





## REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

117 South Main Street, Dayton, Ohio 45422-1280

937-225-4435 — Fax: 937-225-3486

www.rapca.org

October 28, 2008

### Certified Mail

William R. Mullins, Jr.  
Mullins Rubber Products, Inc.  
2949 Valley Street  
Dayton, Ohio 45424

RE: OEPA Facility ID 0857770747  
Exceedance of Rolling 12-Month Facility-Specific Hazardous Air Pollutant (HAP)  
Emission Limit

Dear Mr. Mullins:

### WARNING LETTER

On August 4, 2008, the Regional Air Pollution Control Agency (RAPCA) received a compliance report satisfying both the second quarter and first half semi-annual 2008 reporting requirements for Mullins Rubber Products, Inc., located at 2949 Valley Street in Dayton, Ohio. The compliance report included the actual rolling 12-month hazardous air pollutant (HAP) emissions for the periods ending April 30, May 31, and June 30, 2008, for emissions unit (EU) K001 (Miscellaneous Metal Parts and Plastic Parts Coating Booth). As stated in the above referenced report, Mullins Rubber Products, Inc. exceeded the rolling 12-month facility-specific HAP emission limit as specified in 40 CFR 63 Subpart M MMM (Miscellaneous Metal Parts and Products Surface Coating), 40 CFR 63 Subpart P PPP (Surface Coating of Plastic Parts and Products), Permit to Install (PTI) 08-04782, issued December 19, 2006, and the Title V operating permit, issued December 26, 2007, for EU K001.

Specifically, Parts II.A.2, II.A.3 and III.A.1.1 of PTI 08-04782 and the Title V operating permit for EU K001 state that the permitted facility is subject to the applicable emission limitations specified in Subpart M MMM of 40 CFR Part 63 in accordance with 40 CFR Parts 63.3880 – 63.3981, as well as Subpart P PPP of 40 CFR Part 63 in accordance with 40 CFR Parts 63.4480 – 63.4581, including any referenced tables or appendices. The actual rolling 12-month HAP emissions (in pounds of HAP per gallon of solids) for EU K001 were 34.55 (period ending April 30), 34.64 (period ending May 31) and 34.62 (period ending June 31). The rolling 12-month facility-specific HAP emission limits (in pounds of HAP per gallon of solids) for EU K001 were 34.10, 34.03 and 33.51, respectively.

Mullins Rubber Products, Inc.

October 28, 2008

Page 2

Exceeding the rolling 12-month facility-specific HAP emission limit is a violation of 40 CFR 63 Subparts M MMM and P PPP, PTI 08-04782, and the Title V operating permit for EU K001.

RAPCA acknowledges that Mullins Rubber Products, Inc. has submitted a compliance plan (including the primary cause of the deviation and the corrective actions that have and/or will be taken to ensure future compliance) with the compliance report. RAPCA appreciates the timely manner in which Mullins Rubber Products, Inc. is resolving this matter. Future violations may result in escalated enforcement action.

If you have any question regarding this matter, feel free to contact me at (937)225-4453.

Sincerely,



Lesley A. Jenkins

Air Pollution Control Specialist

Cc:	Jeff Canan	RAPCA
	Lisa Holscher	USEPA
	Tom Kalman	OEPA

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

WILLIAM R MULLINS  
**MULLINS RUBBER PRODUCTS INC**  
 2949 VALLEY STREET  
 DAYTON, OH 45424

2. Article Number  
 (Transfer from service label)

7008 1300 0001 9322 4301

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *Gailhei Ingersoll*

Agent

Addressee

B. Received by (Printed Name)

J. Ingersoll

C. Date of Delivery

10/29/08

D. Is delivery address different from item 1?  Yes

If YES, enter delivery address below:  No

3. Service Type

Certified Mail  Express Mail

Registered  Return Receipt for Merchandise

Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

U.S. Postal Service™

**CERTIFIED MAIL™ RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

*Official Use*

Postage \$

Certified Fee

Return Receipt Fee  
 (Endorsement Required)

Restricted Delivery Fee  
 (Endorsement Required)

Postmark  
 Here

WILLIAM R MULLINS  
**MULLINS RUBBER PRODUCTS INC**  
 2949 VALLEY STREET  
 DAYTON, OH 45424

PS Form 3800, August 2006

See Reverse for Instructions

7008 1300 0001 9322 4301