OhioEPA
State of Ohio Environmental Protection Agency

PERMIT TO OPERATE AN AIR CONTAMINANT SOURCE

Date of Issuance 06/18/91 Application No. 15760000748001

Effective Date 06/18/91 Permit Fee $100

This document constitutes issuance to:

EMAL INC., ESSROC MATERIALS INC.
8282 MIDDLEBRANCH AVE NE
MIDDLEBRANCH OHIO 44652

of a permit to operate for:

PLANT ROADWAYS AND PARKING AREAS
PLANT ROADWAYS AND PARKING AREAS

The following terms and conditions are hereby expressly incorporated into this permit to operate:

1. This permit to operate shall be effective until 06/17/94
   You will be contacted approximately six months prior to this date regarding the renewal of this permit. If you are not contacted, please write to the appropriate Ohio EPA field office.
2. The above-described source is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.
3. Prior to any modification of this source, as defined in rule 3745-31-01 of the Ohio Administrative Code (OAC), a permit to install must be granted by the Ohio EPA pursuant to OAC Chapter 3745-31.
4. The Director of the Ohio EPA or an authorized representative may, subject to the safety requirements of the permit holder, enter upon the premises of this source at any time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit.
5. A permit fee in the amount specified above must be remitted within 15 days from the issuance date of this permit.
6. Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA field office must be notified in writing of any transfer of this permit.
7. This source and any associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices in order to minimize air contaminant emissions. Any malfunction of this source or any associated air pollution control system(s) shall be reported immediately to the appropriate Ohio EPA field office in accordance with OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this source.
8. Any unauthorized or emergency release of an air contaminant from this source which, due to the toxic or hazardous nature of the material, may pose a threat to public health, or otherwise endanger the safety or welfare of the public, shall be reported immediately to the appropriate Ohio EPA field office (during normal business hours) or to the Ohio EPA's Emergency Response Group (1-800-282-9378). (Additional reporting may be required pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act.)
9. The appropriate Ohio EPA field office is:
   DIV. OF AIR POLLUTION CNTRL CANTON CITY HEALTH DEPT.
   THIRD FLOOR, CITY HALL
   CANTON, OH 44702 (216) 489-3385
10. ☒ If this term and condition is checked, the permit holder is subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY

RECEIVED
JUN 11 1991
CANTON CITY HEALTH DEPT
AIR POLLUTION DIVISION

Donald R Schregardus
Director

EPA 3834
Revised 9-90

23-S

APPLICATION NUMBER: 15 76 00 0074 F00

FACILITY NAME: EMAI, Inc.

EQUIPMENT DESCRIPTION: Plant Roadways and Parking Areas

COMPANY ID: Plant Roadways and Parking Areas

SPECIAL TERMS AND CONDITIONS

1. The following rules of the Ohio Administrative Code establish the applicable emission limitations and/or control requirements of this source:

   3745-17-08

   (This condition in no way limits the applicability of other requirements of the Ohio Administrative Code to this source.)

2. <u>For Fugitive Dust Sources:</u>

   The allowable mass emission limitation requirements for the property identified above is specified in the following table:

Property	Control Requirements
Roadways & parking areas	A. Fugitive dust from plant roadways and parking lots shall be controlled so as to minimize or eliminate visible emissions. B. Paved surfaces shall be cleaned by sweeping and/or water flushing as needed. C. Unpaved surface shall be treated with a suitable dust suppressant as often as necessary to minimize or eliminate visible emissions of fugitive dust.

3. <u>Record-keeping and reporting requirements for fugitive dust control measures applied to all roadways and parking areas</u>:

   This facility shall maintain monthly records which list the following information for all parking areas and roadways:

   a. Date and time when sweeping, flushing, or dust suppressants were applied to the subject roadways and parking areas.

b. Cite the specific type control measure used, who performed the application, and what particular roadway segments and parking areas received the fugitive dust control applications.

c. These monthly reports shall be retained in the company's file for a period of not less than 2 years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

4. Speed limits of 15 MPH or less will be posted and enforced on all plant roadways.

5. When waste oil is used for controlling fugitive dust from the unpaved road segments and parking lots, the following restrictions shall be followed:

a. U.S. Cement Co. shall certify or possess certification that all waste oil used to control fugitive dust meets the PCB limitations set forth in 40 CFR 761, and that there are no listed hazardous waste or characteristic hazardous waste as set forth in 40 CFR 261.

b. A record should be kept for one year of the quantity of all oil applied, and its certificate of compliance with 40 CFR 761 and 40 CFR 261. This certificate of compliance should include, but not be limited to, the name of the oil supplier and an analysis of the oil.

The analysis shall include a standard PCB test (gas chromatography using electron capture detector, using a column packing of OV-1 or OV-17 and a florisil clean-up) and representative sampling methods as specified in 40 CFR 261, Appl. I, II, III. This record shall be made available to the Director or his authorized representative for inspection.

c. Waste oil shall be applied in such a manner as to prevent pollution of water of the state as required by the Ohio Revised Code, Section 6111.

d. Waste oil should be applied only to unpaved roads and parking lot surfaces only between sunrise and sundown (daylight hours).

e. Waste oil shall not be applied to a water saturated surface nor to surfaces on days of predicted rainfall.

f. Waste oil shall not be applied at an application rate that allows pooling of liquid.

g. Waste oil shall not be applied to the same surface more frequently than twice per week.

h. The application of waste oil shall not cause runoff from the application surface.

i. Waste oil shall not be applied to vegetation near or adjacent to surfaces being treated.

j. Waste oil shall not be applied within 12 feet of structures crossing bodies of water or drainage ditches.

k. The discharge of waste oil must stop when applicator vehicle stops.

l. The applicator vehicle must be moving at least five (5) MPH at all times while the waste oil is being applied.

m. The applicator vehicle discharge valve shall be locked closed between the waste oil collection point and the specified surfaces which have been approved for waste oil application.

n. Any valves that provide for tank draining other than through the spreader bar must be locked closed during waste oil application and transport. The angle of discharge from the applicator vehicle spreader bar shall not be greater than 60 degrees from the perpendicular to the unpaved surfaces.

PREPARED BY: DANIEL J. SCHILTZ
DATE PREPARED: 3/15/91