



HESS Department



Marathon Petroleum Company LP

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VIA FEDERAL EXPRESS

May 3, 2019

Mr. Jorge Acevedo
Michigan Department of Environmental Quality
Air Quality Division
3058 W. Grand Boulevard
Suite 2300
Detroit, MI 48202

RE: Response to 04/12/2019 Second Violation Notice Regarding - Odors beyond the facility's property line and uncombusted gases from the Coker Flare; Marathon Petroleum Company LP, Michigan Refining Division – SRN A9831

Dear Mr. Acevedo:

This letter is in response to the April 12, 2019 Second Violation Notice (VN) issued to Marathon Petroleum Company LP, Michigan Refining Division (MPC). The VN requested that MPC supplement its March 15, 2019 response to a Violation Notice dated February 22, 2019 by providing additional information on "Steps Taken to Prevent a Recurrence" of the events described in the February 22 VN. At the time of MPC's March 15 response, MPC's incident investigation was still underway. Consequently, MPC's corrective actions—which are based on the findings of the incident investigation—had not yet been developed.

The VN requested a written response by April 26, 2019 (14 days from the date of the letter); however, an extension was granted to May 3, 2019 due to the delayed receipt of the letter over the Easter holidays.

In the VN, Michigan Department of Environmental Quality, Air Quality Division (AQD), alleged that the following violations occurred:

Process Description	Rule/Permit Condition Violated	Comments
Process associated with oil refining at 1300 South Fort Street.	General Condition 12(b) of ROP No. MI-ROP-A9931-2012b, Section 1; Michigan Administrative Rule 901 (R 336.1901)	Detection of odors beyond the facility's property line, attributable to the facility, of sufficient intensity and duration so as to constitute an unreasonable interference with the comfortable enjoyment of life and property

EU-COKERFLARE-S1	40 CFR 63.643(a)(2) ROP No. MI-ROP-A9831-2012c, FGFLARES-S1, Condition III.14 ROP No. MI-ROP-A9831-2012c, FGFLARES-S1, Condition III.12 40 CFR 60.18	Vent gases were not being combusted in Coker Flare, this not meeting the requirements of reducing emissions of organic HAPS by 98 weight-percent or to a concentration of 20 parts per million by volume, on a dry basis, corrected to 3 percent oxygen, whichever is less stringent.
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This letter provides information requested in the VN, specifically: what steps are being taken to prevent a reoccurrence. The request is italicized bold and MPC's response is underneath each item.

Steps Taken to Prevent a Reoccurrence:

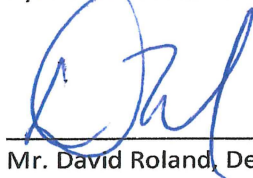
The Detroit Refinery conducted an incident investigation and identified a hole in the molecular seal and a failed liquid drain line as causal factors that contributed to the release of non-combusted gases. Based on findings from the investigation, MPC established a corrective action plan to prevent future reoccurrences. The corrective action plan is described below and will be discussed in more detail at a future meeting with MDEQ:

1. Update operations procedures and tasks to add a daily verification step to ensure the molecular seal drain line is draining properly.
2. Modify drain line level indicator on the molecular seal by installing a high level pressure transmitter to help identify overfill conditions.
3. Enhance turnaround and major project field verification checklists to include smaller equipment like molecular seals.
4. Enhance community air monitoring process to include post-incident monitoring.

MPC appreciates this opportunity to supplement its response to the VN. If you would like further information, please do not hesitate to contact Honor Sheard at 313-297-6248.

Sincerely,

Marathon Petroleum Company LP
By: MPC Investment LLC, its General Partner



Mr. David Roland, Deputy Assistant Secretary

cc: Mr. Paul Max, City of Detroit, BSEED
Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ
Mr. Jonathan Lamb, DEQ