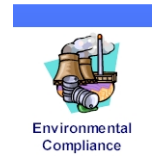




BULK GASOLINE PLANTS



COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) COMPLAINT/DISCOVERY (CI)
 RE-INSPECTION (FUI) ARMS COMPLAINT NO: _____

| | | |
|--|---|--|
| FACILITY: Lancaster Oil of Pinellas, Inc. | | DISTRICT: |
| DBA/Site Name: | | Southwest |
| ADDRESS: 701 43 rd Street St. Petersburg, Florida | | CONTACT PHONE: 727-327- 4661 |
| ARMS NO: 1030523 | PERMIT NO: 1030523-001-AG | Expiration Date: 11/26/12 Renewal Date: 10/26/12 Test Date: |

EMISSION UNIT DESCRIPTION: Bulk Plant consisting of one 6K & one 20K gallon bottom loading gasoline tanks with loading rack (submerged filling required). Also, a diesel loading rack with three 20K gallon diesel tanks (ULS, LSD, & HSD); Two 5K gallon oil tanks & 4K Kerosene

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| INSPECTION DATE: 5/11/09 | INSPECTION COMPLIANCE STATUS (<i>check <input type="checkbox"/> only one box</i>) <input type="checkbox"/> In Compliance; <input type="checkbox"/> Minor Non-Compliance; <input checked="" type="checkbox"/> Significant Non-Compliance |
|------------------------------------|---|

PART I: General Review:

| | | |
|--|---|---|
| 1. | Permit File Review | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. | Introduction and Entry | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <i>Comments: This inspection was performed in order to determine if this facility has been operating within applicable regulations. Mr. Bill Smith (Manager) was present during the facility inspection of the emission unit. He stated he took over operation as manager in September 2008. He stated Mr. Robert Blair the previous manager no longer with company.</i> | | |
| 3. | Is the Authorized Representative still: Robert O. Blair? <i>Comments: Mr. Smith stated Mr. Blair the previous Authorized Representative had resigned from their company. Mr. Smith stated is the Authorized Representative of the company as of September 2008.</i> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 4. | Is the facility contact still: Shane Freese? <i>Comments: Mr. Smith stated Mr. Blair the previous facility contact had resigned from their company. Mr. Smith stated is the facility contact of the company as of September 2008.</i> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 5. | If the answer to 3 or 4 is "No", did the facility provide an administrative update within 30 days? [62-210.310(2)(d), F.A.C.] | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

PART II: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-210.310(4)(d), F.A.C. (check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

| | |
|--|---|
| 1. Is the facility using any other general permits at this location? ----- [62-210.310(4)(a)1.a., F.A.C.] | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 2. Is the facility subject to any unit-specific applicable requirement other than any applicable provisions of Rule 62-296.418, F.A.C.? ----- [62-210.310(4)(d)1b., F.A.C.] | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 3. Does the facility operate any other emission unit that is not exempt from permitting pursuant to subsection 62-210.300(3), F.A.C., or Rule 62-4.040, F.A.C.? ----- [62-210.310(2)a., F.A.C.] | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N |
| 4. Does the facility only receive and distribute petroleum-based lubricants, gasoline, diesel fuel, mineral spirits | |

PART II: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-210.310(4)(d), F.A.C.
(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

and kerosene? -----

Yes No

5. Is the total storage capacity for gasoline at the facility 150,000 gallons or less? -----
[62-210.310(4)(a)2.b., F.A.C.]

Yes No

Total gasoline storage capacity is **26000 gallons** in two tanks, one tank with **6000 gallons** capacity and the other has **20,000 gallons**.

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| 6. In any consecutive twelve (12) month period, does the facility throughput rate (receive and distribute) exceed 6.0 million gallons of gasoline? ----- [62-210.310(4)(a)2.c., F.A.C.] The highest consecutive 12-month total was _____ gallons recorded for the month of _____.(month, year). | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 7. Is the facility maintaining records to document the throughput rate (receive and distribute) of gasoline on a monthly basis? ----- [62-210.310(4)(a)2.d., F.A.C.] | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 8. Are the records available for Department inspection and available for a period of at least five (5) years or to the beginning of operation? ----- [62-210.310(4)(a)2.d., F.A.C.] | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 9. Do the records list the consecutive twelve (12) month throughput rate totals? ----- [62-210.310(4)(a)2.d., F.A.C.] | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Note: Facility failed to maintain highest consecutive twelve (12) month period gasoline throughput rate. | |

PART III: Performance Standards for Existing RACT Bulk Gasoline Plants – Rule 62-296.418, F.A.C.
(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

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|--|--|
| 1. Applicability - If all the answers to 1a. – 1.c. are yes, the facility is an existing RACT facility. Is the facility an existing RACT Bulk Plant? If the answer is <u>No</u> , skip questions 2 – 5 and go to Section IV ----- a. Did the bulk gasoline plant begin operation prior to August 1, 2007? ----- b. Is the facility located in an area designated as a nonattainment area or air quality maintenance area for ozone under Rule 62-204.340, F.A.C.? ----- c. Is the average annual daily throughput* more than 2,000 gallons and less than 20,000 gallons? ----- * calculated on the basis of the number of calendar days that the facility receives or distributes gasoline [62-296.418(1), F.A.C.] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Are the stationary storage tanks equipped for submerged* filling?----- * filling through an internal fill pipe whose discharge is no more than six (6) inches from the bottom of the tank. Bottom filling of gasoline cargo tanks or stationary storage tanks is included in this definition. [62-296.418(1)(a), F.A.C.] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Is the stationary storage tanks submerged filling equipment used as designed? ----- The submerge filling operation was a) <input type="checkbox"/> Not observe; b) <input checked="" type="checkbox"/> Observed [62-296.418(1)(a), F.A.C.] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Is gasoline only loaded into a gasoline cargo tank(s) (truck) that are equipped for submerged filling?, and such equipment is used as designed.? ----- [62-296.418(1)(b), F.A.C.] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 5. Is the gasoline cargo tank(s) submerged filling equipment used as designed. ----- The submerge filling operation was a) <input type="checkbox"/> Not observe; b) <input checked="" type="checkbox"/> Observed [62-296.418(1)(b), F.A.C.] | <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

PART IV: Performance Standards for New RACT Bulk Gasoline Plants – Rule 62-296.418, F.A.C.
(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

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|--|---|
| 1. Applicability - If all the answers to 1a. – 1.b. are yes, the facility is a new RACT facility. Is the facility an existing RACT Bulk Plant? ----- a. Did the bulk gasoline plant begin operation on or after August 1, 2007, at any location in the state and with any throughput rate shall comply with the following requirements? ----- b. Is the average annual daily throughput* less than 20,000 gallons? ----- * calculated on the basis of the number of calendar days that the facility receives or distributes gasoline 62-296.418(2), F.A.C.] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
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| | |
|--|---|
| 1. Are the stationary storage tanks equipped for submerged filling*?----- * filling through an internal fill pipe whose discharge is no more than six (6) inches from the bottom of the tank. Bottom filling of gasoline cargo tanks or stationary storage tanks is included in this definition. [62-296.418(2)(a), F.A.C.] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Is the stationary storage tanks submerged filling equipment used as designed? ----- The submerge filling operation was a) <input type="checkbox"/> Not observe; b) <input checked="" type="checkbox"/> Observed [62-296.418(2)(a), F.A.C.] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Is gasoline only loaded into a gasoline cargo tank(s) (truck) that are equipped for submerged filling?, and such equipment is used as designed.? ----- [62-296.418(2)(b)1., F.A.C.] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> N |
| 4. Is the gasoline cargo tank(s) submerged filling equipments used as designed. ----- The submerge filling operation was a) <input type="checkbox"/> Not observe; b) <input checked="" type="checkbox"/> Observed [62-296.418(2)(b)1, F.A.C.] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 5. Is the loading rack is equipped with a vapor collection and control system designed to minimize emissions of vapors displaced from the gasoline cargo tank during product loading? ----- [62-296.418(2)(b)2., F.A.C.] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 6. Is the loading rack vapor collection and control system is designed and operated to prevent any vapors collected at the loading rack from passing to another loading rack? ----- [62-296.418(2)(b)3., F.A.C.] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

PART V: Special Conditions And Procedures
(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

Administrative Changes:

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| 1. Were there any change in the name, address, or phone number of the facility or authorized representative not associated with a change in ownership or with a physical relocation of the facility or any emissions units or operations comprising the facility; or any other similar minor administrative change at the facility? ----- [62-210.310(2)(d), F.A.C.] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Did the facility provide written notification within 30 days of the administrative change?----- [62-210.310(2)(d), F.A.C.] | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA |

Permit Effective Period

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|--|---|
| 3. Is the general permit for this facility still within the 5 year effective period? ----- | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Did the facility submit the new re-registration form at least 30 days prior to permit expiration? ----- [62-210.310(3)(a), F.A.C.] | <input type="checkbox"/> Yes <input type="checkbox"/> No |

New or Modified Process Equipment / Change in Ownership

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| 5. Since the last registration form submittal has there been [62-210.310 (2)(b)2, F.A.C] | |
| a) Installation of any new process equipment? - ----- | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| b) Alterations to existing process equipment without replacement? ----- | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| c) Replacement of existing equipment with equipment that is substantially different? ----- | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| d) A change in ownership? ----- | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| If any of the answers to 1a) – 1)d) are Yes , a new registration form and appropriate fee should have been submitted 30 days prior to the change. Was a new registration form properly submitted? | <input type="checkbox"/> Yes <input type="checkbox"/> No |

Noncompliance Notice: - [62-210.310(3)(i), F.A.C.]

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| 6. Did the facility have any instances where they were unable comply with or will be unable to comply with any condition or limitation of the air general permit? ----- If the answer is Yes , proceed to a) and b). | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| a) Did the owner or operator provide immediate notification to the Department? ----- | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| b) Did the notification include: | |
| 1. A description of and cause of noncompliance?----- | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 2. The period of noncompliance, including dates and times; or if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance? ----- | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

PART V: Special Conditions And Procedures
 (check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

Maintenance:

- | | |
|---|---|
| 7. Does the owner or operator maintain the permitted facility, emission unit, or activity in good condition? ----- [62-210.310(3)(g), F.A.C.] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 8. Does the owner or operator make every reasonable effort to conduct the specific activity authorized by the general permit in a manner that minimizes adverse effects on adjacent property or on public use of the adjacent property, where applicable, and on the environment, including fish, wildlife, natural resources, water quality, or air quality? ----- [62-210.310(3)(g), F.A.C.] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

PART IV: Comments – List comments that provide detail to any violations or clarifies the inspection

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| Part II: # 6 [62-210.310(4)(a)2.c., F.A.C.] - |
| Facility failed to maintain highest consecutive twelve (12) month period gasoline throughput rate. |
| Part II: # 7 [62-210.310(4)(a)2.d., F.A.C.] - |
| Facility failed to maintain records to document the throughput rate (receive and distribute) of gasoline on a monthly basis for July 2008, August 2008, September 2008, October 2008, November 2008, December 2008, January 2009, February 2009 and March 2009, April 2009. |
| Part V:# 2 [62-210.310(2)(d), F.A.C.] - |
| Facility failed to provide written notification within 30 days of the administrative change. |
| Mr. Bill Smith stated he took over operation as manager in September 2008. He stated Mr. Robert Blair the previous manager no longer with company. I asked Mr. Smith as to why he failed to maintain records to document the throughput rate (receive and distribute) of gasoline on a monthly basis. He stated he was not aware that Lancaster Oil of Pinellas Incorporated was required by rules to maintain records to document the throughput rate. I explained to Mr. Smith that Lancaster Oil of Pinellas Incorporated had a General Permit that required the facility to maintain records to document the throughput rate. Mr. Smith then search for copy of the General Permit requirements in the folder inside their office. I Showed Mr. Smith the rules requirements. I told him they needed to maintain records to document the throughput rate. Mr. Smith stated he would review the rules and document the facility gasoline throughput rate. He said he would fax a copy of throughput rate record to AQ Division office later. See attached copy of throughput rate that was faxed to AQ Division office. The attached copy of throughput rate did not include the monthly documentation of the throughput rate. I told Mr. Smith this was a violation and there was a possibility of penalties. |
| . |

 Mike Ojo Thomas

 5/11/2009

 Inspector's Name

 Date of Inspection

 Inspector's Signature

 Approximate Date of Next Inspection

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