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Tertiary ID	

AIRC P - 100219815 - RP - 20160226 - Deviation

Rec'd FEB 29 2016 TCEQ R5 Tyler *mrb*

Eastman Chemical Company
Texas Operations
P.O. Box 7444
Longview, Texas 75607-7444
Phone (903) 237-5000

EASTMAN

PM
February 26, 2016

Certified Mail Receipt No. 7010 0290 0002 3713 8955

Ms. Michelle Baetz (2)
Air Section Manager
Texas Commission on Environmental Quality
2916 Teague Drive
Tyler, Texas 75701

Dear Ms. Baetz:

Re: Semiannual Title V Potential Deviation Report

Company: Eastman Chemical Company

Location: Longview, Harrison County

Reporting Period Start Date: August 1, 2015

Reporting Period End Date: January 31, 2016

Unit: C5 - Ethylene Glycol

Permit No.: O1974

Regulated Entity No.: 100219815

Customer Reference No.: 601214406

In accordance with 30 TAC 122.145(2), Eastman Chemical Company, Texas Operations submits the original and a copy of the Semiannual Title V Potential Deviation Report, along with the Responsible Official Certification (OP-CRO1) form.

If you have any questions concerning this report, please contact me at 903-237-6093 or Neil Quinn at 903-237-5474.

Very truly yours,

Timothy M. McMeen

Timothy M. McMeen, Engineering Associate
Corporate Environmental Affairs - Air Group

Attachments

RECEIVED

APR 24 2019

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RESPONSIBLE CARE[®]
OUR COMMITMENT TO SUSTAINABILITY



Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION					
RN: RN100219815		CN: CN601214406		Account No.: HH-0042-M	
Permit No.: O1974			Project No.: -		
Area Name: C5 - Ethylene Glycol			Company Name: Eastman Chemical Company		
II. CERTIFICATION TYPE <i>(Please mark the appropriate box)</i>					
<input type="checkbox"/> Responsible Official			<input checked="" type="checkbox"/> Duly Authorized Representative		
III. SUBMITTAL TYPE <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>					
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input type="checkbox"/> Update to Permit Application			
<input type="checkbox"/> GOP Initial Permit Application		<input type="checkbox"/> Permit Revision, Renewal, or Reopening			
<input checked="" type="checkbox"/> Other: <u>Title V Semiannual Potential Deviation Report (August 1, 2015 - January 31, 2016)</u>					
IV. CERTIFICATION OF TRUTH					
This certification does not extend to information which is designated by the TCEQ as information for reference only.					
I, <u>Darrell J. Rachels</u> certify that I am the <u>DAR</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i>					
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:					
<i>Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>					
Time Period: From _____ to _____ <i>Start Date</i> <i>End Date</i>					
Specific Dates: <u>02/26/2016</u> <i>Date 1</i> <i>Date 2</i> <i>Date 3</i> <i>Date 4</i> <i>Date 5</i> <i>Date 6</i>					
Signature: <u></u> Signature Date: <u>2/22/2016</u>					
Title: <u>Superintendent, Chemicals Division</u>					

**Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form¹
Form Dev Rep (Part 2)**

Texas Operating Permit Deviation Report Form

Permit Holder Name		Eastman Chemical Company				Customer Number	CN601214406	
Area Name		C5 – Ethylene Glycol				Account Number	HH-0042-M	
Report Period Start Date	08/01/15	Report Period End Date	01/31/16	Operating Permit Number	O1974	Report Submittal Date	02/26/16	
Operating Permit Requirement for Which Deviations are Being Reported								
ID Number		Term and Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
EP037D514 EP037D513	N/A	N/A	VOC	30 TAC 122.217(a)(2) 60.7(a)(2)-(a)(3) 60.665(l)	ST/RP	N/A	N/A	N/A

Dev Item No.	Deviation Period				No. of Devs ²	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	4/2013		8/19/15		Previously Counted	Eastman did not submit minor permit revisions for FOP O1974 prior to operating two new distillation columns subject to 40 CFR Part 60, Subpart NNN (EP037D514 – 7/2011; EP037D513 – 4/2013). Eastman also did not submit start-of-construction and start-up notifications for the new distillation units as required by 60.7(a)(2) and 60.7(a)(3), respectively. In addition, Eastman did not include these distillation units on the semiannual reports for 40 CFR Part 60, Subpart NNN.	Eastman submitted minor permit revisions for FOP O1974 on August 17, 2015 to add applicability for Unit IDs EP037D513 and EP037D514. Eastman submitted a notification of start-of-construction and start-up of the unit on August 19, 2015. The calculated TRE for these Unit IDs is greater than 8.0; therefore, no control is required. Eastman has included these distillation units on the semiannual report for 40 CFR Part 60, Subpart NNN for the time period February 1, 2015 – July 31, 2015, which was submitted on or before August 28, 2015.

¹Eastman Chemical Company is identifying the information herein as instances of potential deviations from the cited regulatory requirements.

²In the absence of applicable regulations directing how to quantify the number of potential deviations, Eastman made a good faith estimate of this number.

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Federal Operating Permit Deviation Report Form¹
Form Dev Rep (Part 2)**

Texas Operating Permit Deviation Report Form

Permit Holder Name		Eastman Chemical Company				Customer Number	CN601214406	
Area Name		C5 – Ethylene Glycol				Account Number	HH-0042-M	
Report Period Start Date	08/01/15	Report Period End Date	01/31/16	Operating Permit Number	O1974	Report Submittal Date	02/26/16	
Operating Permit Requirement for Which Deviations are Being Reported								
ID Number		Term and Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
EP036U1	N/A	STC-8	Argon	NSR 49363, SC1	ST	N/A	N/A	N/A

Dev Item No.	Deviation Period				No. of Devs ²	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
2	12/18/07		Ongoing		Previously Counted	Discovered and disclosed under the TCEQ Audit Privilege Act (Investigation No. 1030503) It was discovered that PBR Registration No. 83679 represented emissions for argon in the emissions calculations, but the overall summary sheet did not capture this representation. Therefore, argon emissions are not authorized for FIN/EPN EP036U1/036U1.	This discrepancy was corrected on the NSR Permit No. 49363 renewal application that was submitted on February 14, 2013. This item will be marked as completed when the permit is issued by the TCEQ.

Total Deviations	Previously Counted	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence Form supporting this deviation report?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form¹
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

AIR CO RN100219815/RP

Permit Holder Name		Eastman Chemical Company			Customer Number		CN601214406
Area Name		C-5 Ethylene Glycol			Account Number		HH-0042-M
Report Period Start Date	8/1/2015	Report Period End Date	1/31/2016	Operating Permit Number	O1974	Report Submittal Date	2/26/2016

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term and Condition No.	Pollutant	Regulatory Requirement Citation	Type of Rqmt	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
PROEOEG2	N/A	STC-12	VOC	NSR 1329, SC1	ST	N/A	N/A	N/A

Dev Item No	Deviation Period				No. of Devs ²	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
2166	10/06/2015	15:20	10/06/2015	15:30	1	The reactor quench exchanger overpressured and relieved process steam to the atmosphere due to an unexpected shutdown of the light-ends removal column feed pump. Estimated excess air emissions to the atmosphere were 52 lbs of ethylene glycol and 2 lbs Other VOC.	The light-ends removal column feed pump was restarted and the relief valves were swapped to stop the release.

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Eastman makes no representation that it has quantified the number of potential deviations in a manner consistent with how the TCEQ or EPA want them quantified.



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 Federal Operating Permit Deviation Report Form¹
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 30 TAC Chapter 101 Non-Reportable Emission Events

AIR CO RN100219815/RP

Permit Holder Name		Eastman Chemical Company			Customer Number		CN601214406
Area Name		C-5 Ethylene Glycol			Account Number		HH-0042-M
Report Period Start Date	8/1/2015	Report Period End Date	1/31/2016	Operating Permit Number	O1974	Report Submittal Date	2/26/2016

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term and Condition No.	Pollutant	Regulatory Requirement Citation	Type of Rqmt	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
PROEOEG1	N/A	STC-12	VOC	NSR 49363, SC1	ST	N/A	N/A	N/A

Dev Item No	Deviation Period				No. of Devs ²	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
2116	08/11/2015	12:03	08/11/2015	12:07	1	The EO-EG Plant No. 1 residual gas compressor was inadvertently shut down and the system vented to the atmosphere while performing routine instrument maintenance, which resulted in excess air emissions of 9 lbs ethylene and less than 1 lb ethylene oxide.	The residual gas compressor was restarted immediately to stop the release.
2214	11/10/2015	20:50	11/13/2015	13:00	1	A pinhole leak was discovered on a piece of instrument tubing that resulted in excess air emissions of 3 lbs VOC and less than 1 lb argon.	The leaking tubing was repaired to stop the release.

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AIR CO RN100219815/RP

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Area Name		C-5 Ethylene Glycol			Account Number		HH-0042-M
Report Period Start Date	8/1/2015	Report Period End Date	1/31/2016	Operating Permit Number	O1974	Report Submittal Date	2/26/2016

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term and Condition No.	Pollutant	Regulatory Requirement Citation	Type of Rqmt	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
PROES1	N/A	STC-12	VOC	NSR 52985, SC1	ST	N/A	N/A	N/A

Dev Item No	Deviation Period				No. of Devs ²	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			

2137	09/26/2015	12:40	09/26/2015	12:45	1	While preparing to prime the ethylene oxide (EO) feed pumps to Eastman Solvents Plant 1, the discharge bleed valves did not seat properly and EO was released. Estimated excess air emissions were 4 lbs VOC.	The bleed valves were isolated to stop the release.
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Area Name		C-5 Ethylene Glycol			Account Number		HH-0042-M
Report Period Start Date	8/1/2015	Report Period End Date	1/31/2016	Operating Permit Number	O1974	Report Submittal Date	2/26/2016

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term and Condition No.	Pollutant	Regulatory Requirement Citation	Type of Rqmt	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
PROEOEG2	N/A	STC-13	VOC	NSR 1329, SC1	ST	N/A	N/A	N/A

Dev Item No	Deviation Period				No. of Devs ²	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
2272	01/24/2016	22:36	01/27/2016	11:30	1	The vapor recovery unit (VRU) stopped functioning, preventing the return loop from the EOEG Plant 2 analyzer house from being returned to the process and instead was vented to the air. This resulted in excess air emissions of approximately 55 lb ethylene, 8 lb argon and 4 lb VOC.	The VRU was restarted, and the analyzer house return loop was re-directed to the process.

Total Deviations

5

Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?

Yes No

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