



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1402-01140/00001
Effective Date: 06/08/2018 Expiration Date: 06/07/2028

Permit Issued To: KEYSTONE CORPORATION
2929 MAIN ST
BUFFALO, NY 14214

Contact: Michael Karet
144 Milton St
Buffalo, NY 14210
(716) 435-6330

Facility: KEYSTONE CORPORATION
144 MILTON ST
BUFFALO, NY 14210

Contact: Michael Karet
144 Milton St
Buffalo, NY 14210
(716) 435-6330

Description:

The Keystone facility at 144 Milton Street in Buffalo, NY is a new facility that will have a total of eight metal plating lines (including cadmium, nickel/tin/lead, bright copper (2), silver (2), bright silver and electroless nickel) along with an aluminum preparation line, a pickling, passivation and phosphating line, and a stripping line. Air emissions generated from operation of the plating lines and other process equipment will be exhausted into the atmosphere via one of three stacks/emission points. Wetting agents and mesh pad mist eliminators will both be used as pollutant control measures on the plating tanks/baths. The facility will also have several emission sources that are considered either exempt or trivial according to 6 NYCRR Part 201-3.2 & 3.3 including, but not limited to, combustion installations and manual metal cleaning and surface preparation activities.

Emissions from the facility were calculated by using published emission factors presented in USEPA's AP-42 document, industry trade manuals and from other sources. Based on these calculations, it has been determined that for each contaminant emitted by the facility, the potential to emit is below applicable major source thresholds. In that regard, the Keystone facility is considered a minor source. Several of contaminants that will be emitted by the facility are classified as Hazardous Air Pollutants (HAPs) including cyanide, silver cyanide, potassium cyanide, nickel sulfamate, lead compounds, cadmium compounds, nickel compounds and hydrochloric acid. All of these contaminants are rated as being high in toxicity according to the NYSDEC's DAR-1 Document with the exception of hydrochloric acid (toxicity rating low). Three of the HAPs emitted by the facility, Cadmium Compounds, Nickel Compounds and Lead Compounds, are identified as High Toxicity Air Contaminants (HTAC) according to NYCRR Subpart 212-2.2 Table 2. Nickel Compounds and Cadmium Compounds are also both listed as Persistent, Bioaccumulative and Toxic (PBT) Compounds under 6 NYCRR Part 201-9.1 Table 1. Emissions of these HTAC and PBT contaminants after control technologies were determined



to be well below the applicable emission rate limits. The Department has determined that there is significant uncertainty in deriving electroplating emission factors from AP-42 for metals, as well as control equipment efficiency, such as those used in the application. There are also several residences that closely border the facility.

Due to these factors Keystone Corporation is required to perform emission testing in accordance with 40CFR60, Appendix A, Method 29 to determine the efficiency of control equipment, and concentrations of metals (including: Nickel, Lead, and Cadmium) emitted to the atmosphere from plating processes. This emission testing must occur no later than 180 days after plating activities begin at the facility. The facility must notify the Department in writing the date plating activities begin.

Test protocol(s) shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at least 60 days prior to the proposed test date(s). Department staff will be afforded the opportunity to witness the performance test by notifying the RAPCE of the actual test date at least 30 days prior to the test date. A test report shall be submitted to the RAPCE within 60 days of test completion.

Keystone must submit Air Dispersion Modeling results evaluating contaminant impact on the surrounding community in addition to the emission test report. Parameters used in the Air Dispersion Model should be based on the emission test results.

With respect to contaminants not identified as HTACs, all emissions involving compounds that have a high toxicity rating according to DAR-1 will be controlled using mesh pad mist eliminators and fume suppressants. Control efficiency associated with these units is estimated to be approximately 99%. As none of the high toxicity compounds will be emitted at a rate above one pound per hour, this level of control would be sufficient to meet applicable air cleaning requirements presented in 6 NYCRR Part 212-2.3 Table 4. The facility will also emit several contaminants with a moderate toxicity rating as reported in DAR-1; however all of these contaminants are expected to be emitted at a rate of less than 100 pounds per year. In accordance with Paragraph V.C. of DAR-1 [ASSIGN AN ENVIRONMENTAL RATING (ER)], an environmental rating must be assigned to every criteria and non-criteria air contaminant from process emission sources regulated under Part 212, except Non-HTACs emitted at an annual rate of less than 100 pounds. The non-HTAC moderate toxicity compounds emitted by the facility currently meet this criterion; therefore would be considered compliant with Part 212.

In addition to having to comply with applicable State regulations, the Keystone facility will be regulated under USEPA's 40 CFR 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations). Compliance with this regulation will be achieved through the use of approved control measures and management practices as well as recordkeeping and reporting.

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: MARK F PASSUITE
 NYSDEC - REGION 9
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2915



Authorized Signature: _____ Date: ___ / ___ / _____



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.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



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 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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 3.2:

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

Item 3.3

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.

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 9 HEADQUARTERS

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 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To: KEYSTONE CORPORATION
2929 MAIN ST
BUFFALO, NY 14214

Facility: KEYSTONE CORPORATION
144 MILTON ST
BUFFALO, NY 14210

Authorized Activity By Standard Industrial Classification Code:
3471 - ELECTROPLATING, POLISHING, ANODIZING, AND COLORING

Permit Effective Date: 06/08/2018

Permit Expiration Date: 06/07/2028



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 215.2: Open Fires - Prohibitions
- 2 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 3 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 4 6 NYCRR 211.1: Air pollution prohibited
- 5 6 NYCRR 212-1.7 (a): Compliance Demonstration
- 6 40CFR 63, Subpart A: General Provisions
- 7 40CFR 63.11507(d), Subpart WWWW: Compliance Demonstration
- 8 40CFR 63.11507(g), Subpart WWWW: Compliance Demonstration
- 9 40CFR 63.11508(d)(1), Subpart WWWW: Operation and Maintenance of Air Pollution Equipment
- 10 40CFR 63.11508(d)(8), Subpart WWWW: Compliance Demonstration

Emission Unit Level

EU=0-00001

- 11 40CFR 63.11507(a)(1), Subpart WWWW: Compliance Demonstration
- 12 40CFR 63.11507(b), Subpart WWWW: Compliance Demonstration
- 13 40CFR 63.11508(c)(2), Subpart WWWW: Compliance Demonstration
- 14 40CFR 63.11508(d)(3), Subpart WWWW: Compliance Demonstration
- 15 40CFR 63.11508(d)(4), Subpart WWWW: Compliance Demonstration
- 16 40CFR 63.11508(d)(5), Subpart WWWW: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 17 ECL 19-0301: Contaminant List
- 18 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 19 6 NYCRR Subpart 201-5: Emission Unit Definition
- 20 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 21 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 22 6 NYCRR 211.2: Visible Emissions Limited
- 23 6 NYCRR 217-3.2: Idling of Diesel Trucks Limited

Emission Unit Level

- 24 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 25 6 NYCRR Subpart 201-5: Process Definition By Emission Unit



FEDERALLY ENFORCEABLE CONDITIONS

****** 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, required to operate such device effectively.



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

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

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 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)

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: Open Fires - Prohibitions
Effective between the dates of 06/08/2018 and 06/07/2028

Applicable Federal Requirement: 6 NYCRR 215.2

Item 1.1:

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

Item 1.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit



toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.

(k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.

(l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

Condition 2: Exempt Sources - Proof of Eligibility
Effective between the dates of 06/08/2018 and 06/07/2028

Applicable Federal Requirement:6 NYCRR 201-3.2 (a)

Item 2.1:

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

Condition 3: Trivial Sources - Proof of Eligibility
Effective between the dates of 06/08/2018 and 06/07/2028

Applicable Federal Requirement:6 NYCRR 201-3.3 (a)

Item 3.1:

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

Condition 4: Air pollution prohibited
Effective between the dates of 06/08/2018 and 06/07/2028

Applicable Federal Requirement:6 NYCRR 211.1

Item 4.1:

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.

Condition 5: Compliance Demonstration
Effective between the dates of 06/08/2018 and 06/07/2028



Applicable Federal Requirement: 6 NYCRR 212-1.7 (a)

Item 5.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The Department has determined that there is significant uncertainty in deriving electroplating emission factors from AP-42 for metals other than Chromium, as well as control equipment efficiency, such as those used in the application. There are also several residences that closely border the facility. It is possible that these properties may be adversely impacted due to their proximity to the facility despite low emission levels.

Due to these factors Keystone Corporation is required to perform emission testing in accordance with 40CFR60, Appendix A, Method 29 to determine the efficiency of control equipment, and concentrations of metals (including: Nickel, Lead, and Cadmium) emitted to the atmosphere from plating processes. This emission testing must occur no later than 180 days after plating activities begin at the facility. The facility must notify the Department in writing the date plating activities begin.

Test protocol(s) shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at least 60 days prior to the proposed test date(s). Department staff will be afforded the opportunity to witness the performance test by notifying the RAPCE of the actual test date at least 30 days prior to the test date. A test report shall be submitted to the RAPCE within 60 days of test completion.

Keystone must submit Air Dispersion Modeling results demonstrating contaminant impact on the surrounding community in addition to the emission test report. Parameters used in the Air Dispersion Model should be based on the emission test results. The Air Dispersion Model shall be submitted along with the emission test report.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 6: General Provisions



Effective between the dates of 06/08/2018 and 06/07/2028

Applicable Federal Requirement:40CFR 63, Subpart A

Item 6.1:

This emission source is subject to the applicable provisions of 40 CFR 63 Subpart A. The facility owner is responsible for complying with all applicable technical, administrative and reporting requirements.

Condition 7: Compliance Demonstration

Effective between the dates of 06/08/2018 and 06/07/2028

Applicable Federal Requirement:40CFR 63.11507(d), Subpart

WWWWWW

Item 7.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected new or existing electroplating tank that uses cyanide in the plating bath, operates at pH greater than or equal to 12, and contains one or more of the plating and polishing metal HAP, must measure and record the pH of the tank upon start-up. No additional pH measurements are required. The owner or operator must report in the Notification of Compliance Status the pH of the bath solution that was measured at start-up.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 8: Compliance Demonstration

Effective between the dates of 06/08/2018 and 06/07/2028

Applicable Federal Requirement:40CFR 63.11507(g), Subpart

WWWWWW

Item 8.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected new or existing plating and polishing process unit that contains, applies,



or emits one or more of the plating and polishing metal HAP must implement the applicable management practices in paragraphs (1) through (12), as practicable.

- (1) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
- (2) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.
- (3) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.
- (4) Use tank covers, if already owned and available at the facility, whenever practicable.
- (5) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
- (6) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
- (7) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.
- (8) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.
- (9) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
- (10) Minimize spills and overflow of tanks, as practicable.
- (11) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
- (12) Perform regular inspections to identify leaks and other opportunities for pollution prevention.



Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 9: Operation and Maintenance of Air Pollution Equipment Effective between the dates of 06/08/2018 and 06/07/2028

Applicable Federal Requirement:40CFR 63.11508(d)(1), Subpart WWWWWW

Item 9.1:

The owner or operator must always operate and maintain the affected source, including air pollution control equipment.

Condition 10: Compliance Demonstration Effective between the dates of 06/08/2018 and 06/07/2028

Applicable Federal Requirement:40CFR 63.11508(d)(8), Subpart WWWWWW

Item 10.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected tank or other operation that is subject to the management practices specified in 40CFR 63.11507(g) must demonstrate continuous compliance according to paragraphs (i) and (ii).

(i) The owner or operator must implement the applicable management practices during all times that the affected tank or process is in operation.

(ii) The owner or operator must state in his/her annual compliance certification that he/she has implemented the applicable management practices, as practicable.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2019.

Subsequent reports are due every 12 calendar month(s).

**** Emission Unit Level ****



Condition 11: Compliance Demonstration
Effective between the dates of 06/08/2018 and 06/07/2028

Applicable Federal Requirement:40CFR 63.11507(a)(1), Subpart
WWWWWW

Item 11.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Item 11.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

For an affected new or existing non-cyanide electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and operates at a pH of less than 12, a wetting agent/fume suppressant, as defined in 40CFR 63.11511, must be used in the bath of the affected tank according to paragraphs (i) through (iii).

(i) Initially add the wetting agent/fume suppressant in the amounts recommended by the manufacturer for the specific type of electrolytic process.

(ii) Add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the tank bath, as in the original make-up of the tank.

(iii) If a wetting agent/fume suppressant is included in the electrolytic process bath chemicals used in the affected tank according to the manufacturer's instructions, it is not necessary to add additional wetting agent/fume suppressants to the tank to comply with this rule.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 12: Compliance Demonstration
Effective between the dates of 06/08/2018 and 06/07/2028

Applicable Federal Requirement:40CFR 63.11507(b), Subpart
WWWWWW

Item 12.1:
The Compliance Demonstration activity will be performed for:



Emission Unit: 0-00001

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For an affected new or existing “flash” or short-term electroplating tank, as defined in 40CFR 63.11511, that uses or emits one or more of the plating and polishing metal HAP, the owner or operator must comply with the requirements specified in paragraph (1) or (2), and implement the applicable management practices in 40CFR 63.11507(g), as practicable.

(1) The owner or operator must limit short-term or “flash” electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(2) The owner or operator must use a tank cover, as defined in 40CFR 63.11511, for at least 95 percent of the plating time.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2019.

Subsequent reports are due every 12 calendar month(s).

Condition 13: Compliance Demonstration

Effective between the dates of 06/08/2018 and 06/07/2028

Applicable Federal Requirement:40CFR 63.11508(c)(2), Subpart

WWWWWW

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in 40CFR 63.11507(a) and uses a control system, as defined in 40CFR 63.11511 to comply with 40CFR 63 WWWWWW, must demonstrate initial compliance



according to paragraphs (i) through (v).

(i) The owner or operator must install a control system designed to capture emissions from the affected tank and exhaust them to a composite mesh pad, packed bed scrubber, or mesh pad mist eliminator.

(ii) The owner or operator must state in the Notification of Compliance Status that he/she has installed the control system according to the manufacturer's specifications and instructions.

(iii) The owner or operator must implement the applicable management practices specified in 40CFR 63.11507(g), as practicable.

(iv) The owner or operator must state in the Notification of Compliance Status that he/she has implemented the applicable management practices specified in 40CFR 63.11507(g), as practicable.

(v) The owner or operator must follow the manufacturer's specifications and operating instructions for the control systems at all times.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 14: Compliance Demonstration
Effective between the dates of 06/08/2018 and 06/07/2028

Applicable Federal Requirement:40CFR 63.11508(d)(3), Subpart
WWWWWW

Item 14.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Item 14.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in 40CFR 63.11507(a) and uses a wetting agent/fume suppressant to comply with 40CFR 63 WWWWWW must demonstrate continuous compliance according to paragraphs (i) through (iii).

(i) The owner or operator must record that he/she has added the wetting agent/fume suppressant to the tank bath in the original make-up of the tank.

(ii) For tanks where the wetting agent/fume suppressant is



a separate purchased ingredient from the other tank additives, the owner or operator must demonstrate continuous compliance according to paragraphs (A) and (B).

(A) The owner or operator must add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the tank bath, as in the original make-up of the tank.

(B) The owner or operator must record each addition of wetting agent/fume suppressant to the tank bath.

(iii) The owner or operator must state in his/her annual compliance certification that he/she has added wetting agent/fume suppressant to the bath according to the manufacturer's specifications and instructions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2019.

Subsequent reports are due every 12 calendar month(s).

Condition 15: Compliance Demonstration
Effective between the dates of 06/08/2018 and 06/07/2028

Applicable Federal Requirement:40CFR 63.11508(d)(4), Subpart WWWWWW

Item 15.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Item 15.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The owner or operator of an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in 40CFR 63.11507(a) and uses a control system to comply with 40CFR 63 WWWWWW; an affected dry mechanical polishing operation that is subject to 40CFR 63.11507(e); or an affected thermal spraying operation that is subject to 40CFR 63.11507(f)(1) or (2), must demonstrate continuous compliance according to paragraphs (i) through (v).

(i) The owner or operator must operate and maintain the



control system according to the manufacturer's specifications and instructions.

(ii) Following any malfunction or failure of the capture or control devices to operate properly, the owner or operator must take immediate corrective action to return the equipment to normal operation according to the manufacturer's specifications and operating instructions.

(iii) The owner or operator must state in his/her annual certification that he/she has operated and maintained the control system according to the manufacturer's specifications and instructions.

(iv) The owner or operator must record the results of all control system inspections, deviations from proper operation, and any corrective action taken.

(v) The owner or operator must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2019.

Subsequent reports are due every 12 calendar month(s).

Condition 16: Compliance Demonstration
Effective between the dates of 06/08/2018 and 06/07/2028

Applicable Federal Requirement:40CFR 63.11508(d)(5), Subpart
WWWWWW

Item 16.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Item 16.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in 40CFR 63.11507(b) and complies with 40CFR 63 WWWWWW by limiting the plating time for the affected tank, must demonstrate continuous compliance according to



paragraphs (i) through (iii).

(i) The owner or operator must limit short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(ii) The owner or operator must record the times that the affected tank is operated each day.

(iii) The owner or operator must state in his/her annual compliance certification that he/she has limited short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2019.

Subsequent reports are due every 12 calendar month(s).



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 by 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 be demonstrated 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 permitted facility causing the emergency was at the time being properly operated and maintained;

(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize 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 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 upset 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 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 17: Contaminant List
Effective between the dates of 06/08/2018 and 06/07/2028

Applicable State Requirement:ECL 19-0301

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

No contaminants.

Condition 18: Malfunctions and start-up/shutdown activities
Effective between the dates of 06/08/2018 and 06/07/2028

Applicable State Requirement:6 NYCRR 201-1.4

Item 18.1:

(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 19: Emission Unit Definition
Effective between the dates of 06/08/2018 and 06/07/2028

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 19.1:

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

Emission Unit: 0-00001

Emission Unit Description:

Electroplating

Building(s): 1

Condition 20: Renewal deadlines for state facility permits
Effective between the dates of 06/08/2018 and 06/07/2028

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

Item 20.1:

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 21: Compliance Demonstration
Effective between the dates of 06/08/2018 and 06/07/2028

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

Item 21.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 21.2:
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 9
270 Michigan Ave.
Buffalo, NY 14203

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 22: Visible Emissions Limited
Effective between the dates of 06/08/2018 and 06/07/2028

Applicable State Requirement:6 NYCRR 211.2

Item 22.1:
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.

Condition 23: Idling of Diesel Trucks Limited
Effective between the dates of 06/08/2018 and 06/07/2028

Applicable State Requirement:6 NYCRR 217-3.2

Item 23.1:
No person who owns, operates or leases a bus or truck, the motive power for which is provided by a diesel engine or who owns, leases or occupies land and has the actual or apparent dominion or control over the operation of a bus or truck present on such land, the motive power for which said bus or truck is provided by a diesel engine, shall allow or permit the diesel engine of such bus or truck to idle for more than five consecutive minutes when the bus or truck is not in motion, except as otherwise permitted by 6 NYCRR Subpart 217-3.3.



**** Emission Unit Level ****

Condition 24: Emission Point Definition By Emission Unit
Effective between the dates of 06/08/2018 and 06/07/2028

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 24.1:

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

Emission Unit: 0-00001

Emission Point: 00001

Height (ft.): 17 Diameter (in.): 44
NYTMN (km.): 4753.717 NYTME (km.): 187.169 Building: 1

Emission Point: 00002

Height (ft.): 17 Diameter (in.): 38
NYTMN (km.): 4753.717 NYTME (km.): 187.169 Building: 1

Emission Point: 00003

Height (ft.): 17 Diameter (in.): 26
NYTMN (km.): 4753.717 NYTME (km.): 187.169 Building: 1

Condition 25: Process Definition By Emission Unit
Effective between the dates of 06/08/2018 and 06/07/2028

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 25.1:

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

Emission Unit: 0-00001

Process: K01

Process Description:

This process consists of a Nickel/Tin/Lead Plating Line. The equipment associated with this line includes twelve electroplating tanks (Bright Tin/Lead (4) , Matte Acid Tin, Bright Tin (2), Stannate Tin, Sulfamate Nickel, Bright Nickel, Nickel Strike and Nickel Activator) and two acid dip tanks (Methanesulfonic Acid (1) and Sulfuric Acid (1)). Emissions generated from these tanks are in the form of aerosol mists and include metals, acids and cyanide. The emissions from the nickel activator tank are captured by a hood and routed through a separate exhaust system that features an in-line mesh pad mist eliminator and one accompanying stack (Emission Point #3). Emissions from the other nickel plating tanks are captured by hoods that are equipped with removable mesh pad mist eliminators. The controlled emissions are drawn through a



manifolded exhaust system and discharged through a single common stack (Emission Point #2). Emissions from the other tanks are uncontrolled and are either discharged directly to the atmosphere via a local exhaust ventilation system (Emission Point #1) or are released as fugitive emissions. Note: Emissions from the acid dip tanks are considered to be trivial according to 6 NYCRR Part 201-3.3(c)(47).

Emission Source/Control: EP2ME - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: EP3ME - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: WETAG - Control
Control Type: WETTING AGENT - CHEMICAL FUME
SUPPRESSANT

Emission Source/Control: 0NICK - Process

Emission Source/Control: NICK1 - Process

Emission Source/Control: TINPL - Process

Item 25.2:

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

Emission Unit: 0-00001

Process: K02

Process Description:

This process consists of a Bright Copper Plating Line. The equipment associated with this line includes one electroplating tank (Bright Copper), three acid dip tanks (Hydrochloric Acid), two alkaline electrocleaning tanks (Sodium Hydroxide) and one alkaline soak cleaning tank (Sodium Hydroxide). Emissions generated from these tanks are in the form of aerosol mists and include metals, alkaline ions, acid and cyanide. These emissions are captured by vent hoods located directly above the tanks. The emissions from the electroplating tank are routed through a separate exhaust system that features an in-line mesh pad mist eliminator and one accompanying stack (Emission Point #3). Emissions from the other tanks are uncontrolled and discharged directly to the atmosphere through a single common stack (Emission Point #1). Note: Emissions from the alkaline soak cleaning tank are considered to be trivial according to 6 NYCRR Part 201-3.3(c)(48).

Emission Source/Control: EP3ME - Control
Control Type: MIST ELIMINATOR



Emission Source/Control: ALKL1 - Process

Emission Source/Control: COPP1 - Process

Emission Source/Control: DIPP1 - Process

Item 25.3:

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

Emission Unit: 0-00001

Process: K03

Process Description:

This process consists of a Bright Silver Plating Line. The equipment associated with this line includes four electroplating tanks (Bright Copper, Bright Silver (2) and Silver Strike). Emissions generated from these tanks are in the form of aerosol mists and includes metals, alkaline ions and cyanide. These emissions are captured by vent hoods located directly above the tanks. The emissions are drawn through an exhaust system that features an in-line mesh pad mist eliminator prior to being discharged to the atmosphere through a single stack (Emission Point #3).

Emission Source/Control: EP3ME - Control

Control Type: MIST ELIMINATOR

Emission Source/Control: COPP2 - Process

Emission Source/Control: SILV1 - Process

Item 25.4:

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

Emission Unit: 0-00001

Process: K04

Process Description:

This process consists of an Aluminum Preparation Line. The equipment associated with this line includes one alkaline soak cleaning tank (Pentasodium Triphosphate), one alkaline etch tank (Sodium Hydroxide), four acid dip tanks (Nitric & Sulfuric Acid (1), Nitric Acid (3)) and two zincating (Bondal) tanks. Emissions generated from from these tanks are in the form of aerosol mists and include alkaline ions and acids. These emissions are captured by vent hoods located directly above the tanks and exhausted into the atmosphere through a single common stack (Emission Point #1). Note: Emissions from the acid dip tanks and alkaline cleaning tank are considered to be trivial according to 6 NYCRR Part 201-3.3(c)(47) and 6 NYCRR Part 201-3.3(c)(48), respectively.

Emission Source/Control: ETCH1 - Process



Item 25.5:

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

Emission Unit: 0-00001

Process: K05

Process Description:

This process consists of an Electroless Nickel Plating Line. The equipment associated with this line includes one electroplating tank (Nickel Strike), one electroless plating tank (Nickel) and an acid strip/passivation tank (Nitric Acid). Emissions generated from these tanks are in the form of aerosol mists and include metals, alkaline ions and acids. These emissions are captured by vent hoods located directly above the tanks. Each hood is equipped with a removable mesh pad mist eliminator that is used for controlling emissions. Wetting agents are also used within plating tanks. The emissions from this line are discharged through a single stack (Emission Point #2.

Emission Source/Control: EP2ME - Control

Control Type: MIST ELIMINATOR

Emission Source/Control: WETAG - Control

Control Type: WETTING AGENT - CHEMICAL FUME
SUPPRESSANT

Emission Source/Control: 0NICK - Process

Emission Source/Control: NICK2 - Process

Emission Source/Control: STPAS - Process

Item 25.6:

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

Emission Unit: 0-00001

Process: K06

Process Description:

This process consists of a Cadmium Plating Line. The equipment associated with this line includes one cyanide-cadmium electroplating tank, one nitric acid dip tank, three chromate dip tanks, one chromate conversion coating tank, and one chromic acid bright dip tank. Emissions generated from from these tanks are in the form of aerosol mists and include metal salts, acids and cyanide. These emissions are captured by vent hoods located directly above the tanks. The emissions from the cadmium plating tank are routed through a separate exhaust system that features an in-line mesh pad mist eliminator and one accompanying stack (Emission Point #3). Emissions from the other tanks are controlled independently using wetting agents and/or mesh pad mist eliminators contained within the vent hoods. These emissions are drawn through



a manifolded exhaust system and discharged through a single common stack (Emission Point #2). Note: Emissions from the nitric acid dip tank are considered to be trivial according to 6 NYCRR Part 201-3.3(c)(47).

Emission Source/Control: EP3ME - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: WETAG - Control
Control Type: WETTING AGENT - CHEMICAL FUME SUPPRESSANT

Emission Source/Control: CHAC1 - Process

Emission Source/Control: CHTR1 - Process

Emission Source/Control: CONV1 - Process

Item 25.7:

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

Emission Unit: 0-00001

Process: K07

Process Description:

This process consists of a Cadmium Plating Line. The equipment associated with this line includes one cyanide-cadmium electroplating tank, one nitric acid dip tank, three chromate dip tanks, one chromate conversion coating tank, and one chromic acid bright dip tank. Emissions generated from from these tanks are in the form of aerosol mists and include metal salts, acids and cyanide. These emissions are captured by vent hoods located directly above the tanks. The emissions from the cadmium plating tank are routed through a separate exhaust system that features an in-line mesh pad mist eliminator and one accompanying stack (Emission Point #3). Emissions from the other tanks are controlled independently using wetting agents and/or mesh pad mist eliminators contained within the vent hoods. These emissions are drawn through a manifolded exhaust system and discharged through a single common stack (Emission Point #2). Note: Emissions from the nitric acid dip tank are considered to be trivial according to 6 NYCRR Part 201-3.3(c)(47).

Emission Source/Control: EP3ME - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: COPP3 - Process

Emission Source/Control: OXID1 - Process

Item 25.8:

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



Emission Unit: 0-00001

Process: K08

Process Description:

This process consists of a Silver Plating Line. The equipment associated with this line includes four electroplating tanks (bright silver (2) and silver strike (2)), two acid dip tanks (Hydrochloric Acid), two alkaline electrocleaning tanks (Sodium Hydroxide/Tetrasodium Pyrophosphate), and one alkaline soak cleaning tank (Disodium Metasilicate/Sodium Hydroxide). Emissions generated from from these tanks are in the form of aerosol mists and include metals, alkaline ions, acid and cyanide. The emissions from the electroplating tanks are routed through a separate exhaust system that features an in-line mesh pad mist eliminator and one accompanying stack (Emission Point #3). Emissions from the other tanks are uncontrolled and discharged directly to the atmosphere through a single common stack (Emission Point #1). Note: Emissions from the alkaline soak cleaning tank are considered to be trivial according to 6 NYCRR Part 201-3.3(c)(48).

Emission Source/Control: EP3ME - Control

Control Type: MIST ELIMINATOR

Emission Source/Control: ALKL1 - Process

Emission Source/Control: SILV2 - Process

Item 25.9:

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

Emission Unit: 0-00001

Process: K09

Process Description:

This process consists of a Silver Plating Line. The equipment associated with this line includes four electroplating tanks (bright silver (2) and silver strike (2)), two acid dip tanks (Hydrochloric Acid), two alkaline electrocleaning tanks (Sodium Hydroxide/Tetrasodium Pyrophosphate), and one alkaline soak cleaning tank (Disodium Metasilicate/Sodium Hydroxide). Emissions generated from from these tanks are in the form of aerosol mists and include metals, alkaline ions, acid and cyanide. The emissions from the electroplating tanks are routed through a separate exhaust system that features an in-line mesh pad mist eliminator and one accompanying stack (Emission Point #3). Emissions from the other tanks are uncontrolled and discharged directly to the atmosphere through a single common stack (Emission Point #1). Note: Emissions from the alkaline soak cleaning tank are considered to be trivial according



to 6 NYCRR Part 201-3.3(c)(48).

Emission Source/Control: EP3ME - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: ALKL2 - Process

Emission Source/Control: SILV3 - Process

Item 25.10:

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

Emission Unit: 0-00001

Process: K10

Process Description:

This process consists of a Pickling, Passivation & Phosphating Line. The equipment associated with this line includes one stannate tin electroplating tank, one electroless nickel plating tank (to be added at a later date), one acid passivation/pickling tank (Nitric Acid), one zinc phosphate coating tank, two acid dip tanks (Hydrochloric Acid), one alkaline electrocleaning tank (Sodium Hydroxide/Tetrasodium Pyrophosphate), and one alkaline soak cleaning tank (Disodium Metasilicate/Sodium Hydroxide). Emissions generated from from these tanks are in the form of aerosol mists and include metals, alkaline ions and acids. These emissions are captured by vent hoods located directly above the tanks. All of the emissions from this line, with the exception of those generated from the electroless nickel plating tank, are exhausted directly into the atmosphere through a single common stack (Emission Point #1). Emissions from the electroless nickel tank, when installed, will be routed through a separate exhaust system that includes a mesh pad control device at the intake (Emission Point #2). A wetting agent will also be used within this tank. Note: Emissions from the alkaline soak cleaning tank are considered to be trivial according to 6 NYCRR Part 201-3.3(c)(48).

Emission Source/Control: EP2ME - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: WETAG - Control
Control Type: WETTING AGENT - CHEMICAL FUME
SUPPRESSANT

Emission Source/Control: ALKL3 - Process

Emission Source/Control: NICK0 - Process

Emission Source/Control: PCKL1 - Process



Emission Source/Control: TINP2 - Process

Item 25.11:

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

Emission Unit: 0-00001

Process: K11

Process Description:

This process consists of a Surface Stripping Line. The equipment associated with this line includes one acid strip tank (Sulfuric/Nitric Acid), one organic acid/alkaline strip tank (Sodium Hydroxide), one pretreatment tank containing cyanide solution, one alkaline soak cleaning tank (Disodium Metasilicate/Sodium Hydroxide), and one acid dip tank (Hydrochloric Acid). Emissions from this line include VOCs, acids, alkaline ions and cyanide associated with evaporation of the bath solutions. These emissions are captured by vent hoods located directly above the tanks. The emissions from the cyanide pretreatment tank are routed through a separate exhaust system that features an in-line mesh pad mist eliminator and one accompanying stack (Emission Point #3).

Emissions from the other tanks are uncontrolled and discharged directly to the atmosphere through a single common stack (Emission Point #1). Note: Emissions from the alkaline soak cleaning tank are considered to be trivial according to 6 NYCRR Part 201-3.3(c)(48).

Emission Source/Control: DIPP2 - Process

Emission Source/Control: IMMR1 - Process

Emission Source/Control: STPP1 - Process