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State of Ohio Environmental Protection Agency

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P.O. Box 1049  
Columbus, OH 43216-1049

**Certified Mail #91 7108 2133 3932 4449 8614**

June 5, 2009

Don Wells, Complex Terminal Manager  
Sunoco Logistics Columbus East Terminal  
3499 West Broad Street  
Columbus, OH 43204

**Re: Sunoco Columbus East Terminal  
NPDES permit: 4IN00021**

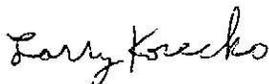
Dear Mr. Wells:

Attached is the Reconnaissance Inspection Report for the Sunoco Columbus East Terminal located at 3499 West Broad Street and operating under NPDES permit 4IN00021.

There is no written response required for this inspection report. However, it should be noted that any near- future BTEX violations at outfall -001 will be considered a failure to comply with the NPDES permit's "Compliance Schedule".

Should you have any questions, please call me at 614-728-3846.

Sincerely,



Larry Korecko  
Environmental Specialist  
Compliance and Enforcement  
Division of Surface Water  
Central District Office

c: Dayu Zhang, Sunoco

LK/nsm Sunoco Eol East Term RI cover letter 5-09

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

# NPDES Compliance Inspection Report

## A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
41N00021	OH0007641	05/14/2009	R	S	2

Watershed: Scioto River

## B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Sunoco Logistics- Columbus East Terminal 3499 West Broad Street Columbus, Ohio 43204		06/01/06
	Exit Time	Permit Expiration Date
		05/31/11

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Don Wells Complex Terminal Manager	614-274-8454
Dayu Zhang Environmental Specialist	419-698-7442
Name, Address and Title of Responsible Official	Phone Number
Don Wells, Complex Terminal Manager 3499 W. Broad Street, Columbus, Ohio 43204	614-274-8454

## C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>N/A</u> Pretreatment
<u>S</u> Records/Reports	<u>N</u> Laboratory	<u>M*</u> Compliance Schedules
<u>S*</u> Operations & Maintenance	<u>M*</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S*</u> Facility Site Review	<u>S</u> Sludge Storage/Disposal	<u>    </u> Other
<u>N/A</u> Collection System		

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

## D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

- Hopefully with the new set up of activated carbon bags following the oil-water separator at outfall -001 and The more frequent changing of bags, there will not be any more violations. Since the NPDES has a "Compliance Schedule" in it which is supposed to correct the BTEX violations, any further violations will be looked at as a failure to comply with the Compliance Schedule.

Larry Korecko  
Larry Korecko, Inspector, Ohio EPA, Central District Office

6-4-09  
Date

Erin Sherer  
Erin Sherer, Reviewer, Ohio EPA, Central District Office

6/4/09  
Date

SUNOCO EAST TERMINAL

Get New Data

VIOLATIONS JANUARY 2008 THROUGH APRIL 2009

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4IN00021*DD	May 2008	001	34010	Toluene	1D Conc	560	1019.	5/8/2008
4IN00021*DD	May 2008	001	81551	Xylene, Total	1D Conc	240	685.	5/8/2008
4IN00021*DD	September 2008	001	00400	pH	1D Conc	6.5	6.2	9/9/2008
4IN00021*DD	November 2008	001	34010	Toluene	1D Conc	560	852.	11/24/2008
4IN00021*DD	November 2008	001	81551	Xylene, Total	1D Conc	240	295.	11/24/2008
4IN00021*DD	December 2008	001	34030	Benzene	1D Conc	700	1266.	12/15/2008
4IN00021*DD	December 2008	001	81551	Xylene, Total	1D Conc	240	2230.	12/15/2008

## ATTACHMENT

The Sunoco Columbus East Terminal located at 3499 West Broad Street stores and distributes various grades of gasoline along with ethanol.

This terminal has recently added a railroad unloading facility for ethanol at the south end of the facility. For spill containment in this area they have a "zip" trench which holds the capacity of one rail car. This area is valved and when released flows through outfall -002.

The truck loading/unloading pad for ethanol has its own valve to capture spills in this area. This area drains to the diked tank farm area when the valve is opened.

Examination of monthly self-monitoring reports in SWIMS for the period January 2008 through April 2009 indicated a few BTEX violations and one pH violation. These violations are listed on an attached page.

### Compliance Schedule

Outfall -001 is the discharge from the oil-water separator serving the loading rack and some driveway runoff.

The compliance schedule in the NPDES permit for this facility was to meet final table effluent limits for benzene, naphthalene, xylene, and toluene. The first milestone was to submit a status report on what Sunoco was doing to meet these limits. This was accomplished by a timely submittal of a letter dated 3-20-07.

Sunoco instituted some procedures to limit these compounds in its oil-water separator effluent which is outfall -001.

In a letter dated March 20, 2007 Sunoco stated that the measures they have instituted appeared to have worked since they had gone 11 consecutive months meeting the final table limits. Thus they proposed to do nothing additional than to follow these new procedures.

**However**, between March 2007 and October 2007 there were three exceedences of the final table effluent limit for xylene which is 240 ug/l; this limit took effect June 1, 2008. The exceedences occurred: March 2007 when xylene was found at 327 ug/l; July 2007 when xylene was found at 522 ug/l; October 2007 where xylene was found at 454 ug/l.

Sunoco then installed an activated carbon bag through which the oil-water separator effluent flowed. This worked for some time until violations reappeared in late 2008.

The terminal now uses three activated carbon bags which the effluent from the oil-water separator flows through. The activated carbon bags are changed on a monthly basis. Previously there was only one activated carbon bag and the bag was only changed once per quarter. With this new arrangement, there is less likelihood of any overloading of all three activated carbon bags.

It should be pointed out that any further BTEX violations for outfall -001 will be considered a compliance schedule violation and subject to escalated enforcement action.

The SPCC Plan for this terminal is currently being revised. There is an April 27, 2009 draft plan that is expected to be stamped by a registered professional engineer within 2 weeks.

Spot-check comparisons of data from commercial lab sheets with monthly self-monitoring reports showed data to be correctly transposed.

Flows are estimated using either a bucket and stopwatch; or where there is a pump that discharges, the volume is calculated by multiplying the pump run time by the output of the pump.