



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 7-0346-00032/00209

Renewal Number: 1

Modification Number: 1 11/04/2011

Facility Identification Data

Name: ENDICOTT INTERCONNECT TECHNOLOGIES INC

Address: 1093 CLARK ST

ENDICOTT, NY 13760

Owner/Firm

Name: ENDICOTT INTERCONNECT TECHNOLOGIES INC

Address: 1093 CLARK ST

ENDICOTT, NY 13760, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

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Name: PAUL A SPERANZA

Address: ENDICOTT INTERCONNECT TECHNOLOGIES INC

1093 CLARK ST

ENDICOTT, NY 13760

Phone: 607 755 6179

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

This action (1) allows for the consolidation (relocation) of numerous campus-wide emission sources into fewer buildings, (2) the installation of equipment that was accomplished under the operational flexibility provisions of Part 201, and (3) the incorporation of conditions allowing the owner or operator to demonstrate compliance with 40 CFR Part 63, Subpart OOOO by demonstrating that the organic HAP emissions



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rate is less than 0.08 kg HAP per kg of solids applied.

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.)

Criteria Pollutant	Attainment Status
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Particulate Matter (PM)	ATTAINMENT
Particulate Matter< 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	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:

EIT manufactures electronic components, primarily printed circuit boards. The production of printed circuit boards involves the manufacture of pre-preg, plating, application of photo-resist polymer coating, chemical etching and stripping steps, solder masking, etc. The pollutants that are emitted are numerous, although most are emitted in very small amounts, and include criteria pollutants and HAPs. In total, EIT is a major source of HAPs and VOCs. The major sources of emission are the treater tower coaters.

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



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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 B96000 - THIS EMISSION UNIT CONSISTS OF THE FACILITY'S B/96 WASTE TREATMENT FACILITY, INCLUDING ALL OF ITS CHEMICAL TREATMENT SYSTEMS AND SUPPORT EQUIPMENT FOR BOTH SITE MANUFACTURING WASTE WATER SYSTEMS.

Emission unit B96000 is associated with the following emission points (EP):
96029, 9629B

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 ABATEMENT 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.

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 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, 25904, 25905

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: ICC is located at 1, Building 259 - PROCESS NAME: TREATER TOWER #1 USING A



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COATING THAT IS COMPLIANT WITH PART 228, AND DOES NOT HAVE AN A RATING PER 212. THIS PROCESS INVOLVES THE FABRICATION OF PREPREG IN A FABRIC COATING LINE. FOR PROCESS 1CC, THE SOLVENT SYSTEM DOES NOT CONTAIN MORE THAN 2.9 LBS OF VOC PER GALLON (MINUS WATER AND EXCLUDED VOC, SUCH AS ACETONE) OF COATING AT APPLICATION. MATERIAL THRUPUT IS NOT REGULATED FOR ANY MATERIALS INVOLVED IN THIS PROCESS. IF THRUPUT DATA IS REQUIRED FOR EMISSIONS ESTIMATING PURPOSES IT IS PROVIDED IN THE CALCULATION SECTION OF THE SUPPORTING DOCUMENTATION. ED IN THE CALCULATION SECTION OF THE SUPPORTING DOCUMENTATION.

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.

THE SOURCES ASSOCIATED WITH THIS PROCESS ARE SUBJECT TO EPA'S CAM RULE.

Process: 2CC is located at 1, Building 259 - PROCESS NAME: TREATER TOWER #2 USING A COATING THAT IS COMPLIANT WITH PART 228, AND DOES NOT HAVE AN A RATING PER 212. THIS PROCESS INVOLVES THE FABRICATION OF PREPREG IN A FABRIC COATING LINE. FOR PROCESS 2CC, THE SOLVENT SYSTEM DOES NOT CONTAIN MORE THAN 2.9 LBS OF VOC PER GALLON (MINUS WATER AND EXCLUDED VOC, SUCH AS ACETONE) OF COATING AT APPLICATION. MATERIAL THRUPUT IS NOT REGULATED FOR ANY MATERIALS INVOLVED IN THIS PROCESS. IF THRUPUT DATA IS REQUIRED FOR EMISSIONS ESTIMATING PURPOSES IT IS PROVIDED

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.

THE TREATER TOWER IS SUBJECT TO EPA'S CAM RULE.

Process: 2TO is located at Building 259 - B/259 TREATER TOWER #2 PRE-PREG MANUFACTURING PROCESS UTILIZING A HAZARDOUS AIR POLLUTANT AS THE SOLVENT, SUBJECT TO 40 CFR 63 SUBPART OOOO, FABRIC COATING.

Emission unit PWB001 - PWB001 consists of process equipment located in Buildings 18, 41, 47 and 53 that supports the manufacture of printed wiring boards (PWBs). These operations include surface preparation, lamination of copper foil, 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), finish operations, inspection, test, profile and stock.

Emission unit PWB001 is associated with the following emission points (EP):

18444, 18659, 18674, 18681, 18682, 18685, 18690, 18695, 41153, 41171, 41195, 47174, 47187, 47188, 47189, 47194, 47200, 47204, 47205, 47217, 47218, 47230, 47231, 47234, 47242, 47246

Process: A11 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



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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 ASSOICATED 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: 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: 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: 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).



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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: 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; 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: 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: BR1 is located at 2, Building 47 - PROCESS NAME: EMISSION POINT 18686 - EMISSION POINT 18686 EXHAUSTS A VARIETY OF EXEMPT, TRIVIAL, AND INSIGNIFICANT EMISSION SOURCES. THIS PROCESS APPLIES TO THE INSIGNIFICANT EMISSION SOURCES. ADDITIONAL INFORMATION ABOUT THIS PROCESS IS NOT REQUIRED IN THIS APPLICATION. THE SUPPORTING DOCUMENTATION PROVIDES MORE DETAILS ON THE BASIS FOR THE EMISSION ESTIMATE.

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

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.

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



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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: 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: 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: GX1 is located at Building 41 - Complex assembly operations in Building 41, including heller ovens, SRT rework tools, step ionograph and ovens.

Process: GZ1 is located at Building 41 - ICAS operations in building 41, including reflow ovens, bake ovens, ionography, plasma etch and wash tool.

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: JD1 is located at 2, Building 47 - B/18 Somar Resist Laminator. This process emits B rated pollutants at an emission rate potential less than 10 pounds per hour.

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: SE1 is located at Building 41 - SESE operations in Building 41, including resist strip operations, etch operations, solder strip operations, and associated fume scrubber, emission point ID 47204

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 ASSEMB - THIS EMISSION UNIT CONSISTS OF MANUFACTURING



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OPERATIONS IN B/46 THAT SUPPORT THE BACKPANEL ASSEMBLY OPERATIONS.

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

41004, 41175, 41192

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).

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 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, 25810

Process: AA1 is located at Building 258 - B/258 CUPRIC ETCH SUPPORT, LAMINATORS, LAMINATIONS PRESSES, 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: 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: AB1 is located at Building 258 - B/258 HYPER BGA CIRCUIT BOARD MANUFACTURING PROCESSES, INCLUDING ACID COPPER ELECTROPLATE, PRECLEAN, CUPRIC ETCH, ED RESIST DEVELOP, CHROME LINE, PHOTOLAB STRIPPER, PHOTOLAB DEVELOPER, SEEDER/FINELINE PROCESS AND WET LINE #1 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: AE1 is located at Building 258 - B/258 MANUFACTURING OPERATIONS INCLUDING CHROME ETCH OPERATIONS, PLASMA REACTOR, CUPRIC CHLORIDE ETCHER WITH



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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

Process: AE3 is located at Building 258 - Building 258 manufacturing operations. Non-scrubbed portions of process AE1, including cupric chloride etcher and interposer plating baths. The emission sources associated with this process emit B-rated pollutants at an emission rate potential less than 10 pounds/hr.

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.

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.

Title V/Major Source Status

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

The facility is a major source of VOC and HAP.

Program Applicability

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

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO



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NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
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.

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,



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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.

SIC Code

Description

3579
3672

OFFICE MACHINES, NEC
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.

SCC Code

Description

3-13-065-00

3-13-065-99

4-02-030-01

ELECTRICAL EQUIPMENT
ELECTRICAL EQUIPMENT - SEMICONDUCTOR
MANUFACTURING
INTEGRATED CIRCUIT MANUFACTURING - GENERAL
ELECTRICAL EQUIPMENT
ELECTRICAL EQUIPMENT - SEMICONDUCTOR
MANUFACTURING
SEMICONDUCTOR MFG-MISCELLANEOUS OPERATIONS-
GENERAL-SPECIFY MATERIAL
SURFACE COATING OPERATIONS
SURFACE COATING OPERATIONS - SEMICONDUCTORS
ORGANIC SOLVENT-SURFACE COATING-
SEMICONDUCTORS-SPECIFY SOLVENT

Facility Emissions Summary

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In the following table, the CAS No. or Chemical Abstract Service 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	Range
		lbs/yr	
0NY100-00-0	HAP		>= 50 tpy but < 100 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 250 tpy but < 75,000 tpy
0NY075-00-5	PM-10		>= 2.5 tpy but < 10 tpy
0NY998-00-0	VOC		>= 250 tpy but < 75,000 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 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



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applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 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 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: 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.

Item D: 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 E: 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 F: 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 G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 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.

Item H: Property Rights - 6 NYCRR 201-6.5(a)(6)

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

Item I: 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.



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Item J: 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 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 K: 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



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procedures as apply to initial permit issuance but shall 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 L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: 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

Location	Regulation	Condition	Short Description
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Facility/EU/EP/Process/ES

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FACILITY	ECL 19-0301	54		Powers and Duties of the Department with respect to air pollution control
B-25900/-/2TO	40CFR 63-0000.4290	1	-7	Fabric Coating, Printing, & Dyeing NESHAPEmission limits
B-25900/-/2TO	40CFR 63-0000.4292 (b)	44		Fabric Coating/Printing/Dyeing NESHAPEOperating Limits
B-25900/-/2TO	40CFR 63-0000.4293 (b)	45		Fabric Coating/Printing/Dyeing NESHAPEWork Practice Standards
B-25900/-/2TO	40CFR 63-0000.4311 (a)	46		Fabric Coating/Printing/Dyeing NESHAPEReporting
B-25900/-/2TO	40CFR 63-0000.4311 (c)	47		Fabric Coating/Printing/Dyeing NESHAPEReporting
B-25900	40CFR 63-0000.4341 (a)	1	-6	Fabric Coating/Printing/Dyeing NESHAPEEmission Rate with Add-On Controls - Initial Compliance Provisions
B-25900/-/2TO	40CFR 63-0000.4342	1	-8	Fabric Coating/Printing/Dyeing NESHAPEEmission Rate with Add-On Controls Option - Continuous Compliance Provisions
B-25900/-/2TO	40CFR 63-0000.4351	1	-9	Fabric Coating/Printing/Dyeing NESHAPEOverall Control Efficiency and Oxidizer Outlet Concentration
B-25900/-/2TO	40CFR 63-0000.4352	49		Fabric Coating/Printing/Dyeing NESHAPEOverall Control Efficiency and Oxidizer Outlet Concentration Option-Cont. Compliance
B-25900/-/2TO	40CFR 63-0000.4360	1	-10	Fabric Coating/Printing/Dyeing NESHAPEGeneral Requirements for Performance Testing
B-25900/-/2TO	40CFR 63-0000.4361	51		Emission Capture System Efficiency
B-25900/-/2TO	40CFR 63-0000.4364	52		Requirements for CPMS installation, operation and maintenance
FACILITY	40CFR 68	21		Chemical accident



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FACILITY	40CFR 82-F	22	prevention provisions Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10, 23	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	55, 1 -11	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	24, 35, 36	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	15	General conditions
FACILITY	6NYCRR 201-6.5(a)(7)	2, 1 -1	General conditions Fees
FACILITY	6NYCRR 201-6.5(a)(8)	16	General conditions
B-25900/-/1NC	6NYCRR 201-6.5(b)(1)	41	General conditions
B-25900/-/2NC	6NYCRR 201-6.5(b)(1)	42	General conditions
FACILITY	6NYCRR 201-6.5(c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201- 6.5(c)(3)(ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d)(5)	17	Compliance schedules
FACILITY	6NYCRR 201-6.5(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.5(f)	25	Operational flexibility
FACILITY	6NYCRR 201-6.5(f)(6)	18	Off Permit Changes
FACILITY	6NYCRR 202-1.1	19, 1 -3	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	1 -4	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	56, 1 -12	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 211.3	20	General Prohibitions - visible emissions

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A-SSEMB	6NYCRR 212.10 (c) (4) (i)	37	limited NOx and VOC RACT required at major facilities
B-96000	6NYCRR 212.10 (c) (4) (i)	53	NOx and VOC RACT required at major facilities
FACILITY	6NYCRR 212.4 (a)	26, 27, 28, 57, 58	General Process Emission Sources - emissions from new sources and/or modifications
FACILITY	6NYCRR 212.4 (c)	29	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.6 (a)	30	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215	9	Open Fires
FACILITY	6NYCRR 215.2	1 -2	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2 (a) (2)	31, 59	Sulfur in Fuel Limitations Post 12/31/87.
FACILITY	6NYCRR 226.2	32	General Requirments
B-25900	6NYCRR 228-1.10	40	Handling, storage and disposal of VOCs
FACILITY	6NYCRR 228-1.3	1 -5	VOC emission control requirements
B-25900	6NYCRR 228-1.5	38	Reports, recordkeeping, sampling and analysis
B-25900	6NYCRR 228-1.5 (g)	39	continuous monitoring of air cleaning device
FACILITY	6NYCRR 229.3 (e) (2) (v)	34	Volatile organic liquid storage tanks

Applicability Discussion:

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

ECL 19-0301

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.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 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

6 NYCRR 201-1.4



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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.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to 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.

6 NYCRR Subpart 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 determine the compliance status of the facility.

6 NYCRR 201-6.5 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.5 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.5 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.



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6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 201-6.5 (d) (5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 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.

6 NYCRR 201-6.5 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1

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

6 NYCRR 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.



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6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR Part 215

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

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.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

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

40 CFR 63.4290

The facility must comply with the emission limits in Table 1 to 40 CFR Part 63, Subpart OOOO.

40 CFR 63.4292 (b)

The facility owner or operator must meet the operating requirements of 40 CFR Part 63, Subpart OOOO, Table 2.

40 CFR 63.4293 (b)

The facility must develop and implement a work practice plan to minimize fugitive HAP emissions from coating operations.

40 CFR 63.4311 (a)

The facility must submit semi-annual reports containing the information in items 40 CFR 63.4311(a).

40 CFR 63.4311 (c)

The owner must submit reports of startup, shutdown and/or malfunctions.

40 CFR 63.4341 (a)

The permit specifies how the owner is to make its initial compliance determination when using the



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emission rate (with add-on control) compliance option.

40 CFR 63.4342

The permit directs the owner how to demonstrate compliance with the organic HAP emission limit.

40 CFR 63.4351

40 CFR 63.4351 describes what must be done to initially document compliance.

40 CFR 63.4352

40 CFR 63.4352 explains how to demonstrate continuous compliance.

40 CFR 63.4360

40 CFR 63.4360 specifies the stack testing requirements.

40 CFR 63.4361

40 CFR 63.4361 specifies procedures for capture system monitoring.

40 CFR 63.4364

40 CFR 63.4364 describes what QA must be performed for each continuous parameter monitoring system.

6 NYCRR 201-6.5 (b) (1)

This condition implements the EPA's Compliance Assurance Monitoring rule.

6 NYCRR 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.

6 NYCRR 211.1

This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

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

VOC removal efficiency greater than 81% is considered RACT.

6 NYCRR 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.

6 NYCRR 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 an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6 NYCRR 212.6 (a)



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

6 NYCRR 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.

6 NYCRR 226.2

General requirements for degreasing operations.

6 NYCRR 228-1.10

This citation specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

6 NYCRR 228-1.3

This provision establishes emission control requirements for sources of VOC. At EIT, the treater towers are subject to the surface coating rule and must achieve at least 80% overall control efficiency.

6 NYCRR 228-1.5

Recordkeeping requirements for surface coaters.

6 NYCRR 228-1.5 (g)

The facility is required to monitor the temperature of each oxidizer chamber.

6 NYCRR 229.3 (e) (2) (v)

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

Compliance Certification

Summary of monitoring activities at ENDICOTT INTERCONNECT TECHNOLOGIES INC:

Location	Cond No.	Type of Monitoring
Facility/EU/EP/Process/ES		

B-25900/-/2TO	1-7	record keeping/maintenance procedures
B-25900/-/2TO	44	monitoring of process or control device parameters as surrogate
B-25900/-/2TO	45	record keeping/maintenance procedures
B-25900/-/2TO	46	record keeping/maintenance procedures
B-25900/-/2TO	47	record keeping/maintenance procedures
B-25900	1-6	intermittent emission testing
B-25900/-/2TO	1-8	record keeping/maintenance procedures
B-25900/-/2TO	1-9	intermittent emission testing
B-25900/-/2TO	49	record keeping/maintenance procedures
B-25900/-/2TO	1-10	intermittent emission testing
B-25900/-/2TO	51	monitoring of process or control device parameters as surrogate
B-25900/-/2TO	52	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures

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B-25900/-/1NC	41	monitoring of process or control device parameters as surrogate
B-25900/-/2NC	42	monitoring of process or control device parameters as surrogate
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	25	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
A-SSEMB	37	intermittent emission testing
B-96000	53	intermittent emission testing
FACILITY	26	record keeping/maintenance procedures
FACILITY	27	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
FACILITY	57	record keeping/maintenance procedures
FACILITY	58	record keeping/maintenance procedures
FACILITY	29	monitoring of process or control device parameters as surrogate
FACILITY	30	monitoring of process or control device parameters as surrogate
FACILITY	31	monitoring of process or control device parameters as surrogate
FACILITY	59	monitoring of process or control device parameters as surrogate
FACILITY	32	record keeping/maintenance procedures
B-25900	40	record keeping/maintenance procedures
FACILITY	1-5	intermittent emission testing
B-25900	38	record keeping/maintenance procedures
B-25900	39	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures

Basis for Monitoring

EIT is required to monitor several parameters at this facility. For example, EIT is required to monitor emission control parameters pursuant to an operation and maintenance manual. The parameters to be monitored depend on the type of device and pollutant to be scrubbed. For the thermal oxidizers, EIT is required to monitor oxidizer temperature. For fabric filters, EIT is required to monitor pressure drop. For carbon adsorption, EIT is required to monitor HC outlet concentration. For wet scrubbers, EIT is required to monitor pH or gallons per minute, scrubber flow.