

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

A983130860

FACILITY: MARATHON PETROLEUM COMPANY LP		SRN / ID: A9831
LOCATION: 1300 S FORT ST, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Ian Ladomer, Environmental Supervisor		ACTIVITY DATE: 06/08/2015
STAFF: Jorge Acevedo	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MEGASITE
SUBJECT: BWON Inspection.		
RESOLVED COMPLAINTS:		

COMPANY NAME : Marathon Petroleum Company-
FACILITY ADDRESS : 1300 S. Fort Street, Detroit, MI 48217
STATE REGISTRAT. NUMBER : A9831
SIC CODE : 2911
EPA SOURCE CLASS : A
EPA POLLUTANT CLASS : Mega Site
LEVEL OF INSPECTION : PCE
DATE OF INSPECTION : 06/8/15
TIME OF INSPECTION : 9:30 AM
DATE OF REPORT : 9/1/15
REASON FOR INSPECTION : Partial Compliance Inspection.
INSPECTED BY : Jorge Acevedo, Todd Zynda
PERSONNEL PRESENT : Anita Wills
FACILITY PHONE NUMBER :
FACILITY FAX NUMBER :

INSPECTION NARRATIVE:

On June 8, 2015, I conducted a partial compliance evaluation of the Marathon Petroleum Refinery. I arrived at 9:30 AM and met with Anita Wills. I was accompanied by Todd Zynda, AQD. The focus of the inspection was verifying several aspects of the Benzene Waste Neshap(BWON). The focus of the inspection was the wastewater area of the Refinery. A majority of the benzene generated at the Refinery is generated in the Wastewater plant. I brought an Infrared Camera (IR Camera) onsite to have field time with the device.

We went into the conference room to talk about the inspection. We asked for an overview of how the Refinery complies with the BWON. Several topics of conversation included:

- **Sampling-** Refinery is on a five year sampling schedule to ensure that benzene concentrations are accurate. The frequency of sampling is dictated by best practice. The Refinery conducted sampling this year and is done for the year. Sampling will be conducted next year. End of Line Sampling will be done more frequently.
- **Point of Generation-** Point of Generation has remained consistent. It has been updated since the Delayed Coker has been installed.
- **QQQ-** 40 CFR 60 Subpart QQQ pertains to Oily water sewers.
- **Level Gauges-** Level gauges are measured and sampled and go towards the Total Annual Benzene number as prescribed by the BWON
- **Carbon Canisters-** Canisters are inspected according to use. Frequency can change depending on use. Staff use leak detection and repair equipment (TVA) to monitor for spent carbon canister..
- **Vacuum Trucks-** Each delivery and movement of truck is an event recorded in determining TAB. Mostly, it is slop oil which is recycled back into the slop system
- **Gas Terminal-** The Light Products Terminal is covered under the Refinery BWON plan.
- **Air Products-** Covered by BWON plan because it is collocated with Refinery. However, Air Products only has drains subject to 40 CFR 60 Subpart QQQ.

Ms. Wills had records for visual observations which are required by BWON and provided them along with Piping &

Instrumentation Diagrams via postal mail.

We began the inspection by turning on the IR camera and checking in with Operations and getting the appropriate clearance.

We inspected the following process units with the IR Camera:

- Crude Flare.
- Benzene Stripper(Benzene Flash Column)
- Desalter 31 and Desalter 32
- Desalter Effluent Pretreatment - Settles out solids
- Slop Oil Container
- Storage Tank – Equalization Tank
- Carbon Canisters

The IR camera footage was placed in the facility file.

FACILITY BACKGROUND

The Detroit Marathon Petroleum Company Refinery (MPC), situated in the southwest of Detroit, processes approximately 115,000 barrels per day (B/D) of crude oil which is refined into a product mix of approximately 50% gasoline, 25% fuel oil, 18% Asphalt, and 7% other products. The makeup of this production will vary depending on the type of crude used as charge stock. The finished products leave the facility via truck, lake tanker, railroad car, or pipeline. The refinery operates 24 hours per day, 7 days per weeks, and 52 weeks per year. The refinery has been operating at this site for more than 50 years. MPC Detroit refinery is both a PSD and ROP major facility.

COMPLAINT/COMPLIANCE HISTORY

The MPC refinery has been issued one violation notice(VN) over the past twelve months. The MPC refinery has been a source of odor complaints during past years. All complaints have come from neighboring homes in southwest Detroit and the city of Melvindale located to the west.

OUTSTANDING CONSENT ORDERS

Currently, MPC has two outstanding New Source Review Consent Decrees. One is with the United States of America (Civil No. 01-40119) lodged May 11, 2001 and entered August 28, 2001. The County of Wayne, Michigan and the States of Minnesota and Louisiana are Plaintiff-Intervenors.

The other is with the Department of Justice and U.S. EPA (Civil No. 12-11544) lodged on April 5, 2012 and entered August 30, 2012.

OUTSTANDING LOVs

May 29, 2015 VN has not been resolved.

OPERATING SCHEDULE/PRODUCTION RATE

The MPC Detroit Refinery operates 24 hours per day, 7 days per week and 52 weeks per year, or 8760 hours per year. The crude unit raw crude oil capacity is nameplated at 115000 barrels per day; the actual crude oil throughput varies depending upon type.

PROCESS DESCRIPTION

Marathon's Wastewater Treatment Unit handles all wastewater generated by the desalting of crude oil.

APPLICABLE RULES/PERMIT CONDITIONS:

During this inspection, an IR camera was used to film process equipment subject to the BWON. The IR camera is used to identify leaks of hydrocarbons. During the inspection, no leaks were detected with the IR camera. In addition BWON visual inspections were reviewed for the 1st Quarter 2015. The facility maintains inspection records. No leaks were identified during the facility's quarterly inspection.

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

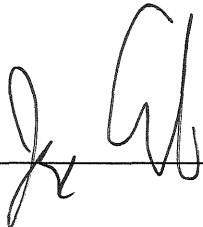
N/A

MAERS REPORT REVIEW:

Pollutant	2014 Emissions(TPY)
CO	148
NOx	430
PM	90
Sox	211
VOC	435

FINAL COMPLIANCE DETERMINATION:

Based on observations with the IR camera and records received during the inspection, the facility appears to be in compliance with portions of the BWON regulation.

NAME 

DATE 9-1-11

SUPERVISOR W.M.