

Facility DEC ID: 9142000098

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1420-00098/00002
Effective Date: 03/27/2024 Expiration Date: 03/26/2029

Permit Issued To: Integer Holdings Corporation
5830 Granite Parkway, Suite 1150
Plano, TX 75024

Contact: Brian Brown
11900 Walden Ave
Alden, NY 14004
(716) 937-5290

Facility: Greatbatch Ltd.
11900 WALDEN AVE
ALDEN, NY 14004

Description:

This facility is involved in the research, design, development, and manufacturing of implantable lithium-ion batteries for pacemakers and capacitors for various medical applications. Primary processes involved in manufacturing these products include electrolyte preparation, manual wipe cleaning of parts using solvents, metal substrate coating, anode/cathode production, battery assembly, soldering, welding, quality assurance (QA) testing, and packaging. The facility operates four surface coating machines. The metal substrate coating process consists of automated application of VOC-containing slurries to thin aluminum and copper foil. Emissions from the four surface coating machines are captured in hoods and vented to the atmosphere via roof stacks. The facility installed the fourth coating machine, a drying oven, and an exhaust stack within a building expansion in 2021 referred to as the Lithium-Ion Expansion and anticipates production startup in the first quarter of 2024.

This facility emits high toxicity air contaminants (HTACs) as identified by Table 2 in 6 NYCRR 212-2.2, including nickel, manganese, lead, 2-methoxyethanol, and chloroform. All actual annual HTAC emissions were demonstrated to be below the respective mass emission limits (MELs) established in 6 NYCRR 212-2.2. No further Part 212 analysis was required for HTAC emissions.

The facility emits over 100 pounds per year of each of the following non-HTAC air contaminants; N-Methyl-2-Pyrrolidone (NMP), Tetrahydrofuran (THF), Dimethylformamide (DMF), and styrene. All four of the listed contaminants emitted by the facility are subject to 6 NYCRR 212-2.3(b) - Degree of Air Cleaning Required. All four of the listed contaminants were assigned an Environmental Rating of B and

Facility DEC ID: 9142000098

determined to have an Emission Rate Potential less than 10 pounds per hour, requiring the facility to demonstrate that the maximum annual guidance concentration (AGC) or short-term guidance concentration (SGC) for each pollutant is not exceeded. The facility demonstrated compliance with this part by submitting Aerscreen modeling of the contaminants to New York State Department of Environmental Conservation (NYSDEC) dated August 31, 2022.

This facility operates a Class D coating line, is located outside of New York City and has potential to emit VOCs greater than 10 tons per year, making it subject to the VOC content limits in 6 NYCRR 228-1.4(d) - Surface Coating Processes. The facility uses certain coatings that exceed the VOC content limits established in 6 NYCRR Part 228. A RACT analysis submitted to NYSDEC on August 31, 2023 successfully demonstrated the inability to use coatings with compliant VOC contents due the specific requirements of manufacturing components for medical use and the economic infeasibility of controlling VOC emissions from the coating lines.

Pursuant to the requirements of Section 7(2) of the Climate Leadership and Community Protection Act (CLCPA), NYSDEC has requested and received information regarding the project's consistency with the CLCPA. An analysis of co-pollutants, per Section 7(3), was not required for this permitting action as the facility is located in a community that does not meet the disadvantaged communities (DAC) criteria. A CLCPA analysis was submitted to NYSDEC on August 31, 2023. The CLCPA analysis estimates a decrease in greenhouse gas (GHG) emissions by 2030 and a larger decrease by 2050 due to efficiency improvements and upgrades to heating control systems.

This facility operates emissions sources that are exempt from New York State air permitting requirements. Manually operated laser welding machines are operated in the CAPS Production Area to conduct micro-scale welding of nickel onto tantalum pins and welding titanium lids to cases. These machines are vented to the outdoors. The facility operates other laser welding machines in the Battery Production Area. The emissions from these machines are locally captured by fume extractors. Manually operated laser welding machines are considered a trivial activity per 6 NYCRR 201-3.3(54) - Trivial Activities. The facility operates eight boilers, three dryers, and two water heaters that burn natural gas. These combustion installations are all rated below 10 MMBtu per hour and are therefore, exempt under 6 NYCRR 201-3.2(1) - Exempt Activities. Chromium trioxide is used for etching (cleaning) performed by hand wiping, which is considered a trivial activity per 6 NYCRR 201-3.3(c)(96).

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: LISA M CZECHOWICZ

Facility DEC ID: 9142000098

NYSDEC - REGION 9
700 Delaware Ave
BUFFALO, NY 14209

Authorized Signature: _____ Date: ___ / ___ / _____

Facility DEC ID: 9142000098

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: 9142000098

PAGE LOCATION OF CONDITIONS

PAGE

DEC GENERAL CONDITIONS

General Provisions

- 6 1 Facility Inspection by the Department
- 6 2 Relationship of this Permit to Other Department Orders and Determinations
- 6 3 Applications for permit renewals, modifications and transfers
- 7 4 Permit modifications, suspensions or revocations by the Department

Facility Level

- 7 5 Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

Facility DEC ID: 9142000098

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.

Facility DEC ID: 9142000098

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
700 Delaware Ave.,
Buffalo, NY 14209
(716) 851-7130

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: Integer Holdings Corporation
5830 Granite Parkway, Suite 1150
Plano, TX 75024

Facility: Greatbatch Ltd.
11900 WALDEN AVE
ALDEN, NY 14004

Authorized Activity By Standard Industrial Classification Code:
3692 - PRIMARY BATTERIES, DRY AND WET

Permit Effective Date: 03/27/2024

Permit Expiration Date: 03/26/2029

PAGE LOCATION OF CONDITIONS

PAGE

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

6	1	6 NYCRR 211.2: Visible Emissions Limited
6	2	6 NYCRR 212-2.3 (b): Compliance Demonstration
7	3	6 NYCRR 228-1.3 (a): Compliance Demonstration
8	4	6 NYCRR 228-1.3 (b): Compliance Demonstration
9	5	6 NYCRR 228-1.3 (d): Compliance Demonstration
10	6	6 NYCRR 228-1.5 (e): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

14	7	ECL 19-0301: Contaminant List
15	8	6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
16	9	6 NYCRR Subpart 201-5: Emission Unit Definition
17	10	6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
17	11	6 NYCRR 201-5.3 (c): Compliance Demonstration
18	12	6 NYCRR 211.1: Air pollution prohibited
18	13	6 NYCRR 212-1.6: Compliance Demonstration
19	14	6 NYCRR 212-2.2: Compliance Demonstration
20	15	6 NYCRR 212-2.2: Compliance Demonstration
21	16	6 NYCRR 212-2.2: Compliance Demonstration
22	17	6 NYCRR 212-2.2: Compliance Demonstration
23	18	6 NYCRR 212-2.2: Compliance Demonstration
24	19	6 NYCRR 212-2.2: Compliance Demonstration

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

FEDERALLY ENFORCEABLE CONDITIONS

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: 9-1420-00098/00002

Facility DEC ID: 9142000098

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: 9-1420-00098/00002

Facility DEC ID: 9142000098

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: 9-1420-00098/00002

Facility DEC ID: 9142000098

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: Visible Emissions Limited
Effective between the dates of 03/27/2024 and 03/26/2029

Applicable Federal Requirement:6 NYCRR 211.2

Item 1.1:

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 2: Compliance Demonstration
Effective between the dates of 03/27/2024 and 03/26/2029

Applicable Federal Requirement:6 NYCRR 212-2.3 (b)

Item 2.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants for the environmental rating assigned to the contaminant by the department. A process emission source emitting an air contaminant and having an emission rate potential (ERP) of less than 10 pounds per hour and an Environmental Rating of B or C must meet the annual and short-term guideline concentrations for the air contaminant at the fence line of the facility.

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

The facility emits over 100 lb/yr of each of the following air contaminants; N-Methyl-2-Pyrrolidone (NMP), Tetrahydrofuran (THF), Dimethylformamide (DMF), and Poly methyl methacrylate (PMMA): Styrene (28%). All four of the listed contaminants emitted by the facility are subject to 6 NYCRR 212-2.3(b) – Degree of Air Cleaning Required. All four of the listed contaminants were assigned an Environmental Rating of B and determined to have an Emission Rate Potential less than 10 lb/hr, requiring the facility to demonstrate that the maximum annual guidance concentration (AGC) or short-term guidance concentration (SGC) for each pollutant is not exceeded.

Per 6 NYCRR 212-2.3(b) – Degree of Air Cleaning Required, the offsite air concentration must be below respective AGC and/or SGC for each of the mentioned contaminants. The facility demonstrated compliance with this part by submitting Aerscreen modeling of the contaminants to NYSDEC dated August 31, 2022.

The facility shall maintain purchase records of all products that contain NMP, THF, DMF, or PMMA on site for 5 years from the latest entry and be made available to NYSDEC upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 3: Compliance Demonstration
Effective between the dates of 03/27/2024 and 03/26/2029

Applicable Federal Requirement: 6 NYCRR 228-1.3 (a)

Item 3.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 3.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

This facility is subject to the opacity limitations of 6 NYCRR Part 228-1.3(a) and shall not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any surface coating process emission source or emission point, except only the emission of uncombined water. The New York State Department of Environmental Conservation (NYSDEC) reserves the right to perform or require the performance

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

of an EPA Method 9 opacity evaluation at any time during facility operation.

The facility shall conduct periodic visual observations of all of its emission points, at a minimum of once a month while the processes are in operation. Normal operation of these processes should not result in visible emissions. If visible emissions (other than condensing moisture or steam) are observed, the facility shall investigate and make any necessary corrections in a timely manner. After corrective actions are complete, an additional visual observation of the emission point shall be made the following calendar day to see if visible emissions are still occurring. If visible emissions (other than condensing moisture or steam) are observed for 2 consecutive calendar days, a Method 9 test shall be conducted within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity. The facility shall notify NYSDEC if the Method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up Method 9 tests), investigations and corrective actions will be kept on-site in a bound logbook and include the date, time, observer's name, weather conditions and a description of the observations (steam, visible emissions, etc.). These records shall be kept on site for a period of 5 years from the date of the last entry. Should NYSDEC determine that the record keeping format is inadequate to demonstrate compliance, it shall provide written notice stating the inadequacies, the facility shall have 90 days to revise its prospective record keeping format in a manner acceptable to NYSDEC.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: MONTHLY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4: Compliance Demonstration
Effective between the dates of 03/27/2024 and 03/26/2029

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b)

Item 4.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any emission source subject to 6 NYCRR Part 228-1 must maintain and, upon request, provide the department with a certification from the coating supplier/manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the department and, upon request, these records must be submitted to the department within 90 days of receiving the request. Any additional information required to determine compliance with this Part must be provided to the department in a format acceptable to the department. All records required by this paragraph must be maintained at the facility for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5: Compliance Demonstration
Effective between the dates of 03/27/2024 and 03/26/2029

Applicable Federal Requirement: 6 NYCRR 228-1.3 (d)

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:

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Subpart must:

- (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

- (e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (f) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (g) clean hand held spray guns by one of the following:
 - (1) an enclosed spray gun cleaning system that is kept closed when not in use;
 - (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
 - (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
 - (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 6: Compliance Demonstration
Effective between the dates of 03/27/2024 and 03/26/2029

Applicable Federal Requirement: 6 NYCRR 228-1.5 (e)

Item 6.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
 CAS No: 0NY998-00-0 VOC

Item 6.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

This facility operates a Class D coating line, is located outside of New York City and has potential to emit VOCs greater than 10 tons/year, making it subject to the VOC content limits in 6 NYCRR 228-1.4(d)-Surface Coating Processes. The facility uses coatings that exceed the established VOC content limits. A VOC RACT analysis submitted to the department on August 31, 2023 successfully demonstrated the inability to use coatings with compliant VOC contents due to the specific

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

requirements of manufacturing components for medical use and the economic infeasibility of controlling VOC emissions from the coating lines.

To maintain compliance with 6 NYCRR Part 228-1 VOC RACT requirements, the facility shall limit VOC emissions from non-compliant coatings to 20 tons per year. This limit was derived from the VOC emissions and control cost calculations performed in the VOC RACT analysis. The lowest achievable cost per ton of VOC removed was shown to be \$16,163. This was calculated using the facility's estimated actual VOC emissions from non-compliant coatings, 10 tons per year. The limit of 20 tons per year includes a growth factor to allow for an increase in demand. Based on the VOC RACT analysis, the lowest achievable cost per ton of VOC reduced with an emission rate of 20 tons/year will still be greater than the RACT cost threshold of \$6,241.

The facility shall not use coatings with VOC content greater than 6 lb VOC / lb of coating as applied. To use any coatings with VOC content greater than 6 lb VOC / lb of coating as applied, the facility must submit a reevaluated VOC RACT analysis as part of a significant permit modification application. Use of the coatings with VOC content greater than 6 lb VOC / lb of coating as applied may not commence until issuance of a modified permit.

The facility shall maintain documentation of the reason(s) why compliant coatings were not used and record the total VOC emissions resulting from the use of non-compliant coatings on a 12-month rolling total. These records shall be maintained on site for 5 years from the latest entry. The facility shall submit annual reports to the NYSDEC, postmarked by January 30th for the previous calendar year that includes the following:

- Monthly VOC emissions from non-compliant coatings
- 12 month rolling total VOC emissions from non-compliant coatings.

The RACT analysis shall be reevaluated upon the submittal of an air permit renewal or modification application, or prior to any changes that could significantly impact the existing approved RACT analysis.

Parameter Monitored: VOC

Upper Permit Limit: 20 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2025.
Subsequent reports are due every 12 calendar month(s).

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

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: 9-1420-00098/00002

Facility DEC ID: 9142000098

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 7: Contaminant List

Effective between the dates of 03/27/2024 and 03/26/2029

Applicable State Requirement: ECL 19-0301

Item 7.1:

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

CAS No: 000067-66-3
 Name: CHLOROFORM

CAS No: 000109-86-4
 Name: 2-METHOXYETHANOL

CAS No: 007439-92-1
 Name: LEAD

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

CAS No: 007439-96-5
Name: MANGANESE

CAS No: 0NY059-28-0
Name: NICKEL (NI 059)

CAS No: 0NY998-00-0
Name: VOC

Condition 8: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 03/27/2024 and 03/26/2029

Applicable State Requirement: 6 NYCRR 201-1.4

Item 8.1:

(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 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.

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

Condition 9: Emission Unit Definition
 Effective between the dates of 03/27/2024 and 03/26/2029

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 9.1:

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

Emission Unit: 1-COAT1

Emission Unit Description:

One substrate coating machine operates in each of the following areas; Dry Room/Chem Prep, Ion Wet Space, Gen II Q, and Lithium Ion Expansion

Building(s): MAIN

Item 9.2:

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

Emission Unit: 1-MIX01

Emission Unit Description:

Mixing is performed in the SVO mix Lab Room 205 (milling and mixing Isopar G with SVO powder and water to create a slurry), CFX Mix lab Room 209 (breaking up CFX cakes into powder and mixing with isopropyl alcohol and water followed by drying), and Ink Lab Room 202 (mixing ethanol, terpineol, and ruthenium oxide). A self-contained dust collector equipped with snorkel vents operates in Room 207 to collect particulates from Rooms 202 and 205.

Building(s): MAIN

Item 9.3:

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

Emission Unit: 1-PDMIX

Emission Unit Description:

This emission unit includes venting of the binder oven and planetary disperser mixer in the Lithium Ion Expansion Area where NMP and various powders are used. A self-contained dust collector is used to collect fugitive particulates in prep room including LNMCO (lithium nickel, manganese, cobalt, oxide). The NMP evaporates in the oven, leaving the solids on the substrate.

Building(s): MAIN

Item 9.4:

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

Emission Unit: 1-PREP1

Emission Unit Description:

The CFX Room 208 is used to weigh, prepare, and sinter

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

(heat and moisture) the CFx (carbon monofluoride). The hoods in the Nano Room 204 are for CFx milling that involves using a centrifuge machine to turn larger sized particles into smaller sizes using zirconium balls and vanadium pentoxide sieving, which uses a roto tap vibrating machine to pass particles through four screens. The self-contained dust collector in Room 207 collects fugitive vanadium pentoxide, SVO, and CFx from Rooms 204 and 208. The SVO Room 206 combines silver nitrate and vanadium pentoxide, which is then heated to synthesize SVO. The SVO is placed on a cooling rack under a hood.

Building(s): MAIN

Item 9.5:

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

Emission Unit: 1-PRINT

Emission Unit Description:

Exhaust fan vents the Pad Printing Room 269 where ruthenium ink is used to print serial numbers onto capacitors. Cases and lids are cleaned in a plasma cleaner using compressed oxygen. An electric oven is used to dry the ink on the part.

Building(s): MAIN

Condition 10: Renewal deadlines for state facility permits
Effective between the dates of 03/27/2024 and 03/26/2029

Applicable State Requirement:6 NYCRR 201-5.2 (c)**Item 10.1:**

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 11: Compliance Demonstration
Effective between the dates of 03/27/2024 and 03/26/2029

Applicable State Requirement:6 NYCRR 201-5.3 (c)**Item 11.1:**

The Compliance Demonstration activity will be performed for the Facility.

Item 11.2:

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

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 9
700 Delaware Ave.,
Buffalo, N.Y. 14209

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 12: Air pollution prohibited
Effective between the dates of 03/27/2024 and 03/26/2029

Applicable State Requirement:6 NYCRR 211.1

Item 12.1:

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 13: Compliance Demonstration
Effective between the dates of 03/27/2024 and 03/26/2029

Applicable State Requirement:6 NYCRR 212-1.6

Item 13.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 13.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

This facility is subject to the opacity limitations of 6 NYCRR Part 212-1.6(a) and shall not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except only the emission of uncombined water. The New York State Department of Environmental Conservation (NYSDEC) reserves the right to perform or require the performance of an EPA Method 9 opacity evaluation at any time during facility operation.

The facility shall conduct periodic visual observations of all of its emission points, at a minimum of once a month

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

while the processes are in operation. Normal operation of these processes should not result in visible emissions. If visible emissions (other than condensing moisture or steam) are observed, the facility shall investigate and make any necessary corrections in a timely manner. After corrective actions are complete, an additional visual observation of the emission point shall be made the following calendar day to see if visible emissions are still occurring. If visible emissions (other than condensing moisture or steam) are observed for 2 consecutive calendar days, a Method 9 test shall be conducted within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity. The facility shall notify NYSDEC if the Method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up Method 9 tests), investigations and corrective actions will be kept on-site in a bound logbook and include the date, time, observer's name, weather conditions and a description of the observations (steam, visible emissions, etc.). These records shall be kept on site for a period of 5 years from the date of the last entry. Should NYSDEC determine that the record keeping format is inadequate to demonstrate compliance, it shall provide written notice stating the inadequacies, the facility shall have 90 days to revise its prospective record keeping format in a manner acceptable to NYSDEC.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: MONTHLY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 14: Compliance Demonstration
Effective between the dates of 03/27/2024 and 03/26/2029

Applicable State Requirement: 6 NYCRR 212-2.2

Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY059-28-0 NICKEL (NI 059)

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

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

Monitoring Description:

Nickel and manganese are found in LNMCO (lithium nickel manganese cobalt oxide) used in the Lithium Ion Expansion area. Facility wide nickel emission shall not exceed the MEL of 10 lb/year.

Fugitive emissions of LNMCO will be controlled with a self-contained dust collector with filtration efficiency of 99.97%. Using a projected usage quantity of 2,500 lb/yr of LNMCO; the quantity of nickel (17%) in the product; the filtration efficiency of the collector; and assuming all nickel is emitted; nickel compound emissions are estimated at 0.12 lb/year.

The facility shall maintain purchase and usage records of LNMCO. The facility shall calculate and maintain records of the monthly emissions and 12 month rolling emission total for each specific HTAC. Annual certification, signed by a responsible party, verifying that no mass emission limit in Table 2 was exceeded shall be maintained on site. These records shall be maintained on site for 5 years from the last entry and be made available to NYSDEC upon request.

Parameter Monitored: NICKEL (NI 059)

Upper Permit Limit: 10 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 15: Compliance Demonstration
Effective between the dates of 03/27/2024 and 03/26/2029

Applicable State Requirement:6 NYCRR 212-2.2

Item 15.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007439-96-5 MANGANESE

Item 15.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Nickel and manganese are found in LNMCO (lithium nickel manganese cobalt oxide) used in the Lithium Ion Expansion area. Facility wide manganese emissions shall not exceed

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

the MEL of 10 lb/year.

Fugitive emissions of LMNCO will be controlled with a self-contained dust collector with filtration efficiency of 99.97%. Using a projected usage quantity of 2,500 lb/yr of LNMCO; the quantity of manganese (33%) in the product; the filtration efficiency of the collector; and assuming all manganese is emitted; manganese emissions are estimated at 0.25 lb/year.

The facility shall maintain purchase and usage records of LNMCO. The facility shall calculate and maintain records of the monthly emissions and 12 month rolling emission total for each specific HTAC. Annual certification, signed by a responsible party, verifying that no mass emission limit in Table 2 was exceeded shall be maintained on site. These records shall be maintained on site for 5 years from the last entry and be made available to NYSDEC upon request.

Parameter Monitored: MANGANESE
 Upper Permit Limit: 10 pounds per year
 Monitoring Frequency: MONTHLY
 Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 16: Compliance Demonstration
Effective between the dates of 03/27/2024 and 03/26/2029

Applicable State Requirement: 6 NYCRR 212-2.2

Item 16.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
 CAS No: 000109-86-4 2-METHOXYETHANOL

Item 16.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Hydranal Coulomat AK is used to coat anodes and contains approximately 40% by weight of 2-methoxyethanol. Facility wide emissions shall not exceed the 2-methoxyethanol MEL of 5000 lb/year.

12.5 lb of Hydranal Coulomat AK is used annually, therefore 2-methoxyethanol emissions are below the MEL of 5,000 lb/yr.

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

The facility shall maintain purchase and usage records of Hydranal Coulomat AK. The facility shall calculate and maintain records of the monthly emissions and 12 month rolling emission total for each specific HTAC. Annual certification, signed by a responsible party, verifying that no mass emission limit in Table 2 was exceeded shall be maintained on site. These records shall be maintained on site for 5 years from the last entry and be made available to NYSDEC upon request.

Parameter Monitored: 2-METHOXYETHANOL
 Upper Permit Limit: 5000 pounds per year
 Monitoring Frequency: MONTHLY
 Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2025.
 Subsequent reports are due every 12 calendar month(s).

Condition 17: Compliance Demonstration
Effective between the dates of 03/27/2024 and 03/26/2029

Applicable State Requirement: 6 NYCRR 212-2.2

Item 17.1:
 The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
 CAS No: 000067-66-3 CHLOROFORM

Item 17.2:
 Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:
 Aquastar Coulomat A contains approximately 40% by weight of chloroform and is used to coat anodes, potentially generating fugitive emissions in the Dry Chem Prep Room 104B. Facility wide emissions shall not exceed the chloroform MEL of 100 lb/year.

Approximately 22.5 lb of Aquastar Coulomat A is used annually, resulting in 9 lb of chloroform being used per year. Assuming 100% of chloroform is emitted, emissions are less than the MEL of 100 lb/yr.

The facility shall maintain purchase and usage records of Aquastar Coulomat A. The facility shall calculate and maintain records of the monthly emissions and 12 month rolling emission total for each specific HTAC. Annual certification, signed by a responsible party, verifying

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

that no mass emission limit in Table 2 was exceeded shall be maintained on site. These records shall be maintained on site for 5 years from the last entry and be made available to NYSDEC upon request.

Parameter Monitored: CHLOROFORM
 Upper Permit Limit: 100 pounds per year
 Monitoring Frequency: MONTHLY
 Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 18: Compliance Demonstration
Effective between the dates of 03/27/2024 and 03/26/2029

Applicable State Requirement: 6 NYCRR 212-2.2

Item 18.1:
 The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
 CAS No: 007439-92-1 LEAD

Item 18.2:
 Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:
 37% lead/tin solder wire is used in automated equipment to solder terminal pins to battery cases. Facility wide emissions shall remain below the MEL for lead of 5 lb/yr.

Approximately 89 lb of solder is used annually. Using an emission factor of 4.6 lb of lead emitted per ton of lead solder, the total lead emitted is estimated at 0.076 lb/yr which is within the lead MEL of 5 lb/yr.

The facility shall maintain purchase and usage records of all lead containing materials. The facility shall calculate and maintain records of the monthly emissions and 12 month rolling emission total for each specific HTAC. Annual certification, signed by a responsible party, verifying that no mass emission limit in Table 2 was exceeded shall be maintained on site. These records shall be maintained on site for 5 years from the last entry and be made available to NYSDEC upon request.

Parameter Monitored: LEAD
 Upper Permit Limit: 5 pounds per year
 Monitoring Frequency: MONTHLY
 Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 19: Compliance Demonstration
Effective between the dates of 03/27/2024 and 03/26/2029

Applicable State Requirement: 6 NYCRR 212-2.2

Item 19.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

For an air contaminant listed in 6 NYCRR 212-2.2 Table 2 – high toxicity air contaminant list, the facility owner or operator shall limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit listed for an individual high toxicity air contaminant (HTAC). If the limit is exceeded the facility owner or operator must demonstrate compliance with the air cleaning requirements for the HTAC(s) as specified in subdivision 212-2.3(b), table 4 – degree of air cleaning required for non-criteria air contaminants.

This facility uses products that contain HTACs. All HTAC emissions have been demonstrated to be less than the maximum emission limit (MEL) provided by 6 NYCRR 212-2.2 Table 2.

The facility shall maintain purchase and usage records of all high toxicity air contaminants containing materials. The facility shall calculate and maintain records of the monthly emissions and 12 month rolling emission total for each specific HTAC. Annual certification, signed by a responsible party, verifying that no mass emission limit in Table 2 was exceeded shall be maintained on site. These records shall be maintained on site for 5 years from the last entry and be made available to NYSDEC upon request.

Monitoring Frequency: MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Permit ID: 9-1420-00098/00002

Facility DEC ID: 9142000098