



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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www.epa.state.oh.us

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

October 1, 2008

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

Certified: 70063450000190559710

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

Dear Ms. Mowrey:

On August 19, 2008, I performed a facility inspection of Shelly Liquid Division, in Gallipolis, Ohio in response to an odor complaint. During the inspection, I met with Shelly Liquid Division representative, Rick Van Gundy, Terminal Manager. The inspection was conducted to determine the facility's compliance with State and federal air pollution rules and regulations. The following observation was made during the inspection.

I observed truck tankers being loaded with liquid asphalt concrete at Loading Rack #1. The organic vapors released during the loading process were observed and did not appear to be entering the vapor recovery system on the loading rack.

I have also reviewed the submitted loading rack emissions data/calculations dated 12/23/2008. A potentially significant discrepancy was observed in the calculations submitted. The discrepancy found was the use of the true vapor pressure of Residual Oil No. 6 at 100 degrees Fahrenheit (0.00019 psia). Predominantly, Shelly Liquid Division loads tanker trucks at the loading racks with liquid asphalt concrete (PG64-22 and PG70-22) at 300 degrees Fahrenheit. Ohio EPA believes there is a significant difference in the vapor pressure of these two products compared to Residual Oil No. 6, especially taking into account the actual temperature of the products. Ohio EPA believes the organic emissions may have been underestimated and could be in excess of 10 pounds per day and, as such, the loading racks may not be de minimis operations.

Due to the on-going odor complaints, the observation of organic vapors not being captured by the current vapor recovery system, and the vapor pressure discrepancy in the calculation of the potential organic emissions from the loading racks, Shelly Liquid Division shall submit information regarding the procedures used and parameters

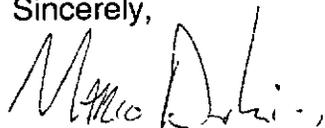
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evaluated to ensure that the vapor recovery system is operating properly and provide the true vapor pressure values for liquid asphalt products PG64-22 and PG 70-22 as stored/loaded at Shelly Liquid Division's Gallipolis facility. If the true vapor pressure values cannot be obtained from the manufacturer/supplier of the products, then Shelly Liquid Division shall submit a testing plan to accurately measure the 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. The testing plan, if necessary, shall include a completed intent to test notification, test date (test shall be no earlier than 30 days from the submission of the intent to test), the current operating and maintenance plan used to insure continuous effective organic vapor collection from the loading racks.

Shelly Liquid Division shall also submit the findings of the testing, if conducted, within 30 days of the test. The findings shall include more accurate emission potential calculations and any plan for modification to the vapor recovery system, if required, based on the test findings.

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.

Sincerely,



Marco Deshaies
Division of Air Pollution Control
Southeast District Office

MD/mlm

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