

**New York State Department of Environmental Conservation  
Facility DEC ID: 4382800024**



**PERMIT  
Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 4-3828-00024/00028  
Effective Date: 02/26/1998                      Expiration Date: No expiration date

Permit Issued To: OAK-MITSUI INC  
80 FIRST ST  
HOOSICK FALLS, NY 12090

Contact: OAK-MITSUI INC  
80 FIRST ST  
HOOSICK FALLS, NY 12090

Facility: OAK MITSUI-FIRST ST  
80 FIRST ST  
HOOSICK FALLS, NY 12090

Contact: OAK-MITSUI INC  
80 FIRST ST  
HOOSICK FALLS, NY 12090

**Description:**

- 1.) The emissions of sulfur dioxide (SO<sub>2</sub>) from this facility during any 12 consecutive months shall be less than 100 tons. SO<sub>2</sub> emissions for this source shall be calculated using an emission factor of 225 pounds per 1000 gallons of #4 fuel oil burned.
- 2.) This facility shall limit their total use of #4 fuel oil to less than 888,000 gallons during any twelve consecutive months without modifying permit conditions. Monthly fuel usage records must be kept on site for the most recent five year period.
- 3.) An annual tune-up (adjustments made to the combustion process to optimize efficiency of the unit) shall be performed for each boiler at the facility.
- 4.) The source is subject to and shall meet requirements of 6 NYCRR Subpart 225-1 and Part 227.
- 5.) Annually, the facility shall provide written certification to the department by February 15th of the following year that it has operated in compliance with special conditions #1 and #2. This certification shall include monthly fuel usage and emissions summary.
- 6.) Any noncompliance with the rolling 12 month SO<sub>2</sub> emission limit in special condition #1 or the fuel limit in special condition #2, shall be reported to the department within 30 days of the occurrence.
- 7.) Any noncompliance with the rolling 12 month SO<sub>2</sub> emission limit in special condition #1 or the fuel



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limit in special condition #2, shall be grounds for the department to revoke all permits for this facility.

8.) Representatives of the department shall be permitted, during reasonable business hours, entrance to the facility to perform inspections, review emission records and fuel use, and obtain samples to confirm compliance with the above the above operating conditions.

9.) Any reports, notifications, and/or certifications required to be provided to the department in special conditions #1-5 shall be made available to the Region 4 Regional Pollution Control Engineer at 1150 North Westcott Road, Schenectady, NY 12306-2014.

10.) These emission limits allow the facility the opportunity to cap out of Title V and NOx RACT.

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:           NANCY M ADAMS  
  1130 N WESTCOTT RD  
  SCHENECTADY, NY 12306-2014

Authorized Signature: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_



**Notification of Other State Permittee Obligations**

**Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification**

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

**Item B: Permittee's Contractors to Comply with Permit**

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

**Item C: Permittee Responsible for Obtaining Other Required Permits**

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Permit Modifications, Suspensions, and Revocations by the Department

**Facility Level**

Submission of Applications for Permit Modification or Renewal -REGION 4  
HEADQUARTERS

Submission of application for permit modification or renewal-REGION 4  
HEADQUARTERS



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

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

**Item 1.1:**

sonable 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: Permit Modifications, Suspensions, and Revocations by the Department**  
**Applicable State Requirement: 6NYCRR 621.14**

**Item 3.1:**

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.



**\*\*\*\* Facility Level \*\*\*\***

**Condition 4: Submission of Applications for Permit Modification or Renewal -REGION 4 HEADQUARTERS**  
**Applicable State Requirement: 6NYCRR 621.5(a)**

**Item 4.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 4 Headquarters  
Division of Environmental Permits  
1150 North Westcott Rd.  
Schenectady, NY 12306-2014  
(518) 357-2069

**Condition 5: Submission of application for permit modification or renewal-REGION 4 HEADQUARTERS**  
**Applicable State Requirement: 6NYCRR 621.6(a)**

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 4 Headquarters  
Division of Environmental Permits  
1130 North Westcott Rd.  
Schenectady, NY 12306-2014  
(518) 357-2069



**New York State Department of Environmental Conservation**

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**Facility DEC ID: 4382800024**

**Permit Under the Environmental Conservation Law (ECL)**

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

**IDENTIFICATION INFORMATION**

Permit Issued To: OAK-MITSUI INC  
80 FIRST ST  
HOOSICK FALLS, NY 12090

Facility: OAK MITSUI-FIRST ST  
80 FIRST ST  
HOOSICK FALLS, NY 12090

Authorized Activity By Standard Industrial Classification Code:  
3497 - METAL FOIL AND LEAF

Permit Effective Date: 02/26/1998

Permit Expiration Date: No expiration date.



**LIST OF CONDITIONS**

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1 ECL 19-0301: Contaminant List
- 2 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 3 6NYCRR 201-5: Emission Unit Definition
- 6 6NYCRR 211.2: Air pollution prohibited

**Emission Unit Level**

- 4 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 5 6NYCRR 201-5: Process Definition By Emission Unit

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**STATE ONLY ENFORCEABLE CONDITIONS**

**\*\*\*\* Facility Level \*\*\*\***

**Condition 1: Contaminant List**  
**Effective between the dates of 02/26/1998 and Permit Expiration Date**

**Applicable State Requirement: ECL 19-0301**

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

No contaminants.

**Condition 2: Unavoidable noncompliance and violations**  
**Effective between the dates of 02/26/1998 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-1.4**

Item 2.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case

unavoidable and shall

include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative

and an estimate

of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent

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than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

**Condition 3: Emission Unit Definition**  
**Effective between the dates of 02/26/1998 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 3.1:**

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

Emission Unit: U-BOILS

Emission Unit Description:

This unit consists of a Babcock & Wilcox boiler (BOIL1) and Cleaver Brooks boiler (BOIL2). Both boilers fire # 4 fuel oil only.

Building(s): MAIN

**Item 3.2:**

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

Emission Unit: U-DISLV

Emission Unit Description:

The unit consists of dissolving towers 3 and 4 and associated tanks. Copper wire is dissolved in the sulfuric acid for use in the plating operation. Emissions from the dissolving towers and tanks are treated in a packed tower wet scrubber (SCRB1) before being discharged to the atmosphere. Also included is a lab etcher used in QA/QC that vents to SCRB1.

Building(s): MAIN

**Item 3.3:**



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

Emission Unit: U-FFLEX

Emission Unit Description:

This unit consists of the FaradFlex process, which is a film lamination process involving two heated presses that are served by three vacuum pumps.

Building(s): MAIN

**Item 3.4:**

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

Emission Unit: U-HWWTP

Emission Unit Description:

This unit consists of the Wastewater Treatment Plant, and includes two chemical storage tanks (FCSTT and SHSTT) that vent to emission point 00442, and the batch spill tank, which vents to emission point 00452.

Building(s): MAIN

**Item 3.5:**

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

Emission Unit: U-PLATE

Emission Unit Description:

This unit consists of plating cells 1 through 20, which will discharge through either of two packed tower scrubbers (SCR2 and SCR3).

Building(s): MAIN

**Item 3.6:**

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

Emission Unit: U-TREAT

Emission Unit Description:

This unit consists of treaters 4 and 5, which will discharge to a Heil Model 734 packed tower scrubber (SCR5).

Building(s): MAIN

**Condition 6: Air pollution prohibited**  
**Effective between the dates of 02/26/1998 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 211.2**

**Item 6.1:**

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity,



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characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

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

**Condition 4: Emission Point Definition By Emission Unit**  
**Effective between the dates of 02/26/1998 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 4.1:**

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

Emission Unit: U-BOILS

Emission Point: 00620

Height (ft.): 42

Diameter (in.): 30

NYTMN (km.): 4751.25

NYTME (km.): 634.35

Building: MAIN

Emission Point: 00660

Height (ft.): 43

Diameter (in.): 24

NYTMN (km.): 4751.25

NYTME (km.): 634.35

Building: MAIN

**Item 4.2:**

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

Emission Unit: U-DISLV

Emission Point: 00241

Height (ft.): 34

Diameter (in.): 24

NYTMN (km.): 4751.25

NYTME (km.): 634.35

Building: MAIN

**Item 4.3:**

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

Emission Unit: U-FFLEX

Emission Point: 00710

Height (ft.): 10

Diameter (in.): 3

NYTMN (km.): 4751.25

NYTME (km.): 634.35

Building: MAIN

**Item 4.4:**



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

Emission Unit: U-HWWTP

Emission Point: 00442

Height (ft.): 24

Diameter (in.): 5

NYTMN (km.): 4751.25 NYTME (km.): 634.35 Building: MAIN

Emission Point: 00452

Height (ft.): 12

Diameter (in.): 8

NYTMN (km.): 4751.25 NYTME (km.): 634.35 Building: MAIN

**Item 4.5:**

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

Emission Unit: U-PLATE

Emission Point: 00210

Height (ft.): 25

Diameter (in.): 24

NYTMN (km.): 4751.25 NYTME (km.): 634.35 Building: MAIN

Emission Point: 00220

Height (ft.): 33

Diameter (in.): 29

NYTMN (km.): 4751.25 NYTME (km.): 634.35 Building: MAIN

Emission Point: 00320

Height (ft.): 34

Diameter (in.): 22

NYTMN (km.): 4751.25 NYTME (km.): 634.35 Building: MAIN

**Item 4.6:**

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

Emission Unit: U-TREAT

Emission Point: 00310

Height (ft.): 40

Diameter (in.): 16

NYTMN (km.): 4751.25 NYTME (km.): 634.35 Building: MAIN

**Condition 5: Process Definition By Emission Unit**

**Effective between the dates of 02/26/1998 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 5.1:**

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

Emission Unit: U-BOILS



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Process: BLR

Process Description:

This process involves the combustion of #4 fuel oil in boilers.

Emission Source/Control: BOIL1 - Combustion

Design Capacity: 25.1 million Btu per hour

Emission Source/Control: BOIL2 - Combustion

Design Capacity: 16.7 million Btu per hour

**Item 5.2:**

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

Emission Unit: U-DISLV

Process: DIS

Process Description:

this process involves dissolving copper wire in sulfuric acid in dissolving towers. Emissions from the dissolving towers and associated tanks are treated in a packed tower wet scrubber.

Emission Source/Control: SCRB1 - Control

Control Type: WET SCRUBBER

Emission Source/Control: DSLT3 - Process

Emission Source/Control: DSLT4 - Process

Emission Source/Control: PROTK - Process

Design Capacity: 1,950 gallons

Emission Source/Control: RECT3 - Process

Design Capacity: 2,600 gallons

Emission Source/Control: RECT4 - Process

Design Capacity: 2,600 gallons

**Item 5.3:**

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

Emission Unit: U-DISLV

Process: ETC

Process Description: This process involves etching for QA/QC purposes.

Emission Source/Control: SCRB1 - Control

Control Type: WET SCRUBBER

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Emission Source/Control: ETCHR - Process

Emission Source/Control: RDSTK - Process

Design Capacity: 2,600 gallons

**Item 5.4:**

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

Emission Unit: U-FFLEX

Process: FLX

Process Description:

This process involves film lamination using two heated presses that are served by three vacuum pumps.

Emission Source/Control: PRES1 - Process

Emission Source/Control: PRES2 - Process

Emission Source/Control: VACP1 - Process

Emission Source/Control: VACP2 - Process

Emission Source/Control: VACP3 - Process

**Item 5.5:**

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

Emission Unit: U-HWWTP

Process: WWT

Process Description:

This process involves the treatment of process wastewater in tanks.

Emission Source/Control: BSTVT - Process

Emission Source/Control: FCSTT - Process

Emission Source/Control: SHSTT - Process

**Item 5.6:**

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

Emission Unit: U-PLATE

Process: PLT

Process Description:

Plating is conducted in plating cells that vent to two

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packed tower scrubbers.

Emission Source/Control: SCRB2 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: SCRB3 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: CELLS - Process  
Design Capacity: 1,000 gallons

**Item 5.7:**

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

Emission Unit: U-TREAT

Process: TRT

Process Description:

Treaters are used for surface modification of copper foil to improve its adhesive characteristics and protect it from corrosion. The treaters vent through a packed tower scrubber.

Emission Source/Control: SCRB5 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: TRTR4 - Process

Emission Source/Control: TRTR5 - Process