



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
DETROIT DISTRICT OFFICE



DANIEL EICHINGER
ACTING DIRECTOR

March 15, 2023

VIA E-MAIL

John S. Stefko
Deputy Assistant Secretary
Marathon Petroleum Company LP
1300 South Fort Street
Detroit, Michigan 48217

SRN: A9831; Wayne County

Dear John S. Stefko:

VIOLATION NOTICE

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) has reviewed the Relative Accuracy Test Audit (RATA) reports submitted by Marathon Petroleum Company LP (Marathon) located at 1300 South Fort Street in Detroit, Michigan. The initial RATA was performed on December 1, 2022, and retested on January 31, 2023.

The Renewable Operating Permit MI-ROP-A9831-2012c requires the facility to monitor and record hydrogen sulfide (H₂S) emissions from EUCOKERFLARE-S1 with a continuous emissions monitoring system (CEMS) that is installed, calibrated, operated, and maintained in accordance with MI-ROP-A9831-2012c, Title 40 of the Code of Federal Regulations (40 CFR), Part 60, Subpart Ja, and the quality assurance procedures of 40 CFR Part 60, Appendix F.

During the report review, staff determined the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCOKERFLARE-S1 (FG-FLARES-S1)	MI-ROP-A9831-2012c, FG-FLARES-S1 SC VI. 12 40 CFR Part 60, Appendix B and F	Failure to perform required quality assurance testing.

The RATA reports were received on February 20, 2023. During report review, 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; the Air Pollution Control Rules; and the conditions of ROP MI-ROP-A9831-2012c.

A RATA of the CEMS was performed on December 21, 2022. Based on review, two of the nine RATA runs performed were deemed invalid due to the facility analyzer validations occurring during the runs. Seven of the runs are valid. 40 CFR Part 60,

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Appendix B, Performance Specification 7, requires a minimum of nine sets of reference method tests. The RATA was repeated and passed on January 31, 2023.

In accordance with the 40 CFR Part 60, Appendix F Quality Assurance Procedures, a CEMS must be audited at least once each calendar quarter. A cylinder gas audit (CGA) may be conducted in three of the four quarters, but in no more than three quarters in succession. The RATA must be conducted at least once every four calendar quarters. CGAs were completed in the first, second, and third quarters of 2022; therefore, a RATA was required in the fourth quarter of 2022.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 5, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include:

- The dates the violation occurred;
- An explanation of the causes and duration of the violation;
- Whether the violation is ongoing;
- 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
- What steps are being taken to prevent a reoccurrence.

Please submit the written response to the following locations:

Regina Angellotti
EGLE, Air Quality Division
3058 West Grand Boulevard
Suite 2-300
Detroit, Michigan 48202-6058

Dr. April Wendling
EGLE, Air Quality Division
3058 West Grand Boulevard
Suite 2-300
Detroit, Michigan 48202-6058

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

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

Sincerely,



Regina Angellotti
Environmental Quality Analyst
Air Quality Division
313-418-0895

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cc: Hosam Hossanien, City of Detroit BSEED
Crystal Rogers, City of Detroit BSEED
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Dr. April Wendling, EGLE
Steve Weis, EGLE