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Air Quality Division  
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Marathon Petroleum Company LP

VIA FEDERAL EXPRESS

December 30, 2019

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Mr. Jonathan Lamb  
Senior Environmental Quality Analyst  
Michigan Department of Environment, Great Lakes, and Energy  
Air Quality Division  
3058 W. Grand Boulevard  
Suite 2-300  
Detroit, MI 48202

**RE: Response to 12/9/2019 Violation Notice Regarding Nuisance Odors on 11/25/2019; Marathon Petroleum Company, LP, Michigan Refining Division (SRN A9831)**

Dear Mr. Lamb:

This letter is in response to the December 9, 2019 Violation Notice (VN) issued to Marathon Petroleum Company LP (MPC), Michigan Refining Division (MRD). In the VN, Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), alleged that the following violations of permit conditions occurred.

Process Description	Rule/Permit Condition Violated	Comments
FGGROUP2, Tanks 314 Through 320 and Tank 324	R 336.1901(b) ROP No. MI-ROP-AR831- 2012c, A-S1, GC 12(b)	Moderate to Strong (Level 3 and 4) asphalt odors Observed emitting from the facility and impacting nearby neighborhoods.

The VN requested a written response including: 1) the dates the violation occurred; 2) an explanation of the causes and duration of the violation; 3) whether the violation is ongoing; 4) a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place and 5) what steps are being take to prevent reoccurrence. The VN specified a response date of December 30, 2019.

Dates the Violation Occurred:

On November 25, 2019 from approximately 9:00 PM to 9:40 PM, Mr. Jonathan Lamb of AQD investigated a complaint of nuisance odors alleged to be the result of operations at MRD. Asphalt odors were detected downwind of MRD's Rouge Tank Farm.

Ms. Katie Koster of AQD, investigating a separate complaint earlier in the afternoon of November 25, observed asphalt odors which she attributed to MRDs asphalt tanks.

On the morning of November 26, Mr. Jorge Acevedo of AQD left a voicemail with MRD's Environmental Supervisor informing of the PEAS odor complaint received the prior night.

Explanation of the Causes and Duration of the Violation:

On the day of the odor complaint (11/25/2019) MRD was loading an asphalt barge from Tank 315 at the Rouge Tank Farm. Barge loading started at ~9:40 AM on 11/25/2019 and ended on 11/26/2019 at ~12:01 AM. The starting product level in the tank on that day was ~33.8' with an end of day level of ~10.8'. Tank 315 contained an asphalt formulation which has a lower viscosity compared to MRD's standard asphalt formulations. All renewable operating permit conditions for barge loading were met.

During the initial response to the complaint on 11/26/2019, MRD confirmed asphalt odors were emanating from vents on Tank 315 in the Rouge Tank Farm. The product level in this tank was at ~10' and a temperature of ~315 deg F. A multi-gas portable monitor did not reveal any detectable levels of volatile organic compounds (VOCs) or hydrogen sulfide (H<sub>2</sub>S) in the Rouge Tank Farm; however, an infrared camera indicated that the vents on Tank 315 were at a higher temperature than the vents on surrounding asphalt tanks.

MRD believes that higher tank temperatures combined with the lower viscosity asphalt were the likely cause of the odors observed on 11/25/2019.

Whether the Violation is Ongoing

The violation is not ongoing. After it was determined that the Tank 315 and barge loading were the likely source of odor issues, the tank temperature was decreased, and chemical treatment was applied to the tank to mitigate the odors. Barge loading was completed by the time refinery personnel were made aware of the 11/25/2019 odor complaint.

Summary of the Actions Taken:

After the voicemail was received from AQD on 11/26/2019, Rouge Tank Farm personnel began reviewing operational logs which indicated a barge was being loaded from Tank 315. Barge loading and routine asphalt truck loading are the only activities that occurred on 11/25/2019. Since barge loading had been completed, Refinery personnel were dispatched to Tank 315 with a multi-gas monitor and infrared camera to determine the source of the odors. Although no VOCs or H<sub>2</sub>S were detected, the atmospheric vent temperature on Tank 315 was noted to be higher than surrounding tanks.

Operational moves were made to lower the Tank 315 temperature, which included reducing hot oil flow to the heater and sponging the tank with ~10,000 bbl. of cold, heavier grade asphalt. Scavenger chemical was added to the Tank 315. The combination of these steps helped to quickly reduce the temperature.

MRD initiated an incident investigation to determine the root cause of the incident. This investigation is ongoing.

Steps Taken to Prevent a Reoccurrence:

MRD at this time has temporarily discontinued the production of the lighter asphalt that contributed to the odors. The results of the incident investigation will assist in determining MRD's course of action to prevent a reoccurrence.

MPC appreciates this opportunity to respond to the VN. If you would like further information on this response, please do not hesitate to contact Jeremy Beasley at 313-297-6346.

Sincerely,

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



David E. Leaver, Deputy Assistant Secretary

Attachments

Renewable Operating Permit Report Certification

cc. Mr. Paul Max, City of Detroit, BSEED  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Chris Ethridge, EGLE  
Ms. Jenine Camilleri, EGLE  
Ms. Karen Kajiya-Mills, EGLE  
Ms. Wilhemina McLemore, EGLE  
Mr. Jeff Korniski, EGLE  
Mr. Jorge Acevedo, EGLE