

## PUBLIC NOTICE

**Eastman Chemical Company** has applied to the Tennessee Department of Environment and Conservation, Division of Air Pollution Control for renewal of a major source (Title V) operating permit subject to the provisions of Tennessee Air Pollution Control Regulations 1200-03-09-.02(11). A major source operating permit is required by both the Federal Clean Air Act and Tennessee's air pollution control regulations. The Title V operating permit is identified as follows: Division identification number 82-0003/576931 – MSOP-34.

EPA has agreed to treat this draft Part 70 permit as a proposed Part 70 permit and to perform its 45-day review provided by the law concurrently with the public notice period. If any substantive comments are received, EPA's 45-day review period will cease to be performed concurrently with the public notice period. EPA's 45-day review period will start once the public notice period has been completed and EPA receives notification from the Tennessee Air Pollution Control Division that comments have been received and resolved. Whether EPA's 45-day review period is performed concurrently with the public comment period or after the public comment period has ended, the deadline for citizen's petitions to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended (*i.e.*, sequentially). The status regarding EPA's 45-day review of these permits and the deadline for submitting a citizen's petition can be found at the following website address:

<http://www2.epa.gov/caa-permitting/caa-permitting-epas-southeastern-region>

Copies of the application materials and draft permits are available for public inspection during normal business hours at the following locations:

TDEC Division of Air Pollution Control  
Johnson City Environmental Field Office  
2305 Silverdale Road,  
Johnson City, TN 37601

and

TDEC Division of Air Pollution Control  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 15th Floor  
Nashville, Tennessee 37243

Electronic copies of the draft permits are available by accessing the TDEC internet site located at:

<http://www.tn.gov/environment/topic/ppo-air>

Questions concerning the source(s) may be addressed to Mr. Travis Blake at (615) 532-0617 or by e-mail at [travis.blake@tn.gov](mailto:travis.blake@tn.gov).

Interested parties are invited to review these materials and comment. In addition, a public hearing may be requested at which written or oral presentations may be made. To be considered, written comments or requests for a public hearing must be received no later than 4:30 PM on **September 14, 2020**. To assure that written comments are received and addressed in a timely manner, written comments must be submitted using one of the following methods:

1. **Mail, private carrier, or hand delivery:** Address written comments to Travis Blake, Division of Air Pollution Control, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue 15<sup>th</sup> Floor, Nashville, Tennessee 37243.
2. **E-mail:** Submit electronic comments to [air.pollution.control@tn.gov](mailto:air.pollution.control@tn.gov).

A final determination will be made after weighing all relevant comments.

Individuals with disabilities who wish to review information maintained at the above-mentioned depositories should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such review. Such contact may be in person, by writing, telephone, or other means, and should be made no less than ten days prior to the end of the public comment period to allow time to provide such aid or services. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue 2<sup>nd</sup> Floor, Nashville, TN 37243, (866) 253-5827. Hearing impaired callers may use the Tennessee Relay Service, (800) 848-0298.

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For the Sullivan County "Kingsport Times-News" -- publish once during the time period of August 10, 2020 through August 14, 2020.

Air Pollution Control      DATE: JULY 30, 2020  
Assigned to –Travis Blake

**No alterations to the above are allowed:**

**Eastman Chemical Company must pay to place this advertisement in the newspaper**

Air Pollution Control must be furnished with an affidavit from the newspaper stating that the ad was run and the date of the ad or one complete sheet from the newspaper showing this advertisement, the name of the newspaper and the date of publication. Mail to Travis Blake, Division of Air Pollution Control, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue 15<sup>th</sup> Floor, Nashville, Tennessee 37243.

STATE OF TENNESSEE  
AIR POLLUTION CONTROL BOARD  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
NASHVILLE, TENNESSEE 37243



**OPERATING PERMIT (TITLE V) Issued Pursuant to Tennessee Air Quality Act**

This permit fulfills the requirements of Title V of the Federal Clean Air Act (42 U.S.C. 7661a-7661e) and the federal regulations promulgated thereunder at 40 CFR Part 70. (FR Vol. 57, No. 140, Tuesday, July 21, 1992 p.32295-32312). This permit is issued in accordance with the provisions of Tennessee Air Pollution Control Regulations (TAPCR) 1200-03-09-.02(11). The permittee has been granted permission to operate an air contaminant source in accordance with emissions limitations and monitoring requirements set forth herein.

Issue Date: \*\*\*\*\*DRAFT\*\*\*\*\*

Permit Number: 576931

Expiration Date: \*\*\*\*\*DRAFT\*\*\*\*\*

Issued To:  
Eastman Chemical Company  
Tennessee Operations  
P.O. Box 511  
Kingsport, TN 37662

Installation Address:  
  
200 South Wilcox Drive  
Kingsport

Installation Description: **MSOP-34 Chemical Manufacturing**

ESRN	PES	Description
82-0003-293	B-232-1	Manufacture of Aromatic Acids
82-0003-84	B-309-2	Cooling Towers

Emission Source Reference No.: **82-0003 MSOP-34**

Renewal Application Due Date: **Between \*\*\*\*\* and \*\*\*\*\***

Primary SIC: 28

Information Relied Upon: **Renewal application dated May 23, 2019 and revisions dated July 8, 2019.**

(continued on the next page)

\_\_\_\_\_  
TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

**POST AT INSTALLATION ADDRESS**

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## CONTENTS

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### SECTION A

---

#### GENERAL PERMIT CONDITIONS

---

A1.	Definitions	1
A2.	Compliance requirement	1
A3.	Need to halt or reduce activity	1
A4.	The permit	1
A5.	Property rights	1
A6.	Submittal of requested information	1
A7.	Severability clause	1
A8.	Fee payment	2
A9.	Permit revision not required	2
A10.	Inspection and entry	2
A11.	Permit shield	3
A12.	Permit renewal and expiration	3
A13.	Reopening for cause	4
A14.	Permit transference	5
A15.	Air pollution alert	5
A16.	Construction permit required	5
A17.	Notification of changes	5
A18.	Schedule of compliance	5
A19.	Title VI	5
A20.	112 (r)	6

---

### SECTION B

#### GENERAL CONDITIONS for MONITORING, REPORTING, and ENFORCEMENT

---

B1.	Recordkeeping	7
B2.	Retention of monitoring data	7
B3.	Reporting	7
B4.	Certification	7
B5.	Annual compliance certification	7
B6.	Submission of compliance certification	8
B7.	Emergency provisions	8
B8.	Excess emissions reporting	9
B9.	Malfunctions, startups and shutdowns - reasonable measures required	9
B10.	Reserved.	9
B11.	Report required upon the issuance of notice of violation	10

---

---

## CONTENTS

---

### SECTION C

---

#### PERMIT CHANGES

---

<b>C1.</b>	<b>Operational flexibility changes</b>	<b>11</b>
<b>C2.</b>	<b>Section 502(b)(10) changes</b>	<b>11</b>
<b>C3.</b>	<b>Administrative amendment</b>	<b>11</b>
<b>C4.</b>	<b>Minor permit modifications</b>	<b>12</b>
<b>C5.</b>	<b>Significant permit modifications</b>	<b>12</b>
<b>C6.</b>	<b>New construction or modifications</b>	<b>12</b>

---

### SECTION D

---

#### GENERAL APPLICABLE REQUIREMENTS

---

<b>D1.</b>	<b>Visible emissions</b>	<b>13</b>
<b>D2.</b>	<b>General provisions and applicability for non-process gaseous emissions</b>	<b>13</b>
<b>D3.</b>	<b>Non-process emission</b>	<b>13</b>
<b>D4.</b>	<b>General provisions and applicability for process gaseous emissions</b>	<b>13</b>
<b>D5.</b>	<b>Particulate emissions from process emission sources</b>	<b>13</b>
<b>D6.</b>	<b>Sulfur dioxide emission standards</b>	<b>13</b>
<b>D7.</b>	<b>Fugitive dust</b>	<b>13</b>
<b>D8.</b>	<b>Open burning</b>	<b>14</b>
<b>D9.</b>	<b>Asbestos</b>	<b>14</b>
<b>D10.</b>	<b>Annual certification of compliance</b>	<b>14</b>
<b>D11.</b>	<b>Emission standards for hazardous air pollutants</b>	<b>14</b>
<b>D12.</b>	<b>Standards of performance for new stationary sources</b>	<b>14</b>
<b>D13.</b>	<b>Gasoline dispensing facilities</b>	<b>14</b>
<b>D14.</b>	<b>Internal combustion engines</b>	<b>14</b>

---

---

## CONTENTS

---

### SECTION E

#### SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDKEEPING and REPORTING REQUIREMENTS

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<b>E1</b>	<b>Fee payment</b>	<b>15</b>
<b>E2-1</b>	<b>Reporting requirements</b>	<b>17</b>
	(a) Semiannual reports	
	(b) Annual compliance certification	
<b>E2-2</b>	<b>Conservation Vent Maintenance</b>	<b>19</b>
<b>E2-3</b>	<b>Visible Emissions Evaluation: General Requirements</b>	<b>19</b>
<b>E2-4</b>	<b>Identification of Responsible Official, Technical Contact, and Billing Contact</b>	<b>19</b>
<b>E2-5</b>	<b>New Source Performance Standards (40 CFR Part 60)</b>	<b>20</b>
<b>E2-6</b>	<b>National Emission Standards for Hazardous Air Pollutants for Source Categories (40 CFR Part 63)</b>	<b>20</b>
<b>E2-7</b>	<b>Emissions Inventory Requirements (State-Only)</b>	<b>21</b>
<b>E3-1</b>	<b>Manufacture of Aromatic Acids (82-0003-293, PES B-232-1)</b>	<b>22</b>
<b>E4-1</b>	<b>Cooling Towers (82-0003-84, PES B-309-2).</b>	<b>27</b>
<b>Table Notes</b>		<b>28</b>

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**END OF PERMIT NUMBER 576931**

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<b>ATTACHMENT 1</b>	<b>Opacity Matrix Decision Tree for Visible Emission Evaluation by EPA Method 9, dated September 11, 2013</b>
<b>ATTACHMENT 2</b>	<b>Specific Applicability Determinations for 40 CFR 60 (NSPS) and 40 CFR 63 (MACT) to MSOP-34</b>
<b>ATTACHMENT 3</b>	<b>Compliance Assurance Monitoring (CAM) Plan for MSOP-34</b>
<b>ATTACHMENT 4</b>	<b>Agreement Letter Dated February 7, 2020</b>
<b>ATTACHMENT 5</b>	<b>Title V Fee Selection Form APC 36 (CN-1583)</b>

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## SECTION A

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# GENERAL PERMIT CONDITIONS

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A permit issued under the provisions of paragraph 1200-03-09-.02(11) is a permit issued pursuant to the requirements of Title V of the Federal Act and its implementing Federal regulations promulgated at 40 CFR, Part 70.

- A1. Definitions.** Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

TAPCR 1200-03

- A2. Compliance requirement.** All terms and conditions in a permit issued pursuant to paragraph 1200-03-09-.02(11) including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act.

The permittee shall comply with all conditions of its permit. Except for requirements specifically designated herein as not being federally enforceable (State Only), non-compliance with the permit requirements is a violation of the Federal Act and the Tennessee Air Quality Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Non-compliance with permit conditions specifically designated herein as not being federally enforceable (State Only) is a violation of the Tennessee Air Quality Act and may be grounds for these actions.

TAPCR 1200-03-09-.02(11)(e)2(i) and 1200-03-09-.02(11)(e)1(vi)(I)

- A3. Need to halt or reduce activity.** The need to halt or reduce activity is not a defense for noncompliance. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this item shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations.

TAPCR 1200-03-09-.02(11)(e)1(vi)(II)

- A4. The permit.** The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

TAPCR 1200-03-09-.02(11)(e)1(vi)(III)

- A5. Property rights.** The permit does not convey any property rights of any sort, or any exclusive privilege.

TAPCR 1200-03-09-.02(11)(e)1(vi)(IV)

- A6. Submittal of requested information.** The permittee shall furnish to the Technical Secretary, within a reasonable time, any information that the Technical Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or termination of the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Technical Secretary copies of records required to be kept by the permit. If the permittee claims that such information is confidential, the Technical Secretary may review that claim and hold the information in protected status until such time that the Board can hear any contested proceedings regarding confidentiality disputes. If the information is desired by EPA, the permittee may mail the information directly to EPA. Any claims of confidentiality for federal purposes will be determined by EPA.

TAPCR 1200-03-09-.02(11)(e)1(vi)(V)

- A7. Severability clause.** The requirements of this permit are severable. A dispute regarding one or more requirements of this permit does not invalidate or otherwise excuse the permittee from their duty to comply with the remaining portion of the permit.

TAPCR 1200-03-09.02(11)(e)1(v)

**A8. Fee payment.**

- (a) The permittee shall pay an annual Title V emission fee based upon the responsible official's choice of actual emissions, allowable emissions, or a combination of actual and allowable emissions; and on the responsible official's choice of annual accounting period. An emission cap of 4,000 tons per year per regulated pollutant per major source SIC Code shall apply to actual or allowable based emission fees. A Title V annual emission fee will not be charged for emissions in excess of the cap. Title V annual emission fees will not be charged for carbon monoxide or for greenhouse gas pollutants solely because they are greenhouse gases.
- (b) Title V sources shall pay allowable based emission fees until the beginning of the next annual accounting period following receipt of their initial Title V operating permit. At that time, the permittee shall begin paying their Title V fee based upon their choice of actual or allowable based fees, or mixed actual and allowable based fees. Once permitted, the Responsible Official may revise their existing fee choice by submitting a written request to the Division no later than December 31 of the annual accounting period for which the fee is due.
- (c) When paying annual Title V emission fees, the permittee shall comply with all provisions of 1200-03-26-.02 and 1200-03-09-.02(11) applicable to such fees.
- (d) Where more than one allowable emission limit is applicable to a regulated pollutant, the allowable emissions for the regulated pollutants shall not be double counted. Major sources subject to the provisions of paragraph 1200-03-26-.02(9) shall apportion their emissions as follows to ensure that their fees are not double counted.
1. Sources that are subject to federally promulgated hazardous air pollutant under 40 CFR 60, 61, or 63 will place such regulated emissions in the regulated hazardous air pollutant (HAP) category.
  2. A category of miscellaneous HAPs shall be used for hazardous air pollutants listed at part 1200-03-26-.02(2)(i)12 that are not subject to federally promulgated hazardous air pollutant standards under 40 CFR 60, 61, or 63.
  3. HAPs that are also in the family of volatile organic compounds, particulate matter, or PM<sub>10</sub> shall not be placed in either the regulated HAP category or miscellaneous HAP category.
  4. Sources that are subject to a provision of chapter 1200-03-16 New Source Performance Standards (NSPS) or chapter 0400-30-39 Standards of Performance for New Stationary Sources for pollutants that are neither particulate matter, PM<sub>10</sub>, sulfur dioxide (SO<sub>2</sub>), volatile organic compounds (VOC), nitrogen oxides (NO<sub>x</sub>), or hazardous air pollutants (HAPs) will place such regulated emissions in an NSPS pollutant category.
  5. The regulated HAP category, the miscellaneous HAP category, and the NSPS pollutant category are each subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).
  6. Major sources that wish to pay annual emission fees for PM<sub>10</sub> on an allowable emission basis may do so if they have a specific PM<sub>10</sub> allowable emission standard. If a major source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM<sub>10</sub> emission basis, it may do so if the PM<sub>10</sub> actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM<sub>10</sub> emission levels must be made as part of the source's major source operating permit in advance in order to exercise this option. The PM<sub>10</sub> emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) shall also apply to PM<sub>10</sub> emissions.

TAPCR 1200-03-26-.02 and 1200-03-09-.02(11)(e)1(vii)

- A9. Permit revision not required.** A permit revision will not be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or process for changes that are provided for in the permit.

TAPCR 1200-03-09-.02(11)(e)1(viii)

- A10. Inspection and entry.** Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Technical Secretary or an authorized representative to perform the following for the purposes of determining compliance with the permit applicable requirements:

- (a) Enter upon, at reasonable times, the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by the Clean Air Act and Chapter 1200-03-10 of TAPCR, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
- (e) "Reasonable times" shall be considered to be customary business hours unless reasonable cause exists to suspect noncompliance with the Act, Division 1200-03 or any permit issued pursuant thereto and the Technical Secretary specifically authorizes an inspector to inspect a facility at any other time.

TAPCR 1200-03-09-.02(11)(e)3.(ii)

**A11. Permit shield.**

- (a) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance, provided that:
  - 1. Such applicable requirements are included and are specifically identified in the permit; or
  - 2. The Technical Secretary, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- (b) Nothing in this permit shall alter or affect the following:
  - 1. The provisions of section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section. Similarly, the provisions of T.C.A. §68-201-109 (emergency orders) including the authority of the Governor under the section;
  - 2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - 3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Federal Act; or
  - 4. The ability of EPA to obtain information from a source pursuant to section 114 of the Federal Act.
- (c) Permit shield is granted to the permittee.

TAPCR 1200-03-09-.02(11)(e)6

**A12. Permit renewal and expiration.**

- (a) An application for permit renewal must be submitted at least 180 days, but no more than 270 days prior to the expiration of this permit. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted.
- (b) If the permittee submits a timely and complete application for permit renewal the source will not be considered to be operating without a permit until the Technical Secretary takes final action on the permit application, except as otherwise noted in paragraph 1200-03-09-.02(11).
- (c) This permit, its shield provided in Condition A11, and its conditions will be extended and effective after its expiration date provided that the source has submitted a timely, complete renewal application to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)2 and 3, 1200-03-09-.02(11)(d)1(i)(III), and 1200-03-09-.02(11)(a)2

**A13. Reopening for cause.**

- (a) A permit shall be reopened and revised prior to the expiration of the permit under any of the circumstances listed below:
1. Additional applicable requirements under the Federal Act become applicable to the sources contained in this permit provided the permit has a remaining term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the permit expiration date of this permit, unless the original has been extended pursuant to 1200-03-09-.02(11)(a)2.
  2. Additional requirements become applicable to an affected source under the acid rain program.
  3. The Technical Secretary or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
  4. The Technical Secretary or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (b) Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable.
- (c) Reopenings for cause shall not be initiated before a notice of such intent is provided to the permittee by the Technical Secretary at least 30 days in advance of the date that the permit is to be reopened except that the Technical Secretary may provide a shorter time period in the case of an emergency. An emergency shall be established by the criteria of T.C.A. 68-201-109 or other compelling reasons that public welfare is being adversely affected by the operation of a source that is in compliance with its permit requirements.
- (d) If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit as identified in A13, he is required under federal rules to notify the Technical Secretary and the permittee of such findings in writing. Upon receipt of such notification, the Technical Secretary shall investigate the matter in order to determine if he agrees or disagrees with the Administrator's findings. If he agrees with the Administrator's findings, the Technical Secretary shall conduct the reopening in the following manner:
1. The Technical Secretary shall, within 90 days after receipt of such notification, forward to EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate. If the Administrator grants additional time to secure permit applications or additional information from the permittee, the Technical Secretary shall have the additional time period added to the standard 90 day time period.
  2. EPA will evaluate the Technical Secretary's proposed revisions and respond as to their evaluation.
  3. If EPA agrees with the proposed revisions, the Technical Secretary shall proceed with the reopening in the same manner prescribed under Condition A13 (b) and Condition A13 (c).
  4. If the Technical Secretary disagrees with either the findings or the Administrator that a permit should be reopened or an objection of the Administrator to a proposed revision to a permit submitted pursuant to Condition A13(d), he shall bring the matter to the Board at its next regularly scheduled meeting for instructions as to how he should proceed. The permittee shall be required to file a written brief expressing their position relative to the Administrator's objection and have a responsible official present at the meeting to answer questions for the Board. If the Board agrees that EPA is wrong in their demand for a permit revision, they shall instruct the Technical Secretary to conform to EPA's demand, but to issue the permit under protest preserving all rights available for litigation against EPA.

TAPCR 1200-03-09-.02(11)(f)6 and 7.

**A14. Permit transference.** An administrative permit amendment allows for a change of ownership or operational control of a source where the Technical Secretary determines that no other change in the permit is necessary, provided that the following requirements are met:

- (a) Transfer of ownership permit application is filed consistent with the provisions of 1200-03-09-.03(6), and
- (b) written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)4(i)(IV) and 1200-03-09-.03(6)

**A15. Air pollution alert.** When the Technical Secretary has declared that an air pollution alert, an air pollution warning, or an air pollution emergency exists, the permittee must follow the requirements for that episode level as outlined in TAPCR 1200-03-09-.03(1) and TAPCR 1200-03-15-.03.

**A16. Construction permit required.** Except as exempted in TAPCR 1200-03-09-.04, or excluded in subparagraph TAPCR 1200-03-02-.01(1)(aa) or subparagraph TAPCR 1200-03-02-.01(1)(cc), this facility shall not begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit for the construction or modification of such air contaminant source.

TAPCR 1200-03-09-.01(1)(a)

**A17. Notification of changes.** The permittee shall notify the Technical Secretary 30 days prior to commencement of any of the following changes to an air contaminant source which would not be a modification requiring a construction permit.

- (a) change in air pollution control equipment
- (b) change in stack height or diameter
- (c) change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

TAPCR 1200-03-09-.02(7)

**A18. Schedule of compliance.** The permittee will comply with any applicable requirement that becomes effective during the permit term on a timely basis. If the permittee is not in compliance the permittee must submit a schedule for coming into compliance which must include a schedule of remedial measure(s), including an enforceable set of deadlines for specific actions.

TAPCR 1200-03-09-.02(11)(d)3 and 40 CFR Part 70.5(c)

**A19. Title VI.**

(a) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.
2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to Section 82.158.
3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.

(b) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

(c) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program(SNAP) promulgated pursuant to 40 CFR, Part 82, Subpart G, Significant New Alternatives Policy Program.

**A20.** **112 (r).** Sources which are subject to the provisions of Section 112(r) of the federal Clean Air Act or any federal regulations promulgated thereunder, shall annually certify in writing to the Technical Secretary that they are properly following their accidental release plan. The annual certification is due in the office of the Technical Secretary no later than January 31 of each year. Said certification will be for the preceding calendar year. TAPCR 1200-03-32-.03(3)

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**SECTION B**

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**GENERAL CONDITIONS for MONITORING,  
REPORTING, and ENFORCEMENT**

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**B1. Recordkeeping.** Monitoring and related record keeping shall be performed in accordance with the requirements specified in the permit conditions for each individual permit unit. In no case shall reports of any required monitoring and record keeping be submitted less frequently than every six months.

(a) Where applicable, records of required monitoring information include the following:

1. The date, place as defined in the permit, and time of sampling or measurements;
2. The date(s) analyses were performed;
3. The company or entity that performed the analysis;
4. The analytical techniques or methods used;
5. The results of such analyses; and
6. The operating conditions as existing at the time of sampling or measurement.

(b) Digital data accumulation which utilizes valid data compression techniques shall be acceptable for compliance determination as long as such compression does not violate an applicable requirement and its use has been approved in advance by the Technical Secretary.

TAPCR 1200-03-09-.02(11)(e)1(iii)

**B2. Retention of monitoring data.** The permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

TAPCR 1200-03-09-.02(11)(e)1(iii)(II)II

**B3. Reporting.** Reports of any required monitoring and record keeping shall be submitted to the Technical Secretary in accordance with the frequencies specified in the permit conditions for each individual permit unit. Reports shall be submitted within 60 days of the close of the reporting period unless otherwise noted. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. Reports required under "State only requirements" are not required to be certified by a responsible official.

TAPCR 1200-03-09-.02(11)(e)1(iii)

**B4. Certification.** Except for reports required under "State Only" requirements, any application form, report or compliance certification submitted pursuant to the requirements of this permit shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

TAPCR 1200-03-09-.02(11)(d)4

**B5. Annual compliance certification.** The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

(a) The identification of each term or condition of the permit that is the basis of the certification;

(b) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;

(c) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in B5(b) above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion\* or exceedance\*\* as defined below occurred; and

(d) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

\* “Excursion” shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

\*\* “Exceedance” shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667

**B6. Submission of compliance certification.** The compliance certification shall be submitted to:

The Tennessee Department of Environment and Conservation specified in Section E of this permit	and	Air Enforcement Branch U. S. EPA Region IV 61 Forsyth Street, SW Atlanta, Georgia 30303
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TAPCR 1200-03-09-.02(11)(e)3(v)(IV)

**B7. Emergency provisions.** An emergency constitutes an affirmative defense to an enforcement action brought against this source for noncompliance with a technology based emission limitation due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(a) The affirmative defense of the emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An emergency occurred and that the permittee can identify the probable cause(s) of the emergency. "Probable" must be supported by a credible investigation into the incident that seeks to identify the causes and results in an explanation supported by generally accepted engineering or scientific principles.
2. The permitted source was at the time being properly operated. In determining whether or not a source was being properly operated, the Technical Secretary shall examine the source's written standard operating procedures which were in effect at the time of the noncompliance and any other code as detailed below that would be relevant to preventing the noncompliance. Adherence to the source's standard operating procedures will be the test of adequate preventative maintenance, careless operation, improper operation or operator error to the extent that such adherence would prevent noncompliance. The source's failure to follow recognized standards of practice to the extent that adherence to such a standard would have prevented noncompliance will disqualify the source from any claim of an emergency and an affirmative defense.
3. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
4. The permittee submitted notice of the emergency to the Technical Secretary according to the notification criteria for malfunctions in rule 1200-03-20-.03. For the purposes of this condition, "emergency" shall be substituted for "malfunction(s)" in rule 1200-03-20-.03 to determine the relevant notification threshold. The notice shall include a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

- (b) In any enforcement proceeding the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (c) The provisions of this condition are in addition to any emergency, malfunction or upset requirement contained in Division 1200-03 or other applicable requirement.

TAPCR 1200-03-09-.02(11)(e)7

**B8. Excess emissions reporting.**

- (a) The permittee shall promptly notify the Technical Secretary when any emission source, air pollution control equipment, or related facility breaks down in such a manner to cause the emission of air contaminants in excess of the applicable emission standards contained in Division 1200-03 or any permit issued thereto, or of sufficient duration to cause damage to property or public health. The permittee must provide the Technical Secretary with a statement giving all pertinent facts, including the estimated duration of the breakdown. Violations of the visible emission standard which occur for less than 20 minutes in one day (midnight to midnight) need not be reported. Prompt notification will be within 24 hours of the malfunction and shall be provided by telephone to the Division's Nashville office. The Technical Secretary shall be notified when the condition causing the failure or breakdown has been corrected. In attainment and unclassified areas if emissions other than from sources designated as significantly impacting on a nonattainment area in excess of the standards will not and do not occur over more than a 24-hour period (or will not recur over more than a 24-hour period) and no damage to property and or public health is anticipated, notification is not required.
- (b) Any malfunction that creates an imminent hazard to health must be reported by telephone immediately to the Division's Nashville office at (615) 532-0554 and to the State Civil Defense.
- (c) A log of all malfunctions, startups, and shutdowns resulting in emissions in excess of the standards in Division 1200-03 or any permit issued thereto must be kept at the plant. All information shall be entered in the log no later than 24 hours after the startup or shutdown is complete, or the malfunction has ceased or has been corrected. Any later discovered corrections can be added in the log as footnotes with the reason given for the change. This log must record at least the following:
  1. Stack or emission point involved
  2. Time malfunction, startup, or shutdown began and/or when first noticed
  3. Type of malfunction and/or reason for shutdown
  4. Time startup or shutdown was complete or time the air contaminant source returned to normal operation
  5. The company employee making entry on the log must sign, date, and indicate the time of each log entry

The information under items 1. and 2. must be entered into the log by the end of the shift during which the malfunction or startup began. For any source utilizing continuous emission(s) monitoring, continuous emission(s) monitoring collection satisfies the above log keeping requirement.

TAPCR 1200-03-20-.03 and .04

- B9. Malfunctions, startups and shutdowns - reasonable measures required.** The permittee must take all reasonable measures to keep emissions to a minimum during startups, shutdowns, and malfunctions. These measures may include installation and use of alternate control systems, changes in operating methods or procedures, cessation of operation until the process equipment and/or air pollution control equipment is repaired, maintaining sufficient spare parts, use of overtime labor, use of outside consultants and contractors, and other appropriate means. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions. This provision does not apply to standards found in 40 CFR, Parts 60 (Standards of performance for new stationary sources), 61 (National emission standards for hazardous air pollutants) and 63 (National emission standards for hazardous air pollutants for source categories).

TAPCR 1200-03-20-.02

- B10. Reserved.**

**B11. Report required upon the issuance of a notice of violation for excess emissions.** The permittee must submit within 20 days after receipt of the notice of violation, the data required below. If this data has previously been available to the Technical Secretary prior to the issuance of the notice of violation no further action is required of the violating source. However, if the source desires to submit additional information, then this must be submitted within the same 20 day time period. The minimum data requirements are:

- (a) The identity of the stack and/or other emission point where the excess emission(s) occurred;
- (b) The magnitude of the excess emissions expressed in pounds per hour and the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
- (c) The time and duration of the emissions;
- (d) The nature and cause of such emissions;
- (e) For malfunctions, the steps taken to correct the situation and the action taken or planned to prevent the recurrence of such malfunctions;
- (f) The steps taken to limit the excess emissions during the occurrence reported, and
- (g) If applicable, documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good operating practices for minimizing emissions.

Failure to submit the required report within the 20 day period specified shall preclude the admissibility of the data for determination of potential enforcement action.

TAPCR 1200-03-20-.06(2), (3) and (4)

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## SECTION C

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### PERMIT CHANGES

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**C1. Operational flexibility changes.** The source may make operational flexibility changes that are not addressed or prohibited by the permit without a permit revision subject to the following requirements:

- (a) The change cannot be subject to a requirement of Title IV of the Federal Act or Chapter 1200-03-30.
- (b) The change cannot be a modification under any provision of Title I of the federal Act or Division 1200-03.
- (c) Each change shall meet all applicable requirements and shall not violate any existing permit term or condition.
- (d) The source must provide contemporaneous written notice to the Technical Secretary and EPA of each such change, except for changes that are below the threshold of levels that are specified in Rule 1200-03-09-.04.
- (e) Each change shall be described in the notice including the date, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change.
- (f) The change shall not qualify for a permit shield under the provisions of part 1200-03-09-.02(11)(e)6.
- (g) The permittee shall keep a record describing the changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. The records shall be retained until the changes are incorporated into subsequently issued permits.

TAPCR 1200-03-09-.02(11)(a)4 (ii)

**C2. Section 502(b)(10) changes.**

- (a) The permittee can make certain changes without requiring a permit revision, if the changes are not modifications under Title I of the Federal Act or Division 1200-03 and the changes do not exceed the emissions allowable under the permit. The permittee must, however, provide the Administrator and Technical Secretary with written notification within a minimum of seven days in advance of the proposed changes. The Technical Secretary may waive the seven-day advance notice in instances where the source demonstrates in writing that an emergency necessitates the change. Emergency shall be demonstrated by the criteria of TAPCR 1200-03-09-.02(11)(e)7 and in no way shall it include changes solely to take advantages of an unforeseen business opportunity. The Technical Secretary and EPA shall attach each such notice to their copy of the relevant permit.
- (b) The written notification must be signed by a facility Title V responsible official and include the following:
  - 1. a brief description of the change within the permitted facility;
  - 2. the date on which the change will occur;
  - 3. a declaration and quantification of any change in emissions;
  - 4. a declaration of any permit term or condition that is no longer applicable as a result of the change; and
  - 5. a declaration that the requested change is not a Title I modification and will not exceed allowable emissions under the permit.
- (c) The permit shield provisions of TAPCR 1200-03-09-.02(11)(e)6 shall not apply to Section 502(b)(10) changes.

TAPCR 1200-03-09-.02(11)(a)4 (i)

**C3. Administrative amendment.**

- (a) Administrative permit amendments to this permit shall be in accordance with 1200-03-09-.02(11)(f)4. The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.

- (b) The permit shield shall be extended as part of an administrative permit amendment revision consistent with the provisions of TAPCR 1200-03-09-.02(11)(e)6 for such revisions made pursuant to item (c) of this condition which meet the relevant requirements of TAPCR 1200-03-09-.02(11)(e), TAPCR 1200-03-09-.02(11)(f) and TAPCR 1200-03-09-.02(11)(g) for significant permit modifications.
- (c) Proceedings to review and grant administrative permit amendments shall be limited to only those parts of the permit for which cause to amend exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)4

**C4. Minor permit modifications.**

- (a) The permittee may submit an application for a minor permit modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(ii).
- (b) The permittee may make the change proposed in its minor permit modification immediately after an application is filed with the Technical Secretary.
- (c) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.
- (d) Minor permit modifications do not qualify for a permit shield.

TAPCR 1200-03-09-.02(11)(f)5(ii)

**C5. Significant permit modifications.**

- (a) The permittee may submit an application for a significant modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(iv).
- (b) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)5(iv)

**C6. New construction or modifications.**

Future construction at this facility that is subject to the provisions of TAPCR 1200-03-09-.01 shall be governed by the following:

- (a) The permittee shall designate in their construction permit application the route that they desire to follow for the purposes of incorporating the newly constructed or modified sources into their existing operating permit. The Technical Secretary shall use that information to prepare the operating permit application submittal deadlines in their construction permit.
- (b) Sources desiring the permit shield shall choose the administrative amendment route of TAPCR 1200-03-09-.02(11)(f)4 or the significant modification route of TAPCR 1200-03-09-.02(11)(f)5(iv).
- (c) Sources desiring expediency instead of the permit shield shall choose the minor permit modification procedure route of TAPCR 1200-03-09-.02(11)(f)5(ii) or group processing of minor modifications under the provisions of TAPCR 1200-03-09-.02(11)(f)5(iii) as applicable to the magnitude of their construction.

TAPCR 1200-03-09-.02(11)(d) 1(i)(V)

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## SECTION D

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### GENERAL APPLICABLE REQUIREMENTS

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- D1. Visible emissions.** With the exception of air emission sources exempt from the requirements of TAPCR 1200-03-05 and air emission sources for which a different opacity standard is specifically provided elsewhere in this permit, the permittee shall not cause, suffer, allow or permit discharge of a visible emission from any air contaminant source with an opacity in excess 20% for an aggregate of more than five minutes in any one hour or more than 20minutes in any 24-hour period; provided, however, that for fuel burning installations with fuel burning equipment of input capacity greater than 600 million Btu per hour, the permittee shall not cause, suffer, allow, or permit discharge of a visible emission from any fuel burning installation with an opacity in excess of 20% (six-minute average) except for one six minute period per one hour of not more than 40% opacity. Sources constructed or modified after July 7, 1992 shall utilize six-minute averaging.

Consistent with the requirements of TAPCR Chapter 1200-03-20, due allowance may be made for visible emissions in excess of that permitted under TAPCR 1200-03-05 which are necessary or unavoidable due to routine startup and shutdown conditions. The facility shall maintain a continuous, current log of all excess visible emissions showing the time at which such conditions began and ended and that such record shall be available to the Technical Secretary or an authorized representative upon request.

TAPCR 1200-03-05-.01(1), TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.02(1)

- D2. General provisions and applicability for non-process gaseous emissions.** Any person constructing or otherwise establishing a non-portable air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize the best equipment and technology currently available for controlling such gaseous emissions.

TAPCR 1200-03-06-.03(2)

- D3. Non-process emission standards.** The permittee shall not cause, suffer, allow, or permit particulate emissions from non-process sources in excess of the standards in TAPCR 1200-03-06.

- D4. General provisions and applicability for process gaseous emissions.** Any person constructing or otherwise establishing an air contaminant source emitting gaseous air contaminants after April 3, 1972 or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize equipment and technology which is deemed reasonable and proper by the Technical Secretary.

TAPCR 1200-03-07-.07(2)

- D5. Particulate emissions from process emission sources.** The permittee shall not cause, suffer, allow, or permit particulate emissions from process sources in excess of the standards in TAPCR 1200-03-07.

- D6. Sulfur dioxide emission standards.** The permittee shall not cause, suffer, allow, or permit Sulfur dioxide emissions from process and non-process sources in excess of the standards in TAPCR 1200-03-14. Regardless of the specific emission standard, new process sources shall utilize the best available control technology as deemed appropriate by the Technical Secretary of the Tennessee Air Pollution Control Board.

- D7. Fugitive Dust.**

(a) The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, but not be limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
2. Application of asphalt, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

(b) The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five minutes per hour or 20 minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in Chapter 1200-03-20.

TAPCR 1200-03-08

**D8. Open burning.** The permittee shall comply with TAPCR 1200-03-04 for all open burning activities at the facility.

TAPCR 1200-03-04

**D9. Asbestos.** Where applicable, the permittee shall comply with the requirements of TAPCR 1200-03-11-.02(2)(d) when conducting any renovation or demolition activities at the facility.

TAPCR 1200-03-11-.02(2)(d) and 40 CFR, Part 61

**D10. Annual certification of compliance.** The generally applicable requirements set forth in Section D of this permit are intended to apply to activities and sources that are not subject to source-specific applicable requirements contained in State of Tennessee and U.S. EPA regulations. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related record keeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)1 and compliance requirements of TAPCR 1200-03-09-.02(11)(e)3.(i). The permittee shall submit compliance certification for these conditions annually.

**D11. Emission Standards for Hazardous Air Pollutants.** When applicable, the permittee shall comply with TAPCR 0400-30-38 for all emission sources subject to a requirement contained therein.

TAPCR 0400-30-38

**D12. Standards of Performance for New Stationary Sources.** When applicable, the permittee shall comply with TAPCR 0400-30-39 for all emission sources subject to a requirement contained therein.

TAPCR 0400-30-39

**D13. Gasoline Dispensing Facilities.** When applicable, the permittee shall comply with TAPCR 1200-03-18-.24 for all emission sources subject to a requirement contained therein.

**D14. Internal Combustion Engines.**

(a) All stationary reciprocating internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-38-.01.

(b) All stationary compression ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-39-.01.

(c) All stationary spark ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-39-.02.

TAPCR 0400-30-38 and 39

## SECTION E

## SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDKEEPING and REPORTING REQUIREMENTS

<b>82-0003 MSOP-34</b>	<b>Facility Description:</b>	Eastman Chemical Company - Tennessee Eastman Division facility in Kingsport manufactures chemicals, fibers, and plastics. The production of aromatic acids in the Polymers Division is identified as MSOP-34 for Title V permitting purposes.
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Conditions E1 through E2 apply to all sources in Section E of this permit unless otherwise noted.

E1. Fee payment

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE <b>82-0003-MSOP-34</b>			
REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
<b>PARTICULATE MATTER (PM)</b>	<b>24.8</b>	<b>AEAR</b>	<b>Includes all fee emissions.</b>
PM <sub>10</sub>	N/A	N/A	
SO <sub>2</sub>	<b>0.06</b>	<b>AEAR</b>	<b>Includes all fee emissions.</b>
VOC	<b>238.52</b>	<b>AEAR</b>	<b>Does not include VOC HAP with a standard.</b>
NO <sub>x</sub>	<b>6.23</b>	<b>AEAR</b>	<b>Includes all fee emissions.</b>
<b>CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAPs WITHOUT A STANDARD)*</b>			
VOC FAMILY GROUP	N/A	N/A	
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	N/A	N/A	
<b>CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAPs WITH A STANDARD)**</b>			
VOC FAMILY GROUP			<b>40 CFR Part 63 Subpart G. Fee emissions are not included in VOC above.</b>
Acetaldehyde	<b>0.88</b>	<b>AEAR</b>	
Benzene	<b>2.27</b>	<b>AEAR</b>	
Methanol	<b>6.16</b>	<b>AEAR</b>	
Methyl Bromide	<b>99.25</b>	<b>AEAR</b>	
Toluene	<b>0.13</b>	<b>AEAR</b>	
m-Xylene	<b>5.3</b>	<b>AEAR</b>	
p-Xylene	<b>41.61</b>	<b>AEAR</b>	
NON-VOC GASEOUS GROUP	N/A	N/A	N/A
PM FAMILY GROUP	N/A	N/A	N/A
<b>CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***</b>			
EACH NSPS POLLUTANT NOT LISTED ABOVE	N/A	N/A	N/A

## NOTES

**AAP** The Annual Accounting Period (AAP) is a 12 consecutive month period that either (a) begins each July 1st and ends June 30<sup>th</sup> of the following year when fees are paid on a fiscal year basis, or (b) begins January 1<sup>st</sup> and ends December 31<sup>st</sup> of the same year when paying on a calendar year basis. The Annual Accounting Period at the time of renewal issuance began **January 1, 2020** and ends **December 31, 2020**. The next Annual Accounting Period begins **January 1, 2021** and ends **December 31, 2021** unless a request to change the annual accounting period is submitted by the responsible official as required by subparagraph 1200-03-26-.02(9)(b) of the TAPCR and approved by the Technical Secretary. If the permittee wishes to revise their annual accounting period or their annual emission fee basis as allowed by subparagraph 1200-03-26-.02(9)(b) of the TAPCR, the responsible official must submit the request to the Division in writing on or before December 31 of the annual accounting period for which the fee is due. If a change in fee basis from allowable emissions to actual emissions for any pollutant is requested, the request from the responsible official must include the methods that will be used to determine actual emissions. Changes in fee bases must be made using the Title V Fee Selection form, form number APC 36 (CN-1583), included as Attachment 5 to this permit and available on the Division of Air Pollution Control's website.

**N/A** N/A indicates that no emissions are specified for fee computation.

**AEAR** If the permittee is paying annual emission fees on an actual emissions basis, **AEAR** indicates that an **Actual Emissions Analysis** is **Required** to determine the actual emissions of:

- (1) **each regulated pollutant** (Particulate matter, SO<sub>2</sub>, VOC, NO<sub>x</sub> and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),
- (2) **each pollutant group** (VOC Family, Non-VOC Gaseous, and Particulate Family),
- (3) the **Miscellaneous HAP Category**,
- (4) the **Specific HAP Category**, and
- (5) the **NSPS Category**

under consideration during the **Annual Accounting Period**.

\* **Category Of Miscellaneous HAP (HAP Without A Standard):** This category is made-up of hazardous air pollutants that do not have a federal or state standard. Each HAP is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, the **Miscellaneous HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

\*\* **Category Of Specific HAP (HAP With A Standard):** This category is made-up of hazardous air pollutants (HAP) that are subject to Federally promulgated Hazardous Air Pollutant Standards that can be imposed under Chapter 1200-03-11 or Chapter 1200-03-31. Each individual hazardous air pollutant is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, each individual hazardous air pollutant of the **Specific HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

\*\*\* **Category Of NSPS Pollutants Not Listed Above:** This category is made-up of each New Source Performance Standard (NSPS) pollutant whose emissions are not included in the **PM, SO<sub>2</sub>, VOC** or **NO<sub>x</sub>** emissions from each source in this permit. **For fee computation**, each **NSPS pollutant not listed above** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

#### END NOTES

- The permittee shall:**
- (1) Pay Title V **annual emission fees**, on the emissions and year bases requested by the responsible official and approved by the Technical Secretary, for each annual accounting period (AAP) by the payment deadline(s) established in TAPCR 1200-03-26-.02(9)(g). Fees may be paid on an **actual, allowable, or mixed** emissions basis; and on either a **state fiscal year** or a **calendar year**, provided the requirements of TAPCR 1200-03-26-.02(9)(b) are met. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8).
  - (2) Sources paying annual emissions fees on an allowable emissions basis: pay annual allowable based emission fees for each annual accounting period no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d).
  - (3) Sources paying annual emissions fees on an actual emissions basis: prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
    - (a) the completed **Fee Emissions Summary Table**,
    - (b) each **actual emissions analysis** required, and
    - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the annual fee basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These

records shall be used to complete the **actual emissions analyses** required by the above **Fee Emissions Summary Table**.

- (4) Sources paying annual emissions fees on a mixed emissions basis: for all pollutants and all sources for which the permittee has chosen an actual emissions basis, prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
  - (a) the completed **Fee Emissions Summary Table**,
  - (b) each **actual emissions analysis** required, and
  - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary’s representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the fee bases approved by the Technical Secretary (payment on an actual or mixed emissions basis) and payment on a state fiscal year (July 1 through June 30) or a calendar year (January 1 through December 31). These records shall be used to complete the **actual emissions analysis**.

For all pollutants and all sources for which the permittee has chosen an allowable emissions basis, pay allowable based emission fees pursuant to TAPCR 1200-03-26-.02(9)(d).

- (5) When paying on an actual or mixed emissions basis, submit the **actual emissions analyses** at the time the fees are paid in full.

The annual emission fee due dates are specified in TAPCR 1200-03-26-.02(9)(g) and are dependent on the Responsible Official’s choice of fee bases as described above. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8). Emissions for regulated pollutants shall not be double counted as specified in Condition A8(d) of this permit.

**Payment of the fee due and the actual emissions analysis (if required) shall be submitted to The Technical Secretary at the following address:**

Payment of Fee to: The Tennessee Department of Environment and Conservation Division of Fiscal Services Consolidated Fee Section – APC William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 10th Floor Nashville, Tennessee 37243	and	Actual Emissions Analyses to: The Tennessee Department of Environment and Conservation Division of Air Pollution Control Emission Inventory Program William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 15th Floor Nashville, Tennessee 37243 or An electronic copy (PDF) of actual emissions analysis can also be submitted to: <a href="mailto:apc.inventory@tn.gov">apc.inventory@tn.gov</a>
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**E2. General Facility Requirements**

**E2-1. Reporting requirements.**

- (a) **Semiannual reports.** Semiannual reports shall cover the six-month periods from **January 1** to **June 30** and from **July 1** through **December 31** and shall be submitted within 60 days after the end of each six-month period. Reports shall be submitted within 60 days after the end of each six-month period. The first semiannual report following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period	Information Required
568170	January 1, 2020 through *****	See Condition E2-1(a) of permit 568170
576931	***** through December 31, 2020	See below

Semiannual reports for this facility (**82-0003-MSOP-34**) shall include:

- (1) Any monitoring and recordkeeping required by Conditions *E3-1, E3-10, and E3-26* of this permit. A summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (2) The MACT reports required by 40 CFR 63 Subpart A, 40 CFR 63 Subpart G, and 40 CFR 63 Subpart H (Condition *E2-6*).

**Note to E2-1(a)(2):** This source is subject to 40 CFR 63 Subpart EEEE (Organic Liquids Distribution NESHAP), but there are no reporting requirements for the sources identified in this permit (transfer racks that only unload organic liquids). Pursuant to §63.2343(a), for each transfer rack subject to Subpart EEEE that only unloads organic liquids (i.e., no organic liquids are loaded at any of the transfer racks), the permittee must keep documentation that verifies that each transfer rack is not required to be controlled. The documentation must be kept up-to-date and must be readily available for expeditious inspection and review according to §63.10(b)(1). The documentation may consist of identification of the transfer racks on a site plan or P&ID.

- (3) The NSPS reports required by 40 CFR 60 Subpart VVa (Condition *E2-5*).
- (4) The visible emission evaluation readings from Condition *E4-1* of this permit if required. A summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance. Per the opacity matrix dated September 11, 2013, no visible emission evaluation readings are required by Condition *E3-5* of this permit.
- (5) Identification of all instances of deviations from ALL PERMIT REQUIREMENTS.

**These reports must be certified by a responsible official consistent with condition B4 of this permit and shall be submitted to The Technical Secretary at the address in Condition E2(b) of this permit.**

TAPCR 1200-03-09-.02(11)(e)1.(iii)

(b) **Annual compliance certification.** The permittee shall submit annually compliance certifications with each term or condition contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

- (1) The identification of each term or condition of the permit that is the basis of the certification;
- (2) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; Such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
- (3) The status of compliance with each term or condition of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in E2(b)2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion\* or exceedance\*\* as defined below occurred; and
- (4) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

\* “Excursion” shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

\*\* “Exceedance” shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission

limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

Annual compliance certifications shall cover the 12-month period from **July 1** of each calendar year to **June 30** of the following calendar year and shall be submitted within 60 days after the end of each 12-month period. The first annual compliance certification following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period
568170	***** through *****
576931	***** through *****

**These certifications shall be submitted to: TN APCD and EPA**

Division of Air Pollution Control  
 William R. Snodgrass Tennessee Tower  
 312 Rosa L. Parks Avenue, 15<sup>th</sup> Floor  
 Nashville, TN 37243  
 e-mail (PDF): [Air.Pollution.Control@tn.gov](mailto:Air.Pollution.Control@tn.gov)

and  
 Air Enforcement Branch  
 U.S. EPA Region IV  
 61 Forsyth Street, SW  
 Atlanta, Georgia 30303

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667  
 TAPCR 1200-03-09-.02(11)(e)3.(v)

(c) **Retention of Records** All records required by any condition in Section E of this permit must be retained for a period of not less than five years. Additionally, these records shall be kept available for inspection by the Technical Secretary or a Division representative.

TAPCR 1200-03-09-.02(11)(e)1.(iii)(II)II

**E2-2. Conservation Vent Maintenance:** For storage or process vessels subject to emission limitations based upon TAPCR 1200-03-07-.07(2):

Where removal of a pressure relief device such as a conservation vent from a storage or process vessel would otherwise result in excess emissions, the owner or operator is permitted to remove the pressure relief device provided the following applicable conditions are met:

For vessels which under normal operating conditions vent to a downstream piece of process or control equipment, a pressure relief device may be removed for up to a five-day period of time for maintenance, replacement, calibration, or inspection, under the following conditions:

- (a) Upward level movement of liquid within the vessel is restricted to ten percent of the vessel height during the period in which the pressure relief device is removed, or
- (b) Emissions of air contaminants due to working losses and inert gas purge losses are restricted to 100 pounds per day as determined by standard engineering estimation methods during the period in which the pressure relief device is removed.

Emissions occurring during the period of time the pressure relief device is removed shall not be considered excess emissions.

**E2-3. Visible Emissions Evaluation: General Requirements.** For all emission sources that use the opacity matrix decision trees (Attachment 1) to comply with any visible emissions requirement, including emission sources for which visible emissions are not required by the opacity matrix, if the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements. TAPCR 1200-03-10-.02(1)(a)

**E2-4. Identification of Responsible Official, Technical Contact, and Billing Contact**

- (a) The applications that were utilized in the preparation of this permit are dated May 23, 2019 and July 8, 2019 and are signed by Responsible Official Bill Fritsch, Director, Specialty Plastics MFG and Polymers for the permitted facility. If this person terminates employment or is assigned different duties and is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or

operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements, and/or covenants.

- (b) The applications that were utilized in the preparation of this permit are dated May 23, 2019 and July 8, 2019. The letter dated January 6, 2020 identifies Cory Wells as the Principal Technical Contact for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the Principal Technical Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.
- (c) The applications that were utilized in the preparation of this permit are dated May 23, 2019 and July 8, 2019 and identify Hanneke Counts as the Billing Contact for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

#### E2-5. New Source Performance Standards (40 CFR Part 60)

The emission sources included in this permit are subject to the NSPS standards identified in **Table E2-5**:

NSPS Subpart	Rule	Applies to:	
		ESRN	PES
A	General Provisions	82-0003-293	B-232-1
III	Standards of Performance for Volatile Organic Compound Emissions from the Synthetic Organic Chemical Manufacturing Industry Air Oxidation Unit Processes	82-0003-293	B-232-1
NNN	Standards of Performance for Volatile Organic Compound Emissions from the Synthetic Organic Chemical Manufacturing Industry Distillation Operations	82-0003-293	B-232-1
VVa	Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After November 7, 2006	82-0003-293	B-232-1

**Compliance Method:** A listing of specific applicability determinations for 40 CFR Parts 60 and 63 in effect as of the issuance date of this permit is found in Attachment 2. Compliance with this condition shall be assured by compliance with the specific requirements listed in Attachment 2. Changes that result in a change of applicability shall follow the applicable procedures in TAPCR 1200-03-09 and shall include an update to Attachment 2. The permittee shall comply with the applicable portions of the NSPS General Provisions as specified in 40 CFR 60 Subpart A and/or the referencing Subparts.

TAPCR 1200-03-09-.03(8)

#### E2-6. National Emission Standards for Hazardous Air Pollutants for Source Categories (40 CFR Part 63)

The emission sources included in this permit are subject to the MACT standards identified in **Table E2-6**:

MACT Subpart	Rule	Applies to:	
		ESRN	PES
A	General Provisions	82-0003-293	B-232-1

<b>Table E2-6: MACT Standards (40 CFR Part 63)</b>			
<b>MACT Subpart</b>	<b>Rule</b>	<b>Applies to:</b>	
		<b>ESRN</b>	<b>PES</b>
F	National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry	82-0003-293	B-232-1
G	National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater	82-0003-293	B-232-1
H	National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks	82-0003-293	B-232-1
EEEE	National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)	82-0003-293	B-232-1

**Compliance Method:** A listing of specific applicability determinations for 40 CFR Parts 60 and 63 in effect as of the issuance date of this permit is found in Attachment 2. Compliance with this condition shall be assured by compliance with the specific requirements listed in Attachment 2. Changes that result in a change of applicability shall follow the applicable procedures in TAPCR 1200-03-09 and shall include an update to Attachment 2. The permittee shall comply with the applicable portions of the MACT General Provisions as specified in 40 CFR 63 Subpart A and/or the referencing Subparts.

TAPCR 1200-03-09-.03(8)

**E2-7. Emissions Inventory Requirements (State-Only):** The permittee shall submit emissions inventories in accordance with TAPCR 1200-03-10-.05.

**Manufacture of Aromatic Acids (82-0003-293)  
Emission Source Specific Operating Permit Conditions\*  
Conditions E3-1 through E3-26 Apply**

1. EASTMAN SOURCE NUMBER		2. EMISSION SOURCE DESCRIPTION		3. EMISSION SOURCE REFERENCE NUMBER		4. MSOP NUMBER		5. PERMIT NUMBER	
PES B-232-1		Manufacture of Aromatic Acids		82-0003-293		MSOP-34		576931	
6. ID	7. PORTION OF SOURCE SUBJECT TO REQUIREMENT	8. POLLUTANT	9. UNDERLYING APPLICABLE REQUIREMENT(S)	10. LIMITATION OR STANDARD	11. REFERENCE TEST METHOD	12. PERIODIC MONITORING METHOD(S)			
<b>FEDERALLY AND STATE ENFORCEABLE CONDITIONS</b>									
E3-1	Entire Source, excluding fugitive equipment leaks from pumps, valves, flanges, etc.	VOC	TAPCR 1200-03-07-.07(2), construction permit 976998, Condition E3-1	328.63 tons/year	EPA Method 18, Engineering Assessment	<p>Vents A, B, J, V1, AA, AP, AQ, HA, MR, TB, UA, UB, UC, and WY – Recordkeeping: Maintain log of the production rate. See Operating Plan in the Title V application dated July 8, 2019, PES B-232-1, page 65.</p> <p>Vents A, B, G2, H2, HA, TB, and V1 – Recordkeeping: Calculate monthly and 12-month moving total emissions from production rate data and operating hours. See Operating Plan in the Title V application dated July 8, 2019, PES B-232-1, page 66.</p> <p>Vents A, AQ, B, H1, J, and WY – Parametric Monitoring: 24-hour block average scrubber flow rates. See Operating Plan in the application dated July 8, 2019, PES B-232-1, pages 52, 53, 55, 57, 59, and 64.</p> <p>Vent G1 – Parametric Monitoring: 24-hour block average scrubber flow rate and recirculation rate. See Operating Plan in the Title V application dated July 8, 2019, PES B-232-1, page 56.</p> <p>Vent AV – Parametric Monitoring: 24-hour block average scrubber flow rate and feed rate to B-455. See Operating Plan in the Title V application dated July 8, 2019, PES B-232-1, page 54.</p>			

\*See Table Notes for additional clarification of permit conditions.

**Manufacture of Aromatic Acids (82-0003-293)  
Emission Source Specific Operating Permit Conditions\*  
Conditions E3-1 through E3-26 Apply**

1. EASTMAN SOURCE NUMBER		2. EMISSION SOURCE DESCRIPTION			3. EMISSION SOURCE REFERENCE NUMBER		4. MSOP NUMBER		5. PERMIT NUMBER	
PES B-232-1		Manufacture of Aromatic Acids			82-0003-293		MSOP-34		576931	
6. ID	7. PORTION OF SOURCE SUBJECT TO REQUIREMENT	8. POLLUTANT	9. UNDERLYING APPLICABLE REQUIREMENT(S)	10. LIMITATION OR STANDARD	11. REFERENCE TEST METHOD	12. PERIODIC MONITORING METHOD(S)				
FEDERALLY AND STATE ENFORCEABLE CONDITIONS										
E3-1 cont.						<p>Vents V1, HA, TB, UB – Monitoring, recordkeeping, and reporting required by Condition E2-6 (40 CFR 63 Subpart G) will assure compliance with this limit.</p> <p>Vents UA and UC – Monitoring, recordkeeping, and reporting required by ID Limitation E3-26 will assure compliance with this limit.</p> <p>Vent UC – Recordkeeping: Maintain records to demonstrate that Oxidizer #5 is not routed to #3 Catalytic Oxidizer at the same time as the #4 Scrubber (Vent A) or the #5 Scrubber (Vent B). See Operating Plan in the Title V application dated July 8, 2019, PES B-232-1, page 67.</p> <p>Vents O, X, Y1, Y2, Y3, Y4, Y5, Z1, Z2, Z3, Z4, AD, AR, AT – Certification</p>				
E3-2	Entire Source	CO	TAPCR 1200-03-07-.07(2), construction permit 976998, Condition E3-2	1,043.86 tons/year	EPA Methods 10, 10A, or 10B, Engineering Assessment	<p>Vents UA and UC – Monitoring, recordkeeping, and reporting required by ID Limitation E3-26 will assure compliance with this limit.</p> <p>Vent UB – Monitoring, recordkeeping, and reporting required by Condition E2-6 (40 CFR 63 Subpart G) will assure compliance with this limit.</p> <p>Vents A, B, G2, H2, J, V1, AA, AQ, HA, MR, TB, UA, UB, UC, and WY – Monitoring, recordkeeping, and reporting required by ID Limitation E3-1 will assure compliance with this limit.</p> <p>Vent AP – Certification</p>				
E3-3	Entire Source	Particulates	TAPCR 1200-03-07-.01(5), Agreement letter dated February 7, 2020.	1.57 tons/year	Engineering Assessment	Certification				
E3-4	See State-only enforceable conditions below.									

\*See Table Notes for additional clarification of permit conditions.

**Manufacture of Aromatic Acids (82-0003-293)  
Emission Source Specific Operating Permit Conditions\*  
Conditions E3-1 through E3-26 Apply**

1. EASTMAN SOURCE NUMBER		2. EMISSION SOURCE DESCRIPTION		3. EMISSION SOURCE REFERENCE NUMBER		4. MSOP NUMBER		5. PERMIT NUMBER	
PES B-232-1		Manufacture of Aromatic Acids		82-0003-293		MSOP-34		576931	
6. ID	7. PORTION OF SOURCE SUBJECT TO REQUIREMENT	8. POLLUTANT	9. UNDERLYING APPLICABLE REQUIREMENT(S)	10. LIMITATION OR STANDARD	11. REFERENCE TEST METHOD	12. PERIODIC MONITORING METHOD(S)			
<b>FEDERALLY AND STATE ENFORCEABLE CONDITIONS</b>									
E3-5	Entire Source	Visible Emissions	TAPCR 1200-03-05	20% Opacity	EPA Method 9	Visible Emissions Evaluation: Emission units requiring initial VEEs – None, per TAPCD Opacity Matrix dated September 11, 2013.			
E3-6	Vents, A, B, HA, TB, UA, UB, and UC	VOC	TAPCR 1200-03-07-.07(2)	293.73 lb/hr	EPA Method 18	Monitoring, recordkeeping, and reporting required by ID Limitation E3-1 will assure compliance with this limit.			
E3-7	Vent V1	VOC	TAPCR 1200-03-07-.07(2)	11.32 lb/hr	EPA Method 18	Monitoring, recordkeeping, and reporting required by Condition E2-6 (40 CFR 63 Subpart G) will assure compliance with this limit.			
E3-8	Vents J, AQ, and WY	VOC	TAPCR 1200-03-07-.07(2)	16.30 lb/hr	EPA Method 18	Monitoring, recordkeeping, and reporting required by ID Limitation E3-1 will assure compliance with this limit.			
E3-9	Vent AV	VOC	TAPCR 1200-03-07-.07(2)	1.42 lb/hr	EPA Method 18	Monitoring, recordkeeping, and reporting required by ID Limitation E3-1 will assure compliance with this limit.			
E3-10	Flow Diagram Point AJ (Equipment Leaks)	VOC	TAPCR 1200-03-07-.07(2)	Quarterly Leak Inspection and Repair (Fugitive emissions from pumps, valves, flanges, etc. are estimated at 64.92 tons/year VOC)	See Item 10	See Item 10			
E3-11	Vents A, B, HA, MR, TB, UA, UB, and UC	CO	TAPCR 1200-03-07-.07(2)	1,369 lb/hr	EPA Method 10	<p>Vents A, B, HA, UA, UB, and UC – Monitoring, recordkeeping, and reporting required by ID Limitation E3-1 will assure compliance with this limit.</p> <p>Vents UA and UC – Monitoring, recordkeeping, and reporting required by ID Limitation E3-26 will assure compliance with this limit.</p> <p>Vents TB and UB – Monitoring, recordkeeping, and reporting required by Condition E2-6 (40 CFR 63 Subpart G) will assure compliance with this limit.</p>			

\*See Table Notes for additional clarification of permit conditions.

**Manufacture of Aromatic Acids (82-0003-293)  
Emission Source Specific Operating Permit Conditions\*  
Conditions E3-1 through E3-26 Apply**

1. EASTMAN SOURCE NUMBER		2. EMISSION SOURCE DESCRIPTION		3. EMISSION SOURCE REFERENCE NUMBER		4. MSOP NUMBER		5. PERMIT NUMBER	
PES B-232-1		Manufacture of Aromatic Acids		82-0003-293		MSOP-34		576931	
6. ID	7. PORTION OF SOURCE SUBJECT TO REQUIREMENT	8. POLLUTANT	9. UNDERLYING APPLICABLE REQUIREMENT(S)	10. LIMITATION OR STANDARD	11. REFERENCE TEST METHOD	12. PERIODIC MONITORING METHOD(S)			
<b>FEDERALLY AND STATE ENFORCEABLE CONDITIONS</b>									
E3-12	Vents J, AQ, and WY	CO	TAPCR 1200-03-07-.07(2)	29.48 lb/hr	EPA Method 10	Monitoring, recordkeeping, and reporting required by ID Limitation E3-1 will assure compliance with this limit.			
E3-13	Vent V1	CO	TAPCR 1200-03-07-.07(2)	2.50 lb/hr	EPA Method 10	Monitoring, recordkeeping, and reporting required by ID Limitation E3-1 will assure compliance with this limit.			
E3-14	Vent AV	CO	TAPCR 1200-03-07-.07(2)	1.34 lb/hr	EPA Method 10	Monitoring, recordkeeping, and reporting required by ID Limitation E3-1 will assure compliance with this limit.			
E3-15	See State-only enforceable conditions below.								
E3-16	Vents UA, UB, and UC	NO <sub>x</sub>	TAPCR 1200-03-07-.07(2)	6.23 tons/year	EPA Method 7	Certification			
E3-17	Reserved – See Condition E2-6 for MACT requirements.								
E3-18									
E3-19									
E3-20									
E3-21									
E3-22	Reserved – See Condition E2-5 for NSPS requirements.								
E3-23									
E3-24									
E3-25									
E3-26	Vents UA, UB, and UC	VOC and CO	40 CFR Part 64 – Compliance assurance monitoring  Vents UA and UC: See Attachment 3. Vent UB: §64.2(b)(1)(i) Exempt emission limitations or standards proposed by the Administrator after November 15, 1990 – Vent subject to Group 1 MACT control requirements.						

\*See Table Notes for additional clarification of permit conditions.

**Manufacture of Aromatic Acids (82-1004-58)  
Emission Source Specific Operating Permit Conditions\*  
Conditions E3-1 through E3-26 Apply**

<b>1. EASTMAN SOURCE NUMBER</b>  PES B-232-1		<b>2. EMISSION SOURCE DESCRIPTION</b>  Manufacture of Aromatic Acids			<b>3. EMISSION SOURCE REFERENCE NUMBER</b>  82-0003-293		<b>4. MSOP NUMBER</b>  MSOP-34		<b>5. PERMIT NUMBER</b>  576931	
<b>6. ID</b>	<b>7. PORTION OF SOURCE SUBJECT TO REQUIREMENT</b>	<b>8. POLLUTANT</b>	<b>9. UNDERLYING APPLICABLE REQUIREMENT(S)</b>	<b>10. LIMITATION OR STANDARD</b>	<b>11. REFERENCE TEST METHOD</b>	<b>12. PERIODIC MONITORING METHOD(S)</b>				
<b>STATE-ONLY ENFORCEABLE CONDITIONS</b>										
E3-4	Entire Source	Other organics	TAPCR 1200-03-07-.07(2)	297.67 lb/hr and 202.73 tons/year	Engineering Assessment	Not applicable: the term or condition does not implement relevant requirements of the Federal Act and is not an applicable requirement under the Federal Act.				
E3-15	Vents UA, UB, and UC	Other – Bromine gas/ Hydrobromic Acid	TAPCR 1200-03-07-.07(2)	12.27 lb/hr	Engineering Assessment	Not applicable: the term or condition does not implement relevant requirements of the Federal Act and is not an applicable requirement under the Federal Act.				

\*See Table Notes for additional clarification of permit conditions.

**Cooling Towers (82-0003-84)  
Emission Source Specific Operating Permit Conditions\*  
Conditions E4-1 through E4-3 Apply to Source**

<b>1. EASTMAN SOURCE NUMBER</b>  PES B-309-2		<b>2. EMISSION SOURCE DESCRIPTION</b>  Cooling Towers		<b>3. EMISSION SOURCE REFERENCE NUMBER</b>  82-0003-84		<b>4. MSOP NUMBER</b>  MSOP-34		<b>5. PERMIT NUMBER</b>  576931	
<b>6. ID</b>	<b>7. PORTION OF SOURCE SUBJECT TO REQUIREMENT</b>	<b>8. POLLUTANT</b>	<b>9. UNDERLYING APPLICABLE REQUIREMENT(S)</b>	<b>10. LIMITATION OR STANDARD</b>	<b>11. REFERENCE TEST METHOD</b>	<b>12. PERIODIC MONITORING METHOD(S)</b>			
<b>FEDERALLY AND STATE ENFORCEABLE CONDITIONS</b>									
E4-1	Entire Source	Visible Emissions	TAPCR 1200-03-05: Permit Number 954571P, Condition 5	20% Opacity	EPA Method 9	Visible Emissions Evaluation: Emission units requiring initial VEEs – Vents 1A, 1B, 1C, 1D, 1E, 1F, and 1G, per TAPCD Opacity Matrix dated September 11, 2013.			
E4-2	Entire Source	VOC	TAPCR 1200-03-07-.07(2): Permit Number 954571P, Condition 3.	0.57 tons/year	Engineering Assessment	Certification			
E4-3	Entire Source	Particulates	TAPCR1200-03-07-.01(5), agreement letter dated February 7, 2020	23.23 tons/year	Engineering Assessment	Certification			

(End of Conditions)

\*See Table Notes for additional clarification of permit conditions.

## Table Notes (January 22, 2020 Revision)

- Item 1**      **EASTMAN SOURCE NUMBER**  
Permittee's designation for the emission source.
- Item 2**      **EMISSION SOURCE DESCRIPTION**  
Permittee's description of the emission source.
- Item 3**      **EMISSION SOURCE REFERENCE NUMBER**  
TDEC-APC assigned number for the emission source.
- Item 4**      **MSOP NUMBER**  
Permittee's designation for major source operating permit
- Item 5**      **PERMIT NUMBER**  
TDAPC assigned major source operating permit number
- Item 6**      **ID**  
Emission limitation or standard identification
- Item 7**      **PORTION OF SOURCE SUBJECT TO REQUIREMENT**  
Identifies emission units to which the permit term or condition applies.
- Item 8**      **POLLUTANT**  
Identifies the air contaminant, regulated air pollutant, or other parameter to which the emission limitation or standard applies. Where the term "other organics" is used it means any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates and ammonium carbonate.
- Item 9**      **UNDERLYING APPLICABLE REQUIREMENTS**  
Specifies and references the origin of and authority for each term or condition.  
States the compliance dates for effective applicable requirements with future compliance dates.

### Glossary

Descriptions of regulatory citations that appear in Item 9 are given below:

NSPS	Standards of Performance for New Stationary Sources (40 CFR Part 60)
40 CFR 60 Subpart A	General Provisions
40 CFR 60 Subpart D	Standards of Performance for Fossil-Fuel Fired Steam Generators for Which Construction is Commenced After August 17, 1971
40 CFR 60 Subpart Da	Standards of Performance for Electric Utility Steam Generating Units for Which Construction Is Commenced After September 18, 1978
40 CFR 60 Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
40 CFR 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 CFR 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984
40 CFR 60 Subpart Y	Standards of Performance for Coal Preparation Plants
40 CFR 60 Subpart VV	Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry

40 CFR 60 Subpart VVa	Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006
40 CFR 60 Subpart DDD	Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing industry
40 CFR 60 Subpart III	Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes
40 CFR 60 Subpart NNN	Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations
40 CFR 60 Subpart RRR	Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes
40 CFR 60 Subpart YYY	Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Wastewater
40 CFR 60 Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 CFR 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
40 CFR 61 Subpart E	National Emission Standard for Mercury
40 CFR Part 63	National Emission Standards For Hazardous Air Pollutants For Source Categories
40 CFR 63 Subpart A	General Provisions
40 CFR 63 Subpart F	National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry
40 CFR 63 Subpart G	National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater
40 CFR 63 Subpart H	National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks
40 CFR 63 Subpart DD	National Emission Standards for Hazardous Air Pollutants From Off-Site Waste and Recovery Operations
40 CFR 63 Subpart JJ	National Emission Standards for Wood Furniture Manufacturing Operations
40 CFR 63 Subpart JJJ	National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins
40 CFR 63 Subpart FFFF	National Emission Standards for Hazardous Air Pollutants Miscellaneous Organic Chemical Manufacturing
40 CFR 63 Subpart GGGG	National Emission Standards for Hazardous Air Pollutants: Site Remediation
40 CFR 63 Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters
40 CFR Part 68	Chemical Accident Prevention Provisions.

#### Item 10 LIMITATION OR STANDARD

Gives the regulatory citation or expression of the emission limitation or standard. This expression identifies any difference in form as compared to the applicable requirement upon which the term or condition is based. The following general requirements apply to each allowable emission rate established in Item 10:

- (a) For non-process or process gaseous emissions subject to TAPCR 1200-03-06-.03(2) or 1200-03-07-.07(2), compliance with hourly emission limits shall be based on a 24-hour block average, unless a performance test is required to demonstrate compliance or a different averaging period is specified in the permit condition, application, or other applicable requirement.

- (b) For particulate matter and sulfur dioxide limits established by mutual agreement pursuant to TAPCR 1200-03-06-.01(7), 1200-03-07-.01(5), 1200-03-14-.01(3), compliance with hourly emission limits shall be based on a 24-hour block average, unless a performance test is required to demonstrate compliance or a different averaging period is specified in the permit condition, application, or agreement. Notwithstanding any mutual agreement, particulate matter and sulfur dioxide emission rates may not exceed the allowable emission rates established by TAPCR 1200-03-06, 1200-03-07, and 1200-03-14.
- (c) If a performance test is required to demonstrate compliance with a limitation or standard, compliance will be based on the averaging period specified in the underlying applicable requirement. If no averaging period is specified in the underlying applicable requirement, compliance will be based on the average of three one-hour test runs unless otherwise approved by the Technical Secretary.
- (d) Compliance with annual emission limits shall be based on a 12-month rolling total, unless a different period is specified in the permit condition, application, or other applicable requirement.

Emission work practice standards notated as “Quarterly Leak Inspection and Repair” or “Annual Leak Inspection and Repair” are detailed below:

#### **Quarterly and Annual Leak Inspection (TAPCR 1200-03-07-.07(2))**

- (a) (1) **Quarterly Leak Inspection:** A leak inspection of all equipment in air contaminant service (contains or contacts a process fluid that is at least 10% air contaminant by weight) that is not “in heavy liquid service” or “in vacuum service” shall be performed once per calendar quarter. For this inspection, detection methods incorporating sight (e.g. looking for drips), sound (e.g. hissing sounds indicative of a leak), or smell (e.g. strong odors traceable to piping leaks) shall be used as appropriate. “Equipment” includes piping, pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, and flanges. “In heavy liquid service” means when less than 20 weight percent of the process fluid consists of air contaminants having pure component vapor pressures greater than 0.044 psia at 68 degrees F, and the process fluid is not in the gaseous state at operating conditions. “In vacuum service” means equipment that is operating at an internal pressure that is at least 0.7 psia below ambient pressure. Equipment that is covered by insulation or obstructed from sight when standing on existing floors or walkways is exempt from this inspection. Equipment that is subject to a federally required work practice standard (e.g. 40 CFR Part 60, Subpart VV, 40 CFR Part 63, Subpart H, 40 CFR Part 265, Subpart BB) is exempt from this inspection. Equipment that is in air contaminant service less than 300 hours in a calendar quarter is exempt from this inspection for that quarter.
- (2) **Annual Leak Inspection:** A leak inspection of all equipment in air contaminant service (contains or contacts a process fluid that is at least 10% air contaminant by weight) that is not “in heavy liquid service” or “in vacuum service” shall be performed once per calendar year. For this inspection, detection methods incorporating sight (e.g. looking for drips), sound (e.g. hissing sounds indicative of a leak), or smell (e.g. strong odors traceable to piping leaks) shall be used as appropriate. “Equipment” includes piping, pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, and flanges. “In heavy liquid service” means when less than 20 weight percent of the process fluid consists of air contaminants having pure component vapor pressures greater than 0.044 psia at 68 degrees F, and the process fluid is not in the gaseous state at operating conditions. “In vacuum service” means equipment that is operating at an internal pressure which is at least 0.7 psia below ambient pressure. Equipment that is covered by insulation or obstructed from sight when standing on existing floors or walkways is exempt from this inspection. Equipment that is subject to a federally required work practice standard (e.g. 40 CFR Part 60, Subpart VV, 40 CFR Part 63, Subpart H, 40 CFR Part 265, Subpart BB) is exempt from this inspection. Equipment that is in air contaminant service less than 720 hours in a calendar year is exempt from this inspection for that year.
- (b) When a leak is detected, an initial attempt at repair shall be made no later than 10 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 30 calendar days after detection of each leak, except as provided in paragraph (c) below.
- (c) (1) Delay of repair of leaking equipment will be allowed if the repair is technically infeasible without a process unit shutdown or if repair personnel would be exposed to an immediate danger if attempting a repair without a process shutdown. Repair of this equipment shall occur by the end of the next process unit shutdown.

- (2) Delay of repair of equipment for which leaks have been detected is allowed for equipment that is isolated from the process and that does not remain in air contaminant service.
  - (3) Delay of repair for valves, connectors, and agitators is also allowed if the owner or operator determines that emissions of purged material resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair.
  - (4) Delay of repair beyond a process unit shutdown will be allowed for a valve if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the second process unit shutdown will not be allowed unless the third process unit shutdown occurs sooner than 6 months after the first process unit shutdown.
  - (5) Delay of repair of pumps for up to 6 months after leak detection is allowed if the pump is replaced with (i) a dual mechanical seal system, (ii) a pump with no externally actuated shaft penetrating the pump housing, or (iii) a new system that the permittee has determined will provide better performance.
- (d) Recordkeeping Requirements
- (1) Records must be maintained that identify piping systems or process areas subject to this plan.
  - (2) Records of all inspections must be kept documenting the inspection was conducted and the date of the inspection. If no leaks are detected during the inspection, the record must indicate this result.
  - (3) When a leak is detected, the following information shall be recorded:
    - (i) Component identifier or description of location and operator name, initials, or identification number.
    - (ii) The date the leak was detected.
    - (iii) The date the initial attempt at repair is made.
    - (iv) The date of successful repair of the leak. "Successful repair" means the leak is no longer detected using the inspection procedure outlined in item 10(a).
    - (v) "Repair delayed" and the reason for the delay if a leak is not repaired within 30 days after discovery of the leak.

#### Item 11 REFERENCE TEST METHODS (TAPCR 1200-03-10-.01(2))

- (a) Those emissions measuring test method(s) or procedure(s) by which demonstration of compliance with the emission limitation or standard would be determined as prescribed by the applicable requirement or if requested by the Technical Secretary pursuant to 1200-03-10-.01(2). Citations for performance test methods that may appear in item 11 are shown below:

<u>Pollutant or Parameter</u>	<u>Testing Methodology</u>
Gas Volumetric Flow Rate	EPA Methods 2, 2A, 2C, and 2D as published in the current 40 CFR 60, Appendix A
Dry Molecular Weight	EPA Method 3 as published in the current 40 CFR 60, Appendix A
Oxygen and Carbon Dioxide	EPA Method 3A as published in the current 40 CFR 60, Appendix A
Moisture Content	EPA Method 4 as published in the current 40 CFR 60, Appendix A
Particulate Matter	EPA Method 5 as published in the current 40 CFR 60, Appendix A
Sulfur Dioxide	EPA Method 6, 6A, 6B, or 6C as published in the current 40 CFR 60, Appendix A
Nitrogen Oxides	EPA Method 7, 7A, 7B, 7C, 7D, or 7E as published in the current 40 CFR 60, Appendix A

<u>Pollutant or Parameter</u>	<u>Testing Methodology</u>
Sulfuric Acid Mist and Sulfur Dioxide	EPA Method 8 as published in the current 40 CFR 60, Appendix A
Carbon Monoxide	EPA Methods 10, 10A, or 10B as published in the current 40 CFR 60, Appendix A
Total Fluoride Emissions	EPA Method 13A or 13B as published in the current 40 CFR 60, Appendix A
Gaseous Organic Compounds	EPA Method 18 as published in the current 40 CFR 60, Appendix A
Volatile Organic Compounds Leaks	EPA Method 21 as published in the current 40 CFR 60, Appendix A
Total Gaseous Nonmethane Organics	EPA Method 25 as published in the current 40 CFR 60, Appendix A
Total Gaseous Organics	EPA Method 25A as published in the current 40 CFR 60, Appendix A
Hydrogen Chloride & Chlorine	EPA Method 26 or 26A as published in the current 40 CFR 60, Appendix A
Visible Emissions (6 minute average)	EPA Method 9 as published in the current 40 CFR 60, Appendix A
Visible Emissions (Fugitives from Material Sources and Smoke from Flares)	EPA Method 22 as published in the current 40 CFR 60, Appendix A
Visible Emissions (aggregate count)	Tennessee Visible Emission Evaluation Method 2 as adopted by the Tennessee Air Pollution Control Board on August 24, 1984.
Visible Emissions (Roads and Parking Areas)	Tennessee Visible Emission Evaluation Method 1 as adopted by the Tennessee Air Pollution Control Board on April 29, 1982, as amended on September 15, 1982 and as amended on August 24, 1984.
Fugitive Dust Emissions Crossing a Property Line	Tennessee Visible Emission Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.
Sulfur Content of Fuels	EPA Method 19 as published in the current 40 CFR 60, Appendix A

- (b) In cases where the underlying applicable requirement does not specify performance testing requirements, the following shall apply:
- (1) Performance tests shall be conducted and data reduced in accordance with the test methods and procedures listed in Item 11 unless the Technical Secretary (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, (3) approves the use of an alternative method that is determined to be adequate for indicating whether a specific source is in compliance or (4) approves shorter sampling times and smaller sample volumes when necessitated by process variables or other factors.
  - (2) Performance tests shall be conducted under such conditions as the Technical Secretary shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Technical Secretary such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.
  - (3) The owner or operator of an affected facility shall provide the Technical Secretary at least 30 days prior notice of any performance test to afford the Technical Secretary the opportunity to have an observer present. The Technical Secretary may waive the right to such prior notice.
- (c) The owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:
- (1) Sampling ports adequate for test methods applicable to such facility. This includes (i) constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures and (ii) providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures.
  - (2) Safe sampling platform(s).
  - (3) Safe access to sampling platform(s).

- (4) Utilities for sampling and testing equipment.
- (d) Unless otherwise specified in the applicable requirement, each performance test shall consist of three separate runs using the applicable test method. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances, beyond the owner or operator's control, compliance may, upon the Technical Secretary's approval, be determined using the arithmetic mean of the results of the two other runs.
- (e) Where performance testing is technically infeasible or otherwise not specified by the permit, an engineering assessment, consisting of material or energy balances, emission factors, vapor-liquid equilibria, or other appropriate calculations, may be used to calculate emissions from an emission source or vent.

**Item 12 PERIODIC MONITORING METHODS (TAPCR 1200-03-09-.02(11)(e)(iii)(I), TAPCR 1200-03-10-.02(1)(a))**

- (a) Includes all of the following:
  - (1) All emissions monitoring and analysis procedures or test methods required under the applicable requirements, including any procedures and methods promulgated pursuant to sections 114(a)(3) or 504(b) of the Federal Act.
  - (2) Those monitoring, recordkeeping, and reporting requirements prescribed by the Technical Secretary in accordance with the powers granted at chapter 1200-03-10.
  - (3) Where the applicable requirement does not require periodic testing or instrumental or noninstrumental monitoring (which may consist of recordkeeping designed to serve as monitoring), periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit. These requirements assure use of such terms, test methods, units, averaging periods, and other statistical conventions consistent with the applicable requirements.
  - (4) Requirements concerning the use, maintenance, and installation of monitoring equipment or methods.
- (b) **Operating Plans:** Operating Plans referred to in this column are found in the permit application with page references given in this column. These Operating Plans are incorporated by reference into this Title V permit as fully enforceable conditions of the permit. Changes to an Operating Plan shall follow the applicable procedures in Section C of this permit. A permit shield does not attach to these changes unless the proposed change is processed through significant modification procedures.
- (c) **Applicability:** No monitoring or recordkeeping is required during periods during which the source is not in operation.
- (d) **Generic Periodic Monitoring Methods:** Additional requirements for periodic monitoring methods notated in item 12 by generic headings are shown below:
  - (1) **Certification:** Any emission unit or activity which is a subset of a process emission source, fuel burning installation, or incinerator, and which has a potential to emit less than 5 tons per year of a regulated air pollutant, by annual certification of compliance as required in item 1200-03-09-.02(11)(d)1.(ii)(I), shall be considered to meet the monitoring and related recordkeeping and reporting requirements of subpart 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)(1), and the compliance requirements of subpart 1200-03-09-.02(11)(e)3.(i) for that regulated air pollutant except where generally applicable requirements of the state implementation plan specifically impose monitoring and related record keeping and reporting requirements, or except where any applicable procedures and methods are required pursuant to rule 1200-03-10-.04. This provision shall not apply to emissions unit or activity that is subject to monitoring and related record keeping and reporting requirements under Chapters 1200-03-11 and 1200-03-31, and subparagraph 1200-03-02-.01(1)(dd).

For emission units or activities using annual certification of compliance to meet the monitoring, recordkeeping, and reporting requirements of TAPCR 1200-03-09-.02(11), potential emission calculations and other required documentation, including performance test results, material or energy balances, emission factors, vapor-liquid equilibria, or other appropriate calculations, are included with the application(s) of record and are incorporated by reference into this permit as the basis for certification.

- (2) **Parametric Monitoring**: (only applies to applicable requirements which do not specify monitoring requirements and the permit must specify periodic monitoring or testing pursuant to 1200-03-09-.02(11)(e)1.(iii)(I)II.)
- (i) The permittee must implement a system to monitor the control system parameters or process operating parameters shown in item 12 utilizing the averaging times shown.
  - (ii) The permittee must develop and obtain the approval of the Technical Secretary of an operating plan that includes a description of the parameter(s) to be monitored; an explanation for the selection of the parameter; description and location (if applicable) of monitoring equipment; the range (and the rationale for establishing the range) for each monitored parameter that indicates proper operation and maintenance of the control technology or pollution prevention measure; monitoring frequency; and any necessary data collection/compression procedures.
  - (iii) An excursion means a departure from an indicator range established for monitoring by this Title V permit, consistent with any averaging period specified for averaging the results of the monitoring.
  - (iv) Operation of each air contaminant source shall be in accordance with the provisions and stipulations set forth in the operating permit, all provisions of TAPCR 1200-03 and 0400-30, and all provisions of the Tennessee Air Quality Act. Some excursions, as defined under TAPCR 1200-03-09-.02(11)(b)31 or in the operating permit and which occur during periodic monitoring for compliance assurance, may be excused by the Technical Secretary. This authority is not extended to excursions that demonstrate noncompliance with an applicable emission limitation.
  - (v) For continuous monitoring systems, the following shall apply;
    - (I) The monitoring system shall measure data values at least once every 15 minutes.
    - (II) The owner or operator shall record either:
      - (A) Each measured value; or
      - (B) At least one measured value every 15 minutes; or
      - (C) Block average values for 15-minute or shorter periods calculated from all measured data values during each period or at least one measured data value per minute if measured more frequently than once per minute.
    - (III) Except as noted in Item 12(d)(2)(vi) (data requirements for valid one-hour averages), for a given averaging period, a valid average must include at least 75% percent of the measured values within the averaging period.
  - (vi) Where the permit requires twenty-four hour block averages of each continuously monitored parameter, the 24-hour block average shall be calculated from midnight of each day to midnight of the following day, unless a different averaging period is specified in the approved operating plan. The 24 hour block average shall be calculated as either the average of all values for a monitored parameter recorded under (d)(2)(vi)(ii) above during the 24 hour period or as the average of all valid one-hour averages for a monitored parameter recorded during the 24 hour period. If one-hour averages are used, they shall be calculated from four or more equally spaced data averages over each one-hour period, except during periods of monitoring system breakdown, monitoring system repairs, and periods of non-operation of the source. During these periods, a valid one-hour average shall consist of at least two 15-minute averages.
  - (vii) Data recorded during periods of monitoring system breakdown, monitoring system repairs, and periods of non-operation of the source shall not be included in the data averages. Records of the times and durations of all such periods and any other periods during process or control device operation when monitors are not operating shall be retained at the source location and kept available for inspection by the Technical Secretary or authorized representative.

- (viii) It shall also be acceptable to demonstrate that the monitored parameter is within the range stated in the operating plan for an applicable averaging period by retaining records of all valid measured values obtained during the averaging period where each valid measured value is within the range. For example, when a 24 hour block average is required, compliance may be assured by showing that all valid measurements taken at 15 minute intervals during a 24 hour period are within the applicable range as stated in the operating plan for the parameter. In these cases, it is not mandatory that an average be calculated
  - (ix) Pursuant to TAPCR 1200-03-10-.04(2)(a)2, monitoring methods must have at least a 95% operational availability during each semiannual reporting period. Missing data in excess of these levels shall be grounds for enforcement action. Each operational availability of less than 100%, and each missing or invalid averaging period, must be identified in the semiannual report required by **Condition E2-1** of this permit.
- (3) **Tank Monitoring:** The permittee must develop and obtain the approval of the Technical Secretary of an Operating Plan for demonstrating compliance with annual emission limits for a group of storage/process vessels. Table Notes from “Parametric Monitoring” above also apply to Operating Plans that employ continuous parametric monitoring systems (CPMS) for tanks. Tanks that have potential VOC emissions less than 5 tons per year qualify for meeting the monitoring and related recordkeeping and reporting requirements of subpart 1200-03-09-.02(11)(e)1.(iii) and the compliance requirements of subpart 1200-03-09-.02(11)(e)3.(i) by certification of compliance pursuant to part 1200-03-09-.04(5)(c).

(e) **General Requirements for Quarterly, Semiannual, and Annual Periodic Monitoring**

Except as specifically indicated otherwise within this permit (or by an applicable requirement referenced within this permit), the following requirements shall apply to periodic monitoring, recordkeeping, or testing.

- (1) Quarterly monitoring shall be completed at least once during each calendar quarter (January 1 through March 31 of each calendar year, April 1 through June 30 of each calendar year, July 1 through September 30 of each calendar year, and October 1 through December 31 of each calendar year).
- (2) Semiannual monitoring shall be completed at least once during each semiannual period corresponding to the semiannual reporting periods specified in Condition E2-1(a) of this permit.
- (3) Annual monitoring shall be completed at least once per each 12-month period corresponding to the annual reporting period specified in Condition E2-1(b) of this permit.
- (4) Periodic monitoring may be delayed for equipment that is out of service for an extended period, as follows:
  - (i) For quarterly periodic monitoring, if equipment is out of service for at least 45 consecutive days during the calendar quarter, periodic monitoring must be completed within 90 operating days of the previous monitoring event.
  - (ii) For semiannual periodic monitoring, if equipment is out of service for at least 90 consecutive days during the calendar semiannual period, periodic monitoring must be completed within 180 operating days of the previous monitoring event.
  - (iii) For annual periodic monitoring, if equipment is out of service for at least 180 consecutive days during the calendar year, periodic monitoring must be completed within 365 operating days of the previous monitoring event.

(f) **Recordkeeping: Data Entry Requirements**

- (a) For daily recordkeeping, all data, including results of all calculations, must be entered into the log no later than 14 days from the end of the day for which the data is required.
- (b) For weekly recordkeeping, all data, including results of all calculations, must be entered into the log no later than 14 days from the end of the week for which the data is required.

- (c) For all other recordkeeping, all data, including results of all calculations, must be entered into the log no later than 30 days from the date for which the data is required.

**END OF PERMIT NUMBER 576931**

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**ATTACHMENT 1**

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**OPACITY MATRIX DECISION TREE FOR  
VISIBLE EMISSION EVALUATION METHOD 9  
DATED SEPTEMBER 11, 2013**

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**Decision Tree PM for Opacity for Sources Utilizing EPA Method 9\***

**Notes:**

PM = Periodic Monitoring required by 1200-03-09-.02(11)(e)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standards set forth in the permit. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring – Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PM required.\*

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing EPA Method 9. The observer must be properly certified to conduct valid evaluations.

**Typical Pollutants**  
Particulates, VOC, CO, SO<sub>2</sub>, NO<sub>x</sub>, HCl, HF, HBr, Ammonia, and Methane.

Initial observations are to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

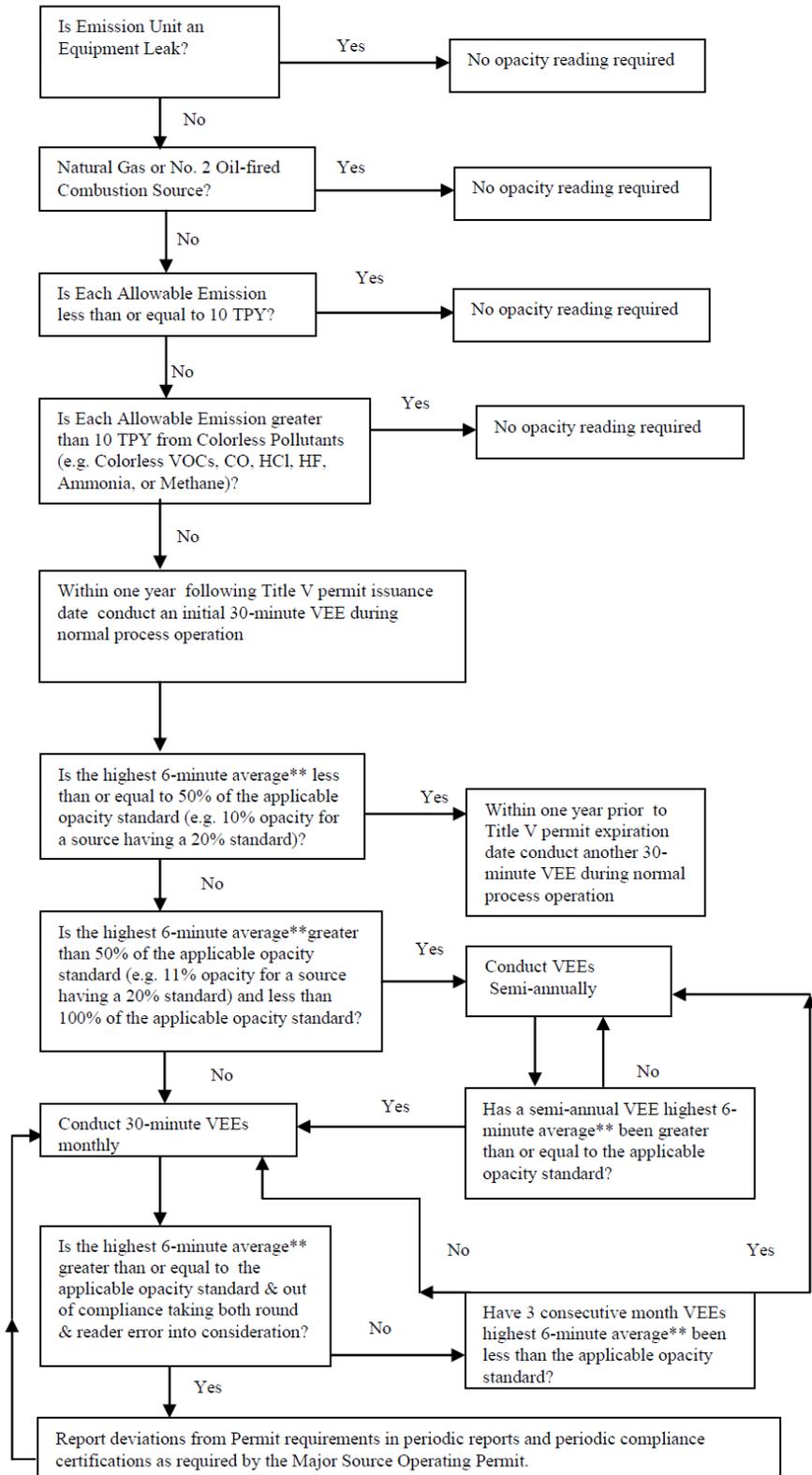
**Reader Error**  
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards: The TAPCD guidance is to declare non-compliance when the highest six-minute average\*\* exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

EPA Method 9, NSPS or NESHAPS stipulate opacity standards: EPA guidance is to allow only engineering round. No allowance for reader error is given.

\*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

\*\*Or second highest six-minute average, if the source has an exemption period stipulated in either the regulations or in the permit.

Dated June 18, 1996  
Amended September 11, 2013



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**ATTACHMENT 2**

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**SPECIFIC APPLICABILITY DETERMINATIONS  
FOR 40 CFR 60 (NSPS) AND 40 CFR 63 (MACT) TO MSOP-34**

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40 CFR 63 Subpart F (HON) Specific Applicability Determinations for MSOP-34				
PES	HON CMPU(s)	Identification	Category	Rule Citation
<b>Maintenance Wastewaters</b>				
B-232-1	All CMPUs	Applicable maintenance wastewater streams in the TPA and IPA CMPUs	Maintenance wastewaters that contain organic HAP's listed in Table 9 of Part 63 Subpart G.	Plan Requirements – §63.105(b) through (d) Recordkeeping – §63.105(e) Reporting – N/A
<b>General Recordkeeping and Reporting Requirements</b>				
B-232-1	All CMPUs	Sources subject to Subpart F, G, or H	General recordkeeping and reporting requirements including performance test notifications, record retention requirements, SSM recordkeeping, NOCs and periodic reports.	§63.103

40 CFR 63 Subpart G (HON) Specific Applicability Determinations for MSOP-34				
PES	HON CMPU(s)	Identification	Category	Rule Citation
<b>General Requirements</b>				
B-232-1	TPA & IPA	Affected Source	Applicability	§63.110(a)
B-232-1	TPA & IPA	Affected Source	Definitions	§63.111
B-232-1	TPA & IPA	Affected Source	Emission standard	§§63.112(c), (e)
B-232-1	TPA	Affected Source	Emission standard with emissions averaging	§§63.112(c), (e), (f)
B-232-1	TPA & IPA	Affected Source	Discarded liquid or solid organic materials with a concentration of greater than 10,000 parts per million of Table 9 compounds from a CMPU to water or wastewater require the receiving stream be managed and treated as a Group 1 wastewater stream. This does not apply to:  (1) Equipment leaks; (2) Activities included in maintenance or SSM plans; (3) Spills; or (4) Appropriately sized samples.	§63.132(f)
B-232-1	TPA & IPA	Affected Source	Initial notification	§63.151(b)
B-232-1	TPA & IPA	Affected Source	General reporting and continuous records	§63.152
B-232-1	TPA & IPA	Affected Source	Applicable general provisions	Table 1A
<b>Applicability – Overlap Provisions</b>				
B-232-1	TPA	Triangle HB	Group 1 process vent that is also subject to 40 CFR 60 Subpart III and uses Subpart G to demonstrate compliance with Subpart III	§63.110(d)(1)
B-232-1	IPA	Triangle HC		
B-232-1	TPA	Vents A and B	Group 2 process vent that has a TRE value greater than 4 and is also subject to 40 CFR 60 Subpart III having an NSPS III TRE value greater than 4	§§63.110(d)(2)(ii)(A) and (B)

<b>40 CFR 63 Subpart G (HON) Specific Applicability Determinations for MSOP-34</b>				
PES	HON CMPU(s)	Identification	Category	Rule Citation
B-232-1	TPA	Vent HA (Note 1)	Group 2 process vent that has a TRE value greater than 1 but less than or equal to 4 and is also subject to 40 CFR part 60 subpart III having an NSPS III TRE value greater than or equal to 1 but less than or equal to 4	§§63.110(d)(2)(ii)(A) - (C)
B-232-1	IPA	Vent TB (Note 1)		
B-232-1	TPA	Vent V1 (Note 1)	Group 2 process vent that has a TRE value greater than 1 but less than or equal to 4 and is also subject to 40 CFR part 60 subpart NNN having an NSPS NNN TRE value greater than or equal to 1 but less than or equal to 8	§§63.110(d)(5)(ii)(A) - (C)
<b>Process Vents</b>				
B-232-1	TPA	Triangle HB	Halogenated Group 1 process vent using a combustion device followed by a scrubber to reduce halogens for compliance (Note 3).  Per §63.7 and §§63.116(c) and (d), conduct a performance test within 180 days of startup of the modified emission source (Vent UB control device). Comply with the notification requirements of §63.7(b)(1) (provide written notification of the intention to conduct a performance test at least 60 calendar days before the performance test is initially scheduled to begin to allow the Administrator, upon request, to review and approve the site-specific test plan required (§63.7(c)(2)) and to have an observer present during the test (Note 4).	<b>Reference Control Technology:</b> §63.113(a)(2), (c)(1), (h) <b>Monitoring Requirements:</b> §63.114(a)(1)(ii), (a)(4), (e) <b>Group Determination:</b> N/A <b>Test Methods and Procedures:</b> §63.116(c), (d) <b>Reporting and Recordkeeping:</b> §63.117(a)(1) - (a)(3), (a)(4)(i), (a)(4)(ii), (a)(6), (a)(8), (f) §63.118(a)(1), (a)(2), (f)
B-232-1	IPA	Triangle HC		
B-232-1	TPA	Vents HA and V1 (Note 1)	Group 2 process vent having a flow rate greater than or equal to 0.005 scm/min, a HAP concentration greater than or equal to 50 ppmv, and a TRE index value greater than 1.0 but less than or equal to 4.0, that demonstrates compliance through an approved alternative monitoring plan because Eastman:  (1) Maintains a TRE greater than 1.0 but less than or equal to 4.0 without a recovery device or with a recovery device other than the recovery devices listed in §63.114(b) of this section; or  (2) Uses one of the recovery devices listed in §63.114(b) but seeks to monitor a parameter other than those specified in that section.	<b>Reference Control Technology:</b> §63.113(a)(3), (d) <b>Monitoring Requirements:</b> §63.114(c), (e) <b>Group Determination:</b> §63.115(a), (d), (e), (f) <b>Test Methods and Procedures:</b> N/A <b>Reporting and Recordkeeping:</b> §63.117(e), (f) §63.118(c), (f), (g), (k)
B-232-1	IPA	Vent TB (Note 1)		

40 CFR 63 Subpart G (HON) Specific Applicability Determinations for MSOP-34				
PES	HON CPMU(s)	Identification	Category	Rule Citation
B-232-1	TPA	A, B, Q, R, S, AA	Group 2 Process Vent with a TRE greater than 4.0	<b>Reference Control Technology:</b> §63.113(a)(3), (e) <b>Monitoring Requirements:</b> N/A <b>Group Determination:</b> §63.115(a), (d), (e), (f) <b>Test Methods and Procedures:</b> N/A <b>Reporting and Recordkeeping:</b> §63.117(b) §63.118(c), (f), (g), (h), (k)
<b>Storage Vessels</b>				
B-232-1	TPA	Tanks 09 (Vent AR)	Group 2 Storage Vessel	<b>Reference Control Technology:</b> §63.119(a)(3) <b>Procedures to Determine Compliance:</b> N/A <b>Reporting:</b> N/A <b>Recordkeeping:</b> §63.123(a)
B-232-1	IPA	Tank ALC-D-9 (Vent AD)		
<b>Process Wastewater</b>				
B-232-1	TPA	Hexagons WD, WG, WL, WR, WU	Group 2 wastewater stream at an existing source.	<b>General:</b> §63.130(a)(1)(i), (a)(3), (c) <b>Performance Standards for Treatment Processes:</b> N/A <b>Test Methods and Procedures for Determining Applicability:</b> §63.144(a)(1), (b)(1), b(3) - (b)(6), (c) <b>Reporting:</b> §63.144(b)(1), (b)(2) <b>Recordkeeping:</b> §63.145(b)(8), (f)
B-232-1	IPA	Hexagon WR		
<b>Emissions Averaging (Note 2)</b>				
B-232-1	TPA	See listing of sources in the emissions averaging plan included in the application attachments	Process vent, storage vessel, transfer rack, or process wastewater stream included in an emissions averaging plan	§63.150

40 CFR 63 Subpart G (HON) Specific Applicability Determinations for MSOP-34				
PES	HON CMPU(s)	Identification	Category	Rule Citation
<b>Notes:</b>				
<ol style="list-style-type: none"> <li>1. See the application attachment dated April 12, 2019, PES B-232-1, pages 81 through 84, for the alternative monitoring plans for Vents HA, TB, and V1.</li> <li>2. See the application attachment dated April 12, 2019, PES B-232-1, pages 85 through 93, for the HON Emissions Averaging Plan.</li> <li>3. Construction permit 976998 (issued August 19, 2019) allows 82-0003-293 (PES B-232-1) to replace the existing control device for Vent UB (#2 catalytic oxidizer) with a regenerative thermal oxidizer.</li> <li>4. Submit the written notification to Tennessee Department of Environment &amp; Conservation, Division of Air Pollution Control, William R. Snodgrass Tennessee Tower 15<sup>th</sup> Floor, 312 Rosa L. Parks Avenue, Nashville, TN 37243 or via e-mail (PDF) to <a href="mailto:air.pollution.control@tn.gov">air.pollution.control@tn.gov</a>.</li> </ol>				

40 CFR 63 Subpart H (HON) Specific Applicability Determinations for MSOP-34				
PES	HON CMPU(s)	Identification	Category	Rule Citation
B-232-1	TPA & IPA	Portions of Flow Diagram Point AJ in Organic HAP Service	Work practice standards for pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, instrumentation systems, and control devices or closed vent systems that are intended to operate in organic hazardous air pollutant service 300 hours or more during the calendar year.	§63.162 – §63.169, §63.171 – §63.176
B-232-1	TPA & IPA	HON H subject points as applicable	Recordkeeping and reporting	§63.181 - §63.182

40 CFR 63 Subpart EEEE (OLD) Specific Applicability Determinations for MSOP-34			
PES	Identification	Category	Rule Citation
B-232-1	Xylene Unloading	Transfer racks that only <i>unload</i> organic liquids.	§63.2343(a); §63.10(b)(1)
B-232-1	EEEE subject points as applicable	Notifications, recordkeeping and reporting.	§63.2382, §63.2386, and §63.2390.

<b>40 CFR Part 60</b>			
<b>Specific Applicability Determinations for MSOP-34</b>			
<b>PES</b>	<b>Identification</b>	<b>Category</b>	<b>Rule Citation</b>
<b>Subpart III – Air Oxidation</b>			
B-232-1	#1 Oxidizer (Vent A) #2 Oxidizer (Vent B) #3 Oxidizer (Vent HA) #4 Oxidizer (Vent HA) #5 Oxidizer (Triangle HB) #6 Oxidizer (Triangle HC/Vent TB) Oxidizer PG-01 (Vent HA) Oxidizer PG-01A (Vent HA)	<b>Sources Subject to Overlap Provisions</b> Each affected facility that produces any of the chemicals listed in §60.617 as a product, co-product, by-product, or intermediate, for which construction, modification, or reconstruction commenced after October 21, 1983, and for which compliance is demonstrated through compliance with 40 CFR 63 Subpart G (HON) or 40 CFR 63 Subpart FFFF (MON).	<b>Applicability:</b> §60.610(a) and (b)
<b>Subpart NNN – Distillation</b>			
B-232-1	Azeo Column (Vent V1)	<b>Sources Subject to Overlap Provisions</b> Each affected facility that is part of a process unit that produces any of the chemicals listed in §60.667 as a product, co-product, by-product, or intermediate, for which construction, modification, or reconstruction commenced after December 30, 1983, and for which compliance is demonstrated through compliance with 40 CFR 63 Subpart G (HON) or 40 CFR 63 Subpart FFFF (MON).	<b>Applicability:</b> §60.660(a) and (b)
<b>Subpart VVa – Equipment Leaks</b>			
B-232-1	Subject equipment in the TPA or IPA process unit that is not in acetic acid service (Portions of Vent AJ)	<b>Sources Complying with Subpart H</b> Each affected facility that commences construction, reconstruction, or modification after November 7, 2006, and complies with 40 CFR 63 Subpart H.	<b>Applicability:</b> §60.480a(a), (b), (e)(2), and (f) <b>Standards:</b> N/A <b>Test Methods and Procedures:</b> §60.485a(d), (e), (f) <b>Recordkeeping Requirements:</b> §60.486a(i) and (j) <b>Reporting Requirements:</b> N/A
B-232-1	Subject equipment in the TPA or IPA process unit that is also in acetic acid service (Portions of Vent AJ)	Alternative monitoring for equipment in acetic acid service. See letter dated January 23, 2004 from Beverly Banister, EPA Region 4, to Barry Stephens, TDEC-APC. See letter dated July 1, 2010 from Carol L. Kemker, EPA Region 4, to Barry Stephens, TDEC-APC, approving referenced NSPS VV alternative monitoring plans for use under NSPS VVa.	N/A

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**ATTACHMENT 3**

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**COMPLIANCE ASSURANCE MONITORING (CAM) PLAN**

**FOR MSOP-34**

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**Compliance Assurance Monitoring General Requirements:  
MSOP-34, PES B-232-1**

Identification	Requirement	Rule Citation
<b>Operation of Approved Monitoring</b>		
PES B-232-1, Vents UA and UC	Proper maintenance	§64.7(b)
	Continued operation	§64.7(c)
	Response to excursions or exceedances	§64.7(d)
	Documentation of need for improved monitoring	§64.7(e)
<b>Data Availability</b>		
PES B-232-1, Vents UA and UC  Comply with the data availability requirements specified in Item 12 of the Table Notes, or with specific requirements established in TAPCR 1200-03, 40 CFR, or permit conditions.	Minimum Data Availability	§64.6(c)(4)
<b>Quality Improvement Plan (QIP)</b>		
PES B-232-1, Vents UA and UC  The permittee shall comply with the provisions of §64.8 upon written notice from the Technical Secretary.	Requirement to submit QIP	§64.8(a)
	QIP elements	§64.8(b)
	Deadline for QIP development	§64.8(c)
	Reasonable changes to QIP	§64.8(d)
	QIP implementation	§64.8(e)
<b>Reporting and Recordkeeping Requirements</b>		
PES B-232-1, Vents UA and UC	Reporting requirements	§64.9(a)
	Recordkeeping requirements	§64.9(b)

<b>Compliance Assurance Monitoring (CAM) Plan – 40 CFR 64 MSOP-34, PES B-232-1</b>	
<b>Stack or Flow Diagram Points</b>	Vents UA and UC
<b>Pollutants</b>	VOC, Carbon Monoxide
<b>Description of Monitoring Protocol (§64.4(a)(1), §64.4(b))</b>	Monitor the inlet and outlet temperature of the catalyst bed using the distributed control system. The temperature of the outlet gas stream immediately after the catalyst bed is the primary parameter to ensure proper operation of the catalytic incinerator. A minimum inlet temperature also needs to be maintained to ensure that catalyst oxidation is initiated properly.
<b>Parametric Relationship (§64.4(a)(2))</b>	The minimum inlet and outlet temperatures required to assure proper operation have been established using performance test results supplemented by engineering assessments and/or manufacturer's recommendations. Prior to catalyst replacement, range finding tests may be conducted to determine if there is remaining catalyst life and new minimum temperature requirements may be established. Replacement of the catalyst with other than a "like-for-like" catalyst shall require establishment of a minimum inlet gas temperature using performance test results supplemented by engineering assessments and/or manufacturer's recommendations. A deviation from the current minimum 24-hour block average inlet gas temperature on the day of such a range finding test or performance test shall not be a reportable permit deviation under Condition E2-1 of this permit.
<b>Measurement Frequency (§64.4(a)(3))</b>	Continuous (measurements at least once every 15 minutes).
<b>Indicators</b>	<p>The following indicators are established: inlet and outlet temperatures of the catalyst bed. An excursion is defined as any 24-hour block (midnight to midnight) in which the average inlet or outlet temperature of the catalyst bed is less than the established minimum temperature.</p> <p>Since the minimum catalyst temperatures change as the catalyst ages, a single numeric value is not established for the inlet or the outlet. The permittee shall use the current minimum temperature established using performance test results, engineering assessments, and/or manufacturer's recommendations as a numeric indicator. Documentation supporting the current minimum inlet gas temperature shall be maintained on-site and made available for inspection upon request.</p>
<b>QA/QC Practices (§64.4(a)(3))</b>	The temperature device will be checked for accuracy once per calendar year and replaced as needed by maintenance personnel.
<b>Reference</b>	Operating Plan in the Title V application dated July 8, 2019, PES B-232-1, page 62.

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**ATTACHMENT 4**

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**AGREEMENT LETTER DATED FEBRUARY 7, 2020**

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Eastman Chemical Company  
P. O. Box 511  
Kingsport, Tennessee 37662

February 7, 2020

Via e-mail ([air.pollution.control@tn.gov](mailto:air.pollution.control@tn.gov))

Ms. Michelle W. Owenby, Technical Secretary  
Tennessee Department of Environment and Conservation  
Division of Air Pollution Control  
William R. Snodgrass Tennessee Tower  
312 Rosa L Parks Avenue, 15th Floor  
Nashville, TN 37243-1531

Subject: Mutual Agreement for More Restrictive Emission Limits

Reference: TAPCR 1200-03-05-.01(3) (General Visible Emission Standards)  
TAPCR 1200-03-06-.01(7) (General Non-Process Emission Standards)  
TAPCR 1200-03-07-.01(5) (General Process Particulate Emissions Standards)  
TAPCR 1200-03-14-.01(3) (General Provisions for the Control of Sulfur Dioxide Emissions)  
TAPCR 1200-03-26-.02(6) (Administrative Fees Schedule)

Dear Ms. Owenby,

Pursuant to the Tennessee Air Pollution Control Regulations (TAPCR) referenced above, upon mutual agreement of the owner or operator of any air contaminant source and the Technical Secretary, an emission limit more restrictive than that otherwise specified in the applicable Chapter may be established. In addition, these more restrictive regulatory requirements may be established to minimize the allowable emissions and thus the annual emission fee. The regulations require that each emission limit be stated as a special condition for any permit or order issued concerning the applicable source. Eastman would like to agree to more restrictive emissions limits being established for the pollutants listed in the table below and that the specific limits be listed in the applicable pending Title V renewal permits also listed below.

MSOP	Permit Number	Pollutant(s)	Requested Limit and Compliance Method
02	577389	Particulates	Limits and periodic monitoring that reference mutual agreement letters specified in the Title V applications
16	576946	Particulates, Sulfur Dioxide	
18	576091	Particulates	
19	575805	Particulates, Sulfur Dioxide	
25	576606	Particulates, Sulfur Dioxide	
26	576501	Particulates, Sulfur Dioxide	
31	576485	Particulates, Sulfur Dioxide	
32	576926	Particulates, Sulfur Dioxide, Visible Emissions	
33	576603	Particulates	
34	576931	Particulates	
35	577357	Sulfur Dioxide	

Ms. Michelle W. Owenby  
February 7, 2020  
Page 2

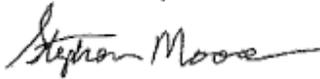
A certification statement for this request is also included with this letter as an enclosure.

If you have any questions concerning this information, you may contact me at (423) 229-5945 or [stephenmoore@eastman.com](mailto:stephenmoore@eastman.com).

Official correspondence should be addressed to Hanneke Counts at [Corp.Env.Affairs@eastman.com](mailto:Corp.Env.Affairs@eastman.com) or hardcopy to:

Hanneke Counts  
Vice President, Global HSES  
Eastman Chemical Company  
P.O. Box 511, B-54D  
Kingsport, TN 37662

Sincerely,



Steve Moore  
Environmental Operations, Kingsport

Enclosure

cc: Travis Blake  
Preston Pierce  
Matt Hayes

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**ATTACHMENT 5**

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**TITLE V FEE SELECTION FORM APC 36 (CN-1583)**

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### TITLE V FEE SELECTION

Type or print and submit to the email address above.

#### FACILITY INFORMATION

**1. Organization's legal name and SOS control number** [as registered with the TN Secretary of State (SOS)]

**2. Site name** (if different from legal name)

**3. Site address** (St./Rd./Hwy.)

County name

City

Zip code

**4. Emission source reference number**

**5. Title V permit number**

#### FEE SELECTION

This fee selection is effective beginning January 1, \_\_\_\_\_. When approved, this selection will be effective until a new Fee Selection form is submitted. Fee Selection forms must be submitted on or before December 31 of the annual accounting period.

**6. Payment Schedule (choose one):**

Calendar Year Basis (January 1 – December 31)

Fiscal Year Basis (July 1 – June 30)

**7. Payment Basis (choose one):**

Actual Emissions Basis  Allowable Emissions Basis  Combination of Actual and Allowable Emissions Basis

**8. If Payment Basis is "Actual Emissions" or "Combination of Actual and Allowable Emissions", complete the following table for each permitted source and each pollutant for which fees are due for that source. See instructions for further details.**

Source ID	Pollutant	Allowable or Actual Emissions	If allowable emissions: Specify condition number and limit.
			If actual emissions: Describe calculation method and provide example. Provide condition number that specifies method, if applicable.



## **TITLE V PERMIT STATEMENT - RENEWAL**

<b>Facility Name:</b>	<b>Eastman Chemical Company – Tennessee Operations Major Source Operating Permit (MSOP)-34</b>
<b>City:</b>	<b>Kingsport</b>
<b>County:</b>	<b>Sullivan</b>
<b>Date Application Received:</b>	<b>May 23, 2019, revised July 8, 2019</b>
<b>Date Application Deemed Complete:</b>	<b>May 23, 2019</b>
<b>Emission Source Reference No.:</b>	<b>82-0003 - MSOP-34</b>
<b>Permit No.:</b>	<b>576931</b>

### **INTRODUCTION**

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-3-9-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to Eastman Chemical Company - Tennessee Operations and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

#### **Acronyms**

PSD - Prevention of Significant Deterioration  
NESHAP - National Emission Standards for Hazardous Air Pollutants  
NSPS - New Source Performance Standards  
MACT - Maximum Achievable Control Technology  
NSR - New Source Review

**I. Identification Information**

A. Source Description for MSOP-34

Emission Source Number	PES	Description
82-0003-293	B-232-1	Manufacture of Aromatic Acids
82-0003-84	B-309-2	Cooling Towers

B. Facility Classification

1. Attainment or Nonattainment Area Location: The facility is located in an attainment area (Sullivan County) for the 8-hour ozone, annual PM<sub>2.5</sub>, and 24-hour PM<sub>2.5</sub> standards and a nonattainment area for the one-hour SO<sub>2</sub> standard.
2. Company is located in a Class II area.

C. Regulatory Status

1. PSD/NSR: This facility is a major source under PSD.
2. Title V Major Source Status by Pollutant:

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's status? (Major Source or Non-Major Source)
PM	Yes	Major Source
PM <sub>10</sub>	Yes	Major Source
SO <sub>2</sub>	Yes	Major Source
VOC	Yes	Major Source
NO <sub>x</sub>	Yes	Major Source
CO	Yes	Major Source
Individual HAP	Yes	Major Source
Total HAPs	Yes	Major Source
CO <sub>2e</sub>	Yes	Major Source

3. MACT Standards for Sources contained in this Title V Application: This facility is a major source for HAPs. A source contained in the MSOP-34 application is subject to the following MACT standards:

MACT Subpart	Rule
F	National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry
G	National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater
H	National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks

4. Program Applicability: Are the following programs applicable to the facility?  
 PSD (yes)  
 NESHAP (yes)  
 NSPS (yes)

**II. Compliance Status**

- A. Is this portion of the facility currently in compliance with all applicable requirements? Yes
- B. Are there any applicable requirements that will become effective during the permit term? no

**III. Other Requirements**

- A. Emissions Trading: The facility is not involved in an emissions trading program.
- B. Acid Rain Requirements: This facility is not subject to any requirements in Title IV of the Clean Air Act.
- C. Prevention of Accidental Releases: This source is subject to 40 CFR Part 68 as of June 21, 1999.

**IV. Public Participation Procedures**

Notification of this draft permit was mailed to the following environmental agencies:

- 1. EPA
- 2. North Carolina Department of Environment and Natural Resources
- 3. Virginia Department of Environmental Quality
- 4. Kentucky Department for Environmental Protection

## ADDENDUM TO TITLE V PERMIT STATEMENT: PUBLIC COMMENTS

<b>Company Name:</b>	<b>Eastman Chemical Company</b>
<b>Facility Name:</b>	<b>Eastman Chemical Company – Tennessee Operations Major Source Operating Permit (MSOP)-34</b>
<b>City:</b>	<b>Kingsport</b>
<b>County:</b>	<b>Sullivan</b>

<b>Date Application Received:</b>	<b>May 23, 2019, revised July 8, 2019</b>
<b>Date Application Deemed Complete:</b>	<b>May 23, 2019</b>

<b>Emission Source Reference No.:</b>	<b>82-0003 - MSOP-34</b>
<b>Permit No.:</b>	<b>576931</b>

<b>Public Notice Date</b>	<b>*****</b>
<b>Public Hearing Date</b>	<b>*****</b>

The public notice for this permit will be published in the *Kingsport Times-News*. Any comments received during the public comment period will be addressed in this section.

**Changes Made in Title V Renewal Permit 576931 (Pending)**

Condition or Section	Change												
Cover page	Updated facility address												
All sections	Updated all rule citations from “Tenn. Comp. R. & Regs.” (Tennessee Comprehensive Rules & Regulations) to “TAPCR” (Tennessee Air Pollution Control Regulations) based on revised guidance.												
B6, E2-1	Updated information for submittal of annual certification to U. S. EPA.												
B10, B11	Renumbered old Condition B10 to B11 for consistency with the current permit shell and marked B10 as reserved.												
E1, Attachment 5	Updated fee emissions and annual accounting period dates. Updated to use standard language and add fee selection form as Attachment 5.												
Section E2	<p>Permit conditions were renumbered as follows:</p> <table border="1"> <thead> <tr> <th>Old Permit Condition</th> <th>New Permit Condition</th> </tr> </thead> <tbody> <tr> <td>E1, E2-1, E2-2</td> <td>E1, E2-1, E2-2</td> </tr> <tr> <td>E2-3</td> <td>Deleted in renewal</td> </tr> <tr> <td>E2-4</td> <td>Deleted in renewal</td> </tr> <tr> <td>E2-5, E2-6</td> <td>E2-3, E2-4</td> </tr> <tr> <td>N/A</td> <td>E2-5, E2-6, E2-7 (new conditions)</td> </tr> </tbody> </table>	Old Permit Condition	New Permit Condition	E1, E2-1, E2-2	E1, E2-1, E2-2	E2-3	Deleted in renewal	E2-4	Deleted in renewal	E2-5, E2-6	E2-3, E2-4	N/A	E2-5, E2-6, E2-7 (new conditions)
Old Permit Condition	New Permit Condition												
E1, E2-1, E2-2	E1, E2-1, E2-2												
E2-3	Deleted in renewal												
E2-4	Deleted in renewal												
E2-5, E2-6	E2-3, E2-4												
N/A	E2-5, E2-6, E2-7 (new conditions)												
E2-1	Updated semiannual reporting requirements. Added requirements for transition of reporting between permits 568170 and 576993. Deleted old E2-1(c) (112(r) annual certification) – this requirement is covered by Condition A20. Added new E2-1(c) (records retention).												
E2-1(a)(3)	<p>Revised VEE submittal requirements. Per the opacity matrix dated September 11, 2013, visible emissions evaluations are not required for the vents indicated below.</p> <table border="1"> <thead> <tr> <th>PES</th> <th>Vent ID(s)</th> <th>Permit Condition</th> <th>Exemption</th> </tr> </thead> <tbody> <tr> <td>B-232-1</td> <td>A, AA, AD, AQ, AR, AT, AV, B, E1, E2, E3, E4, G1, G2, H1, H2, HA, J, MR, O, TB, UA, UB, UC, V1, WY, X, Y1, Y2, Y3, Y4, Y5, Z1, Z2, Z3, Z4</td> <td>E3-5</td> <td>Allowable PM and NO<sub>x</sub> emissions are less than 10 tons/year</td> </tr> </tbody> </table>	PES	Vent ID(s)	Permit Condition	Exemption	B-232-1	A, AA, AD, AQ, AR, AT, AV, B, E1, E2, E3, E4, G1, G2, H1, H2, HA, J, MR, O, TB, UA, UB, UC, V1, WY, X, Y1, Y2, Y3, Y4, Y5, Z1, Z2, Z3, Z4	E3-5	Allowable PM and NO <sub>x</sub> emissions are less than 10 tons/year				
PES	Vent ID(s)	Permit Condition	Exemption										
B-232-1	A, AA, AD, AQ, AR, AT, AV, B, E1, E2, E3, E4, G1, G2, H1, H2, HA, J, MR, O, TB, UA, UB, UC, V1, WY, X, Y1, Y2, Y3, Y4, Y5, Z1, Z2, Z3, Z4	E3-5	Allowable PM and NO <sub>x</sub> emissions are less than 10 tons/year										
E2-3 (old permit)	Deleted reserved condition.												
E2-4 (old permit)	Moved recordkeeping data entry requirements to Item 12 of the table notes.												
E2-5, Section E3	Moved NSPS applicable requirements from source-specific conditions to Section E2. PES B-232-1 continues to comply with 40 CFR 60 Subparts III and NNN via HON overlap (no changes to existing requirements).												
E2-6, Section E3	Moved MACT applicable requirements from source-specific conditions to Section E2. HON requirements (40 CFR 63 Subparts F, G, and H) were updated <sup>1</sup> to add general requirements for maintenance wastewaters and general recordkeeping/reporting (40 CFR 63 Subpart F). Added a performance test requirement (Subpart G) for the new control device associated with HON TRE Point Triangle HC (Vent UB regenerative thermal oxidizer). Per §63.7 and §§63.116(c) and (d), a performance test must be conducted within 180 days of startup of the modified emission source. Per §63.7(b)(1) written notification of the intention to conduct a performance test is required at least 60 calendar days before the performance test is initially scheduled. Corrected the CMPU associated with HON TRE Point Triangle HC from “TPA” to “IPA.” Updated the rule citations for Group 2 process vents with TRE > 4.0.												
E2-7	Added State-only requirement for emission inventory submittal.												
Section E3 and E4	Updated operating plan dates and page numbers to match the current application. No changes to existing monitoring unless otherwise noted below.												

<sup>1</sup> These changes were previously made in construction permit 976998.

**Changes Made in Title V Renewal Permit 576931 (Pending)**

Condition or Section	Change																																		
Section E3	<p>Permit conditions were renumbered as follows:</p> <table border="1"> <thead> <tr> <th>Old Condition (Permit 568170)</th> <th>New Condition (Permit 576931)</th> </tr> </thead> <tbody> <tr> <td>E3-1 through E3-4</td> <td>E3-1 through E3-4</td> </tr> <tr> <td>E3-9</td> <td>Deleted in renewal</td> </tr> <tr> <td>E3-10</td> <td>Deleted in renewal</td> </tr> <tr> <td>E3-11</td> <td>E3-9</td> </tr> <tr> <td>E3-12</td> <td>Deleted in renewal</td> </tr> <tr> <td>E3-13</td> <td>E3-10</td> </tr> <tr> <td>E3-14</td> <td>E3-11</td> </tr> <tr> <td>E3-15</td> <td>Deleted in renewal</td> </tr> <tr> <td>E3-16, E3-17, E3-18</td> <td>E3-12, E3-13, E3-14</td> </tr> <tr> <td>E3-19</td> <td>Deleted in renewal</td> </tr> <tr> <td>E3-20</td> <td>E3-15</td> </tr> <tr> <td>E3-21</td> <td>Deleted in renewal</td> </tr> <tr> <td>E3-22</td> <td>E3-16</td> </tr> <tr> <td>E3-23 through E3-27</td> <td>E3-17 through E3-21</td> </tr> <tr> <td>E3-28 through E3-31</td> <td>E3-22 through E3-25</td> </tr> <tr> <td>E3-32</td> <td>E3-26</td> </tr> </tbody> </table>	Old Condition (Permit 568170)	New Condition (Permit 576931)	E3-1 through E3-4	E3-1 through E3-4	E3-9	Deleted in renewal	E3-10	Deleted in renewal	E3-11	E3-9	E3-12	Deleted in renewal	E3-13	E3-10	E3-14	E3-11	E3-15	Deleted in renewal	E3-16, E3-17, E3-18	E3-12, E3-13, E3-14	E3-19	Deleted in renewal	E3-20	E3-15	E3-21	Deleted in renewal	E3-22	E3-16	E3-23 through E3-27	E3-17 through E3-21	E3-28 through E3-31	E3-22 through E3-25	E3-32	E3-26
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E3-1	Increased allowable VOC emissions (entire source excluding fugitive equipment leaks) from 321.43 tons/year to 328.63 tons/year. Updated daily production recordkeeping for Vents A, B, J, V1, AA, AP, AQ, HA, MR, TB, UA, UB, UC, and WY to include PTA production. Updated recordkeeping for Vents A, B, G2, H2, HA, TB, and V1 from hours of operation to calculation of monthly and 12-month total emissions based on operating hours and bypass vents. The application indicates that VOC emission rates from these vents are known from stack test data, modeling, and VOC loss from powder during conveying operations.																																		
E3-2	Decreased allowable CO emissions (entire source excluding fugitive equipment leaks) from 1169.43 tons/year to 1043.86 tons/year.																																		
E3-3	Decreased allowable PM emissions (entire source) from 3.09 tons/year to 1.56 tons/year.																																		
E3-4	Updated State-only limit for other organics.																																		
E3-9 (old permit)	Deleted 1.76 lb/hr VOC limit for Vents Q, R, S, and AA. Vents Q, R, and S were designated as insignificant emissions units, and Vent AA remains subject to the tons/year VOC limit in Condition E3-1.																																		
E3-10 (old permit)	Deleted 2.40 lb/hr VOC emission limit for Vents T1 through T4 and X. Vents T1 through T4 were designated as insignificant emissions units, and Vent X remains subject to the tons/year VOC limit in Condition E3-1.																																		
E3-12 (old permit)	Deleted 6.12 tons/year VOC emission limit for Vents O, AD, AO, and AR. Vent AO was designated as an insignificant emissions unit, and Vents O, AD, and AR remain subject to the tons/year VOC limit in Condition E3-1.																																		
E3-10	Revised pollutant description from "VOC and other organics" to "VOC."																																		
E3-11	Increased allowable CO emission rate (Vents A, B, HA, MR, TB, UA, UB, and UC) from 1,277.53 lb/hr to 1,369 lb/hr.																																		
E3-16	Replaced the 1.42 lb/hr NO <sub>x</sub> limit for Vents UA, UB, and UC with an annual NO <sub>x</sub> limit of 6.23 tons/year.																																		
E3-15 (old permit)	Deleted 11.61 lb/hr CO emission limit for Vents Q, R, S, and AA. Vents Q, R, and S were designated as insignificant emissions units, and Vent AA remains subject to the tons/year CO limit in Condition E3-2.																																		
E3-19 (old permit)	Deleted 0.50 lb/hr PM emission limit for Vents C1, C2, C3, D2, D3, E1, E2, E3, E4, G2, H2, UA, UB, UC, Y1, Y2, Y3, Y4, Y5, Z1, Z2, Z3, Z4, AO, AT, and AV. Vents C1, C2, C3, D2, D3, and AO were designated as insignificant emissions units. The other vents remain subject to the tons/year PM limit in Condition E3-3.																																		

**Changes Made in Title V Renewal Permit 576931 (Pending)**

<b>Condition or Section</b>	<b>Change</b>
E3-21 (old permit)	Deleted State-only emission limit for HBr.
E4-1	Updated periodic monitoring to require periodic VEEs for Vents 1A through 1F.
E4-2	Decreased allowable PM emissions (entire source) from 26.41 tons/year to 23.23 tons/year. Updated periodic monitoring from measurement of cooling tower conductivity to certification. The requested change was determined to be acceptable based on TAPCR 1200-03-09-.04(5)(a)1 (“Emissions unit” means any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant or any pollutant listed in paragraph 1200-03-31-.02(6). Emissions unit includes within its meaning the smallest discrete or identifiable structure, device, item, equipment, or enclosure or group of discrete or identifiable structures, devices, items, equipment, or enclosures that emit or have the potential to emit any regulated air pollutant or any pollutant listed in paragraph 1200-03-31-.02(6)). Potential emissions from the cooling tower cells are less than 5 tons/year each cell.
E4-4 (old permit)	Deleted 24-hour average lb/hr PM emission limit. PM emissions from this source remain subject to the annual emission limits in E4-2.
Table Notes	See below.
Attachment 4	Added a copy of the current agreement letter for PM emissions.

**Changes Made in Title V Renewal Permit 576931 (Pending) – Table Notes**

Item	Update/Change
General	Added revision date ( <b>January 22, 2020</b> ).
8	Added a definition of “other organics.”
10	<p>Added general requirements for allowable emission rates listed in Item 10 of each permit condition, as follows:</p> <ul style="list-style-type: none"> <li>(a) For pollutants subject to general requirements for non-process or process gaseous emissions, allowable hourly emission rates are based on a 24-hour block average, unless otherwise indicated in the permit condition, application, or other applicable requirement.</li> <li>(b) For PM and SO<sub>2</sub> limits established by mutual agreement, allowable hourly emission rates are based on a 24-hour block average, unless otherwise indicated in the permit condition, application, or other applicable requirement. Notwithstanding any mutual agreement, PM and SO<sub>2</sub> emission rates may not exceed the allowable emission rates established by TAPCR 1200-03-06, 1200-03-07, and 1200-03-14.</li> <li>(c) If a performance test is required to demonstrate compliance with a limitation or standard, compliance is based on the averaging period specified in the underlying applicable requirement. If no averaging period is specified in the underlying applicable requirement, compliance will be based on the average of three one-hour test runs unless otherwise approved by the Technical Secretary.</li> <li>(d) Compliance with annual emission limits is based on a 12-month rolling total, unless otherwise indicated in the permit condition, application, or other applicable requirement.</li> </ul> <p>Because Eastman’s applications typically specify periodic monitoring based on a 24-hour block average for hourly emission rates, the addition of this language clarifies, but does not change, the Division’s interpretation of the existing permit conditions.</p>
10(d)(3)	Corrected the recordkeeping removing a reference to quarterly inspection (recordkeeping requirements apply to both quarterly and annual leak inspections).
11	Renumbered portions of Item 11. Removed “exclusive” from the first sentence in Item 11(a). Updated CO test method to add Methods 10A and 10B. Added specific language addressing engineering assessments. Removed a portion of the language addressing excess emissions during startup, shutdown, and malfunction to resolve potential conflicts with the SSM SIP.
12	<p>Removed the reference to Condition B2 from Item 12(a)(3) (Condition B2 addresses records retention, not reporting). Renumbered item 12(d)(2) and removed the provision for manual readings during CPMS breakdowns, redefined excursions as departures from an indicator range only, updated excusal of excursion language with the general allowance of 1200-03-09-.02(6), added a data availability requirement for valid averages (this provision replaces the 75% data availability requirement previously defined in the excursion language), added a requirement for 24-hour block averages to be calculated from midnight to midnight unless a different averaging period is specified in the operating plan, deleted language related to retention of average values only (all data must be retained for 5 years). Added the 95% operational availability requirement specified in 1200-03-10-.04(2)(a)2 and a reporting requirement for missing/invalid data and operational availabilities less than 100%.</p> <p><b>Note - the 95% operational availability requirement works as follows:</b> When measured values are averaged (e. g., scrubber flow rates are continuously monitored and recorded to calculate a 24-hour block average), if less than 75% of the measured values are collected, the average is invalid. For a semiannual reporting period, if fewer than 95% of the required 24-hour block averages are valid during the reporting period, then the permittee has failed to comply with the operational availability requirement of Condition E2-11(d)(2). When measured values are not averaged, if fewer than 95% of the discrete readings are collected during the reporting period, then the permittee has failed to comply with the operational availability requirement of Condition E2-11(d)(2). Missed readings or invalid averages must be reported in the semiannual report but are not deviations if the operational availability requirement is met.</p>
12(d)(1)	Added certification requirements to ensure that the permit contains sufficient documentation for emissions units or activities that use annual certification in lieu of periodic monitoring.
12(e)	Renumbered item 12(e)
12(f)	Moved data entry requirements from Section E2 to the Table Notes and updated to include periods other than daily, weekly, and monthly monitoring.

**Statement of Basis for 82-0003 (MSOP-34): Changes in Fee Emissions since First Issuance**

Permit Number	Modification Number	Issue Date	Criteria Pollutants					HAP Without a Standard			HAP With a Standard		
			PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	NO <sub>x</sub>	VOC Family	Non-VOC Gaseous	PM Family	VOC Family	Non-VOC Gaseous	PM Family
556175	First Issuance	11/14/2003	22.4	N/A	N/A	631.9	5.7	N/A	N/A	N/A	155.44	N/A	N/A
556175	MPM-1	9/8/2004	22.4	N/A	N/A	631.9	5.7	N/A	N/A	N/A	155.44	N/A	N/A
556175	MPM-2	8/18/2005	22.5	N/A	N/A	633.9	5.7	N/A	N/A	N/A	136.37	N/A	N/A
556175	MPM-3	3/16/2007	22.6	N/A	N/A	568.8	5.7	N/A	N/A	N/A	136.43	N/A	N/A
556175	MPM-4	2/6/2008	22.6	N/A	N/A	568.8	5.7	N/A	N/A	N/A	136.43	N/A	N/A
556175	MPM-5	9/5/2008	22.6	N/A	N/A	568.8	5.7	N/A	N/A	N/A	136.43	N/A	N/A
561985	Renewal	6/22/2009	22.6	N/A	N/A	568.8	5.7	N/A	N/A	N/A	136.44	N/A	N/A
561985	MPM-1	4/23/2010	22.6	N/A	N/A	568.8	5.7	N/A	N/A	N/A	136.44	N/A	N/A
561985	MPM-2	10/12/2010	22.6	N/A	N/A	568.8	5.7	N/A	N/A	N/A	136.44	N/A	N/A
561985	MPM-3 (Note 4)	8/17/2011	22.6	N/A	N/A	568.8	5.7	N/A	N/A	N/A	136.44	N/A	N/A
561985	MPM-4	5/28/2013	22.6	N/A	N/A	568.8	5.7	N/A	N/A	N/A	136.44	N/A	N/A
561985	MPM-5	8/12/2013	29.7	N/A	N/A	568.5	5.7	N/A	N/A	N/A	136.44	N/A	N/A
561985	MM6	7/7/2014	29.7	N/A	N/A	432.68	5.7	N/A	N/A	N/A	149.33	N/A	N/A
568170	Renewal #2	11/24/2014	29.5	N/A	N/A	246.34	6.23	N/A	N/A	N/A	158.65	N/A	N/A
568170	MM1	5/26/2015	29.5	N/A	N/A	246.34	6.23	N/A	N/A	N/A	139.07	N/A	N/A
568170	SM1	8/30/2016	29.5	N/A	N/A	246.98	6.23	N/A	N/A	N/A	139.07	N/A	N/A
568170	MM2	8/30/2016	29.5	N/A	N/A	246.98	6.23	N/A	N/A	N/A	139.07	N/A	N/A
568170	AA1	6/16/2017	29.5	N/A	N/A	246.98	6.23	N/A	N/A	N/A	139.07	N/A	N/A
568170	MM3	9/1/2017	29.5	N/A	N/A	247.29	6.23	N/A	N/A	N/A	139.49	N/A	N/A
568170	MM4	6/20/2019	29.5	N/A	N/A	247.41	6.23	N/A	N/A	N/A	141.83	N/A	N/A
576931	Renewal #3	pending	24.8	N/A	0.06	238.52	6.23	N/A	N/A	N/A	155.6	N/A	N/A

**Notes:**

1. All emissions are in tons/year.
2. "HAP without a standard" emissions are typically included with VOC or PM for fee purposes.
3. "HAP with a standard" are typically not included with VOC emissions for fee purposes.
4. Emission increases associated with MPM-3 to permit 561985 are addressed in permit 562223 (MSOP-24), MPM-3.
5. Renewal #2 changes Federally enforceable limits from "VOC and other organics" to "VOC." "Other organics" is added as a State-only condition.