



Marathon Petroleum Company LP

VIA FEDERAL EXPRESS

April 5th, 2023

Ms. Regina Angellotti
Michigan Department of Environmental Quality
Air Quality Division
3058 W. Grand Boulevard
Suite 2300
Detroit, MI 48202

1001 S. Oakwood
Detroit, MI 48217-1319
Main No.: 313.843.9100
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**RE: Response to 3/15/2023 Violation Notice Regarding Coker Flare RATA Testing;
Marathon Petroleum Company LP, Michigan Refining Division**

Dear Ms. Angellotti:

This letter is in response to the March 15, 2023 Violation Notice (VN) issued to Marathon Petroleum Company LP, Michigan Refining Division (MPC). In the VN, Michigan Department of Environmental Quality, Air Quality Division (AQD), alleged that the following violations occurred December 21, 2022.

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 VN relates to the invalid results from the RATA on the Coker Flare conducted December 21, 2022. MPC successfully performed a retest on January 31, 2023 that produced valid passing results.

The remainder of this letter provides information requested in the VN, including: (1) the date(s) the alleged violation occurred; (2) an explanation of the causes and duration of the alleged violation; (3) whether the violation is ongoing; (4) a summary of the actions that have been taken and are proposed to be taken to correct the alleged violation and the dates by which these actions will take place; and (5) what steps are being taken to prevent a reoccurrence.

Date the Violation Occurred:

The alleged violation occurred on December 21, 2022 and is not on-going.

Explanation of the Causes and Duration of the Violation:

MRD has identified the contributing factor that led to the invalid RATA result:

1. MPC was completing 2 validations daily on the Coker Flare H2S analyzer in order to limit risk of downtime from potential daily drift failure as a refinery turn around in Q3 led to higher than normal

downtime hours. MPC tracks downtime on a semi-annual bases as an internal performance metric. As a result, to stay below our semi-annual target, the validation frequency was increased to 2x per day for the third and fourth quarters of 2022. A total of nine runs were completed, but during the first two runs an automatic daily validation occurred. This resulted in those two runs becoming invalid. 40 CFR Part 60 Appendix B, Performance Specification 7, requires a minimum of nine sets of reference method tests. Although MPC conducted nine runs, only seven of the runs were deemed valid. The results from the seven runs demonstrated the analyzers were operating with the required accuracy. This was further proved when a valid RATA was completed and passed on January 31, 2023.

Summary of the Actions Taken:

MPC repeated the RATA on January 31, 2023 and had passing results.

Steps Taken to Prevent a Reoccurrence:

As a results of this incident, MPC has implanted additional guidance in our internal stack testing and RATA procedure. Prior to each RATA, MPC personnel will verify automatic daily validations will not be taking place during testing. Additionally, MPC will send our stack testing contractor the CEMS data after the completion of test to verify the RATA passed prior to demobilization.

If you have questions concerning this submittal, please feel free to contact Emily Mattson at 313-297-6289.

Sincerely,

Marathon Petroleum Company LP

By: MPC Investment LLC, General Partner



John S. Stefko, Deputy Assistant Secretary

Attachments

Cc: Hosam Hossanien, City of Detroit BSEED
Crystal Rogers, City of Detroit BSEED
Annette Switzer, EGLE
Christopher Etheridge, EGLE,
Brad Myott, EGLE
Jenine Camilleri, EGLE
Dr. April Wendling, EGLE
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