



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 #70022030000118088466
RETURN RECEIPT REQUESTED**

February 4, 2010

Sam Kaila
Clark Sunoco
1303 Clark Avenue
Cleveland, OH 44109

**FACILITY ID: 13-18-00-7516
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Kaila:

On December 30, 2009, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requiring Clark Sunoco to submit annual Stage II compliance test results that were performed at Clark Sunoco on October 14, 2008, November 11, 2009, and December 7, 2009. Also, CDAQ requested that Clark Sunoco obtain city permits-to-operate for calendar years 2006, 2007 and 2008 by submitting city permit fees. CDAQ is in receipt of the annual Stage II compliance test results as of January 27, 2010. CDAQ is also in receipt of city permit fees as of January 14, 2010.

The corrective action was received and appropriate steps were taken to bring the source into compliance. CDAQ sent the 2006, 2007 and 2008 city permits-to-operate on January 21, 2010. CDAQ has determined that no further enforcement action is warranted at this time, for this violation. Separate correspondence will be issued concerning the failure of required Stage II tests in two consecutive years.

CDAQ issues this letter with Ohio EPA's concurrence and 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 Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for Clark Sunoco: 13-18-00-7516.

Sincerely,

George Baker
Chief of Enforcement, CDAQ

GB/ak

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318007516\2009-12-30 NEAR.doc

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Sam Kaila
 Clark Sumco
 1303 Clark Ave
 Cleveland OH 44109

2. Article Number
(Transfer from)

7002 2030 0001 1808 8466

COMPLETE THIS SECTION ON DELIVERY

A. Signature

x *Sam Kaila* Agent Addressee

B. Received by (Printed Name)

S. Kaila

C. Date of Delivery

*2/6/18*D. Is delivery address different from item 1? YesIf YES, enter delivery address below: No

3. Service Type

 Certified Mail Express Mail Registered Return Receipt for Merchandise Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-15

NEAR

Received 1/27/10



STATIC LEAK TEST SUMMARY OF SOURCE TEST DATA

GDF NAME AND ADDRESS
Location #1303
CLARK AVENUE CO.
SUNOCO
1303 CLARK AVE
CLEVELAND, OH 44109

TESTING THRU	STAGE I
TYPE OF SYSTEM	TWO POINT
NUMBER OF NOZZLES	10
NUMBER OF DISPENSERS	5
PHASE II SYSTEM TYPE	VACCUM ASSIT.
NUMBER OF P/Vs	1
TANKS MAINFOLDED?	NO
TIME LAST VEHICLE FUELD PRIOR TO TEST	8:30 AM
TIME TEST BEGAN	9:30 AM
TIME/DATE OF LAST DELIVERY	12:00 AM

TANK #	PRODUCT GRADE	ACTUAL TANK CAPACITY	GASOLINE VOLUME	ULLAGE (GAL)**
1				
2	REG	10000		
3	PRE	10000		
4				
5				
6				
7				
8				
9				
10				
TOTALS	---	20000		20000
INIT PRESSURE (INCHES H2O)				2.00
PRESSURE AFTER 1 MIN (INCHES H2O)				0.01
PRESSURE AFTER 2 MIN (INCHES H2O)				0.01
PRESSURE AFTER 3 MIN (INCHES H2O)				0.01
PRESSURE AFTER 4 MIN (INCHES H2O)				0.01
PRESSURE AFTER 5 MIN (INCHES H2O)				0.01
ALLOWABLE FINAL PRESSURE				1.94

PASS / FAIL	FAIL
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TEST CONDUCTED BY	SIGNATURE	DATE
JAMES REARDON		10/15/2008

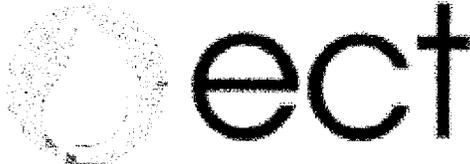
WITNESSED BY	ANDREW MARANTIDES
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COMMENTS:
FACILITY NEEDS NEW VENT CAP. TEST FAILED DUE TO DROP IN PRESSURE

Received 1/7/10

1318007516

STATIC LEAK TEST SUMMARY OF SOURCE TEST DATA



Environmental Compliance Technologies

GDF NAME AND ADDRESS
Location #1303
CLARK AVENUE CO.
SUNOCO
1303 CLARK AVE
CLEVELAND, OH 44109

TESTING THRU	STAGE I
TYPE OF SYSTEM	TWO POINT
NUMBER OF NOZZLES	10
NUMBER OF DISPENSERS	5
PHASE II SYSTEM TYPE	VACCUM ASSIT.
NUMBER OF P/Vs	1
TANKS MAINFOLDED?	NO
TIME LAST VEHICLE FUELED PRIOR TO TEST	8:30 AM
TIME TEST BEGAN	9:30 AM
TIME/DATE OF LAST DELIVERY	12:00 AM

TANK #	PRODUCT GRADE	ACTUAL TANK CAPACITY	GASOLINE VOLUME	ULLAGE (GAL)**
1				
2	REG	10000	4594	5406
3	PRE	10000	1441	8559
4				
5				
6				
7				
8				
9				
10				
TOTALS	---	20000	6035	13965

INIT PRESSURE (INCHES H2O)	2.00
PRESSURE AFTER 1 MIN (INCHES H2O)	1.92
PRESSURE AFTER 2 MIN (INCHES H2O)	1.83
PRESSURE AFTER 3 MIN (INCHES H2O)	1.71
PRESSURE AFTER 4 MIN (INCHES H2O)	1.65
PRESSURE AFTER 5 MIN (INCHES H2O)	1.58
ALLOWABLE FINAL PRESSURE	1.92

PASS / FAIL	FAIL
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TEST CONDUCTED BY	SIGNATURE	DATE
JAMES REARDON		11/11/2009

WITNESSED BY	NOT AVAILABLE
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COMMENTS:
Premium spill bucket cracked.

131800-751

Received 1/17/10

**A/L TEST
SUMMARY OF TEST RESULTS**



GDF NAME AND ADDRESS
Location #1303
SUNOCO
1303 CLARK AVE
CLEVELAND, OH 44109

TYPE OF DISPENSER	WAYNE-OTHER
TYPE OF VAPOR SYSTEM	VACCUM ASSIT.

TESTING UNIT	TRI TESTER #4356779
SERIAL #	435679
CALIB. DATE	1/29/2008
NEXT CALIB. DATE	1/29/2009

PUMP #	GAS GRADE	NOZZLE MODEL & SERIAL	GASOLINE PUMPED GALLONS	ALLOWABLE FLOW RATE PER MINUTE	FLOW RATE PER MINUTE	FLOWRATE PASS/FAIL	ALLOWABLE A/L RATE RANGE	A/L RATE	A/L RATE PASS/FAIL	PASS/FAIL
1	PRE	RICHARDS ASTRO VAC	3	6 - 10	7.98	PASS	0.9 - 1.1	0.96	PASS	PASS
1	REG	RICHARDS ASTRO VAC	3	6 - 10	8.15	PASS	0.9 - 1.1	1.01	PASS	PASS
2	MID	OPW 12VW	3	6 - 10	8.67	PASS	0.9 - 1.1	1.04	PASS	PASS
2	PRE	OPW 12VW	3	6 - 10	8.06	PASS	0.9 - 1.1	1.01	PASS	PASS
2	REG	OPW 12VW	3	6 - 10	7.65	PASS	0.9 - 1.1	1.04	PASS	PASS
3	MID	HUSKY V34-6201	3	6 - 10	7.98	PASS	0.9 - 1.1	1.08	PASS	PASS
3	PRE	HUSKY V34-6201	3	6 - 10	7.94	PASS	0.9 - 1.1	1.04	PASS	PASS
3	REG	HUSKY V34-6201	3	6 - 10	8.06	PASS	0.9 - 1.1	1.04	PASS	PASS
4	MID	HUSKY V34-6201	3	6 - 10	8.2	PASS	0.9 - 1.1	1.01	PASS	PASS
4	PRE	HUSKY V34-6201	3	6 - 10	7.5	PASS	0.9 - 1.1	0.99	PASS	PASS

4	REG	HUSKY V34-6201	3	6 - 10	7.61	PASS	0.9 - 1.1	0.99	PASS	PASS
5	MID	69-OPW 11VAI-69	3	6 - 10	8.38	PASS	0.9 - 1.1	0.99	PASS	PASS
5	PRE	69-OPW 11VAI-69	3	6 - 10	7.85	PASS	0.9 - 1.1	0.97	PASS	PASS
5	REG	69-OPW 11VAI-69	3	6 - 10	8.02	PASS	0.9 - 1.1	0.98	PASS	PASS
6	MID	HUSKY V34-6201	3	6 - 10	7.73	PASS	0.9 - 1.1	0.91	PASS	PASS
6	PRE	HUSKY V34-6201	3	6 - 10	7.32	PASS	0.9 - 1.1	0.91	PASS	PASS
6	REG	HUSKY V34-6201	3	6 - 10	8.02	PASS	0.9 - 1.1	0.97	PASS	PASS
7	MID	69-OPW 11VAI-69	3	6 - 10	9.15	PASS	0.9 - 1.1	0.95	PASS	PASS
7	PRE	69-OPW 11VAI-69	3	6 - 10	8.43	PASS	0.9 - 1.1	0.94	PASS	PASS
7	REG	69-OPW 11VAI-69	3	6 - 10	8.06	PASS	0.9 - 1.1	1	PASS	PASS
8	MID	69-OPW 11VAI-69	3	6 - 10	9.2	PASS	0.9 - 1.1	0.95	PASS	PASS
8	PRE	69-OPW 11VAI-69	3	6 - 10	8.2	PASS	0.9 - 1.1	0.95	PASS	PASS
8	REG	69-OPW 11VAI-69	3	6 - 10	8.33	PASS	0.9 - 1.1	0.94	PASS	PASS
9	MID	69-OPW 11VAI-69	3	6 - 10	8.33	PASS	0.9 - 1.1	0.95	PASS	PASS
9	PRE	69-OPW 11VAI-69	3	6 - 10	7.25	PASS	0.9 - 1.1	1.03	PASS	PASS
9	REG	69-OPW 11VAI-69	3	6 - 10	7.85	PASS	0.9 - 1.1	0.94	PASS	PASS
10	MID	69-OPW 11VAI-69	3	6 - 10	9.68	PASS	0.9 - 1.1	0.92	PASS	PASS
10	PRE	69-OPW 11VAI-69	3	6 - 10	8.29	PASS	0.9 - 1.1	0.93	PASS	PASS
10	REG	69-OPW 11VAI-69	3	6 - 10	8.38	PASS	0.9 - 1.1	0.91	PASS	PASS

TESTERS NAME	SIGNATURE	DATE
MOHAMMAD HAMAD		11/12/2008

WITNESSED BY

ANDREW MARANTIDES

COMMENTS:

Received 1/7/10



STATIC LEAK TEST SUMMARY OF SOURCE TEST DATA

GDF NAME AND ADDRESS
Location #1303
CLARK AVENUE CO.
SUNOCO
1303 CLARK AVE
CLEVELAND, OH 44109

TESTING THRU	STAGE I
TYPE OF SYSTEM	TWO POINT
NUMBER OF NOZZLES	10
NUMBER OF DISPENSERS	5
PHASE II SYSTEM TYPE	VACCUM ASSIT.
NUMBER OF P/Vs	1
TANKS MAINFOLDED?	NO
TIME LAST VEHICLE FUELED PRIOR TO TEST	8:30 AM
TIME TEST BEGAN	9:30 AM
TIME/DATE OF LAST DELIVERY	12:00 AM

TANK #	PRODUCT GRADE	ACTUAL TANK CAPACITY	GASOLINE VOLUME	ULLAGE (GAL)**
1				
2	REG	10000	1881	8119
3	PRE	10000	2290	7710
4				
5				
6				
7				
8				
9				
10				
TOTALS	---	20000	4171	15829

INIT PRESSURE (INCHES H2O)	2.00
PRESSURE AFTER 1 MIN (INCHES H2O)	1.99
PRESSURE AFTER 2 MIN (INCHES H2O)	1.99
PRESSURE AFTER 3 MIN (INCHES H2O)	1.98
PRESSURE AFTER 4 MIN (INCHES H2O)	1.97
PRESSURE AFTER 5 MIN (INCHES H2O)	1.96
ALLOWABLE FINAL PRESSURE	1.93

PASS / FAIL	PASS
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TEST CONDUCTED BY	SIGNATURE	DATE
JAMES REARDON		12/7/2009

WITNESSED BY	ANDREW KENNEY
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COMMENTS:

Received 1/7/10



A/L TEST SUMMARY OF TEST RESULTS

GDF NAME AND ADDRESS	
Location #1303	
SUNOCO	
1303 CLARK AVE	
CLEVELAND, OH 44109	

TYPE OF DISPENSER	WAYNE-OTHER
TYPE OF VAPOR SYSTEM	VACCUM ASSIT.

TESTING UNIT	TRI TESTER #435698
SERIAL #	435698
CALIB. DATE	2/26/2009
NEXT CALIB. DATE	2/26/2010

PUMP #	GAS GRADE	NOZZLE MODEL & SERIAL	GASOLINE PUMPED GALLONS	ALLOWABLE FLOW RATE PER MINUTE	FLOW RATE PER MINUTE	FLOWRATE PASS/FAIL	ALLOWABLE A/L RATE RANGE	A/L RATE	A/L RATE PASS/FAIL	PASS/FAIL
1	MID	CATLOW ICVN	3	6 - 10	9.87	PASS	0.9 - 1.1	1.06	PASS	PASS
1	PRE	CATLOW ICVN	3	6 - 10	8.33	PASS	0.9 - 1.1	1.05	PASS	PASS
1	REG	CATLOW ICVN	3	6 - 10	8.62	PASS	0.9 - 1.1	1.07	PASS	PASS
2	MID	OPW 12VW	3	6 - 10	8.82	PASS	0.9 - 1.1	1.07	PASS	PASS
2	PRE	OPW 12VW	3	6 - 10	7.81	PASS	0.9 - 1.1	1.07	PASS	PASS
2	REG	OPW 12VW	3	6 - 10	7.73	PASS	0.9 - 1.1	1.06	PASS	PASS
3	MID	HUSKY V34-6201	3	6 - 10	8.82	PASS	0.9 - 1.1	0.99	PASS	PASS
3	PRE	HUSKY V34-6201	3	6 - 10	7.58	PASS	0.9 - 1.1	1.02	PASS	PASS
3	REG	HUSKY V34-6201	3	6 - 10	7.89	PASS	0.9 - 1.1	0.96	PASS	PASS
4	MID	HUSKY V34-6201	3	6 - 10	8.72	PASS	0.9 - 1.1	0.98	PASS	PASS

4	PRE	HUSKY V34-6201	3	6 - 10	7.58	PASS	0.9 - 1.1	0.98	PASS	PASS
4	REG	HUSKY V34-6201	3	6 - 10	7.65	PASS	0.9 - 1.1	0.97	PASS	PASS
5	MID	OPW 12VW	3	6 - 10	7.65	PASS	0.9 - 1.1	1.02	PASS	PASS
5	PRE	OPW 12VW	3	6 - 10	6.88	PASS	0.9 - 1.1	1.03	PASS	PASS
5	REG	OPW 12VW	3	6 - 10	6.82	PASS	0.9 - 1.1	1.03	PASS	PASS
6	MID	HUSKY V34-6201	3	6 - 10	8.93	PASS	0.9 - 1.1	0.93	PASS	PASS
6	PRE	HUSKY V34-6201	3	6 - 10	7.65	PASS	0.9 - 1.1	0.93	PASS	PASS
6	REG	HUSKY V34-6201	3	6 - 10	8.15	PASS	0.9 - 1.1	0.91	PASS	PASS
7	MID	CATLOW ICVN	3	6 - 10	9.04	PASS	0.9 - 1.1	1.02	PASS	PASS
7	PRE	CATLOW ICVN	3	6 - 10	8.15	PASS	0.9 - 1.1	1	PASS	PASS
7	REG	CATLOW ICVN	3	6 - 10	8.06	PASS	0.9 - 1.1	0.95	PASS	PASS
8	MID	OPW 12VW	3	6 - 10	7.98	PASS	0.9 - 1.1	1.01	PASS	PASS
8	PRE	OPW 12VW	3	6 - 10	7.21	PASS	0.9 - 1.1	0.98	PASS	PASS
8	REG	OPW 12VW	3	6 - 10	7.21	PASS	0.9 - 1.1	1.02	PASS	PASS
9	MID	CATLOW ICVN	3	6 - 10	9.04	PASS	0.9 - 1.1	1	PASS	PASS
9	PRE	CATLOW ICVN	3	6 - 10	7.98	PASS	0.9 - 1.1	0.97	PASS	PASS
9	REG	CATLOW ICVN	3	6 - 10	7.81	PASS	0.9 - 1.1	0.98	PASS	PASS
10	MID	69-OPW 11VAI-69	3	6 - 10	9.74	PASS	0.9 - 1.1	0.97	PASS	PASS
10	PRE	69-OPW 11VAI-69	3	6 - 10	8.15	PASS	0.9 - 1.1	0.96	PASS	PASS
10	REG	69-OPW 11VAI-69	3	6 - 10	8.52	PASS	0.9 - 1.1	0.93	PASS	PASS

TESTERS NAME	SIGNATURE	DATE

JAMES REARDON		11/11/2009
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WITNESSED BY	ANDREW KENNEY
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COMMENTS:
