ENVIRONMENTAL JUSTICE FACT SHEET

1.1 Introduction

Solutia, Inc. (Solutia), a subsidiary of Eastman Chemical Company, has filed an Air Quality Permit Application with the Massachusetts Department of Environmental Protection (MassDEP) for its existing facility at 730 Worcester Street in Springfield, Massachusetts (Indian Orchard Facility). The proposed modification is subject to the Massachusetts Air Pollution Control Regulations and must apply for and receive a permit (known as an "Approval") before it can begin construction of the project. The MassDEP is currently reviewing the permit application according to the applicable regulations.

After completing its review, the MassDEP will issue a proposed decision to approve or deny the permit application, and at that time will provide a 30-day public comment period on its proposed decision. Information on how to review the permit application and be notified of MassDEP's proposed decision, and how to submit comments, can be found at the bottom of this Environmental Justice (EJ) Fact Sheet.

1.2 Facility Information

The Indian Orchard Facility manufactures specialty products including chemicals and plastic interlayers for automobile windshields, solar panels, and building windows. The facility's Standard Industrial Classification (SIC) Code is 3081: Unsupported Plastics Film and Sheet Manufacturing from Resin. The South Butvar production unit, emission unit (EU) 142 at the Springfield Facility, employs batch processes for the manufacture of polyvinyl butyral (PVB), trademarked Butvar®.

1.3 Project Information

Solutia submitted a Non-Major Comprehensive Plan Approval (NMCPA) application for approval to install a new air emissions control device, regenerative thermal oxidizer (RTO) for the South Butvar production unit. This is a voluntary improvement project to upgrade existing emissions control equipment. The RTO will replace the existing wet scrubber and biofilter used to control volatile organic compound (VOC) emissions from the South Butvar production unit at the Indian Orchard Facility. There are two emission units controlled by the current control system: EU 142 S06 – Resin Drying and EU 142 S11 – Distillation Column (D Column). These emission units, which are currently controlled by the wet scrubber and biofilter in series, will be controlled by the proposed RTO. The proposed project will not result in any changes to the current process operation or design parameters and will not result in an increase in throughput through the process unit. Additionally, the RTO will have a control efficiency of 95 percent, which is significantly higher than the current control system's 85 percent control efficiency. Therefore, there is no VOC emissions increase for the production units associated with the proposed project. There will be a small increase in combustion emissions from the Indian Orchard Facility due to the RTO burner. However, the natural gas-fired low nitrogen oxide (NO_X) burner is maximally rated at 9.8 million British thermal units per hour, which is below plan approval thresholds per 310 Code of Massachusetts Regulations (CMR) 7.02(4)(a)2.a.

Table 1. VOC Emissions Comparison

Scenario	Emissions at 85% Control (tpy)	Emissions at 95% Control (tpy)	Estimated Reductions (tpy)
Potential VOC Emissions[a]	60.91	20.30	-40.61

a. Potential emissions based on current and proposed permit.

1.4 Regulatory Information

The installation of the new RTO will not change the current regulatory applicability for the two emission units (142 S06 and 142 S11) that will vent to the RTO. Additionally, there will be no changes to the process operation or design parameters nor will there be any increase in throughput through the process unit. Details of the regulations and requirements that apply to 142 S06 (Resin Drying) and 142 S11 (D Column) are included in the Operating Permit for Solutia's Springfield facility. Additionally, a Best Available Control Technology (BACT) analysis is not required for this project, since there are no new or modified emission units being proposed and the control efficiency of the new control device is significantly higher than that of the current control device. RTO technology is often considered by MassDEP to be the best type of control device to achieve BACT.

1.5 Public Participation and Comment

The MassDEP is currently reviewing this permit application. If you have questions or would like more information about the permit application or agency review process, or would like to be added to the distribution list to be notified when the public comment period on the draft decision begins, please contact the MassDEP personnel listed at the end of this section.

The permit application is currently available for public review via the Executive Office of Energy and Environmental Affairs (EEA) ePLACE Public Access Portal: https://eeaonline.eea.state.ma.us/EEA/PublicApp/ On the main EEA ePLACE Portal page, click on the **orange** "Search and/or Comment" button, then on the name of the applicant/facility on the resulting page.

After the MassDEP completes its review of the permit application, the agency will issue a proposed decision, subject to a 30-day public comment period. This information will also be posted in the ePLACE Public Access Portal. If you would like to be notified of the proposed decision and the public comment period, please contact Cortney Danneker of the MassDEP at cortney.danneker@state.ma.us.

1.6 Applicant Contact Information

Please contact Amanda Allman at aallman@eastman.com or (423) 229-1025 with any questions regarding this project. Technical questions can be directed to Chris Aberg at chrisaberg@eastman.com.