



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_0909_02
Inspection Date(s):	September 9, 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 #3104
Facility Physical Location: (street address, building/unit #)	725 W Northern Ave
(city, state, zip code):	Pueblo, CO 81004

Inspector and Approval

<u>Katelyn Bergl</u>	<u>Inspector</u>	<u></u>
Field Inspector Name	Title	Signature
<u>Scott Patefield</u>	<u>Branch Manager</u>	<u></u>

FACILITY INSPECTION DETAILS AND OBSERVATIONS

General Facility Information			
Gasoline Dispensing Facility			
Facility Name:	Alta Convenience #3104	Parent Company Name:	CF Altitude LLC
AIRS-ID:	101-0186-001	CAA Permit (if any):	Permit Exempt Number 02PB0391S.XP
Primary Facility Representative & Title:	ODEANA Wilson Corporate Environmental Manager	On-site Facility Representative & Title:	Cole Barlow, Assistant Manager
Facility Contact Phone/Email:	Odeana.Wilson@unitedpacific.com	On-site Contact Phone/Email:	N/A
Facility Address:	725 W Northern Ave, Pueblo, CO 81004		
Enforcement and Compliance History:	None		
Fuel Delivery Company			
Fuel Supply Company Name:	World Kinect Corporation	Trucking Company Name (if different):	Same
Truck Identifier:		Trailer Identifier:	0986
Fuel Supply Company Representative & Title:	Ron Browning Operations Manager	Driver Name:	Fermin Moreno
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_0909_02	Inspection Date	9/9/2024	
Inspector(s):	Katelyn Bergl (EPA)	Arrival/Departure Time	5:39 PM	6:55 PM
Time Inspector Presented Credentials:	5:45 PM	Administrative Inspection Items:	☒ Announced	☒ Unannounced
Permission to Enter Facility Granted? If Yes, by whom? If No, explain.	☒ Yes ☐ No		☒ CBI Procedures Discussed	
	Cole Barlow		☒ SBREFA Form Provided	
			☐ Other materials or compliance assistance provided (describe):	
Photographer Name:	Katelyn Bergl	Photograph Range:	IMG_0014 – IMG_0017 MOV_3514 - 3516	
Weather & Other General Site Observations:	Mostly cloudy, 80 deg F, winds 9 mph S			
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 tank and associated vapor system were not vapor tight during the fuel delivery event. The following emissions were observed during the fuel delivery portion of EPA's inspection: 1) During fueling of the RUL tank, the vapor recovery hose valve between the hose and the truck was left in the closed position, causing vapors to escape from the tank vents rather than be recovered into the truck. The driver was notified of the emissions and subsequently opened the valve, at which point the vapors were no longer observed coming out of the tank vents. 2) Vapors were observed from the vapor recovery header of the fuel truck after the cap had been removed and before fueling began.			

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:		Records indicate >10,000 gpm since at least 2019
Records		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

Fuel Delivery Truck Compliance (Gasoline Cargo Tanks under NESHAP 6C)			
Fuel Type:	1) Regular Unleaded (RUL) 2) Premium	Amount of Fuel Delivered:	1) 7,200 gallons 2) 900 gallons
Annual Certification Test – Vapor Tightness Testing – EPA Method 27 of appendix A-8 to part 60 of CAA			
Date of Last Test:	01/01/2024	5-Year Test Record Availability:	☒ Available with truck ☐ Available at office or central location ☐ 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	Equipment capped and covered prior to fuel delivery. Vapors were observed from the vapor recovery header of the fuel truck after the cap had been removed and before fueling began.
☒	Connection of fuel and vapor lines prior to fuel transfer	Emissions were observed from the vapor recovery header on the truck after the cap was removed and prior to vapor recovery hose connection (MOV_3516).

☒	Maintenance of fuel and vapor line connections during fueling event	During fueling of RUL tank, the vapor recovery hose valve between the hose and the truck was left closed, causing vapors to escape from the tank vents rather than be recovered into the truck. The driver was notified and opened the valve, at which point the vapors were no longer observed coming out of the tank vents.
☒	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 include 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)

APPENDIX A: Photograph and Video Log

File Name	Description	Photographer
MOV_3514.mp4	Pre-fuel equipment scan	K. Bergl
MOV_3515.mp4	Vapors were observed from the vapor recovery header of the fuel truck after the cap had been removed and before fueling began.	K. Bergl
MOV_3516.mp4	Large plume of continuous vapors observed from P/V Vapor vents during RUL fueling. The truck-side valve on the vapor recovery hose was left in the shut position during fueling, preventing vapors from being recovered by the truck and forcing the vapors out of the vent pipe. As soon as the inspector pointed this out to the driver, the driver opened the valve and began recovering the vapors, and the vapors were no longer visible.	K. Bergl
IMG_0014.JPG	Fuel truck: Trailer identifier	K. Bergl
IMG_0015.JPG	Condition of tank covers prior to fuel delivery.	K. Bergl
IMG_0016.JPG	Vapor Vents: 1 each for RUL and Premium fuel types. RUL and Premium are Pressure/Vapor-Type vents.	K. Bergl
IMG_0017.JPG	Fuel truck: Trailer identifier	K. Bergl