



REGION 8

DENVER, CO 80202

INSPECTION REPORT

NESHAP 6C: Gasoline Dispensing Facility Inspection

Attached please find the United States Environmental Protection Agency's (EPA's) inspection report of your inspected facility and/or any related fuel delivery inspections identified therein. EPA is providing this report as a matter of agency policy and will contact you again only if needed.

Without making a determination that your business or organization is a small business, EPA is also providing you with a link to this Small Business Resources Information Sheet (<https://www.epa.gov/compliance/small-business-resources-information-sheet>) which provides an array of resources to help small businesses understand and comply with federal and state environmental laws.

Inspection Information	
Inspection Number:	R8_CAA_2024_0910_03
Inspection Date(s):	September 10, 2024
Regulatory Program(s):	40 C.F.R. Part 63, Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities (NESHAP 6C)
EPA Region/Program Conducting Inspection:	EPA Region 8 Enforcement and Compliance Assurance Division Air and Toxics Enforcement Branch
Company Name:	United Pacific / CF Altitude LLC
Facility Name:	Alta Convenience #3106
Facility Physical Location: (street address, building/unit #)	2805 N Elizabeth St
(city, state, zip code):	Pueblo, CO 81003

Inspector and Approval

Katelyn Bergl
Field Inspector Name

Inspector
Title

KATELYN BERGL Digitally signed by KATELYN BERGL
Date: 2024.11.19 17:30:29 -07'00'
Signature

Scott Patefield

Branch Manager

SCOTT PATEFIELD Digitally signed by SCOTT
PATEFIELD
Date: 2024.11.19 15:57:39 -07'00'

FACILITY INSPECTION DETAILS AND OBSERVATIONS

General Facility Information			
Gasoline Dispensing Facility			
Facility Name:	Alta Convenience #3106	Parent Company Name:	CF Altitude LLC
AIRS-ID:	101-0189-001	CAA Permit (if any):	Permit Exempt Number 02PB0393S.XP
Primary Facility Representative & Title:	ODEANA Wilson Corporate Environmental Manager	On-site Facility Representative & Title:	Lola Baca, Manager
Facility Contact Phone/Email:	Odeana.Wilson@unitedpacific.com	On-site Contact Phone/Email:	N/A
Facility Address:	2805 N Elizabeth St, Pueblo, CO 81003		
Enforcement and Compliance History:	None		
Fuel Delivery Company			
Fuel Supply Company Name:	World Kinect Corporation	Trucking Company Name (if different):	Same
Truck Identifier:	8381 (VIN NJ163032)	Trailer Identifier:	0791
Fuel Supply Company Representative & Title:	Ron Browning Operations Manager	Driver Name:	Brian Langley
Fuel Supply Company Contact Phone/Email:	Ronbrowning@wfscorp.com		
Fuel Supply Company Address:	1739 E Platteville Blvd, Pueblo West, CO 81007		
Enforcement and Compliance History:	None		

General Inspection Information				
Inspection Number/ID:	R8_CAA_2024_0910_03	Inspection Date	9/10/2024	
Inspector(s):	Katelyn Bergl (EPA)	Arrival/Departure Time	3:15 PM	4:11 PM
Time Inspector Presented Credentials:	3:15 PM	Administrative Inspection Items:	☒ Announced	☐ Unannounced
Permission to Enter Facility Granted? If Yes, by whom? If No, explain.	☒ Yes ☐ No		☒ CBI Procedures Discussed	
	Lola Baca		☒ SBREFA Form Provided	
		☐ Other materials or compliance assistance provided (describe):		
Photographer Name:	Katelyn Bergl	Photograph Range:	IMG_0040 – IMG_0046; IMG_0048 - 0049 MOV_3526 - 3527	
Weather & Other General Site Observations:	Partly cloudy, 80 deg F, winds 7 mph NE			
Inspection Narrative:	The facility was inspected under the Clean Air Act (CAA) for compliance with 40 C.F.R. Part 63, Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities (NESHAP 6C). Inspection activities included observation of a fuel delivery event by the EPA inspector and a request for records required to be maintained under NESHAP 6C.			
Areas of Concern:	The following are areas of concern identified during the inspection or records review: 1. According to records submitted by the company, this facility had a 12-month gasoline throughput in excess of 1,200,000 gallons in October 2021 for the 12-month period from November 2020 through October 2021, resulting in a monthly throughput of gasoline greater than 100,000 gallons per month. Therefore, in October 2021, the facility became subject to the control requirements of 40 CFR § 63.11118 – Requirements for facilities with monthly throughput of 100,000 gallons of gasoline or more. NESHAP 6C at 40 CFR § 63.11113(c) clarifies that existing sources which become subject to the control requirements of 40 CFR § 63.11118 due to an increase in the monthly throughput must comply with the additional requirements, including installation of a vapor balance system and initial performance testing to demonstrate compliance, no later than three years after the source becomes subject. In this case, the facility appears to have triggered the control requirements in October 2021, and must have complied with 40 CFR § 63.11118 by October 2024. In an email exchange regarding inspection records, a facility representative stated on September 24, 2024 that this facility has			

	“not had the NESHAP testing based on their current throughputs and are outside the Non-Attainment Zone.” However, this facility’s throughput exceeds the trigger which requires the NESHAP testing described at 40 CFR §§ 63.11120(a)(1) and (2). Although CDPHE imposes more stringent requirements for gasoline dispensing facilities within the ozone non-attainment Denver Metro area, the NESHAP 6C testing is required nationwide for facilities that exceed the 100,000 gallon per month threshold.
	2. Components of the tank and associated vapor equipment were not vapor tight during the fuel delivery event, as required by Item 1(b) of Table 1 of NESHAP 6C. The following emissions were observed during the fuel delivery portion of EPA’s inspection: a. Vapors were observed from the RUL spill bucket prior to pipe cap removal and prior to fueling. The components were inspected after fueling and the driver stated that the tank-side gasket was in poor condition, likely causing vapor leak. b. Vapors were observed from the vapor vent and from the RUL spill bucket area during RUL fueling. According to the driver, there is no vapor recovery system at this facility to connect to, so vapor was not recovered by the truck.
	3. The facility has not conducted initial performance tests to demonstrate compliance with the leak rate and cracking pressure requirements specified in item 1(g) of Table 1 of NESHAP 6C, and the static pressure performance requirement specified in item 1(h) of Table 1 of NESHAP 6C, as required by 40 CFR §§ 63.11120(a)(1) and (2). Based on the emission observations recorded during the inspection (described in Area of Concern #2), in conjunction with the driver’s confirmation that there was no vapor recovery system for the truck’s vapor recovery hose to connect to, the existing system is not compliant with 40 CFR § 63.11118.

Gasoline Throughput and Testing Records		
Applicable Throughput Category:		
☐ Calculated based on volume of gasoline loaded into all storage tanks		☒ Calculated based on volume of gasoline dispensed from all storage tanks
☐ <10,000 gallons per month	☐ ≥ 10,000 gallons per month and < 100,000 gallons per month	☒ ≥ 100,000 gallons per month
Date Applicable Throughput Category Was Exceeded:		Based on records provided since 2019, the facility exceeded the 100,000 gallons per month throughput threshold in October 2021.
Records: All Facilities regardless of throughput		Notes

☒ 5-Year Throughput Records Available (5-year records must be maintained and made available within 24 hours of request)	Throughput records for this facility from October 2019 – September 2024 were provided via email by ODeana Wilson on September 24, 2024. The spreadsheet indicates that the records are for the product “gasoline”, and Ms. Wilson clarified that “gasoline” includes unleaded, midgrade, premium, and E-85 blends.					
☒ Last 12-month rolling throughput calculation	Provided along with 5-year throughput records					
Records: Facilities ≥ 100,000 gallons per month	Notes					
☐ 3 -year Leak Rate and Cracking Pressure Test (CARB Test Procedure TP-201.1E, - Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valves, or equivalent)	Date of Last Test:	Never	Results of Last Test:	Pass / Fail	Report Provided:	Yes / No
	This NESHAP 6C performance test was required no later than October 2024, but has not been completed.					
☐ Static Pressure Test (CARB Test Procedure TP-201.3, - Determination of 2-Inch WC Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities, or equivalent)	Date of Last Test:	Never	Results of Last Test:	Pass / Fail	Report Provided:	Yes / No
	This NESHAP 6C performance test was required no later than October 2024, but has not been completed.					

Fuel Delivery Truck Compliance (Gasoline Cargo Tanks under NESHAP 6C)			
Fuel Type:	1) Regular Unleaded (RUL) 2) Premium	Amount of Fuel Delivered:	1) 6,000 gallons 2) 1,800 gallons
Annual Certification Test – Vapor Tightness Testing – EPA Method 27 of appendix A-8 to part 60 of CAA			
Date of Last Test:	11/19/2023	5-Year Test Record Availability:	☒ Available with truck ☐ Available at office or central loc. ☐ Not Available ☐ Other:
Results of Test:	Pass		

Fuel Delivery Event Observation: A fuel delivery event was observed by the EPA inspector. The inspector used a forward-looking

infrared (FLIR) camera to record optical gas imaging (OGI) videos of gasoline vapors. Any auditory, visual, and olfactory (AVO) observations were also recorded. See Appendix A for a list of photographs and videos recorded during the fuel delivery inspection.

Components of the refueling activity which were observed:		Description/Observations (including any OGI or AVO observations)
☒	Conditions of Equipment prior to refueling event	Vapors were observed from the RUL fill spill bucket prior to pipe cap removal and prior to fueling. The components were inspected after fueling and driver stated that the tank-side gasket was in poor condition, likely causing vapor leak (MOV_3526).
☒	Connection of fuel and vapor lines prior to fuel transfer	According to the driver, the gasoline storage tanks at this facility are not designed with a vapor recovery system. Consequently, the driver did not connect the vapor recovery hoses during refueling, and vapors were observed from the tank vapor vents and from the RUL spill bucket area during RUL fueling.
☒	Maintenance of fuel and vapor line connections during fueling event	The gasket on the top of the RUL fill pipe was in poor condition, causing liquid and vapor fuel leak during refueling of the RUL tank. The driver switched out the fuel hose elbow connections to attempt to fix the problem but was not able to prevent the leak. These same elbow connections did not leak fuel or vapors when connected to the premium fill pipe, which indicates that there is an issue with the tank-side gasket on the RUL fill pipe.
☒	Disconnection of fuel and vapor lines after fuel transfer	
☒	Conditions of Equipment after refueling event	

Facility Design Notes			
Component	Design	Quantity/ Capacity	Observations (disrepair, unsealed connections, signs of spills, etc)
Vapor Recovery system	No vapor recovery system installed	0	No vapor recovery system installed to recover vapors from the RUL, premium, or E-85 gasoline storage tanks.
Vapor Vents	It appears that 3 pressure/vacuum (P/V) type vents are installed at the facility, likely associated with the RUL, premium, and E-85 tanks. There is one additional vent, likely for the diesel tank, which is a direct-vent type vent.	4	Due to the absence of a vapor recovery system, the P/V vents do not prevent vapors from being emitted during refueling events, since the large pressure increase in the tanks during a refueling event exceeds the maximum pressure setting of the P/V vents.
Tanks	1 RUL tank; 1 premium tank; 1 E-85 tank; 1 diesel tank	4	
Automatic Tank Gauging (ATG) System	1 for each tank type	4	

Documents Requested			
Document(s)	Status		Notes/Comments
5-year fuel throughput records including previous 12-month fuel throughput calculation	☒ Document(s) Provided ☐ Will Provide After Inspection	☐ Document(s) Denied ☐ Other (see notes)	
EPA Method 27 for the fuel delivery truck	☒ Document(s) Provided ☐ Will Provide After Inspection	☐ Document(s) Denied ☐ Other (see notes)	
NESHAP 6C Initial Performance Tests	☐ Document(s) Provided ☐ Will Provide After Inspection	☐ Document(s) Denied ☒ Other (see notes)	Performance tests not conducted; records not available.

APPENDIX A: Photograph and Video Log

File Name	Description	Photographer
MOV_3526.mp4	Vapors were observed from the RUL fill spill bucket prior to pipe cap removal and prior to fueling.	K. Bergl
MOV_3527.mp4	Vapor were observed from the vapor vent and from the RUL spill bucket area during RUL fueling. According to the driver, there is no vapor recovery equipment at this facility to connect to, so vapor was not recovered by the truck.	K. Bergl
IMG_0040.JPG	Condition of premium tank cover prior to fuel delivery.	K. Bergl
IMG_0041.JPG	Condition of RUL tank cover prior to fuel delivery.	K. Bergl
IMG_0042.JPG	Condition of E-85 tank cover prior to fuel delivery.	K. Bergl
IMG_0043.JPG	Condition of diesel tank cover prior to fuel delivery.	K. Bergl
IMG_0044.JPG	Tank vent stacks.	K. Bergl
IMG_0045.JPG	Tank vent stacks and tank covers prior to fuel delivery.	K. Bergl
IMG_0046.JPG	Fuel truck: Trailer identifier	K. Bergl
IMG_0048.JPG	RUL tank spill bucket and fill pipe gasket after refueling to demonstrate the condition of the gasket.	K. Bergl
IMG_0049.MOV	RUL tank spill bucket and fill pipe gasket after refueling to demonstrate the condition of the gasket.	K. Bergl