



Marathon Petroleum Company LP

1300 South Fort Street
Detroit, MI 48217
Tel: 313.843.9100



Via Federal Express

November 3, 2015

Mr. Jorge Acevedo
Michigan Department of Environmental Quality
Air Quality Division
3058 W. Grand Boulevard
Suite 2300
Detroit, MI 48202

RE: Response to 10/14/15 Violation Notice Regarding CCR Heater and InterHeater PM Compliance Testing; Marathon Petroleum Company LP, Michigan Refining Division

Dear Mr. Acevedo:

This letter is in response to the October 14, 2015 Violation Notice (VN) issued to Marathon Petroleum Company LP, Michigan Refining Division (MPC). In the VN, Michigan Department of Environmental Quality, Air Quality Division, alleged that the following violations occurred July 21-24, 2015.

Process Description	Rule/Permit Condition Violated	Comments
CCR Charge Heater (EU14-CCRPLCHARHTR-S1)	PTI 63-08D, FGHEATERS-S1, Condition I.22 R 336.1205 R 336.2802 40 CFR 52.21	The Particulate Matter permit limit is 0.0019 lb/MMBTU. The stack test result was 0.0021 lb/MMBTU
CCR Inter-Heater (EU14-CCRPLINTHTR-S1)	PTI 63-08D, FGHEATERS-S1, Condition I.22 R 336.1205 R 336.2802 40 CFR 52.21	The Particulate Matter permit limit is 0.0019 lb/MMBTU. The stack test result was 0.0033 lb/MMBTU

The VN relates to the results of stack tests on the CCR Charge Heater and CCR Inter-Heater conducted July 21-24, 2015. During the tests, black and gray particles were observed on the Method 5 PM filters from both heater stacks. The black particles were determined to be magnetic iron oxide scale and the gray particles to be sandblast media. Because both of these heaters are gas fired, these particles are not thought to be representative of the exhaust gas from combustion but were likely tube scale and sand blasting material that remained in the heaters from maintenance activities conducted in 2012. MPC believes that under normal operation of the heaters, there was insufficient lift to purge this material from the stack and it was likely levitating or "floating" in the stack near the test ports. MPC discussed the results with MDEQ at the time of the tests, and performed a retest the week of July 28, 2015. Prior to the retest, MPC purged the system to dislodge any remaining foreign materials. The results of the retest demonstrated results below the 0.0019 lb/MMBTU permit limit for both

heaters. The remainder of this letter provides information requested in the VN, including: (1) the date(s) the alleged violations occurred; (2) an explanation of the causes and duration of the alleged violations; (3) whether the violations are ongoing; and (4) a summary of the actions that have been taken and are proposed to be taken to correct the alleged violations.

Date the Violation Occurred: The alleged violations occurred only during the period July 21-24, 2015. The alleged violations are not on-going. Further, the alleged violations did not occur prior to the date of the July 21-24 stack test—as described above, MPC does not believe that the material entrained in the heater stacks exited the stack under normal operating conditions.

Explanation of the Causes and Duration of the Violation:

As described above, during the week of July 21-24, 2015, MPC performed PM testing on the CCR Charge and Interheaters. During these tests, black and gray particles were observed on the Method 5 PM filters from both heater stacks. Upon inspection, the particles appeared to levitate/float in the upper section of the heater stack. MPC had a sample of the particles analyzed and the results showed that the black particles were magnetic and likely iron oxide scale, and the gray materials were likely sandblasting material.

Because both of these heaters are gas-fired, these particles are not thought to be representative of normal stack gas conditions. Rather, the particles were most likely tube scale and sand blasting material left in the heater from previous maintenance activities. Because the materials were entrained in the upper section of the heater stack during the July 21-24, 2015 test, the results of that test are not thought to be representative of normal stack gas conditions. Indeed, after purging the material, MPC demonstrated compliance with applicable emissions limitations in a subsequent retest.

The duration of the violation was limited to the period July 21-24, 2015. MPC does not believe that the material identified during the July 21-24 stack test event exited the stack during normal operating conditions, and compliance with applicable emissions limitations was demonstrated during the retest that was conducted the week of July 28, 2015.

Summary of the Actions Taken: MPC discussed the results with MDEQ at the time of the tests and decided to perform a retest the week of July 28, 2015. Prior to the retest, MPC performed a purge of the system to dislodge any remaining materials. The results of this retest demonstrated results below the 0.0019 lb/MMBtu permit limit for both heaters. Thus, MPC demonstrated compliance with the applicable emissions limitations during the testing conducted the week of July 28, 2015.

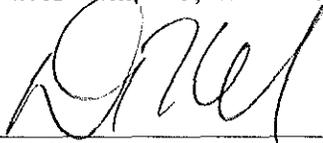
Steps Taken to Prevent a Reoccurrence: As a result of this incident, MPC intends to implement the following long-term corrective actions:

1. An incident investigation was conducted and a work notification will be entered to have all CCR heaters cleaned during the next planned outage. This will include cleaning of the convection section tubes and vacuuming the heater floors.

MPC appreciates this opportunity to respond to the VN. If you would like further information please do not hesitate to contact Ian Ladomer at 313-297-6336.

Sincerely,

Marathon Petroleum Company LP
By: MPC Investment, LLC, its General Partner



Mr. David Roland, Deputy Assistant Secretary

cc: Ms. LaReina Wheeler, City of Detroit, Department of Environmental Affairs
Ms. Lynn Fielder, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ
Mr. Todd Zynda, DEQ

Attachments: Renewable Operating Permit Report Certification

MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT
REPORT CERTIFICATION**

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Natural Resources and Environment, Air Quality Division upon request.

Source Name Marathon Petroleum Company LP County Wayne

Source Address 1300 South Fort Street City Detroit

AQD Source ID (SRN) A9831 ROP No. MI-ROP-A9831-2012b ROP Section No. 01

Please check the appropriate box(es):

Annual Compliance Certification (Pursuant to Rule 213(4)(c))

Reporting period (provide inclusive dates): From _____ To _____

1. During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.

2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, EXCEPT for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))

Reporting period (provide inclusive dates): From _____ To _____

1. During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.

2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, EXCEPT for the deviations identified on the enclosed deviation report(s).

Other Report Certification

Reporting period (provide inclusive dates): From 10/14/2015 To 10/14/2015

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

Response to October 14, 2015 Violation Notice pertaining to the July 21-24, 2015 CCR

Charge and Inter Heaters PM stack tests.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

David Roland MPC Investment LLC, 313-843-9100
Name of Responsible Official (print or type) its General Partner Title Deputy Assistant Secretary Phone Number

[Signature] 11/3/2015
Signature of Responsible Official Date