Facility ID: 1677150023 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 - one (1) - 10,000 gallon, one (1) - 8,000 gallon, and two (2) - 6,000 gallon underground storage tanks.	OAC rule 3745-21-09 (R) See Section F.10.	Stage I vapor control - 90% control efficiency for VOC, submerged fill.
Gasoline Dispensing Operation - twenty-four (24) nozzles, Stage II vapor recovery.	OAC rule 3745-21-09 (DDD) See Section F.10.	Stage II vapor control - 95% control efficiency for VOC.
Gasoline Storage Tanks and Dispensing.	OAC rule 3745-31-05 See Section F.10.	Stage I & II controls as above.

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 Ohio EPA field office upon request.

B. **Operational Restrictions**

1. Stage I Operational Restrictions

   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 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. Stage II Operational Restrictions

   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 California Air Resources

Board, 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 California Air Resources Board, 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 California Air Resources Board.

(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 California Air Resources Board 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. Stage I record keeping requirements

The permittee shall maintain records of the following information:

(a) The results of any leak checks, including, at a minimum, the following information:

(i) Date of inspection.

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

(iii) Leak determination method.

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

(v) Inspector's name and signature.

2. Stage II record keeping requirements

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.

D. **Reporting Requirements**

1. Stage I reporting requirements

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. Stage II reporting requirements

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. Stage II testing requirements

The vapor control system must successfully meet all requirements regarding testing contained in OAC rule 3745-21-09(DDD)(2).

(a) At intervals not to exceed one (1) year, the permittee shall conduct, and pass the static leak test contained in OAC rule 3745-21-10, Appendix A as described in Section F.6 below.

Not later than thirty (30) days prior to any required tests, the permittee shall submit a test notification to the Ohio EPA field office.

The test notification shall describe the proposed test methods and procedures, the time and the date of the test, and the person who will be conducting the test. Failure to submit such notification prior to the test may result in the Ohio EPA's refusal to accept the results of the test. Personnel from the Ohio EPA or its delegated local air agency shall be permitted to witness the test, examine the testing equipment, and acquire data and information during the test. 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.

F. **Miscellaneous Requirements**

1. Applicable requirements under California Air Resources Board (CARB) Executive Order G-70-7-AD for Hasstech VCP-2/2A Stage II vapor recovery system installed at this facility

   The Hasstech VCP-2/2A Stage II vapor recovery system, including all associated underground and aboveground plumbing, shall be installed, operated, and maintained in accordance with CARB Executive Order G-70-7-AD, which includes, but is not limited to the requirements contained within this Section.

2. Design and installation specifications

   The equipment approved for use with the Hasstech VCP-2/2A system is specified in Exhibit 1 of Executive Order G-70-7-AD. Other equipment may not be used unless approved by CARB for use with the Hasstech VCP-2/2A system. NOTE: The Hasstech VCP-2/2A system may be differentiated from the Hasstech VCP-3/3A system by the following: (1) Hasstech status panel serial number VR-00847 and lower; (2) processor serial number PR-00907 and lower.

   The maximum length of the coaxial hose shall be fourteen (14) 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.

   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 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

   The horizontal distance between the pressure/vacuum relief valve(s) and the processing unit shall not be less than twenty (20) feet.

   COLLECTION UNIT AND PROCESSOR:
   The audio alarm portion of the Hasstech VCP-2/2A system shall be located such that it can be heard by station personnel in the area most likely to be occupied during normal station operation (i.e., at the cash register).

   The permittee shall provide OSHA-approvable access upon request to the collection unit and the processing unit for inspection and/or testing.

3. Operational Restrictions

   The Hasstech VCP-2/2A 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.

   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.

   Vapor collection holes in the nozzle spout shall remain unblocked. Any nozzle/hose assembly with a defective CFC-1 flow control vapor valve and all nozzle/hose assemblies associated with a CFC-1 flow control vapor valve stuck in the "open" position shall be immediately removed from service.

   COLLECTION UNIT AND PROCESSOR:
   The Hasstech VCP-2/2A system shall sound an audible alarm if the processing unit has made twenty (20) consecutive unsuccessful attempts to ignite and has shut down. The RESET button may be used to re-start the processing unit. Any observation of three (3) consecutive unsuccessful attempts of the processing unit to ignite shall be deemed a failure of the processing unit unless it occurs within two (2) hours of normal vehicle refueling operations after a bulk delivery.

   The optimum daily PR/CU ratio is 1.0. The PR/CU ratio shall be maintained as close to 1.0 as possible, but in no event less than 0.75 for the PR/CU ratio.

4. Performance Specifications

   The air-to-liquid ratio (A/L) shall be within the ranges specified below when tested in accordance with an A/L test procedure adopted by the Ohio EPA.

Flow Rate (gpm)	Minimum Ratio	Maximum Ratio
6	1.40	2.40
8	1.40	2.30
10	1.40	2.15

   PROCESSOR:
   The Hasstech VCP-2/2A system shall be maintained such that the ratio of processor time (PR) divided by collection unit time (CU), as recorded by the Hasstech status panel (PR/CU), is not less than 0.75 for any 24

consecutive hour period.

5. Maintenance Requirements

Maintenance shall be scheduled immediately in the event that the ratio of processor time (PR) divided by collection unit time (CU) is less than 0.75 for any 24 consecutive hour period.

ANNUAL AND SEMI-ANNUAL MAINTENANCE:
The permittee shall conduct the following maintenance on an annual basis. These items shall be repaired or replaced as necessary:

(i) Clean all screens in the vapor return system;

(ii) Check the ionization detector and replace any defective electrodes;

(iii) Check the CFC-1 flow control valve(s) to determine whether they are opening and closing properly or whether they are leaking gasoline liquid or vapor;

(iv) Check the collection unit for proper operation according to manufacturer's instructions and verify operation of the collection unit by authorizing a dispenser and observing collection unit motor run; and

(v) Check the process unit for proper operation by observing heat waves from the process unit stack when the storage tank pressure is greater than two inches water column.

The permittee shall conduct items (i), (ii), and (iii) above every six (6) months if the facility dispenses more than 75,000 gallons of gasoline per month in any given month.

COLLECTION UNIT (BLOWER) MAINTENANCE:

If the facility dispenses an average of more than 20,000 gallons of gasoline per month, the permittee shall replace or rebuild the collection unit (blower) motor after five (5) years or less after installation, or when repairs are necessary to maintain adequate performance of the collection unit (i.e., adequate vapor collection efficiency at the dispensing nozzle(s)) or after ten (10) years or less after installation, or when repairs are necessary to maintain adequate performance of the collection unit if the facility dispenses an average of less than 20,000 gallons of gasoline per month.

6. Testing

In accordance with the annual static pressure decay testing requirement specified in CARB Executive Order G-70-7-AD, 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 Ohio EPA field office shall be notified at least 30 days prior to conducting these annual tests. Test results shall be submitted to the Ohio EPA field office within 30 days of testing.

7. Monitoring

The Hasstech VCP-2/2A system shall be equipped with an operable Hasstech status panel. The Hasstech status panel shall record and store for at least a rolling total of 365 consecutive days the following information:

(i) Total minutes per day that the processing unit (PR) senses the presence of a flame; and

(ii) Total minutes per day that the collection unit (CU) is on.

8. Record keeping

A log of the date and description of all repair and maintenance work performed on the Hasstech VCP-2/2A system shall be maintained on site or otherwise provided to Ohio EPA field office personnel upon request.

PROCESSOR:
The processor time (PR), the collection unit time (CU), and the PR/CU ratio shall be recorded each day using the attached form and instructions.

NOTE: It will be necessary to make a copy of this, or a similar data log for each month of the calendar year. This log shall contain, at a minimum, the specified information for at least a rolling total of 365 consecutive days and shall be MAINTAINED ON SITE.

9. Reporting

IF DAILY PR/CU IS BELOW 0.75:

If the PR/CU ratio is less than 0.75 for three (3) consecutive days, the owner/operator shall provide a written notification of the malfunction and other data required by Ohio Administrative Code (OAC) rule 3745-15-06(B)(1) to the Ohio EPA field office. The notification shall include a copy of such record and shall be sent to the Ohio EPA field office within 14 days after the malfunction occurs. The Ohio EPA field office shall be notified pursuant to OAC rule 3745-15-06(B)(2) when the condition causing the failure or breakdown has been corrected.

IF GASOLINE IS DISPENSED WHILE THE HASSTECH SYSTEM IS TURNED OFF OR DISABLED:

If gasoline dispensing occurs for more than seventy-two (72) hours while the Hasstech system is turned off or disabled for maintenance or for any other reason, the owner/operator shall provide a written notification to the Ohio EPA field office. The notification shall include a copy of such record and shall be sent to the Ohio EPA field office within 14 days after the occurrence. The Ohio EPA field office shall be notified pursuant to OAC rule 3745-15-06(B)(2) when the condition causing the failure or breakdown has been corrected.

If gasoline dispensing occurs for more than seventy-two (72) hours while the Hasstech system is turned off or disabled for maintenance or for any other reason, the owner/operator shall prepare and submit to the Ohio EPA

field office a preventive maintenance and malfunction abatement plan pursuant to OAC rule 3745-15-06(B)(3) as appropriate.

10. The terms and conditions listed this permit shall supersede the air pollution control requirements contained in the permit to install 16-846 issued for this emissions unit on February 7, 1970.