



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL #70093410000219339995
RETURN RECEIPT REQUESTED**

September 20, 2010

Mike Abuaun
A and S Petroleum
3742 Fulton Road
Cleveland, OH 44109

NON-HPV

FACILITY ID: 13-18-00-6159

NOTICE OF VIOLATION: Failure to conduct Stage II testing

Dear Mr. Abuaun:

On September 8, 2010 and September 10, 2010, the Cleveland Division of Air Quality (CDAQ) inspected A and S Petroleum located at 3742 Fulton Road in Cleveland. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

A and S Petroleum is in violation of Ohio Administrative Code (OAC) Rule 3745-21-09(DDD)(1)(c) which states that no owner or operator of a gasoline dispensing facility (GDF) may cause, allow, or permit the transfer of gasoline from a stationary tank at a GDF into a motor vehicle unless the vapor control system successfully passes the testing requirements contained in OAC Rule 3745-21-09(DDD)(2).

A and S Petroleum has failed to conduct Stage II testing as required by Ohio Administrative Code (OAC) Rule 3745-21-09(DDD)(2)(f) at the frequency specified in the California Air Resources Board (CARB) certification for the Stage II vapor recovery equipment. Executive Order G-70-150-AD states that the owner or operator of the installation shall conduct, and pass, an Air-to-Liquid (A/L) Ratio test as specified in TP-201.5 and a Static Pressure Decay (SL) test as specified in Exhibit 3, no later than 60 days after startup and at least once in each twelve month period thereafter. The last recorded successful test was performed August 12, 2009.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that A and S



Petroleum complete the following requirements:

- Complete annual Stage II testing and submit test results

This must be completed within thirty (30) days of receipt of this letter and applicable documents should be sent to the following enforcement representative:

Andrew Kenney
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

If there is insufficient time to correct the alleged violations within this timeframe, a written response which includes a timeline for correcting the alleged violations, must be received within thirty (30) days of receipt of this letter.

Violations of Ohio air pollution laws and /or permit terms and conditions are subject to the penalties stipulated in Ohio Revised Code Section 3704.99(A), which allows fines of not more than twenty-five thousand dollars or imprisonment for not more than one year, or both, for each violation.

Free assistance with state and/or federal regulations, rules, laws or permit conditions can be provided at no charge through the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP). OCAPP can be contacted at <http://www.epa.ohio.gov/ocapp> or (614) 644-3469 or (800) 329-7518.

CDAQ makes no guarantee that the facility will meet the qualifying guidelines established by OCAPP.

CDAQ issues this letter with Ohio EPA's concurrence. The failure to mention any specific violation does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for A and S Petroleum: 13-18-00-6159.

Sincerely,

Linda Kimmy for G.B.
George Baker
Chief of Enforcement

GB/ak

cc: Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318006159\2010-9-10 NOV.doc



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**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL #70093410000219339582
RETURN RECEIPT REQUESTED**

October 22, 2010

Mike Abuaun
A and S Petroleum
3742 Fulton Road
Cleveland, OH 44109

NON-HPV

FACILITY ID: 13-18-00-6159

SECOND NOTICE OF VIOLATION: Failure to conduct Stage II testing

Dear Mr. Abuaun:

On September 8, 2010 and September 10, 2010, the Cleveland Division of Air Quality (CDAQ) inspected A and S Petroleum located at 3742 Fulton Road in Cleveland. On September 20, 2010, CDAQ issued a Notice of Violation to A and S Petroleum notifying you that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions. This letter notifies you that you are still in violation of the following applicable air statutes, air regulations, or air permit conditions.

A and S Petroleum is in violation of Ohio Administrative Code (OAC) Rule 3745-21-09(DDD)(1)(c) which states that no owner or operator of a gasoline dispensing facility (GDF) may cause, allow, or permit the transfer of gasoline from a stationary tank at a GDF into a motor vehicle unless the vapor control system successfully passes the testing requirements contained in OAC Rule 3745-21-09(DDD)(2).

A and S Petroleum has failed to conduct Stage II testing as required by Ohio Administrative Code (OAC) Rule 3745-21-09(DDD)(2)(f) at the frequency specified in the California Air Resources Board (CARB) certification for the Stage II vapor recovery equipment. Executive Order G-70-150-AD states that the owner or operator of the installation shall conduct, and pass, an Air-to-Liquid (A/L) Ratio test as specified in TP-201.5 and a Static Pressure Decay (SL) test as specified in Exhibit 3, no later than 60 days after startup and at least once in each twelve month period thereafter. The last recorded successful test was performed August 12, 2009.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that A and S Petroleum complete the following requirements:

- Complete annual Stage II testing and submit test results



This must be completed within ten (10) days of receipt of this letter and applicable documents should be sent to the following enforcement representative:

Andrew Kenney
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

If there is insufficient time to correct the alleged violations within this timeframe, a written response which includes a timeline for correcting the alleged violations, must be received within ten (10) days of receipt of this letter.

Violations of Ohio air pollution laws and /or permit terms and conditions are subject to the penalties stipulated in Ohio Revised Code Section 3704.99(A), which allows fines of not more than twenty-five thousand dollars or imprisonment for not more than one year, or both, for each violation.

Free assistance with state and/or federal regulations, rules, laws or permit conditions can be provided at no charge through the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP). OCAPP can be contacted at <http://www.epa.ohio.gov/ocapp> or (614) 644-3469 or (800) 329-7518.

CDAQ makes no guarantee that the facility will meet the qualifying guidelines established by OCAPP.

CDAQ issues this letter with Ohio EPA's concurrence. The failure to mention any specific violation does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for A and S Petroleum: 13-18-00-6159.

Sincerely,

Linda Kymmy for G.B.

George Baker
Chief of Enforcement

GB/ak

cc: Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318006159\2010-9-10 NOV2.doc

13-18-00-6154



Amer Abuaun

Samira Salama Abuaun

Sole Member

November 14, 2010
(216) 351-1133

November 14, 2010

To whom it may concern:

My name is Amer Abuaun and I am the manager for F and D Gas on the corner of Fulton and Denison. Our business has been dealing with a never-ending struggle for quite some time now as we try to have our pump issues repaired and resolved. We have been dealing with LC Petro for over a year now, spending thousands of dollars as they advise us that our issues are resolved but it's always only for so long. When they come back they claim that there is a whole new issue or "The part is ordered" which is another bill that they stick us with to eventually find ourselves right back in the same position. We decided to change companies and we are now dealing with Oscar Larson who have been very honest with us in regards to our pumps. Oscar Larson advised us that all LC Petro have been doing is buying time and giving us a temporary fix for an issue that can not be resolved without completely replacing the pumps. The new company we are now dealing with, Oscar Larson, feels terrible that they are even charging us for work they are doing because the issues are fixed just temporarily. F and D Gas are in the process of purchasing new pumps as we speak. We apologize for any inconvenience we are causing due to the issues that we have been faced with and would like to ask for a small extension so we can have our pumps replaced.

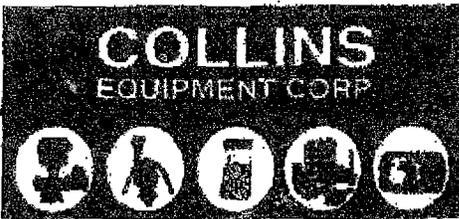
Sincerely,

Amer Abuaun

RECEIVED

NOV 22 2010

NOV 22 2010



3005 EAST 55TH STREET CLEVELAND, OHIO 44127-1290
PHONE: 216-641-4300 OHIO WATS 800-362-3103
SALES FAX: 216-641-1024 OFFICE FAX: 216-641-8001

E-MAIL: sales@collinsequip.com WEBSITE: www.collinsequip.com
Liquid Handling Equipment Sales and Service Rebuilding Installation

F N D GAS
CLEVELAND, OH 44127

Quote No. 27919

In reply, refer to this number

Date: 11/03/10

Project Name/Location:

FND GAS
MIKE ABUAUN
CLEVELAND, OH

Del:

FOB:

Terms:

No applicable taxes included.

We are pleased to submit our quotation based upon our interpretation of your requirements, subject to terms and conditions printed on reverse side of this proposal.

WE ARE PLEASED TO QUOTE ON FURNISHING THE FOLLOWING PER YOUR REQUEST:

ANY QUANTITY OF DRESSER WAYNE PCI COMPLIANT DISPENSER WITH WAYNE VAC, CARD READER
PRINTER AND 63" VALANCE.

TOTAL COST FOR THE ABOVE . . \$14,599.00 EACH DISPENSER(REFLECTS QUICK PAY IN ADVANCE DISCOUNT)

THE INCOMING FREIGHT COST FOR THE ABOVE WILL BE \$175 PER DISPENSER TO OUR WAREHOUSE OR YOUR
SITE LOCATION.

NOTE: NO HANGING HARDWARE NOR INSTALLATION IS INCLUDED ON THIS QUOTE.

Thank you for contacting Collins Equipment Corp. and allowing us to provide this pricing.

Sale of original equipment manufacturer's (OEM) products is subject to the OEM's warranty provisions; and under no circumstances shall the seller or the OEM be liable for any incidental, consequential, or special damages to include, but not limited to loss of profit, loss of product, or any other costs associated therewith.

PURCHASER
By _____
DULY AUTHORIZED AGENT
Date _____

By _____

TITLE

Terms and Conditions printed on reverse side of this sheet, and any attachments hereto, constitute a part of this

RELIABLE OIL EQUIPMENT, INC

Quotation

Date Nov 12, 2010	Page 1
Order Number QT0001366	

7476 WEBSTER ST
DAYTON, OH 45414
USA
Phone: (937) 461-4880
Fax: (937) 461-3257

Sold To:

F&D GAS
3742 FULTON ROAD
CLEVELAND, OH 44109

Ship To:

F&D GAS
3742 FULTON ROAD
CLEVELAND, OH, 44109

Reference	PO Number MIKE	Customer No. CASHCLE	Salesperson THC	Order Date Nov 12, 2010	Ship Via UPS	Terms 600
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Qty. Ord.	Qty. Shp.	Qty. B/O	Item Number	Description	Unit Price	UOM	Extended Price
4.0000	0.0000	4.0000	GIL*NM1-2-500S	ENCORE 500S 3 GR BLENDER 2 SIDES GILBARCO ENCORE 500S 3+0 BLENDER, GENERIC SPEC INCLUDES: - MONOCHROME CRIND - JUNCTION BOX - TWO SIDED SPEAKER KIT - VAPOR VAC - TOTALIZERS PER INLET GRADE - TWO YEAR PARTS AND LABOR WARRANTY - FOUR YEAR CORROSION RESISTANCE WARRANTY NOTE: - PRICE DOES NOT INCLUDE HANGING HARDWARE, INSTALLATION, PURGING OR CALIBRATION	15,634.00	EA	62,536.00
1.0000	0.0000	1.0000	VER*P063-090-01-R	SMART FUEL CONTROLLER, W/ 2 GLGB BC SMART FUEL CONTROLLER IS INTERFACE FROM RUBY TO GILBARCO DISPENSERS.	1,420.00	EA	1,420.00

Comments: THANK YOU	Tax Summary:		Less	
	CLE	4,956.59	Included Tax	0.00
			Order Discount	0.00
			Subtotal	63,956.00
			Total sales tax	4,956.59
		Total order	68,912.59	

WORK ORDER

Oscar W. Larson Co.



10100 Dixie Hwy.
Clarkston, MI 48348

CALL # 10100-0104

DATE 11-12-10

STATION # POSS 9 600

COMPLETED YES _____ NO _____

SITE ADDRESS 3742 FULTON

CROSS STREET _____

CITY Cleveland

STATE Ohio ZIP 44109

PHONE # _____ P.O.# _____

CUST # /BILL TO _____

<input type="radio"/> Clarkston, MI 248-620-0070	<input type="radio"/> Grand Rapids, MI 616-698-0001
<input type="radio"/> Dearborn, MI 810-217-6524	<input type="radio"/> Gaylor, MI 989-732-4190
<input type="radio"/> Sault Ste. Marie, MI 906-632-0491	<input type="radio"/> Fort Wayne, IN 260-496-9870
<input type="radio"/> Toledo, OH 419-873-0555	<input type="radio"/> Indianapolis, IN 317-337-9473

PROBLEM: Get # 5/6 ready for ISSUES

MATERIAL/QTY.	PART # / SERIAL # - DESCRIPTION	CORE Y/N	RET'D Y/N	UNIT PRICE	TOTAL PRICE
5	Use cables				215.21
NOTE: Please use 10' Braid 5000' instead of cables, or cut up old Braid. I will ask to see them to Braid. But we need to be prepared.					

WORK PERFORMED:
 Replaced damaged cables on # 41-2-5-6-7, all cables were cut and twisted tied together. Also all grounders are operative. Will be ready for testing. All 1/2, 3/4, 1/2 B are out.
 All are out as indicated. Note: Cable damaged on ground wire. Will be ready for testing.

RENTAL / SUBS / OTHER				SUB TOTAL	
QTY	DESCRIPTION / SUB PO.#	UNIT PRICE	TOTAL PRICE		
PAID C # 10100 1/12/10					
				SUB TOTAL	

LABOR				SUB TOTAL	
TECH #	HOURS	RATE	TOTAL		
10178					
Chavez			300.00		
Saban			215.21		
				SUB TOTAL 515.21	

SIGNATURE [Signature]
 PRINTED NAME Anna Herrera

DATE 11/12/10

MATERIALS _____
 RENTAL/SUBS/OTHER _____
 LABOR _____
 SALES TAX 36.09
 TOTAL 551.30

By signing above person acknowledges he or she is authorized to sign on behalf of company and hereby acknowledges and agrees to the terms and conditions on reverse side of form.



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
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216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL #70093410000219339636
RETURN RECEIPT REQUESTED**

November 23, 2010,

Amer Abuaun
A and S Petroleum
3742 Fulton Road
Cleveland, OH 44109

**FACILITY ID: 13-18-00-6159
RECEIPT OF CORRECTIVE ACTION PLAN: Failure to conduct Stage II testing**

Dear Mr. Abuaun:

On September 10, 2010 and October 22, 2010, the Cleveland Division of Air Quality (CDAQ) issued Notices of Violations requesting that A and S Petroleum complete Stage II testing. CDAQ is in receipt of failed annual air-to-liquid Stage II test results from a test performed on August 25, 2010. You have been operating out of compliance since August 25, 2010. The failure to successfully pass the testing requirements specified in Ohio Administrative Code (OAC) Rule 3745-21-09 (DDD)(2) while causing, allowing or permitting the transfer of gasoline from a stationary storage tank into a motor vehicle is a violation of the Ohio Revised Code (ORC) Chapter 3704.05 (G) and OAC Rule 3745-21-09 (DDD)(1)(c).

On November 22, 2010, CDAQ received a letter from A and S Petroleum requesting an extension of time to repair pumps and perform and pass an air-to-liquid Stage II test.

You are expected to comply with performing and passing an air-to-liquid Stage II test within 30 days of receipt of this letter. Failure to do so may result in referral to Ohio EPA or U.S. EPA for further enforcement action. Fulfillment of your commitments included in the corrective action plan and/or any modifications contained within this letter does not constitute a waiver of CDAQ's ability to refer this matter to Ohio EPA or U.S. EPA for further enforcement action. Please submit any future correspondence related to this matter to the following enforcement representative:

Andrew Kenney
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839



CDAQ issues this letter with Ohio EPA's concurrence and does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for A and S Petroleum: 13-18-00-6159.

Sincerely,

Grinda Kimmy for G.B.

George Baker
Chief of Enforcement, CDAQ

GB/ak

cc: John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318006159\2010-9-10 RCAP.doc

F&D*Amer Abuaun*
Samira Salama AbuaunNovember 14, 2010
Sole Member
(216) 351-1133

To whom it may concern:

My name is Amer Abuaun and I am the manager for F and D Gas on the corner of Fulton and Denison. It has been a never-ending battle to have my pump issues resolved and taken care of. I have been dealing with LC Petro for quite some time now as they continued to give me a temporary fix and claim that the issue was resolved. I can't even begin to tell you how much money has been on these pumps being worked on just in this year. LC Petro would come work on the pumps; charge us money time and time again then claim that the pumps were fixed but that would only last so long. Basically, LC Petro made a killing on us over and over claiming that our pumps were good to go for a week or so or that they were "Waiting on a part" for weeks sometimes months at a time but the issue was never resolved. Thankfully, we are now dealing with Oscar Larson who advised us we need our pumps replaced. We are currently in the process of getting new pumps. They are ordered and in process now. I do apologize for any inconvenience that me or our business has caused all I ask is if you can please give us a little of an extension while we finish getting this issue resolved because it is getting worked on.

Sincerely,

Amer Abuaun

WORK ORDER

Oscar W. Larson Co.



10100 Dixie Hwy.
Clarkston, MI 48348

CALL # 101027-0104

DATE 11-12-10

STATION # COAS & CO

COMPLETED YES NO

SITE ADDRESS 3742 FULTON

CROSS STREET

CITY Cleveland STATE OHIO ZIP 44109

PHONE # _____ RO.# _____

CUST # /BILL TO _____

<input type="radio"/> Clarkston, MI 248-620-0070	<input type="radio"/> Grand Rapids, MI 616-698-0001
<input type="radio"/> Dearborn, MI 810-217-6524	<input type="radio"/> Gaylord, MI 888-732-4190
<input type="radio"/> Sault Ste. Marie, MI 906-632-0491	<input type="radio"/> Fort Wayne, IN 260-496-9870
<input type="radio"/> Toledo, OH 419-873-0555	<input type="radio"/> Indianapolis, IN 317-337-9473

PROBLEM: Get # 5/6 Ready for testing

MATERIAL/QTY.	PART # / SERIAL # - DESCRIPTION	CORE Y/N	RET'D Y/N	UNIT PRICE	TOTAL PRICE
<u>5</u>	<u>Vac Cables</u>				<u>215.31</u>
<p><i>NOTE Pumps are in Bad shape most of cables are cut up or bad. I was able to get them to pump. But vac's need to be replaced.</i></p>					

WORK PERFORMED:
Replaced Damaged cables on # 1-2-5-6-7. All cables were cut and twisted tied together. Now all pumps are operating # 5/6's ready for testing. But 1/2/3/4/7/8 are not.

We are getting involved with other companies could not do Dist work to make them.

RENTAL / SUBS / OTHER			
QTY	DESCRIPTION / SUB RO.#	UNIT PRICE	TOTAL PRICE
	<u>PAID # 1617</u>		
SUB TOTAL			

LABOR			
TECH #	HOURS	RATE	TOTAL
<u>W178</u>			
<u>5 hours Labor</u>			<u>340.00</u>
			<u>215.31</u>
SUB TOTAL <u>555.31</u>			

SIGNATURE [Signature]
 PRINTED NAME Amey Alvares DATE 11/12/10

MATERIALS _____
 RENTAL/SUBS/OTHER _____
 LABOR _____
 SALES TAX 36.09
 TOTAL 591.40

By signing above person acknowledges he or she is authorized to sign on behalf of company and hereby acknowledges and agrees to the terms and conditions on reverse side of form.



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL #70093410000219339735
RETURN RECEIPT REQUESTED

January 31, 2011

Amer Abuaun
A and S Petroleum
3742 Fulton Road
Cleveland, OH 44109

NON-HPV

FACILITY ID: 13-18-00-6159

THIRD NOTICE OF VIOLATION: Failure to Conduct Stage II Testing

Dear Mr. Abuaun:

On September 10, 2010 and October 22, 2010, the Cleveland Division of Air Quality (CDAQ) issued Notices of Violations requesting that A and S Petroleum complete Stage II testing. CDAQ is in receipt of failed annual air-to-liquid Stage II test results from a test performed on August 25, 2010.

On November 22, 2010, CDAQ received a letter from A and S Petroleum requesting an extension of time to repair pumps and perform and pass an air-to-liquid Stage II test. On November 23, 2010, CDAQ issued a Receipt of Corrective Action Plan letter granting 30 days to schedule and perform an air-to-liquid Stage II test.

This letter serves as notification that you are still operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

The failure to successfully pass the testing requirements specified in Ohio Administrative Code (OAC) Rule 3745-21-09 (DDD)(2) while causing, allowing or permitting the transfer of gasoline from a stationary storage tank into a motor vehicle is a violation of the Ohio Revised Code (ORC) Chapter 3704.05 (G) and OAC Rule 3745-21-09 (DDD)(1)(c).

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that A and S Petroleum schedule and complete an air-to-liquid Stage II within fourteen (14) days of receipt of this letter. The scheduling of the test must be submitted to the following enforcement representative:



Andrew Kenney
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

If there is insufficient time to correct the alleged violations within this timeframe you must submit a written response within seven (7) days of receipt of this letter. Your response must include a timeline for correcting the alleged violations.

Violations of Ohio air pollution laws and /or permit terms and conditions are subject to the penalties stipulated in Ohio Revised Code Section 3704.99(A), which allows fines of not more than twenty-five thousand dollars or imprisonment for not more than one year, or both, for each violation.

Free assistance with state and/or federal regulations, rules, laws or permit conditions can be provided at no charge through the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP). OCAPP can be contacted at <http://www.epa.ohio.gov/ocapp> or (614) 644-3469 or (800) 329-7518. CDAQ makes no guarantee that the facility will meet the qualifying guidelines established by OCAPP.

CDAQ issues this letter with Ohio EPA's concurrence. The failure to mention any specific violation does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for A and S Petroleum: 13-18-00-6159.

Sincerely,

Linda Kimmy
Field Enforcement Manager

LK/ak

cc: George P. Baker, CDAQ
Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318006159\2010-9-10 NOV3.doc

F&D
GAS LTD

10pg's

Samira Salama Abuaun

Sole Member
(216) 351-1133

(216) 244-6342

Dear Ms Kimmy,

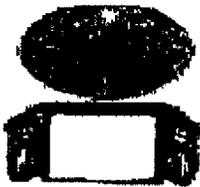
This is A&S petroleum regarding Stage II testing. We have received your letter concerning this matter. We had an appointment with (ECT) and Oscar Larson. The test was scheduled for 1/12/2011 and neither company showed for testing. Due to failure of either companies showing up, we tried to re-schedule. We are still waiting for a re-scheduling date due to the matter. In regards to your letters we appreciate all of your patients with us. We brought to your attention that we purchased new pumps. As time has passed, we have received the new pumps on 2/7/2011 and spoke to (ECT) about doing the work and testing. We're hoping within 10 days the pumps will be working and tested, upon (ECT's) arrival. We appreciate you working with us on the matter and understanding the circumstances we were in and we want to cooperate with agency 13 and others.

Thank you for your time

A&S



3742 Fulton Road Cleveland, OH 44109-2374



GRAFFCO Inc.
SPEC-RITE
PUMPS & DISPENSERS

(651) 464-1079
Fax (651) 464-8614
Toll free (800) 443-1219
www.graffco.com

Important-Please Read
-Terms of the sale-

C.O.D. payments must be either certified check or money order unless prior arrangements are made. If terms are "On Account," the net amount is due in 10 days from date of invoice. A service charge of 1 1/2% of the unpaid balance will be added after 30 days. A restocking charge of 20% will be assessed on unauthorized returns.

"Dispenser/Pump Part Replacement Policy"

The equipment listed on the attached sales order is covered by the following part replacement policy. This warranty does not include POS equipment, tank monitoring equipment and peripherals. This warranty will not include issues of incompatibility or function with regard to used keypad(s), software or hardware requiring updates. POS equipment, tank monitoring equipment, peripherals and card reader printing devices are limited to 90days from date of shipment.

Graffco will provide a replacement part for defective parts if Graffco is notified within 90 days from date of shipment. The defective part(s) must be returned to Graffco. Graffco will pay freight (UPS ground) on replacement part(s).

Graffco will not be responsible or liable for labor charges, travel charges, loss of use, direct or indirect, special or consequential damages arising out of, or in connection with the use or performance of the product(s) or other damages with respect to loss of property, loss of revenue or profit, cost of removal, installation or reinstallation. Pump and meter unit(s): guaranteed to be free and rotate, no other warranty applies.

This part replacement policy does not apply to damages caused by sand or abrasive materials pumped with the fluid, lightning, improper voltage supply, careless handling, improper installation or start up procedures.

Warranty Exclusions: internal or external vacuum assist or balance vapor recovery system components. Examples; hoses, nozzles, swivels, breakaways or vacuum motors, adjustments or replacement of vacuum assist electronic components for velocity or revolutions per minute (RPM). Graffco Incorporated assumes no responsibility for vapor/liquid ratio or pressure tightness testing under the provisions of this policy. Graffco Incorporated will not honor oral statements by the sales-staff not consistent with this warranty policy. All sales are final, no refunds, no returns.

The prices, specifications, conditions and part replacement policy are satisfactory and are hereby accepted. Payment will be made as outlined above.

Salesperson signature _____ Date _____

Customer signature Amr Abuwan Date 11/10/11

F&D Gas . 06-1823924

Over 45 Years of Customer Satisfaction



(851) 484-1079
Fax (851) 484-8614
Toll free (800) 443-1219
www.graffco.com

Email: Sraffery@graffco.com

13957 Lake Drive - Forest Lake, MN 55025

Equipment Quote

Jan. 11, 2011

Att: Mike
F & D Gas
3742 Fulton Road
Cleveland, OH. 44109

Phone 216-244-8342

The following is our proposal/invoice to supply you the following listed equipment as requested
(4) Wayne Ovation Dispenser, 3+0, Blender, Credit Card Reader, Vapor Vac,
Electronically Tested & Cleaned \$8500.00ea.

Note: Plus \$995.60 Shipping if prepaid in full. 90 Day Parts Exchange Warranty on Electronics.

Total Proposal \$26,995.60 Includes Shipping.

To place your order, please sign and fax this and the "Terms of Sale" page to our office and call Fedex (800-463-3339) -> use our account #1177-8895-4) to pickup your down payment check or your full payment check, otherwise the balance would be due prior to shipping. 50 percent down payment required to start production. PCI Compliant keypads will need to be paid for in full at the time of the order. The PCI Compliant Keypads are not returnable. Should you have any questions or comments, please feel free to contact any of the Graffco Sales team. A tax exempt certificate must be submitted to Graffco and kept on file on all orders otherwise sales tax will be added accordingly.

Shawn Rafferty

Shawn Rafferty, ext: #14

Order Acknowledgement

By: Mike Abcarian Date: 11/10/11

PO# _____

F&D - GAS



NOTICE OF HOLD

Customer Name: GRAFFCO, INC.

Account Number: XXXXXXXXXXXX1683

Date of Transaction: 01/13/11

Date of Notice: 01/12/11

Amount of Deposit: \$26,995.00

Cashed Check Amount:

We are delaying the availability of \$21,995.00 These funds will be available as follows:

\$21,995.00 will be available on January 25 , 2011

The funds are being held due to: Deposited Check > \$5000

Notice given at time of transaction? Yes No

If you did not receive a notice at the time of your transaction and the check(s) subject to this hold is paid, we will refund to you any fees for overdrafts or returned checks that result solely from the additional delay that we are imposing. To obtain a refund of such fees, please contact your branch or account officer.

Prepared by: MARK BALLOK

Phone #: 216-252-1027

Branch: U.S. BANK LORAIN ROAD

L

Customer Copy

Sales Order 34192

Customer No. FDG001



GRAFFCO
 PUMPS & DISPENSERS

Graffco, Inc.
 13967 Lake Drive
 Forest Lake, MN 55026
 Fax: 851/484-8814
 Telephone 800/443-1219

Bill To:
 F&D Gas
 3742 Fulton Road
 Cleveland, OH 44109

Ship To:
 F&D Gas
 3742 Fulton Road
 Cleveland, OH 44109

Date		Ship Via		F.O.B.		Terms		
01/12/11		BJ Transport		Origin		Prepay		
Purchase Order Number			Order Date		Salesperson		Our Order Number	
Signed Order			01/12/11		SR		None	
Quantity		Item Number		Description		Tax	Unit Price	Amount
Required	Ship	B.O.						
4		SEET		WayneOvlon,3+0,Blend,VapVac,Card		N	6500.00	26000.00
1		SHIPFRT		Shipping/Trucking Charges		N	995.60	995.60
<p>Full Payment Received 1/13/11 SHIP WITHIN REACH</p>								

Shipping is added to the order - 90 day parts exchange warranty on electronics
 dispensers are Wayne Ovation, 3+0, Blender, Card Reader, Vapor Vac, Credit
 Card Reader, Electronically Tested & Cleaned
 Items are branded with Cenoples.

NonTaxable Subtotal	26995.60
Taxable Subtotal	0.00
Tax	0.00
Total Order	26995.60

This Sales Order, along with the Warranty Form, and Spec-Rite form if any,
 represents the entire agreement, there are no oral representations,
 sales are final, no refunds, no returns,



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 70093410000219338967
RETURN RECEIPT REQUESTED

February 11, 2011

Amer Abuaun
A and S Petroleum
3742 Fulton Road
Cleveland, OH 44109

FACILITY ID: 13-18-00-6159
SECOND RECEIPT OF CORRECTIVE ACTION PLAN: FAILURE TO CONDUCT STAGE II TESTING

Dear Mr. Abuaun:

On September 10, 2010 and October 22, 2010, the Cleveland Division of Air Quality (CDAQ) issued Notices of Violations requesting that A and S Petroleum complete Stage II testing. CDAQ is in receipt of failed annual air-to-liquid Stage II test results from a test performed on August 25, 2010.

On November 22, 2010, CDAQ received a letter from A and S Petroleum requesting an extension of time to repair pumps and perform and pass an air-to-liquid Stage II test. On November 23, 2010, CDAQ issued a Receipt of Corrective Action Plan letter granting 30 days to schedule and perform an air-to-liquid Stage II test.

On January 31, 2011, CDAQ issues a Third Notice of Violation for failing to perform and pass an air-to-liquid Stage II test.

CDAQ is in receipt of a faxed letter from A and S Petroleum requesting a second extension of ten (10) days to replace and test four gasoline dispensing pumps as of February 9, 2011.

You are expected to comply with performing and passing an air-to-liquid Stage II test no later than February 22, 2011. Failure to do so may result in referral to Ohio EPA or U.S. EPA for further enforcement action. Fulfillment of your commitments included in the corrective action plan and/or any modifications contained within this letter does not constitute a waiver of CDAQ's ability to refer this matter to Ohio EPA or U.S. EPA for further enforcement action. Please submit the scheduling of the test and any future correspondence related to this matter to the following enforcement representative:

Andrew Kenney
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

CDAQ issues this letter with Ohio EPA's concurrence and does not excuse any violations of



local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for A and S Petroleum: 13-18-00-6159.

Sincerely,

Linda Kimmy

Linda Kimmy
Field Enforcement Manager, CDAQ

LK/ak

cc: John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318006159\2010-9-10 RCAP2.doc



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL #70093410000219339025
RETURN RECEIPT REQUESTED**

March 18, 2011

Amer Abuaun
A and S Petroleum aka F and D Gas
3742 Fulton Road
Cleveland, OH 44109

**FACILITY ID: 13-18-00-6159
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Abuaun:

On September 20, 2010, and October 22, 2010, the Cleveland Division of Air Quality (CDAQ) issued Notices of Violations requesting that A and S Petroleum aka F and D Gas complete Stage II testing. CDAQ is in receipt of failed annual air-to-liquid Stage II test results from a test performed on August 25, 2010.

On November 22, 2010, CDAQ received a letter from A and S Petroleum aka F and D Gas requesting an extension of time to repair pumps and perform and pass an air-to-liquid Stage II test. On November 23, 2010, CDAQ issued a Receipt of Corrective Action Plan letter granting 30 days to schedule and perform an air-to-liquid Stage II test.

On January 31, 2011, CDAQ issued a Third Notice of Violation for failing to perform and pass an air-to-liquid Stage II test.

CDAQ received of a faxed letter from A and S Petroleum aka F and D Gas on February 9, 2011, requesting a second extension of ten (10) days to replace and test four gasoline dispensing pumps.

On March 8, 2011, CDAQ witnessed passing blockage, air-to-liquid and static leak Stage II tests. On March 11, 2011, CDAQ received a permit-by-rule notification for an equipment modification for A and S Petroleum aka F and D Gas.

The corrective action plan was received and appropriate steps were taken to bring the source into compliance. CDAQ has determined that no further enforcement action is warranted at this time, but reserves its right to take such action in the future if necessary.

CDAQ issues this letter with Ohio EPA's concurrence and does not excuse any



violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for A and S Petroleum aka F and D Gas: 13-18-00-6159.

Sincerely,

Linda Kimmy
Field Enforcement Manager, CDAQ

LK/ak

cc: John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318006159\2010-9-10 NEAR.doc