



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Second Floor
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 7011 2000 0002 6936 3037
RETURN RECEIPT REQUESTED**

July 5, 2012

Abeer Qasem
Owner
Al Barakah Group LLC d.b.a. GAS USA
4126 Pearl Road
Cleveland, OH 44109

**FACILITY ID: 13-18-00-7057
RETURN TO COMPLIANCE – NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Ms. Qasem:

On May 22, 2012, the Cleveland Division of Air Quality (CDAQ) inspected GAS USA located at 4126 Pearl Road in Cleveland.

On June 7, 2012, CDAQ issued a Notice of Violation to GAS USA for failure to first obtain authority to operate its emissions unit (EU) G001: Stage I and II Gasoline Dispensing Facility, through issuance of a permit-to-install/operate (PTIO). In addition, CDAQ requested that GAS USA submit a PTIO application or permit-by-rule (PBR) notification form for the operation of your gasoline dispensing facility. CDAQ also requested that GAS USA provide a corrective action plan detailing how GAS USA will record and maintain applicable records under Ohio Administrative Code (OAC) rule 3745-21-09(DDD)(3), and a copy of the training certificate of the required Ohio EPA Stage II training by the owner or operator of GAS USA.

As of June 26, 2012, CDAQ is in receipt of a PBR notification form, a corrective action plan which adequately addresses how GAS USA will record and maintain recordkeeping requirements in compliance with OAC rule 3745-21-09(DDD)(3), and a copy of a certificate for the required Stage II training signifying that the operator or local manager attended and completed the training.

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. If you have any questions, please call Valerie Shaffer at (216) 664-6292. All correspondence with CDAQ must include the Ohio EPA facility identification number for GAS USA: 13-18-00-7057.

Sincerely,

A handwritten signature in cursive script that reads "Valencia White".

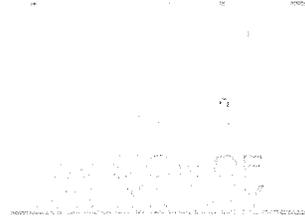
Valencia White
Chief of Enforcement

VW/vs

cc: Maher (Mike) Alayamini, GAS USA - Manager
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318007057\2012-05-22 RTC +
NEAR.docx

June 25, 2012

Valerie Shaffer
Cleveland Division of Air Quality
75 Erieview Plaza, 2nd Floor
Cleveland, OH 44114-1839



RE: Gas USA, Facility ID#13-18-00-7057

Dear Ms. Shaffer:

Ms. Valencia White sent me a letter dated June 7, 2012. In this letter, she requested 1) a PTIO application or PBR notification form for the operation of our gasoline dispensing facility; 2) a corrective action plan detailing how Gas USA will record and maintain applicable records under OAC rule 3745-21-09(DDD)(3); and 3) a copy of the training certificate of the required Stage II training by the owner or operator of Gas USA. These items are due to be submitted to you within 30 days of receipt of the June 7, 2012 letter.

This letter intends to address all requested items, as follows:

1. Please find enclosed a PBR notification form for the operation of our gasoline dispensing facility.
2. Our Corrective Action Plan is attached. This plan describes how we intend to record and maintain applicable records under OAC rule 3745-21-09(DDD)(3). The Plan references record keeping forms that are enclosed with this letter. Also enclosed is a copy of the record keeping form that we intend to use to record information as required by our Permit-by-rule.
3. Enclosed is a copy of the training certificate from the required Stage II training. The training was provided by Environmental Compliance Technologies (ECT) on June 1, 2012.

Please let me know if you have any questions. I may be contacted at (330)224-3526.

Sincerely,

A handwritten signature in black ink, which appears to be "Mike Alay", is written over a horizontal line. The signature is stylized and somewhat cursive.

Mike Alay
Gas USA
4126 Pearl Road
Cleveland OH 44109

Gas USA
4126 Pearl Road
Cleveland OH 44109

JUN 2009

Corrective Action Plan

OAC rule 3745-21-09(DDD)(3) = Recordkeeping Requirements

(a): Any owner or operator of a gasoline dispensing facility which is subject to the requirements of paragraph (DDD)(1) of this rule shall maintain the following records:

(i) The quantity of gasoline delivered to the facility during each calendar month.

Gas USA intends to use the attached monthly record keeping form

(ii) The results of any tests performed pursuant to paragraph (DDD)(2) of this rule.

Gas USA intends to keep these test results in our files

(iii) A log of the date and description of all repair and maintenance work performed (including, but not limited to, work performed to meet manufacturer's specifications or CARB certification requirements), or any other modifications made to the vapor control system.

Gas USA intends to use the attached "Repair/Maintenance" form

(iv) A copy of the most recent operating permit application (including emissions activity category form or appendix form) submitted to the Ohio EPA.

Gas USA will keep a copy of PBR Notification Form

(v) A copy of the most recent operating permit issued by the Ohio EPA.

Gas USA will keep a copy of OAC rule 3745-31-03(A)(4)(i). See attached.

(vi) Proof of attendance and completion of the training required by the Ohio EPA for the operator or local manager of the gasoline dispensing facility.

Gas USA will keep a copy of the training certificate

(vii) Copies of all completed post test inspection forms.

Gas USA will keep a copies of all completed post test inspection forms

(b) All records shall be retained by the owner or operator for a period of not less than three years and shall be made available to the director or any authorized representative of the director for review during normal business hours.

Gas USA intends to keep all records for at least 3 years, and have them be made available to CDAQ staff or any other Ohio EPA representative.



Environmental Compliance Technologies

This is to certify that

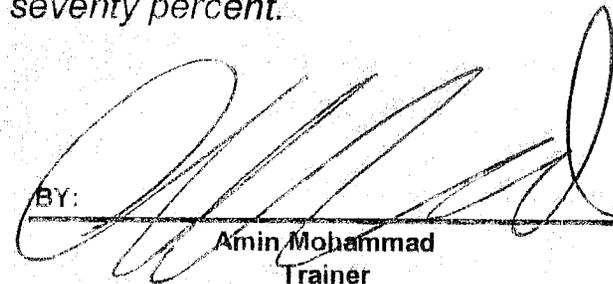
MAHER ALAYAMINI

*has completed the Facility Stage II Training Program and has demonstrated his
his knowledge by successfully completing an examination of the subject
material with a score of greater than seventy percent.*

DATE: 6/1/2012

CERTIFICATION #: S2T-06012012

BY:



Amin Mohammad
Trainer