



July 27, 2021

Brian Peck
Peck Petroleum
7801 NE St. Johns Road
Vancouver, WA 98665

Subject: Final Approval for Installation of Above-Ground Storage Tank with Stage I Vapor Recovery – Peck Petroleum

Dear Mr. Peck:

A final determination to issue Air Discharge Permit 21-3474 has been completed for Air Discharge Permit Application CL-3168 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-3168 was published in the permit section of SWCAA's internet website on June 30, 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 21-3474 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 21-3474 and Technical Support Document



SOUTHWEST CLEAN AIR AGENCY

**AIR DISCHARGE PERMIT
SWCAA 21-3474**

Issued: July 27, 2021

Facility Name: Peck Petroleum
Physical Location: 7801 NE St. Johns Road
Vancouver, WA 98665

SWCAA ID: 784

REVIEWED BY:


Paul T. Mairose, Chief Engineer



APPROVED BY:

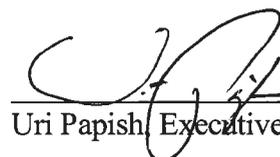

Uri Papish, Executive Director

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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 Vapor Recovery Systems	1

2. Approval 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.

Air Discharge Permit 20-3434 is superseded in its entirety by this Air Discharge Permit.

Emission Limits

No.	Emission Limits	Equipment/Activity
1.	Emissions of volatile organic compounds must not exceed 4.59 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.	The gasoline storage tanks must utilize separate fill and vapor recovery points.	1
7.	Each nozzle from which gasoline is dispensed must have a maximum fuel flow rate not to exceed ten (10) gallons per minute.	1
8.	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

No.	Operating Limits and Requirements	Equipment/ 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.	Only unihose style gasoline dispensers may be used (one gasoline hose and nozzle per fueling point), except when dispensing both alcohol-containing gasoline and alcohol free gasoline at a single fueling point. Two hoses may be used, one for alcohol-containing gasoline and one for alcohol free gasoline, at fueling points dispensing both of those fuel types.	1
13.	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
14.	All gasoline dispensing nozzles must be Enhanced Conventional (ECO) Nozzles. ECO Nozzles are conventional nozzles that comply with CARB performance standards in Certification Procedure 207 (CP-207).	1

Monitoring and Recordkeeping Requirements

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
15.	All maintenance and repairs to the Stage I vapor recovery systems and equipment must be recorded for each occurrence.	1
16.	The total gasoline throughput must be recorded for each calendar year.	1
17.	Each record required by this Air Discharge Permit must include the date and the name of the person making the record entry.	1
18.	All records required by this Air Discharge Permit (including the results of all required monitoring or testing and all required reports) must be maintained in a form readily available for inspection by SWCAA representatives.	1

Emission Monitoring and Testing Requirements

No.	Emission Monitoring and Testing Requirements	Equipment/ Activity
19.	<p>The following testing must be conducted and passed for each gasoline storage tank at least once every 12 calendar months. This testing must be conducted using the latest version of the following procedures as applicable:</p> <ul style="list-style-type: none"> (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;" or (b) CARB Test Procedure 202.1B (TP-201.3B) "Determination of Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities with Above-Ground Storage Tanks." <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>For the underground storage tanks, the minimum allowable final pressure after 5 minutes with an initial pressure of 2.0 inches w.c. is provided by the equation: $P_f = 2e^{-500.887/v}$</p> <p><u>Where:</u> 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 water</p> <p>Records of the above testing must be maintained by the permittee for a period of at least five years.</p>	1
20.	<p>The following testing must be conducted and passed for each pressure/vacuum valve at least once every 36 months in accordance with SWCAA 491.</p> <ul style="list-style-type: none"> (a) CARB Test Procedure 201.1E (TP-201.1E) "Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valves" adopted October 8, 2003. <p>If a particular pressure/vacuum vent valve has been tested in accordance with TP-201.1E at the factory, then testing of that valve is not due until 36 months following initial installation. If a new pressure/vacuum valve is installed in lieu of testing, installation of the new valve must be documented in lieu of generating a test report. Records of the above testing must be maintained by the permittee for a period of at least five years.</p>	1

Reporting Requirements

No.	Reporting Requirements	Equipment/ Activity
21.	The results of testing required by this Permit must be reported to SWCAA within 14 days of test completion.	1

No.	Reporting Requirements	Equipment/ Activity
22.	<p>Excess emissions must be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> (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; (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; and (c) For all other excess emissions, no later than 30 days after the end of the month during which the deviation is discovered. 	Facilitywide
23.	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
24.	Gasoline throughput must be reported annually to SWCAA by January 31 st for the previous calendar year unless otherwise directed by SWCAA.	1
25.	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 st 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.

No.	General Provisions
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.

**State Environmental Policy Act
DETERMINATION OF SEPA EXEMPT - SWCAA 21-022**

Description of proposal:

ADP Application CL-3168: The proponent has applied for a permit to install an above-ground gasoline storage tank at an existing gas station. The new gasoline storage tank will be an additional source of gasoline vapor emissions. Due to the increased fleet penetration of on-board carbon canisters in individual vehicles that collect gasoline vapors from vehicle refueling, emissions from this facility will be significantly lower than they were when this facility was new, even with installation of the additional gasoline storage tank. This permitting action is not expected to have any impact on any other element of the environment including traffic, noise, glare, housing, or recreation opportunities.

Proponent:

Peck Petroleum

Location of proposal, including street address if any:

7801 NE St. Johns Road, Vancouver, WA 98665

Lead agency: Southwest Clean Air Agency

The lead agency for this proposal has determined that the proposed project is exempt from SEPA under WAC 197-11-800(3) as follows: "The repair, remodeling, maintenance, or minor alteration of existing private or public structures, facilities or equipment, including utilities, recreation, and transportation facilities involving no material expansions or changes in use beyond that previously existing; ...". The proposed project is identified as maintenance of existing equipment and as such it does not have a probable significant impact on the environment. Neither an environmental checklist nor an environmental impact statement (EIS) is required under RCW 43.21C.030(2)(c). This decision was made by the lead agency after review of the proponent's proposal and the information on file with the lead agency. This information is available to the public on request.

This project/permitting action by SWCAA is SEPA exempt.

Responsible official: Paul T. Mairose, P.E.

Position/title: Chief Engineer

Address: Southwest Clean Air Agency
11815 NE 99th St, Suite 1294
Vancouver, WA 98682-2322

Phone: (360) 574-3058 ext. 130

Signature: Paul T. Mairose

Date: 7/27/2021

