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Promoting and protecting the health of the public and the environment

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November 6, 2008

Mr. Jack Huggins AVX Corporation PO Box 867 Myrtle Beach, SC 29578

Re: NPDES Permit # SC0047953

AVX Corporation, Myrtle Beach Plant

Horry County, South Carolina

Reg: CEI (Compliance Evaluation Inspection)

September 17, 2008

Dear Mr. Huggins:

A review of the attached CEI indicates that the NPDES permit requirements evaluated during the inspection were being met; therefore, no response is necessary.

DHEC's Center for Waste Minimization offers a free, non-regulatory service to help facilities identify pollutant sources and develop programs to reduce them. Contact the Center at (803) 896-8985 for more information concerning this service.

If you have any questions regarding this report, please contact me at (803) 898-4306.

Sincerely.

Mark Fogarty

Facility Compliance Manager

Water Pollution Compliance Section

Bureau of Water

mailto:fogartme@dhec.sc.gov

Attachment

cc: Larry Ragsdale, Director, Region 6 EQC

Fred Earnhardt, Inspector, Region 6 EQC Ted Ambrose, Reviewer, Region 6 EQC

File



## South Carolina Department of Health and Environmental Control

## NPDES Compliance Inspection Report

NPDES Permit #: SC0047953
---------------------------

Inspection Type: CEI Date of Inspection: September 17, 2008

**Entry Time:** 13:30 **Exit Time:** 16:00

Permit Effective Date: March 01, 2007 Permit Expiration Date: June 30, 2011

## Name and Location of Facility:

AVX Corporation 801 17<sup>th</sup> Avenue South Myrtle Beach, S.C. 29577 N 33.6782°, W 78.9093°

## Name, Title, Telephone No. of On-Site Representative(s):

Jack Huggins, Facility Manager: 843.946.0506

Boyd Holt, Environmental Health & Safety Manager: 843.946.0377

# Name and Address of Responsible Official/Title/Telephone No.:

Larry Blue

Post Office Box 867

Myrtle Beach, S.C. 29578-0867

## \*Areas Evaluated During Inspection

\* Permit

\* Records/Reports

\* Facility Site Review

\*Effluent/Receiving Waters Collection System \* Flow Measurement

\* Self-Monitoring Compliance Schedules

Laboratory Other:

\* Operation and Maintenance Sludge Handling/Disposal

Pretreatment Storm Water

Name of Inspector:

Ted Ambrose

Region: Region 6

Name of Reviewer:

Ted Ambrose

Date: September 17, 2008

**Signature of PSC Reviewer:** 

Date

## COMPLIANCE EVALUATION INSPECTION AVX CORPORATION MYRTLE BEACH, SOUTH CAROLINA NPDES # SC0047953

On September 17, 2008, personnel from the South Carolina Department of Health and Environmental Control (DHEC) performed a Compliance Evaluation Inspection at AVX Corporation, Myrtle Beach, South Carolina. All findings made during the inspection were discussed with the representatives in a closing conference.

The following individuals were present during the inspection:

<u>NAME</u>	<u>ORGANIZATION</u>	<b>TELEPHONE</b>
Jack Huggins	AVX Corporation	843.946.0506
Boyd Holt	AVX Corporation	843.946.0377
Fred Earnhardt	SC DHEC, Region 6	843.238.4378
Ted Ambrose	SC DHEC, Region 6	843.238.4378

### **PERMIT**

AVX Corporation is permitted to discharge treated wastewater and land-apply treated wastewater associated with groundwater remediation by NPDES permit SC0047953. The receiving waterbody is Withers Swash, which flows to the Atlantic Ocean just south of 3<sup>rd</sup> Avenue South in Myrtle Beach, S.C. This permit became effective on March 01, 2007 and expires on June 30, 2011. The location and discharge associated with this permit are accurately described in the referenced permit. This facility pumps contaminated groundwater to an air stripper, discharging the treated water to a series of three (3) stormwater ponds on the facility's property. Water from the first stormwater pond is used for land application upon a cumulative of seven (7) acres landscaped area. Land-application rates are limited to 8,857 gallons per day per acre. This limits daily land-application flow to 61,999 gallons per day. The permit does not limit flow of treated water to the onsite stormwater ponds and Withers Swash.

**RATING: Satisfactory** 

#### **RECORDS AND REPORTS**

Records and reporting were reviewed for the following months: March 2008, April 2008, May 2008, and August 2008. Records were readily available onsite, going back at least three (3) years, per permit requirement. Sampling and analysis data included dates, times, location, and individual(s) performing sampling / analysis. Reviewed analytical results and recordkeeping were consistent with data submitted on facility's monthly discharge monitoring reports (DMRs). However, based on review of records, it appears that AVX may have overestimated production from the groundwater remediation air stripper by an order of magnitude. AVX must resubmit DMRs for affected months with corrected flow values. Facility personnel have historically monitored and reported the flow rate from the groundwater-stripping unit rather than the flow to land application alone, again resulting in a worse-case flow estimate. However, only a fraction of treated water produced by the groundwater-stripping unit is land-applied. Facility personnel stated they would revise their reporting to indicate actual flow to land application and total flow produced by the groundwater-stripping unit (i.e., land-

application flow will be a subset of total flow). As referenced previously, AVX Corporation is required to monitor and report the flow from the air-stripper unit and is doing so.

**RATING: Satisfactory** 

### **FACILITY SITE REVIEW**

A site inspection was performed at this facility's Myrtle Beach plant. As referenced previously, treated water from the groundwater remediation system is pumped through a series of ponds and either land applied upon seven (7) acres of landscaping or discharged from the third pond to tributaries leading to Withers Swash. At the time of this inspection, the groundwater remediation air-stripping unit was operational. Flow meter at the time of this inspection was 1122445. Flow exiting the final stormwater pond was negligible and a function of wind/wave action on the water's surface.

**RATING: Satisfactory** 

### FLOW MEASUREMENT

See "Records and Reports"

**RATING: Satisfactory** 

### **COMPLIANCE SCHEDULE**

Facility is not currently under any compliance schedule associated with this permit.

**RATING: Satisfactory** 

#### **SELF-MONITORING PROGRAM**

AVX's self-monitoring program meets the intent of the NPDES Permit. The sampling locations are adequate for representative samples. Sampling, holding, and analysis times appear adequate to assure valid results.

**RATING: Satisfactory** 

## **OPERATION AND MAINTENANCE**

An Operation & Maintenance Manual for pertinent devices associated with this permit is maintained. All equipment appeared to be operating properly at the time of this inspection.

**RATING: Satisfactory** 

#### **SLUDGE DISPOSAL**

Sludge disposal is not applicable to this permit.

**RATING: Satisfactory** 

#### LABORATORY

AVX uses a Shealy Environmental Services, Inc. (Laboratory ID #32010) for NPDES testing. This laboratory is currently certified to analyze all NPDES parameters required by this permit. A review of submitted analysis is consistent with those values reported on the reviewed DMRs. SC DHEC Lab Certification evaluated the onsite laboratory operated by AVX personnel in March 2007. Results from that inspection were acceptable.

**RATING: Satisfactory**