



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_003
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:	Circle K Stores, Inc.
Facility Name:	Circle K #2703291
Facility Physical Location:	6135 N Carefree Circle, Colorado Springs, CO, 80922

Inspector and Approval

Chris Andrade	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:	Circle K #2703291	Parent Company Name:	Circle K Stores, Inc.
AIRS-ID:	041-2195	CAA Permit (if any):	Permit Exempt Number 21EP05245S.XP
Primary Facility Representative & Title:	Kyle Kobashi, Environmental Compliance Specialist – Rocky Mountain	On-site Facility Representative & Title:	Dee T., Sales Lead
Facility Contact Phone/Email:	kyle.kobashi@circlek.com		
Facility Address:	6135 N Carefree Circle, Colorado Springs, CO 80922		
Enforcement and Compliance History:	None		
Fuel Delivery Company			
Trucking Company Name:	Circle K Stores, Inc.		
Truck Identifier:	43100	Trailer Identifier:	3416
Fuel Supply Company Representative & Title:	Jordan Kingery, Fuel Manager – Rocky Mountain Business Unit	Driver Name:	Eric Holmes
Fuel Supply Company Contact Phone/Email:	jkingery@circlek.com		
Fuel Supply Company Address:	5500 S Quebec St., Suite 100, Greenwood Village, CO 80111		
Enforcement and Compliance History:	None		

General Inspection Information				
Inspection Number/ID:	R8_CAA_2025_0626_003	Inspection Date	6/26/2025	
Inspector(s):	Katelyn Bergl (EPA) Alyson Skeens (EPA) Chris Andrade (EPA)	Arrival/Departure Time	9:56 AM	10:46 AM
Time Inspector Presented Credentials:	10:00 AM	Administrative Inspection Items:	☒ Announced	☐ Unannounced
Permission to Enter Facility Granted? If Yes, by whom? If No, explain.	☒ Yes ☐ No		☒ CBI Procedures Discussed	
	Dee T., Sales Lead		☒ SBREFA Form Provided	
Photographer Name:	Katelyn Bergl (EPA) Alyson Skeens (EPA) Chris Andrade (EPA)	Photograph Range:	☐ Other materials or compliance assistance provided (describe):	
			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: - 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: - Gasoline vapors at concentrations above the lower explosive limit (LEL) of propane were observed from the vapor recovery hose during premium fuel (PUL) fueling. - Standing water in the PUL vapor recovery spill bucket may have caused a malfunction in the poppet valve sealing mechanism for the vapor recovery pipe adapter. An audible continuous hiss indicated that the valve was not forming a proper seal. During the inspection, the fuel truck driver removed some liquid from the spill bucket readjusted the poppet valve. The hissing sound stopped after this adjustment.			

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 2020, the facility exceeded the 100,000 gallons per month throughput threshold on or before January 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 January 2020 – June 2025 were provided via email by Kyle Kobashi on June 24, 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:	5/14/2024	Results of Last Test:	Pass	Report Provided:	Yes
☒ 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:	5/14/2024	Results of Last Test:	Pass	Report Provided:	Yes

Fuel Delivery Truck Compliance (Gasoline Cargo Tanks under NESHAP 6C)			
Fuel Type:	1) Regular Unleaded (RUL) 2) Premium	Amount of Fuel Delivered:	1) 7,000 gallons 2) 2,000 gallons
Annual Certification Test – Vapor Tightness Testing – EPA Method 27 of appendix A-8 to part 60 of CAA			
Date of Last Test:	2/12/25	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, -0.75
		Vacuum Change, Δv :	Pass, -1.00

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 concentrations¹. 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. Standing liquid was observed in the PUL vapor recovery spill bucket and may have caused a malfunction in the poppet valve sealing mechanism for the vapor recovery pipe adapter. An audible continuous hiss indicated that the valve was not forming a proper seal. <i>See</i> Img_0294-0295. During the inspection, prior to re-fueling the tanks, the fuel truck driver removed some liquid from the spill bucket and readjusted the poppet valve. The hissing sound stopped after this adjustment. <i>See</i> Img_0296. Standing liquid was also observed in the RUL fuel spill bucket.
☒	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 fueling of the PUL tank, gasoline vapors were observed with the FLIR and TVA. The vapors were observed to be coming from the vapor recovery hose, near the interface of the hose and the vapor recovery elbow. <i>See</i> FLIR0052. The vapors were measured with the TVA, and a concentration of 33,700 parts per million (ppm) as propane, or 3.37%, was recorded. This concentration exceeds the LEL of propane of 2.1%.
☒	Disconnection of fuel and vapor lines after fuel transfer	Hoses were disconnected in the opposite order for which they were connected. After disconnecting hoses, a reading of 3,000 ppm as propane was observed at the premium vapor bucket with the TVA.
☒	Conditions of Equipment after refueling event	Caps and covers were returned after fueling.

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.

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
FLIR0052.mp4	Emissions from the premium vapor line hose	C. Andrade
Img_0294.heic	PUL Vapor recovery pipe. Spill bucket has accumulated liquid, and the spring mechanism on the poppet cap is malfunctioning, staying in the lowered position without the vapor recovery hose attached and allowing vapors to enter or exit the tank.	K. Bergl
Img_0295.mov	PUL Vapor recovery pipe. Spill bucket has accumulated liquid, and the spring mechanism on the poppet cap is malfunctioning, staying in the lowered position without the vapor recovery hose attached and allowing vapors to enter or exit the tank. Air intrusion into the pipe is audible in the video.	K. Bergl
Img_0296.mov	PUL Vapor recovery pipe, after the delivery driver removed some liquid from the spill bucket. He also adjusted the poppet spring to attempt to return it to a sealed position, and the hissing noise was no longer audible.	K. Bergl