State of Ohio Environmental Protection Agency

**Southeast District Office**

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

June 25, 2010

**RE:** Hardin County
Facility ID: 0664960006
Facility ID: 0664960007
Facility ID: 0664960070
Facility ID: 0664000134
Inspection/Warning Letter

**Certified: 70073020000178849736**

Ms. Beth Mowrey
Director of Environmental Permitting and Compliance
The Shelly Company
P.O. Box 266
Thornville, Ohio 43076

**Subject: Results of Inspection Conducted on Allied Generator 21.0010, Allied Generator 21.0011, Stoneco Generator 21.8803, and Stoneco Generator 21.8804.**

Dear Ms. Mowrey:

On May 19, 2010, Michael Carper and I visited your facility located at 3798 State Route 53, Forest, OH. The purpose of this visit was to determine the compliance status with applicable federal and State environmental laws and regulations for the following emissions units:

| Facility ID: | Facility |
|---|---|
| 0664960006 | Allied Corporation Equipment 21.0010 |
| 0664960007 | Allied Corporation Equipment 21.0011 |
| 0664000134 | Stoneco Portable Genset 21.8803 |
| 0664960070 | Stoneco Portable Genset 21.8804 |

***Stoneco Portable Genset 21.8804 Facility ID 0664960070:***
This generator was not operating at the time of inspection. It had been removed from service due to antifreeze leaking into the gas tank; however, based on our review of the operation logs, please see the inspection determination below for Stoneco Portable Genset 21.8803 for the corrective action needed for this emissions unit.

***Allied Equipment 21.0010 Facility ID 0664960006:***
The current location on file for this facility is Findlay Shop (Storage). As a result of our inspection, we are now aware that Allied Generators 21.0010 and 21.0011 travel together in the same trailer, do not typically operate simultaneously, but appear to be able to, and that The Shelly Company considers the non-operating generator in the trailer to be "in storage". While we understand your view, the situation could be problematic. Moving the generators together does raise concerns about the potential for both generators to be in service at the same site even though one is considered to be "in storage" and about the site-specific potential emissions when evaluating whether other State and/or federal permitting requirements are triggered. Until we can agree on an appropriate, uniform approach for addressing this situation, we request that you clearly indicate and confirm on any ITR filed for only Allied Generator 21.0010 or 21.0011 which generator will be considered to be "in storage". If you have any other information documenting that the electrical configuration or fuel delivery system of the trailer will preclude both generators from operating simultaneously, we would appreciate having the information to support any resolution of this situation.

Administrative Warning for the following facilities:

***Allied Equipment 21.0011 Facility ID 0664960007 and Stoneco Portable Genset 21.8803 Facility ID 0664000134:***
Allied Equipment 21.0011 was recently approved for relocation on April 19, 2010, to the Forest Quarry and has replaced Stoneco Portable Genset 21.8804. During my review of the operation logs, I noticed that the hours of operation being recorded for Allied Equipment 21.0011 were under the hours of operation for Stoneco Portable Genset 21.8803. No operating log was available for Allied equipment 21.0011. Since Allied Equipment 21.0011 is being recorded as Stoneco Portable Genset 21.8803, Ohio EPA is requesting The Shelly Company to submit revised copies of the monthly and rolling operating logs indicating the correct hours of operation with the appropriate generator as required by the monitoring and recordkeeping requirements of the applicable permits-to-install.

The same issue has occurred for Stoneco Portable Genset 21.8803. During my review of the operation logs for this equipment, I observed that the Stoneco Portable Genset 21.8803 operation hours were being logged under Stoneco Portable Genset 21.8804's operating hours. Ohio EPA is also requesting The Shelly Company to submit revised copies of the monthly and rolling operating logs for these emissions units indicating the correct hours of operation with the appropriate generator as required by the monitoring and recordkeeping requirements of the applicable permits-to-install.

Please submit the above-requested information within 14 days of receiving this letter.

If you are unable to respond to any part of this request within the time frame discussed above, please inform us and explain so that we may be of assistance. Should you have any questions regarding this matter, please contact me at (740) 380-5228 or erika.jackson@epa.state.oh.us.

Sincerely,

Erika Jackson
Environmental Specialist II
Division of Air Pollution Control

EJ/mlm

cc: Bruce Weinberg, SEDO, DAPC
Sarah Harter, SEDO, DAPC