



State of Ohio Environmental Protection Agency

Southeast District Office

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

January 23, 2009

Re: Gallia County
Shelly Liquid Division
Facility ID # 0656000052
Non HPV Warning Letter

Certified: 70073020000178821497

Beth Mowrey
Shelly Liquid Division
PO Box 266
Thornville, OH 43076

Subject: Response to Shelly Liquid Division's December 19, 2008 letter

Dear Ms. Mowrey:

The liquid asphalt vapor pressure information provided in the December 19, 2008 letter does not adequately respond to Ohio EPA's request to provide vapor pressure data representative of the liquid asphalt concrete products used at the Gallipolis Facility. Ohio EPA is requesting the Shelly Liquid Division to submit the true vapor pressure of liquid asphalt concrete as used and stored at Shelly Liquid's Gallipolis Facility.

The 1994 submittal is a single sentence statement that the true vapor pressure is 1.9×10^{-10} . That statement, without providing the derivation of the calculations, is not sufficient to be accepted as is. The 2003 submittal cites 1.9×10^{-4} as the true vapor pressure of the liquid asphalt concrete products used at Shelly Liquid's Gallipolis Facility. Shelly Liquid cites AP-42 as the source for the true vapor pressure value 1.9×10^{-4} . It appears that the 1.9×10^{-4} value is strictly representative of Number 2 fuel oil stored at 100 degrees Fahrenheit. AP-42 does not indicate that the true vapor pressure for Number 2 fuel oil stored at 100 degrees Fahrenheit is interchangeable or representative of liquid asphalt concrete PG-64 and PG-70 stored at 300 degrees Fahrenheit. The 2003 submittal is not sufficient to be accepted as is.

If you have additional information that supports the 1994 and 2003 submittals, you may submit any new information to the Agency for our review.

It is my understanding through discussions during facility inspections, that Shelly Liquid Division adds different products to some of the tanks to change the properties of the liquid asphalt to satisfy customer needs. This is another reason that the Agency needs Shelly Liquid Division to submit the actual vapor pressure that is representative of the materials used at the Gallipolis Facility or a value with an acceptable basis of proof. We

Beth Mowrey
Shelly Liquid Division
January 23, 2009
Page 2

also rechecked the information we obtained for the Asphalt Technologies Facility. The information indicates that Asphalt Technologies may generate some customer-specific liquid asphalt blends, but they do use and store the same liquid asphalt concretes that your facility handles and that the affected facility operations are comparable.

In the December 19, 2008 letter, Shelly Liquid also asserts that the vapor recovery system has and continues to work properly. As indicated in our November 17, 2008 letter, the vapor recovery system was observed during a site visit and it was not working properly as vapors were being emitted during the loading process and they were not captured by the recovery system. In addition, Shelly Liquid recently made significant modifications to the vapor recovery system to improve the existing design. Ohio EPA has and continues to ask Shelly Liquid to submit information regarding the procedures used and parameters evaluated to ensure that the vapor recovery system is now operating properly as claimed by Shelly Liquid. During the December 3, 2008 inspection, I learned the vapor recovery system does not operate at 32 degrees Fahrenheit or below for technical purposes. This type of information, as well as the procedures used and parameters evaluated to ensure proper operation, is what we are trying to obtain. The vapor recovery system is one of the target odor sources at your facility and Ohio EPA is trying to complete a full evaluation of the facility operations due to on-going odor complaints.

In closing, Ohio EPA is again requesting the Shelly Liquid Division to submit (1) the true vapor pressure of the products used and stored at the Gallipolis Facility or submit more information to support the existing data submitted, and (2) the procedures used and parameters evaluated to ensure that the modified vapor recovery system is operating properly. Please submit the requested information within 30 days of receipt of this letter.

If you do not understand or 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, feel free to contact me at (740) 380-5255 or email marco.deshaies@epa.state.oh.us.

Sincerely,



Marco Deshaies
Division of Air Pollution Control
Southeast District Office

MD/mlm

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