

ALPHA Metal Reclamation Services

Pre - Audit Package



macdermidalpha.com
October, 2019

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BACKGROUND INFORMATION

alpha



ALPHA Reclamation Services Brochure

Maximize Your Metal Recovery Return



macdermidalpha.com

September, 2019

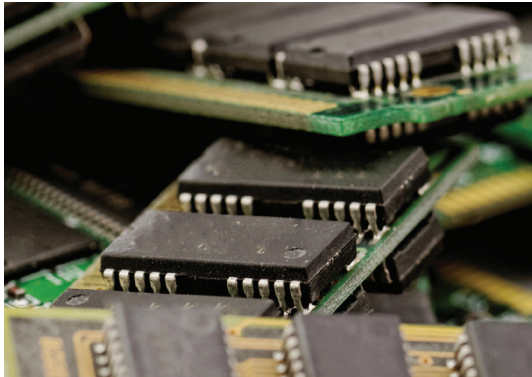
ASSEMBLY SOLUTIONS

ALPHA Metal Reclamation Services

Leading Solder Manufacturer & Recycler in North America

Alpha, a brand of MacDermid Alpha Electronics Solutions, is the largest soldering materials provider in North America with in-house solder paste and reclaim capability. Our publicly held corporation offers stability and the highest financial return to our recycling customers. We have an experienced staff dedicated to reclamation efforts who maximize the amount of metal processed from your reclaim material. Our processes also remove the reclaim material from becoming part of the waste stream traditionally placed in landfills.

In addition to providing tough, sealable metal recycling pails and drums, Alpha guarantees that all shipments are lot traceable and provides audit trails to help document the safe environmental reprocessing of waste material. We welcome customers to visit our facility in Altoona, Pennsylvania to conduct your own audit of our recycling process.



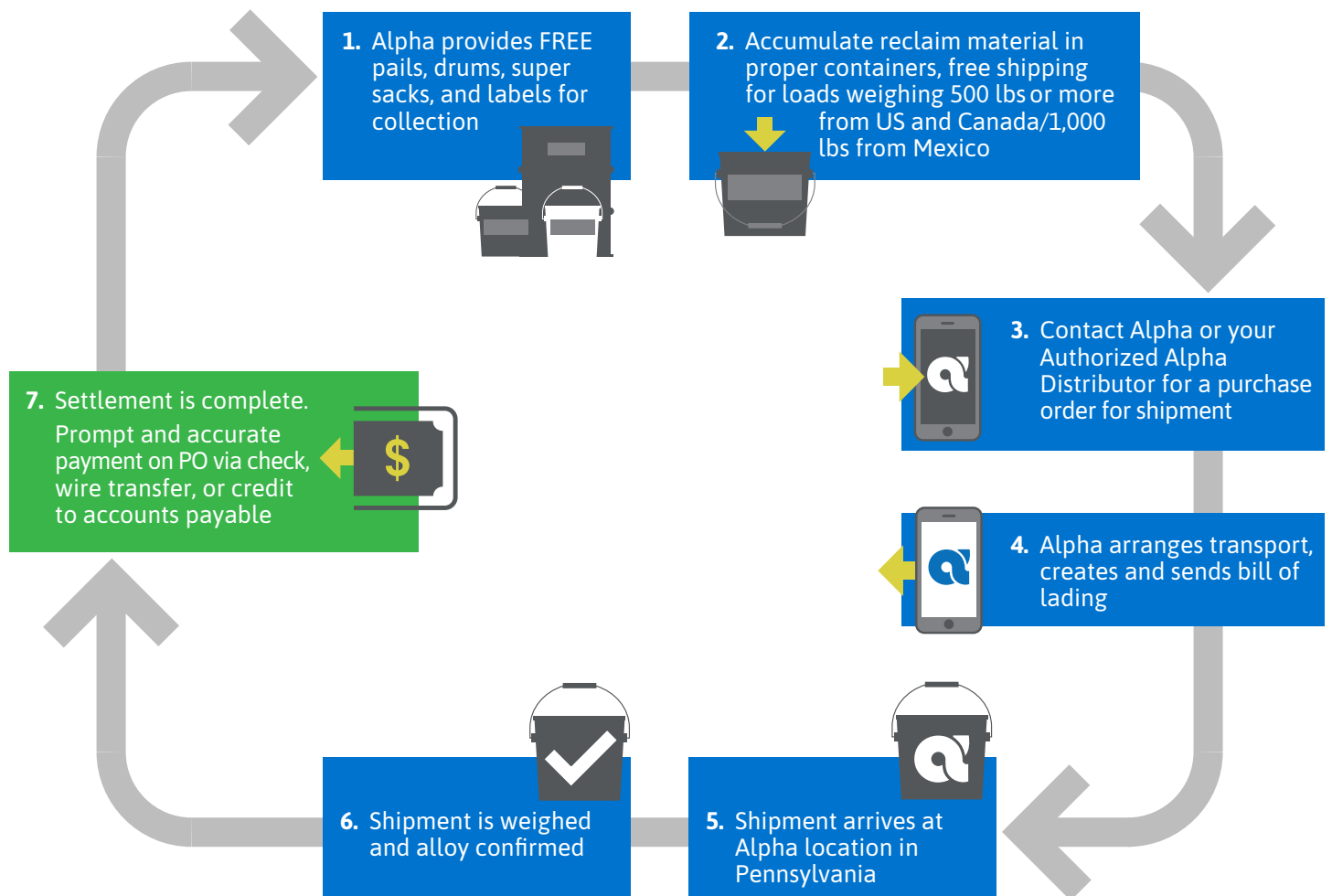
ALPHA Metal Reclamation Services

Benefit From Our Experience



Alpha is the largest solder manufacturer and recycler in North America. Below is a simple guide to assist you through the collection, shipping, and payment processes.

PROCESS FLOW SUMMARY



ALPHA Metal Reclamation Services

Benefit From Our Experience



TYPES OF RECLAIM MATERIAL TO SHIP TO ALPHA

- Unused and expired solder paste, scrap, partially filled jars
- Used cartridges, syringes, gloves, wipes
- Pot dump from wave and selective soldering machines
- Dross from wave soldering
- Populated scrap boards

	Super Sack	2.5 Gallon Collection Pails	Gaylord	55 Gallon Drum
				
Unused or expired solder paste, scrap		✓		✓
Jars, cartridges, syringes, gloves, wipes	✓		✓	✓
Pot dump		✓		✓
Dross		✓		✓
Scrap boards (populated separated from unpopulated)	✓		✓	✓
Cast ingots				✓

ALPHA Metal Reclamation Services

An Easy Step-by-Step Process

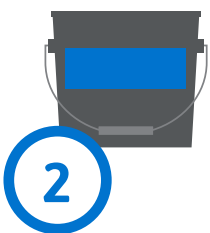


COLLECTION TIPS



- Collect minimum quantity of material to qualify for free freight. 500 lbs from US and Canada/ 1,000 lbs from Mexico.
- Every container or package must have a cover and a label.
- Paste should be scraped directly into collection pail.
- Empty jars, syringes, cartridges, cassettes, gloves, and wipes should be collected in a geylord, super sack or drum.
- If possible, containers should be palletized and shrink wrapped. When shipping drums, 4 drums per pallet. Wooden pallets shipped to our Pennsylvania facility from Mexico or Canada must include the correct ISPM 15 stamp or shipment will be rejected. Metal and plastic pallets do not require ISPM 15 identification.
- Items NOT accepted include electronics in their original housings (monitors, laptops, phones), any material in liquid form and paste flux containing no metal.

LABELING PROCEDURES



Shipping labels will be provided for all shipments and container types. Labels will correspond to the contents of the container – tin-lead/hazardous and lead-free/non-hazardous wastes. All shipments require a PO# to be included on the label. Alpha's reclaim staff will assign the PO# for your shipment.

- Important to use proper label for type of reclaim material.
- Important to put PO# on each label (prevents delays upon receiving and payment).

alpha®
Pb-Bearing ☐ Solder Paste ☐ Paste Debris ☐ Oxides ☐ Metal Shavings

DANGER

From: _____

To: Alpha Recycling
4100 Sixth Avenue
Altoona, PA 16602
Attn: Receiving Dept.

Container No. _____ Gross Wt. _____

Item _____ Net Wt. _____

PO Number _____

Tin-lead label (blue ink)

alpha®
Pb-Free ☐ Solder Paste ☐ Paste Debris ☐ Oxides ☐ Metal Shavings

From: _____

To: Alpha Recycling
4100 Sixth Avenue
Altoona, PA 16602
Attn: Receiving Dept.

Container No. _____ Gross Wt. _____

Item _____ Net Wt. _____

PO Number _____

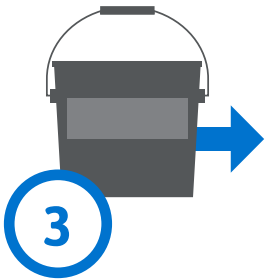
Lead-free label (green ink)

ALPHA Metal Reclamation Services

Shipping & Payment



SHIPPING PROCEDURES



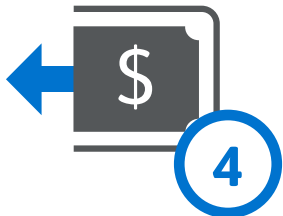
Alpha's Reclaim Team assists with arranging transportation and provides customers with all required shipment documentation.

Once details of shipment are settled, Alpha will arrange transportation and email the required bills of lading and any additional documents that may be required for your shipment. Customers coordinate pick up appointments with the designated carrier.

Alpha will pay the freight on all shipments over 500 lbs from US and Canada/ 1,000 lbs from Mexico.


Shipments from California and Mexico must be manifested. Alpha coordinates with transportation service provider to complete all necessary documents, including manifests, if required.

PAYMENT

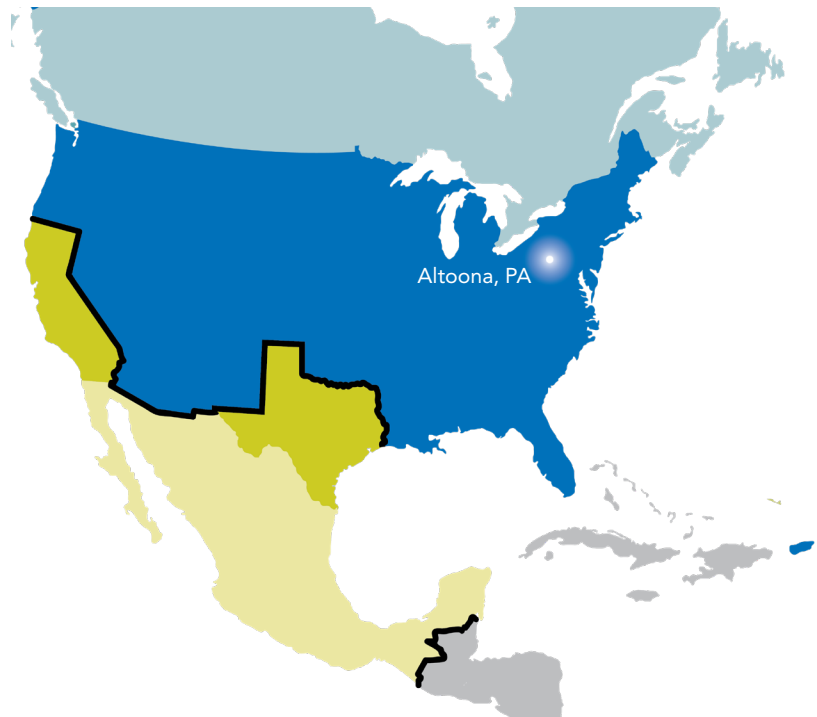


Alpha's automated receiving process allows for prompt and accurate settlement once materials are received at the reclamation facility in Altoona, Pennsylvania.

Customers may receive payment by check, wire, or as a credit to accounts payable.

 **Canada and USA (except California and Texas):** no manifest required

 **Mexico, California and Texas:** manifest required



ALPHA Metal Reclamation Services

FAQs



FAQs

Q: Can I ship liquids?

A: No liquids of any kind are accepted.

Q: Can I send paste flux?

A: No. There is no metal to recycle in paste flux.

Q: Is dross a hazardous waste?

A: No. It is considered a by-product of the wave soldering process, except in Mexico and California.

Q: Is paste scrap or paste debris hazardous waste?

A: No. It is considered an unused commercial chemical product, except Mexico and California.

Q: How is pricing established?

A: Pricing is based on the London Metals Exchange (LME) metals price on the day the PO is issued. For larger shipments, the price can be set the day after processing is witnessed.

Q: How do I check the price of metals?

A: You can check daily at kitco.com

Q: What trucking company will be used?

A: Alpha will select the carrier; customer makes arrangements at their convenience for pick-up.

Q: Is Alpha licensed to export Nationalized Reclaim Material to the US from Mexico?

A: Yes. Alpha has been issued license #0001770 to export nationalized solder reclaim material from SEMARNAT (Secretaría de Medio Ambiente y Recursos Naturales).

For additional questions,

contact your local Reclaim Specialist at recycle@macdermidalpha.com.

ALPHA Metal Reclamation Services

Contacts



alphaassembly.com/Markets/Recycling-Services
recycle@macdermidalpha.com

RECLAIM COORDINATOR US/CANADA

Mary Kay Summerville

4100 6th Avenue
Altoona, PA 16602

Tel: 800-289-3797

Tel: 814-940-3819

Fax: 814-940-6752

MaryKay.Summerville@macdermidalpha.com

MIDWEST & SOUTHEAST US

Harold Sneath

Mob: 224-213-3256

Harold.Sneath@macdermidalpha.com

WESTERN US & WESTERN CANADA

Patricia Mealey

Tel: 800-742-1074

Mob: 714-742-1074

Patricia.Mealey@macdermidalpha.com

NORTHEAST US & EASTERN CANADA

Jack Wagner

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Mob: 908-205-3473

Jack.Wagner@macdermidalpha.com

BRAZIL

Luciana Liborio Abraham

Materials Supervisor

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Distrito Industrial – Manaus – Am – Brasil

Tel: 55 92 3614-7441

Tel: 55 92 8126-0008

Luciana.Liborio@macdermidalpha.com

RECLAIM COORDINATOR MEXICO

Chantal Osorio

Av Nafta No 800 Parque Industrial STIVA
Aeropuerto Apodaca NL Mexico

Tel: 52 4170 3561 Ext. 816647

Mob: (044) 8120221563

Jessica.Osorio@macdermidalpha.com

EASTERN MEXICO

Tereso Contreras

National Mexico Reclaim Manager
Av. Nafta No.800, Parque Industrial STIVA
Aeropuerto, Apodaca NL México 66600

Tel: 52 1(81) 4170-7469

Mob: 52 (181) 1412-9207

Tereso.Contreras@macdermidalpha.com

WESTERN MEXICO

Daniel Galaviz

Regional Mexico Reclaim Manager
Av. Nafta No.800, Parque Industrial STIVA
Aeropuerto, Apodaca N.L. México 66600

Tel: 52 1(81) 4170-7469

Mob: 52 (81) 1411 3547

Daniel.Galaviz@macdermidalpha.com



macdermidalpha.com
September, 2019

alpha 

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF AMENDMENT OF "ALPHA METALS, INC.", CHANGING ITS NAME FROM "ALPHA METALS, INC." TO "ALPHA ASSEMBLY SOLUTIONS INC.", FILED IN THIS OFFICE ON THE TWENTY-EIGHTH DAY OF SEPTEMBER, A.D. 2016, AT 3:22 O`CLOCK P.M.

AND I DO HEREBY FURTHER CERTIFY THAT THE EFFECTIVE DATE OF THE AFORESAID CERTIFICATE OF AMENDMENT IS THE FIRST DAY OF OCTOBER, A.D. 2016 AT 3:22 O'CLOCK P.M.

A FILED COPY OF THIS CERTIFICATE HAS BEEN FORWARDED TO THE NEW CASTLE COUNTY RECORDER OF DEEDS.



A handwritten signature of Jeffrey W. Bullock in black ink, written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed.

876949 8100
SR# 20165982347

Authentication: 203106961
Date: 10-04-16

You may verify this certificate online at corp.delaware.gov/authver.shtml

State of Delaware
Secretary of State
Division of Corporations
Delivered 03:22 PM 09/28/2016
FILED 03:22 PM 09/28/2016
SR 20165982347 - File Number 876949

**CERTIFICATE OF AMENDMENT
OF
CERTIFICATE OF INCORPORATION
OF
ALPHA METALS, INC.**

Pursuant to Section 242 of the General Corporation Law of the State of Delaware (the "GCL"), Alpha Metals, Inc., a corporation organized and existing under the GCL (the "Corporation") does hereby certify that:

1. The Certificate of Incorporation of the Corporation is hereby amended as follows:

Article FIRST of the Certificate of Incorporation is deleted in its entirety and replaced with the following:

"The name of the corporation is Alpha Assembly Solutions Inc. (the "Corporation")."

2. The foregoing amendment to the Corporation's Certificate of Incorporation was duly adopted in accordance with the provisions of Section 242 of the GCL.

3. The foregoing amendment to the Corporation's Certificate of Amendment shall be effective as of October 1, 2016.

IN WITNESS WHEREOF, the Corporation has caused this Certificate to be executed by its duly authorized officer as of the 28th day of September, 2016.

ALPHA METALS, INC.

By: 

Frank J. Monteiro
Vice President



GLOBAL ENVIRONMENTAL, HEALTH & SAFETY POLICY

Element Solutions is committed to producing products and providing services to customers in a safe, responsible manner that respects the health and safety of its employees, the environment, its customers, its shareholders, other interested parties and the communities in which it operates. Our guiding principles for all our businesses are:

PROVIDE a safe and healthy work environment and ensure that personnel are trained, informed and motivated to act safely and with respect to the environment.

ASSESS aspects and impacts of our activities and materials carefully and take into consideration human health and the environment by integrating principles of risk control, engineering, pollution prevention, waste reduction and energy efficiency in order to minimize the environmental impact of our businesses and to provide environmentally responsible stewardship of our products throughout their life cycles.

COMMITTED to designing and implementing Environment, Health, Safety (EHS) systems to minimize risk, identify opportunities and produce a safe work environment as well as to generating sustainable solutions for prevention of pollution, protection of the environment and prevention of accidents.

PARTICIPATE and consult with our employees regarding EHS activities and engage in open communication with authorities, organizations and the public.

MEET OR EXCEED applicable EHS laws, and related legal requirements in the countries where we operate.

ALLOCATE necessary resources to fulfill our strategies, training and programs that bring value and awareness to the entire organization.

ENSURE that every employee has a personal and collective responsibility to maintain a healthy and secure workplace, promote safe working practices, and actively participate in reporting unsafe conditions/ acts to reduce risk.

ENCOURAGE suppliers, distributors, and customers to incorporate EHS principles in managing their businesses.

CONTINUOUSLY IMPROVE our EHS performance, management systems and set EHS objectives in line with the strategic direction of Element Solutions businesses by utilizing continuous improvement methodologies to reduce variability in our businesses / manufacturing processes.

Element Solutions considers EHS and Sustainability to be a Core Value and a key management responsibility to lead by example as well as the responsibility of every employee, essential to its corporate citizenship and business success.

Benjamin Gliklich
Chief Executive Officer
Element Solutions Inc

Scot R. Benson
President & Chief Operating Officer
Element Solutions Inc

Issue Date: 09 MAY 2019



ENVIRONMENTAL PRE-AUDIT INFORMATION

Certificate of Approval

This is to certify that the Management System of:

Alpha Assembly Solutions, Inc. A MacDermid Performance Solutions Company

4100 Sixth Avenue, Altoona, PA, 16602, United States

has been approved by LRQA to the following standards:

ISO 14001:2015 | OHSAS 18001:2007



Chris Koci - President, LRQA Americas

Issued By: Lloyd's Register Quality Assurance, Inc.

for and on behalf of: Lloyd's Register Quality Assurance Limited

Current Issue Date: 3 January 2018
Expiry Date: 4 December 2019
Certificate Identity Number: 10081051

Original Approvals:
ISO 14001 – 27 October 2017
OHSAS 18001 – 3 January 2018

Approval Number(s): ISO 14001 – 00011164 / OHSAS 18001 – 00011907

The scope of this approval is applicable to:
Manufacture of Solder Alloy Products for the Electronics Industry and Industrial Applications. Recycling of
Solder Materials.



001

Certificate of Approval

This is to certify that the Management System of:

Alpha Assembly Solutions, Inc. A MacDermid Performance Solutions Company

4100 Sixth Avenue, Altoona, PA, 16602, United States

has been approved by LRQA to the following standards:

ISO 9001:2015



Chris Koci - Business Director - Certification

Issued by: Lloyd's Register Quality Assurance, Inc.

Current issue date: 6 July 2018

Expiry date: 5 July 2021

Certificate identity number: 10104511

Original approval(s):

ISO 9001 – 31 March 2018

Approval number(s): ISO 9001 – 0078022

The scope of this approval is applicable to:

Manufacture of Solder Alloy Products for the Electronics Industry and Industrial Applications. Recycling of Solder Materials.





SCOPE OF ACCREDITATION TO ISO/IEC 17025:2005

ALPHA ASSEMBLY SOLUTIONS
 4100 Sixth Avenue
 Altoona, PA 16602
 Lee Ann Olsick Phone: 814 940 6726
LeeAnn.Olsick@AlphaAssembly.com

CHEMICAL

Valid To: February 29, 2020

Certificate Number: 2787.01

In recognition of the successful completion of the A2LA evaluation process, accreditation is granted to this laboratory to perform the following tests on solders.

<u>Test Description</u>	<u>Test Method</u>
Titration	
Tin Content	WI-01218
Silver Content	WI-01225
Spectroscopy	
Optical Emission Spectroscopy (OES) Ag, Al, As, Au, Bi, Cd, Cu, Fe, Ge, Hg, In, Ni, P, Pb, S, Sb, Sn, Zn	WI-01231
Wavelength Dispersive X-Ray Fluorescence Spectroscopy (XRF) Ag, Al, As, Au, Bi, Cd, Cu, Fe, In, Ni, P, Pb, S, Sb, Sn, Zn	WI-01233
Inductively Coupled Plasma Spectroscopy (ICP) Ag, Al, As, Au, Bi, Cd, Cu, Fe, Ge, Hg, In, Na, Ni, P, Pb, S, Sb, Sn, Zn	WI-01232
Gravimetric Density	
Tin Content	WI-01239



Accredited Laboratory

A2LA has accredited

ALPHA ASSEMBLY SOLUTIONS

Altoona, PA

for technical competence in the field of

Chemical Testing

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005 *General requirements for the competence of testing and calibration laboratories*. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communiqué dated April 2017).



Presented this 28th day of May 2018

A stylized handwritten signature in black ink, positioned above a horizontal line.

President and CEO
For the Accreditation Council
Certificate Number 2787.01
Valid to February 29, 2020

For the tests to which this accreditation applies, please refer to the laboratory's Chemical Scope of Accreditation.



United States Department of State

*Bureau of Political-Military Affairs
Directorate of Defense Trade Controls
Washington, D.C. 20522-0112*

August 14, 2019

Victor J. Michels, Vice President
Alent USA Holding, Inc.
245 Freight Street
Waterbury, CT 06702
PAUL.ROBINSON@ALPHAASSEMBLY.COM

REGISTRANT CODE: M32873
EXPIRATION DATE: 07/31/2020

Reference: Manufacturer Registration Statement and Fee Submission

Dear Mr. Michels:

The Office of Defense Trade Controls Compliance received your registration statement and fee to register as a manufacturer. We have reviewed your registration statement and your registration code is M32873, which expires on 07/31/2020.

Any person who engages in the United States in the business of either manufacturing or exporting defense articles or furnishing defense services is required to register and keep that registration current with this office pursuant to the Arms Export Control Act (AECA) and the International Traffic in Arms Regulations (ITAR Part 122). Registration serves as a precondition to submitting an application for an export license or other approval from the Directorate of Defense Trade Controls (DDTC), or to use export exemptions. This registration does not satisfy the requirements for registering as a broker pursuant to ITAR Part 129.

As you are the senior officer empowered to sign the registration statement, we ask you to maintain records consistent with ITAR Section 122.5 regarding: 1) The key senior officer listed on the registration who will oversee the compliance program and be responsible for designating the direct employees who will serve as "empowered officials" at their place of employment, and 2) A list of qualified, direct employees who will serve as "empowered officials" by name, position, business unit, phone and fax numbers and email addresses. Please note that third parties (individuals who are not direct employees, such as consultants, subcontractors or outside counsel, for example) cannot serve as "empowered officials."

ITAR Section 122.5 requires you to maintain records concerning your registration and the manufacture, acquisition and disposition of defense articles; the provision of defense services; and information on political contributions, fees, or commissions furnished or obtained, as required by ITAR Part 130. Records maintained shall be available at all times for inspection and copying by this office or by Customs officials. To maintain such records, managers,

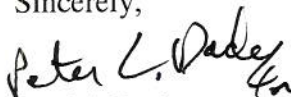
supervisors and employees need appropriate training on AECA and ITAR requirements and must understand the individual and organizational ramifications of failure to comply. Ramifications may include shipment delay and/or shipment seizure by Customs and Border Protection, loss of export privileges, or criminal charges.

You may refer to the DDTC website for a Compliance Guide at <http://www.pmddtc.state.gov/> and then click on the Compliance tab. The DDTC website also includes a copy of the ITAR, explanations of export licensing procedures, how to submit a license application, country sanctions, individuals/companies debarred by the Department of State, and other export matters. The website also includes procedures for requesting a commodity jurisdiction determination (ITAR Section 120.4) should you have questions on whether an article, services, or technical data is covered by the ITAR Part 121 (U.S. Munitions List).

Please include your registration code and the following statement on all registration correspondence to this office: "Under penalty according to federal law (22 CFR 127.2; 22 USC 2778; 18 USC 1001) I, [insert your name], as authorized by [name of company, if applicable] warrant the truth of the statements made herein." We recommend submitting for registration renewal well in advance to ensure this office receives the request up to 45 day before registration expiration. Your registration must be received at least 30 days before the expiration date. Registration must be current to apply for export licenses or other approvals, or to use export exemptions. Your registration is not current, for example, if you have not notified this office of any material change in the information contained in your Registration Statement (ITAR Section 122.4).

If you have any questions regarding registration, please contact us at (202) 663-1282 or DDTCResponseTeam@state.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter L. Dadey" with a stylized flourish at the end.

Daniel Cook

Chief, Registration Compliance & Analysis (RCA)

Certificate of Destruction



ISO 14001 CERTIFIED

The material described below was processed by Alpha Assembly Solutions, Altoona, PA plant for the recycling of metal by-products, precious metals, and other recyclables. ITAR (International Traffic in Arms Regulations) Policy Certified. Alpha's policy is to operate in a manner which is consistent with the requirements of the Arms Export Control Act (AECA) and the International Traffic in Arms (ITAR) of the United States Government, administered by the Directorate of Defense Trade Controls (DDTC).

Purchase Order Number:

Date Received:

Weight Received

Recycled Material Type:

Destruction Method

BOARDS/COMPONENTS

Shredding, Melting & Destruction

Name of Supplier:

Address:

Issued on: _____

Alpha Assembly Solutions
4100 6th Avenue, Altoona, PA



America's Reclaim Department

Certificate of Recycling



ISO 14001 CERTIFIED

The material described below was processed by Alpha Assembly Solutions, Altoona, PA plant for the recycling of metal by-products, precious metals, and other recyclables.

Purchase Order Number:

Date Received:

Weight Received

Recycled Material Type:

Method of Reclamation: **HIGH TEMPERATURE METAL RECOVERY**

Name of Supplier:

Address:

Issued on:



Alpha Assembly Solutions
4100 6th Avenue, Altoona, PA

America's Reclaim Department

UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION



**HAZARDOUS MATERIALS
CERTIFICATE OF REGISTRATION
FOR REGISTRATION YEAR(S) 2019-2020**

Registrant: ALPHA ASSEMBLY SOLUTIONS, A MACDERMID PERFORMANCE SOLUTION BUSINE
ATTN: Paul Robinson
4100 6TH AVE
ALTOONA, PA 16602

This certifies that the registrant is registered with the U.S. Department of Transportation as required by 49 CFR Part 107, Subpart G.

This certificate is issued under the authority of 49 U.S.C. 5108. It is unlawful to alter or falsify this document.

Reg. No: 060819600018B Effective: July 1, 2019 Expires: June 30, 2020

HM Company ID: 56415

Record Keeping Requirements for the Registration Program

The following must be maintained at the principal place of business for a period of three years from the date of issuance of this Certificate of Registration:

- (1) A copy of the registration statement filed with PHMSA; and
- (2) This Certificate of Registration

Each person subject to the registration requirement must furnish that person's Certificate of Registration (or a copy) and all other records and information pertaining to the information contained in the registration statement to an authorized representative or special agent of the U. S. Department of Transportation upon request.

Each motor carrier (private or for-hire) and each vessel operator subject to the registration requirement must keep a copy of the current Certificate of Registration or another document bearing the registration number identified as the "U.S. DOT Hazmat Reg. No." in each truck and truck tractor or vessel (trailers and semi-trailers not included) used to transport hazardous materials subject to the registration requirement. The Certificate of Registration or document bearing the registration number must be made available, upon request, to enforcement personnel.

For information, contact the Hazardous Materials Registration Manager, PHH-52, Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, 1200 New Jersey Avenue, SE, Washington, DC 20590, telephone (202) 366-4109.



CERTIFICATE OF LIABILITY INSURANCE

 DATE(MM/DD/YYYY)
04/26/2019

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Aon Risk Insurance Services West, Inc. Denver CO Office 1900 16th Street, Suite 1000 Denver CO 80202 USA	CONTACT NAME: PHONE (A/C. No. Ext): (303) 758-7688 FAX (A/C. No.): (303) 758-9458 E-MAIL ADDRESS: <table border="1"> <tr> <th>INSURER(S) AFFORDING COVERAGE</th> <th>NAIC #</th> </tr> <tr> <td>INSURER A: National Union Fire Ins Co of Pittsburgh</td> <td>19445</td> </tr> <tr> <td>INSURER B: New Hampshire Insurance Company</td> <td>23841</td> </tr> <tr> <td>INSURER C: American Home Assurance Co.</td> <td>19380</td> </tr> <tr> <td>INSURER D: Illinois National Insurance Co</td> <td>23817</td> </tr> <tr> <td>INSURER E: Ironshore Specialty Insurance Company</td> <td>25445</td> </tr> <tr> <td>INSURER F:</td> <td></td> </tr> </table>	INSURER(S) AFFORDING COVERAGE	NAIC #	INSURER A: National Union Fire Ins Co of Pittsburgh	19445	INSURER B: New Hampshire Insurance Company	23841	INSURER C: American Home Assurance Co.	19380	INSURER D: Illinois National Insurance Co	23817	INSURER E: Ironshore Specialty Insurance Company	25445	INSURER F:	
INSURER(S) AFFORDING COVERAGE	NAIC #														
INSURER A: National Union Fire Ins Co of Pittsburgh	19445														
INSURER B: New Hampshire Insurance Company	23841														
INSURER C: American Home Assurance Co.	19380														
INSURER D: Illinois National Insurance Co	23817														
INSURER E: Ironshore Specialty Insurance Company	25445														
INSURER F:															
INSURED Alpha Assembly Solutions 245 Freight Street Waterbury CT 06702 USA															

COVERAGES
CERTIFICATE NUMBER: 570076031297

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS. **Limits shown are as requested**

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
E	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PROJECT <input type="checkbox"/> LOC OTHER:			004037700	04/30/2019	04/30/2020	EACH OCCURRENCE \$1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$500,000 MED EXP (Any one person) \$25,000 PERSONAL & ADV INJURY \$1,000,000 GENERAL AGGREGATE \$2,000,000 PRODUCTS - COMP/OP AGG \$2,000,000
A	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> NON-OWNED AUTOS ONLY			CA 7269877 Business Auto (AOS)	04/30/2019	04/30/2020	COMBINED SINGLE LIMIT (Ea accident) \$1,000,000 BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE (Per accident)
E	<input type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR <input checked="" type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> DED <input type="checkbox"/> RETENTION			004037800	04/30/2019	04/30/2020	EACH OCCURRENCE \$10,000,000 AGGREGATE \$10,000,000
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR / PARTNER / EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) <input type="checkbox"/> Y <input checked="" type="checkbox"/> N If yes, describe under DESCRIPTION OF OPERATIONS below			WC031132379 WC (AOS) WC031132377 CA	04/30/2019	04/30/2020	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTHER E.L. EACH ACCIDENT \$1,000,000 E.L. DISEASE-EA EMPLOYEE \$1,000,000 E.L. DISEASE-POLICY LIMIT \$1,000,000
C					04/30/2019	04/30/2020	

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)
Evidence of Insurance.

CERTIFICATE HOLDER
CANCELLATION

Pennsylvania Department of Environmental Protection Resources South Central Region 1 Ararat Bldg. Harrisburg PA 17110 USA	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS. AUTHORIZED REPRESENTATIVE
--	--

Holder Identifier :

Certificate No : 570076031297



January 18, 2018

Mr. Jack Wagner
Alpha Assembly Solutions
4100 6th Avenue
Altoona, PA 16602

Re: Regulatory Interpretation of Solder Dross, Mixed Lead Scrap Metal and Solder Paste

Dear Mr. Wagner:

This letter is in response to Alpha Assembly Solutions (Alpha) November 28, 2017 request for a regulatory interpretation of solder dross, mixed lead scrap metal and solder paste in the context of the Resource Conservation and Recovery Act. This communication references the Department's previous correspondence of September 19, 2017 and Alpha's inquiry of September 13, 2017. The purpose of this correspondence is to reaffirm a previous letter of regulatory interpretation provided by the Department to then Fry Communications dated November 16, 1999.

Solder dross generally refers to oxidized solder residues resulting from manufacturing processes that utilize solder. The residues are usually generated by skimming the oxidized layer off molten solder in order to keep the remaining solder metal free from impurities and suitable for use. The Department continues to consider solder dross resulting from manufacturing or production processes to be classified as a "byproduct" as defined at 40 CFR § 261.1(c)(3). Byproducts, when reclaimed, are not solid wastes in accordance with 40 CFR § 261.2(c)(3).

Mixed lead scrap covers a variety of bulk solids from various sources. You have indicated that the materials that Alpha currently processes as mixed lead scrap includes solder wire scrap, solder anode butts, solder bar/ingots, etc. The Department concurs with your conclusion that these materials meet the definition of scrap metal at 40 CFR § 261.1(c)(6), and, when recycled, are excluded from regulation as solid wastes at either 40 CFR § 261.4(a)(13) (processed scrap metal) or at 40 CFR § 261.6(a)(3)(ii) (for all other recycled scrap metal not meeting the definition of excluded scrap metal at 40 CFR § 261.4(a)(13)).

Solder paste scrap, according to information provided by Alpha, is a "special formulation of solder powder (nominally 88%) and solder flux (nominally 12 %)." The solder paste scrap results from manufacturing processes that use solder paste and may include containers that held or still hold amounts of solder paste, as well as, rags, wipes and gloves that contain solder paste. The containers are returned to Alpha for a variety of reasons, however, the most prevalent being that the material has surpassed its shelf life, or has simply dried out, rendering it non-usable. The Department considers these solder paste items – rags, wipes, squeegees, etc. that contain solder paste, or the non-usable product - to be unused commercial chemical products. The solder paste contained on and in these items has not yet been used for its intended purpose, even if it

January 18, 2018

has been applied during manufacturing operations and wiped onto a rag or wipe. This solder paste is being reclaimed as defined 40 CFR § 261.1(c)(4). Commercial chemical products, when reclaimed, are not solid waste in accordance with 40 CFR § 261.1(c)(4).

As always, the regulatory determination made here is based on the information that was provided to the Department by Alpha. Should there be any significant variation in any of the materials involved in either the production, manufacturing, or recycling process, or if the information provided proves to be inaccurate, this regulatory determination may no longer be valid. Also, if any of these materials are speculatively accumulated as defined at 40 CFR § 261.1(c)(8), or if they are abandoned or disposed and not recycled, they will become solid and possibly hazardous wastes.

If you have any additional questions regarding this matter, do not hesitate to contact our office at 717-787-6239.

Sincerely,



M. Thomas Mellott
Environmental Program Manager
Division of Hazardous Waste Management
Department of Environmental Protection

cc: C. Fleming – SCRO
G. Mitzel - CO



ALTOONA WATER AUTHORITY

Permit No. 2017002

INDUSTRIAL USER PERMIT

In accordance with the provisions of the Altoona Water Authority Resolution No. 16-06-819 known at the Industrial Pretreatment Program Resolution,

Alpha Assembly Solutions, Inc.
4100 Sixth Avenue
Altoona, PA 16602

is hereby authorized to discharge industrial wastewater from the above identified facility through the outfalls identified herein into the Altoona Water Authority sewer system, in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all applicable pretreatment regulation, standards, or requirements under local, state and federal laws, including any such regulation, standards, requirements, or laws that might become effective during the term of this permit.

Noncompliance with any term or conditions of this permit will constitute a violation of the Altoona Water Authority Resolution No. 16-06-819 known as the Industrial Pretreatment Program Resolution.

This permit will become effective February 1, 2017 and will expire at midnight January 31, 2020.

If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of Section 4 of Resolution No. 16-06-819 known as the Industrial Pretreatment Program Resolution, a minimum of 90 days before the expiration date.

By:

Todd Musser
Environmental Services Manager
Altoona Water Authority

Issued this 29th day of December, 2016

Wastewater Treatment

144 Westerly Treatment Plant Road • Duncansville, PA 16635 • phone: 814.949.2218 • fax: 814-949-0979
www.altoonawater.com



pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WATER STANDARDS AND FACILITY REGULATION

**PAG-03
AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
GENERAL PERMIT FOR DISCHARGES OF
STORMWATER ASSOCIATED WITH INDUSTRIAL ACTIVITIES**

NPDES PERMIT NO: PAR203516

In compliance with the provisions of the Clean Water Act, 33 U.S.C. Section 1251 *et seq.* ("the Act") and Pennsylvania's Clean Streams Law, as amended, 35 P.S. Section 691.1 *et seq.*,

**Alpha Metals Inc.
4100 Sixth Avenue
Altoona, PA 16602**

is authorized to discharge stormwater from a facility located at:

**Alpha Metals Altoona
4100 Sixth Avenue
Altoona, PA 16602
Altoona City, Blair County**

to receiving water(s) named:

Unnamed Tributary to Mill Run in Watershed(s) 11-A

This authorization is subject to effluent limitations, Best Management Practices (BMPs), monitoring and reporting requirements and other terms, conditions, criteria and special requirements for the discharge of stormwater from point sources composed entirely of stormwater associated, in whole or in part, with industrial activity, as described in this General Permit, to surface waters of the Commonwealth, including to municipal separate storm sewers and nonmunicipal separate storm sewers.

Authorizations under the previous PAG-03 replaced by this General Permit are automatically continued under this General Permit for the remaining duration of the previously approved coverage. If the permittee is unable to comply with the terms of this General Permit, the permittee must submit an application for an individual permit within 90 days of publication of this final General Permit.

All monitoring requirements and BMPs specified in **Appendix B** on page no(s) B-1 of this General Permit apply to this discharge. The enclosed discharge monitoring report(s) (DMRs) must be submitted as required under Part A.3. of this General Permit and kept on-site as specified in this General Permit.

APPROVAL FOR COVERAGE TO DISCHARGE UNDER THIS GENERAL NPDES PERMIT SHALL COMMENCE JULY 1, 2015, AND SHALL EXPIRE AT MIDNIGHT JUNE 30, 2020, UNLESS EXTENDED IN WRITING BY DEP. IF THE GENERAL PERMIT IS RENEWED, REISSUED OR MODIFIED DURING THE TIME OF COVERAGE, THE FACILITY OR ACTIVITY COVERED BY THE APPROVAL FOR COVERAGE MUST COMPLY WITH THE FINAL RENEWED, REISSUED OR MODIFIED GENERAL PERMIT.

The aforementioned approval is authorized by:

**Maria D. Bebenek, P.E.
Clean Water Program Manager
Southcentral Regional Office
Department of Environmental Protection**



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: April 26, 2019

Effective Date: May 1, 2019

Expiration Date: April 30, 2024

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated.

State Only Permit No: 07-03034

Federal Tax Id - Plant Code: 06-1008504-1

Owner Information

Name: ALPHA ASSEMBLY SOLUTIONS
Mailing Address: 4100 6TH AVE
ALTOONA, PA 16602

Plant Information

Plant: ALPHA ASSEMBLY SOLUTIONS/ALTOONA
Location: 07 Blair County 07001 Altoona City
SIC Code: 3341 Manufacturing - Secondary Nonferrous Metals

Responsible Official

Name: JIM KACHMAR
Title: DIR OF MFG & SUPPORT
Phone: (814) 946 - 1611

Permit Contact Person

Name: PAUL ROBINSON
Title: EHS MANAGER
Phone: (814) 940 - 6737

[Signature]

WILLIAMR. WEAVER, SOUTHCENTRAL REGION AIR PROGRAM MANAGER

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

**General Permit
For
Processing/Beneficial Use of Residual Waste**

Permit No. WMGR081D043Date Amended April 21, 2014Date Issued April 21, 2014Date Expires April 21, 2024

The Department of Environmental Protection, Bureau of Waste Management, Division of Municipal and Residual Waste hereby approves the:

☐ Beneficial Use ☒ Processing prior to Beneficial Use ☐ Other

of: Uncontaminated and source separated electronics equipment and components by sorting, disassembling, mechanical processing (sizing, shaping, separating and volume reduction only) or transfer.

for use as: reuse or recycling by salvaging metals, plastics, glass, electronic or mechanical components.

This approval is granted to: Alpha Metals, Inc.

4100 6th Ave.

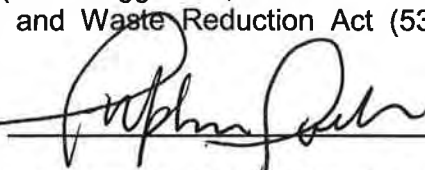
Altoona PA 16602

subject to the attached conditions and may be revoked or suspended for any project which the Department of Environmental Protection determines to have a substantial risk to public health, the environment, or cannot be adequately regulated under the provisions of this permit.

The processing of wastes not specifically identified in the documentation submitted for this approval, or the beneficial use of wastes not approved in this permit, is prohibited without the written permission of the Department.

This permit is issued under the authority of the Solid Waste Management Act (35 P.S. §§6018.101-6018.1003), The Pennsylvania Used Oil Recycling Act (58 P.S. §§471-480), The Clean Streams Law (35 P.S. §§691.1-691.1001), Sections 1905-A, 1917-A and 1920-A of the Administrative Code of 1929 (71 P.S. §§510-5, 510-17 and 510-20) and the Municipal Waste Planning, Recycling and Waste Reduction Act (53 P.S. §§4000.101-4000.1904).

This approval is granted:

By: 

☒ Statewide ☐ Regional

Title: Environmental Program Manager

THIS PERMIT IS NON-TRANSFERABLE

ALPHA Metal Reclamation Services

Pre - Audit Package



macdermidalpha.com
October, 2019

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ASSEMBLY SOLUTIONS