

**AVX CORPORATION**  
A KYOCERA GROUP COMPANY

AVX Corporation  
P. O. Box 887  
Myrtle Beach, SC 29578-0867  
Tel: (843) 448-9411

**CERTIFIED MAIL #7005 1820 0006 7243 2106**

October 14, 2008

Ms. Rhonda B. Thompson, P.E.  
Assistant Bureau Chief  
Bureau of Air Quality  
South Carolina Department of Health and Environmental Control  
2600 Bull Street  
Columbia, SC 29201

**RECEIVED**  
OCT 16 2008  
BUREAU OF  
AIR QUALITY

Re: AVX Corporation – Myrtle Beach, SC  
TV # 1340-0002  
Source Testing Request

Dear Ms. Thompson:

AVX Corporation (AVX) submits this letter in response to the September 25, 2008 letter requesting source emissions testing at our Myrtle Beach, South Carolina facility. It is our understanding that DHEC makes this request as part of its review of AVX's January 30, 2006 Title V major source operating permit renewal application. Because there are a number of possible approaches to this endeavor, we would like to establish mutually agreeable testing conditions and schedule for the source-testing program before submitting a detailed, site-specific source testing protocol. This will avoid further delays and will ensure that the results are relevant, useful to DHEC, and protective of public health and the environment. Once the general approach is approved, AVX will provide DHEC with a proposed testing schedule and a detailed site-specific source testing protocol.

In general, there are two reasons both the protocol and the schedule must be adjusted. First, as described below, this submittal is necessary due to the current production configurations and capabilities of the Myrtle Beach facility. Second, given the technical aspects of the testing protocol, once a mutually agreed upon testing scope has been determined, AVX will proceed with a testing contractor.

Turning to the first issue, in its September 25, 2008 letter, DHEC indicated that AVX has not conducted source tests on "its existing control device." For the purposes of this source testing program, AVX has assumed that DHEC is referring to, and requesting source testing of, its adsorber/desorber system (Control Device ID AD-4) and thermal oxidizer (Control Device ID TO-1) that control emissions from Unit ID 10 [MB2 – chip manufacturing automated process (CMAP) buildup]. It is noted that to date, source testing has not been requested by DHEC or required by a permit.

DHEC is requesting that AVX conduct tests for emissions of volatile organic compounds (VOCs) and speciated hazardous air pollutants (HAPs), as well as for the VOC capture and destruction efficiency of the adsorber/desorber system and the thermal oxidizer. According to DHEC's September 25, 2008 letter, testing should be performed at the maximum expected production rate or other production rate or operating parameter that would result in the highest emissions for the pollutants being tested. Due to current business conditions, the Myrtle Beach facility does not manufacture enough product to operate the

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CMAP buildup process at its maximum expected production rate or other production rate that would result in the highest VOC and HAP emissions. Accordingly, in order to meet the DHEC objective of maximum expected production rate, AVX proposes to inject the VOC and HAP containing process material ("slip") into the exhaust stream to simulate the full capacity buildup process emissions. Based on information provided by its consultants, AVX believes that the process chemistry (VOC and speciated HAP content) and operating parameters [slip usage rate (kg of slip per machine) and the processing rates of the machines] to adequately simulate the maximum emission rate. CMAP exhaust stream samples will be collected at the adsorber/desorber inlet, the adsorber/desorber outlet stack, and the thermal oxidizer outlet stack.

If this approach is approved by DHEC, the subsequent site-specific source test protocol will include the necessary details regarding the slip inject rates and records that will be maintained during the testing program to document the production rates. Testing methods and operating conditions for the requested capture and destruction efficiency will also be detailed in the protocol. Finally, AVX will propose a detailed set of milestones for the development of the testing protocols and associated reports.

We appreciate the opportunity to present this matter to DHEC. Please contact me at (843) 946-0506, or [jhuggins@avxus.com](mailto:jhuggins@avxus.com) with questions regarding this submittal.

Sincerely,



Jack Huggins  
Facilities Manager

cc: Larry Ragsdale, EQC Region 6, Myrtle Beach  
Max Justice, J.D.  
Boyd Holt, AVX Corporation  
Gary Yoder, O'Brien & Gere  
Mark Wenclawiak, O'Brien & Gere