



State of Ohio Environmental Protection Agency

**Southeast District Office**

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Logan, Ohio 43138

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

November 17, 2008

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

**Certified: 70063450000190557426**

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

Dear Ms. Mowrey:

The Agency's warning letter/information request was based upon observations made during the August 19, 2008 complaint investigation/inspection of the loading racks and a reevaluation of the loading rack's potential to emit calculations which were previously submitted to the Ohio EPA, Southeast District Office.

The inspection observations were documented as part of a complaint investigation, and the reevaluation of the loading rack calculations was prompted by (1) a review of a similar loading rack handling liquid asphalt concrete at another facility (Asphalt Technologies, PTI 01-12177) which uses 1.43 psia as the actual vapor pressure of the liquid asphalt concrete; and (2) the fact that there was little or no information provided about how the Shelly Company's true vapor pressure value for the liquid asphalt concrete was derived, in 1994 or 2003.

As such, the Agency is requesting the Shelly Company to provide documentation of the actual true vapor pressure of the liquid asphalt concrete, as stored and used at the Gallipolis facility. The documentation may come from the supplier of the liquid asphalt concrete provided that the documentation is reflective of the site specific conditions at the Gallipolis facility. The documentation may also be based upon test data from an independent laboratory using an appropriate analytical methodology.

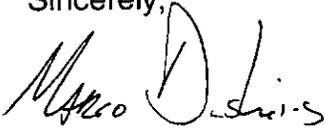
In regard to the vapor recovery system, the Ohio EPA, Southeast District Office respectfully disagrees with the Shelly Company's assertion that the system was operating properly on the day of our inspection. The fact that displaced vapors were observed bypassing the recovery system does not, in our opinion, indicate that the system was operating properly. Based upon our inspection observations, we believe a further evaluation of the recovery system is warranted.

Beth Mowrey  
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As discussed in the October 1, 2008 letter to the Shelly Liquid Division, Shelly Liquid Division shall submit information regarding the procedures used and parameters evaluated to ensure that the vapor recovery system is operating properly and the true vapor pressure of the liquid asphalt products as used/loaded at Shelly Liquid Division within 30 days to address the calculated emissions for both loading racks.

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, feel free to contact me at (740) 380-5255 or email [marco.deshaies@epa.state.oh.us](mailto: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