



February 11, 2021

Marc Westfall  
7-Eleven, Inc.  
Attn: Environmental Compliance  
PO Box 711  
Dallas, TX 75221-0711

Subject: Final Approval for Gasoline Dispensing Facility with EVR Two-Point Stage I Vapor Recovery Systems and ORVR-Compatible Stage II Vapor Recovery Systems – 7-Eleven No. 22525

Dear Mr. Westfall:

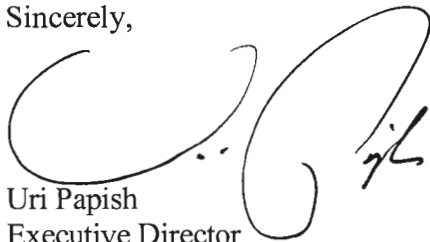
A final determination to issue Air Discharge Permit 21-3450 has been completed for Air Discharge Permit Application CL-3150 pursuant to Section 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for Air Discharge Permit Application CL-3150 was published in the permit section of SWCAA's internet website on January 14, 2021. SWCAA did not receive a request for a public comment period in response to the public notice and has concluded that significant public interest does not exist for this determination. Therefore, a public comment period was not provided for this permitting action. Electronic copies of Air Discharge Permit 21-3450 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (<http://www.swcleanair.org/permits/adpfinal.asp>). Original copies are enclosed for your files.

Please note that this permit limits gasoline throughput to 5,000,000 gallons per year. If actual throughput exceeds expectations and is projected to exceed 5,000,000 gallons on an annual basis, you will need to contact SWCAA for a permit modification.

This Air Discharge Permit may be appealed directly to the Pollution Control Hearings Board (PCHB) at PO Box 40903, Olympia, Washington 98504-0903 as provided in RCW 43.21B within 30 days of receipt.

If you have any comments, or desire additional information, please give Clint Lamoreaux or me a call at (360) 574-3058, extension 131.

Sincerely,



Uri Papish  
Executive Director

UP: cl

Enclosures: Air Discharge Permit 21-3450 and Technical Support Document



**SOUTHWEST CLEAN AIR AGENCY**

**AIR DISCHARGE PERMIT  
SWCAA 21-3450**

**Issued: February 11, 2021**

Facility Name: 7-Eleven No. 22525  
Physical Location: 9411 NE 76<sup>th</sup> Street  
Vancouver, WA 98662

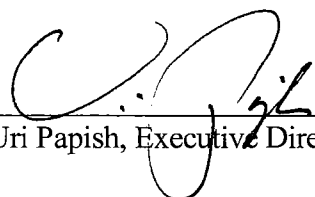
SWCAA ID: 875

REVIEWED BY:

  
Paul T. Mairose, Chief Engineer



APPROVED BY:

  
Uri Papish, Executive Director

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## 1. Equipment/Activity Identification

| ID No. | Generating Equipment/Activity       | # of Units | Control Measure/Equipment  | # of Units |
|--------|-------------------------------------|------------|--|------------|
| 1      | Retail Gasoline Dispensing Facility | 1          | Stage I Enhanced Vapor Recovery Systems, Stage II Vapor Recovery Systems, Low Permeation Hoses | 2          |

## 2. Permit Terms and Conditions

The following tables detail the specific terms and conditions of this permit. In addition to the requirements listed below, equipment at this facility may be subject to additional federal, state, and local regulations. The permit term or condition number is identified in the left-hand column. The permit term or condition is contained in the middle column. The identification number (ID No.) of the emission unit, equipment, or activity to which the permit term or condition applies is listed in the right-hand column.

### Emission Limits

| No. | Emission Limits   | Equipment/Activity |
|-----|---|--------------------|
| 1.  | Emissions of volatile organic compounds must not exceed 2.62 tons in any calendar year. | 1                  |

### Operating Limits and Requirements

| No. | Operating Limits and Requirements  | Equipment/Activity |
|-----|--|--------------------|
| 2.  | The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.  | 1                  |
| 3.  | Gasoline throughput must not exceed 5,000,000 gallons per year.  | 1                  |
| 4.  | The Stage I vapor recovery systems must be connected and properly operated at all times during fuel receiving operations.  | 1                  |
| 5.  | As installed, the end of the submerged fill line must be totally submerged when the liquid level in the tank is six inches from the bottom of the tank.  | 1                  |
| 6.  | Each nozzle from which gasoline is dispensed must have a maximum fuel flow rate not to exceed ten (10) gallons per minute.   | 1                  |
| 7.  | Whenever a Stage I vapor recovery system component is determined to be defective or not operating properly, the system must be removed from service until repairs can be completed.  | 1                  |
| 8.  | Rotatable Stage I adaptors must be capable of at least 360-degree rotation and have an average static torque not to exceed 108 pound-inches. Compliance with this requirement must be determined using the latest CARB adopted version of TP-201.1B. | 1                  |

| No. | Operating Limits and Requirements   | Equipment/<br>Activity |
|-----|---|------------------------|
| 9.  | Pressure/vacuum valve(s) must be installed and maintained with a positive pressure setting of 2.5 – 6.0 inches water column and a negative pressure setting of 6.0 – 10.0 inches water column. The leak rate of each pressure/vacuum valve, including connections, must not exceed 0.05 cubic foot per hour at a pressure of 2.0 inches water column and 0.21 cubic foot per hour at a vacuum of 4 inches water column. The total leak rate for all pressure/vacuum valves, including connections, must not exceed 0.17 cubic foot per hour at a pressure of 2.0 inches water column and 0.63 cubic foot per hour at a vacuum of 4 inches water column. | 1                      |
| 10. | No alterations of equipment, parts, design, or operation of the Stage I gasoline vapor recovery systems as certified by CARB are allowed without prior approval from SWCAA.   | 1                      |
| 11. | Spill buckets must be maintained free of liquid and solid materials.  | 1                      |
| 12. | The Stage II vapor recovery systems must be connected and properly operated at all times during vehicle fueling operations.   | 1                      |
| 13. | Whenever a Stage II vapor recovery system component is determined to be defective or not operating properly, the system must be removed from service until repairs can be completed.  | 1                      |
| 14. | No alterations of equipment, parts, design, or operation of the Stage II gasoline vapor recovery system as certified by CARB are allowed without prior approval from SWCAA.   | 1                      |
| 15. | Unless otherwise directed by SWCAA, the air to liquid ratio of the Stage II vapor recovery system must be no less than 0.90 and no greater than 1.10.   | 1                      |
| 16. | Only unihose style gasoline dispensers may be used (one gasoline hose and nozzle per fueling point), except that a second hose and nozzle may be used for non-ethanol gasoline.   | 1                      |
| 17. | All gasoline dispensing hoses must be low permeation hoses. Low permeation hoses are hoses that permeate no more than 10.0 grams per square meter per day, as determined by Underwriters Laboratories' Standard 330.  | 1                      |

### Monitoring and Recordkeeping Requirements

| No. | Monitoring and Recordkeeping Requirements   | Equipment/<br>Activity |
|-----|---|------------------------|
| 18. | All maintenance and repairs to vapor recovery systems and equipment must be recorded for each occurrence.                   | 1                      |
| 19. | The total gasoline throughput must be recorded for each calendar year.  | 1                      |
| 20. | Each record required by this Air Discharge Permit must include the date and the name of the person making the record entry. | 1                      |

| No. | Monitoring and Recordkeeping Requirements   | Equipment/<br>Activity |
|-----|---|------------------------|
| 21. | All records required by this Air Discharge Permit (including the results of all required monitoring or testing and all required reports) must be readily available for a minimum period of no less than five years and must be available for inspection by SWCAA representatives. | 1                      |

### Emission Monitoring and Testing Requirements

| No. | Emission Monitoring and Testing Requirements  | Equipment/<br>Activity |
|-----|---|------------------------|
| 22. | <p>The following testing must be conducted and passed for each underground storage tank prior to placing the equipment into service and at least once every 12 months thereafter, no later than the end of the calendar month during which the initial test was conducted. This testing must be conducted using the latest version of the following procedures:</p> <ul style="list-style-type: none"> <li>(a) CARB Test Procedure 201.3 (TP-201.3) "Determination of 2 Inch w.c. Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities;"</li> <li>(b) CARB Test Procedure 201.1B (TP-201.1B) "Static Torque of Rotatable Phase I Adaptors;" and</li> <li>(c) Depending on the system configuration, either Test Procedure 201.1C (TP-201.1C) "Leak Rate of Drop Tube/Drain Valve Assembly" or Test Procedure 201.1D (TP-201.1D) "Leak Rate of Drop Tube Overfill Prevention Devices and Spill Container Drain Valves." For remote fill configurations, the testing must incorporate the "required items" identified in Exhibit 6 of CARB Executive Order VR-102-U.</li> </ul> <p>This facility is required to utilize pressure/vacuum valves with a minimum design cracking pressure of 2.5 inches water column; therefore, all testing must be conducted with the valves installed, without bagging the valves, and without obstructing pipe connections to the valves.</p> <p>Records of the above testing must be maintained by the permittee for a period of at least five years.</p> | 1                      |

| No. | Emission Monitoring and Testing Requirements  | Equipment/<br>Activity |
|-----|---|------------------------|
| 23. | <p>Initially (no later than 90 days after startup) and at least once every 36 months thereafter (no later than the end of the calendar month during which the initial test was conducted), the testing specified in 40 CFR 63 Subpart CCCCCC must be conducted and passed. This testing must be conducted using the following procedures:</p> <ul style="list-style-type: none"> <li>(a) CARB Test Procedure 201.1E (TP-201.1E) "Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valves" adopted October 8, 2003; and</li> <li>(b) CARB Test Procedure 201.3 (TP-201.3) "Determination of 2 Inch w.c. Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities."<sup>1</sup></li> </ul> <p>Records of the above testing must be maintained by the permittee for a period of at least five years.</p> <p><sup>1</sup> The annual TP-201.3 test required to verify the performance of the Stage I vapor recovery systems will also satisfy the requirement to conduct TP-201.3 for Subpart CCCCCC.</p>  | 1                      |
| 24. | <p>Prior to placing new equipment into service and at least once every 12 months thereafter (no later than the end of the calendar month during which the initial test was conducted), the testing specified in CARB Executive Order G-70-191-AA (included as Appendix B of the Technical Support Document for this Permit) must be conducted and passed. This testing must be conducted using the latest versions of the following procedures:</p> <ul style="list-style-type: none"> <li>(a) CARB Test Procedure 201.3 (TP-201.3) "Determination of 2 Inch w.c. Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities"<sup>1</sup>;</li> <li>(b) CARB Test Procedure 201.5 (TP-201.5) "Air to Liquid Volume Ratio"; and</li> <li>(c) The procedure to verify the integrity of the vapor valve described in Section 4 of Exhibit 2 of CARB Executive Order G-70-191-AA (also known as the "Nozzle Bag Test Procedure").</li> </ul> <p>Records of the above testing must be maintained by the permittee for a period of at least five years.</p> <p><sup>1</sup> The annual TP-201.3 test required to verify the performance of the Stage I vapor recovery systems will also satisfy the requirement to conduct TP-201.3 to verify the performance of the Stage II vapor recovery systems.</p> | 1                      |
| 25. | <p>Whether the underground storage tanks have a vapor manifold with one another must be determined prior to placing the equipment into service. The following testing must be performed to determine the vapor piping configuration:</p> <ul style="list-style-type: none"> <li>(a) CARB Test Procedure 201.3C (TP-201.3C) "Determination of Vapor Piping Connections to Underground Storage Tanks (Tie-Tank Test)."</li> </ul> <p>Records of the above testing must be maintained by the permittee for a period of at least five years.</p>  | 1                      |

**Reporting Requirements**

| <b>No.</b> | <b>Reporting Requirements</b>  | <b>Equipment/<br/>Activity</b> |
|------------|--|--------------------------------|
| 26.        | <p>The permittee must provide an Initial Notification that the facility is subject to 40 CFR 63 Subpart CCCCCC to EPA Region 10 and SWCAA no later than the date the facility begins operation in accordance with 40 CFR 63.11124. The Initial Notification must contain the following information:</p> <ul style="list-style-type: none"> <li>(a) The address (i.e. physical location) of the gasoline dispensing facility;</li> <li>(b) A statement that the notification is being submitted in response to 40 CFR 63 Subpart CCCCCC; and</li> <li>(c) Identification of the requirements in paragraphs (a) through (c) of 40 CFR 63.11117 that apply.</li> </ul> <p>The permittee must submit a Notification of Compliance Status to EPA Region 10 and SWCAA within 60 days of startup. The Notification of Compliance Status must be signed by a responsible official who must certify its accuracy and must indicate whether the facility has complied with the requirements of 40 CFR 63 Subpart CCCCCC. In addition, the Notification of Compliance Status must indicate whether the facility's monthly gasoline throughput is calculated based on the volume of gasoline loaded into all storage tanks or the volume of gasoline dispensed from all storage tanks. If the facility is in compliance upon startup (compliance upon startup is a requirement of this Air Discharge Permit), the Notification of Compliance Status may be submitted in lieu of the Initial Notification provided it contains all of the information required in the Initial Notification.</p> | 1                              |
| 27.        | The permittee must notify SWCAA in writing within ten (10) days after completing initial startup of the rebuilt facility. This will allow proper inspections and observations to be conducted for the new equipment.   | 1                              |
| 28.        | The results of testing required by this Permit must be reported to SWCAA within 14 days of test completion.  | 1                              |
| 29.        | <p>Excess emissions must be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> <li>(a) As soon as possible, but no later than 12 hours after discovery for emissions that represent a potential threat to human health or safety;</li> <li>(b) As soon as possible, but no later than 48 hours after discovery for emissions which the permittee wishes to claim as unavoidable pursuant to SWCAA 400-107(1); and</li> <li>(c) For all other excess emissions, no later than 30 days after the end of the month during which the deviation is discovered.</li> </ul>   | Facilitywide                   |
| 30.        | Deviations from permit conditions must be reported no later than 30 days after the end of the month during which the deviation is discovered.  | Facilitywide                   |
| 31.        | Gasoline throughput must be reported annually to SWCAA by January 31 <sup>st</sup> for the previous calendar year unless otherwise directed by SWCAA.  | 1                              |
| 32.        | Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs) must be reported annually to SWCAA by January 31 <sup>st</sup> for the previous calendar year unless otherwise directed by SWCAA.   | 1                              |



### 3. General Provisions

| No. | General Provisions  |
|-----|---|
| A.  | The emission units specified in this Permit must be maintained and operated in total and continuous conformity with the emission limits identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.  |
| B.  | For the purpose of ensuring compliance with this Permit, duly authorized representatives of the Southwest Clean Air Agency must be permitted access to the permittee's premises and the facilities being constructed, owned, operated and/or maintained by the permittee for the purpose of inspecting said facilities. These inspections are required to determine the status of compliance with this Permit and applicable regulations and to perform or require such tests as may be deemed necessary. |
| C.  | The provisions, terms and conditions of this Permit shall be deemed to bind the permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the permittee.  |
| D.  | The requirements of this Permit shall survive any transfer of ownership of the source or any portion thereof.   |
| E.  | This Air Discharge Permit must be posted conspicuously at or be readily available near the source.  |
| F.  | Approval to construct or modify specific equipment shall become invalid if construction is not commenced within eighteen months after the date of issuance of this Permit, if construction is discontinued for a period of eighteen months or more, or if construction is not completed within a reasonable time.   |
| G.  | This Air Discharge Permit does not supersede requirements of other Agencies with jurisdiction and further, this Permit does not relieve the permittee of any requirements of any other governmental Agency. In addition to this Permit, the permittee may be required to obtain permits or approvals from other agencies with jurisdiction.   |
| H.  | Compliance with the terms of this Air Discharge Permit does not relieve the permittee from the responsibility of compliance with SWCAA's General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70.94, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.  |
| I.  | If any provision of this Air Discharge Permit is held to be invalid, all unaffected provisions of the Permit shall remain in effect and be enforceable.   |
| J.  | No change in this Permit shall be made or be effective except as may be specifically set forth by written order of the Southwest Clean Air Agency upon written application by the permittee for the relief sought.  |
| K.  | The Southwest Clean Air Agency may, in accordance with RCW 70.94 impose such conditions as are reasonably necessary to assure the maintenance of compliance with the terms of this Permit, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.   |