

## 1. PROJECT OVERVIEW

### Test Program Summary

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Marathon Petroleum Company LP contracted CleanAir Engineering (CleanAir) to complete testing on the Coker Heater (EU70-COKERHTR-S1) at the Detroit Refinery. The test program included particulate matter (PM) testing intended to demonstrate compliance with the MDEQ Permit No. MI-ROP-A9831-2012c.

For the testing described in this report, CleanAir mistakenly provided the crew with filters prepared for Method 5B instead of Method 5. The methods differ in how the filters are prepared prior to testing and how the filters are analyzed after testing. As further discussed in a memorandum from CleanAir to MPC dated September 24, 2020 presented in Appendix I of this report, this difference imparted a significant positive bias to the measured particulate emissions. Due to this error and the resulting bias, these tests results are not representative of true unit emissions and should be discarded. Consequently, particulate emissions are presented in this report but not evaluated against the applicable limits.

Section 2 Results provides a more detailed account of the test conditions and data analysis. Test program information, including the test parameters, on-site schedule and a project discussion, begin below.

### Test Program Details

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#### Parameters

The test program included the following emissions measurements:

- particulate matter (PM) as filterable particulate matter (FPM)
- total particulate matter less than 10 microns in diameter ( $PM_{10}$ ), assumed equivalent to the sum of the following constituents:
  - FPM
  - condensable particulate matter (CPM)
- flue gas composition (e.g.,  $O_2$ ,  $CO_2$ ,  $H_2O$ )
- flue gas temperature
- flue gas flow rate

## Schedule

Testing was performed on August 11 and 12, 2020. The on-site schedule followed during the test program is outlined in Table 1-1.

**Table 1-1:  
Test Schedule**

Run Number	Location	Method	Analyte	Date	Start Time	End Time
1	Coker Heater	USEPA Method 5 / 202	FPM / CPM	08/11/20	13:10	14:16
2	Coker Heater	USEPA Method 5 / 202	FPM / CPM	08/11/20	14:53	15:59
3	Coker Heater	USEPA Method 5 / 202	FPM / CPM	08/11/20	16:25	17:30
4	Coker Heater	USEPA Method 5 / 202	FPM / CPM	08/12/20	07:43	08:49

## Discussion

### PM & PM<sub>10</sub> Testing

A total of four (4) 60-minute EPA Method 5/202 test runs were performed. PM and PM<sub>10</sub> emission results were calculated in units of pounds per million Btu (lb/MMBtu). The final result was expressed as the average of the three (3) highest runs.

PM<sub>10</sub> is assumed equivalent to the sum of FPM and CPM. The Method 5/202 sample train yields a front-half, FPM result and a back-half, CPM result. The total PM result (FPM plus CPM) from Method 5/202 can be used as a worst-case estimation of total PM<sub>10</sub> since Method 5 collects all FPM present in the flue gas (regardless of particle size). The final result was expressed as the average of the three (3) highest runs.

### Calculations

Emission results in units of dry volume-based concentration (lb/dscf, ppm<sub>dv</sub>) were converted into units of pound per million BTU (lb/MMBtu) using an oxygen-based fuel factor ( $F_d$ ) for refinery gas provided by MPC.

### Test Conditions

The unit was operated at the maximum normal operating capacity during each of the emissions compliance test runs. MPC was responsible for logging any relevant process-related data and providing it to CleanAir for inclusion in the test reports.

## AIR QUALITY DIVISION

## 2. RESULTS

This section summarizes the test program results. Additional results are available in the report appendices, specifically Appendix C Parameters.

**Table 2-1:  
Coker Heater – FPM & PM<sub>10</sub> Emissions**

Run No.		1	2	3*	4	Average
Date (2020)		Aug 11	Aug 11	Aug 11	Aug 12	
Start Time (approx.)		13:10	14:53	16:25	07:43	
Stop Time (approx.)		14:16	15:59	17:30	08:49	
<b>Process Conditions</b>						
R <sub>p</sub>	Production Rate (BPD)	38,500	38,500	38,500	38,500	38,500
P <sub>1</sub>	Fuel Consumption (mscf/day)	4,191	4,219	4,179	4,180	4,192
F <sub>d</sub>	Oxygen-based F-factor (dscf/MMBtu)	8,605	8,605	8,605	8,608	8,606
H <sub>i</sub>	Actual heat input (MMBtu/hr)	208	209	207	209	208
<b>Gas Conditions</b>						
O <sub>2</sub>	Oxygen (dry volume %)	6.6	6.7	6.7	6.6	6.6
CO <sub>2</sub>	Carbon dioxide (dry volume %)	8.2	8.0	8.1	8.3	8.2
T <sub>s</sub>	Stack temperature (°F)	401	402	404	392	398
B <sub>w</sub>	Actual water vapor in gas (% by volume)	14.4	14.6	14.0	14.0	14.3
<b>Gas Flow Rate</b>						
Q <sub>a</sub>	Volumetric flow rate, actual (acfm)	98,700	97,300	96,900	98,900	98,300
Q <sub>s</sub>	Volumetric flow rate, standard (scfm)	58,700	57,800	57,400	60,000	58,900
Q <sub>std</sub>	Volumetric flow rate, dry standard (dscfm)	50,300	49,400	49,400	51,600	50,400
<b>Sampling Data</b>						
V <sub>mstd</sub>	Volume metered, standard (dscf)	31.61	32.10	32.52	34.30	32.67
%I	Isokinetic sampling (%)	96.1	99.4	100.7	101.6	99.1
<b>Laboratory Data<sup>1</sup></b>						
m <sub>n</sub>	Total FPM (g)	0.00337	0.00329	0.00339	0.00373	
m <sub>CPM</sub>	Total CPM (g)	0.00288	0.00267	0.00061	0.00192	
m <sub>Part</sub>	Total particulate matter (g)	0.00625	0.00596	0.00400	0.00565	
<b>FPM Results<sup>2</sup></b>						
C <sub>sd</sub>	Particulate Concentration (lb/dscf)	2.35E-07	2.26E-07	2.30E-07	2.40E-07	2.35E-07
E <sub>lb/hr</sub>	Particulate Rate (lb/hr)	0.710	0.669	0.681	0.742	0.711
E <sub>Fd</sub>	Particulate Rate - F <sub>d</sub> -based (lb/MMBtu)	0.00296	0.00286	0.00291	0.00302	0.00296
<b>CPM Results</b>						
C <sub>sd</sub>	Particulate Concentration (lb/dscf)	2.01E-07	1.84E-07	4.14E-08	1.23E-07	1.37E-07
E <sub>lb/hr</sub>	Particulate Rate (lb/hr)	0.606	0.544	0.123	0.381	0.413
E <sub>Fd</sub>	Particulate Rate - F <sub>d</sub> -based (lb/MMBtu)	0.00252	0.00233	0.00052	0.00155	0.00173
<b>PM<sub>10</sub> Results<sup>3</sup></b>						
C <sub>sd</sub>	Particulate Concentration (lb/dscf)	4.36E-07	4.10E-07	2.71E-07	3.63E-07	4.03E-07
E <sub>lb/hr</sub>	Particulate Rate (lb/hr)	1.32	1.21	0.804	1.12	1.217
E <sub>Fd</sub>	Particulate Rate - F <sub>d</sub> -based (lb/MMBtu)	0.00548	0.00519	0.00343	0.00457	0.00508

The particulate results in this table are not believed to be representative of true emissions.

<sup>1</sup> Front half filter tare weights were determined subsequent to baking at 160°C, final weights were determined subsequent to baking at 105°C.

<sup>2</sup> FPM final average is the average of the three (3) highest FPM runs.

<sup>3</sup> PM<sub>10</sub> final average is the average of the three (3) highest PM<sub>10</sub> runs.

### 3. DESCRIPTION OF INSTALLATION

#### Process Description

MPC’s facility in Detroit, Michigan, produces refined petroleum products from crude oil. MPC must continue to demonstrate that select process units are in compliance with permitted emission limits.

The Coker unit (EU70-COKER) converts Vacuum Resid (Crude Vacuum Tower Bottoms), a product normally sold as asphalt or blended into residual fuel oil, into lighter, more valuable products. The Vacuum Resid feedstock is heated before it enters the main fractionator, where lighter material vaporizes. The fractionator bottoms are routed through a fired heater and then into a coke drum. This emission unit consists of process vessels (fractionators), coke drums, heater (EU70-COKERHTR-S1), cooling tower, compressors, pumps, piping, drains and various components (pumps and compressor seals, process valves, pressure relief valves, flanges, connectors, etc.). This emission group includes the Coke Handling System, which collects, sizes and transports the petroleum coke created during the coking process. The system consists of a coke pit, storage pad, enclosed crusher, enclosed conveyors and surge bins.

The Coker Heater is fired by refinery fuel gas. Emissions are vented to the atmosphere via the Coker Heater Stack (SV70-H1) where testing was performed.

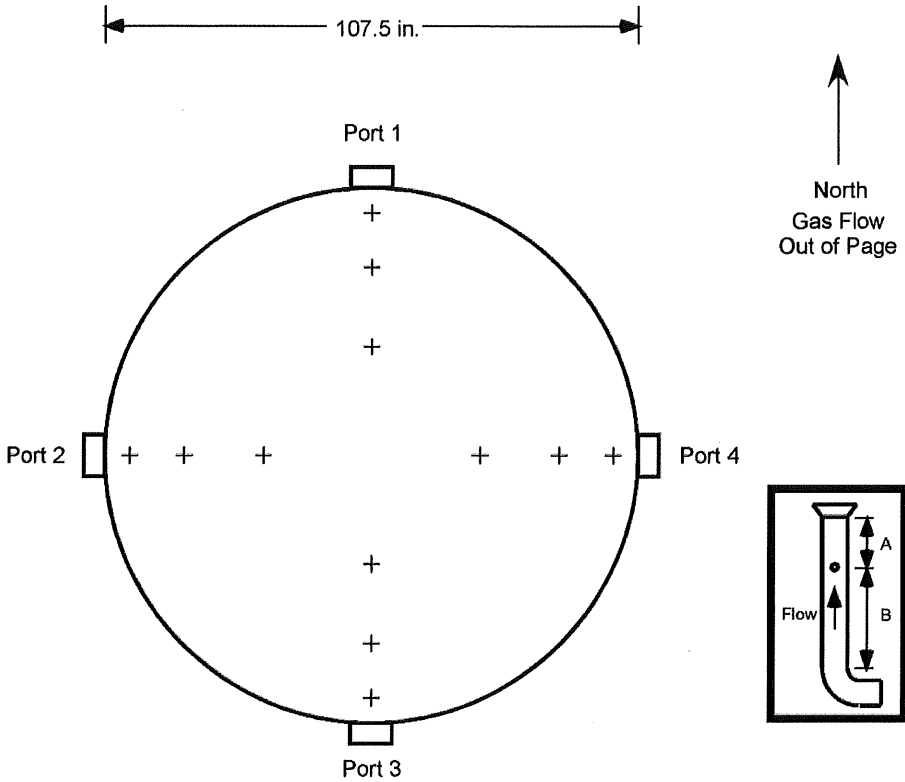
#### Test Location

The sample point locations were determined by EPA Method 1. Table 3-1 presents the sampling information for the test location described in this report. The figure shown on page 5 represents the layout of the test location.

**Table 3-1:  
 Sampling Point Information**

<u>Source</u> Constituent	Method (USEPA)	Run No.	Ports	Points per Port	Minutes per Point	Total Minutes	Figure
<u>Coker Heater Stack</u>							
FPM/CPM	5 / 202	1-4	4	3	5	60	3-1

**Figure 3-1:  
 FPM & PM<sub>10</sub> Sample Point Layout**



Sampling Point	% of Stack Diameter	Port to Point Distance (inches)
1	29.6	31.8
2	14.6	15.5
3	4.4	4.7

Duct diameters upstream from flow disturbance (A): 5.2      Limit: 0.5  
 Duct diameters downstream from flow disturbance (B): 8.3      Limit: 2.0

## 4. *METHODOLOGY*

### Procedures and Regulations

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The test program sampling measurements followed procedures and regulations outlined by the USEPA and Michigan Department of Environment, Great Lakes, and Energy (EGLE). These methods appear in detail in Title 40 of the CFR and at <https://www.epa.gov/emc>.

CleanAir follows specific QA/QC procedures outlined in the individual methods and in USEPA "Quality Assurance Handbook for Air Pollution Measurement Systems: Volume III Stationary Source-Specific Methods," EPA/600/R-94/038C. Appendix D contains additional QA/QC measures, as outlined in CleanAir's internal Quality Manual.

#### Title 40 CFR Part 60, Appendix A

- Method 1 "Sample and Velocity Traverses for Stationary Sources"
- Method 2 "Determination of Stack Gas Velocity and Volumetric Flow Rate (Type S Pitot Tube)"
- Method 3 "Gas Analysis for the Determination of Dry Molecular Weight"
- Method 3A "Determination of Oxygen and Carbon Dioxide Concentrations in Emissions from Stationary Sources (Instrumental Analyzer Procedure)"
- Method 3B "Gas Analysis for the Determination of Emission Rate Correction Factor or Excess Air"
- Method 4 "Determination of Moisture Content in Stack Gases"
- Method 5 "Determination of Particulate Matter Emissions from Stationary Sources"

#### Title 40 CFR Part 51, Appendix M

- Method 202 "Dry Impinger Method for Determining Condensable Particulate Emissions from Stationary Sources"

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## Methodology Discussion

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### *PM & PM<sub>10</sub> Testing – USEPA Method 5/202*

PM and PM<sub>10</sub> emissions were determined using EPA Method 5/202. Filters for this test were mistakenly prepared for Method 5B rather than for Method 5 resulting in a high bias for particulate matter emissions. See Appendix I for more details.

The front-half of the sampling train consisted of a glass nozzle, glass liner and filter holder heated to 248°F ± 25°F and a quartz fiber filter. Flue gas samples were extracted isokinetically per Method 5 requirements.

The back-half (Method 202 portion) of the sampling train is designed to mimic ambient conditions and collect only the particles that would truly form CPM in the atmosphere by minimizing the sulfur dioxide (SO<sub>2</sub>) and nitrogen oxide (NO<sub>x</sub>) interferences observed with earlier versions of the method, in which flue gas was bubbled through cold water, and SO<sub>2</sub> and NO<sub>x</sub> were absorbed and partially oxidized before they could be purged out with nitrogen (N<sub>2</sub>).

Flue gas exiting the front-half heated filter passes through a coiled condenser and dry impinger system jacketed by water continually circulated at ambient temperature. Moisture is removed from the flue gas without bubbling through the condensed water. Flue gas then passes through a tetrafluoromethane (TFE) membrane filter at ambient temperature. The temperature of the flue gas at the exit of the filter was directly measured with an in-line thermocouple and maintained in the temperature range of 65°F to 85°F.

After exiting the ambient filter, the flue gas passes through two (2) additional impingers surrounded by ice in a “cold” section of the impinger bucket. The moisture collected in these impingers will not be analyzed for CPM and is only collected to determine the flue gas moisture and to thoroughly dry the gas. The sample gas then flows into a calibrated dry gas meter where the collected sample gas volume is determined.

The front-half portion of the sample train (nozzle, probe and heated filter) was recovered per Method 5 requirements, using acetone as the recovery solvent. The back-half of the sample train (heated filter outlet, condenser, dry impingers and TFE membrane filter) was recovered per Method 202 requirements. The impinger train was purged with N<sub>2</sub> at a rate of 14 liters per minute (lpm) for one (1) hour following each test run and prior to recovery.

A field train blank was assembled, purged and recovered as if it were an actual test sample; analysis of the field train blank was used to blank-correct the test run results. Reagent blanks were collected to quantify background contamination. All samples and blanks were returned to CleanAir Analytical Services in Palatine, Illinois, for gravimetric analysis. Method 202 samples were maintained at a temperature < 85°F during transport to the laboratory.

All samples and blanks were returned to CleanAir Analytical Services in Palatine, Illinois, for gravimetric analysis. Upon receipt, the filters dessicated for 24 hours at ambient temperature followed by an oven dry at 220°F. The front-half rinses were evaporated at ambient temperature and pressure. The masses from each fraction were then summed for a total FPM mass.

## 5. *APPENDIX*

Appendix A: Test Method Specifications

Appendix B: Sample Calculations

Appendix C: Parameters

Appendix D: QA/QC Data

Appendix E: Field Data

Appendix F: Field Data Printouts

Appendix G: Facility Process & Fuel Analysis Data

Appendix H: Laboratory data

Appendix I: Filter Memo

Appendix J: CleanAir Resumes and Certifications



## APPENDIX A: TEST METHOD SPECIFICATIONS

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## Specification Sheet for

## EPA Method 5/202

Source Location Name(s) Coker Heater Stack  
 Pollutant(s) to be Determined Filterable Particulate Matter (FPM) and Condensable Particulate Matter (CPM)  
 Other Parameters to be Determined from Train Gas Density, Moisture, Flow Rate

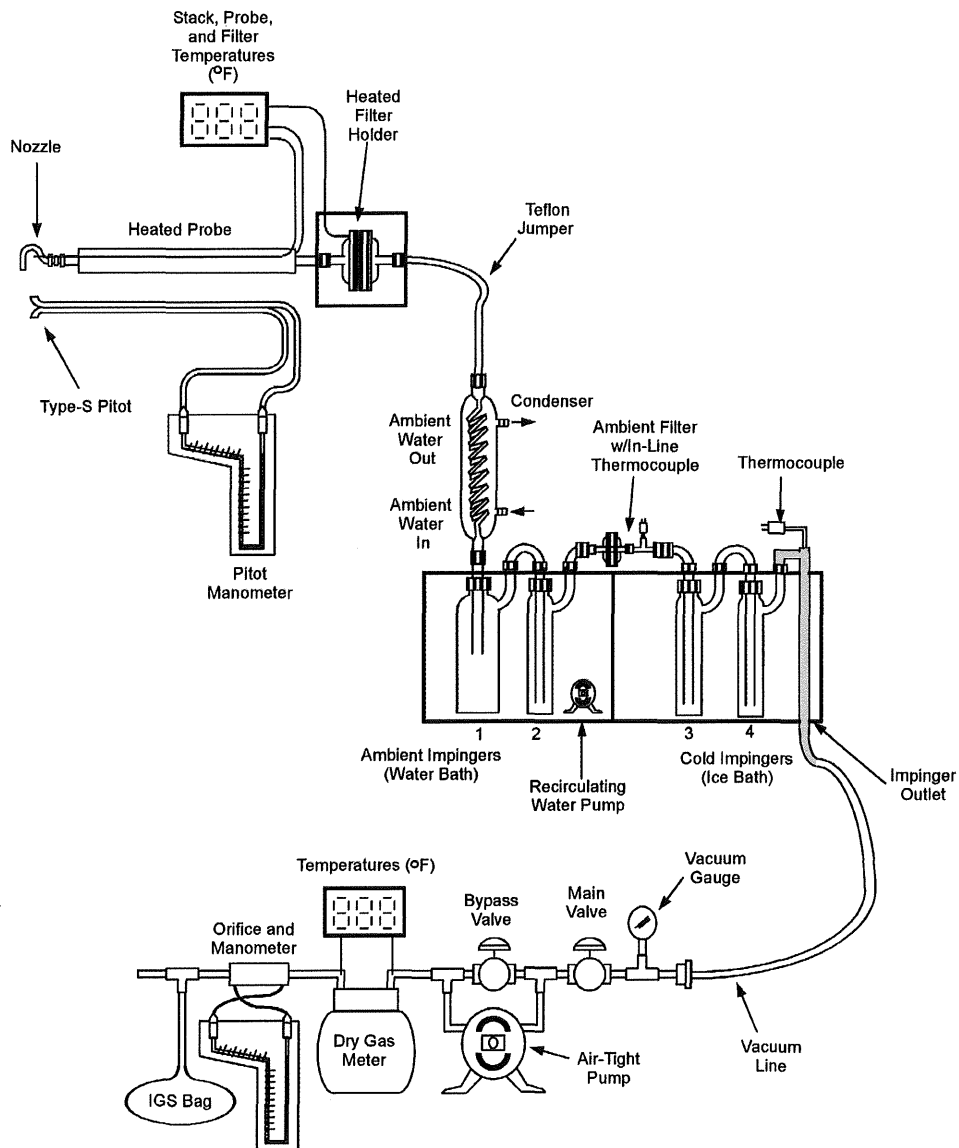
	<u>Standard Method Specification</u>	<u>Actual Specification Used</u>
<b>Pollutant Sampling Information</b>		
Duration of Run	N/A	60 minutes
No. of Sample Traverse Points	N/A	12
Sample Time per Point	N/A	5 minutes
Sampling Rate	Isokinetic (90-110%)	Isokinetic (90-110%)
<b>Sampling Probe</b>		
Nozzle Material	Stainless Steel or Glass	Borosilicate Glass
Nozzle Design	Button-Hook or Elbow	Button-Hook
Probe Liner Material	Glass or Teflon	Borosilicate Glass
Effective Probe Length	N/A	6 feet
Probe Temperature Set-Point	248°F±25°F	248°F±25°F
<b>Velocity Measuring Equipment</b>		
Pitot Tube Design	Type S	Type S
Pitot Tube Coefficient	N/A	0.830
Pitot Tube Calibration by	Geometric or Wind Tunnel	Wind-Tunnel
Pitot Tube Attachment	Attached to Probe	Attached to Probe
<b>Metering System Console</b>		
Meter Type	Dry Gas Meter	Dry Gas Meter
Meter Accuracy	±2%	±1%
Meter Resolution	N/A	0.01 cubic feet
Meter Size	N/A	0.1 dcf/revolution
Meter Calibrated Against	Wet Test Meter or Standard DGM	Wet Test Meter
Pump Type	N/A	Rotary Vane
Temperature Measurements	N/A	Type K Thermocouple/Pyrometer
Temperature Resolution	5.4°F	1.0°F
ΔP Differential Pressure Gauge	Inclined Manometer or Equivalent	Inclined Manometer
ΔH Differential Pressure Gauge	Inclined Manometer or Equivalent	Inclined Manometer
Barometer	Mercury or Aneroid	Digital Barometer calibrated w/Mercury Aneroid
<b>FPM Filter Description</b>		
Filter Location	After Probe	Exit of Probe
Filter Holder Material	Quartz	Borosilicate Glass
Filter Support Material	Glass Frit	Teflon
Cyclone Material	N/A	None
Filter Heater Set-Point	248°F±25°F	248°F±25°F
Filter Material	Glass Fiber	Quartz Fiber
<b>Other Components</b>		
Description	Condenser	Condenser
Location	Before Impinger 1	Before 1st Impinger
Operating Temperature	≤85°F	≤85°F

## Specification Sheet for

## EPA Method 5/202

	<u>Standard Method Specification</u>	<u>Actual Specification Used</u>
<b>Impinger Train Description</b>		
Type of Glassware Connections	Leak-Free Glass Connectors	Ground Glass with Silicone O-Ring
Connection to Probe or Filter by	Direct or Flexible Connection	Flexible Teflon Line
Number of Impingers	4	4
Impinger Stem Types		
Impinger 1	Shortened Stem (open tip)	Shortened Stem (open tip)
Impinger 2	Modified Greenburg-Smith	Modified Greenburg-Smith
Impinger 3	Modified Greenburg-Smith	Modified Greenburg-Smith
Impinger 4	Modified Greenburg-Smith	Modified Greenburg-Smith
Impinger 5		
Impinger 6		
Impinger 7		
Impinger 8		
<b>CPM Filter Description</b>		
Filter Location	Between 2nd and 3rd Impingers	Between 2nd and 3rd Impingers
Filter Holder Material	Glass, Stainless Steel or Teflon	Borosilicate Glass
Filter Support Material	Teflon	Teflon
Cyclone Material	None	None
Filter Heater Set-Point	>65°F but ≤85°F	>65°F but ≤85°F
Filter Material	Teflon Membrane	Teflon Membrane
<b>Gas Density Determination</b>		
Sample Collection	Multi-point integrated	Multi-Point Integrated
Sample Collection Medium	Flexible Gas Bag	Vinyl Bag
Sample Analysis	Orsat or CEM Analyzer	CEM
<b>Sample Recovery Information</b>		
Nozzle Brush Material	Nylon Bristle or Teflon	Nylon Bristle
Nozzle Rinse Reagent	Acetone	Acetone
Nozzle Rinse Wash Bottle Material	Glass or Polyethylene	Inorganic in polyethylene, organic in Teflon
Nozzle Rinse Storage Container	Glass or Polyethylene	Glass
Filter Recovered?	Yes	Yes
Filter Storage Container	FH filter in petri dish, CPM filter in petri dish	FH filter in petri dish, CPM filter in petri dish
Impinger Contents Recovered?	Yes	Yes
Impinger Rinse Reagent	DI Water/Acetone/Hexane	DI Water/Acetone/Hexane
Impinger Wash Bottle	Inorganic in polyethylene, organic in Teflon	Inorganic in polyethylene, organic in Teflon
Impinger Storage Container	Inorganic in polyethylene, organic in glass	Inorganic in amber glass, organic in amber glass
<b>Analytical Information</b>		
Method 4 H <sub>2</sub> O Determination by	Volumetric or Gravimetric	Gravimetric and Volumetric
Filter Preparation Conditions	Dessicate 24 Hours or Filter Extraction	See Analytical Flow Chart
Front-Half Rinse Preparation	Evaporate at ambient temperature and pressure	Evaporate at ambient temperature and pressure
Back-Half Analysis	Sonication and Extraction	See Analytical Flow Chart
Additional Analysis	N/A	None

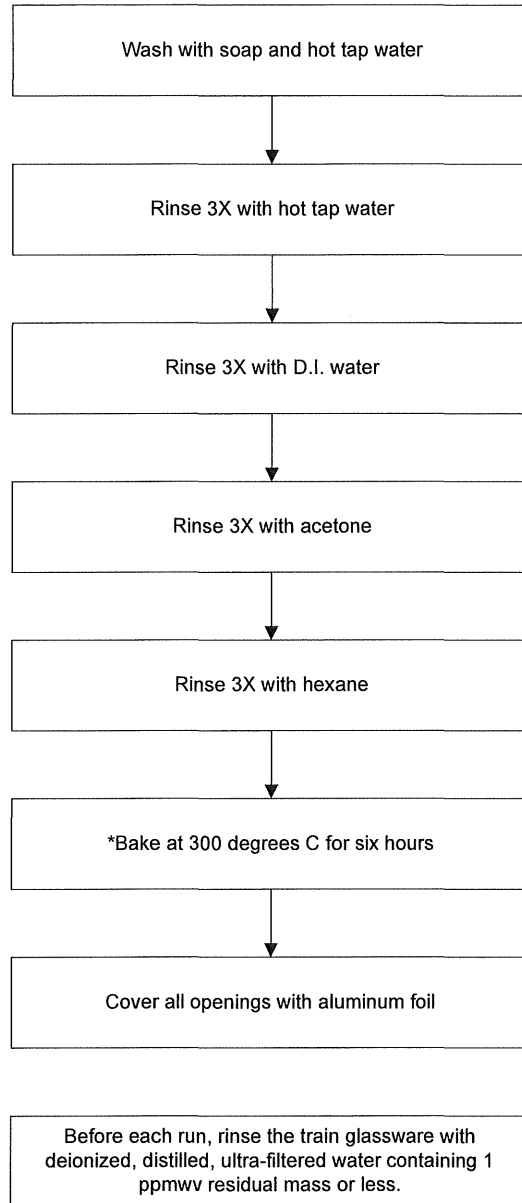
# EPA Method 5/202 Sampling Train Configuration



### Impinger Contents

Impinger 1	Empty
Impinger 2	Empty
Impinger 3	DI H <sub>2</sub> O
Impinger 4	Silica Gel

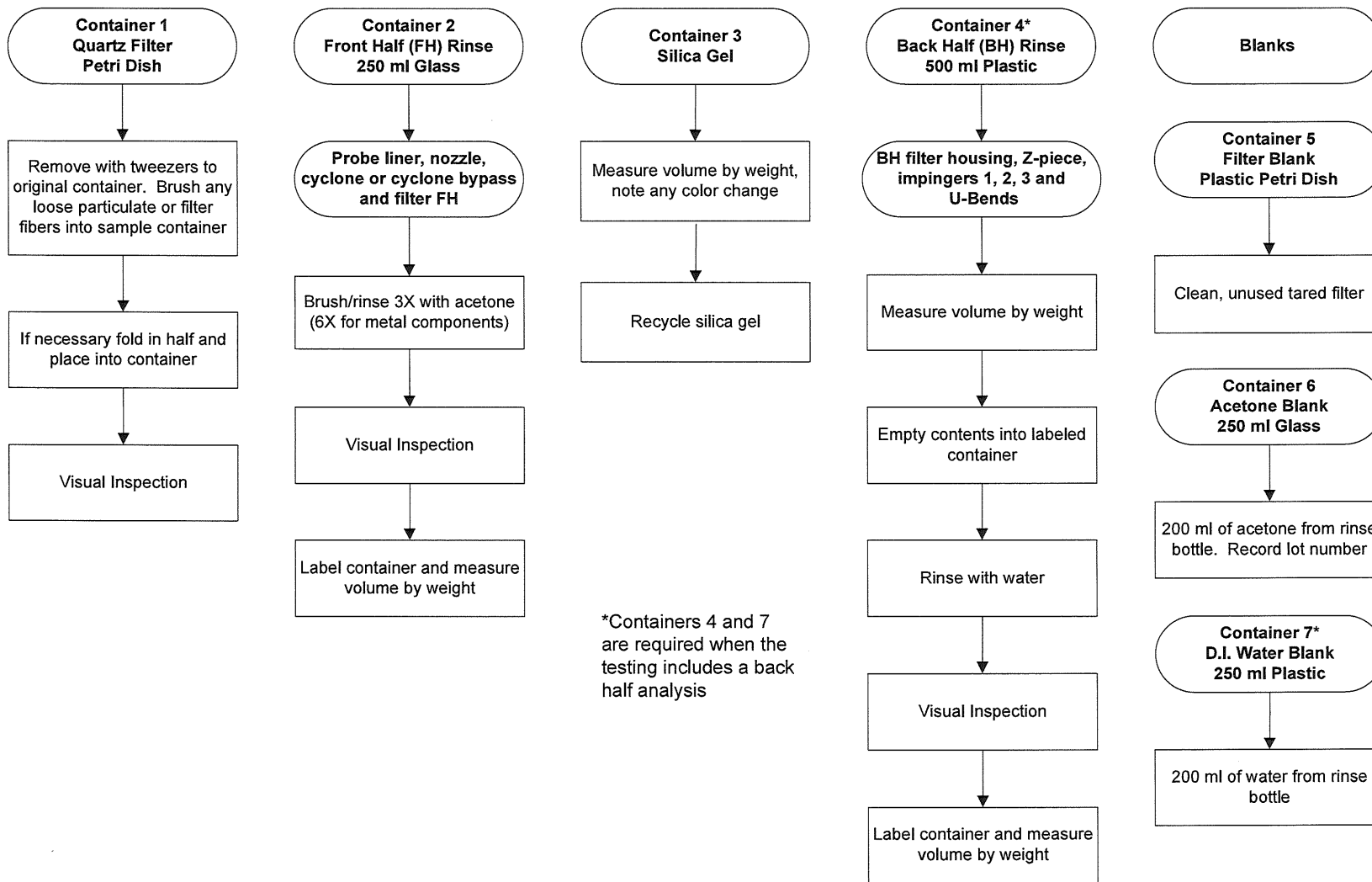
## EPA Method 202 Glassware Preparation Procedures



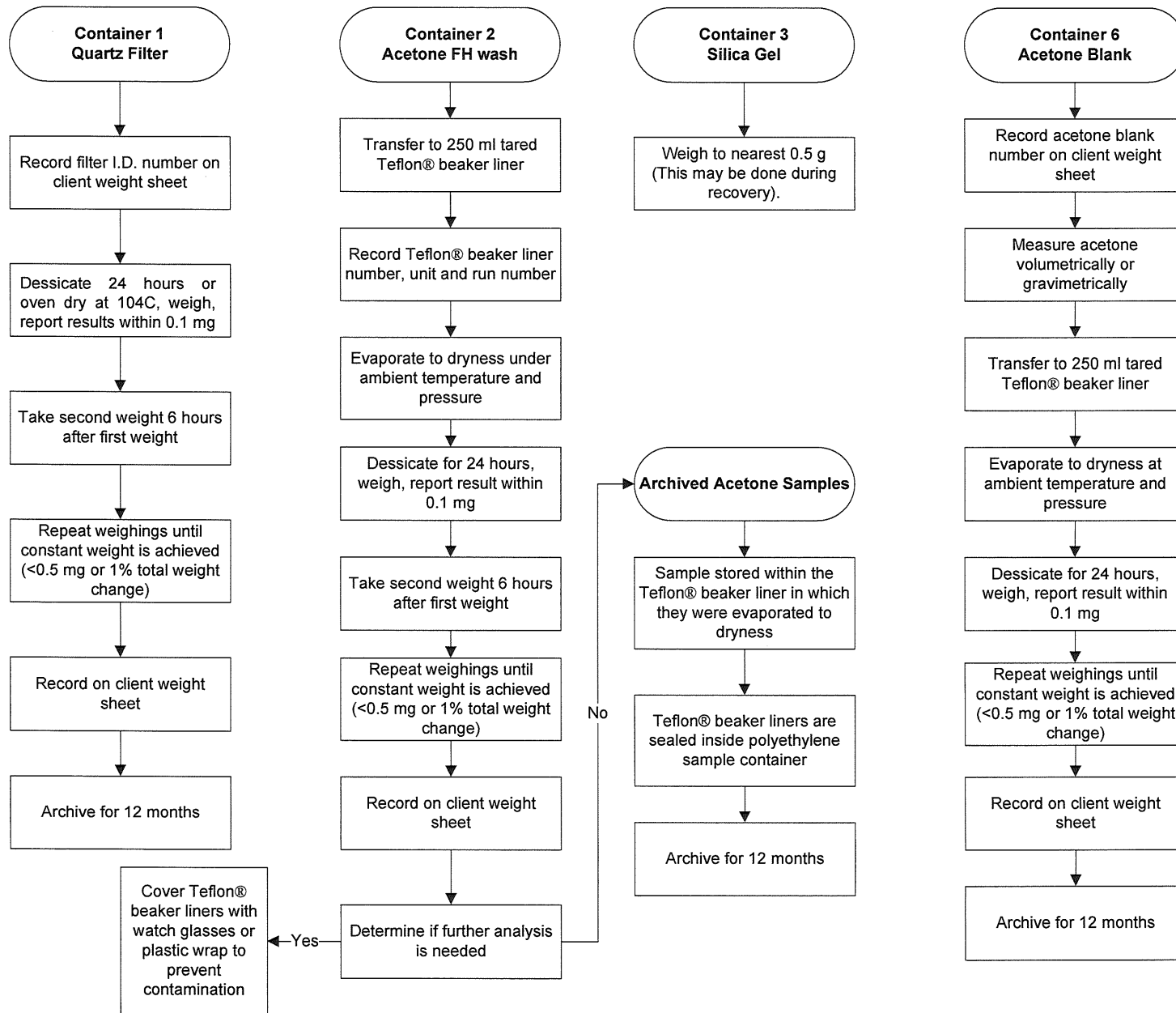
\*As an alternative to baking glassware, a field train proof blank can be performed on the sampling train glassware.

# EPA Method 5 Sample Recovery Flowchart

- Tare all sample containers before sample collection
- Mark all liquid levels and final weights on the outside of each sample container
- Seal all sample containers with Teflon tape
- If recycling, bake silica gel for two hours at 350 degrees F (175 degrees C)



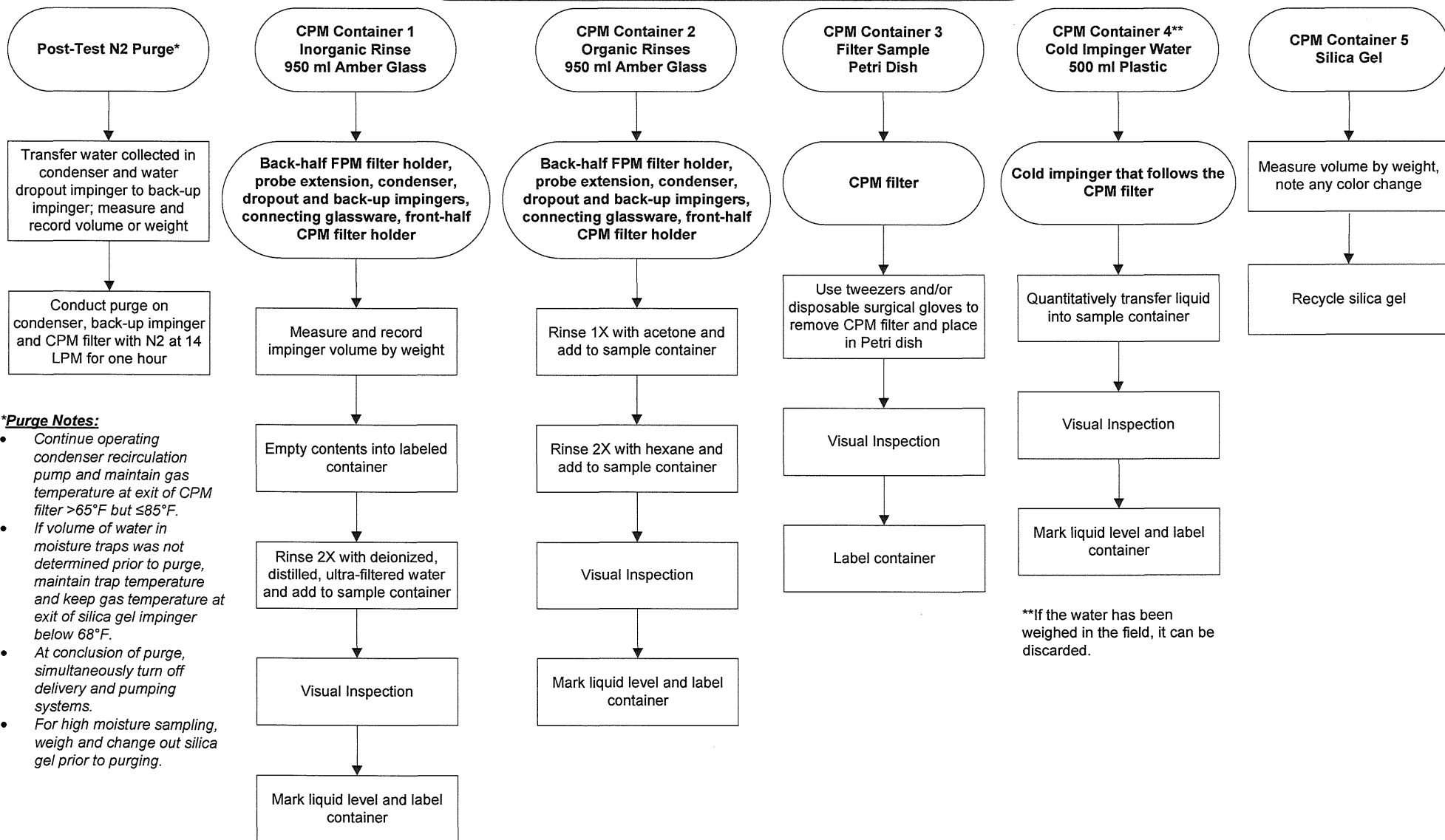
# EPA Method 5 Analytical Flowchart





# EPA Method 202 Sample Recovery Flowchart (1 of 2)

- Tare all sample containers before sample collection
- Mark all liquid levels and final weights on the outside of each sample container
- Seal all sample containers with Teflon tape
- If recycling, bake silica gel for two hours at 350 degrees F (175 degrees C)
- Samples must be maintained at or below 85 degrees F (30 degrees C) during shipping.



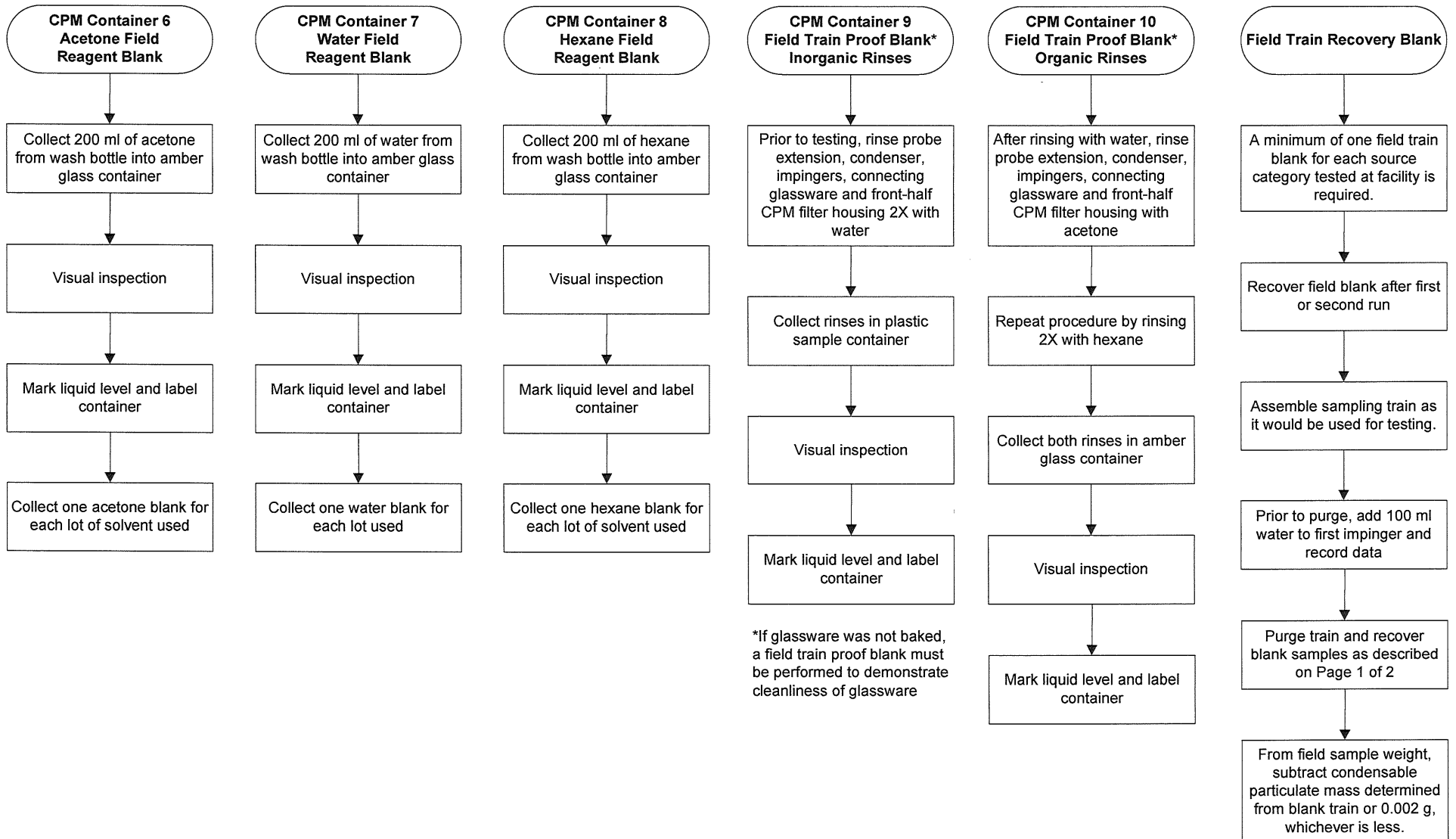
**\*Purge Notes:**

- Continue operating condenser recirculation pump and maintain gas temperature at exit of CPM filter >65°F but ≤85°F.
- If volume of water in moisture traps was not determined prior to purge, maintain trap temperature and keep gas temperature at exit of silica gel impinger below 68°F.
- At conclusion of purge, simultaneously turn off delivery and pumping systems.
- For high moisture sampling, weigh and change out silica gel prior to purging.

\*\*If the water has been weighed in the field, it can be discarded.

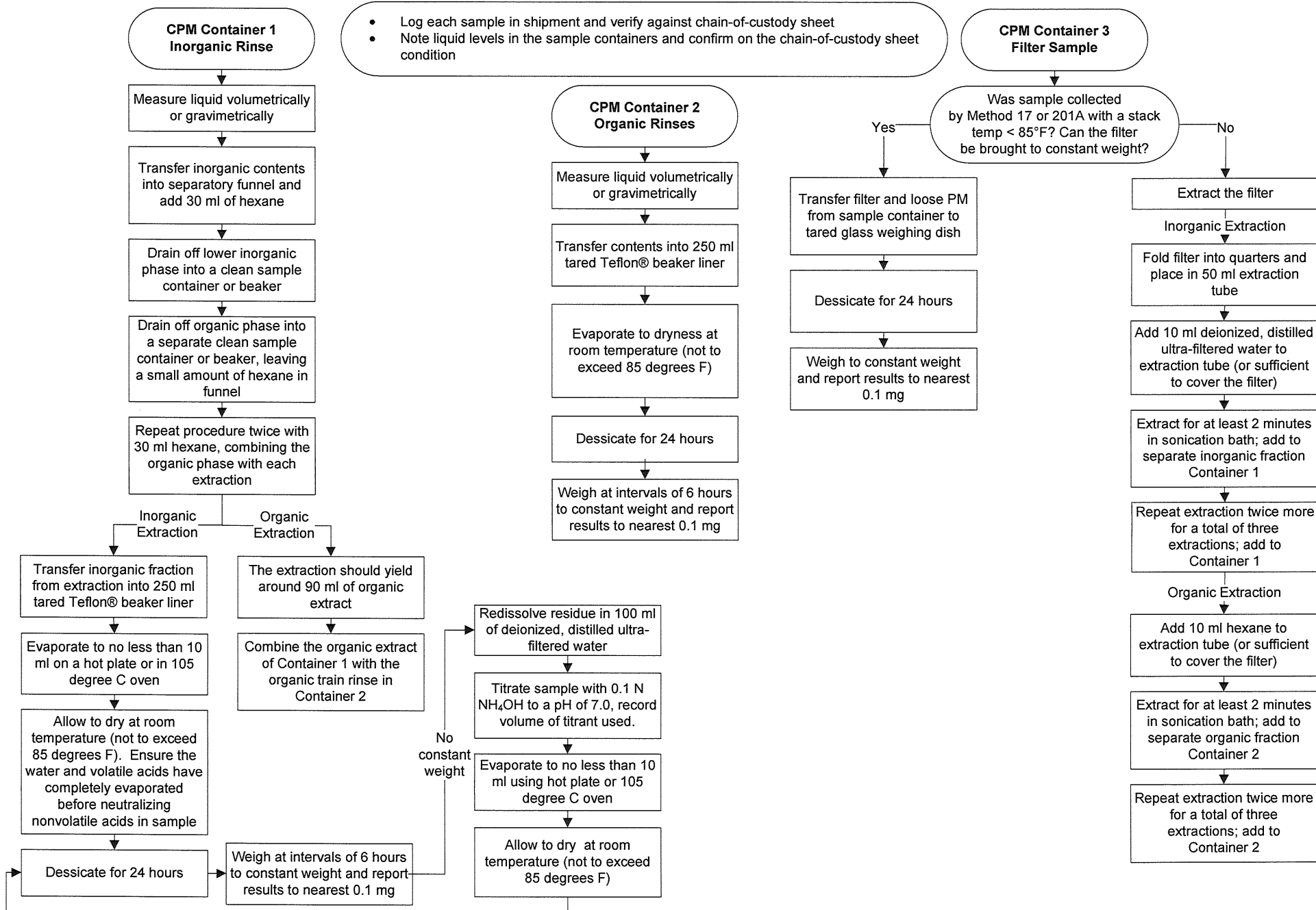
## EPA Method 202 Sample Recovery Flowchart (2 of 2)

- Tare all sample containers before sample collection
- Mark all liquid levels and final weights on the outside of each sample container
- Seal all sample containers with Teflon tape
- If recycling, bake silica gel for two hours at 350 degrees F (175 degrees C)
- Samples must be maintained at or below 85 degrees F (30 degrees C) during shipping.



# EPA Method 202 Analytical Flowchart (1 of 2)

- Log each sample in shipment and verify against chain-of-custody sheet
- Note liquid levels in the sample containers and confirm on the chain-of-custody sheet condition



## EPA Method 202 Analytical Flowchart (2 of 2)

- Log each sample in shipment and verify against chain-of-custody sheet
- Note liquid levels in the sample containers and confirm on the chain-of-custody sheet condition

