

GRETCHEN WHITMER GOVERNOR STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK DIRECTOR

October 7, 2019

Mr. David Leaver Deputy Assistant Secretary Marathon Petroleum Company LP 1001 South Oakwood Detroit, MI 48217

SRN: A9831, Wayne County

Dear Mr. Leaver:

VIOLATION NOTICE

On September 23, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a Rule 912 notification report dated September 20, 2019 from Marathon Petroleum Company LP located at 1001 South Oakwood, Detroit, Michigan. Staff reviewed the report to determine Marathon's 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 Renewable Operating Permit (ROP) number MI-ROP-A9831-2012c.

Based on a review of the Rule 912 notification report, the following air pollution violations were observed:

Process Description	Rule/Permit Condition Violated	Comments
FCCU (EU11-FCCU-S1)	40 CFR 63.1564(a)(5)(ii)	The inlet velocity to the primary internal cyclones of the of the catalytic cracking unit catalyst regenerator must be maintained at or above 20 feet per second during startup, shutdown and hot standby. During startup, the primary cyclone inlet velocity was below the 20 feet per second limit for 13 hours from September 14 through September 15. The lowest velocity was 9 feet per second.

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FCCU (EU11-FCCU-S1)	General Condition 11(a) of ROP No. MI-ROP-A9831- 2012c, Section 1, and Michigan Administrative Rule 301 (R 336.1301)	The FCCU exceeded a 6- minute average of 20%opacity on :
		326 occasions during September 14, 2019 to September 15, 2019.
		The highest six minute average was 97%

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 28, 2019 (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.

Please submit the written response to EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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

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