

August 2008

Gasoline Dispensing Facilities: Know Your EPA Regulations

A gasoline dispensing facility (GDF) is a private or public facility where gasoline is dispensed into vehicle fuel tanks. Gasoline vapors are released from a GDF when underground storage tanks are filled and when gasoline is dispensed into vehicle fuel tanks. Because gasoline vapors contribute to ozone pollution, Ohio EPA regulations require owners of GDFs in certain counties to have equipment to capture these vapors to prevent them from being released to the atmosphere. In addition, Ohio EPA and local air agencies inspect and test the vapor control equipment at GDFs to help keep the air clean in major metropolitan areas. (See map on page 2.)

The two main types of vapor control equipment at GDFs are known as Stage I and Stage II vapor controls.

Stage I emission controls reduce the amount of gasoline vapors released when underground tanks are filled. This equipment uses a combination of pipes and hoses to collect displaced gasoline vapors from the tank and route them back into the delivery truck. A submerged fill pipe, or "drop tube," consisting of a tube installed to within 6 inches of the bottom of the tank, significantly reduces splashing and vapor generation as the tank is filled.

Stage II emission controls reduce gasoline vapors when gasoline is dispensed into vehicle fuel tanks. This equipment captures displaced vapors at the vehicle fill neck and routes them back to the underground storage tank.

What does "CARB-certified" mean?

It means the vapor control system and component parts such as valves, nozzles, and pumps have been evaluated and certified by the California Air Resources Board. All GDFs in Ohio that are required to have Stage II controls must use CARB-certified equipment, including CARB-certified replacement parts that are compatible with each system.

You can obtain information on the CARB certification (Executive Order) and CARB-approved parts for your system from the Stage II equipment manufacturer, your Ohio EPA field office, or from the CARB Web site at <http://arbis.arb.ca.gov/vapor/vapor.htm>. Contact your Ohio EPA district office or local air agency with questions regarding the CARB requirements.

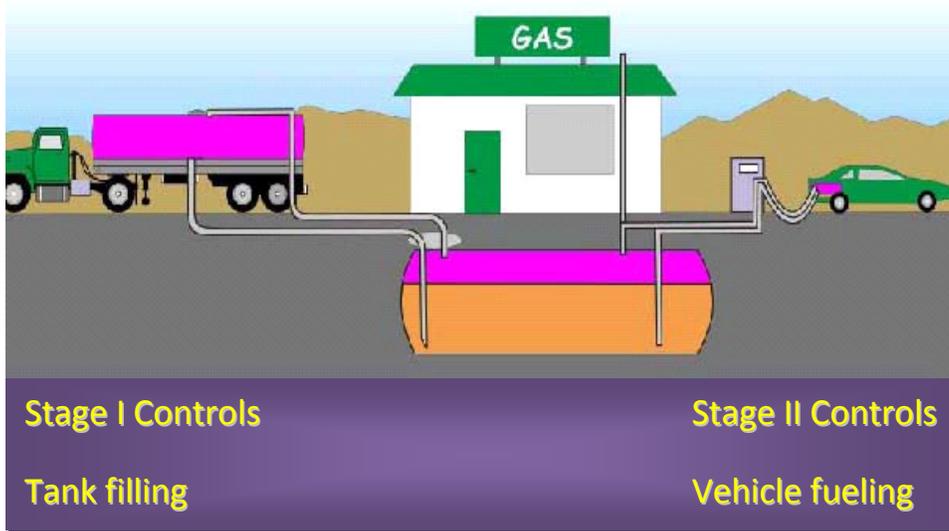


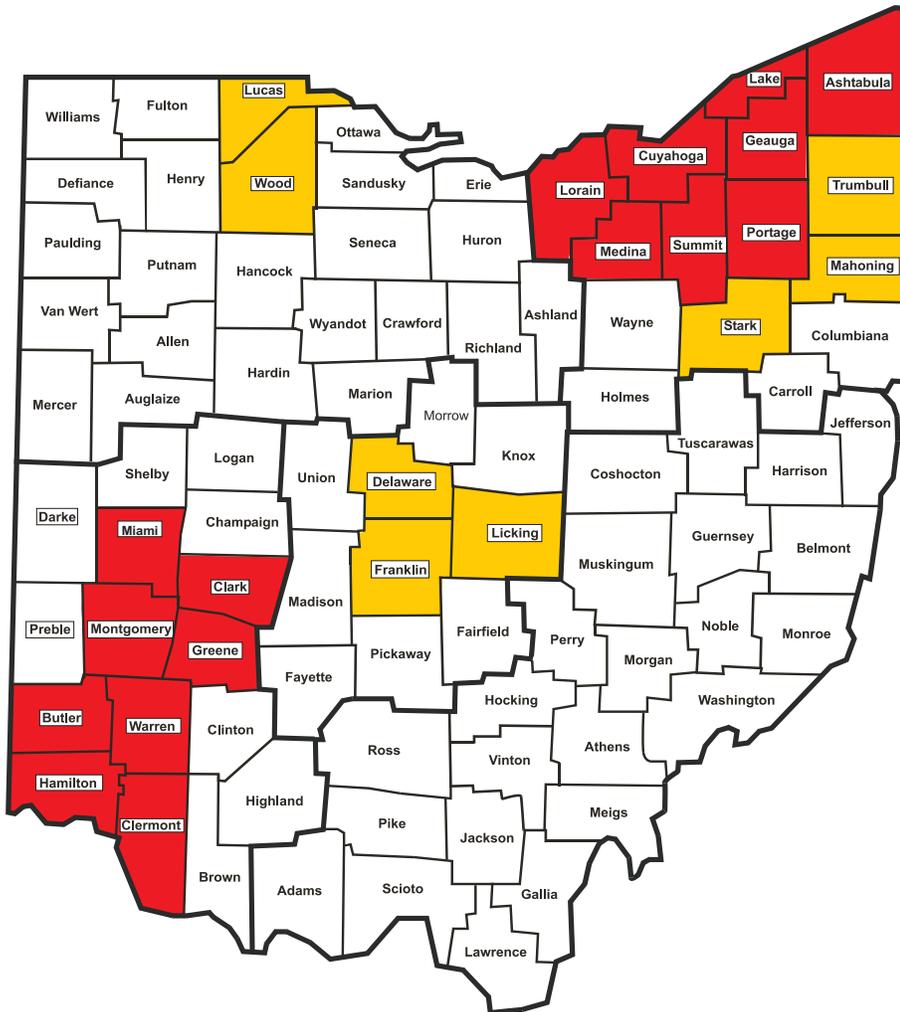
Image courtesy of the California Air Resources Board

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Where in Ohio are Stage I and Stage II controls required?

Stage I and II controls are required in Ohio's major metropolitan areas to help control ozone pollution. (See shaded areas of map below.)

Ohio Counties Requiring Stage I and Stage II Vapor Controls



Both Stage I and Stage II Controls Required:
 Air Permit (PTIO) or Permit-By-Rule (PBR) Registration Required

Stage I Controls Required:
 Air Permit (PTIO) or Permit-By-Rule (PBR) Registration Required

Does a GDF need an air pollution permit from Ohio EPA?

Regardless of location, if the maximum annual gasoline throughput of your GDF does not exceed 6,000 gallons, you do not need a permit from Ohio EPA.

An owner or operator of a GDF needs to obtain an air pollution permit or register for the permit-by-rule in the following situations:

1) If your GDF is located within one of these 24 Ohio counties, you need a permit or permit-by-rule registration:

- ◆ Ashtabula
- ◆ Butler
- ◆ Clark
- ◆ Clermont
- ◆ Cuyahoga
- ◆ Delaware
- ◆ Franklin
- ◆ Geauga
- ◆ Greene
- ◆ Hamilton
- ◆ Lake
- ◆ Licking
- ◆ Lorain
- ◆ Lucas
- ◆ Mahoning
- ◆ Medina
- ◆ Miami
- ◆ Montgomery
- ◆ Portage
- ◆ Stark
- ◆ Summit
- ◆ Trumbull
- ◆ Warren
- ◆ Wood

2) If your GDF is located outside of the above mentioned counties and your station does not have Stage I vapor controls, you need a permit.

A permit-to-install and operate (PTIO) or a permit-by-rule (PBR) registration is required before installing a gas station or before replacing tanks or vapor control equipment.

If you are already operating a GDF and did not get a permit when you first constructed, you still need to apply for either a PTIO or complete a PBR registration.

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What is the difference between a PTIO and a PBR registration?

A PTIO is a formal permit document that explains the installation and operating requirements for your GDF. It requires an application and typically takes up to two months to process. A PBR registration requires you to submit a simple, two-page notification form. By signing the form, you attest that your GDF meets the qualifying criteria and you agree to follow the operating requirements contained in the PBR instructions. Installation of the GDF can proceed once the PBR notification is submitted. However, only GDFs that meet certain design and annual gasoline throughput levels can qualify for the PBR.

A PTIO lasts for 10 years and can be renewed. An active PTIO can be transferred to a new owner. A PBR registration does not expire. However, a new owner of a station that previously operated under a PBR registration should complete a new PBR registration so all data about the station is current.

What are the fees for a PTIO or PBR registration?

The PTIO requires that you pay a \$100 initial fee for installation. This fee is doubled if the station installation is completed before the permit is issued. All stations that have a PTIO also are required to pay biennial emission fees ranging from \$100 to \$200 per year based on the level of emissions. The state does not charge installation or emission fees for the PBR registration, but your local air agency might assess fees for PBR registration and for witnessing equipment tests.

How do I get a PTIO or PBR registration?

Applying for a PTIO or PBR registration can be done through your local Ohio EPA district office or local air agency. You can find application forms and district office contact information online at www.epa.state.oh.us/dapc or by calling Ohio EPA's Office of Compliance Assistance and Pollution Prevention at (800) 329-7518.

What does my PTIO or PBR registration require me to do?

The PTIO or PBR registration tells you how to install, operate and maintain your vapor control equipment. It also requires you to keep records and notify Ohio EPA or your local office prior to conducting any tests on Stage II vapor control equipment.

Operators of Stage I systems must:

- use the system at all times during the transfer of gasoline;
- inspect and promptly repair equipment to ensure there are no leaking pressure/vacuum relief valves or leaks in vapor lines or liquid line connections;
- ensure all fill caps and hatch covers are closed during normal storage conditions; and
- keep records of annual throughput of gasoline and diesel/kerosene and used oil.

Operators of Stage II systems must:

- follow all requirements for Stage I systems above;
- have an employee trained in operating and maintaining the

Stage II control equipment [See the list of companies that provide training at www.epa.state.oh.us/ocapp/sb/stage2testinglist.pdf.];

- perform a static leak test and dynamic pressure test upon initial installation and a minimum of every five years thereafter;
- maintain the Stage II equipment in proper working order and use only CARB-certified replacement parts that are compatible with your system;
- perform any tests specified in, and at the frequency of, the applicable CARB Executive Order for the type of vapor control system installed. Generally, static leak tests and air to liquid ratio (A/L) tests are required annually (Your district office or testing company can advise you on the type and frequency of such tests); and
- report test results to the appropriate Ohio EPA district office or local air agency within 30 days. (Most testing companies perform this service, but you should confirm.)

Who will test my Stage II equipment?

If you have Stage II equipment, you must hire an independent testing company to perform the test. Staff from the Ohio EPA district office or local air agency will witness equipment tests, but not actually perform them. You or your testing company must notify the Ohio EPA district office or local air agency 30 days before the test date so an inspector can be present to witness the test. [See the list of testing companies at www.epa.state.oh.us/ocapp/sb/stage2testinglist.pdf.]

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What components of the vapor control system typically fail a test?

Any part of the vapor control system may fail, but the most common components that contribute to failing system tests are:

- pressure vacuum (PV) valves missing or inoperable;
- missing caps and/or damaged fittings on filling and vapor return lines;
- vacuum pumps (on vacuum-assist systems) leaking or not functioning;
- clogged fuel filters, restricting flow;
- crushed, crimped, or blocked nozzles or hoses; and
- replacement parts that are not CARB-certified and compatible with the Stage II system.

What about registering and testing my underground storage tanks?

Installing or removing underground storage tanks requires registration with the Bureau of Underground Storage Tank Regulation (BUSTR) within the State Fire Marshal's Office. In addition, BUSTR regulations require periodic tests of underground tanks and piping to ensure petroleum liquids are not contaminating soils and sources of drinking water. BUSTR requirements are in addition to the EPA requirements for Stage I and II systems. You may contact the BUSTR at (614) 752-8200 or visit their Web site at www.com.state.oh.us/sfm/bust/ to learn more about its requirements.

Where can I get help?

Contact your local Ohio EPA district office or local air agency for questions and notifications concerning the testing of Stage II equipment, permitting issues, CARB requirements, or other issues.

County where GDF is located	Local district office contact
Cuyahoga	Cleveland Department of Public Health, Division of Air Quality Penton Media Building, 4th Floor 1300 East 9th Street; Cleveland, Ohio 44114 (216) 664-2297
Ashtabula, Geauga, Lake, Lorain, Mahoning, Trumbull	Ohio EPA, Northeast District Office, Division of Air Pollution Control 2110 E. Aurora Rd.; Twinsburg, Ohio 44087 (330) 425-9171
Medina, Portage, Summit	Akron Regional Air Quality Management District 146 South High St. Room 904 Akron, Ohio 44308 (330) 375-2840
Stark	Canton City Health Department, Air Pollution Division 420 Market Ave. North Canton, Ohio 44702-1544 (330) 489-3385
Delaware, Franklin, Licking	Ohio EPA, Central District Office, Division of Air Pollution Control 50 West Town Street, Suite 700; Columbus, Ohio 43215 (614) 728-3778
Clark, Greene, Miami, Montgomery	Regional Air Pollution Control Agency 117 South Main St.; Dayton, Ohio 45422-1280 (937) 225-4435
Butler, Clermont, Hamilton, Warren	Department of Environmental Services, Air Quality Programs 250 William Howard Taft Road; Cincinnati, Ohio 45219-2660 (513) 946-7777
Lucas	Toledo Division of Environmental Services 348 South Erie Street; Toledo, Ohio 43604 (419) 936-3015
Wood	Ohio EPA, Northwest District Office, Division of Air Pollution Control 347 North Dunbridge Rd.; Bowling Green, Ohio 43402 (419) 352-8461

You also can contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) for help at (800) 329-7518 or by visiting www.epa.state.oh.us/ocapp/ocapp.html. OCAPP is an independent, non-regulatory office within Ohio EPA and we offer FREE assistance to small businesses that need help complying with the regulations. We also can help you with permit applications or other forms.

Additional online links to helpful information

PTIO application forms and instructions

www.epa.state.oh.us/dapc/permits/permits.html

Permit-by-Rule Notification Form and instructions

www.epa.state.oh.us/dapc/pbr/permitbyrule.html