



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

August 12, 2025

TRANSMITTED VIA EMAIL

Mr. Jeffrey P. Mach
Texas Operations – LDAR Group Leader Longview Site
Eastman Chemical Company
P.O. Box 7444
Longview Texas 75607-7444
jpmach@eastman.com

RE: Eastman Chemical Company, Texas Operations Request for Exemption / Alternative Monitoring of Net Heating Value per 40 CFR §63.670(j)(6)-for the RKI Unassisted Backup Flare (EPN F187FL1)

Dear Mr. Mach:

The U. S. Environmental Protection Agency (EPA) received and reviewed your letter dated June 30, 2022, requesting an exemption from net heating value monitoring in accordance with the provisions outlined in 40 CFR § 63.670(j)(6) for the RKI (rotary kiln incinerator) Unassisted Backup Flare (EPN 187FL1, "the flare") at the Eastman Chemical Company ("Eastman") Texas Operations facility in Longview, Texas. The request proposes to exempt the flare from net heating value monitoring required in Title 40 Code of Federal Regulations (C.F.R.) § 63.670(j)(6) while still ensuring compliance with the net heating value of the flare combustion zone (NHVcz) requirements of 270 Btu/scf, as required in 40 C.F.R. § 63.670. The United States Environmental Protection Agency ("EPA") understands that the letter from Eastman dated June 30, 2022, constitutes the written application to be submitted to the Administrator for an exemption from monitoring described in 40 C.F.R. § 63.670(j)(6)(i). Based upon review of the information provided in your letter, a discussion between Eastman and EPA personnel on June 24, 2025, and further information submitted to EPA via email by June 27, 2025, EPA approves Eastman's request for an exemption under 40 CFR 63.670(j)(6) from direct compositional or net heating value flare vent gas monitoring required by 40 C.F.R. § 63.670(j) paragraph (1) or (2).

Background

Eastman operates a synthetic organic chemical manufacturing facility at 300 Kodak Blvd, in Longview, Texas. The facility contains an ethylene production unit and other chemical and polymer production units. Based on the process description and piping diagram provided by Eastman, the flare receives waste gas from a vent gas header associated to eight tanks ("tank farm") holding olefin production waste material, some of which contains benzene. The flare is unassisted and operates when the pressure relief valve header to the flare exceeds 4 psig.

During normal operation a pressure relief valve relieves pressure from the tank farm header at a setpoint of 2 psig, routing the waste gas to the Rotary Kiln Incinerator, which serves as the primary control device for the tank farm. Eastman further states that the flare is operated infrequently and only during abnormal operating scenarios. The flare was used for approximately 21 hours over the 5 years prior to the letter's submission, or less than 0.06% of total operating days. Eastman seeks to demonstrate continuous compliance with the applicable flare requirements through volume metering and default worst case Net Heating Value of Vent Gas (NHVvg) calculations.

Regulatory Basis

The tank farm stores benzene containing waste and waste "from a variety of production facilities including both MON and Olefin facilities". Pursuant to 40 CFR § 63.1103(e)(1)(i) all waste streams as defined in paragraph (e)(2) of Title 40 Code of Federal Regulations (C.F.R.) Part 63, Subpart YY, the National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic Maximum Achievable Control Technology Standards ("MACT YY") that are associated with an ethylene production unit, are an affected source under Subpart YY.

Pursuant to 40 CFR § 63.1103(e)(3) the owner or operator must control organic HAP emissions from each affected source emission point by meeting the applicable requirements specified in Table 7 to Subpart YY.

Pursuant to Table 7 to Subpart YY, for waste streams containing benzene, the facility must comply with Subpart XX of Part 63 – National Emission Standards for Ethylene Manufacturing Process Units: Heat Exchange Systems and Waste Operations ("Subpart XX").

Pursuant to Subpart XX, 40 C.F.R. § 63.1091 requires compliance with 40 C.F.R. Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations ("BWON"). Flares controlling waste management units to the BWON standards specified in §§ 61.343 through 61.347 of Subpart FF must comply with 40 C.F.R. § 60.18. CFR § 61.349(a)(2)(iii). Overlap provisions of Subpart YY state that flares subject to 40 CFR 60.18 or § 63.11 and used as a control device for an emission point subject to the requirements in Table 7 to § 63.1103(e) are required to comply only with § 63.1103(e)(4). 40 CFR § 63.1100(g)(7)(i). 40 C.F.R. § 63.1103(e)(4) requires compliance with applicable provisions of §§ 63.670 and 63.671 of Subpart CC.

Pursuant to 40 § CFR 63.670(j)(6) Direct compositional or net heating value monitoring is not required for gas streams that have been demonstrated to have consistent composition (or a fixed minimum net heating value) according to the methods in paragraphs (j)(6)(i) through (iii) of Subpart CC.

Determination

Eastman proposes to demonstrate compliance with NHVcz operating limits through defaulting the net heating value of the tank farm header vent gas to 0 Btu/scf, and supplementing that waste gas stream with an appropriate amount of natural gas to achieve at least 270 Btu/scf NHVcz. Eastman further states that the flare is operated infrequently, approximately 21 hours over the last 5 years, and only as a backup to the primary control device – the rotary kiln incinerator.

Eastman's letter contains a description of the flare gas stream/system to be considered, including submission of a portion of the appropriate piping diagrams indicating the boundaries of the flare gas stream/system and the affected flare(s) to be considered, a statement that there are no crossover or entry points to be introduced into the flare gas stream/system as shown in the piping diagram prior to the point where the flow rate of the gas streams is measured, and an explanation of the conditions that ensure that the flare gas net heating value is assumed to be consistent. By including the preceding information, Eastman's letter has satisfied the requirements of 40 CFR 63.670(j)(6)(i)(A) through (C). Because Eastman has selected the lowest possible NHVvg for the tank farm header vent gas, it satisfies the requirements of 40 CFR 63.670(j)(6)(i)(D) and (E). Eastman has satisfied the requirements of 40 CFR 63.670(j)(6)(i)(F) by selecting the lowest possible fixed minimum NHVvg (0 Btu/scf) for the tank farm header vent gas. Eastman has stated to EPA that the system for operating the flare is automated, and the flaring process is ordered to ensure compliance with the applicable control requirements. Eastman has demonstrated, through engineering design documentation provided to EPA, that the Btu content will exceed 270 Btu/scf even at the greatest tank farm header vent gas flow rate possible.

This determination was made based on data and supporting information supplied to EPA for the RKI Unassisted Backup Flare, and is not applicable to any other units or facilities without prior approval from EPA. If you have any questions or concerns about this approval, please contact Ben Rosenthal of my staff at rosenthal.benjamin@epa.gov or at 214-665-6543.

Sincerely,

**STEVEN
THOMPSON**

Steve Thompson
Chief
Air Enforcement Branch

 Digitally signed by STEVEN
THOMPSON
Date: 2025.08.12 11:39:58 -05'00'

Ecc: Ms. Michelle Baetz (michelle.baetz@tceq.texas.gov)
Regional Air Section Manager

Texas Commission on Environmental Quality

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