



STATE OF CONNECTICUT) Order No. 8339
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 QUALITY NAME PLATE, INC.)
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CONSENT ORDER

A. With the agreement of Quality Name Plate, Inc. ("Respondent"), the Commissioner of Energy and Environmental Protection ("Commissioner") finds the following:

1. Respondent is a business that is located at 22 Fisher Hill Road, East Glastonbury, Connecticut ("facility").
2. At the facility, Respondent owns and operates surface coating operations that apply surface coatings containing volatile organic compounds (VOCs) to miscellaneous metal and plastic parts and products ("coating operations").
3. Respondent is subject to Section 22a-174-20(s) of the Regulations of Connecticut State Agencies (RCSA) because the facility:
 - a. Prior to October 31, 2012, had actual emissions of volatile organic compounds of fifteen (15) pounds or more in any one day from all miscellaneous metal parts and products surface coating operations on such premises *or*
 - b. Purchased for use at the premises, at least, 855 gallons of coatings and cleaning solvents for miscellaneous metal and plastic parts in a rolling 12 month period.
5. On October 31, 2012, Section 22a-174-20(s) of the RCSA was revised to adopt a reasonably available control technology ("RACT") level of control as established in the Environmental Protection Agency's ("EPA's") September 2008 publication of a control techniques guidelines ("CTG") for miscellaneous metal and plastic parts coating operations, effective January 1, 2013.
6. Pursuant to new Section 22a-174-20(s)(3)(A) of the RCSA, the Respondent is limited to 2.8 pounds VOC per gallon of coating. The Respondent's coatings are considered "General multi-component" and are air dried as listed in Table 20(s)-1 of Section 22a-174-20(s) of the RCSA.

7. Pursuant to new subsection 22a-174-20(s)(7)(G) of the RCSA, "An owner or operator with total potential VOC emissions from all miscellaneous metal and plastic parts coating, including emissions from related cleaning, limited by permit or order of the commissioner to 1,666 pounds or less in any given month, shall not be subject to the requirements of subdivision (3) of this subsection, provided that the owner or operator operates in compliance with such permit or order."
8. On March 6, 2014, Respondent requested an order to limit the potential emissions from all metal and plastics parts surface coating operations to 1,666 pounds or less in any calendar month.
9. Respondent demonstrated to the Commissioner's satisfaction that the Respondent's VOC emissions from both the metal and plastics parts coatings did not exceed 1,666 pounds in any calendar month.
10. By virtue of the above, the Respondent's surface coating operations are eligible for the exemption provided in Section 22a-174-20(s)(7)(G) of the RCSA, provided that monthly VOC emissions from all miscellaneous metal and plastic parts surface coating operations do not exceed 1,666 pounds per month.

- B. With the agreement of the Respondent, the Commissioner, pursuant to Sections 22a-6, 22a-171, 22a-174, 22a-177, and 22a-178 of the Connecticut General Statutes, orders as follows:
 1. Respondent shall not cause or allow emissions of VOCs from miscellaneous metal and plastic parts surface coating operations to exceed 1,666 pounds in any calendar month.
 2. No later than thirty days after the end of each month, Respondent shall record and calculate, at least, the following information:
 - a. The name and description of each coating, diluent and cleaning solvent used during the previous month.
 - b. The VOC content of each coating, diluent or cleaning solvent, used during the previous month, as supplied.
 - c. The amount of each coating, cleaning solvent and diluent used for the coating operations, during the previous month.
 - d. The VOC emissions from each coating, solvent, or diluent for each coating unit.
 - e. The total VOC emissions from all metal and plastic surface coating operations.

Such records shall be maintained at the facility for no less than 5 years from the date of generation and shall be made available to the Commissioner immediately upon request.

3. On or before March 1st of each year, Respondent shall submit a report to the Commissioner, stating the total VOC and federal HAP emissions from the surface coating operations emitted during each month in the previous calendar year.
4. So long as Respondent satisfies the provisions of Section 22a-174-20(s)(7)(G) of the RCSA, and of this Consent Order, the metal and plastic coating operations shall be exempt from the emission limitations of Section 22a-174-20(s)(3) of the RCSA.
5. If and when more than 1,666 pounds of VOCs are emitted from the metal and plastic part surface coating operations during any calendar month, the exemption provided by this Consent Order to the provisions of Section 22a-174-20(s)(3) of the RCSA shall, without further notice, terminate. At such time, the Respondent shall immediately and permanently comply with the emission limitations of Section 22a-174-20(s)(3) of the RCSA.
6. 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.
7. 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.
8. Definitions. As used in this Consent Order, "Commissioner" means the Commissioner or a representative of the Commissioner.
9. 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.

10. 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 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 may be punishable as a criminal offense under Section §53a-157b of the Connecticut General Statutes and any other applicable law.”

11. Noncompliance. This consent order is a final order of the Commissioner with respect to the matters addressed herein, and is non-appealable and immediately enforceable. Failure to comply with this Consent Order may subject Respondent to an injunction and penalties.
12. 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.
13. 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.
14. 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 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.

15. Respondent's obligations under law. Nothing in this Consent Order shall relieve Respondent of other obligations under applicable federal, state and local law.
16. 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.
17. 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.
18. 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.
19. 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.
20. 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 Bureau of Air Management Unit 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.
22. 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:

Supervisor, Compliance Analysis and Coordination Unit
Engineering and Enforcement Division
Bureau of Air Management
Department of Environmental Protection
79 Elm Street, 5th Floor
Hartford, Connecticut 06106-5127

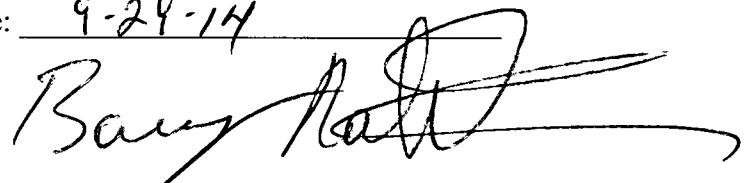
Respondent consents to the issuance of this Consent Order without further notice. The undersigned certifies that he/she is fully authorized to enter into this Consent Order and to legally bind Respondent to the terms and conditions of the Consent Order.

Quality Name Plate, Inc.

Type Name: BARRY RALSTON

Type Title: VICE PRESIDENT

Date: 9-29-14



Issued as an order of the Commissioner of Energy and Environmental Protection.

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

10-06-2014
Date

MAILED CERTIFIED MAIL
GR/am