



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

June 1, 2012

Jennifer Roberts, Environmental Specialist  
Sunoco Logistics Partners L.P.  
P.O. Box 1014  
Toledo, OH 43605

**Re: Sunoco Partners Marketing & Terminals LP Columbus East  
NPDES Permit 4IN00021/ OH0007641  
Compliance Evaluation Inspection  
Franklin County**

Dear Ms. Roberts:

On May 2, 2012, a Compliance Evaluation Inspection was conducted at the Sunoco Partners Marketing & Terminals LP Columbus East. Present for the inspection were you and Jon Cooper of Sunoco Logistics, and myself of the Ohio EPA, Central District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant.

**Findings:**

1. Attached is compliance information for between December 2007 and April 2012. The facility has largely been compliant with the reported discharges but I have some concerns with the sampling frequency of Outfall 001.

There were approximately 50 months investigated. Of those months, there were only 18 reported discharges. Since January 2010, there have only been 9 sampling months.

Representative samples of the discharge must be collected. If there is a discharge during normal operating hours, sampling must be completed. **Please provide how you will sample in the future to provide for monthly sampling during discharges.**

2. The remaining operating practices and record retaining procedures were adequate.

Jennifer Roberts, Environmental Specialist  
Sunoco Logistics Partners L.P.  
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Attached is the compliance checklist. **A response is requested by July 1, 2012, to address sampling procedures.** If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846 or e-mail at [cole.miller@epa.ohio.gov](mailto:cole.miller@epa.ohio.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Cole Miller", written in a cursive style.

Cole Miller  
Environmental Specialist  
Compliance and Enforcement Unit  
Division of Surface Water  
Central District Office

ec: Cole Miller

CM/nsm 5-2-12 Sunoco East

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4IN00021	OH0007641	CFI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
5/2/2012	11:00 AM	11:30 AM	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Sunoco Partners Marketing & Terminals LP Columbus East	7/1/2011
	Permit Expiration Date
	6/30/2016
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Jon Cooper, Operations Supervisor Jennifer Roberts, Environmental Specialist	
Name and Title of Responsible Official	Phone Number
Jennifer Roberts, Environmental Specialist	(419) 690-0472

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
M	NPDES Compliance	Monthly sampling is required by permit.
S	Operations & Maintenance	
S	Facility Site Review	
N	Collection System	
S	Flow Measurement	
S	Receiving Waters	
N	Laboratory	

Comments:

Signatures			
	5/31/12		6/11/12
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office	Date

**Compliance Data for Sunoco Partners Marketing & Terminals LP Columbus East between  
12/1/2007 to 4/1/2012**

**Summary**

Permit Effluent Limit Violations: 7

Permit Effluent Code Violations: 0

Permit Effluent Frequency Violations: 0

Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2008	001	Toluene	1D Conc	560	1019.	5/8/2008
May 2008	001	Xylene, Total	1D Conc	240	685.	5/8/2008
September 2008	001	pH	1D Conc	6.5	6.2	9/9/2008
November 2008	001	Toluene	1D Conc	560	852.	11/24/2008
November 2008	001	Xylene, Total	1D Conc	240	295.	11/24/2008
December 2008	001	Benzene	1D Conc	700	1266.	12/15/2008
December 2008	001	Xylene, Total	1D Conc	240	2230.	12/15/2008

**SECTION D: PERMIT VERIFICATION**

- (a) Correct name and mailing address of permittee ..... Y
- (b) Correct name and location of receiving waters ..... Y
- (c) Products and production rates conform with permit application ..... Y
- (d) Flows and loadings conform with NPDES permit ..... Y
- (e) Treatment processes are as described in permit application..... Y
- (f) New treatment process added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges ..... Y
- (h) All discharges are permitted ..... Y
- (i) Number and location of discharge points are as described in permit ..... Y

Comments:

**SECTION E: COMPLIANCE**

- (a) Any significant violations since the last inspection ..... N
- (b) Permittee is taking actions to resolve violations ..... N
- (c) Permittee has a compliance schedule ..... N
- (d) Permittee is meeting compliance schedule ..... N

Comments:

**SECTION F: SELF-MONITORING PROGRAM**

- a) Primary flow measuring device operated and maintained ..... N/A  
Type of device:                      Device location:
- b) Calibration frequency adequate..... Y  
Date of last calibration:
- c) Secondary instruments operated and maintained ..... Y
- d) Flow measurements equipment adequate to handle full range of flows .... Y
- e) Actual flow discharged is measured ..... Y
- f) Flow measuring equipment inspection frequency \_\_\_\_\_
- g) Sampling location(s) are as specified by permit ..... Y
- h) Parameters and sampling frequency agree with permit..... Y
- i) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e. continuous monitoring instrumentation, calibration and maintenance records) ..... Y

Comments: Flow is based on bucket and watch for Outfall 001. Flow is based on time the pump is on for Outfall 002.

Only 8 monthly results were provided out of a 24 month period.

**SECTION G: Laboratory**

- a) EPA applicable analytical testing procedures used (40 CFR 136.3) ..... N/E
- b) If alternate procedures are used, are they properly approved? ..... N/E
- c) Analysis performed more frequency ..... N  
     If yes, are results recorded in permittee's report? ..... N/A
- d) Commercial laboratory used: ..... Y  
     Name: North Coast Environmental Labs  
     Parameters analyzed: All
- e) Quality assurance manual provided and maintained ..... N/E
- f) Calibration and maintenance of instruments is satisfactory? ..... N/E
- g) Results of last U.S. EPA quality assurance ..... N/A  
     Date:

Comments:

**SECTION H: EFFLUENT/RECEIVING WATER OBSERVATIONS**

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
001								
002	Yes							

Comments: Outfall 001 discharges to a storm sewer. Outfall 002 discharges directly to dry run when pumped. No discharge was present during inspection.

**SECTION I: MULTIMEDIA OBSERVATIONS**

- a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- b) Do you notice staining or discoloration of soils, pavement or floors ..... N
- c) Do you notice distressed (unhealthy, discolored, dead) vegetation..... N
- d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- e) Do you notice any unusual odors or strong chemical smells ..... N
- f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities ..... N

If any of the above are observed, ask the following questions:

- 1) What is the cause of the condition?
- 2) Is the observed condition or source a waste product?
- 3) Where is the suspected contaminant normally disposed?
- 4) Is this disposal permitted?
- 5) How long has the condition existed and when did it begin?

Comments: