

Facility DEC ID: 5414400013

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 5-4144-00013/00040
Mod 0 Effective Date: 07/28/2017 Expiration Date: 07/27/2027
Mod 1 Effective Date: 10/04/2021 Expiration Date: No expiration date.
Mod 2 Effective Date: 12/19/2023 Expiration Date: 07/27/2027

Permit Issued To: AMES GOLDSMITH CORP
21 ROGERS ST
GLENS FALLS, NY 12801-3821

Contact: Michael Herman
21 Rogers St
Glens Falls, NY 12801
(518) 741-7860

Facility: AMES GOLDSMITH LLC - 50 HARRISON AVE
50 HARRISON AVE
SOUTH GLENS FALLS, NY 12803

Description:
Harrison Ave is requesting to re-structure the emission units listed in the permit for clarity, to remove the PDR process, associated emission sources and control, and all monitoring requirements for the wet scrubber, and to to install and operate one silver melter equipped with a No. 2 fuel oilfired burner.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: BETH A MAGEE
NYSDEC - WARRENSBURG SUBOFFICE
232 GOLF COURSE RD
WARRENSBURG, NY 12885-1172

Authorized Signature: _____ Date: ___ / ___ / ___

Facility DEC ID: 5414400013

Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

Facility DEC ID: 5414400013

PAGE LOCATION OF CONDITIONS

PAGE

DEC GENERAL CONDITIONS

General Provisions

- 4 1 Facility Inspection by the Department
- 4 2 Relationship of this Permit to Other Department Orders and Determinations
- 4 3 Applications for permit renewals, modifications and transfers
- 5 4 Permit modifications, suspensions or revocations by the Department

Facility Level

- 5 5 Submission of application for permit modification or renewal-REGION 5 SUBOFFICE - WARRENSBURG

Facility DEC ID: 5414400013

DEC GENERAL CONDITIONS
 **** General Provisions ****
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 2-1: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 2-1.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 2-1.2:

The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 2-1.3

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Facility DEC ID: 5414400013

Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal-REGION 5
SUBOFFICE - WARRENSBURG
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 5 Sub-office
Division of Environmental Permits
232 Golf Course Road
Warrensburg, NY 12885-1172
(518) 623-1281

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: AMES GOLDSMITH CORP
21 ROGERS ST
GLENS FALLS, NY 12801-3821

Facility: AMES GOLDSMITH LLC - 50 HARRISON AVE
50 HARRISON AVE
SOUTH GLENS FALLS, NY 12803

Authorized Activity By Standard Industrial Classification Code:
2819 - INDUSTRIAL INORGANIC CHEMICALS

Mod 0 Permit Effective Date: 07/28/2017

Permit Expiration Date: 07/27/2027

Mod 2 Permit Effective Date: 12/19/2023

Permit Expiration Date: 07/27/2027

PAGE LOCATION OF CONDITIONS

PAGE

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 6 1 6 NYCRR 201-6.4 (g): Non Applicable requirements
- 6 11 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

EU=H-AGCU1

- 7 3 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 7 4 6 NYCRR 212-2.4 (b): Compliance Demonstration

EU=U-SILVR,Proc=SIL,ES=SCB01

- 8 2-1 6 NYCRR 212-2.1 (b): Compliance Demonstration
- 9 2-2 6 NYCRR 212-2.1 (b): Compliance Demonstration

EU=U-SILVR,EP=SCB01,Proc=SIL

- 9 2-3 6 NYCRR 212-2.1 (b): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 12 6 ECL 19-0301: Contaminant List
- 12 7 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 13 2-4 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 14 8 6 NYCRR Subpart 201-5: Emission Unit Definition
- 15 9 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 15 10 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 16 2 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

- 16 12 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 18 13 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

FEDERALLY ENFORCEABLE CONDITIONS

Renewal 1/Mod 2/FINAL

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6 NYCRR 200.7

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications,

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

required to operate such device effectively.

Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2

(a) Except as otherwise provided by this Part, construction or operation of a new, modified or existing air contamination source without a registration or permit issued pursuant to this Part is prohibited.

(b) If an existing facility or emission source was subject to the permitting requirements of this Part at the time of construction or modification, and the owner or operator failed to apply for a permit or registration as described in this Part, the owner or operator must apply for a permit or registration in accordance with the provisions of this Part. The facility or emission source is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing emission sources.

Item E: Recycling and Salvage - 6 NYCRR 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item F: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item G: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request.

Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item H: Proof of Eligibility for Sources Defined as Trivial

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

Activities - 6 NYCRR 201-3.3 (a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item I: Required Emission Tests - 6 NYCRR 202-1.1

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item K: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item L: Federally Enforceable Requirements - 40 CFR 70.6 (b)

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Non Applicable requirements
Effective between the dates of 07/28/2017 and 07/27/2027

Applicable Federal Requirement:6 NYCRR 201-6.4 (g)

Item 1.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

6 NYCRR 212-3.1 (c) (4) (i)

Reason: Capture and control requirements are not in effect as long as emissions of volatile organic compounds (VOCs) are less than 50 tons per year.

To demonstrate this, the owner or operator shall calculate emissions of ethanol on a monthly basis and report annually (Not later than January 31st) the total emissions for the previous calendar year. Emissions shall be calculated by subtracting the weight of the dry silver from the weight of wet product before drying.

Condition 11: Visible Emissions Limited
Effective between the dates of 07/28/2017 and 07/27/2027

Applicable Federal Requirement:6 NYCRR 211.2

Item 11.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

****** Emission Unit Level ******

Condition 3: Compliance Demonstration
Effective between the dates of 07/28/2017 and 07/27/2027

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 3.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: H-AGCU1

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4: Compliance Demonstration
Effective between the dates of 07/28/2017 and 07/27/2027

Applicable Federal Requirement:6 NYCRR 212-2.4 (b)

Item 4.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: H-AGCU1

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particles from process sources are

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

limited to less than 0.05 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry basis. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES
 Upper Permit Limit: 0.05 grains per dscf
 Reference Test Method: Method 5
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
 Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
 Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 2-1: Compliance Demonstration
Effective between the dates of 12/19/2023 and 07/27/2027

Applicable Federal Requirement:6 NYCRR 212-2.1 (b)

Item 2-1.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-SILVR
 Process: SIL Emission Source: SCB01

Regulated Contaminant(s):
 CAS No: 007697-37-2 NITRIC ACID

Item 2-1.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The source owner shall maintain a range of pressure drop across the scrubber from this source of 1.75 to 4.75 inches water. The monitoring of this surrogate will assist in demonstrating compliance with nitric acid limit found elsewhere in this permit. Source owner shall operate a monitoring device that continuously measures and records the scrubber pressure drop. Pressure drop will be recorded in a bound log book at the start of each process run and an alarm will sound if the scrubber pump stops operating during processing.

Parameter Monitored: PRESSURE DROP
 Lower Permit Limit: 1.75 inches of water
 Upper Permit Limit: 4.75 inches of water
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
 Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-2: Compliance Demonstration
Effective between the dates of 12/19/2023 and 07/27/2027

Applicable Federal Requirement:6 NYCRR 212-2.1 (b)

Item 2-2.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-SILVR

Process: SIL

Emission Source: SCB01

Regulated Contaminant(s):

CAS No: 007697-37-2 NITRIC ACID

Item 2-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The scrubber liquid shall have a minimum pH of at least 9.0 during processing. Scrubber liquid will be replaced at the beginning of each process run and pH measured at the time of replacement.

Parameter Monitored: ACIDITY/ALKALINITY

Lower Permit Limit: 9 pH (STANDARD) units

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-3: Compliance Demonstration
Effective between the dates of 12/19/2023 and 07/27/2027

Applicable Federal Requirement:6 NYCRR 212-2.1 (b)

Item 2-3.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-SILVR

Process: SIL

Emission Point: SCB01

Regulated Contaminant(s):

CAS No: 007697-37-2 NITRIC ACID

Item 2-3.2:

Compliance Demonstration shall include the following monitoring:

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of nitric acid is given an environmental rating of "B" per 6NYCRR 212.9 table 1. For a B- rated contaminant, having an ERP of <10 pounds per hour, the degree of treatment must be determined by the Commissioner.

To mitigate short-term and annual impacts, the source owner shall not have emissions of nitric acid from emission point SCB01 greater than 0.08 pounds per hour.

Compliance testing may be required at the discretion of the Department.

Parameter Monitored: NITRIC ACID

Upper Permit Limit: 0.08 pounds per hour

Reference Test Method: Method 301

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

STATE ONLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined in 6 NYCRR subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) an emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;

(2) the equipment at the facility was being properly operated and maintained;

(3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) the facility owner or operator notified the department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or malfunction provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

with 6 NYCRR Part 616 - Public Access to Records.
Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item C: **General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5**

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 6: Contaminant List

Effective between the dates of 07/28/2017 and 07/27/2027

Applicable State Requirement:ECL 19-0301

Item 6.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 007697-37-2

Name: NITRIC ACID

Condition 7: Malfunctions and start-up/shutdown activities

Effective between the dates of 07/28/2017 and 07/27/2027

Applicable State Requirement:6 NYCRR 201-1.4

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

Item 7.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 2-4: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 12/19/2023 and 07/27/2027**Applicable State Requirement: 6 NYCRR 201-1.4****Item 2-4.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

reports shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous monitoring and quarterly reporting requirements need not submit additional reports of exceedances to the department.

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, the air contaminants emitted, and the resulting emission rates and/or opacity.

(d) The department may also require the facility owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 8: Emission Unit Definition
Effective between the dates of 07/28/2017 and 07/27/2027

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 8.1(From Mod 2):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: H-AGCU1

Emission Unit Description:

Production of silver flake, production of silver coated coated copper and other miscellaneous operations.

Building(s): 2
 3

Item 8.2(From Mod 2):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-FLAKE

Emission Unit Description:

Silver powder is mixed with chemicals or solvents to disperse the powder before being put into ball mills. The

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

material is transferred into a wash vessel and then to a hand cart for solvent washing and removal by vacuum. The washed silver flake is then dried in a batch oven and sorted by screens.

Item 8.3(From Mod 2):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-SILVR

Emission Unit Description:

Silver ingots are dissolved in nitric acid to produce silver nitrate.

Building(s): 3

Item 8.4(From Mod 2):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-SMELT

Emission Unit Description:

Silver melting pot fired by heating oil.

Item 8.5(From Mod 2):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-STORG

Emission Unit Description:

Storage and sampling of silver-bearing refining materials.

Item 8.6(From Mod 2):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-SVSTL

Emission Unit Description:

Solvent still and solvent storage

Condition 9: Renewal deadlines for state facility permits
Effective between the dates of 07/28/2017 and 07/27/2027

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 9.1:

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 10: Compliance Demonstration
Effective between the dates of 07/28/2017 and 07/27/2027

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 10.1:

The Compliance Demonstration activity will be performed for the Facility.

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
 NYS Dept. of Environmental Conservation
 Region 5
 232 Golf Course Rd.
 Warrensburg, NY 12885

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2: Air pollution prohibited
Effective between the dates of 07/28/2017 and 07/27/2027

Applicable State Requirement:6 NYCRR 211.1

Item 2.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

****** Emission Unit Level ******

Condition 12: Emission Point Definition By Emission Unit
Effective between the dates of 07/28/2017 and 07/27/2027

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 12.1(From Mod 2):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-SILVR

Emission Point: SCB01

Height (ft.): 28	Length (in.): 17	Width (in.): 11
NYTMN (km.): 4794.54	NYTME (km.): 611.45	Building: 3

Item 12.2(From Mod 0):

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: H-AGCU1

Emission Point:	FAN01			
	Height (ft.): 28	Diameter (in.): 24		
	NYTMN (km.): 4794.54	NYTME (km.): 611.4	Building: 3	
Emission Point:	OVACE			
	Height (ft.): 28	Diameter (in.): 6		
	NYTMN (km.): 4794.5	NYTME (km.): 611.42	Building: 3	
Emission Point:	OVN07			
	Height (ft.): 28	Diameter (in.): 6		
	NYTMN (km.): 4794.54	NYTME (km.): 611.46	Building: 3	
Emission Point:	OVN08			
	Height (ft.): 28	Diameter (in.): 6		
	NYTMN (km.): 4794.56	NYTME (km.): 611.45	Building: 3	
Emission Point:	OVN09			
	Height (ft.): 28	Diameter (in.): 6		
	NYTMN (km.): 4794.58	NYTME (km.): 611.44	Building: 3	
Emission Point:	OVN19			
	Height (ft.): 28	Diameter (in.): 6		
	NYTMN (km.): 4794.5	NYTME (km.): 611.43	Building: 3	
Emission Point:	OVN20			
	Height (ft.): 28	Diameter (in.): 6		
	NYTMN (km.): 4794.5	NYTME (km.): 611.42	Building: 3	
Emission Point:	OVN22			
	Height (ft.): 28	Diameter (in.): 6		
	NYTMN (km.): 4794.5	NYTME (km.): 611.42	Building: 3	
Emission Point:	OVN23			
	Height (ft.): 28	Diameter (in.): 6		
	NYTMN (km.): 4794.5	NYTME (km.): 611.42	Building: 3	
Emission Point:	OVNAC			
	Height (ft.): 28	Diameter (in.): 6		
	NYTMN (km.): 4794.5	NYTME (km.): 611.42	Building: 3	
Emission Point:	OVNLR			
	Height (ft.): 28	Diameter (in.): 6		
	NYTMN (km.): 4794.5	NYTME (km.): 611.42	Building: 3	
Emission Point:	SLD01			
	Height (ft.): 28	Diameter (in.): 12		
	NYTMN (km.): 4794.54	NYTME (km.): 611.44	Building: 2	

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

Emission Point: VENT1
Height (ft.): 21 Diameter (in.): 4
NYTMN (km.): 4794.54 NYTME (km.): 611.47 Building: 3

Condition 13: Process Definition By Emission Unit
Effective between the dates of 07/28/2017 and 07/27/2027

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 13.1(From Mod 2):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: H-AGCU1
Process: CPW Source Classification Code: 3-01-999-98
Process Description:
Copper carbonate is reacted with propylene glycol to precipitate copper powder.

Emission Source/Control: RXNC1 - Process

Item 13.2(From Mod 2):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: H-AGCU1
Process: CSR Source Classification Code: 3-01-999-98
Process Description:
Copper flake is reacted with silver nitrate to produce silver coated copper flake.

Emission Source/Control: CWT01 - Process
Design Capacity: 3,000 gallons

Emission Source/Control: CWT02 - Process
Design Capacity: 3,000 gallons

Emission Source/Control: OVNCU - Process

Emission Source/Control: RCT01 - Process
Design Capacity: 1,500 gallons

Emission Source/Control: TNKET - Process
Design Capacity: 300 gallons

Emission Source/Control: WSH01 - Process
Design Capacity: 300 gallons

Item 13.3(From Mod 2):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-FLAKE
Process: FLK Source Classification Code: 3-01-999-98
Process Description:

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

This is a batch process. Silver powder is mixed in with chemicals or solvents to disperse the powder. This material is put into ball mills where it is rolled for 4 to 60 hours depending on the final product. When this process is done, it is pumped into a wash vessel for decant washing and then transferred into a hand cart so the solvents can be washed out and removed by vacuum. The washed silver flake is then dried in a batch oven and sorted by screens. The washed out solvents are sent to either the commodity ethanol stream and sent out for re-use or are distilled in house. A small (SGQ level) portion is sent out as mineral spirits waste.

Particulates from screening are vented to a HEPA dust collector.

Emission Source/Control: FLKCS - Process

Emission Source/Control: FLKWR - Process

Emission Source/Control: FLKWT - Process

Emission Source/Control: MILL1 - Process
Design Capacity: 200 gallons

Emission Source/Control: MILL2 - Process
Design Capacity: 25 gallons

Emission Source/Control: OVNF1 - Process

Emission Source/Control: OVNF2 - Process

Emission Source/Control: OVNF3 - Process

Emission Source/Control: OVNF4 - Process

Emission Source/Control: OVNF5 - Process

Item 13.4(From Mod 2):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-SILVR

Process: SIL

Source Classification Code: 3-01-999-98

Process Description:

Silver ingots are dissolved with nitric acid to make silver nitrate. The acid is treated with hydrogen peroxide and vented through a scrubber.

Emission Source/Control: SCB01 - Control
Control Type: WET SCRUBBER

Emission Source/Control: RXNGR - Process

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013

Emission Source/Control: RXNNI - Process

Emission Source/Control: RXNNP - Process

Emission Source/Control: TNKAG - Process

Emission Source/Control: TNKBW - Process

Item 13.5(From Mod 2):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-SMELT

Process: SML Source Classification Code: 3-01-999-98

Process Description: Silver melting pot fired by heating oil.

Emission Source/Control: SMELT - Process

Item 13.6(From Mod 2):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-STORG

Process: CAT Source Classification Code: 3-01-999-98

Process Description:
Storage and sampling of silver coated spent catalyst.

Emission Source/Control: ONVHT - Process

Item 13.7(From Mod 2):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-SVSTL

Process: H03 Source Classification Code: 3-01-999-98

Process Description: Solvent still and solvent storage.

Emission Source/Control: SVSTL - Process

Emission Source/Control: TNKSV - Process

Design Capacity: 2,000 gallons

Emission Source/Control: TNKSW - Process

Design Capacity: 1,500 gallons

Permit ID: 5-4144-00013/00040

Facility DEC ID: 5414400013