

**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korteski, Director

June 2, 2010

RE: CUYAHOGA COUNTY  
CITY OF CLEVELAND  
SUNOCO PARTNERS MARKETING &  
TERMINALS L.P. - CLEVELAND TERMINAL  
NPDES PERMIT No. OH0002402  
Ohio EPA Permit No. 3IG00013

Mr. John Berndt, General Manager  
Sunoco Partners Marketing & Terminals L.P.  
Cleveland Terminal  
32 Independence Road  
Cleveland, Ohio 44105

Dear Mr. Berndt:

On April 27, 2010, an inspection was conducted of the Cleveland terminal facility by Mr. Todd Surrena and the undersigned. In addition to you, the facility was represented by Mr. Dayu Zhang. The purpose of the inspection was to obtain and review information in anticipation of renewal of the National Pollutant Discharge Elimination System (NPDES) discharge permit. The current permit for this facility will expire on June 30, 2010. A draft copy of the renewal permit will be sent under separate cover. Any comments regarding the draft permit must be submitted in writing during the public notice period.

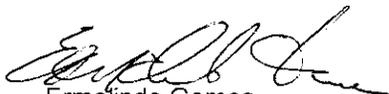
A visual inspection of the grounds indicated the facility to be well maintained and operated. The diked areas around the bulk storage tanks appeared to be structurally sound and capable of containing a potential product release. No additional information is required at this time.

Discharge monitoring reports (DMR) received by Ohio EPA for the period, January 2008 - April 2010, were reviewed and discussed during the meeting. A summary of the discharge data is listed in Attachment A. Additionally, the effluent data was reviewed for compliance with the final effluent limitations and monitoring requirements of the NPDES permit. A summary of the specific violations are cited in Attachment B. Attachment C lists potential data entry errors that may need to be revised/corrected through the eDMR system.

Please be advised that any violations referenced herein are subject to appropriate enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in the imposition of fines of up to \$10,000 per day of violation.

Should you have any questions or comments regarding this letter, please contact me at (330) 963-1196.

Respectfully,



Ermelindo Gomes  
Environmental Engineer  
Division of Surface Water

EG/mt

File: Industrial/Permits/Compliance/Sunoco Partners – Cleveland Terminal

ATTACHMENT A: OUTFALL 001 & 002 EFFLUENT SUMMARY (1/2008 -- 4/2010)

Parameter	Season	Units	# Obs.	Percentiles		Data Range
				50 <sup>th</sup>	95 <sup>th</sup>	
<b>Outfall 001</b>						
Total Precipitation	Annual	Inches	25	0	5.17	0-5.54
Flow Rate	Summer	GPD	11	300	7200	0.0003-7200
Flow Rate	Winter	GPD	14	400	7200	300-7200
Flow Rate	Annual	GPD	25	400	7200	0.0003-7200
Biochemical Oxygen Demand, 5 Day	Summer	mg/l	11	0	2.5	0-3
Biochemical Oxygen Demand, 5 Day	Winter	mg/l	14	0	18.6	0-27
Chemical Oxygen Demand (Low Level)	Annual	mg/l	25	13	79.6	0-101
pH	Annual	S.U.	25	7.7	7.9	7.5-7.9
Total Suspended Solids	Annual	mg/l	25	0	21.8	0-30
Oil and Grease, Total	Annual	mg/l	25	2	6.8	0-7
Carbon, Total Organic (TOC)	Annual	mg/l	25	0	5.7	0-11.4
Zinc, Total Recoverable	Annual	ug/l	9	40	252	0-312
Toluene	Annual	ug/l	25	0	107	0-497
Benzene	Annual	ug/l	25	0	7	0-150
Ethylbenzene	Annual	ug/l	25	0	14.2	0-186
Phenol	Annual	ug/l	9	6	92.4	0-130
Naphthalene	Annual	ug/l	9	0	0	0-0
Xylene, Total	Annual	ug/l	25	0	120	0-578
<b>Outfall 002</b>						
Total Precipitation	Annual	Inches	24	0	5.18	0-5.54
Flow Rate	Summer	GPD	10	300	7200	0.0003-7200
Flow Rate	Winter	GPD	14	400	7200	300-7200
Flow Rate	Annual	GPD	24	350	7200	0.0003-7200
Biochemical Oxygen Demand, 5 Day	Summer	mg/l	10	0	2.55	0-3
Biochemical Oxygen Demand, 5 Day	Winter	mg/l	14	0	10.4	0-24
Chemical Oxygen Demand (Low Level)	Annual	mg/l	24	20	64.7	0-126
pH	Annual	S.U.	24	7.9	8.09	7.4-8.2
Total Suspended Solids	Annual	mg/l	24	0	31.7	0-37
Oil and Grease, Total	Annual	mg/l	24	3	6.85	0-138
Carbon, Total Organic (TOC)	Annual	mg/l	24	0.2	4.76	0-54.9
Zinc, Total Recoverable	Annual	ug/l	9	40	138	0-152
Toluene	Annual	ug/l	24	0	109	0-431
Benzene	Annual	ug/l	24	0	14.8	0-159
Ethylbenzene	Annual	ug/l	24	0	19.2	0-179
Phenol	Annual	ug/l	9	0.099	111	0-161
Naphthalene	Annual	ug/l	9	0	0	0-0
Xylene, Total	Annual	ug/l	24	0	138	0-585

ATTACHMENT B: OUTFALL 001 & 002 EFFLUENT VIOLATIONS (1/2008 - 4/2010)						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
April 2010	002	Oil and Grease, Total	1D Conc	10	138.	4/15/2010

ATTACHMENT C: OUTFALL 001 & 002 POTENTIAL DATA ENTRY ERRORS				
Station	Parameter	Units	Date	Reported Value
001	Phenol	ug/l	3/19/2009	0.117
001	Phenol	ug/l	8/12/2009	0.022
001	Phenol	ug/l	12/10/2009	0.029
002	Phenol	ug/l	3/19/2009	0.093
002	Phenol	ug/l	8/12/2009	0.099
002	Phenol	ug/l	12/10/2009	0.024
002	Phenol	ug/l	3/12/2010	0.01