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_004**
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 #5242
Facility Physical Location:	8050 Fountain Mesa Road, Fountain, CO, 80817

Inspector and Approval

Alyson Skeens	Inspector	ALYSON SKEENS Digitally signed by ALYSON SKEENS Date: 2025.09.10 13:52:52 -06'00'
Field Inspector Name	Title	Signature
Scott Patefield	Branch Manager	SCOTT PATEFIELD Digitally signed by SCOTT PATEFIELD Date: 2025.09.05 11:32:50 -06'00'
Name of Approving Official	Title	Signature

FACILITY INSPECTION DETAILS AND OBSERVATIONS

General Facility Information			
Gasoline Dispensing Facility			
Facility Name:	Maverik #5242	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:	Arden Acierdo, Lead
Facility Contact Phone/Email:	801-438-4884 Mark.Stewart@maverik.com		
Facility Address:	8050 Fountain Mesa Rd, Fountain, CO 80817		
Enforcement and Compliance History:	None		
Fuel Delivery Company			
Trucking Company Name:	Solar Transport Company		
Truck Identifier:	251265	Trailer Identifier:	257254
Fuel Supply Company Representative & Title:	Tyler DePhillips Senior Director of Operations	Driver Name:	Mario Robinson
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		

<table>
<tr><th colspan="5">General Inspection Information</th></tr>
<tr><td>Inspection Number/ID:</td><td>R8_CAA_2025_0626_004</td><td>Inspection Date</td><td colspan="2">6/26/2025</td></tr>
<tr><td>Inspector(s):</td><td>Katelyn Bergl (EPA)
Alyson Skeens (EPA)
Chris Andrade (EPA)</td><td>Arrival/Departure Time</td><td>1:00 PM</td><td>2:55 PM</td></tr>
<tr><td>Time Inspector Presented Credentials:</td><td>1:00 PM</td><td rowspan="3">Administrative Inspection Items:</td><td>☒ Announced</td><td>☐ Unannounced</td></tr>
<tr><td rowspan="2">Permission to Enter Facility Granted? If Yes, by whom? If No, explain.</td><td>☒ Yes ☐ No</td><td colspan="2">☒ CBI Procedures Discussed</td></tr>
<tr><td>Arden Acierdo,
Lead</td><td colspan="2">☒ SBREFA Form Provided
☐ Other materials or compliance assistance provided (describe):</td></tr>
<tr><td>Photographer Name:</td><td>Katelyn Bergl (EPA)
Alyson Skeens (EPA)
Chris Andrade (EPA)</td><td>Photograph Range:</td><td colspan="2">See APPENDIX A: Photograph and Video Log</td></tr>
<tr><td>Inspection Narrative:</td><td colspan="4">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.</td></tr>
<tr><td>Areas of Concern:</td><td colspan="4">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. For gasoline dispensing facilities with gasoline throughput greater than 100,000 gallons per month, Items 1(g) and 1(h) of Table 1 of NESHAP 6C apply:

1(g) Pressure/vacuum (PV) vent valves shall be installed on the storage tank vent pipes. The pressure specifications for PV vent valves shall be: a positive pressure setting of 2.5 to 6.0 inches of water and a negative pressure setting of 6.0 to 10.0 inches of water. The total leak rate of all PV vent valves at an affected facility, including connections, shall not exceed 0.17 cubic foot per hour at a pressure of 2.0 inches of water and 0.63 cubic foot per hour at a vacuum of 4 inches of water.

1(h) The vapor balance system shall be capable of meeting the static pressure performance requirement of the following equation:

$P_f = 2e^{-500.887/v}$</td></tr>
</table>

Where:

P_f = Minimum allowable final pressure, inches of water.

v = Total ullage affected by the test, gallons.

e = Dimensionless constant equal to approximately 2.718.

2 = The initial pressure, inches water.

To demonstrate compliance with Items 1(g) and 1(h) of Table 1 of NESHAP 6C, 40 CFR § 63.11120(a) requires that a performance test using Test Procedure TP-201.1E and Test Procedure TP-201.3 is conducted initially and every three years thereafter. The facility most recently conducted both performance tests on September 21, 2024. In an email from Mark Stewart of Maverik on August 5, 2025, Mark stated that "One or more components failed 9/2024 testing. Repairs were made and will be retested in September 2025." The September 2024 test reports were not provided. However, failed performance tests indicate that the facility may not have been continuously complying with Items 1(g) and 1(h) of Table 1 of NESHAP 6C, specifically from the date of the failed performance test until components have been repaired and the repairs have been verified with a subsequent performance test indicating the system complies with the design standards.

3. 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 regular fuel (RUL) fueling, gasoline vapors at a concentration of 3.59% as propane, above the lower explosive limit (LEL), were observed from the RUL fueling spill bucket.
    b. During simultaneous RUL and diesel fuel tank filling, vapors were observed from the pressure/vacuum (P/V) vents.
    c. During and after premium fuel (PUL) fueling, gasoline vapors at a concentration of 3.59% as propane, above the LEL, were observed from the PUL vapor recovery spill bucket

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 July 2020, the facility exceeded the 100,000 gallons per month throughput threshold on or before July 2020.				
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 – July 2025 were provided via email by Mark Stewart on August 4, 2025.				
☒ 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:	9/21/2024	Results of Last Test:	Fail	Report Provided:	No
		In an email from Mark Stewart on August 5, 2025, regarding tests TP-201.1E and TP-201.3, Mr. Stewart stated, "One or more components failed 9/2024 testing. Repairs were made and will be retested in September 2025."					
☒ 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:	9/21/2024	Results of Last Test:	Fail	Report Provided:	No
		In an email from Mark Stewart on August 5, 2025, regarding tests TP-201.1E and TP-201.3, Mr. Stewart stated, "One or more components failed 9/2024 testing. Repairs were made and will be retested in September 2025."					

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) 2,000 gallons 2) 5,000 gallons 3) 1,000 gallons
Annual Certification Test – Vapor Tightness Testing – EPA Method 27 of appendix A-8 to part 60 of CAA			
Date of Last Test:	November 18, 2024	5-Year Test Record Availability:	☒ Available with truck ☐ Available at office or central loc. ☐ Not Available ☐ Other:
Results of Test:	Pass	Pressure Change, Δ p:	Pass, 0.0
		Vacuum Change, Δ v:	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	Inspectors observed one tank for each of the following types of fuel: Regular Unleaded, Diesel, Mid, Premium, Deisel Exhaust Fluid. 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 RUL and PUL fueling, gasoline vapors above the LEL of propane were observed from the vapor balance system equipment using the FLIR and TVA. First, vapors were observed from the RUL fueling spill bucket during RUL fueling. Inspectors also observed liquid accumulated in the bucket, and during fueling movement in the liquid was observed consistent with vapor bubbles passing through liquid and supporting the observation of a leak in the spill bucket. *See* FLIR0053, Images 5-7, and Video 8. The vapors were measured with the TVA, and a concentration of 35,860 parts per million (ppm) as propane, or 3.59%, was recorded near the wall of the spill bucket. This concentration exceeds the LEL of propane of 2.1%. During simultaneous fueling of the RUL and diesel tanks, vapors were observed with the FLIR from the P/V Vents. *See* FLIR0054. Diesel vapors were not recovered by the delivery truck. Since the P/V Vents for the diesel and RUL tanks were clustered together, it was not clear which tank the vapors were attributed to. Vapors were also observed from the PUL vapor recovery spill bucket during and after PUL fueling. Inspectors also observed rusting in the spill bucket. *See* FLIR0055-0056 and Images 2-4. A concentration of 35,930 ppm as propane, or 3.59%, was

[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.

		recorded with the TVA near the wall of the spill bucket.
☒	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/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)	
Most recent NESHAP 6C Performance Tests	☐ Document(s) Provided ☐ Will Provide After Inspection	☐ Document(s) Denied ☒ Other (see notes)	Summary of test results was provided, although test reports had not been provided as of the date of this report.

APPENDIX A: Photograph and Video Log

File Name	Description	Photographer
FLIR0053.mp4	Emissions from the RUL fuel spill bucket during RUL fueling. Movement in the liquid accumulated in the bucket can also be seen.	C. Andrade
FLIR0054.mp4	Emissions from the P/V Vents during RUL and diesel tank fueling. Emissions primarily appear to be coming from the P/V Vent further to the back.	C. Andrade
FLIR0055.mp4	Emissions from the PUL vapor recovery spill bucket during PUL fueling.	C. Andrade
FLIR0056.mp4	Emissions from the PUL vapor recovery spill bucket were observed after PUL fueling was complete and the fuel and vapor hoses had been removed. Although the cap had not been placed back on the vapor recovery pipe, the emissions appeared to be coming from the rim of the spill bucket, consistent with the observations during fueling.	C. Andrade
Image 1 (20250626_201944362_iOS.heic)	Annual Trailer Vapor-Tightness Test Report (EPA Method 27) - Trailer 4J8T04221ST103407/257254 for Solar Transport Inc.	K. Bergl
Image 2 (20250626_204612910_iOS.heic)	PUL Vapor recovery spill bucket w/ extensive rusting.	K. Bergl
Image 3 (20250626_204820844_iOS.heic)	PUL Vapor recovery spill bucket w/ extensive rusting.	K. Bergl
Image 4 (20250626_204823050_iOS.heic)	PUL Vapor recovery spill bucket w/ extensive rusting.	K. Bergl
Image 5 (20250626_205128803_iOS.heic)	RUL fueling spill bucket with liquid accumulation in the bucket.	K. Bergl
Image 6 (20250626_205132211_iOS.heic)	RUL fueling spill bucket with liquid accumulation in the bucket. Erosion of the spill bucket appears to be forming on the left side of the bucket in the image.	K. Bergl
Image 7 (20250626_205138472_iOS.heic)	RUL fueling spill bucket with liquid accumulation in the bucket.	K. Bergl
Video 8 (20250626_205340000_iOS.MOV)	RUL fueling spill bucket with liquid accumulation in the bucket. Video shows disturbances in the liquid, indicating that the spill bucket may not be vapor tight and vapors from the storage tank are escaping through the spill bucket. (Further supported by high TVA readings).	K. Bergl
Image 9 (20250626_205358823_iOS.heic)	RUL Vapor recovery spill bucket w/ extensive rusting	K. Bergl
Image 10 (20250626_205403021_iOS.heic)	RUL Vapor recovery spill bucket w/ extensive rusting	K. Bergl
Image 11 (20250626_205404323_iOS.heic)	RUL Vapor recovery spill bucket w/ extensive rusting	K. Bergl