



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

March 6, 2025

By Email

**URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE**

Ms. Traci Revis, Plant Manager
Bostik, Inc.
211 Boston Street
Middleton, MA 01949

Re: Clean Air Act Reporting Requirement

Dear Ms. Revis:

The United States Environmental Protection Agency ("EPA") is evaluating whether Bostik, Inc. ("Bostik") is in compliance with the Clean Air Act ("CAA" or "Act") and requirements promulgated under the Act at its facility located at 211 Boston Street, Middleton, MA (the "Facility"). In particular, EPA is evaluating if the Facility is subject to the National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources, found at 40 C.F.R. Part 63, Subpart VVVVVV, ("Subpart 6V"). EPA is also evaluating Bostik's compliance with the federally enforceable conditions of the Facility's Non-Major Comprehensive Plan Approval ("CPA"): NE-22-011, issued February 27, 2023, by the Massachusetts Department of Environmental Protection ("MassDEP").

Section 112 of the CAA, 42 U.S.C. § 7412, lists hazardous air pollutants ("HAPs") and requires EPA to establish National Emissions Standards for Hazardous Air Pollutants ("NESHAPs") for these HAPs. EPA has promulgated NESHAPs in 40 C.F.R. Part 63 to regulate specific categories of stationary sources that emit (or have the potential to emit) one or more HAPs. The NESHAPs include, among others, Subpart 6V.

The Facility's CPA was issued by MassDEP in accordance with 310 CMR 7.02 "Plan Approval and Emission Limitations," which is in the "Air Pollution Control" regulations at 310 CMR 7.00. 310 CMR 7.00 is part of MassDEP's federally approved State implementation Plan ("SIP"). A SIP is a collection of regulations and documents used by a state, territory, or local air district to implement, maintain, and enforce the National Ambient Air Quality Standards, or NAAQS, and to fulfill other requirements of the Clean Air Act. The control measures/regulations that are approved by EPA as part of a SIP are federally enforceable.

The CPA restricts emissions of volatile organic compounds ("VOCs") and HAPs emitted from the polyurethane and polypropylene resin manufacturing equipment, adhesive film coating line and

associated air pollution control equipment. The emissions from the polyester and polyurethane manufacturing process equipment (“PPMPE”) are vented to a process vent header pipe (“vent header”). The emissions from the vent header and the film coating line (“FCL”) are routed to a regenerative thermal oxidizer (“RTO”) for control of VOC and HAP emissions. The RTO, identified in the CPA as, Pollution Control Device Regenerative Thermal Oxidizer (“PCD-RTO”), is an L & E America Model No. TR20.5-95C RTO.

Ground-level ozone, which is a major component of “smog,” is formed in the atmosphere by reactions involving VOCs and oxides of nitrogen (“NOx”) in the presence of sunlight. To reduce ground level ozone levels, emissions of VOC and NOx must be reduced. Exposure to ground-level ozone is associated with a wide variety of human health effects, agricultural crop loss, and damage to forests and ecosystems. The most thoroughly studied health effects of exposure to ozone at elevated levels during periods of moderate to strenuous exercise are the impairment of normal functioning of the lungs, symptomatic effects, and reduction in the ability to engage in activities that require various levels of physical exertion.

HAPs, also known as toxic air pollutants or air toxics, are those pollutants that are known or suspected to cause cancer or other serious health effects, such as damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory effects or birth defects, or have other adverse environmental effects.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether such person is in compliance with the Act and its implementing regulations.

Within **60 days** of the date Bostik receives this letter, provide the information requested below. Provide all documents electronically via email to EPA at peltier.karen@epa.gov¹. Please use the Excel spreadsheets provided in Attachment A to provide the data requested in Sections II and III of this request.

I. Facility Description

- a. Current flow diagram(s), and piping and instrumentation diagram(s) that depict the configuration of the vent header and air pollution control system and the processes that lead to the vent header and air pollution control system. Sufficient detail shall be provided to show all process equipment that is connected to the vent header and air pollution control system as well as the monitoring instrumentation, controls and safety equipment (i.e. isolation valves, knock-out pots, flame and detonation arrestors) for the vent header, as detailed in the CPA.

¹ Note that EPA cannot receive email messages with files larger than 25 MB. If your submissions are larger than 25 MB, please zip the files or send separate email messages. Alternatively, EPA can set up a One Drive folder and email you a link so that you can upload the information into that folder.

II. Subpart 6V

Identify all HAPs that are present in any chemical manufacturing process unit ("CMPU")² owned or operated by Bostik at the Facility that are listed in the table provided in Attachment B of this letter ("Subpart 6V HAPs"), where at least one of the following conditions exist³.

- a. The CMPU uses as feedstock, any material that contains quinoline, manganese, and/or trivalent chromium at an individual concentration greater than 1.0 % by weight, or any other Subpart 6V HAPs at an individual concentration greater than 0.1 % by weight⁴.
- b. Quinoline is generated as byproduct and is present in the CMPU in any liquid stream (process or waste) at a concentration greater than 1.0 % by weight.
- c. Hydrazine and/or Subpart 6V HAPs other than quinoline are generated as byproducts and are present in the CMPU in any liquid stream (process or waste), continuous process vent, or batch process vent at an individual concentration greater than 0.1 % by weight.
- d. Hydrazine or any Subpart 6V HAPs is produced as a product of the CMPU.

III. CPA NE-22-011

For the period from January 1, 2023 through January 1, 2025, provide the following information:

- a. For the RTO:
 - i. The minimum RTO combustion temperature (°F) limits and corresponding equipment setpoints, either as described in the permit or established via performance testing, and the periods of time when they were applicable.
 - ii. Operating combustion chamber temperature data for the RTO, provided in hourly block averages.
- b. For periods of time when malfunctions, interlock activations and/or bypasses occurred:
 - i. Provide information describing all malfunctions of the RTO and/or all instances where the interlock system was activated to isolate the RTO from the emissions stream, including:

² A CMPU includes all process vessels, equipment, and activities necessary to operate a chemical manufacturing process that produces a material, or a family of materials described by North American Industry Classification System (NAICS) code 325. A CMPU consists of one, or more, unit operations and any associated recovery devices. A CMPU also includes each storage tank, transfer operation, surge control vessel, and bottoms receiver associated with the production of such NAICS code 325 materials.

³ Do not include information for CMPUs that are subject to: 40 CFR Part 63 Subpart IIIII; 40 CFR part 63, Subpart DDDDDD; 40 CFR Part 63, Subpart LLLLLL; 40 CFR Part 63, Subpart MMMMMM; 40 CFR Part 63, Subpart NNNNNN; 40 CFR Part 63, Subpart PPPPPP; or 40 CFR Part 63, Subpart CCCCCC.

⁴ To determine the Table 1 HAP content of feedstocks, you may rely on formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet (MSDS) for the material. If the concentration in an MSDS is presented as a range, use the upper bound of the range.

1. The date and time the malfunction occurred, and identification of each interlock system related to the vent header/RTO system that was activated;
 2. The cause of the malfunction or reason the interlock system was activated;
 3. The products being produced in each PPMPE and/or the FCL when the malfunction occurred or the interlock system was activated, including an estimate of the VOC/HAP emissions generated by each product (lb./hr.)⁵.
 4. The lower explosive limit (%), flow rate (scfm) and pressure (Inches of H₂O)⁶ in the vent header when the malfunction occurred, or the interlock system was activated;
 5. The corrective actions taken; and
 6. The date and time corrective actions were initiated and completed.
- ii. Records of the utilization of the RTO emergency bypass damper⁷, including:
1. The date and time the RTO emergency bypass damper was utilized;
 2. The reason the RTO emergency bypass damper was utilized;
 3. The products being produced in each PPMPE and/or the FCL when the RTO emergency bypass damper was utilized, including an estimate of the VOC/HAP emissions generated by each product (lb./hr.).
 4. The lower explosive limit (%) and pressure (Inches of H₂O) in vent header when the RTO emergency bypass damper was utilized;
 5. The corrective actions taken; and
 6. The date and time corrective actions were initiated and completed.
- iii. Records of all malfunctions of the PPMPE and/or the FCL that resulted in an increase in air contaminant emission rates from the equipment⁸, including:
1. The date and time the malfunction occurred;
 2. The reason for the malfunction;

⁵ If an emission rate (lb./hr.) is unavailable, provide an estimate of the total emissions from the production of the product.

⁶ At all three locations where pressure is being monitored.

⁷ Do not include the event if it is already described in Section III.b.i.

⁸ Do not include the event if it is already described in Sections III.b.i. or III.b.ii.

3. The products being produced in each PPMPE and/or the FCL when the malfunction occurred, including an estimate of the VOC/HAP emissions generated by each product during the malfunction (lb./hr.).
4. The lower explosive limit (%) and pressure (Inches of H2O) in vent header when the malfunction occurred;
5. The corrective actions taken; and
6. The date and time corrective actions were initiated and completed.

Be aware that if Bostik does not provide the information required in a timely manner, EPA may order it to comply and may seek monetary penalties under Section 113 of the Act. Federal law establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you.

If you have any questions regarding this Reporting Requirement, please contact Karen Peltier of my staff at (617) 918-1613 or via email at peltier.karen@epa.gov.

Sincerely,

JAMES CHOW

Digitally signed by JAMES
CHOW
Date: 2025.03.06 16:42:48
-05'00'

James Chow, Director
Enforcement and Compliance Assurance Division

ENCLOSURES:

Attachment A: 114 Data Request Excel Spreadsheets

Attachment B: Table of Subpart 6V HAPs

LINKS:

EPA's Small Business Resources Information Sheet: <https://www.epa.gov/compliance/small-business-resources-information-sheet>

By electronic cc: Ed Braczyk, MassDEP
Mun Wong, MassDEP

ATTACHMENT A

BOSTIK EXCEL DATA REQUEST SPREADSHEETS⁹

⁹ Please supply information electronically in Excel data files.

Subpart 6V DATA

[illegible]

RTO Combustion Chamber Setpoints

[illegible]

RTO Combustion Chamber Operating Temperature

[illegible]

MALFUNCTIONS, INTERLOCKS & BYPASS DATA

[illegible]

ATTACHMENT B

Table 1 to Subpart VVVVVV of Part 63—Hazardous Air Pollutants Used to Determine Applicability of Chemical Manufacturing Operations

Chemical Name (CAS No.)
1,3-butadiene (CAS No 106990)
1,3-dichloropopene (CAS No. 542756)
Acetaldehyde (CAS No. 75070)
Chloroform (CAS No. 67663)
Ethylene dichloride (CAS No. 107062)
Hexachlorobenzene (CAS No. 118741)
Methylene chloride (CAS No. 75092)
Quinoline (CAS No. 91225)
Arsenic compounds
Cadmium compounds
Chromium compounds
Lead compounds
Manganese compounds
Nickel compounds
Hydrazine (CAS No. 302012)