



May 12, 2025

Shawn Carter-Elton
Safeway, Inc.
PO Box 473
Amboy, WA 98601

Subject: Final Approval for Removal of Stage II Vapor Recovery Systems – Safeway 2637

Dear Shawn Carter-Elton:

A final determination to issue Air Discharge Permit (ADP) 25-3709 has been completed for ADP Application CO-1114 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 CO-1114 was published in the permit section of SWCAA's internet website on March 20, 2025. 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 25-3709 and the associated Technical Support Document are available for public review in the "Recent Air Discharge Permits" section under the "Air Permits" link on SWCAA's website (<http://www.swcleanair.gov>). Original copies are enclosed for your files.

Please note that this permit limits gasoline throughput to 6,450,000 gallons per year. If actual throughput is projected to exceed 6,450,000 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) 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: Technical Support Document and Air Discharge Permit 25-3709





SWCAA
Southwest Clean Air Agency

AIR DISCHARGE PERMIT
25-3709

Issued: May 12, 2025

Safeway No. 2637
411 Three Rivers Drive, Kelso, WA

SWCAA ID – 2286

REVIEWED BY:

Clinton Lamoreaux, Chief Engineer



APPROVED BY:

Uri Papish, Executive Director

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1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Equipment/Measure
1	Retail Gasoline Dispensing Facility	Stage I Vapor Recovery Systems

2. Permit Requirements

The following tables detail the specific requirements of this Air Discharge Permit (ADP). In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The requirement number is identified in the left-hand column. The text of the requirement is contained in the middle column. The emission unit, equipment, or activity to which the requirement applies is listed in the right-hand column.

Air Discharge Permit 19-3360 is superseded in its entirety by this Air Discharge Permit.

Emission Limits

Req. No.	Emission Limits	Equipment/Activity ID No.
1.	Emissions of volatile organic compounds must not exceed 4.78 tons in any calendar year.	1

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/Activity ID No.
2.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	1
3.	Gasoline throughput must not exceed 6,450,000 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, hose, or nozzle is determined to be defective or not operating properly, the affected system or pump 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

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
9.	The leak rate of the spill container drain valve (if installed) must not exceed 0.17 cubic foot per hour at a pressure of 2.0 inches water column. Compliance with this requirement must be determined using the latest CARB adopted version of 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." If a drain plug is installed instead of a drain valve, the drain plug must not leak. The absence of vapor leaks is verified with the use of commercial liquid leak detection solution when the vapor space of the fill pipe is subjected to a positive pressure.	1
10.	The leak rate of the drop tube overfill prevention device (if installed) must not exceed 0.17 cubic foot per hour at a pressure of 2.0 inches water column. Compliance with this requirement must be determined using the latest CARB adopted version of Test Procedure 201.1D (TP-201.1D) "Leak Rate of Drop Tube Overfill Prevention Devices and Spill Container Drain Valves."	1
11.	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
12.	No alterations of equipment, parts, design, or operation of the Stage I gasoline vapor recovery systems as certified by CARB Executive Order VR-101-G or superseding executive orders are allowed without prior approval from SWCAA.	1
13.	Spill buckets must be maintained free of liquid and solid materials.	1
14.	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
15.	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
16.	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

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

Req. No.	Emission Monitoring and Testing Requirements	Equipment/ Activity ID No.
21.	<p>The following testing must be conducted and passed for each gasoline storage tank prior to placing the new equipment into service following removal of the Stage II vapor recovery equipment, and at least once every 12 months thereafter. This testing must be conducted using the latest version of the following procedures:</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;" (b) CARB Test Procedure 201.1B (TP-201.1B) "Static Torque of Rotatable Phase I Adaptors;" and (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" as applicable. Neither test is required if there is no drain valve or overfill protection device. <p>This facility is required to utilize pressure/vacuum valves with a minimum design cracking pressure of 2.5 inches water column; therefore, static pressure performance testing of the underground storage tanks must be conducted with the valves installed, without bagging the valves, and without obstructing pipe connections to the valves.</p> <p>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> P_f = 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>	1

Req. No.	Emission Monitoring and Testing Requirements	Equipment/ Activity ID No.
22.	<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. The testing must be conducted using the latest version of the following procedure:</p> <p>(a) CARB Test Procedure 201.1E (TP-201.1E) "Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valves."</p> <p>The pressure/vacuum valves proposed for, and allowed for use at, this facility are required to be factory tested prior to sale/installation. For a new pressure/vacuum valve, the factory test satisfies the requirement for an initial test; therefore, the first test is due 36 months after initial installation of a new pressure/vacuum valve. 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.</p>	1

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
23.	The permittee must notify SWCAA in writing within ten (10) calendar days after completing installation of the new vapor recovery equipment approved by this Air Discharge Permit. This will allow proper inspections and observations to be conducted for the new equipment.	1
24.	The results of testing required by this Permit must be reported to SWCAA within 14 calendar days of test completion. Where a factory test of a newly installed pressure/vacuum valve is relied upon in lieu of a new test conducted in accordance with CARB Test Procedure TP-201.1E, documentation of installation of the new pressure/vacuum valve must be submitted in lieu of the test results.	1
25.	<p>Excess emissions must be reported to SWCAA as follows:</p> <p>(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;</p> <p>(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</p> <p>(c) For all other excess emissions, no later than 30 calendar days after the end of the month during which the deviation is discovered.</p>	Facility-wide
26.	Deviations from permit conditions must be reported no later than 30 calendar days after the end of the month during which the deviation is discovered.	Facility-wide
27.	Gasoline throughput must be reported annually to SWCAA by January 31 st for the previous calendar year unless otherwise directed by SWCAA.	1

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
28.	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

Req. 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 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 ADP survive any transfer of ownership of the source or any portion thereof.
E.	This ADP must be posted conspicuously at or be readily available near the source.
F.	This ADP will be invalidated, in whole or in part, if construction or installation of any new or modified equipment has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more without prior SWCAA approval, or if construction is not completed within a reasonable time.
G.	This ADP does not supersede requirements of other agencies with jurisdiction and further, this ADP does not relieve the Permittee of any requirements of any other governmental agency. In addition to this ADP, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
H.	Compliance with the terms of this ADP does not relieve the Permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70A.15, 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 ADP is held to be invalid, all unaffected provisions of the ADP will remain in effect and be enforceable.
J.	No change in this ADP will 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.

Req. No.	General Provisions
K.	The Southwest Clean Air Agency may, in accordance with RCW 70A.15, impose such conditions as are reasonably necessary to assure the maintenance of compliance with the terms of this ADP, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.
L.	For the purposes of establishing if a condition of this ADP has been violated or is being violated, nothing in this ADP precludes the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test procedures or methods had been performed.