



**Attachment #1**  
**STATE OF CONNECTICUT**  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION**



STATE OF CONNECTICUT )  
 DEPT. OF ENVIRONMENTAL PROTECTION )  
 VS. )  
 BELDING CORTICELLI THREAD COMPANY )  
 PUTNAM, CONNECTICUT )

JUL 27 1987  
STATE ORDER NO. 8007 SECRETARY OF THE STATE  
 Proposed Order; Oct. 17, 1986  
 Final Order; July 13, 1987

IN THE MATTER OF STATE ORDER NO. 8007

WHEREAS, Belding Corticelli Thread Co., Division of Belding Heminway Company Inc. (hereinafter, the "Company") a Delaware Corporation doing business at 107 Providence Street, Putnam, Connecticut operates manufacturing equipment subject to the standards and limitations of the Administrative Regulations for the Abatement of Air Pollution (hereinafter "Regulations"); and

WHEREAS, the Company operates nine thread coating drying towers which cause emissions of Volatile Organic Compounds (VOC) in excess of one hundred (100) tons per year; and

WHEREAS, Sec. 22a-174-20(ee) of the Regulations requires that any premise with VOC emissions in excess of one hundred (100) tons per year utilize Reasonably Available Control Technology (RACT) to limit the discharge of Volatile Organic Compounds by December 31, 1985 unless an extension is granted pursuant to Section 22a-174-20(ee); and

WHEREAS, the company was issued State Order No. 942 which required that investigation, testing and research be conducted sufficient to permit a RACT determination to be completed and submitted for the thread coating operations; and

WHEREAS, on April 30, 1986, as required by State Order No. 942, the Company submitted a proposal and timetable for the completion of certain modifications which upon implementation will demonstrate Reasonably Available Control Technology for the reduction of VOC emissions from the nine thread coating drying towers; and

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*An Equal Opportunity Employer*

WHEREAS, review of the Company's RACT proposal as well as review of subsequent submissions concerning the feasibility of other abatement options has been conducted by representatives of the Connecticut Department of Environmental Protection's Air Compliance Unit and it has been determined that the Company's proposal represents the lowest emission limitation that is reasonably achievable considering technological and economic feasibility and therefore constitutes Reasonably Available Control Technology; and

WHEREAS, the Company and this Department acknowledge final approval of the RACT proposal as a revision to Connecticut's SIP by the United States Environmental Protection Agency.

NOW, THEREFORE, by authority of Sec. 22a-178, et. seq., of the Connecticut General Statutes and Section 110(a) of the Clean Air Act, as amended, 42 U.S.C. Sec. 7410(a), the Commissioner of the Department of Environmental Protection (hereinafter, "Commissioner") hereby orders the Belding Corticelli Thread Company to take the following action with respect to Volatile Organic Compound emission reductions from its thread coating drying towers. The specific requirements of this order which are deemed necessary for full and complete implementation of the RACT proposal which is approved by this order are further delineated by the Compliance Timetable which is hereby incorporated by reference in this order. The general requirements of this order are as follows:

1. Complete design and installation of a prototype modified combustion unit on one of the nine thread coating drying towers.

2. Complete testing of the prototype unit sufficient to permit additional modifications to the thread coating drying towers to contain emissions in the upper zones of the drying towers and to increase capture of VOC emissions in the lower zones sufficient to achieve an overall VOC capture efficiency of sixty-five percent (65%).

3. Perform additional testing of the prototype unit in accordance with DEP-approved test methods of Section 22a-174-5 of the Regulations to demonstrate destruction efficiency of the modified combustion unit of at least ninety-seven percent (97%).

4. Complete installation of modified combustion units and capture efficiency improvements by December 31, 1987 on all remaining drying towers sufficient to achieve a minimum sixty-five percent (65%) capture efficiency and a ninety-seven percent (97%) destruction efficiency.

5. Complete additional testing in a DEP-approved manner for any parameters of the thread coaters and combustion units in operation beyond December 31, 1987 which may represent a modification from the design and demonstrated operating parameters of the prototype unit.

6. Complete installation of monitors sufficient to confirm compliant operation of the control equipment required by this order.

7. Complete and submit an operations and maintenance plan noting the frequency and type of testing and maintenance to be performed on the control equipment.

8. Compliance with the terms of this order does not excuse the Company from complying with any future source-specific VOC reduction requirements nor does it excuse the Company from complying with the requirements of Section 22a-174-29 of the Regulations concerning Hazardous Air Pollutants.

Failure to complete any step or steps (other than Progress Report requirements) detailed in this order and the accompanying Compliance Timetable by the specified date(s) shall be a violation of an Order of the Commissioner and shall subject the Belding Corticelli Thread Company to liability for civil assessments pursuant to Section 22a-6b(a)(3) of the Connecticut General Statutes and Section 22a-6b-603 of the Department's Regulations. Failure to submit a satisfactory Progress Report by the date(s) set forth in the Compliance Timetable shall subject the Company to liability for civil assessments pursuant to Section 22a-6b(a)(3) of the General Statutes and Section 22a-6b-601 of the Department's Regulations. Departmental action under this authority in no way prevents the Commissioner from seeking, in addition or separately, an injunction enforcing this State Order together with penalties of up to five thousand dollars (\$5,000) per week in court proceedings under Section 22a-180 of the General Statutes.

Belding Corticelli Thread Co.  
Putnam, Connecticut

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Questions concerning the terms of this Order should be addressed to David A. Nash, Enforcement Section, Air Compliance Unit. Any future correspondence should make reference to this State Order.

Entered as a final decision of the Commissioner of Environmental Protection this 15 day of July, 1987, ~~1986.~~

Leslie Carothers  
Leslie Carothers  
Commissioner

As a duly authorized representative of the Belding Corticelli Thread Company, I do hereby consent to the terms and conditions of this order and do hereby waive the right to appeal this order pursuant to Sec. 22a-174-12 (b)(4) of the Regulations this 8 day of August 1987.

Belding Corticelli Thread Co.

By:

Joseph R. Lindley

Title:

President

LC

Enc.