

Air Pollution Control Division

Canton City Health Department

420 Market Avenue North • Canton, Ohio • 44702-1544
(330) 489-3385 • Fax: (330) 489-3335

James M. Adams, R.S., MPH
Health Commissioner

Terri Dzienis
APCD Administrator



October 4, 2012

CERTIFIED MAIL

Brian Lester, Plant Manager
Gregory Industries, Inc.
4100 13th Street SW
Canton, OH 44710

Re: RESOLUTION OF VIOLATION

Gregory Industries, Inc.

Location: 4100 13th Street SW, Canton, OH 44710, Stark County

Facility ID: 1576051532

Dear Mr. Lester:

On August 24, 2012, I sent you a Notice of Violation (NOV) letter describing our findings of violations of the terms and conditions contained in PTI 15-1227 and/or the PTO issued 12/23/1996. All of the findings involved emissions unit F001, roadways and parking areas, both unpaved and paved.

Our requested action to resolve these violations was for you to submit a PTIO application to replace your previous PTO renewal application received on 8/15/2005. We recommended that you apply for two General Permits, one for unpaved roadways and parking areas, and the other for paved roadways and parking areas. We further requested that you submit the PTIO application within 30 days of receiving the NOV letter. We received your application on September 18, which was within the 30-day period. Thank-you for giving prompt attention to this matter.

In order to process the two General Permits, it was necessary for me to redefine F001 to include unpaved surfaces only (GP5.1), and to create F002 for paved surfaces (GP6.1).

On October 2, 2012, PTIO No. P0111326 for F001 and F002 was issued by Ohio EPA. The new permit supersedes PTI No. 15-1227 and, because it is a Permit-to-Install *and* Operate, it also renews the PTO issued 12/23/1996. Regarding the violations of dust suppression requirements for unpaved roadways and parking areas described in Finding 1 of the NOV letter, please note that the General Permit Terms and Conditions that now apply are based on daily inspections to determine the need for dust control measures, rather than specific application frequencies. Regarding Findings 2 – 4 in the NOV letter, the new permit no longer includes the specific Terms and Conditions for which you were cited as violating, so you have ceased to be in violation of those requirements.

Please note that even though the violations documented in the 8/24/2012 NOV letter have been resolved, this does not preclude the Ohio EPA from seeking civil penalties pursuant to Section 3704.06 of the Ohio Revised Code (ORC). The decision on whether or not to seek such penalties in

this case is dependent upon several factors, one of which is the facility's future compliance with applicable Ohio EPA requirements.

If you have any questions, please contact me at the phone number or email address shown below.

Sincerely,

A handwritten signature in black ink that reads "Carl Safreed". The signature is written in a cursive style with a large, prominent "C" and "S".

Carl Safreed, P.E.
Air Pollution Control Engineer
Canton City Health Department
direct line 330-438-4682
csafreed@cantonhealth.org

cc: Bruce Weinberg, Central Office, Ohio EPA
William MacDowell, Region 5 U.S. EPA
Terri Dzienis, APC Division, Canton City Health Department