



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

January 15, 2008

RE: SUNOCO PARTNERS, YOUNGSTOWN  
MAHONING COUNTY  
OHD 080 246 817  
SMALL QUANTITY GENERATOR (SQG)  
NOTICE OF VIOLATION / RTC

Mr. Ron O'Toole  
Sunoco Partners Marketing and Terminals LP  
5733 Butler Street  
Pittsburgh, PA 15201

Dear Mr. O'Toole:

On December 7, 2007, Robert Almquist and I performed a compliance evaluation inspection (CEI) of the Sunoco Partners Youngstown Terminal located at 6331 Southern Blvd. in Youngstown, Ohio. The Youngstown Terminal facility was inspected to determine compliance with Ohio's hazardous waste laws and regulations as found in the Ohio Revised Code and the Ohio Administrative Code ("ORC" and "OAC" respectively). Mr. Almquist and I represented the Ohio EPA, Division of Hazardous Waste Management (DHWM) and you represented the facility.

This facility was described as a bulk distribution terminal. Product (gasoline and diesel fuels) arrives via pipeline from the Boardman Terminal. All product is shipped out via tanker truck. Fuel additives (ethanol and gasoline additive) are brought in by truck and blended on site. At the time of the inspection the facility was a conditionally exempt small quantity generator (CESQG). Typically it is anticipated this facility operates as a CESQG. However, pipeline and tank maintenance or repair could cause the facility to episodically be a large quantity generator (LQG). Typical waste codes are D001 and D018 hazardous wastes.

Subsequent to the inspection you provided analytical documentation from a fuel additive release and a facility plan drawing.

## VIOLATION

1. **OAC 3745-273-14(E) Labeling/Marking of Universal waste Lamps:** You failed to label "Universal waste lamps" or the containers in which they were stored. These spent lamps were located in the garage building. A link to "Universal Waste" guidance found at:  
[http://www.epa.state.oh.us/dhwm/pdf/New\\_Universal\\_Waste\\_Guidance.pdf](http://www.epa.state.oh.us/dhwm/pdf/New_Universal_Waste_Guidance.pdf).

This violation was abated when the box containing the lamps was properly labeled.

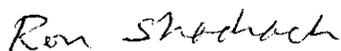
SUNOCO PARTNERS  
JANUARY 15, 2008  
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The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image by implementing pollution prevention programs. More information about pollution prevention, including fact sheets and U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92/088) may be obtained by contacting the Ohio EPA Pollution Prevention Section at (614) 644-3469 or online at: <http://www.epa.state.oh.us/ocapp/ocapp.html>.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link: <http://www.epa.state.oh.us/dhwm/listserv.html>. You can find copies of the rules and other information on the DHWM's web page at: <http://www.epa.state.oh.us/dhwm>.

Enclosed are a CESQG Checklist, a Waste Activity Summary Sheet and RCRA Identification form completed for this inspection. If you have any questions, you may contact me at (330) 963-1146 or at: [ron.shadrach@epa.state.oh.us](mailto:ron.shadrach@epa.state.oh.us).

Sincerely,



Ronald J. Shadrach  
Environmental Specialist  
Division of Hazardous Waste Management

Enclosures

RJS:ddw

ec: Frank Popotnik, DHWM, NEDO  
Harry Sarvis, DHWM, CO

**NOTICE:** *Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.*

Ohio Environmental Protection Agency  
**RCRA SUBTITLE C SITE  
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to  
[tammy.mcconnell@epa.state.oh.us](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy  
McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD 080 <sup>5</sup> 246 817								
3. Site Name	Name: Sunoco Partners Marketing and Terminals LP					Website: (Optional)			
4. Site Location Information	Street Address: 6331 Southern Blvd.								
	City, Town, or Village: Youngstown					State: OH			
	County Name: Mahoning					Zip Code: 44512			
5. Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>									
7. Facility Representative  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: Ronald			MI: J	Last Name: O'Toole				
	Phone Number: 412-784-3472				Phone Number Extension:				
	E-Mail Address: <a href="mailto:rotoole@sunocologistics.com">rotoole@sunocologistics.com</a>								
	Fax Number: 412-784-3465				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:								
	State:				Country:		Zip Code:		
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Sunoco Partners Marketing & Terminals LP					Date Became Owner (mm/dd/yyyy):			
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: 5733 Butler Street								
	City, Town or Village: Pittsburgh				Owner Phone #:				
	State: Pa				Country:		Zip Code: 15201		
	Name of Site's Operator:					Date Became Operator (mm/dd/yyyy):			
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box:								
	City, Town or Village:				Operator Phone #:				
	State:				Country:		Zip Code:		
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Not Regulated				<input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))			
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
Check all boxes below that apply for each of the three types of facilities above		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	<b>Managed</b>	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.			
D001	D018		
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
Announced	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments: Facility is episodic large quantity generator.
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Ron Shadrach, DHWM, NEDO		Robert Almquist, DHWM, NEDO	12/7/2007 10:30
14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.			
Signature of Owner, Operator, or an Authorized Representative		Name and Title (Print)	Date (mm/dd/yyyy)

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤ 100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.  
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.  
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

**WASTE EVALUATION**

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11]    Yes       No       N/A  

**GENERATOR CLASSIFICATION**

2. Does the generator produce <100 kg. of hazardous waste per month?    Yes       No       N/A     
 [conditionally exempt small quantity generator ("CESQG")]

*NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.*

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]    Yes       No       N/A  

**TREATMENT OF HAZARDOUS WASTE**

4. Does the generator treat hazardous waste in a:

a. Container that meets 3745-66-70 to 3745-66-77?    Yes       No       N/A  

b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?    Yes       No       N/A  

c. Drip pads that meet 3745-69-40 to 3745-69-45?    Yes       No       N/A  

d. Containment building that meets 3745-256-100 to 3745-256-102?    Yes       No       N/A  

*NOTE: Complete appropriate checklist for each unit.*

*NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.*

*NOTE: If waste is treated to meet LDRs, use LDR checklist.*

**REMARKS**

Facility is an episodic large quantity generator but was CESQG at time of this inspection.

Process, Waste, and Pollution Prevention Summary for:

Sunoco, Youngstown Terminal, OHD 089246 817, CESQG, 12-07-07 inspection

#	Process generating the waste	Waste details	On-site management	Off-site management	Current pollution prevention	Possible pollution prevention
1	Cleanup of drips and drabs (spill residue)	Fuels – D001, D018 (rags, absorbents).	55-gallon drum.	hazardous waste to Pollution Control Industries, (IND000646943)	Minimization & maintenance	
2	Product tank bottoms	Fuel/water D001, D018 (off spec fuel)	Generally none. Direct pumped.	Hazardous waste. Sent for energy recovery/ reclamation		
3	Releases and Pipeline maintenance	Water, fuel additives, fuel D001, D018	Containerization or Direct pumped or use Frac tank.	Hazardous waste or energy recovery.		
4	Lighting	UW lamps – fluorescents and HID	Boxed, labeled	Centralization for recycling		
5	Maintenance equipment	Used oil from tractor and maintenance equipment	55- gallon drum	Used oil hauler		
6						
7						
8						
9						
10						
11						