STATE OF TENNESSEE
AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243

Permit to Construct or Modify an Air Contaminant Source Issued Pursuant to Tennessee Air Quality Act

Date Issued: December 16, 2014

Permit Number:
969436G

Date Expires: December 15, 2015

Issued To:
Speedway, LLC dba Speedway 7126

Installation Address:
2896 Paul Huff Parkway
Cleveland

Installation Description:
Gasoline Dispensing Facility
(Non-ISBMG, Stage I Vapor Recovery
Maximum Monthly Throughput ≥ 100k gal/month

Emission Source Reference No.
06-0309-01
NESHAP (Subpart CCCCCC)

The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations.

CONDITIONS:

1. The application that was utilized in the preparation of this permit is dated October 17, 2014 and is signed by Mr. Toby Rickabaugh, Env. Compliance Manager for the permitted facility. If this person terminates employment or is reassigned different duties and is no longer the responsible person to represent and bind the facility in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification shall be in writing and submitted within thirty (30) days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the facility in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

(conditions continued on next page)

Barry R. Stephens
TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

NON-TRANSFERABLE

POST AT INSTALLATION ADDRESS

2. The total stated maximum throughput of gasoline for this source is 4,200,000 gallons per calendar year. The total stated maximum monthly throughput of gasoline for this source is equal to or greater than 100,000 gallons per month. As defined in 40 CFR §63.11132, monthly throughput means the total volume of gasoline that is loaded into, or dispensed from, all gasoline storage tanks at each gasoline dispensing facility (GDF) during a month. Monthly throughput is 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, and then dividing that sum by 12. The permittee shall calculate and record the monthly throughput of gasoline in a log on each day of each month. Pursuant to 40 CFR §63.11117(d), the permittee shall have records available within 24 hours of a request by the Technical Secretary or his representative, to document monthly throughput at this facility. Monthly data, including all required calculations, must be entered in the log no later than thirty (30) days from the end of the month for which the data is required. This record must be retained for a period of not less than five years.

	Volume of gasoline loaded into, or dispensed from, all gasoline storage tanks during the current day, plus the total volume of gasoline loaded into, or dispensed from, all gasoline storage tanks during the previous 364 days (gallons/365 days)	Calculated Monthly Throughput of Gasoline (gallons/month)
January 1		
January 2		
January 3		
Etc.		
December 31		

Calendar Year 20___	Throughput of Gasoline (gallons per calendar year)
Total for January 1 to December 31	

3. Pursuant to 40 CFR §63.11111, this gasoline dispensing facility (GDF), located in Bradley County and exceeding the applicability threshold specified in 40 CFR §63.11111(d) shall be subject to all of the respective provisions of 40 CFR §63.11118 for facilities exceeding this applicability threshold and shall remain subject to these provisions even if throughput later falls below this threshold or if ownership of the facility is transferred.

4. Pursuant to 40 CFR §63.11115, the permittee shall comply with the requirements of paragraphs (a) and (b) of this condition.
   (a) The permittee shall, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Technical Secretary which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
   (b) The permittee shall keep applicable records and submit reports as specified in 40 CFR §63.11125(d) and §63.11126(b).

(conditions continued on next page)

5. Pursuant to 40 CFR §§63.11116(a) and 63.11118(a), 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:
   (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;
   (d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
   (e) Portable gasoline containers that meet the requirements of 40 CFR part 59, subpart F, are considered acceptable for compliance with paragraph (c) of this condition.

6. Pursuant to 40 CFR §63.11117(b), except as provided in paragraph (d) below, the permittee must only load gasoline into storage tanks at this facility by utilizing submerged filling. "Submerged filling" means, for the purposes of this permit, the filling of a gasoline storage tank through a submerged fill pipe whose discharge is no more than the applicable distance from the bottom of the tank, as specified in paragraphs (a), (b) and (c) below. Bottom filling of gasoline storage tanks is included in this definition.
   (a) Submerged fill pipes installed on or before November 9, 2006, must be no more than 12 inches from the bottom of the storage tank.
   (b) Submerged fill pipes installed after November 9, 2006, must be no more than 6 inches from the bottom of the storage tank.
   (c) Submerged fill pipes not meeting the specifications of paragraphs (a) or (b) of this condition are allowed if the owner or operator can demonstrate that the liquid level in the tank is always above the entire opening of the fill pipe. Documentation providing such demonstration must be made available for inspection by the Technical Secretary's delegated representative during the course of a site visit.
   (d) Gasoline storage tanks with a capacity of less than 250 gallons are not required to comply with the submerged fill requirements in this permit condition, but must comply only with all of the requirements in **Condition 5** of this permit.

7. Pursuant to 40 CFR §63.11118(b), except as provided in **Condition 8** of this permit, the permittee shall meet the requirements in either paragraph (1) or paragraph (2) of this condition.
   (1) Each management practice in **Table 1, located in Attachment 1**.
   (2) If, prior to January 10, 2008, the permittee satisfies the requirements in both paragraphs (i) and (ii) of this condition, the permittee will be deemed in compliance with this condition.
      (i) The permittee operates a vapor balance system at the GDF that meets the requirements of either paragraph (A) or paragraph (B) of this condition.
         (A) Achieves emissions reduction of at least 90 percent.
         (B) Operates using management practices at least as stringent as those in **Table 1, located in Attachment 1**.
      (ii) The permittee's gasoline dispensing facility is in compliance with an enforceable State rule or permit that contains requirements of either paragraph (A) or paragraph (B) of this condition.

8. Pursuant to 40 CFR §63.11118(c), the emission sources listed in paragraphs (1) through (3) of this condition are not required to comply with the control requirements in **Condition 7** of this permit, but must comply with the requirements in **Conditions 5 and 6** of this permit.
   (1) Gasoline storage tanks with a capacity of less than 250 gallons that are constructed after January 10, 2008.
   (2) Gasoline storage tanks with a capacity of less than 2,000 gallons that were constructed before January 10, 2008.
   (3) Gasoline storage tanks equipped with floating roofs, or the equivalent.

(conditions continued on next page)

9. Pursuant to 40 CFR §63.11118(d), cargo tanks unloading at this facility must comply with the management practices in **Table 2, located in Attachment 1** to this permit.

10. Pursuant to 40 CFR §63.11118(e), the permittee must comply with the applicable testing requirements contained in **Conditions 14 and 15**.

11. Pursuant to 40 CFR §63.11118(f), the permittee must submit the applicable notifications as required under **Condition 18**.

12. Pursuant to 40 CFR §63.11118(g), the permittee must keep records and submit reports as specified in **Conditions 19 through 24**.

13. Pursuant to 40 CFR §§63.11118(h) and 63.11113(a)(1), the permittee must comply with **Conditions 3 through 25** of this permit upon startup.

14. Pursuant to 40 CFR §63.11120(a), the permittee, at the time of installation of a vapor balance system required under **Condition 7**, and every 3 years thereafter, must comply with the requirements in paragraphs (1) and (2) below. For vapor balance systems installed after December 15, 2009, the permittee shall conduct an initial compliance test upon installation of the complete vapor balance system.
    (1) The permittee must demonstrate compliance with the leak rate and cracking pressure requirements, specified in item 1(g) of **Table 1, located in Attachment 1** to this permit, for pressure-vacuum vent valves installed on this source's gasoline storage tanks using the test methods identified in paragraph (i) or paragraph (ii) below.
        (i) 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, a copy of which is included as **Attachment 2** to this permit.
        (ii) Use alternative test methods and procedures in accordance with the alternative test method requirements in 40CFR §63.7(f).
    (2) The permittee must demonstrate compliance with the static pressure performance requirement, specified in item 1(h) of **Table 1, located in Attachment 1** to this permit, for this source's vapor balance system by conducting a static pressure test on this source's gasoline storage tanks using the test methods identified in paragraph (i), paragraph (ii), or paragraph (iii) below.
        (i) 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, a copy of which is included as **Attachment 3** to this permit.
        (ii) Use alternative test methods and procedures in accordance with the alternative test method requirements in §63.7(f).
        (iii) Bay Area Air Quality Management District Source Test Procedure ST-30-Static Pressure Integrity Test-Underground Storage Tanks, adopted November 30, 1983, and amended December 21, 1994.

(conditions continued on next page)

15. Pursuant to 40 CFR §63.11120(b), if the permittee chooses, under the provisions of 40 CFR §63.6(g), to use a vapor balance system other than that described in **Table 1, located in Attachment 1** to this permit, the permittee must demonstrate to the Technical Secretary, the equivalency of their vapor balance system to that described in **Table 1, located in Attachment 1** to this permit using the procedures specified in paragraphs (1) through (3) below.
    (1) The permittee must demonstrate initial compliance by conducting an initial performance test on the vapor balance system to demonstrate that the vapor balance system achieves 95 percent reduction 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, a copy of which is included as **Attachment 4** to this permit.
    (2) The permittee must, during the initial performance test required under paragraph (1) of this condition, determine and document alternative acceptable values for the leak rate and cracking pressure requirements specified in item 1(g) of **Table 1, located in Attachment 1** to this permit, and for the static pressure performance requirement in item 1(h) of **Table 1** to this permit.
    (3) The permittee must comply with the testing requirements specified in **Condition 14** of this permit.

16. Pursuant to 40 CFR §63.11120(c), performance tests conducted for 40 CFR 63, subpart CCCCCC shall be conducted under such conditions as the Technical Secretary specifies to the permittee based on representative performance (i.e., performance based on normal operating conditions) of the affected source. Upon request, the permittee shall make available to the Technical Secretary such records as may be necessary to determine the conditions of performance tests.

17. Pursuant to 40 CFR §63.11120(d), gasoline cargo tanks, owned or operated by the permittee, subject to the provisions of **Table 2, located in Attachment 1**, must conduct annual certification testing according to the vapor tightness testing requirements in 40 CFR §63.11092(f).

(conditions continued on next page)

18. Pursuant to 40 CFR §63.11124(b), the permittee must comply with paragraphs (1) through (5) of this condition, except that instead of notifying the Administrator, notices shall be provided to the Technical Secretary at the addresses specified in **Condition 28** of this permit.
    (1) The permittee must submit an Initial Notification that you are subject to this subpart by May 9, 2008, or at the time you become subject to the control requirements in 40 CFR §63.11118. The Initial Notification must contain the information specified in paragraphs (1)(i) through (iii) of this condition.
        (i) The name and address of the owner and the operator.
        (ii) The address (i.e., physical location) of the GDF.
        (iii) A statement that the notification is being submitted in response to 40 CFR 63, subpart CCCCCC and identifying the requirements in paragraphs (a) through (c) of 40 CFR §63.11118 that apply to the permittee.
    (2) The permittee must submit a Notification of Compliance Status to the Technical Secretary, in accordance with the schedule specified in 40 CFR §63.9(h). The Notification of Compliance Status must be signed by a responsible official who must certify its accuracy, must indicate whether the source has complied with the requirements of this subpart, and must indicate whether the facility's throughput is determined based on the volume of gasoline loaded into all storage tanks or on the volume of gasoline dispensed from all storage tanks. If the facility is in compliance with the requirements of 40 CFR 63, subpart CCCCCC at the time the Initial Notification required under paragraph (1) of this condition is due, the Notification of Compliance Status may be submitted in lieu of the Initial Notification provided it contains the information required under paragraph (1) of this condition.
    (3) If, prior to January 10, 2008, the permittee satisfies the requirements in both paragraphs (3)(i) and (ii) of this condition, the permittee is not required to submit an Initial Notification or a Notification of Compliance Status under paragraph (1) or paragraph (2) of this condition.
        (i) The permittee operates a vapor balance system at your gasoline dispensing facility that meets the requirements of either paragraphs (3)(i)(A) or (3)(i)(B) of this condition.
            (A) Achieves emissions reduction of at least 90 percent.
            (B) Operates using management practices at least as stringent as those in Table 1 to this subpart.
        (ii) Your gasoline dispensing facility is in compliance with an enforceable State, local, or tribal rule or permit that contains requirements of either paragraphs (3)(i)(A) or (3)(i)(B) of this condition.
    (4) The permittee must submit a Notification of Performance Test, as specified in 40 CFR §63.9(e), prior to initiating testing required by §63.11120(a) and (b).
    (5) The permittee must submit additional notifications specified in 40 CFR §63.9, as applicable.

19. Pursuant to 40 CFR §63.11125(a), the permittee must keep records of all tests performed under **Conditions 14 and 15**.

20. Pursuant to 40 CFR §63.11125(b), the permittee shall keep records required under **Condition 19** of this permit for a period of 5 years and shall make these records available for inspection by the Technical Secretary or his representative(s) during the course of a site visit.

(conditions continued on next page)

21. Pursuant to 40 CFR §63.11125(c), each gasoline cargo tank subject to the management practices in **Table 2, located in Attachment 1** must keep records documenting vapor tightness testing for a period of 5 years. Documentation must include each of the items specified in 40 CFR §63.11094(b)(2)(i) through (viii). Records of vapor tightness testing must be retained as specified in either paragraph (1) or paragraph (2) of this condition.

    (1) The owner or operator must keep all vapor tightness testing records with the cargo tank.
    (2) As an alternative to keeping all records with the cargo tank, the permittee may comply with the requirements of paragraphs (2)(i) and (ii) of this condition.
        (i) The permittee may keep records of only the most recent vapor tightness test with the cargo tank, and keep records for the previous 4 years at their office or another central location.
        (ii) Vapor tightness testing records that are kept at a location other than with the cargo tank must be instantly available (e.g., via e-mail or facsimile) to the Technical Secretary's delegated representative during the course of a site visit or within a mutually agreeable time frame. Such records must be an exact duplicate image of the original paper copy record with certifying signatures.

22. Pursuant to 40 CFR §63.11125(d), the permittee shall keep records as specified in paragraphs (1) and (2) of this condition.
    (1) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
    (2) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR §63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

23. Pursuant to 40 CFR §63.11126(a), the permittee shall report to the Technical Secretary the results of all volumetric efficiency tests required under **Condition 15**. Reports submitted under this condition must be submitted within 180 days of the completion of the performance testing.

24. Pursuant to 40 CFR §63.11126(b), the permittee shall report to the Technical Secretary , by March 15 of each year, the number, duration, and a brief description of each type of malfunction which occurred during the previous calendar year and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions in accordance with 40 CFR §63.11115(a), including actions taken to correct a malfunction. No report is necessary for a calendar year in which no malfunctions occurred.

25. Pursuant to 40 CFR §63.11130, **Table 3, located in Attachment 1** to this permit, shows which parts of the General Provisions (40 CFR part 63, subpart A) apply to the permittee.

26. This source shall comply with all applicable state and federal air pollution regulations. This includes, but is not limited to, federal regulations published under 40 CFR 63 for sources of hazardous air pollutants and 40 CFR 60, New Source Performance Standards. TAPCR 1200-03-09-.03(8).

27. This source shall operate in accordance with the terms of this permit and the information submitted in the approved permit application. TAPCR 1200-03-09-.02(6).

28. This permit is valid only at this location. TAPCR 1200-03-09-.03(6).

29. This permit shall serve as a temporary operating permit from initial start-up to the receipt of a standard operating permit (regardless of the expiration date), provided the operating permit is applied for within thirty (30) days of initial start-up and the conditions of this permit and any applicable emission standards are met. TAPCR 1200-03-09-.02(3)(b).

(conditions continued on next page)

30. The permittee shall certify the initial start-up date of the air contaminant source regulated by this permit by submitting

A COPY OF ALL PAGES OF THIS PERMIT,

with the information required in A) and B) of this condition completed, to the Technical Secretary's representatives listed below:

A) DATE OF INITIAL START-UP: _____ / ____ / _____
month day year

B) Anticipated operating rate: ____ percent of maximum rated capacity

For the purpose of complying with this condition, "initial start-up" of the air contaminant source shall be the date of the setting in operation of the source for the sale of gasoline.

The undersigned represents that he/she has the full authority to represent and bind the permittee in environmental permitting affairs. The undersigned further represents that the above provided information is true to the best of his/her knowledge and belief.

Signature		Date
Signer's name (type or print)	Title	Phone (with area code)

Note: This certification is not an application for an operating permit. At a minimum, the appropriate application form(s) must be submitted requesting an operating permit. The application must be submitted in accordance with the requirements of this permit.

The completed certification shall be mailed to the Permit Program at the address listed below, no later than thirty (30) days after the air contaminant source is started-up.

Division of Air Pollution Control
East Tennessee Permit Program
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243

Or submit an electronic copy (PDF) of the start-up certification by email to: Air.Pollution.Control@tn.gov

As an alternative to submittal of paper copies, the electronically-submitted start-up certification must comply with the specified deadlines as required for a paper copy submittal. A color copy of the document with blue ink signatures is preferred, but a black- and –white submittal is acceptable. The Air Pollution Control e-mail address will send an automatic reply to verify that the electronic submittal was received. If an automatic reply is not received, you may wish to re-send or confirm that the e-mail submittal was received by contacting the Division of Air Pollution Control at (615) 532-0554.

TAPCR 1200-03-09-.02(3)(b)

(end of conditions)

Attachments 1 - 6 on Smog Log

Following the permit, this note addresses copies for the Environmental Field Office, APC Numeric & Company files

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As an effort to reduce cost and file space, please see all attachments 1-6 (including tables) on SMOG LOG. Contact Environmental Protection Specialist for a hard copy. Thanks for your help!

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
WILLIAM R. SNODGRASS TENNESSEE TOWER
312 ROSA L. PARKS AVENUE, 15th FLOOR
NASHVILLE, TN 37243

December 16, 2014

Mr. Toby Rickabaugh, Env. Compliance Manager
Speedway LLC dba Speedway # 7126
500 Speedway Drive
Enon, OH 45323

Re: Issuance of Construction Permit
Speedway # 7126
2896 Paul Huff Parkway, Cleveland, Tennessee
06-0309-01, 969436G

Dear Mr. Rickabaugh:

Please find enclosed Construction Permit # 969436G for the gasoline dispensing facility located at 2896 Paul Huff Parkway, Cleveland, Tennessee. It is important that you read and understand the permit.

If you have any questions concerning this correspondence, please contact Mrs. Sarosh Kaiser at (615) 532-0585 or Sarosh.Kaiser@tn.gov.

Sincerely,

Steven Simpson, Section Manager
East Tennessee Permit Program