

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY

SITE OPERATING PERMIT (SOP) RENEWAL

Permit #:	O1973	Company:	Eastman Chemical Company
Project #:	19672	Site:	Eastman Chemical Texas Operations
Account #:	HH-0042-M	Application Area:	U4 - HCC - 4 Olefin
Regulated Entity #:	RN100219815	Customer #:	CN601214406
Region:	5	County:	Harrison
SIC Code:	2869	SIC Name:	Industrial Organic Chemicals
Permit Reviewer:	Vasant V. Chaphekar, P.E.		

SITE INFORMATION

Physical Location: 300 Kodak Blvd.
Nearest City: Longview
Major Pollutants: VOC, SO₂, PM, NO_x, HAPs, CO
Additional FOPs: O1436, O1968, O1970, O1971, O1972, O1974, O1975, O1976, O1977, O1978, O1979, O1981, O1982

PROJECT SUMMARY

Eastman Chemical Company, Texas Operations, is an industrial organic chemicals facility that is subject to both state and federal applicable requirements, including 30 TAC Chapter 122. The site is operating under Federal Operating Permit (FOP) which expires on 01/12/2014. A timely application for renewal of FOP was received by TCEQ on 06/20/2013. All units addressed in this application area, HCC-4 Olefin Plant, are in compliance with all their respective applicable requirements. The FOP includes general and special terms and conditions and unit-specific applicable requirements which were identified using information provided by the applicant in various forms (OP-SUMR, OP-REQ1, OP-REQ2, and various Unit Attribute forms). Renewal application includes 246 changes (adds, deletes, and modifications) to various emission units and 244 changes (adds, deletes, and modifications) to permit shields.

PROCESS DESCRIPTION

The HCC-4 Olefin application area consists of one plant - Hydrocarbon Cracking Plant No. 4. At this plant ethylene, propylene, hydrogen and co-products are manufactured from liquefied petroleum gas (LPG) in a continuous process. The major process steps include feedstock storage, pyrolysis cracking, waste heat recovery and quench, separation and product storage. Emissions are from process heaters, boilers, process tanks, reactors, distillation units and storage tanks. There are also fugitive equipment leaks, heat exchanger leaks and wastewater. Control devices are flares. The main pollutants are VOC, HAP, PM, CO, NO_x and SO_x.

TECHNICAL REVIEW

Permit Content Summary

1. Was Periodic Monitoring (PM) required and included in the permit?..... Yes
2. Was Compliance Assurance Monitoring (CAM) required and included in the permit?..... No
3. Was case-by-case PM or CAM included in the permit?..... No
4. Was a permit shield requested?..... Yes
5. If a permit shield was requested, was any permit shield request denied?.....No

6. Identify if the following are applicable for this project:
 - (a) Manually-built applicable requirements..... No
 - (b) Customized Special Terms and Conditions..... Yes
 - (c) Manual changes to the IMS-generated applicable requirements..... No
 - (d) Alternate means of compliance for any emission unit/source at the site..... No
7. Is the site subject to the requirements of 40 CFR Part 72 (Acid Rain Permit)?..... No
8. Did the applicant's review/comments on the working draft permit result in changes to the permit content?..... Yes
9. Will the draft permit be sent to public notice with unresolved issues (i.e., disagreements with applicant)?..... No

Permit reviewer notes:

This FOP renewal project was assigned to the permit reviewer on 07/02/2013. An acknowledgement e-mail was sent to applicant on 07/02/2013.

Customized special term and condition for cross referencing 30 TAC 113 and 40 CFR 63, Subpart DDDDD is added. Unit OL225FL1 is revised and now has applicability to 40 CFR Part 63, Subpart A regulation. A previously generated non-applicability determination for this unit was manually deleted on the permit side. Since RRT for MACT YY is not developed, applicant approved inclusion of high level citations in FOP for 16 units subject to these regulations. Detailed MACT YY citations submitted by the applicant on an OP-REQ3 form establish the provisional requirements for these units.

Ethylene cracking furnace units OL229H100, OL229H101, OL229H102, OL229H103, OL229H104, OL229H105, and OL229H106 have a permit shield for MACT DDDDD since they are an affected source under MACT YY. However, MACT YY does not contain any specific applicable requirements that are applicable to ethylene cracking furnaces.

Although applicant submitted OP-MON forms, all periodic monitoring (PM) requirements remained unchanged and are carried over from current FOP. The IBR table submitted by applicant was reviewed and approved by Dana Poppa-Vermillion, P.E.

A working draft permit (WDP) was generated and sent to the applicant for review on 10/08/2013. After making a few changes a revised WDP was reviewed and approved by the applicant on 10/22/2013.

While processing this renewal application, several discrepancies (e.g., single PSD permit shared between 2 Title V sites) related to NSR/PSD permits (8539, 9301, 8522, PSDTX332M3) issued to Eastman Chemical Company 'Eastman' (RN100219815) and Westlake Longview Corporation 'Westlake' (RN105138721) were noted. Applicants were advised (via e-mail sent 10/04/2013) to work with TCEQ's Kristi Mills-Jurach, Team Leader, Chemicals Section, to resolve the discrepancies. This matter is still pending as of 12/04/2013.

Statement of Basis

A Statement of Basis sets forth the legal and factual basis for the applicable requirements that are included in the FOP.

1. The Statement of Basis was prepared on 12/02/2013.
2. The Statement of Basis GroupWise Document # (OPDP Database) is 69617.

Compliance History Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on 12/02/2013.
2. The compliance history review evaluated the period from 06/18/2008 to 06/18/2013.
 Site rating: 0.87 Company rating: 0.59

(High < 0.10; Satisfactory > 0.10 and < 55; Unsatisfactory > 55)

3. Has the permit changed on the basis of the compliance history or site/company rating?..... No

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS?..... No

2. Is a compliance plan and schedule included in the permit?..... No

Delinquent Fee Check

1. The delinquent fee check was performed on 12/02/2013.

2. Were there any delinquent fees owed? No

Public Notice Information

1. Were comments received from the applicant after the draft permit was mailed and before Public Notice was published?..... No

2. Was a revised draft permit or public notice authorization package (PN-Errata) sent for any reason?..... No

3. Publication date: 12/31/2013 Newspaper name: Longview News Journal

4. Was bilingual public notice published?..... Yes

Publication date: 01/08/2014 Newspaper name: La Opinion

5. Were comments received during Public Notice period?..... No

(a) Was a public hearing requested?..... No

(b) Was a public hearing held?..... No

(c) Was the public hearing request withdrawn?..... No

(d) Was permit content changed as a result of any public comments?..... No

6. Was re-publication necessary?..... No

EPA Review

1. Did EPA comment on the draft permit?..... No

2. Was a separate NOPP - Notice of Proposed Permit sent to the EPA?..... No

If yes, did the EPA comment on the proposed permit?..... No

3. Were any changes made to the permit after the EPA Review Period?..... No

If yes, were these changes made within the 60 day Public Petition Period?..... No

IMPORTANT MILESTONES

Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	06/20/2013	
Date Project Received by Engineer	07/02/2013	
Technical Review Period	07/02/2013	10/22/2013
Working Draft Permit Reviewed by Applicant	10/08/2013	10/22/2013
Date PNAP/Draft Permit Mailed	12/05/2013	
Public Notice Comment Period	12/31/2013	02/07/2014
EPA Review Period	01/07/2014	02/21/2014
Date Sign Posting Certification Received	02/18/2014	

EFFECTIVE PERMIT ISSUANCE DATE: 03/10/2014

Vasant V. Chaphekar, P.E. Date
Permit Reviewer
Operating Permits Section
Air Permits Division

Julie Guthrie Date
Team Leader
Operating Permits Section
Air Permit Division

CONTACT INFORMATION

Responsible Official:

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