

COUNTY OF



ALLEGHENY

RICH FITZGERALD
COUNTY EXECUTIVE

NOTICE OF VIOLATION

April 16, 2021

CERTIFIED MAIL - 9489 0090 0027 6047 5264 86

Mr. Marshall Holmes, Jefferson Site Manager
Eastman Chemical Resins, Inc.
2200 State Highway 837
West Elizabeth, PA 15088-0545

RE: Notice of Violation #210402 - Violation of Installation Permit 0058-I022a Conditions V.A.1.k and Article XXI (“Air Pollution Control”), §2103.12.a.2.B and §2102.04.e; at property 2200 State Highway 837, West Elizabeth, PA 15088-0545.

Dear Mr. Holmes:

During a review of Eastman’s Semiannual Report submitted January 28, 2021, it was noted that Eastman reported exceedances of the emission limit from Installation Permit 0058-022a Condition V.A.1.k. A review of data submitted for the 2020 emission inventory confirmed these exceedances. Eastman stated that the excess emissions were due to excess nitrogen blowing from the Funda Filter to the Filtrate Receiver. The nitrogen valve was left open for an extended period of time causing potential excess batch emissions. Exceedances occurred for the following batches:

Beginning Date	Ending Date	Excess HAP lb/batch	Excess VOC lb/batch
8/10/2020	8/14/2020	0.75	1.29
8/17/2020	8/19/2020	0.05	---
10/21/2020	10/23/2020	0.04	---
10/22/2020	10/23/2020	0.04	---
Total excess emissions		0.88	1.29



DEBRA BOGEN, MD, DIRECTOR
**ALLEGHENY COUNTY HEALTH DEPARTMENT
AIR QUALITY PROGRAM**
301 39TH STREET • CLACK HEALTH CENTER • BUILDING 7
PITTSBURGH, PA 15201-1811
PHONE (412) 578-8103 • FAX (412) 578-8144
24-HR (412) 687-ACHD (2243)
WWW.ALLEGHENYCOUNTY.US/HEALTHDEPARTMENT



The above condition is a violation of Installation Permit 0058-022a Condition V.A.1.k, which states:

- k. Emissions from MP Poly Unit process (emission points S029, S030, S031, S033, S034, and S035) shall not exceed the following at any time: [§2103.12.a.2.B; §2102.04.e]

POLLUTANT	SHORT TERM EMISSION LIMIT (lb/batch ²)	ANNUAL EMISSION LIMIT (tons/year ¹)
Volatile Organic Compounds	21.5	13.5
Hazardous Air Pollutants	0.34	0.46
Particulate Matter	NA	1.77

¹ A year is defined as any consecutive 12-month period.

² Exclusive of auxiliary operations such as flushes, unit flushes, vessel cleaning, and dryer regenerations.

Eastman stated in the report that it is investigating the feasibility of corrective actions to prevent reoccurrence of exceedances. The Department requests that Eastman provide to the Department its plan to prevent future exceedances.

This Notice of Violation is neither an order nor any other final action of the Allegheny County Health Department. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action. Please be aware that any violation of the Article XXI regulations subjects a person to a variety of enforcement actions, including a civil penalty of up to \$25,000 per violation per day.

Please contact the ACHD within **14 days** of receipt of this notice to schedule a meeting to discuss the violation. A meeting may be scheduled by contacting Shannon Sandberg at (412) 578-7969 or emailing at shannon.sandberg@alleghenycounty.us. If a meeting is not requested, the ACHD will proceed with further enforcement action.

If you believe any of the facts in this Notice of Violation are in error, you may submit information to Ms. Sandberg via email or at the address shown at the bottom of the first page of this letter. The ACHD will consider new information you submit and take appropriate action. Thank you for your anticipated prompt attention to this matter.

Sincerely,



Shannon Sandberg
Enforcement Section Chief
Air Quality Program

cc: File