

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 7-0346-00032/00209 Modification Number: 2**



**04/19/2007**

**Facility Identification Data**

Name: ENDICOTT INTERCONNECT TECHNOLOGIES INC  
Address: 1701 NORTH ST  
ENDICOTT, NY 13760

**Owner/Firm**

Name: ENDICOTT INTERCONNECT TECHNOLOGIES INC  
Address: 1701 NORTH STREET  
ENDICOTT, NY 13760, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:  
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Address: ENDICOTT INTERCONNECT TECHNOLOGIES INC  
1701 NORTH ST  
ENDICOTT, NY 13760  
Phone:6077556179

**Permit Description**

**Introduction**

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

**Summary Description of Proposed Project**

EIT operates four large boilers (all about 150 mmBtu/hr heat input), each of which is capable of burning either No. 6 oil or natural gas. EIT is presently restricted from combusting oil in two permit conditions:

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Condition 59 is a long-standing condition (1983) limiting fuel oil combustion to avoid PSD applicability, and limits fuel oil combustion in Boilers 1 and 2 to 1.07 million gallons/yr each; limits oil firing in Boilers 3 and 4 to 762,000 gallons/yr each; and also places restrictions on natural gas firing. Condition 58 further restricts fuel oil combustion to those periods where natural gas is physically unavailable (i.e., curtailed), and those periods where oil is combusted for reasons of maintenance. These fuel oil restrictions were placed on the boilers because of the boilers' inability to comply with Nox RACT while burning No. 6 oil. The sulfur content of No. 6 oil is restricted to 0.3%.

EIT wishes to eliminate No. 6 oil from the site, permanently; to do so, they would combust the fuel. In place of No. 6 oil, they want to bring No. 2 oil on-site, and eliminate Condition 58, which prohibits fuel oil combustion when natural gas is available. Compliance with NOx RACT will be achieved using a system average while combusting No. 6 oil, and individually while combusting No. 2 oil. They will still have the emissions caps in Condition 59.

**Attainment Status**

ENDICOTT INTERCONNECT TECHNOLOGIES INC is located in the town of UNION in the county of BROOME.

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

<b>Criteria Pollutant</b>	<b>Attainment Status</b>
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone* ATTAINMENT)	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

\* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.  
\*\* NOx has a separate ambient air quality standard in addition to being an ozone precursor

**Facility Description**

IBM ENDICOTT IS A MANUFACTURING AND DEVELOPMENT FACILITY LOCATED 60 MILES SOUTH OF SYRACUSE, NY IN THE SUSQUEHANNA VALLEY REGION. THE FACILITY IS LOCATED AT 1701 NORTH STREET IN ENDICOTT, NY AND COVERS

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APPROXIMATELY 4 MILLION SQUARE FEET AND EMPLOYS NEARLY 6,500. THE SITE MISSION INCORPORATES THE FOLLOWING PROCESSES AND ACTIVITIES: 1) DEVELOP AND MANUFACTURE SEMICONDUCTOR PACKAGING PRODUCTS FOR INTERNAL AND OEM DISTRIBUTION AND SALE. THE PRIMARY IBM MANUFACTURING AND DEVELOPMENT TENANTS INCLUDING THE INTERCONNECT PRODUCTS BUSINESS UNIT WHICH SUPPORTS THE IBM MICROELECTRONICS DIVISION, OTHER IBM DIVISIONS AND OEM CUSTOMERS WITH INTERCONNECT PACKAGING PRODUCTS: 2) PROVIDE PRODUCT END-OF-LIFE MANAGEMENT (PELM) SERVICES TO ALL OF IBM AND SELECT OEM CUSTOMERS THROUGH THE GLOBAL ASSET RECOVERY SERVICES (GARS) ENDICOTT ASSET RECOVERY SERVICES (ARC); THESE SERVICES INCLUDE TRANSPORT, DISASSEMBLY AND RECYCLING OF ALL MANNER OF INFORMATION TECHNOLOGY (I/T) EQUIPMENT AS WELL AS OBSOLETE AND SURPLUS MANUFACTURING INVENTORY AND ENDICOTT SITE MANUFACTURING SCRAP. 3) MAKE EXISTING MANUFACTURING, LABORATORY AND OFFICE SPACE AVAILABLE TO IBM ORGANIZATIONS AND TO EXTERNAL CORPORATIONS FOR LEASE, SUCH AS WITH THE INTERNATIONAL FLEX TECHNOLOGY (IFT) ORGANIZATION. THIS INCLUDES WASTE DISPOSAL AND RECYCLING SERVICES AS WELL AS SOURCING CHEMICALS AND OTHER MANUFACTURING SUPPLIES, PERMITTING, REPORTING AND TRACKING AND DOCUMENTATION SERVICES. THE PRIMARY SITE RESIDENTS AND TEAMS AT IBM ENDICOTT, INCLUDING THEIR PRIMARY PRODUCT, INCLUDE 1. IBM MICROELECTRONICS DIVISION (IMD), A) ELECTRONIC PACKAGING MANUFACTURING, B) PREPREG MANUFACTURING, C) PRINTED WIRING BOARDS (PWB) MANUFACTURING, D) CHIP CARRIERS (CERAMIC, ORGANIC, PLASTIC), E) FLEXIBLE CIRCUITS, F) DIGITAL VIDEO CHIP DESIGN, G) CIRCUIT DESIGN, H) ENGINEERING AND MANUFACTURING SERVICES, AND TOOL AND MODEL SHOP, 2. PRINTING SYSTEMS DIVISION (MIDRANGE PRINTER REPACKAGING), 3. BANKS MACHINES MANUFACTURING, 4. GLOBAL ASSET RECOVERY SERVICES (ARC), 5. IBM GLOBAL SERVICES, 6. AS/400 PROGRAMMING LABORATORY, 7. S/390 DEVELOPMENT HARDWARE AND SOFTWARE DEVELOPMENT, 8. NATIONAL ACCOUNTING SERVICES, 9. INTERNATIONAL FLEX TECHNOLOGY (IFT) - ONSITE MANUFACTURING TENANT. FOR THE PURPOSES OF THIS TITLE V APPLICATION, IBM HAS DECIDED TO CREATE ITS EMISSION UNITS BASED ON THESE PRIMARY TEAMS AND PRODUCTS. THERE ARE SIXTEEN (16) EMISSION UNITS IDENTIFIED WITHIN THE TITLE V PERMIT APPLICATION. THESE ARE: 1) B-25900 B/259 PREPREG MANUFACTURING OPERATIONS, 2) R-CABM1 B/18 PRINTED WIRING BOARD MANUFACTURING OPERATIONS, 3) R-CABM2 B/41 PRINTED WIRING BOARD MANUFACTURING OPERATIONS, 4) R-CABM3 B/47 PRINTED WIRING BOARD MANUFACTURING OPERATIONS, 5) R-CABM4 OTHER PRINTED WIRING BOARD MANUFACTURING OPERATIONS (INCLUDING TENANT - IFT - OPERATIONS), 7) LCC&SP LAMINATE CHIP CARRIER AND SUBSTRATE PRODUCT MFG. 8) P-BANDS B/57 PRINT BAND OPERATIONS, 9) A-SSEMB B/41 BACKPANEL ASSEMBLY OPERATIONS, 10) B-39000 SITE BOILERS AND ASSOCIATED POWERHOUSE OPERATIONS, 11) B-96000 SITE WASTE TREATMENT OPERATIONS AND ASSOCIATED OPERATION, 12) A-SSET SITE ASSET RECOVERY SERVICES OPERATIONS, 13) F-ACILISI TEWIDE FACILITIES' SUPPORT SYSTEMS, 14) T-MSHOP TOOL AND MODEL SHOP OPERATIONS, 15) B-ANKS BACK MACHINES MANUFACTURING OPERATIONS, 16) V-IDEO DIGITAL VIDEO PRODUCTS CHIP DESIGN SUPPORT OPERATIONS.

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**Permit Structure and Description of Operations**

The Title V permit for ENDICOTT INTERCONNECT TECHNOLOGIES INC is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device.

[NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

ENDICOTT INTERCONNECT TECHNOLOGIES INC is defined by the following emission unit(s):  
Emission unit B39000 - THIS EMISSION UNIT CONSISTS OF EIT'S ON-SITE POWERHOUSE AND ASSOCIATED BOILER SYSTEMS THAT ARE USED TO GENERATE PROCESS STEAM/HEAT FOR THE ENTIRE SITE. THIS UNIT CONSISTS OF FOUR "LARGE" BOILERS THAT USE NATURAL GAS AS A PRIMARY FUEL, AND NO.6 FUEL OIL AS AN EMERGENCY BACK-UP FUEL.

Emission unit B39000 is associated with the following emission points (EP):  
39001, 39002, 39003, 39004

It is further defined by the following process(es):

Process: GAS is located at 3, Building 39 - B/39 POWERHOUSE OPERATIONS - FOUR LARGE BOILERS OPERATING WITH NATURAL GAS.

Process: OIL is located at 3, Building 39 - B/39 POWERHOUSE OPERATIONS - FOUR LARGE BOILERS OPERATING WITH FUEL OIL.

Emission unit RCABM4 - THIS EMISSION CONSISTS OF PROCESS EQUIPMENT LOCATED IN BUILDINGS 2,4,14,21,26 AND 53 THAT SUPPORTS THE MANUFACTURE OF PRINTED CIRCUIT BOARDS. THESE OPERATIONS INCLUDE SURFACE PREPARATION, LAMINATION OF COPPER FOIL/LAYERS, CIRCUITIZATION (INCLUDING PHOTORESIST APPLY, RESIST EXPOSE, RESIST DEVELOP, METAL ETCHING, AND RESIST STRIPPING), DRILLING, HOLE

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DESMEAR, HOLE PLATING, PROTECTIVE COATING SEQUENCE (SOLDERMASK APPLY, EXPOSE, DEVELOP AND CURE), AND FINISH OPERATIONS (PAD PLATING VIA TIN/LEAD GOLD, INSPECTION, TEST, PROFILE AND STOCK).

Emission unit RCABM4 is associated with the following emission points (EP):

02008, 02010, 02016, 02021, 02024, 21029, 21076, 21079, 21086, 53001, 53002, 53003, 53005, 53010, 53011, 53012, 53013

It is further defined by the following process(es):

Process: CN1 is located at Building 53 - B/53 SOLDERMASK CURE OPERATIONS INCLUDING ASSOCIATED OVENS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT A-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 1.0 POUND/HR AND B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR (SUBJECT TO PART 212).

Process: CO1 is located at Building 53 - B/53 SOLDERMASK APPLY/SCREEN OPERATIONS INCLUDING AUTOSCREEN COATER #1, DIAZO DEVELOPER, SOLDERMASK CURE/DRY OPERATIONS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT A-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 1.0 POUND/HR AND B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR (SUBJECT TO PART 212).

Process: CP1 is located at Building 53 - B/53 ENTEK SURFACE OXIDATION REMOVAL LINES # 1 AND #2 WITH ASSOCIATED SUPPORT SYSTEMS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: CQ1B/53 PANEL DRILL OPERATIONS WITH ASSOCIATED DUST COLLECTOR. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT SOLID PARTICULATES (SUBJECT TO PART 212).

Process: CR1 is located at Building 53 - B/53 PROTECTIVE COATING APPLICATION PROCESS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Process: CS1 is located at Building 53 - B/53 CHROME MASK FABRICATION PROCESS AND PROTECTIVE COAT DEVELOPMENT LINE (WITH ASSOCIATED SINKS AND HOODS). THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Process: CT1 is located at Building 53 - B/53 SOLDERMASK APPLY/SCREEN OPERATIONS INCLUDING FOUR SCREEN PRINTERS, SUPPORT HOODS, OVENS AND DEVELOPER. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: CU1 is located at Building 53 - B/53 DYNAMOTION DRILL MACHINE. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT SOLID PARTICULATES (SUBJECT TO PART 212).

Process: GK1 is located at 2, Building 21 - B/21 FLUX APPLY PROCESS/ SOLDER REFLOW OVEN OPERATIONS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: GL1 is located at 2, Building 21 - B/21 SOLDER REFLOW APPLY OPERATIONS AND OVENS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED

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POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: GM1 is located at 2, Building 21 - B/21 HOLE DRILL OPERATIONS WITH ASSOCIATED DUST COLLECTORS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT SOLID PARTICULATES (SUBJECT TO PART 212).

Process: GN1 is located at 2, Building 21 - B/21 PROCESS SUPPORT OVENS.

Process: PQ1 is located at 2, Building 2 - B/02 SOLDER REFLOW OVENS, STENCIL CLEAN OPERATIONS AND PROCESS SUPPORT OVENS.

Process: QQ1 is located at 2, Building 2 - B/02 SOLDER PASTE APPLY AND SOLDER REFLOW AND ADHESIVE CURE OVENS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT SOLID PARTICULATES (SUBJECT TO PART 212).

Process: RQ1 is located at 2, Building 2 - B/02 WAVE SOLDER PROCESS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: SQ1 is located at 2, Building 2 - B/02 RESIST COATER (APPLY) AND DRYER.

Process: TQ1 is located at 2, Building 2 - B/02 SOLDER SPRAY FLUXER. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT SOLID PARTICULATES (SUBJECT TO PART 212).

Emission unit PBANDS - THIS EMISSION UNIT INCLUDES SUPPORT SERVICES IN B/57 THAT SUPPORT THE PRINTBAND PERSONNEL IN THIS BUILDING. THESE OPERATIONS ARE NOT TYPICAL PRODUCT MANUFACTURING OPERATIONS, BUT SUPPORT OPERATIONS SUCH AS REPRODUCTION CENTER OPERATIONS. AT THIS TIME, ALL ACTIVITIES IN THIS EMISSION UNIT ARE TRIVIAL OR EXEMPT.

Emission unit B96000 - THIS EMISSION UNIT CONSISTS OF IBM'S B/96 WASTE TREATMENT FACILITY, INCLUDING ALL OF ITS CHEMICAL TREATMENT SYSTEMS AND SUPPORT EQUIPMENT FOR BOTH SITE MANUFACTURING WASTE WATER SYSTEMS, AS WELL AS REMEDIATED GROUNDWATER.

Emission unit B96000 is associated with the following emission points (EP):  
96004, 96005, 96024, 96029

It is further defined by the following process(es):

Process: CAU is located at 1, Building 96 - B/96 WASTE TREATMENT OPERATIONS - PACKED TOWER / AIR STRIPPER FOR GROUNDWATER REMEDIATION AND PLANT SOLVENT WATER TREATMENT, INCLUDING ASSOCIATED AIR ABATEMNT SYSTEM (CAU). THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT A-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 1.0 POUND/HR AND B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR. THIS EMISSION SOURCE IS SUBJECT TO 6 NYCRR 212 VOC RACT.

Process: F24 is located at 1, Building 96 - B/96 WASTE TREATMENT PLANT OPERATIONS, INCLUDING BIO, CHROME, PERSULFATE, AND GENERAL RINSE TREATMENT (INCLUDING ASSOCIATED ABATEMENT SYSTEM (SCRUBBER)). THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Process: LST is located at 1, Building 96 - B/96 WASTE TREATMENT PLANT LIME SLURRY TANK FOR PH ADJUSTMENT. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS

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EMIT SOLID PARTICULATES (SUBJECT TO PART 212).

Emission unit FACILI - THIS EMISSION UNIT CONSISTS OF OPERATIONS THAT SUPPORT THE SITE'S MANUFACTURING OPERATIONS, SUCH AS CHEMICAL SUPPLY AND WASTE TANK STORAGE AREAS. THIS UNIT ALSO INCLUDES THE SITE'S EMERGENCY GENERATORS AND MISCELLANEOUS SMALL SITEWIDE BOILER SYSTEMS (WHICH USE EITHER NATURAL GAS OR FUEL OIL). AT THIS TIME, ALL ACTIVITIES IN THIS EMISSION UNIT ARE TRIVIAL OR EXEMPT.

Emission unit RCABM1 - THIS EMISSION UNIT CONSISTS OF PROCESS EQUIPMENT LOCATED IN B/18 THAT SUPPORTS THE MANUFACTURE OF PRINTED CIRCUIT BOARDS AND CERTAIN LAMINATE CHIP CARRIERS. THESE OPERATIONS INCLUDE SURFACE PREPARATION, LAMINATION OF COPPER FOIL/LAYERS, CIRCUITIZATION (INCLUDING PHOTORESIST APPLY, RESIST EXPOSE, RESIST DEVELOP, METAL ETCHING, AND RESIST STRIPPING), DRILLING, HOLE DESMEAR, HOLE PLATING, PROTECTIVE COATING SEQUENCE (SOLDERMASK APPLY, EXPOSE, DEVELOP AND CURE), AND FINISH OPERATIONS (PAD PLATING VIA TIN/LEAD GOLD, INSPECTION, TEST, PROFILE AND STOCK).

Emission unit RCABM1 is associated with the following emission points (EP): 18444, 18659, 18681, 18682, 18683, 18685, 18690, 18691, 18692, 18695

It is further defined by the following process(es):

Process: AI1 is located at 3, Building 18 - B/18 DEVELOP, ETCH AND STRIP (DES) OPERATIONS INCLUDING FOUR MANUFACTURING LINES (D320 DES LINE, NORTH DES, SOUTH DES AND FINELINE DES) -EXHAUSTS ONLY DEVELOP AND STRIP SECTIONS OF EACH PROCESS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: AJ1 is located at 3, Building 18 - B/18 COPPER FOIL LAMINATION PROCESSES AND ASSOCIATED PRECLEAN PROCESSES. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: AK1 is located at 3, Building 18 - B/18 ACID COPPER DES LINE (ACL) DEVELOP AND STRIP SECTIONS ONLY. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: AL1 is located at 3, Building 18 - B/18 ACID COPPER PLATING LINE AND ASSOCIATED AIR ABATEMENT SYSTEM (SCRUBBER) (EXHAUST HALF OF PROCESS). THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT A-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 1.0 POUND/HR, B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Process: AM1 is located at 3, Building 18 - B/18 ACID COPPER PLATING LINE AND ASSOCIATED AIR ABATEMENT SYSTEM (SCRUBBER) (EXHAUST SECOND HALF OF PROCESS AL1). THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT A-RATED POLLUTANTS WITH AN EMISSION RATE POTENTIAL LESS THAN 1.0 POUND/HR, B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

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Process: AN1 is located at 3, Building 18 - B/18 DES LINES (ETCHING SECTIONS ONLY), PLATERS AND ASSOCIATED AIR ABATEMENT (SCRUBBER) INCLUDES FIVE DES LINE ETCHERS (D320 DES, NORTH DES, SOUTH DES, FINELINE DES AND ACL DES), CHEM POLISH, FLUID HEAD ETCHER, THIN PANEL PLATER, AND DEBURR/DESMEAR PROCE SS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT A-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 1.0 POUND/HR, B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Process: HP1 is located at 3, Building 18 - B/18 HORIZONTAL DESMEAR AND ELECTROLESS COPPER PLATER WITH ASSOCIATED AIR ABATEMENT SYSTEM (SCRUBBER). THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT A-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 1.0 POUND/HR AND B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Process: KG1B/18 WASTE TREATMENT (GENERAL RINSE SYSTEM) TRANSFER TANKS FOR MANUFACTURING INORGANIC PROCESS WASTES. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: SD1 is located at 3, Building 18 - B/18 DEBURR MACHINE AND WASTE TANK. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: VP1 is located at 3, Building 18 - B/18 VERTICAL ACID COPPER PLATER AND ASSOCIATED AIR ABATEMENT SYSTEM (SCRUBBER). THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT A-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 1.0 POUND/HR, B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Emission unit RCABM2 - THIS EMISSION CONSISTS OF PROCESS EQUIPMENT LOCATED IN B/41 THAT SUPPORTS THE MANUFACTURE OF PRINTED CIRCUIT BOARDS. THESE OPERATIONS INLCUDE SURFACE PREPARATION, LAMINATION OF COPPER FOIL/LAYERS, CIRCUITIZATION (INCLUDING PHOTORESIST APPLY, RESIST EXPOSE , RESIST DEVELOP, METAL ETCHING, AND RESIST STRIPPING), DRILLING, HOLE DESMEAR, HOLE PLATING, PROTECTIVE COATING SEQUENCE (SOLDERMASK APPLY, EXPOSE, DEVELOP AND CURE), AND FINISH OPERATIONS (PAD PLATING VIA TIN/LEAD GOLD, INSPECTION, TEST, PROFILE AND STO CK).

Emission unit RCABM2 is associated with the following emission points (EP):  
41171

It is further defined by the following process(es):

Process: CH1 is located at 2, Building 41 - B/41 GOLD LINE (LAMINATIONS, PLATING, DEVELOP, STRIP) OPERATIONS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT A-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 1.0 POUND/HR AND B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Emission unit RCABM3 - THIS EMISSION CONSISTS OF PROCESS EQUIPMENT LOCATED IN

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B/47 THAT SUPPORTS THE MANUFACTURE OF PRINTED CIRCUIT BOARDS. THESE OPERATIONS INCLUDE SURFACE PREPARATION, LAMINATION OF COPPER FOIL/LAYERS, CIRCUITIZATION (INCLUDING PHOTORESIST APPLY, RESIST EXPOSE , RESIST DEVELOP, METAL ETCHING, AND RESIST STRIPPING), DRILLING, HOLE DESMEAR, HOLE PLATING, PROTECTIVE COATING SEQUENCE (SOLDERMASK APPLY, EXPOSE, DEVELOP AND CURE), AND FINISH OPERATIONS (PAD PLATING VIA TIN/LEAD GOLD, INSPECTION, TEST, PROFILE AND STOCK).

Emission unit RCABM3 is associated with the following emission points (EP):

47174, 47177, 47187, 47188, 47189, 47194, 47197, 47200, 47201, 47203, 47204, 47205, 47209, 47217, 47228, 47230, 47231, 47234, 47242, 47246, 47247

It is further defined by the following process(es):

Process: AO1 is located at 2, Building 47 - B/47 BAKER WET LINE #4 LAMINATIONS PROCESS WHERE METAL COLLOID IS DEPOSITED ON SURFACE OF PANEL MATERIAL. B/47 SOLVENT PLATE CLEAN HOOD TO REMOVE EPOXY LAMINATIONS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: AQ1 is located at 2, Building 47 - B147 Baker Wet Line #4 lamination process where metal colloid is deposited on surface of paint material. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: AR1 is located at 2, Building 47 - B/47 BAKER WET LINE #5 LAMINATIONS PROCESS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: AS1 is located at 2, Building 47 - B/47 TIN-LEAD PLATING LINE. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: AT1 is located at 2, Building 47 - B/47 BENZYL ALCOHOL STRIPPER, PROPYLENE CARBONATE DEVELOPER AND ASSOCIATED OVENS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: AV1 is located at Building 47 - B/47 CUPRIC CHLORIDE ETCHER. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: AW1 is located at 2, Building 47 - B/47 HOLE PUNCHES / PRESSES AND ASSOCIATED DUST COLLECTOR. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT SOLID PARTICULATES (SUBJECT TO PART 212). THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Process: AX1 is located at 2, Building 47 - B/47 CHORITE/ BOND FILM LINES #1 AND #2 (LAMINATIONS & SURFACE PREP PROCESSES) - INCLUDING AIR ABATEMENT SYSTEM (SCRUBBER).

Process: AY1 is located at 2, Building 47 - B/47 ADDITIVE PLATING PROCESS AND STRIPLING SUPPORT PROCESSES WITH ASSOCIATED AIR ABATEMENT SYSTEM (SCRUBBER). THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT A-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 1.0 POUND/HR, B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES

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(SUBJECT TO PART 212).

Process: AZ1 is located at 2, Building 47 - B/47 ELECTROLESS GOLD PLATING LINE WITH ASSOCIATED AIR ABATEMENT SYSTEM (SCRUBBER). THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT A-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 1.0 POUND/HR, B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Process: BA1 is located at 2, Building 47 - B/47 ADDITIVE PLATING SUPPORT EQUIPMENT AND ASSOCIATED PROCESS HOODS AND DRYERS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT A-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 1.0 POUND/HR AND B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: BB1 is located at 2, Building 47 - B/47 EAST AND WEST ADDITIVE PLATING LINES SUPPORT EQUIPMENT AND ASSOCIATED PROCESS HOODS AND DRYERS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT A-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 1.0 POUND/HR, B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Process: BE1 is located at 2, Building 47 - B/47 AMMONIA CAL ETCH LINE SUPPORT TANKS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: BF1 is located at 2, Building 47 - B/47 SOLDERMASK COATING OPERATIONS AND LAMINATORS (INCLUDING SUPPORT OVENS AND HOODS). THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: BG1 is located at 2, Building 47 - B/47 AMMONIA ETCH LINE, AQUEOUS DEVELOPER; SEMI-AQUEOUS DEVELOPER, BORDER ETCH LINE AND PRECLEAN. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: BH1 is located at 2, Building 47 - B/47 PLASMA ETCHERS #1 AND #2. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: BI1 is located at 2, Building 47 - B/47 HOLE DRILL OPERATIONS AND ASSOCIATED DUST COLLECTOR. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT SOLID PARTICULATES (SUBJECT TO PART 212).

Process: BJ1 is located at 2, Building 47 - B/47 PROPYLENE CARBONATE DEVELOPER AND STRIPPER. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: JD1 is located at 2, Building 47 - B/47 LAMINATOR.

Process: LX1 is located at 2, Building 47 - B/47 SEED WETLINE SUPPORT SYSTEMS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: XE1 is located at 2, Building 47 - B/47 PUMICE MIX OPERATIONS AND TANK AND ASSOCIATED DUST COLLECTOR. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT SOLID PARTICULATES (SUBJECT TO PART 212).

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Emission unit RCABM5 - THIS EMISSION CONSISTS OF PROCESS EQUIPMENT LOCATED IN B/258 THAT SUPPORTS THE MANUFACTURE OF PRINTED CIRCUIT BOARDS (BLUE DEVIL PRODUCT). THESE OPERATIONS INCLUDE SURFACE PREPARATION, LAMINATION OF COPPER FOIL/LAYERS, CIRCUITIZATION (INCLUDING PHOTORESIST APPLY, RESIST EXPOSE, RESIST DEVELOP, METAL ETCHING, AND RESIST STRIPPING), DRILLING, HOLE DESMEAR, HOLE PLATING, PROTECTIVE COATING SEQUENCE (SOLDERMASK APPLY, EXPOSE, DEVELOP AND CURE), AND FINISH OPERATIONS (PAD PLATING VIA TIN/LEAD GOLD, INSPECTION, TEST, PROFILE AND STOCK). THIS EMISSION ALSO CONTAINS FLEX CONNECTOR MANUFACTURING SOURCES OF IBM'S ON-SITE VENDOR INTERNATIONAL FLEX TECHNOLOGY (IFT).

Emission unit RCABM5 is associated with the following emission points (EP): 25801, 25802, 25805, 25807, 25808, 25810

It is further defined by the following process(es):

Process: AA1 is located at Building 258 - B/258 CUPRIC ETCH SUPPORT, LAMINATORS, LAMINATIONS PRESSES, SPRAY HOODS, FUME HOODS AND OVENS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Process: AA2 is located at Building 258 - B/258 VENDER OPERATIONS (INTERNATIONAL FLEX TECHNOLOGY) INCLUDING ROLL MFG. LINE LAMINATORS, EXPOSE, SOLDER REFLOW OVENS, HOODS, PROCESS OVENS, AND ESI LASER DRILL. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: AA3 is located at Building 258 - B/258 ELECTRO DEPOSITED (ED) RESIST COATER OVENS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: AA4 is located at Building 258 - B/258 PHOTSENSITOMETRY OVENS AND FUME HOOD. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: AB1 is located at Building 258 - B/258 BLUE DEVIL CIRCUIT BOARD MANUFACTURING PROCESSES, INCLUDING ACID COPPER ELECTROPLATE, AQUEOUS STRIP/DEVELOP, PRECLEAN, CUPRIC ETCH, ED RESIST DEVELOP, CHROME LINE (AND ENGINEERING CONSOLE), PHOTOLAB STRIPPER, PHOTOLAB DEVELOPER, SEEDER/FINELINE PROC ESS AND WET LINES #1 AND #2 COPPER ETCHERS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT A-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 1.0 POUND/HR AND B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: AC1 is located at Building 258 - B/258 THIN FILM PROCESSES (INCLUDING AQUEOUS DEVELOP, DEVELOP, KAPTON ETCH, STRIP, WEB CLEAN), PAD ON PAD PLATER AND ENGINEERING PLATING LINE. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT A-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 1.0 POUND/HR AND B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: AD1 is located at Building 258 - B/258 VENDER OPERATIONS (INTERNATIONAL FLEX TECHNOLOGY) INCLUDING BRANSON PARTS CLEANER, BTA DIP PLATING PROCESS, ROLL AQUEOUS DEVELOPER AND SUPPORT. THE EMISSION SOURCES ASSOCIATED WITH

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THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: AE1 is located at Building 258 - B/258 VENDER OPERATIONS (INTERNATIONAL FLEX TECHNOLOGY) INCLUDING ROLL BTA DIP PLATING PROCESS WITH ASSOCIATED AIR ABATEMENT SYSTEM (SCRUBBER). B/258 ETCH OPERATIONS (CHROME ETCHERS, COPPER ETCHERS, CUPRIC CHLORIDE ETCHER), PLASMA REACTOR, REEL-TO-REEL PLATER, CUPRIC CHLORIDE ETCHER, INTERPOSER PLATER WITH ASSOCIATED ABATEMENT SYSTEM (SCRUBBER). THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT A-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 1.0 POUND/HR, B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Process: AE2 is located at Building 258 - B/258 vendor operations (International Flex Technologies), including roll BTA dip plating process with associated air abatement system (scrubber). THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Process: AE3 is located at Building 258 - Building 258 vendor operations. Non-scrubbed portions of process AE1. The emission sources associated with this process emit B-rated pollutants at an emission rate potential less than 10 pounds/hr.

Process: AF1 is located at Building 258 - B/258 KAPTON CIRCUIT ETCHING PROCESS AND ASSOCIATED AIR ABATEMENT SYSTEM (SCRUBBER). THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Process: AG1 is located at Building 258 - B/258 CIRCUIT PANEL LAY-UP TABLES AND PUNCH; WITH ASSOCIATED DUST COLLECTOR. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT SOLID PARTICULATES (SUBJECT TO PART 212).

Process: MZ1 is located at Building 258 - B/258 ELECTRODEPOSITED (ED) RESIST COATER AND SUPPORT SYSTEMS, INCLUDING ASSOCIATED AIR ABATEMENT SYSTEM ( SCRUBBER). THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Process: PH1 is located at Building 258 - B/258 PLATED THROUGH HOLE (PTH) COPPER PLATER WITH ASSOCIATED AIR ABATEMENT SYSTEM ( SCRUBBER). THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT A-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 1.0 POUND/HR, B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Emission unit TMSHOP - THIS EMISSION UNIT CONSISTS OF PROCESSES THAT ARE UTILIZED BY THE SITE'S TOOL AND MODEL SHOP GROUP. THESE PROCESSES ARE USED FOR CRAFTING PRECISION METAL OR PLASTIC PRODUCTION PARTS, MODELS OR SPECIALTY ITEMS. THE PROCESSES INCLUDE INJECTION PRESSES, SOLDER STATIONS, BUFFERS, SANDERS, DRILLS, LATHES AND NUMEROUS OTHER TOOLING PROCESSES.

Emission unit TMSHOP is associated with the following emission points (EP):

41144

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It is further defined by the following process(es):

Process: TM1 is located at 3, Building 41 - B/41 TOOL AND MODEL SHOP INJECTION MOLDING PROCESSES, OVENS AND HOODS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Emission unit ULCCSP - THIS EMISSION UNIT CONSISTS OF B/18, B/21 AND B/41 MANUFACTURING PROCESSES USED IN THE PRODUCTION OF LAMINATE CHIP CARRIERS. THESE OPERATIONS INCLUDE SURFACE PREPARATION, LAMINATION, CIRCUITIZATION (INCLUDING PHOTORESIST APPLY, RESIST EXPOSE, RESIST DEVELOP, METAL ETCHING AND RESIST STRIPPING), DRILLING, HOLE DESMEAR, HOLE PLATING, AND FINISH OPERATIONS.

Emission unit ULCCSP is associated with the following emission points (EP):

18674, 18680, 21006, 41149, 41157, 41158, 41159, 41192, 41195

It is further defined by the following process(es):

Process: BP1 is located at 1, Building 18 - B/18 BRIGHT DIP OXIDE REMOVE AND HAND DEVELOP OPERATIONS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: BP2 is located at 1, Building 18 - B/18 CHIP CARRIER BURR REMOVAL PROCESS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: BQ1 is located at Building 18 - B/18 ETCHER #5, PERSULFATE ETCHER AND DEBURR/DESMEAR OPERATIONS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: BV1 is located at 3, Building 41 - B/41 SOLVENT ALTERNATE DEVELOPER, IPA LSI WASH TOOLS WITH ASSOCIATED AIR ABATEMENT SYSTEM (CAU). THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT , B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL IN EXCESS OF 3 POUNDS/HR AND IS SUBJECT TO 6 NYCRR 212.10 VOC RACT.

Process: BY1 is located at 3, Building 41 - B/41 OXIDE REMOVE PROCESS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT , B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: BZ1 is located at 3, Building 41 - B/41 LCC PROCESS ADHESIVE OVENS.

Process: CA1 is located at 3, Building 41 - B/41 SOLDER REFLOW OVENS AND HOOD.

Process: CW1 is located at Building 21 - B/21 ROBOTIC SILICONE ENCAPSULANT APPLY AND BAKE PROCESS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: F15 is located at 2, Building 41 - B/41 ASSEMBLY WAVE SOLDER PROCESS. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Emission unit B25900 - THIS EMISSION UNIT CONSISTS OF TWO B/259 SURFACE COATING PROCESSES (TREATER TOWERS) AND ASSOCIATED CHEMICAL SUPPORT (SUPPLY, STORAGE, MIXING, GRINDING, CUTTING) FOR MANUFACTURING OF RESIN

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IMPREGNATED FIBERGLASS CLOTH (PREPREG) FABRICATED BY RUNNING A FIBERGLASS CLOTH WEB INTO AN EPOXY RESIN/SOLVENT MIXTURE AND THROUGH OVENS TO CURE THE RESIN. THESE PROCESSES ARE CONSIDERED SURFACE COATING OPERATIONS UNDER 6NYCRR PART 228. ADDITIONALLY, TWO THERMAL OXIDATION SYSTEMS ARE PRESENT AS AIR CLEANING DEVICES FOR EACH TREATER TOWER.

Emission unit B25900 is associated with the following emission points (EP):

25901, 25902, 25903, 25905, 25907, 25915

It is further defined by the following process(es):

Process: 004 is located at 1, Building 259 - B/259 MANUFACTURING RELATED FUME HOODS AND FLOW PRESS. THE EMISSION SOURCES IN THIS EMISSION UNIT ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Process: 006 is located at 1, Building 259 - B/259 TREATER TOWER SLITTER/SHEETER OPERATIONS; PUNCHES AND OVENS WITH ASSOCIATED DUST COLLECTORS. THE EMISSION SOURCES IN THIS EMISSION UNIT ASSOCIATED WITH THIS PROCESS EMIT SOLID PARTICULATES (SUBJECT TO PART 212).

Process: 008 is located at 1, Building 259 - B/259 MANUFACTURING RELATED FUME HOODS AND GLOVE BOX. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Process: 1NC is located at 1, Building 259 - B/259 TREATER TOWER #1 (PREPREG MANUFACTURING PROCESS SUBJECT TO 6NYCRR PART 228 SURFACE COATING OPERATION) WITH ASSOCIATED THERMAL OXIDIZER #1. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS SUBJECT TO VOC RACT.

Process: 2NC is located at 1, Building 259 - B/259 TREATER TOWER #2 (PREPREG MANUFACTURING PROCESS SUBJECT TO 6NYCRR PART 228 SURFACE COATING OPERATION) WITH ASSOCIATED THERMAL OXIDIZER #2. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS SUBJECT TO VOC RACT.

Emission unit ASSEMB - THIS EMISSION UNIT CONSISTS OF MANUFACTURING OPERATIONS IN B/46 THAT SUPPORT THE BACKPANEL ASSEMBLY OPERATIONS.

Emission unit ASSEMB is associated with the following emission points (EP):

41004, 41175

It is further defined by the following process(es):

Process: CB1 is located at 2, Building 41 - Backpanel assembly operations. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Process: CE1 is located at 2, Building 41 - Backpanel assembly operations. THE EMISSION SOURCES ASSOCIATED WITH THIS PROCESS EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR AND SOLID PARTICULATES (SUBJECT TO PART 212).

Emission unit 0VIDEO - THIS EMISSION UNIT CONSISTS OF B/32 SUPPORT PROCESSES UTILIZED IN THE MANUFACTURING PROCESS OPERATION ASSOCIATED WITH THE PRODUCTION OF DIGITAL VIDEO PRODUCTS. AT THIS TIME, ALL ACTIVITIES IN THIS EMISSION UNIT ARE TRIVIAL OR EXEMPT.

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Emission unit 0BANKS - THIS EMISSION UNIT CONSISTS OF B/46 SUPPORT PROCESSES UTILIZED IN THE ASSEMBLY OF BANKING SYSTEMS (CHECK READERS, SORTERS). PROCESS OPERATIONS INCLUDE NUMEROUS DEGREASING OPERATIONS AND ASSOCIATED SUPPORT HOODS AND OVENS.

Emission unit 0BANKS is associated with the following emission points (EP):  
46147

It is further defined by the following process(es):

Process: DF1 is located at 3, Building 46 - B/46 BANKING SYSTEM SUPPORT OPERATIONS, INCLUDING DEGREASING HOODS AND OVENS. THE EMISSION SOURCES IN THIS EMISSION UNIT EMIT B-RATED POLLUTANTS AT AN EMISSION RATE POTENTIAL LESS THAN 10 POUNDS/HR.

Emission unit 0ASSET - THIS EMISSION UNIT CONSISTS OF PROCESSES SUPPORTING IBM ENDICOTT'S ASSET REUTILIZATION CENTER (ARC) IN B/46. THE ARC RECEIVES OUTDATED IBM COMPUTER SYSTEMS/PERIPHERALS AND DISMANTLES THE UNITS AND SEGREGATES COMPONENTS TO OPTIMIZE RECYCLING AND REUSE OPPORTUNITIES.

Emission unit 0ASSET is associated with the following emission points (EP):  
38007, 38008, 38010

It is further defined by the following process(es):

Process: CY1 is located at 1, Building 38 - B/38 PAINT SPRAY BOOTH OPERATIONS UTILIZING WATER-BASED OR LOW VOLUME SOLVENT-BASED COATINGS (PART 228 COMPLIANT COATINGS). THE EMISSION SOURCES IN THIS EMISSION UNIT EMIT B-RATED POLLUTANTS, SUBJECT TO 6 NYCRR 228, AND SOLID PARTICULATE MATTER, SUBJECT TO 6 NYCRR 212.4(C).

**Title V/Major Source Status**

ENDICOTT INTERCONNECT TECHNOLOGIES INC is subject to Title V requirements. This determination is based on the following information:

This facility is a major source of VOC, HAP, SO<sub>2</sub>, NO<sub>x</sub> and CO. The facility operates a power house with four dual fueled boilers, and numerous process sources subject to Part 212.

**Program Applicability**

The following chart summarizes the applicability of ENDICOTT INTERCONNECT TECHNOLOGIES INC with regards to the principal air pollution regulatory programs:

<b>Regulatory Program</b>	<b>Applicability</b>
PSD	YES
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO

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NESHAP (MACT - 40 CFR Part 63)	NO
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

**NOTES:**

**PSD** Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

**NSR** New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

**NESHAP** National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

**MACT** Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

**NSPS** New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

**Title IV** Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

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**Title VI** Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

**RACT** Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

**SIP** State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

**Compliance Status**

Facility is in compliance with all requirements

**SIC Codes**

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

<b>SIC Code</b>	<b>Description</b>
3672	PRINTED CIRCUIT BOARDS

**SCC Codes**

SCC or Source Classification Code is a code developed and used by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

<b>SCC Code</b>	<b>Description</b>
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3-13-065-00	ELECTRICAL EQUIPMENT ELECTRICAL EQUIPMENT - SEMICONDUCTOR MANUFACTURING
3-13-065-99	INTEGRATED CIRCUIT MANUFACTURING - GENERAL ELECTRICAL EQUIPMENT ELECTRICAL EQUIPMENT - SEMICONDUCTOR MANUFACTURING SEMICONDUCTOR MFG-MISCELLANEOUS OPERATIONS-GENERAL-SPECIFY MATERIAL
1-02-006-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Over 100 MBtu/Hr
4-02-030-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - SEMICONDUCTORS ORGANIC SOLVENT-SURFACE COATING-SEMICONDUCTORS-SPECIFY SOLVENT

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
0NY210-00-0	OXIDES OF NITROGEN		>= 250 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Sealing - 6NYCRR Part 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

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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 - 6NYCRR Part 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 - 6NYCRR Part 200.7**

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

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

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

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

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

**Item E: Emergency Defense - 6NYCRR Part 201-1.5**

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

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

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

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

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

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

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

**Item F: Recycling and Salvage - 6NYCRR Part 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 G: Prohibition of Reintroduction of Collected Contaminants to the Air - 6NYCRR Part 201-1.8**

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling,

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salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

**Item H: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)**

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

**Item I: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR Part 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 J: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 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 K: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)**

Owners and/or operators of facilities having an issued Title V 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.

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- Item L: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**  
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item M: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**  
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item N: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**  
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item O: Providing Information Upon Request - 6 NYCRR Part 201-6.5(a)(4)**  
The permittee shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The permittee shall also, on request, furnish the Department with copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- Item P: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(a)(5)**  
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

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**Item Q: Property Rights - 6 NYCRR Part 201-6.5(a)(6)**

This permit does not convey any property rights of any sort or any exclusive privilege.

**Item R: Fees - 6 NYCRR Part 201-6.5(a)(7)**

The owner and/or operator of a stationary source shall pay fees to the department consistent with the fee schedule authorized by 6 NYCRR Subpart 482-2.

**Item S: Right to Inspect - 6 NYCRR Part 201-6.5(a)(8)**

Upon presentation of credentials and other documents, as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

- i. Enter upon the permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- iii. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

**Item T: Severability - 6 NYCRR Part 201-6.5(a)(9)**

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

**Item U: Progress Reports and Compliance Schedules - 6 NYCRR Part 201-6.5(d)(5)**

Progress reports consistent with an applicable schedule of compliance must be submitted at least semiannually on a calendar year basis, or at a more frequent period if specified in the applicable requirement or by the Department elsewhere in this permit. These reports shall be submitted to the Department within 30 days after the end of a reporting period. Such progress reports shall contain the

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following:

- i. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- ii. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**Item V: Off Permit Changes - 6 NYCRR Part 201-6.5(f)(6)**

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the Administrator and the Department with written notification in advance of the proposed changes within a minimum of 7 days as required by 6 NYCRR §201-6.5(f)(6).

**Item W: Permit Shield - 6 NYCRR Part 201-6.5(g)**

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person

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causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

**Item X: Reopening for Cause - 6 NYCRR Part 201-6.5(i)**

This Title V permit shall be reopened and revised under any of the following circumstances:

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall

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affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

**Item Y: Required Emission Tests - 6 NYCRR Part 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 6NYCRR Part 202-1.

**Item Z: Visible Emissions Limited - 6 NYCRR Part 211.3**

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.

**Item AA: Open Fires - 6 NYCRR Part 215**

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

**Item BB: 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

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actions under the Clean Air Act brought by the United States or any person.

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

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**Item A: 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.

**Regulatory Analysis**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Short Description</b>	<b>Condition</b>
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	2-10
B-39000	40CFR 52-a.21(c)	Ambient Air Increments	59
B-39000/-/OIL	40CFR 52-a.21(c)	Ambient Air Increments	62
B-39000	40CFR 52-HH	Approval and Promulgation of Implementation Plans - New York	60
FACILITY	40CFR 68	Chemical accident	2-7

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FACILITY	6NYCRR 200.7	prevention provisions	
FACILITY	6NYCRR 201-1.4	Maintenance of equipment.	2-1
FACILITY	6NYCRR 201-6	Unavoidable noncompliance and violations	65
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	24, 43, 44
FACILITY	6NYCRR 201-6.5 (c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	2-3
FACILITY	6NYCRR 201-6.5 (c) (2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	2-4
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	2-5
FACILITY	6NYCRR 201-6.5 (e)	Compliance Certification	2-6
FACILITY	6NYCRR 201-6.5 (f)	Operational flexibility	2-2
FACILITY	6NYCRR 201-6.7 (d)	Significant permit modifications	29
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	31
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	32
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	69
B-96000	6NYCRR 212.10 (c) (4) (i)	NOx and VOC RACT required at major facilities	63
U-LCCSP/41192/BV1	6NYCRR 212.10 (c) (4) (i)	NOx and VOC RACT required at major facilities	64
FACILITY	6NYCRR 212.4 (a)	General Process Emission Sources - emissions from new sources and/or modifications	34, 35, 70, 71
FACILITY	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	36
0-ASSET	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	45
FACILITY	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	37
FACILITY	6NYCRR 225-1.2 (a) (2)	Sulfur in Fuel Limitations Post 12/31/87.	39, 72
FACILITY	6NYCRR 226.2	General Requirements.	40
B-39000	6NYCRR 227-1.2 (a) (2)	Particulate Emissions Firing Liquid Fuels Excluding Distillate Oil. (see narrative)	73
B-39000/-/OIL	6NYCRR 227-1.3 (a)	Smoke Emission Limitations.	61
B-39000	6NYCRR 227-2.4 (b)	Control Requirements for large boilers.	2-8
B-39000	6NYCRR 227-2.5 (b)	System-wide averaging	2-9

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0-ASSET	6NYCRR 228.10	option.	
B-25900	6NYCRR 228.10	No open containers	49
0-ASSET	6NYCRR 228.3 (a)	No open containers	52
		compliant coatings or controls	46
B-25900/-/1NC	6NYCRR 228.3 (b)	controls - 80% overall removal efficiency	53
B-25900/-/2NC	6NYCRR 228.3 (b)	controls - 80% overall removal efficiency	54
0-ASSET	6NYCRR 228.4	Opacity.	47
B-25900	6NYCRR 228.4	Opacity.	50
0-ASSET	6NYCRR 228.5	Reports, recordkeeping, sampling and analysis	48
B-25900	6NYCRR 228.5 (g)	Exhaust gas temperature	51
FACILITY	6NYCRR 229.3 (e) (2) (v)	Volatile organic liquid storage tanks	41

**Applicability Discussion:**

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-301.

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 200-.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to

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determine the compliance status of the facility.

6NYCRR Part 201-6.5(c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(c)(2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6NYCRR Part 201-6.5(c)(3)(ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR Part 201-6.5(e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR Part 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6NYCRR Part 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

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40 CFR Part 68.

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

**Facility Specific Requirements**

In addition to Title V, ENDICOTT INTERCONNECT TECHNOLOGIES INC has been determined to be subject to the following regulations:

40CFR 52-a.21 (c)

In 1983, IBM installed Boiler No 4. This installation was not subject to PSD because the proposed emissions increase was netted with emissions reductions at boilers 1-3. The emissions reductions from the existing boilers are achieved and enforced by fuel use restrictions on both oil and gas. The allowable sulfur limit is also restricted to less than that allowed in 6 NYCRR 225-1.

40CFR 52-HH

Pursuant to Section 110 of the Clean Air Act, the EPA approved, as part of New York's State Implementation Plan, a regulation for the control of particulate matter from fossil fuel fired boilers. This requirement was previously cited as 6 NYCRR Part 227.2(b)(1) and is listed in the table of EPA-approved New York State regulations cited under 40 CFR 52.1679, Subpart HH. The Department has since revised this rule, changing the applicability criteria and the numerical limits. A condition has been added to the permit that requires compliance with this previously approved regulation.

6NYCRR 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, startup, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR 201-6.5 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5 (f)

This regulation defines in general terms under what circumstances changes would be allowed without a permit modification provided the permit contains sufficient operational flexibility provisions. This condition was modified to accommodate NYPIRG's comments. The modification was as follows:

Operational Flexibility Protocol - New Construction of general

The annual compliance certifications required pursuant to 6 NYCRR 201-6.5(e) shall also (1) include compliance certifications for all devices added pursuant to this condition since permit issuance;

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*(2) include a statement that records are maintained on site documenting that exempt and trivial emissions sources continue to satisfy the criteria of 6 NYCRR 201-3.2 and 3.3, and (3) identify any new equipment that was installed without a permit that was not exempt pursuant to 6 NYCRR 201-3.2 or 3.3 and did not comply with the operational flexibility terms of this condition.*

6NYCRR 201-6.7 (d)

The EPA is required to promulgate NESHAP standards for each source category by certain statutory dates. In the event that EPA fails to promulgate such NESHAPs, Section 112(j) of the Clean Air Act requires states to implement a case-by-case MACT for industries in such categories. DEC has included a permit condition in this permit to implement that requirement.

6NYCRR 212.10 (c) (4) (i)

IBM operates processes with ERPs in excess of 3 lb/hr that are subject to 212.10 RACT. For the carbon adsorption process, IBM has chosen to comply with the presumptive RACT requirement, which requires a VOC removal efficiency greater than 81%.

6NYCRR 212.4 (a)

This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

6NYCRR 212.4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to a particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212.6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 225-1.2 (a) (2)

This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6NYCRR 226.2

This reference provides the general requirements that owners and operators of solvent metal cleaning machines must comply with in addition to the other applicable requirements in this part. The general requirements include the proper storage, transfer, and disposal of solvents, the integrity of the equipment must be maintained, a summary of the operating procedures must be displayed, covers are to be closed when a degreaser is not used, and a record of solvent consumption must be maintained for one year.

6NYCRR 227-1.2 (a) (2)

This rule limits particulate emissions to 0.20 pound per million Btu heat input from any stationary combustion installation with a maximum heat input capacity exceeding 50 million Btu per hour but no greater than 250 million Btu per hour using oil (other than distillate oil), coal tar, or any liquid fuel derived from coal.

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6NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6NYCRR 227-2.4 (b)

EIT operates four large boilers subject to NOx RACT. A condition in the permit requires emissions testing to demonstrate compliance.

6NYCRR 227-2.5 (b)

EIT is allowed to burn No. 6 oil provided it also burns natural gas such that the emissions to the atmosphere are no greater than if each boiler emitted NOx at the allowable limit. EIT will comply with NOx RACT using a system average.

6NYCRR 228 .10

The requirements for handling, storage, and disposal of VOCs are provided in this section.

6NYCRR 228 .3 (a)

This reference provides the three options that can be used to control VOC emissions from a surface coating process. The three options are to use a compliant coating (i.e., one that does not exceed the allowable VOC content), the use of a coating system, or the use of air pollution control equipment. This subsection, 228.3(a), requires the use of low-VOC-containing coatings. IBM must keep records sufficient to document compliance.

6NYCRR 228 .3 (b)

An afterburner used to control VOC emissions from a surface coating process must be able to achieve, and maintain, at least an 80 % VOC removal efficiency.

6NYCRR 228 .4

This reference requires the opacity of the emissions from a facility, with surface coating processes subject to this rule, to be less than 20 % during any consecutive six minute period. Opacity limits are used primarily to control the quantity of particulates released from a source.

6NYCRR 228 .5

The owner or operator of any emissions source subject to 6 NYCRR 228 must maintain, and upon request, provide to the DEC certifications from coating vendors/suppliers which verify the parameters used to determine the VOC content of the as-applied coatings. DEC has included a permit condition requiring compliance with this rule.

6NYCRR 228 .5 (g)

This reference provides a list of parameters that must be continuously monitored, and periodically calibrated, at all times that an air cleaning device is operating.

6NYCRR 229 .3 (e) (2) (v)

This section requires the tank to be equipped with conservation vents for storage of volatile organic

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liquids.

**Compliance Certification**

Summary of monitoring activities at ENDICOTT INTERCONNECT TECHNOLOGIES INC:

<b>Location Facility/EU/EP/Process/ES</b>	<b>Type of Monitoring</b>	<b>Cond No.</b>
B-39000	record keeping/maintenance procedures	59
B-39000/-/OIL	monitoring of process or control device	62
B-39000	parameters as surrogate	
B-39000	intermittent emission testing	60
FACILITY	record keeping/maintenance procedures	2-1
FACILITY	record keeping/maintenance procedures	2-5
FACILITY	record keeping/maintenance procedures	2-6
FACILITY	record keeping/maintenance procedures	2-2
FACILITY	record keeping/maintenance procedures	29
FACILITY	record keeping/maintenance procedures	31
B-96000	intermittent emission testing	63
U-LCCSP/41192/BV1	intermittent emission testing	64
FACILITY	record keeping/maintenance procedures	34
FACILITY	record keeping/maintenance procedures	35
FACILITY	record keeping/maintenance procedures	70
FACILITY	record keeping/maintenance procedures	71
FACILITY	monitoring of process or control device	36
	parameters as surrogate	
0-ASSET	intermittent emission testing	45
FACILITY	monitoring of process or control device	37
	parameters as surrogate	
FACILITY	monitoring of process or control device	39
	parameters as surrogate	
FACILITY	monitoring of process or control device	72
	parameters as surrogate	
B-39000	intermittent emission testing	73
B-39000/-/OIL	monitoring of process or control device	61
	parameters as surrogate	
B-39000	intermittent emission testing	2-8
B-39000	intermittent emission testing	2-9
0-ASSET	record keeping/maintenance procedures	49
B-25900	record keeping/maintenance procedures	52
0-ASSET	record keeping/maintenance procedures	46
B-25900/-/1NC	intermittent emission testing	53
B-25900/-/2NC	intermittent emission testing	54
0-ASSET	monitoring of process or control device	47
	parameters as surrogate	
B-25900	monitoring of process or control device	50
	parameters as surrogate	
0-ASSET	record keeping/maintenance procedures	48
B-25900	record keeping/maintenance procedures	51
FACILITY	record keeping/maintenance procedures	41

**Basis for Monitoring**

Part 200.7:

At 6 NYCRR 200.7, sources are required to operate their control devices in a satisfactory state of repair and maintenance. DEC is requiring IBM to submit a plan for maintaining the air pollution control devices at the facility. Such plan is due in 120 days. Numerous conditions in the permit require that

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IBM inspect, on a weekly basis, the operation of the various control devices to evaluate whether the operation falls within the parameters specified in the O&M plan.

Section 212.6 of the New York Code establishes an opacity limit. DEC is requiring IBM to inspect, once per quarter, each emission point that emits particulate matter for compliance with this opacity limit. DEC believes that a frequency of once per quarter is sufficient to assess compliance because the devices to which this standard is subject (1) are not likely to violate the opacity standard, and (2) are subject to the O&M plan requirements of 200.7.

To assure compliance with Part 225-1.2, DEC is requiring fuel oil samples to be analyzed (one sample per delivery).

Section 112(j) requires EPA to promulgate MACT standards for fabric coating, miscellaneous metal parts and products, and boilers. The Act also requires the states to adopt MACT in the event EPA fails to promulgate such standards. To this end, DEC has included a condition requiring IBM to submit a MACT determination in the event that EPA fails to promulgate such standards.

Pursuant to 6 NYCRR 228, DEC is requiring IBM to maintain records of coating formulations. DEC is also requiring IBM to maintain records of exhaust gas temperatures on the thermal oxidizers (1NC and 2NC).

DEC is requiring IBM to record the amounts of fuel it burns as part of an emissions cap used to net out of PSD.

DEC is requiring IBM to either (1) install VOC CEMs at the outlet of carbon adsorbers, or (2) to specify when the carbon bed is spent, and to keep records of regeneration or replacement.

Regarding NO<sub>x</sub> testing on the boilers, DEC is requiring emissions testing once per permit term. Prior testing has shown that, when burning natural gas, the boilers comply with the NO<sub>x</sub> RACT limit by a wide margin (0.167 lb No<sub>x</sub>/mmBtu versus 0.30). EPA emission factors predict NO<sub>x</sub> emissions from Number 2 oil will be 0.143 lb/mmBtu, again, well in compliance with the applicable limit. There are no add-on controls, so control equipment parametric monitoring is non-applicable. Testing will be conducted under normal operating conditions at three operating loads. DEC has no reason to suspect that No<sub>x</sub> emissions from these boilers will vary significantly over the course of time. Because of the wide margin of compliance, and because DEC doesn't expect the emissions to vary significantly over time, testing more frequent than once per permit term is unwarranted.

EPA guidance seems to agree with this position. EPA, in White Paper No. 2, states, "The frequency of required monitoring and testing that DEC requires is a function of the expected margin of compliance, and the potential variability in operation of sources. The requirement to include in a permit testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor with respect to all emissions units and applicable requirement situations. It does not require extensive testing or monitoring to assure compliance with the applicable requirements for emissions units that do not have significant potential to violate emissions limitations or other requirements under normal operating conditions. In particular, where the establishment of a regular program of monitoring would not significantly enhance the ability of

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the permit to assure compliance with the applicable requirement, the permitting authority can provide that the status quo (i.e., no monitoring) will meet § 70.6(a)(3)(i)."