

**South Carolina Department of Health and Environmental Control
Bureau of Air Quality**

**Response to Comments
Public Notice #13-014-TV-RE-M
AVX Corporation Title V Operating Permit
Myrtle Beach, Horry County, South Carolina
Permit No. TV-1340-0002**

The following is the SC Department of Health and Environmental Control's (DHEC) Bureau of Air Quality (Department) response to the comments made and issues raised during the formal comment period held February 25, 2013 – March 26, 2013 and the public meeting held on March 14, 2013, regarding the draft Title V Operating Permit for AVX Corporation. (AVX, or facility) at 801 17th Avenue South in Myrtle Beach, Horry County. The written comments received regarding the draft permit are available for viewing at the SC DHEC Columbia office located at 2600 Bull Street, Columbia, SC 29201, or on the SC DHEC webpage <http://www.scdhec.gov/environment/baq/PermittingDecisions>, or hardcopies can be requested by contacting our Freedom of Information Office at (803) 898-3817.

1. Request for a Monitoring Station: There was a request regarding the placement of a monitoring station next to the facility to monitor the levels of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) from the facility. DHEC only installs permanent monitors to determine the attainment status of a regional area. The Environmental Protection Agency (EPA) has established regulations that govern where permanent monitors must be placed. These monitors are not placed at individual facilities.

If the facility were to purchase monitoring equipment to conduct a short-term monitoring study near the facility, DHEC would be responsible for operating the monitor and analyzing the data. Since most of AVX's air emissions are volatile organic compounds (VOC), a VOC monitor would be the most appropriate to use. Since the monitor would measure all VOC emissions in the area including emissions from cars, trucks, buses, home fireplaces, outdoor burning, gas stations, and other industries, DHEC may not be able to distinguish AVX's emissions from other emission sources in the area.

The Title V operating permit limits the amounts of VOC and HAP emissions from AVX. Records of VOC usage and emissions are required to be submitted in semiannual reports. Control devices are required to be operating at all times the sources are in operation. The control systems are required to be tested every three years to ensure they are meeting the prescribed control efficiencies. There are limits on the opacity from the stacks as well. Process parameters are required to be monitored to ensure the control devices are operating in order to meet the limits in the permit. Inspections and recordkeeping are also required to ensure the control system is operating properly. Additionally, the facility must certify their operations to this permit on an annual basis and report their actual emissions inventory every three years. Stack testing results showed that AVX's

emissions are lower than previously estimated and air dispersion modeling demonstrated that air toxics emissions were well below the state air toxics standard, which is health protective. Therefore, an ambient monitor would not be warranted.

2. **Timely monitoring and notification of excess emissions:** A comment was received regarding the implementation of a warning system to alert sensitive residents and tourists of releases of VOCs and HAPs from the facility. The Emergency Planning and Community Right-To-Know Act (EPCRA) require regulated facilities to report releases of certain substances above a specified amount to DHEC as soon as possible. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) requires regulated facilities to report releases of certain substances to the Environmental Protection Agency's (EPA's) National Response Center promptly. Facilities are also required to call EPA's National Response Center to report a CERCLA substance release. All facilities are required to call DHEC's Emergency Response 24-hour number to report these releases. DHEC Emergency Response personnel will notify local emergency response personnel if a release may require evaluations or an immediate response. Citizens may also call the DHEC Emergency Response 24-hour number at 1-888-481-0125 or (803)253-6488 to report any releases or spills.

Air Quality regulations require all facilities that have malfunctions or process upsets lasting more than one hour that exceed an air permit limit to notify DHEC within 24 hours of the onset of the event. These regulations also require the facility to submit a written report within 30 days outlining the time, duration, and magnitude of the event and the steps taken to remedy the event and limit excess emissions.

3. **Emission and Manufacturing Increases:** A comment was received regarding opposition to any increases in emissions and/or manufacturing at AVX. Since the previous operating permit, actual and estimated emissions have been reduced. The facility has been downsizing throughout this renewal process and manufacturing throughputs have also been reduced from previous applications. Current emission estimates demonstrate that AVX is a minor source of emissions per the regulations. Minor sources normally do not have a federally enforceable operating permit; however, AVX is required to maintain this type of permit because of an EPA policy regarding National Emission Standards for Hazardous Air Pollutants. Emissions estimates for this renewal are based on these reduced emissions.

Because AVX is no longer a major source of emissions, the facility is therefore no longer subject to permit emission restrictions put in place previously to avoid triggering the Prevention of Significant Deterioration (PSD) regulations. For further discussion, please see the "Project Regulatory Applicability Review" section of statement of basis. However, a facility-wide emission limit was requested by the facility and was included in the draft permit. In the future, if AVX wishes to increase production or emissions above the permitted emissions, a permit review will be required.

4. **Impacts to Withers Swash:** There was a comment with respect to the detriment of the water quality in the surrounding area. The Bureau of Water has addressed the concern of impacts to Withers Swash in the National Pollutant Discharge Elimination System (NPDES) permit.

5. **Impacts to Groundwater:** There was a comment with respect to the groundwater contamination impacts in the surrounding area. SC DHEC's Bureau of Land and Waste Management oversees the groundwater cleanup that is required by the facility. On February 15, 2012, DHEC's Bureau of Land and Waste Management has responded to the concerns expressed in a letter dated November 27, 2011, regarding groundwater impacts. Periodic updates on the groundwater clean-up have also been provided to the community, most recently during a community meeting held by DHEC on March 14, 2013. More information related to the groundwater clean-up can be found on DHEC's AVX website (www.scdhec.gov/avx).

6. **Lack of Concern of Combined Impacts to Air, Groundwater and Surface Water:** A comment was received stating that DHEC and the EPA have shown little concern for the combined impact of the tons of chemicals placed in the air, groundwater, and surface water. DHEC is committed to enforcing federal and state environmental laws, which are set to protect public health and the environment. DHEC has evaluated the facility's operations, both during the permitting process and through ongoing compliance reviews, to ensure that the facility is operated in a manner that minimizes impacts to public health and the environment. Additionally, DHEC has provided the community with updated information related to the permitting, compliance, and groundwater clean-up activities taking place at the AVX site. DHEC has conducted and attended community meetings to provide up-to-date information, sent periodic newsletters to community members who have signed up for the AVX mailing list, and developed a website (www.scdhec.gov/avx) dedicated to providing current information on the groundwater clean-up, air and water permitting, compliance inspection reports, and opportunities for community involvement.