



## REGION 5

CHICAGO, IL 60604

### **MEMORANDUM**

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Shelly Company, Columbus, Ohio

**FROM:** Sasha Letuchy, Environmental Engineer  
AECAB (MI/WI)

**THRU:** Sarah Marshall, Section Supervisor  
AECAB (MI/WI)

**TO:** File

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### **BASIC INFORMATION**

**Facility Name:** Shelly Company

**Facility Location:** 395 Frank Road, Columbus, Ohio

**Date of Inspection:** 11/8/2023

**EPA Inspector(s):**

1. Sasha Letuchy, Environmental Engineer
2. David Sutlin, Environmental Engineer

**Other Attendees:**

1. Bernie Boggs, Foreman
2. Adeel Rind, Operations Manager
3. April Bott, VP Environmental for Shelly Company (on the phone for closing conference)

**Contact Email Address:** april.bott@shellyco.com, adeel.rind@shellyco.com

**Purpose of Inspection:** Asphalt plant inspection triggered by offsite observations of fugitive emissions

**Facility Type:** Asphalt plant

**Regulations Central to Inspection:** Ohio State Implementation Plan

**Arrival Time:** 4:00 pm

**Departure Time:** 5:15 pm

**Inspection Type:**

- ☒ Unannounced Inspection
- ☐ Announced Inspection

**OPENING CONFERENCE**

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet via email with this report
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Bernie Boggs, Adeel Rind, and April Bott unless otherwise noted.

**Process Description:**

The facility operates a hot mix asphalt (HMA) plant with a maximum production rate of 300 to 500 tons per hour. Aggregate is transported from cold aggregate bins via a conveyor to the double barrel drum mixer. Recycled asphalt or RAP is injected in the middle of the drum and liquid asphalt cement is injected towards the front of the drum. The process operates continuously, and the drum rotates to dry the aggregate and mix the materials. The mixture is discharged at the end of the drum and conveyed to HMA storage silos where it is loaded into transport trucks. Emissions from the end of the drum are routed to a baghouse.

**Staff Interview:** Bernie Boggs explained that he monitors the baghouse stack daily for visible emissions and records that information daily, along with the pressure drop across the baghouse. The EPA daily report was viewed on a computer monitor and confirmed that Bernie performs the daily inspections. The facility conducts annual inspections of the baghouse and maintains records of any maintenance conducted on the baghouse. Pressure drop was 3.4" water column (W.C.) on the day of the inspection and according to Bernie Boggs never dips below 2" W.C. The baghouse does not alarm when pressure drop is out of range.

The water truck is used approximately three to eight times a day, as needed, to control road dust. No watering is performed if the temperature is below freezing.

**TOUR INFORMATION**

**EPA Tour of the Facility:** No

**Data Collected and Observations:**

EPA arrived at the site around 3:40 pm, just before shutdown and watched the operations from the roadway. Prior to entry, road dust had been observed leaving the facility, crossing the water, and

entering Frank Rd. EPA followed the source of the road dust and saw that many emissions were being generated by truck traffic from the roads owned by Shelly Company and the roads owned by neighboring entities. Upon approaching Shelly Company, EPA noted additional emissions at the top of the HMA storage silos on the west side and the north side.

**Photos and/or Videos:** were taken during the inspection. See Appendix A.

**Field Measurements:** were not taken during this inspection.

#### **RECORDS REVIEW**

EPA reviewed the November 7, 2023 EPA daily report which stated that the pressure drop was 3.2" W.C. and showed that a daily inspection of the baghouse had been conducted.

#### **CLOSING CONFERENCE**

☒ Provided U.S. EPA point of contact to the facility

**Concerns:** EPA identified visible emission from the roadways and at the top of the asphalt silos.

#### **DIGITAL SIGNATURES**

Report Author: **ALEXANDR  
A LETUCHY** Digitally signed by  
ALEXANDRA LETUCHY  
Date: 2023.12.19  
13:48:20 -06'00'

Section Supervisor: **SARAH  
MARSHALL** Digitally signed by  
SARAH MARSHALL  
Date: 2023.12.19  
15:24:25 -06'00'

**Facility Name:** Shelly Company  
**Facility Location:** 395 Frank Road, Columbus, Ohio  
**Date of Inspection:** November 8, 2023

**APPENDICES AND ATTACHMENTS**

1. Digital Image Log

**Facility Name:** Shelly Company  
**Facility Location:** 395 Frank Road, Columbus, Ohio  
**Date of Inspection:** November 8, 2023

**APPENDIX A: DIGITAL IMAGE LOG**

|                                        |                                                                       |
|----------------------------------------|-----------------------------------------------------------------------|
| <b>1. Inspector Name:</b> David Sutlin | <b>2. Archival Record Location:</b> <i>Electronics Records Center</i> |
|----------------------------------------|-----------------------------------------------------------------------|

| <b>Image Number</b> | <b>File Name</b> | <b>Date and Time (incl. Time zone and DST)</b> | <b>Latitude and Longitude</b> | <b>Description of Image</b>                                 |
|---------------------|------------------|------------------------------------------------|-------------------------------|-------------------------------------------------------------|
| 1                   | PB080332.JPG     | 11/8/23 3:51pm                                 | NA                            | Emissions from parking lot near Frank Rd.                   |
| 2                   | PB080333.JPG     | 11/8/23 3:51pm                                 | NA                            | Haziness near facility                                      |
| 3                   | PB080334.JPG     | 11/8/23 3:51pm                                 | NA                            | Haziness over facility                                      |
| 4                   | PB080335.MOV     | 11/8/23 3:52pm                                 | NA                            | Video of dust generated from trucks and haziness            |
| 5                   | MAH00033.MPH/THM | 11/8/23 4:09pm                                 | NA                            | Video of HMA tanks                                          |
| 6                   | MAH00034.MPH/THM | 11/8/23 4:11pm                                 | NA                            | Video of intermittent emissions at the top of the HMA tanks |
| 7                   | MAH00035.MPH/THM | 11/8/23 4:15pm                                 | NA                            | Video of emissions at the top of the HMA tanks              |