

COUNTY OF



ALLEGHENY

RICH FITZGERALD
COUNTY EXECUTIVE

WITHDRAWAL OF NOTICE OF VIOLATION

CERTIFIED MAIL - 9489 0090 0027 6047 4907 01

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

RE: Withdrawal of Notice of Violation #210402 - 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:

On April 16, 2021, the ACHD issued Notice of Violation #210402 alleging violations of the per batch emission limits from Installation Permit 0058-022a Condition V.A.1.k. Eastman reported these exceedances in the Semiannual Report submitted January 28, 2021 and in supporting data submitted for the 2020 emission inventory. 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 were reported 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**
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PHONE (412) 578-8103 • FAX (412) 578-8144
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The above condition was alleged to be 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.

Subsequent to issuance of the Notice of Violation, Eastman provided to the ACHD, in a letter dated April 30, 2021, revised emission estimates for the above-listed batches. These estimates were calculated using actual nitrogen flow rates. The revised estimates are below the emission limits.

Beginning Date	Ending Date	HAP Emitted (lb/batch)	VOC Emitted (lb/batch)
8/10/2020	8/14/2020	0.30	5.93
8/17/2020	8/19/2020	0.15	2.89
10/21/2020	10/23/2020	0.05	0.71
10/22/2020	10/23/2020	0.20	3.69

The ACHD met with Eastman on May 11, 2021 to discuss the revised estimates. During this meeting, Eastman explained that the revised flow rates used to recalculate emissions were taken from observations of valve positions compared to a calibration curve of valve positions versus valve flowrate. The original estimates used the design maximum flow rate. As presented during the meeting, the actual maximum nitrogen flow rate based on the observed valve position and calibration curve was approximately 25% of the design maximum nitrogen flow rate. Emissions are directly proportional to the nitrogen flow rate.

Based on these findings, the ACHD concludes that the emission limits from Installation Permit 0058-022a Condition V.A.1.k were not violated. The ACHD hereby withdraws NOV #210402.

Should you have any questions or require additional information, please contact Shannon Sandberg at (412) 578-7969 or via email at shannon.sandberg@alleghenycounty.us.

Sincerely,

A handwritten signature in blue ink that reads "Shannon Sandberg". The signature is written in a cursive, flowing style.

Shannon Sandberg
Enforcement Section Chief
Air Quality Program

cc: File