



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

July 23, 2019

Mr. David T. Roland
Deputy Assistant Secretary
Marathon Petroleum Company LP
1001 S. Oakwood
Detroit, MI 48217

SRN: A9831, Wayne County

Dear Mr. Roland:

VIOLATION NOTICE

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), reviewed the quarterly excess emission report submitted by Marathon Petroleum Company LP (MPC) located at 1001 South Oakwood in Detroit, Michigan. The First Quarter 2019 Continuous Emission Monitoring (CEMS) Downtime and Excess Emission Report was received on May 1, 2019. During review of the First Quarter 2019 CEMS report, the AQD evaluated compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-A9831-2012c and Permit to Install (PTI) No. 118-15.

During the review, the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
East Plant Fuel Gas NSPS Heaters	MI-ROP-A9831-2012c, FGHEATERS-S1, SC VI. 1	First quarter 2019 H ₂ S Monitor downtime was 11.11%
East Plant Fuel Gas NSPS Heaters	MI-ROP-A9831-2012c, FGHEATERS-S1, SC II.1	First quarter 2019 H ₂ S excess emissions were 5.65%
East Plant SRU Thermal Oxidizer	MI-ROP-A9831-2012c, EU42-43SULRECOV-S1, SC I.1	First quarter 2019 SO ₂ excess emissions were 12.31%
GOHT 2 Heater	PTI 118-15, EU08-GOHTCHARHTR2-S1, SC I.1	First quarter 2019 NO _x excess emissions were 25.85%
FCCU Regenerator	General Condition 11(a) of ROP No. MI-ROP-A9831-2012c, Section 1, and Michigan Administrative Rule 301 (R 336.1301)	First quarter 2019 Opacity excess emissions were 5.00%.

The first quarter 2019 excess emissions report indicated that there was an extended period of monitor downtime with the East Plant Fuel Gas NSPS Heaters (FGHEATERS-S1). Specifically, the H₂S monitor downtime was reported at 11.11% of the operating time for the quarter.

Mr. David T. Roland
Marathon Petroleum Company LP
Page 2
July 23, 2019

The first quarter 2019 excess emissions report indicated that there was an extended period of monitor downtime with the East Plant Fuel Gas NSPS Heaters (FGHEATERS-S1). Specifically, the H₂S monitor downtime was reported at 11.11% of the operating time for the quarter.

The first quarter 2019 excess emissions report indicated that there were excess emissions associated with the East Plant Fuel Gas NSPS Heaters (FGHEATERS-S1). Specifically, H₂S emissions exceeded 160 ppm on a 3 hour average for 5.65% of the time for 1st Quarter 2019 ranging from 176 to 300 ppm on a 3 hour average.

The first quarter 2019 excess emissions report indicated that the excess emissions associated with the East Plant SRU Thermal Oxidizer (EU42-43SULRECOV-S1). Specifically, SO₂ emissions exceeded 250 ppm SO₂ by volume on a 12 hour average for 12.31% of the time for 1st Quarter 2019 ranging from 268 to 535 ppm SO₂ by volume on a 12 hour average.

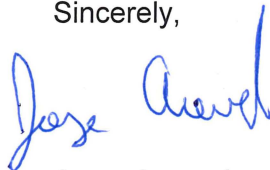
The first quarter 2019 excess emissions report indicated that there were excess emissions associated with the GOHT 2 Heater (EU08-GOHTCHARHTR2-S1). Specifically, NO_x emissions exceeded 40 ppm NO_x on a 30 day rolling average for 25.85% of the time for 1st Quarter 2019 ranging from 41 to 61 ppm on a 30 day rolling average.

The first quarter 2019 excess emissions report indicated that there were excess emissions associated with the FCCU Regenerator (EU11-FCCU-S1). Specifically, Opacity emissions exceeded 20% (six minute average) for 5.00% of the time for 1st Quarter 2019 ranging from 21 to 84 % (six minute average).

AQD acknowledges that Marathon Petroleum explained in the submittal of the quarterly excess emission report that some of the higher percentage excess emissions were due to the low number of operating hours due to the extended maintenance outage that occurred in February 2019. The purpose of this Violation Notice is to document the violations and to acknowledge that actions have been taken to prevent the future occurrence of the cited violations. There is no need to respond except to update AQD with any additional corrective actions.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the Marathon Petroleum Company 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

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