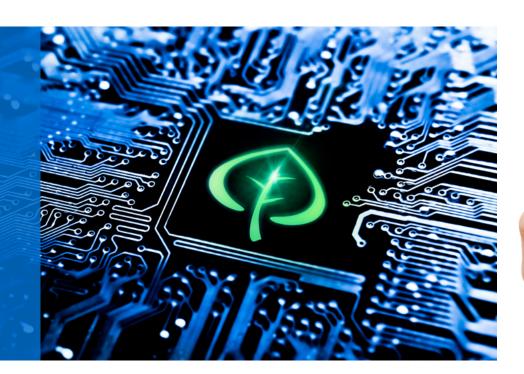
alpha 🗬





ALPHA Metal Reclamation Services

Pre - Audit Package



macdermidalpha.com April, 2022

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BACKGROUND INFORMATION

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BACKGROUND INFORMATION

alpha



ALPHA Reclamation Services Brochure

Maximize Your Metal Recovery Return



macdermidalpha.com April, 2022

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.







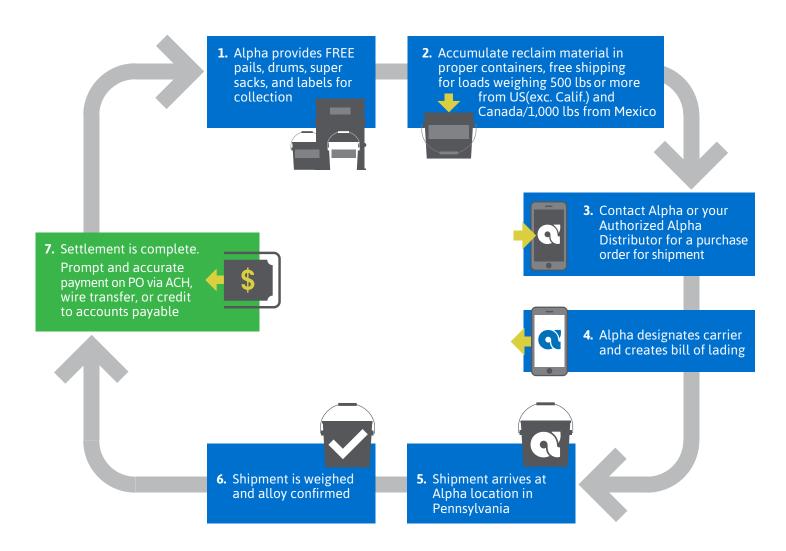


Benefit From Our Experience

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



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				/



An Easy Step-by-Step Process

COLLECTION TIPS



- Collect minimum quantity of material to qualify for free freight. 500 lbs from US(exc. Calif.) 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 gaylord, super sack or drum.
- If possible, containers should be palletized and shrink wrapped. When shipping drums, 4 drums per pallet. Alpha will provide plastic pallets upon request to any supplier in Mexico or Canada. If wooden pallets are used, they must include the correct ISPM 15 stamp or the shipment will be refused. Metal or plastic pallets do not require ISPM 15 identification.
- Items NOT accepted include electronics in their original housings (monitors, laptops, phones, batteries), 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).







Lead-free label (green ink)

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(exc. Calif.) 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 ACH, wire, or as a credit to accounts payable.

Canada and USA (except California): no manifest required

Mexico and California: manifest required



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.

Contacts



https://www.macdermidalpha.com/ assembly-solutions/products/recycling-services

US/CANADA

Mary Kay Summerville

Reclaim Coordinator 4100 6th Avenue Altoona, PA 16602

Tel: +1 (800) 289-3797 Tel: +1 (814) 940-3819 Fax: +1 (814) 940-6752

MaryKay.Summerville@macdermidalpha.com

UNITED STATES EAST & CANADA

Jack Wagner

Reclaim Manager

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 ${\tt Jack.Wagner@macdermidalpha.com}$

UNITED STATES WEST

Harold Sneath

Reclaim Manager

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WESTERN MEXICO

Tereso Contreras

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

Tel: +52 1(81) 4170-7469 Mob: +52 1(81) 1412-9207

Tereso.Contreras@macdermidalpha.com

EASTERN MEXICO

Nancy Pereyra

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

Tel: +52 1(81) 4624-4997 Mob: +52 1(81) 2355-4666

Nancy.Pereyra@macdermidalpha.com



macdermidalpha.com April, 2022





Page 1

Delaware The First State

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.



Authentication: 203106961

Date: 10-04-16

876949 8100 SR# 20165982347

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.

Seny - gilliel Six & R

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

Essue 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 Lloyd's Register to the following standards:

ISO 14001:2015, ISO 45001:2018

Approval number(s): ISO 14001 - 00011164, ISO 45001 - 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.



Cliff Muckleroy

Area Operations Manager Americas

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

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



001

Lloyd's Register Group Limited, its affiliates and subsidiaries, including Lloyd's Register Quality Assurance Limited (LRQA), and their respective officers, employees or agents are, individually and collectively, referred to in this clause as 'Lloyd's Register'. Lloyd's Register assumes no responsibility and shall not be liable to any person for any loss, damage or expense caused by reliance on the information or advice in this document or howsoever provided, unless that person has signed a contract with the relevant Lloyd's Register entity for the provision of this information or advice and in that case any responsibility or liability is exclusively on the terms and conditions set out in that contract. Issued by: Lloyd's Register Quality Assurance, Inc., 1330 Enclave Parkway, Suite 200, Houston, Texas 77077, United States for and on behalf of: Lloyd's Register Quality Assurance Limited, 1 Trinity Park, Bickenhill Lane, Birmingham B37 7ES, United Kingdom



SCOPE OF ACCREDITATION TO ISO/IEC 17025:2017

ALPHA ASSEMBLY SOLUTIONS 4100 Sixth Avenue Altoona, PA 16602

Lee Ann Olsick Phone: 814 940 6726 Lee Ann. Olsick @ Alpha Assembly.com

CHEMICAL

Valid To: February 29, 2024 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 <u>solders</u>.

Test Description	Test Method
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, B, Bi, Ca, Cd, Ce, Co, Cr, Cu, Fe, Ga, Ge, Hg, In, K, Na, Mg, Mn, Mo, Ne, Ni, P, Pd, Pt, Pb, S, Sb, Se, Si, Sn, Te, Ti, Tl, Y, Z, Zn	WI-01232
Gravimetric Density	
Tin Content	WI-00046

Page 1 of 1



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 17025:2017

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 22nd day of March 2022.

Vice President, Accreditation Services For the Accreditation Council

Certificate Number 2787.01

Valid to February 29, 2024

Certificate of Destruction alpha ASSEMBLY SOLUTIONS

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 Trafffic 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:	BOARDS/COMPONENTS Shredding, Melting & Destruction
Destruction Method	Sinedding, Weiting & Destruction
Name of Supplier:	
Address:	DUCE PRUSE
Issued on:	
Alpha Assembly Solutions 4100 6 th Avenue, Altoona, PA	America's Reclaim Department

Certificate of Recycling alpha ASSEMBLY SOLUTIONS

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.

Date Received:	
Weight Received	
Recycled Material Type:	
Method of Reclamation:	HIGH TEMPERATURE METAL RECOVERY
Name of Supplier:	
Address:	



Issued on:

Purchase Order Number:

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



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: 060921600033D Effective: July 1, 2021 Expires: June 30, 2022

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) 05/27/2021

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.

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PRODUCER Marsh USA Inc.				CONTAC NAME: PHONE			FAX		
St. Lou	rket Street, Suite 1100 s, MO 63101 ouis CottPortiot(@morph.com	0011		(A/C, No, E-MAIL ADDRES	•		(Á/C, No):		
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CN118	043759-GAWU21-22			INSURER	RA: Ironshore S	Specialty Insurance	e Company		25445
INSURI	D t Solutions Inc			INSURER	Rв: National Ur	nion Fire Ins Co. o	of Pittsburgh PA		19445
	ouglas Rinaldi			INSURER	R c : The Insurar	nce Company of t	he State of Pennsylvania		19429
	ight Street			INSURER	פ : New Hamp	shire Insurance C	So .		23841
vvaterb	ury, CT 06702			INSURER	RE: AIU Insurar	nce Company			19399
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NSR LTR	TYPE OF INSURANCE	ADDL SI	UBR VVD POLICY NUMBER		POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	3	
Α :	COMMERCIAL GENERAL LIABILITY		IEPICB83MS001	(04/30/2021	04/30/2022	EACH OCCURRENCE	\$	1,000,000
	CLAIMS MADE X OCCUP						DAMAGE TO RENTED	œ.	500 000

INSR LTR		TYPE OF INSURANCE	ADDL SU INSD W		POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMIT	s	
Α	Χ	COMMERCIAL GENERAL LIABILITY		IEPICB83MS001	04/30/2021	04/30/2022	EACH OCCURRENCE	\$	1,000,000
		CLAIMS-MADE X OCCUR					DAMAGE TO RENTED PREMISES (Ea occurrence)	\$	500,000
							MED EXP (Any one person)	\$	250,000
							PERSONAL & ADV INJURY	\$	1,000,000
	GEI	N'L AGGREGATE LIMIT APPLIES PER:					GENERAL AGGREGATE	\$	2,000,000
	Χ	POLICY PRO- JECT LOC					PRODUCTS - COMP/OP AGG	\$	2,000,000
		OTHER:					FIRE DAMAGE	\$	1,000,000
В	AU.	TOMOBILE LIABILITY		CA 8682557	04/30/2021	04/30/2022	COMBINED SINGLE LIMIT (Ea accident)	\$	1,000,000
	Χ	ANY AUTO					BODILY INJURY (Per person)	\$	
		OWNED SCHEDULED AUTOS ONLY					BODILY INJURY (Per accident)	\$	
		HIRED NON-OWNED AUTOS ONLY					PROPERTY DAMAGE (Per accident)	\$	
							,	\$	
Α	Χ	UMBRELLA LIAB X OCCUR		IEELCASB880D001	04/30/2021	04/30/2022	EACH OCCURRENCE	\$	25,000,000
		EXCESS LIAB CLAIMS-MADE					AGGREGATE	\$	25,000,000
		DED RETENTION \$						\$	
1 -		RKERS COMPENSATION DEMPLOYERS' LIABILITY		WC63850942 (AOS)	04/30/2021	04/30/2022	X PER OTH-ER		
D	ANY	PROPRIETOR/PARTNER/EXECUTIVE	N/A	WC63850943 (MA, WI)	04/30/2021	04/30/2022	E.L. EACH ACCIDENT	\$	1,000,000
E	(Mai	ndatory in NH)	11/2	WC 063850941 (FL)	04/30/2021	04/30/2022	E.L. DISEASE - EA EMPLOYEE	\$	1,000,000
E	If ye	s, describe under SCRIPTION OF OPERATIONS below		WC 063850940 (CA)	04/30/2021	04/30/2022	E.L. DISEASE - POLICY LIMIT	\$	1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required) MacDermid Alpha is an operating division of Element Solutions Inc

CERTIFICATE HOLDER	CANCELLATION
MacDermid Alpha 4100 6th Avenue Altoona, PA 16602	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 of Marsh USA Inc.
	Manashi Mukherjee Manashi Mukherjee



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY) 05/27/2021

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PRODUCER Marsh USA Inc.				CONTAC NAME: PHONE			FAX		
St. Lou	rket Street, Suite 1100 s, MO 63101 ouis CottPortiot(@morph.com	0011		(A/C, No, E-MAIL ADDRES	•		(Á/C, No):		
Allii. Si	_ouis.CertRequest@marsh.com FAX 212-948	-0011			INS	SURER(S) AFFOR	DING COVERAGE		NAIC#
CN118	043759-GAWU21-22			INSURER	RA: Ironshore S	Specialty Insurance	e Company		25445
INSURI	D t Solutions Inc			INSURER	Rв: National Ur	nion Fire Ins Co. o	of Pittsburgh PA		19445
	ouglas Rinaldi			INSURER	R c : The Insurar	nce Company of t	he State of Pennsylvania		19429
	ight Street			INSURER	פ : New Hamp	shire Insurance C	So .		23841
vvaterb	ury, CT 06702			INSURER	RE: AIU Insurar	nce Company			19399
				INSURER	RF:				
COV	RAGES CEI	RTIFICA	ATE NUMBER:	CHI-0	009852838-00		REVISION NUMBER: 0		
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		EXCESS LIAB CLAIMS-MADE					AGGREGATE	\$	25,000,000
		DED RETENTION \$						\$	
1 -		RKERS COMPENSATION DEMPLOYERS' LIABILITY		WC63850942 (AOS)	04/30/2021	04/30/2022	X PER OTH-ER		
D	ANY	PROPRIETOR/PARTNER/EXECUTIVE	N/A	WC63850943 (MA, WI)	04/30/2021	04/30/2022	E.L. EACH ACCIDENT	\$	1,000,000
E	(Mai	ndatory in NH)	11/2	WC 063850941 (FL)	04/30/2021	04/30/2022	E.L. DISEASE - EA EMPLOYEE	\$	1,000,000
E	If ye	s, describe under SCRIPTION OF OPERATIONS below		WC 063850940 (CA)	04/30/2021	04/30/2022	E.L. DISEASE - POLICY LIMIT	\$	1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required) MacDermid Alpha is an operating division of Element Solutions Inc

CERTIFICATE HOLDER	CANCELLATION
MacDermid Alpha 4100 6th Avenue Altoona, PA 16602	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 of Marsh USA Inc.
	Manashi Mukherjee Manashi Mukherjee



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

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

M. Thomas Mellott

Division of Hazardous Waste Management

Department of Environmental Protection

cc:

C. Fleming - SCRO

G. Mitzel - CO



Permit No. 2020002

INDUSTRIAL USER PERMIT

In accordance with the provisions of the Altoona Water Authority Resolution No. 17-05-852 known at the <u>Industrial Pretreatment Program Resolution</u>,

Paul G. Robinson, CSP EHS Manager Alpha Assembly Solutions 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. 17-05-852 known as the <u>Industrial Pretreatment Program Resolution</u>.

This permit will become effective February 1, 2020 and will expire at midnight January 31, 2023.

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. 17-05-852 known as the <u>Industrial Pretreatment Program Resolution</u>, a minimum of 90 days before the expiration date.

By: Josh Lyandt

Josh Wyandt

Environmental Services Manager

Altoona Water Authority

Issued this 13th day of January, 2020



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 <u>JULY 1, 2015</u>, AND SHALL EXPIRE AT MIDNIGHT <u>JUNE 30, 2020</u>, 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



September 30, 2016

ALPHA METALS INC 4100 6TH AVE ALTOONA PA 16602-1523

Re: Reissuance of PAG-03 General Permit

ALPHA METALS ALTOONA NPDES Permit No. PAR203516

Dear Permittee:

On September 24, 2016, the Department of Environmental Protection (DEP) published a final, reissued NPDES General Permit for Discharges of Stormwater Associated with Industrial Activity (PAG-03) in the *Pennsylvania Bulletin*. You are receiving this letter because, according to our records, you currently have coverage under the PAG-03 General Permit, and DEP would like to explain how the reissuance of the PAG-03 General Permit affects you.

The PAG-03 General Permit and supporting documents are available through DEP's website, www.elibrary.dep.state.pa.us (select Permit and Authorization Packages, Clean Water, and PAG-03 NPDES General Permit for Discharges of Stormwater Associated with Industrial Activity). Please visit this site and download and print the Sample Permit document (3850-PM-BCW0083d). As of September 24, 2016, the terms and conditions of your NPDES permit coverage have changed. The Sample Permit document contains the new terms and conditions of your NPDES permit coverage. It is important that you download and print the General Permit from DEP's website. The General Permit will not be sent to you by mail.

General Permit Changes

The following highlights the significant differences between the reissued PAG-03 General Permit (2016 General Permit) and the PAG-03 General Permit that was issued December 5, 2010 (2010 General Permit), which is no longer in effect and has been replaced with the 2016 General Permit.

• Renewal of Coverage – Unless specifically required by DEP, the submission of a Notice of Intent (NOI) to renew your coverage is no longer necessary. Annual reports (see below) will

serve as the notice of intent for continued coverage. If you have already submitted your renewal NOI to DEP, DEP may return the NOI to you without taking an action because you are already covered by the 2016 General Permit.

- Annual Reports An annual report must be submitted to DEP by May 1st of each year to document the pollution prevention and monitoring activities that have been undertaken by the permittee during the previous calendar year (January 1 December 31). The first annual report is due on May 1, 2017 for facilities that have been covered by the PAG-03 General Permit anytime during calendar year 2016. You must use DEP's annual report template, 3850-PM-BCW0083h, which is available through DEP's website noted above. The annual report must be submitted to the DEP regional office that approved coverage under the PAG-03 General Permit. The annual report is also used to document that you wish to continue coverage under the PAG-03 General Permit, and may be used to request termination of that coverage. Forms used by the 2010 General Permit for reporting self-inspections and information regarding stormwater sampling events are obsolete and should no longer be used as a result of the new annual report.
- Annual NOI Installment Payment An annual NOI installment payment is due by May 1st of each year in the amount of \$500. The first payment (check or money order) must be submitted by May 1, 2017. This payment must be sent to DEP's Bureau of Clean Water (BCW). DEP BCW intends to send an invoice to you approximately three months prior to each due date. If an electronic system is developed for these payments, DEP will notify you.
- New and Reorganized Appendices DEP has added new sector-specific appendices and climinated others, resulting in a reorganization of appendices in the PAG-03 General Permit. This reorganization may or may not affect you. For a crosswalk between the 2010 General Permit and 2016 General Permit appendices, please review DEP's fact sheet, 3850-PM-BCW0083i, available through DEP's website noted above. Based on the Standard Industrial Classification (SIC) Code that DEP has on file for your facility, DEP believes that you will need to comply with the monitoring requirements and Best Management Practices (BMPs) contained in Appendix B. However, if you believe that a different appendix is applicable to your facility, contact the DEP regional office that approved permit coverage for resolution.
- Monitoring Requirements New monitoring requirements are in effect for all sectors (appendices). Stormwater monitoring requirements apply to each sector with a sampling frequency of twice per year, with certain exceptions. The reporting periods are calendar semiannual periods, i.e., January 1 June 30 and July 1 December 31, with Discharge Monitoring Reports (DMRs) due on July 28 and January 28, respectively. Certain sectors must collect samples at specific times within the reporting periods. Please review the PAG-03 General Permit and the applicable appendix carefully and contact DEP with any questions. The first reporting period under the 2016 General Permit will begin on January 1, 2017. You are not required to collect samples for the remainder of 2016. If you have already collected samples in 2016 that have not been reported, you must report the

sample results on a DMR by January 28, 2017. Stormwater sampling must be conducted at all outfalls that are representative of the permittee's industrial activities. Representative outfalls must be reported to DEP on annual reports.

- Reporting Requirements In addition to the submission of annual reports to DEP by May 1st each year (which are paper-based until DEP develops an electronic system), DEP is requiring the submission of DMRs through DEP's electronic DMR (eDMR) system to implement the national NPDES Electronic Reporting Rule. You must submit the necessary paperwork to register for use of eDMR by December 21, 2016 if you are not already using the eDMR system. When DEP notifies you that your account and reports are set up, you must use eDMR to submit your DMRs. In the interim, if you are not already using eDMR, you should continue to submit DMRs on paper to the DEP regional office that approved permit coverage. DEP's eDMR website is www.dep.pa.gov/edmr.
- Benchmark Values Certain parameters in each appendix have benchmark values
 associated with them. These values are not effluent limitations; however, exceedances of the
 values for the same parameter at the same discharge point (outfall) for two or more
 consecutive reporting periods will result in the need for you to develop and submit a
 Corrective Action Plan (CAP) to the DEP regional office that approved permit coverage
 within 90 days of the end of the monitoring period triggering the need for the CAP.
- Self-Inspection Requirements All permittees must conduct semiannual visual inspections of the permittee's facilities (see Part C III, Routine Inspections). These inspections must be documented on annual reports that are submitted to DEP by May 1st each year. The requirement to conduct semiannual visual inspections of your operation does not begin until January 1, 2017. If you have completed one self-inspection in 2016, this will satisfy the inspection requirements for the 2010 General Permit and should be documented on the first Annual Report due May 1, 2017.
- BMP Requirements The 2016 General Permit contains some revised general and sector-specific BMPs (see Part C II, BMPs Applicable to All Permittees, and the sector-specific appendix applicable to your facility). Permittees with coverage under the 2010 General Permit have until September 24, 2017 to implement BMPs that were not prescribed by the 2010 General Permit. In addition, BMPs that are not identified in the 2016 General Permit but offer equivalent environmental protection may be approved by DEP in lieu of the specific BMPs identified in the 2016 General Permit.
- Authorized Non-Stormwater Discharges While there have been no significant changes between the non-stormwater discharges authorized by the 2010 and 2016 General Permits, the 2016 General Permit includes new authorized non-stormwater discharges for certain sectors, as contained within the appendices, as well as prohibitions.
- Eligibility Criteria The eligibility criteria for the 2016 General Permit have changed in comparison to the 2010 General Permit (see "Discharges Not Authorized By This General

Permit"). For example, facilities with stormwater discharges to waters with a Total Maximum Daily Load (TMDL) that have a wasteload allocation (WLA) are not eligible for the 2016 General Permit. You are encouraged to review these criteria closely to determine your eligibility for the 2016 General Permit. If you determine that you are no longer eligible, or otherwise if you determine that you will be unable to comply with the 2016 General Permit, you must submit an application for an individual NPDES permit by December 23, 2016 (90 days following publication of the 2016 General Permit). In addition, DEP may, at any time during the term of your coverage under the PAG-03 General Permit, determine that you are ineligible for continued coverage and require the submission of an individual permit application.

These are the significant changes in the 2016 General Permit, but there are other changes that may affect you. You are encouraged to visit DEP's website, download, and print all relevant PAG-03 documents and contact the DEP regional office that approved permit coverage if you have any questions. If your coverage under the PAG-03 General Permit has expired and you have not submitted an NOI to DEP to renew your coverage, you are encouraged to submit a PAG-03 NOI or individual permit application as soon as possible.

Sincerely

Sean M. Furjanic, P.

Environmental Program Manager

Division of Operations, Monitoring, and Compliance

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COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date:

April 26, 2019

Effective Date:

January 16, 2020

Revision Date:

January 16, 2020

Expiration Date:

April 30, 2024

Revision Type:

Amendment

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]

Unllean R Meaver

WILLIAM R. 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

mit No. WMGRU81DU43	Date Amended April 21, 2014
e Issued <u>April 21, 2014</u>	Date Expires April 21, 2024
The Department of Environmental Prote Municipal and Residual Waste hereby a	ection, Bureau of Waste Management, Division of approves the:
Caracian San San San San San San San San San S	ng prior to Beneficial Use
	cessing (sizing, shaping, separating and
volume reduction only) or transfer.	
	ging metals, plastics, glass, electronic or
mechanical components.	
which the Department of Environment	
provisions of this permit. The processing of wastes not specifica	ally identified in the documentation submitted for wastes not approved in this permit, is prohibited
§§6018.101-6018.1003), The Pennsylv 480), The Clean Streams Law (35 P.S and 1920-A of the Administrative Code	ty of the Solid Waste Management Act (35 P.S. vania Used Oil Recycling Act (58 P.S. §§471-6. §§691.1-691.1001), Sections 1905-A, 1917-Act of 1929 (71 P.S. §§510-5, 510-17 and 510-20) Recycling and Waste Reduction Act (53 P.S.
This approval is granted:	By: tophing fill
⊠ Statewide □ Regional	Title: Environmental Program Manager

Pre - Audit Package







April 2022

Alpha and Kester are a product brand of MacDermid Alpha Electronics Solutions.



For more information, contact us at Assembly@MacDermidAlpha.com

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