

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
ONE CONGRESS STREET SUITE 1100  
BOSTON, MASSACHUSETTS 02114-2023



**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

May 20, 2008

Daniel Welch, Manager  
Health, Safety, Environmental & Quality  
Bostik, Inc.  
211 Boston, Street  
Middleton, MA 01949-7232

RE: Approval of the Trial Burn (TB)/ MACT Comprehensive Performance Test (CPT) Plan for the Polyester Burning Unit - Revision 2, Volume II of III dated January 31, 2008 located in Middleton, MA;  
EPA I.D. No. MAD001039767

Dear Mr. Welch:

The Environmental Protection Agency (EPA) has reviewed in coordination with the Massachusetts Department of Environmental Protection (MADEP) the Trial Burn (TB)/ MACT Comprehensive Performance Test (CPT) Plan for the Polyester Burning Unit - Revision 2, Volume II of III dated January 31, 2008 of the Bostik, Inc. (Bostik) Part B Permit Application and hereby approves the Plan.

The approval is also subject to the following conditions:

1. Bostik shall incorporate the enclosed EPA comments for the Trial Burn Plan / MACT CPT Plan for the Polyester Burner Unit – Revision 2 (January 31, 2008) Volume II of III.
2. Bostik shall within seven (7) days of the receipt of this letter, notify EPA and MADEP in writing the commencement date of the trial burn/CPT.
3. No testing shall be conducted unless an official observer assigned by the regulatory agency is present. The individual so designated will have the authority to:
  - a. Order the cessation of all testing upon his or her determination of a system malfunction or violations of the conditions of this letter;
  - b. Approve changes during the trial burn/CPT; and
  - c. Order a restart of the trial burn/CPT after a malfunction or process upset that stopped the testing has been identified and corrected to the official observer's satisfaction.

EPA and MADEP reserve the right to send any number of observers deemed appropriate. One individual and an alternate will be identified as the official observer with the above authority. The main contact in any rescheduling in the case of malfunctions or delays will be Stephen Yee of the EPA. The official observer for the trial burn will be William Osbahr of the EPA and his alternate will be Jerry Keefe.

4. A fourth sampling run will be conducted and the samples kept in reserve in the event that data is lost from any of the first three (3) runs. In the event that the samples from the fourth run are analyzed, the analytical data must be submitted for all four (4) runs. Bostik may not select the best three (3) run results if the fourth run is analyzed.
5. The name of the person responsible for the logging of the process data shall be provided to the official observer before the start of the trial burn/CPT.
6. Copies of the calibration data for the facility's process monitoring equipment associated with the operation of the Polyester Burning (Struthers-Well) unit during the trial burn/CPT shall be provided to the official observer before the first test run. In addition, a list of the process equipment that is to be monitored during the test shall also be provided to the official observer at the same time.
7. Copies of the calibration data for all emission testing equipment, including the sampling train components, filter weights and serial numbers, thermocouples, and standard gases shall be provided to the official observer before the first test run.
8. The CEM PST data shall also be provided before the commencement of the trial burn/CPT.
9. The applicant shall submit to EPA and MADEP, a certification that the trial burn has been carried out in accordance with the approved trial burn/CPT plan, and the trial burn report/Notice of Compliance documenting all determinations required by this approval and 40 CFR 270.22, 270.66, 63.1207(j), 63.1210(d), and 63.1217 within ninety (90) days of the completion of the trial burn. This report shall be certified on behalf of the applicant by the signature of a person authorized to sign a permit application or a report in accordance with 40 CFR 270.11 and 310 CMR 30.807.
10. All data collected during the trial burn/CPT shall be submitted to EPA and MADEP following the completion of testing.
11. After the completion of the trial burn/CPT, copies of calibration data, zero span, and drift test conducted on CEM's during the trial burn for each test run shall be provided to the official observer.

Additionally, if you wish to claim confidentiality on any new information, please submit a claim in accordance with 40 CFR Part 270.12.

We request that three (3) copies of the Trial Burn Report/Notice of Compliance and an electronic version of the document be sent to the EPA and Massachusetts Department of Environmental Protection (MADEP) at the following addresses:

U.S. EPA - Region I - New England  
Hazardous Waste Unit  
Office of Ecosystem Protection  
One Congress Street, Suite 1100 (CHW)  
Boston, Massachusetts 02114-2023  
Attention: Stephen Yee

and

Massachusetts Department of Environmental Protection  
Northeast Region  
205B Lowell Street  
Wilmington, MA 01887  
Attention: Tom Parks

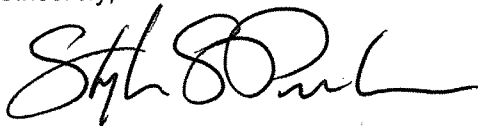
One copy should be sent to the Massachusetts Department of Environmental Protection (MADEP) office at the following address:

Massachusetts Department of Environmental Protection  
Bureau of Waste Prevention, Business Compliance Division  
One Winter Street, 8th Floor  
Boston, MA 02108  
Attention: Jim Miller

Please include this approval letter in your public records repository to ensure a complete administrative record is available for public review.

If you have any questions, please do not hesitate to contact Stephen Yee of my staff at (617) 918-1197 or at yee.steve@epa.gov.

Sincerely,



Stephen S. Perkins, Director  
Office of Ecosystem Protection

Enclosures

cc: Jim Miller, MADEP  
Jeff Chormann, MADEP  
Tom Parks, Northeast Region, MADEP  
Stephen Yee, EPA  
Deborah Brown, EPA  
Lisa Papetti, EPA  
Steve Rapp, EPA  
Susan Lancey, EPA  
Jerry Keefe, EPA  
William Osbahr, EPA  
Cynthia Kaleri, EPA