



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_0910_04
Inspection Date(s):	September 10, 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 #3113
Facility Physical Location: (street address, building/unit #)	723 S Pueblo Blvd
(city, state, zip code):	Pueblo, CO 81005

Inspector and Approval

<u>Katelyn Bergl</u> Field Inspector Name	<u>Inspector</u> Title	<u>KATELYN BERGL</u> Digitally signed by KATELYN BERGL Date: 2024.11.19 17:34:54 -07'00' Signature
<u>Scott Patefield</u>	Branch Manager	<u>SCOTT PATEFIELD</u> Digitally signed by SCOTT PATEFIELD Date: 2024.11.19 15:59:59 -07'00'

FACILITY INSPECTION DETAILS AND OBSERVATIONS

General Facility Information			
Gasoline Dispensing Facility			
Facility Name:	Alta Convenience #3113	Parent Company Name:	CF Altitude LLC
AIRS-ID:	101-0184-001	CAA Permit (if any):	Permit Exempt Number 02PB0390S.XP
Primary Facility Representative & Title:	ODEANA Wilson Corporate Environmental Manager	On-site Facility Representative & Title:	Brenda Mahoney, Assistant Manager
Facility Contact Phone/Email:	Odeana.Wilson@unitedpacific.com	On-site Contact Phone/Email:	N/A
Facility Address:	723 S Pueblo Blvd, Pueblo, CO 81005		
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_0910_04	Inspection Date	9/10/2024	
Inspector(s):	Katelyn Bergl (EPA)	Arrival/Departure Time	4:30 PM	6:35 PM
Time Inspector Presented Credentials:	4:30 PM	Administrative Inspection Items:	☒ Announced	☐ Unannounced
Permission to Enter Facility Granted? If Yes, by whom? If No, explain.	☒ Yes ☐ No		☒ CBI Procedures Discussed	
	Brenda Mahoney		☒ SBREFA Form Provided	
			☐ Other materials or compliance assistance provided (describe):	
Photographer Name:	Katelyn Bergl	Photograph Range:	MOV_3530 - 3532; IMG_0050 - 0069	
Weather & Other General Site Observations:	Overcast, 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 following are areas of concern identified during the inspection or records review: The fuel delivery driver did not engage the cam-lock gasket of the fuel line during premium fueling, causing vapor leak and liquid gasoline spillage into the spill bucket. As soon as this was pointed out, the driver engaged the cam-lock and the leakage and bubbling that was observed ceased.			

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 gallons per month 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 3) E-85 4) Diesel	Amount of Fuel Delivered:	1) 4400 gallons 2) 1600 gallons 3) 1100 gallons 4) 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 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	
☒	Connection of fuel and vapor lines prior to fuel transfer	The fuel delivery driver did not engage the cam-lock gasket of the fuel line during premium fueling, causing vapor leak and liquid gasoline spillage into the spill bucket. As soon as this was pointed out, the driver engaged the cam-lock and the leakage and bubbling that was observed ceased. (IMG_0064 and IMG_0066-0067).
☒	Maintenance of fuel and vapor line connections during fueling event	Vapors were observed from the tank vents during regular unleaded (RUL) and premium filling. The driver reported that there was no vapor recovery system installed at this facility, so vapors were not recovered during fueling and were consequently vented simultaneously from the tank vent pipes, RUL spill bucket, premium spill bucket, and an adjacent automatic tank gauging (ATG) spill bucket (MOV_3530 and MOV_3531).
☒	Disconnection of fuel and vapor lines after fuel transfer	
☒	Conditions of Equipment after refueling event	Vapors were observed from the ATG system spill bucket and the RUL spill bucket after all fill pipes and spill buckets had been capped and covered post-fuel delivery (MOV_3532).

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)

File Name	Description	Photographer
MOV_3530.mp4	Vapors were observed from tank vents during RUL and premium filling. The driver reported that there was no vapor recovery equipment, so vapors were not recovered during fueling and vented from the vent pipes, RUL spill bucket, premium spill bucket, and an adjacent ATG spill bucket.	K. Bergl
MOV_3531.mp4	Vapors continued to be observed from the adjacent ATG spill bucket while the diesel tank was being filled, after the RUL and premium tanks were filled, capped, and covered.	K. Bergl
MOV_3532.mp4	Vapors continued to be observed from the adjacent ATG spill bucket and the RUL spill bucket, after all tanks were filled, capped, and covered.	K. Bergl
IMG_0050.JPG	Condition of tank covers prior to fuel delivery. There was an active construction project adjacent to the tank covers to repair or remove old fuel storage tanks.	K. Bergl
IMG_0051.JPG	Condition of first RUL tank cover prior to fuel delivery.	K. Bergl
IMG_0052.JPG	Condition of second RUL tank cover prior to fuel delivery.	K. Bergl
IMG_0053.JPG	Condition of diesel tank cover prior to fuel delivery.	K. Bergl
IMG_0054.JPG	Condition of E-85 tank cover prior to fuel delivery.	K. Bergl
IMG_0055.JPG	Condition of premium tank cover prior to fuel delivery.	K. Bergl
IMG_0056.JPG	Tank vent stacks.	K. Bergl
IMG_0057.JPG	Tank vent stacks.	K. Bergl
IMG_0058.JPG	Condition of the first RUL tank spill bucket prior to fuel delivery. The bucket was rusted and in poor condition.	K. Bergl
IMG_0059.JPG	Condition of the second RUL tank spill bucket prior to fuel delivery. The bucket was filled with liquid prior to fuel delivery.	K. Bergl
IMG_0060.JPG	Condition of the second RUL tank spill bucket prior to fuel delivery. The bucket was filled with liquid prior to fuel delivery.	K. Bergl
IMG_0061.JPG	Condition of the diesel tank spill bucket prior to fuel delivery. The bucket was filled with liquid prior to fuel delivery.	K. Bergl
IMG_0062.JPG	Condition of the E-85 tank spill bucket prior to fuel delivery. The bucket was filled with liquid prior to fuel delivery.	K. Bergl
IMG_0063.JPG	Condition of the premium tank spill bucket prior to fuel delivery. The bucket was filled with liquid prior to fuel delivery.	K. Bergl

IMG_0064.MOV	Video capturing vapor bubbles coming up through the pre-existing liquid in the spill bucket during the fueling of the second RUL tank.	K. Bergl
IMG_0065.JPG	Fuel truck: Trailer identifier	K. Bergl
IMG_0066.MOV	Video capturing liquid fuel spilling into the pre-existing liquid in the spill bucket during the fueling of the premium tank, due to the cam-lock not being engaged during fueling.	K. Bergl
IMG_0067.MOV	Video capturing vapor bubbles coming up through the pre-existing liquid in the spill bucket after the fueling of the premium tank.	K. Bergl
IMG_0068.JPG	Method 27 certificate for the truck	K. Bergl
IMG_0069.JPG	Method 27 certificate for the truck	K. Bergl