

## **SYNTHETIC MINOR DETERMINATION**

**SOURCE DESCRIPTION:** HFI, Inc. applies a solvent -based adhesive (Bostik 4420) in four spray booths for assembly of automotive trim. Two booths (R002 & R004), in which vinyl and metal parts are bonded, are limited by a BAT determination to 6.7 lbs VOC/hr and 6.93 tons VOC/yr each. The VOC content in Bostik 4420 is 5.41 lbs/gallon and is considered non-photochemically reactive. For two booths used to bond plastic and vinyl, BAT determinations restrict the emission rate to 13.9 lbs OC/hr and 9.9 tons OC/yr. in R001 and to 12.5 lbs OC/hr and 10.6 tons OC/yr from R005.

**FACILITY EMISSIONS/ATTAINMENT STATUS:** HFI, Inc reported emissions of 16.65 tons VOC/yr in 1994 of which 13 tons were from Bostick 4420 adhesive. Methyl ethyl ketone (MEK) is listed at 37.9% by weight of Bostik 4420 and is listed as a hazardous air pollutant. Under permit allowable restrictions, HFI has the potential to emit 35.37 tons VOC/year with a corresponding emission rate of MEK that would exceed the 10 ton/year threshold for Title V permitting.

**PROPOSED USAGE RESTRICTIONS:** HFI proposes to restrict the application of Bostik 4420 in the four booths to 7,350 gallons per rolling 12 month period. At this annual restriction, the emission would be limited to 9.83 tons MEK per year and 14.96 tons total HAPS per year.

**CONCLUSIONS:** By incorporating this usage restriction into the four permits to operate with daily recordkeeping and annual reporting, the facility will stay below the threshold for Title V permitting.