

INITIAL NOTIFICATION AND NOTIFICATION OF COMPLIANCE STATUS FOR GASOLINE DISPENSING FACILITIES (GDFs)

NESHAP

40 CFR, Part 63, Subpart CCCCCC (Sections 63.11110 – 63.11132)

Instructions

1. Who Must Provide Notification?

On January 10, 2008, the U.S. Environmental Protection Agency (U.S. EPA) finalized a National Emission Standard for Hazardous Air Pollutants (NESHAP) for gasoline dispensing facilities (GDFs). This standard, referred to as the NESHAP, requires certain GDFs to provide notifications to the U.S. EPA. Those notifications are explained below.

The need to file the “*Initial Notification*” and the “*Notification of Compliance Status*” is largely based upon the monthly gasoline throughput of your GDF.

Who Does Not Notify:

- ✓ If your GDF’s monthly gasoline throughput is less than 10,000 gallons per month, notifications are not required.
- ✓ If your GDF’s monthly gasoline throughput is 10,000 gallons or more and less than 100,000 gallons, startup of your GDF occurred before January 10, 2008, and your GDF gasoline tanks are equipped with submerged fill pipes that are within 6 inches of the bottom of the tank, notifications are not required.
- ✓ If your GDF’s monthly gasoline throughput is 100,000 gallons or more and you have been complying with a state vapor balance system requirement before January 10, 2008, notifications are not required.

Who Does Notify:

- ✓ If your GDF’s monthly gasoline throughput is 10,000 gallons or more and less than 100,000 gallons, and startup occurred on or after January 10, 2008, notifications are required.
- ✓ If your GDF’s monthly gasoline throughput is 10,000 gallons or more and less than 100,000 gallons, startup of your GDF occurred before January 10, 2008, and your GDF gasoline tanks are not equipped with submerged fill pipes that are within 6 inches of the bottom of the tank, notifications are required.
- ✓ If your GDF’s monthly gasoline throughput is 100,000 gallons or more and you are not subject to a state vapor balance system requirement, notifications are required.
- ✓ If your GDF’s monthly gasoline throughput is 100,000 gallons or more and you began complying with a state vapor balance system requirement on or after January 10, 2008, notifications are required.

2. Definitions

Area source – any stationary source that has the potential to emit less than 10 tons per year of a single hazardous air pollutant (HAP) and less than 25 tons per year of any combination of HAPs.

Dual-point vapor balance system - a type of vapor balance system in which the storage tank is equipped with an entry port for a gasoline fill pipe and a separate exit port for a vapor connection.

Existing source – an area source that started construction of the gasoline dispensing facility on or before November 9, 2006.

Gasoline - any petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 4 psi (pounds per square inch of pressure) or greater which is used as a fuel for internal combustion engines.

Gasoline cargo tank - a delivery tanker truck or railcar which is loading gasoline or which has loaded gasoline on the immediately previous load.

Gasoline dispensing facility (GDF) - is any stationary facility dispensing gasoline into the fuel tank of a motor vehicle, motor vehicle engine, non-road vehicle, or non-road engine, including a non-road vehicle or non-road engine used solely for competition. This includes, but is not limited to, retail gasoline stations and many fleet vehicle refueling centers, facilities that dispense gasoline into on- and off-road, street, or highway motor vehicles, lawn equipment, boats, test engines, landscaping equipment, generators, pumps and other gasoline-fueled engines and equipment.

Major source – any stationary source or group of stationary sources located within a contiguous area and under common control that emits, or has the potential to emit, considering controls, 10 tons per year (tpy) or more of any single HAP, or 25 tpy or more of any combination of HAPs.

Monthly throughput – the total volume of gasoline that is loaded into or dispensed from all gasoline storage tanks at each GDF during the current day, plus the previous 364 days, and then dividing that sum by 12.

Motor vehicle – any self-propelled vehicle designed for transporting persons or property on a street or highway.

New source – an area source that started construction of the gasoline dispensing facility after November 9, 2006.

Reconstructed Source - an area source that started construction of the gasoline dispensing facility on or prior to November 9, 2006, and modifications (i.e., the fixed capital costs associated with the changes to the gasoline storage tanks and associated piping exceeded 50 percent of the fixed capital cost that would be required to construct a comparable new storage tank system) occurred after November 9, 2006.

Submerged filling - for the purpose of this rule, the filling of a gasoline storage tank through a submerged fill pipe whose discharge is no more than six inches from the bottom of the tank. Bottom filling of gasoline storage tanks is included in this definition.

Vapor balance system - a combination of pipes and hoses that create a closed system between the vapor spaces of an unloading gasoline cargo tank and a receiving storage tank such that vapors displaced from the storage tank are transferred to the gasoline cargo tank being unloaded.

Vapor-tight - equipment that allows no loss of vapors. Compliance with vapor-tight requirements can be determined by checking to ensure that the concentration at a potential leak source is not equal to or greater than 100 percent of the Lower Explosive Limit when measured with a combustible gas detector, calibrated with propane, at a distance of one inch from the source.

3. How Do I Complete the Initial Notification and Notification of Compliance Form?

This form is a combined form that can be used to satisfy the following two requirements:

1. Initial Notification: informing the U.S. EPA that the GDF is subject to the NESHAP.
2. Notification of Compliance Status: informing the U.S. EPA of the GDF's compliance with the requirements contained within the NESHAP.

The "**Facility Information**" section of the form must be filled out completely each time the form is submitted.

Part A - Applicability and Compliance Status consists of a table that summarizes the Subpart CCCCC requirements based on the GDF's monthly gasoline throughput. For GDFs submitting an Initial Notification, please check the applicable requirements in the far left column. For GDFs submitting a Notification of Compliance Status, please initial the requirements you are currently in compliance with in the far right column.

Part B – Compliance Certification must be filled out completely each time the form is submitted.

4. When Must the Notification Forms Be Submitted?

Existing sources fueling *into motor vehicles* were supposed to submit their Initial Notification by May 9, 2008 and the Notification of Compliance Status by January 10, 2011. If the Initial Notification deadline was missed, the form should still be submitted. You can certify that your source is in compliance with all of the relevant requirements of Subpart CCCCCC at the time of your Initial Notification submittal (i.e., you check box B.1 (a) on page 3, and initial the requirements you are complying with in the far right column of the table in Part A. If you check box B.1 (b), then you have until January 10, 2011 to submit the Notification of Compliance Status to U.S. EPA certifying your compliance with Subpart CCCCCC. **Existing sources** that *only load gasoline into tanks other than motor vehicles* must submit their Initial Notification by May 24, 2011.

The deadlines for all **new sources** to be in compliance with the NESHAP have passed. Essentially new sources needed to be in compliance with the NESHAP by 2008 or upon startup, whichever is later. The Initial Notification and Notification of Compliance Status must be submitted upon startup of the GDF. New sources that are in full compliance with the relevant requirements of Subpart CCCCCC would check box B.1 (a). If your new source is not in compliance with Subpart CCCCCC, you would check box B.1 (c) and explain what your compliance issues are and what you will be doing to achieve compliance. Once your new source's compliance status has changed to compliant, then you would submit an updated Notification of Compliance Status to the U.S. EPA. Contact the Environmental Assistance Program at (800) 662-9278 for more information.

5. Where Do I Send The Completed Form?

Please make a copy of this form and submit the original signed copy by U.S. mail, or by another courier, to the U.S. EPA Region 5 Office at the following address:

U.S. EPA Region 5,
Compliance Tracker (AE-17J)
77 West Jackson Blvd.
Chicago, IL 60604

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Please review the Instructions before completing this form. Please print or type all information.

Identify Notification Type (*please check one or both*)

- Initial Notification
 Notification of Compliance Status

FACILITY INFORMATION

Company Information

Company Name: _____ Telephone _____
 Mailing Address: _____ Number: _____
 _____ Fax Number: _____
 City: _____ State: _____ Zip: _____

Owner/Operator Information

Name and Title: _____ Telephone _____
 Mailing Address: _____ Number: _____
 _____ E-mail: _____
 City: _____ State: _____ Zip: _____

Please check whether the person listed above is owner or operator of the GDF: Owner Operator

Facility Location Information (If different from Company Information)

Company Name: _____
 Street Address: _____ County: _____
 City: _____ State: _____ Zip: _____

Please check your GDF source type:
 (*Refer to Instructions for definitions*)

- New Source (Date of Startup: _____)
 Existing Source (*check box that applies below*)
 Load gasoline into motor vehicles **OR**
 Load gasoline into only tanks other than motor vehicles
 Reconstructed Source
 (Date of Reconstruction _____)

Please check how you calculate the GDF Monthly Throughput:
 (*Refer to Instructions for definitions*)

- Gasoline *loaded* into all GDF storage tanks
 Gasoline *dispensed* from all GDF storage tanks

Gasoline Storage Tank Information

Identify the capacity and installation date of each gasoline storage tank at the above location.

Gasoline Tank ID	Capacity (gallons)	Date of Tank Installation	Type of Vapor Balance System on Tank
			<input type="checkbox"/> Dual Pt. <input type="checkbox"/> Coaxial <input type="checkbox"/> Manifold <input type="checkbox"/> None
			<input type="checkbox"/> Dual Pt. <input type="checkbox"/> Coaxial <input type="checkbox"/> Manifold <input type="checkbox"/> None
			<input type="checkbox"/> Dual Pt. <input type="checkbox"/> Coaxial <input type="checkbox"/> Manifold <input type="checkbox"/> None

PART A - APPLICABILITY AND COMPLIANCE STATUS

For GDFs submitting an Initial Notification, please check (√) the applicable requirements in the far left column. For GDFs submitting a Notification of Compliance Status, please initial the requirements you are currently in compliance with in the right column.

Initial Notification ¹ (√)	Monthly Gasoline Throughput (gallons)	Requirements/Conditions (Must be in compliance by 1/10/2011 for existing GDFs, and upon startup for new GDFs)	Compliance Status ¹ (Initials)
	Less than 10,000	1. Minimize spills. 2. Clean up spills expeditiously. 3. Cover gasoline containers & storage tank fill pipes with gasketed seal. 4. Minimize gasoline sent to open collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.	
	10,000 or more and less than 100,000 and startup of GDF occurred <i>before</i> January 10, 2008.	All of the above plus: 5. Install submerged fill pipes no more than 12 inches from the tank bottom if installed on or before November 9, 2006, or 6 inches from the tank bottom if installed after November 9, 2006. (Note: All Michigan GDFs should already be in compliance with Condition 5 because DNRE rules require submerged filling with a discharge that is no more than six inches from the bottom of the storage tank.)	
<input type="checkbox"/>	10,000 or more and less than 100,000 and either startup of GDF occurred <i>on or after</i> January 10, 2008, or startup occurred before January 10, 2008, but not operating in compliance with submerged fill requirements as of January 10, 2008.	Conditions 1,2,3,4 and 5 above.	_____
<input type="checkbox"/>	100,000 or more and either startup of the GDF occurred on or after January 10, 2008, or startup occurred before January 10, 2008, but not subject to a state rule requiring vapor balance systems.	Conditions 1, 2, 3, 4, 5 above plus 7 or 8 below. NOTE: Condition 6 is a GDF that is subject to and has been complying with a state vapor balance rule prior to January 10, 2008. These GDFs are not required to submit notifications. GDFs subject to and complying with a state vapor balance rule on or after January 10, 2008, must comply with either Condition 7 or 8, and must comply with the notification requirements. 7. Install and operate a vapor balance system according to all of the following management practices. a) All vapor connections and lines on the storage tank shall be equipped with closures that seal upon disconnect. b) The vapor line from the storage tank to tanker truck shall be vapor-tight which is defined as no loss of vapors. c) The vapor balance system shall be designed such that the pressure in the tanker truck does not exceed 18 inches of water pressure or 5.9 inches water vacuum during product transfer.	_____ _____ _____

¹ If area is shaded and you are operating in compliance with the requirements, then an Initial Notification and Notification of Compliance Status does not have to be submitted.

PART B – COMPLIANCE CERTIFICATION

B.1 Compliance Certification Statement

I certify the truth and accuracy and completeness of this notification and (*Please check one of the following three statements*):

- (a) The source is operating in compliance with all of the applicable requirements of Subpart CCCCCC.
- (b) The source is an existing source that only loads gasoline into tanks other than motor vehicles and will be in compliance with the relevant requirements by January 24, 2014.
- (c) The source is a new source and is not operating in compliance with Subpart CCCCCC. The following is an explanation of the noncompliance and details of the corrective actions being taken to achieve compliance.

Certifying Official: Owner Operator (check one)

Name of Certifying Official (print or type) Title

Signature of Certifying Official Date

Please make a copy of this Initial Notification and Notification of Compliance Status form and submit the original signed copy by U.S. mail, or by another courier, to U.S. EPA Region 5 Office at the following address:

U.S. EPA Region 5,
Compliance Tracker (AE-17J)
77 West Jackson Blvd.
Chicago, IL 60604