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A.P.C.D.

January 8, 2003

Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003
Attn: Mr. Lyle Olson

Re: Written follow-up notification of 'breakdown' occurrences on 1/5/03 & 1/6/03.

Mr. Olson:

The following information is being provided as a written report follow-up to the 'breakdown' occurrences related to our Alzeta VOC thermal oxidizer on 1/5/03 and 1/6/03. The incidents took place at the XYZ Co – Newbury Park facility: Permit to Operate No. 2007 The District was notified of each incident via the 'Breakdown Hotline: 805 654-2797. This written report is being provided and is formatted according to the requirements as specified in Rule 32 D.

Incident # 1
Date Of Occurrence: 1/5/03

Time Of Occurrence: 5:16 a.m.

Details: The Alzeta thermal oxidizer experienced an unexpected shut-down at 5:16 a.m. According to established protocol, key personnel were immediately notified and responded within minutes of the event. The Alzeta thermal oxidizer was restored to normal operation at approximately 5:21 a.m. (5 minutes). Loss of temperature did not occur and is not indicated on the chart record. However, the system was in by-pass mode for the duration of the downtime.

Specific Reason For Outage: The route cause is yet undetermined but is thought to be electrical in nature.

Corrective Actions: The Facilities Dept. is currently investigating possible electrical issues both internal to the tool and supplied to the plant. Appropriate actions will be taken based on these findings in an effort to make the system more robust.

Estimated Emissions: The overall downtime was approximately 5 minutes. Notifications for shut-down were made but, given the short duration of the outage, it is likely not all processes had been shut-down by the time the VOC system was restored to normal operation. For this reason, a worst case scenario of 5 minutes (no treatment) was used to calculate emissions. Based on Potential to Emit values, building 007 (321 Forest St) solvent usage less allowable deductions for waste capture efficiencies is 117,409 lbs./yr.

117,409 lbs ROC / 365 days per year / 1440 minutes per day * 5 minutes = 1.1 lbs. ROC emitted.

Pictures (if available): No pictures were available nor would they be of value regarding this incident.

Incident # 2
Date Of Occurrence: 1/6/03

Time Of Occurrence: 5:37 a.m.

Details: The Alzeta thermal oxidizer experienced an unexpected shut-down at 5:37 a.m. According to established protocol, key personnel were immediately notified and responded within minutes of the event. The Alzeta thermal oxidizer was restored to normal operation at approximately 5:41 a.m. (4 minutes). Loss of temperature did not occur and is not indicated on the chart record. However, the system was in by-pass mode for the duration of the downtime.

Specific Reason For Outage: The route cause is yet undetermined but is thought to be electrical in nature.

Corrective Actions: The Facilities Dept. is currently investigating possible electrical issues both internal to the tool and supplied to the plant. Appropriate actions will be taken based on these findings in an effort to make the system more robust.

Estimated Emissions: The overall downtime was approximately 4 minutes. Notifications for shut-down were made but, given the short duration of the outage, it is likely not all processes had been shut-down by the time the VOC system was restored to normal operation. For this reason, a worst case scenario of 4 minutes (no treatment) was used to calculate emissions. Based on Potential to Emit values, building 007 321 FORREST ST, solvent usage less allowable deductions for waste capture efficiencies is 117,409 lbs./yr.

117,409 lbs ROC / 365 days per year / 1440 minutes per day * 4 minutes = 0.9 lbs. ROC emitted.

Pictures (if available): No pictures were available nor would they be of value regarding this incident.

Incident # 3
Date Of Occurrence: 1/6/03

Time Of Occurrence: 11:42 p.m.

Details: The Alzeta thermal oxidizer experienced an unexpected shut-down at 11:42 p.m. According to established protocol, key personnel were immediately notified and responded within minutes of the event. The Alzeta thermal oxidizer was restored to normal operation at approximately 12:28 a.m. on 1/7/03 (46 minutes). When called into the VCAPCD Breakdown Hotline, this incident was reported as occurring on 1/7/03. It actually began late on 1/6/03 and continued into early a.m. on 1/7/03.

Specific Reason For Outage: The facility at 321 FORREST Dr. experienced an interruption in supplied power to the site. The loss of power caused the VOC system, and production processes in the fab, to be shut-down.

Corrective Actions: Though power interruptions are difficult to protect against, it is possible that the prior two incidents were the result of very small interruptions or variations in the supplied power to the system. Though no specific corrective action is required regarding an interruption of supplied power to the site, the quality of supplied power is being analyzed to determine if it may be a common route cause for all three outages reported in this report. Appropriate corrective actions will be taken based on the findings of this analysis.

Estimated Emissions: Because the interruption in power affected the entire facility at 321 FORREST Dr., manufacturing processes were taken down with the VOC thermal oxidizer. Because of this, emissions from the outage are estimated as negligible.

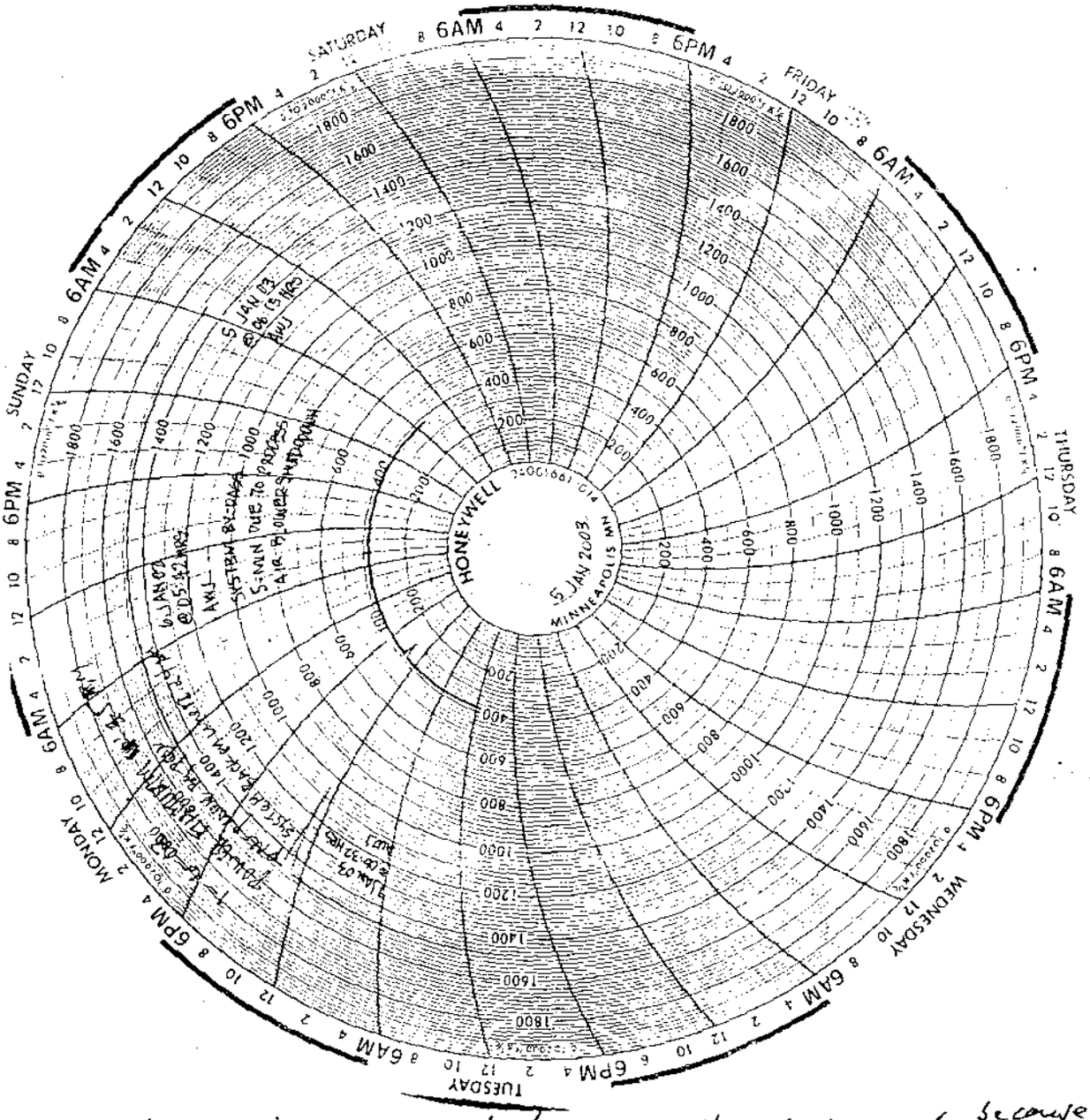
Pictures (if available): No pictures were available nor would they be of value regarding this incident.

Should you have any questions, please do not hesitate to contact me at 805 6451400

Thank you:

MAY DAY, CEO
XYZ COMPANY
321 FORREST GREEN STREET
NEWBURY PARK, CA 923201

Attch:
Copy - VOC Chart Records



Incidents 1 & 2 are not shown on this chart record because temperature did not decrease. Incident #3 is shown (1-6-03)