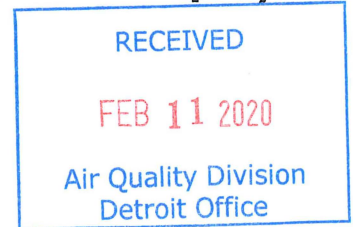




Marathon Petroleum Company LP

1001 S. Oakwood
Detroit, MI 48217
Main No.: 313.297.6000



VIA FEDERAL EXPRESS

February 10, 2020

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 01/06/2020 Violation Notice Regarding Nuisance Odors on 12/15/2019; Marathon Petroleum Company, LP, Michigan Refining Division (SRN A9831)

Dear Mr. Lamb:

This letter is in response to the January 6, 2020 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
Process associated with oil refining.	R 336.1901(b) ROP No. MI-ROP-A9831-2012c, A-S1, GC 12(b)	Moderate to Strong (Level 3 and 4) refinery, sulfur, and sewage sludge-type 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. Please also submit PAMS data for the following dates: December 13 through December 15, 2019.

The VN specified a response date of January 27, 2020. This date was extended to February 10, 2020 by Jorge Acevedo to allow the refinery more time to investigate the alleged incident.

Dates the Violation Occurred:

On December 15, 2019 Mr. Jonathan Lamb of AQD performed an investigation from approximately 1:35 PM to 2:30 PM, during which time persistent, moderate to strong (level 3 and 4) refinery, sulfur, and sewage sludge type odors were detected in residential areas downwind of the refinery which were traced back to Marathon's refinery operations.

Explanation of the Causes and Duration of the Violation:

On the day of this investigation (December 15, 2019), MRD was experiencing normal operations, all flares and CEMs operations were normal. All PAMS data during this time was in normal ranges, with TRS data reflecting "Very Good to Good" Air Quality.

Around the time of the complaint, the MBR (Membrane Bio Reactor) at our waste water treatment facility was experiencing a slight loss of nitrification, resulting in slightly increased ammonia in the MBR outlet. All samples indicated we were well within permit limits. Also, no complaints referenced "ammonia-type" odors. When operations became aware of the increased levels of ammonia, we began actively troubleshooting the issue.

Additional monitoring of the waste water system was conducted and operational adjustments were made to address the issue. These adjustments included:

- Wastewater was temporarily held (i.e. not discharged) to allow refinery personnel time to check conditions within the Waste Water Treatment Plant.
- The addition of nitrifying bacteria to improve denitrification.
- Temporarily increased air flow (Dissolved Oxygen) to the MBR.
- Increased operator rounds at the WWTP.
- Refinery personnel checked sewers on Fort Street

Whether the Violation is Ongoing

The violation is not ongoing. All plant operations were reported as normal during this time frame. Since the date of the alleged incident, no external odor complaints have been received.

Summary of the Actions Taken:

Upon receiving calls from the community and EGLE regarding potential odors in the area, refinery personnel increased frequency of operator rounds in the WWTP and began reviewing operational logs. Aside from increased levels of ammonia in the WWTP Permeate, there were no abnormal operations that would have led to increased odors. Refinery personnel drove through the neighboring community several times over the next week; however, no refinery odors were observed. An incident investigation was initiated and is still underway.

Steps Taken to Prevent a Reoccurrence:

MRD at this time has increased monitoring and attention directed at the MBR to ensure steady, healthy operation is maintained. The results of the incident investigation and continued increased attention 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
Mr. Jeff Korniski, EGLE
Mr. Jorge Acevedo, EGLE