



Michigan Refining Division

Marathon Petroleum Company LP

VIA FEDERAL EXPRESS

1300 South Fort Street
Detroit, MI 48217
Tel: 313.843.9100

July 9, 2014

Ms. Wilhemina McLemore, District Supervisor
Michigan Department of Environmental Quality
Air Quality Division
3058 W. Grand Boulevard
Suite 2300
Detroit, MI 48202

RE: Addendum to the July 2, 2014 Stack Test Report for the Zurn Boiler at Marathon Petroleum Company LP's Detroit Refinery

Dear Ms. McLemore:

On May 6, 2014, Marathon Petroleum Company LP (MPC) – Detroit Refinery conducted an emission compliance test for particulate matter, assumed equivalent to filterable particulate matter (FPM), from the Zurn Boiler (EU27-ZURNBOILER). This boiler is a natural gas-fired unit subject to emission limits and testing requirements in Permit to Install 63-08D, dated May 12, 2014. 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 Michigan Department of Environmental Quality – Air Quality Division (MDEQ-AQD) on July 3, 2014. MPC is requesting that the first test run for FPM be omitted and the compliance determination for PM from EU27-ZURNBOILER be based on the second and third runs only. Justification for this request is provided below.

As noted in the 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. The reported results for Run 1 in the test report, therefore, do not include the weight of the foreign object. However, if the foreign object were included in the analytical procedure for Run 1, the resultant FPM emission factor would be 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. In addition, combustion engineering principles would dictate that it would be highly unlikely that natural gas combustion would result in large metallic particles in the stack gas.

MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT
REPORT CERTIFICATION**



Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Natural Resources and Environment, Air Quality Division upon request.

Source Name Marathon Petroleum Company LP County Wayne

Source Address 1300 South Fort Street City Detroit

AQD Source ID (SRN) A9831 ROP No. MI-ROP-A9831-2012b ROP Section No. 01

Please check the appropriate box(es):

Annual Compliance Certification (Pursuant to Rule 213(4)(c))

Reporting period (provide inclusive dates): From _____ To _____

1. During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.

2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, EXCEPT for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))

Reporting period (provide inclusive dates): From _____ To _____

1. During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.

2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, EXCEPT for the deviations identified on the enclosed deviation report(s).

Other Report Certification

Reporting period (provide inclusive dates): From 7/9/2014 To 7/9/2014

Additional monitoring reports or other applicable documents required by the ROP are attached as described:
Addendum to the Zurn Boiler Emissions Compliance Final Reports.

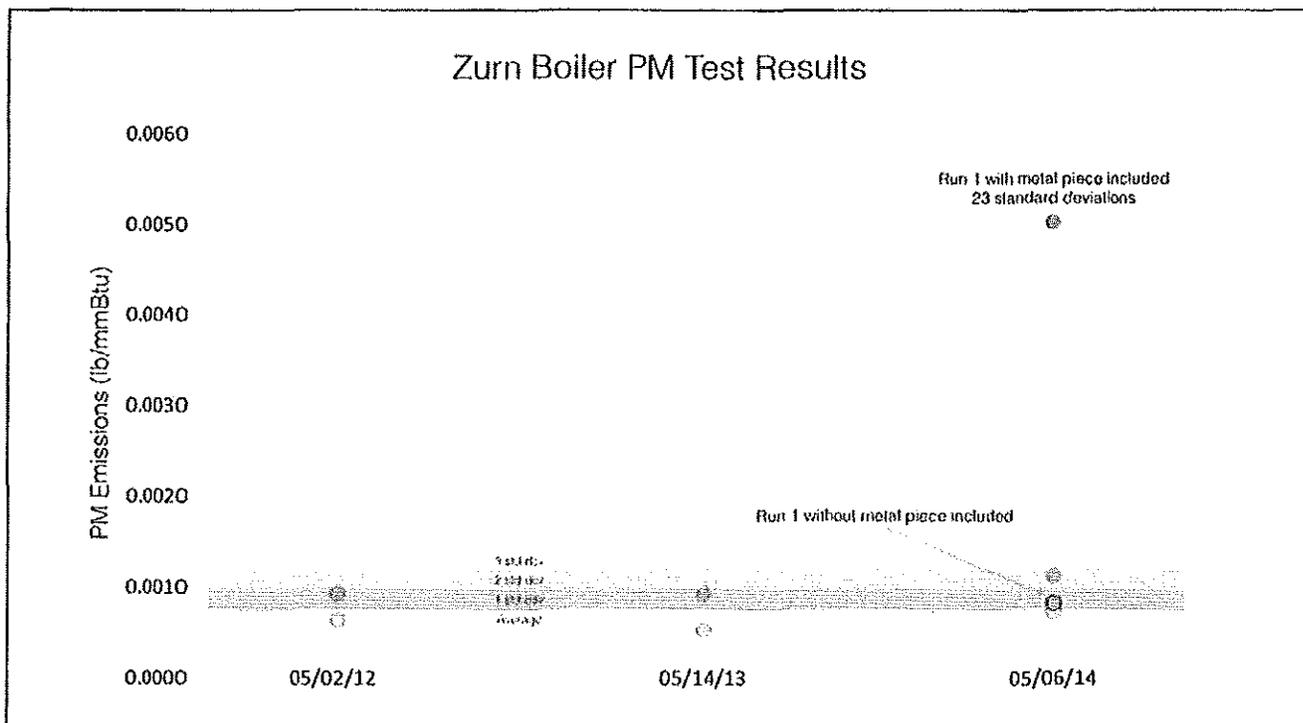
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

Mr. C.T. Case MPC Investment LLC, Its General Partner Deputy Assistant Secretary 313-843-9100
Name of Responsible Official (print or type) Title Phone Number
C.T. Case Signature of Responsible Official 7/9/14 Date

* Photocopy this form as needed.

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	
	Avg	0.00073	
	St Dev	0.00022	
	Avg + 2 St Dev	0.00116	95%
	Avg + 3 St Dev	0.00138	99%
5/6/2014	1a	0.0050	with foreign object
5/6/2014	1	0.0008	w/o foreign object



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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 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 that MDEQ allow MPC to use the arithmetic mean of Runs 2 and 3 from the May 6, 2014 FPM testing to determine compliance. To that end, MPC will complete the following:

1. Submit a revised compliance stack test report for FPM testing on May 6, 2014 omitting Run 1 and showing the average based on Runs 2 and 3 only.
2. Re-test the Zurn Boiler for FPM as soon as possible (currently scheduled for July 14, 2014).

We will follow this communication with a phone call to Jorge Acevedo of your office. In the meantime, if you have any question concerning this communication, feel free to contact Ian Ladomer of my staff at (313) 297-6336.

Sincerely,

Marathon Petroleum Company LP

By: MPC Investment LLC, General Partner



C.T. Case, Deputy Assistant Secretary

Attachment

Cc: Jorge Acevedo – Federal Express Overnight
Michigan Department of Environmental Quality – Air Quality Division
Southeast Michigan District Office
Cadillac Place
3058 W. Grand Blvd., Suite 2-300
Detroit, MI 48202