



PROGRESS IN ELECTROFORMING SINCE 1950
February 2009

Environment Committee

Room 3200
Legislative Office Building
Hartford, CT 06106

**Comments referencing Section 1 of Raised Bill No. 871 from George Ray,
President Electroformers Inc., Gar Electroforming, Danbury CT.**

- 1. I strongly urge that the Environment Committee make every effort to REJECT Section 1 of Raised Bill No. 871. Enactment of this legislation will only add to the anti-business image being experienced by the state of Connecticut.**

2. This company has been in existence in Connecticut for over 30 years and has previously at no time been fined or cited for violations causing damage to the environment or any personnel, but recently we experienced an inspection resulting in trivial paperwork violations. Examples being company personnel using initials instead of a full signature on company documents. Is this worth a \$5,000 fine? Another instance is that an employee used terminology "hazardous material vs. hazardous waste" on a label over a drum, again a \$5,000 fine? In the same inspection a used fluorescent light bulb was located in a 55 gallon drum stored in a locked cargo container. We were told it should have been placed in a cardboard box. DEP found it appropriate for another \$5,000 fine. And so it continued for additional citations for paperwork violations amounting to \$48,800, which was appealed by a corporate attorney to \$23,000, however legal fees will exceed the savings of the original fine vs. the amounts settled with the DEP. This sort of action is what excites manufacturers to consider leaving Connecticut and is a deterrent to manufacturers considering locating to Connecticut from other states.

3. On the day of the notice from the DEP concerning the consent order this company received delivery of 2 CNC machines required by one of our largest customers to produce products for on-time delivery. We also were in need of additional employees to perform functions related to our newest machine acquisitions, however we had to withdraw offers to potential employees because of the fines imposed on us due to trivial paperwork violations as previously noted. We could not afford additional wages and pay the DEP imposed fines at the same time. It is unfortunate in this economy that we had to deny employment to several people who may now experience along with thousands of others needless unemployment. What has the state gained by the actions of the DEP seeking fines? More families on the unemployment or welfare roles?

4. Why is it that the DEP personnel will not offer warnings and suggestions to manufacturers as to how to accomplish compliance with DEP rules and regulations? Their function seems to be to seek fines which could be considered acts of extortion, accomplishing no real benefit to the environment, or the economy of the state of Connecticut.
5. In the past, when we asked about fines, we have been unable to secure a schedule of fines as determined by the DEP.
6. When any question or problem has been referred to us by the DEP or EPA this company has expeditiously complied with the orders presented.
7. This Environment Committee may wish to obtain the number of manufacturers who have left the state of Connecticut or have gone out of business as a result of the CT DEP rules and regulations. It can only be surmised that many potential manufacturers outside of Connecticut chose not to relocate to this state because of the strong anti-business climate inspired by CT DEP rules and regulations.
8. Once again, I strongly urge that the Environment Committee make every effort to REJECT Section 1 of Raised Bill No. 871.

I hope you find this presentation enlightening as well as constructive, and I trust this will not lead to retaliation by the DEP against my company.