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July 6, 2007

Mr. Dan Jamieson
Texas Commission on Environmental Quality
Air Permits Division, MC 163
12100 Park 35 Circle
Austin, TX 78753

RE: ***Eastman Chemical Company – Texas Eastman Division***
Updated Screening CALPUFF BART Applicability Modeling Analyses
TCEQ Account Number HH-0042-M

Dear Mr. Jamieson:

Eastman Chemical Company operates the Texas Eastman Division (Eastman) in Longview, Texas. The Texas Commission on Environmental Quality (TCEQ) Account Number for the Eastman Longview Plant is HH-0042-M. Per discussions with you after the original submittal of the BART modeling analyses to TCEQ on April 29, 2007, Eastman performed a detailed examination of all BART eligible sources for the Longview Plant. The discovery of a database query error identified an additional 30 BART eligible sources that were omitted from the original CALPUFF BART applicability modeling analyses. As a result, Eastman conducted an updated BART modeling analyses which includes the 32 BART eligible sources modeled in the original CALPUFF run submitted on April 29, 2007 and the additional 30 BART eligible sources that were inadvertently omitted .

This letter summarizes Eastman's updated BART Applicability Analyses and resulting determination that the Eastman Longview Plant is still exempt from BART since the air quality modeling analyses demonstrate that the plant does not contribute to visibility impairment at federally-protected Class I areas. Accordingly, no BART Determination is required for the Eastman Longview Plant.

As discussed above, Eastman recognizes that 30 BART eligible sources were not included in the original BART modeling analyses. These sources have been added to the original 32 sources to results in a total of 62 BART eligible sources as the Longview Plant. Table 1-1 lists the 30 sources that were added to the original BART modeling analyses.

In the interest of taking an conservative approach, there are 8 BART eligible sources included in this modeling analysis that will be permanently shut down in the 4th quarter of 2007 and 5 BART eligible sources that will be permanently shut down in 2008. Note that the following BART eligible sources were not included in the analyses because they had been permanently shutdown: EPNs 032T101, 033H3, 033T101, 044T101, 062C7, and 062C9. Also note that EPNs 045FE1, 045FE2, and 045FE3 have been replaced with Electric Motors resulting in zero emissions from

those sources. As such, this approach should provide conservative estimates of the emissions at the Longview Plant.

TABLE 1-1 LIST OF BART-ELIGIBLE SOURCES

EPN	Source Description
011FL1	Flare
013C1FE	Compressor Engine
013C1GE	Compressor Engine
013C7BE	Compressor Engine
016CU1	Catalytic Oxidizer
016CU2	Catalytic Oxidizer
027FL1	Flare
030B11	Boiler Stack
030B12	Boiler Stack
030B8	Boiler Stack
030B9	Boiler Stack
032H5A	Propane Pyrolysis Furnace
035S703	Caustic Scrubber Column
042FL1**	Flare
044H3**	Heater Stack
044H4**	Heater Stack
044H5A**	Heater Stack
044H5B**	Heater Stack
063CU1	Catalytic Oxidizer
104FL1	Flare
108H1	Heater Stack
116FL2H	Flare
128FL1	Flare
141FL1	Flare
233FL1	Flare
170FL1	Flare
013D76F	Additive Mix Tank
013D76H	Additive Mix Tank
032H5B	Propane Pyrolysis Furnace
065LR1	Wax Rail Loading
108D601	Flaker Belt Chilled Water Storage Tank
F108FG2	Lube Oil Separator

EPN	Source Description
013C1DE	Westlake Engines
013C1EE	Westlake Engines
013C2DE	Westlake Engines
013C2EE	Westlake Engines
013C2FE	Westlake Engines
027GE2	Emergency Generator
030FL1	Flare
032H4	Heater Vent
033DCA*	Heater Vent
033H4*	Heater Vent
033H5A*	Heater Vent
033H5A-2	Heater Vent
033H5A-3	Heater Vent
033H5A-4	Heater Vent
033H5B*	Heater Vent
033H5B-2	Heater Vent
033H5B-3	Heater Vent
033H5B-4	Heater Vent
033HH6*	Heater Vent
042FL2**	Flare
044DCA**	Heater Vent
044H6**	Heater Vent
115FP10	Fire Pump
115FP9	Fire Pump
170FL2	Flare
233FL2	Flare
F010CT6	Cooling Tower
F040CT2	Cooling Tower
F042CT4	Cooling Tower
F633FG12	Plant Fugitive

* Scheduled to be permanently shut down in 2008.

** Scheduled to be permanently shut down in the 4th Quarter of 2007

The BART modeling analyses includes emissions of SO_2, NO_x, and/or PM_{10} from the 62 BART-eligible sources at Eastman's Longview Plant. The actual emissions (tons per year) from 2002 to 2005 was used to determine the maximum emission rates within the period. To be conservative, two times of these emission rates were used as the maximum 24-hour emission rates. A detailed spreadsheet showing all modeled sources, stack parameters and emission rates can be found in Attachment A of this letter. The results from the updated BART modeling analysis are represented in Table 1-2.

TABLE 1-2 RESULTS FOR ALL CLASS I AREAS

Class I Area	Max Modeled Impact (Ddv)		
	2001	**2002**	**2003**
Big Bend	0.101	0.070	0.091
Caney Creek	0.336	0.344	0.337
Carlsbad Caverns	0.101	0.087	0.042
Guadalupe Mountains	0.090	0.087	0.041
Hercules-Glades	0.150	0.262	0.185
Mingo Wilderness	0.093	0.199	0.100
Salt Creek	0.033	0.076	0.035
Upper Buffalo	0.195	0.362	0.225
White Mountains	0.046	0.059	0.018
Wichita Mountains	0.144	0.463	0.188

The results presented in Table 1-2 indicate that refined analyses were not necessary to evaluate visibility impacts at all Class I areas required for evaluation by Eastman. The results of this updated BART modeling analysis indicates that Eastman is not subject to BART; hence, the site is not required to conduct a BART Determination, because all 62 BART-eligible sources do not contribute to visibility impairment at all the Class I areas of interest (i.e. the Big Bend, Carlsbad Caverns, Caney Creek WA, Guadalupe Mountains, Hercules Glades WA, Mingo WA, Salt Creek, Upper Buffalo WA, White Mountain WA and Wichita Mountains WA), as demonstrated by a screening modeling analysis that quantified the maximum 24-hour average visibility impact as being less than the 0.5 dv contribution threshold.

If you have any questions about this letter, please feel free to contact me at (972) 661-8100, or Mr. Jerry Thurman at (903) 237-6710. Thank you for your attention to this matter.

Sincerely,

TRINITY CONSULTANTS

Weiping Dai

Weiping Dai
Managing Consultant

ATTACHMENT A

EMISSIONS FOR BART-ELIGIBLE SOURCES

Eastman BART Modeling Parameters

EPN	Description	LCC X (km)	LCC Y (km)	Stack Height (m)	Elevation (m)	Diameter (m)	Exit Velocity (m/s)	Temperature (K)	SO2 (lb/hr)	SO4 (lb/hr)	NOx (lb/hr)	HNO3 (lb/hr)	NO3 (lb/hr)	PM10 (lb/hr)
011FL1	Flare	216.848	-834.913	7.62	91.4	1.83	1.02	810.90	0.078	0.000	1.931	0.000	0.000	0.000
013C1FE	Compressor Engine	217.123	-834.923	12.19	91.4	0.30	17.43	435.90	0.007	0.000	21.942	0.000	0.000	0.434
013C1GE	Compressor Engine	217.122	-834.916	12.19	91.4	0.30	18.44	460.90	0.009	0.000	29.806	0.000	0.000	0.590
013C7BE	Compressor Engine	217.123	-834.971	12.19	91.4	0.41	16.98	452.60	0.010	0.000	33.290	0.000	0.000	0.654
016CU1	Catalytic Oxidizer	216.822	-834.73	4.88	91.4	0.45	22.25	533.20	0.003	0.000	0.335	0.000	0.000	0.000
016CU2	Catalytic Oxidizer	216.891	-834.727	4.88	91.4	0.41	3.66	683.20	0.005	0.000	0.088	0.000	0.000	0.000
027FL1	Flare	216.716	-835.131	7.92	91.4	2.13	6.10	977.60	0.000	0.000	0.596	0.000	0.000	0.000
030B11	Boiler Stack	217.248	-835.58	15.24	91.4	2.74	14.63	458.70	0.957	0.000	64.292	0.000	0.000	2.572
030B12	Boiler Stack	217.248	-835.58	15.24	91.4	2.74	14.63	458.70	1.056	0.000	54.292	0.000	0.000	2.536
030B8	Boiler Stack	217.191	-835.578	15.24	91.4	2.74	7.92	423.70	0.525	0.000	37.575	0.000	0.000	1.020
030B9	Boiler Stack	217.203	-835.578	15.24	91.4	2.74	7.92	423.70	0.557	0.000	25.927	0.000	0.000	0.704
032H5A	Propane Pyrolysis Furnace	217.374	-835.659	33.53	91.4	2.23	18.17	485.90	0.216	0.000	60.201	0.000	0.000	4.486
035S703	Caustic Scrubber Column	217.503	-835.971	19.20	91.4	0.61	10.67	316.50	0.160	0.000	9.781	0.000	0.000	0.000
042FL1	Flare	216.965	-835.846	2.44	91.4	0.46	0.01	298.20	0.001	0.000	1.620	0.000	0.000	0.000
044H3	Heater Stack	217.242	-835.952	28.96	91.4	1.22	2.74	533.20	0.008	0.000	0.658	0.000	0.000	0.000
044H4	Heater Stack	217.237	-835.952	13.11	91.4	0.76	0.91	810.90	0.009	0.000	0.746	0.000	0.000	0.000
044H5A	Heater Stack	217.216	-835.982	33.53	91.4	2.23	18.17	485.90	0.750	0.000	62.511	0.000	0.000	0.000
044H5B	Heater Stack	217.221	-835.982	33.53	91.4	2.23	18.17	485.90	0.783	0.000	65.251	0.000	0.000	0.000
063CU1	Catalytic Oxidizer	217.193	-835.008	6.1	91.4	0.3	9.14	477.6	0.086	0.000	0.349	0.000	0.000	0.000
104FL1	Flare	217.451	-834.369	1.52	91.4	0.02	0	298.2	0.012	0.000	0.133	0.000	0.000	0.000
108H1	Heater Stack	217.274	-835.776	10.67	91.4	0.61	4.57	588.7	0.046	0.000	3.487	0.000	0.000	0.000
116FL2H	Flare	217.577	-835.42	1.52	91.4	0.41	1.83	1366.5	0.009	0.000	0.993	0.000	0.000	0.000
128FL1	Flare	216.913	-835.545	15.24	91.4	0.2	0	298.2	0.000	0.000	0.606	0.000	0.000	0.000
141FL1	Flare	217.593	-834.291	1.52	91.4	0.05	0.03	366.5	0.017	0.000	0.195	0.000	0.000	0.000
233FL1	Flare	217.728	-836.123	1.22	91.4	0.41	1.83	1366.5	0.001	0.000	1.556	0.000	0.000	0.000
170FL1	Flare	217.641	-836.149	1.22	91.4	0.3	1.83	1366.5	0.001	0.000	1.556	0.000	0.000	0.000
013D76F	Additive Mix Tank	217.017	-835.001	1.83	91.4	0.91	0	298.2	0.000	0.000	0.000	0.000	0.000	0.033
013D76H	Additive Mix Tank	217.017	-835.001	3.05	91.4	0.91	0	298.2	0.000	0.000	0.000	0.000	0.000	0.033
032H5B	Propane Pyrolysis Furnace	217.373	-835.664	33.53	91.4	2.13	18.17	485.9	0.219	0.000	60.956	0.000	0.000	4.542
065LR1	Wax Rail Loading	217.055	-834.768	3.05	91.4	0.52	0.61	310.9	0.000	0.000	0.000	0.000	0.000	0.610
108D601	Flaker Belt Chilled Water Storage Tank	217.227	-835.766	7.32	91.4	0.3	9.14	298.2	0.000	0.000	0.000	0.000	0.000	3.653
F108FG2	Lube Oil Separator	217.176	-835.214	4.57	91.4	0.2	0	298.2	0.000	0.000	0.000	0.000	0.000	1.954
013C1DE	Westlake Engines	217.122	-834.957	12.19	91.44	0.20	23.16	424.8	0.004	0.000	13.502	0.000	0.000	0.267
013C1EE	Westlake Engines	217.122	-834.942	12.19	91.44	0.25	14.63	419.3	0.004	0.000	13.502	0.000	0.000	0.267
013C2DE	Westlake Engines	217.123	-834.947	12.19	91.44	0.20	16.55	458.2	0.004	0.000	12.152	0.000	0.000	0.241
013C2EE	Westlake Engines	217.123	-834.929	12.19	91.44	0.20	16.95	469.3	0.003	0.000	8.945	0.000	0.000	0.177
013C2FE	Westlake Engines	217.122	-834.909	12.19	91.44	0.20	16.55	458.2	0.003	0.000	8.945	0.000	0.000	0.177
027GE2	Emergency Generator	216.716	-835.131	1.22	91.44	0.06	0.27	588.7	0.0002	0.000	0.004	0.000	0.000	0.0003
030FL1	Flare	217.225	-835.578	8.84	91.44	0.15	37.19	1255.4	0.001	0.000	0.006	0.000	0.000	0.000
032H4	Heater Vent	217.402	-835.686	13.11	91.44	0.76	0.76	533.2	0.003	0.000	0.704	0.000	0.000	0.052
033DCA	Heater Vent	217.371	-835.763	4.57	91.44	0.46	86.56	1060.9	0.000	0.000	3.014	0.000	0.000	1.735
033H4	Heater Vent	217.404	-835.765	13.11	91.44	0.76	0.91	810.9	0.003	0.000	0.696	0.000	0.000	0.052
033H5A	Heater Vent	217.375	-835.743	33.53	91.44	2.23	18.17	485.9	0.075	0.000	20.840	0.000	0.000	1.553
033H5A-2	Heater Vent	217.375	-835.743	33.53	91.44	2.23	18.17	485.9	0.054	0.000	14.916	0.000	0.000	1.111
033H5A-3	Heater Vent	217.375	-835.743	33.53	91.44	2.23	18.17	485.9	0.052	0.000	14.446	0.000	0.000	1.076
033H5A-4	Heater Vent	217.375	-835.743	33.53	91.44	2.23	18.17	485.9	0.035	0.000	9.694	0.000	0.000	0.722
033H5B	Heater Vent	217.375	-835.743	33.53	91.44	2.23	18.17	485.9	0.450	0.000	18.438	0.000	0.000	1.374
033H5B-2	Heater Vent	217.375	-835.743	33.53	91.44	2.23	18.17	485.9	0.057	0.000	13.940	0.000	0.000	1.039
033H5B-3	Heater Vent	217.375	-835.743	33.53	91.44	2.23	18.17	485.9	0.050	0.000	13.722	0.000	0.000	1.022
033H5B-4	Heater Vent	217.375	-835.743	33.53	91.44	2.23	18.17	485.9	0.049	0.000	13.200	0.000	0.000	0.984
033H6	Heater Vent	217.398	-835.720	10.67	91.44	0.61	1.86	699.8	0.001	0.000	0.298	0.000	0.000	0.022
042FL2	Flare	217.024	-835.822	2.44	91.44	0.90	19.99	810.9	0.027	0.000	0.215	0.000	0.000	0.000
044DCA	Heater Vent	217.216	-835.982	4.57	91.44	4.57	10.67	755.4	0.000	0.000	3.014	0.000	0.000	1.735
044H6	Heater Vent	217.203	-835.952	10.67	91.44	0.61	1.86	699.8	0.002	0.000	0.172	0.000	0.000	0.013
115FP10	Fire Pump	217.626	-835.786	3.05	91.44	0.30	35.97	699.8	0.009	0.000	0.138	0.000	0.000	0.010
115FP9	Fire Pump	217.626	-835.798	3.05	91.44	0.30	35.97	699.8	0.018	0.000	0.276	0.000	0.000	0.020
170FL2	Flare	217.658	-836.145	1.22	91.44	1.07	0.03	1366.5	0.027	0.000	0.215	0.000	0.000	0.000
233FL2	Flare	217.753	-836.099	1.22	91.44	1.07	0.03	1366.5	0.027	0.000	0.215	0.000	0.000	0.000
F010CT6	Cooling Tower	216.950	-835.025	16.76	91.44	0.001	0.001	298.2	0.000	0.000	0.000	0.000	0.000	6.589
F040CT2	Cooling Tower	217.601	-835.840	16.76	91.44	0.001	0.001	298.2	0.000	0.000	0.000	0.000	0.000	15.127
F042CT4	Cooling Tower	217.132	-835.845	16.76	91.44	0.001	0.001	298.2	0.000	0.000	0.000	0.000	0.000	6.505
F633FG12	Plant Fugitive	219.048	-836.970	0.00	91.44	0.001	0.001	298.2	0.000	0.000	0.000	0.000	0.000	0.010