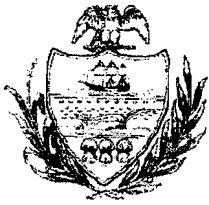


Allegheny County Health Department

DIRECTOR
Bruce W. Dixon, M.D.

Air Quality Program
301 39th Street – Building 7
Pittsburgh PA 15201-1891

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April 28, 2008

Mr. Ronald D. Lerario
Director
Eastman Chemical Company
P.O. Box 567
State Highway 837
West Elizabeth, PA 15088-0567

CERTIFIED MAIL
04-1622-E

RE: ORDER OF THE DEPARTMENT – Eastman Chemical Company

Dear Mr. Lerario:

Enclosed please find the Order of the Department issued to Eastman Chemical Company on April 28, 2008. The purpose of this order is to memorialize your decision to retire tanks 17, 18, 61 and 63 in order to address its Best Available Retrofit Technology (BART) eligibility requirements. It is the Department's understanding that Eastman has permanently taken these tanks out of service and rendered them incapable of storing liquids.

Thank you for your prompt attention to this matter.

Sincerely,

Jim Thompson
Acting Air Quality Program Manager

Allegheny County Health Department

DIRECTOR

Bruce W. Dixon, M.D.



3333 Forbes Avenue
Pittsburgh, Pennsylvania 15213
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April 28, 2008

IN RE: Eastman Chemical Company
PO Box 567
State Highway 837
West Elizabeth, PA 15088-0567

ORDER

WHEREAS, The Director of the Allegheny County Health Department (Department) has been delegated authority pursuant to the federal Clean Air Act, 42 U.S.C. §§ 7401 *et seq.*, and the Pennsylvania Air Pollution Control Act, 35 P.S. §§ 4001 *et seq.*, and the Department is a local health agency organized under Local Health Administration Law, Act 315 of August 24, 1951, P.L. 1304, as amended, 16 Pa.C.S. §12001 *et seq.* (Act 315), whose powers and duties include the enforcement of laws relating to public health within Allegheny County, including the Allegheny County Health Department's Rules and Regulations, Article XXI, Air Pollution Control (Article XXI); and

WHEREAS, pursuant to section 2109.03 of Article XXI, whenever the Director of the Allegheny County Health Department or his designated representative finds, on the basis of any information available to him, that any source is operated in violation of any provision of Article XXI, he may order the person or persons responsible for the source to comply with Article XXI or he may order the immediate shutdown of the source or any part thereof; and

WHEREAS, the Department, has determined that Eastman Chemical Resins, Inc. (EASTMAN), State Highway 837, Allegheny County, West Elizabeth, PA 15088-0567, is the owner and operator of synthetic hydrocarbon resin production facilities at State Highway 837, Allegheny County, West Elizabeth, PA 15088-0567 (facility) is a major source of volatile organic compounds (VOCs) as defined in section 2101.20 of Article XXI; and

WHEREAS, the closure of the tanks 17, 18, 61 & 63 will decrease the potential emissions of VOCs from the facility, due to VOC emissions from units constructed between August 2, 1962 and August 7, 1977, to less than two-hundred and fifty tons; and

WHEREAS, the Department has determined that 40 CFR Part 51, Region Haze Regulations and Guidelines for Best Available Retrofit Technology Determinations will no longer apply to the facility; and

NOW THEREFORE, this 24th day of April 2008, the Department hereby issues this Order:

EASTMAN shall immediately and permanently render volatile organic storage tanks 17, 18, 61 & 63 unusable for the storage of VOCs.

If EASTMAN is aggrieved by any part of this Order, they have the right to file a written Notice of Appeal to the Director within ten (10) days of receipt of this Order in accordance with Allegheny County Health Department's Rules and Regulations, Article XI, Hearings and Appeals. The Order will become final ten (10) days after receipt barring an appeal.

DONE AND ENTERED this 28th day of April, 2008, in Allegheny County, Pennsylvania

ALLEGHENY COUNTY HEALTH
DEPARTMENT

By: Bruce W. Dixon, 4/18

Bruce W. Dixon, M.D.
Director

cc: J. E. Thompson, Acting Program Manager
Henry Miller, Solicitor

**ALLEGHENY COUNTY HEALTH DEPARTMENT
AIR QUALITY PROGRAM**

Subject: Review Memo for BART Application
Eastman Chemical Resins, Inc.
P.O. Box 567
West Elizabeth, PA 15088-0567

May 8, 2008

Operating Permit #: 95-0058

To: James Thompson
Acting Air Quality Program Manager
Allegheny County Health Department

From: Tom Lattner, Air Pollution Control Engineer

Through: Jayme Graham
Supervisor Planning Section
Air Quality Program
Allegheny County Health Department

Sandra Etzel
Chief Engineer
Air Quality Program
Allegheny County Health Department

1. Background: Eastman Chemical Resins is a chemical process plant. It had 75 units that were initially determined to be BART eligible. The company decided to retire four of those units (four tanks) in order to reduce potential emissions to below 250 tpy for all eligible pollutants.
2. Process Description: The Source ID numbers of the BART eligible units at this facility are listed on the attached table.
3. Regulatory Analysis:

Eastman Chemical Resins has sources at this facility which were originally constructed between 1962 and 1977. To address the BART requirements, the company elected to retire four tanks. Tanks 17, 18, 61 and 63 (corresponding to Sources S202, S202, S224 and S226) have been retired from service and the company has removed them from its Operating Permit Application. To memorialize the company's decision to retire these tanks, the Allegheny County Health Department issued an Order on April 24, 2008, stating that "Eastman shall immediately and permanently render volatile organic storage tanks 17, 18, 61 & 63 unusable for the storage of VOCs." (Even before this Order, the ACHD had conducted an inspection of the tanks in November, 2007, and found that one had large holes cut into it and the that the piping and instrumentation had been removed from the others, making it impossible for the tanks to be placed back into service without making major modifications.) As a result, total emissions do not exceed 250 tpy for any of the

eligible pollutants. Thus the plant's units are not subject to the Best Available Retrofit Technology (BART) requirements that are a part of the Regional Haze rules specified in 40 CFR Part 51, Subpart P Protection of Visibility. Finally, were those units subject to the BART requirements, there currently is not adequate technology available to determine visibility impairment by individual sources of VOCs.

4. BART Analysis: Not required.

cc: Nancy Herb, PA DEP, Harrisburg

Eastman Chemicals (Tax I.D. 62-1837994)

Jefferson Site (Facility I.D. 00265)

BART Category 21 - Chemical Process Plant

Emissions data taken from Form K of the June 29, 2001 Operating Permit Application

Type of controls:

Units within the 1962 - 1977 timeframe

Point	Process Unit	Emission Source	Installation Date	VOCs Potential To Emit (lb/yr)	VOCs Actual (lb/yr)	PM ₁₀ Potential To Emit (lb/yr)	PM ₁₀ Actual (lb/yr)	NOx Potential To Emit (lb/yr)	NOx Actual (lb/yr)	SO ₂ Potential To Emit (lb/yr)	SO ₂ Actual (lb/yr)
F029	WWPT	PRIMARY CLARIFIER	1976	400	400	*	*	*	*	*	*
F033	WWPT	702-A TANK	1977	3040	2533	*	*	*	*	*	*
F034	WWPT	702-B TANK	1977	3040	2533	*	*	*	*	*	*
F035	WWPT	702-C TANK	1977	3040	2533	*	*	*	*	*	*
F036	WWPT	SLUDGE BATCH TANKS	1976	200	170	*	*	*	*	*	*
F037	WWPT	SLUDGE BATCH TANKS	1976	200	170	*	*	*	*	*	*
S013	WW POLY	FEED DRYERS	1972	28400	24900	*	*	*	*	*	*
S014	WW POLY	WEST BLEND TANK	1972	5280	4620	*	*	*	*	*	*
S015	WW POLY	NORTH BLEND TANK	1978 (In exist Aug 7, 1977)	5280	4620	*	*	*	*	*	*
S017	WW POLY	REACTORS	1972, 1978 (1972 unit applies)	6990	12260	*	*	*	*	*	*
S018	WW POLY	NEUTRALIZER	1972	13980	8840	280	240	*	*	*	*
S020	WW POLY	FILTRATE RECEIVER	1972	5860	5140	*	*	*	*	*	*
S021	WW POLY	AUXILLARY REC	1972	4080	3580	*	*	*	*	*	*
S024	WW POLY	T-74,68,69 TANKS	1974, 1977, 1977	1720	1720	*	*	*	*	*	*
S025	WW POLY	T-73,75,76,77 TANKS	1972, 1972, 1973, 1973	7780	7780	*	*	*	*	*	*
S026	WW POLY	T-67 TANKS	1977	760	760	*	*	*	*	*	*
S038	TANKS	262 TANK (C-5)	1977	80		*	*	*	*	*	*
S050	WW POLY	NEUTRALIZER EXHAUST	1972	13980	2960	*	*	*	*	*	*
S077	V8-UNIT	1ST STG VACUUM JET	1964	14740	11247	*	*	*	*	*	*
S078	V8-UNIT	2ND STG VACUUM JET	1964	14740	11247	*	*	*	*	*	*

Point	Process Unit	Emission Source	Installation Date	VOCs Potential To Emit (lb/yr)	VOCs Actual (lb/yr)	PM ₁₀ Potential To Emit (lb/yr)	PM ₁₀ Actual (lb/yr)	NOx Potential To Emit (lb/yr)	NOx Actual (lb/yr)	SO ₂ Potential To Emit (lb/yr)	SO ₂ Actual (lb/yr)
S079	V-8 UNIT	RK #2	1974	180	47	*	*	*	*	*	*
S080	V-8 UNIT	RK#3	1974	180	47	*	*	*	*	*	*
S081	V-8 UNIT	RK#4	1974	180	47	*	*	*	*	*	*
S087	V-8 UNIT	CB-FURNACE	1973	152	31	200	41	3990	822	24	5
S088	V-8 UNIT	H-8 FURNACE	1974	109	52	144	68	2880	1357	17	8
S093	V-8 UNIT	MIXPOT	1974	376	48	*	*	*	*	*	*
S094	V-8 UNIT	AGITATOR	1974	2258	289	*	*	*	*	*	*
S106	LTC 1 & 2	#CB-FURNACE	1975	152	74	200	98	3990	1956	24	12
S108	LTC 1 & 2	RECLAIM SOLUTION TANK	1975	8150	0	*	*	*	*	*	*
S109	LTC 1 & 2	#1 LTC VACUUM JET	1975	38507	36924	*	*	*	*	*	*
S111	LTC 1 & 2	RK #5	1975	5679	2275	*	*	*	*	*	*
S112	LTC 1 & 2	RK #6	1975	1636	693	*	*	*	*	*	*
S113	LTC 1 & 2	RK#7	1975	1636	693	*	*	*	*	*	*
S114	LTC 1 & 2	#1 & #2 LTC SANDVIK FLAKERS	1976, 1981 (1976 unit applies)	3568	1594	*	*	*	*	*	*
S143	BOILER HOUSE	#3-#4 FW BOILER	1950/67	2989	494	7192	1720	72142	16687	309	52
S145	TANKS	21 TANK	1967	11428		*	*	*	*	*	*
S147	WWTP	701-A AND 701-B TANK	1976	780	780	*	*	*	*	*	*
S149	WWPT	LIME FLASH MIX TANK	1976	3480	2880	*	*	*	*	*	*
S173	TANKS	8-1-C TANK	1962	5576	405	*	*	*	*	*	*
S174	TANKS	8-1-D TANK	1964	5576	405	*	*	*	*	*	*
S175	TANKS	8-1-E TANK	1966	5576	405	*	*	*	*	*	*
S187	TANKS	R-1-A TANK	1978	9449	851	*	*	*	*	*	*
S188	TANKS	R-1-B TANK	1978	8761	783	*	*	*	*	*	*
S202	TANKS	17 TANK	1966	xxx	xxx	Retired for		BART	purposes	xxx	xxx
S203	TANKS	18 TANK	1966	xxx	xxx	Retired for		BART	purposes	xxx	xxx
S206	TANKS	22TANK	1971	8875	2483	*	*	*	*	*	*
S207	TANKS	23 TANK	1971	8848	1300	*	*	*	*	*	*
S208	TANKS	24 TANK	1971	11450	155	*	*	*	*	*	*
S209	TANKS	25 TANK	1971	13175	395	*	*	*	*	*	*
S210	TANKS	26 TANK	1970	3288	3288	*	*	*	*	*	*

Point	Process Unit	Emission Source	Installation Date	VOCs Potential To Emit (lb/yr)	VOCs Actual (lb/yr)	PM ₁₀ Potential To Emit (lb/yr)	PM ₁₀ Actual (lb/yr)	NOx Potential To Emit (lb/yr)	NOx Actual (lb/yr)	SO ₂ Potential To Emit (lb/yr)	SO ₂ Actual (lb/yr)
S211	TANKS	27 TANK	1970	3288	3288	*	*	*	*	*	*
S212	TANKS	28 TANK	1970	3288	3288	*	*	*	*	*	*
S213	TANKS	29 TANK	1970	3288	3288	*	*	*	*	*	*
S224	TANKS	61 TANK	1965	xxx	xxx	Retired	for	BART	purposes	xxx	xxx
S226	TANKS	63 TANK	1971	xxx	xxx	Retired	for	BART	purposes	xxx	xxx
S227	TANKS	65 TANK	1977	6596	482	*	*	*	*	*	*
S230	TANKS	71 TANK	1972	33302	431	*	*	*	*	*	*
S231	TANKS	72 TANK	1973	22825	166	*	*	*	*	*	*
S232	TANKS	78 TANK	1973	35933	2835	*	*	*	*	*	*
S233	TANKS	83 TANK	1962	9546	0	*	*	*	*	*	*
S234	TANKS	126 TANK	1970	7528	592	*	*	*	*	*	*
S237	HYDROGENATION	T-160, T-161 TANKS	1963	3899	2078	*	*	*	*	*	*
S238	THERMAL POLY	T-162 TANK	1963	6116	2716	*	*	*	*	*	*
S242	TANKS	203 TANK	1971	10082	419	*	*	*	*	*	*
S252	TANKS	257 TANK	1969	2723	82	*	*	*	*	*	*
S255	TANKS	260 TANK (C-5)	1977	80	80	*	*	*	*	*	*
S257	TANKS	263 TANK (C-5)	1977	120	120	*	*	*	*	*	*
S258	TANKS	264 TANK	1977	3732	3732	*	*	*	*	*	*
S259	TANKS	265 TANK	1977	3732	3732	*	*	*	*	*	*
S261	TANKS	360 TANK	1966	2423	29	*	*	*	*	*	*
S262	TANKS	361 TANK	1966	2457	2	*	*	*	*	*	*
S263	TANKS	362 TANK	1966	8238	0	*	*	*	*	*	*
S264	TANKS	363 TANK	1966	11218	11218	*	*	*	*	*	*
S265	TANKS	364 TANK	1966	11218	11218	*	*	*	*	*	*
S299	WWPT	SUMPS/DAF	1976	580	580	*	*	*	*	*	*
TOTAL lbs/yr				487816	215827	8016	2167	83002	20822	374	77
TOTAL tons/yr				243.91	107.91	4.01	1.08	41.50	10.41	0.19	0.04
				(PTE)	(Actual)	(PTE)	(Actual)	(PTE)	(Actual)	(PTE)	(Actual)

* = Not on Form K

DATA FOR RETIRED UNITS

Point	Process Unit	Emission Source	Installation Date	VOCs Potential To Emit (lb/yr)	VOCs Actual (lb/yr)	PM ₁₀ Potential To Emit (lb/yr)	PM ₁₀ Actual (lb/yr)	NOx Potential To Emit (lb/yr)	NOx Actual (lb/yr)	SO ₂ Potential To Emit (lb/yr)	SO ₂ Actual (lb/yr)
S202	TANKS	17 TANK	1966	11174	721	*	*	*	*	*	*
S203	TANKS	18 TANK	1966	8337	681	*	*	*	*	*	*
S224	TANKS	61 TANK	1965	14132	2502	*	*	*	*	*	*
S226	TANKS	63 TANK	1971	2207	125	*	*	*	*	*	*