



**Marathon Petroleum Company LP**

August 21, 2014

1300 South Fort Street  
Detroit, MI 48217  
Tel: 313.843.9100



VIA EMAIL and CERTIFIED MAIL

Jorge Acevedo  
Senior Environmental Engineer  
DEQ - Air Quality Division  
3058 West Grand Boulevard  
Suite 2-300  
Detroit, MI 48202

RE: In the Matter of Marathon Petroleum Company LP

Dear Mr. Acevedo:

This letter is in response to the August 1, 2014 Violation Notice issued to Marathon Petroleum Company (MPC) . In the Violation Notice, Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) has alleged the following violation based on MPC's stack test results:

Process Description	Rule/Permit Condition Violated	Comments
Zurn Boiler (EU27-ZURNBOILER-S1)	PTI 63-08D, EU27-ZURNBOILER-S1, Condition I.3 R336.1205 R336.2802 40 CFR 52.21	The Particulate Matter permit limit is 0.0019 lb/MMBtu. The stack test result was 0.0024 lb/MMBtu.

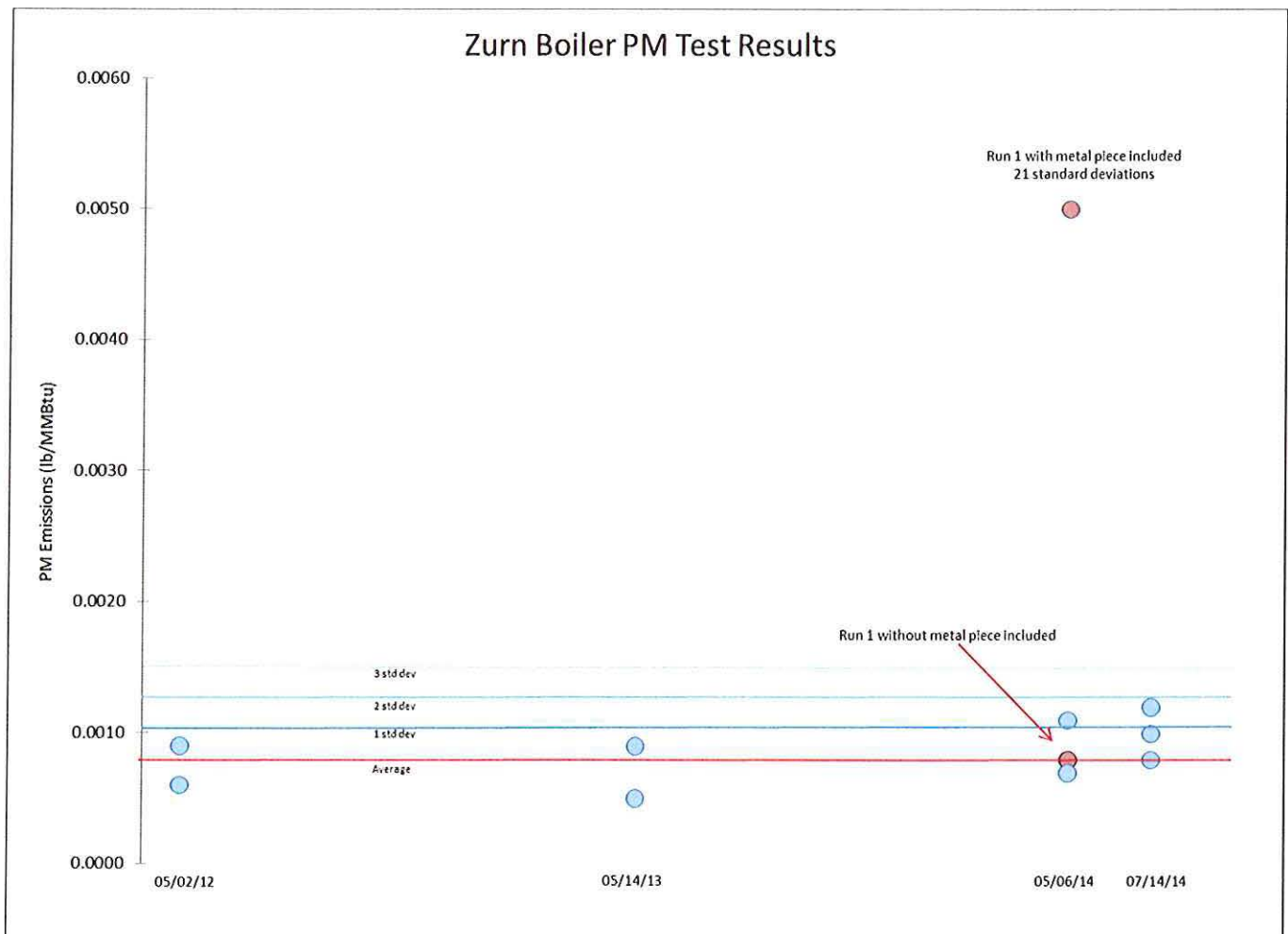
The permit limit at issue for the Zurn Boiler is EU27-ZURNBOILER, I.3. which establishes a particulate matter emission rate of 0.0019 lb/MMBTU. On May 6, 2014, MPC conducted an emission compliance test for particulate matter, assumed equivalent to filterable particulate matter (FPM), from the Zurn Boiler, a natural gas-fired unit. The stack testing was performed and the results analyzed by Clean Air Engineering (CleanAir), our stack testing contractor, in accordance with U.S. EPA Method 5. No abnormal operations were noted during the testing. The completed test report was submitted to the MDEQ-AQD on July 3, 2014.

As noted in the original test report, during the analytical portion of the testing, CleanAir discovered a foreign object in the front half acetone rinse from the first run. The object was magnetic and was not believed to be representative of the actual stack gas sampled. CleanAir weighed the rinse residue with the object, then removed the object and re-weighed the residue. Because CleanAir believed that the object was not representative of the Zurn Boiler operations, CleanAir reported the result for Run 1 as the result that did not include the weight of the foreign object. If the foreign object were included in the analytical procedure for Run 1, the resultant FPM emission factor would have been 0.0050 lb/MMBtu.

As shown in the table and chart below, this result falls well outside the 99% confidence interval of the test run data set dating back to 2012 and is considered an outlier.

**Zurn Boiler Method 5 FPM Results; 2012 - present**

Date	Run	EF (lb/MMBtu)	
5/2/2012	1	0.0009	
5/2/2012	2	0.0006	
5/2/2012	3	0.0006	
5/14/2013	1	0.0009	
5/14/2013	2	0.0005	
5/14/2013	3	0.0005	
5/6/2014	2	0.0007	
5/6/2014	3	0.0011	
7/14/2014	1	0.0010	
7/14/2014	2	0.0012	
7/14/2014	3	0.0008	
	Avg	0.00080	
	St Dev	0.00024	
	Avg +2 St Dev	0.00128	
	Avg +3 St Dev	0.00152	
5/6/2014	1a	0.005	with foreign object
5/6/2014	1	0.0008	w/o foreign object



CleanAir reasonably determined that the foreign object was not representative of FPM from the Zurn Boiler operation. There is no known mechanism by which a gas-fired boiler would generate a large flake of iron as part of its normal operation. Furthermore, the flake is much greater in size than the 100 micron upper limit for suspended particulate. The more likely explanation is that the object is the result of a port scraping from the test run. CleanAir followed the U.S. EPA Method 5 procedures for performing the test and evaluating the filters, but the object was not detectable until the probe wash dried in the laboratory. The FPM emission factor result after removing the object – 0.0008 lb/MMBtu – is consistent with the results from the other FPM test runs performed on the boiler.

The non-representative nature of the May 6, 2014 first test run is further shown in the retest of the Zurn Boiler completed on July 14, 2014. The July test results show an average FPM emission rate of 0.0010 lb/MMBtu, with all runs falling within two standard deviations of the average as shown in the chart above.

Michigan Air Rule 1003 provides that MDEQ may approve using the arithmetic mean of two of the three samples to demonstrate compliance with an emission limit if a sample is accidentally lost or if conditions occur in which one of the three samples must be discontinued beyond the owner or operator's

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control. In this instance, one of the sample results contained a foreign object that is believed to be a port scraping and not representative of FPM from boiler operations. Thus, pursuant to Rule 1003, MPC is requesting the following:

1. MDEQ allow MPC to use the arithmetic mean of Runs 2 and 3 from the May 6, 2014 FPM testing to determine compliance.
2. MDEQ consider the retest that was completed July 14, 2014 and shows an average PM emission rate of 0.0010 lb/MMBtu, which is within the permitted limit of 0.0019 lb/MMBtu, as evidence of compliance and as evidence that the arithmetic mean of Runs 2 and 3 from the May 6, 2014 test is representative of the FPM emission factor for the Zurn Boiler.

MPC looks forward to meeting with you next week to discuss this matter further.

If you have any questions regarding this letter and the enclosure, please feel free to contact Ian Ladomer at (313) 297-6336. We look forward to your response to this letter.

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



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C.T. Case, Deputy Assistant Secretary

Enclosure