REGION 8
DENVER, CO 80202

INSPECTION REPORT

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_0911_01**
Inspection Date(s):	September 11, 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:	EG America, LLC / Mini Mart, Inc. d/b/a "Loaf N Jug" ("Loaf N Jug")
Facility Name:	Loaf N Jug #084
Facility Physical Location: (street address, building/unit #)	1104 Pueblo Blvd Way
(city, state, zip code):	Pueblo, CO 81005

Inspector and Approval

Katelyn Bergl	Inspector	KATELYN BERGL Digitally signed by KATELYN BERGL Date: 2024.11.19 17:36:08 -07'00'
Field Inspector Name	Title	Signature
Scott Patefield	Branch Manager	SCOTT PATEFIELD Digitally signed by SCOTT PATEFIELD Date: 2024.11.19 16:03:57 -07'00'

FACILITY INSPECTION DETAILS AND OBSERVATIONS

General Facility Information			
Gasoline Dispensing Facility			
Facility Name:	Loaf N Jug #084	Parent Company Name:	Loaf N Jug
AIRS-ID:	101-1145 -001	CAA Permit (if any):	Permit Exempt Number 08PB0753S.XP
Primary Facility Representative & Title:	Theodore Bezel, Tanknology Compliance Manager Martin Hilfinger, EG America, LLC. Vice President Environmental Affairs	On-site Facility Representative & Title:	Benjamin Olivarez, Assistant Manager
Facility Contact Phone/Email:	tbezel@tanknology.com Martin.Hilfinger@eg-america.com	On-site Contact Phone/Email:	N/A
Facility Address:	1104 Pueblo Blvd Way, Pueblo, CO 81005		
Enforcement and Compliance History:	None		
Fuel Delivery Company			
Fuel Supply Company Name:	Groendyke Transport	Trucking Company Name (if different):	Suncor Energy
Truck Identifier:	8501	Trailer Identifier:	14-1338
Fuel Supply Company Representative & Title:	Chris Pape Vice President of Safety	Driver Name:	Thomas Sharp
Fuel Supply Company Contact Phone/Email:	Cpape@groendyke.com		
Fuel Supply Company Address:	1833 E Platteville Blvd, Pueblo West, CO 81007		
Enforcement and Compliance History:	None		

General Inspection Information				
Inspection Number/ID:	**R8_CAA_2024_0911_01**	Inspection Date	9/11/2024	
Inspector(s):	Katelyn Bergl (EPA)	Arrival/Departure Time	12:40 PM	1:28 PM
Time Inspector Presented Credentials:	12:42 PM	Administrative Inspection Items:	☒ Announced	☐ Unannounced
Permission to Enter Facility Granted? If Yes, by whom? If No, explain.	☒ Yes ☐ No Benjamin Olivarez		☒ CBI Procedures Discussed ☒ SBREFA Form Provided ☐ Other materials or compliance assistance provided (describe):	
Photographer Name:	Katelyn Bergl	Photograph Range:	MOV_3533 - 3534; IMG_0072 - 0086	
Weather & Other General Site Observations:	Mostly sunny, 90 deg F, winds 8 mph SE			
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:** For gasoline dispensing facilities with gasoline throughput greater than 100,000 gallons per month, Item 1(g) of Table 1 of NESHAP 6C applies: *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.* To demonstrate compliance with Item 1(g) of Table 1 of NESHAP 6C, 40 CFR § 63.11120(a) requires that a performance test using Test Procedure TP-201.1E is conducted initially and every three years thereafter. The facility most recently conducted a TP-201.1E performance test on June 25, 2024. The test report indicates that the tested component initially failed the negative leak rate and cracking pressure test. The component was replaced and retested the same day as the initial test and subsequently passed the performance test. The initial failing results			

	indicate that the facility may not have been continuously complying with Item 1(g) of Table 1 of NESHAP 6C.

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 on or before October 2019.			
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 Theodore Bezel on September 11, 2024.				
☒ Last 12-month rolling throughput calculation available	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: 6/25/2024	Results of Last Test: (Pass) / Fail	Report Provided: (Yes) / No	The report indicates that the component initially failed the negative leak rate and cracking pressure test. The component was replaced and retested the same day as the initial test and subsequently passed the performance test. This performance test was conducted within the past three 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: 5/22/2024	Results of Last Test: (Pass) / Fail	Report Provided: (Yes) / No	Report indicates passing performance test. This performance test was conducted within the past three years.	

Fuel Delivery Truck Compliance (Gasoline Cargo Tanks under NESHAP 6C)			
Fuel Type:	1) Regular Unleaded (RUL) 2) Premium	Amount of Fuel Delivered:	1) 3,000 gallons 2) 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:	04/01/2024	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 visible from regular unleaded (RUL) fueling spill bucket prior to cap removal or fueling. Liquid was visible in the spill bucket prior to fueling and could have been the source of vapors.
☒	Connection of fuel and vapor lines prior to fuel transfer	
☒	Maintenance of fuel and vapor line connections during fueling event	A small amount of vapors was observed from RUL fueling spill bucket during RUL fueling. These vapors could have come from leftover liquid/gasoline in the spill bucket present prior to fueling.
☒	Disconnection of fuel and vapor lines after fuel transfer	
☒	Conditions of Equipment after refueling event	

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)	

APPENDIX A: Photograph and Video Log

File Name	Description	Photographer
MOV_3533.mp4	Vapors visible from RUL fueling spill bucket prior to cap removal or fueling. Liquid was visible in the spill bucket prior to fueling and could have been the source of vapors.	K. Bergl
MOV_3534.mp4	Small amount of vapors observed from RUL fueling spill bucket during RUL fueling. Possibly from leftover liquid/gasoline in the spill bucket present prior to fueling.	K. Bergl
IMG_0072.JPG	Vapor vent stacks for the RUL, premium, and diesel storage tanks located on top of the canopy structure, as well as the general refueling area.	K. Bergl
IMG_0074.JPG	Regular unleaded (RUL) and premium fuel tank fill and vapor recovery equipment.	K. Bergl
IMG_0075.JPG	Regular unleaded (RUL), premium, and diesel fuel tank fill and vapor recovery equipment.	K. Bergl
IMG_0076.JPG	Regular unleaded (RUL) fuel tank fill and vapor recovery equipment.	K. Bergl
IMG_0077.JPG	Premium tank fill and vapor recovery equipment.	K. Bergl
IMG_0078.JPG	Diesel tank fill and vapor recovery equipment.	K. Bergl
IMG_0079.JPG	General refueling area prior to fuel delivery.	K. Bergl
IMG_0080.JPG	General refueling area prior to fuel delivery.	K. Bergl
IMG_0081.JPG	Fuel truck fuel delivery header system.	K. Bergl
IMG_0082.JPG	Fuel truck: Trailer identifier	K. Bergl
IMG_0083.JPG	Fuel truck: Truck identifier	K. Bergl
IMG_0084.JPG	EPA Method 27 Certificate for truck.	K. Bergl
IMG_0085.JPG	EPA Method 27 Certificate for truck.	K. Bergl
IMG_0086.JPG	EPA Method 27 Certificate for truck.	K. Bergl