



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_2025_0626_002
Inspection Date(s):	6/26/2025
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:	Maverik, Inc.
Facility Name:	Maverik #5295
Facility Physical Location:	525 Wooten Road, Colorado Springs, CO, 80815

Inspector and Approval

Alyson Skeens	Inspector	
Field Inspector Name	Title	Signature
Scott Patefield	Branch Manager	
Name of Approving Official	Title	Signature

FACILITY INSPECTION DETAILS AND OBSERVATIONS

General Facility Information			
Gasoline Dispensing Facility			
Facility Name:	Maverik #5295	Parent Company Name:	Maverik, Inc.
AIRS-ID:	None	CAA Permit (if any):	This facility does not have a CAA permit, APEN, or APEN Exempt memo on file
Primary Facility Representative & Title:	Mark Stewart Sr. Environmental Engineer	On-site Facility Representative & Title:	Terri Howells, Store Manager
Facility Contact Phone/Email:	801-438-4884 Mark.Stewart@maverik.com		
Facility Address:	525 Wooten Rd, Colorado Springs, CO 80915		
Enforcement and Compliance History:	None		
Fuel Delivery Company			
Trucking Company Name:	Solar Transport Company		
Truck Identifier:	USDOT 231451	Trailer Identifier:	257250
Fuel Supply Company Representative & Title:	Tyler DePhillips Senior Director of Operations	Driver Name:	Brendan Walter
Fuel Supply Company Contact Phone/Email:	515-706-3408 tyler.dephillips@solartransport.com		
Fuel Supply Company Address:	1150 Locust Street, Sute 301, Des Moines, IA 50309		
Enforcement and Compliance History:	None		

General Inspection Information				
Inspection Number/ID:	R8_CAA_2025_0626_002		Inspection Date	6/26/2025
Inspector(s):	Katelyn Bergl (EPA) Alyson Skeens (EPA) Chris Andrade (EPA)		Arrival/Departure Time	8:30 AM 9:20 AM
Time Inspector Presented Credentials:	8:30 AM		Administrative Inspection Items:	☒ Announced ☐ Unannounced
Permission to Enter Facility Granted? If Yes, by whom? If No, explain.	☒ Yes ☐ No			☒ CBI Procedures Discussed
	Terri Howells, Store manager			☒ SBREFA Form Provided
Photographer Name:	Katelyn Bergl (EPA) Alyson Skeens (EPA) Chris Andrade (EPA)		Photograph Range:	See APPENDIX A: Photograph and Video Log
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 inspectors 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. An Air Pollutant Emissions Notice, or APEN, has not been submitted to the Colorado Department of Public Health and Environment's (CDPHE) Air Pollution Control Division (APCD). Typically, APENs are required upon startup and must be updated every 5 years for this source category. 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. During simultaneous regular unleaded fuel (RUL) and diesel fuel tank filling, vapors were observed from the RUL tank's pressure/vacuum-style (P/V) vent.			

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		☐ $\geq 10,000$ gallons per month and < 100,000 gallons per month		☒ $\geq 100,000$ gallons per month		
Date Applicable Throughput Category Was Exceeded:			Based on records provided since July 2020, the facility exceeded the 100,000 gallons per month throughput threshold on or before June 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 July 2020 – June 2025 were provided via email by Mark Stewart on June 26, 2025.			
☒ Last 12-month rolling throughput calculation			Provided along with 5-year throughput records			
Records: Facilities $\geq 100,000$ 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:	4/2/2024	Results of Last Test:	Fail
			Report Provided: No			
			Tests were performed within the last 3 years.			
☒ 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:	4/2/2024	Results of Last Test:	Fail
			Report Provided: No			
			Tests were performed within the last 3 years.			

Fuel Delivery Truck Compliance (Gasoline Cargo Tanks under NESHAP 6C)			
Fuel Type:	1) Regular Unleaded (RUL) 2) Premium Unleaded (PUL) 3) Diesel	Amount of Fuel Delivered:	1) 3,700 gallons 2) 2,000 gallons 3) 2,300 gallons
Annual Certification Test – Vapor Tightness Testing – EPA Method 27 of appendix A-8 to part 60 of CAA			
Date of Last Test:	March 12, 2025	5-Year Test Record Availability:	☒ Available with truck ☐ Available at office or central loc. ☐ Not Available ☐ Other:
Results of Test:	Pass	Pressure Change, Δp :	Pass, 0.0
		Vacuum Change, Δv :	Pass, 0.0

Fuel Delivery Event Observation: A fuel delivery event was observed by the EPA inspectors. The inspectors used a forward-looking infrared (FLIR) camera to record optical gas imaging (OGI) videos of gasoline vapors, and a toxic vapor analyzer (TVA) to measure gasoline vapor concentrations ¹ . 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	Equipment was observed to be capped and covered prior to fueling.
☒	Connection of fuel and vapor lines prior to fuel transfer	The vapor recovery hose was first connected to the vapor recovery tank and truck header. Next, the fuel hose was connected to the fuel pipe of the tank, and finally the fuel hose was connected to the truck header.
☒	Maintenance of fuel and vapor line connections during fueling event	During simultaneous fueling of the RUL and diesel tanks, vapors were observed with the FLIR from the vapor vents. <i>See</i> FLIR0049. Specifically, emissions were observed from the northern cluster of vapor vents, closest to the store building. There were two vents in this cluster; one was equipped with a P/V-style vent, and the other was not. Based on this observation, the P/V-style vent was likely connected to the RUL tank. Emissions were observed from both vents. <i>See</i> FLIR0051.
☒	Disconnection of fuel and vapor lines after fuel transfer	Hoses were disconnected in the opposite order for which they were connected.
☒	Conditions of Equipment after refueling event	Caps and covers were returned after fueling.

Documents Requested			
Document(s)	Status		Notes
5-year fuel throughput records including previous 12-month fuel throughput calculation	☒ Document(s) Provided ☐ Will Provide After Inspection	☐ Document(s) Denied ☐ Other	
EPA Method 27 for the fuel delivery truck	☒ Document(s) Provided ☐ Will Provide After Inspection	☐ Document(s) Denied ☐ Other	
Most recent NESHAP 6C Performance Tests	☒ Document(s) Provided ☐ Will Provide After Inspection	☐ Document(s) Denied ☐ Other	

¹ The TVA was calibrated using 500 parts per million (ppm) and 10,000 ppm methane gas standards. The methane concentrations recorded on the TVA were then converted to a ppm concentration as propane using a conversion factor of 3. This provides a conservative conversion to propane, using the guidance put forth in EPA's "Frequently Asked Questions (FAQ) for Method 25A". *See* https://www.epa.gov/sites/default/files/2016-08/documents/method25a_faq.pdf.

APPENDIX A: Photograph and Video Log

File Name	Description	Photographer
FLIR0049.mp4	Emissions from vapor vents during simultaneous fueling of diesel and RUL tanks.	C. Andrade
FLIR0050.mp4	Vapor vents.	C. Andrade
FLIR0051.mp4	Emissions from vapor vents from the northern-most cluster of vapor vents	C. Andrade
20250626_144443365_iOS.heic	Cargo Tank Vapor Integrity Test (EPA Method 27) - Tank Unit #257250 for Solar Transport Inc.	K. Bergl