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# Marathon Petroleum Company LP

## RESPONSE TO COMMENTS DOCUMENT

September 1, 2022

PERMIT No. 113-22

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Gretchen Whitmer, Governor

**Air Quality Division**  
**Michigan Department of Environment, Great Lakes, and Energy**

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## PUBLIC PARTICIPATION PROCESS

Permit to Install (PTI) application No. APP-2022-0004, for Marathon Petroleum Company LP (Marathon), was a request to optimize the sulfur production at the two sulfur recovery units at the facility located at 1001 South Oakwood Boulevard, Detroit, Michigan. The public participation process involved providing information for public review including:

- One location for information about the facility and associated Air Quality Division (AQD) actions at [Michigan.gov/EGLEMarathon](https://Michigan.gov/EGLEMarathon) and on the [AQD Permit to Install \(PTI\) Applications of Interest \(michigan.gov\)](#) webpage.
- Early release of the application and additional information received from Marathon.
- An application summary, provided in [English](#), [Spanish](#), and [Arabic](#).
- Additional outreach emails to share information on the application's progress with interested parties.
- A Proposed Project Summary, provided in [English](#), [Spanish](#), and [Arabic](#).
- A [Technical Fact Sheet](#).
- [Proposed permit terms and conditions](#).
- An extended public comment period.
- A virtual informational meeting and a virtual public hearing with an option for people to watch a broadcast of the hearing at the Kemeny Recreation Center at 2260 South Fort Street in Detroit.
- A [recording](#) of the public hearing.
- Acceptance of written and verbal public comments on AQD staff's analysis of the application and the proposed permit.

### Public Comment Period and Opportunities to Participate

On June 22, 2022, the public comment period was opened on the proposed air permit for Marathon. To notify the public about the comment period, AQD staff:

- Provided copies of the Notice of Air Permit Comment Period and Public Hearing, the [Proposed Project Summary](#), the [Technical Fact Sheet](#), and the [draft terms and conditions](#) on the AQD's Public Comment webpage at [Michigan.gov/EGLEAirPublicNotice](https://Michigan.gov/EGLEAirPublicNotice).
- Emailed letters to approximately 123 persons who had previously expressed interest and had provided a complete email address.
- An [announcement](#) about the Public Comment Period, virtual Public Informational Meeting, and virtual Public Hearing was placed in the *Michigan Chronicle*. The notice provided pertinent information regarding the proposed action; the locations of available information; a telephone number to request additional information; the date, time, and information for how to join the virtual public informational session and virtual public hearing; the closing date of the Public Comment Period; and the address, website, and phone number where comments were being received.
- A notice of the start of the comment period, the date of the public hearing, and the end of the comment period were posted on the [EGLE Calendar](#).
- An announcement and a follow up reminder about the comment period, public hearing, and associated details were shared via EGLE's subscription service to subscribers to the Air Quality and Environmental Justice topics.

- The notice ([Spanish notice](#), [Arabic notice](#)), letter ([Spanish letter](#), [Arabic letter](#)), and Proposed Project Summary ([Spanish Proposed Project Summary](#), [Arabic Proposed Project Summary](#)) were also translated into Arabic and Spanish and posted to the AQD's Public Comment webpage at [Michigan.gov/EGLEAirPublicNotice](https://Michigan.gov/EGLEAirPublicNotice).

The public informational session was held online on August 1, 2022. Approximately 36 people attended the virtual informational session and 7 people attended in person at the Kemeny Center. A panel of representatives from the AQD was available to answer questions regarding the proposed project. The meeting began at 6:00 p.m. and concluded at approximately 7:10 p.m. Following the informational session, a virtual public hearing was held the same night. The hearing began at approximately 7:12 p.m. with Jenifer Dixon as the hearings officer and Mary Ann Dolehanty as the decision maker. Only comments on the proposed permit action were received. Approximately 36 individuals attended the virtual public hearing with none providing oral comments. The virtual public hearing concluded at 7:28 p.m.

## Public Comments

A total of four sets of comments were received during the Public Comment Period.

The remainder of this document is a listing of the significant comments received during the public comment period regarding the proposed permit and the Department's response. The *Summary of Significant Comment* section below discusses the comments received and if changes were made to the final permit terms and conditions, the change(s) made and the basis for the change(s).

In this case, although comments were received, no changes to the final conditions resulted from those comments

## Summary of Significant Comments

### Comment

The air here in East Dearborn could be better. Please do what you can about Marathon, preferably shut them down.

### AQD Response

Marathon's request to change the sulfur production limits will not increase the emissions from the facility and will likely result in a decrease in emissions. The AQD evaluated the emissions from the increase in sulfur production that would be allowed at the North Plant and determined that the emissions of criteria pollutants and toxic air contaminants would comply with the applicable health-based regulations.

The AQD does not have the legal authority to revoke a permit or shut down a facility that is not in violation of their permit and/or the applicable air quality rules and regulations. Even when a facility is found to be in violation, the AQD does not have the legal authority to revoke a permit or shut down the facility without first giving the owner of the facility the opportunity to come into compliance through the AQD's [escalated enforcement](#) process. At this time, the AQD has not found that Marathon is in violation of their permit or the applicable rules and regulations.

Comment

The degree of pollution from the Marathon plant is already unacceptable. As a resident of Dearborn and former resident of River Rouge, the promises of Marathon are never honored. That poor area of town is becoming one industrial zone. Please deny the permit.

AQD Response

The AQD has determined that the permit contains all of the applicable regulatory requirements, including health-based limits, and has sufficient monitoring, testing, and recordkeeping to determine if Marathon is complying with the permit conditions. The AQD does not have the legal authority to deny issuance of a permit if the permit contains all of the applicable regulatory requirements and the permit conditions comply with those requirements.

Comment

Is the North plant twice as efficient as the East Plant? Are emissions coming out of the North Plant half of what they would be if they came out of the East Plant?

AQD Response

The efficiency of the two sulfur production units is not required for the permit application or for AQD staff to determine whether the requested changes would comply with applicable rules and regulations.

In the permit conditions, the East Plant has a sulfur dioxide (SO<sub>2</sub>) emission limit of 175 parts per million by volume (ppmv) while the North Plant has a limit of 100 ppmv. The North Plant will continue to meet this lower limit, even if Marathon increases the amount of sulfur produced there. To ensure these limits are being met, Marathon uses Continuous Emission Monitoring Systems (CEMS). A CEMS like this measures how much SO<sub>2</sub> is coming out of each stack several times per minute. AQD staff review the data from the monitors on a regular basis.

Another indication that the North Plant emissions are lower than the East Plant emissions can be seen in Table 1 of the [Technical Fact Sheet](#). The Baseline Actual Emissions of SO<sub>2</sub> from the two plants combined, when Marathon was producing sulfur in both plants, was 74.9 tons per year (tpy). Baseline Actual Emissions are the amount of SO<sub>2</sub> emitted over a two year period calculated from the CEMS data and then converted to an annual average. Marathon then estimated what the actual emissions would be if all of the sulfur production was done in the North Plant; this is called the "Projected Actual Emissions." That value is 32.6 tpy, for an emissions reduction of 42.3 tpy.

Comment

If the permit is approved and everything is switched to the North Plant, won't the people who live closest to the North Plant be subject to higher emissions?

AQD Response

The commenter is correct that, with the allowed increase in sulfur production at the North Plant, the annual emissions from the North Plant may be higher than they were before.

In order to evaluate how residents around the refinery may be impacted by the emissions, dispersion modeling was conducted. Dispersion modeling uses a computer program to look at the area around the facility to determine if potential impacts are less than health-based standards.

Table 3 in the [Technical Fact Sheet](#) shows the modeled impacts of SO<sub>2</sub>, particulate matter less than or equal to 2.5 microns in diameter (PM<sub>2.5</sub>), and particulate matter less than or equal to 10 microns in diameter (PM<sub>10</sub>) from producing sulfur in both plants. Table 4 from the [Technical Fact Sheet](#) shows the modeled impacts assuming all sulfur production is switched to the North Plant. Comparing these two scenarios (producing from both plants vs all production at the North Plant) shows the impacts of these pollutants are expected to be the same as, or lower than, they were before, as shown in Table A below.

NOTE: Values in the “*Difference in Predicted Impact*” column that are zero or negative indicate less impacts to surrounding areas.

**Table A – Comparison of Current to Proposed Operating Scenario SIL Modeling Results**

Pollutant	Averaging Time	Production at both plants	Production at North Plant	Difference in Predicted Impact (µg/m <sup>3</sup> )
		Current Predicted Impact (µg/m <sup>3</sup> )	Project Predicted Impact (µg/m <sup>3</sup> )	
SO <sub>2</sub>	1-hour	4.3	3.41	-0.89
SO <sub>2</sub>	3-hour	4.0	3.13	-0.87
SO <sub>2</sub>	24-hour	1.54	1.13	-0.41
SO <sub>2</sub>	Annual	0.16	0.11	-0.05
PM <sub>2.5</sub>	24-hour	0.412	0.406	-0.006
PM <sub>2.5</sub>	Annual	0.056	0.04	-0.016
PM <sub>10</sub>	24-hour	0.43	0.43	0
PM <sub>10</sub>	Annual	0.06	0.05	-0.01

#### Comment

I had my own impression that it looked like the amount of emissions would increase. This was confirmed to me by someone who’s very active on the south end of Dearborn and is very aware of pollution and so forth.

#### AQD Response

The commenter did not provide any information to substantiate the claim that emissions would increase. Based on Marathon’s application, the emissions are expected to stay the same or decrease as a result of the requested change in the North Plant throughput limit.

Emissions will be verified through stack testing and continuous emission monitoring.