



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 M & T LP Columbus West Terminal  
NPDES Permit 4IN00056/ OH0070408  
Compliance Evaluation Inspection  
Franklin County**

Dear Ms. Roberts:

On May 2, 2012, a Compliance Evaluation Inspection was conducted at the Sunoco Partners M & T LP Columbus West Terminal. 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 are the compliance tables between October 2009 and April 2012. There has been one month which permit effluent limits were exceeded. However, there were only 4 months with reported data for Outfall 001. Between January 2007 and October 2009, there were only 3 months in which no discharge was reported.

During the inspection, you indicated that sampling is not done at night because they are not regular business hours. The discharge point also gets flooded by Dry Run which prevents you from taking samples.

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,



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

ec: Cole Miller

CM/nsm 5-2-2012 Sunoco West CEI

**NPDES Compliance Inspection Report**

**SECTION A: NATIONAL DATA SYSTEM CODING**

Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4IN00056	OH0070408	CEI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
5/17/2012	10:00 AM	11:00 AM	No	No

**SECTION B: FACILITY DATA**

Name and Location of Facility Inspected	Permit Effective Date
Sunoco Partners M & T LP Columbus West Terminal	7/1/2010
	Permit Expiration Date
	6/30/2015
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 M & T LP Columbus West Terminal between 10/1/2009 to 4/1/2012**

**Summary**

Permit Effluent Limit Violations: 2

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
March 2012	001	Biochemical Oxygen Dem	30D Conc	30	54.	3/1/2012
March 2012	001	Biochemical Oxygen Dem	1D Conc	45	54.	3/8/2012

**SECTION D: PERMIT VERIFICATION**

- (a) Correct name and mailing address of permittee.....
- (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 ..... N/A
- (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..... N/A  
Date of last calibration:
- c) Secondary instruments operated and maintained ..... N/A
- d) Flow measurements equipment adequate to handle full range of flows .... N/A
- 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..... N\*
- 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 pump is on for Outfall 002.

Only 3 monthly results were provided out of a 30 month period.

**SECTION K: 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 L: EFFLUENT/RECEIVING WATER OBSERVATIONS**

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	Yes	No	No	No	No	No	Clear	
002	Yes	No	No	No	No	No	N/A	

Comments: Outfall 001 was surcharged by Dry Run. There was no discharge from Outfall 002.

**SECTION M: 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: