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C. Earl Hunter, Commissioner
Promoting and protecting the health of the public and the environment

February 24, 2009

Mr. Jack Huggins
AVX Corporation
P.O. Box 867
Myrtle Beach, SC 29578-0867

RE: Adsorber/Desorber and Thermal Oxidizer Test Plan Submitted Electronically on February 23, 2009

Dear Mr. Huggins:

To adequately assess current facility-wide VOC and organic HAP emissions, the Department is requesting that, in addition to conducting source tests on the MB2 Adsorber/Desorber and Thermal Oxidizer, AVX conduct source tests on the Slip Manufacturing Building, Metals Department, MB2 Capacitor Burn-out Ovens, and MB2 Clean Firing Kilns. These additional sources were discussed during a site visit on February 3, 2009. A test plan for the additional sources will have to be submitted and approved prior to testing these additional sources. Please submit a separate test plan for these sources by March 6, 2009.

The site-specific test plan for the Adsorber/Desorber and Thermal Oxidizer is approved by the Department and testing for these sources can begin on Thursday, February 26, 2009. Any deviations from the plan, without prior approval from the Department, may be cause for rejecting the test results. This approval is contingent upon the following:

1) The Department will monitor the spiking process during the test and if there is any indication of leaks or other problems that would bias the results, then the test results will not be accepted.

2) A gravimetric determination of the spike amount is acceptable provided the digital scale has been calibrated within the past two months; if not, the scale must be calibrated within a month of the test with the results of all calibrations submitted with the final test report.

3) The proposed method to introduce the spike solvents may not vaporize all of the solvents. It is very important that the adsorber/desorber and thermal oxidizer are challenged with the maximum VOC and organic HAP loading. If the adsorber inlet carbon values reported by Method 25A are not consistent with the gravimetrically determined spike rates, the test results may be rejected.

4) After the testing, the maximum number of build-up machines that can be vented to an adsorber/desorber set will be limited to the number demonstrated during the tests. This number will be based on the equivalent number calculated from actual spiking rates and a design capacity of 70kg slip per day per machine. Additional machines may be added, with Department approval, provided new test data or engineering calculations demonstrate the additional loading will not affect the efficiency of the adsorber/desorbers.

Upon completion of all testing/screening events, a new algorithm for use in facility wide semi-annual and emission inventory reports and permit applications using the test data and any additional relevant information will have to be developed, submitted, and approved.

If you have questions or need further assistance in this matter, please contact Jake Frick at (803) 898-3897 or by e-mail at fricklj@dhec.sc.gov.

Sincerely,

Rhonda B. Thompson, P.E.
Assistant Bureau Chief
Bureau of Air Quality

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cc: Compliance File: 1340-0002