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Application Number: **13-3508**

Date: **February 3, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Ruda's Marathon** located in **Cuyahoga** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source No.

Source Description

G001

Gasoline dispensing facility with Stage I and Stage II (vacuum assist)

EMISSION SUMMARY

The total, allowable volatile organic compound emissions from the source(s) will be 1.30 tons per year.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

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 specified in narrative form following the table.

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<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
gasoline storage tank(s): (1) one 6,000 and (2) two 8,000-gallon underground storage tank(s)	OAC rule 3745-21-09 (R)	Stage I vapor control - 90 percent control efficiency for volatile organic compounds (VOCs), submerged fill
gasoline dispensing operation: (4) four nozzles, Stage II vapor recovery	OAC rule 3745-31-05 OAC rule 3745-21-09 (DDD)	Compliance with OAC rule Stage II vapor control - 95 percent control efficiency for VOCs
	OAC rule 3745-31-05	Compliance with OAC rule

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

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

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- 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; and,
 - 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

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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; and,
 - 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.; and,
 - 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 Recordkeeping 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); and,
 - e. inspector's name and signature.

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2. The permittee shall maintain records of the following information:
 - a. the quantity of gasoline delivered to the facility during each calendar month;

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- 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; and,
- g. copies of all completed post test inspection forms.

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.

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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.

F. Miscellaneous Requirements

1. The Dresser/Wayne WayneVac 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-70-153-AA, 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-70-153-AA:
 - a. the equipment approved for use with the

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Dresser/Wayne WayneVac system is specified in Exhibit 1 of Executive Order G-70-153-AA. Other equipment may not be used unless approved by CARB for use with the Dresser/Wayne WayneVac 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;

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- 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; and,
 - ii. Vacuum: Eight (8.0) +/- two (2.0) inches of water column
 - e. a threaded tap at least 1/8 inch NPT shall be installed in one vent pipe, at least six (6) feet above grade and not exceeding eight (8) feet above grade. This tap shall remain plugged and vapor tight except when test equipment is being connected or removed;
 - f. coaxial Stage I vapor recovery systems shall not be used with new installations of the Dresser/Wayne WayneVac 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; and,
 - 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-

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153-AA:

- a. the Dresser/Wayne WayneVac 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. no dispensing shall be allowed when the vapor collection pump is disabled for maintenance or for any reason. Only those nozzles affected by the disabled vapor pump are subject to this condition;
- d. the following conditions shall shut down the entire dispenser:
 - i. failure or loss of the Dresser/Wayne WayneVac system power supply; and,
 - ii. vapor pump motor failure indicated when more than 1/2 power is applied for over 10 seconds with no rotation detected.
- e. a vapor escape guard (VEG) shall be installed on each nozzle as shown in Figures 2C-1 or 2C-2 of Executive Order G-70-153-AA. Any nozzle with a VEG 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 fewer than two (2) unblocked vapor collection holes is defective and shall be immediately removed from service; and,
- g. each nozzle shall be equipped with an integral

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vapor valve. Any nozzle with a defective vapor valve, and all nozzles at the same fueling point (dispenser side), shall be immediately removed from service and the vapor path closed as soon as possible.

4. The permittee shall comply with the following performance specification from CARB Executive Order G-70-153-AA:

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-70-153-AA:

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-70-153-AA:

In accordance with the yearly static pressure decay testing requirement specified in CARB Executive Order G-70-153-AA, 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-70-153-AA:

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