PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY
Air Program

33 N. Stone Avenue, Suite 700 ▪ Tucson, AZ 85701 ▪ Phone: (520) 243-7400

AIR QUALITY OPERATING PERMIT

(As required by Title 17.12, Article II, Pima County Code)

GENERAL AIR QUALITY OPERATING PERMIT

For

NESHAP Gasoline Dispensing Facilities

This air quality operating permit does not relieve applicant of responsibility for meeting all air pollution regulations

THIS GENERAL PERMIT ISSUED SUBJECT TO THE SPECIFIC AND ADMINISTRATIVE CONDITIONS IDENTIFIED IN THIS PERMIT.

PDEQ GENERAL PERMIT NUMBER **6096** PERMIT CLASS **II**

ISSUED: **OCTOBER 18, 2010** EXPIRES: **OCTOBER 17, 2015**

Mukonde Chama, P.E., Air Permits Supervisor, PDEQ

SIGNATURE TITLE

TABLE OF CONTENTS

Specific Conditions 3

I. Applicability 3
II. Emission Limits and Standards 3
III. Monitoring and Recordkeeping Requirements 6
IV. Reporting Requirements 7
V. Testing Requirements 7
VI. Pima County Title 17 General Requirements for all Class II Permits 10

Attachment 1: Applicable Regulations 12

Attachment 2: Authorization to Operate (ATO) 13

SPECIFIC CONDITIONS

[References are to Title 17 of the Pima County Code unless otherwise noted]

I. APPLICABILITY

This General Permit applies to any Gasoline Dispensing Facility (GDF), subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) authorized under Title 17 of the Pima County Code, which produces a minimum **yearly** throughput of 6,000,000 gallons and a maximum **yearly** throughput of 13,850,000 gallons. Owners/operators of any new and existing GDF, meeting these throughput criteria, may obtain this General Permit in lieu of an individual permit. Such parties shall acquire an Authorization to Operate (ATO) covering all gasoline storage tanks and associated equipment at the facility. The ATO will attest to the party's formal agreement to abide by all conditions contained herein.

Gasoline means any petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 27.6 kilopascals or greater which is used as a fuel for internal combustion engines.

A Gasoline Dispensing Facility (GDF) means any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle, motor vehicle engine, nonroad vehicle, or nonroad engine, including a nonroad vehicle or nonroad engine used solely for competition. These facilities include, but are not limited to, facilities that dispense gasoline into on- and off-road, street, or highway motor vehicles, lawn equipment, boats, test engines, landscaping equipment, generators, pumps, and other gasoline-fueled engines and equipment.

A source with multiple GDF located within its exterior boundaries should treat each GDF as a separate affected facility for permit application, throughput calculation, and permit compliance.

There are no current federal or local air quality regulations for diesel fuel dispensing facilities. Therefore, diesel fuel is not addressed in this permit. The Permittee shall be required to notify the Control Officer and submit the required revisions should regulations be promulgated for diesel fuel dispensing facilities.

The loading of aviation gasoline into storage tanks at airports (including the subsequent transfer of aviation gasoline within the airport), is not subject to this permit.

Typical GDF emissions comprise of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs). No other criteria air pollutants are likely to be emitted in significant quantities.

II. EMISSION LIMITS AND STANDARDS

A. Operational Limitations

1. The Permittee remains subject to all requirements of this permit even if future throughput falls below the applicable NESHAP thresholds. [40 CFR 63.11111(i)]

   [Federally Enforceable & Material Permit Condition]

2. The Permittee shall not cause, allow or permit the **yearly** throughput of gasoline to exceed 13,850,000 gallons without applying for a Class I, individual permit. [PCC 17.12.190.B]

   [Federally Enforceable & Material Permit Condition]

B. Air Pollution Controls

1. The Permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [40 CFR 63.11116(a)]
[Federally Enforceable & Material Permit Condition]

   a. Minimize gasoline spills;

   b. Clean up spills as expeditiously as practicable;

   c. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use. Portable gasoline containers that meet the requirement of 40 CFR 59, subpart F, are considered acceptable for compliance; [40 CFR 63.11116(d)]

   d. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/waste separators.

2. Portable gasoline tanks, filled from a fixed storage tank at a GDF and used to dispense into on-site motor vehicles or other gasoline-fueled engines within the area source, are subject to II.B.1 of the Specific Conditions. [40 CFR 63.11111(j)]
[Federally Enforceable & Material Permit Condition]

3. The Permittee shall use submerged filling when loading gasoline into storage tanks with greater than 249 gallon capacity. [40 CFR 63.11117(b) & (c)]
[Federally Enforceable & Material Permit Condition]

   a. Submerged fill pipes installed on or before November 9, 2006, must be no more than 12 inches from the bottom of the tank.

   b. Submerged fill pipes installed after November 9, 2006, must be no more than 6 inches from the bottom of the tank;

   c. Submerged fill pipes not meeting these specifications are allowed if the Permittee can demonstrate that the liquid level in the tank is always above the entire opening of the fill pipe.

4. The Permittee shall comply with one of the following vapor balance requirements for all tanks greater than 249 gallons constructed after January 10, 2008 and all tanks greater than 1999 gallons, constructed before January 10, 2008.

   a. Operate a vapor balance system installed prior to January 10, 2008, which meets an enforceable State, local or tribal rule or permit that requires, either: [40 CFR 63.11118(b)(2) & (c)]
[Federally Enforceable & Material Permit Condition]

      i. Achieving an emission reduction of at least 90%, or;

      ii. Operating using management practices at least as stringent as those specified in II.B.4.b.

   b. Operate a vapor balance system during gasoline storage tank loadings using the following management practices: [40 CFR 63.11118(b)(1) & (c), & 40 CFR 63 Subpart CCCCCC, Table 1]
[**Federally Enforceable & Material Permit Condition]**

      i. All vapor connections and lines on the storage tank shall be equipped with closures that

seal upon disconnect.

ii. The vapor line from the gasoline storage tank to the gasoline cargo tank shall be vapor-tight where vapor-tight is defined as:

> *"...equipment that allows no loss of vapors. Compliance with vapor-tight requirements can be determined by checking to ensure that the concentration at a potential leak source is not equal to or greater than 100 percent of the Lower Explosive Limit when measured with a combustible gas detector, calibrated with propane, at a distance of 1 inch from the source."*

iii. The vapor balance system shall be designed such that the pressure in the tank truck does not exceed 18 inches water pressure or 5.9 inches water vacuum during product transfer. The vapor recovery and product adaptors, and the method of connection with the delivery elbows, shall be designed so as to prevent the over-tightening or loosening of fittings during normal delivery operations.

iv. If a gauge well separate from the fill tube is used, it shall be provided with a submerged drop tube that extends the same distance from the bottom of the storage tank as specified in II.B.3 of the Specific Conditions.

v. Liquid fill connections for all systems shall be equipped with vapor-tight caps.

vi. Pressure-vacuum (PV) vent valves shall be installed on the storage tank vent pipes. The pressure specifications for PV vent valves shall be: a positive pressure setting of 2.5 to 6.0 inches of water and a negative pressure setting of 6.0 to 10.0 inches of water. The total leak rate of all PV vent valves at an affected facility, including connections, shall not exceed 0.17 cubic foot per hour at a pressure of 2.0 inches of water and 0.63 cubic foot per hour at a vacuum of 4 inches of water

vii. The vapor balance system shall be capable of meeting the static pressure performance requirement of the following equation:

$$Pf = 2e^{-500.887/v}$$

Where:

Pf = Minimum allowable final pressure, inches of water;
v = Total ullage affected by the test, gallons;
e = Dimensionless constant equal to approximately 2.718;
2 = The initial pressure, inches of water

viii. Equip storage tanks constructed after November 9, 2006 with a dual-point vapor balance system, defined in 40 CFR 63.11132 as having one entry port for filling and a separate exit port for a vapor connection

c. Operate a vapor balance system demonstrated to achieve an emission reduction of 95% or better. [40 CFR 63.6(g), 40 CFR 63.11120(b)(1) & 40 CFR 63 Subpart CCCCCC, Table 3]

[Federally Enforceable Condition]

III. MONITORING AND RECORDKEEPING REQUIREMENTS

A. Operational Limitations

1. The Permittee must, at all times, including periods of startup, shutdown, and malfunction, operate and maintain the GDF, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. [40 CFR 63.6(e)(1)(i) & 40 CFR 63, Subpart CCCCCC, Table 3]

[Federally Enforceable Condition]

2. An affected source shall provide proof of throughput upon request by the Control Officer. [40 CFR 63.11111(e)]

[Federally Enforceable Condition]

3. **Yearly** throughput shall be a **365-day** rolling total, calculated by summing the volume of gasoline loaded into, or dispensed from, all gasoline storage tanks at each GDF during the current day, plus the total volume of gasoline loaded into, or dispensed from, all gasoline storage tanks at each GDF during the previous 364 days. **Monthly** throughput shall be calculated using the **yearly** throughput and dividing that sum by 12. [40 CFR 63.11132]

[Federally Enforceable & Material Permit Condition]

B. Air Pollution Controls

1. The Permittee shall annually inspect the gasoline storage tanks' submerged fill devices. The inspections shall be used to determine whether all of the submerged fill devices are in good working order, according to good modern practices and any available industry practices or recommendations. [PCC 17.12.185.A.3.c]

[Material Permit Condition]

2. The Permittee shall annually inspect the vapor control recovery system(s), all pumps compressors, pipes, hoses mechanical seals or other equipment storing, handling, conveying or controlling VOCs and HAPs. The inspections shall be used to determine whether all equipment is in good working order according to good modern practices and any available manufacturer's recommendations. [PCC 17.12.185.A.3.c]

[Material Permit Condition]

C. Recordkeeping

1. Recordkeeping to document throughput must begin upon startup for a new or reconstructed source and should date back to January 10, 2008 for existing sources. Theses records shall be kept for a period of five (5) years. [40 CFR 63.11111(e)]

2. The Permittee shall record the results of inspections in III.B.1 & 2 in a log showing the following information: [PCC 17.12.185.A.3.c]

[Material Permit Condition]

a. Identification of the device inspected;

b. The date of the inspection;

c. The results of the inspection;

d. Any corrective action taken as a result of the inspection.

3. The Permittee shall keep records of all tests performed under Section V of the Specific Conditions, including details of the conditions under which the tests were performed. The test records shall be kept for a period of five (5) years and shall be made available for inspection by the Control Officer during the course of a site visit or inspection. [40 CFR 63.11125 & 40 CFR 63.11120(c)]

[Federally Enforceable Condition]

4. All other records required by this permit shall be maintained for a minimum of five (5) years including all records that may be necessary to demonstrate compliance with Pima County Code Title 17. [PCC 17.12.185.A.4.b]

IV. REPORTING REQUIREMENTS

A. The Permittee must submit a Notification of Performance Test prior to initiating testing required in V.A and V.B of the Specific Conditions. [40 CFR 63.9(e) & 40 CFR 63.1124(b)(4)]

[Federally Enforceable Condition]

40 CFR 63.9(e) reads as follows: *The owner or operator of an affected source shall notify the Control Officer in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin to allow the Control Officer to review and approve the site-specific test plan required under §63.7(c), if requested by the Control Officer, and to have an observer present during the test.*

B. The Permittee shall submit a Notification of Compliance Status within 60 days of the completion of testing required in V.B of the Specific Conditions. The Notification must be signed by the responsible official who must certify its accuracy and must indicate whether the source has complied with the applicable requirements. [40 CFR 63.11124(b)(2) & 40 CFR 63.9(h)(2)(ii)]

[Federally Enforceable Condition]

C. The Permittee shall report the results of all volumetric efficiency tests required under V.B of the Specific Conditions. These reports must be submitted within 180 days of the completion of the performance testing. [40 CFR 63.11126]

[Federally Enforceable Condition]

D. Annual Emissions Inventory Reporting

When requested by the Control Officer, the Permittee shall complete and submit an annual emissions inventory questionnaire. The questionnaire is due 90 days after the Control Officer makes a written request and shall include emission information for the previous calendar year. The questionnaire shall be on a form provided by, or approved by, the Control Officer and shall include the information required by PCC 17.12.320. [PCC 17.12.320]

V. TESTING REQUIREMENTS

A. A Permittee choosing to operate a vapor balance system according to II.B.4.c of the Specific Conditions must demonstrate the equivalency of the system to that described in II.B.4.b of the Specific Conditions using the following procedures:

1. Demonstrate initial compliance of the 95% reduction achievement by conducting an initial performance test on the vapor balance system using the California Air Resources Board Vapor Recovery Test Procedure TP-201,1,-Volumetric Efficiency for Phase I Vapor Recovery Systems, adopted April 12, 1996, and amended February 1, 2001, and October 8, 2003. (Incorporated by reference, see 63.14). [40 CFR 63.11120(b)(1)]

[Federally Enforceable Condition]

2. During the initial compliance test, determine and document alternative acceptable values for the following: [40 CFR 63.11120(b)(2)]

[Federally Enforceable Condition]

   a. Leak rate and pressure requirements detailed in II.B.4.vii

   b. Static pressure performance requirement details in II.B.4.viii

3. Comply with the testing requirements specified in V.B. [40 CFR 63.11120(b)(3)]

[Federally Enforceable Condition]

B. Permittees subject to II.B.4.b or II.B.4.c of the Specific Conditions must demonstrate initial compliance and repeat that compliance demonstration every 3 years thereafter, by complying with the performance test requirements below:

1. Leak Rate and Pressure Testing

   The Permittee must demonstrate compliance with the leak rate and pressure requirements, specified in II.B.4.b.vii of the Specific Conditions, for PV vent valves installed on all gasoline storage tanks using one of the following test methods: [40 CFR 63.11120(a)(1)]

[Federally Enforceable & Material Permit Condition]

   a. The California Air Resources Board Vapor Recovery Test Procedure TP-201.1E,-Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valves, adopted October 8, 2003 (incorporated by reference, see 40 CFR 63.14).

   b. Alternative test methods and procedures in accordance with the alternative test method requirements in 40 CFR 63.7(f).

2. Static Pressure Performance Testing

   The Permittee must demonstrate compliance with the static pressure performance requirement, specified in II.B.4.b.viii of the Specific Conditions, for the vapor balance system by conducting a static pressure test on all gasoline storage tanks using one of the following test methods: [40 CFR 63.11120(a)(2)]

[Federally Enforceable & Material Permit Condition]

   a. California Air Resources Board Vapor Recovery Test Procedure TP-201.3-Determination of 2-Inch WC Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities, adopted April 12, 1996, and amended March 17, 1999 (incorporated by reference, see § 63.14).

   b. Alternative test methods and procedures in accordance with the alternative test method requirements in 40 CFR 63.7(f).

3. The initial compliance demonstration tests must be conducted:

[40 CFR 63.11113(e)]

[Federally Enforceable & Material Permit Condition]

a. Upon installation for a new affected source, a reconstructed affected source, or an existing source with a vapor balance system installed after December 15, 2009; or,

b. No later than 180 days after the applicable compliance date for an existing source with a vapor balance system installed on or before December 15, 2009.

C. Performance tests conducted as specified in V.A and V.B shall be conducted under normal operating conditions of the source. [40 CFR 63.1120(c)]

[Federally Enforceable & Material Permit Condition]

THE SEAL OF PIMA COUNTY ARIZONA

VI. PIMA COUNTY TITLE 17 GENERAL REQUIREMENTS FOR CLASS II PERMITS

A. Compliance with Permit Conditions

1. The Permittee shall comply with all conditions of this permit including all applicable requirements of the Arizona air quality statutes and the air quality rules. Any permit noncompliance constitutes a violation of the Arizona Revised Statutes and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act. [PCC 17.12.185.A.7.a]

2. The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. The report shall be in 2 parts as specified below: [PCC 17.12.185.A.5 & PCC 17.12.040]

   a. Notification by telephone or facsimile within 24 ours of the time the Permittee first learned of the occurrence of excess emission that includes all available information pursuant to PCC 17.12.040.B To report excess emissions call 520-243-7400 or fax to 520-243-7370.

   b. Detailed written notification by submission of an excess emissions report within 72 hours of the notification in VI.A.2.a above. Send to PDEQ, 33 N. Stone Ave., Suite 700, Tucson, AZ 85701.

3. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [PCC 17.12.185.A.7.b]

4. The permit does not convey any property rights of any sort, or any exclusive privilege to the permit holder. [PCC 17.12.185A.7.d]

5. The Permittee shall pay fees to the Control Officer pursuant to PCC 17.12.520. [PCC 17.12.185.A.8 & PCC 17.12.520]

B. Permit Revision, Reopening, Revocation and Reissuance, or Termination for Cause

The permit may be revised, reopened, revoked and reissued, or terminated for cause pursuant to PCC 17.12.270. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination; or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [PCC 17.12.185.A.7.c]

C. Duty to Provide Information

1. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee shall furnish a copy of such records to the Control Officer along with a claim of confidentiality. [PCC 17.12.185.A.7.e]

2. If the Permittee has failed to submit any relevant facts or if the Permittee has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. [PCC 17.12.165.G]

D. Severability Clause

The provisions of this permit are severable. If any provision of this permit is held invalid, the remainder of this permit shall not be affected thereby. [PCC 17.12.185.A.6]

E. Facility Changes

Should the Permittee desire to change the facility or operations in any way (including, but not limited to, addition of new equipment, modifications of current equipment or usage of fuels not specified within this permit), the Permittee shall first submit the proper notifications and follow the required permit revision procedure pursuant to PCC 17.12.240, PCC 17.12.255, or PCC 17.12.260.

ATTACHMENT 1

APPLICABLE REGULATIONS

Requirements Specifically Identified as Applicable

Code of Federal Regulations (CFR) Chapter 40 Part 63:

Subpart CCCCCC	National Emission Standards for Hazardous Air Pollutants for Source Categories: Gasoline Dispensing Facilities

Pima County Code (PCC) Title 17:

17.12.185	Permit Contents for Class II and Class III permits

ATTACHMENT 2

AUTHORIZATION TO OPERATE (ATO)

UNDER PIMA COUNTY GENERAL AIR QUALITY CONTROL PERMIT FOR NESHAP GASOLINE DISPENSING FACILITY

(As required by Title 49, Chapter 3, Article 2, Section 49-480, Arizona Revised Statutes)

I. FACILITY INFORMATION:

Business Name: [BUSINESS NAME]
Facility Name: [FACILITY NAME]
Responsible Official: [RESPONSIBLE OFFICIAL]
Contact: [CONTACT]
Source Location: [ADDRESS]
[CITY], [ST] [ZIP]

II. AUTHORIZED EQUIPMENT:

ATO #	TANK				SUBMERGED FILL DEVICE		VAPOR BALANCE SYSTEM	
	ID	VOLUME (Gallons)	MANUFACTURE DATE	INSTALLATION DATE	INSTALLATION DATE	TANK BOTTOM CLEARANCE	TYPE	INSTALLATION DATE
			≤1/10/08 or >1/10/08	≤11/9/06 or >11/9/06	≤11/9/06 or >11/9/06	≤ 12” or ≤6” or Other	Coaxial or Dual Point or Manifold Duel Point or N/A	≤12/15/09 or >12/15/09

III. THROUGHPUT LIMITATION (Facility-wide)

Maximum Yearly Throughput (gallons*): [GALLONS]

*Gallons, as used in this document, shall mean net gallons defined as the volume of gasoline corrected to a reference temperature of 60 degrees Fahrenheit.

Month xx, 2010 — October 17, 2015

SIGNATURE — ISSUE DATE — EXPIRATION DATE

Mukonde Chama, P.E. Air Permits Supervisor, PDEQ
TITLE