### AIR PERMIT APPLICATION

### Title V Operating Permit Renewal Application

**AVX Corporation Myrtle Beach, South Carolina** 



**May 2011** 

RESOLUTE ENVIRONMENTAL LLC

### **Table of Contents**

1.	Permit 1	Renewal Application Summary	1-1
	1.1 Facility	ı Location	1-2
		Historical and Current Operations	
	1.3 Title V	Applicability	1-5
		t for Application Shield	
	1.5 Reques	t for Permit Shield	1-5
	1.6 Applica	ation Elements	1-6
2.	Process	Description	2-1
	2.1 Raw M	laterials Manufacturing (Unit ID 14)	2-1
		anufacturing (Unit ID 15)	
	-	Department (Unit ID 16)	
	2.4 CMAP Buildup (Unit ID 17)		
	2.4.1 Desorber Parametric Permit Limit Revision		<b>2</b> -3
	2.5 CMAP Support Department (Unit ID 18)		2-4
	2.6 Metallization Department (Unit 19)		2-6
	2.6.1 Termination		2-6
	2.6.1 Plating		2-6
	2.7 Suppor	ting Processes (Unit ID 21)	2-7
	2.8 Trivial	and Insignificant Activities	2-7
3.	Emission (	Calculations	3-1
	3.1 Materio	al Mass Balance Calculations	3-1
		Emission Factors	
	3.3 Other I	Emission Sources	3-3
4.	Regulator	y Applicability Analysis	4-1
	4.1 Federal	Regulatory Applicability	4-1
		SPS Subpart A, General Provisions	
	4.1.2 NSPS Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Ur		
4.1.3 Part 63 NESHAP Applicability (Subparts A & B)		rt 63 NESHAP Applicability (Subparts A & B)	4-2
		rt 64 Compliance Assurance Monitoring	
		rt 82, Subpart F Stratospheric Ozone Protection Regulations	
	4.2 South (	Carolina Regulations	4-4
	4.2.1	62.5 Standard 1, Emissions From Fuel Burning Operations	4-4
	4.2.2	62.5 Standard 2, Ambient Air Quality Standards	4-5
	4.2.3	62.5 Standard 3, Waste Combustion and Reduction	
	4.2.4	62.5 Standard 4, Emissions From Process Industries	4-6
	4.2.5	62.5 Standards 5.1, VOC Emissions Control and LAER	4-6
	4.2.5	62.5 Standard 8, Toxic Air Pollutants	
	4.3 State C	Operating Permit Conditions	4-7

### **List of Appendices**

Appendix A: Facility Location and Plot Plan

Appendix B: Process Flow Diagrams
Appendix C: Equipment Identification

Appendix D: Application Forms

Appendix E: Supporting Emission Calculations
Appendix F: Air Dispersion Modeling Analysis

Appendix G: Compliance Assurance Monitoring Plan

Appendix H: February 23, 2011 Letter to DHEC - Desorber Parametric Permit Limits

Appendix I: Supporting Documentation

### 1. Permit Renewal Application Summary

AVX Corporation (AVX) owns and operates an electronic capacitor manufacturing facility in Myrtle Beach, South Carolina. In the past, the facility was a major source of volatile organic compounds (VOC) with respect to the Part 70 (Title V) Operating Permit Program because potential emissions exceed the applicable major source threshold of 100 tons per year (tpy). The facility was also a major hazardous air pollutant (HAP) source having emissions greater than10 and 25 tons per year for a single and aggregate HAP, respectively. More recently, due to raw material changes, reduced production, and regulatory changes, the facility is no longer major based on VOC or HAP emission levels. However, with the USEPA's May 16, 1995 interpretation guidance of the general provisions of 40 CFR 63 and Section 112 of the Clean Air Act, a facility that was once a major source of HAP emissions, will always be considered major and must continue to comply with applicable requirements. This guidance is more commonly referred to as the "once in, always in" policy. On December 21, 2006, the USEPA proposed, in essence, a reversal of this policy, however, this proposal has not been finalized. As a result, AVX remains classified as a major source and is therefore submitting this Title V renewal application to the South Carolina Department of Health and Environmental Control (DHEC).

As detailed in Section 4.3, AVX is hereby formally requesting removal of the 39.5 ton per year VOC emission limit on the new manufacturing building and replacing it with a facility-wide PSD avoidance limit of less than 250 tons per year. This request is based on AVX's position that the facility is a true minor source with respect to Prevention of Significant Deterioration (PSD) applicability. Removal of the limit will provide needed flexibility in the building that will contain the facility's consolidated manufacturing.

This revision to the initial renewal application includes an updated equipment inventory, unit identification streamlining, an emissions inventory using current materials and throughputs, regulatory analysis, and revised permit application forms.

### 1.1 Facility Location

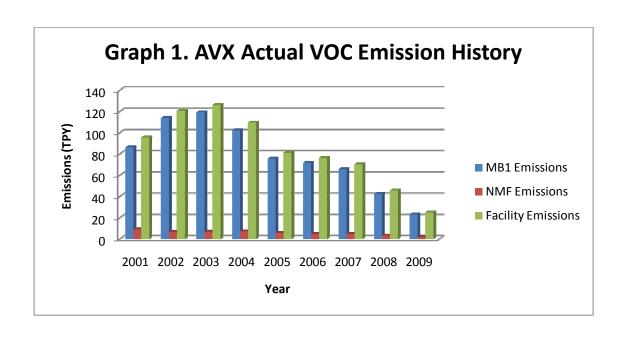
The Myrtle Beach facility is located in Horry County in northeastern South Carolina. The facility is located approximately two kilometers inland of the Atlantic Ocean at U.S. Highway 17 and 17<sup>th</sup> Avenue South. This site is bordered by the South Carolina National Guard and the Myrtle Beach Jetport. Appendix B, Figure 1 shows the location of the plant. Figure 2 in Appendix B is a facility plot plan showing the location of the facility on the property.

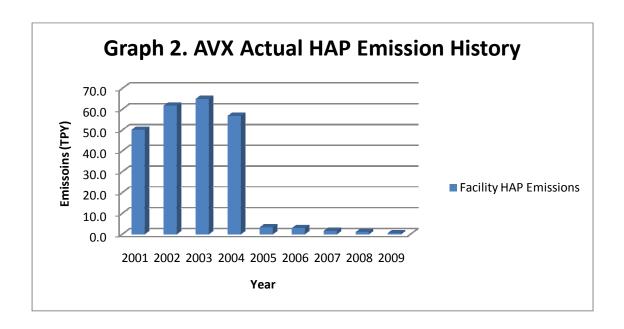
### 1.2 Facility Historical and Current Operations

The AVX facility produces electronic capacitors used in aerospace, data processing, telecommunications, and military applications. There have been two manufacturing areas at the facility: a main production building (MB1) on the northeast portion of the property and a newer manufacturing building (MB2 or NMF) on the southwest portion of the property. MB1 was originally constructed in 1949 and the main facility, as it exists today, commenced construction in 1985. Construction for MB2 commenced in 1998. The following timeline presents the history of AVX, including the Myrtle Beach, SC facility:

- 1948 Electrical Reactance Corporation started capacitor operation in Myrtle Beach, SC
- 1952 Electrical Reactance becomes the "Hi-Q" Division of Aerovox in Myrtle Beach, SC
- 1961 Aerovox established multilayer ceramic capacitor manufacturing
- 1972 Aerovox separates into two separate corporations, Aerovox Corp. and AVX Corp.
- 1975 AVX becomes the world's leading capacitor manufacturer
- 1990 AVX merged with KyoceraCorp. And became a wholly owned separate operating subsidiary of Kyocera
- 2000 AVX is currently owned 70% by Kyocera, and 30% general public

Since 2003, emissions from AVX processes have trended downward. Bar graphs 1 and 2 below show actual VOC and organic HAP emissions, respectively.





A few factors can be attributed to this trend in emission rates.

- Since the mid-1990s, AVX has been developing more efficient manufacturing processes
  as a result of facing stiffer competition. Increased efficiency results in less raw material
  usage and therefore lower emissions.
- AVX has taken steps to eliminate hazardous materials previously used in their manufacturing. Materials containing hazardous compounds such as trichloroethylene, methylene chloride and xylene, once used in large quantities, have been either phased

- out completely or used in much smaller quantities. Also, the U.S. EPA's decision to remove ethylene glycol monobutyl ether (2-butoxyethanol; 111-76-2) from the federal HAP list (Federal Register, November 29, 2004) significantly reduced reportable HAP emissions from the facility (See Graph 2). 2-Butoxyethanol is one of the main components in electrode ink and ceramic slip.
- 3. Due to some losses to competition, some production tools have been shipped offsite. For comparison, the 2004 Title V operating permit contains 806 listed equipment items (permitted and insignificant). This Title V renewal application contains 341 equipment items (permitted and insignificant). It should be noted however, the original AVX Title V application included production and support equipment that was never installed. The application included equipment needed to meet future production levels. However, theses production levels were never realized. Potential VOC emissions based on the original Title V equipment inventory was 283 tons per year. In 2006, revised calculations indicated a facility-wide VOC potential emission rate of 94 tons per year. This Title V renewal application shows a 60 ton per year VOC emission rate potential.

Chip manufacturing was performed in MB1 and MB2. However, AVX recently consolidated all chip manufacturing into MB2 to continue improving efficiency and reducing environmental impacts. At this time, only electroplating and chip finishing operate in the MB1 main building. At some point, these processes will either be relocated to MB2 or shipped off-site. Once all equipment is removed from the MB1 main building, it will be decommissioned. Decommissioning does not include the RMM, Metals, and Slip departments located next to MB1.

This renewal application serves to revise the AVX permit to reflect new manufacturing arrangement as well as update raw material usages and emission rates. The delineation between MB1 and MB2 will no longer be used, as there will no longer be process description redundancy. Therefore, what was MB2 will be referred to as CMAP Build Up, Thin Film, CMAP and Support. What was MB1 will be referred to by the separate RMM, Slip, Metals, and Metallization departments.

### 1.3 Title V Applicability

As stated previously, although AVX Myrtle Beach does not currently emit regulated compounds above major source thresholds, the facility is classified as a major stationary source per USEPA's "once in, always in" guidance for sources subject to 40 CFR Part 63. At one time, the facility's potential emissions exceeded the major source thresholds of 10 and 25 tons per year for emissions of individual and the aggregate total hazardous air pollutants (HAP), respectively. Therefore AVX is required to operate under a major source operating permit.

### 1.4 Request for Application Shield

Section 503(d) of the CAAA provides that once a timely and complete application for an operating permit has been filed, the applicant is shielded from enforcement action for operating without a permit until the permit has been issued or other action has been taken on the application. S.C. Regulation 62.70.7 (b) incorporates into state law the concept of an application shield for sources required to obtain a major source-operating permit.

The Myrtle Beach facility submitted the original Title V operating permit application in April 1998 and renewal application in April 2004. It is AVX's understanding that an application shield is in place as a result of the complete and timely application submitted in 2004. Therefore, the Myrtle Beach facility cannot be subject to enforcement action for operating without a permit during the period of time that the permit application has been under review by DHEC. This current submittal constitutes a revision to the original application, and AVX requests the continuation of the existing application shield.

### 1.5 Request for Permit Shield

Section 504(f) of the CAA defines the permit shield provision whereby the permitting authority is empowered to provide that compliance with a Part 70 permit shall be considered compliance with all other applicable provisions of the Act. S.C. Regulation 62.70.6 (f) incorporates into state law the concept of a permit shield. A provision stating that compliance with the conditions of

the Part 70 permit shall be deemed as compliant with any applicable requirements (as of the date of permit issuance) provided that the following S.C. Regulation 62.70.6 conditions are met:

- Such applicable requirements are identified and included in the permit; or
- DHEC determines that other requirements are not applicable to the source, and the permit includes the determination or listed provisions.

AVX requests inclusion of the permit shield recognizing any requirements with which the facility must comply, as well as any provisions not applicable to AVX.

### 1.6 Application Elements

This application for a Title V operating permit application contains the following elements:

- Section 2 contains the facility process description
- Section 3 discusses emission calculations
- Section 4 details the regulatory applicability analysis
- Appendix A includes site location and facility plot plan figures
- Appendix B contains the process flow diagrams
- Appendix C includes revised Emission Unit ID and equipment description descriptions
- Appendix D contains DHEC Title V operating permit application forms
- Appendix E details the emission estimates
- Appendix F includes a facility-wide air pollutant dispersion modeling analysis
- Appendix G presents the Compliance Assurance Monitoring Plan
- Appendix H provides supporting documentation

### 2. Process Description

Operations in the Myrtle Beach complex include Raw Materials Manufacturing (RMM), Slip Manufacturing, Metals Department, CMAP Buildup, CMAP Support Department, Kiln Room, Metallization Department and other supporting processes. Detailed descriptions of the processes are given in the following sections. Process descriptions emphasize material flow, as AVX uses a material mass balance approach to track emissions. Please refer to the process flow diagrams in Appendix C and the equipment inventory entered on DHEC "Section D" forms in Appendix E.

### 2.1 Raw Materials Manufacturing (Unit ID 14)

The chip manufacturing process at AVX begins with the Raw Materials Manufacturing department (RMM). Individual metal salt are blended together with water and dispersants in a batch process to produce a formulated ceramic compound. The ceramic material is then ground and milled to reduce particle size. Ceramic powder is prilled to reduce water content by placing the material on a belt moving through a heater. The material is then either fired to physically react the constituents or further dried to remove excess moisture and dispersant.

Emissions from this portion of the RMM are primarily particulate matter (PM) emissions from grinding and milling operations. These emissions are controlled by three baghouses.

It should be noted that the chemical barium titrate process, and associated equipment, is no longer in operation in the RMM Department.

### 2.2 Slip Manufacturing (Unit ID 15)

Ceramic powders from RMM are transferred to the Slip Manufacturing department building. The powders are blended with organic solvents such as butyl cellosolve (BC) and propylene glycol monomethyl ether (PGME) to produce a flow able ceramic slurry, also known as slip.

Mixing takes place in various sized, mixing vessels, and holding tanks as appropriate to prepare a particular slurry batch. The slurry is mixed and milled to achieve the necessary particle size distribution. Mixing and milling occurs primarily in sealed or covered containers to maintain specific product viscosity specifications. This limits the VOC and HAP emissions generated from the mixing of solvents with the powder and equipment cleaning. The emissions are vented to the atmosphere through a single room vent and as fugitive emissions through windows and door openings.

Emission estimations are based on 100% loss or a percentage loss depending on the material used (manufacturing or equipment cleaning). From process engineering knowledge required to meet viscosity specifications when manufacturing slip, material rework, and waste recovery, solvent losses are less than 1%. In communications between AVX and DHEC, it has been agreed to estimate emissions through conservative loss factors of 10% or 20%, depending on the uses of the organic material.

### 2.3 Metals Department (Unit ID 16)

In the metals department, conductive metal inks (electrode inks) and pastes (termination pastes) are produced. The process is similar to slip manufacturing where solvents and fillers (organic binders) are added to powders, blended, and then milled to achieve the proper particle size distribution. VOC and HAP are emitted during mixing and milling through air conditioning vents and exhaust vents that have no pollution abatement.

Similar to slip manufacturing, emission estimations are based on percentage losses depending on the material used (manufacturing or equipment cleaning). From process engineering knowledge required to meet viscosity specifications when manufacturing slip, material rework, and waste recovery, solvent losses are less than 1%. In communications between AVX and DHEC, it has been agreed to estimate emissions through conservative loss factors of 10%, 20% or 100%, depending on the uses of the organic material.

### 2.4 CMAP Buildup (Unit ID 17)

In the Chip Manufacturing Automated Process (CMAP) operations, capacitors are produced in a "build-up" process in which the ceramic slip is laid down with alternating layers of electrode ink on glass plates. A conservative rate of 70 kg of slip is processed per CMAP machine per day has been used for emission estimation purposes. Approximately 15% of this amount is collected for material reclaim. The facility is designed for 24 chip manufacturing machines. There are currently only 18 machines in operation.

VOC in slip and ink are emitted during application of the materials when manufacturing the capacitors. The CMAP machines are designed with enclosures for capture and control of emissions. Exhausts are vented to a VOC abatement control system consisting of three (one 14,500 acfm and two 5,000 acfm) parallel adsorber/ desorber units in series with one thermal oxidizer. On February 26, 2009 a destruction test was performed on one 5,000 acfm adsorber/desorber unit and thermal oxidizer. Results demonstrated a thermal destruction efficiency of 99.99% and an overall VOC removal efficiency of 99.5%. However, AVX will use an achievable 98.5% control efficiency in emission rate calculations for conservatism.

A small amount of HAPs are present in denatured alcohol used for machine cleaning. Until recently, virgin xylene was used for cleaning; however, AVX has replaced xylene with n-butyl acetate in the CMAP Department and propyl propionate at the termination area. Xylene is still used as an ingredient (dispersant) in solvent solutions for the manufacturing of electrode inks and ceramic slip.

### 2.4.1 Desorber Parametric Permit Limit Revision

The current Title V permit requires that AVX desorber carbon beds be operated at, or below, temperature of 500 degrees F and at, or above, a temperature of 350 degrees F. In a February 23, 2011 letter to DHEC (with supporting vendor information), AVX has requested modification to these operating temperature limits to avoid reportable permit deviations when the system is actually functioning as designed.

The 500 degree upper limit was set by AVX during the pre-construction phase of the system based simply on the boiling points of the solvents used in the chip manufacturing department and at a time when chip production was at a much higher rate than it is today. Desorber temperatures above 500 degrees F are normal and beneficial for the AVX device. At higher temperatures the engineered carbon pore volume increases providing more capacity in the adsorption cycle. AVX is requesting that the upper permit limit be revised to 650 degrees F.

Regarding the lower temperature limit, the AVX Myrtle Beach facility has much lower production levels than when the control system was originally installed. Most deviations below the 350 degree F lower limit occur during system ramp up, prior to chip manufacturing startup. The systems are shut down to conserve energy on weekends or possibly weekdays when there is no chip manufacturing. AVX is requesting the addition of permit language that the desorbers be operated within the temperature limits "during capacitor manufacturing."

### 2.5 CMAP Support Department (Unit ID 18)

CMAP Support consists of a number of processes that support the CMAP buildup activities.

- Glass buildup plate preparation
- Dicing operations
- Chip removal
- Green chip corner rounding
- Chip drying (moisture removal)
- Formation of cured ceramic chip body (burnout and firing)

The glass plates used in the CMAP buildup process are prepared in CMAP Support by water washing, drying, and applying a release paper or plastic film to the plate. This is the surface onto which the buildup of ceramic slip and electrode ink occurs in CMAP buildup process and allows for easy removal of the individual chips after dicing.

Once the ceramic and electrode ink layers have been created on the glass plates, the ceramic buildup is cut or "diced" into predetermined shapes and sizes to form individual capacitor

chips. The majority of dicing is accomplished using a wet process where there are no emissions. For certain product lines, dicing is completed using a dry process that results in a small amount of PM.

Emissions from CMAP Support include VOC from cleaning solvents and PM from the dry dicing operations. Spent cleaning solvent waste is collected and removed from CMAP Support. Baghouses are used to control PM emissions from dry dicing.

The individual capacitors created from dicing are known as "green" chips prior to the burn out and sintering steps. In the green chip area, chips are sorted, washed, dried at low temperatures, and corner rounded. The average time chips spend in this area is 5.5 days. AVX contends that no volatile organic compounds (HAP/TAP) are present in the chips after this process step when entering the Kiln Room. A small amount organic material is present in the binder removed from the chips during the burn out ovens.

CMAP Support includes the Kiln Room, which contains electric burn out ovens and firing kiln ovens. The green chips enter burnout ovens to remove electrode ink binder material prior to ceramic firing. The burnout cycle time ranges from about 24 hours to as high as 30 hours with temperatures peaking at around 500 degrees F in inert and oxidizing atmospheres. After the binder material is evacuated from the chips, they enter the kilns to fire and cure (sinter) the ceramic. Average firing cycle time is 33 hours reaching a maximum temperature of 2300 degrees F.

On June 25, 2009, AVX conducted carbon sampling from an exhaust of one of the burn out ovens. The test indicated a small amount of VOC (as carbon) emissions during this processing step. Based on these results, AVX contends that all organic material is vacated from the chips during burn out and, therefore, the kilns are sources of heat emissions only.

To simplify the revised permit, the burnout ovens will be considered as part of the CMAP Support department. Therefore, the Kiln Room will no longer be a separate emission unit.

### 2.6 Metallization Department (Unit 19)

Metallization Department operations include the chip termination and plating processes. Previously, Termination and Plating Departments were separate emission units. To streamline the AVX Title V permit, these departments have been combined.

### 2.6.1 Termination

The termination process is the application of metal paste to capacitor chips to make the connection to the internal electrode layers. After application of the termination paste, the chips are fired on a time-temperature profile to bond the paste material to the electrode end of the capacitor. VOC in the termination paste are emitted during the application and curing and exhausted through room exhausts. VOC and HAP emissions also result from solvents used to clean the equipment. Xylene is one of the solvents used for cleaning. AVX is in the process of replacing xylene used for cleaning in the termination area with propylpionate, a non-HAP organic.

Termination is currently located in the main MB1 building. AVX is considering moving the equipment into MB2 to move towards decommissioning the building. The timeframe for the move is currently unclear. For future permitting flexibility, toxic air pollutant emissions from termination cleaning have been modeled at both the current and MB2 locations.

### 2.6.1 Plating

Following termination, the electrode layer connections are then plated to provide a surface suited for solder application for product quality. This department is currently permitted to operate five Autoline Barrel platers, a gold plating line, and three RFT batch plating processes. The 6-position Autoline plating operations have been removed from the Myrtle Beach facility. Similarly, the RFT platers are no longer in operation. Spouted Bed Electrode (SBE), Fine Copper Termination (FCT), and BCB coating processes will remain in their present location for the foreseeable future. Small amounts of particulate matter, nickel, and lead are potentially emitted from the plating solutions in two of the SBE lines and the Autoline.

### 2.7 Supporting Processes (Unit ID 21)

In addition to the processes listed above there are a number of other activities at AVX that support the manufacturing processes. Equipment such a boiler, soldering pots, and ground water air stripping emit small amounts of criteria pollutants and HAP and are included in the Miscellaneous Support source group.

### 2.8 Trivial and Insignificant Activities

In addition to the equipment described above, there are several processes which are categorized as insignificant per classification in the Title V regulations. This includes emergency generators, small boilers, a fire water pump, laboratory equipment, and R&D.

### 3. Emission Calculations

Several different emission calculation methodologies were utilized to estimate potential emissions from AVX processes. These procedures include: material mass balance, engineering estimates, AP-42 emission factors, and permit limits. The following sections provide a brief description of emission calculations. Complete documentation is contained in Appendix C.

### 3.1 Material Mass Balance Calculations

A number of emissions, especially VOC from solvent use, were estimated using mass balance calculations. For emission calculations based on actual solvent usage data, potential emissions were calculated from 2006 usages plus 15 percent. Calendar year 2006 is representative of current material usage.

As discussed previously, emissions from solvent usage vary from 100% loss to either 10% or 20% loss, depending on the material. The emission factors are based on material usage to meet product specifications, rework, and waste recovery. Manufacturing to viscosity specifications (when including rework and waste), less than 1% by weight of many solvents is lost from the balance (See Appendix G). For this renewal application, AVX is electing to continue to use the more conservative 10% and 20% loss factors previously established between AVX and DHEC for the Slip, Metals, and Metallization departments.

Solvent emissions from CMAP have been calculated based on a maximum amount of slip and metal paste used per machine based on a conservative application rate of 70 kg/day/machine. AVX estimates that 70% of the slip used in the buildup process is applied to the chips and 15% returns back as material reclaim. Of the 70% applied to the chips, 1% is emitted at the machines fugitive and 0.05% is emitted as a fugitive after production (green chip area). The average VOC content of slip is 30.32%, as determined from a sampling of typical slip formulations. A February 26, 2009 source test demonstrated that a 5,000 acfm adsorber/desorber and thermal oxidizer control system achieves an overall control efficiency of 99.5%. It is estimated that 85%

of the organic material in the slip, successfully applied to the plates, enters the control system. However, the CMAP machines cannot operate 24 hours per day, 7 days per week. CMAP is a batch process and not continuous. Between batches, the machines are cleaned, doctor blades calibrated, screens changed and aligned, plates loaded/unloaded, raw material changed out, etc. Also, the facility runs multiple job orders within a batch. The job orders typically do not fill up a machine. For example, January through July of 2010, the fill percentage ran approximately 80%. In other words, 20% of a machine was empty. Therefore, a maximum worse-case operation ratio of 32/48 hours has been used to estimate potential emissions.

Once the move of capacitor manufacturing from the original manufacturing location (old MB1) to the new manufacturing building is complete, AVX will have 24 CMAP machines in operation. For 2010, two CMAP machines will remain in MB1 until the medical qualification process is complete, which will allow the relocation of these machines. In anticipation of this application, sufficient inventory was produced that these machines should be idle through the 2010 qualification process. The machines need to remain online in the event that inventory is depleted before the qualification process is complete. AVX has requested an operating limit of 864 hours per year to limit emissions from these two machines. This is based on a conservative need with 2 machines operating 24 hours per day, 3 days per month, for 6 months.

Solvent emissions from the termination department were calculated based on the amount of termination paste used, its solvent content, minus the amount collected for reclaim or as waste. A worst case termination paste was used to estimate the maximum amount of VOC emitted. A 20% emission factor was used for the cleaning solvent emissions.

Lastly, the dicer emissions were calculated on a mass balance basis. The amount of material collected in the baghouse was measured and the amount emitted is back calculated from the amount of material collected in the baghouse and the control efficiency.

### 3.2 AP-42 Emission Factors

The USEPA AP-42, Volume I, Fifth Edition was used as a source of emission factors where material balance or other emission estimation methodologies were not applicable or available. Particulate matter emissions were determined using AP-42, Chapter 11 Mineral Products Industry emission factors for cement bin loading. It was assumed that the particle size of cement is similar to that of the ceramic materials processed in Raw Materials. Emissions from the boiler and emergency generators were estimated from the maximum firing rate, annual fuel use and emission factors from AP-42, for Natural Gas-Fired Small Boilers and for Uncontrolled Gasoline and Diesel Industrial Engines, respectively. Similarly, electroplating emissions were calculated based on emission factors and guidance provided in AP-42, Chapter 12 Metallurgical Industry Electroplating.

### 3.3 Other Emission Sources

Potential emissions for the groundwater air stripping tower were provided by Arcadis. Emissions were estimated using a modeling system as part of a design to install a like-for-like replacement of the larger stripping tower.

### 4. Regulatory Applicability Analysis

A key objective of a Title V operating permit application is to compile all applicable Clean Air Act derived requirements into one document. Conceptually, these requirements can be categorized as (1) emission limits and work practice standards, or (2) testing, monitoring, recordkeeping, or reporting requirements. To compile a list of all the requirements for which a facility must comply, it is first necessary to determine which federal and state air regulations apply to the facility as a whole or to individual emission units. Details for several regulations are presented below.

### 4.1 Federal Regulatory Applicability

Federal air quality regulations reviewed included New Source Performance Standards (NSPS, codified at 40 CFR 60), National Emission Standards for Hazardous Air Pollutants (NESHAP, codified at 40 CFR 63), Compliance Assurance Monitoring (CAM, codified at 40 CFR Part 64), and stratospheric ozone protection regulations (codified at 40 CFR 82). Applicable regulations are summarized in this section.

### 4.1.1 NSPS Subpart A, General Provisions

The General Provisions of 40 CFR Part 60, New Source Performance Standards, apply to any source subject to Subpart of the regulation. As described in more detail in the following section, AVX Boiler B201 is subject to NSPS Subpart A, Subpart Dc. The general provisions require written notification regarding construction, startup, and any physical or operational change resulting in an emissions increase. AVX complied with these notification requirements on March 16, 1999. NSPS also requires record keeping of any startups, shutdowns, or malfunctions of the boiler. The amount of fuel combusted monthly must be recorded and maintained onsite for two years. However, per S.C. Regulation 61-62.70.6 Title V sources must keep records for a period of at least five years. Compliance is shown with performance tests required by 40 CFR 60.8. Finally, AVX must operate the unit in a manner consistent with good air pollution control

practices. AVX complies with this regulation through maintaining fuel combustion records and recording startups, shutdowns, or malfunctions of the boiler.

### 4.1.2 NSPS Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units

NSPS Subpart Dc applies to steam generating units with design heat input rates between 10 and 100 MMBtu/hr installed after June 9, 1989. Since B201 is a natural-gas fired boiler with a design heat input of 16.738 MMBtu/hr and was installed in 1999, Subpart Dc applies in addition to the General Provisions of NSPS. Since B201 only fires natural gas, compliance with Subpart Dc only requires monthly fuel consumption records, which must be maintained for a minimum of two years.

### 4.1.3 Part 63 NESHAP Applicability (Subparts A & B)

National Emissions Standards for Hazardous Air Pollutants (NESHAP) are applicable to facilities that are in a regulated source category or are a major and areas source of HAP. Major source status is defined as having potential emissions in excess of 25 tons per year for total HAP and/or potential emissions in excess of 10 tons per year for any individual HAP. Area sources are HAP emission sources that are not major. AVX had HAP emissions above the major source thresholds. May 2000, AVX submitted a NESHAP 112(g) Case-by-Case Maximum Achievable Control Technology (MACT) determination for emissions from chip manufacturing at the New Manufacturing Facility. More recently, with production decreases, material replacement changes, and removal of 2-butoxyethanol from the federal HAP list, AVX is no longer a major source of HAP. However, with the USEPA's May 16, 1995 interpretation guidance of the general provisions of 40 CFR 63 and Section 112 of the Clean Air Act, a facility that was once a major source of HAP emissions, will always be considered major and must continue to comply with applicable requirements. This guidance is more commonly referred to as the "once in, always in" policy. On December 21, 2006, the USEPA proposed, in essence, a reversal of this policy, however, this proposal has not been finalized. As a result, AVX currently remains classified as a major source.

The USEPA published the final 40 CFR Part 63, Subpart ZZZZ, NESHAP for Reciprocating Internal Combustion Engines (RICE MACT) on March 3, 2010. The rule applies to both major and area sources of HAP. This rule is applicable to AVX's four diesel-fired emergency generators. They are defined as affected, existing source with compliance required by May 3, 2013.

AVX's SBE electroplating operations are also subject to 40 CFR Part 63, Subpart WWWWWW, NESHAP for Area Source Standards for Plating and Polishing Operations published March 14, 2008. AVX uses the wetting agent/fume suppressant compliance option in the baths of the affected tanks containing lead and nickel [§63.11490(a)]. AVX also has implemented the regulation's required management practices of minimizing bath agitation, maximizing drip time, minimize solution drag out, cover tanks when not in use, minimize tank temperatures, perform regular repair and maintenance, conduct bath stability measurements frequently, as well as perform other routine inspections and maintenance for pollution prevention.

### 4.1.4 Part 64 Compliance Assurance Monitoring

Compliance assurance monitoring (CAM) applies to pollutant specific emission units (PSEU) located at major sources that meet the following criteria:

- a. The PSEU is subject to an emission limit or standard, and
- b. The PSEU uses a control device to achieve compliance, and
- c. Potential pre-control emissions from the PSEU are equal to or exceed 100% of the major source threshold.

CMAP (Unit ID 17) utilizes a control device to limit VOC emission from the process and has a potential to emit 116.5 of VOC pre-control, which exceeds 100% of the major source threshold (applicability item c). The manufacturing building that includes the CMAP process currently has a Prevention of Significant Deterioration (PSD) Synthetic Minor VOC emission limit of 39.5 tons per year. As discussed in more detail in Section 4.3, AVX is formally requesting removal of this limit from the operating permit for flexibility purposes. However, as discussed in Section 4.1.3, AVX is a major source under the "once in, always in" policy. Therefore the CMAP control system, as part of the 112(g) Case-by-Case determination, is required to remain and operate as

originally applied. Therefore, AVX has included with this application a CAM Plan as required by the CAM Rule for major source operating permit renewal applications.

The only other control devices at AVX are fabric filters. The potential to emit pre-control emissions for the associated units are below Title V trigger levels, and are therefore not subject to CAM.

### 4.1.5 Part 82, Subpart F Stratospheric Ozone Protection Regulations

40 CFR 82, Stratospheric Ozone Protection, applies to the maintenance of refrigeration equipment at this facility that contains ozone-depleting substances. AVX's personnel responsible for air condition maintenance have been properly trained and certified as required by this regulation.

### 4.2 South Carolina Regulations

South Carolina air quality regulations fall under two main categories: those regulations that are generally applicable (e.g., permitting requirements), and those that are specifically applicable to an emission unit (e.g., PM standards for manufacturing equipment). The generally applicable requirements are straightforward (e.g., filing of emission statements) and, as such, are not discussed in further detail. The specific requirements associated with several regulations are discussed following.

### 4.2.1 62.5 Standard 1, Emissions From Fuel Burning Operations

This regulation applies to fuel burning devices such as furnaces and boilers, and sets limits on opacity, PM emissions, and SO<sub>2</sub> emissions. All fuel burning equipment at the facility is subject to the opacity requirements in Section I - visible emissions, except for the VOC control equipment (see section 4.2.3). Boiler B201 is subject to pollutant specific regulations as well. Because the boiler is natural gas-fired, AVX expects to comply with all requirements, namely visible emissions (Section I), PM emissions (Section II), and emissions of sulfur dioxide (SO<sub>2</sub>)

(Section III, Number 3). Opacity monitoring requirements detailed in Section IV, periodic testing requirements under Section VI, and source testing requirements under Section VII do not apply because all fuel burning equipment at the facility fire natural gas only. AVX is required to observe for visible emissions (opacity) and record in a Daily Inspection Log.

### 4.2.2 62.5 Standard 2, Ambient Air Quality Standards

Standard 2 establishes ambient air quality standards for all criteria pollutants. AVX is required to demonstrate compliance with this regulation when a physical modification is being proposed that would lead to an increase in emissions. AVX is consolidating CMAP, CMAP Support, and Termination. Plating will remain at its current location in MB1, however, the Autoline will be decommissioned some time in 2011. At that point, all plating will be accomplished using the SBE and FCT plating processes. With the AVX consolidation, criteria pollutant emissions will decrease, however, some changes in physical emission points will result. Therefore, worse case emissions of criteria pollutants are included in the air dispersion modeling analysis attached to this Title V renewal application (Appendix F).

### 4.2.3 62.5 Standard 3, Waste Combustion and Reduction

This standard limits PM emissions and opacity and applies to combustion of material other than virgin fuels. This standard applies to the VOC control system, which incinerates the VOC stream from CMAP operations. The PM limit is 0.5 lb/MMBtu of heat input and the opacity limit is 20%. Because the thermal oxidizer runs on natural gas, a clean burning fuel, it is not anticipated that these limits will be exceeded during normal operations of this equipment. With proper operation the combustion of VOC will not contribute substantially to PM emissions or opacity. Proper operation is ensured through daily continuous monitoring of the thermal oxidizer temperature.

### 4.2.4 62.5 Standard 4, Emissions From Process Industries

This standard limits PM emissions and opacity and applies to process industries. All equipment groups at AVX not subject to Standard 1 or Standard 3 are subject to Section VIII (Other Manufacturing) of this regulation. Equipment groups at AVX subject to this standard include the dicers, metals mixer, RMM grinders and mills, RMM mixers, and the slip manufacturing mixers.

Standard 4 limit units in the applicable groups to the PM emissions calculated using the process weight rule. The supporting emission rate calculations included in this application compare AVX emissions to Standard 4 limits. All calculated emissions are below these limits. Any deviations of department's design material throughput in this renewal application from the original Title V permit are the result of reductions in equipment. RMM, however, has the same design throughput of 4,000,000 pound per year as in the original Title V permit since the frontend, bulk material equipment are still in operation. Standard 4 requires that any unit constructed or modified after December 31, 1995 is subject to a 20% opacity limit. All other units constructed before December 3 1, 1995 are subject to a 40% opacity limit.

### 4.2.5 62.5 Standards 5.1, VOC Emissions Control and LAER

Standard No. 5.1, Lowest Achievable Emission Rate Applicable to Volatile Organic Compounds (LAER), will apply if AVX's net VOC emissions increase due to any future modification, exceeds 100 tons per year. A net VOC emissions increase refers to the actual increase in the potential to emit of a source due to a modification plus any other creditable increases and decreases that have occurred at the plant since July 1, 1979.

AVX has a public record 1979 VOC emission baseline of 608 tons per year. As presented in this Title V renewal application, AVX's has had progressive reductions in VOC emissions at Myrtle Beach since the baseline year. Factors for emission reduction include production decreases, improved efficiency, and material substitution changes. The facility has eliminated the uses of materials such as trichloroethylene (TCE) and significantly reduced usage of xylene. In

addition, with the consolidation of the manufacturing, more organic emissions will be destroyed by the adsorber/desorber/thermal oxidizer air pollution control system. Therefore, no units at AVX are currently subject to LAER. The current permitted potential to emit is 285 tons per year, based on a 2001 Title V renewal application. This renewal application revises the potential to emit to 61 tons per year.

### 4.2.5 62.5 Standard 8, Toxic Air Pollutants

This standard regulates ambient impacts associated with emissions of toxic air pollutants (TAP). AVX is required to demonstrate compliance with this regulation when a physical modification is being proposed that would lead to an increase in emissions or change the physical parameters which previous modeled concentrations were based. The consolidation will change the distribution of emissions of TAPs at AVX. Therefore, a facility-wide TAP modeling analysis is included with this Title V renewal application.

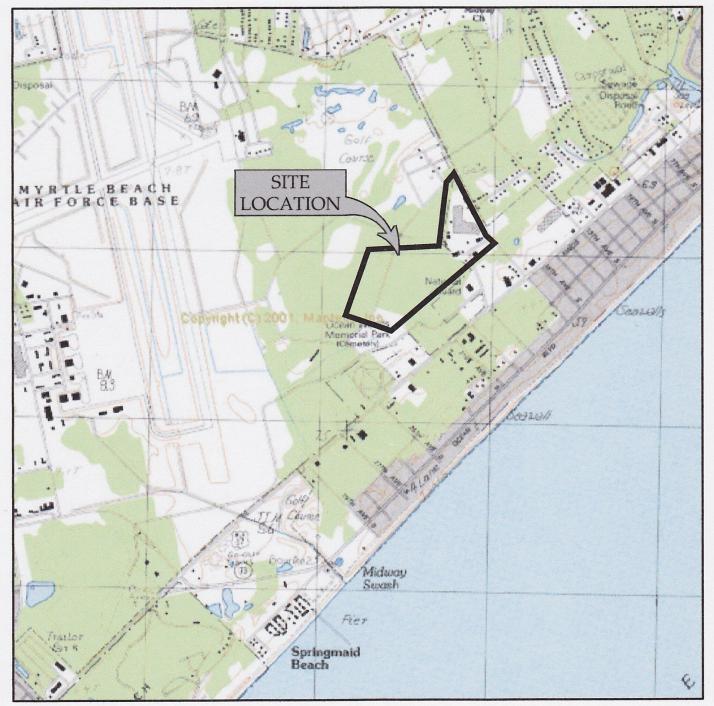
### 4.3 State Operating Permit Conditions

In addition to state and federal regulations, AVX is subject to existing state permit conditions. Most conditions reflect state or federal regulations discussed above. One condition in the current operating permit is a PSD Synthetic Minor limit of 39.5 tons per year of VOC emissions on the New Manufacturing Facility. This building will soon contain the consolidated manufacturing equipment, which includes the chip manufacturing VOC abatement system. The 39.5 ton per year limit was established to permit the construction of the new building while avoiding PSD review (construction permit #1340-0002-CS and CT). At the time of permitting the building, the original Tile V permit documented AVX's VOC potential to emit greater than the PSD major applicability threshold of 250 tons per year [52.21(1)(b)]. The 2004 Title V operating permit indicates a potential facility-wide VOC emission rate of 282.88 tons per year. As stated previously, the potential emission rates presented in the earlier Title V applications were based on anticipated (future) equipment needs required for expected production levels. AVX never installed the quantity of equipment permitted as product demand did not reach such anticipated levels. There are no records indicating that actual VOC emissions from the facility

have ever exceeded the 250 ton per year major source level. Therefore, AVX can be classified as a "true" PSD minor source. This Title V renewal application reflects the actual number of equipment at AVX and emissions are based on current materials and throughputs. As presented, the current potential, <u>uncontrolled</u> VOC emission rate is 172 tons per year. The potential controlled VOC emission rate is 60 tons per year. In an effort to consolidate, streamline, and introduce flexibility into the AVX operating permit, AVX is formally requesting that the SCDHEC remove of the 39.5 ton per year emission limit. Instead, AVX is proposing facility-wide PSD Synthetic Minor emission limit of less than 250 tons per year of VOC for any 12-month period. In retrospect, this facility-wide PSD avoidance limit should have been requested at the time of permitting the New Manufacturing Facility instead of the 39.5 ton per year limit.

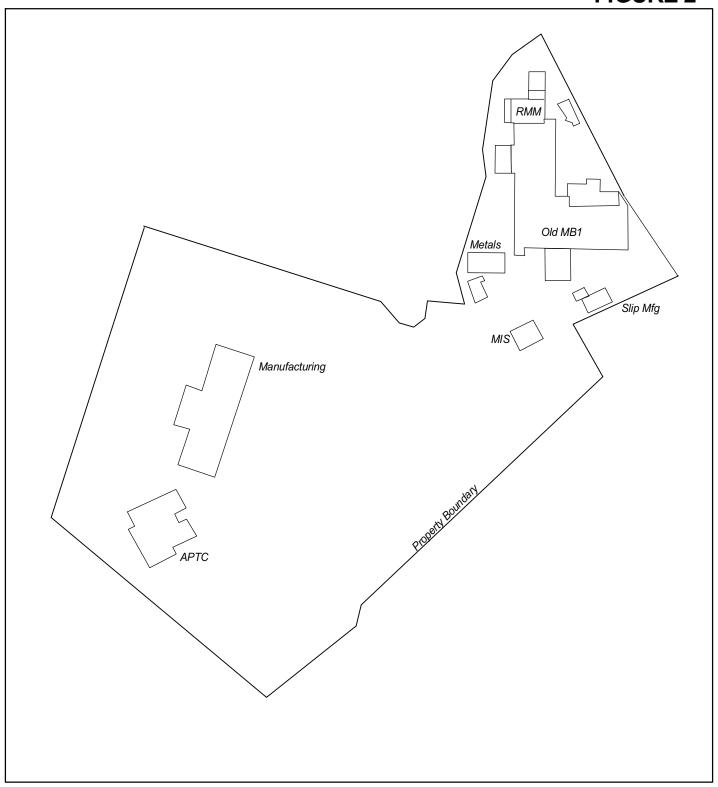
### **APPENDIX A**

Site Location and Facility Plot Plan





### FIGURE 2



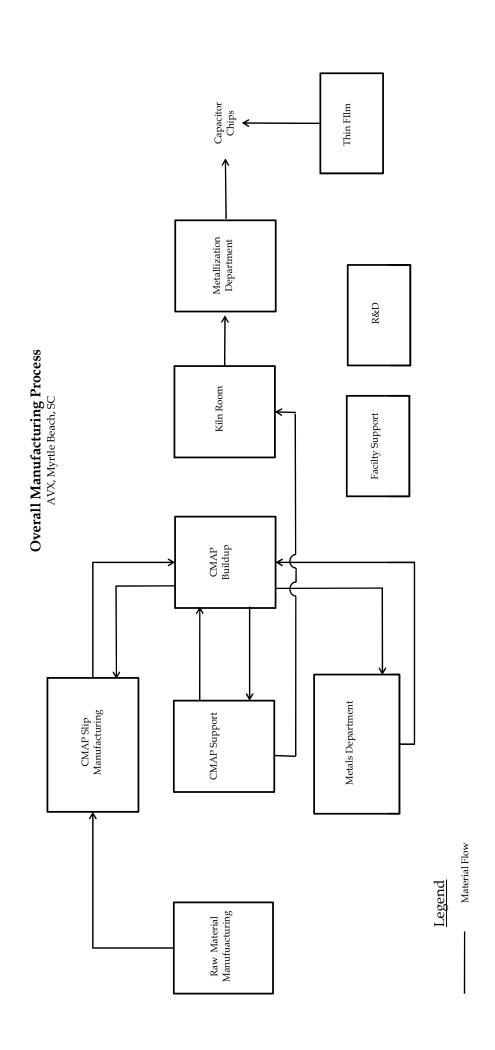
AVX CORPORATION MYRTLE BEACH, SC

**FACILITY PLOT PLAN** 

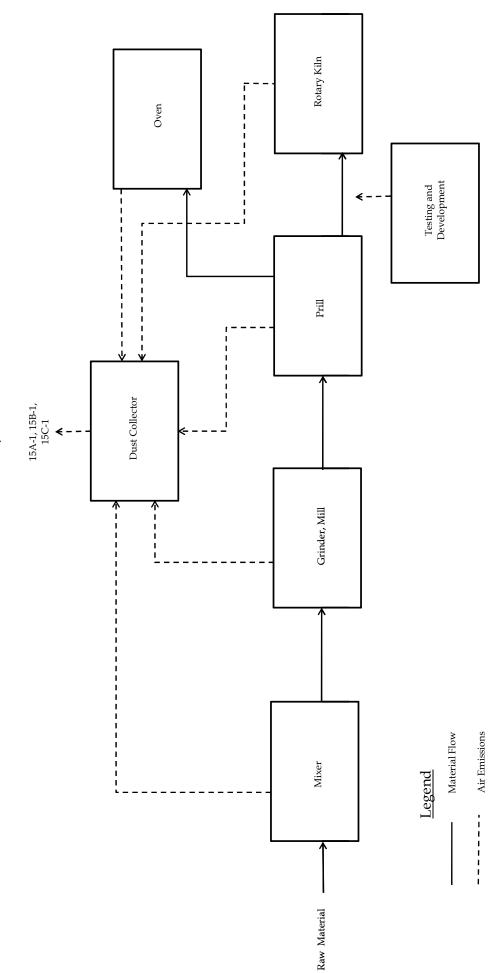


### **APPENDIX B**

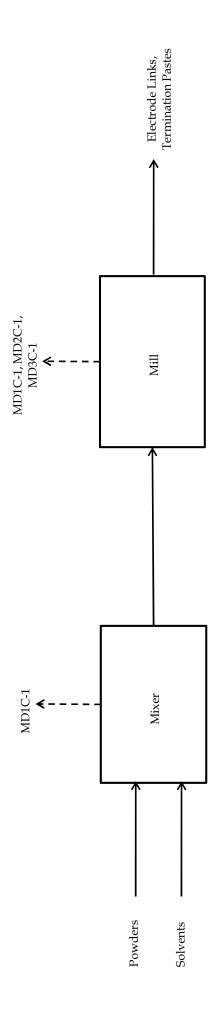
**Process Flow Diagrams** 



# Raw Material Manufuacturing - General Process AVX, Myrtle Beach, SC



### Metals Department AVX, Myrtle Beach, SC

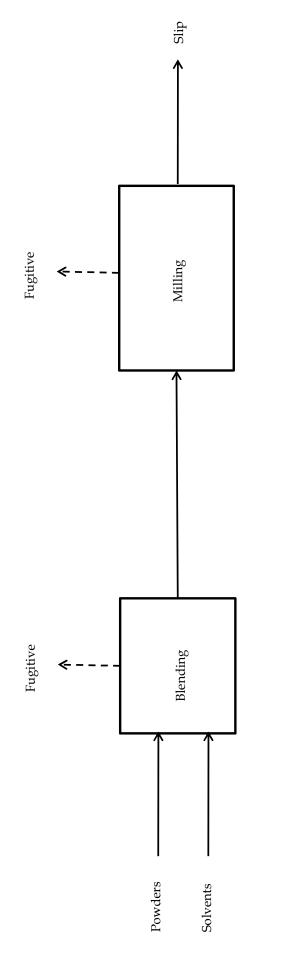


Legend

Material Flow

Air Emissions -----

## Slip Manufacturing AVX, Myrtle Beach, SC

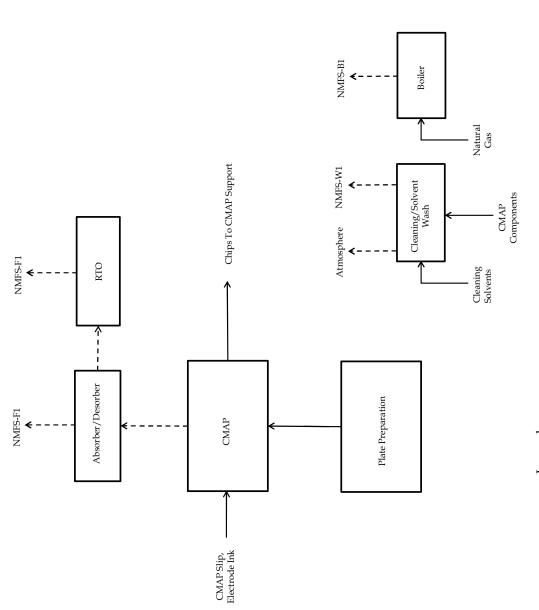


Legend

Material Flow

Air Emissions

CMAP AVX, Myrtle Beach, SC

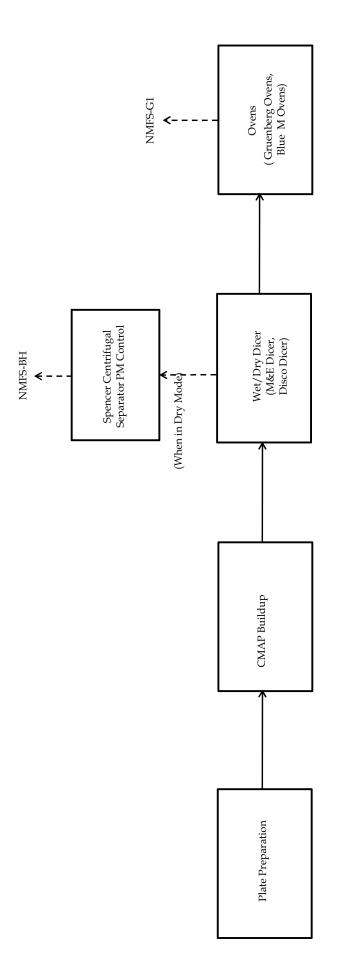


<u>Legend</u>

----- Material Flow

---- Air Emissions

CMAP Support AVX, Myrtle Beach, SC



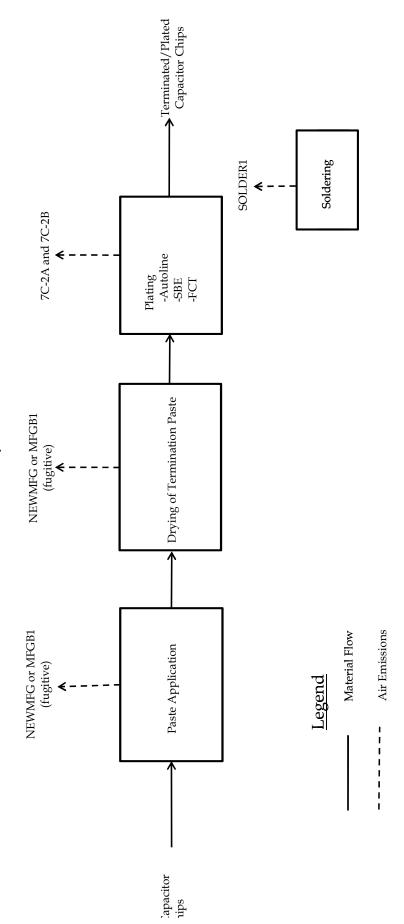
Legend

---- Material Flow

----- Air Emissions

## Metallization Department

AVX, Myrtle Beach, SC



#### **APPENDIX C**

**Equipment Identification** 

TABLE 1
Revised Title V Unit ID Cross Reference
AVX, Myrtle Beach, SC

Revised Title V Unit IDs	Department	Former Unit ID
UNIT 14	RMM	Unit 06
UNIT 15	Slip Mfg	Unit 04
UNIT 16	Metals	Unit 01
UNIT 17	CMAP Buildup	Unit 10
UNIT 18	CMAP Support	Unit 11
UNIT 19	Metallization	Unit 05
UNIT 20	Thin Film	Unit 13
UNIT 21	Misc Support	Unit 03
DELETE	Plating Department <sup>1</sup>	Unit 02
DELETE	MB1 CMAP Buildup <sup>2</sup>	Unit 07
DELETE	MB1 CMAP Support <sup>2</sup>	Unit 08
DELETE	MB1 Kiln Room <sup>2</sup>	Unit 09
DELETE	MB2 Kiln Room	Unit 12

#### Note:

- 1. 5 of 8 plating lines are insignificant. Moved into Unit 19
- 2. Manufacturing consolidation
- 3. CMAP Support now includes all burnout ovens

TABLE 2
Equipment Cross Reference - RMM
AVX Corporation, Myrtle Beach, SC

	Desc.	RMM																																													
	Unit No.	14																																													
													1								_													_	_												_
	Notes	Removed	Removed	Removed	Removed	Removed	Removed	In operation. Move to insignificant	In operation	In operation	In operation	In operation. Not exhausted. Enclosed	Removed	(2) pre-slury carts	Removed	Removed	Removed	Removed	Removed	Removed	Removed	Removed	In operation	In operation	In operation	In operation	In operation	2 In operation	In operation. Insignificant T&D furnace	In operation. Insignificant T&D fumace	In operation. Insignificant T&D fumace	In operation. 350,000 lb/yr	In operation. 350,000 lb/yr	Removed	Removed		In operation. No exhaust.	In operation. T&D	Removed	In operation.	6 In operation. 6 Removed	In operation. Wet process. No emissions	In operation. T&D	In operation	In operation	In operation	In operation. No exhaust.
	No. Units	-	1	2	-	-	-		-	-	-	-	-	က	-	1	1	1	1	1	-	-	1	1	1	1	-	4	1	-	1	2	2	2	9	EQUIPMENT	2	1	1	2	12	4	1	4	3	16	П
,	Additional Info.							exhausting heat	Prep of ceramic	Prep of ceramic	Prep of ceramic	1,000,000 lb/yr	1,000,000 lb/yr	to slurry mixes.	weighing/batching	weighing/batching	weighing/batching	weighing/batching	weighing/batching	weighing/batching	weighing/batching	1,100,000 lb/yr	300,000 lb/yr	300,000 lb/yr	100,000 lb/yr	300,000 lb/yr	300,000 lb/yr	400,000 lb/yr ea.	calcining/recalcining	calcining/recalcining	calcining/recalcining	700,000 lb/yr ea.	700,000 lb/yr ea.	PSD rated at 800		INSIGNIFICANT EQUI											
CURRENT	Equip. Desc.	VOID - Roller Hearth Kiln	VOID - Barium Chloride Tank	VOID - Mixing Tanks #1 & #2	VOID - Mixing Tank #3	VOID - Q320 Centrifuge	VOID - Barium Chloride Tank	Drying Ovens	Blender	Blender	Blender	Cone Screw Blender	Dynamic Air Mixer	Pre-Slurry Carts	Vat for BaCO3	Vat for BaCO3	Vat for Bismuth Titanate	Vat for lead bismuth titanate	Vat for lead niobate	Vat for lead	Vat for TiO2	Vat for Y832	Ceramic priller (3 pump)		Ceramic priller (1 pump)	Ceramic priller (3 pump)	Ceramic priller (3 pump)	Ceramic prillers (4 pump)	Rapid temp furnace	Rapid temp furnace	Rapid temp furnace	Prill Grinders	Prill Grinders	Sweco Mills	Sweco Mills		5 Chamber mill T&D	Blue M oven T&D	Lead blower	Blue M ovens	Blue M ovens	M18 Sweco Mill T&D	Ceramic priller	Rotary kiln - tape reclaim	Spex mixer mill T&D	Vertical kilns	Storage tank T&D
-			SG5	SG7 & SG8	SG9	SG10	SG13	DOA - DOK	BL1	B4	B5	CSB1	B6	RMMPS1 - RMMPS3	V1	N3	V8	V5	77	V2	V4		PR1	PR2	PR3	PR4	PR5	PR6 - PR9	RTF-1	RTF-2	RTF-3	G1 & G3	G4 & G5	M1 - M3	M/ - M12		CM-1 & CM-2	BMO-1	RMMLAB	RMM1 - 2	RMMA - L	M45-6 - M45-9	PLB	RK1 - RK4	SMM1 - SMM3	VK1 - VK16	AG1
-	Unit No. Unit Desc.	6 RMM																																													

REVISED TITLE V PERMIT	Equip. Desc.	r adding dry materials to slurry (3) Blenders, (3) Pre-slurry carts	rinding ceramic prills (4) Prill grinders	raking ceramic prills (8) Ceramic prillers	INSIGNIFICANT EQUIPMENT	ove detergent/ dispersant from material Drying ovens	ture furnaces in T&D Rapid Temperature Furnaces	; Tape shredders	ture remove in testing and development Blue M	Shall priller	Ins Rotary kilns	ng and development Spex mixers	.s Vertical kilns	E
REVISED TITLE V PERMIT	Equip. Desc.	6 Prep devices for adding dry materials to slurry	4 Machines for grinding ceramic prills	7 Machines for making ceramic prills	INSIGNIFICANT EQUIPA	11 Ovens to remove detergent/dispersant from material	3 Rapid temperature furnaces in T&D	2 Tape shredders	9 Ovens for moisture remove in testing and development	Festing and development priller	4 Small rotary kilns	3 Mixers in testing and development	16 Calcining kilns	1
	No. Units	9	4	7 7		11	3	2 2	6	1	4 4	3	16 1	1
		RMMPSC	RMIMPG	RMMPRILL		RMIMDO	RMMRTF	RMMTS	RMMOV	RMMTDP	RMMKILN	RMIMSPEX	RMMVK	DIVID
	Desc.	RMM												
	Unit No.	14												

TABLE 3
Equipment Cross Reference - Slip
AVX Corporation, Myrtle Beach, SC

REVISED T	Equip	19 Machines to mi	im of position 12	33 Maciniles to IIII	compo	AI II	Bioact clear	Fume	Lab oven and														
	Equip. ID No. Units	19		35			1	1	1														
	Equip. ID	SMILL		SMIX			BIOACT	SFH	SO														
	Unit Desc.	Slip Mfg.																					
	Unit No.	15																					
	Notes	Removed	2 Removed	In Operation	Removed	Removed	In Operation	In Operation	In Operation	(4) In operation	In Operation	Removed	Removed	Removed	n Operation	In Operation	.7 Tanks		In Operation	In Operation	In Operation	In Operation	In Operation. Emissions captured in dept.
	No. Units	3 I	2	1 1	1 1	1 1	1 1	1	1 1	3 (	11	1	I I	I I	I 2	I		MENT		I	I	1 1	1 1
CURRENT TITLE V PERMIT	Additional Info.	PSD 600 kg/day ea.	PSD 800 kg/day ea.	PSD 2400 kg/day	PSD 2400 kg/day	PSD 2400 kg/day	PSD 800 kg/day	PSD 800 kg/day	PSD 800 kg/day	PSD 800 kg/day ea.	PSD 800 kg/day ea.	Blend 2,400 kg/day	Blending 2,400	Blending 2,400	PSD 800 kg/day ea.	Blending 240 kg/day	adds solvent	INSIGNIFICANT EQUIPMENT			testing and dev	testing and dev	
CURRENT TIT	Equip. Desc.	Kady Zolvers#1 - #3	MC Dispersers #1 - #5	Netzsch Mill #1	Netzsch Mill #2	Netzsch Mill #3	Sweco M18 Mill #1	Sweco M18 Mill #2	Sweco M18 Mill #3	Sweco M18 Mills #4 - #6	Sweco M45 Mills #1 - #11	Kady Mill #1	Kady Mill #2	Kady Mill #3	MC Mixers #1 - #7	Armenco Vacuum Mixer	Stock pot mixers		Bioact 113 ultrasonic cleaner	Distillation Unit: Bioact	Fume hood	Small furnace fume hood	Support maintenance: cleaning
	αI	KMS1 - KMS3	MCD1 - MCD2	IWN	NM2	NM3	S1	S2	S3	S4 - S6	SG1 - SG11	KW1	KM2	EWN	MC1 - MC7	AVM1	SPM1		BA1	DU1	FG-3	FU-1	SM5
	Unit Desc.	Slip Mfg.																					
	Unit No.	4		-		-	-	-		-	-	-		-		-		-	-	-			
										-	_	_	_	_	_	_	_	_	_	_	_	_	_

				REVISED TITLE V PERMIT	
	Unit				
Init No.	Desc.	Equip. ID	Equip. ID No. Units	Equip. Desc.	Includes/Notes
15	Slip Mfg.	SMILL	19	19 Machines to mill ceramic material	(1) Netzsch, (17) Sweco
		SMIX	35	35 Machines to mix ceramic material components	(7) MC, (1) Armenco, (27) pot mixers
				INSIGNIFICANT EQUIPMENT	JIPMENT
		BIOACT	1	Bioact cleaning system	Bioact ultrasonic cleaner & distiller
		SFH	1	Fume hood	Fume hood
		OS:		Lab oven and firme hood	Lab oven firme hood

TABLE 4
Summary Of Potential Emissions
AVX Corporation, Myrtle Beach, SC

	Unit No.	16																																				Ī	
	Notes	Removed	In Operation	In Operation	In Operation	Removed	In Operation	In Operation	In Operation	In Operation	In Operation	Removed	Removed	In Operation	In Operation	In Operation	In Operation	In Operation	In Operation	In Operation		In Operation	Removed	In Operation	Removed	Removed													
	No. Units	1	T	1	1	1	1	1		3		I		3		1	1	1	1				0			1	1.0	12	C	7	1	5		2	2	2	3	T	
IT	Info.																																T EQUIPMENT	500 kg/day ea.	200 kg/day ea.		500 kg/day		
CURRENT TITLE V PERMIT	Equip. Desc.	Bead Mill (small)	Bead Mill (large)	Buhler Roll Mill #1	Buhler Roll Mill #2	Buhler Roll Mill #3	Dyno Mill	Kady Zolver #1	Kady Zolver #2	Kady Zolver #3	Three Roll Mill (large)		Three Roll Mill (large)	Three Roll Mill (small)	Air Mixer #1	Air Mixer #2	Air Mixer #3	Air Mixer #4	Air Mixer #5	Air Mixer #6	Armenco Vacuum Mixer	Hockmeyer Mixers #1 - #7	Hockmeyer Mixers #8 - #12	Meyers Mixer #1	Meyers Mixer #2	PD2 Mixer	Planetary Mixers #1 - #5	INSIGNIFICANT EQUIPMEN	S	(2) Centrifuges	(2) Fume hoods	Kyocera filter press	Metals maintenance						
	ID	BM-4	BM-5	BM-6	BM-7	BM-8	BM-9	BM-10	BRM-1	BRM-2	BKM-3	DM-1	KMS-1	KMS-2	KMS-3	TRM-1	TRM-2	TRM-3	TRM-4	AM-1	AM-2	AM-3	AM-4	AM-5	AM-6	AVM1	H-1 - H-7	H-8 - H-12	MM-1	MM-2	PD-2	HDM1 - HDM5		FP-1 & FP-2	CT-1 & CT-2	FH-1 & FH-2	FP-3	BA2	
	Unit Desc.	Metals																																					
	Jnit No.	1																																					

				REVISED TITLE V PERMIT	
Jnit No.	Desc.	Equip. ID	No. Units	Equip. Desc.	Includes/Notes
16	Metals	MMILL	8	8 Machines to mill electrode ink	(3) Buhler Roll, (3) Kady Zolver, (2) Three Roll
		MMIX	27	27 Machines to mix electrode inke components	(6) Air, (1) Armenco Vacuum, (12) Kockmeyer, (2) Meyers, (1) PD, (5) Planetary
				INSIGNIFICANT EQUIPMENT	UIPMENT
		MFP	2	2 Filter presses	Filter presses
		MPS	1	1 Pot storage room exhaust	Pot room exhaust
		MFH	2	2 Lab fume hoods	Lab fume hoods
		MSM	2	2 Solvent wash sinks	Solvent wash sinks
		MO	1	1 Lab oven	Lab oven

TABLE 5
Equipment Cross Reference - CMAP
AVX Corporation, Myrtle Beach, SC

		CUKKENT TITLE V PEKMIT	EKMIT			
Unit No. Unit Desc.	Œ	Equip. Desc.	Additional Info.	No. Units	Notes	Unit No. Unit Desc
7 Slip Mfg. MB1	C0 - C4	CMAP machine	1.8 million pcs/day	5	Linear SSBU & JH	17 CMAP Build
	52	CMAP machine	1.8 million pcs/day	1		
	9) (Ce	CMAP machine	1.8 million pcs/day	1		
	C2	CMAP machine	1.8 million pcs/day	1		
	8	CMAP machine	1.8 million pcs/day	1		
	60	CMAP machine	1.8 million pcs/day	1		
	C10	CMAP machine	1.8 million pcs/day	1		
	C11	CMAP machine	1.8 million pcs/day	1		
	C12 - C18	CMAP machine	1.8 million pcs/day	7		
	C19 - C27	CMAP machine	1.8 million pcs/day	6		
	C28 - C32	CMAP machine	1.8 million pcs/day	5		
	C33 - C36	CMAP machine	1.8 million pcs/day	4		
	C37	CMAP machine	1.8 million pcs/day	1		
	C38 - C40	CMAP machine	1.8 million pcs/day	3		
	C41 - C53	CMAP machine	1.8 million pcs/day	13		
	C54	CMAP machine	1.8 million pcs/day	1		
		INSIGNIE	NSIGNIFICANT EQUIPMENT			
	SRT1 - STR4	Screen Room Tables		4	In Operation	
	SRW1	Screen Wash station w/ acetone		1	In Operation. Remove: acetone	
	SW1 - SW3	Solvent wash sink		3	In Operation	
10 Slip Mfg. MB2	C200 - C207	CMAP Machine	1.8 million pcs/day	8		
	C208 - C215	CMAP Machine	1.8 million pcs/day	8		
	C216 - C223	CMAP Machine	1.8 million pcs/day	8		
	C224 - C231	CMAP Machine	1.8 million pcs/day	8		
	C232 - C239	VOID CMAP Machine		8	Remove	
	C240 - C247	VOID CMAP Machine		8	Remove	
		INSIGNIE	INSIGNIFICANT EQUIPMENT			
	JHC1	JHCMAP for chip fab.		1	Remove	
	SC1	SCMAP for chip fab.		1	Remove	

	Includes/Notes	(24) CMAP machines	(2) CMAP machines	T		1 w / acetone
REVISED TITLE V PERMIT	Equip. Desc.	24 Machines to manufacture capacitor chips (24) CMAP machines	2 Temporary CMAP machines	INSIGNIFICANT EQUIPMENT	Screen Room	(3) Screen Wash station w / acetone
	No. Units	24	2		1	33
	Equip. ID	CMAP	CMAPT		CSR	SMSJ
	Unit Desc.	CMAP Buildup				
	No.	7				

TABLE 6
Equipment Cross Reference - CMAP Support
AVX Corporation, Myrtle Beach, SC

	Unit No. Unit D	18 CMAP Si																																																							
	satoN	Removed	In operation. Move to insig	Removed	In operation Move to insig	Removed	Removed	MTO1 in operation. Move to insig	Removed	In operation	In operation	In operation	In operation	In operation	Removed	In operation	Removed	Kemoved	Kemoved	Kemoved	Removed	Kemoved	Kemoved	Kemoved	Kemoved		Kemove.	Kemoved	in Operation	Neuroved In Oroganian	III Operation	In operation. Move to insig	T. C.	In operation. Move to insig	In operation Move to insig.	ni operación more comisión		In operation.	In Operation		Removed	Removed	Removed	Removed	Removed	Removed	In operation, moving to MB2	In operation, moving to MB2	Removed	Removed	F	Kemoved	Removed	Removed	Removed	Removed	Removed
	No. Units	1	1	22		2	4	2	2	,	Ţ	1	1	1	1	1	1	1	2	1	1	_ ,	Τ.	٠,	ī							4	4	4	c -	2					œ	2	1	1	1	2	2	3	1	2	c	6 0	2	LC:	, [	1	1
MIT	Additional Info.	drying, 341 BTU/min	drying. 341 BTU/min	noisture removal	moisture removal.	moisture removal.	moisture removal.	Thermal release oven	hermal release oven	.2 million pcs/day	9.2 million pcs/day	.2 million pcs/day	9.2 million pcs/day	9.2 million pcs/day	9.2 million pcs/day	.2 million pcs/day	9.2 million pcs/day	9.2 million pcs/day	.2 million pcs/day	9.2 million pcs/day	ICANI EQUIPMENI											INSIGNIFICANT EQUIPMENT	,			512 BTU/min ea.	512 BTU/min ea.	341 BTU/min	342 BTU/min	343 BTU/min	344 BTU/min ea	682 BTU/min ea.	682 BTU/min ea.	1,366 BTU/min	,366 BTU/min	1 366 BTI I/min	,366 B1U/min	,366 B1U/min	1.366 BTU/min	1,366 BTU/min	1,366 BTU/min	,366 BTU/min					
CURRENT TITLE V PERMIT	Equip. Desc.	-336G-3	-336G-3	Г	Gruenberg Post Bake Oven		Oven	1	n3 T		2 0	5						6							M&E Dicer	2	Diade cleaning with acetone	Nitte applicator	Summert maint algebra cleaning	Tothin manor amplicator	resuri paper appucator	Blue M Oven TA662G-1	Disco Dicer	Gruenberg Ovens	Linear Dryers	MTI Dicer		Blade Cleaning w/ acetone	Nitto Paper Applicator						Blue M Oven POM-7-336F				Gruenberg Oven C135H1M				Gruenberg Oven C135H1M	Gnienberg Oven C135H1M		Gruenberg Oven C135H1M	
	ΩI	D1	D2	CD1 - CD22	GPBO-1 - GPBO-7	GPBO-11 - GPBO-12	GPBO-13 - GPBO-16	MTO1 & MTO2	MTO3 & MTO4	DD-I	DD-2	DD-3	DD-4	DD-5	9-DD	GS-I	GS-2	GS-4	6-S5 % GS-6	cs:/	65-8	6-SD	GS-10	11.65	GS-12	100	PCI	N'A!	SM1	TAI	IVI	BM-202 - BM-205	DD-7 - DD-110	GB232 - GB239	1D4	MTI-201 & MTI-202		BC2	NA2	RA8 - RA13. RA29 &		RA34 & RA37					01	,L07		GB2 & GB3		000		GB43 & GB46			
	Unit Desc.	CMAP Supp. MB1													•		•	•	•	- 1		•		•								CMAP Supp. MB2									Kiln Room MB1												•		•		_
	Unit No.	8																														11									6																

				KEVISED IIILE V FEKMII	
Unit No.	Unit Desc. Equip. ID No. Units	Equip. ID	No. Units	Equip. Desc.	Includes/Notes
18	CMAP Support	DD	2	5 Machines for dry dicing chips	Disco, M&E gang saw
				INSIGNIFICANT EQUIPMENT	AENT
		BO	36	36 Ovens for chip binder burnout	(30) Gruenberg, (2) Sierra Therm, (1) Nitrogen
		FK	24	Firing Kilns	(9) Cladan, (6) Harper, (9) Tokai
		OSO	16	16 Low temperature moisture removal ovens	Gruenberg (Blue M) and pre-dice
		SOSO	1	Blade cleaning station	Cleaning station
		CSPA	2	2 Machines for adding paper to plates	(1) Nitto, (1) Bilco
		CSCD	2	2 Chip dryers	(1) green corner rounding, (1) post fire
		CSTR	1	1 Thermal release ovens	Microtech

	Notes	Kemoved	Kemoved	Removed	Removed	Removed	Removed	Removed	HA1 - 6 in operation. HA7 Removed	Removed	N14 in operation. N13 Removed.	In operation	TK1 - 3 in operation.	Removed	In operation	NNE5 and 6 in operation.	Removed	Removed	Removed	In operation. Add to Unit ID 21	Remove - No cleaning tracked.	Removed	In operation	Removed	Removed	Removed	Removed	Removed	Removed																				
	No. Units	3	16	20	1	1	1	1	1	1	1	2	2	4	1	50	3	1	2	1	2	2	7	1	2	1	9	2	4	5	1	4	1		1	1	7	1	7	1	7	1	7	49	1	2	2	9	9
	Additional Into.	1,366 BTU/min	1,366 B1U/min	1,366 BTU/min	13,298 BTU/min	13,298 BTU/min	13,298 BTU/min	13,298 BTU/min	13,298 BTU/min	13,298 BTU/min	13,298 BTU/min	3,182 BTU/min ea.		10,415 BTU/min ea.	10,415 BTU/min ea.	63 KVA ea.	63 KVA ea.	2,557 BTU/min	2,557 BTU/min	2,557 BTU/min	13.4 MMBtu/hr, Subpart Dc	cleaning	325 BTU/min	1,366 BTU/min	1,366 BTU/min	1,366 BTU/min	1,366 BTU/min	1,366 BTU/min	1,366 BTU/min	1,366 BTU/min	1,366 BTU/min	10,415 BTU/min	10,415 BTU/min	10,415 BTU/min	65 KVA	66 KVA													
CURRENT TITLE V PERMIT	Equip. Desc.	Gruenberg Oven C135H1M	Harper Double Hearth Kiln	Harper Double Hearth Kiln	Sierra Therm oven 2k26-91C69-7AN	Sierra Therm oven 2k26-91C69-7AN	Tokai Continuous Kiln	Tokai Continuous Kiln	Tokai Non-Noble Kiln	Tokai Non-Noble Kiln	WJ Oven 12CA-87	WJ Oven 12CA-87	WJ Oven 12CA-87	MB2 Boiler	Support Maintenance	Blue M Oven TA662G-1	Gruenberg Ovens C135H11M	Tokai Continuous Kiln	Tokai Continuous Kiln	Tokai Continuous Kiln	Tokai Non-Noble Kiln	Tokai Non-Noble Kiln																											
	ID	GB60 - G62	GB63, GB65 - GB79	GB81 - GB99	GB100	GB101	GB102	GB111	GB112	GB113	GB114	GB115 & GB116	GB117 & GB120	GB126 - GB129	GB130	GB131 - GB180	GB182 - GB184	HA9	HA10 & HA11	HA12	HA15 & HA16	HA17 & HA18	HA1 - HA7	HA14	N13 & N14	N15	TK1 - TK5 & TK9	TK6 & TK7	NNE1 - NNE4	NNE5 - NNE9	N5	N7 - N10	N12	B201	SM2	BM-201	GB201 - GB207	GB208	GB209 - GB215	GB216	GB217 - GB223	GB224	GB225 - GB231	GB236 - GB284	TK1	TK2 & TK3	TK8 - TK12	NNE20 - NNE25	NNE26 - NNE31
	Umt Desc.	Kiln Koom MBI									•	•	•	•		•		•		•														Kiln Room MB2															
	Unit No.	6																																12															

## TABLE6 Equipment Cross Reference - CMAP Support AVX Corporation, Myrtle Beach, SC

**TABLE 7**Equipment Cross Reference - Metallization AVX Corporation, Myrtle Beach, SC

			CURRENT TITLE V PERMIT	ERMIT				
	:	f			No.	;		
Init No.	Unit Desc.	OII	Equip. Desc.	Additional Info.	Units	Notes	Unit No.	-
5	Termination	CS1 - CS5	Chipstar CS-325 Ovens #1 - #5	Ink drying 313 Btu/min ea.	5	In operation	19	Metal
		CS6 - CS15	Chipstar CS-325 Ovens #6 - #15	Ink drying 313 Btu/min ea.	10	In operation		
		9ISO	Chipstar CS-325 Oven #16	Ink drying 313 Btu/min	1	In operation		
		CS17 - CS24	Chipstar CS-325 Oven #17 - #24	Ink drying 313 Btu/min ea.	8	Remove		
		CS30	Chipstar CS-325 (Modified) Oven #30	Ink drying 313 Btu/min ea.	1	Remove		
		MGB	Gruenberg Oven L3-1H506	Moisture/organic removal 260	1	Remove		
		LK-1 - KL-4	Koyo-Lindburg Ovens #1 - #4	Copper term. 51.6 KVA ea.	4	Remove		
		YT-5	Koyo-Lindburg Ovens #5	Copper term. 51.6 KVA	1	Remove		
		KL-6	Koyo-Lindburg Ovens #6	Copper term. 51.6 KVA	1	In operation		
		KL-7 - KL-12	Koyo-Lindburg Ovens #7 - #12	Copper term. 51.6 KVA ea.	9	In operation		
		P20 - P24	Palomar 2007 Ovens	Ink drying 313 Btu/min ea.	9	Remove		
		P25 - P31	Palomar 2009 Ovens	Ink drying 313 Btu/min ea.	2	Remove		
		ST-8 - ST-10	Sierra Therm Ovens	silver term 56 KVA	3	Remove		
		SI-11	Sierra Therm Oven	silver term 56 KVA	1	Remove		
		ST-12 - ST-16	Sierra Therm Ovens	silver term 56 KVA	2	In operation		
		MJO	WJ Oven	Moisture/organic removal 260	1	In operation		
		WJ-7	WJ Oven 24CA-87	silver term 45 KVA	1	In operation		
		PO1	Palomar 2001 Modified Oven	Ink drying 313 Btu/min	1	In operation		
		PO2	Palomar 2009 Modified Oven	Ink drying 313 Btu/min	1	In operation		
		Id	Palomar 246 System	Ink drying 313 Btu/min	1	In operation		
		P2	Palomar 246 System	Ink drying 313 Btu/min	1	In operation		
		P3 & P4	Palomar 246 System	Ink drying 313 Btu/min	7	In operation		
		P5 & P6	Palomar 246 System	Ink drying 313 Btu/min	2	In operation		
		P7 - P9	Palomar 246 System	Ink drying 313 Btu/min	3	In operation		
		91d - 01d	Palomar 246 System	Ink drying 313 Btu/min	2	Remove		
		21A	Palomar 246 System	Ink drying 313 Btu/min	1	In operation		
		P18	Palomar 246 System	Ink drying 313 Btu/min	1	Remove		
			INSIGNIFIC	INSIGNIFICANT EQUIPMENT				
		L1 - L5	Lasers	260 kg/day	2	In operation		
		SW6 & SW7	Solvent wash stations		2	1 in operation		
2	Plating	A1	Autoline Barrel #1	Ni, Sn/Pb 276 barrel/day	1	Temporarily in operation		
		A2	Autoline Barrel #2	Ni, Sn/Pb 276 barrel/day	1	Remove		
		A3	Autoline Barrel #3	Ni, Sn/Pb 276 barrel/day	1	Remove		
		A4	Autoline Barrel #4	Ni, Sn/Pb 276 barrel/day	1	Remove		
		A5	Autoline Barrel #5	Ni, Sn/Pb 276 barrel/day	1	Remove		
		GP-1	Gold Plating	200 barrel/mo	1	Changing to SBE process		
		RF-1	RFT Plater #1	15 KVA	1	Remove		
		RF-2 RF-3	RFT Platers #2 & #3	15 KVA	2	Remove		
		RF-4	RFT Plater #4	15 KVA	1	Remove		
			INSIGNIFIC	INSIGNIFICANT EQUIPMENT				
		PL-1 - PL-6	Blue M ovens for moisture removal	Various btu/min	9	4 In operation		
		SS1 & SS2	Solder stations	260 kg/day	2	In operation		

				REVISED TITLE V PERMIT	
			No.		
Unit No.	Unit Desc.	Equip. ID	Units	Equip. Desc.	Includes/Notes
19	Metallization	TOOLI	20	20 Systems that apply termination paste to chips	(6) Palomar, (8) Chipstar, (6) Quicksilver
		TOVEN	6	9 Ovens to cure terminated chips	(6) Koyo-Lindburg, (3) Sierra Therm
		PBSBE	2	2 Ni/Sn/Pb SBE plating lines	(2) 95 L lines and (1) 130 L line
		AUTO	1	Autoline Barrel #1	Remain in operation through 2010
				INSIGNIFICANT EQUIPMENT	T EQUIPMENT
		SBE	3	3 SBE Plating lines	3 SBE Plating (Ni/Sn and Cu)
		BCB	2	2 BCB plating lines	BCB Plating
		FCT	1	1 FCT plating line	FCT Plating
		GPL	1	1 Manual gold plating line	Gold plating
		PDD	11	11 Plating dyers for moisture removal	Drying ovens
		PDO	1	1 plate drying oven for moisture removal	Oven for drying cleaned build up plates
		OO	1	1 Copper coupon oven	Oven for drying quality control coupon paste
		TL	2	5 Labeling lasers	Labeling lasers
		MSL	2	1 Solvent wash stations	1 Solvent wash stations

Table 8

Equipment Cross Reference - Thin Film Process AVX Corporation, Myrtle Beach, SC

REVISED TITLE V PERMIT		Equip. Desc.	Thin Film Process
EVISED TIT		Equip. ID No. Units	1
RI		Equip. ID	TFP
		Unit Desc.	Thin Film
		Unit No.	20
		Notes	
	No.	Units	1
TE V PERMIT		Additional Info.	
CURRENT TITLE V PERMIT		Equip. Desc.	Thin Film Process
			TFP
		Unit Desc.	Thin Film

		8	
	,	Includes/Note	
NEVISED TILLE VIEWILL		Equip. Desc.	Thin Film Process
	7. 11 14	No. Units	1
		Equip. ID   No. Units	$_{ m LLD}$
		Unit Desc.	Thin Film
		rit No.	20

TABLE 9
Equipment Cross Reference - Miscellaneous Support
AVX Corporation, Myrtle Beach, SC

	Includes/Not			8 total. 3 pots with	wave solder. 4 not														(5) Blue M ovens		
	Equip. Desc.	100 gpm Groundwater stripping tower	16.4 MMBtu/hr natural gas-fired boiler	1 Soldoning Stations (I of Publity Plating and OC)	4 Somering Stations (Lot Quainty, Flating, and QC)	INSIGNIFICANT EQUIPMENT	100 kW EG (Kiln Room)	260 kW EG (MIS)	600 kW EG (RMM)	565 kW EG (Sol Gel)	Diesel Fire Pump	0.392 MMBtu/hr Plating boiler	0.392 MMBtu/hr Plating boiler	0.776 MMBtu/hr Plating boiler	Cooling Tower 1	Cooling Tower 2A	Cooling Tower 2C	Lot quality DPA hood	Lot quality drying ovens		
	Equip. ID No. Units	1	1	V	‡		1	1	1	1	1	1	1	1	1	1	1	1	ഗ		
	Equip. ID	ST	B201	S	S		田	H2	E6	E7	DFP	B1	B2	B3	CT1	CTA	CIC	DPA	OÕT		
	Unit Desc.	Misc Support																			
	Unit No.	21																			
	C																				
	Notes	Removed	n operation	n operation.	n operation	n operation	Removed	Removed. Captured by dept.	n operation		n operation. Moved to Kiln Rm	n operation	n operation	n operation	n operation	n operation	n operation	Removed	Removed	Removed	n operation
No.		1 Removed	1 In operation	1 In operation.	1 In operation	1 In operation	1 Removed	1 Removed. Captured by dept.	1 In operation	T	1 In operation. Moved to Kiln Rm	1 In operation	1 In operation	1 In operation	1 In operation	1 In operation	1 In operation	1 Removed	1 Removed	1 Removed	1 In operation
No.	Notes	245 kW 1 Removed	260 kW 1 In operation	600kW 1 In operation.	565 kW In operation	100 gpm 1 In operation	1	5	1 In operation	NIFICANT EQUIPMENT	100 kW In operation. Moved to Kiln Rm	0.392 MMBtu/hr 1 In operation	1	0776 MMBtu/hr 1 In operation	1 In operation	1 In operation	1 In operation	0.998 MMBtu/hr 1 Removed	RをD   1   Removed	75 kW 1 Removed	87 kHz 1 In oneration
No.	Units Notes	1		1	1	1	1	5	13.4 MMBtu/hr Boiler 1 In operation	INSIGNIFICANT EQUIPMENT	1	1	1	1	1	Cooling Tower 2A 1 In operation	Cooling Tower 2C 1 In operation	1	1	1	

Unit No.	Unit Desc.	Equip. ID No. Units	No. Units	Equip. Desc.	Includes/Notes
21	Misc Support	$\operatorname{LS}$	1	100 gpm Groundwater stripping tower	
		B201	1	16.4 MMBtu/hr natural gas-fired boiler	
		SS	4	4 Soldering Stations (Lot Quality, Plating, and QC)	8 total. 3 pots with hoods, wave solder. 4 not vented
				INSIGNIFICANT EQUIPMENT	
		E1	1	100 kW EG (Kiln Room)	
		E5	T	260 kW EG (MIS)	
		E6	Ţ	600 kW EG (RMM)	
		E7	1	565 kW EG (Sol Gel)	
		DFP	1	Diesel Fire Pump	
		B1	T	0.392 MMBtu/hr Plating boiler	
		B2	1	0.392 MMBtu/hr Plating boiler	
		B3	1	0.776 MMBtu/hr Plating boiler	
		CT1	1	Cooling Tower 1	
		CTA	1	Cooling Tower 2A	
		CLC	1	Cooling Tower 2C	
		DPA	1	Lot quality DPA hood	
		ΓÕΟ	2	Lot quality drying ovens	(5) Blue M ovens

#### **APPENDIX D**

**Application Forms** 



#### **Title V Permit Application** Facility Profile - Form A **Bureau of Air Quality** Page 1 of 2



#### Please Refer to Instruction Pages Before Completing This Form When filling out forms on the computer, use only the tab key to move your cursor - do not

use	the return key.	<u></u>	
	FACILITY INFORMATION	allia specialisti (ili	
Company Name for Permit: AVX Corporation		2. Existing State Air Permit Number:	1340-0002
3. Business Mailing Address: PO Box 867	4. City: Myrtle Beach	5. State: SC 6. Zip Code:	29578-0867
7. Plant Location (Street or Highway): 801 17th Avenue South	8. City: Myrtle Beach	9. State: SC 10. Zip Code:	29578-0867
11. County: Horry	12. Primary SIC Code: 3675	13. NAICS Code: 334414	
14. EPA (AIRS) Facility Identification No.: 4505100002	15. Latitude: 33-40-42N	16. Longitude: 78-54-35W	
17. Date Facility Was Built: Originally constructed 1949; Modifications in 1985 a	and 1998		
	CONTACT INFORMATION		
SPONSIBLE OFFICIAL AUTHORIZED REPRESENTATIVE:	ENVIRONMENTAL / TECHNICAL CONT	ACT:	
Last:	29. Last:		

14. EPA (AIRS) Facility Identification No.: 4505100002	15. Latitude:	33-40-42N	16. Longitude:	78-54-35W
17. Date Facility Was Built: Originally constructed 1949; Modifications i	n 1985 and 1998			
	CONTACT INFOR	MATION		
PONSIBLE OFFICIAL AUTHORIZED REPRESENTATIVE:	Env	IRONMENTAL / TECHNICAL	CONTACT:	
ast:		_ast:		
is .	Brya			
irst:	30. F Ralp	First:		
itle:	31.			
President, SMD	Safe	ety & Environ Manager		
Mailing Address Line 1:		Mailing Address Line 1:		
17th Avenue South	801	17th Avenue South		
Mailing Address Line 2:	33 1	Mailing Address Line 2:		
Sox 867		Box 867		
Dity:	24 /	Ciby:		
e Beach	34. ( Myrt	oity: le Beach		
State:	35. 9	State:		
7- O-1	SC			
ip Code: 8-0867		ip Code: 78-0867		
0 0001	2931	0-0007		
Phone No.:		Phone No.:		
448-9411 ext. ax No.:		) 946-0326 ext. Fax No.:		
444-0424		- ax No.: ) 444-2883		
-mail Address:		E-mail Address:		
is@avxus.com	rbrya	ant@avxus.com		
	PURPOSE OF APP	LICATION		
40. Facility Type: ☐ Conditional Major ☒ Title V				
☐ Co-Located Facility (co-located facility if yes, name and permit # 41. Permit Action: ☐ New ☐ Renewal	f of co-located facility):			
	Minor Modification	☐ Significant	Modification	☐ Operational Flexibility
	Submit Form MM)	(Submit For	m SM)	(Submit Form OF)
42. Attainment Area Designation: Is the source located within a non-attainr If "Yes", Indicate Non-attainment Pollutant(s):	ment area for any of the criter O <sub>3</sub> (Precursor pollutants to C			
ii 163, iliuloate ivoirattaililletit Follutalit(5). 🔲 FM2.5			1	
and the second s	SIGNATURE			
I certify, to the best of my knowledge and belief, that no applicable sta certification submitted in this permit application is true, accurate, and c				
descriptions which are found to be incorrect may result in the immediate re			or reasonable inquity. The	unuorotanu tiiat any Statements a
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#### Title V Permit Application Facility Profile – Form A Bureau of Air Quality Page 2 of 2

		Consulting	FIRM INFORMATION	
44. Consulting Firm:	Resolute Environmental			
Preparer Name:	45. Last Yoder		46. First Gary	
47. Mailing Address Line 1:	114 Oak Fern Lane			
48. Mailing Address Line 2:				
49. City: Willow Spri	ng		50. State: NC	51. Zip Code: 27592-
52. Phone No.: (919) 7	01-0009 ext.	53. Fax No.: (919) 890-0704	54. E-mail Address: gyoder@nc.rr.com	

<sup>\*\*</sup>INCOMPLETE APPLICATIONS WILL BE RETURNED\*\*



#### Title V Permit Application Application Checklist - Form B Bureau of Air Quality Page 1 of 2



SUMMARY OF APPLICATION CONTENTS	
GENERAL APPLICATION CONTENTS - DOES THE APPLICATION PACKAGE INCLUDE	
1. A Table of Contents?	∑ Yes □ No □ N/A
2. A list of all items for which a permit is being sought (Form C Information)?	∑ Yes □ No □ N/A
3. A plot plan or map?	⊠ Yes □ No □ N/A
4. A detailed drawing of the layout of the facility showing exhaust points and dimensions of each structure, including height, width, and length?	⊠ Yes □ No □ N/A
5. A detailed facility-wide process description and flow diagram showing the relationship between each emission unit at the facility?	⊠ Yes □ No □ N/A
6. A detailed process description and diagram for each emission unit at the facility?	⊠ Yes □ No □ N/A
7. All reasonably anticipated operating scenarios?	⊠ Yes □ No □ N/A
8. Are fugitive emissions included in Forms D, and F?	⊠ Yes □ No □ N/A
<ol><li>Detailed calculations showing: (1) Uncontrolled emissions; (2) Control equipment efficiency; (3) Controlled emissions in pounds per hour and other applicable units, e. g. ppm or grains per cubic foot, if necessary, etc.; and (4) Allowable emissions, in the same terms as above?</li></ol>	
10. A request to utilize the operational flexibility provisions and include the information required for such use? (if applicable)	⊠ Yes □ No □ N/A
11. A request for a permit shield? (Complete Form K)	⊠ Yes □ No □ N/A
12. A completed listing of insignificant emission units, if applicable? (Complete Form G)	⊠ Yes □ No □ N/A
13a. Modeling results for NAAQS, PSD Class II Increment and/or Air Toxics if this facility has not already demonstrated compliance with these Standards as applicable (S.C. Regulation 61-62.5, Standards 2, 7 and 8)?	⊠ Yes □ No □ N/A
13b. If #13a is yes, does the plot plan required by item #3 show stack locations and dimensions (length, width, and height) of buildings/structure?	∑ Yes □ No □ N/A
14. A completed compliance plan/schedule of compliance as requested in Form I?	☐ Yes ☐ No ☒ N/A
15. A completed compliance plan/schedule of compliance addendum for each of the non-complying emission units for which issuance of a Part 70 permit is requested?	☐ Yes ☐ No ☒ N/A
16. A completed compliance certification form? Complete Forms A and I.	∑ Yes □ No □ N/A
17. Acid rain portions of permit application and compliance plans, as required by regulations promulgated under Title IV of the Act (if applicable). (See EPA forms on EPA's web site <a href="http://www.epa.gov/airmarkets/forms/index.html#permits">http://www.epa.gov/airmarkets/forms/index.html#permits</a> ).	☐ Yes ☐ No ☒ N/A
COPIES OF APPLICATION	
18a. Does the application contain confidential information? If yes, all confidential information should be submitted under separate cover.	☐ Yes ☒ No ☐ N/A
18b. Have <b>two copies</b> of the application suitable for public inspection and one copy with confidential information properly marked (if applicable) been submitted, in accordance with applicable regulations?	
19. Has the application been submitted to any other government agency (not required)? If so, who?	☐ Yes ☒ No ☐ N/A
20. Does the application include an electronic copy of the application? (Mandatory)	∑ Yes □ No □ N/A
21. Is the facility submitting a draft Title V permit with this application (optional)?	☐ Yes ☒ No ☐ N/A
22. For any non-permitted emission sources or activities a separate construction permit application should not be included in this application. Please submit construction permit applications under a separate cover.	
REGULATORY INFORMATION REQUESTED	
23. Does the application include a proposed determination of maximum achievable control technology (MACT) for hazardous air pollutants pursuant to sections 112(g) and 112(j) of the Clean Air Act Amendments of 1990? (if applicable)	
24. Does the application include sufficient information regarding accidental releases pursuant to section 112(r) of the Clean Air Act Amendments of 1990? (if applicable)	☐ Yes ☐ No ☒ N/A
25. Does the application identify all applicable requirements including section 111 (NSPS) and/or Section 112 (NESHAP) of the Clean Air Act? (Form K)	⊠ Yes □ No □ N/A
26. If applicable, is a Compliance Assurance Monitoring (CAM) Plan submitted with this Title V permit application (Form I and/or CAM Plan Supplemental Form)?	⊠ Yes □ No □ N/A
27. Does the application include an applicability determination for all sources subject to CAM (Form I)?	☐ Yes ☐ No ☒ N/A
28. Is a Lowest Achievable Emission Rate (LAER)/ Best Available Control Technology (BACT) baseline and analysis included?	☐ Yes ☐ No ☒ N/A
28a. Is the facility subject to the NOx SIP call?	☐ Yes ☐ No ☒ N/A
WHY APPLICANT IS APPLYING FOR A TITLE V PERMIT? (CHECK ALL THAT APPLY)	
29a. The "potential to emit" of the facility is 100 tons/year or more for an individual regulated pollutant.	☐ Yes ☒ No ☐ N/A



#### Title V Permit Application Application Checklist - Form B Bureau of Air Quality Page 2 of 2



29b. The facility is an affected facility for acid rain deposition.	☐ Yes ☐ No ☒ N/A
29c. The "potential to emit" for any one hazardous air pollutant is 10 tons/year or more, or the total of all hazardous air pollutants is 25 tons/year or more, or the facility meets an other applicable lower threshold required by a MACT Standard.	⊠ Yes □ No □ N/A
29d. Other reason –(e.g. co-location) Please list:	☐ Yes ☐ No ☒ N/A
CONDITIONAL MAJOR REQUEST OR REGULATORY AVOIDANCE	
30. Are all controlled emissions of the facility below the applicability levels for Part 70 permit?	⊠ Yes □ No □ N/A
31. Does the application propose limitations that will constrain the operation of the facility such that potential emissions of the facility will fall below applicability levels for Part 70 permits or MACT applicability?	☐ Yes ☐ No ☒ N/A
32. Is the facility requesting a MACT avoidance limit?	☐ Yes ☐ No ☒ N/A
33. Is the facility requesting a PSD/NSR avoidance (facility-wide)?	☐ Yes ☐ No ☒ N/A
34. Is the facility requesting a BACT/LAER, SC Regulation 61-62.5, Standard 5.1 avoidance?	☐ Yes ☐ No ☒ N/A

## Title V Permit Application Emission Unit & Equipment Information – Form C Bureau of Air Quality Page 1 of 5

# Please Refer to Instruction / Definitions Pages Before Completing This Form

(A)	3. Control Device	DC-A (baghouse); DC-B (baghouse); DC-C (baghouse)	None	None	AD1, AD-2, AD-3, TO-1	MB2-BH	None	TFS	None
EMISSION UNIT DESCRIPTION (Table is a description of emission units located at this facility)	2. Emission Unit Description/Purpose	Raw Materials Manufacturing: grinding, mixing and milling of ceramic powder	Slip Manufacturing - mixing and milling of ceramic powders and solvents to form slip slurry	Metals Department - Production of conductive metal inks and termination pastes	CMAP Buildup: layer slip and metal paste to build up capacitor chips	CMAP Support: Cutting of capacitors into predetermined shapes	Metallization Department - application of paste or inks to connect internal electrodes	Thin Film Process: Manufacture of integrated passive devices and components	Miscellaneous support
	1. Emission Unit ID (If the emission unit is on the Insignificant Activity List proceed to Forms G & F)	14	15	16	17	18	19	20	21

EMISSION UNIT PROCESS DESCRIPTION  (For each emission unit listed above, provide the following emission unit process description information)	4. Process       5. Production Rate (units per time period)       6. Product       7. SIC/NAICS Code (tons/hr)       8. Comments (Special permit limits, etc.)	14 0.7 (batch and 4,000,000 lb/yr (design) Ceramic and metal 3675/334414 None None	15 88.4 (batch) 80,200 kg/hr Ceramic slip and slurry 3675/334414 None	16 0.6 (batch) 12,300 kg/day Metal pastes, solvents, 3675/334414 None	17 N/A 20,000,000 chips/day Capacitor chips 3675/334414 None	18 0.011 20,000,000 chips/day Capacitor chips 3675/334414 None	19 N/A 20,000,000 chips/day Capacitor chips 3675/334414 None	20 N/A 500 wafers/yr Capacitor wafers 3675/334414 None
	1. Emission Unit ID	14	15	16	17	18	19	20

## Title V Permit Application Emission Unit & Equipment Information – Form C Bureau of Air Quality Page 2 of 5

description information)	8. Comments (Special permit limits, etc.)	None
EMISSION UNIT PROCESS DESCRIPTION  above provide the following emission unit process description information)	7. SIC/NAICS Code	3675/334414
_	₹	N/A
(For each emission unit lister	5. Production Rate (units per time period)	N/A
	4. Process Weight Rate (tons/hr)	25.0
	1. Emission Unit ID	21

	CONTROL DEVICE INFORMATION (Table is a description of control devices located at this facility)		
3. Control Device ID	9. Control Device Description (Manufacturer, Name, Model #, etc.)	10. Installation Date	11. Pollutant(s) Controlled
DC-A (Unit 14)	Baghouse (Farr Tenkay Dust Collector 60L)	1987	PM, PM10, PM2.5
DC-B (Unit 14)	Baghouse (Farr Tenkay Dust Collector 60L)	1987	PM, PM10, PM2.5
DC-C (Unit 14)	Baghouse (American Air Filter Pulse Pak II)	1985	PM, PM10, PM2.5
AD-1, AD-2 (Unit 17)	FluiSorb adsorber/desorber system (EC&C)	1998,2000	VOC, organic HAP/TAP
AD-3 (Unit 17)	FluiSorb adsorber/desorber system (EC&C)	2001	VOC, organic HAP/TAP
TO-1 (Unit 17)	Thermal oxidizer (EC&C)	1999	VOC, organic HAP/TAP
MB2-BH (Unit 18)	Baghouse (Spencer Vacuum Dust Collector)	1998	PM,PM10,PM2.5
TFS (Unit 20)	Two fluidized bed scrubbers	2002	VOC, OHAP/TAP, Lead, Acid Mist

			CONTROL DEVICE	CONTROL DEVICE INFORMATION (CONTINUED)	ITINUED)		
3. Control Device ID	12. Capture System	13. Capture (%)	14. Removal/ Destruction (%)	15. Removal/ Destruction (Method Used to Determine)	16. Parameter Monitored	17. Exhaust ID	18. Comments (special permit limitations, Fuel info., different capture systems, etc.)
DC-A (Unit 14)	N/A	100	99.97	Vendor	Delta P	15A-1	None
DC-B (Unit 14)	N/A	100	99.97	Vendor	Delta P	15B-1	None
DC-C (Unit 14)	N/A	100	99.97	Vendor	Delta P	15C-1	None
AD-1, AD-2 (Unit 17)	Enclosure	98.5 est.	98.5 (system)	Source test	Differential pressure, midbed temperature	NMFS-F1, NMFS-F2	Provides concentrated exhaust stream to TO-1.

## Title V Permit Application Emission Unit & Equipment Information – Form C Bureau of Air Quality Page 3 of 5

			CONTROL DEVICE INFORMATION (CONTINUED)	INFORMATION (CON	ITINUED)		
3. Control Device ID	12. Capture System	13. Capture (%)	14. Removal/ Destruction (%)	15. Removal/ Destruction (Method Used to Determine)	16. Parameter Monitored	17. Exhaust ID	18. Comments (special permit limitations, Fuel info., different capture systems, etc.)
AD-3 (Unit 17)	Enclosure	98.5 est.	98.5 (system)	Source test	Differential pressure, mid- bed temperature	NMFS-F1, NMFS-F2	Provides concentrated exhaust stream to TO-1.
TO-1 (Unit 17)	Enclosure	100	98.5 (system)	Source test	Differential pressure, mid- bed temperature	NMFS-F1, NMFS-F2	None
MB2-BH (Unit 18)	N/A	100	99.5	Vendor	Delta P	NMFS-BH	None
TFS (Unit 20)	N/A	90 est.	99 (acid mist and lead); 50 (soluble organic species)	Vendor	Pressure drop, pH	NMFS-TFS	None

		EQUIPI (For each emission unit please provide a	EQUIPMENT DESCRIPTION please provide a description of the all equipment located at this facility)	ipment located at this	s facility)		
1. Emission Unit ID	19. Equipment ID	20. Equipment Description	21. Installation Date (Manufacturer Date and Original and Modification Date)	22. Modification Description	3. Control Device ID	17. Exhaust ID	23. Design Capacity (units)
14	RMMPSC	6 Prep devices for adding dry material to slurry	1993-1997	None	DC-A, DC-B, DC-C	15A-1, 15B-1, 15C-1	4,000,000 lb/yr (total)
14	RMMPG	4 Machines for grinding ceramic prills	1983-1989	None	DC-A, DC-B, DC-C	15A-1, 15B-1, 15C-1	700,000 lb/yr (total)
14	RMMRPILL	7 Machines for making ceramic prills	1983-1989	None	DC-A, DC-B, DC-C	15A-1, 15B-1, 15C-1	2,400,000 lb/yr (total)
15	SMILL	19 Machines to mill ceramic material	1997	None	N/A	Fugitive	11,200 kg/hr
15	XIWS	35 Machines to mix ceramic slurry	1980-1997	None	N/A	Fugitive	69,000 kg/hr
16	MMILL	8 Machines to mill electrode inks and termination pastes	1980-1999	None	N/A	MD1C-1, MD2C-1, MD3C-1	6,600 kg/day (total)

## Title V Permit Application Emission Unit & Equipment Information – Form C Bureau of Air Quality Page 4 of 5

	23. Design Capacity (units)	5,700 kg/day (total	20,000,000 chip/day	20,000,000 chip/day	20,000,000 chip/day	20,000,000 chip/day	20,000,000 chip/day	500 wafers/yr	100 gpm	N/A	16.738 MMBtu/hr
	17. Exhaust ID	MD3C-1	NMFS-F1, NMFS-F2	HB-SHNN	Fugitive	Fugitive	7C-2A, 7C-2B	SHT-SHWN	1-1S	SOLDER1	NMFS-B1
is facility)	3. Control Device ID	N/A	AD-1, AD-2, AD-3, TO-1	MB2-BH	None	None	None	TFS	None	None	None
ipment located at th	22. Modification Description	None	None	None	None	None	None	None	None	None	None
EQUIPMENT DESCRIPTION olease provide a description of the all equipment located at this facility)	21. Installation Date (Manufacturer Date and Original and Modification Date)	1980-2000	1998-2001	2000	1981-2000	1993-2000	2007-2008	2002	2009	2010	1999
<b>ΕQυιρ</b> (For each emission unit please provide a	20. Equipment Description	27 Machines to mix electrode inks and termination pastes	24 CMAP machines	5 Dry dicing machines	20 Machines that apply termination paste to capacitor chips	9 Termination ovens to cure termination paste	2 Ni/Sn/Pb SBE plating lines	Thin film process	Groundwater air stripping tower	4 Soldering stations	16.738 MMBtu/hr natural gas-fired boiler
	19. Equipment ID	XIWIW	CMAP	aa	10011	TOVEN	BSBE	TFP	IS	SS	B201
	1. Emission Unit ID	16	17	18	19	19	19	20	21	21	21

		EQUIPMENT DESC	EQUIPMENT DESCRIPTION (CONTINUED)	
19. Equipment ID	24. Primary Fuel Combusted (If Applicable)	25. Secondary Fuel Combusted (If Applicable)	26. Construction Permit ID or Exemption Date (if applicable)	27. Comments (list special permit limitations, fuel info, etc.)
RMMPSC (Unit 14)	N/A	N/A	N/A	None
RMMPG (Unit 14)	V/N	N/A	1340-0002-CR	None
RMMRPILL (Unit 14)	W/A	N/A	N/A	None
SMILL (Unit 15)	N/A	N/A	N/A	None
SMIX (Unit 15)	N/A	N/A	N/A	None

## Title V Permit Application Emission Unit & Equipment Information – Form C Bureau of Air Quality Page 5 of 5

EQUIPMENT DESCRIPTION (CONTINUED)	24. Primary Fuel Combusted 25. Secondary Fuel Combusted 26. Construction Permit ID or 27. Comments (If Applicable) Exemption Date (if applicable) (If Applicable) (and a special permit limitations, fuel info, etc.)	N/A N/A None	N/A N/A None	N/A N/A 1340-0002-CS and CT None	N/A N/A None	N/A N/A 1340-0002-CO, R1 & CU None	N/A N/A 12/17/199 None	N/A N/A 12/17/199 None	N/A N/A 12/17/2007 None	N/A N/A 1340-0002-CV None	N/A N/A 1340-0002-CJ None	N/A N/A None	Natural gas N/A 1340-0002-CQ None
	24. Primary Fuel Combu (If Applicable)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Natural gas
	19. Equipment ID	MMILL (Unit 16)	MMIX (Unit 16)	CMAP (Unit 17)	CMAPT (Unit 17)	DD (Unit 18)	TTOOL (Unit 19)	TOVEN (Unit 19)	PBSBE (Unit 19)	TFP (Unit 20)	ST	SS	B201



## Title V Permit Application Emission Data for Regulated Pollutants – Form D Bureau of Air Quality Page 1 of 6

# Please Refer to Instruction / Definitions Pages Before Completing This Form

1. Emission Unit ID: (If the emission unit is on the Insignificant	2. Exhaust Point ID (if	3. Pollutant:	4. CAS Number	5. Type of Pollutant:	6. Maximum Uncontrolled	mum	7. Max Cont	7. Maximum Controlled
Activity List proceed to Forms G & F)	applicable)		(п аррпсавте):		(lb/hr)	(TPY)	(lb/hr)	(TPY)
14	15A-1. 15B- 1, 15C-1	PM	N/A	Criteria	0.13	25.0	3.90E-5	1.71E-4
14	15A-1. 15B- 1, 15C-1	PM10	N/A	Criteria	60:0	0.37	2.6E-5	1.12E-4
14	15A-1. 15B- 1, 15C-1	PM2.5	N/A	Criteria	60:0	0.37	2.6E-5	1.12E-4
15	Fugitive	200	N/A	Criteria	5.59	24.48	5.59	24.48
15	Fugitive	Methyl Isobutyl Ketone	108-10-1	Volatile HAP, TAP	9.27E-4	4.06E-3	9.27E-4	4.06E-3
15	Fugitive	Methyl alcohol	67-56-1	Volatile HAP, TAP	1.76E-3	7.70E-3	1.76E-3	7.70E-3
15	Fugitive	Bis(2-ethylhexyl) phthalate	117-81-7	Volatile HAP, TAP	0:030	0.13	0:030	0.13
15	Fugitive	Xylene	1330-20-7	Volatile HAP, TAP	5.27E-3	0.02	5.27E-3	0.02
16	MD1C-1, MD2C-1, MD3C-1	NOC	N/A	Criteria	1.41	6.16	1.41	6.16
16	MD1C-1, MD2C-1, MD3C-1	Md	N/A	Criteria	0.27	1.17	0.27	1.17
16	MD1C-1, MD2C-1, MD3C-1	PM10	N/A	Criteria	0.17	72.0	0.17	0.77
16	MD1C-1, MD2C-1, MD3C-1	PM2.5	N/A	Criteria	0.17	22.0	0.17	0.77
16	MD1C-1, MD2C-1, MD3C-1	Xylene	1330-20-7	Volatile HAP, TAP	0.01	90.0	0.01	0.05
16	MD1C-1, MD2C-1, MD3C-1	Bis(2-ethylhexyl) phthalate	117-81-7	Volatile HAP, TAP	0.001	4.88E-3	0.001	4.88E-3
16	MD1C-1, MD2C-1, MD3C-1	Toluene	108-88-3	Volatile HAP, TAP	1.32E-04	5.76E-4	1.32E-4	5.76E-4
DHEC 2941 (02/2005)								

DHEC 2941 (02/2005)



## Title V Permit Application Emission Data for Regulated Pollutants – Form D Bureau of Air Quality Page 2 of 6

2. Exhaust Point ID (if	3. Pollutant:	4. CAS Number	5. Type of Pollutant:	6. Maximum Uncontrolled	imum rolled	7. Ma Con	7. Maximum Controlled
		(if applicable):		(lb/hr)	(тРY)	(lb/hr)	(тРY)
Ethyl benzene	ızene	100-41-4	Volatile HAP, TAP	6.58E-05	2.88E-4	6.58E-5	2.88E-4
Methyl alcohol	ohol	67-56-1	Volatile HAP, TAP	3.24E-04	1.42E-3	3.24E-4	1.42E-3
Methyl Isobutyl Ketone	l Ketone	108-10-1	Volatile HAP, TAP	1.71E-4	7.49E-4	1.71E-4	7.49E-4
NOC		N/A	Criteria	39.19	114.44	0.59	1.74
PM		N/A	Criteria	0.01	0.03	0.01	0.03
PM10		N/A	Criteria	0.01	0.03	0.01	0.03
PM2.5		N/A	Criteria	0.01	0.03	0.01	0.03
802		N/A	Criteria	0.001	0.003	0.001	0.003
NOx		N/A	Criteria	0.10	0.44	0.10	0.44
00		N/A	Criteria	60.0	0.37	0.09	0.37
Methyl Isobutyl Ketone	etone	108-10-1	Volatile HAP, TAP	0.50	1.47	7.53E-3	0.022
Methyl Alcohol	o	67-17-5	Volatile HAP, TAP	1.41	4.12	0.021	0.062
Toluene		108-88-3	Volatile HAP, TAP	0.20	0.57	2.94E-3	8.58E-3
Ethylbenzene	Ф	100-41-4	Volatile HAP, TAP	0.20	0.57	2.94E-3	8.58E-3
Bis(2-ethylhexyl) phthalate	xyl)	117-81-7	Volatile HAP, TAP	0.20	0.57	2.94E-3	8.58E-3
Xylene		1330-20-7	Volatile HAP, TAP	0.20	0.57	2.94E-3	8.58E-3
C02		124-38-9	9H9	122.40	528.0	122.4	528.0



## Title V Permit Application Emission Data for Regulated Pollutants – Form D Bureau of Air Quality Page 3 of 6

1. Emission Unit ID: (If the emission unit is on the Insignificant	2. Exhaust Point ID (if	3. Pollutant:	4. CAS Number	5. Tvpe of Pollutant:	6. Maximum Uncontrolled	mum	7. Max Cont	7. Maximum Controlled
Activity List proceed to Forms G & F)	applicable)		(if applicable):		(lb/hr)	(TPY)	(Ib/hr)	(ТРҮ)
21	NMFS-F1	NZO	10024-97-2	9H9	0.002	0.01	0.002	0.01
17	NMFS-F1	CH4	74-82-8	ЭНЭ	0.002	0.01	0.002	0.01
17	Fugitive	NOC	N/A	Criteria	3.13	13.28	3.13	13.28
17	Fugitive	Methyl Isobutyl Ketone	108-10-1	Volatile HAP, TAP	0.021	990.0	0.021	990:0
17	Fugitive	Methyl Alcohol	67-17-5	Volatile HAP, TAP	0.04	0.063	0.04	0.125
17	Fugitive	Toluene	108-88-3	Volatile HAP, TAP	4.8E-3	0.014	4.8E-3	0.014
17	Fugitive	Ethylbenzene	100-41-4	Volatile HAP, TAP	4.8E-3	0.014	4.8E-3	0.014
17	Fugitive	Bis(2-ethylhexyl) phthalate	117-81-7	Volatile HAP, TAP	4.8E-3	0.014	4.8E-3	0.014
17	Fugitive	Xylene	1330-20-7	Volatile HAP, TAP	4.8E-3	0.014	4.8E-3	0.014
18	NMFS-BH	PM	N/A	Criteria	8.73	38.23	0.04	0.19
18	NMFS-BH	PM10	N/A	Criteria	8.73	38.23	0.04	0.19
18	NMFS-BH	PM2.5	N/A	Criteria	8.73	38.23	0.04	0.19
19	Fugitive	NOC	N/A	Criteria	1.18	5.17	1.18	5.17
19	Fugitive	Methyl Isobutyl Ketone	108-10-1	Volatile HAP, TAP	0.01	0.04	0.01	0.04
19	Fugitive	Methyl Alcohol	67-56-1	Volatile HAP, TAP	0.017	0.07	0.017	0.07
19	7C-2A&7C- 2B	Md	N/A	Criteria	3.15E-4	1.38E-3	3.15E-4	1.38E-3
19	7C-2A&7C- 2B	PM10	N/A	Criteria	3.15E-4	1.38E-3	3.15E-4	1.38E-3
19	7C-2A&7C- 2B	PM2.5	N/A	Criteria	3.15E-4	1.38E-3	3.15E-4	1.38E-3
19	7C-2A&7C- 2B	Nickel	N/A	HAP, TAP	2.46E-4	1.08E-3	2.46E-4	1.08E-3
19	7C-2A&7C- 2B	Lead	N/A	Criteria	1.71E-6	7.5E-6	1.71E-6	7.5E-6
20	NMFS-TFS	NOC	N/A	Criteria	0.47	2.07	0.24	1.05
20	NMFS-TFS	PM	N/A	Criteria	0.75	3.26	0.01	0.03
20	NMFS-TFS	PM10	N/A	Criteria	0.75	3.26	0.01	0.03
DUEC 2014 (02/2005)								



## Title V Permit Application Emission Data for Regulated Pollutants – Form D Bureau of Air Quality Page 4 of 6

1. Emission Unit ID: (If the emission unit is	2. Exhaust	:	4. CAS Number		6. Maximum Uncontrolled	imum	7. Max Cont	7. Maximum Controlled
on the insignificant Activity List proceed to Forms G & F)	Point ID (if applicable)	3. Pollutant:	(if applicable):	5. Type of Pollutant:	(lb/hr)	(ТРҮ)	(lb/hr)	(ТРҮ)
20	NMFS-TFS	PM2.5	N/A	Criteria	0.75	3.26	0.01	0.03
20	NMFS-TFS	Lead compounds	N/A	Particulate HAP	0.01	0.03	6.67E-5	2.92E-4
20	NMFS-TFS	Hydrochloric Acid	7647-01-0	HAP, TAP	0.09	0.40	9.18E-4	4.02E-3
20	NMFS-TFS	Sulfuric Acid	7664-93-9	TAP	0.07	0.32	7.21E-4	3.16E-3
20	NMFS-TFS	Nitric Acid	7697-37-2	TAP	0.39	1.70	3.88E-3	1.70E-2
20	NMFS-TFS	Phosphoric Acid	7664-38-2	TAP	0.16	0.70	1.59E-3	6.98E-3
20	NMFS-TFS	2-ethanolamine	141-43-5	TAP	0.10	0.45	5.19E-2	2.27E-1
20	NMFS-TFS	Hydrofluoric acid	7664-39-3	HAP, TAP	0.02	0.08	1.75E-4	7.67E-4
20	NMFS-TFS	DGDE	11109-77-4	HAP	2.17E-3	9.5E-3	1.08E-3	4.75E-3
20	NMFS-TFS	1-Methoxy-2-propanol	107-98-2	НАР	2.38E-3	0.01	1.19E-3	5.29E-3
21	NMFS-B1	700	N/A	Criteria	0.11	0.40	0.11	0.40
21	NMFS-B1	NOx	N/A	Criteria	2.0	7.19	2.0	7.19
21	NMFS-B1	00	N/A	Criteria	1.68	6.04	1.68	6.04
21	NMFS-B1	802	N/A	Criteria	0.01	0.04	0.01	0.04
12	NMFS-B1	PM	N/A	Criteria	0.12	0.54	0.12	0.54
21	NMFS-B1	PM10	N/A	Criteria	0.12	0.54	0.12	0.54
12	NMFS-B1	PM2.5	N/A	Criteria	0.12	0.54	0.12	0.54
21	NMFS-B1	C02	124-38-9	ЭНЭ	2400	8625	2400	8625
21	NMFS-B1	N2O	10024-97-2	9H9	0.04	0.16	0.04	0.16
21	NMFS-B1	CH4	74-82-8	ЭНЭ	90'0	0.17	0.05	0.17
12	NMFS-B1	Lead	N/A	PM, HAP	1.0E-5	3.59E-5	1.0E-5	3.59E-5
12	NMFS-B1	Benzene	71-43-2	Volatile HAP, TAP	4.25E-5	1.51E-4	4.2E-5	1.51E-4
12	NMFS-B1	Polycyclic Organic Matter	N/A	Volatile HAP, TAP	1.76E-6	6.43E-6	1.76E-6	6.43E-6
21	NMFS-B1	Naphthalene	91-20-3	Volatile HAP, TAP	1.22-5	4.38E-5	1.22E-5	4.38E-5
21	NMFS-B1	Toluene	108-88-3	Volatile HAP, TAP	6.8E-5	2.44E-4	6.8E-5	2.44E-4



## Title V Permit Application Emission Data for Regulated Pollutants – Form D Bureau of Air Quality Page 5 of 6

1. Emission Unit ID:	2. Exhaust Point ID (if applicable)	3. Pollutant:	8. Estimation Method:	9. Comments:
14	15A-1. 15B- 1, 15C-1	All	Engineering calculations through mass balance and EPA factors	PM emissions from vat loading are accounted for in grinders, mills and mixers
15	SM1	All	Engineering calculations through mass balance	None
16	MD1C-1, MD2C-1, MD3C-1	All	Engineering calculations through mass balance, EPA factors and engineering knowledge	nd
17	NMFS-F1, NMFS-F2 and Fug.	All	Engineering calculations through source testing and mass balance	nce
18	NMFS-BH	All	Engineering calculations through engineering estimates and mass balances	ass
19	NMF-PA / TP	All	Engineering calculations through mass balance, process knowledge and EPA factors	None



## Title V Permit Application Emission Data for Regulated Pollutants – Form D Bureau of Air Quality Page 6 of 6

All Eng	Engineering calculations through process knowledge and mass	PM/PM10 assumed to equal acid mist and lead
	00	compounds
All	Engineering calculations (modeling) and EPA Factors	None
₽		Engineering calculations (modeling) and EPA Factors



#### Title V Permit Application Facility Wide Information – Form E Bureau of Air Quality Page 1 of 1

#### Please Refer to Instruction / Definitions Pages Before Completing This Form

	FACILITY WIDE I	RAW MATERIALS AND PRODUCTS		
1. Raw Materials	2. Quantity	3. Products (List Products in order of major to minor)	4. SIC/NAICS Code	5. Production Rate
Terpineol	8745 gal/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Mineral Spirits	18,370 gal/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Denatured Ethyl Alcohol	7370 gal/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Glycol Ethers-PCPM	85310 gal/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Bio-Act 113	2200 gal/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Butyl Cellosolve	2860 gal/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Acetone	1375 gal/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Isopropyl Alcohol	945 gal/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Axarel	1800 gal/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Xylene	5525 gal/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Iso Spirits	20,570 gal/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Southpar K	55 gal/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
DiOctylPhthalate	275 gal/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
PGME	385 gal/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Dipentene	220 gal/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Mineral Spirits Type 66	385 gal/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Diethylene Glycol Dibutyl Ether	440 gal/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Barium Compounds	1.930260 Lbs/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Nickel Compounds	133990 Lbs/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Silver Compounds	44450 Lbs/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year
Copper Compounds	43350 Lbs/yr	Capacitor Chips	3675/334414	7.3 Billion Chips/year



#### **Title V Permit Application** Facility Wide Total Emissions – Form F **Bureau of Air Quality** Page 1 of 1

#### Please Refer to Instruction / Definitions Pages Before Completing This Form (Include Insignificant Activity Emissions in Facility Wide Totals)

(IIICIU	de Insignificant Activity Emissi FACILITY WIDE TOTAL		
1. Pollutant	2. CAS No. (If Applicable)	3. Uncontrolled Emissions (TPY)	4. Controlled Emissions (TPY)
PM	N/A	44.25	2.41
PM10	N/A	43.64	2.0
PM2.5	N/A	43.64	2.0
SO2	N/A	0.44	0.44
NOx	N/A	13.67	13.67
CO	N/A	7.71	7.71
VOC	N/A	170.11	56.4
CO2	N/A	9377.0	9377.0
N2O	N/A	0.17	0.17
Methane	N/A	0.18	0.18
Bis(2-ethylhexyl) phthalate (HAP, TAP)	117-81-7	0.73	0.16
Chromium,+6 (HAP, TAP)	N/A	7.48E-06	7.48E-06
Ethylidiene dichloride (HAP, TAP)	75-34-3	0.59	0.48
Formaldehyde (HAP, TAP)	50-0-0	0.005	0.005
Hexane (HAP, TAP)	110-54-3	0.13	0.13
Hydrochloric acid (HAP, TAP)	7647-01-0	0.40	0.004
Manganese (HAP, TAP)	N/A	4.86E-04	4.86E-04
Methyl alcohol (HAP, TAP)	67-56-1	0.28	0.27
Methyl isobutyl ketone (HAP, TAP)	108-10-1	1.54	0.13
Nickel compounds (HAP, TAP)	N/A	1.08E-03	1.08E-03
Lead compounds (HAP)	N/A	0.03	4.29E-04
Vinyl chloride (HAP, TAP)	75-01-4	4.33	0.40
Xylene (HAP, TAP)	1330-20-7	0.66	0.09
Ethyl benzene (HAP, TAP)	100-41-4	0.03	0.02
Toluene (HAP, TAP)	108-88-3	0.59	0.02
Sulfuric acid (TAP)	7664-93-9	0.32	3.16E-03
Nitric acid (TAP)	7697-37-2	1.70	1.70E-02
Phosphoric acid (TAP)	7664-38-2	0.70	6.98E-03
2-ethanolamine (TAP)	141-43-5	0.45	0.23
Polycyclic Organic Matter (HAP, TAP)	POM	6.34E-06	6.34E-06
Trichloroethylene (HAP, TAP)	79-01-6	1.32	1.32
Hydrofluoric acid (HAP, TAP)	7664-39-3	0.08	7.67E-04
1-Methoxy-2-propanol (HAP)	107-98-2	1.04E-02	5.29E-03
Dipropylene glycol dimethyl ether (HAP)	11109-77-4	9.49E-03	4.75E-03
Benzene (HAP, TAP)	71-43-2	1.51E-04	1.51E-04



## Title V Permit Application Facility Wide Total Emissions – Form F Bureau of Air Quality Page 2 of 1

Naphthalene (HAP, TAP)	91-20-3	4.38E-05	4.38E-05
Total HAP	N/A	3.87	3.30



#### Title V Permit Application Insignificant Activity Equipment– Form G Bureau of Air Quality Page 1 of 3

# Please Refer to Instruction / Definitions Pages Before Completing This Form

1. Insignificant Activity(IA) Unit ID:	2. Insignificant Activity Unit ID Description	3. Construction Permit ID or Approval Date (if applicable):	4. On SC Insignificant Activity List (Yes or No)	5. Pollutant(s)	6. Emission Rate (Uncontrolled)	7. Deminimis Rate
	11 drying ovens to remove moisture and detergent/dispersant (Unit 14)		oN	PM/PM10/PM2.5	Less than 5 tpy	< 5 tpy criteria pollutants
	2 tape shredders (Unit 14)		oN	PM/PM10/PM2.5	Less than 5 tpy	< 5 tpy criteria pollutants
	9 Ovens for moisture removal in test & dev. (Unit 14)		Yes	N/A	N/A	Sec. A, 13
	3 rapid temperature furnaces in T&D		No	N/A	N/A	Sec. A, 13
	Testing & dev. Priller (Unit 14)		Yes	N/A	N/A	Sec. A, 13
	4 Small rotary kilns (Unit 14)		No	PM/PM10/PM2.5	Less than 5 tpy	< 5 tpy criteria pollutants
RMMSPEX	3 Mixers in test & dev. (Unit 14)		oN	N/A	N/A	Sec. A, 13
	16 Vertical calcining kilns		No	PM/PM10/PM2.5	Less than 5 tpy	< 5 tpy criteria pollutants
	Transguard process (Unit 14)	2007	No	PM/PM10/PM2.5	Less than 5 tpy	< 5 tpy criteria pollutants
	Bioact cleaning system (Unit 15)		oN	NOC	Less than 5 tpy	< 5 tpy criteria pollutants
	Fume Hood (laboratory hoods) (Unit15)		Yes	N/A	N/A	Sec. A, 13
	QC lab oven (Unit 15)		ХөХ	N/A	N/A	Sec. A, 13
	2 Filter Presses (Unit 16)		oN	NOC	Less than 5 lpy	< 5 tpy criteria pollutants
	Pot storage room exhaust (Unit 16)		No	VOC	Less than 5 lpy	< 5 tpy criteria pollutants
	2 Fume Hoods (laboratory hoods) (Unit 16)		Yes	N/A	N/A	Sec. A, 13
	2 Solvent wash sinks (Unit 16)		oN	700	Accounted for in process	< 5 tpy criteria pollutants
	Lab oven (Unit 16)		Yes	N/A	N/A	Sec. A, 13
	Screen Room (Unit 17)		oN	NOC	Less than 5 tpy	< 5 tpy criteria pollutants
	3 Solvent wash stations (Unit17)		oN	NOC	Less than 5 tpy	< 5 tpy criteria pollutants



#### Title V Permit Application Insignificant Activity Equipment– Form G Bureau of Air Quality Page 2 of 3

1. Insignificant Activity(IA) Unit ID:	2. Insignificant Activity Unit ID Description	3. Construction Permit ID or Approval Date (if applicable):	4. On SC Insignificant Activity List (Yes or No)	5. Pollutant(s)	6. Emission Rate (Uncontrolled)	7. Deminimis Rate
BO	33 Ovens for chip binder burnout		o <sub>N</sub>	VOC	Less than 5 tpy	< 5 tpy criteria pollutants
cso	16 Low temperature ovens for moisture removal (Unit 18)		No	PM/VOC	Less than 5 tpy	< 5 tpy criteria pollutants
CSTR	<ol> <li>Thermal release oven for paper removal (Unit 18)</li> </ol>		oN	PM/VOC	Less than 5 tpy	< 5 tpy criteria pollutants
CSPA	2 Paper applicator machines (Unit 18)		oN	NOC	Less than 5 tpy	< 5 tpy criteria pollutants
CSCD	2 Low temperature chip dryers (Unit 18)		oN	PM/VOC	Less than 5 tpy	< 5 tpy criteria pollutants
cscs	Blade cleaning station (Unit 18)		oN	NOC	Less than 5 tpy	< 5 tpy criteria pollutants
关	Firing Kilns (Unit 18)		No	VOC	Less than 5 tpy	< 5 tpy criteria pollutants
TL	5 Labeling lasers (Unit19)		oN	PM/VOC	Less than 5 tpy	< 5 tpy criteria pollutants
TSW	1 Solvent wash station (Unit 19)		No	VOC	Less than 5 tpy	< 5 tpy criteria pollutants
SBE	3 Non-lead SBE plating lines (Unit 19)	October 2007	oN	PM/VOC	Less than 5 lpy	< 5 tpy criteria pollutants
BCB	BCB coating process (Unit 19)	September 2007	oN	PM/VOC	Less than 5 lpy	< 5 tpy criteria pollutants
FCT	Fine Copper Termination (Unit 19)		oN	PM/VOC	Less than 5 lpy	< 5 tpy criteria pollutants
GPL	1 Manual gold plating line (Unit 19)		oN	PM	Less than 5 lpy	< 5 tpy criteria pollutants
PDD	<ol> <li>Plating dryers for moisture removal (Unit 19)</li> </ol>		oN	PM/VOC	Less than 5 lpy	< 5 tpy criteria pollutants
PDO	1 Plate drying oven for moisture removal (Unit 19)		oN	PM	Less than 5 lpy	< 5 tpy criteria pollutants
co	1 Copper coupon oven (Unit 19)		No	PM/VOC	Less than 5 lpy	< 5 tpy criteria pollutants
DFP	87 BHp Diesel Fire Pump (Unit 21)		Yes	N/A	N/A	Sec. B, 4
E1	100 kW emergency generator		Yes	N/A	N/A	Sec. B, 2a
E5	260 kW emergency generator		Yes	N/A	N/A	Sec. B, 2b



#### Title V Permit Application Insignificant Activity Equipment– Form G Bureau of Air Quality Page 3 of 3



#### Title V Permit Application Stack/Vent Information – Form H Bureau of Air Quality Page 1 of 2

# Please Refer to Instruction / Definitions Pages Before Completing This Form

			SIACKVENI	STACK/VENT INFORMATION				
Point ID	2. Emission/ Equipment ID	3. Pollutant	4. CAS No. (if applicable)	5. Date last modeled (if Applicable)	6. Modeled Emission Rates (Ib/hr) (if applicable)	7. Stack Gas Exit Temp (degrees F)	8. Stack Gas Exhaust Velocity (ft/sec)	9. Non-Vertical Discharge (H) or Raincap (R)
15A-1	14 – RMM	PM/PM10/PM2.5	N/A	July 2007	N/A	20	14.4	۸
15B-1	14 – RMM	PM/PM10/PM2.5	N/A	July 2007	N/A	20	49.5	^
15C-1	14 – RMM	PM/PM10/PM2.5	N/A	July 2007	N/A	70	47.7	>
MD1C-1	16 – MMILL MMIX	Xylene, Bis(2-ehtylhexyl)phthalate, Toluene, Ethyl Benzene, MIBK, MEOH	1330-20-7, 117-81-7, 108-88-3, 100-41-4, 108-10-1, 67-56-1	July 2007	3.8E-3, 3.7E-4, 4.4E-5, 2.2E-5, 5.7E-5,1.1E-4	02	57	>
MD2C-1	16 – MMILL	Xylene, Bis(2-ehtylhexyl)phthalate, Toluene, Ethyl Benzene, MIBK, MEOH	1330-20-7, 117-81-7, 108-88-3, 100-41-4, 108-10-1, 67-56-1	July 2007	3.8E-3, 3.7E-4, 4.4E-5, 2.2E-5, 5.7E-5,1.1E-4	70	4.1	Ι
MD3C-1	16 – MMILL	Xylene, Bis(2-ehtylhexyl)phthalate, Toluene, Ethyl Benzene, MIBK, MEOH	1330-20-7, 117-81-7, 108-88-3, 100-41-4, 108-10-1, 67-56-1	July 2007	3.8E-3, 3.7E-4, 4.4E-5, 2.2E-5, 5.7E-5,1.1E-4	70	26.5	>
NMFS-F1	17 –CMAP	PM/PM10, SO2, NOx, CO	N/A	July 2007	N/A	06	64	۸
NMFS-F1	17 –CMAP	Methanol, MIBK, Bis(2-ehtylhexyl)phthalate, Ethylbenzene, Toluene, Xylene	67-56-1, 108-10-1, 117- 81-7, 100-41-4, 108-88- 3, 1330-20-7	July 2007	7E-3, 2.5E-3, 9.8E-4, 9.8E-4, 9.8E-4, 9.8E-4,	06	64	>
NMFS-F2	17-CMAP	Methanol, MIBK, Bis(2-ehtylhexyl)phthalate, Ethylbenzene, Toluene, Xylene	67-56-1, 108-10-1, 117- 81-7, 100-41-4, 108-88- 3, 1330-20-7	July 2007	7E-3, 2.5E-3, 9.8E-4, 9.8E-4, 9.8E-4, 9.8E-4,	1030	6.8	^
NMFS-S1	18 - DD	PM/PM10/PM2.5	N/A	July 2007	N/A	02	0.03	æ
7C-2A	19 - AUTO	PM/PM10/PM2.5, Nickel, Lead	N/A	July 2007	Ni 1.2E-4	20	1.04	۸
7C-2B	19 - AUTO	PM/PM10/PM2.5, Nickel, Lead	N/A	July 2007	Ni 1.2E-4	20	1.04	^
NMFS-TFS	20 - TFP	PM/PM10/PM2.5, Lead	N/A	July 2007	N/A	20	54	۸
NMFS-TFS	20 - TFP	Sulfuric acid, Nitric acid, 2-ethanolamine, Hydrochloric acid, Phosphoric acid	7664-93-9, 7697-37-2, 141-43-5,7647-01-0, 7664-38-2	July 2007	7.2E-4,3.9E- 3,5.2E-2,9.2E- 4,1.6E-3	70	54	^
SOLDER1	21 - SOLDER	PM/PM10/PM2.5, Lead, Chrome, Manganese	N/A	N/A	Chr 1.7E-6, Mn 1.1E-4	70	0.03	R
NMFS-B1	21 - Boiler	PM/PM10, SO2, NOx, CO, Lead,	N/A	April 2006	N/A	009	15.29	>



# Title V Permit Application Stack/Vent Information – Form H Bureau of Air Quality Page 2 of 2

			STACK/VENT INFORMATION	INFORMATION				
1. Exhaust Point ID	2. Emission/ Equipment ID	3. Pollutant	4. CAS No. (if applicable)	5. Date last modeled (if Applicable)	6. Modeled Emission Rates (Ib/hr) (if applicable)	7. Stack Gas Exit Temp (degrees F)	8. Stack Gas Exhaust Velocity (ft/sec)	9. Non-Vertical Discharge (H) or Raincap (R)
NMFS-B1	21 - Boiler	Benzene, Formaldehyde, Hexane, Naphthalene, Toluene	71-43-2, 50-00-0, 110- 54-3, 91-20-3, 108-88-3	April 2006	3.5E-5,1.21E- 3,2.9E-2,1E- 5,5.6E-5	009	15.29	>
TOWER	21 – ST	111-Trichloroethane, 11-Dichloroethane,11- Dichloroethylene, Vinyl Chloride	71-55-6,75-34-3,75-35- 4,75-01-4	N/A	0.3, 0.1, 0.016,9.0E-2	70	0.03	Я

			STACK	VENT INFORMAT	STACK/VENT INFORMATION (CONTINUED)				
1. Exhaust	10. Vertical component of	44 LITM E264	42 LITM North	13. Distance	14. Dimensions	14. Dimensions of Plume Obstructing Structure (ft)	cting Structure	15. Stack	16. Stack
Point ID	Stack Exhaust Velocity (ft/sec)			Boundary (ft)	Height	Length	Width	( <del>#</del> )	(#)
1-A21	14.4	693764	3728334	133	45	228	182	33	1.33
15B-1	49.5	693770	3728334	118	45	228	182	35	2.5
15C-1	47.7	693758	3728335	86	45	228	182	35	2.5
MD1C-1	25	693700	3728106	99	36	009	480	37	1.67 x 1.67
MD2C-1	4.1	693716	3728101	145	36	009	480	22	0.667
MD3C-1	26.5	693720	3728101	155	36	009	480	25	1.0
MB2-F1	64	693341	3727899	162	24	260	257	30	2.5
MB2-F2	6.8	693344	3727899	162	24	260	257	28	2
NMFS-S1	19.4	693330	3727951	450	24	260	257	9	0.08
7C-2A	1.04	693773	3728208	621	29	128	89	32	3.45
7C-2B	1.04	693773	3728206	179	29	128	89	32	3.45
MB2-TFS	54.0	693300	3727880	427	24	260	257	35	2.5
SOLDER	N/A	693305	3727844	427	24	260	257	15	0.25
MB2-B1	15.29	693322	3727939	432	24	260	257	35.5	0.833
TOWER	5.23	693890	3728065	99	23.5	141	108	20	2.25



# Title V Permit Application Regulatory Information – Form I Bureau of Air Quality Page 1 of 7

# Please Refer to Instruction / Definitions Pages Before Completing This Form

		EMISSION LIMITS AND STANDARDS (This section summarizes the emission unit emission limits and standards)	IND STANDARDS Until emission limits and stand	ards)	
1. Emission Unit	2. Unit ID	3. Pollutant/Standard	4. Limit	5. Reference Method	6. Applicable Regulation (Regulation)
Facility-wide	14 - 21	Opacity	20%	9 (upon request)	SC Regulation 61-62.5, Standard 4, Section IX
Metallization, TFP	19, 20	Acid Mist Emissions	0.25 lb/hr	N/A	SC Regulation 61-62.5, Standard 4, Section VIII
Facility-wide	14 - 21	Aggregate VOC emissions	249.9 tpy (total); None	N/A	SC Regulation 61-62.70
CMAP Buildup (TO-1)	17	PM	0.5 lb/MMBtu	N/A	SC Regulation 61-62.5, Standard 3, Section I
Boiler	21	Md	0.6 lb/MMBtu	N/A	SC Regulation, 61-62.5, Standard 1, Section II
Boiler	21	S02	3.5 lb/MMBtu	N/A	SC Regulation 61-62.5, Standard I, Section III
Boiler	21	Natural gas usage	None	N/A	TV-1340-0002, Table 6.1; 40 CFR Part 60, Subpart Dc [60.48c(g)(2)]
Raw Materials Manufacturing	14	Dust Collectors A through C pressure drop	1.0" – 5.0" H <sub>2</sub> O	N/A	SC Regulation 61-62.5, Standard 2
Facility-wide	14 - 21	Visible emissions (from processes without control devices)	N/A	N/A	SC Regulation 61-62.5, Standard 4, Section IX
CMAP	17	Adsorption units (AD-2, AD-3 & AD-4) pressure drop	2.0" – 5.0" H <sub>2</sub> O	N/A	SC Regulation 61-62.5, 63.53
CMAP	17	Desorption units (AD-2, AD-3 & AD-4) temperature	350 deg F – 500 deg F	N/A	SC Regulation 61-62.5, 63.53
CMAP	<i>2</i> 1	Thermal oxidizer (TO-1) temperature	1400 deg F – 1800 deg F	N/A	SC Regulation 61-62.5, 63.53
Thin Film Process	20	Scrubber pH	As specified	N/A	SC Regulation 61-62.5, Standard 8, Section III
Thin Film Process	20	Scrubber pressure drop	As specified	N/A	SC Regulation 61-62.5, Standard 8, Section III
Termination	19	PM	25.04 lb/hr	N/A	SC Regulation 61-62.5, Standard 4, Section VIII
Miscellaneous Support	21	Md	37.8 lb/hr	N/A	SC Regulation 61-62.5, Standard 4, Section VIII
Misc. Support E6 and E7	21	НАР	23 PPMvd CO or 70% reduction	N/A	SC Regulation 61-62.5 62.63 by reference, 40 CFR Part 63, Subpart ZZZZ
DHEC 2946 (02/2005)					



# Title V Permit Application Regulatory Information – Form I Bureau of Air Quality Page 2 of 7

	COMPLIANCE AND PERMIT REQUIREMENTS (This section summarizes the emission unit compliance requirements)	MIT REQUIREMENTS	ents)		
2. Unit ID	6. Applicable Regulation (Regulation Citation/Condition)	7. In Compliance (Y/N)	8. Compliance Statement*	9. Compliance Date	10. First Submittal
14-21	SC Regulation 61-62.5, Standard 4, Section IX	<b>&gt;</b>		Already complying	N/A
19, 20	SC Regulation 61-62.5, Standard 4, Section VIII	λ		Already complying	N/A
14 - 21	SC Regulation 61-62.70	<b>\</b>		Already complying	N/A
17	SC Regulation 61-62.5, Standard 3, Section I	Ь		Already complying	N/A
21	SC Regulation, 61-62.5, Standard 1, Section II	Ь		Already complying	N/A
21	SC Regulation 61-62.5, Standard I, Section III	Ь		Already complying	N/A
14	TV-1340-0002, Table 6.1	Ь		Already complying	N/A
14 - 21	TV-1340-0002, Table 6.1	Ь		Already complying	N/A
17	TV-1340-0002, Table 6.1	Ь		Already complying	N/A
17	TV-1340-0002, Table 6.1	Ь		Already complying	N/A
17	TV-1340-0002, Table 6.1	Ь		Already complying	N/A
21	TV-1340-0002, Table 6.1; 40 CFR Part 60, Subpart Dc [60.48c(g)(2)]	Ь		Already complying	N/A
20	TV-1340-0002, Table 6.1	Ь		Already complying	N/A
20	TV-1340-0002, Table 6.1	Ь		Already complying	N/A
19	SC Regulation 61-62.5, Standard 4, Section VIII	Ь		Already complying	N/A
21	SC Regulation 61-62.5 62.63 by reference, 40 CFR Part 63, Subpart ZZZZ	Z		May 3, 2013	December 31, 2013

\*By initialing here, the Responsible Official certifies that this emission unit is in compliance with current applicable requirements and that during the permit term, that the source will meet such requirements on a timely basis, unless a more detailed schedule is expressly required by the applicable requirement.

	MONITORING/APPLICAL (This section summarizes the monitoring and	ABLE REGULATION AND PERMIT/RULE REQUIREMENTS-PART I d reporting requirements. Parts I. III. and IV must be completed for each emission unit)	ILE REQUIREMENTS-PART and IV must be completed for	F I or each emission unit).	
2. Unit ID		4. Limit	12. Required Monitoring	13. Monitoring Frequency	14. Reporting Frequency
14 -21	Opacity	20%	Visual inspection	Upon request	Upon occurrence of test
19, 20	Acid Mist Emissions	0.25 lb/hr	Calculation of acid mist emissions	Upon request	Upon occurrence of test



# Title V Permit Application Regulatory Information – Form I Bureau of Air Quality Page 3 of 7

	Monitoring/AppLicaB (This section summarizes the monitoring and n	MONITORING/APPLICABLE REGULATION AND PERMIT/RULE REQUIREMENTS-PART I arrises the monitoring and reporting requirements. Parts I, II, III, and IV must be completed for each emission unit)	JLE REQUIREMENTS-PART, and IV must be completed for	'I r each emission unit).	
2. Unit ID	11. Pollutant/Parameter	4. Limit	12. Required Monitoring	13. Monitoring Frequency	14. Reporting Frequency
14 - 21	Aggregate VOC emissions	249.9 tpy (total)	Calculation of VOC emissions	Monthly	Semiannual
17	PM	0.5 lb/MMBtu	Calculation of PM emissions	One-time	None required
17	VOC (for temporary CMAP machines)	864 hr/yr	Track hours	Monthly	None required
21	PM	0.6 lb/MMBtu	Calculation of PM emissions	One-time	None required
21	SO2	3.5 lb/MMBtu	Calculation of SO2 emissions	One-time	None required
14	Dust Collectors A through C pressure drop	1.0" – 5.0" H <sub>2</sub> O	Gauge, recordkeeping	Daily, when operating	None required
14 - 21	Visible emissions (from processes without control devices)	N/A	Visual inspection	Daily	None required
17	Adsorption units (AD-2, AD-3 & AD-4) pressure drop	$2.0" - 5.0" \text{ H}_2\text{O}$	Gauge, recordkeeping	Daily, when operating	None required
17	Desorption units (AD-2, AD-3 & AD-4) temperature	350 deg F – 500 deg F	Thermocouple, recordkeeping	Daily, when operating	None required
17	Thermal oxidizer (TO-1) temperature	1400 deg F – 1800 deg F	Thermocouple, recordkeeping	Daily, when operating	None required
21	Natural gas usage	None	Fuel meter; recordkeeping	Monthly	None required
20	Scrubber pH	As specified	Probe, recordkeeping	Daily, when operating	None required
20	Scrubber pressure drop	As specified	Gauge, recordkeeping	Daily, when operating	None required
19	MM	25.04 lb/hr	Calculation of PM emissions	One-time	None required
21	PM	37.8 lb/hr	Calculation of PM emissions	One-time	None required



# Title V Permit Application Regulatory Information – Form I Bureau of Air Quality Page 4 of 7

	Monitoring/Applical (This section	MONITORING/APPLICABLE REGULATION AND PERMIT/RULE REQUIREMENTS-PART II (This section summarizes the monitoring and reporting requirements)	/RuLE REQUIREMENTS-PAF	RT II		
2 2 2	3. or 11. Pollutant/Standard or		15. Recordkeeping	16. Averaging	17	17.Stack Test
Z. UNIT ID	Pollutant/Parameter	4. LIMIT	Frequency	Time	N/A	Frequency
14 - 21	Opacity	20%	Upon occurrence of test	6 minutes	Ν	N/A
19, 20	Acid Mist Emissions	0.25 lb/hr	Upon occurrence of test	1 hour	Ь	Upon request
17,18,20	Aggregate VOC emissions	39.5 tpy (total)	Monthly	N/A	z	N/A
17	PM	0.5 lb/MMBtu	One-time	N/A	Z	N/A
17	Hours of Operation (2 temporary units)	864 hr/yr	Monthly	N/A	Z	N/A
21	PM	0.6 lb/MMBtu	One-time	N/A	Z	N/A
21	802	3.5 lb/MMBtu	One-time	N/A	Z	N/A
90	Dust Collectors A through C pressure drop	1.0" – 5.0" H <sub>2</sub> O	Daily, when operating	N/A	Z	N/A
14 - 21	Visible emissions (from processes without control devices)	N/A	Daily	N/A	Ν	N/A
17	Adsorption units (AD-2, AD-3 & AD-4) pressure drop	2.0" – 5.0" H <sub>2</sub> O	Daily, when operating	N/A	z	N/A
17	Desorption units (AD-2, AD-3 & AD-4) temperature	350 deg F – 500 deg F	Daily, when operating	N/A	Z	N/A
17	Thermal oxidizer (TO-1) temperature	1400 deg F – 1800 deg F	Daily, when operating	N/A	Ν	N/A
21	Natural gas usage	None	Monthly	N/A	Ν	N/A
20	Scrubber pH	As specified	Daily, when operating	N/A	Ν	N/A
20	Scrubber pressure drop	As specified	Daily, when operating	N/A	Z	N/A
19	PM	25.04 lb/hr	One-time	N/A	Z	N/A
21	PM	37.8 lb/hr	One-time	N/A	Ν	N/A

(This section	Monitoring/APPLICA This section summarizes the monitoring and reporting requirements	MONITORING/APPLICABLE REGULATION AND PERMIT/RULE REQUIREMENTS-PART III reporting requirements not described in Parts I & II. Also summarizes applicable regulations the	BLE REGULATION AND PERMIT/RULE REQUIREMENTS-PART III not described in Parts I & II. Also summarizes applicable regulations that no Monitoring and Reporting is needed.)	nitoring and Reporting is needed.)
2. Unit ID	11. Pollutant/Parameter	4. Limit	18. If no monitoring required, why?	19. List any monitoring requirements not listed above
14 - 21	Opacity	20%	Required only upon request of DHEC	N/A
19, 20	Acid Mist Emisions	0.25 lb/hr	Required only upon request of DHEC	N/A
17,18,20	Aggregate VOC emissions	39.5 tpy (total)	Monthly calculations	N/A
DUEC 2016 (02/2005)				

DHEC 2946 (02/2005)



# Title V Permit Application Regulatory Information – Form I Bureau of Air Quality Page 5 of 7

Monitoring and Reporting is needed.)	19. List any monitoring requirements not listed above	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BLE REGULATION AND PERMIT/RULE REQUIREMENTS-PART III not described in Parts I & II. Also summarizes applicable regulations that no Monitoring and Reporting is needed.)	18. If no monitoring required, why?	Y/N	Monthly log	Y/N	Y/N	V/N	Ν/A	Y/N	Daily recording	Daily recording	Daily recording	Y/N	Y/N	Y/N	Y/N
	4. Limit	0.5 lb/MMBtu	864 hr/yr	0.6 lb/MMBtu	3.5 lb/MMBtu	1.0" – 5.0" H <sub>2</sub> O	N/A	2.0" – 5.0" H <sub>2</sub> O	350 deg F – 500 deg F	1400 deg F – 1800 deg F	None	As specified	As specified	25.04 lb/hr	37.8 lb/hr
Monitoring/APPLICAL (This section summarizes the monitoring and reporting requirements in	11. Pollutant/Parameter	Md	Hours of Operation (2 temporary units)	Md	SO2	Dust Collectors A through C pressure drop	Visible emissions (from processes without control devices)	Adsorption units (AD-2, AD-3 & AD-4) pressure drop	Desorption units (AD-2, AD-3 & AD-4) temperature	Thermal oxidizer (TO-1) temperature	Natural gas usage	Scrubber pH	Scrubber pressure drop	Md	Md
(This section	2. Unit ID	17	17	21	21	14	14 - 21	17	17	17	21	20	20	19	21

	Monitor	RING/APPLICABLE I	REGULATION AND Imarizes the monito	/APPLICABLE REGULATION AND PERMIT/RULE REQUIREMENT This section summarizes the monitoring and reporting requirements)	Monitoring/Applicable Regulation and Permit/Rule Requirements-PART IV (This section summarizes the monitoring and reporting requirements)	2			
		21. Potential Uncontrolled	Uncontrolled		23. Potential	24. St	ubject to	24. Subject to CAM Rule (40 CFR 64)?	CFR 64)?
2. Unit ID	20. Description (include equip/process ID)	Emissions	sions	22. Control Fauin ID	Emissions	****	Q.	100000	25. Reason
		Pollutant	Tons/Year	l L	Tons/Year	S D	2	Lxellipt	Exempt?
14 - 21	Facility-wide emission points (Various)	W/A	N/A	N/A	V/N		×		
19, 20	Plating lines (02-A, 02-B)	Y/N	N/A	N/A	V/N		×		
17,18,21	CMAP, CMAP Support, and TFP emission points (Various)	20/	Facility < PSD major source thresholds	AD-1, AD-2, AD-3, TO-1, TFS	39.5	×			



# Title V Permit Application Regulatory Information – Form I Bureau of Air Quality Page 6 of 7

	Monitor	ING/APPLICABLE (This section sun	REGULATION AND organizes the monitor	ILE REGULATION AND PERMIT/RULE REQUIREMENT summarizes the monitoring and reporting requirements)	Monitoring/Applicable Regulation and Permit/Rule Requirements-PART IV (This section summarizes the monitoring and reporting requirements)	≥			
		21. Potential Uncontrolled	Uncontrolled		23. Potential	24. S	ubject to	24. Subject to CAM Rule (40 CFR 64)?	CFR 64)?
2. Unit ID	20. Description (include equip/process ID)	Emissions	sions	22. Control Equip ID	Emissions	****	ON	\$ a mon	25. Reason
		Pollutant	Tons/Year	 	Tons/Year	S D	2	ıdıııəx	Exempt?
17	Thermal oxidizer natural gas fired startup burners	N/A	N/A	N/A	N/A		X		
21	Natural gas fired boiler (B201)	N/A	N/A	N/A	N/A		Χ		
21	Natural gas fired boiler (B201)	N/A	N/A	N/A	N/A		Χ		
14	Raw Material Manufacturing (06-A through 06-D)	All	Each < major source thresholds	DC-A, DC-B, DC-C	N/A			×	Pre control < threshold
14 - 21	Various process without control devices (Various)	N/A	N/A	N/A	N/A		X		
17	CMAP Buildup	VOC; other emissions	127 VOC	AD-1, AD-2, AD-3 & TO-1	14 VOC	X			
21	Boiler (B201)	N/A	N/A	N/A	N/A		Χ		
20	Thin Film Process Scrubbers	All	Each < major source thresholds	TFS	N/A		X		
20	Thin Film Process Scrubbers	All	Each < major source thresholds	TFS	N/A			×	No limit, Pre control < threshold
19	Plating (SBE, BCB, FCT)	N/A	N/A	N/A	N/A		X		
21	Air stripper, Support maintenance, soldering equipment, EGs	N/A	N/A	N/A	N/A		X		

NOTE\* If yes, the applicant must submit additional information in the form of a CAM plan as required under 40 CFR 64



# Title V Permit Application Regulatory Information – Form I Bureau of Air Quality Page 7 of 7

	27. Applicable Regulation Avoidance		SC Regulation 61-62.5, Section H			
VOIDANCE-PART V iit to avoid an applicable regulation)	26. Parameter to Monitor		VOC emissions			
FACILITY-WIDE LIMITS FOR REGULATORY AVOIDANCE-PART V (This section summarizes emission unit(s) covered under a limit to avoid an applicable regulation)	4. Limit (Facility-Wide)		39.5 tpy (total) at NMF			
FACILITY-V (This section summarizes	11. Pollutant/Parameter		Aggregate VOC emissions			
	2. Unit ID (emission unit covered under the limit)		17, 18, 20			

	ADDITION (This section allows for addit)	ADDITIONAL INFORMATION FOR MACT SOURCES-PART VI s for additional information or requirements for sources subject to a	ADDITIONAL INFORMATION FOR MACT SOURCES-PART VI This section allows for additional information or requirements for sources subject to a MACT Standard)
2. Unit ID	28. New or Existing Equipment	29. Control Equip ID	30. List any unit/equipment which is specifically exempt from MACT standards and state why.
14 - 20	N/A	N/A	N/A

	ADDITIONAL INFORMATION FOR MACT SOURCES-PART VII  (This section allows for additional requirements for sources subject to a MACT Standard)
2. Unit ID	31. List Other MACT Requirements: Operation examples, such as, maintenance and monitoring, operational/maintenance & malfunction (OM &M) plan, startup, shutdown, and malfunction (SSM) Plan, leak detection and repair (LDAR), wastewater unit requirements, etc.
14 – 18 & 20	N/A
21	40 CFR Part 63, Subpart ZZZZ. SSM Plan
19	40 CFR Part 63, Subpart WWWWWW, wetting agent/fume suppressant and management practices



#### Title V Permit Application Permit Shield – Form K Bureau of Air Quality Page 1 of 3

#### Please Refer to Instruction / Definitions Pages Before Completing This Form

		PERMIT SHIELI	D	
1.Citation	2. Regulation	3. Applicable (Y/N)	4. Standard Reason Indicator	5. Comments (Use when choosing Indicator "J")
SCDHEC 62.1	Definitions, Permit Requirements, and Emissions Inventory	Y	D	Section contains general information applicable to this facility
SCDHEC 62.1	Prohibition of Open Burning	Υ	D	Generally applicable to all facilities
SCDHEC 62.3	Air Pollution Episodes	N	A,H	Facility not a major source in a non-attainment area
SCDHEC 62.4	Hazardous Air Pollution Conditions - General	Y	D	Generally applicable to all facilities
SCDHEC 62.4	Hazardous Air Pollution Conditions	Υ	D	Generally applicable to all facilities
SCDHEC 62.5 Std 1, Sec 1A	Emissions from Fuel Burning Operations – Visible Emissions Existing Sources	N	J	Units installed after February 11, 1971
SCDHEC 62.3, Std 1, Secs 1B – 1D	Emissions from Fuel Burning Operations – New Sources, Special Provisions, Test Methods	Y	I	
SCDHEC 62.5 Std 1, Sec IIA	Emissions From Fuel Burning Operations – PM Emissions Allowable Discharge	Y	1	
SCDHEC 62.5 Std 1, Sec IIB	Emissions From Fuel Burning Operations – PM Emissions Special Provisions	N	J	Units installed after February 11, 1971
SCDHEC 62.5 Std 1, Sec IIC	Emissions From Fuel Burning Operations – SO2 Emissions Allowable Discharge	Y	1	
SCDHEC 62.5, Std 1, Sec IV	Emissions From Fuel Burning Operations – Opacity Monitoring Requirements	N	G	
SCDHEC 62.5, Std 1, Sec V	Emissions From Fuel Burning Operations – Exemptions	N	В	
SCDHEC 62.5, Std 1, Sec VI	Emissions From Fuel Burning Operations – Periodic Testing	N	В	
SCDHEC 62.5, Std 2	Ambient Air Quality Standards	Υ	D	
SCDHEC 62.5, Std 3, Sec I	Waste Combustion & Reduction – Applicability	Y	I	
SCDHEC 62.5, Std 3, Sec II	Waste Combustion & Reduction - General	N	J	Does not supersede any other State or Federal requirement, unless the limit is more restrictive.
SCDHEC 62.5, Std 3, Sec III	Waste Combustion & Reduction – Emission Limitations and Operating Requirements	Y	I	
SCDHEC 62.5, Std 3, Sec IV	Waste Combustion & Reduction – Notification Requirements and Compliance Schedules	Y	I	
SCDHEC 62.5, Std 3, Sec V	Waste Combustion & Reduction – Waste Analysis	N	J	Meets exemption via air dispersion modeling
SCDHEC 62.5, Std 3, Secs VI and VII	Waste Combustion & Reduction – Continuous Monitoring Requirements	N	А	
SCDHEC 62.5, Std 3, Sec VIII	Waste Combustion & Reduction – Periodic Testing	Y	1	
SCDHEC 62.5, Std 3, Sec IX	Waste Combustion & Reduction – Operator Periodic Training Requirements	N	J	Exempt per the operating permit
SCDHEC 62.5, Std 3.1	Medical Waste Incinerator	N	В	
SCDHEC 62.5 Std 4, Sec I	Emissions From Process Industries	Y	I	
SCDHEC 62.5 Std 4, Secs II – VII & XI - XII	Emissions From Process Industries	N	В	



#### Title V Permit Application Permit Shield – Form K Bureau of Air Quality Page 2 of 3

		PERMIT SHIELI	)	
1.Citation	2. Regulation	3. Applicable (Y/N)	4. Standard Reason Indicator	5. Comments (Use when choosing Indicator "J")
SCDHEC 62.5 Std 4, Secs VII - X	Emissions From Process Industries – Other Manufacturing, Visible Emissions, Non-Enclosed Operations	Y	I	
SCDHEC 62.5 Std 5	Volatile Organic Compounds	N	В	
SCDHEC 62.5 Std 5.1	LAER Applicable to Volatile Organic Compounds	N	J	Net VOC emission increases not greater than 100 tpy since July 1, 1979
SCDHEC 62.5 Std 6	Alternative Emission Limitations	N	J	Did not apply for alternative emission limits
SCDHEC 62.5 Std 7	Prevention of Significant Deterioration	N	J	With modifications, facility requests removing PSD Synthetic Minor limit as they are now a true PSD minor source. PSD will only apply if future modifications are above PSD significance emission levels.
SCDHEC 62.5 Std 8, Secs I & II	Toxic Air Pollutants – General Applicability & Toxic Air Emissions	Y	I	
SCDHEC 62.5 Std 8, Sec III	Toxic Air Pollutants – Controls	N	J	Air dispersion modeling indicates controls not required
SCDHEC 62.5 Std 8, Sec IV	Toxic Air Pollutants – Source Test Requirements	N	J	Required only if requested by SCDHEC
SCDHEC 62.5 Std 8, Sec V	Toxic Air Pollutants – Recordkeeping	Y	1	
SCDHEC 62.6, Secs I &	Control of Fugitive Particulate Matter – Control in Non-Attainment Areas & Control in Problem Areas	N	H	
SCDHEC 62.6, Sec III	Control of Fugitive Particulate Matter – Control Statewide	Y	D	
SCDHEC 62.7	Good Engineering Practice Stack Height	Υ	D	
SCDHEC 62.63	National Emission Standards For Hazardous Air Pollutants (NESHAP)	Y	F	Facility previously major HAP source. Emissions currently below threshold, however, still defined as a major source facility
SCDHEC 62.70	Title V Operating Permit Program	Y	1	
SCDHEC 62.72	Acid Rain	N	В	
40 CFR Part 60, Subpart A	NSPS General Provisions	Y	I	
40 CFR Part 60, Subparts B – KKK (except Dc)	Adoption and Submittal of State Plans for Designated Facilities, Emission Guidelines and Compliance Times for specific sources	N	В	
40 CFR Part 60, Subpart Dc	NSPS for Small Industrial-Commercial- Institutional Steam Generating Units	Y	1	
40 CFR Part 61, Subpart A	NESHAP General Provisions	Y	F	Potentially applicable if Subpart M applies
40 CFR Part 61, Subpart B – FF (except M)	NESHAP for Specific compounds and processes	N	В	
40 CFR Part 61, Subpart M	NESHAP for Asbestos (including work practices)	Y	J	Only when work at the facility involves asbestos
40 CFR Part 63, et. seq	NESHAPs for specific processes	Y	I	Applicable to emergency generators, Subpart ZZZZ
40 CFR Part 63, Subparts A and B	NESHAP General Provisions and 112(g) control technology requirments	Y	I	CMAP
40 CFR Part 64	Compliance Assurance Monitoring	Υ	1	



#### Title V Permit Application Permit Shield – Form K Bureau of Air Quality Page 3 of 3

		PERMIT SHIELD	ס	
1.Citation	2. Regulation	3. Applicable (Y/N)	4. Standard Reason Indicator	5. Comments (Use when choosing Indicator "J")
40 CFR Part 68	Chemical Accident Provisions	N	1	Regulated substances are below threshold planning quantities; General Duty Clause does apply however
40 CFR Part 70	State Operating Permit Program	Υ	1	
40 CFR Part 72	Acid Rain Program	N	В	
40 CFR Part 73	Sulfur Dioxide Allowance System	N	В	
40 CFR Part 74	Sulfur Dioxide Opt-Ins	N	В	
40 CFR Part 75	Continuous Emission Monitoring	N	В	
40 CFR Part 76	Acid Rain Nitrogen Oxides Emission Reduction Program	N	В	
40 CFR Part 77	Excess Emissions	N	В	
40 CFR Part 78	Appeal Procedures for Acid Rain Program	N	В	
40 CFR Part 79	Registration of Fuels and Fuel Additives	N	В	
40 CFR Part 80	Regulation of Fuels and Fuel Additives	N	В	
40 CFR Part 81	Designation of Areas for Air Quality Control Regions	N	J	Facility located in an attainment area
40 CFR Part 82, Subparts A – G (except Subpart F)	Stratospheric Ozone – Production, Motor Vehicles, etc.	N	В	
40 CFR Part 82, Subparts F	Stratospheric Ozone – Recycling and Emissions Reductions	Y	J	AVX personnel service plant air conditioners and cooling equipment

	STANDARD REASONS
Indicator	Standard Reason
А	The facility is not in the applicable source category
В	The specified source/process is not present at the facility
С	The facility/unit was constructed or last modified prior to the effective date of the rule
D	Applies to all facilities
Е	Rule/Standard proposed, but not final/effective
F	The facility/unit emits pollutants at a level less than established by the rule
G	The facility/unit design capacity or production capacity is less than established by the rule.
Н	The facility is not in a special control/non-attainment area.
I	Applicable to facility; requirements are listed in permit application and facility has certified compliance.
J	Other (explain)

#### **APPENDIX E**

**Supporting Emission Calculations** 

 ${\bf TABLE\,10}$  Summary Of Potential Criteria and Greenhouse Gas Emissions AVX Corporation, Myrtle Beach, SC

Emission Unit	Donostmont									n	Uncontrolled Emissions	Emissions									
ID No.	Department	P.	PM	PM-10	-10	PM-2.5	2.5	$so_2$		NOx		00		VOC		$CO_2$		$N_2O$		Methane	ne
		(tpy)	(Ib/hr)	(tpy)	(1b/hr)	(tpy)	(1b/hr)	(tpy)	(lb/hr)	(tpy)	(1b/hr)	(tpy)	(lb/hr)	(tpy) (l	(Ib/hr)	(tpy)	(Ib/hr)	(tpy)	(Ib/hr)	(tpy)	(Ib/hr)
14	RMM	0.57	0.13	0.37	80'0	0.37	80.0										-				
15	Slip Mfg													24.48	5.59				,		
16	Metals	1.17	0.27	0.77	0.17	0.77	0.17							6.16	1.41						
17	CMAP Buildup	0.03	0.01	0.03	0.01	0.03	0.01	0.003	0.001	0.44	0.10	0.37	60.0	127.29	42.32	528.00	122.40	0.01	2.24E-03	0.01	2.35E-03
18	CMAP Support	38.23	8.73	38.23	8.73	38.23	8.73						,	1.19	0.27			,	,		,
19	Metallization		,		,						,			5.17	1.18						
19	Metallization - Electroplating	1.38E-03	3.15E-04	1.38E-03	3.15E-04	1.38E-03	3.15E-04														,
20	Thin Film	3.26	0.75	3.26	0.75	3.26	0.75							2.07	0.47						,
21	Misc Support - APTC (Insig)	,					,						,	86.0	0.22			,	,		,
21	Misc Support - Boiler	0.55	0.12	0.55	0.12	0.55	0.12	0.04	0.01	7.19	2.00	6.04	1.38	0.11	0.40	8624.99 2	2400.00	0.16	0.04	0.17	0.05
21	Misc Support - Emergency Gens. (Insig)	0.43	1.70	0.43	1.70	0.43	1.70	0.40	1.59	6.05	24.19	1.30	5.21	0.48	1.92	224.89	81.88		,		,
21	Misc Support - Soldering	0.01	0.002	0.01	0.00	0.01	0.00		,				,		,		,		,	,	,
21	Misc Support - Stripping Tower (Insig)	1	1	1	-	-	-	-	-	1	-	-		2.19	0.50	-	-	-	-	-	-
	TOTALS	44.25	11.71	43.64	11.57	43.64	11.57	0.44	1.60	13.67	26.29	7.71	89.9	170.11	54.28	9377.89	2604.28	0.17	0.05	0.18	0.05

Emission Unit											Controlled Emissions	missions									
ID No.	Department	PM	М	PM-10	.10	-MA	A-2.5	$so_2$	٦	NOx	_	CO		VOC		CO2		$N_2O$		Methane	me
		(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(Ib/hr)	(tpy)	(lb/hr)	(tpy)	(Ib/hr)	(tpy)	(Ib/hr)	(tpy)	(Ib/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)
14	RMM	3.90E-05	5.70E-01	1.12E-04	2.55E-05	1.12E-04	2.55E-05														
15	Slip Mfg							,						24.48	5.59						,
16	Metals	1.17	0.27	0.77	0.17	0.77	0.17			,	,			6.16	1.41		,				
17	CMAP Buildup	0.03	0.01	0.03	0.01	0.03	0.01	0.003	0.001	0.44	0.10	0.37	60.0	14.59	3.73	528.00	122.40	0.01	2.24E-03	0.01	2.35E-03
18	CMAP Support	0.19	0.04	0.19	0.04	0.19	0.04							1.19	0.27						
19	Metallization							,						5.17	1.18						,
19	Metallization - Electroplating	1.38E-03	3.15E-04	1.38E-03	3.15E-04	1.38E-03	3.15E-04								,			,	,	,	
20	Thin Film	0.03	0.01	0.03	0.01	0.03	0.01							1.05	0.24						
21	Misc Support - APTC (Insig)													86.0	0.22						
21	Misc Support - Boiler	0.55	0.12	0.55	0.12	0.55	0.12	0.04	0.01	7.19	2.00	6.04	1.38	0.11	0.40	8624.99	2400.00	0.16	0.04	0.17	0.05
21	Misc Support - Emergency Gens. (Insig)	0.43	1.70	0.43	1.70	0.43	1.70	0.40	1.59	6.05	24.19	1.30	5.21	0.48	1.92	224.89	81.88				,
21	Misc Support - Soldering	0.01	1.70	0.01	1.70	0.01	1.70														
21	Misc Support - Stripping Tower (Insig)	-	-				-			-	-			2.19	0.50		-			-	
	TOTALS	2.41	4.42	2.00	3.76	2.00	3.76	0.44	1.60	13.67	26.29	7.71	89.9	56.40	15.45	3777.89	2604.28	0.17	0.05	0.18	0.05

TABLE 11
Potential HAP/TAP Emission Summary - Non-Exempt Sources Manufacturing Emissions AVX Corporation, Myrtle Beach, SC

				Emission Unit				·	
НАР/ТАР	15	16	17	19	20	21	21	Individual	Aggregat
HAP/TAP	Slip Mfg	Metals	CMAP Buildup	Metallization	Thin Film	Strip. Twr/Solder	Boiler	Totals	Total
				Cont	rolled Emission	s (ton/yr)			
1-Methoxy-2-propanol	-	-	-	-	5.29E-03	-	-	5.29E-03	
2-Ethanolamine	-	-	-	-	2.27E-01	-	-	2.27E-01	
Bis (2-ethylehexyl) Phthalate	1.30E-01	4.88E-03	0.02	-	-	-	-	1.58E-01	
Benzene	-	-	-	-	-	-	1.51E-04	1.51E-04	
Chrome (assumed +6)	-	-	-	-	-	7.48E-06	-	7.48E-06	
Dipropylene glycol dimethyl ether	-	-	-	-	4.75E-03	-	-	4.75E-03	
Ethyl Benzene	-	2.88E-04	0.02	-	-	-	-	2.33E-02	
Ethylidene Dichloride	-	-	-	-	-	0.48	-	4.82E-01	
Formaldehyde	-	-	-	-	-	-	5.39E-03	5.39E-03	
Hexane	-	-	-	-	-	-	1.29E-01	1.29E-01	
Hydrochloric Acid	-	-	-	-	4.02E-03	-	-	4.02E-03	
Hydrofluoric Acid	-	-	-	-	7.67E-04	-	-	7.67E-04	
Lead	-	-	-	7.50E-06	2.92E-04	9.32E-05	3.59E-05	4.29E-04	
Manganese	-	-	-	-	-	4.86E-04	-	4.86E-04	
Methyl Alcohol	7.70E-03	1.42E-03	0.19	0.07	-	-	-	2.69E-01	
Methyl Isobutyl Ketone	4.06E-03	7.49E-04	0.09	0.04	-	-	-	1.32E-01	
Naphthalene	-	-	-	-	-	-	4.38E-05	4.38E-05	
Nickel	-	-	-	1.08E-03	-	-	-	1.08E-03	
Nitric Acid	-	-	_	-	1.70E-02	-	_	1.70E-02	
Phosphoric Acid	-	-	-	-	6.98E-03	-	-	6.98E-03	
Polycyclic Organic Matter	-	-	-	-	-	-	6.34E-06	6.34E-06	
Sulfuric Acid	-	-	-	-	3.16E-03	-	-	3.16E-03	
Toluene	-	5.76E-04	0.02	-	-	-	2.44E-04	2.38E-02	
Trichloroethylene (TCE)	-	-	-	-	-	1.32	-	1.32E+00	
Vinyl Chloride (Chloroethylene)	-	-	-	-	-	0.39	-	3.95E-01	
Kylene	2.31E-02	0.05	0.02	-	-	-	-	9.27E-02	
•									3.30

Note: The highest emitted single HAP is xylene.

#### Emission Unit 14

#### Raw Materials Manufacturing Emissions AVX Corporation, Myrtle Beach, SC

UNIT 14 - Particulate Matter Emissions from RMM Processing

Process	Amount Processed	Potential	Pollutant	Emission Factor		trolled sions	Controlled F	emissions <sup>2</sup>	Std. 4 Process Weight Rule
	2006 (tpy)	Usage (tpy)		(lb/ton) <sup>1</sup>	(lb/yr)	(tpy)	(lb/hr)	(tpy)	(lb/hr) <sup>4</sup>
Grinders, Mills, and Prillers	277	318	PM	0.72	229.2	0.11	7.85E-06	3.44E-05	
Mixers	1,100	1,265	PM	0.72	910.8	0.46	3.12E-05	1.37E-04	
TOTAL					1140.0	0.57	3.90E-05	1.71E-04	1.52
Grinders, Mills, and Prillers	277	318	PM10/PM2.5	0.47	149.6	0.07	5.12E-06	2.24E-05	
Mixers	1,100	1,265	PM10/PM2.5	0.47	594.6	0.30	2.04E-05	8.92E-05	
TOTAL					744.2	0.37	2.55E-05	1.12E-04	

#### Notes:

- 1. Use AP-42 Emission Factor from cement bin loading Section 11.12
- 2. Three baghouses control emissions from RMM, the lowest efficiency is 99.97%.
- 3. All PM emissions from the Vat loading are accounted for in the Grinders, Mills and Mixers.
- 4. Based on a 4,000,000 lb/yr front-end througut design limit in the RMM department.

# TABLE 13 Unit 15

Slip Manufacturing Emissions AVX Corporation, Myrtle Beach, SC

UNIT 15 - VOC Emission from Slip Manufacturing (Slip Manufacturing Mills and Slip Manufacturing Mixers)

Solvents Used in Slip Dept.	Use Type	Actual Slip Department Use (2006) <sup>1</sup> (gal)	Potential Slip Department Use (gal) <sup>2</sup>	% of Usage Emitted³	lb/gal (VOC)	Total VOC Emissions (lb/yr)	Total VOC Emissions (tpy)
PGME	Process	55	63.25	10%	7.7	49	0.02
Butyl Cellusolve	Process	770	988	10%	7.5	664	0.33
BC/PM	Process	43,010	49,462	10%	7.57	37,442	18.72
DiOctylPhthalate	Process	275	316	10%	8.22	260	0.13
Xylene <sup>4</sup>	Process	55	63	10%	7.29	46	0.02
Iso Spirits <sup>5</sup>	Cleaning	55	63.25	20%	6.23	78.8095	0.04
Bio-Act113	Cleaning	1210	1,392	100%	7.18	9,991	5.00
Denatured Alcohol	Cleaning	275	316	20%	6.76	428	0.21
Totals						48,959	24.48
Notes:							

1. Based on actual 2006 usage data from AVX.

2. Potential emissions based on 2006 usage + 15%

3. 10% or 20% losses are primarily fugitive and are conservative estimates established from communications between AVX and DHEC. The balance remains in the electrode ink, termination paste, or waste.

4. Xylene is used in three slip solutions as a dispersant at 1% by weight in the mixtures. This equates to approximately 0.02% of all solutions. 10% emitted is very conservative estimate.

5. Iso Spirits was not used in Slip in 2006, 55 gallons used in each of 2004 and 2005 and is included to capture the potential material use.

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Constituent	HAP/TAP	Maximum % wt in Solvents Used (Worst Case)	lbs of HAP (Worst Case)	tpy of HAP (Worst Case)
s (2-ethylehexyl) Phthalate <sup>1</sup>	HAP/TAP	100	260.0	1.30E-01
Aethyl Alcohol²	HAP/TAP	3.6	15.4	7.70E-03
Aethyl Isobutyl Ketone²	HAP/TAP	1.9	8.12	4.06E-03
Kylene	HAP/TAP	100	46.11	2.31E-02

1. Contained in DiOctylPhthalate

2. Contained in Denatured Alcohol

#### Unit 16

#### Metals Manufacturing Emissions - VOC/HAP AVX Corporation, Myrtle Beach, SC

UNIT 16 - VOC Emissions from Metals Department (Metal Mills and Metal Mixers)

Solvents Used in Metals	Use Type	Actual Metal Department Use (2006) <sup>1</sup> (gal)	Potential Metal Department Use (gal) <sup>2</sup>	% of Usage Emitted <sup>3</sup>	lb/gal (VOC)	Total VOC Emissions (lb/yr)	Total VOC Emissions (tpy)
Terpineol	Process	8,690	9,994	10%	7.79	7,785	3.89
Dipentene	Process	55	63	100%	7.21	456	0.23
Iso Spirits	Cleaning	2,365	2,720	20%	6.23	3,389	1.69
Denatured Alcohol	Cleaning	55	63	20%	6.23	79	0.04
Xylene	Process	110	127	10%	7.26	92	0.05
Butyl Cellusolve	Process	0	15	10%	7.5	11	0.006
Southpart K Solvent	Process	0	15	100%	6.5	98	0.05
Diethylene Glycol Dibutyl Ether	Process	0	15	100%	7.38	111	0.06
DiOctylPhthalate	Process	0	15	10%	6.5	10	0.005
Mineral Spirits Type 66	Process	385	443	10%	6.51	288	0.14
Total		11,660.00	13,469		69.11	12,318	6.16

#### Notes:

- 1. Based on actual peak usage in 2006 data from AVX.
- 2. Potential emissions based on 2006 usage + 15%. Butyl cellusove, Southpart K, DGDE, and DOP were not used in 2006. Since they were used in the past, 15 gal future usage was assumed.
- 3. 10% or 20% losses are primarily fugitive and are conservative estimates established from communications between AVX and DHEC. The balance remains in the electrode ink, termination paste, or waste.

UNIT 16 - HAP/TAP Emissions From Metals Department

Constituent	HAP/TAP	Maximum % wt in Solvents Used (Worst Case)	lbs of HAP (Worst Case)	tpy of HAP (Worst Case)
Xylene, Mixed Isomers <sup>1</sup>	HAP/TAP	100	91.8	0.05
Xylene, Mixed Isomers <sup>2</sup>	HAP/TAP	0.5	1.44	7.21E-04
Total Xyler	ne		93.28	0.05
Toluene <sup>2</sup>	HAP/TAP	0.4	1.15	5.76E-04
Ethyl Benzene <sup>2</sup>	HAP/TAP	0.2	0.58	2.88E-04
Bis (2-ethylehexyl) Phthalate <sup>3</sup>	HAP/TAP	100	9.75	0.005
Methyl Alcohol <sup>4</sup>	HAP/TAP	3.6	2.84	0.001
Methyl Isobutyl Ketone <sup>4</sup>	HAP/TAP	1.9	1.50	0.001
Total				0.05

#### Notes:

- $1.\ Used$  as process solvent and contained in Mineral Spirits Type 66
- 2. Contained in Mineral Spirits Type 66
- 3. Contained in DiOctylPhtalate
- 4. Contained in Denatured Alcohol

#### June 25, 2009 Metals Source Test Results Ink Milling

Consolidated Process Ink Formulation	% by wt.
Ni Powder	43.21
Barium Titanate Powder	9.79
Ethyl Cellulose Binder	2.30
Terpineol	44.47
DOP	0.23

Total Ink processed (g)

Total Solvent processed in ink (g)

Total Solvent processed in ink (lb)

Total Solvent processed in ink (lb)

Source test time (minutes)

Solvent processed during test (lb/hr)

Ave. Measured Emission Rate (lb/hr as carbon)

Milled ink emission factor (lb VOC/lb solvent)

49240.5

48.3

90 (Three 30 minute runs)

32.2

Ave. Measured Emission Rate (lb/hr as carbon)

0.036

Note: Percentage loss factors are more conservative than source test results. Percentage loss factors are used in the facility emission estimates.

#### Unit 16

#### Metals Manufacturing Emissions - PM AVX Corporation, Myrtle Beach, SC

UNIT 16 - PM Emissions from Metals Department (Metal Mills and Metal Mixers)

Process	Process Processed	Loss Rate <sup>1</sup> (lb/ton) Pollutant	Pollutant	Uncontrolled	Emissions <sup>2</sup>	Weight Rule	
1100033	(tpy)	Loss Kate (lb/toll)	Tonutant	(1b/hr)	(tpy)	(lb/hr) <sup>3</sup>	
Mills/Mixers	3,257.00	0.72	PM	0.27	1.17	2.80	
Mills/Mixers	3,257.00	0.47	PM10/PM2.5	0.17	0.77		

#### Notes:

- $1. \ Loss \ rate for mixers is based on AP-42\ 5th edition\ 11.12-1 for loading of cement into bins of 0.72\ lb/ton. \ PM emissions only occur during loading. Solvent is added during mixing so no PM is produced.$
- 2. There is no PM control in Metals  $\,$
- 3. Based on a department design throughput of 12,300 kg/day

#### TABLE 16 UNIT 17 CMAP Emissions AVX, Myrtle Beach, SC

#### UNIT 17 - VOC Emissions from CMAP Manufacturing

#### Mass balance and control information:

- 0.85 Fraction slip actually applied to chip (the remaining 15% is collected for reclaim)
- 0.3032 Fraction of VOC in slip (from the MSDS sheets)
- $0.01\,$  Fraction of VOC emitted as room fugitives (engineering estimate)
- $0.005\,$  Fraction of VOC emitted as fugitive post chip manufacturing (engineering estimate)
- 0.985 Adsorber/Desorber/Thermal oxidizer System destruction efficiency (February 26, 2009 Source Test)<sup>1</sup>
  - 70 Slip usage rate (kg slip/machine/day)
  - 24 Number of CMAP machines<sup>2</sup>
- 0.67 Potential operating hours factor (32 hrs/48 hrs)<sup>3</sup>

Total VOC prior to thermal oxidizer in the CMAP process:	116.15 TPY	39.78 lb/hr
Manufacturing fugitive VOC emissions:	1.16 TPY	0.40 lb/hr
Post manufacturing fugitive VOC emissions <sup>4</sup> :	0.58 TPY	0.20 lb/hr
Total VOC evolved during the CMAP process (after Thermal Oxidizer, less fugitives):	1.72 TPY	0.59 lb/hr
Total Process VOC Emissions from CMAP process	3.46 TPY	1.18 lb/hr

#### Notes:

- 1. The February 2006 source test resulted in an overall 99.5% control efficiency. AVX will use 98.5% in emission rate calculations for conservatism.
- 24 machines includes two medical machines that will remain in the original MB1 location through the majority of 2010 for qualification product purposes (See Table 16).
- ${\it 3.\ AVX/DHEC\ communications.\ CMAP\ equipment\ cannot\ operate\ 24/7.}$
- 4. An estimate of residual VOC emissions after chip manufacturing emitted in green chip step prior to the kiln room.

#### UNIT 17 - HAP/TAP Emissions from CMAP Manufacturing

НАР/ТАР	Max % HAP by wt. in Slip/Ink	CMAP Fugitive Uncontrolled Emissions (TPY)	CMAP Controlled Point Source Emissions (TPY)	CMAP Total Emissions (TPY)	CMAP Total Emissions (lb/hr)
Toluene	0.5	1.44E-02	8.58E-03	2.30E-02	7.87E-03
Ethyl Benzene	0.5	1.44E-02	8.58E-03	2.30E-02	7.87E-03
Bis (2-ethylehexyl) Phthalate	0.5	1.44E-02	8.58E-03	2.30E-02	7.87E-03
Xylene	0.5	1.44E-02	8.58E-03	2.30E-02	7.87E-03
Methyl Alcohol	3.60	1.04E-01	6.18E-02	1.65E-01	5.66E-02
Methyl Isobutyl Ketone	1.90	5.47E-02	2.21E-02	7.67E-02	2.63E-02
Total		0.22	0.12	0.33	1.14E-01

#### UNIT 17 - Fugitive VOC Emissions from CMAP Manufacturing Cleaning

Cleaning Materials Used	Actual 2006 Department Use (gal)	Potential Department Use (gal) <sup>2</sup>	% of Usage Emitted	lb/gal (VOC)	Total VOC Emissions (lb/yr)	Total VOC Emissions (tpy)
Iso Spirits	11,220	12,903	20%	6.23	16,077	8.0
n-Butyl Acetate <sup>1</sup>	165	190	20%	7.34	279	0.1
BC/PM	2,695	3,099	20%	7.57	4,692	2.3
Denatured Ethyl Alcohol	770	886	20%	6.59	1,167	0.6
Total	14,850.00	17,078		27.73	22,215	11.1

#### Notes:

#### UNIT 17 - HAP/TAP Emissions from CMAP Manufacturing Cleaning

Constituent	HAP/TAP	Maximum % wi in Solvents Used (Worst Case)	lbs of HAP (Worst Case)	tpy of HAP (Worst Case)
Methyl Alcohol <sup>1</sup>	HAP/TAP	3.6	42.02	2.10E-02
Methyl Isobutyl Ketone <sup>1</sup>	HAP/TAP	1.9	22.17	1.11E-02
Total				0.03

#### Notes:

1. Contained in Denatured Alcohol

N-butyl acetate recently replaced xylene as a CMAP cleaning solvent. Since xylene was not used in 2006, an average of previous year usages was assumed.

#### TABLE 17 UNIT 17 CMAP Emissions AVX, Myrtle Beach, SC

#### UNIT 17 - Emission from Ancillary VOC Control Startup Burner

Fuel Combustion: FluiSorb Startup Burner

Unit Designation: NMF-FB1

**Burner Information:** 

Average Firing Rate: 1 MMBtu/hr MMBtu/hr Maximum Firing Rate: 1 Fuel Heat Content: 1,020 Btu/scf Maximum Fuel Usage: 1,020 scf/hour Maximum Fuel Usage: 8.8 MMscf/yr Maximum Operating Schedule: Assumed continuous

Not supplemented by process VOC

Pollutant	<b>Emission Factors</b> <sup>1</sup>	Potential E	missions (Unc.)
	(lb/MMscf)	(lb/hr)	(tpy)
PM/PM10/PM2.5	7.6	0.01	0.03
$SO_2$	0.6	0.001	0.003
NOx	100	0.10	0.44
CO	84	0.09	0.37
VOC	5.5	0.01	0.02
$CO_2$	120000	122.40	528.00
$N_2O$	2.2	0.002	0.01
Methane	2.3	0.002	0.01

Note:

<sup>1.</sup> AP-42, Section 1.4, Tables 1.4-1 and 1.4-2

#### UNIT 18

#### **CMAP Support Emissions**

AVX, Myrtle Beach, SC

#### UNIT 18 - Particulate Matter Emission from Dry Dicing

#### Assumed mass balance and control information:

Dust Recovered:	575.0	kg/month/dicer	Estimated baghouse material recovery + 15%
Control efficiency:	99.5%		April 1, 1998 Title V permit application
PM generated:	577.9	kg PM/month/dic	er
PM Uncontrolled	7.65	ton/year/dicer	
Controlled PM Emissions:	2.89	kg PM/month/dic	er
Number of Dry Dicers:	5		
Processing Rate:	106	lbs/day/machine (	(48 kg/day/machine)
<b>Total Processing Rate:</b>	0.011	tons per hour	

#### Summary of Potential Process Emissions <sup>1</sup>

	Cont	rolled	Uncon	trolled
<b>Emission Source</b>	PM Emissions	PM Emissions	PM Emissions	PM Emissions
	(lb/hr)	(tpy)	(lb/hr)	(tpy)
Dicing Baghouse	0.04	0.19	8.73	38.23

#### Notes

#### **Process Weight Rule Computation**

Parameter	Value	Units
Material per Hour (P)	0.011	tons/hour
Process Weight Rate, 4.10(P) <sup>0.67</sup>	0.20	lb PM/hr

<sup>1.</sup> Particulate matter emissions are PM, PM10, and PM2.5

#### UNIT 18

#### **CMAP Support Emissions Continued**

AVX, Myrtle Beach, SC

#### UNIT 18 - VOC Emissions from Kiln Room

Burnout oven emissions based on source testing

Source Test Date: June 25, 2009 Burnout Oven: GB201 No. of pans in charge: 19 No. of chips in pans: 1,010,960 Chips/pan: 53,208 Oven pan capacity: 30 Max. No. of chips.: 1,596,253 Actual to Potential Linear Factor: 1.58

#### Test Results Summary

	Test 1	Test 2
	lb/hr (as carbon)	lb/hr (as carbon)
Run 1	0.0009	0.016
Run 2	0.0009	0.013
Run 3	0.0011	0.013
Test Average	0.0010	0.0140
Linear Adj. (Potential)	0.0015	0.0221

#### **Burnout Batch Cycle Emissions**

T. ( C. D.)	Oven Cycle Temp.	<b>Emission Rate</b>
Temperature Curve Points	(°F)	(lb/hr)
Point 1 (start)	230	0
Point 2 (Test 1)	$409^{1}$	0.0015
Point 3 (Test 2)	$496^{1}$	0.0221
Point 4 (end)	100	0
Cycle Average	e	0.006

#### Note:

#### Worse Case Cycle Emissions

Cycle Average lb/hr per oven	0.006
Total No. of Burnout Ovens	46
Potential Department (lb/hr)	0.27
Potential Department (lb/yr)	2,381
Potential Department (ton/yr)	1.19

<sup>1.</sup> Averages of oven temperatures during Test 1 and Test 2 testing times.

#### Table 20

#### UNIT 19

#### Termination Department Emissions AVX, Myrtle Beach, SC

#### Unit 19 - VOC Emissions from Termination Paste

	2006 Usage <sup>1</sup>	Potential Usage <sup>2</sup>
Data	(1b/yr)	(1b/yr)
Termination Department Paste Delivered (lb/yr)	34,149	39,271
VOC Content Silver Paste (percent)	22%	22%
Termination Reclaim & Waste (lb/year) <sup>3</sup>	18,444	18,444
VOC (Terpineol) Emissions (tpy)	1.73	2.29

#### Notes:

- 1. 2006 Production data provided by AVX
- 2. 2006 data plus 15%
- 3. The potential reclaim amount was not increased by 15% as a conservative approach.

#### Unit 19 - VOC Emissions From Termination Department Cleaning

Cleaning Solvents Used in Termination	2006 Department Use <sup>1</sup> (gal)	Potential Department Use <sup>2</sup> (gal)	% of Usage Emitted <sup>3</sup>	lb/gal (VOC)	Total VOC Emissions (lb/yr)	Total VOC Emissions (tpy)
Propyl Propionate	3,685	4,238	20%	7.35	6,229	3.1
Denatured Alcohol	2,640	3,036	20%	6.76	4,105	2.1
Tota	1				10,334	5.2

#### Notes:

- 1. Production data provided by AVX
- 2. 2006 data plus 15%
- 3. 20% loss factor is fugitive emissions based on conservative estimates from knowledge of material use. The balance is waste.
- 4. Propyl propionate recently replaced xylene as a Termination cleaning solvent. The amount of xylene used in 2006 was assumed equal to propyl propionate usage.

#### Unit 19 - HAP/TAP Emissions From Termination Department Cleaning

Constituent	НАР/ТАР	Maximum % wt in Solvents Used (Worst Case)	lbs of HAP (Worst Case)	tpy of HAP (Worst Case)
Methyl Alcohol <sup>1</sup>	HAP/TAP	3.6	147.8	0.07
Methyl Isobutyl Ketone <sup>1</sup>	HAP/TAP	1.9	77.99	0.04

#### Notes:

1. Contained in Denatured Alcohol

#### UNIT 19

#### Termination Emissions - Electroplating AVX, Myrtle Beach, SC

Unit 19 - Miscellaneous Emissions From Electroplating Operations

	SBE					
Metal	Target Metal Cr Emission Factor Concentration <sup>2</sup> (Con.) (oz/gal) (gr/dscf)		Original Control Eff.	Other Metal Factor (Unc.) <sup>3</sup> (gr/dscf)		
Nickel Electroplating <sup>1</sup>	12.7	2.62E-06	98.0%	4.66E-05		
Lead Electroplating <sup>1</sup>	0.16	2.62E-06	98.0%	5.87E-07		
Gold Electroplating <sup>1</sup>	1.00	2.62E-06	98.0%	3.67E-06		
Tin Electroplating <sup>1</sup>	2.4	2.62E-06	98.0%	8.80E-06		

#### Notes:

- 1. Emission factors for all metals are calculated using AP-42, Section 12.20 (7/96).
- AVX removed their scrubber in 2002, therefore the emission rates are back calculated using the original control efficiency.
- 2. Target bath concentrations provided by AVX.
- 3. Other metal emission factor = 0.028\*Metal concentration (oz/gal)\*Cr Emission Factor.

Calc: [Target metal (oz/gal)  $\times$  0.28  $\times$  Cr E.F. (gr/dscf)] / (1 - 0.98) = Other Metal E.F. (gr/dscf)

#### Flow Rate Information:1

#### Parameter 95 liter SBE 95 & 130 liter SBEs Stack Diameter (ft) 0.5 0.5 5.44 18.43 Velocity (fps) 68 68 Temperature (F) 217.0 Flow Rate (acfm) 64.0 Flow Rate (scfm) 63.7 212.6

#### Note:

1. The SBE flow rates based on February 2, 2010 measurement by AVX.

#### **Electroplating Emissions**

	Emission Factor <sup>1</sup>	95 1 SI	$3E^2$	130 1	SBE <sup>2</sup>	Total Proces	s Emissions
Pollutant	(mg/dscm)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
PM	1.37E-01	9.78E-05	4.28E-04	2.18E-04	9.53E-04	3.15E-04	1.38E-03
Nickel	1.07E-01	7.64E-05	3.34E-04	1.70E-04	7.44E-04	2.46E-04	1.08E-03
Lead	1.34E-03	6.41E-07	2.81E-06	1.07E-06	4.69E-06	1.71E-06	7.50E-06
Gold	8.40E-03	2.00E-06	8.78E-06	-	-	2.00E-06	8.78E-06
Tin	2.02E-02	1.44E-05	6.32E-05	3.21E-05	1.41E-04	4.65E-05	2.04E-04

#### Notes:

#### SBE Line Information:

Lines	Size (liter)	Metals
SBE-1 and 5	95	Ni/Sn/Pb
SBE-4	95	Ni/Sn
SBE-2 and 3	130	Ni/Sn

<sup>1.</sup> Emission factor conversion from grains/dscf to mg/dscm from AP-42, Section 12.20. PM E.F. is the sum of all target metal E.F.s. Calc: Target metal E.F.  $(gr/dscf) \times 64.8/1 (mg/grain) \times 1/0.02832 (ft3/m3) = mg/dscm$ 

<sup>2.</sup> Emission calculated from emission factor times air flow rate multiplied by the number of respective line sizes.

#### UNIT 20

#### Thin Film Emissions AVX, Myrtle Beach, SC

#### Unit 20 - VOC Emissions from Thin Film Process

	Uncontrolled Emissions <sup>1</sup>		Controlled	Emissions <sup>2</sup>
Chemical	lb/hr	tpy	lb/hr	tpy
Acetic Acid	4.17E-02	1.83E-01	2.08E-02	9.13E-02
Tetramethylammonium hydroxide	5.21E-03	2.28E-02	2.60E-03	1.14E-02
2-ethanolamine	1.04E-01	4.54E-01	5.19E-02	2.27E-01
N-methylpyrolidone	2.03E-01	8.91E-01	1.02E-01	4.45E-01
1,2-Propenediol	6.71E-02	2.94E-01	3.35E-02	1.47E-01
2,4 Pentandione	1.00E-03	4.38E-03	5.00E-04	2.19E-03
Hexamethyldisilazane	1.67E-03	7.30E-03	8.33E-04	3.65E-03
Isopropyl alcohol	2.00E-02	8.76E-02	1.00E-02	4.38E-02
Mesitylene	2.83E-03	1.24E-02	2.83E-03	1.24E-02
Dipropylene glycol dimethyl ether	2.17E-03	9.49E-03	1.08E-03	4.75E-03
Naphtha	4.42E-03	1.93E-02	4.42E-03	1.93E-02
1-Methoxy-2-propanol acetate	1.60E-02	7.01E-02	8.00E-03	3.50E-02
1-Methoxy-2-propanol	2.38E-03	1.04E-02	1.19E-03	5.29E-03
Total VOCs	0.47	2.07	0.24	1.05

#### Notes:

- 1. Uncontrolled emissions are assumed to be a 10% loss from the daily material usage.
- 2. Controlled emission for VOC are based on a control efficiency of 50% based on conservative industry standards for soluble compounds. No control is assumed for mesitylene and naphtha since since they are insoluble.

#### Unit 20 - HAP/TAP Emissions from Thin Film Process

	Uncontroll	ed Emissions <sup>1</sup>	Con	$s^2$	
Chemical	lb/hr	tpy	lb/hr	tpy	lb/day
1-Methoxy-2-propanol	2.38E-03	1.04E-02	1.19E-03	5.29E-03	0.03
Dipropylene glycol dimethyl ether	2.17E-03	9.49E-03	1.08E-03	4.75E-03	0.03
Sulfuric Acid	0.07	0.32	7.21E-04	3.16E-03	0.02
Nitric Acid	0.39	1.70	3.88E-03	1.70E-02	0.09
2-ethanolamine	0.10	0.45	5.19E-02	2.27E-01	1.25
Hydrochloric Acid	0.09	0.40	9.18E-04	4.02E-03	0.02
Phosphoric Acid	0.16	0.70	1.59E-03	6.98E-03	0.04
Total HAP/TAPs	0.81	3.59	0.06	0.27	1.47

#### Notes:

- 1. Uncontrolled emissions are assumed to be a 10% loss from the daily material usage.
- 2. Conservative control efficiency of 99% based on system design for acids. 50% for soluble VOC 2-ethanolamine.

#### Unit 20 - Fluorine and Lead Emissions from Thin Film Process

	Uncontrolle	ed Emissions <sup>1</sup>	Controlled	Emissions <sup>2</sup>
Chemical	lb/hr	tpy	1b/hr	tpy
Hydrofluoric Acid	0.02	0.08	1.75E-04	7.67E-04
Lead	0.01	0.03	6.67E-05	2.92E-04
Lead zirconate titanate	0.01	0.03	6.04E-05	2.65E-04

#### Notes:

- 1. Uncontrolled emissions are assumed to be a 10% loss from the daily material usage.
- 2. Conservative control efficiency of 99% based on system design for hydrofluoric acids. Industry standard, conservative 99% efficiency for particulate matter.

#### UNIT 21

#### $\begin{array}{c} \mbox{Miscellaneous Support Emissions - APTC} \\ \mbox{AVX, Myrtle Beach, SC} \end{array}$

Unit 21 - APTC (Product Testing Process)

Material	HAP Constituents	нар/тар/voc	2006 Cleaning Solvent Use <sup>1</sup> (gal)	Potential Cleaning Solvent Use <sup>2</sup> (gal)	VOC Content (lb/gal)	HAP Content (lb/gal)	Amount Reclaimed <sup>3</sup> (%	VOC	HAP Emissions (tpy)
Iso Sprits	-	VOC	1,028	1182	6.23	0	93	0.26	-
Isopropyl Alcohol	-	VOC	343	394	6.51	0	93	0.09	-
BC-PM	-	VOC	2082	2394	7.57	0	93	0.63	-
Denatured Alcohol	MeOH, MIBK	HAP/TAP/VOC	0	0	6.59	0.21	93	0.00	0.00E+00
		TOTAL	3,453	3,971	•	•	•	0.98	0.00E+00

<sup>&</sup>lt;sup>1</sup>Per 2006 facility provided data.

 $<sup>^2</sup> Potential$  is estimated using the 2006 data plus 15%

<sup>&</sup>lt;sup>3</sup>Reclaim of cleaning solvent based on volume used and volume collected in waste bins.

#### UNIT 21

#### Miscellaneous Support Boiler Emissions AVX, Myrtle Beach, SC

#### Unit 21 - Emissions from Boilers (Miscellaneous Support)

#### **Boiler Information**

Fuel Combustion Unit:

Fuel Fired:

Natural Gas
Process Designation:

MB2 Boiler
Stack Designation:

NMFS-B1

Maximum Rated Capacity:16.738 MMBtu/hrAverage Fuel Heat Content:1,020 Btu/scfMaximum Annual Operation:8760 hours/yearHourly Fuel Usage:0.02 106 scf/hrPotential Annual Fuel Usage:175.2 106 scf/hr

#### Unit 21 - Criteria Pollutant Emissions

	<b>Emission Factors</b> <sup>1</sup>	Potential	to Emit
Pollutant	$(1b/10^6 scf)$	(lbs/hr)	(tpy)
PM, PM <sub>10</sub> , PM <sub>2.5</sub>	7.6	0.15	0.55
SOx	0.6	0.01	0.04
NOx	100	2.00	7.19
CO	84	1.68	6.04
VOC	5.5	0.11	0.40
Lead	0.0005	1.00E-05	3.59E-05

<sup>1</sup>Source: EPA AP-42, Section 1.4, Tables 1.4-1 and 1.4-2.

#### Unit 21 - HAP/TAP Emissions

	<b>Emission Factors</b> <sup>1</sup>	Potential to Emit	
Pollutant	$(lb/10^6 scf)$	(lbs/hr)	(tpy)
Benzene	2.10E-03	4.20E-05	1.51E-04
Formaldehyde	7.50E-02	1.50E-03	5.39E-03
Hexane	1.8	3.60E-02	1.29E-01
Naphthalene	6.10E <b>-</b> 04	1.22E-05	4.38E-05
Polycyclic Organic Matter	8.82E-05	1.76E-06	6.34E-06
Toluene	3.40E-03	6.80E-05	2.44E-04

<sup>1</sup>Source: EPA AP-42, Section 1.4, Table 1.4-3.

#### Unit 21 - GHG Emissions

	<b>Emission Factors</b> <sup>1</sup>	Potential to Emit	
Pollutant	$(1b/10^6 \text{ scf})$	(lbs/hr)	(tpy)
CO <sub>2</sub>	120000	2400	8625
$N_2O$	2.2	0.04	0.16
Methane	2.3	0.05	0.17

<sup>1</sup>Source: EPA AP-42, Section 1.4, Table 1.4-2.

#### UNIT 21

### Miscellaneous Support Emissions - New Stripper Tower AVX, Myrtle Beach, SC

Unit 21 - New Stripping Tower Emissions (Miscellaneous Support)

		НАР/ТАР	QED Model (6-tray)				
Contaminant	CAS No.		(lb/hr)	(lb/day)	(lb/yr)	(ton/yr)	
Till d. L. (TCT)	<b>5</b> 0.04.6		0.000	7.04	2624	4.00	
Trichloroethylene (TCE)	79-01-6	Н,Т	0.300	7.21	2631.6	1.32	
Vinyl chloride (chloroethylene)	75-01-4	Н,Т	0.090	2.16	789.5	0.39	
Ethylidine dichloride	75-34-3	Н,Т	0.110	2.64	963.6	0.48	
Total HAP/VOC			0.50	12.01	4384.73	2.19	

#### Notes:

- 1. Data source (TCE & vinyl chloride) Arcadis, July 2009
- 2. Data source (ethylidene dichloride) 2001 Title V application
- 3. The small stripping tower (#2) has been decommissioned.

#### UNIT 21

#### Miscellaneous Support Emissions - Soldering AVX, Myrtle Beach, SC

Unit 21 - Soldering Emissions (Miscellaneous Support)

Assumptions:

Number of machines (1 wave solder, 3 solder pots with hoods) Potential soldering usage

1,000 lbs/yr

HAPs	Manufacturers Product ID Number	Emission Factor	Potential Quantity Used		Potential Emissions
		(1b)	(lb/yr) <sup>1</sup>	(lb/yr)	(ton/yr)
Lead (Pb) <sup>3</sup>	SN/60 Electrolytic Grade Solder	0.000162	1150	0.19	9.32E-05
Cr (HAP)	SN/60 Electrolytic Grade Solder	0.000013	1150	0.01	7.48E-06
Mn (HAP)	SN/60 Electrolytic Grade Solder	0.000846	1150	0.97	4.86E-04

Criteria Pollutants	Manufacturers Product ID Number	<b>Emission Factor</b>	Potential Quantity Used		<b>Potential Emissions</b>
		(1b)	(lb/yr) <sup>1</sup>	(lb/yr)	(ton/yr)
PM	SN/60 Electrolytic Grade Solder	0.018	1150	20.70	0.010
PM-10	SN/60 Electrolytic Grade Solder	0.018	1150	20.70	0.010
PM-2.5	SN/60 Electrolytic Grade Solder	0.018	1150	20.70	0.010

<sup>&</sup>lt;sup>1</sup>Potential is estimated using the 2006 data plus 15%. 2006 was the most recent, maximum year data was available.

<sup>&</sup>lt;sup>2</sup>Per the MSDS, the emissions using the MSDS were more conservative for Pb there that number was used in the facility summary.

 $<sup>^3</sup> Using \ AP\text{-}42\ 12.19 \ Emission Factors for SMAW Welding Process$ 

#### **APPENDIX F**

Air Pollutant Dispersion Modeling Analysis

#### **Modeling Report**

Toxic Air Pollutant and Criteria Refined Air Dispersion Modeling Report

AVX Corporation

Myrtle Beach, South Carolina

May 2011

RESOLUTE ENVIRONMENTAL LLC

#### **REPORT**

#### Refined Air Dispersion Modeling Report

# AVX Corporation Myrtle Beach, South Carolina

Gary Yoder Resolute Environmental, LLC

May 2011

RESOLUTE

**ENVIRONMENTAL LLC** 

#### TABLE OF CONTENTS

$\mathbf{E}$	xecutive S	Summary	. 1
1.	Introdu	ction	. 2
		ound	
		Site Location and Description	
	2.2	Emissions	. 2
3.	Modelir	ng Methodology	. 4
	3.1.	Model Selection and Use	
	3.2.	Surrounding Terrain	. 4
	3.3.	Urban/Rural Classification	. 4
	3.4.	Good Engineering Practice Stack Height Analysis	. 4
	3.5.	Meteorological Data	. 5
	3.6.	Receptor Locations	. 5
	3.7.	Cavity Impacts	. 5
	3.8.	Coordinate System	. 5
4.	Modelir	ng Results	
		ces	

#### **List of Tables**

- 1 Summary of Modeled Emission Rates
- 2 Summary of Stack Parameters Point Sources
- 3 Summary of Stack Parameters Volume Sources
- 4 Summary of AERMOD Model Options

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- 5 Summary of SC DHEC Specified Receptors
- 6 Summary of AERMOD Modeling Results Standard No. 8

#### **List of Figures**

- 1 Site Location Map
- 2 Facility Plot Plan

#### **Executive Summary**

AVX Corporation (AVX) operates a ceramic capacitor manufacturing facility in Myrtle Beach, South Carolina. This refined air dispersion modeling analysis accompanies the facility's March 2011 federal Title V operating permit renewal application. Air dispersion modeling was used to estimate ambient concentrations from facility process emissions of regulated toxic air pollutants (TAP). This analysis uses the U.S. EPA AERMOD dispersion modeling system to determine receptor grid concentrations and at discrete sensitive receptors. Potential emission rates were modeled and all estimated concentrations were well below the South Carolina Air Pollution Control Regulation 62.5, Standard No. 8 Maximum Allowable Ambient Concentrations and Standard No. 2 National Ambient Air Quality Standards.

#### 1. Introduction

AVX Corporation (AVX) operates a ceramic capacitor manufacturing facility in Myrtle Beach, South Carolina. The facility is renewing their federal Tile V operating permit, and therefore submitting a comprehensive, refined air dispersion modeling analysis for emissions of regulated compounds.

This report documents the technical approach for conducting a refined air dispersion modeling analysis using the USEPA's AERMOD modeling system. The analysis follows the modeling methodologies contained in the South Carolina Department of Health and Environmental Control July 2001 *Air Quality Modeling Guidelines* and provides a summary of the dispersion model input variables and modeling output.

#### 2. Background

#### 2.1. Site Location and Description

The location of the AVX site is shown in Figure 1. The site is located west of 17<sup>th</sup> Ave South, east of the Myrtle Beach International Airport and within the City of Myrtle Beach, South Carolina. The facility site plan, including building heights and stack locations, is shown in Figures 2 and 3. The facility is comprised of many buildings for administration, process support, and manufacturing of ceramic capacitors and resistors. The source parameters for the emission sources that are to be included in the modeling analysis are summarized in Tables 2 and 3. All of the sources in this analysis, except for fugitive sources, will be modeled as point sources (Table 2). Fugitive emission sources were modeled as a volume point source (Table 3).

#### 2.2 Emissions

Tables 1 is a summary of emission rate modeling input for this analysis. AVX's criteria and TAP emissions result from:

- 1. Cleaning solutions used in the CMAP, Slip, and Metallization departments
- 2. Constituents of solvents used to manufacture electronic ink and ceramic slip
- 3. Dry dicing in the Metallization department,
- 4. Electroplating,
- 5. Remediation stripping tower, and

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- 6. Fuel combustion
- 7. Soldering, and
- 8. Dry material handling.

Details on the emission rate calculations can be found in the 2011 Title V renewal application. As indicated in Table 1, emissions of criteria pollutants are below modeling exemption levels.

#### Cleaning

Typical of the electronics industry, denatured ethyl alcohol (DEA) and 100% xylene are used to clean process components. DEA contains small amounts of methanol and MIBK and is used in the slip, termination, and chip build-up processes. Xylene is used for cleaning in the CMAP and in Metallization departments, however, the use of this solvent for cleaning is being phased out.

In Metallization, equipment used to terminate capacitor chips is currently located in the MB1 Main building. Small amounts of methanol and methyl isobutyl ketone emissions result from cleaning this equipment. AVX may move Termination into MB2, sometimes referred to New Manufacturing Facility (NMF). The timing of this move (or if it will even occur) is unclear at this time. The process of moving the equipment requires a lengthy qualification process before the equipment can be relocated. For future permitting flexibility, this modeling analysis simulates both current and future emissions from Termination cleaning, should the equipment be relocated. These emissions are modeled as a volume source at both MB1 (model I.D. MFGMB1) and MB2 (model I.D. MFGNEW).

#### **Process**

Process emissions of organic TAPs and particulate matter result from solvent usage, dry dicing, and dry material handling. The RMM department prepares ceramic materials prior to entering the Slip Department. Some particulate matter emissions result, but are controlled by three fabric filters. Dry dicing is the removal of chips from plates following the build-up process. Most dicing occurs in a wet environment, however, a smaller percentage are removed dry resulting in some particulate matter emissions. Dry dicing is also controlled by a fabric filter.

#### **Plating**

Nickel and lead are emitted from the SBE and Autoline plating operations. Although AVX is consolidating manufacturing (formerly known as MB2) into the new manufacturing building, plating will remain in its present location. This relocation includes the back-end support processes such as plating. The Autoline plating process will soon be decommissioned and not included in the move. In the near future, all plating will be completed using the SBE (active) or FCT (passive) processes. All plating emissions were modeled from their current location in MB1.

#### Miscellaneous Support - Remediation

AVX operates a groundwater remediation system, located near the Slip Manufacturing building. This is a new (like-for-like) replacement of an older stripping system. Arcadis designed the system and provided the emission rates for multiple organic TAP compounds potentially emitted from the groundwater. It should be noted that a smaller stripping system near MB1 has been decommissioned.

#### Miscellaneous Support - Soldering

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AVX utilizes small soldering pots and a wave solder machine for product QA/QC. Although most solder pots do not have exhausts, a few solder pots and the wave solder machine do have exhausts primarily to evacuate solder flux. A small amount of lead emissions may be emitted from the facility from these units. These stations will also be consolidated to the new manufacturing building. However, similar to the SBE plating stacks, their locations and heights are not currently known. Therefore, all soldering emissions were assumed emitted and modeled from a conservative stack

location on the building closest point to the property boundary (SE corner). A height of only 15 feet was modeled.

### 3. Modeling Methodology

A refined level modeling analysis was performed in accordance with SC DHEC modeling guidance, as specified in the *Air Quality Modeling Guidelines*, and the United States Environmental Protection Agency (USEPA) *Guidelines on Air Quality Models* (USEPA, 2005).

### 3.1. Model Selection and Use

The current version of the AERMOD (Version 09292) dispersion model was used to predict maximum concentrations. The AERMOD model was selected primarily for the following reasons:

- USEPA and SC DHEC have approved the general use of the model for air quality dispersion analysis as a result of the model assumptions and methods being consistent with those referenced in the Guideline on Air Quality Models.
- The AERMOD model is capable of predicting the impacts from point (stack) and volume sources in rural areas that comprise simple terrain.
- The AERMOD model can predict 24-hr averaging period impacts at each receptor.
- The AERMOD model has several options and features that enable it to be adapted to a wide range of specific applications. A complete listing of model option "switches" to be used for this exercise is included as Table 4.

### **3.2.** Surrounding Terrain

Terrain surrounding the facility is categorized as simple terrain; however, there is terrain above stack base. Therefore, AERMOD was run with the receptor specific elevations, i.e., the non-default FLAT option was not utilized.

### 3.3. Urban/Rural Classification

A land use review was performed to evaluate whether rural or urban dispersion parameters should be used in the analysis. This procedure involved evaluating the presence of various industrial, commercial, residential and agricultural/natural areas within a three-kilometer radius centered on the proposed site (Auer Scheme). If more than fifty percent of the area within this circle were designated industrial, commercial and compact residential, urban dispersion parameters would be used; otherwise, the modeling would use rural dispersion parameters.

A review of the topographic map and aerial photos of the area surrounding the site revealed that the area within three kilometers of the site is predominately rural. Thus, based on this analysis, rural dispersion curves will be used in the AERMOD model.

### 3.4. Good Engineering Practice Stack Height Analysis

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The USEPA provides specific guidance for calculating Good Engineering Practice (GEP) stack height and for evaluating whether building downwash will occur (USEPA, 1985). GEP stack height is defined as the height of the structure plus 1.5 times the lesser of the structure height or projected width. If the stack height for a source is less than the height identified using GEP guidelines, based on

the dimensions of nearby buildings, then the potential for building downwash to occur exists and is to be considered in the modeling analysis.

Since all of the stacks in this analysis are less than GEP, BPIP-PRIME was used to obtain the building dimensions required for AERMOD to calculate downwash. Figure 2 depicts the structures that were included in the BPIP analysis.

It should be noted that the PDG building (SEBUILDING in previous modeling) has been decommissioned. The original Tower #2 stripping tower was located next to the PDG building. With the building decommissioning, the stripping tower has been moved slightly west next to the Slip building.

### 3.5. Meteorological Data

The air quality modeling analysis used National Weather Service (NWS) surface meteorological data from Wilmington, North Carolina and concurrent twice-daily upper air soundings from Charleston, South Carolina for the years 2002-2006. The AERMET processed hourly meteorological data files for each year of record to be used in the analysis were obtained from the SC DHEC website.

### 3.6. Receptor Locations

A Cartesian grid of receptors was used with a spacing of 100 meters extending to a distance of 1.5 kilometers from the property line. Property line receptors were placed at a spacing of 50 meters. In addition, discrete receptors were placed as locations specified by SC DHEC (See Table 5).

Each receptor was processed through AERMAP (Version 09040), the terrain preprocessor for the AERMOD model. Thirty meter resolution Digital Elevation Models (DEMs) from the USGS were utilized in AERMAP for this analysis.

### 3.7. Cavity Impacts

Because the stack heights are less than GEP, the potential for impacts in near-building cavity regions must be evaluated. Since the AERMOD model calculates impacts within the cavity, an additional cavity analysis was not performed.

### 3.8. Coordinate System

The locations for the buildings, stacks, receptors and DEMs for this analysis are in the UTM coordinate system, zone 17, NAD27.

### 4. Modeling Results

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Table 6 summarizes the results of the modeling for each TAP compound identified in the AVX processes. Predicted maximum concentrations are well below all applicable MAACs.

Electronic copies of the BEEST, AERMOD, BPIP-PRIME and DEM files are on the enclosed CD.

### 5. References

- Auer, A.H. 1978. Correlation of Land Use and Cover with Meteorological Anomalies. Journal of Applied Meteorology, 17:636-643.
- SC DHEC, 2001. South Carolina Department of Health & Environmental Control, *Air Quality Modeling Guidelines*, Columbia, SC.
- USEPA, 1985. Guideline for Determination of Good Engineering Practice Stack Height (Technical Support Document of the Stack Height Regulations) (Revised). U.S. Environmental Protection Agency. EPA-450/4-80/023R. Washington, DC: USEPA.
- USEPA, 2004. *User's Guide for the AMS/EPA Regulatory Model AERMOD*. EPA-454-B-03-001. Research Triangle Park, NC: EPA, Office of Air Quality Planning and Standards.
- USEPA, 2005. Guideline on Air Quality Models, Appendix W to 40 CFR Part 51.

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# **TABLES**

Table 1

### AVX Corporation Myrtle Beach, South Carolina

### Standards No. 8 and No. 2 Modeled Emission Rates

Department	Emission Unit ID	Model ID	Constituent	CAS	Material/Process	Potential (lb/yr)	Emissions <sup>A</sup> (lb/hr)	Modeling Exemption Levels (lb/hr)	Modeling Required?
RMM	14	RMM	PM/PM-10/PM-2.5	N/A	Grinding, mixing, milling, prilling	0.08	8.9E-06	1.0	No
Slip Mfg.	15	SLIP	Methanol	67-56-1	Denatured alcohol - Cleaning	15.40	1.76E-03		
- · · · · · · · · · · · · · · · · · · ·	15	SLIP	MIBK	108-10-1	Denatured alcohol - Cleaning	8.12	9.27E-04		
	15	SLIP	Bis (2-ethylehexyl) phthalate	117-81-7	DiOctylPhthalate process solvent	260.0	0.03		
	16	SLIP	Xylene	1330-20-7	Slip Solvent	46.2	0.01		
Metals Mfg.	16	MD(1, 2 & 3)C-1	РМ	N/A	Mixing and milling	2340.00	0.27	1.0	No
	16	MD(1, 2 & 3)C-1	PM-10/PM-2.5	N/A	Mixing and milling	1540.00	0.18	1.0	No
	16	MD(1, 2 & 3)C-1	Xylene	1330-20-7	Electrode Ink Solvent	100.00	0.01		
	16	MD(1, 2 & 3)C-1	Toluene	108-88-3	Mineral Spirits Type 66	1.15	1.32E-04		
	16	MD(1, 2 & 3)C-1	Bis (2-ethylehexyl) phthalate	117-81-7	DiOctylPhthalate process solvent	9.76	1.11E-03		
	16	MD(1, 2 & 3)C-1	Ethylbenzene	100-41-4	Mineral Spirits Type 66	0.58	6.58E-05		
	16	MD(1, 2 & 3)C-1	Methanol	67-56-1	Denatured alcohol - Cleaning	2.84	3.24E-04		
	16	MD(1, 2 & 3)C-1	MIBK	108-10-1	Denatured alcohol - Cleaning	1.50	1.71E-04		
Manufacturing	17	NMFS-F1 & NMFS-F2	Methanol	67-56-1	Slip/Ink Solvent	123.6	0.02		
(CMAP, CMAP Cleaning &	17	NMFS-F1 & NMFS-F2	MIBK	108-10-1	Slip/Ink Solvent	44.2	0.01		
Metallization Cleaning)	17	NMFS-F1 & NMFS-F2	Bis (2-ethylehexyl) phthalate	117-81-7	DiOctylPhthalate process solvent	17.2	2.94E-03		
	17	NMFS-F1 & NMFS-F2	Ethylbenzene	100-41-4	Mineral Spirits Type 66	17.2	2.94E-03		
	17	NMFS-F1 & NMFS-F2	Toluene	108-88-3	Mineral Spirits Type 66	17.2	2.94E-03		
	17	NMFS-F1 & NMFS-F2	Xylene	1330-20-7	Mineral Spirits Type 66 Solvent	17.2	2.94E-03		
	17	CMAPFUG	Methanol	67-56-1	Slip/Ink Solvent - Fugitive	250.0	0.04		
	17	CMAPFUG	MIBK	108-10-1	Slip/Ink Solvent - Fugitive	131.6	0.02		
	17	CMAPFUG	Bis (2-ethylehexyl) phthalate	117-81-7	DiOctylPhthalate process solvent - Fugitive	28.8	3.29E-03		
	17	CMAPFUG	Ethylbenzene	100-41-4	Mineral Spirits Type 66 - Fugitive	28.8	3.29E-03		
	17	CMAPFUG	Toluene	108-88-3	Mineral Spirits Type 66 - Fugitive	28.8	3.29E-03		
	17	CMAPFUG	Xylene	1330-20-7	Mineral Spirits Type 66 Solvent - Fugitive	28.8	3.29E-03		
	17	NMFS-F1	PM/PM-10/PM-2.5	N/A	Termal Oxidizer Gas Combustion	60.0	0.01	1.0	No
	17	NMFS-F1	SO <sub>2</sub>	N/A	Termal Oxidizer Gas Combustion	6.0	6.85E-04	1.0	No
	17	NMFS-F1	NOx	N/A	Termal Oxidizer Gas Combustion	880.0	0.10	1.0	No
	17	NMFS-F1	CO	N/A	Termal Oxidizer Gas Combustion	740.0	0.08	10.0	No
	19 19	MFGMB1 & MFGNEW MFGMB1 & MFGNEW	Methanol MIBK	67-56-1 108-10-1	Denatured alcohol Denatured alcohol	147.8 78.0	0.02 0.01		
CMAP Support	18	NMFS-S1	PM/PM-10/PM-2.5	N/A	Dry dicing	380	0.04	1.0	No
Metallization	19	7C-2A & 7C-2B	PM/PM-10/PM-2.5	N/A	Electroplating - Autoline & SBE	2.76	3.15E-04	1.0	No
IVICIAIIZALIOTI	19	7C-2A & 7C-2B	Lead	N/A	Electroplating - Autoline & SBE	0.01	1.70E-06	See be	
	19	7C-2A & 7C-2B	Nickel	N/A	Electroplating - Autoline & SBE	2.16	2.47E-04	See De	iow
This File December	00	NIMEO TEO	DM/DM 40/DM 0.5	N/A	P	00.00	0.04	4.0	N.
Thin Film Process	20 20	NMFS-TFS NMFS-TFS	PM/PM-10/PM-2.5 Lead	N/A N/A	Process Process	60.00 0.58	0.01 6.67E-05	1.0 See be	No
	20	NMFS-TFS	Sulfuric acid	7664-93-9	Process	6.32	7.21E-04	See De	HOW
	20	NMFS-TFS	Nitric acid	7697-37-2	Process	34.00	3.88E-03		
	20	NMFS-TFS	2-ethanolamine	141-43-5	Process	454.00	0.05		
	20	NMFS-TFS	Hydrochloric acid	7647-01-0	Process	8.04	9.18E-04		
	20	NMFS-TFS	Phosphoric acid	7664-38-2	Process	14.0	1.59E-03		
Miscellaneous Support	21	SOLDER1	PM/PM-10/PM-2.5	N/A	Soldering	20	2.28E-03	1.0	No
оонапооиз опрроп	21	NMFS-B1	PM/PM-10/PM-2.5	N/A	Boiler	1100	0.13	1.0	No
	21	NMFS-B1	SO <sub>2</sub>	N/A	Boiler	80	0.01	1.0	No
	21	NMFS-B1	NOx	N/A	Boiler	14380	1.64	1.0	No
	21	NMFS-B1	CO	N/A	Boiler	12080	1.38	10.0	No
	21	NMFS-B1	Lead	N/A	Boiler	7.E-02	8.20E-06	See be	
	21	SOLDER1	Lead	N/A	Soldering	0.1864	2.13E-05	See be	
	21	TOWER	1,1,1-trichloroethane	71-55-6	Stripping tower	2631.6	0.30		
	21	TOWER	1,1-dichloroethane	75-34-3	Stripping tower	963.6	0.11		
	21	NMFS-B1	Benzene	71-43-2	Boiler	0.3	3.45E-05		
	21	SOLDER1	Chriomium (assumed +6)	N/A	Soldering	1.5E-02	1.71E-06		
	21	NMFS-B1	Formaldehyde	50-00-0	Boiler	10.8	1.23E-03		
	21	NMFS-B1	Hexane	110-54-3	Boiler	258.0	0.03		
	21	SOLDER1	Manganese	N/A	Soldering	0.97	1.11E-04		
	21	NMFS-B1	Naphthalene	91-20-3	Boiler	0.1	1.00E-05		
	21	NMFS-B1	Toluene	108-88-3	Boiler	0.5	5.57E-05		
	21	TOWER	Vinyl chloride	75-01-4	Stripping tower	789.5	0.09		

Notes

A. Refer to the May 2011 Title V renewal application for emission rate calculations.

Table 2

AVX Corporation

Myrtle Beach, South Carolina

### **Summary of Stack Parameters - Point Sources**

Source	Description	Stack ID	UTM Easting (m) <sup>A</sup>	UTM Northing (m) <sup>A</sup>	Base Elevation (ft)	Stack Height (ft)	Temperature (F)	Velocity (fps)	Diameter (ft)
Metals Mfg.	Metals Mill & Mixing	MD1C-1	693700	3728106	23	37	70	57.0	1.67
	Metals Mill	MD2C-1	693716	3728101	23	22	70	NA <sup>B</sup>	0.67
	Metals Mill	MD3C-1	693720	3728101	23	25	70	26.5	1.00
CMAP	Chip Mfg - T.O.	MB2-F1	693341	3727899	23	30	90	64	2.5
	Chip Mfg - Adsorber	MB2-F2	693344	3727899	23	28	1030	6.8	2
Metallization	Autoline Plater & SBE	7C-2A	693773	3728208	23	32	70	1.0	3.43
	Autoline Plater & SBE	7C-2B	693773	3728206	23	32	70	1.0	3.43
Thin Film Process	Thin Film Process	MB2-TFS	693300	3727880	23	35	70	54.0	2.50
Miscellaneous Sup.	Soldering	Solder1 <sup>C</sup>	693305	3727844	23	15	70	0.03	0.25
	Boiler	MB2-B1	693322	3727939	23	35.5	600	15.3	0.83
	Stripping Tower	TOWER	693890	3728065	23	20	70	NA <sup>B</sup>	2.25

#### Notes:

A. UTM, Zone 17, NAD27.

B. MB2-F2, NMFS-S1, and the stripping Tower have rain caps, so the velocity was set at 0.01 m/s, per the SC DHEC Air Quality Modeling Guidelines.

C. The new soldering stack IDs and locations have yet to be determined. For conservatism, a stack was located at the nearest point to property boundary on builing with a 15 foot height with no exit velocity assumed.

Table 3

# AVX Corporation Myrtle Beach, South Carolina

### **Summary of Stack Parameters - Volume Sources**

Source	Description	Stack ID	UTM Easting (m) <sup>A</sup>	UTM Northing (m) <sup>A</sup>	Base Elevation (ft)	Release Height (ft)	Horizontal Dimension (ft)	Vertical Dimension (ft)
Slip Manufacturing	Ceramic Slip	SLIP	693869	3728057	23	15.0	38.1	14.7
Manufacturing	Department cleaning <sup>B</sup>	MFGNEW	693344	3727899	23	12.0	53.5	11.3
		MFGMB1	693796	3728250	23	8.0	46.6	7.5
		CMAPFUG	693341	3727893.2	23	12.0	53.5	11.3

### Notes:

A. UTM, Zone 17, NAD27.

B. Cleaning emissions occur at only one location. For futre permitting flexibility in the event of equipment relocation, the emissions are modeled at the existing (MFGMB1) and potental future (MFGNEW) locations.

## Table 4

# AVX Corporation Myrtle Beach, South Carolina

## **Summary of AERMOD Model Options**

Option	Selected Parameter						
Calculations	Refined Analysis, 24-hr Averages						
Receptor Orientation	Cartesian - 100 meter Spacing to 1.5 km Downwind						
Dispersion Coefficients	Rural						
Stack Tip Downwash	Yes, as Appropriate						
Building Downwash Effect	Yes						
Direction Dependant Building Dimensions	Yes						
Meteorology	2002-2006 Unkown Surface 2002-2006 Charleston, South Carolina (Upper-Air)						
Calm Hours	Omitted from Calculations (Regulatory Default)						

### Table 5

# AVX Corporation Myrtle Beach, South Carolina

## **Summary of SC DHEC Specified Receptors**

Location <sup>A</sup>	UTM Easting (m) <sup>B</sup>	UTM Northing (m) <sup>B</sup>			
Pinner Place	602012	2720010			
	693913	3729018			
610 13 <sup>th</sup> Avenue South	694402	3728316			
1036 Pinnacle Lane	693635	3729141			
1210E Benna Drive	694108	3728608			
717 11 <sup>th</sup> Avenue South	694427	3728514			

#### Notes

A. All locations are in Myrtle Beach, South Carolina.

B. UTM, Zone 17, NAD27.

Table 6

AVX Corporation

Myrtle Beach, South Carolina

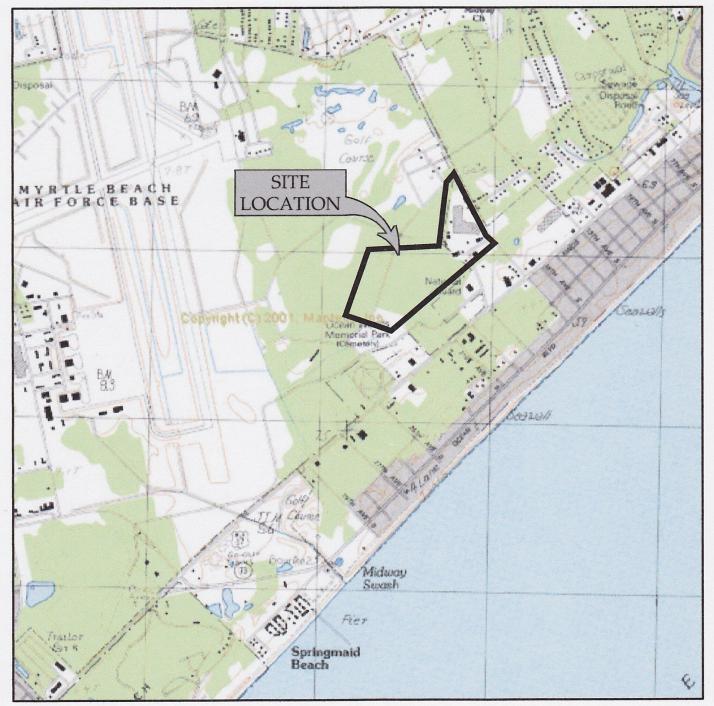
## **Summary of AERMOD Modeling Results - Standard No. 8**

Contaminant	CAS Number	Predicted Maximum Ambient Concentration (ug/m³)	MAAC <sup>A</sup> (ug/m³)	Percent of MAAC (%)
1,1,1-Trichloroethane	71-55-6	88.8	9550	<1
2-Ethanolamine	141-43-5	0.46	200	<1
Benzene	71-43-2	0.00052	150	<1
Bis (2-ethylehexyl) phthalate	117-81-7	6.42	25	26
Chriomium (assumed +6)	Chrome	0.00006	2.5	<1
Ethyl Benzene	100-41-4	0.264	4,350	<1
Formaldehyde	50-00-0	0.019	15	<1
Hexane	110-54-3	0.46	900	<1
Hydrochloric acid	7647-01-0	0.008	175	<1
Manganese	Mang	0.004	25	<1
Methanol	67-56-1	3.47	1,310	<1
Methyl Isobutyl Ketone	108-10-1	1.82	2,050	<1
Naphthalene	91-20-3	0.0002	1,250	<1
Nickel	7440-02-0	0.02	0.500	4
Nitric Acid	7697-37-2	0.034	125	<1
Phosphoric Acid	7664-38-2	0.014	25	<1
Sulfuric Acid	7664-93-9	0.006	10	<1
Toluene	108-88-3	0.264	2,000	<1
Vinylidene Chloride	75-01-4	26.72	99.0	27
Xylene	1330-20-7	1.82	4,350	<1

Notes:

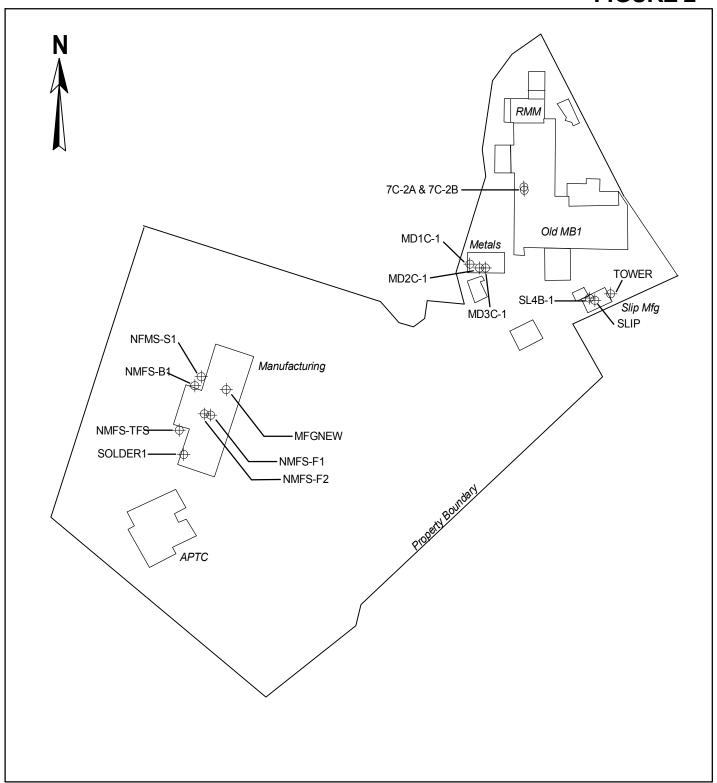
A. Based on a 24-hour averaging period.

# **FIGURES**





# FIGURE 2



AVX CORPORATION MYRTLE BEACH, SC

**FACILITY PLOT PLAN** 

# **APPENDIX G**

**Compliance Assurance Monitoring Plan** 

# **Compliance Assurance Monitoring Plan**

Control by Adosrber/Desorber and Thermal Oxidizer for VOC Emissions from 24 CMAP Machines

**AVX Corporation Myrtle Beach, South Carolina** 



**March 2011** 

RESOLUTE ENVIRONMENTAL LLC

# **Compliance Assurance Monitoring Plan**

# VOC Control by Adsorber/Desorber and Thermal Oxidizer for 24 CMAP Build Up Machines

# **AVX Corporation Myrtle Beach, South Carolina**

Air Permit No. TV-1340-0002

Prepared For:

## **AVX Corporation**

801 17<sup>th</sup> Avenue South Myrtle Beach, South Carolina 29578

Prepared By:

Resolute Environmental, LLC

114 Oak Fern Lane Willow Spring, North Carolina 27592

**March 2011** 

# **Table of Contents**

Section	<u>Page</u>
I. Introduction	1
II. CAM Rule	1
III. Affected Units	2
IV. CAM Plan - Adsorber/Desorber/TO VOC Control	4
1. Background	4
2. Process Design	4
3. Applicable Emission Limits and Standards	4
4. Rationale for Selection of Performance Indicators	5
5. Rationale for Indicator Ranges	6
6. Performance Criteria	6
7. Performance Test Data	7
8. Implementation Plan	7
<u>Table</u>	
Table 1 CAM Plan Summary - VOC Control	8

### 1. Introduction

The AVX Corporation (AVX) owns and operates an electronic capacitor manufacturing facility in Myrtle Beach, South Carolina. Operations at AVX include Raw Materials Manufacturing (RMM), Slip Manufacturing, Metals Department, CMAP Buildup, CMAP Support, Kiln Room, Metallization Department and other supporting processes.

AVX currently operates all emission sources under Title V Permit No. TV-1340-0002 issued by the South Carolina Department of Health and Environmental Control (DHEC) and is in the process of renewing this operating permit. Under USEPA regulations promulgated at 40 CFR 64, a facility must submit a Compliance Assurance Monitoring Plan (CAM Plan) for all affected sources at the time of renewal of its initial Title V permit. The regulations under 40 CFR 64 are commonly referred to as the CAM Rule. This CAM Plan is being submitted in compliance with the requirements specified in 40 CFR 64.

### II. CAM Rule

The CAM rule applies to pollutant specific emission units (PSEU) located at a major source that meet all of the following criteria:

- a. The PSEU is subject to an emission limit or standard, and
- b. The PSEU uses a control device to achieve compliance, and
- c. Potential pre-control emissions from the PSEU are equal to or exceed 100% of the major source threshold.

The major source thresholds are 100 tons/yr of criteria pollutants (including PM and SO<sub>2</sub>), 25 tons/yr of total hazardous air pollutants (HAPs), and 10 tons/yr of a single HAP.

1

The CAM rule requires facilities to design and implement CAM Plans for affected PSEU to assure that control devises are maintained and operated at levels that will result in compliance with the emission limits. Owners are required to:

- select representative parameters upon which compliance can be assured,
- establish indicator ranges (or procedures for setting indicator ranges) for the parameters,
- use performance testing or other information to verify the parameters and ranges, and
- correct control device performance problems as expeditiously as practicable.

### The CAM Plan must:

- a. Describe the indicators to be monitored and how they are to be measured;
- b. Describe the indicator ranges or the process by which the indicators are to be established;
- c. Describe the performance criteria for the monitoring approach, including
  - specifications for obtaining representative data
  - quality assurance and control procedures
  - monitoring frequency
  - data collection procedures
  - data averaging period;
- d. Provide a justification for the proposed elements of the monitoring;
- e. Provide historical monitoring data, emissions test data and control device operating data recorded during performance tests, if necessary;

Provide an implementation plan, if monitoring requires installation, testing, or other activities prior to installation.

### **III. Affected Units**

The CMAP build up process is the only source at AVX with potential CAM Rule applicability. It has an uncontrolled, potential volatile organic compound (VOC) emission rate of 116 ton/yr, which is greater than the major source threshold and uses three adsorber/desorbers and thermal oxidizer abatement system to control VOC emissions. The current Title V permit limits VOC emissions from the building that includes CMAP build up to 39.5 ton/yr to avoid Prevention of Significant Deterioration applicability (S.C. Regulation 61-62.5, Section H – Synthetic Minor Plant

Permits). With significant operational and emission reduction changes at AVX, removal of this emission limitation has been requested in the Title V renewal application. The only other emission limitation applicable to CMAP build up equipment is S.C. Regulation 61-62.5, Standard 4, Section IX requiring 20% or less opacity. S.C. 61-62.5, Standard 3, Section III (Waste Combustion and Reduction) limits the thermal oxidizer particulate matter emissions to 0.5 lb/MMBtu and opacity to 20%, except during periods of startup and shut down (Item I, Industrial Incinerators). Operating the source and control equipment consistent with good air pollution control practices will result in meeting the requirements of Standard 3. To summarize, with removal of 39.5 ton/yr VOC emission limit, CAM Rule applicability items a. and b. above do not apply to CMAP build up, and therefore a CAM Plan is not required. However, with AVX's continued commitment to reducing environmental impacts, the VOC abatement system will continue to be operated by AVX. This Plan is submitted as part of that commitment to demonstrate that the adsorber/desorbers and thermal oxidizer will be operated in accordance with the parametric monitoring requirements of the operating permit.

## IV. COMPLIANCE ASSURANCE MONITORING PLAN CMAP BUILD UP VOC EMISISONS CONTROLLED BY AN ADORBER/DESORBER AND THERMAL OXIDIZER

### 1. Background

CMAP machines are tools used by AVX to manufacture capacitor chips of varying sizes using ceramic and electrode ink raw materials. The raw materials emit VOCs which are captured by 24 CMAP machines that deliver the compounds to the emission abatement system. The control system includes three adsorber/desorbers that are connected in parallel to concentrate the organics in the air stream, which is delivered to a 1 MMBtu/hr thermal oxidizer (TO-1) for destruction. A set of eight (8) CMAP machines are connected to one 5,000 cfm adsorber/desorber (AD-1). Another set of 4 CMAP machines are connected to a separate 5,000 cfm adsorber/desorber (AD-2) and 12 machines are connected to a 14,000 cfm adsorber/desorber (AD-3).

### 2. Process Design

Process air from the CMAP machines enters the bottom of the adsorber and is directed upward through a series of sieve trays fluidizing beaded activated carbon (BAC) on the trays. The countercurrent contact of process gas and carbon removes solvent vapors from the air stream. Spent carbon from the last tray collects in the adsorption bottom before it is pneumatically transported to the top of the desorber. The BAC flows down through the desorber as a moving bed. It passes through a ceramic heated zone in which the concentrated solvent is desorbed from the BAC. The highly concentrated VOC stream is then delivered to the thermal oxidizer to be burned.

### 3. Applicable Emission Limits and Standards

The CMAP build up process is the only source at AVX with potential CAM Rule applicability. It has an uncontrolled, potential volatile organic compound (VOC) emission rate of 116 ton/yr, which is greater than the major source threshold and uses three adsorber/desorbers and thermal oxidizer abatement system to control VOC emissions. The current Title V permit limits VOC emissions from the building that includes CMAP build up to 39.5 ton/yr to avoid Prevention of Significant Deterioration applicability (S.C. Regulation 61-62.5, Section H – Synthetic Minor Plant Permits). With significant operational and emission reduction changes at AVX, removal of this

emission limitation has been requested in the Title V renewal application. With removal of 39.5 ton/yr VOC emission limit, the CAM Rule does not apply because the air pollution control system will not be used to meet an applicable standard. However, with AVX's continued commitment to reducing environmental impacts, the VOC abatement system will continue to be operated by AVX. This Plan is submitted as part of that commitment to demonstrate that the adsorber/desorbers and thermal oxidizer will be operated in accordance with the parametric monitoring requirements of the operating permit.

### 4. Rationale for Selection of Performance Indicator

S.C. Regulation 61-62.5, Standard 3, Section III, Item I is applicable to the thermal oxidizer and limits emissions from the unit to 20% opacity (except during periods of start up and shutdown) and particulate matter emissions to 0.5 lb/MMBtu. Similarly, S.C. Regulation 61-62.5, Standard 4, Section IX limits the CMAP build up equipment to 20% opacity. Each of these limitations are based on the control of particulate matter emissions. Since CMAP build up emits little to no particulate matter, and the thermal oxidizer burns concentrated VOCs or natural gas, it is highly improbable that any violation of the applicable Rules limiting particulate matter and opacity would occur. Further, the uncontrolled particulate matter emission rate associated with firing natural gas would be well below the 100 ton/yr major source CAM Rule applicability threshold.

As indicated previously, the removal of the 39.5 ton/yr VOC limit from the CMAP production building eliminates the requirement of a CAM Plan for the CMAP build up air pollution abatement system building because the system will no longer be used to meet an emission limit. However, AVX will continue to operate the unit as required by the operating permit and use the CAM Rule as guidance for operation. In 40 CFR 64.4, the CAM Rule establishes the concept of presumptively acceptable monitoring approaches. This concept presumes that existing monitoring requirements specified by USEPA or permitting authorities for specific emission sources establishes acceptable monitoring approaches for other similar sources. Based on the system design, the AVX operating permit requires monitoring pressure drop across the adsorbers, temperature in the desorbers, and temperature in the thermal oxidizer to demonstrate effective VOC destruction.

### 5. Rationale for Selection of Indicator Ranges

On February 26, 2009, AVX conducted a performance test on the CMAP build up abatement system at the request of the South Carolina Department of Health and Environmental Quality. The potential VOC emission rate from eleven CMAP machines was simulated to challenge one adsorber/desorber and the thermal oxidizer. The operating permit requires that AVX monitor the following parameters and ranges:

Required Parameter	Required Range
Adsorption pressure drop	2.0 - 5.0" H <sub>2</sub> O
Desorption temperature	350 – 500 deg F
Thermal oxidizer temperature	1400 – 1800 deg F

During the source test, the average pressure drop was 3.2" water, average desorption temperature was 420° F, and average thermal oxidizer temperature was 1500° F. All parameters were within their respective range requirement and the subsequent resulting control efficiency was greater than 99%. Based on these results, AVX proposes the permitted parameters and indicator range for proper operation of the CMAP build up abatement system.

### 6. Performance Criteria

<u>Representative Data</u> – Acquisition of representative data is assured by the system's existing Data Acquisition and Handling System (DAHS).

**Quality Assurance and Control Procedures -** Current procedures include daily inspections of:

- Adsorber inlet pressure
- Airlift blower pressure
- Adsorber hopper BAC level
- Fluidization appearance on trays
- Check all site glasses for BAC (adsorber, desorber, overflow)
- Desorber temperature profile
- Desorber electrical profile

Any maintenance performed (periodic or repair) on the system devices is documented and maintained onsite. The system is also equipped with parametric alarms at the unit and at the control room CPU.

<u>Monitoring Frequency</u> – As specified in the operating permit, the thermal oxidizer shall be equipped with continuous temperature gauge, requiring daily recording. The control system is equipped to continuously monitor all parameters (pressure and temperature), with daily recordings of each.

**<u>Data Collection Procedure</u>** – The parametric data is recorded in the DAHS.

<u>Data Averaging Period</u> – The averaging period is every 5-mintes.

### 7. Performance Test Data

As previously indicated, a source test was conducted on the CMAP build up VOC control system on February 26, 2009. The system successfully met the operating permit requirements. The air permit does not require regularly scheduled stack emissions testing for compliance demonstrations.

### 8. Implementation Plan

The parametric monitoring system are already installed and in operation and in compliance with the operating permit.

7

### TABLE 1

# Compliance Assurance Monitoring Plan Summary VOC Emissions From Adsorber/Desorber/Thermal Oxidizer CMAP Build Up

### I. Background

A. Emissions Unit

Description: 24 CMAP Build Up Machines Control: 2 – 5,000 cfm adsorber/desorbers

1 – 14,000 cfm adsorber/desorber 1 – 1.0 MMBtu/hr thermal oxidizer

Facility: AVX Corporation

Myrtle Beach, South Carolina

B. Applicable Regulation

Regulation No.: N/A
Regulated Pollutant: VOC
Emission Limit: N/A

### II. Monitoring Approach

The key elements of the monitoring approach for PM compliance, including indicators to be monitored, indicator ranges, and performance criteria are presented below:

 Item
 Description

 1. Indicator
 1. Adsorber ΔP

2. Desorber Temperature

3. Thermal Oxidizer Temperature

2. Indicator Range 1.  $2'' - 5'' H_2O$ 

2. 350 – 500 degrees F 3. 1400 – 1800 degrees F

3. Performance Criteria

a. Representative Data 40 CFR 60, Appendix B, PS-1

b. Verification of Operational DAHS

Status

c. Quality Assurance and Routine inspection and repair

**Control Practices** 

d. Monitoring Frequency Every 10-seconds
e. Averaging Period Every 6-minutes

e. Data Collection Procedure Continuously recorded in DAHS

f. Recordkeeping Records are maintained on file (hard copy or electronic) for a period of 5

years

g. Reporting Quarterly Emissions Reports

Semi-annual Compliance Reports
Annual Compliance Certification

h. Frequency of Reporting Quarterly, Semi-annually, Annually

## **APPENDIX H**

FEBRUARY 23, 2011 LETTER TO DHEC
DESORBER PARAMETRIC PERMIT LIMITS



801 17<sup>th</sup> Avenue South, PO Box 867 Myrtle Beach, SC 29578-0867 Tel(843)946-0395

February 23, 2011

Ms. Elizabeth J. Basil South Carolina Department of Health and Environmental Control Bureau of Air Quality 2600 Bull Street Columbia, SC 29201

Re:

AVX Corporation – Desorber Temperature Ranges

Myrtle Beach, Horry County, SC

Permit No. TV-1340-0002

Ms. Basil,

Per the February 4, 2011 meeting between the Department of Health and Environmental Control (DHEC) and AVX, the subject of the high and low desorber bed temperature limits in the AVX Title V permit was discussed. For your reference, the attached table presents excursions below and above the 350°F and 500°F temperature limits and work order descriptions for each excursion. These excursions will be submitted to DHEC in the annual compliance certification due September 2011. AVX is requesting that DHEC consider revising the bed temperature limits for AD-1, AD-2, and AD-3 be based on the technical merit of operating knowledge of the devises and current production levels.

### Temperatures Above 500°F

The existing permit limits were established based on information AVX provided DHEC during the design of the adsorber/desorbers (A/D) devices. The 500°F limit was set based simply on the boiling points of the solvents used in the chip manufacturing department and at a time when chip production was at a much higher rate than it is today. As indicated in the attached letter from Mr. Hal Cowles of Environmental C&C, Inc., desorber temperatures above 500°F is normal and beneficial for the AVX device. At higher temperatures the engineered carbon pore volume increases providing more capacity in the adsorption cycle. AVX is requesting that the upper permit limit be revised to 650°F during the Title V renewal process.

### Temperatures Below 350°F

As communicated on many occasions, the AVX Myrtle Beach facility has much lower production levels than when the A/D units were originally installed. Most excursions below the 350°F lower limit occur during system ramp up, prior to chip manufacturing startup. The systems are shut down to conserve energy on weekends or possibly weekdays when there is no chip manufacturing. AVX is proposing language in the permit such as:

### Current Condition B.11

Temperature readings shall be within the ranges specified in Table X.X during capacitor chip manufacturing.

This will eliminate low temperature excursions prior to beginning the chip manufacturing processes.

AVX is aware that the renewed Title V permit will require performance testing of the A/D and thermal oxider control system. Testing will be conducted within the parametric permit limits as stated in the new Title V operating permit.

As indicated, any changes that are agreeable with DHEC will be incorporated into the Title V renewal application.

If you have any questions, please call me at (843) 946-0395.

Regards.

Larry Blue

Principal Environmental Engineering Specialist

Enc

# **ATTACHMENT 1**

**Desorber Temperature Excursions** 

DESORBER TEMPERATURE EXCURSIONS (Since Sept 2009) AVX Myrtle Beach

_		_	_	_	_	_	_			_					_	_				_	_	_	
Work Performed	Adjusted temp controls & cleaned scrubbers	reset controls on desorber #3					Reset carbon flows and temp controls for desorber #3 temp	Set CV max to 50	Adjusted temp control & increased CV max	Desorber #4 increased carbon flow and lowered CV max control	Desorber #3 temp came back up once production resumed	Desorber #4 temp, restarted carbon flow and brought up to temp	Desorber #4 temp, reset temp controls, production had increased air	Desorber #2 temp, reset carbon flow	Caused by no load on system	Low production	Reset carbon flow	Reset CV max	Desorber #2 cleaned carbon from defuser plate, set carbon flow	Desorber #3 cleaned nozzle & reset carbon flow		Adjusted CV max down to 51%	Reset CV max to 51%, lowered carbon flow
Work Order	545704/545705	546246	NO RECORD	546254	546257	NO RECORD	545044	544497	544645	542959	542966	542969	544640	544493	544179	545759	545765	544315	544325	544772	543336	543313/543366	543369
Date Repaired	9/2/2009	10/11/2009	12/6/2009	12/13/2009	12/31/2009	1/3/2010	2/18/2010	3/28/2010	4/28/2010	5/9/2010	5/30/2010	6/6/2010	6/8/2010	6/13/2010	6/21/2010	6/27/2010	7/25/2010	7/27/2010	8/9/2010	8/16/2010	9/13/2010	12/6/2010	12/8/2010
From	9/2/2009	10/10/2009	12/5/2009	12/12/2009	12/31/2009	1/1/2010	2/18/2010	3/27/2010	4/28/2010	5/9/2010	5/30/2010	6/6/2010	6/8/2010	6/12/2010	6/19/2010	6/26/2010	7/25/2010	7/27/2010	8/9/2010	8/14/2010	9/13/2010	12/4/2010	12/8/2010
Problem	HIGH TEMP	HIGH TEMP	LOW TEMP	LOW TEMP	LOW TEMP	LOW TEMP	LOW TEMP	HIGH TEMP	LOW TEMP	HIGH TEMP	LOW TEMP	LOW TEMP	LOW TEMP	HIGH TEMP	HIGH TEMP	HIGH TEMP	HIGH TEMP	LOW TEMP	LOW TEMP	HIGH TEMP	HIGH TEMP	HIGH TEMP	LOW TEMP
Temp.	573.8	514.3	331.8	333.3	319.6	320.9	97.0	509.7	306.6	543.9	339.4	330.4	299.1	602.9	516.3	510.4	604.4	328.6	75	578.4	508.1	584	327.2
Description of unit	DESORBER MB2 #3 573.8F	DESORBER MID-BED 514.3F	DESORBER #3 331.8F	DEBORBER #3 333.3F	DESORBER #3 319.6F	DESORBER #3 320.9F	DESORBER #3 97.0F	DESORBER #3 509.7F	DESORBER #4 306.6F	DESORBER #4 543.9F	DESORBER #3 339.4F	DESORBER #4 TEMP 330.4F	DESORBER #4 TEMP 299.1F	DESORBER #2 605.9F	DESORBER #3 516.3F	DESORBER #3 510.4F	DESORBER #2 604.4F	DESORBER #2 328.6F	Desorber	Desorber	Desorber	Desorber	Desorber
Equip#	3	က	က	က	ဗ	က	က	3	4	4	3	4	4	2	3	3	2	2	2	ဧ	3	3	က

# **ATTACHMENT 2**

Environmental C&C, Inc. Communication

# Environmental C&C, inc.

Solvent Recovery & VOC Abatement Systems



February 16, 2011

AVX Corporation 801 17<sup>th</sup> Avenue South P.O Box 867 Myrtle Beach, S.C. 29578-0867

Attn: Mr. Larry Blue

Re: AVX Desorber Temperature Settings

To Whom It May Concern:

As a point of clarification, the upper temperature limit setting on the desorbers at AVX is arbitrary to some extent. In a temperature swing adsorption/desorption process such as this, a higher temperature on the desorber side typically is better — within reason. As the temperature increases in the desorption step, more capacity and more pore volume are recovered. This translates to more adsorption potential on the adsorber side.

Since the stripping gas in these desorbers is pure nitrogen, there are no side reactions from the presence oxygen, which can foul carbon. This carbon is an engineered material, so there are not metals or ash, which cause catalytic side reactions if oxygen were present. Therefore, there is no issue with an upper limit setting of something even as high as 650 F to 700 F. it is not recommended that the desorber be operated full time in that temperature range, since there may be some materials present at low levels which may break down over time, and also the economics (that is energy use) are less favorable. However, occasional and brief occurrences of temperatures in that range cause no issues in this nitrogen stripped design.

Best regards,

Hal Cowles

President

(518) 225-0315 (cellular)

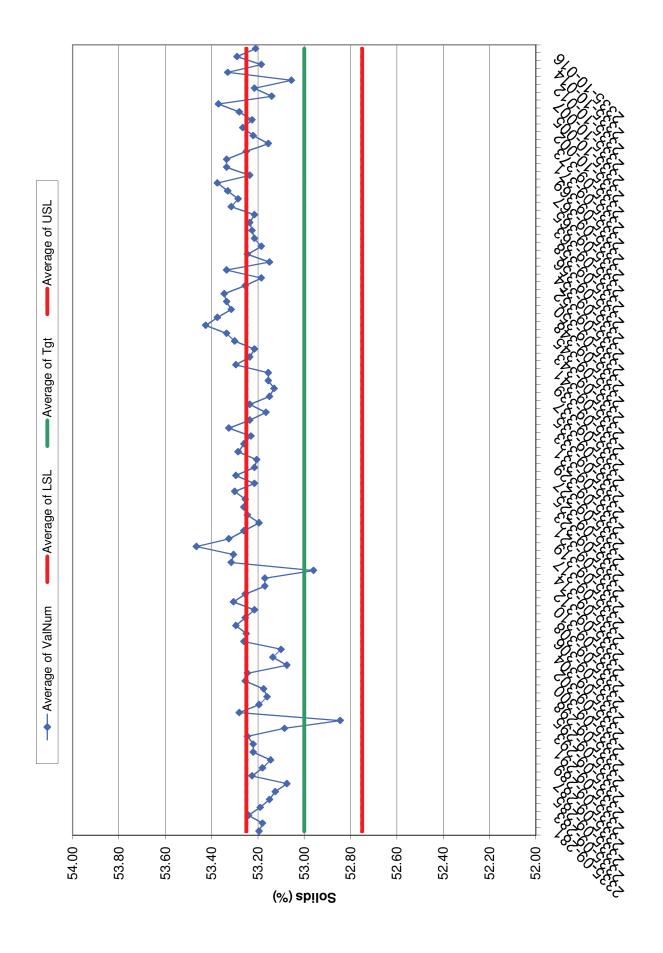
Hal Coules

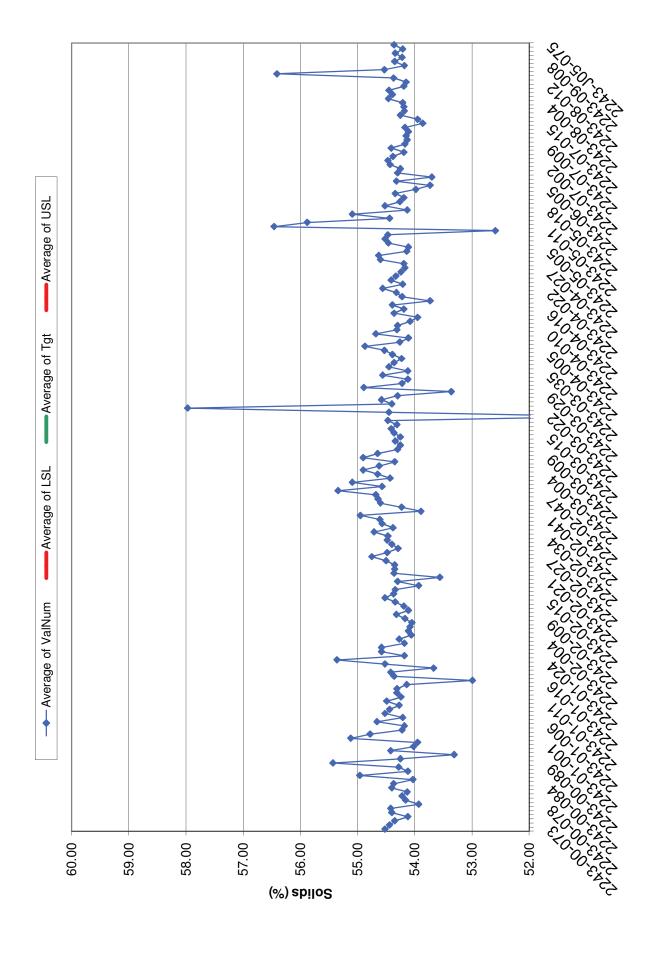
halc@ecnc.com

# **APPENDIX I**

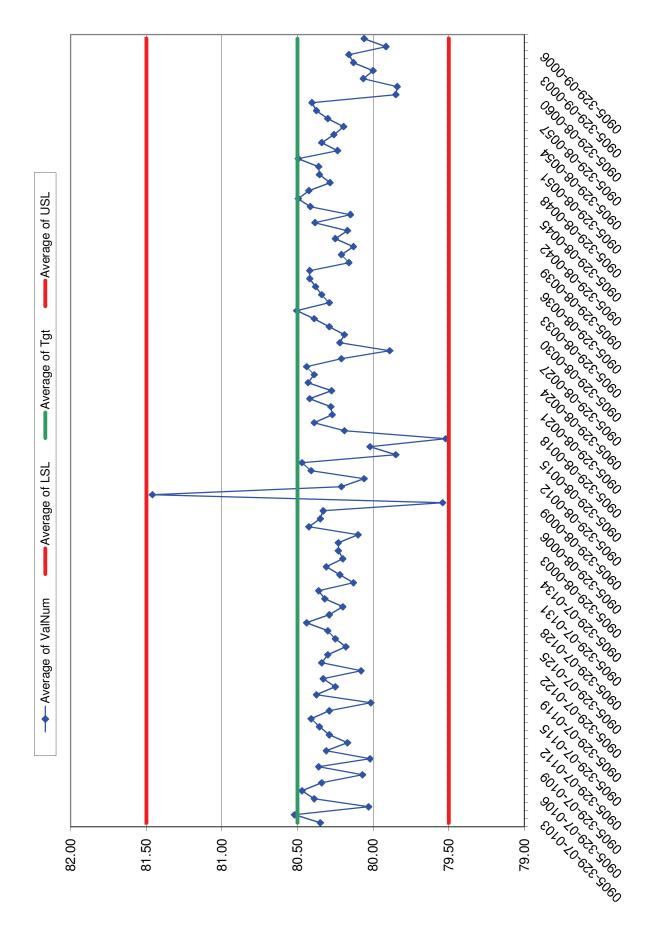
**Supporting Documentation** 

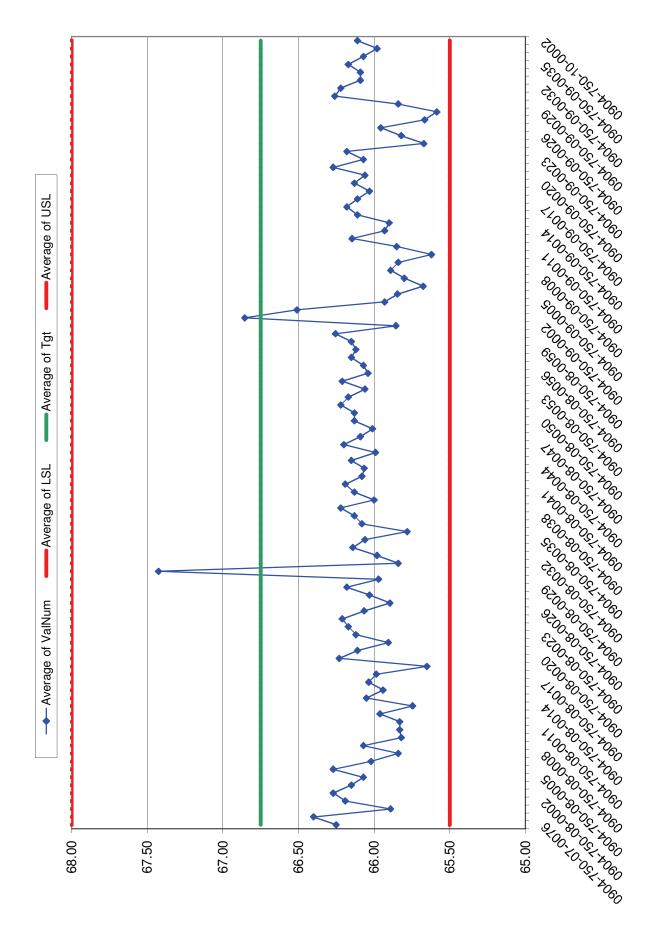
Electrode Ink Target Variance





Slip Target Variance





Source Testing



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# STATIONARY SOURCE SAMPLING REPORT

# **FOR**

# **AVX CORPORATION**

# MYRTLE BEACH, SOUTH CAROLINA

Adsorber Inlet
Adsorber Exhaust
Thermal Oxidizer Exhaust
VOC Sampling

Integrity Project No. 09-005

Qui Date 04/07/09

Performed: February 26, 2009

Certified By:

James A. Lewis, QSTI

Vice President

Intgerity Air Monitoring, Inc.

J.A. Tony Blanton, QSTI

President

Integrity Air Monitoring, Inc.

# TABLE OF CONTENTS

1.0 INTROI	OUCTION	3
1.1	Purpose	3
1.2	Outline of Test Program	3
1.3	Test Participants	4
e e	Table 1 – Test Participants	4
2.0 RESULT	ΓS	5
2.1	Summary of Results	5
	Table 2 – Summary of VOC Sampling Results	5
	Table 3 – Summary of BCPM Loading Rate Results – Adsorber Inlet	5
2.2	Discussion	6
3 0 PROCES	SS DESCRIPTION	7
3.0 T ROCE.	Air Pollution Control Equipment	7
3.2	Demonstration of Operating Rate	7
	ING METHODS	
4.0 SAMPL:	Sampling Strategy	88
4.1	Sampling and Analytical Procedures	8
4.2	Table 4 – Sampling and Analytical Procedures	8
	4.2.1 Sampling Ports, Traverse Points and Cyclonic Flow	
	Determination	8
	4.2.2 Stack Gas Velocity and Volumetric Flow Rate Determination	9
	4.2.3 Dry Molecular Weight Determination	9
	4.2.4 Moisture Determination	9
	4.2.5 VOC Analyzer Procedures	10
	4.2.6 Response Factor Development Procedures	11
	4.2.7 Sampling Ports and Points	12
	Figure 1 – Adsorber Inlet Drawing and Location of Sampling Ports	13
	Figure 2 – Adsorber Exhaust Drawing and Location of Sampling Ports	14
	Figure 3 – Thermal Oxidizer Stack Drawing and Location of Sampling	1.7
	Ports	15
4.3	Quality Assurance and Quality Control	10
	Table 5 – Project QA Activities and Results	
5.0 APPENI	DICES	17
1.	Detailed Summary of Results and Example Calculations	
2.	Field Data Sheets and System Drift Checks	
3.	Data Acquisition System Values	
4.	Calibration Data and Protocol Gas Certificates of Analysis	
5.	Facility Production Documentation	

# 1.0 INTRODUCTION

This test program was performed at the AVX Corporation facility in Myrtle Beach, South Carolina on the volatile organic compound (VOC) control system for the Passive Electronic Part Build Up Machines. This section of the report describes the test purpose and provides a brief outline of the test activities and the personnel involved in the test program.

# 1.1 Purpose

The AVX Corporation facility is covered by Title V Air Quality Permit No. TV-1340-0002; however, the testing was performed at the request of SC DHEC.

# 1.2 Outline of Test Program

Integrity Air Monitoring, Inc. (Integrity) performed stationary source sampling simultaneously at the Adsorber Common Inlet, the Adsorber Exhaust and the Thermal Oxidizer Exhaust on February 26, 2009. The sampling included three 1-hour sampling runs for VOC emissions using EPA Reference Method 25A at each location. In addition to the sampling performed for VOCs, Integrity also performed US EPA Reference Methods 1 through 4 to determine the location of the sampling points, the volumetric flow rate, the molecular weight of the stack gas and the moisture content, respectively.

Due to current economic conditions, AVX is not operating the build up process at maximum capacity. In order to simulate maximum VOC loading to the adsorber during emissions testing, simultaneous spiking was performed at three build up machines. AVX identified 2-butoxyethanol 70%, PGME 30 % (BCPM) as the majority VOC used in the build up process. A known quantity of BCPM was atomized and injected into each machine during each sampling run. O'Brien & Gere personnel assisted AVX with the spiking procedure.

Representatives of the South Carolina Department of Health and Environmental Control (SC DHEC) requested that AVX quantify the "as measured" loading rate of BCPM to the adsorber to verify the measured injection rate recorded during sampling. AVX provided Integrity with a sample of the BCPM used for spiking. Integrity utilized an organics laboratory to develop gaseous VOC standards from the BCPM that were subsequently analyzed by the same VOC analyzer used for sampling at the adsorber inlet. The analyzer responses were used to develop a response factor for BCPM relative to carbon. The response factor was then applied to the adsorber inlet sampling results to determine the "as measured" BCPM loading rates to the adsorber inlet.

## 2.0 RESULTS

This section presents the mean sampling results. Detailed sampling results for each sampling run and example calculations are presented in Appendix 1. Field data sheets and system bias and drift checks are presented in Appendix 2. Data acquisition system uncorrected values and values corrected for system bias are presented in Appendix 3.

# 2.1 Summary of Results

The following tables present the mean results from the sampling performed at the VOC control system serving the Build up Machines on February 26, 2009.

Table 2 – Summary of VOC Sampling Results									
Source	Concentration, ppm	Loading/Emission Rate,	Control Efficiency, %						
	as carbon dry	lbs/hr as carbon							
Adsorber Inlet	873.4	10.17	NA						
Adsorber Exhaust	3.6	0.05	99.51†						
Oxidizer Exhaust	1.7	0.0008	99.99‡						
VOC Control System	NA	NA	99.50						

<sup>†</sup> Adsorber control efficiency, % = ((adsorber inlet lb/hr - adsorber exhaust lb/hr) / adsorber inlet lb/hr) X 100

Table 3 – Summary BCPM Loading Rate Results – Adsorber Inlet								
Run	Loading Rate As Carbon, Adjusted	Spiking Rate, Gravimetric						
	for Response Factor†	Determination						
1	22.57	21.21						
2	25.91	22.20						
3	25.31	22.20						
Average	24.59	21.87						

 $<sup>\</sup>dagger$  Calculations are provided in Appendix 1.

<sup>‡</sup> Oxidizer control efficiency, % = (((adsorber inlet lb/hr – adsorber exhaust lb/hr) – oxidizer exhaust, lb/hr) / (adsorber inlet lb/hr – adsorber exhaust lb/hr) X 100

# 2.2 Discussion

The results of the sampling indicate that the VOC control system had an overall VOC control efficiency of 99.50%. Furthermore, the results of the adsorber inlet VOC sampling adjusted for the response factor confirm that the measured spiking rates were accurate and that AVX properly challenged the VOC control system under maximum process operation.

# 3.0 PROCESS DESCRIPTION

This section contains a brief description of the process and related control equipment.

The AVX Corporation facility located in Myrtle Beach, South Carolina produces electronic capacitors. There are two 'cells' each comprised of eight passive electronic parts build up machines which operate independently. Solvent VOC emissions from the ceramic slip material for the build up processes are captured at each machine and manifolded to a single common duct at each cell. The raw solvent constituents (2-butoxyethanol 70%, PGME 30%) are known as BC/PM or AVX Blend. BC/PM was injected directly into the fume hoods of three machines using six high pressure paint guns designed to atomize the solvent. A single paint pot was used to provide the solvent to all of the paint guns. The solvent pot weight was recorded at regular intervals during the testing as well as the beginning and end of each test run. This information was used to calculate the pounds per hour of solvent used on a mass-basis.

# 3.1 Air Pollution Control Equipment

Emissions from the cells were vented to an emissions control system consisting of a carbon concentrator manufactured by FluiSorb and a common attendant thermal oxidizer

# 3.2 Demonstration of Operating Rate

Process and control device operating parameters corresponding with the sampling were recorded once every 15 minutes by AVX Corporation personnel. The parameters recorded included adsorption unit  $\Delta P$ , desorption temperature and thermal oxidizer combustion chamber temperature. This documentation is included in Appendix 5.

When the wet bulb temperature has stabilized, record both the wet bulb and dry bulb thermometer temperatures.

The flue gas moisture content (PMV) was then calculated using saturated vapor and moisture equations.

The moisture content at the thermal oxidizer exhaust (>140 °F) was performed using the following sampling system and procedures:

- A heated ( $248^{\circ}F \pm 25^{\circ}F$ ) probe;
- A moisture condensing train consisting of four sequential impingers. Impingers one and two contained 100 ml each of deionized water followed by an empty impinger and a final impinger containing 200 grams of silica gel; and
- A Method 5 type metering system capable of maintaining a constant sampling rate.

At the end of the test run, the liquid in the first three impingers was measured to the nearest milliliter. The moisture collected by the silica gel was determined to the nearest 0.1 gram. These measurements were recorded on the Method 4 data form. The moisture content of the emission source was calculated according to the equations in Method 4, Section 12.

# 4.2.5 VOC Analyzer Procedures

Total gaseous organic(s) or total hydrocarbon(s) concentrations and emission rates were determined according to EPA Method 25A. Method 25A applies to the measurement of total gaseous organic concentration of vapors consisting primarily of alkanes, alkenes, and/or arenes (aromatic hydrocarbons). The concentration is expressed in terms of propane (or other appropriate calibration gas) or in terms of carbon.

Sampling for total gaseous organic(s) was performed using a VIG Industries Model 210 (dual channel) analyzer and one VIG Industries Model 20 analyzer. The principal components of each sampling systems were sequentially:

- A heated stainless steel sample probe;
- A heated system calibration assembly and filter;
- A heated sample line;
- An FIA analyzer;
- Calibration gases; and
- A data acquisition system that continuously logs 1-minute concentrations.

Prior to the test series, the heated sample lines were heated to 360°F and the hydrocarbon analyzers were heated above 200°C to prevent condensation. After temperatures were stabilized the hydrocarbon analyzers were ignited using a 40% hydrogen balance helium fuel and hydrocarbon free air. Calibration procedures commenced with the introduction of zero and high-level calibration gas into the sampling system. The necessary adjustments were made and the responses for low-level and mid-level gases were recorded. The predicted values for the calibration gases and the actual responses were recorded on the field data sheet and by the data acquisition system. High-level and zero gas concentrations were introduced into the measurement system and the response time was recorded on the field data sheet. Sampling was initiated immediately following instrument calibration. At the conclusion of the first hour, the zero and mid-level calibration gases were reintroduced and their respective responses recorded on the field data sheet. Integrity utilized a STEC 710-C gas divider according to Method 205 to create multi-level calibration gases from a single upscale standard. A certificate of calibration for the gas divider is provided in Appendix 5.

The zero and calibration drift checks were performed immediately following completion of the test run and at the conclusion of the test program. The data collected during the test program was archived on a data acquisition system and is attached to this test report as Appendix 3. The DAS used by Integrity Air Monitoring, Inc. for this project was an IBM computer with hard disk storage and a Superlogics data shuttle recorder.

# 4.2.6 Response Factor Development Procedures

The response factor was established using a product designated as *Blend AVX 70/30 (Blend)* manufactured by Brenntag Southeast, Inc. Three separate concentrations of the *Blend* were generated volumetrically using the following procedures:

- Three 12 liter glass canisters were evacuated using a vacuum pump;
- These canisters were heated and maintained at a constant temperature of ~150°F and allowed to thermally stabilize;
- Each canister was then injected with a known amount of the *Blend*, the product was allowed to vaporize and then the canister was pressurized to ~1400 mm mercury gauge pressure with zero air;
- A constant gas stream from the pressurized canisters was delivered to via a heated umbilical line to the VIG Model 20 Flame Ionization Analyzer were the response to the standard was measured as parts per million by volume (ppmv) propane.

The ppmv concentration of the *Blend* was calculated using the molecular weight and purity furnished by the vendor, canister temperature, pressure and the amount of the product injected into each canister. The three

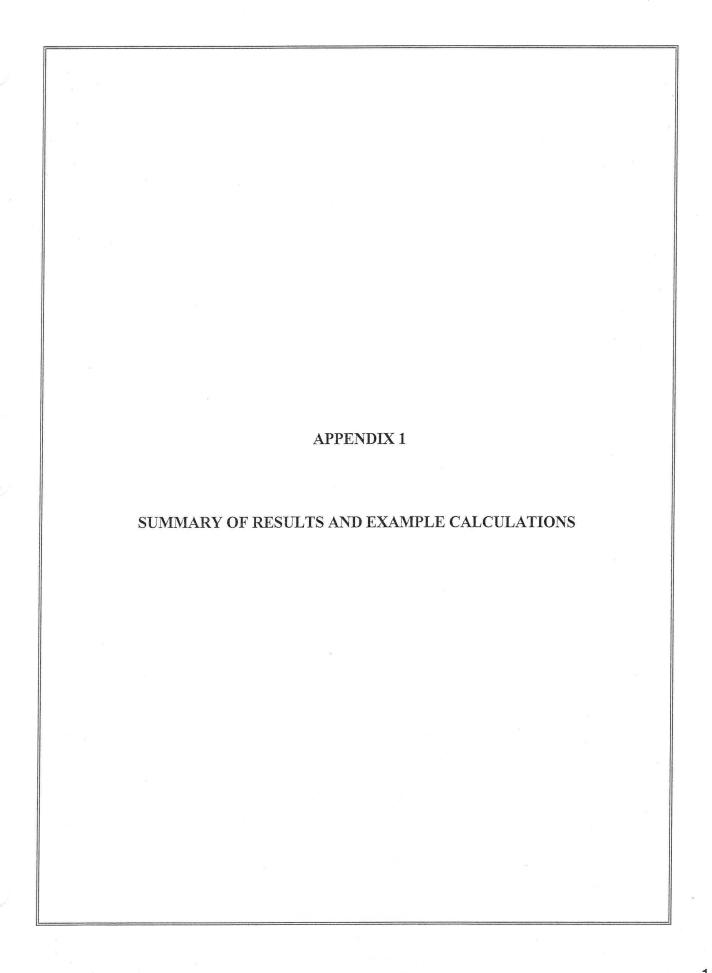
concentrations of the product generated for this project were: low = 135 ppmv, medium = 269 ppmv and high = 402 ppmv. The calculation used to determine the concentrations was as follows:

Concentration (ppmv) = (Mass of Blend AVX 70/30) (24.056)
(Molecular Weight of Blend AVX 70/30) (Volume of gas in pressurized glass canister)

The response factor Method 25A FIA instrumentation operational parameters, reference standard calculations and laboratory report and supporting documentation can be found in Appendix 1.

# 4.2.7 Sampling Ports and Points

The dimensions of the sampling locations and the location of the sampling ports and points are detailed in Figures 1, 2 and 3. The drawings provided are not to scale. For the VOC sampling at the Adsorber Exhaust, a stratification check was performed prior to sampling and the source was unstratified. All other VOC sampling was performed at single point near the center of each stack.



# SUMMARY OF RESULTS EPA METHOD 25A Determination of Total Gaseous Organics AVX Corporation Myrtle Beach, SC

Adsorber Inlet



Run Nu	mber	1	2	3	Avg
Date:		02/26/09	02/26/09	02/26/09	
θ	Net Time of Test, minutes	60	60	60	
Ts	Test Start Time	1350	1505	1615	
Te	Test End Time	1449	1604	1714	
$P_{\text{bar}}$	Barometric Pressure, in. Hg	29.74	29.71	29.71	29.72
$P_{g}$	Static Pressure, in. Hg	-0.140	-0.140	-0.140	-0.140
$P_s$	Stack Pressure, Absolute, in. Hg	29.600	29.570	29.570	29.580
WB	Wet Bulb Temp., Deg. F $_{\dagger}$	66.1	66.3	66.5	66.3
DB	Dry Bulb Temp., Deg. F $_{\dagger}$	84.6	84.6	84.9	84.7
$S_{ ext{VP}}$	Vapor Pressure of Water at Saturation, in. Hg	0.647	0.651	0.656	0.651
$B_{\text{ws}}$	Moisture Content of Gas Stream	0.015	0.015	0.015	0.015
$P_{MV}$	Percent Moisture in Stack	1.49	1.52	1.53	1.51
$\mathrm{M}_{\scriptscriptstyle\mathrm{FD}}$	Mole Fraction of Dry Gas	0.985	0.985	0.985	0.985
$\%O_2$	Percent Oxygen, Dry	21.0	21.0	21.0	21.0
%CO <sub>2</sub>	Percent Carbon Dioxide, Dry	0.0	0.0	0.0	0.0
%CO	Percent Carbon Monoxide, Dry	0.0	0.0	0.0	0.0
$\mathrm{M}_{\mathrm{d}}$	Mole. Wt. Stack Gas, Dry Basis, lb/lb mole	28.840	28.840	28.840	28.840
$M_{\scriptscriptstyle S}$	Mole. Wt. Stack Gas, Wet Basis, lb/lb mole	28.678	28.676	28.674	28.676
Cp	Pitot Tube Constant	0.84	0.84	0.84	0.84
$\Delta PS$	Avg. Sqrt. Delta P, in. H20	0.598	0.615	0.607	0.607
$T_{s}$	Avg. Stack Temp., Deg. F	82.8	82.7	82.63	82.7
$V_{\scriptscriptstyle S}$	Avg. Stack Velocity, ft/sec	34.3	35.3	34.9	34.9
A	Area Stack, ft <sup>2</sup>	3.14	3.14	3.14	3.14

# SUMMARY OF RESULTS EPA METHOD 25A Determination of Total Gaseous Organics AVX Corporation Myrtle Beach, SC Adsorber Inlet



Run Num	ber	1	2	3	Avg
Date:		02/26/09	02/26/09	02/26/09	
$Q_{\text{SD}}$	Gas Volume Flow, Dry Std. Cond. CFM	6,136	6,307	6,228	6,224
$Q_{A}$	Actual Gas Volume Flow, CFM	6,473	6,661	6,577	6,570
$Q_{sw} \\$	Gas Volume Flow, Wet Std. Cond., CFM	6,229	6,404	6,325	6,320
Total G	aseous Organics As Carbon				
$\mathrm{M}_{\mathrm{WC}}$	Mole Weight of Carbon, g/mole	12.01	12.01	12.01	12.01
$C_{meas}$	Organic Concentration, ppm as propane (wet)	267.1	298.2	295.0	286.7
$C_c$	Organic Concentration, ppm as carbon (wet)	801.2	894.5	884.9	860.2
$C_{d}$	Organic Concentration, ppm as carbon (dry)	813.3	908.2	898.6	873.4
$C_{\scriptscriptstyle ON}$	Organic Concentration, mg/dscm as carbon	406.1	453.5	448.7	436.1
$C_{\scriptscriptstyle AN}$	Organic Concentration, gr/dscf as carbon	0.18	0.20	0.20	0.19
$C_{\scriptscriptstyle AW}$	Organic Loading Rate, lbs/hr as carbon	9.34	10.72	10.47	10.17
Total G	aseous Organics as BCPM				
$M_{\text{WC}}$	Mole Weight of BCPM, g/mole	109.76	109.76	109.76	109.76
Rf	BCPM Response Factor	1.26	1.26	1.26	1.26
$C_d$	Organic Concentration, ppm as propane (dry)	271.1	302.7	299.5	291.1
$C_{\text{c as BCPM}}$	Organic Concentration, ppm as BCPM	215.2	240.3	237.7	231.1
$C_{\text{on}}$	Organic Concentration, mg/dscm as BCPM	981.8	1096.4	1084.7	1054.3
$C_{\scriptscriptstyle AN}$	Organic Concentration, gr/dscf as BCPM	0.43	0.48	0.47	0.46
$C_{\scriptscriptstyle AW}$	Organic Loading Rate, lbs/hr as BCPM	22.57	25.91	25.31	24.59

# SUMMARY OF RESULTS EPA METHOD 25A

Determination of Total Gaseous Organics

AVX Corporation Myrtle Beach, SC Adsorber Exhaust



Run Nun	nber	1	2	3	Avg
Date:		02/26/09	02/26/09	02/26/09	
θ	Net Time of Test, minutes	60	60	60	
Ts	Test Start Time	1350	1505	1615	
Те	Test End Time	1449	1604	1714	
$\mathrm{P}_{\mathrm{bar}}$	Barometric Pressure, in. Hg	29.74	29.71	29.71	29.72
$P_{g}$	Static Pressure, in. Hg	0.001	0.001	0.001	0.001
$P_{S}$	Stack Pressure, Absolute, in. Hg	29.741	29.711	29.711	29.721
WB	Wet Bulb Temp., Deg. F $_{\dagger}$	67.0	69.0	66.0	67.3
DB	Dry Bulb Temp., Deg. F $_{\dagger}$	90.0	91.0	91.0	90.7
$S_{ ext{VP}}$	Vapor Pressure of Water at Saturation, in. Hg	0.667	0.715	0.645	0.676
$\mathrm{B}_{\mathrm{ws}}$	Moisture Content of Gas Stream	0.014	0.016	0.012	0.014
$\mathrm{P}_{MV}$	Percent Moisture in Stack	1.38	1.58	1.23	1.40
$M_{\scriptscriptstyle FD}$	Mole Fraction of Dry Gas	0.986	0.984	0.988	0.986
$\%O_2$	Percent Oxygen, Dry	21.0	21.0	21.0	21.0
%CO <sub>2</sub>	Percent Carbon Dioxide, Dry	0.0	0.0	0.0	0.0
%CO	Percent Carbon Monoxide, Dry	0.0	0.0	0.0	0.0
$M_{\text{\tiny d}}$	Mole. Wt. Stack Gas, Dry Basis, lb/lb mole	28.840	28.840	28.840	28.840
$M_{\scriptscriptstyle S}$	Mole. Wt. Stack Gas, Wet Basis, lb/lb mole	28.690	28.669	28.706	28.688
$C_p$	Pitot Tube Constant	0.84	0.84	0.84	0.84
$\Delta PS$	Avg. Sqrt. Delta P, in. H20	0.321	0.335	0.323	0.327
$T_s$	Avg. Stack Temp., Deg. F	86.0	86.8	86.1	86.3
$V_s$	Avg. Stack Velocity, ft/sec	18.4	19.3	18.6	18.8
A	Area Stack, ft <sup>2</sup>	6.25	6.25	6.25	6.25

# SUMMARY OF RESULTS EPA METHOD 25A Determination of Total Gaseous Organics AVX Corporation Myrtle Beach, SC Adsorber Exhaust



Run Num	ber	1	2	3	Avg
Date:		02/26/09	02/26/09	02/26/09	
$Q_{\scriptscriptstyle SD}$	Gas Volume Flow, Dry Std. Cond. CFM	6,556	6,827	6,608	6,664
$Q_{\text{A}}$	Actual Gas Volume Flow, CFM	6,916	7,234	6,969	7,039
$Q_{sw} \\$	Gas Volume Flow, Wet Std. Cond., CFM	6,648	6,937	6,691	6,758
Total G	aseous Organics As Carbon				
$M_{\text{WC}}$	Mole Weight of Carbon, g/mole	12.01	12.01	12.01	12.01
$\mathbf{C}_{meas}$	Organic Concentration, ppm as propane (wet)	1.1	1.2	1.3	1.2
$C_c$	Organic Concentration, ppm as carbon (wet)	3.2	3.5	4.0	3.6
$C_{\text{d}}$	Organic Concentration, ppm as carbon (dry)	3.2	3.6	4.1	3.6
$C_{\text{on}}$	Organic Concentration, mg/dscm as carbon	1.6	1.8	2.0	1.8
$C_{\scriptscriptstyle AN}$	Organic Concentration, gr/dscf as carbon	0.0007	0.0008	0.0009	0.0008
$C_{AW}$	Organic Emission Rate, lbs/hr as carbon	0.039	0.046	0.050	0.045

# SUMMARY OF RESULTS EPA METHOD 25A

Determination of Total Gaseous Organics

AVX Corporation Myrtle Beach, SC Thermal Oxidizer Exhaust



Run Nu	mber	1	2	3	Avg
Date:		02/26/09	02/26/09	02/26/09	
Tstart	Test Start Time	1350	1505	1615	
Tend	Test End Time	1449	1604	1714	
θ	Net Time of Test, minutes	60	60	60	
$P_{\text{bar}}$	Barometric Pressure, in. Hg	29.74	29.71	29.71	29.72
$P_{g}$	Static Pressure, in. Hg	-0.001	-0.001	-0.001	-0.001
$P_{\text{S}}$	Stack Pressure, Absolute, in. Hg	29.739	29.709	29.709	29.719
$V_{\scriptscriptstyle M}$	Actual Meter Volume Sampled, cu. ft.	21.686	22.593	22.625	22.301
$\Delta H$	Avg. Delta H, in. H <sub>2</sub> 0	1.70	1.70	1.70	1.70
$T_{M}$	Avg. Gas Meter Temp., Deg. F	81.5	84.2	85.2	83.6
γ	Dry Gas Meter Correction Factor	0.975	0.975	0.975	0.975
$V_{\mathtt{STD}}$	Volume Sampled at Stand. Cond., cu. ft.	20.579	21.312	21.304	21.065
$V_{\text{C}}$	Volume of Water Collected, ml	41.9	37.0	35.5	38.1
$V_{\text{\tiny WC}}$	Volume of Water Vapor at Std. Cond.,SCF	1.97	1.74	1.67	1.80
$B_{\text{ws}}$	Moisture Content of Gas Stream	0.087	0.076	0.073	0.079
$\mathrm{P}_{\mathrm{MV}}$	Percent Moisture in Stack	8.7	7.6	7.3	7.9
$M_{\text{\tiny FD}}$	Mole Fraction of Dry Gas	0.913	0.924	0.927	0.921
$\%O_2$	Percent Oxygen, Dry	20.9	20.9	20.9	20.9
%CO <sub>2</sub>	Percent Carbon Dioxide, Dry	0.0	0.0	0.0	0.0
$M_{\text{d}}$	Mole. Wt. Stack Gas, Dry Basis, lb/lb mole	28.836	28.836	28.836	28.836
$M_{\scriptscriptstyle S}$	Mole. Wt. Stack Gas, Wet Basis, lb/lb mole	27.888	28.017	28.048	27.984
Cp	Pitot Tube Constant	0.84	0.84	0.84	0.84
$\Delta PS$	Avg. Sqrt. Delta P, in. H20	0.134	0.136	0.137	0.136

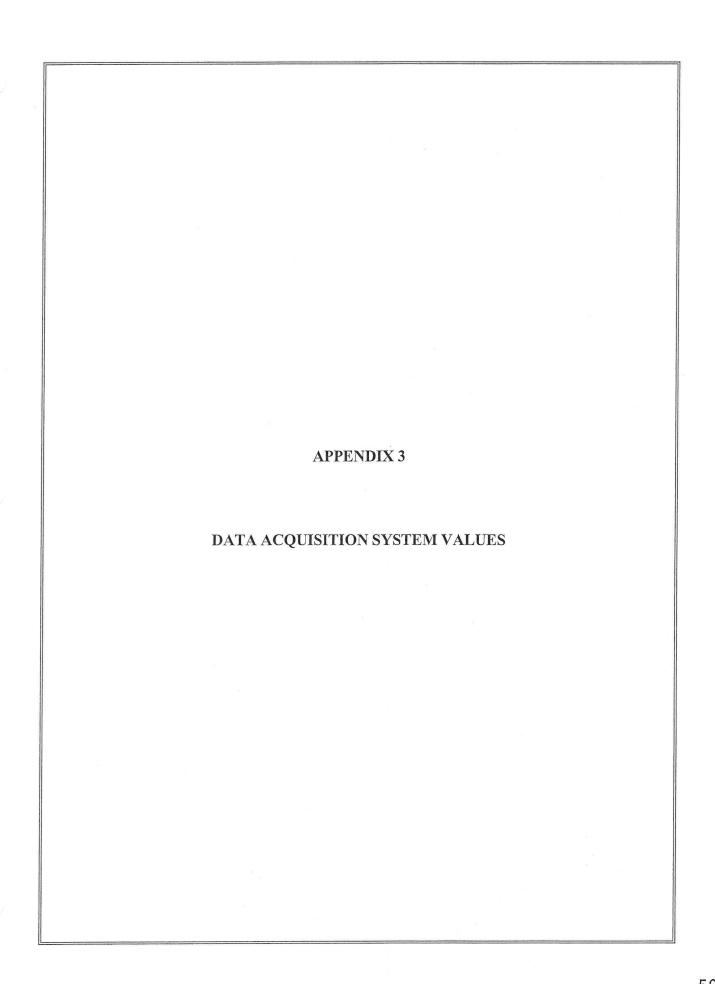
# SUMMARY OF RESULTS EPA METHOD 25A Determination of Total Gase

Determination of Total Gaseous Organics

AVX Corporation
Myrtle Beach, SC



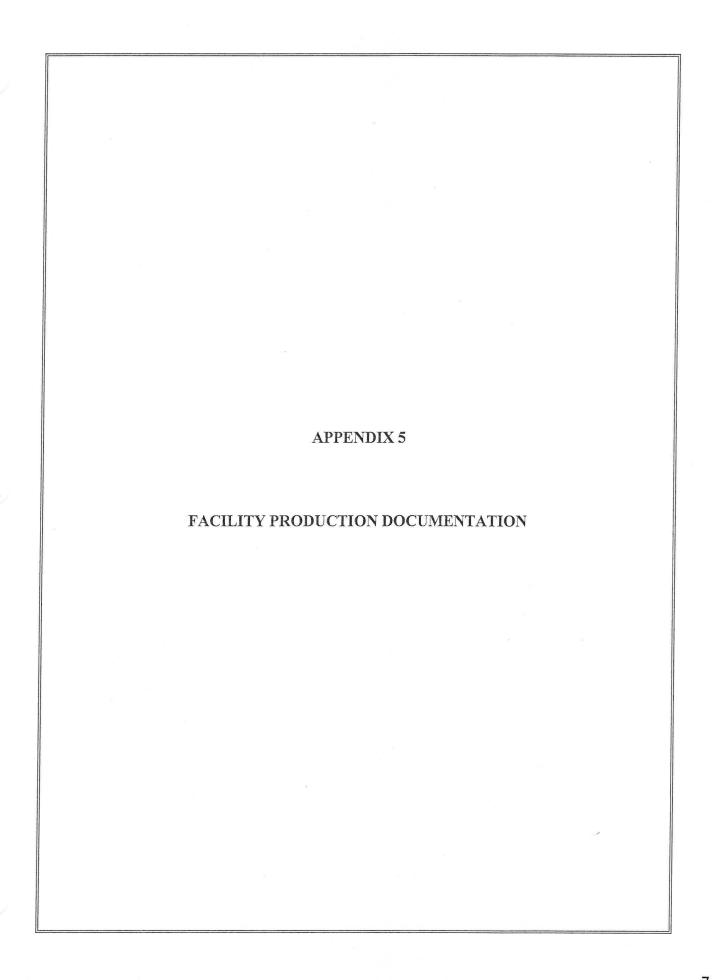
	Thermal Oxidizer Exhaust		AIR MONITORING, INC.				
$T_s$	Avg. Stack Temp., Deg. F	1019.7	1027.6	1025.7	1024.3		
$V_{\scriptscriptstyle S}$	Avg. Stack Velocity, ft/sec	12.9	13.1	13.1	13.0		
A	Area Stack, ft <sup>2</sup>	0.994	0.994	0.994	0.994		
$Q_{\text{SD}}$	Gas Volume Flow, Dry Std. Cond. CFM	248	254	256	253		
$Q_{\boldsymbol{A}}$	Actual Gas Volume Flow, CFM	767	780	783	777		
$Q_{sw} \\$	Gas Volume Flow, Wet Std. Cond., CFM	272	275	276	274		
Total	Gaseous Organics As Carbon						
$M_{\text{\tiny WC}}$	Mole Weight of Carbon, g/mole	12.01	12.01	12.01	12.01		
$C_{\text{meas}}$	Organic Concentration, ppm as propane (wet)	0.6	0.6	0.2	0.5		
$C_{c}$	Organic Concentration, ppm as carbon (wet)	1.9	1.9	0.7	1.5		
$C_{d}$	Organic Concentration, ppm as carbon (dry)	2.1	2.1	0.8	1.7		
$C_{\text{on}}$	Organic Concentration, mg/dscm as carbon	1.1	1.0	0.4	0.8		
$C_{\scriptscriptstyle AN}$	Organic Concentration, gr/dscf as carbon	0.0005	0.0005	0.0002	0.0004		
$C_{\mathrm{AW}}$	Organic Emission Rate, lbs/hr	0.0010	0.0010	0.0004	0.0008		



AVX Corporation Myrtle Beach, SC Adsorber & Thermal Oxidizer VOC Raw Data 02/26/09



Time	Inlet	Outlet	Thermal Oxidizer	Time	Inlet	Adsorber Outlet	Oxidizer	Time	Adsorber Inlet	Out
10.50	ppm C3	ppm C3	ppm C3		ppm C3	ppm C3	ppm C3	-	ppm C3	ppm C
1350		1.06	0.46	1505		1.1	0.7	1615	300.2	1.2
1351		1.07	0.65	1506	287.7	1.1	0.7	1616	299.1	1.2
1352	262.5	1.06	0.6	1507	288.1	1.1	0.7	1617	298.9	1.2
1353	261.5	1.06	0.58	1508	287.7	1.1	0.8	1618	300	1.2
1354	259.5	1.05	0.56	1509	288.7	1.2	0.7	1619	299.5	1.2
1355	254.9	0.97	0.67	1510		1.2	0.9	1620	301.6	1.2
1356	254.9	0.97	0.54	1511	286.6	1.2	0.7	1621	301.1	1.2
1357		1.02	0.5	1512	286.6	1.2	0.9			
1358		1.02	0.5					1622	301.5	1.2
				1513	286.9	1.1	0.7	1623	299.5	1.2
1359		1.0	0.6	1514	284.2	1.1	0.8	1624	299.7	1.3
1400		1.0	0.6	1515	285.3	1.1	0.6	1625	301.6	1.2
1401	251.2	1.0	0.5	1516	286.5	1.1	0.8	1626	298.2	1.3
1402	251.8	1.0	0.5	1517	283.7	1.1	0.6	1627	300.1	1.3
1403	249.6	1.0	0.6	1518	283.4	1.1	0.9	1628	299.8	1.3
1404	249.2	1.0	0.6	1519	284.2	1.1	0.5	1629	298.6	
1405	249.2	1.0	0.6	1520	282.0	1.1				1.3
							0.9	1630	299.8	1.32
1406	249.7	1.0	0.6	1521	279.7	1.1	0.6	1631	300.3	1.33
1407	248.4	1.0	0.6	1522	279.5	1.1	0.7	1632	297.9	1.32
1408	248.6	1.0	0.5	1523	280.3	1.1	0.7	1633	297.5	1.34
1409	246.4	1.0	0.7	1524	277.7	1.1	0.7	1634	296.6	1.29
1410	246.4	1.0	0.6	1525	278.8	1.1	0.6	1635	296.7	1.35
1411	245.5	1.0	0.9	1526	280.2	1.1	0.5	1636	296.2	1.36
1412	244.7	1.0	0.6	1527	277.4	1.1	0.7			
1413								1637	296.8	1.32
	245.4	1.0	0.8	1528	278.8	1.1	0.6	1638	298.2	1.35
1414	246.0	1.0	0.8	1529	279.5	1.1	0.6	1639	297	1.36
1415	243.5	1.1	1.0	1530	277.2	1.1	0.6	1640	295.8	1.33
1416	243.6	1.1	0.8	1531	305.6	1.1	0.7	1641	295	1.3
1417	243.3	1.1	0.9	1532	315.0	1.2	0.5	1642	293	1.3
1418	242.4	1.1	0.8	1533	314.3	1.2	0.7	1643	293.9	
1419	241.7	1.1	1.3	1534						1.33
					312.8	1.2	0.6	1644	293.3	1.31
1420	242.3	1.1	1.1	1535	314.3	1.2	0.6	1645	294.1	1.31
1421	279.9	1.1	0.7	1536	315.7	1.2	0.6	1646	295.3	1.3
1422	278.6	1.1	0.9	1537	312.5	1.2	1.0	1647	296.5	1.37
1423	283.1	1.0	0.7	1538	313.4	1.3	0.5	1648	297.5	1.32
1424	284.4	1.1	1.1	1539	312.2	1.2	0.7	1649	295.6	1.32
1425	276.0	1.1	0.7	1540	311.2	1.2	0.4	1650	296.7	1.27
1426	277.2	1.1	0.7	1541	311.4	1.2	1.0			
1427	275.3	1.1						1651	297	1.32
			0.6	1542	311.5	1.2	0.5	1652	294.4	1.3
1428	275.5	1.1	0.7	1543	309.0	1.2	0.8	1653	296.1	1.3
1429	273.6	1.1	0.4	1544	309.6	1.2	0.4	1654	296.3	1.31
1430	273.5	1.1	0.6	1545	309.5	1.2	0.6	1655	293.3	1.37
1431	271.4	1.0	0.5	1546	311.9	1.3	0.5	1656	293.7	1.37
1432	272.7	1.1	0.6	1547	308.9	1.2	0.6	1657	293.1	1.35
1433	275.3	1.1	0.5	1548	310.8	1.3	0.5	1658	290.8	1.35
1434	275.0	1.1	0.5	1549	317.5	1.2				
	279.7						0.5	1659	290.5	1.38
1435		1.1	0.7	1550	307.8	1.2	0.5	1700	290.8	1.4
1436	280.9	1.1	0.6	1551	308.7	1.2	0.3	1701	291.7	1.36
1437	292.6	1.1	0.6	1552	307.5	1.2	0.5	1702	289.3	1.44
1438	296.1	1.1	0.6	1553	305.5	1.2	0.2	1703	290.2	1.4
1439	298.1	1.1	0.6	1554	307.7	1.2	0.5	1704	291	1.38
1440	297.4	1.1	0.6	1555	307.0	1.2	0.4	1705	290.1	1.41
1441	294.8	1.1	0.7	1556	306.2					
						1.2	0.4	1706	290.2	1.41
1442	293.0	1.1	0.7	1557	306.4	1.2	0.5	1707	289.7	1.39
1443	296.7	1.2	0.6	1558	305.1	1.2	0.5	1708	286.5	1.43
1444	295.5	1.2	0.5	1559	306.7	1.2	0.2	1709	286.5	1.42
1445	294.3	1.1	0.6	1600	304.4	1.2	0.9	1710	286.8	1.45
1446	294.7	1.1	0.6	1601	306.5	1.3	0.1	1711	287	
1447	291.7	1.1	0.5							1.46
				1602	304.5	1.3	3.5	1712	286.2	1.43
1448	291.6 292.2	1.1	0.4	1603	302.4	1.3	0.3	1713	285.9	1.47
1449		1.1	0.6	1604	303.8	1.3	0.4	1714	286.9	1.47



2/26/2009

**AVX** Corporation

05:56 PM

Trend Interval Report : MB2.Adsorber 3 DHEC Report

Selection: MB2.ADS; MB2.ADS; MB2.ADS; MB2.STACK

KeyName:SuffixTrend Definitions UsedPoint\_1:MB2.ADS3.BTPoint COV 5 MinPoint\_2:MB2.ADS3.DPPoint COV 1 MinPoint\_3:MB2.ADS3.MTPoint COV 5 MinPoint 4:MB2.ADS3.TTPoint COV 5 Min

Point\_5: MB2.STACK Trend COV (25.0000) 5 Min

Time Interval: 5 Minutes

Date Range: 2/26/2009 00:00:00 - 2/26/2009 23:59:59

Report Timings: All Hours

<>Date Time	Point_1	Point_2	Point_3	Point_4	Point_5
2/26/2009 13:35:0	00 482.31	3.07	434.62	97.65	1470.96
2/26/2009 13:40:0	00 482.31	3.05	430.38	96.59	1521.82
2/26/2009 13:45:0	00 481.25	3.09	425.09	96.59	1496.39
2/26/2009 13:50:0	00 480.19	3.10	422.97	96.59	1470.96
2/26/2009 13:55:0	00 487.60	3.13	420.85	96.59	1521.82
2/26/2009 14:00:0	00 498.20	3.12	421.91	97.65	1496.39
2/26/2009 14:05:0	00 496.08	3.12	425.09	97.65	1496.39
2/26/2009 14:10:0	00 487.60	3.17	430.38	98.71	1496.39
2/26/2009 14:15:0	00 487.60	3.12	432.50	99.77	1470.96
2/26/2009 14:20:0	00 482.31	3.15	435.68	99.77	1520.76
2/26/2009 14:25:0	00 482.31	3.17	436.74	99.77	1470.96
2/26/2009 14:30:0	00 487.60	3.16	435.68	101.89	1521.82
2/26/2009 14:35:0	00 489.72	3.21	434.62	102.95	1496.39
2/26/2009 14:40:0	00 486.55	3.16	433.56	102.95	1470.96
2/26/2009 14:45:0	00 482.31	3.22	432.50	104.01	1521.82
2/26/2009 14:50:0	00 481.25	3.22	430.38	105.07	1496.39
2/26/2009 14:55:0	00 485.49	3.21	430.38	106.13	1496.39
2/26/2009 15:00:0	00 482.31	3.21	427.20	108.25	1530.30
2/26/2009 15:05:0	00 479.13	3.20	427.20	108.25	1470.96
2/26/2009 15:10:0	00 482.31	3.24	426.15	109.31	1521.82
2/26/2009 15:15:0	00 487.60	3.23	425.09	110.37	1496.39
2/26/2009 15:20:0	00 365.75	3.23	424.03	110.37	1496.39
2/26/2009 15:25:0	00 286.27	3.25	421.91	111.43	1534.54
2/26/2009 15:30:0	00 286.27	3.23	420.85	111.43	1470.96
2/26/2009 15:35:0	00 280.97	3.26	420.85	111.43	1521.82
2/26/2009 15:40:0	00 275.67	3.23	420.85	111.43	1496.39
2/26/2009 15:45:0	00 259.78	3.21	421.91	111.43	1521.82
2/26/2009 15:50:0	00 265.08	3.25	422.97	113.55	1531.36
2/26/2009 15:55:0	00 265.08	3.22	422.97	113.55	1470.96
2/26/2009 16:00:0	00 265.08	3.21	424.03	113.55	1521.82
2/26/2009 16:05:0	00 259.78	3.21	425.09	134.74	1534.54
2/26/2009 16:10:0	00 250.24	3.22	422.97	177.13	1470.96
2/26/2009 16:15:0	00 271.44	3.23	418.73	211.04	1521.82

2/26/2009 16:20:00	266.14	3.26	414.49	237.53	1496.39			
2/26/2009 16:25:00	269.32	3.24	412.37	256.60	1496.39			
2/26/2009 16:30:00	274.62	3.26	411.31	267.20	1530.30			
2/26/2009 16:35:00	258.72	3.24	409.19	272.50	1470.96			
2/26/2009 16:40:00	269.32	3.24	408.13	272.50	1521.82			
2/26/2009 16:45:00	253.42	3.24	408.13	273.56	1496.39			
2/26/2009 16:50:00	264.02	3.26	408.13	273.56	1470.96			
2/26/2009 16:55:00	269.32	3.26	410.25	272.50	1521.82			
2/26/2009 17:00:00	264.02	3.27	410.25	272.50	1496.39			
2/26/2009 17:05:00	264.02	3.26	412.37	270.38	1496.39			
2/26/2009 17:10:00	258.72	3.25	414.49	268.26	1521.82			
2/26/2009 17:15:00	257.66	3.28	419.79	265.08	1496.39			
2/26/2009 17:20:00	258.72	3.29	419.79	261.90	1470.96			
2/26/2009 17:25:00	258.72	3.24	418.73	259.78	1521.82			
2/26/2009 17:30:00	253.42	3.26	415.55	258.72	1496.39			
2/26/2009 17:35:00	253.42	3.27	409.19	260.84	1470.96			
2/26/2009 17:40:00	255.54	3.27	403.89	261.90	1521.82			
2/26/2009 17:45:00	255.54	3.26	398.59	264.02	1496.39			
2/26/2009 17:50:00	255.54	3.28	388.00	261.90	1479.44			
**************************************								

- 5 -

Key Trend Definitions Used Name:Suffix Point\_1: MB2.CMAP.JHMAP.FITrend COV (100.0000) 1 Min Time Interv 5 Minutes

Date Rang 2/26/2009 00:00:00 - 2/26/2009 23:59:59 Report Tim All Hours

<>Date	Time	Point_1
2/26/2009	13:30:00	4978
2/26/2009	13:35:00	5007
2/26/2009	13:40:00	5012
2/26/2009	13:45:00	4847
2/26/2009	13:50:00	5022
2/26/2009	13:55:00	5007
2/26/2009	14:00:00	5011
2/26/2009	14:05:00	4784
2/26/2009	14:10:00	5017
2/26/2009	14:15:00	4971
2/26/2009	14:20:00	5042
2/26/2009	14:25:00	4967
2/26/2009	14:30:00	5004
2/26/2009	14:35:00	5002
2/26/2009	14:40:00	4990
2/26/2009	14:45:00	4777
2/26/2009	14:50:00	4974
2/26/2009	14:55:00	4790
2/26/2009	15:00:00	4988
2/26/2009	15:05:00	4978
2/26/2009	15:10:00	4973
2/26/2009	15:15:00	4965
2/26/2009	15:20:00	5005
2/26/2009	15:25:00	4985
2/26/2009	15:30:00	5000
2/26/2009	15:35:00	4772
2/26/2009	15:40:00	4979
2/26/2009	15:45:00	4974
2/26/2009	15:50:00	4970
2/26/2009	15:55:00	4808
2/26/2009	16:00:00	4980
2/26/2009	16:05:00	4970
2/26/2009	16:10:00	4971
2/26/2009	16:15:00	4997
2/26/2009	16:20:00	4781
2/26/2009	16:25:00	4781
2/26/2009	16:30:00	4959
2/26/2009	16:35:00	4923
2/26/2009	16:40:00	4961
2/26/2009	16:45:00	4978
2/26/2009	16:50:00	4776
2/26/2009	16:55:00	4982
2/26/2009	17:00:00	4774
2/26/2009	17:05:00	4996
2/26/2009	17:05:00	4781
212012009	17.10.00	4/01

2/26/2009	17:15:00	4960	
2/26/2009	17:20:00	4972	
2/26/2009	17:25:00	4984	
2/26/2009	17:30:00	4955	
2/26/2009	17:35:00	4776	
2/26/2009	17:40:00	5009	
2/26/2009	17:45:00	5007	
2/26/2009	17:50:00	4982	
******	******	***** End of Rep	ort ************************************

AVX Application Rate

Binks Tank Wt.	(lb)	Time!	Time	Data	A ctual Time
Initial	250.8	Final	Time	Rate (lb/hr)	Actual Time
	200.0	250	2:00:00	(10/111)	
		248.8	5:20:00		
		246.8			13:50 Start Run 1
		245.4			
		243.4 241.4			
		241.4			
		235.6			
		232.4			14:41
		229.6			
		227.2	70:00:00		14:55
				21.21	
	221				
	221	218.8	6:15:00		
		216.6	12:30:00		15:05 Start Run 2
		213.4	21:45:00		
		210	30:40:00		
		206.2 200.8	40:30:00 54:30:00		
		198.8	60:00:00		16:05
		100.0	00.00.00	22.2	10.00
	195.4				
		193	6:20:00		16:15 Start Run 3
		190.2	13:50:00		
		187.4 184.2	21:18:00 30:00:00		
		180.6	39:40:00		
		177.4			
		173.2	60:00:00		17:15
				22.2	

1004226 regulator1



AIR MONITORING, INC.

P.O. Box 559 • Huntersville, NC 28070-0559 www.integrityair.net

# STATIONARY SOURCE SAMPLING REPORT

FOR

AVX CORPORATION

MYRTLE BEACH, SOUTH CAROLINA

Burnout Oven Exhaust and Metals Exhaust **VOC Sampling** 

Integrity Project No. 09-043

Performed: June 25, 2009

Certified By:

James A. Lewis, QSTI Vice President Intgerity Air Monitoring, Inc. J.A. Tony Blanton, QSTI

President

Integrity Air Monitoring, Inc.

# TABLE OF CONTENTS

1.0	INTROI	DUCTION	3
	1.1	Purpose	
	1.2	Outline of Test Program	
	1.3	Test Participants	
		Table 1 – Test Participants	
2.0	DECIL		
4.0			
	2.1	Summary of Results	
	2.2	Table 2 – Summary of THC Sampling Results	
	2.2	Discussion	5
3.0	PROCES	SS DESCRIPTION	6
	3.1	Air Pollution Control Equipment	6
	3.2	Demonstration of Operating Rate	6
		Figure 1 – Burnout Oven GB 201 Temperature Profile	8
4.0	SAMPLI	NG METHODS	9
	4.1	Sampling Strategy	
	4.2	Sampling and Analytical Procedures	
		Table 4 - Sampling and Analytical Procedures	
		4.2.1 Sampling Ports, Traverse Points and Cyclonic Flow	
		Determination	9
		4.2.2 Stack Gas Velocity and Volumetric Flow Rate Determination	
		4.2.3 Dry Molecular Weight Determination	
		4.2.4 Moisture Determination	
		4.2.5 THC Analyzer Procedures	
		4.2.6 Sampling Ports and Points	
		Figure 2 – Burnout Oven Exhaust and Location of Sampling Ports	
		Figure 3 – Metals Exhaust and Location of Sampling Ports	
	4.3	Quality Assurance and Quality Control	
		Table 5 – Project QA Activities and Results	
5.0	APPEND	ICES	16
J.0	1.	Detailed Summary of Results and Example Calculations	.10
	2.	Field Data Sheets and System Drift Checks	
	3.	Data Acquisition System Values	
	3. 4.	Calibration Data and Protocol Gas Certificates of Analysis	
	4. 5.	,	
	٥.	Facility Production Documentation	

## 1.0 INTRODUCTION

This test program was performed at the AVX Corporation facility in Myrtle Beach, South Carolina on one Burnout Oven exhaust (Unit ID 12 - MB2 Kiln Room) and the Metals Department exhaust (Unit ID -01 Metals Department). This section of the report describes the test purpose and provides a brief outline of the test activities and the personnel involved in the test program.

# 1.1 Purpose

The AVX Corporation facility is covered by Title V Air Quality Permit No. TV-1340-0002; however, the testing was performed at the request of SC DHEC.

# 1.2 Outline of Test Program

Integrity Air Monitoring, Inc. (Integrity) performed stationary source sampling at one Burnout Oven exhaust (during two separate operating scenarios) and at the Metals Department exhaust on June 25, 2009. The sampling included six 30-minute sampling runs at the Burnout Oven exhaust and three 30-minute sampling runs at the Metals Department exhaust for total hydrocarbon (THC) emissions as carbon using EPA Reference Method 25A. In addition to the sampling performed for THC, Integrity also performed US EPA Reference Methods 1 through 4 to determine the location of the sampling points, the volumetric flow rate, the molecular weight of the stack gas and the moisture content, respectively.

The original scope of the project included only three sampling runs at the burnout oven exhaust; however, SC DHEC representatives present to witness the testing requested three additional sampling runs at the burnout oven exhaust during a later phase of the burnout cycle (higher temperature).

# 1.3 Test Participants

The following table provides contact information for the test participants.

Table 1 – Test Participants			
Name	Title	Affiliation	Contact Info
J.A. "Tony" Blanton	President	Integrity Air Monitoring, Inc.	Telephone: (704) 398-1119 Facsimile: (704) 398-1113 tony@integrityair.net
James A. Lewis	Vice President	Integrity Air Monitoring, Inc.	Telephone: (704) 398-1119 Facsimile: (704) 398-1113 jim@integrityair.net
Boyd Holt	Safety & Environmental Manager	AVX Corporation	Telephone: (843) 946-0377 Facsimile: (843) 444-2833 bholt@avxus.com
Gary Yoder	President	Resolute Environmental, LLC	Telephone: (919) 701-0009 gyoder@nc.rr.com
Nathan T. Wagner	Environmental Health Manager	SC DHEC	Telephone: (803) 898-4054 Facsimile: (803) 898-4117 wagnert@dhec.gov
Mallory S. Sparks	Environmental Health Manager	SC DHEC	Telephone: (803) 898-4335 Facsimile: (803) 8984117- sparksmslj@dhec.sc.gov

### 2.0 RESULTS

This section presents the mean sampling results. Detailed sampling results for each sampling run and example calculations are presented in Appendix 1. Field data sheets and system bias and drift checks are presented in Appendix 2. Data acquisition system uncorrected values and values corrected for system bias are presented in Appendix 3.

# 2.1 Summary of Results

The following tables present the mean results from the sampling performed at the Burnout Oven exhaust and the Metals Department exhaust on June 25, 2009.

Table 2 – Su	ults	
Source	Concentration, ppmvd as carbon	Loading/Emission Rate, lbs/hr as carbon
Burnout Oven Exhaust (Condition 1)	21.6	0.0010
Burnout Oven Exhaust (Condition 2)	381.2	0.014
Metals Exhaust	17.2	0.036

# 2.2 Discussion

The results of the test indicate that both electrode ink processing and burnout have low THC emissions. These test results will be used to develop emission factors used in future emission inventories and air permit applications for the AVX Myrtle Beach facility.

## 3.0 PROCESS DESCRIPTION

Total hydrocarbon emissions from both electrode ink processing and burnout are from the organic (carbon) materials terpineol and ethyl cellulose. Both materials are part of the electrode ink mixture. Terpineol is manufactured from terpintine with other uses in the manufacturing of fragrances, disinfectants, polishes, and household products. It is a heavy liquid with a flash point of 100°C (212°F) and is added to the ink for its solvent properties. Ethyl cellulose is a dry material added to the electrode ink for its binding properties potentially producing hydrocarbon emissions during the burnout process.

The Metals Department prepares conductive metal inks (electrode inks) and pastes (termination pastes) used with ceramic slip to manufacturer capacitors in the build-up process. The electrode ink is primarily made up of metals (nickel, copper, gold, etc.), dry binder (ethyl cellulose), and terpineol. The mixture is added to milling tools where it may go through several passes depending on the desired particle size specification. Emissions are vented out a room exhaust.

The burnout ovens are located in the MB2 Kiln Room. Green chips enter the burnout ovens where they go through varying temperature profiles to remove the terpineol and ethyl cellulose in the capacitor chips. The temperature profile and cycle time for this test ranged from room temperature to 500°F for 25 hours. This is the most common profile and cycle time used by AVX. Temperature profiles and cycle times can range from room temperature to 550°F for up to 32 hours. The temperature profiles are necessary to remove the binder and terpineol while maintaining the structural integrity of the chips.

# 3.1 Air Pollution Control Equipment

Emissions from the burnout ovens and Metals Department are vented uncontrolled to the atmosphere.

# 3.2 Demonstration of Operating Rate

As communicated to SC DHEC during the development of the testing protocol, testing at the Metals Department could only measure emissions from the electrode ink processed the day of the test. The difference in electrode inks mixtures is primarily the type of metals used (nickel, copper, gold, platinum, etc.). The organic materials (terpineol and ethyl cellulose) do not vary much between the mixtures. During this test, AVX prepared a nickel ink, which is the most common ink used in chip production at the facility. After the mixture is prepared, it goes through a series of passes in the department milling tools. The tested ink mixture contained 44% by weight terpineol, 2.3% ethyl cellulose, 53.7% nonorganic solids and went through three milling passes in the largest of 3 tools.

The burnout oven tested was GB 201. It contained 19 pans holding 1,010,960 Style 036 capacitor chips. As shown in the temperature profile in Figure 1, Test 1 was conducted from 8:30 to 9:38. During Test 1, The SC DHEC requested a second test at the oven's peak temperature, which was conducted from 15:00 to 16:08. The test results show a higher organic emission rate of 0.014 lb/hr at the Test 2 peak temperature. The oven was not completely charged and can hold up to 30 pans. Assuming a linear relationship, the oven charged with 30 pans would result in an organic emission rate of 0.022 lb/hr.

Production documentation corresponding with the sampling is included in Appendix 5.

# Burnout Oven GB 201 Temperature Profile

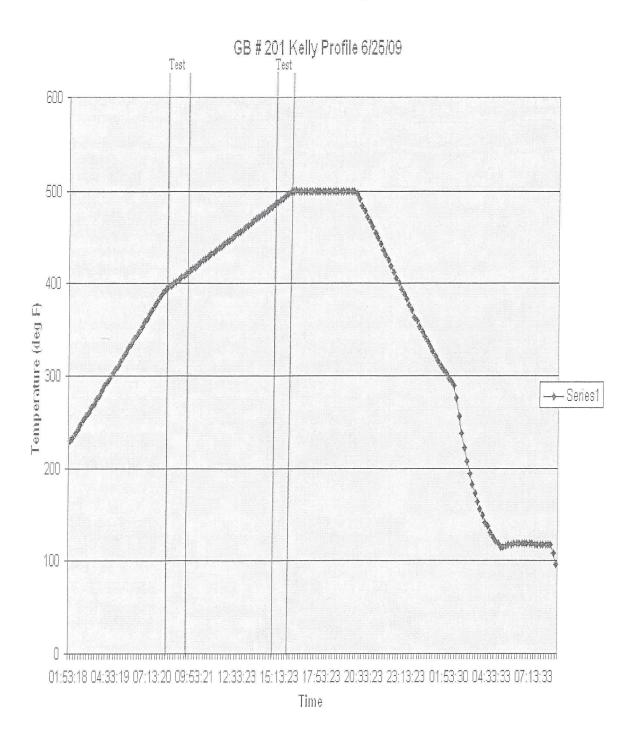


Figure 1

#### 4.0 SAMPLING METHODS

This section describes the sampling strategy, sampling and analytical methods, and the quality assurance/quality control procedures implemented during this project.

#### 4.1 Sampling Strategy

The sampling and analytical procedures used during this test program were those established by the US EPA and SC DHEC. A Site-Specific Test Plan (SSTP) was submitted to the SC DHEC detailing the sampling procedures and process parameters to be followed during this test program.

#### 4.2 Sampling and Analytical Procedures

The following table provides the US EPA reference methods used in this sampling program.

Table 4 – Sampling and Analytical Procedures					
Reference Method	Parameter				
1	Location of Sampling Points				
2	Volumetric Flow Rate				
3	Molecular Weight				
4	Moisture Content				
25A	THC				

A sampling and analysis synopsis for each of these methods is discussed briefly in the following subsections. These test methods are available in the Code of Federal Regulations Volume 40, Part 60 or by request from Integrity.

#### 4.2.1 Sampling Ports, Traverse Points and Cyclonic Flow Determination

The sampling locations were prepared according to the criteria in Method 1. The duct diameters upstream and downstream from the sampling ports were measured and documented prior to sampling. The number of traverse points was chosen with respect to sampling port location. The amount of cyclonic flow was determined according to the criteria detailed in Method 1.

#### 4.2.2 Stack Gas Velocity and Volumetric Flow Rate Determination

Method 2 is used to determine the average gas velocity in a stack using the average temperature and average velocity head. The temperature is measured with a calibrated thermocouple and the velocity determined with a Type S (Stausscheibe) pitot tube. This method is further used to calculate to volumetric flow rate.

Measurements of velocity head and temperature at the sampling location were performed at the traverse points specified by Method 1. An inclined oil manometer or calibrated magnehelic gauge was used to measure the differential pressure.

The apparatus was set-up according to manufacturer and reference method recommendations. Pre-test and post-test leak checks were conducted for each sampling run. The atmospheric and static pressure of the stack was also determined for each set of velocity head readings. The volumetric flow rate calculations used were those specified in Method 2.

#### 4.2.3 Dry Molecular Weight Determination

Method 3 is applicable for determining carbon dioxide and oxygen concentrations and dry molecular weight of a sample from a gas stream of a fossil-fuel combustion process. This method may also be applicable to other processes where it has been determined that compounds other than carbon dioxide, oxygen, carbon monoxide, and nitrogen are not present in concentrations sufficient to affect the results.

Since the sources were emitting essentially air, a dry molecular weight of 29.0 was used according to Method 2, Section 8.6.

#### 4.2.4 Moisture Determination

Method 4 was used to determine the stack gas moisture content. The moisture content is used to correct the concentration or mass emission rate to a dry basis. Moisture determinations for this sampling project were determined using one of two methods described below dependant on the sample stream temperature. Sources above 140 degrees F require the use of a Method 4 sample train.

The flue gas moisture content at the Metals Department exhaust (< 140 °) was determined using wet bulb/dry bulb thermometers and partial pressure, vapor and saturated vapor pressure equations. This technique is described in Method 4 and is summarized below:

- Moisten the wet bulb thermometer wick with deionized water;
- Insert both thermometers into the flue gas stream and monitor the wet bulb temperature;

When the wet bulb temperature has stabilized, record both the wet bulb and dry bulb thermometer temperatures.

The flue gas moisture content (PMV) was then calculated using saturated vapor and moisture equations.

The moisture content at the burnout oven exhaust (>140 °F) was performed using the following sampling system and procedures:

- A heated  $(248^{\circ}\text{F} \pm 25^{\circ}\text{F})$  probe;
- A moisture condensing train consisting of four sequential impingers. Impingers one and two
  contained 100 ml each of deionized water followed by an empty impinger and a final impinger
  containing 200 grams of silica gel; and
- A Method 5 type metering system capable of maintaining a constant sampling rate.

At the end of the test run, the liquid in the first three impingers was measured to the nearest milliliter. The moisture collected by the silica gel was determined to the nearest 0.1 gram. These measurements were recorded on the Method 4 data form. The moisture content of the emission source was calculated according to the equations in Method 4, Section 12. At the direction of SC DHEC, since the process is steady state, only one moisture sample was conducted and the moisture result was used for all runs.

#### 4.2.5 THC Analyzer Procedures

Total gaseous organics or total hydrocarbons concentrations and emission rates were determined according to EPA Method 25A. Method 25A applies to the measurement of total gaseous organic concentration of vapors consisting primarily of alkanes, alkenes, and/or arenes (aromatic hydrocarbons). The concentration is expressed in terms of propane (or other appropriate calibration gas) or in terms of carbon.

Sampling for total gaseous organics was performed using a VIG Industries Model 20 analyzer. The principal components of each sampling systems were sequentially:

- A heated stainless steel sample probe;
- A heated system calibration assembly and filter;
- A heated sample line;
- An FIA analyzer;
- Calibration gases; and
- A data acquisition system that continuously logs 1-minute concentrations.

Prior to the test series, the heated sample lines were heated to 360°F and the hydrocarbon analyzer was heated above 200°C to prevent condensation. After temperatures were stabilized the hydrocarbon analyzer was ignited using a 40% hydrogen balance helium fuel and hydrocarbon free air. Calibration procedures commenced with the introduction of zero and high-level calibration gas into the sampling system. The necessary adjustments were made and the responses for low-level and mid-level gases were recorded. The predicted values for the calibration gases and the actual responses were recorded on the field data sheet and by the data acquisition system. High-level and zero gas concentrations were introduced into the measurement system and the response time was recorded on the field data sheet. Sampling was initiated immediately following instrument calibration. At the conclusion of the first hour, the zero and mid-level calibration gases were reintroduced and their respective responses recorded on the field data sheet. Integrity utilized a STEC 710-C gas divider according to Method 205 to create multi-level calibration gases from a single upscale standard. A certificate of calibration for the gas divider is provided in Appendix 5.

The zero and calibration drift checks were performed immediately following completion of the test run and at the conclusion of the test program. The data collected during the test program was archived on a data acquisition system and is attached to this test report as Appendix 3. The DAS used by Integrity Air Monitoring, Inc. for this project was an IBM computer with hard disk storage and a Superlogics data shuttle recorder.

#### 4.2.6 Sampling Ports and Points

The dimensions of the sampling locations and the location of the sampling ports and points are detailed in Figures 2 and 3. The drawings provided are not to scale. The THC sampling was performed at single point near the center of each stack.

# Burnout Oven Exhaust

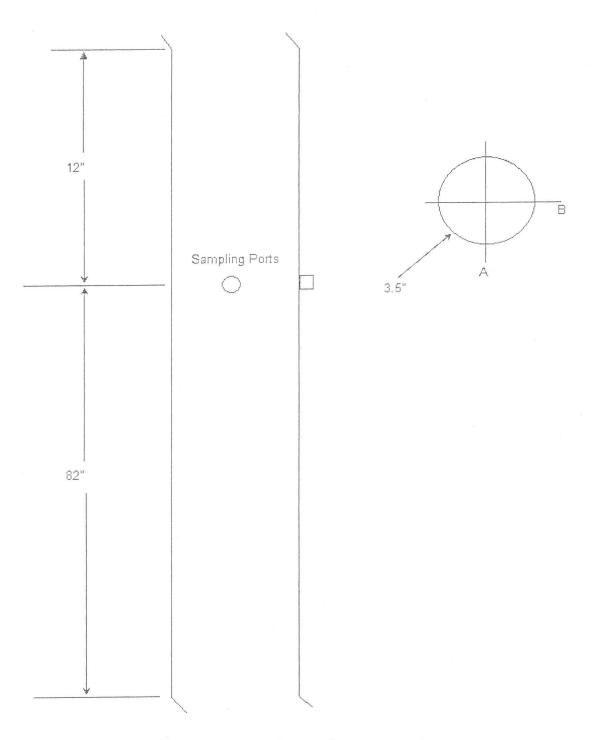


Figure 2

**Location of Sampling Ports** 

### Metals Exhaust

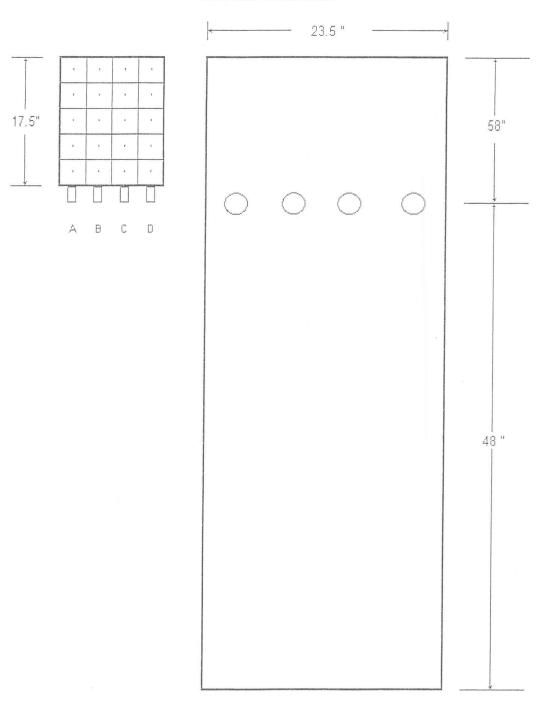


Figure 3

# **Location of Sampling Ports**

#### 4.3 Quality Assurance and Quality Control

Integrity Air has established quality assurance and quality control (QA/QC) guidelines to ensure the highest quality sampling and analytical data from source tests.

Data quality objectives were maintained throughout this project. The following table provides the QA activities followed during this sampling project and the results.

Table 5 – Project QA Activities and Results						
Parameter	Criteria	Within Limits?				
Sampling Train Leak Check	< 0.02 cfm	yes				
Pitot Tube Leak Check	< 0.1 in. H <sub>2</sub> O in 15 sec.	yes				
Console Calibration	γ +/- 0.02	yes				
Thermocouples	+/- 2% of ref. temp.	yes				
25A Analyzer Calibration	+/- 5% of gas	yes				
25A Drift Check	+/- 3% of span	yes				

Quality control procedures for the gaseous pollutant sampling has included the use of EPA Protocol I calibration gases. Protocol gas certificates of analysis are included in Appendix 4. US EPA Approved Alternate Method ALT-009 was used for the console post-test calibration and can be found in Appendix 1. The pre-test and post-test thermocouple system calibrations were performed using the procedures found in US EPA Approved Alternate Method ALT-011 and can be found in Appendix 4.

Field data and final laboratory results were independently audited and reviewed for verification of data. The Emission Test Report is audited for completeness and reasonableness of data. The report requires the signature of the project manager and Vice President or President before release to the client. Data and final reports are archived in a secured area for a minimum period of three years.

Integrity's field and laboratory test equipment has been maintained and calibrated in accordance with quality assurance procedures established by the US EPA in the Quality Assurance Handbook for Air Pollution Measurement Systems: Volume III. Equipment calibrations including pre-test and post-test calibration data are presented in Appendix 4.

Adsorber/Desorber and Thermal Oxidizer

#### MONITORING PLAN FOR REECO FLUISORB SYSTEM

This plan is prepared to comply with Section II.C. of Construction Permit number 1340-0002-CK issued August 11, 1998, for the Chip Manufacturing Automated Process (CMAP) machines at AVX Corporation in Myrtle Beach, South Carolina. The monitoring and recordkeeping requirements in this plan include the monitoring parameters, calibration, and inspection schedules.

Listed below are a description of the control device, AVX's proposed alternative monitoring method, and monitoring procedures and inspection schedule.

#### CONTROL DEVICE DESCRIPTION

AVX uses a Reeco FluiSorb system (a combination of an adsorber, desorber, and thermal oxidizer) to reduce the emissions of volatile organic compounds (VOC) into the atmosphere. The device controls emissions from the CMAP machines in the NMF. The air first passes through the adsorption vessel. The high surface area of the carbonaceous media removes the majority of the VOC, leaving a cleaned exhaust gas. Organics collected on the porous media are removed via steam in the desorption unit, creating a concentrated VOC air stream. This air stream is then sent to a thermal oxidizer. Because the first stage of adsorption significantly decreases the flowrate needing treatment by the thermal oxidizer, the size of the thermal oxidizer is greatly reduced. Upon entering the thermal oxidizer, the air stream is combusted with auxiliary fuel, such as natural gas, to convert VOC into carbon dioxide and water vapor.

A copy of the FluiSorb vendor brochure is included with this Monitoring Plan.

#### ALTERNATIVE MONITORING METHOD

Construction Permit number 1340-0002-CK lists monitoring parameters for the adsorber/desorber unit and for the thermal oxidizer. The permit also includes clauses for alternative monitoring methods, as follows:

Any alternative method for monitoring scrubber performance must be approved by the Bureau and shall be incorporated into a Monitoring Plan...

Any alternative method for monitoring afterburner performance must be approved by the Bureau and may be incorporated into a Monitoring Plan...

Although the specific condition refers to a scrubber (a scrubber is not a part of the CMAP control equipment), a more appropriate monitoring condition is proposed for the adsorber/desorber unit. This monitoring condition involves a monitoring of pressure drop across the adsorber inlet/outlet and a monitoring of the desorber temperature.

#### MONITORING PROCEDURES

To ensure the control device is operating properly and efficiently, AVX will follow the monitoring and recordkeeping procedures below.

#### Adsorber/Desorber Unit

The pressure drop across the adsorber inlet/outlet and the desorber temperature will be monitored. Measuring the pressure drop across the adsorber is an excellent means of determining whether the unit is operating correctly. Any pressure drop increases above the desired range would indicate the unit is not operating at peak efficiency. The pressure drop will be recorded continuously on a data logger while the adsorber/desorber unit is operating.

Monitoring the desorber temperature ensures that the maximum amount of VOC is desorbed from the carbon media; significant decreases in desorber temperature would result in a decrease in the amount of organics removed from the carbonaceous material. Temperature measurements will be recorded continuously on a data logger while the adsorber/desorber unit is operating.

Pressure drop and temperature readings will be relayed from the data logger to a display. Records containing these readings will be maintained in a form suitable for inspection for five (5) years from the date the information is recorded.

#### Thermal Oxidizer

To monitor the destruction of VOC at the thermal oxidizer, the combustion temperature will be recorded on a data logger. Because the unit relies on combustion at a specific range of temperatures, monitoring this parameter ensures the control of VOC. A thermocouple located near the combustion chamber will measure the temperature and relay this information to a display. Temperature measurements will be recorded when the oxidizer is treating exhaust from the adsorption/desorption unit. When the adsorption/desorption unit is not operating, the thermal oxidizer is shut down, and the combustion temperature is not recorded. Records containing the temperature readings will be maintained in a form suitable for inspection for five (5) years from the date the information is recorded.

Table 1 summarizes the monitoring methods AVX will employ to ensure compliance with Construction Permit number 1340-0002-CK.

TABLE 1. MONITORING PLAN SUMMARY.

Unit	Monitoring Method	Range	Duration	Frequency	Recordkeeping	Record Kept in Form Suitable for Inspection
Adsorption Unit	Pressure drop	2"w.c 5" w.c.	Continuous	Continuous	Electronic records	5 years
Desorption Unit	Thermocouple at heat source	400°F – 500°F	Continuous	Continuous	Electronic records	5 years
Thermal Oxidizer	Thermocouple at combustion chamber	1400°F- 1800°F	Continuous	When adsorption/ desorption unit is operating	Electronic records	5 years

#### INSPECTION AND MALFUNCTION SCHEDULE

The adsorber/desorber system and the thermal oxidizer will be inspected quarterly. Preventive maintenance will be completed quarterly, per vendor specifications. If the monitoring parameters reveal a departure from the proposed ranges, then the unit in question (i.e., the adsorber/desorber or the oxidizer) will be inspected. If the parameters continue to show consecutive readings outside the ranges for more than a 24-hour period following the initial observation, then the unit will be shut down, the problem corrected, and startup will resume once the unit can be operated within the acceptable ranges. In instances where a shutdown of the unit results in a significant production interruption, AVX will request prior approval from the DHEC to continue to operate the CMAP machines.

# FluiSorb

Fluidized Bed Concentrator





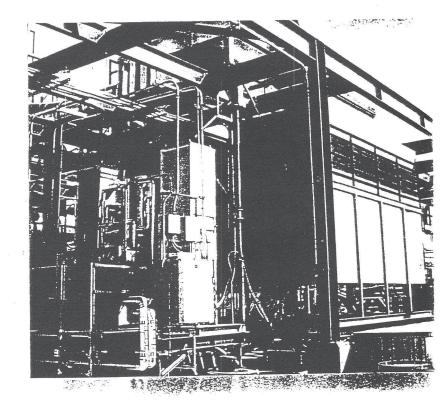
Superior Concentration of VOCs and Air Toxics

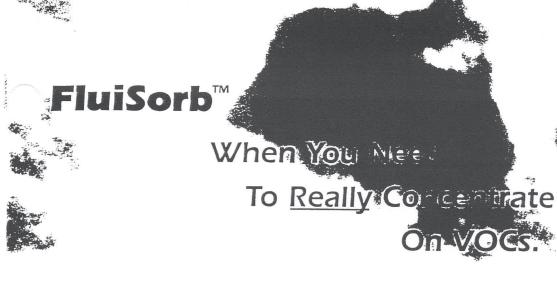
Concentrations of 1000:1 or Greater

Exceptionally Low Operating Costs

Destruction/Recovery Rates of 95%-99%







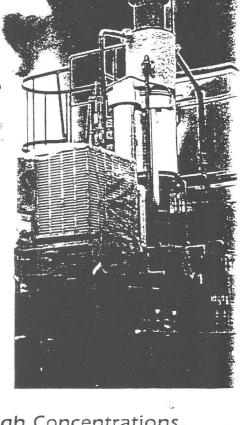
With the ability to achieve VOC concentration ratios of 1000:1 to as high as 10,000:1, REECO's FluiSorb™ fluidized bed adsorber/desorber concentrator offers the highest turndown ratio of any VOC concentrator available. No other system even comes close. (Gas volume reduction ratios in other concentrators are normally in the range of just 10:1.)

The FluiSorb system's high turndown ratios translate into even more important numbers for you: exceptional and contact the system of the syste

Using a synthetic beaded carbonaceous adsorbent media, FluiSorb treats industrial process exhaust streams containing volatile organic compounds and toxic air emissions. This proven system takes high volume gas streams with low concentrations of VOCs and increases VOC concentration before destruction through oxidation or solvent recovery.

Hundreds of systems are operating throughout the world in such applications as:

- Semiconductor manufacturing
- Painting/finishing
- Printing/converting
- Solvent recovery applications
- Chemical processing
- Soil remediation



# High Concentrations. Low Costs.

With the FluiSorb's ability to highly concentrate VOC-laden streams, "Back-End" systems such as afterburners and thermal oxidizers for destruction, and cooler/condensers for solvent recovery, are smaller and less costly than those required by other concentrator systems. The result is higher performance and lower capital and operating costs.

FluiSorb systems can handle exhaust streams ranging from 200 cfm to over 500,000 cfm. Destruction or recovery efficiencies of 95% is 100% are readily achievable providing proven regulatory compliance and effective product recovery performance.





#### Semiconductor Manufacturing

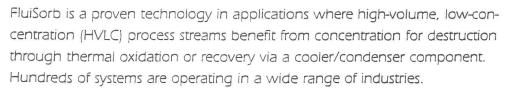
FluiSorb systems are operating in semiconductor manufacturing facilities throughout the world, and with up-time reliability critical for the "around-the-clock" operations typical in this industry, FluiSorb is the technology of choice. In addition to high turndown ratios for better solvent recovery and reuse, the fluid bed technology virtually eliminates pressure swings, keeping sensitive process conditions unaffected by its operation. FluiSorb also is unaffected by HMDS, which can cause problems in alternative technologies.

## Painting/Finishing

Painting and surface finishing operations in the automotive, aerospace, auto parts, shipbuilding, and furniture manufacturing industries require a low-cost solution to their air pollution control and product recovery requirements. With its proven ability to handle HVLC gas streams, FluiSorb is ideally suited to these applications. Depending on the level of particulate present, REECO can supply a pre-filter to handle organic or inorganic particulate upstream of the FluiSorb system.

# Demonstrated Experience

# In A Wide Range of Industries





## Printing/Converting

Characterized by higher VOC levels than those found in many other processes, industries such as coating, laminating, and printing can benefit from FluiSorb's high volume reduction ratios. FluiSorb can concentrate these gas streams to stay under the 25% Lower Explosive Limit (LEL) required for economical operation with an oxidizer. Solvent recovery of a more concentrated stream through a cooler/condenser stage can be effective if the solvents can be recycled back into the process.

industry. FluiSorb is flexible enough to handle both continuous or batch processing. With its extremely high VOC reduction ratios, the FluiSorb system can extend and operating costs by recovering valuable solvents.



## Chemical Processing

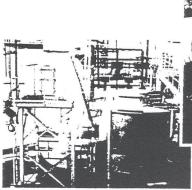
FluiSorb has proved to be an exceptional technology for the wide ranging process conditions found in the chemical processing

#### Soil Remediation/ Groundwater Air Stripping

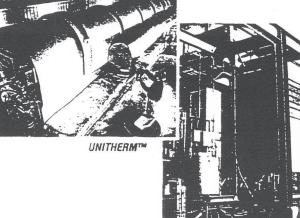
Process flexibility is a necessity in soil remediation and ground-water air stripping applications, which typically encounter low concentrations of a wide variety of air toxics, including halogenated VOCs. High humidation are also typical, and transport hydrophobic nature of the Fluisor carbon adsorption media, allows it to operate in high humidity situations. Fluisorb has the flexibility to adapt to wide swings in process conditions.

# REECO

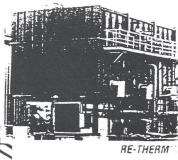
# Over Two Decades of Leadership in VOC and Air Toxics Control

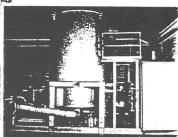


Rotary Bed Protector™ (Particulate Control)



FluiSorb™ Concentrator





RE-THERM

REECO was the first to develop regenerative thermal oxidizers for air pollution control. After nearly a quarter century, we continue to be the industry pacesetter, offering concentrator systems and regenerative, recuperative, and catalytic oxidizers to suit specific industry applications, process conditions, and budget considerations for air pollution control and product recovery.

More than 250 highly-efficient RE-THERM systems have been installed in industries such as:

- Semiconductor manufacturing
- Printing/converting
- Spray painting
- Metal decorating
- Wood products
- Chemical processingSoil and water remediation
- Coating
- Laminating
- Coil coating
- Food/pharmaceutical manufacturing
- Odor control applications

Our full range of capabilities include: applications engineering, engineering studies, full system design/installation, process

modifications, construction/ construction management, start-up services, inspections, service & maintenance, parts, and training.

REECO benefits from its partnering agreement with Environmental C&C, Inc. (EC&C). FluiSorb was developed by EC&C as an improvement over existing technologies in solvent recovery. EC&C has been involved with environmental testing and the development of air pollution control systems for more than 15 years. The company has developed novel VOC control and solvent recovery systems as well as innovative VOC concentrator technologies.



A Research-Cottrell Company Route 22 West Branchburg, NJ 08876 (908) 685-4000 Fax: (908) 685-4181



Solvent Recovery is VOC Abatement Systems



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