

Facility DEC ID: 9145200112

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1452-00112/00014
Effective Date: 03/23/2022 Expiration Date: 03/22/2032

Permit Issued To: MANITOBA CORP
122-130 CENTRAL AVE
PO BOX 385
LANCASTER, NY 14086-0385

Contact: MANITOBA CORP
122-130 CENTRAL AVE
PO BOX 385
LANCASTER, NY 14086-0385
(716) 685-7000

Facility: MANITOBA CORPORATION
122-130 CENTRAL AVE
LANCASTER, NY 14086

Contact: RICHARD SHINE
122-130 Central Ave
Lancaster, NY 14086
(716) 658-7000

Description:
Manitoba Corporation is a secondary non-ferrous metals reclaimer that consists of a single mechanical non-ferrous wire chopping and separation line and two natural gas fired wire reclaim ovens. The wire chopping and separation line is used to remove the plastic insulation coatings from the wire substrate. The wire chopping and separation line is equipped with a dust collector to capture particulate emissions from the process and is exhausted to EP-00005. The two wire reclaim ovens are used to burn off paper/cardboard insulation from copper wire coils to allow for the recovery/recycling of the copper. The resulting combustion products are routed into a secondary natural gas fired afterburner that completes combustion. EP-00001 and EP-00003 are the two emission points for the two wire reclaim ovens and their associated afterburners. No plastics or PCB containing oils are charged into the ovens.

Since this application is for a new Air State Facility permit, the facility must be evaluated in accordance with the Climate Leadership and Community Protection Act (CLCPA). A CLCPA analysis must consider whether Greenhouse Gas (GHG) emissions are inconsistent with, or will interfere with, the attainment of the statewide GHG emission limits in Article 75 of the Environmental Conservation Law (ECL). These limits require a statewide reduction in GHG emissions from 1990 levels of 40% by 2030 and 85% by 2050. Manitoba Corp. is not adding any new equipment or processes and this Air State Facility permit will replace the facility's existing Air

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Facility Registration Certificate. According to the facility's GHG emissions calculations, the potential to emit GHG emissions will remain mostly unchanged with an potential overall decrease in GHG emissions of 717 tons per year by the year 2050. This is based on a potential decrease in the facility's total annual usage of natural gas due to small efficiency upgrades on the current process equipment. This CLCPA analysis is consistent with the statewide requirement to reduce GHG emissions.

Manitoba Corp does not accept municipal solid waste at its facility, therefore is not a private solid waste incineration facility subject to 6 NYCRR Part 219-2 – Municipal and Private Solid Waste Incineration Facilities. Under 6 NYCRR Part 219-1.1(b)(12) a private solid waste incineration facility is defined as any facility, other than a municipal solid waste facility, that processes municipal solid waste, or any fuels derived from municipal solid waste using thermal destruction technologies, with or without energy recovery.

To ensure complete combustion of materials and no additional HAP emissions Manitoba Corp is required to inspect wire coils being loaded into its wire reclaim oven for plastics, not accept transformer coils that have been exposed to PCB contaminated oil and monitor the afterburner temperature of the 2 afterburners. Under 6 NYCRR Part 212-1.7(b) the afterburners shall be maintained at a minimum temperature of 1700 Deg. F and monitored and recorded continuously while in operation.

The wire reclaim ovens and the wire chopping and separation line are subject to 6 NYCRR Part 212 – Process Operations for particulate matter and must follow the regulation regarding visible opacity and particulate emissions. The facility will be required to check for visible emissions from all of its emission points to ensure it does not exceed the 20% opacity limit. It will also be required to monitor parameters, such as production rate, material throughput and visible emissions, to ensure compliance with the 0.050 grains per dry standard cubic foot particulate emission limit.

Non-particulate air contaminant emissions from the wire reclaim ovens are also subject to, and in compliance with, 6 NYCRR Part 212. Emissions of Carbon Monoxide are controlled via the afterburners, in compliance with 6 NYCRR Part 212-2.3(a) – Degree of air cleaning required for criteria contaminants. Emissions of Oxides of Nitrogen meet the National Ambient Air Quality Standards, also in compliance with 6 NYCRR Part 212-2.3(a). Emissions of non-HTACs were less than 100 lbs/yr and emissions of HTACs were less than the limits in 6 NYCRR Part 212-2.2 Table 2 – high toxicity air contaminant list.

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
NYSDEC - REGION 9
270 MICHIGAN AVE

Facility DEC ID: 9145200112

BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: ___ / ___ / _____

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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.

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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.

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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

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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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Permit Issued To: MANITOBA CORP
122-130 CENTRAL AVE
PO BOX 385
LANCASTER, NY 14086-0385

Facility: MANITOBA CORPORATION
122-130 CENTRAL AVE
LANCASTER, NY 14086

Authorized Activity By Standard Industrial Classification Code:
5093 - SCRAP AND WASTE MATERIALS

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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,

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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

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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)

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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 03/23/2022 and 03/22/2032

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 03/23/2022 and 03/22/2032

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

Item 2.1:

The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

- | | |
|---------------------------|-----------------------|
| Emission Unit: U-CHOP1 | Emission Point: 00005 |
| Emission Unit: U-WIRE1 | Emission Point: 00001 |
| Emission Unit: U-WIRE1 | Emission Point: 00003 |
| Regulated Contaminant(s): | |
| CAS No: 0NY075-00-5 | PM-10 |

Item 2.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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No person shall 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 (NYS DEC) reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Manitoba Corp will conduct periodic visual observations of the two natural gas fired wire reclaim oven emission points and the non-ferrous wire chopping and separation line emission point, at a minimum of once a week 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, Manitoba Corp. 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 assessment shall be conducted within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity. Manitoba Corp shall notify the NYS DEC 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 NYS DEC determine that the record keeping format is inadequate to demonstrate compliance, it shall provide written notice stating the inadequacies, and Manitoba Corp shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department. A summary of these records shall be submitted annually.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: METHOD 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

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in a manner consistent with safe, good air pollution control practices, good engineering practices and manufacturers’ recommendations for minimizing emissions.

Temperature records and records of malfunctions and corrective actions shall be maintained on site for a period of 5 years and a summary shall be included in the annual report. Should the New York State Department of Environmental Conservation (NYS DEC) determine that the record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice stating the inadequacies, and Manitoba Corp shall have 90 days to revise its prospective record keeping format in a manner acceptable to the NYS DEC.

Parameter Monitored: TEMPERATURE
 Lower Permit Limit: 1700 degrees Fahrenheit
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
 Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2023.
 Subsequent reports are due every 12 calendar month(s).

Condition 4: Compliance Demonstration
Effective between the dates of 03/23/2022 and 03/22/2032

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

Item 4.1:
 The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

Emission Unit: U-CHOP1
 Process: CHP

Emission Unit: U-WIRE1
 Process: OVN

Regulated Contaminant(s):
 CAS No: 0NY075-00-5 PM-10

Item 4.2:
 Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:
 Emissions of solid particulates are limited to less than

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0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The New York State Department of Environmental Conservation (NYS DEC) reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

Manitoba Corp shall conduct compliance verifications annually for the two natural gas fired wire reclaim ovens and the non-ferrous wire chopping and separation line. These verifications shall include review of pertinent process information including, but not limited to, production rates, process material, air flow rate, control equipment parameters, visible emissions, etc. Manitoba Corp shall confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

Additionally, Manitoba Corp will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site and a summary will be included in the annual report. Should the NYS DEC determine that the record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice stating the inadequacies, and Manitoba Corp shall have 90 days to revise its prospective record keeping format in a manner acceptable to the NYS DEC.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: METHOD 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

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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

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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 5: Contaminant List

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Applicable State Requirement:ECL 19-0301

Item 5.1:

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

CAS No: 0NY075-00-5

Name: PM-10

Condition 6: Malfunctions and Start-up/Shutdown Activities

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Applicable State Requirement:6 NYCRR 201-1.4

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Item 6.1:

(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.

Condition 7: Emission Unit Definition**Effective between the dates of 03/23/2022 and 03/22/2032****Applicable State Requirement:6 NYCRR Subpart 201-5****Item 7.1:**

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

Emission Unit: U-CHOP1

Emission Unit Description:

This emission unit consists of one (1) emission point associated with the wire chopping line dust collector. The dust collector captures particulates generated from the

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mechanical separation of wire insulation from metal wire.

Building(s): 2

Item 7.2:

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

Emission Unit: U-WIRE1

Emission Unit Description:

Two identical natural gas fired ovens are employed to burn paper and cardboard insulation from copper wire transformer coils. The coils were soaked in dielectric mineral oil and the insulation retains some residual mineral oil. The ovens are equipped with primary burners rated at 650,000 BTU/hr and are operated at a temperature of approximately 1,600 deg. F. Untreated wood pallets are placed at the bottom of the oven to assist with the initial combustion cycle. The exhaust gases from the ovens are routed through an afterburner to complete combustion and it employs a natural gas fired burner rated at 1,400,000 BTU/hr. The afterburner chamber is maintained at a temperature of between 1,700 and 1,850 deg. F. The paper/cardboard insulation and mineral oils contain no halogenated compounds and are oxidized to CO₂, water, and ash. It is assumed that a de minimus amount of CO, SO₂ and VOCs are liberated as incomplete combustion products based on the AP-42 emission factors utilized for non-municipal, single chamber refuse combustion chambers, although sulfur containing materials are not expected to be present in the process. Transformer coils exposed to PCB contaminated oils are not accepted at the facility.

Building(s): 1

Condition 8: Renewal deadlines for state facility permits
Effective between the dates of 03/23/2022 and 03/22/2032

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

Item 8.1:

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 9: Compliance Demonstration
Effective between the dates of 03/23/2022 and 03/22/2032

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

Item 9.1:

The Compliance Demonstration activity will be performed for the Facility.

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Item 9.2:

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

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

Condition 10: Air pollution prohibited
Effective between the dates of 03/23/2022 and 03/22/2032

Applicable State Requirement:6 NYCRR 211.1

Item 10.1:

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 11: Compliance Demonstration
Effective between the dates of 03/23/2022 and 03/22/2032

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

Item 11.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-WIRE1

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Manitoba Corp shall inspect all wire coils being loaded

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into the wire reclaim ovens to ensure no plastics are combusted resulting in additional Hazardous Air Pollutants (HAPs) or additional High Toxicity Air Contaminant (HTACs) emissions.

Manitoba Corp shall also not load any wire coils that have been exposed to Polychlorinated Biphenyl (PCB) contaminated oil into the wire reclaim ovens to prevent HAP or HTAC emissions. Manitoba Corp does not accept transformer coils that have been exposed to PCB contaminated oil at its Lancaster facility.

Records of these verifications and inspections will be kept on-site and a summary or certification will be included in the annual report. Should the NYS DEC determine that the record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice stating the inadequacies, and Manitoba Corp shall have 90 days to revise its prospective record keeping format in a manner acceptable to the NYS DEC

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 1/30/2023.

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

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

**Condition 12: Emission Point Definition By Emission Unit
Effective between the dates of 03/23/2022 and 03/22/2032**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 12.1:

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

Emission Unit: U-CHOP1

Emission Point: 00005

Height (ft.): 10

Diameter (in.): 18

NYTMN (km.): 4756.836 NYTME (km.): 200.236 Building: 2

Item 12.2:

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

Emission Unit: U-WIRE1

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Emission Point: 00001
 Height (ft.): 54 Diameter (in.): 18
 NYTMN (km.): 4756.836 NYTME (km.): 200.236 Building: 1

Emission Point: 00003
 Height (ft.): 65 Diameter (in.): 24
 NYTMN (km.): 4756.836 NYTME (km.): 200.236 Building: 1

Condition 13: Process Definition By Emission Unit
Effective between the dates of 03/23/2022 and 03/22/2032

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 13.1:

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

Emission Unit: U-CHOP1
 Process: CHP Source Classification Code: 3-04-002-30

Process Description:

This process encompasses a mechanical non-ferrous wire chopping and separation line that is used to remove the plastic insulation coatings from the wire substrate. The wire goes through a 2 stage granulation process with screens to initially separate the insulation from the copper. After granulation the material goes through an Airdeck separator to remove the final pieces of insulation from the copper, based on density.

Emission Source/Control: DC001 - Control
 Control Type: FABRIC FILTER

Emission Source/Control: CHOP1 - Process
 Design Capacity: 2,500 pounds per hour

Item 13.2:

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

Emission Unit: U-WIRE1
 Process: OVN Source Classification Code: 3-04-002-30

Process Description:

This process encompasses the two natural gas fired wire reclaim ovens used to burn off paper/cardboard insulation from copper wire coils to allow for the recovery/recycling of the copper. The ovens are nominally operated at 1650 deg F where all insulation and mineral oil residuals are oxidized. The normal combustion range for dielectric mineral oils is between 350 and 400 deg F. The resulting combustion products are routed into a secondary natural gas fired afterburner that completes combustion in a temperature range of 1700 to 1850 deg F. Bottom ash in the primary chamber is collected in water trays. No plastics or PCB containing oils are charged into the

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ovens.

Emission Source/Control: ABUR1 - Control
Control Type: DIRECT FLAME AFTERBURNER

Emission Source/Control: ABUR2 - Control
Control Type: DIRECT FLAME AFTERBURNER

Emission Source/Control: OVEN1 - Process
Design Capacity: 5,000 pounds per load

Emission Source/Control: OVEN2 - Process
Design Capacity: 5,000 pounds per load

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