



STATE OF TENNESSEE  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
DIVISION OF AIR POLLUTION CONTROL  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 15<sup>th</sup> Floor  
Nashville, Tennessee 37243

February 14, 2014

Dr. Richard M. Strang, Manager  
Environmental Affairs  
Tennessee Operations  
Eastman Chemical Company  
P.O. Box 511, B-54D  
Kingsport, TN 37662

Reference Number: 82-1003-50-S4

Dear Dr. Strang:

This letter will serve to formally acknowledge receipt by the Tennessee Division of Air Pollution Control of the Comprehensive Performance Test Report for Liquid Chemical Destructor located in Building 248-2 at the Eastman Chemical Company facility in Kingsport, Tennessee. The testing was conducted on December 11-12, 2012 by the Eastman Chemical Company Environmental Services Laboratory and Alliance Source Testing. This incinerator is an existing affected source subject to the provisions of 40 CFR 63, Subpart EEE-National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors. In conformance with the requirements of 40 CFR 63, Subpart EEE, a Comprehensive Performance Test Plan, dated October 4, 2011, was submitted to the Division for approval. The Division formally approved this test plan in a letter dated April 9, 2012. The April 9, 2012 approval letter also approved certain Eastman Chemical requests for alternative procedures and acknowledged certain issues set forth in the test plan. Specifics of the Division's approvals and acknowledgements also set forth in the April 9, 2012 test plan approval letter.

This testing was initially set to commence on October 2, 2013. However, prior to the start of the actual testing issues with the air pollution control equipment precluded testing as set forth in the approved test plan. Due to the regulatory timelines for the conducting of the testing, Eastman requested a test extension and the Division granted the request on October 16, 2012.

The Comprehensive Performance Test Report has been reviewed by the Division's Compliance Validation Program. Based on this review, the Division considers the report to be technically correct with regards to the testing procedures employed, the mathematical accuracy of the calculations presented, and the acceptability of the equipment calibration data.

From the review of the Comprehensive Performance Test Report, the Division agrees that the testing was conducted in conformance with the Comprehensive Performance Test Plan dated October 4, 2011 and approved by the Division on April 9, 2012.

As presented in Tables 1-1 and 5.1 through 5.5 of the Comprehensive Performance Test Report compliance was demonstrated with the Replacement Standards for Hazardous Waste Combustors promulgated on October 12, 2005 (40 CFR 63.1219(a)).

As set forth in Section 3.2 of the Comprehensive Performance Test Report the operation of the liquid chemical destructor during the test period, as set forth in the Comprehensive Performance Test Plan, represented worst-case conditions to ensure continual compliance with all applicable emission limits during normal operation. Thus, the Division considers that the operation of the liquid chemical destructor was acceptable for a demonstration of compliance. A summary of the operational parameters determined from this performance testing is presented in Table 3-3 of the report and a complete discussion of the operation of the liquid chemical destructor is presented in Section 6.0 of the report. A listing of the operating parameter limits established during this Comprehensive Performance Test is set forth in Table 6-1 of the Comprehensive Performance Test Report.

As set forth in Table 6-2 of the Comprehensive Performance Test Report certain operating parameter limits were not set during this testing, but were established during the Destruction and Removal Efficiency (DRE) testing that was conducted during March 2003. This action is in conformance with the provisions of 40 CFR 63.1219(c) as no changes have been made to the LCD since that DRE testing. This issue was addressed in the Division's April 9, 2012, approval of the Comprehensive Performance Test Plan.

From the review of that portion of the Comprehensive Performance Test Report that contained the Continuous Monitoring System Performance Evaluation Test, it was noted that the Continuous Monitoring System Performance Evaluation Test was conducted in conformance with the Continuous Monitoring System Performance Evaluation Test Plan, dated October 4, 2012, and approved by the Division on April 9, 2012. It was also noted that each of the process instruments and each of the continuous in-stack monitoring systems demonstrated compliance with their required performance standards.

With the acceptance of this Comprehensive Performance Test Report, the Division agrees that the Eastman Chemical Company has fulfilled the Comprehensive Performance Testing requirement set forth in 40 CFR 63.1207(d)(1) and can utilize the operating parameter limits established through this testing to demonstrate continual compliance with applicable requirements.

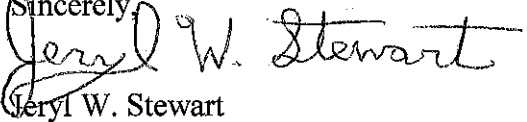
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This letter will also serve to acknowledge receipt of the Notification of Compliance for the Liquid Chemical Destructor. This document was submitted on March 6, 2013, and was incorporated into the above referenced Comprehensive Performance Test Report.

Should you have any questions concerning the matters addressed by this letter, please contact me at (615) 532-0605.

Sincerely,

A handwritten signature in cursive script that reads "Jeryl W. Stewart". The signature is written in dark ink and is positioned above the printed name.

Jeryl W. Stewart  
Compliance Validation Program  
Tennessee Division of Air Pollution Control

c: Johnson City EFO  
SWM Division