May 9, 2023

Ms. Theresa M. Impastato

Executive V.P. and Chief Safety Officer

WMATA/SAFE

3500 Pennsy Drive, Suite C-172

Landover, MD 20785

**RE: Permit No. 7342 to Construct and Operate a Gasoline Dispensing System and Associated Storage Tank** **at the Washington Metropolitan Area Transit Authority (WMATA) Bladensburg Bus Facility, 2250 26th Street NE Washington DC**

Dear Ms. Impastato:

Pursuant to sections 200.1 and 200.2 of Title 20 of the District of Columbia Municipal Regulations (20 DCMR), a permit from the Department of Energy and Environment (“the Department”) shall be obtained before any person can operate a stationary source in the District of Columbia. The application of the Washington Metropolitan Area Transit Authority (WMATA) (“the Permittee”) to install and operate a gasoline dispensing system and associated 12,000-gallon capacity underground storage tank at the WMATA Bladensburg Bus Facility, 2250 26th Street NE Washington DC, has been reviewed.

Based on the submitted plans and specifications as detailed in the application received November 10, 2022, the application is hereby approved, and the construction and operation of the gasoline dispensing system and associated tank is permitted, subject to the following conditions:

**I.** **General Requirements:**

1. The gasoline dispensing system and associated tank shall be constructed and operated in accordance with the air pollution control requirements of 20 DCMR.

b. This permit will expire on May 8, 2028. [20 DCMR 200.4]. If continued operation after this date is desired, the Permittee shall submit an application for renewal by February 8, 2028.

c. Construction or operation of equipment under the authority of this permit shall be considered acceptance of its terms and conditions.

1. The Permittee shall allow authorized officials of the District, upon presentation of identification, to:

1. Enter upon the Permittee’s premises where a source or emission unit is located, an emissions related activity is conducted, or where records required by this permit are kept;

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of this permit;

3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

4. Sample or monitor, at reasonable times, any substance or parameter for the purpose of assuring compliance with this permit or any applicable requirement.

1. This permit shall be kept on the premises and produced upon request.
2. Failure to comply with the provisions of this permit may be grounds for suspension or revocation. [20 DCMR 202.2]

**II. Gasoline Storage Tank**

The 12,000-gallon gasoline underground storage tank and related delivery operations, shall comply with the following requirements:

a. Emission Limitations:

1. Visible emissions shall not be emitted into the outdoor atmosphere from the gasoline storage tank. [20 DCMR 201 and 20 DCMR 606.1]

2. An emission into the atmosphere of odorous or other air pollutants from any source in any quantity and of any characteristic, and duration which is, or is likely to be injurious to the public health or welfare, or which interferes with the reasonable enjoyment of life or property is prohibited. [20 DCMR 903.1]

* 1. b. Operational Limitations:
1. The Permittee must equip the storage tank with a Stage I Vapor Recovery System (VRS) which shall remain operative and effective whenever gasoline is being transferred into the tank [20 DCMR 101.1 and 20 DCMR 704].
2. The transfer of gasoline from the delivery vessel into the stationary storage container shall occur only if the container is equipped with a submerged fill pipe (no more than six inches from the bottom of the tank) and the displaced vapors from the storage container are processed by a system that prevents release to the atmosphere of no less than ninety percent (90%) by weight of organic compounds in the vapor displaced from the stationary container location. [20 DCMR 704.1]
3. The vapor recovery portion of the Stage I Vapor Recovery System (VRS) shall include either or both of the following [20 DCMR 704.2]:
4. A vapor return line from the storage container to the delivery vessel and a system that will ensure that the vapor return line is connected before gasoline can be transferred into the container; or
5. A refrigeration-condensation system or equivalent designed to recover no less than ninety percent (90%) by weight of the organic compounds in the displaced vapor.
6. If a vapor-tight return system is used to meet the requirements of Condition II(b)(1) the system shall be constructed as to be adapted to retrofit with an absorption system, refrigeration-condensation system, or equivalent vapor removal system. [20 DCMR 704.3]
7. The operation or maintenance of any delivery vessel, or of any part of any liquid delivery system, or vapor collection or recovery system used or designed to be used in connection with the loading or unloading of the delivery vessel, shall be performed in a manner that is vapor-tight or in a manner so that there is no avoidable visible liquid leakage or liquid spillage. [20 DCMR 704.6]
8. The tank shall only be filled with the use of delivery vessels with posted certificates showing that the vessel passed a leak test within the past year in accordance with 20 DCMR 704.4(b) and (c). [20 DCMR 704.4(f)]
9. Gasoline throughput shall be maintained below 10,000 gallons every calendar month. [20 DCMR 201]
10. The Permittee shall not handle or 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 [40 CFR 63.11116(a)]:
11. Minimize gasoline spills;
12. Clean up spills as expeditiously as practicable;
13. Cover all open gasoline containers and all gasoline storage fill-pipes with a gasketed seal when not in use; and
14. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
15. Portable gasoline containers that meet the requirements of 40 CFR 59, Subpart F, are considered acceptable for compliance with Condition II(b)(8)(C). [40 CFR 63.11116(d)]
16. Monitoring and Testing Requirements:
17. The Permittee shall monitor operation of the equipment to ensure compliance with Condition II(b)(5).
18. Prior to filling of the tank by a delivery vessel, the Permittee shall take affirmative action to ensure that the delivery vessel has a clear and unequivocal certificate indicating that it has been leak tested within the past year and the leak test showed compliance with the standards specified on Condition II(b)(6). [20 DCMR 704.4(f)]
19. The Permittee shall monitor gasoline throughput on a monthly basis and otherwise as necessary to ensure compliance with Condition II(b)(7).
20. Record Keeping and Reporting Requirements:

Except where a longer period is specified herein, the Permittee shall maintain all record specified herein for not less than three (3) years from the date the information is obtained [20 DCMR 500.8]:

1. The Permittee shall maintain copies of the manufacture’s specifications and design drawing for the tank and VRS to document compliance with Condition II(b)(1) through (4) for the entire life of the tank.
2. The Permittee shall maintain records of any leak identified pursuant to the monitoring required by Condition II(c)(1) and the actions taken to correct the identified problem.
3. The Permittee shall maintain records of each delivery of fuel and documentation that each delivery vehicle was checked to ensure compliance with Condition II(b)(6). The person checking to ensure that an appropriate certificate is posted on the delivery vehicle shall initial and date the record of this check.
4. The Permittee shall maintain a record of the monthly throughput of the gasoline dispenser and must make these records available within 24 hours of a request by the Department or EPA. [20 DCMR 500.1 and 40 CFR 63.11116(b)]

If you have any questions, please call me at (202) 535-1747 or John Nwoke at (202) 724-7778.

Sincerely,

Stephen S. Ours, P.E.

Chief, Permitting Branch

SSO:NOA