



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 5  
 AIR AND RADIATION DIVISION  
 77 WEST JACKSON BOULEVARD  
 CHICAGO, IL 60604-3590

DATE: 6/4/08

SUBJECT: Recommendation to Issue a Notice and a Finding of Violation to BRC Rubber & Plastics, Inc., Montpelier, Indiana

FROM: George T. Czerniak, Chief  
 Air Enforcement and Compliance Assurance Branch

TO: Cheryl L. Newton, Acting Director  
 Air and Radiation Division

I recommend that you issue a Notice and Finding of Violation (NOV/FOV) to BRC Rubber & Plastics, Inc. (BRC), for violating the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (Subpart M MMM), and the Montpelier, Indiana facility's Title V Operating Permit.

Specifically, the BRC facility had emissions from its coating operations in excess of the emission limit of 37.7 pounds HAPs/gallons coating solids used, during the initial 12-month compliance period, as required by Subpart M MMM. This was determined by information submitted by BRC in a Notification of Compliance Status Report. This exceedance constitutes a violation of Subpart M MMM, the facility's Title V Operating Permit, and the Clean Air Act.

For these reasons, I recommend that you issue the attached NOV/FOV.

State Representative Contacted: Craig Henry  
 Date: 6/4/08  
 By: [Signature]

Attachments