 424-3458 if you have any questions. Thank you for your assistance in this matter.

Cordially,

Elizabeth McAuliffe
Environmental Analyst
Bureau of Air Management

Enclosure

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

May 18, 2007

Ms. Karen Worrall
Torrington Public Library
12 Daycoetan Place
Torrington, CT 06790

Dear Ms. Worrall,

I request your assistance in making the enclosed notice and associated materials available for public inspection from May 29th, 2007, through June 29th, 2007. The materials contain information concerning a proposed revision to the State Implementation Plan to request that EPA allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

The Department will submit the revision to the U.S. Environmental Protection Agency for review and approval as a revision to the State Implementation Plan pursuant to the Clean Air Act Amendments of 1990. After June 29th, 2007, you may dispose of the materials as you see fit.

Please call me at (860) 424-3458 if you have any questions. Thank you for your assistance in this matter.

Cordially,

Elizabeth McAuliffe

Elizabeth McAuliffe
Environmental Analyst
Bureau of Air Management

Enclosure

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

May 18, 2007

Ms. Astoria Ridley
Reference Librarian
New Haven Free Public Library
Ives Branch
133 Elm Street
New Haven, CT 06510

Dear Ms. Ridley,

I request your assistance in making the enclosed notice and associated materials available for public inspection from May 29th, 2007, through June 29th, 2007. The materials contain information concerning a proposed revision to the State Implementation Plan to request that EPA allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

The Department will submit the revision to the U.S. Environmental Protection Agency for review and approval as a revision to the State Implementation Plan pursuant to the Clean Air Act Amendments of 1990. After June 29th, 2007, you may dispose of the materials as you see fit.

Please call me at (860) 424-3458 if you have any questions. Thank you for your assistance in this matter.

Cordially,

Elizabeth McAuliffe
Environmental Analyst
Bureau of Air Management

Enclosure

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

May 18, 2007

Ms. Sylvia Boyd
Reference Librarian
Bridgeport Public Library
925 Broad Street
Bridgeport, CT 06604

Dear Ms. Boyd,

I request your assistance in making the enclosed notice and associated materials available for public inspection from May 29th, 2007, through June 29th, 2007. The materials contain information concerning a proposed revision to the State Implementation Plan to request that EPA allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

The Department will submit the revision to the U.S. Environmental Protection Agency for review and approval as a revision to the State Implementation Plan pursuant to the Clean Air Act Amendments of 1990. After June 29th, 2007, you may dispose of the materials as you see fit.

Please call me at (860) 424-3458 if you have any questions. Thank you for your assistance in this matter.

Cordially,

Elizabeth McAuliffe
Environmental Analyst
Bureau of Air Management

Enclosure

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Robert W. Varney
Regional Administrator
United States Environmental Protection Agency
Region I, EPA New England
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

Re: ***Proposed Revision of Connecticut's State Implementation Plan – Reasonably Available Control Technology for volatile organic compound emissions***

Dear Mr. Varney:

In accordance with the provisions of Title 40 Code of Federal Regulations Section 51.102, the enclosed notice for public hearing and associated materials are being forwarded for your information.

The hearing notice concerns a revision to the State Implementation Plan to request that the U.S. Environmental Protection Agency (EPA) allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

Please feel free to comment on this information or contact me at (860) 424-3026 if you have any questions.

Sincerely yours,

May 17, 2007
Date

Anne R. Gobin, Chief
Bureau of Air Management

Enclosures
cc: David Conroy, Air Programs Branch Chief

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Brian Carra
Environmental Health & Safety Manager
Sumitomo Bakelite North America, Inc.
24 Mill Street
Manchester, CT 06040

Re: ***Proposed Revision of Connecticut's State Implementation Plan - Reasonable Available Control Technology for volatile organic compound emissions***

Dear Mr. Carra:

In accordance with the provisions of Title 40 Code of Federal Regulations Section 51.102, the enclosed notice for public hearing and associated materials are being forwarded for your information.

The hearing notice concerns a revision to the State Implementation Plan to request that the U.S. Environmental Protection Agency (EPA) allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

Please feel free to comment on this information or contact me at (860) 424-3702 if you have any questions.

Sincerely,

Elizabeth McAuliffe
Environmental Analyst
Engineering & Enforcement Division
Bureau of Air Management

Enclosures

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

William F. Peck
Senior Vice President
Curtis Packaging Corporation
44 Berkshire Rd.
Newton, CT 06482

Re: ***Proposed Revision of Connecticut's State Implementation Plan - Reasonable Available Control Technology for volatile organic compound emissions***

Dear Mr. Peck:

In accordance with the provisions of Title 40 Code of Federal Regulations Section 51.102, the enclosed notice for public hearing and associated materials are being forwarded for your information.

The hearing notice concerns a revision to the State Implementation Plan to request that the U.S. Environmental Protection Agency (EPA) allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

Please feel free to comment on this information or contact me at (860) 424-3702 if you have any questions.

Sincerely,

Elizabeth McAuliffe

Elizabeth McAuliffe
Environmental Analyst
Engineering & Enforcement Division
Bureau of Air Management

Enclosures

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Mr. Edward M. Olson
Plant Manager
CYRO Industries
South Cherry Street
Wallingford, Connecticut 06492

Re: ***Proposed Revision of Connecticut's State Implementation Plan - Reasonable Available Control Technology for volatile organic compound emissions***

Dear Mr.Olson:

In accordance with the provisions of Title 40 Code of Federal Regulations Section 51.102, the enclosed notice for public hearing and associated materials are being forwarded for your information.

The hearing notice concerns a revision to the State Implementation Plan to request that the U.S. Environmental Protection Agency (EPA) allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

Please feel free to comment on this information or contact me at (860) 424-3702 if you have any questions.

Sincerely,

Elizabeth McAuliffe
Environmental Analyst
Engineering & Enforcement Division
Bureau of Air Management

Enclosures

Exhibit 3

DELEGATION OF HEARING OFFICER

In accordance with the provisions of section 22a-2 of the Connecticut General Statutes, Elizabeth McAuliffe of the Bureau of Air Management is hereby appointed as Hearing Officer. The purpose of this delegation is to allow said Officer to conduct a hearing on June 29th, 2007 and to render a proposed decision regarding a proposed revision of the State Implementation Plan (SIP) for air quality required by the Clean Air Act Amendments of 1990 (CAA). This SIP revision will be submitted to the U.S. Environmental Protection Agency (EPA) for review and approval pursuant to CAA.

The purpose of this revision is to allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

May 15, 2007
Date

Amey Marrella
fo/ Gina McCarthy
Commissioner

HEARING CERTIFICATION

This is to certify that in accordance with the provisions of Title 40 Code of Federal Regulations Part 51.102, the following actions occurred:

1. On May 29, 2007, the Department of Environmental Protection (Department) caused to be published a notice of intent to revise the State Implementation Plan for Air Quality (SIP). This proposed SIP revision includes Trading Agreements and Orders and Consent Orders that: The purpose of this revision is to allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

2. In accordance with such notice, materials related to the public hearing were available for inspection and review in each Air Quality Control Region in the State of Connecticut;

3. In accordance with such notice, the Department held a public hearing on June 29, 2007, at the offices of the Department at 79 Elm Street, Hartford CT;

4. Copies of the proposed SIP revision were mailed and received, prior to or on May 29, 2007, by the Directors of the air pollution control agencies in New York, New Jersey, Massachusetts and Rhode Island;

5. Copies of the proposed SIP revision were mailed and received on May 29, 2007, by the Office of Ecosystem Protection, EPA New England.

6. The public notice was published as follows:

Newspaper	AQCR	Date
Connecticut Post	43	May 29, 2007
New London Day	41	May 29, 2007
The Register Citizen	44	May 29, 2007
Hartford Courant	42	May 29, 2007

7/18/07
Date

Elizabeth I. H. McAuliffe
Environmental Analyst III
Bureau of Air Management

Hearing Report

Hearing Date: June 29, 2007
Hearing Officer: Elizabeth McAuliffe

Revision to:
The Connecticut State Implementation Plan for Air Quality concerning the following Consent Orders.

Curtis Packaging Corporation	Consent Order No. 8270
Sumitomo Bakelite North America, Inc.	Consent Order No. 8245
Cyro Industries	Consent Order No. 8268

I. Summary

On May 29, 2007, the Connecticut Department of Environmental Protection (Department) published a notice of intent to revise the State Implementation Plan (SIP) for air quality through Orders and Modifications. The purpose of this revision is to allow manufacturing operations to implement Reasonably Available Control Technology through a compliance plan or an alternative compliance plan for volatile organic compound emissions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

The proposed SIP revision was the subject of a public hearing held on Friday, June 29, 2007, in the Holcombe Room at 79 Elm Street, Hartford, Connecticut. The Department delegated hearing officer was Elizabeth McAuliffe. In attendance at the hearing were Elizabeth McAuliffe of the Department, Steve Franke from Cyro Industries, Thomas Armstrong for Curtis Packaging and Brian Cane for Sumitomo Bakelite North America, Inc. There were no oral comments at the hearing. Written comments were accepted until 4:30 PM, June 29, 2007.

This hearing report includes a summary of written comments on the proposed SIP revision, the Department's response to the comments and any recommended changes to the proposed SIP revision. A transcription of the hearing and copies of the written comments received are available from the Department upon request.

II. Written Comments

Written comments were received by the Department on the proposed SIP revision as identified as A, B and C, as follows:

A. Comment dated June 28, 2007, concerning Cyro Industries, Curtis Packaging and Sumitomo Bakelite North America, Inc., Environmental Protection Agency (EPA) contact: Anne Arnold, 617-918-1046. EPA previously had the opportunity to review and comment on drafts of each of these orders. EPA has reviewed the proposed orders and has found that all of their previous comments have been adequately addressed. These

orders should be submitted to EPA as source specific SIP revisions pursuant to Section 22a-174-32 of the Regulations of Connecticut State Agencies.

Response to Comment A: Based upon this comment submitted to the Department concerning the proposed SIP revision, I recommend such orders be submitted by the Commissioner of Environmental Protection to the Administrator of EPA as a revision to the Connecticut SIP for Air Quality.

B. Comment dated June 28, 2007, concerning 8270, for Curtis Packaging, Reid and Riege contact: Thomas Armstrong (860) 278-1150. The company wishes to inform the hearing officer that new presses have been installed with lower emitting printing technologies. As of March 2007, the printing equipment inventory included two Rapida Model 130A-7 presses and one Rapida Model 130A-8. The presses listed in the Order are those that were in operation at the time of drafting the Alternate Compliance Plan submitted to DEP on December 17, 2002.

Response to Comment B: Based upon this comment submitted to the Department concerning the proposed SIP revision for Order 8270, I recommend that Order 8270 be incorporated into the SIP as originally issued on May 1, 2007. Subsequently, the Department plans to change consent order language in paragraph A.2 of Order 8270 to generally cover all sheet-fed offset lithographic printing presses owned and operated by Curtis. The new or revised Order 8270 must then be reviewed and approved as part of the SIP.

C. Comment dated June 28, 2007, concerning 8270, for Curtis Packaging, Reid and Riege contact: Thomas Armstrong (860) 278-1150. It is recommended that under the heading "Consent Order No. 8270" in the SIP description that the third sentence be deleted and the following inserted, "In 2002, the facility commenced reformulation by replacing alcohol additives in fountain solutions with non-alcohol additives and conventional oil-based inks with UV cured inks and eliminated high VOC containing cleaning solvents seeking to achieve the requirements of the final Control Technique Guidelines (CTG) issued by EPA for lithographic printing on October 5, 2006." Additional clarification is sought as noted in italized text that follows, "...3. Use of UV cured inks as opposed to conventional oil-based inks,"

Response to Comment C: Based upon this comment submitted to the Department concerning the proposed SIP revision for Order 8270, I recommend that the SIP Description be changed accordingly as the information was verified by the Department to be accurate and true. Attached is the revised SIP Description. The changes are simply for clarification purposes and do not materially impact the emissions reductions achieved in the order and do not impact the enforceability of Order 8270.

III. Oral Comment

There were no oral comments received by the Department on the proposed SIP revision.

IV. Conclusion

Based upon the comments submitted to the Department and the responses addressed in this hearing report, I recommend the proposed SIP revision be submitted by the Commissioner of Environmental Protection to the EPA Administrator as a revision to the Connecticut State Implementation Plan for Air Quality, along with the above mentioned change to the SIP narrative indicated in response C.

7/17/2007
Date

Elizabeth I. H. McAuliffe
Hearing Officer

Exhibit 4

SIP Description – Curtis Packaging Corporation – Consent Order 8270

SIP Description of Enforceable Operating Conditions

On May 1, 2007, the Commissioner of the Department of Environmental Protection issued Consent Order No. 8270 to Curtis Packaging Corporation. The order established enforceable operating procedures for the control of volatile organic compound (VOC) emissions from the facility.

This SIP action is proposed to satisfy the requirements of Section 22a-174-32(e)(6) of the Regulations of Connecticut State Agencies (Regulations). Specifically, Consent Order No. 8270 is being presented to the Administrator for approval in accordance with the provisions of 42 U.S.C. 7401-7671, et seq.

Consent Order No. 8270:

Curtis Packaging Corporation manufactures custom designed paperboard and cardboard packaging for their customers. The associated process equipment consists of three sheet-feed offset lithographic printing presses; Harris L.V.F, Rapida Model 130A-7 and Press No. 29. In 2002, the facility commenced reformulation by replacing alcohol additives in fountain solutions with non-alcohol additives and conventional oil-based inks with UV cured inks and eliminated high VOC containing cleaning solvents seeking to achieve the requirements of the final Control Technique Guidelines (CTG) issued by EPA for lithographic printing on October 5, 2006. The VOC reduction achieved, however, appeared not to be greater than implementing add-on controls or a program of reformulations as required by Section 22a-174-32(e)(4) of the Regulations. Consequently, the facility requested the issuance of an order to implement an Alternative Compliance Plan in accordance with Section 22a-174-32(e)(6) of the Regulations, claiming that additional VOC emission reductions achieved by installing air pollution control equipment were technically and economically infeasible. The Department approved the facility's claim that the installation of additional emission control equipment was technically and economically infeasible and negotiated the issuance of Consent Order No. 8270.

Consent Order No. 8270 limits operations at Curtis Packaging Corporation as follows:

1. The fountain solutions should contain no alcohol additive;
2. The VOC concentration in the fountain solution shall be 5.0% or less by weight, as applied;
3. Use UV cured inks as opposed to conventional oil-based inks;
4. Cleaning solution is limited to 30% by weight VOC or a VOC composite partial pressure of 10mmHg or less at 20 degrees Celsius;
5. Submit a plan to test the fountain solution VOC composition; and
6. The facility shall make and keep as specified in the order to demonstrate compliance with the material content limits and the approved test plan of this

order.

The above material content limits comply with the lithographic printing CTG, which asserts that a 70% VOC emissions reduction can potentially be achieved through such reformulation efforts.

In conclusion, this action is proposed to implement an Alternative Compliance Plan for RACT for VOC emissions pursuant to Section 22a-174-32(e)(6) of the Regulations and 42 U.S.C. 7401-7671, et seq.

SIP Description – CYRO Industries – Consent Order 8268

SIP Description of Enforceable Operating Conditions

On February 28, 2007, the Commissioner of the Department of Environmental Protection issued Consent Order No. 8268 to CYRO Industries. The order established enforceable operating conditions for the control of Volatile Organic Compound (VOC) emissions from the facility.

This SIP action is proposed to satisfy the requirements of Section 22a-174-32(e)(6) of the Regulations of Connecticut State Agencies. Specifically, Consent Order No. 8268 is being presented to the Administrator for approval in accordance with the provisions of 42 U.S.C. 7401-7671, et seq.

Consent Order No. 8268:

CYRO Industries, a wholly owned subsidiary of Degussa Corporation, manufacturers extruded polymer pellets that can be shaped and/or molded by end users into various products. VOC emitting process equipment is described as; raw material storage tanks/vessels, monomer preparation, polymer production extrusion lines, grafted rubber preparation, solvent recovery operations, dye preparation, post color operations, miscellaneous small, fossil-fuel fired process and space heating units, Equipment leaks and fugitive emissions.

The facility was formerly owned and operated by American Cyanamid. When American Cyanamid owned the facility, actual emissions of VOCs from the facility exceeded 100 tons per year, which triggered applicability of Subsection 22a-174-20(ee) of the Regulations of Connecticut State Agencies. Consequently, the Department issued State Order No. 8012 to implement Reasonably Available Control Technology (RACT) for VOCs. State Order No. 8012 required American Cyanamid to install emissions control equipment capable of achieving an 85% reduction of uncontrolled VOC emissions from select pieces of equipment. Additionally, State Order No. 8012, capped VOC emissions from those pieces of equipment that were not ducted to emission control equipment.

CYRO Industries took ownership of the facility in May of 2005, at which time, it was determined that CYRO was subject to RACT for VOCs pursuant to Section 22a-174-32 of the RCSA. CYRO submitted a compliance plan to implement RACT for VOCs. In the plan, CYRO requested the approval of an Alternative Compliance Plan pursuant to Subsection 22a-174-32(e)(6) of the RCSA. CYRO asserted that RACT for its equipment had already been determined for the emission units when the Department issued State Order No. 8012 to American Cyanamid. CYRO also asserted that further control of VOC emissions from the facility would be technically and economically infeasible and unnecessary since the facility is also subject to the National Emissions Standards for Hazardous Air Pollutants from amino/phenolic resin process. After reviewing CYRO

Industries' compliance plan and the case file for State Order No. 8012, the Department of Environmental Protection drafted and issued Consent Order No. 8268.

Consent Order No. 8268 updates the equipment and processes described in State Order No. 8012 and ensures that uncontrolled VOC emissions are reduced by no less than 85%. Additionally, Consent Order 8268 requires record keeping and periodic emissions testing to demonstrate compliance with the requirement to reduce uncontrolled emissions by 85%.

In conclusion, this action is proposed to implement an Alternative Compliance Plan for RACT for VOC emissions pursuant to Section 22a-174-32(e)(6) of the Regulations and 42 U.S.C. 7401-7671, et seq.

SIP Description – Sumitomo Bakelite North America, Inc. – Consent Order 8245

SIP Description of Enforceable Operating Conditions

On October 11, 2006, the Commissioner of the Department of Environmental Protection issued Consent Order No. 8245 to Sumitomo Bakelite North America, Inc. The order established enforceable operating conditions for the control of Volatile Organic Compounds Emissions from the facility.

This SIP action is proposed to satisfy the requirements of Section 22a-174-32(e)(6) of the Regulations of Connecticut State Agencies. Specifically, Consent Order No. 8245 is being presented to the Administrator for approval in accordance with the provisions of 42 U.S.C. 7401-7671, et seq.

Consent Order No. 8245:

Sumitomo Bakelite, formerly Vyncolit North American, Inc., manufactures fiberglass impregnated and resinous pellets that can be shaped or molded by end users into various products. Affected Process equipment is described as process lines; GLP1, GLP2, EXT1, EXT2, EXT3, EXT 4 and DAP. The facility attempted to meet the requirements for Reasonably Available Control Technology (RACT) for volatile organic compounds (VOC) by reformulating its existing products to reduce the amount of VOC emitted per unit of production by 76%. However, the 76% reduction was insufficient to meet presumptive RACT or the requirements of Section 22a-174-32(e)(2) of the Regulations of Connecticut State Agencies (Regulations). Consequently, the facility requested the issuance of an order to implement an Alternative Compliance Plan in accordance with Section 22a-174-32(e)(6) of the Regulations, claiming that additional VOC emission reductions achieved by installing air pollution control equipment were technically and economically infeasible. The Department approved the facility's claim that the installation of additional emission control equipment was technically and economically infeasible and negotiated the issuance of Consent Order No. 8245.

Consent Order No. 8245 limits operations at Sumitomo Bakelite North American, Inc. as follows:

1. Actual emissions of VOC shall not exceed 45 tons during any period of 12 consecutive months;
2. Monthly emissions of VOC shall not exceed 8,889 pounds during any calendar month;
3. Except for during the blending process, only non-VOC and/or exempt VOC materials shall be used in process lines EXT2 and EXT3;
4. The vapor pressure of all materials used during the blending process shall be less than or equal to 1.0mm Hg at 18.5 degrees Celsius;
5. Only non-VOC and /or exempt VOC products may be used in the manufacture of DAP products;

6. Only non-VOC and /or exempt VOC products may be used in process line EXT1;
7. Emissions of VOC from new, non-extruded products shall not exceed 0.006 pounds of VOC/pound of non-extruded product produced;
8. The facility shall continually investigate and apprise the Department of the feasibility of only using nn-VOC and/or exempt VOC materials in all phases of the production of non-extruded products, except the blending phase;
9. The facility shall make and keep records as specified in the order to demonstrate compliance with the material content and emissions limits of the order; and
10. The facility shall submit annual reports verifying the determination of emissions factors used to record annual emissions from the Facility.

The operating limits, emission limits, and material VOC content limits of the order serve to ensure that Sumitomo Bakelite North American maintains the 76% reduction in the VOC emissions per pound of product manufactured, which was achieved through its material reformulation efforts.

In conclusion, this action is proposed to implement an Alternative Compliance Plan for RACT for VOC emissions pursuant to Section 22a-174-32(e)(6) of the Regulations and 42 U.S.C. 7401-7671, et seq.

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OF CONNECTICUT	)	
	)	
VS.	)	CONSENT ORDER NO. 8245
	)	
SUMITOMO BAKELITE NORTH AMERICA, INC.)		

CONSENT ORDER

A. With the agreement of Sumitomo Bakelite North American, Inc. ("Respondent") the Commissioner of Environmental Protection ("Commissioner") finds the following:

1. The Respondent is a corporation doing business in the manufacturing of thermoset molding compounds at 24 Mill Street, Manchester, Connecticut ("facility").

2. At the facility, the Respondent maintains and operates the following VOC emitting equipment: Process lines "GLP1," "GLP2," "EXT1," "EXT2," "EXT3," "EXT4" and "DAP."

   a. All of the above VOC emitting equipment, except for the EXT1 process line, uses Volatile Organic Compounds ("VOC") to manufacture those molding compounds referenced in paragraph A.1 of this Consent Order.

   b. Line EXT4 operates in accordance with New Source Review Permit No. 097-0049.

3. Pursuant to Section 22a-174-32 of the Regulations of the Connecticut Sate Agencies ("Regulations"), subject premises with potential VOC emissions greater than fifty (50) tons per year are subject to the provisions in Section 22a-174-32 of the Regulations.

4. In 2002, Rogers Corporation, the former owner, reported that actual and potential emissions of VOC from the facility were greater than 50 tons for calendar years 1996 and 1997; therefore the facility is subject to the provisions of Section 22a-174-32 of the Regulations.

5. Pursuant to Section 22a-174-32(e) of the Regulations, the Respondent is required to reduce the facility's VOC emissions by implementing one of the Reasonably Available Control Technology ("RACT") methods specified in Sections 22a-174-32(e)(1)-(6) of the Regulations.

6. Pursuant to Section 22a-174-32(e)(6) of the Regulations, Rogers Corporation submitted a VOC RACT Compliance Plan, specifically, an Alternative Compliance Plan ("ACP") dated October 17, 2002.

   a. On July 7, 2003, the Respondent revised the plan referenced in paragraph A.6 of this Consent Order and resubmitted it for the Commissioner's review and approval.

   b. The revised VOC RACT plan has been reviewed and is hereby approved by the Commissioner with the conditions specified in paragraph B of this Consent Order.

7. According to Respondent's ACP:

   a. In January 2002, Respondent reformulated and reduced the facility's VOC emissions by 76% from the baseline year of 1990.

   b. The installation of additional control equipment is technically or economically infeasible.

   c. RACT for the facility should reflect the VOC emissions reduction from reformulating.

B. The Commissioner, acting under Sections 22a-6, 22a-171, 22a-174, 22a-177, and 22a-178 of the Connecticut General Statutes, orders the Respondent as follows:

1. Upon issuance of this Consent Order, Respondent shall limit the total emission of VOCs from the DAP, GLP1, GLP2, EXT1, EXT2, EXT3 and EXT4 lines to less than forty-five (45) tons per year:

   a. Notwithstanding paragraph B.1.b of this Consent Order, the maximum annual VOC emissions shall be based on any consecutive twelve (12) month time period and shall be determined by adding each month's VOC emissions to that of the previous eleven (11) months.

   b. Total maximum monthly VOC emissions from the DAP, GLP1, GLP2, EXT1, EXT2, EXT3 and EXT4 lines shall not exceed eight thousand and eight hundred and eighty-nine (8,889) pounds, which is 1.2 times the average allowable monthly VOC emissions of seven thousand and five hundred (7,500) pounds.

2. Except for in the process of blending product batches, the Respondent shall only use "non-VOC solvents," which term hereinafter means "0%" VOC, or solvents that contain only exempt VOCs to manufacture those compounds that are extruded in process lines EXT2 and EXT3. The Respondent shall keep a list of those compounds and record the product names, product ingredients including the solvents used and the date of manufacture when producing these extruded compounds.

In the process of blending product batches, the Respondent shall use only VOC solvents with a vapor pressure less than or equal to 1.0 mmHg at 18.5 degrees Celsius.

3. The Respondent shall use acetone, other exempt VOC solvents or solvents that do not contain VOCs in the manufacturing of DAP products. Exempt VOC compounds are defined as those compounds explicitly excluded from the definition of "VOC" in 40 CFR 51.100(s).

4. The Respondent shall not use any VOC solvents in the EXT1 line.

5. Within thirty (30) days from issuance of this Consent Order, the Respondent shall submit, to be added to this Consent Order as an Addendum, a list of those compounds that were not reformulated. The compounds included on this list will be considered "existing products" for purpose of this Consent Order. Each of these product compounds should list the pounds of VOC emitted per pound of product. Any product that is not an "existing product" but is later manufactured by the Respondent will be considered a "new product" for purposes of this Consent Order.

6. Except for the process of blending product batches, the Respondent shall investigate the feasibility of using non-VOC solvents in the manufacturing of any new, non-extruded products developed subsequent to the effective date of this Consent Order. Where it is technically and economically feasible, the Respondent shall use non-VOC solvents to manufacture new, non-extruded products at the facility.

7. The Respondent shall keep records documenting the investigation referenced in paragraph B.6 of this Consent Order for any new, non-extruded products manufactured at the facility. The Respondent may use VOC solvent(s) to manufacture new, non-extruded products provided that the VOC emitted is less than 0.006 pounds of VOC per pound of product.

   Except for in the process of batch blending, for any new, non-extruded products demonstrating the need to use VOC solvents that will emit VOC emissions greater than 0.006 pounds of VOC per pound of product, the Respondent shall submit a report detailing the technical and economic issues of using non-VOC solvent(s) to the Department and the EPA and obtain the Commissioner's and the Administrator's written approval prior to the use of such solvent(s).

8. Within thirty (30) days from issuance of this Consent Order, the Respondent shall submit for the Commissioner's and EPA's review and written approval detailed methodology for determining product based emission factors. Any change to the approved emission factors methodology that is expected to increase emissions must be approved by the Commissioner and EPA in writing prior to such change.

9. Record Keeping.

   a. In accordance with §22a-174-32(g) of the Regulations, the Respondent shall make and keep such records that are necessary to reliably calculate actual monthly and annual emissions for the subjected lines in order to demonstrate compliance with paragraphs B.1.a and B.1.b of this Consent Order. Such records shall be created for each calendar month and each consecutive 12-month period by keeping the following daily information, segregated by process line, in 1-8 below:

      1. Description of solvent, including name and density (#/gal).
      2. Volume of solvent used in gallons.
      3. VOC content by weight (# VOC/gal) of solvent used.
      4. Water and exempt VOC content by weight of material used.
      5. Non-volatile content by volume and by weight of material used.
      6. Quantity of products in pounds.
      7. VOC emissions in pounds and tons.
      8. Product name and production date.

   b. On or before December 31st of each year and in accordance with the approved method referenced in paragraph B.8 of this Consent Order, the Respondent shall review and verify all emission factors used, including for new products, to calculate the facility's VOC emissions. The Respondent shall keep records documenting the review and study for each derived emission factor.

   c. Respondent shall keep each record required by this Consent Order at the premise for five years after the date that such record is made and shall make these records available to the Commissioner and/or EPA upon request.

10. Reporting Requirements. Respondent shall submit to the Commissioner an annual VOC emissions summary report using records made in accordance with paragraph B.9. of this Consent Order. The report shall contain the annual emission of VOCs, expressed in tons per year. The emissions shall be reported for each and every month and each and every consecutive 12-month period, which ended during the previous calendar year, expressed as a twelve-month aggregate. The report shall be submitted to the Commissioner on or before March 1st of every calendar year. The reports shall be sent to the:

    DEP Bureau of Air Management
    Compliance Analysis and Coordination Unit
    79 Elm Street, 5th floor
    Hartford, CT 06106-5127

11. Full compliance. Respondent shall not be considered in full compliance with this Consent Order until all actions required by this Consent Order have been completed as approved and to the Commissioner's satisfaction.

12. Approvals. Respondent shall use best efforts to submit to the Commissioner all documents required by this Consent Order in a complete and approvable form. If the Commissioner notifies Respondent that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and Respondent shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within 30 days of the Commissioner's notice of deficiencies. In approving any document or other action under this Consent Order, the Commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purposes of this Consent Order. Nothing in this paragraph shall excuse noncompliance or delay.

13. Definitions. As used in this Consent Order, "Commissioner" means the Commissioner or a representative of the Commissioner.

14. Dates. The date of "issuance" of this Consent Order is the date the Consent Order is deposited in the U.S. mail or personally delivered, whichever is earlier. 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 deposited in the U.S. mail or is personally delivered, 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 a Connecticut or federal holiday shall be submitted or performed by the next day which is not a Saturday, Sunday or Connecticut or federal holiday.

15. 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 Respondent or, if Respondent is not an individual, by Respondent's chief executive officer or a duly authorized representative of such officer, as those terms are defined in §22a-430-3(b)(2) of the Regulations of Connecticut State Agencies, and by the individual(s) responsible for actually preparing such document, and Respondent or Respondent's chief executive officer and each such individual shall certify in writing as follows: "I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information is punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law."

16. Noncompliance. This Consent Order is a final order of the Commissioner with respect to the matters addressed herein, and is nonappealable and immediately enforceable. Failure to comply with this Consent Order may subject Respondent to an injunction and penalties.

17. False statements. Any false statement in any information submitted pursuant to this Consent Order is punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law.

18. Notice of transfer; liability of Respondent. Until Respondent has fully complied with this Consent Order, Respondent shall notify the Commissioner in writing no later than 15 days after transferring all or any portion of the facility, the operations, the site or the business which is the subject of this Consent Order or after obtaining a new mailing or location address. Respondent's obligations under this Consent Order shall not be affected by the passage of title to any property to any other person or municipality.

19. Commissioner's powers. Except as provided hereinabove with respect to payment of civil penalties, 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 past, present, or future violations of law. If at any time the Commissioner determines that the actions taken by Respondents pursuant to this Consent Order have not successfully corrected all violations, fully characterized the extent or degree of any pollution, or successfully abated or prevented pollution, the Commissioner may institute any proceeding to require Respondents to undertake further investigation or further action to prevent or abate violations or pollution.

20. Respondent's obligations under law. Nothing in this Consent Order shall relieve Respondent of other obligations under applicable federal, state and local law.

21. 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 and abate pollution.

22. Access to site. Any representative of the Department of Environmental Protection and the U.S. Environmental Protection Agency may enter the facility without prior notice for the purposes of monitoring and enforcing the actions required or allowed by this Consent Order.

23. No effect on rights of other persons. This Consent Order neither creates nor affects any rights of persons or municipalities that are not parties to this Consent Order.

24. Notice to Commissioner of changes. Within 15 days of the date Respondent become 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.

25. 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 requirement of this Consent

Order or of any document required hereunder, Respondent shall immediately notify by telephone the individual identified in the next paragraph 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. Within five (5) days of the initial notice, Respondent shall submit in writing the date, time, and duration of the noncompliance and 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. Any written approval of noncompliance by the Commissioner pursuant to the terms of this order shall operate solely as a matter of state law.

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

Compliance Analysis and Coordination Unit
Department of Environmental Protection
Bureau of Air Management
79 Elm Street
Hartford, Connecticut 06106-5127

Respondent consents to the issuance of this Consent Order without further notice.

Sumitomo Bakelite North America, Inc.

Signature: Barbara A. Olson

Type Name: BARBARA A. OLSON

Type Title: DIRECTOR MANUFACTURING &TECHNOLOGY

Date: 9-12-06

Issued as a final order of the Commissioner of Environmental Protection.

Gina McCarthy
Commissioner

10/11/06
Date

CITY OF MANCHESTER
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RETURN RECEIPT REQUESTED
Certified Document No. -

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OF CONNECTICUT	)	
	)	
AND	)	CONSENT ORDER NO. 8268
	)	
CYRO INDUSTRIES	)	

CONSENT ORDER

A. With the agreement of CYRO Industries ("Respondent") the Commissioner of Environmental Protection ("Commissioner") finds the following:

1. Respondent is a wholly owned subsidiary of Degussa Corporation that produces acrylic polymer materials at South Cherry Street in Wallingford, Connecticut ("facility").

2. The Respondent has operated the facility since November 2005.

3. At the facility, the Respondent operates the following processes:

   A. Raw Material Storage Tanks/Vessels
   B. Monomer Preparation
   C. Polymer Production
   D. Grafted Rubber Preparation
   E. Solvent Recovery Operations
   F. Dye Preparation
   G. Post Color Operations
   H. Equipment leaks and fugitive emissions

4. Respondent formerly operated the facility as a joint venture with Cytec Industries. At that time Cytec Industries was responsible for environmental compliance assurance activities at the facility.

5. Cytec Industries acquired the facility in 1994 from American Cyanamid Company.

6. In or around 1986, American Cyanamid operated equipment at the facility that emitted greater than 100 tons of volatile organic compounds.

7. Section 22a-174-20(ee) of the Regulations of Connecticut State Agencies ("RCSA") required American Cyanamid to implement "Reasonably Available Control Technology" ("RACT") for volatile organic compound ("VOC") emissions. In accordance with Section 22a-174-20(ee) of the RCSA, the Department issued Order #8012, which specified RACT for VOC emissions from American Cyanamid's facility.

8. When Cytec Industries acquired the facility, it continued to operate the same emissions units that were subject to the RACT requirements of Order #8012. Similarly, the emissions units that are now operated by the Respondent were subject to the RACT requirements of Order #8012.

9. Pursuant to the memorandum entitled "Once-in/Always-in" Requirement for Applicability (dated August 23, 1990 and issued by the U.S. Environmental Protection Agency), once emissions from an emission unit exceed the applicability cutoff for a particular VOC regulation (e.g. Section 22a-174-20(ee) of the RCSA) that emission unit is always subject to the control requirements of the regulation.

10. The emissions units, which were formerly owned and operated by American Cyanamid, that are currently owned and operated by the Respondent, are subject to RACT for VOC emissions in accordance with Section 22a-174-20(ee) of the RCSA. However, the Respondent is not a party to Consent Order #8012 and is therefore not subject to the requirements of Consent Order #8012.

11. On November 18, 1993, Section 22a-174-20(ee) of the RCSA was amended to state that sources subject to RACT in accordance with Section 22a-174-20(ee) shall implement RACT pursuant to Section 22a-174-32 of the RCSA.

12. The Respondent must implement RACT for VOC emissions, in accordance with Section 22a-174-32 of the RCSA from those emission units that were formerly owned by American Cyanamid.

13. To ensure that the State of Connecticut maintains its progress towards attainment of the National Ambient Air Quality Standards for Ozone, the level of VOC emission control determined as RACT for the Respondent must be at least as stringent as the level of VOC emission control required of American Cyanamid.

14. In accordance with Subsection 22a-174-32(d) of the RCSA, the Respondent submitted a VOC RACT Compliance Plan describing its production processes, its emission units, the associated uncontrolled emissions and a proposal to use a VOC capture and recovery device, an activated carbon adsorption unit, to control emissions of VOC.

B. The Commissioner, acting under Sections 22a-6, 22a-171, 22a-174, 22a-177, and 22a-178 of the Connecticut General Statutes, orders the Respondent as follows:

1. The Respondent shall not place, store, or hold in any stationary storage vessel with a capacity between 100 gallons and 10,000 gallons, any volatile organic compounds with a vapor pressure of 0.40 pounds per square inch or greater under actual storage conditions unless such vessel is either:

   a. Equipped with a permanent submerged fill pipe with a discharge point eighteen inches or less from the bottom of the storage vessel, or
   b. Equipped with a pressure/vacuum conservation vent to minimize evaporation of tank contents.

2. The Respondent shall not place, store, or hold in any stationary storage vessel with a capacity equal to or greater than 10,000 gallons, any volatile organic compounds with a vapor pressure of 0.40 pounds per square inch or greater under actual storage conditions unless such vessel is either:

   a. Equipped with a vapor recovery system that collects all volatile organic compound vapors and gases discharged from the tank and a vapor return or disposal system that is designed to process such vapors so as to reduce their emission to the atmosphere by at least 95% by weight.
   b. Other equipment capable of achieving emissions reductions equivalent to those required in accordance with Paragraph B.2.a of this Consent Order

3. At all times, the Respondent shall operate and maintain a VOC capture and recovery device or devices, which shall continually achieve, at least, an 85% reduction in uncontrolled emissions from the following processes:
   a. Monomer Preparation
   b. Polymer Production
   c. Grafted Rubber Preparation
   d. Solvent Recovery Operations
   e. Dye Preparation
   f. Post Color Operation

   The Respondent shall not allow VOC emissions from the VOC capture and recovery device(s) to exceed 10% of the mass of VOC entering the control system.

4. Leak Detection and Repair (LDAR): Notwithstanding, the provisions of Paragraph 22a-174-20(x)(2) of the RCSA and Subparagraph 22a-174-20(x)(13)(A) of the RCSA, the Respondent shall perform LDAR activities in accordance with either Subsections 22a-174-20(x)(3) - 22a-174-20(x)(13)(F) of the RCSA or applicable LDAR standards set forth in Parts 61 or 63 of Title 40 of the Code of Federal Regulations; whichever is more stringent.

5. Operations and Maintenance Plan: Within ninety (90) days after the issuance of this consent order, the Respondent shall submit, for the Commissioner's review and written approval, an Operations and Maintenance Plan for the equipment required in Paragraph B.2 of this consent order and the VOC capture and recovery devices required in Paragraph B.3 of this consent order. Such plan shall include, but not be limited to the following: Operating procedures, parameters to be monitored to indicate compliance with the requirements of Paragraphs B.2 and B.3 of this Consent Order, acceptable ranges of values for the parameters to be monitored, the monitoring frequency, a description of the schedule of adsorption media regeneration or solvent recovery cycles, a schedule of periodic maintenance events, and operator training. The Respondent shall operate and maintain the VOC capture and recovery devices required in Paragraphs B.2 and B.3 in accordance with the approved Operations and Maintenance Plan and Paragraphs B.2 and B.3 of this Consent Order. Prior to implementing any change to the Operations and Maintenance Plan that may increase emissions or reduce the overall control efficiency of the devices required in Paragraphs B.2 and B.3, the Respondent shall submit such changes to the Commissioner and the US EPA, in writing, and obtain written approval from both the Commissioner and the US EPA.

6. Emissions Calculation Methodology: Within ninety (90) days after the date of issuance of this Consent Order, the Respondent shall submit a detailed emission calculation document which shall describe the methods used to calculate actual emissions from all the VOC-Emitting processes operated at the facility. The emissions calculation document shall be subject to the review and written approval of the Commissioner. The document shall provide references for any emissions models used, the data inputs for any such model, a listing of emissions factors used, and the sources of any emissions factors used. The Respondent shall calculate and record emissions in accordance with the emissions calculation document approved by the Commissioner and the US EPA. The Respondent shall not alter the method of calculating emissions until the Respondent submits the alteration to the Commissioner and the US EPA, in writing, and obtains the Commissioner's and the US EPA's approval of the alteration in writing.

7. Record Keeping and Reporting. The Respondent shall make and keep records of the following:

   A. All manufacturer's literature, operating manuals, and warranty information pertaining to VOC capture and recovery device(s),

   B. Material Safety Data Sheets for all raw materials that result in the emission of Volatile Organic Compounds

C. A log of all maintenance and repair events performed on VOC capture and recovery devices specified in Paragraphs B.2 and B.3, which shall include: a description of the event, the date the event occurred, and a list of parts repaired and or replaced during the event.

D. In accordance with the frequency specified in the Operations and Maintenance Plan that is approved in accordance with Paragraph B.5 of this Consent Order, the Respondent shall record all control device operating parameters specified in the Operations and Maintenance Plan.

E. All periods of operations during which the control device operating parameters deviate from the acceptable ranges in the Respondents' approved Operations and Maintenance plan while the processes described in Paragraph A.3 are operating.

F. Control device operating hours, including date and time. Such records shall also distinguish between periods of solvent adsorption and adsorption media regeneration.

G. An up-to-date diagram of the facility indicating the emission units that are directly controlled by "the VOC capture and recovery devices specified in Paragraphs B.2 and B.3.

H. For the purposes of determining actual monthly and annual emissions of VOC from this facility, the monthly quantity of each virgin, VOC-containing raw material and the monthly quantity of each recycled/recovered raw material added to the processes described in Paragraph B.3

I. The Respondent shall make and keep records of LDAR activities in accordance with the LDAR provisions prescribed in Paragraph B.4 of this order.

J. On or before the 15th day of each month, for each of the processes described in Paragraph B.3 of this consent order, the Respondent shall calculate and record the following:

    i. total emissions of VOC discharged during the previous calendar month,

    ii. the total emissions of VOC discharged during the period of twelve-consecutive months ending with the previous month.

The Respondent shall maintain all records required by this consent order for a period of no less than 5 years from the date of recording and shall make such records available to the Commissioner or the US EPA upon request.

8. Emissions testing. The Respondent shall perform stack emissions testing to evaluate the performance of the VOC capture and recovery device(s)required pursuant to Paragraph B.3 of this Consent Order in accordance with Section 22a-174-5 of the RCSA and the following:

a. Within 180 days of the date of issuance of this consent order, the Respondent shall submit an Intent-to-Test (ITT) package consisting of an ITT form (Form AE404) and a test protocol describing the performance of emissions testing to evaluate the performance of the VOC capture and recovery device(s) to ensure compliance with Paragraph B.3. The test protocol shall be consistent with the Bureau's Emission Source Test Guideline specifying the test methodology to be followed and the conditions under which the facility and VOC capture and recovery device(s) will be operated. The protocol shall provide a detailed analysis of the product types and corresponding production rates that result in the maximum hourly VOC emissions from the processes described in Paragraph B.3. Emissions testing shall be performed using products and production rates that correspond to no less than 90% of the maximum hourly VOC emissions from each process. All proposed test methods must comply with appropriate Federal test methods or other methods acceptable to the Commissioner and the US EPA. The ITT package must demonstrate compliance with applicable requirements of the Code of Federal Regulations (CFR) Title 40 Parts 51, 60 and 61. The Bureau and the US EPA must approve any proposed test methods that deviate from those specified in these regulations prior to stack testing. All sampling ports shall be installed and located in compliance with 40 CFR Part 60 Appendix A, Method 1. Final plans showing the location of all sampling ports shall be submitted with the ITT package.

b. The Respondent shall respond to any inquiry or notice of deficiency from the Commissioner or her agent regarding the ITT package within thirty (30) days of the Respondent's receipt of said notice.

c. Not more than ninety (90) days after receiving the approval of the Commissioner or her designee regarding the ITT package, the Respondent shall complete emissions testing in accordance with the approved ITT package. The Respondent shall contact the Bureau of Air Management's Source Monitoring Group to schedule a date and time that would allow the Commissioner or her designee to witness the emissions tests.

d. Not more than sixty (60) days after the completion of the emissions tests, the Respondent shall submit a written report providing the results of the emissions tests.

e. Respondent shall respond to any inquiry or notice of deficiency from the Commissioner or her agent regarding the report within fifteen (15) days of the Respondent's receipt of said notice.

f. Respondent shall repeat emissions testing, such that no less than two programs of emissions testing are performed during each span of five consecutive calendar years from the date of the initial test performed in accordance with this order. The Respondent shall allow, at least, 730 days between the conduct of each program of emissions tests. At least 120 days prior to the anticipated due date of the test, the Respondent shall submit an ITT package that conforms to the requirements of Subparagraph B.5.a. Regarding the performance of repeat emission testing, the Respondent shall act in accordance with Subparagraphs B.5.b-B.5.e of this consent order with respect to the submission of each ITT Package pursuant to this subparagraph.

9. Replacement of the VOC capture and recovery device(s): The Respondent shall notify the Department in writing of plans to replace VOC capture and recovery device(s) not less than 180 days prior to the date planned for the replacement, unless such replacement is due to a catastrophic failure or the control system is destroyed by some act other than negligent operation. The replacement shall not occur unless the Respondent demonstrates, to the Commissioner's satisfaction, that the design of the replacement system should result in emissions reductions that are at least equivalent to the requirements of Paragraphs B.3 of this consent order.

10. Emission Control and/or Monitoring System Malfunctions: In the event of a malfunction of the VOC capture and recovery device(s) or any associated parametric monitoring systems, the Respondent shall comply with the provisions of Section 22a-174-7 of the RCSA.

11. Full Compliance. Respondent shall not be considered in full compliance with this Consent Order until all actions required by this Consent Order have been completed as approved and to the Commissioner's satisfaction.

12. Approvals. Respondent shall use best efforts to submit to the Commissioner all documents required by this Consent Order in a complete and approvable form. If the Commissioner notifies Respondent that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and Respondent shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within 30 days of the Commissioner's notice of deficiencies. In approving any document or other action under this Consent Order, the Commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purposes of this Consent Order. Nothing in this paragraph shall excuse noncompliance or delay.

13. Definitions. As used in this Consent Order, "Commissioner" means the Commissioner or a representative of the Commissioner. The date of "issuance" of this Consent Order is the date the Consent Order is deposited in the U.S. mail or personally delivered, whichever is earlier.

14. 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 deposited in the U.S. mail or is personally delivered, 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 a Connecticut or federal holiday shall be submitted or performed by the next day which is not a Saturday, Sunday or Connecticut or federal holiday.

15. 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 Respondent or, if Respondent is not an individual, by Respondent's chief executive officer or a duly authorized representative of such officer, as those terms are defined in §22a-430-3(b)(2) of the Regulations of Connecticut State Agencies, and by the individual(s) responsible for actually preparing such document, and Respondent or Respondent's chief executive officer and each such individual shall certify in writing as follows:

> "I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information is punishable as a criminal offense

under §53a-157b of the Connecticut General Statutes and any other applicable law."

16. Noncompliance. This Consent Order is a final order of the Commissioner with respect to the matters addressed herein, and is nonappealable and immediately enforceable. Failure to comply with this Consent Order may subject Respondent to an injunction and penalties.

17. False statements. Any false statement in any information submitted pursuant to this Consent Order is punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law.

18. Notice of transfer; liability of Respondent. Until Respondent has fully complied with this Consent Order, Respondent shall notify the Commissioner in writing no later than 15 days after transferring all or any portion of the facility, the operations, the site or the business which is the subject of this Consent Order or after obtaining a new mailing or location address. Respondent's obligations under this Consent Order shall not be affected by the passage of title to any property to any other person or municipality.

19. 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 past, present, or future violations of law. If at any time the Commissioner determines that the actions taken by Respondent pursuant to this Consent Order have not successfully corrected all violations, fully characterized the extent or degree of any pollution, or 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 violations or pollution.

20. Respondent's obligations under law. Nothing in this Consent Order shall relieve Respondent of other obligations under applicable federal, state and local law.

21. 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 abate pollution.

22. Access to facility. Any representative of the Department of Environmental Protection and the Environmental Protection Agency may enter the facility without prior notice for the purposes of monitoring and enforcing the actions required or allowed by this Consent Order.

23. No effect on rights of other persons. This Consent Order neither creates nor affects any rights of persons or municipalities that are not parties to this Consent Order.

24. Notice to Commissioner of changes. Within 15 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.

25. 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 requirement of this Consent Order or of any document required hereunder, Respondent shall immediately notify by telephone the individual identified in the next paragraph 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. Within five (5) days of the initial notice, Respondent shall submit in writing the date, time, and duration of the noncompliance and 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. Any written approval of noncompliance by the Commissioner pursuant to the terms of this order shall operate solely as a matter of state law.

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

Supervisor
Department of Environmental Protection
BUREAU OF AIR MANAGEMENT
Compliance Analysis Coordination Unit
79 Elm Street
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.

CYRO Industries

BY: _____

EDWARD M. OLSEN
(Print Name)

PLANT MANAGER
(Title)

2-5-07
Date

Issued as a final order of the Commissioner of Environmental Protection.

_____ 2/28/07
Gina McCarthy Date
Commissioner

TOWN OF WALLINGFORD LAND RECORD

MAILED CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Certified Document Number: 7005 3110 0001 2315 1468

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OF CONNECTICUT	)	ORDER NO. 8270
	)	
vs.	)	
	)	
CURTIS PACKAGING CORPORATION	)	

CONSENT ORDER

A. With the agreement of Curtis Packaging Corporation ("Respondent"), the Commissioner of Environmental Protection ("Commissioner") finds the following:

1. The Respondent manufactures custom designed paperboard and cardboard packaging at 44 Berkshire Road, Newtown, Connecticut ("facility").

2. At the facility, the Respondent maintains and operates three (3) Sheet-fed Offset Lithographic Printing Presses ("printing presses"), a Varimat Press No. 29, a Rapida Model 130A-7 and a Harris Model LVF-121. The Varimat Press No. 29 was constructed and began operating in March 2004. The Rapida Model 130A-7 press was constructed and began operating in 1999. The Harris Model LVF-121 press was constructed and began operating in 1980.

3. The presses use ultra-violet cured ("UV") inks, fountain solutions and cleaning solvents. The inks, fountain solutions and cleaning solvents contain volatile organic compounds ("VOC").

4. Pursuant to Section 22a-174-32 of the Regulations of the Connecticut Sate Agencies ("Regulations"), subject premises with potential VOC emissions greater than fifty (50) tons per year are subject to the provisions in Section 22a-174-32 of the Regulations.

5. In 2002, the Respondent reported that the facility had actual VOC emissions greater than fifty (50) tons per year since December 31, 1995; therefore the Respondent is subject to the provisions of Section 22a-174-32 of the Regulations.

6. Pursuant to Section 22a-174-32(e) of the Regulations, the Respondent is required to reduce the facility's VOC emissions by implementing one of the Reasonably Available Control Technology methods specified in Sections 22a-174-32(e)(1)-(6) of the Regulations.

7. Pursuant to Section 22a-174-32(e)(6) of the Regulations, the Respondent submitted a VOC RACT Compliance Plan, specifically, an Alternative Compliance Plan ("ACP") on December 17, 2002. On June 28, 2006, the Respondent submitted a supplemental plan for the Commissioner's review and approval.

8. The December 17, 2002 VOC RACT plan and supplemental plan have been reviewed and are hereby approved by the Commissioner with the conditions specified in paragraph B of this Consent Order.

9. According to the Respondent's plans:

   a. In June 2002, the Respondent reformulated by replacing alcohol additives in fountain solutions with non-alcohol additives and conventional oil-based inks with UV cured inks and eliminated high VOC containing cleaning solvents at the facility.

   b. As a result of the above reformulating efforts, the facility's VOC emissions were reduced from 61.2 tons per year to 12.3 tons per year.

   c. The installation of additional control equipment is technically or economically infeasible.

   d. RACT for the facility should reflect the VOC emissions reduction that resulted from reformulating.

B. The Commissioner, acting under Sections 22a-6, 22a-171, 22a-174, 22a-177 and 22a-178 of the Connecticut General Statutes, orders the Respondent as follows:

1. **Fountain Solution and Inks Requirements:** The Respondent shall:

   a. Use only alcohol substitute fountain solution on the printing presses. For purpose of this Consent Order, "alcohol substitute" means any non-alcohol additive that contains VOCs and is used in the fountain solution.

   b. Limit the VOC concentration in the alcohol substitute fountain solution, to 5% or less by weight, as applied.

   c. Use UV cured inks or inks with a VOC content of 1% or less by weight.

2. **Cleaning Solution Requirements:** The Respondent shall:

   a. Transport and store the cleaning solutions in tightly covered containers.

   b. Place cleaning rags used in conjunction with the cleaning solutions in tightly covered containers for collection and proper disposal or recycling.

   c. Use cleaning solution containing no more than 30% VOC, by weight, or having a VOC composite partial pressure of 10 mmHg or less at 20°C (68°F).

3. **Testing and Record Keeping Requirements:** The Respondent shall:

   a. Submit within thirty (30) days of issuance of this Consent Order for the Commissioner's and EPA's review and approval, a plan for testing to determine the VOC content, as applied, of all fountain solutions, currently in use. The test plan shall include the methodology by which the fountain solution is to be tested, a schedule for periodically testing the fountain solutions currently in use, procedures of ensuring continual compliance with the VOC content limits of

paragraph B.1.b of this consent order, and procedures for testing new fountain solution formulations.

b. Conduct fountain solution tests in accordance with the approved test plan referenced in paragraph B.3.a of this Consent Order.

c. In accordance with Section 22a-174-32(g) of the Regulations, the Respondent shall make and keep such records that are necessary to reliably calculate actual monthly and annual solvent usage and VOC emissions at the facility. Records shall be made available to representatives of the Department or EPA upon request. Such records shall be created for each calendar month and 12-month period by keeping the following daily records:

   i. Identity, formulation (as determined by the manufacturer's formulation data), VOC content and quantity for each VOC containing material used, including but not limited to isopropyl alcohol substitutes, fountain solution, inks and cleaning solution(s).

   ii. The percent of VOC by weight in the fountain solution, as applied, whenever a new batch of fountain solution is mixed or additives are added to an existing batch of the fountain solution.

d. Make and keep records of each fountain solution test performed in accordance with paragraph B.3.b of this Consent Order. Such records shall demonstrate compliance with paragraph B.1.b of this Consent Order.

e. Keep each record required by this Consent Order at the premise for five years after the date that such record is made and make these records available to the Commissioner and/or EPA upon request.

4. Full compliance. Respondent shall not be considered in full compliance with this Consent Order until all actions required by this Consent Order have been completed as approved and to the Commissioner's satisfaction.

5. Approvals. Respondent shall use best efforts to submit to the Commissioner all documents required by this Consent Order in a complete and approvable form. If the Commissioner notifies Respondent that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and Respondent shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within 30 days of the Commissioner's notice of deficiencies. In approving any document or other action under this Consent Order, the Commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purposes of this Consent Order. Nothing in this paragraph shall excuse noncompliance or delay.

6. Definitions. As used in this Consent Order, "Commissioner" means the Commissioner or a representative of the Commissioner.

7. Dates. The date of "issuance" of this Consent Order is the date the Consent Order is deposited in the U.S. mail or personally delivered, whichever is earlier. 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 deposited in the U.S. mail or is personally delivered, 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 a Connecticut or federal holiday shall be submitted or performed by the next day which is not a Saturday, Sunday or Connecticut or federal holiday.

8. 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 Respondent or, if Respondent is not an individual, by Respondent's chief executive officer or a duly authorized representative of such officer, as those terms are defined in §22a-430-3(b)(2) of the Regulations of Connecticut State Agencies, and by the individual(s) responsible for actually preparing such document, and Respondent or Respondent's chief executive officer and each such individual shall certify in writing as follows:

   "I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information is punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law."

9. Noncompliance. This Consent Order is a final order of the Commissioner with respect to the matters addressed herein, and is nonappealable and immediately enforceable. Failure to comply with this Consent Order may subject Respondent to an injunction and penalties.

10. False Statements. Any false statement in any information submitted pursuant to this Consent Order is punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law.

11. Notice of transfer; liability of Respondent. Until Respondent has fully complied with this Consent Order, Respondent shall notify the Commissioner in writing no later than 15 days after transferring all or any portion of the facility, the operations, the site or the business which is the subject of this Consent Order or after obtaining a new mailing or location address. Respondent's obligations under this Consent Order shall not be affected by the passage of title to any property to any other person or municipality.

12. Commissioner's powers. Except as provided hereinabove with respect to payment of civil penalties, 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 past, present, or future violations of law. If at any time the Commissioner determines that the actions taken by Respondent pursuant to this Consent Order

have not successfully corrected all violations, fully characterized the extent or degree of any pollution, or 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 violations or pollution.

13. Respondent's obligations under law. Nothing in this Consent Order shall relieve Respondent of other obligations under applicable federal, state and local law.

14. 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.

15. Access to site. 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.

16. No effect on rights of other persons. This Consent Order neither creates nor affects any rights of persons or municipalities that are not parties to this Consent Order.

17. Notice to Commissioner of changes. Within 15 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.

18. 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 requirement of this Consent Order or of any document required hereunder, Respondent shall immediately notify by telephone the individual identified in the next paragraph 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. Within five (5) days of the initial notice, Respondent shall submit in writing the date, time, and duration of the noncompliance and 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.

19. 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:

Mr. Seng Phouthakoun
Department of Environmental Protection
Bureau of Air Management
Compliance and Field Operations Division
79 Elm Street
Hartford, Connecticut 06106-5127

20. Joint and several liability. Respondents shall be jointly and severally liable for compliance with this Consent Order.

Respondent consents to the issuance of this Consent Order without further notice.

Curtis Packaging Corporation

Signature: William F Peck

Type Name: William F Peck

Type Title: Senior Vice President

Date: April 9, 2007

Issued as a final order of the Commissioner of Environmental Protection.

Gina McCarthy
Commissioner

5/1/07
Date

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