

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY





DAN WYANT DIRECTOR

May 29, 2015

Mr. David Roland, Deputy Assistant Secretary Marathon Petroleum Company LP 1300 South Fort Street Detroit, MI 48217

SRN: A9831, Wayne County

Dear Mr. Roland:

On May 9, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), observed black smoke emanating from the cracking plant flare at Marathon Petroleum Company LP (Marathon) located at 1300 South Fort Street, Detroit, Michigan. Mr. Todd Zynda of the AQD conducted Method 9 visible emissions readings. Also, the AQD has completed its review of the Rule 912 Notification letter submitted by Marathon on May 18, 2015.

As a result, the following air pollution violations were observed:

Process	Rule/Permit]
Description	Condition Violated	Comments
EUCPFLARE-S1	General Condition 11(a) of ROP No. MI-ROP-A9831-2012b, Section 1; and Michigan Administrative Rule 301 (R 336.1301)	100% was the highest 6 minute average opacity.
EUCPFLARE-S1	ROP No. MI-ROP-A9831-2012b, Table FGFLARES-S1, Condition I.1; and 40 CFR 60.18 (c)(1)	Visible emissions in excess of five minutes during two consecutive hours.
EU11-FCCU-S1	ROP No. MI-ROP-A9831-2012b, Table EU11-FCCU-S1, Condition 1.3; 40 CFR 60.103; and 40 CFR 63.1565	Carbon Monoxide emissions exceeded the ROP limit of 500 ppm (hourly) for 12 hours from May 9-10, 2015
EU11-FCCU-S1	General Condition 11(a) of ROP No. MI-ROP-A9831-2012b, Section 1; and Michigan Administrative Rule 301 (R 336.1301)	Opacity from the Fluid Catalytic Cracking Unit in excess of 20% (six minute average) for 4 hours from May 9-10, 2015
EU11-FCCU-S1	ROP No. MI-ROP-A9831-2012b, Table EU11-FCCU-S1, Condition 1.1; 40 CFR 60.102(a)(1); and 40 CFR 63.1564	Particulate Matter (PM) emissions exceeded the ROP limit of 0.8 pounds/1000 pounds of coke burn off for 11 hours from May 9-10, 2015
EU11-FCCU-S1	PTI 63-08D, EU11-FCCU-S1, Condition 1.2; R 336.1205; R 336.2802; and 40 CFR 52.21	PM_{10} emissions exceeded the PTI limit of 1.1 pounds/1000 pounds of coke burn off (3 hr average) for 11 hours from May 9-10, 2015

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Enclosed are copies of the instantaneous and six-minute average readings taken at Marathon Petroleum Company LP.

AQD acknowledges that an incident investigation is currently being conducted. Please submit a written response to this Violation Notice by June 19, 2015(which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

In addition to the response, please provide the following operational data for the Cracking Plant Flare for the time period of May 9-10, 2015:

- 1) Heat Content of Vent Gas to Cracking Plant Flare
- 2) Steam to Vent Gas Ratio for Cracking Plant Flare

If Marathon Petroleum Company LP believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely, Jorge Acevedo Senior Environmental Engineer Air Quality Division 313-456-4679

Enclosure

cc: Ms. LaReina Wheeler, City of Detroit, Department of Environmental Affairs cc/via e-mail: Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ Ms. Teresa Seidel, DEQ Mr. Thomas Hess, DEQ Ms. Wilhemina McLemore, DEQ Mr. Jeffrey Korniski, DEQ Mr. Todd Zynda, DEQ