



## REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

117 South Main Street, Dayton, Ohio 45422-1280

937-225-4435 — Fax: 937-225-3486

[www.rapca.org](http://www.rapca.org)

October 27, 2010

**Certified Mail**

Rashid Mahmud  
Lo-Cost Sunoco  
1053 Selma Road  
Springfield, OH 45505

**RE: Ohio EPA Facility ID 0812100567  
Failure to pass annual stage II vapor recovery compliance testing**

**WARNING LETTER**

Dear Mr. Mahmud:

On August 24, 2010, the Regional Air Pollution Control Agency (RAPCA) conducted an inspection and witnessed a performance test of the Lo-Cost Sunoco gasoline dispensing facility (GDF) located at 1053 Selma Road in Springfield, Ohio. The purpose of this inspection and performance test was to determine the GDF's compliance status with applicable state and local air pollution control regulations. This inspection/test at Lo-Cost Sunoco revealed violations of these regulations.

Pursuant to Ohio Administrative Code (OAC) rule and Clark County Combined Health District Air Pollution Control Regulations (CCCHDAPCR) section 3745-21-09 (DDD)(2) and in accordance with the testing requirements specified in CARB Executive Order G-70-165, static leak testing, vacuum integrity testing, and air to liquid ratio (A/L) testing shall be successfully conducted at least once in each consecutive twelve-month period. Lo-Cost Sunoco failed to show compliance with OAC rule and CCCHDAPCR section 3745-21-09 (DDD)(2) and CARB Executive Order G-70-165, through the completion of a successful static leak test, vacuum integrity test and A/L test on August 24, 2010, due to the fact that there was not enough fuel in the storage tanks to perform testing. On this date, an Official Order was issued to Lo-Cost Sunoco to make any needed repairs and reschedule testing within a thirty (30) day time period. To date, no additional testing has been scheduled with RAPCA at this GDF.

Failing to demonstrate compliance with the testing requirements is a violation of OAC rule and CCCHDAPCR section 3745-21-09 (DDD)(2), CARB Executive Order G-70-165, and Ohio Revised Code (ORC) 3704.05.

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Since the above noted GDF is currently operating in violation of OAC rule and CCCHDAPCR section 3745-21-09 (DDD)(2), CARB Executive Order G-70-165 and ORC 3704.05, it is imperative that Lo-Cost Sunoco ensure that repairs are made to this site to correct any deficiencies and reschedule testing to demonstrate compliance.

**Lo-Cost Sunoco shall respond within fourteen (14) days after receipt of this letter.** The response shall include the intended retest date for this GDF. Your tester should contact Lynn Thompson at (937) 225-4437, to ensure a RAPCA representative is present at your scheduled testing.

Failure to perform the required testing will subject this facility to further enforcement actions, which may include penalties. If you have any questions or comments concerning this matter, please feel free to contact me at (937) 225-5923.

Sincerely,



Brandie K. Lehman  
Air Pollution Control Specialist

cc:	Jeff Canan	RAPCA
	Tom Kalman	OEPA
	William MacDowell	USEPA, Region V

COMPLETE THIS SECTION

COMPLETE THIS SECTION ON DELIVERY

CONTROL AGENCY

Wade & Preble Counties

937-45422-1280

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- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

A. Signature  Agent  Addressee  
 X 

B. Received by (Printed Name) C. Date of Delivery  
 NAEEM ABBAS 10-28

D. Is delivery address different from item 1?  Yes  No  
 If YES, enter delivery address below:

1. Article Addressed to:

Rashid Mahmud  
 Lo-Cost Sunoco  
 1053 Selma Road  
 Springfield, Ohio 45505

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number (Transfer from service label) 7010 1060 0000 0187 3080

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

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