Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

6/21/2011

Farid Mohammad
HUGHES SUNOCO
11005 SAINT CLAIR AVE
CLEVELAND, OH 44108

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318007691
Permit Number: P0094791
Permit Type: Renewal
County: Cuyahoga

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page,www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: CDAQ

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
HUGHES SUNOCO

Facility ID:	1318007691
Permit Number:	P0094791
Permit Type:	Renewal
Issued:	6/21/2011
Effective:	6/21/2011
Expiration:	6/21/2021

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
HUGHES SUNOCO

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Authorization

Facility ID: 1318007691
Application Number(s): A0026312
Permit Number: P0094791
Permit Description: PTIO Renewal permit for a gasoline dispensing facility with two 10,000 gallon tanks and less than 100,000 gallons/month flowthrough and Dresser/Wayne Stage II controls. (PTO P0056945 dated 2/17/1995)
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 6/21/2011
Effective Date: 6/21/2011
Expiration Date: 6/21/2021
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

HUGHES SUNOCO
11005 SAINT CLAIR AVE
Cleveland, OH 44108

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0094791
Permit Description: PTIO Renewal permit for a gasoline dispensing facility with two 10,000 gallon tanks and less than 100,000 gallons/month flowthrough and Dresser/Wayne Stage II controls. (PTO P0056945 dated 2/17/1995)

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**G001**
Company Equipment ID:	Gasoline Dispensing
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement.Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is takenby Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Cleveland Division of Air Quality in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

[1]Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. 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).

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

      (1) None.

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

      (1) The Ohio EPA has determined that this facility may be subject to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

C. Emissions Unit Terms and Conditions

1. G001, Gasoline Dispensing

Operations, Property and/or Equipment Description:

GDF facility with two 10,000 gallon tanks and Stage II Dresser/Wayne controls

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	3.29 TPY volatile organic compounds (VOC). The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(R) and 3745-21-09(DDD).
b.	OAC rule 3745-21-09(R)	Stage I vapor control - 90% control efficiency for VOCs, and submerged fill tanks.
c.	OAC rule 3745-21-09(DDD)	Stage II vapor control - 95% control efficiency for VOCs.

(2) Additional Terms and Conditions

a. The permittee shall not cause, allow, or permit the transfer of gasoline at the gasoline dispensing facility, unless the following requirements are met:

i. each stationary gasoline storage tank shall be equipped and filled with a submerged fill pipe; and

ii. for any transfer of gasoline from a delivery vessel to a stationary storage tank located at the facility, the vapors displaced from the stationary storage tank shall be processed by one of the following systems:

(a) a vapor balance system which is designed and operated to route at least 90 percent, by weight, of the VOC in the displaced vapors to the delivery vessel and which is equipped with a means to prevent the discharge of displaced vapors from an unconnected vapor line; or

(b) a vapor control system which is designed and operated to recover at least 90 percent by weight of the VOC in the displaced vapor

b. The permittee shall operate and maintain a Stage II vapor control system for the gasoline dispensing facility pursuant to the requirements of OAC rule 3745-21-09 (DDD) and shall have it certified in accordance with the requirements of the California Air Resources Board (CARB). The permittee shall not cause, allow, or permit the transfer of gasoline from a stationary storage tank into a motor vehicle unless all vapors displaced from the motor vehicle are vented to the vapor control system, which shall be designed and operated to maintain an overall control efficiency of not less than 95 percent, by weight, for the VOC in the displaced vapors**.** The vapor control system shall employ only coaxial hoses and the use of remote check valves shall be prohibited. The Stage II control requirements shall be maintained as required by this permit even if the monthly gasoline throughput subsequently falls below 10,000 gallons per month.

c) 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; 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 operated, and maintained in accordance with the manufacturer's specifications and the applicable CARB certification and shall be free of the following defects:

i. any component that is required to be employed at all times pursuant to the CARB system certification 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 the requirements in the CARB certification by a factor of two or more;

iii. a nozzle boot is torn in one or more of the following manners:

(a) a triangular-shaped or similar tear one-half inch or more to a side, or a hole one-half inch or more in length; and/or

(b) a slit one inch or more in length.

iv. a faceplate or flexible cone is damaged in the following manner:

(a) for balance nozzles and for nozzles for aspirator and educator-assist type systems, the capability to achieve a tight seal with a fill pipe interface is deficient for one-fourth of the circumference of the faceplate (accumulated); and

(b) for nozzles for vacuum assist-type systems, more than one fourth of the flexible cone is missing.

v. nozzle shutoff mechanisms are malfunctioning in any manner;

vi. vapor return lines, including such components as swivels, anti-recirculation valves, and underground piping are malfunctioning or are blocked or restricted, such that the pressure drop through the lines exceeds, by a factor of two or more, the requirements specified in the CARB certification.

vii. a vapor processing unit is inoperative or malfunctioning;

viii. a vacuum producing device is inoperative or malfunctioning;

ix. pressure/vacuum relief valves, vapor check valves, or dry breaks are inoperative;

x. any vapor recovery equipment is leaking liquid gasoline or gasoline vapors; and

xi. 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 successfully pass the testing requirements contained in paragraph (DDD)(2) of OAC rule 3745-21-09. These testing requirements are also specified in f) and g)(6) below; 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.

d) 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.

(2) The permittee shall maintain the following records:

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

b. the annual gasoline throughput for the facility;

c. the results of any tests performed pursuant to the testing requirements specified in this permit;

d. 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 record of other modifications made to the vapor control system;

e. a copy of the most recent permit to operate application (including the appendix of Emission Activity Category Forms) submitted to the Ohio EPA;

f. a copy of the most recent permit to operate issued by the Ohio EPA, following its issuance;

g. 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

h. copies of all completed post test inspection forms.

All records shall be retained by the permittee for a period of not less than three years and shall be made available to the Director, or any authorized representative of the Director, for review during normal business hours.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the annual PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(2) Any leak(s) in the vapor balance system or vapor control system 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 of the Administrative Code, that is/are not repaired within 15 days after identification, shall be identified in the annual PER and shall include the date the leak was detected, the highest gas analyzer reading, and the date the leak was repaired.

(3) The permittee shall include in the annual PER any deviations from the leak rate criteria and requirements specified in the static leak test as specified in Appendix A to OAC rule 3745-21-10 and/or any deviation from the maximum back pressure as determined from the required dynamic pressure performance testing completed as specified in Appendix B to OAC 3745-21-10.

(4) 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. The test report forms contained in the Appendices to OAC rule 3745-21-10 should be submitted and contain the information necessary to determine or demonstrate compliance.

(5) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Cleveland DAQ.

f) Testing Requirements

(1) The permittee shall demonstrate compliance for the vapor control system(s) by completing the following testing requirements:

a. Within 60 days after the installation or modification of a vapor control system required pursuant to paragraph (DDD)(1) of that rule, and at intervals not to exceed 5 years thereafter, the permittee shall perform and comply with the requirements of the following tests:

i. A leak test shall be performed in accordance with the test procedures contained in paragraph (Q) of OAC rule 3745-21-10 and as specified in Appendix A of this rule, to quantify the vapor tightness of the vapor control system. The vapor control system must comply with the leak rate criteria specified in the test procedures and Form 1 from Appendix A shall be completed and submitted to document the test results.

ii. Dynamic pressure performance tests shall be performed in accordance with the test procedures contained in paragraph (R) of OAC rule 3745-21-10 and as specified in Appendix B of this rule, to determine the pressure drop through the Stage II vapor control system at prescribed flow rates. The applicability of each Alternate Method is dependent upon the regulatory requirements imposed by the CARB Executive Order for the Stage II (or Phase II) vapor recovery system installed. The vapor recovery system must comply with the dynamic back pressures shown in the following table:

Nitrogen flowrate (scf/hour)	Maximum dynamic back pressure (inches of water)
40	0.16
60	0.35
80	0.62

The appropriate test result forms for the dynamic pressure performance testing from Appendix B to OAC 3745-21-10 shall be completed and submitted to document the test results, along with theStage II Post Test Inspection Form in Appendix C of the same rule.

b. For purposes of determining test performance requirements for modifications to the vapor control system, a significant modification of a vapor control system that would require retesting shall include the following:

i. any change, such as the removal of certified components and the addition or removal of piping or fittings, which may cause the vapor control system to be incapable of maintaining an overall control efficiency of not less than 95 percent, by weight, for the VOC emissions; and

ii. any change which requires a permit-to-install pursuant to OAC rule 3745-31-02.

c. Not later than 30 days prior to any tests required pursuant to paragraphs (DDD)(2)(a) and (DDD)(2)(d) of OAC 3745-21-09, the permittee shall submit a test notification to the Cleveland Division of Air Quality (Cleveland DAQ). 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 Cleveland DAQ's refusal to accept the results of the tests. Personnel from the Ohio EPA or its delegated local air agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information during the tests.

d. After completion of the static leak test, dynamic pressure performance test, and inspection the permittee shall complete the post test inspection form contained in Appendix C of rule 3745-21-10 of the Administrative Code and submit it to the Cleveland DAQ within thirty days following the test, and as required in the reporting requirements of this permit.

e. The permittee shall repeat the static leak test and dynamic pressure performance test at intervals not to exceed 5 years**.**

f. The Cleveland DAQ may require the permittee to perform other tests that have been authorized by the U.S. Environmental Protection Agency, if such tests are necessary to demonstrate the adequacy of a vapor control system.

g. The permittee shall perform and comply with any vapor control system tests specified in the applicable CARB certification. The tests shall be performed at the frequency specified for certification.

(2) Compliance with the annual volatile organic compound (VOC) emission limit in b) of these terms and conditions shall be calculated as the sum of the VOC 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. <u>Emission Limitation</u>:

3.29 tons VOC/year.

<u>Applicable Compliance Method</u>:

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 volatile 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: VOC emission factor = 20.0 lbs VOC/1000 gallons.

(b) Gasoline dispensing facility has submerged tank filling with Stage I vapor control for gasoline storage tanks: VOC emission factor = 13.0 lbs VOC/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: VOC emission factor = 3.1 lbs VOC/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: VOC emission factor = 0.027 lb VOC/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.)

g) 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-AD, 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-AD:

a. The equipment approved for use with the Dresser/Wayne WayneVac system is specified in Exhibit 1 of Executive Order G-70-153-AD. 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.

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. 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.

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-70-153-AD:

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.

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-AD. 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.

g. Each nozzle shall be equipped with an integral 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-AD:

a. 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.

b. The permittee shall conduct, and pass, an air-to-liquid ratio test no later than 60 days after startup and at least once in each twelve month period thereafter

(5) The permittee shall comply with the following monitoring requirement from CARB Executive Order G-70-153-AD:

a. 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-AD:

a. In accordance with the yearly static pressure decay testing requirement specified in CARB Executive Order G-70-153-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 Cleveland DAQ shall be notified at least 30 days prior to conducting these annual tests. Test results shall be submitted to the Cleveland DAQ within 30 days of testing.

(7) The permittee shall comply with the following record keeping requirement from CARB Executive Order G-70-153-AD:

a. 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 the Cleveland DAQ and Ohio EPA field office personnel immediately upon request.