



United States Department of the Interior

NATIONAL PARK SERVICE
Air Resources Division
P.O. Box 25287
Denver, CO 80225-0287

May 4, 2012

Barry Stephens, Director
Air Pollution Control Division
Tennessee Department of Environment and Conservation
9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243

Dear Mr. Stephens:

The National Park Service (NPS) has reviewed the Tennessee Department of Environment and Conservation (TDEC)'s proposed alternative for Best Available Retrofit Technology (BART) for Eastman Chemical Company and supports TDEC's conclusion that the alternative BART measure would result in greater progress in improving visibility at Great Smoky Mountains National Park.

In 2008, TDEC determined that a sulfur dioxide emissions limit of 0.2 lb/mmBtu is BART for the five coal-fired boilers at Eastman's B-253 Powerhouse. TDEC now proposes to retain this emissions limit if Eastman continues to burn coal and to modify the permit to allow Eastman a BART alternative to repower the coal-fired boilers with natural gas with an effective sulfur dioxide emissions rate of 0.0006 lb/mmBtu. Because natural gas has little sulfur content, the alternative would accomplish greater reductions in sulfur dioxide emissions than the original BART determination. Due to uncertainty in siting and sizing a natural gas pipeline, TDEC is proposing to allow an additional year, to July 31, 2018, if Eastman chooses to implement the BART alternative.

Every year after 2018, sulfur dioxide emissions will be lower under the BART alternative than under the original BART. Eastman Chemical Company was one of the first industrial sources nationally to agree to emissions reductions for BART. We commend Eastman's willingness to act in 2008 and we support TDEC's proposed BART alternative for Eastman now.

We appreciate the opportunity to work closely with TDEC and the U.S. Environmental Protection Agency to make progress toward achieving natural visibility conditions at our National Parks and Wilderness Areas.

For further information regarding our comments, please contact Pat Brewer at (303) 969-2153.

Sincerely,

Susan Johnson
Chief, Policy, Planning, and Permit Review Branch

cc:
Beverly Bannister, Director
Air, Pesticides, and Toxics Management Division
U.S. Environmental Protection Agency, Region 4
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