

State Registration Number  
A9831

**RENEWABLE OPERATING PERMIT**  
**March 26, 2012 STAFF REPORT**

ROP Number  
MI-ROP-A9831-2012c

MARATHON PETROLEUM COMPANY LP

SRN: A9831

Located at

1300 South Fort Street  
12700 Toronto Street  
301 South Fort Street  
Detroit, Michigan 48217

Permit Number: MI-ROP-A9831-2012c

Staff Report Date: March 26, 2012

Amended Dates: May 20, 2013; November 6, 2013; July 8, 2016

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) requires that the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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Michigan Department of Environmental Quality  
Air Quality Division

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**RENEWABLE OPERATING PERMIT**  
**March 26, 2012 STAFF REPORT**

ROP Number  
MI-ROP-A9831-2012

**Purpose**

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with a ROP pursuant to Title V of the federal Clean Air Act of 1990 and Michigan's Administrative Rules for air pollution control pursuant to Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft permit terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft permit pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

**General Information**

Stationary Source Mailing Address:	Marathon Petroleum Company LP 1300 Fort Street Detroit, Michigan 48217
Source Registration Number (SRN):	A9831
North American Industry Classification System (NAICS) Code:	324110
Number of Stationary Source Sections:	2
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	200800055
Responsible Official:	Section 1- Detroit Refinery C. Tracy Case Deputy Assistant Secretary 313-843-9100  Section 2- Detroit Terminal Bradley R. McKain Deputy Assistant Secretary 419-421-4422
AQD Contact:	Jorge Acevedo, Environmental Engineer 313-456-4679
Date Permit Application Submitted:	May 9, 2008
Date Application Was Administratively Complete:	May 9, 2008
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	March 26, 2012
Deadline for Public Comment:	April 25, 2012

## **Source Description**

Marathon Petroleum Company LLC. – Detroit Refinery and Detroit Terminal are located at 1300 Fort Street, 301 Fort Street, and 12700 Toronto Street in the southwest part of the City of Detroit, Michigan. The facilities are sited between Interstate Highway I-75, Fort Street, Oakwood Avenue and Dix Avenue and the Rouge River. The nearest residential area is approximately 100 feet west of Stocker Avenue near the Rouge River Terminal.

The Renewable Operating Permit has two sections which are Section 1, Detroit Refinery and Section 2, Detroit Terminal.

The Refinery processes approximately 105,000 barrels per day (B/D) of crude oil which is refined into a product mix of liquefied petroleum gases, gasoline, fuel oil, Asphalt, and other products. The makeup of this production will vary depending on the type of crude used as charge stocks. The finished products leave the facility via truck, lake tanker, railroad car, or pipeline. The refinery operates 24 hours per day, 7 days per week and 52 weeks per year.

The refinery is organized into five complexes for operations and maintenance purposes. Complex I has the Crude and Vacuum Units; Complex II consists of the Unifiner, Alkylation, Sulfur Recovery units; Complex III includes the Fluid Catalytic Cracking Unit (FCCU) and other Light Ends Units; Complex IV includes the Catalytic Reformers, Hydrotreaters, and Boilers; and Complex V contains the storage and blending facilities, as well as the Marine Loading Facilities. The Refinery operations are controlled by a Distributed Control Computer System.

Crude oil is the raw material the Refinery utilizes to create finished products such as fuels and asphalt. The Refinery is staged such that processing alters the physical and chemical state of the crude oil which in turn produces marketable products. Both sweet and sour crude oils are processed at the Detroit Refinery. Sour Crude contains a higher content of sulfur components than sweet crude. All crude oil is pipelined into the Refinery. Other raw material may be brought into the refinery by pipeline or is transported in trucks including Iso-butane, n-butane, toluene, xylene, ethanol, gas oil and catalysts.

Many process units are equipped with control devices and emission monitoring devices.

### **Section 1- Detroit Refinery**

Major processing units and or emission groups at the Detroit Refinery (Section 1) include:

**Crude Unit: EU05-CRUDE** Crude oil is a complex mixture of chemical compounds known as hydrocarbons. Light crude tend to have more gasoline and kerosene, while heavy crude have more gas oil and residual oil. Sweet crude tend to have low amounts of sulfur and hydrogen sulfide (H<sub>2</sub>S) while sour crudes are characterized by their high hydrogen sulfide content.

The function of the Crude unit is to separate the crude oil into various fractions based on their relative boiling points (temperatures). These fractions are then sent to other units in the Refinery for further processing.

**Vacuum Unit: EU04-VACUUM** The heavy residue from the Crude Unit (topped crude) is heated and pumped to a vacuum distillation tower. By lowering the pressure within the tower, the boiling points of the oils are greatly reduced making possible further distillation and recovery of high quality gas oil for catalytic cracking. The vacuum tower “bottoms” are used to produce asphalt for highways and roofing shingles.

**Naphtha Hydrotreater: EU16-NAPHHYTREAT** The Naphtha Hydrotreater prepares naphtha (low octane gasoline from crude oil) to be Platformer charge stock by removing sulfur from the naphtha. Sulfur is a contaminant in the platforming (catalytic reforming) process.

**Catalytic Reformer: EU14-CCRPLCATREG** Catalytic reforming is a process by which low octane naphtha is converted or “reformed” to high octane gasoline. The Refinery has one Platformer unit that uses high temperatures and a platinum/rhenium catalyst in the presence of hydrogen to convert low octane naphthas or straight-run gasoline into high octane motor fuel blending stocks. Hydrogen, the “by-product” of the reforming process, is used in hydrotreating units to remove sulfur from other streams.

**Kerosene Hydrotreater: EU19-KEROHYTREAT** Sulfur, Nitrogen, and other impurities are removed from kerosene to improve its quality. The kerosene feed reacts with hydrogen over a catalyst bed to remove the sulfur. The low sulfur kerosene production from this unit is of jet fuel quality.

**Fluid Catalytic Cracking Unit: EU11-FCCU** Gas oil is a heavy, waxy material that is distilled from crude oil. The function of the FCCU is to crack the gas oil into lighter compounds such as gasoline, heating oil, and liquefied petroleum gas (LPG), thereby increasing the yield of gasoline from a given quantity of crude oil. “Cracking” is done under high temperature in the presence of an alumina catalyst in the form of a fluidized bed.

**Gas Concentration Unit (GAS CON): EU12-GASCON** This unit gathers light ends (gases) primarily from the FCCU, compresses and cools them, and then separates them according to product types into fuel gas, propane/propylene and gasoline, and a mixed butane stream for the Alkylation Unit feed.

**Propylene Unit: EU13-PROPYLENE** The Propylene Unit is a distillation unit that separates the propane/propylene mix stream into propane and propylene products. The propane is sold or used as fuel (LPG). The propylene is primarily sold to the petrochemical industry as a feedstock.

**Alkylation Unit: EU09-ALKYLATION** Alkylation combines isobutane with olefins in the presence of concentrated sulfuric acid (a catalyst) to form alkylate, a high octane, gasoline blending component, principally iso-octane.

**Gas Oil/Distillate Hydrotreater: EU07-GOUNIFINER** Distillates and gas oils are desulfurized to remove sulfur and nitrogen. The Hydrotreater reacts organic sulfur impurities with hydrogen over a catalyst bed.

**Sulfur Recovery: EU42-43SULRECOV** The refinery has three Sulfur Recovery Units and two Tail Gas Treating Units. The Sulfur Recovery Units convert hydrogen sulfide (H<sub>2</sub>S) into elemental sulfur. This occurs in thermal and catalytic reactors. The Tail Gas Treating Units remove and recycle any unconverted hydrogen sulfide to achieve an overall sulfur recovery of approximately 99.99%.

**Zurn Boiler: EU27-ZURNBOILER** The Zurn Boiler is a steam production unit which uses natural gas as fuel. Produced steam is distributed throughout the refinery to supply heat, drive turbines, and assist fractionation operations.

**Waste Water Treatment: EU29-WASTEWATER** Waste water from the Refinery is discharged to the City of Detroit sewer system after treatment to remove any hydrocarbons and adjust for pH. The Refinery’s waste water is composed of process water from units and storm water run-off.

**Tank Farm Areas: EU22-TANKFARMS** This emission group includes storage tanks in three areas: the Melvindale tank farm, the Crude tank farm and the Cracking Plant tank farm. The Melvindale tank farm is located in the City of Melvindale across Schaefer Road from the Refinery.

**Rouge Terminal: EU38-ROUGETERMNL** This facility, located at 301 South Fort Street, Detroit, at the Rouge River, is used for the storage and barge loading of asphalts and heavy oils. The asphalt truck loading racks on this same site are operated under separate management and are permitted under Section 2.

**Section 2- Detroit Terminal**

Major emission groups at the Detroit Light Product Terminal (Section 2) include:

**EUNLOADING-RACKS:** Multi-lane tank truck cargo loading

**EUASPHALT-** Multi-lane truck loading rack for asphalt

**FGGASADDTANK:** Gasoline additive for tank truck cargoes (two 10,000 gallon tanks)

**EUHORACKS:** Dual lane tank truck heavy/industrial fuel oil cargo loading

**FGASHPOLYTANKS:** Storage tanks for asphalt containing a special polymer additive

The Detroit Terminal is located adjacent to the refinery main office on Fort Street with access on Toronto Street. The terminal has five tanker truck loading lanes with 17 computer controlled automatic loading arms. The facility uses an adsorption type vapor recovery unit primarily and a portable flare backup vapor control device during extended outages of the primary device. The vapor recovery unit is equipped with a continuous emission monitoring device. Products supplied at the Detroit Terminal include gasoline, LPG, home heating oils, diesel fuels, and heavy industrial fuel oils. The flexible emission group FGASHPOLYTANKS is located at the Rouge Terminal at 301 South Fort Street in Detroit.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System in the **2010** submittal.

**TOTAL STATIONARY SOURCE EMISSIONS**

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide (CO)	99
Lead (Pb)	0
Nitrogen Oxides (NO <sub>x</sub> )	402
Particulate Matter (PM)	92
Sulfur Dioxide (SO <sub>2</sub> )	104
Volatile Organic Compounds (VOCs)	615
<b>Individual Hazardous Air Pollutants (HAPs) **</b>	
<b>Total Hazardous Air Pollutants (HAPs)</b>	

\*\*As listed pursuant to Section 112(b) of the federal Clean Air Act.

In addition to the pollutants listed above that have been reported in MAERS, the potential to emit of Greenhouse Gases in tons per year of CO<sub>2</sub>e is greater than 100,000 CO<sub>2</sub>e. CO<sub>2</sub>e is a calculation of the combined global warming potentials of six Greenhouse Gases (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride).

See Parts C and D in the draft ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

## **Regulatory Analysis**

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

Wayne County is currently designated by the U.S. Environmental Protection Agency (USEPA) as a non-attainment area with respect to PM 2.5 standards.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR), Part 70, because:

- the potential to emit all criteria pollutants exceeds 100 tons per year.
- the potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112, is more than 10 tons per year and the potential to emit of all HAPs combined is more than 25 tons per year.
- the potential to emit of Greenhouse Gases is 100,000 tons per year or more calculated as carbon dioxide equivalents (CO<sub>2</sub>e) and 100 tons per year or more on a mass basis.

The stationary source is subject to Prevention of Significant Deterioration of Title 40 of the Code of Federal Regulations, Part 52.21, regulations because its potential to emit of criteria pollutants is greater than 100 tons per year.

At this time, there are no GHG applicable requirements to include in the ROP. The mandatory Greenhouse Gas Reporting Rule under 40 CFR 98 is not an ROP applicable requirement and is not included in the ROP.

The stationary source is subject to R 336.1220 for Major Offset Sources.

The stationary source has emission units in Section 1 and 2 that are subject to the following New Source Performance Standards (NSPS):

- ◆ 40 CFR 60, Subpart QQQ-Standards of Performance for VOC emissions from Petroleum Refinery Waste Water Systems,
- ◆ 40 CFR 60, Subpart GGG-Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries, 40 CFR 60,
- ◆ Subpart J-Standards of Performance for Petroleum Refineries,
- ◆ 40 CFR 60, Subpart VV-Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry,
- ◆ 40 CFR 60, Subpart UU-Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture,
- ◆ 40 CFR 60, Subpart Kb-Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for which construction, Reconstruction, or Modification commenced after July 23, 1984,
- ◆ 40 CFR 60, Subpart Db-Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, and
- ◆ 40 CFR 60, Subpart Dc-Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.
- ◆ New Source Performance Standards (NSPS) 40 CFR 60, Subpart XX-Standards of Performance for Bulk Gasoline Terminals.

The stationary source has emission units in Section 1 or 2 that are subject to the following Maximum Achievable Control Technology Standards:

- ◆ 40 CFR 63, Subpart R-National Emission Standards for Hazardous Air Pollutants from Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations),
- ◆ Petroleum Refinery MACT, 40 CFR 63, Subpart CC-National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries,
- ◆ 40 CFR 63, Subpart UUU, National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units and Sulfur Recovery Units.

The stationary source has emission units in Section 1 and 2 that are subject to the following National Emission Standard for Hazardous Air Pollutants:

- ◆ 40 CFR 61, Subpart FF-National Emission Standard for Benzene Waste Operations,

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the DEQ "Procedure for Evaluating Periodic Monitoring Submittals."

The emission standard for Particulate Matter from EU11-FCCU-S1 at the stationary source is exempt from the federal Compliance Assurance Monitoring (CAM) rule under Title 40 of the Code of Federal Regulations (CFR), Part 64, because the Particulate Matter Standards are addressed by 40 CFR, Part 63, Subpart UUU. Therefore, EU11-FCCU-S1 is exempt from the CAM requirements for Particulate Matter.

The emission standard for Total Organic Compounds from EULOADINGRACKS-S2 at the stationary source is exempt from the federal Compliance Assurance Monitoring (CAM) regulation under Title 40 of the Code of Federal Regulations (CFR), Part 64, because the Total Organic Standards are addressed by 40 CFR, Part 63, Subpart R. Also, a Volatile Organic Compound Continuous Emission Monitoring System is used to monitor emissions from the exhaust of the vapor recovery unit. Therefore, EULOADINGRACKS-S2 is exempt from CAM requirements for Total Organic Compounds.

EU99-LPGLOADRACK-S1 is not subject to the federal Compliance Assurance Monitoring rule under 40 CFR, Part 64, because the potential pre-control emissions are not over the major source thresholds.

EU22-LPGRAILRACK-S1 is not subject to the federal Compliance Assurance Monitoring rule under 40 CFR, Part 64, because the potential pre-control emissions are not over the major source thresholds.

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

### **Source-wide Permit to Install (PTI)**

Rule 214a requires the issuance of a Source-wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document. PTIs issued after the effective date of ROP No. 199700013c are identified in Appendix 6 of the ROP.

The following table lists all individual PTIs that were incorporated into previous ROPs.



PTI Number			
Wayne County Permit C-11741 5-98	Wayne County Permit C-6779	108-02	198-02
184-03	Wayne County Permit C-11493 –11496, and Wayne County Permit C-11498	232-02	236-02
244-00	Wayne County Permit C-9603-9605	28-02	28-02A
Wayne County Permit C-9022-9023	Wayne County Permit C-8305	67-02	67-02A
Wayne County Permit C-10393	Wayne County Permit C-8534	262-02	63-04
120-99	Wayne County Permit C-7167	175-06	C-9941
90-98	61-99	195-00	236-02

### **Equivalent Requirements**

The following table lists explanations of any equivalent requirements included in the draft permit pursuant to Rule 213(2)(c). Equivalent requirements are enforceable applicable requirements which are equivalent to the applicable requirements contained in the original PTI, a Consent Order/Judgment, and/or the State Implementation Plan.

<b>Emission Unit/Flexible Group ID</b>	<b>Equivalent Requirement Discussion</b>
EU11-FCCU-S1	The PM limit of .8 lbs/ 1000 lbs coke burn off is more stringent than both the NSPS which has a limit of 2 lbs/ton coke burn off, and the limit of 1 lb/ 1000 lbs coke burn off which is enforced in the Consent Decree between Marathon and the USEPA and US Justice Department.
EU27-B&WBOILER1	The H2S content of refinery fuel gas limit of .10 grains/dry standard cubic foot is more stringent than the Michigan State Rule 406 which has a limit of 100 grains/ 100 standard cubic feet.
FGHEATERS-S1	The H2S content of refinery fuel gas limit of .10 grains/dry standard cubic foot is more stringent than the Michigan State Rule 406 which has a limit of 100 grains/ 100 standard cubic feet.
FGFLARES-S1	The H2S content of refinery fuel gas limit of .10 grains/dry standard cubic foot is more stringent than the Michigan State Rule 406 which has a limit of 100 grains/ 100 standard cubic feet.
FGPROCVENTS-S1	The H2S content of refinery fuel gas limit of .10 grains/dry standard cubic foot is more stringent than the Michigan State Rule 406 which has a limit of 100 grains/ 100 standard cubic feet.
EU42-43SULRECOV-S1	The SO2 emission limit of 91 TPY is more stringent than the Michigan State Rule 405 which has a limit of .01 pounds SO2/Pound Sulfur Produced. This is calculated by using the emission limit and material limit in the ROP.
EU21-S2OFFGAS-S1	The H2S content of refinery fuel gas limit of .10 grains/dry standard cubic foot is more stringent than the Michigan State Rule 406 which has a limit of 100 grains/ 100 standard cubic feet.

**Non-applicable Requirements**

Part E of the draft ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the draft ROP pursuant to Rule 213(6)(a)(ii).

**Processes in Application Not Identified in Draft ROP**

The following table lists processes that were included in the ROP application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

<b>Exempt Emission Unit ID</b>	<b>Description of Exempt Emission Unit</b>	<b>ROP Exemption</b>	<b>PTI Permit Exemption</b>
DV07-C1	Gas Oil Unifiner Hydrogen-Gas Compressor 1	R 336.1212(f)	R 336.1285(g)
DV07-C2	Gas Oil Unifiner Hydrogen-Gas Compressor 2	R 336.1212(f)	R 336.1285(g)
DV07-C3	Gas Oil Unifiner Hydrogen-Gas Compressor 3	R 336.1212(f)	R 336.1285(g)
DVMACHINEEQPT	Machining Equipment: Grinders, Cutters, Sanders	R 336.1212(3)(d)	R 336.1285(i)(vi)
DVTANK80	Tank 80 (Capacity = 21336 gallons)	R 336.1213(3)(c)	R 336.1284(b)
DVTANK81	Tank 81 (Capacity = 21336 gallons)	R 336.1213(3)(c)	R 336.1284(b)
DVTANK82	Tank 82 (Capacity = 25536 gallons)	R 336.1213(3)(c)	R 336.1284(b)
DVTANK83	Tank 83 (Capacity = 25536 gallons)	R 336.1213(3)(c)	R 336.1284(b)
DVTANK84	Tank 84 (Capacity = 14112 gallons)	R 336.1213(3)(c)	R 336.1284(b)
DVTANK89	Tank 89 (Capacity = 30072 gallons)	R 336.1213(3)(c)	R 336.1284(b)
DVTANK90	Tank 90 (Capacity = 30072 gallons)	R 336.1213(3)(c)	R 336.1284(b)
DVTANK91	Tank 91 (Capacity = 21798 gallons)	R 336.1213(3)(c)	R 336.1284(b)
DVTANK92	Tank 92 (Capacity = 21798 gallons)	R 336.1213(3)(c)	R 336.1284(b)
DVTANK93	Tank 93 (Capacity = 21798 gallons)	R 336.1213(3)(c)	R 336.1284(b)
DVTANK94	Tank 94 (Capacity = 20664 gallons)	R 336.1213(3)(c)	R 336.1284(b)
DVTANK95	Tank 95 (Capacity = 20664 gallons)	R 336.1213(3)(c)	R 336.1284(b)
DVTANK98	Tank 98 (Capacity = 20664 gallons)	R 336.1213(3)(c)	R 336.1284(b)
DVTANK99	Tank 99 (Capacity = 20664 gallons)	R 336.1213(3)(c)	R 336.1284(b)
DVTANK190	Tank 190 (Capacity =20664 gallons)	R 336.1213(3)(c)	R 336.1284(b)
DVTANK191	Tank 191 (Capacity =20664 gallons)	R 336.1213(3)(c)	R 336.1284(b)
DVTANK181	Tank181 (Capacity = 504 gallons)	R 336.1213(3)(c)	R 336.1284(d)
DVTANK511	Tank511 (Capacity = 21,000 gallons)	R 336.1213(3)(c)	R 336.1284(h)
DVTANK526	Tank526(Capacity = 14,700 gallons)	R 336.1213(3)(c)	R 336.1284(h)
DVTANK528	Tank528(Capacity = 14,700 gallons)	R 336.1213(3)(c)	R 336.1284(h)
DVTANK529	Tank529(Capacity =2940 gallons)	R 336.1212(4)	R 336.1284(i)
DVTANK532	Tank532(Capacity =4000 gallons)	R 336.1212(3)	R 336.1284(c)
DVTHERMHTRS N/S	Therminol Heaters at Rouge Terminal	R 336.1213(3)(c)	R 336.1282(b)(i)
DVASPHALTHTR	Melvindale asphalt heater	R 336.1213(3)(c)	R 336.1282(b)(i)

### **Draft ROP Terms/Conditions Not Agreed to by Applicant**

The permit does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

### **Compliance Status**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

### **Action taken by the DEQ**

The AQD proposes to approve this permit. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the U.S. Environmental Protection Agency (USEPA) is allowed up to 45 days to review the draft permit and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Teresa Seidel, Field Operations Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

Michigan Department of Environmental Quality  
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**RENEWABLE OPERATING PERMIT**  
**August 10, 2012 STAFF REPORT**  
**ADDENDUM**

ROP Number  
MI-ROP-A9831-2012

**Purpose**

A Staff Report dated March 26, 2012, was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in R 336.1214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

**General Information**

Responsible Official:	Section 1- Detroit Refinery C. Tracy Case Deputy Assistant Secretary 313-843-9100  Section 2- Detroit Terminal Bradley R. McKain Deputy Assistant Secretary 419-421-4422
AQD Contact:	Jorge Acevedo, Senior Environmental Engineer 313-456-4679

**Summary of Pertinent Comments**

The Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) received the following comments from the general public and the US Environmental Protection Agency, Region 5, during the public hearing conducted on May 2, 2012, and during the public comment period from March 26, 2012 to May 2, 2012:

**Comments received from the General Public**

**Comment 1**

Commenter is concerned about the monitoring and recordkeeping provisions in the draft Renewable Operating Permit and believes that the current monitoring requirements are not adequate to periodically monitor the emission limitations listed and their compliance. Commenter believes the clear calculations should correlate with the emission limits and that the emission limits and their testing align through the Renewable Operating permit to ensure quality reporting and recordkeeping.

### AQD Response 1

The purpose of the Renewable Operating permit is to ensure that adequate testing, monitoring, and recordkeeping provisions to demonstrate compliance with applicable limits are in the permit. There are numerous instances where the monitoring and testing requirements correlate to the emission limits. For example, in Table EU27-B&WBOILER1-S1, on page 54, there are limits for Nitrogen Oxides, Carbon Monoxide, Particulate Matter and Particulate Matter 10(coarse particulates 10 micrometers and smaller). There are limits on a Yearly basis, for Nitrogen Oxides and Carbon Monoxide emissions, evaluated on a rolling monthly basis. To ensure that Marathon is meeting the emission limits, there are requirements for Marathon to operate Continuous Emission Monitoring Systems to measure and record Nitrogen Oxide and Carbon Monoxide Emissions on a continuous basis. For the Particulate Matter and Particulate Matter 10 emission limits, there are requirements in the permit for Marathon to perform emission testing to measure Particulate Matter and Particulate Matter 10. At this time, AQD believes the draft renewal contains adequate measures.

### Comment 2

Commenter questioned how people who live in the vicinity of the Refinery will be notified in the event that "leaks" or other issues are experienced at the plant.

### AQD Response 2

AQD's authority is limited such that it only requires the facility to address any excess emissions that may result from malfunctions. The Local Emergency Planning Commission, Marathon's Emergency Response Team, and local emergency response agencies are available for other emergency concerns.

### Comment 3

Commenter questioned about the air quality testing done in the neighborhood adjacent to the Refinery.

### AQD Response 3

This comment is outside the scope of the Renewable Operating Permit process. AQD believes the commenter is referencing air sampling in the neighborhood adjacent to the Refinery done by Marathon Petroleum Company. The air sampling was done in conjunction with the US Environmental Protection Agency, On-Scene Coordinator, to determine whether benzene-containing wastewater was impacting ambient air quality. Further information regarding the sampling can be found at the following website: [http://epaossc.org/site/site\\_profile.aspx?site\\_id=6646](http://epaossc.org/site/site_profile.aspx?site_id=6646)

### Comment 4

Commenter stated that with the health issues in the area and various industries, AQD should take into account the cumulative problems that exist instead of looking at individual companies.

### AQD Response 4

The Renewable Operating Permit process is a vehicle for ensuring that all applicable requirements (ARs), as defined in R 336.1101(o), are appropriately applied to an air pollution source in a single document and that compliance with these requirements is assured [40 CFR §70.6(a), MCLS §324.5506(6), R 336.1213(2)]. R 336.1213 lists the content that the AQD may include in an ROP which encompasses all applicable requirements and the necessary monitoring, recordkeeping, reporting, and other conditions to determine the status of compliance of the stationary source. Additionally, the facility emission limits, air toxic analysis, and other applicable requirements (such as control technology requirements) are established based on certain criteria and parameters utilizing the most current State

and Federal regulations at the time of the Permit to Install application process and as evaluated through New Source Review (NSR).

### **Comments received from US Environmental Protection Agency, Region 5**

#### **Comment 5**

Commenter stated that the Renewable Operating Permit did not have the underlying applicable requirement in several places throughout the permit.

#### **AQD Response 5**

AQD agrees with the comment and added the appropriate underlying applicable requirement on Page 42, condition 6, and Page 202, condition 28.

#### **Comment 6**

Commenter stated that conditions stemming from PTI 175-06 would not carry over if the Consent Decree expires and that appropriate underlying applicable requirements be added to ensure the conditions carry forward when the Consent Decree expires.

#### **AQD Response 6**

AQD agrees with the comment and added appropriate underlying applicable requirements in addition to the Consent Decree underlying applicable requirement at Page 100, Condition 8, Page 202, Condition 27, and Page 202, condition 29.

### **Changes to the March 26, 2012 Draft ROP**

The changes are specified in the above AQD Response 5 and AQD Response 6.

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number

A9831

**RENEWABLE OPERATING PERMIT**  
**December 18, 2012 STAFF REPORT FOR RULE**  
**217(2) REOPENING**

ROP Number

MI-ROP-A9831-2012a

**Purpose**

On September 27, 2012, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-A9831-2012 to Marathon Petroleum Company LP pursuant to R 336.1214. Once issued, the AQD is required to reopen the ROP if the criteria described in R 336.1217 are met. Only those conditions to be added or changed in the ROP are to be considered during this public comment period. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1217.

**General Information**

Responsible Official:	Section 1- Detroit Refinery C. Tracy Case, Deputy Assistant Secretary 313-843-9100  Section 2- Detroit Terminal Bradley R. McKain, Deputy Assistant Secretary 419-421-4422
AQD Contact:	Brian Carley, Environmental Quality Specialist 517-780-7843
Date Public Comment Begins:	February 25, 2013
Deadline for Public Comment:	March 27, 2013

**Regulatory Analysis**

The AQD has determined that the ROP must be reopened because for the inclusion of the Clean Air Interstate Rule (CAIR) Nitrogen Oxide (NOx) Ozone Permit into the ROP.

This permit must be complete and separable portion of the ROP per the requirements of 40 CFR 97.320 and R 336.1821(2).

**Description of Changes to the ROP**

Incorporated the CAIR NOx Ozone Permit into the ROP as Appendix 9-S1. The requirements to comply with the CAIR Ozone Nitrogen Oxide Budget Permit and the requirements to have the appropriate amount of allowances in their accounts were added to Section IX of Table EU27-B&WBOILER1-S1. Also in Table EU27-B&WBOILER1-S1, the description of the boiler, Section I, footnote (b) and Section IV, S.C. 1 and 4 the capacity was changed from 249 MMBtu/hr to 300 MMBtu/hr. The description was further changed to 200,000 pounds steam per hour from 190,000 pounds steam per hour at 600 psig. These changes were done to reflect that the unit is now subject to CAIR Ozone NOx Budget program and were allowed per Permit to Install 63-08C.

### **Action Taken by the Department**

The AQD proposes to approve this change to ROP No. MI-ROP-A9831-2012a, which was reopened by the AQD in order to incorporate the CAIR NOx Ozone Permit into the ROP per 40 CFR 97.320 and 336.1821(2). A final decision on the approval of the revised ROP will not be made until the public and any affected states have had an opportunity to comment on the proposed changes to the ROP and the U.S. Environmental Protection Agency (USEPA) has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is Wilhemina McLemore, Detroit District Supervisor. The final determination for approval of the revised ROP will be based on a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by the public, any affected states or the USEPA.



Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number  
A9831

**RENEWABLE OPERATING PERMIT**  
**April 1, 2013 STAFF REPORT ADDENDUM FOR**  
**RULE 217(2) REOPENING**

ROP Number  
MI-ROP-A9831-2012

**Purpose**

A Staff Report dated February 25, 2013, was developed in order to set forth the applicable requirements and factual basis for the draft reopening to Renewable Operating Permit's (ROP) terms and conditions as required by R 336.1214(3). The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP reopening during the 30-day public and affected state(s) comment period as described in R 336.1214(3) and (4). In addition, this addendum describes any changes to the proposed ROP reopening resulting from these pertinent comments.

**General Information**

Responsible Official:	Section 1- Detroit Refinery C. Tracy Case, Deputy Assistant Secretary 313-843-9100  Section 2- Detroit Terminal Bradley R. McKain, Deputy Assistant Secretary 419-421-4422
AQD Contact:	Brian Carley, Environmental Quality Specialist 517-780-7843

**Summary of Pertinent Comments**

No pertinent comments were received during the 30-day public comment period.

**Changes to the February 25, 2013 Draft ROP Reopening**

No changes were made to the draft ROP reopening.

State Registration Number  
A9831

**RENEWABLE OPERATING PERMIT**  
**May 20, 2013 STAFF REPORT ADDENDUM FOR**  
**RULE 217(2) REOPENING**

ROP Number  
MI-ROP-A9831-2012a

**Purpose**

A Staff Report dated April 1, 2013, was developed in order to set forth the applicable requirements and factual basis for a proposed reopening to Renewable Operating Permit's (ROP) terms and conditions as required by R 336.1214(3). The purpose of this Staff Report Addendum is to summarize any significant comments received on the proposed ROP reopening during the U.S. Environmental Protection Agency's (USEPA), 45-day comment period as described in R 336.1214(3). In addition, this addendum describes any changes to the proposed ROP reopening resulting from these pertinent comments.

**General Information**

Responsible Official:	Section 1- Detroit Refinery C. Tracy Case, Deputy Assistant Secretary 313-843-9100  Section 2- Detroit Terminal Bradley R. McKain, Deputy Assistant Secretary 419-421-4422
AQD Contact:	Brian Carley, Environmental Quality Specialist 517-780-7843

**Summary of Pertinent Comments**

No pertinent comments were received during the USEPA's 45-day comment period.

**Changes to the April 1, 2013 Proposed ROP Reopening**

No changes were made to the proposed ROP reopening.

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number  
A9831

**RENEWABLE OPERATING PERMIT**  
**November 6, 2013 STAFF REPORT FOR RULE**  
**216(2) MINOR MODIFICATION**

ROP Number  
MI-ROP-A9831-2012b

**Purpose**

On May 20, 2013, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-A9831-2012a to Marathon Petroleum Company LP pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(2).

**General Information**

Responsible Official:	Timothy J. Aydt, Deputy Assistant Secretary
AQD Contact:	Kirsten S. Clemens, P.E., Environmental Engineer 269-567-3548
Application Number(s):	201300109, 201300111; 201300138
Date Applications For Minor Modification Were Submitted:	June 26, 2013; August 22, 2013

**Regulatory Analysis**

The AQD has determined that the changes requested by the stationary source meet the qualifications for a Minor Modification pursuant to R 336.1216(2).

**Description of Changes to the ROP**

Application No. 201300109: Incorporate PTI No. 63-04B for revising EULOADINGRACKS-S2.

Application No. 201300111: Incorporate PTI No. 63-04C for revising EULOADINGRACKS-S2.

PTI Nos. 142-11A and 148-11A were issued on the same date as PTI No. 197-10B. These PTI are for Section 1 of the ROP and are included in Administrative Amendment application nos. 201300136 and 201300137.

Application No. 201300138: Incorporate PTI No. 81-12 revising EU11-FCCU-S1, EU42-43SULRECOV-S1, EU-COKERFLARE-S1 and FG-FLARES-S1.

**Compliance Status**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

**Action Taken by the DEQ**

The AQD proposes to approve the Minor Modification to ROP No. MI-ROP-A9831-2012b, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the U.S. Environmental Protection Agency (USEPA) has been allowed 45 days

to review the proposed changes to the ROP. The delegated decision maker for the AQD is the District Supervisor. The final determination for approval of the Minor Modification will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by any affected states or the USEPA.

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number  
A9831

**RENEWABLE OPERATING PERMIT**  
**November 6, 2013 STAFF REPORT FOR RULE**  
**216(1)(a)(v) ADMINISTRATIVE AMENDMENT**

ROP Number  
MI-ROP-A9831-2012b

**Purpose**

On May 20, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-A9831-2012a to Marathon Petroleum Company LP pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(1)(a)(v).

**General Information**

Responsible Official:	Timothy J. Aydt, Deputy Assistant Secretary
AQD Contact:	Kirsten S. Clemens, P.E., Environmental Engineer 269-567-3548
Application Number(s):	201300110, 201300135, 201300136, 201300137
Date Applications For Administrative Amendment Were Submitted:	June 26, 2013, August 22, 2013

**Regulatory Analysis**

The stationary source has requested that the Permit to Install (PTI) Nos. 197-10B (issued September 13, 2012), 96-11 (issued January 11, 2012), 148-11A (issued September 13, 2012) and 142-11A (issued September 13, 2012) be incorporated into their ROP. The AQD has determined that the change requested meets the following criteria for an Administrative Amendment pursuant to Rule 216(1)(a)(v): the PTI includes terms and conditions that comply with the permit content requirements contained in Rule 213; the procedure used to issue the PTI was substantially equivalent to the requirements of Rule 214 regarding public participation and review by affected states; and the process or process equipment is in compliance with, and no changes are required to, the terms and conditions of the PTI that are to be incorporated into the ROP. Also, the permittee notified the AQD in writing within 30 days of commencing operation of the processes covered by the PTI and has submitted certified results of all required testing, monitoring and recordkeeping performed to demonstrate compliance with the PTI.

**Description of Changes to the ROP**

Application No. 201300110: Incorporate PTI No. 197-10B to add conditions for EU\_ASPHALT and FGASPHALTLOADING to Section 2.

Application No. 201300135: Incorporate PTI No. 96-11 to add FG-RAGLAYERTANKS-S1.

Application No. 201300136: Incorporate PTI No. 148-11A to add EU38-BARGELOAD-S1.

Application No. 201300137: Incorporate PTI No. 142-11A to add EU22-ASPHLOAD-S1.

PTI Nos. 142-11A and 148-11A were issued on the same date as PTI No. 197-10B (Minor Modification application no. 201300111).

### **Compliance Status**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the change as of the date of approval of the Administrative Amendment to the ROP.

### **Action Taken by the DEQ**

The AQD proposes to approve an Administrative Amendment to ROP No. MI-ROP-A9831-2012b, as requested by the stationary source. A final decision on the Administrative Amendment to the ROP will not be made until the U.S. Environmental Protection Agency (USEPA) has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is the District Supervisor. The final determination for approval of the Administrative Amendment will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by the USEPA.

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number  
A9831

**RENEWABLE OPERATING PERMIT**  
**November 6, 2013 STAFF REPORT FOR RULE 216(4)**  
**STATE-ONLY MODIFICATION**

ROP Number  
MI-ROP-A9831-2012b

**Purpose**

On May 20, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-A9831-2012a to Marathon Petroleum Company LP pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(4).

**General Information**

Responsible Official:	Timothy J. Aydt, Deputy Assistant Secretary
AQD Contact:	Kirsten S. Clemens, P.E., Environmental Engineer 269-567-3548
Application Number:	201300112
Date Application For State-Only Modification Was Submitted:	June 26, 2013

**Regulatory Analysis**

The AQD has determined that the change requested by the stationary source meets the qualifications for a State-Only Modification pursuant to R 336.1216(4).

**Description of Changes to the ROP**

Change in stack height for SVVRU-PORT of EULOADINGRACKS-S2 from 32.3 feet to 13 feet.

**Compliance Status**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the State-Only Modification to the ROP.

**Action Taken by the DEQ**

The AQD approved a State-Only Modification to ROP No. MI-ROP-A9831-2012b, as requested by the stationary source. The delegated decision maker for the AQD is the District Supervisor.

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number

A9831

**RENEWABLE OPERATING PERMIT**

ROP Number

**January 16, 2014 STAFF REPORT ADDENDUM FOR MI-ROP-A9831-2012b  
RULE 216(2) MINOR MODIFICATION**

**Purpose**

A Staff Report dated November 6, 2013, was developed in order to set forth the applicable requirements and factual basis for the proposed Minor Modification to the Renewable Operating Permit's (ROP) terms and conditions as required by R 336.1216(2)(c). The purpose of this Staff Report Addendum is to summarize any significant comments received on the proposed ROP modification during the U.S. Environmental Protection Agency's (USEPA) 45-day comment period as described in R 336.1216(2)(c). In addition, this addendum describes any changes to the proposed ROP Minor Modification resulting from these pertinent comments.

**General Information**

Responsible Official:	Timothy J. Aydt, Deputy Assistant Secretary
AQD Contact:	Kirsten S. Clemens, P.E., Environmental Engineer 269-567-3548

**Summary of Pertinent Comments**

No pertinent comments were received during the USEPA's 45-day comment period.

**Changes to the November 6, 2013 Proposed ROP Minor Modification**

No changes were made to the proposed ROP Minor Modification.



**RENEWABLE OPERATING PERMIT**  
**January 16, 2014 STAFF REPORT ADDENDUM**  
**FOR RULE 216(1)(a)(v) ADMINISTRATIVE**  
**AMENDMENT**

**Purpose**

A Staff Report dated November 6, 2013, was developed in order to set forth the applicable requirements and factual basis for the proposed Administrative Amendment to Renewable Operating Permit's (ROP) terms and conditions as required by R 336.1216(1)(c). The purpose of this Staff Report Addendum is to summarize any significant comments received on the proposed ROP Administrative Amendment during the U.S. Environmental Protection Agency's (USEPA), 45-day comment period as described in R 336.1216(1)(c). In addition, this addendum describes any changes to the proposed ROP Administrative Amendment resulting from these pertinent comments.

**General Information**

Responsible Official:	Timothy J. Aydt, Deputy Assistant Secretary
AQD Contact:	Kirsten S. Clemens, P.E., Environmental Engineer 269-567-3548

**Summary of Pertinent Comments**

No pertinent comments were received during the USEPA's 45-day comment period.

**Changes to the November 6, 2013 Proposed ROP Administrative Amendment**

No changes were made to the proposed ROP Administrative Amendment.

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number  
A9831

**RENEWABLE OPERATING PERMIT**  
**July 8, 2016 STAFF REPORT FOR RULE 216(2)**  
**MINOR MODIFICATION**

ROP Number  
MI-ROP-A9831-2012c

**Purpose**

On January 16, 2014, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-A9831-2012b to Marathon Petroleum Company LP pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(2).

**General Information**

Responsible Official:	David T. Roland, MPC Investment LLC, General Partner Deputy Assistant Secretary  Honor F. Sheard, MPC Investment LLC, General Partner Deputy Assistant Secretary  Edward T. Gaslenwald, Plant Manager Air Products and Chemicals, Inc. - Detroit Hydrogen Plant
AQD Contact:	Caryn E. Owens, Environmental Engineer 231-876-4414
Application Numbers:	201300158; 201300178; 201400103; 201400171
Dates Application For Minor Modifications Were Submitted:	October 23, 2013, June 23, 2014; November 5, 2014, February 17, 2015, June 17, 2016

**Regulatory Analysis**

The AQD has determined that the changes requested by the stationary source meet the qualifications for Minor Modification pursuant to R 336.1216(2).

**Description of Changes to the ROP**

Application No. 201300178: Incorporate PTI No. 18-12B.

Application No. 201400103: Incorporate PTI No. 54-13.

Application No. 201400171: Incorporate PTI No. 63-08D.

Application No. 201500033: Incorporate PTI No. 63-08D and create Section 3.

Application No. 201600111: Incorporate PTI No. 63-08E.

**Compliance Status**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

### **Action Taken by the DEQ**

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-A9831-2012b, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the U.S. Environmental Protection Agency (USEPA) has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is the District Supervisor. The final determination for approval of the Minor Modification will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by any affected states or the USEPA.

State Registration Number

A9831

**RENEWABLE OPERATING PERMIT**  
**September 12, 2016 - STAFF REPORT ADDENDUM**  
**FOR RULE 216(2) MINOR MODIFICATION**

ROP Number

MI-ROP-A9831-2012c

**Purpose**

A Staff Report dated July 8, 2016, was developed in order to set forth the applicable requirements and factual basis for the proposed Minor Modification to the Renewable Operating Permit's (ROP) terms and conditions as required by R 336.1216(2)(c). The purpose of this Staff Report Addendum is to summarize any significant comments received on the proposed ROP modification during the U.S. Environmental Protection Agency's (USEPA) 45-day comment period as described in R 336.1216(2)(c). In addition, this addendum describes any changes to the proposed ROP Minor Modification resulting from these pertinent comments.

**General Information**

Responsible Official:	David T. Roland, MPC Investment LLC, General Partner Deputy Assistant Secretary  Honor F. Sheard, MPC Investment LLC, General Partner Deputy Assistant Secretary  Edward T. Gaslenwald, Plant Manager Air Products and Chemicals, Inc. - Detroit Hydrogen Plant
AQD Contact:	Caryn E. Owens, Environmental Engineer 231-876-4414

**Summary of Pertinent Comments**

No pertinent comments were received during the USEPA's 45-day comment period.

**Changes to the July 8, 2016 Proposed ROP Minor Modification**

No changes were made to the proposed ROP Minor Modification.