



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 Post Office Square, Suite 100
BOSTON, MASSACHUSETTS 02109-3912

February 16, 2010

Mr. Daniel Welch
Corporate Environmental Manager
Bostik, Inc.
211 Boston Street
Middleton, MA 01949-7232

Re: Certification of Partial Closure
Tanks T-1 and T-2
EPA I.D. No. MAD001039767

RCRA RECORDS CENTER
FACILITY Bostik
I.D. NO. MAD001039767
FILE LOC. R-1B
NUMBER 109441



RDMS DocID

109441

Dear Mr. Welch:

The Environmental Protection Agency (EPA) has reviewed the Certification of Partial Closure (Certification) for Tanks T-1 and T-2 dated April 15, 2009. The Certification was prepared by Triumvirate Environmental, Inc. on behalf of Bostik, Inc. (Bostik). The Certification covers the closure of two 8,800 gallon aboveground hazardous waste storage tanks identified as Tanks T-1 and T-2. These tanks were used to store polyester distillate, a hazardous waste, prior to being burned in a Struthers-Wells industrial boiler. The existing tanks were replaced with two 8,000 gallon tanks.

The Certification of Partial Closure is in compliance with the requirements of 40 CFR Part 265, Subpart G and it documents that Bostik has closed Tanks T-1 and T-2 in accordance with the approved closure plan dated March 2008, as amended. In addition, EPA conducted site visits on September 30, 2008 and May 7, 2009 and confirmed that all closure activities have been implemented and completed.

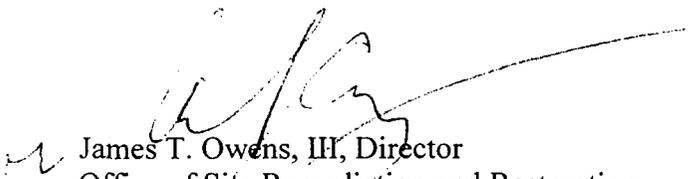
Please note that since hazardous waste generation and storage is continuing at this location, the financial assurance requirements of 40 CFR 265, Subpart H, continue to apply. In addition, nothing in this approval relieves Bostik of any liability for releases into the environment heretofore undetected, unknown or not directly related to the operation of the storage tanks.

You should be aware that after further discussions with the Massachusetts Department of Environmental Protection (MassDEP) and our legal counsel, we have decided that Bostik, for its BIF permit application, will not be required to comply with the more stringent hazardous waste requirements under the Massachusetts regulations. Rather, you will be required to comply with all applicable federal RCRA requirements. This revises our interpretation previously set forth in EPA's May 31, 2006 correspondence (re: Updating the Part B Permit Application for the Struthers - Wells Boiler). This revision is based on the fact that the MassDEP is not authorized for the BIF element of the RCRA program, and thus it is the federal BIF requirements that apply in Massachusetts. However, we strongly encourage you to comply with the more stringent

Massachusetts requirements, and you will need to do so in the event Massachusetts should become authorized for the BIF program element in the future.

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

Sincerely,



James T. Owens, III, Director
Office of Site Remediation and Restoration

cc: James Miller, Mass DEP, Boston
Jeff Chorman, Mass DEP, Boston
Ed Pawlowski, Mass DEP, Northeast Regional Office
Stephen Yee, EPA
Stuart Gray, EPA
Frank Battaglia, EPA
James Chow, EPA
Lisa Papetti, EPA
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