



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490  
www.epa.state.oh.us

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

February 2, 2007

**RE: Perry County  
Shelly Materials Plant #65  
#0660000100: P001  
COMPLIANCE TEST**

**CERTIFIED: 70060100000356202631**

Mrs. Beth Mowrey  
Manager of Environmental Permitting and Compliance  
Shelly Materials, Inc.  
P.O. Box 266  
Thornville, Ohio 43821

Dear Mrs. Mowrey:

On September 19, 2006, Shelly Materials performed a particulate emission compliance test at Shelly Materials Plant #65 (Emissions Unit P001). Ohio EPA received the test report on October 13, 2006. The test report has been reviewed and we have concluded that the test was conducted according to the procedures specified in 40 CFR Part 60, Appendix A, U.S. EPA Test Methods 1-5. The results of the test showed the source to be in compliance with the applicable Ohio EPA regulations and your facility permit terms and conditions.

Our test review shows the following:

Particulate

- |    |                          |   |
|----|--------------------------|---|
| A. | Tested Emission Rate:    | 0.007 grains/dry standard cubic foot            |
| B. | Allowable Emission Rate: | 0.04 grains/dry standard cubic foot             |
| C. | Source Operating Rate:   | 150 tons per hour                               |
| D. | Isokinetic Rate:         | Run #1 - 97.4%; Run #2 -104.3 %; Run #3 -105.2% |

All test information will be used by Ohio EPA personnel for permit processing and source compliance review.

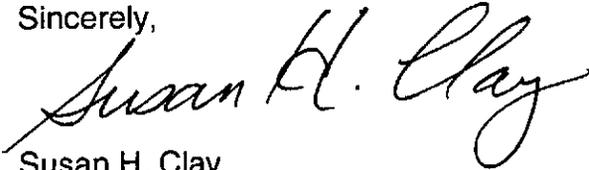
In the cover letter accompanying the test report, you provided a response to our September 18, 2006 written request for an explanation of the July 25, 2006 test failure and completed corrective actions. You indicated that, upon inspection of the bags by a representative of National Filter Media, Shelly Materials determined that the cause of the excess particulate emissions was that the wrong type of bag was being used in the baghouse. Ohio EPA requests that Shelly Materials provide documentation of the entire period of time during which the baghouse was utilizing the incorrect bag type. Please submit this information within 14 days of receipt of this letter to the attention of Sarah Harter.

Mrs. Beth Mowrey  
Shelly Materials. Inc.  
February 2, 2007  
Page 2

Please refer any questions concerning the above requirements to Sarah Harter, Ohio EPA  
Southeast District Office, at (740) 380-5249.

Thank you for your cooperation in this matter.

Sincerely,



Susan H. Clay  
Environmental Specialist  
Division of Air Pollution Control

SHC/mlm

cc: Sarah Harter(Emissions Unit File Copy)  
~~Dean Ponchak, DAPC-SEDO w/ CETA summary attachment~~  
Test Report File Copy

**DIVISION OF AIR POLLUTION CONTROL-SEDO**  
**CETA APPENDIX K DATA**  
**Stack Test Review Summary Form**

**FACILITY INFORMATION**

FACILITY NAME: SHELLY PLANT #65

COUNTY: MUSKINGUM

FACILITY ID:0660000100

SCC: 30500205

**EMISSION TEST INFORMATION**

POLLUTANT(S) TESTED: PM

INTENT TO TEST (ITT) NOTIFICATION SUBMITTED: 09/06/06

SCHEDULED TEST DATE FROM ITT: 09/19/06

TESTING FIRM: SHELLY MATERIALS

DATE TEST CONDUCTED: 09/19/06

**DAPC-SEDO TEST OVERSIGHT**

NAME OF DAPC-SEDO STAFF WITNESS: NONE

WERE ALL RUNS WITNESSED?            YES            X NO\*

    \*IF NO PROVIDE EXPLANATION:

IS STACK TEST FIELD FORM COMPLETE?            YES            X NO

WERE AUDIT SAMPLES TAKEN?            YES            X NO

**EMISSION UNIT INFORMATION**

EMISSION UNIT ID#: P001

EMISSION UNIT DESCRIPTION: 160 TPH DRUM MIX ASPHALT PLANT

**EMISSION UNIT MONITORING AND CONTROL**

LIST EU MONITORING EQUIPMENT: NONE

LIST EU CONTROL EQUIPMENT: BAGHOUSE

**TEST REPORT**

TEST REPORT REVIEWER: CLAY

DATE TEST REPORT RECEIVED AT SEDO: 10/13/06

POLLUTANT:PM TEST METHOD: 1-5  
ALLOWABLE EMISSION RATE (UNITS): 0.04 GR/DSCF  
AVERAGE TEST EMISSION RATE FOR THE THREE RUNS (UNITS): 0.007  
GR/DSCF  
MAXIMUM PERMITTED OPERATING RATE FOR EU: 160 TPH  
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 150 TPH

TEST PASSED X YES NO  
DATE TEST RESPONSE LETTER SENT TO FACILITY: ~~12/4/06~~ 1/30/07

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I HEREBY VERIFY THAT THE INFORMATION CONTAINED WITHIN THE STACK  
TEST REPORT HAS BEEN REVIEWED AND IT HAS BEEN DETERMINED THAT THE  
TEST PROCEDURES, ANALYSES, AND CALCULATIONS ARE:

- AN ACCEPTABLE DEMONSTRATION OF CONFORMANCE WITH THE APPROVED  
TESTING METHODOLOGY  
 AN UNACCEPTABLE DEMONSTRATION OF CONFORMANCE WITH THE  
APPROVED TESTING METHODOLOGY

12/1/06 (1/26/07) CLAY  
Date of Review Reviewed by