



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7009 3410 0002 1933 7823
RETURN RECEIPT REQUESTED**

6/28/11

Ziad Ramahi
Sunoco Inc. #0001-9141
940 E. 222nd St.
Euclid, OH 44123

FACILITY ID: 13-18-20-6211

NOTICE OF VIOLATION: Failure to conduct Stage II testing; Failure to provide records of required maintenance; Failure to maintain copies of Stage II Vapor Recovery Post Test Inspection Forms

Dear Mr. Ramahi:

On 6/23/11, the Cleveland Division of Air Quality (CDAQ) inspected Sunoco Inc., #0001-9141 located at 940 E. 222nd St. in Euclid. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

CDAQ has determined that Sunoco Inc., #0001-9141 failed to perform an Air-to-Liquid Ratio test (A/L), and a Static Leak test (SL) for 2011 as stipulated in Ohio Administrative Code (OAC) Rule 3745-21-09(DDD)(2). CDAQ records indicate the last A/L and SL tests conducted at this location occurred 2/16/10. This is a violation of Ohio Administrative Code Rule 3745-31-05(A)(3) and 3745-21-09(DDD)(2), and Ohio Revised Code (ORC) Section 3704.05(C) and (G).

Additionally, on-site records confirming performance of required maintenance per Executive Order and Stage II Vapor Recovery Post Test Forms were not available for review. This is a violation of OAC rule 3745-21-09(DDD)(3)(a),(b) and ORC Section 3704.05(C) and (G).

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance.



CDAQ requests that Sunoco Inc., #0001-9141:

- conduct the required testing (A/L and SL)
- provide documentation confirming required maintenance per Executive Order
- provide copies of 2009 and 2010 Stage II Vapor Recovery Post Test Forms

Test results and requested information should be submitted to the following enforcement representative:

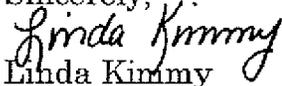
Dave DeChant
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

Your written response to this letter must be received by CDAQ within thirty (30) days of your receipt of this letter. If there is insufficient time to correct the alleged violations within this timeframe, your response must include a timeline for correcting the alleged violations.

Violations of Ohio air pollution laws and /or permit terms and conditions are subject to the penalties stipulated in Ohio Revised Code Section 3704.99(A), which allows fines of not more than twenty-five thousand dollars or imprisonment for not more than one year, or both, for each violation.

CDAQ issues this letter with Ohio EPA's concurrence. The failure to mention any specific violation does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Dave DeChant at 216-664-3213. All correspondence with CDAQ must include the Ohio EPA facility identification number for Sunoco Inc., #0001-9141: 13-18-20-6211.

Sincerely,



Linda Kimmy
Field Enforcement Manager

LK/dd

cc: George P. Baker, CDAQ
Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
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