



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

79 Elm Street • Hartford, CT 06106-5127

www.ct.gov/deep

Affirmative Action/Equal Opportunity Employer

STATE OF CONNECTICUT) Order No. 8337
VS.)
ILLINOIS TOOL WORKS INC.,)
DBA ITW GRAPHICS)
)

CONSENT ORDER

A. At the request and with the agreement of Illinois Tool Works, Inc. dba ITW Graphics ("Respondent"), the Commissioner of Energy and Environmental Protection ("Commissioner") finds the following:

1. The Respondent is a business located at 375 New State Road in Manchester, Connecticut ("facility") that operates a number of screen printing and silk screen printing presses ("presses") and a ReGensorb concentration/thermal oxidizer system ("ReGensorb") under New Source Review (NSR) permit No. 097-0094 issued on December 22, 2011 by the Commissioner.
2. Permit No. 097-0094, Part I.E.1, directs the Respondent to operate the ReGensorb at all times that the presses are in operation or emitting air pollutants in accordance with Section 22a-174-7(a) of the Regulations of Connecticut State Agencies ("Regulations").
3. Permit No. 097-0094, Part II.C restricts the Respondent to actual volatile organic compounds ("VOC") emissions of not more than 10.21 lbs/hr from all presses in the facility.
4. The Respondent notified staff of the Department of Energy and Environmental Protection ("Department") on June 6, 2013 that the ReGensorb was not working properly and would be replaced by a CMM Rotary Concentrator/Regenerative Thermal Oxidizer System ("RTO").
5. On November 8, 2013, the Respondent petitioned the Department for approval to operate a portion of its printing operation without an air pollution control system for a period of approximately 2 weeks, while the RTO is being installed at the facility.
6. Notwithstanding Paragraph C. of this order and pursuant to Section 22a-174-3a(d) of the Regulations, this Consent Order addresses the operation of the presses without the pollution control system described in Paragraph A.1 of this order.

B. The Commissioner, in accordance with the provisions of this Consent Order, hereby allows the Respondent to operate the facility in compliance with the VOC emission limits of Permit No. 097-0094 through a VOC usage restriction for the presses and associated screen washing equipment.

C. Violations of permit No. 097-0094 and other sections of the Regulations have been identified during inspections and record reviews conducted by representatives of the Commissioner beginning in June 2013. This Consent Order in no way addresses those violations and 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.

D. With the agreement of the Respondent, the Commissioner, acting under Sections 22a-6, 22a-174, 22a-176 and 22a-177 of the Connecticut General Statutes, hereby orders Respondent as follows:

1. Beginning and expiration of this Consent Order: The Respondent may only operate the presses and associated screen washing equipment at the facility in accordance with the terms of this Consent Order from the commencement date specified in Paragraph D.5 of this Consent Order until the date of expiration of this Consent Order. The date of expiration of this Consent Order shall be 21 calendar days from the commencement date specified in subparagraph D.5 of this order.
2. Printing press operating restrictions: While operating under the terms of this Consent Order, the Respondent shall not allow the application of more than 6 pounds of VOC per hour through all presses and associated screen washing operations.
3. Hazardous Air Pollutants: While operating under the terms of this Consent Order, the Respondent shall ensure that the emissions of Hazardous Air Pollutants (HAP), as they are defined in Section 22a-174-1(50) of the Regulations, comply with the limits specified in Section 22a-174-29 of the Regulations and Permit No. 097-0094.
4. Record keeping requirements: The Respondent shall make and retain accurate records to demonstrate that the presses are operated in compliance with the restrictions described in Paragraph D.2 and D.3 of this order. Such records shall include:
 - a) name and quantity of inks delivered daily to each press, their VOC content and HAP content;
 - b) quantity of inks produced daily as waste from each press, their VOC content and HAP content;
 - c) name and quantity of cleaning solvents and diluents used daily by the facility, their VOC and HAP content;
 - d) quantity of cleaning solvents and diluents produced daily as waste by the facility, their VOC and HAP content;

- e) date and hours of operation of the facility for each day the facility is operated pursuant to this Consent Order and total hourly VOC emissions for all presses and associated screen washing equipment;
- f) HAP emission calculations specified in Section 22a-174-29 of the Regulations and Part IV.B. of Permit No. 097-0094.

5. Notification. The Respondent shall submit to the Commissioner notification of their intention to operate the facility without an emission control system including the date when such operation will commence.

6. Approvals. The Respondent shall use best efforts to submit to the Commissioner all documents required by this Order in a complete and approvable form. If the Commissioner notifies the Respondent that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and the 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.

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

8. 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.

9. 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 the Respondent or, if the Respondent is not an individual, by the 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 the Respondent or the 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 Section §53a-157b of the Connecticut General Statutes and any other applicable law."

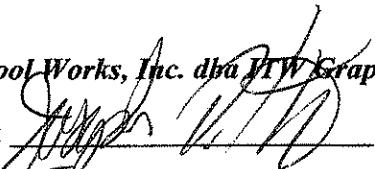
10. Noncompliance. This Consent Order is a final order of the Commissioner with respect to the matters addressed herein, and is nonappealable and immediately enforceable. Failure to comply with this Consent Order may subject the Respondent to an injunction and penalties. Failure to operate within the limits set forth in Paragraph C. of this Consent Order could result in further enforcement action according to the Department of Energy and Environmental Protection's Enforcement Response Policy.
11. False statements. Any false statement in any information submitted pursuant to this consent order may be punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law.
12. Notice of transfer; liability of Respondent. Until the 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. The 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.
13. 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 the Respondent to undertake further investigation or further action to prevent or abate violations or pollution.
14. Respondent's obligations under law. Nothing in this Consent Order shall relieve the Respondent of other obligations under applicable federal, state and local law.
15. 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 the Respondent pursuant to this Consent Order will result in compliance.
16. Access to site. Any representative of the Department of Energy and 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.

17. 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.
18. Notice to Commissioner of changes. Within 15 days of the date the 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, the Respondent shall submit the correct or omitted information to the Commissioner.
19. Notification of noncompliance. In the event that the 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, the 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, the 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 the Respondent shall comply with any dates which may be approved in writing by the Commissioner. Notification by the 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.
20. 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:

Marco Lumbroso
Department of Energy and Environmental Protection
Air Engineering & Enforcement Division
79 Elm Street, 5th Floor
Hartford, Connecticut 06106-5127

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

Illinois Tool Works, Inc. dba ITW Graphics

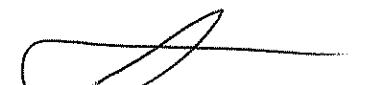
Signature: 

Type Name: JOSEPH TETRAULT

Type Title: SENIOR PROCESS DEVELOPMENT

Date: 12-5-13

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


Macky McCleary
Deputy Commissioner
Department of Energy and Environmental Protection

Date

12/5/13

MAILED CERTIFIED MAIL,
RETURN RECEIPT REQUESTED