

**CYBERSHIELD OF TEXAS
LUFKIN, TEXAS**

**POLLUTION PREVENTION PLAN
EXECUTIVE SUMMARY**

2005

**Updated: December 9, 2004
By: Louis Dunham**

**CYBERSHIELD OF TEXAS
LUFKIN, TEXAS
POLLUTION PREVENTION PLAN
EXECUTIVE SUMMARY**

TABLE OF CONTENTS

- 1 FACILITY DESCRIPTION
- 2 LIST OF ALL HAZARDOUS WASTE GENERATED AND QUANTITIES
- 3 LIST OF ALL TRI REPORTABLE RELEASES AND QUANTITIES
- 4 PRIORITIZED LIST OF POLLUTANTS AND CONTAMINANTS
- 5 STATEMENT OF MEASURABLE REDUCTION GOALS
- 6 ENVIRONMENTAL AND HUMAN HEALTH RISK CONSIDERATIONS
- 7 POLLUTION PREVENTION PROJECTS WITH IMPLEMENTATION SCHEDULE
- 8 IMPLEMENTATION SCHEDULE FOR FUTURE REDUCTION GOALS
- 9 IDENTIFICATION AND DESCRIPTION OF CASES IN WHICH IMPLEMENTATION OF A PROJECT MAY RESULT IN THE RELEASE OF A DIFFERENT POLLUTANT OR CONTAMINANT

**CYBERSHIELD OF TEXAS
POLLUTION PREVENTION PLAN
FACILITY DESCRIPTION**

Name of Facility: Cybershield of Texas

Address:

Physical: 2602 Spence Street
 Lufkin, Texas 75904

Mailing: 308 Ellen Trout Drive
 Lufkin, Texas 75904

Technical Contact: Louis Dunham

Facility Description Cybershield of Texas performs EMI/RFI shielding of plastic parts through electroless metal plating and conductive paint operations for business machines. Cybershield also performs Vacuum Metallization (VM), inserting, pad printing, conductive Form-In-Place (FIP) gasketing, and decorative painting of plastic parts for business machines. The facility is located on approximately 12 acres surrounded by medium industry.

TABC Account No.: AC0023G

EPA I.D. No.: TXD000719377

TRI Identification No: 75901CHRMM2602S

TCEQ SWRN: 30194

TXPDES Permit Number: TXR05R722

Primary SIC Code: 3471

CYBERSHIELD OF TEXAS
POLLUTION PREVENTION PLAN
LIST OF ALL HAZARDOUS WASTE GENERATED AND QUANTITIES

CYBERSHIELD OF TEXAS
POLLUTION PREVENTION PLAN
LIST OF ALL TRI REPORTABLE RELEASES AND QUANTITIES

Pollution Prevention Plan Progress Sheet

Cybershield of Texas			Calendar Year Generated															Total Five Year Reduction
List of TRI Releases	Revised	December 18, 2004	2003 (Base Year)	2005	Predicted amt based	% reduction of IG	2006	Predicted amt based	% reduction of IG	2007	Predicted amt based	% reduction of IG	2008	Predicted amt based	% reduction of IG	2009	Predicted amt based	
Actual	Actual		Actual	Actual	on AP Index	Act/Predict												
Total Reported	Total Reported		Total Reported	Total Reported	on AP Index	Act/Predict	Total Reported	on AP Index	Act/Predict	Total Reported	on AP Index	Act/Predict	Total Reported	on AP Index	Act/Predict	Total Reported	on AP Index	Act/Predict
(from TRI Sect 8.1)	(from TRI Sect 8.1)		(from TRI Sect 8.1)	(from TRI Sect 8.1)														
Base Year	Year 1		Year 1	Year 1			Year 2	Year 2		Year 3	Year 3		Year 4	Year 4		Year 5	Year 5	
Enter	Enter		Linked	Linked			Enter	Linked	Linked									
No	Stream Description	Notes	Pounds	Pounds														
1	Chromium Compounds		9100		0	#DIV/0!		N/A	N/A		N/A	N/A		#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!
2	Nitric Acid		7270		0	#DIV/0!		#DIV/0!	#DIV/0!									
3	Copper Compounds		3511		0	#DIV/0!		#DIV/0!	#DIV/0!									
4	Formaldehyde		1754		0	#DIV/0!		#DIV/0!	#DIV/0!									
Total lbs.			21,635	0														
Total tons			10.82	0.00			0.00			0.00			0			0		
Square Feet Produced		Enter (Sq. Ft.)	717,296	0			0			0			0			0		
AP Index (current/previous yr)		Linked	NA	0.0000			#DIV/0!			#DIV/0!			#DIV/0!			#DIV/0!		

CYBERSHIELD OF TEXAS

POLLUTION PREVENTION PLAN

PRIORITIZED LIST OF POLLUTANTS AND CONTAMINANTS

<u>Waste Stream</u>	<u>Waste Prioritization*</u>
1. Mixed Plating Waste	2
2. Spent Nitric Acid	3
3. Metal Hydroxide Cake	4
4. Gold Plating Solution	5
4. Non-Hazardous Copper Plating Solution	1

* Based upon 2003 Data

CYBERSHIELD OF TEXAS
POLLUTION PREVENTION PLAN
STATEMENT OF MEASURABLE REDUCTION GOALS

Cybershield of Texas has developed Pollution Prevention Goals for its Lufkin facility for:

- * Reducing the amount of hazardous/Class 1 waste generated
- * Reducing the number and amount of TRI releases
- * Reducing the risk to human health and the environment
- * Increasing employee awareness of pollution prevention
- * Increasing recycling activities
- * Reducing company liability

Cybershield of Texas has also established incremental goals on waste reduction to monitor progress of long term goals.

Cybershield's goals for waste minimization / source reduction are as follows:

- 1) Average Yearly reduction of 10% hazardous/Class 1 waste generated for five years (from base year 03)
- 2) Overall reduction of 41% hazardous/Class 1 waste generated by the year 2009 (from base year 03)

Goals (1) & (2) are based upon A/P index. All reductions based on CY 2003.

Cybershield's goals for waste minimization / source reduction are summarized below:

Base Year 2003		Year 1 2005	Year 2 2006	Year 3 2007	Year 4 2008	Year 5 2009	Total tons of HW reduced
1053 tons generated	(Goal) Tons of HW reduced	105	95	85	77	69	431 total tons reduced or minimized over 5 year plan

Cybershield of Texas expects relatively flat plating production of 800,000 square feet per annum over the plan life. Appropriate adjustments will be made if production levels are significantly different than predicted.

Assumption:

1053 tons of HW – 431 tons of HW reduced during plan life = 622 tons generated in 2009.

CYBERSHIELD OF TEXAS
POLLUTION PREVENTION PLAN
ENVIRONMENTAL AND HUMAN HEALTH RISK CONSIDERATIONS

Throughout the development of this Pollution Prevention Plan and the identification of source reduction and waste minimization projects, **Cybershield of Texas** has identified minimal, if any, risks to human health and the environment by plan and project implementations.

Reductions in the amount of hazardous wastes generated result in reductions to employee exposures. This reinforces our goal to reduce the risks to human health and the environment.

New raw materials or alternative chemical substitutions, targeted in **Cybershield's** source reduction/waste minimization projects, are required to have lower risks to human health and the environment before the projects are even considered.

CYBERSHIELD OF TEXAS, INC.

POLLUTION PREVENTION PLAN

IMPLEMENTATION SCHEDULE FOR POLLUTION PREVENTION PROJECTS

Proj. No.	Activity Project Description	Project Type	Target Date	Notes
1	Nitric Acid Recovery System	SR	December 2006	
2	Nitric Acid Substitution	SR	December 2006	
3	Batch Treatment System	SR	March 2005	Ongoing since Spring 2004
4	Zero Discharge	WM	December 2007	
5	Re-usable paint filters	SR	December 2005	
6	Carbide Black & Wash Primer Paint Substitution	SR	August 2005	
7	Chemical Substitution	SR	Ongoing	Evaluations will vary.
8	Plant Inspections	Both	January 2005	Perform on at least semi-annual basis thereafter
9	Bulk Chemical Containers	WM	August 2005	
10	Solvent Recovery Unit	SR	August 2006	
11	Office Paper Recycling	SR	August 2005	
12	Sludge Dryer	WM	December 2005	
13	Employee Reward Program	Both	December 2005	
14	Annual Training	Both	2005	Add to training schedule
15	Decharacterize Filter Cake	WM	December 2005	

Cybershield's "Pollution Prevention Task Force" has identified the following milestones for individual project development.

- * Definition of project costs
- * Capital expenditures available
- * Scheduling of equipment installation
- * Scheduling of available resources
- * Effects on production operations
- * Project operational costs
- * Changes in technology
- * Changes in processes
- * New regulations
- * Unforeseen and unexpected events

CYBERSHIELD OF TEXAS
POLLUTION PREVENTION PLAN
IMPLEMENTATION SCHEDULE FOR FUTURE REDUCTION GOALS

Cybershield of Texas will review the facility and incremental goals as appropriate and required. Upon review of the existing goals, it will be determined that a goal be revised/ updated or an additional goal be established. **Cybershield of Texas** will then implement the following schedule.

1. **Cybershield of Texas** will provide notice on revised or updated existing facility and incremental goals within 30 days of the date revised or updated. This will be accomplished by submitting an updated Executive Summary

2. **Cybershield of Texas** will provide notice of additional pollution prevention goals within 30 days of development by Executive Summary.

3. Implementation of revised/updated goals and future goals will follow the schedule identified in the revision/update or the schedule identified in the new goal.

CYBERSHIELD OF TEXAS, INC.

POLLUTION PREVENTION PLAN

IDENTIFICATION AND DESCRIPTION OF CASES IN WHICH IMPLEMENTATION OF A PROJECT MAY RESULT IN THE RELEASE OF A DIFFERENT POLLUTANT OR CONTAMINANT

Cybershield of Texas has identified the following cases in which implementation of a source reduction/waste minimization project may result in (1) the generation/release of a different pollutant and/or (2) a shift in release medium.

1. Operation of a nitric acid recovery unit would likely cause an increase in metal hydroxide filter cake generation due to the removal of copper and nickel metal.
2. Expansion of the onsite wastewater treatment system to accommodate the treatment of bulk liquid process wastes will shift waste generation from the liquid to solid medium, i.e. increased metal hydroxide filter cake production.
3. Chemical substitution may result in medium shift(s). However, due to the vast number of possibilities, specific information on this subject is unavailable until particular chemicals are evaluated.
4. Operation of a sludge dryer would result in some degree of new air emissions.

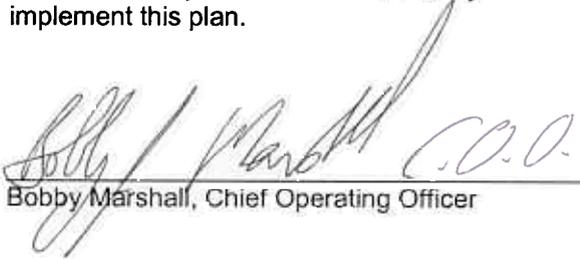
CYBERSHIELD OF TEXAS, INC.

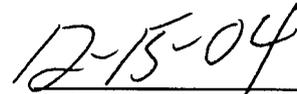
POLLUTION PREVENTION PLAN

CERTIFICATE OF COMPLETENESS AND CORRECTNESS

This document certifies that the Pollution Prevention Plan has been completed and meets the specified requirements of the Waste Reduction Policy Act of 1991, the Solid Waste Disposal Act, and 31 TAC §§335.471- 335.480. Furthermore, the information provided herein is true, correct, and complete to the best of my knowledge.

I certify that I have the authority to commit the corporate resources necessary to implement this plan.


Bobby Marshall, Chief Operating Officer


Date