Facility ID: 1409090641 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Gasoline Storage Tanks - 1-10,000 Gallon and 1-8,000 Gallon Underground Storage Tanks	OAC rule 3745-21-09(R)	Stage I vapor control - 90% control efficiency for VOCs, submerged fill
Gasoline Dispensing Operation - Ten (10) dispensing nozzles, Stage II vapor recovery	OAC rule 3745-21-09(DDD)	Stage II vapor control - 95% control efficiency for VOCs
Gasoline Dispensing Facility	OAC rule 3745-31-05	1.0 TPY OC

2. **Additional Terms and Conditions**

   (a) Pursuant to OAC rule 3745-21-09 (DDD)(1)(b), the Stage II vapor control system shall be installed, operated, and maintained in accordance with the applicable certification granted by the California Air Resources Board (CARB) as described in Part II, Section F below.

   Any figures or exhibits identified in this permit are available from the appropriate Ohio EPA District Office or local air agency upon request.

B. **Operational Restrictions**

1. The permittee shall comply with the following operational restrictions for the Stage I vapor control system:

   a. The vapor balance system shall be kept in good working order and shall be used at all times during the transfer of gasoline.

   b. There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.

   c. There shall be no leaks in the vapor lines or liquid lines during the transfer of gasoline.

   d. The transfer of gasoline from a delivery vessel to a stationary storage tank shall be conducted by use of submerged fill into the storage tank. The submerged fill pipe(s) are to be installed so they are within six (6) inches of the bottom of the storage tank.

   e. All fill caps shall be "in place" and clamped during normal storage conditions.

   f. The permittee shall repair within 15 days any leak from the vapor balance system or vapor control system which is employed to meet the requirements of paragraph (R)(1) of OAC rule 3745-21-09 when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.

2. The permittee shall comply with the following operational restrictions for the Stage II vapor control system:

   a. The vapor control system shall be installed, operated and maintained in accordance with the manufacturer's specifications and the applicable certification granted by the CARB, and shall be free of the following defects:

      i. Any component, that is required to be employed at all times pursuant to the system certification granted by the CARB, is absent or disconnected.

      ii. A vapor hose is crimped or flattened such that the vapor passage is blocked, or the pressure drop through the vapor hose exceeds by a factor of two or more the requirements in the certification granted by the CARB.

iii. A vacuum producing device is inoperative or malfunctioning.

iv. Pressure/vacuum relief valves, vapor check valves, or dry breaks are inoperative.

v. Any vapor recovery equipment is leaking liquid gasoline or gasoline vapors.

vi. Any other equipment defect identified in the CARB certification as one which substantially impairs the effectiveness of the vapor control system.

b. The vapor control system must have successfully passed the testing requirements contained in paragraph (DDD)(2) of OAC rule 3745-21-09. These testing requirements are also specified in Part II, Section E and Part II, Section F.6.

c. Operating instructions for the vapor control system shall be conspicuously posted in each gasoline dispensing area. The operating instructions shall clearly describe how to properly fuel motor vehicles and shall specifically prohibit the topping off of the motor vehicle fuel tank.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records of the results of any leak checks, including, at a minimum, the following information:

a. Date of inspection.

b. Findings (may indicate no leaks discovered or location, nature, and severity of each leak).

c. Leak determination method.

d. Corrective action (date each leak repaired and reasons for any repair interval in excess of 15 calendar days).

e. Inspector's name and signature.

2. The permittee shall maintain records of the following information:

a. The quantity of gasoline delivered to the facility during each calendar month.

b. The results of any tests performed pursuant to the testing requirements specified in this permit.

c. A log of the date and description of all repair and maintenance work performed (including, but not limited to, work performed to meet manufacturer's specifications or CARB certification requirements), or any other modifications made to the vapor control system.

d. A copy of the most recent permit to operate application (including appendix) submitted to the Ohio EPA.

e. A copy of the most recent permit to operate issued by the Ohio EPA.

f. Proof of attendance and completion of the training required by the Ohio EPA for the operator or local manager of the gasoline dispensing facility.

g. Copies of all completed post test inspection forms.

3. The permittee shall maintain records of the annual gasoline throughput for the facility.

D. **Reporting Requirements**

1. Any leak from the vapor balance system or vapor control system that is not repaired within 15 days after identification shall be reported to the Director within 30 days after the repair is completed.

2. A comprehensive written report on the results of any tests performed in accordance with the requirements of this permit shall be submitted within 30 days following the completion of the tests.

E. **Testing Requirements**

1. The Stage II vapor control system must successfully meet all requirements regarding testing contained in OAC rule 3745-21-09(DDD)(2). In accordance with the test procedures listed in OAC rule 3745-21-10, the following tests shall be performed: static leak test and dynamic pressure performance test.

At intervals not to exceed five (5) years, the permittee shall repeat and demonstrate compliance with the static leak test requirements contained in OAC rule 3745-21-10, Appendix A (unless a greater frequency is specified in the applicable CARB certification), and the dynamic pressure performance test requirements contained in OAC rule 3745-21-10, Appendix B (unless the dynamic pressure performance test is not applicable to the specific Stage II vapor control system, as specified in the applicable CARB certification).

Not later than thirty (30) days prior to any required tests, the permittee shall submit a test notification to the appropriate Ohio EPA District Office or local air agency.

The test notification shall describe the proposed test methods and procedures, the time and the date of the tests, and the person who will be conducting the tests. Failure to submit such notification prior to the tests may result in the Ohio EPA's refusal to accept the results of the tests. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information during the tests. After completion of any tests, the permittee shall complete and retain on site a copy of the post test inspection form contained in OAC rule 3745-21-10, Appendix C.

2. Compliance with the annual organic compound (OC) emission limit in Section A.1. of these terms and conditions shall be calculated as the sum of the OC emissions from all gasoline storage tank filling and dispensing operations and, if applicable, diesel, kerosene, and used oil tank filling operations at the gasoline dispensing facility (unless otherwise exempted pursuant to OAC rule 3745-31-03). This calculation shall be based on the annual gasoline, diesel, kerosene, and used oil throughputs for the facility using the calculation and emission

factors below.

a. Emission Limitation: 1.0 tons OC/year.

b. Applicable Compliance Method: multiply the appropriate emission factor below by the gallons of gasoline, diesel, kerosene, or used oil dispensed per year and divide by 2000 lbs/ton. Repeat this calculation for each material dispensed at the facility and sum the results to yield the total annual OC emission rate.

(Emission rates (factors) are expressed in pounds (lbs) of organic compounds per 1000 gallons of gasoline throughput. Emission factors are for VOC as well as total organic compound (OC) emissions, because the methane and ethane content of gasoline is negligible.)

i. Emission factors for gasoline storage tank filling and dispensing operations:

(a) Gasoline dispensing facility has submerged tank filling for gasoline storage tanks: OC emission factor = 20.0 lbs OC/1000 gallons.

(b) Gasoline dispensing facility has submerged tank filling with Stage I vapor control for gasoline storage tanks: OC emission factor = 13.0 lbs OC/1000 gallons.

(c) Gasoline dispensing facility has submerged tank filling with Stage I vapor control for gasoline storage tanks and Stage II vapor control for vehicle refueling: OC emission factor = 3.1 lbs OC/1000 gallons.

(Gasoline emission factors are from USEPA publication AP-42, Fifth Edition, Table 5.2-7)

ii. Emission factors for diesel, kerosene, and used oil tank filling operations:

(a) Gasoline dispensing facility has submerged tank filling for diesel, kerosene, and used oil tank filling operations: OC emission factor = 0.027 lb OC/1000 gallons.

(This emission factor is the SCC emission factor for transfer operations from diesel storage tanks. It is assumed that the same emission factor applies to kerosene and used oil transfer operations.)

F. **Miscellaneous Requirements**

1. The OPW VaporEZ Stage II vapor recovery system employed at this facility, including all associated underground and aboveground plumbing, shall be installed, operated, and maintained in accordance with CARB Executive Order G-70-163, which includes, but is not limited to, the requirements contained within this Section.

2. The permittee shall comply with the following design and installation specifications from CARB Executive Order G-70-163:

a. The equipment approved for use with the OPW VaporEZ system is specified in Exhibit 1 of Executive Order G-70-163. Other equipment may not be used unless approved by CARB for use with the OPW VaporEZ system.

b. The maximum length of the coaxial hose shall be fifteen (15) feet, and the maximum allowable length of hose which may be in contact with the top of the island block, or ground, shall be six (6) inches.

c. Each vent pipe shall be equipped with a CARB certified pressure/vacuum relief valve. Plumbing may be manifolded to reduce the number of relief valves needed. The vent manifold may be used as an alternative to an underground manifold only in existing installations where vapor piping is already installed.

d. The settings of the pressure/vacuum relief valve(s) shall be as follows:

i. Pressure: Three (3.0) +/- one-half (0.5) inches of water column

ii. Vacuum: Eight (8.0) +/- two (2.0) inches of water column

e. Coaxial Stage I vapor recovery systems shall not be used with new installations of the OPW VaporEZ system. Coaxial Stage I systems may be used with existing installations if:

i. The existing coaxial Stage I system is a poppeted, CARB certified system.

ii. The installation of the Stage II system requires no modification of the underground storage tank(s) (UST(s)) and/or connections.

iii. The existing coaxial Stage I equipment is in good working order and has demonstrated compliance with Static Leak Test criteria when tested with all fill caps removed.

3. The permittee shall comply with the following operational restrictions from CARB Executive Order G-70-163:

a. The OPW VaporEZ system shall be maintained in accordance with the System Operating Manual approved by CARB. Any alteration of the equipment, parts, design, or operation of the system is prohibited unless approved by CARB.

b. The maximum dispensing rate shall not exceed ten (10.0) gallons per minute (gpm). Compliance with this condition shall be verified with only one nozzle in operation per product supply pump.

c. One (1) Blackmer model VRFO pump shall be installed for each dispensing nozzle. The pump shall be serviced only by a qualified contractor, and field service of the pump is prohibited.

d. Hose breakaways are optional for the OPW VaporEZ system, but, if installed, only CARB certified breakaways which close the vapor path shall be used.

e. An efficiency compliance device (ECD) shall be installed on each nozzle as shown in Executive Order G-70-163. Any nozzle with an ECD which is missing, or which is damaged such that at least one-eighth (1/8) of the

diameter is missing, or which has a cumulative damage equivalent to at least 1/8 of the diameter, is defective and shall be immediately removed from service.

f. Vapor collection holes in the nozzle spout shall remain unblocked. Any nozzle with blocked vapor collection holes is defective and shall be immediately removed from service.

4. The permittee shall comply with the following performance specification from CARB Executive Order G-70-163:

   The air-to-liquid ratio (A/L) shall be between 0.90 and 1.10 when tested in accordance with an A/L test procedure adopted by the Ohio EPA.

5. The permittee shall comply with the following monitoring requirement from CARB Executive Order G-70-163:

   The permittee shall monitor the Stage II vapor recovery system performance and all aspects of operation to the extent necessary to ensure compliance with the conditions and specifications contained within this Section.

6. The permittee shall comply with the following testing requirement from CARB Executive Order G-70-163:

   In accordance with the yearly static pressure decay testing requirement specified in CARB Executive Order G-70-163, the Static Leak Test contained in OAC rule 3745-21-10, Appendix A, shall be successfully conducted at least once in each twelve- consecutive-month period after the date of successful completion of the startup or most recent Static Leak Test. The appropriate Ohio EPA District Office or local air agency shall be notified at least 30 days prior to conducting these annual tests. Test results shall be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days of testing.

7. The permittee shall comply with the following record keeping requirement from CARB Executive Order G-70-163:

   A log of the date and description of all repair and maintenance work performed on the OPW VaporEZ system shall be maintained on site or otherwise provided to Ohio EPA field office personnel immediately upon request.