

May 17, 2018

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

Ms. Michelle Owenby  
Department of Environment and Conservation  
Division of Air Pollution Control  
William R. Snodgrass Tennessee Tower, 15<sup>th</sup> Floor  
312 Rosa L Parks Avenue  
Nashville, TN 37243

Subject: Request for Comment Regarding Start of Construction Determination

Reference: MSOP-29, PES RICE-1, Vent O (B-AGC RICE), 40 CFR Part 63 Subpart ZZZZ (RICE MACT)

Dear Ms. Owenby:

Currently Vent O is a permitted vent point, in the above referenced permit, as an existing stationary CI (compression ignition) RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions and is subject to 40 CFR Part 63 Subpart ZZZZ (RICE MACT). It is an emergency engine that is used solely for emergency power back-up. Potential to emit (PTE) emissions are based on operating hours for Emergency Generators assumed to be 500 hours per year, including 100 hours of non-emergency use for maintenance activities (per EPA Memorandum dated September 6, 1995 From: John S. Seitz, Director; Subject: Calculating Potential to Emit (PTE) for Emergency Generators). Criteria pollutant PTE emissions for this engine are provided below.

Emissions (TPY)

Location	Vent ID	PM2.5	SO2	VOC	CO	NOx
AGC	0	0.12	0.11	0.14	1.03	1.68

Eastman plans to move this existing emergency engine from its current location at AGC to a new concrete pad at B-280. The engine will remain an emergency CI engine that is used solely for emergency power back up. The federal applicability and requirements for this engine will remain unchanged. The engine will continue to be permitted in the existing MSOP-29 RICE-1 PES. PTE emissions for this engine will stay the same. Emissions totals for MSOP-29, found in APC 29 of the General Application Forms, are unaffected as a result of this change.

Upon information and belief, Eastman's has determined that this is a change that would not require notice or an application submittal prior to start of construction. Eastman amiably requests that TDAPC comment on this determination.

If you have any questions concerning this request, you may contact me at (423) 229-4988 or [clwells@eastman.com](mailto:clwells@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,



Cory Lee Wells  
Corporate Environmental Affairs