

Relative Accuracy Test Audit

Marathon Petroleum Company LP

at the Marathon Detroit Refinery in Detroit, MI

on the West Plant H₂S Fuel Gas

subject to
40CFR60, Appendix F
Permit No. MI-ROP-A9831-2012c

prepared for



Test Date: June 2, 2022 Erthwrks Project No. 9049.1.B3

A9881-test-20220602









Endorsement Page

This report was developed in accordance with the requirements designated in the applicable regulatory permit(s) and or regulatory rules. To the best of my knowledge the techniques, instrumentation, and calculations presented in this report will serve to accurately and efficiently detail the results of the test campaign requirements.

	•
Name:	Jason Dunn
Title:	QC Specialist
Signature	:. J_P_

Erthwrks, Inc.

This report has been reviewed for accuracy and completeness. The actions presented in this report are, to the best of my knowledge, an accurate representation of the results and findings of the test campaign. Erthwrks, Inc. operates in conformance with the requirements on ASTM D7036-04 Standard Practice for Competence of Air Emission Testing Bodies and is accredited as such by the Stack Testing Accreditation Council (STAC) and the American Association for Laboratory Accreditation (A2LA).

Name: Luke Morrison Title: Project Manager Signature: Municipal Municipal



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1.0 INTRODUCTION

1.1 Identification, location and dates of tests

Erthwrks, Inc. was contracted to conduct a relative accuracy test audit (RATA) on the continuous emissions monitoring system (CEMS) associated with the West Plant Fuel Gas system. The CEMS measures hydrogen sulfide (H₂S) concentration of the fuel gas. The CEMS is in operation at the Marathon Detroit Refinery, located in Detroit, MI. The RATA test was conducted on June 2, 2022.

1.2 Purpose of Testing

This CEMS RATA program was conducted to demonstrate the accuracy and reliability of the CEMS used to demonstrate the continuous emission compliance of each unit. All testing and audit procedures were conducted in accordance with the requirements set forth in the USEPA Title 40, Code of Federal Regulations (CFR), Part 60, Appendix B and F, which defines the CEMS performance specifications and testing procedures.

The following methods were utilized during this test program:

-EPA Method 15 for H₂S concentration

11.3 Contact Information

Marathon Petroleum Company LP

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Erthwrks, Inc.

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2.0 SUMMARY OF RESULTS

Table 2.1: West Plant Fuel Gas H₂S Analyzer RATA Results

Pollutant	Performance	Relative	Applicable	Pass/Fail
Measured	Specification	Accuracy	Limit	
H ₂ S (ppmv)	Performance Spec. 7	1.0% <i>RA_{AS}</i>	<10%	Pass

3.0 SOURCE DESCRIPTION

Table 3.1: West Plant Fuel Gas H₂S Analyzer Description

Pollutant	Analyzer	Analyzer	Detection	Serial Number
Measured	Manufacturer	Model	Principle	
H ₂ S	ABB	PGC2000	GC FPD	US4080110400003009

3.1 Applicable permit and source designation

The Marathon Detroit Refinery operates the West Plant Fuel Gas H₂S analyzer under the 40CFR Part 60, Appendix F. Under these regulations, the refinery is required to conduct an annual RATA to demonstrate the relative accuracy of the CEMS associated with this unit.

3.2 Type and quantity of materials processed during tests

During the emission testing on June 2, 2022, at the Marathon Detroit Refinery, the West Plant H₂S Fuel Gas was tested while operating at normal operations.

4.0 SAMPLING AND ANALYTICAL PROCEDURES

4.1 Description of sampling and field procedures

Erthwrks completed this CEMS audit project utilizing all applicable test methods specified in 40 CFR Part 60, Appendix A and B. Specifically, this emission testing program entailed the execution of the 40 CFR Part 60, Appendix B, Performance Specifications 7. These documents define the specifications and test procedures for H₂S CEMS. The RATA required by these regulations was conducted utilizing a mobile emission testing laboratory.

The RATA test is a direct comparison of the CEMS monitoring data with that data collected from an independently operated EPA reference method tests for each pollutant, following

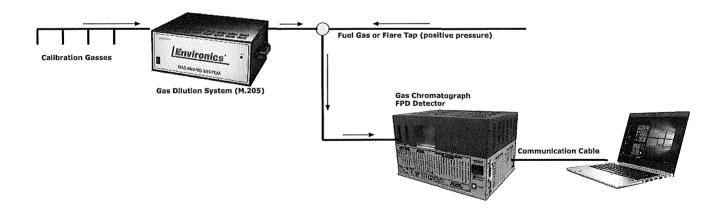


all the quality assurance and quality control procedures as required in the method. The analysis of the sample stream was conducted following all procedures as specified in USEPA Method 15. For this, Erthwrks utilized an SRI Model 8610 Gas Chromatograph (GC) equipped with an FPD detector. This instrumentation is able to separate and analyze separately each individual component. Three calibration gas concentrations, using a calibration gas dilution system, were sent to the GC and analyzed in triplicate. These triplicate values where recorded and averaged. A graphical plot of concentration versus the calibration area values was created and used to calculate the concentration of the sample. All data from this analysis and all raw gas chromatograph shots are found in Attachment B. Post-test analysis of the mid-calibration standard was performed and found to be within 5% of the original curve, therefore no additional quality assurance measurements were necessary.

The calibration gases were generated using a gas dilution system following all QAQC procedures of EPA Method 205. These activities are documented in Attachment B.

As required by the RATA test procedures, a minimum of nine (9) EPA reference method tests were conducted for each pollutant monitored by the CEMS system. Each of these test runs were conducted for minimum duration of thirty (30) minutes. The results of these reference method tests were compared to CEMS measurement data from the facility data acquisition and handling system DAHS system from the same time periods to determine the relative accuracy of the CEMS. The results of the RATA test are considered acceptable if the calculated relative accuracy when compared directly to the reference method does not exceed 20.0%. Alternatively, for affected units where the average of the reference method measurements is less than 50% of the emission standard, as in this case, the relative accuracy should not exceed 10% with respect to the applicable standard.

The figure below summarizes the Erthwrks GC Sampling System:



4.2 Discussion of sampling procedure or operational variances

Erthwrks, Inc. conducted the emission testing with no sampling or procedural variances.



Attachment A
Detailed Results of Emission Test

Erthwrks Relative Accuracy Test Audit--H₂S RATA **Performance Specification 7**

West Plant Fuel Gas

H₂S RATA-Performance Specification 7

Test Run	Run 1	Run 2	Run 3	Run 4	Run 5	Run 6	Run 7	Run 3	Run 9
Date	6/2/2022	6/2/2022	6/2/2022	6/2/2022	6/2/2022	6/2/2022	6/2/2022	6/2/2022	6/2/2022
Start Time	13:10	13:40	14:10	14:40	15:10	15:40	16:10	16:40	17:10
End Time	13:39	14:09	14:39	15:09	15:39	16:09	16:39	17:09	17:39
RM H₂S (ppmvw)	2.93	2.82	3.10	3.09	3.22	3.17	3.12	3.28	3.19
CEMS H₂S (ppmvw)	4.45	4.31	4.46	4.68	4.56	4.72	4.71	4.93	4.95
Abs. Diff.	-1.52	-1.49	-1.36	-1.59	-1.34	-1.55	-1.59	-1.65	-1.76
Accept or Reject	Accept								

Applicable Standard (ppmv) Mean of the Difference (davg) Standard Deviation (S_d) Confidence Coefficient (CC)

Relative Accuracy via AS, RA AS

 $\dagger RA_{AS}$ (Applicable Standard) must be less then 10%

-1.54 0.13 0.10 1.03%

160

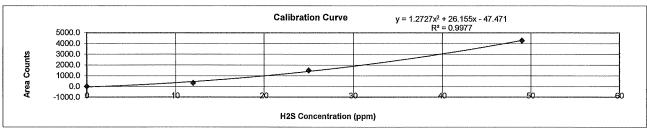
 \leftarrow Pass

Attachment B Sampling and Analysis Worksheets

Erthwrks GC Calibration and Analysis Data

Initial Calibration

H2S Concentration GC Results	0 0.4013	0.8268	0.3514	0.6058	0.3734
Average Response	0.51				
Standard Deviation	0.20				
MDL (3 times standard deviation)	0.61				
		_			
H2S Concentration	12				
GC Results	333.3	322.2	326.8		
% Diff	-1.80%	1.59%	0.20%		
Average Response	327.46				
		•			
H2S Concentration	25				
GC Results	1487.6	1490.8	1498.5		
% Diff	0.32%	0.10%	-0.41%		
Average Response	1492.28				
		•			
H2S Concentration	49	····			
GC Results	4274.2	4263.9	4283.0		
% Diff	-0.01%	0.23%	-0.22%		
Average Response	4273.69				
0 11: 1	~ ~ ~ ~ ~	ı			
Sample Line Loss	24.95	,			
GC Results	1558.9	1559.3	1576.4		
% Diff	0.38%	0.36%	-0.74%		
Average Response	1564.87				
<20% of Direct	-4.86%				



Data from Calibration Curve

ullis	tation outre	
a:	1.2727	0.61 MDL
b:	26.1550	
R ² :	0.9977	
c:	-47.471	
٠.,		ı

Test Runs

	START	END	
Run 1 Time	13:10	13:39	
Run 1 GC Response	39.4	44.0	36.9
Average Response	40.1		
Run Result	2.9 ppm		2.9 ppm
	START	END	
Run 2 Time	13:40	14:09	
Run 2 GC Response	36.8	34.2	38.7
Average Response	36.6		
Run Result	2.8 ppm		2.8 ppm
	START	END	
Run 3 Time	14:10	14:39	
Run 3 GC Response	46.4	43.6	47.7
Average Response	45.9		
Run Result	3.1 ppm		3.1 ppm

Erthwrks GC Calibration and Analysis Data

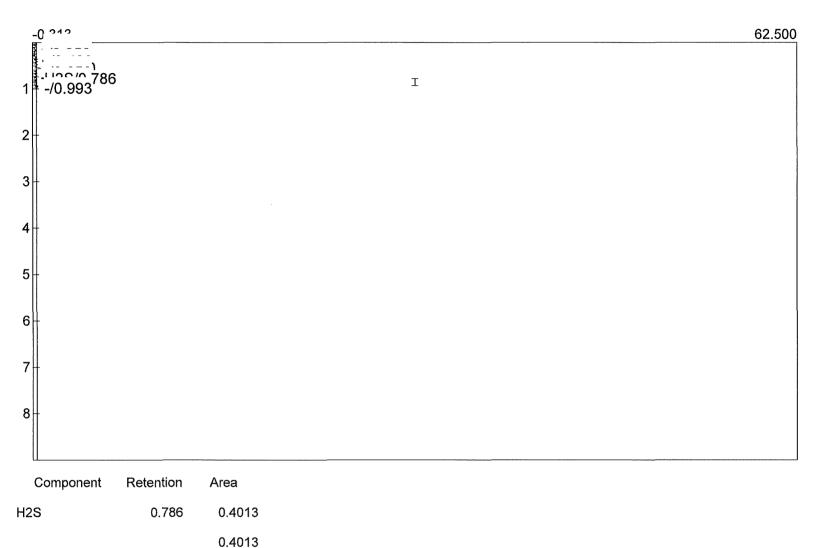
Dun 4 Times	<i>START</i> 14:40	<i>END</i> 15:09		
Run 4 Time	46.0	44.8	45.5	
Run 4 GC Response	45.4	44.0	40.0	
Average Response			2 4 nnm	
Run Result	3.1 ppm		3.1 ppm	
	START	END		
Run 5 Time	15:10	15:39		
Run 5 GC Response	46.4	49.0	54.4	
Average Response	50.0	40.0	0-11	
Run Result	3.2 ppm		3.2 ppm	
Ruit Result	UIL PPIII		<u> </u>	
	START	END		
Run 6 Time	15:40	16:09		
Run 6 GC Response	51.9	48.4	44.7	
Average Response	48.3			
Run Result	3.2 ppm		3.2 ppm	
	START	END		
Run 7 Time	16:10	16:39		
Run 7 GC Response	45.8	43.6	50.4	
Average Response	46.6	<u></u>		
Run Result	3.1 ppm		3.1 ppm	
	START	END		
Run 8 Time	16:40	17:09		
Run 8 GC Response	55.3	51.7	49.2	
Average Response	52.1	L		
Run Result	3.3 ppm		3.3 ppm	
		=115		
D. O.T.	START	<i>END</i> 17:39		
Run 9 Time	17:10		45.9	
Run 9 GC Response	51.8 48.9	48.9	45.9	
Average Response Run Result		1	2 2 nnm	
Run Result	3.2 ppm		3.2 ppm	
Post Cal GC Response	1525.36	1516.94	1476,34	
Average Response	1506	1010.04	1470.04	
% Difference	-0.93%	PASS Post T	est Calibration Chec	<u> </u>
/o Dilletellice	-0.00/0	1 400 1 031 1	cat cambiation offect	

Client: Marathon Detroit
Analysis date: 06/02/2022 12:55:40
Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison

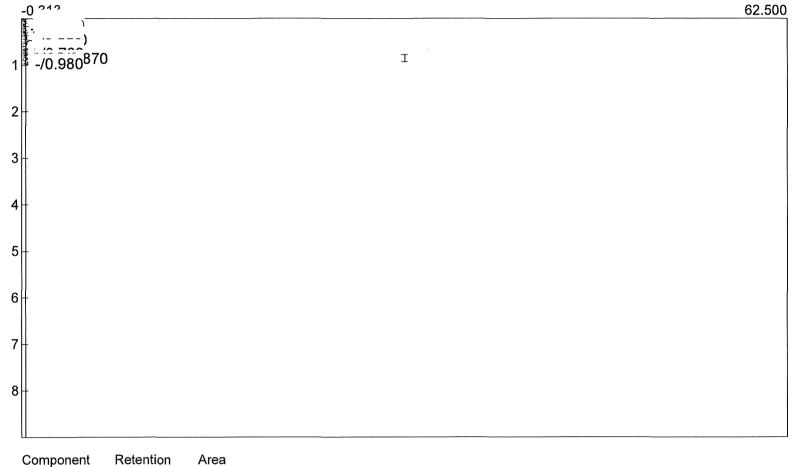


Client: Marathon Detroit Analysis date: 06/02/2022 12:57:46 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



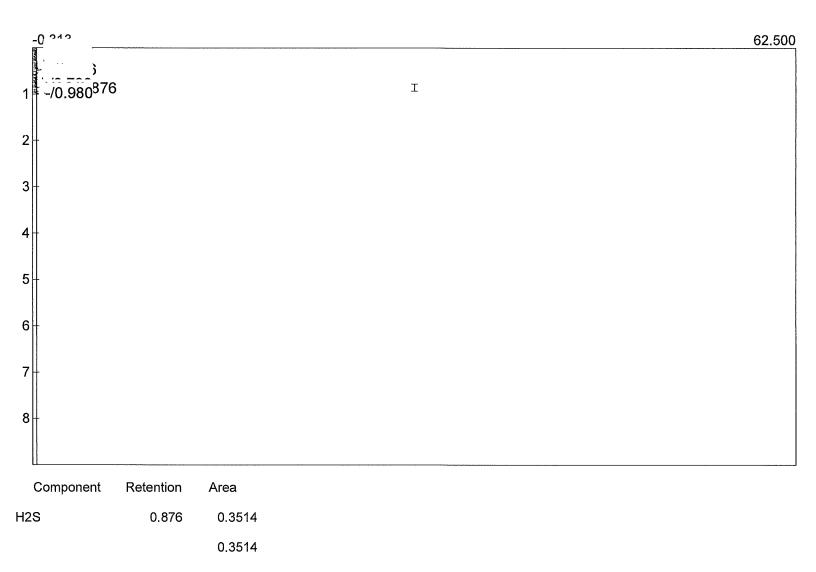
H2S 0.870 0.8268 0.8268

Client: Marathon Detroit
Analysis date: 06/02/2022 12:59:52
Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison

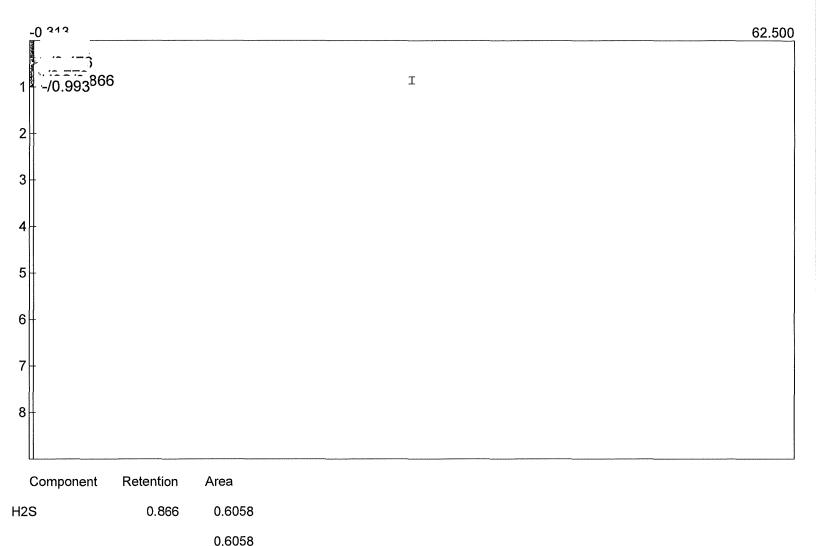


Client: Marathon Detroit
Analysis date: 06/02/2022 13:01:57
Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison

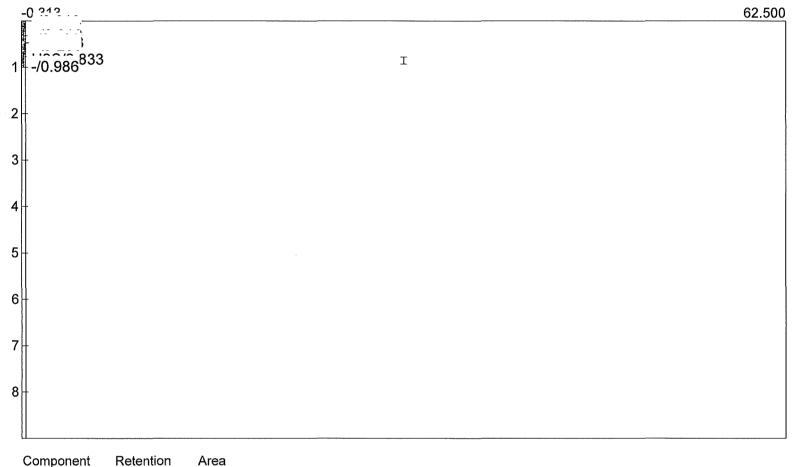


Client: Marathon Detroit Analysis date: 06/02/2022 13:04:03 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



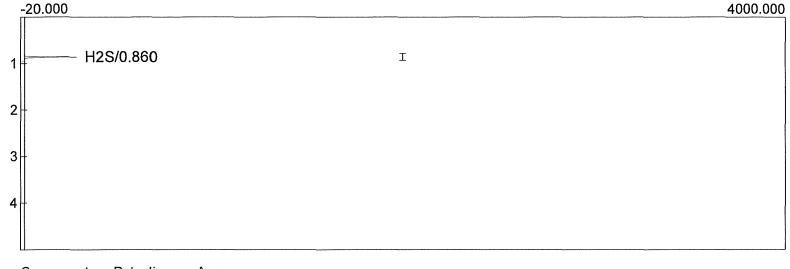
Component Retention Area
H2S 0.833 0.3734
0.3734

Client: Marathon Detroit Analysis date: 06/02/2022 12:19:48 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



Component Retention Area

H2S 0.860 333.3414

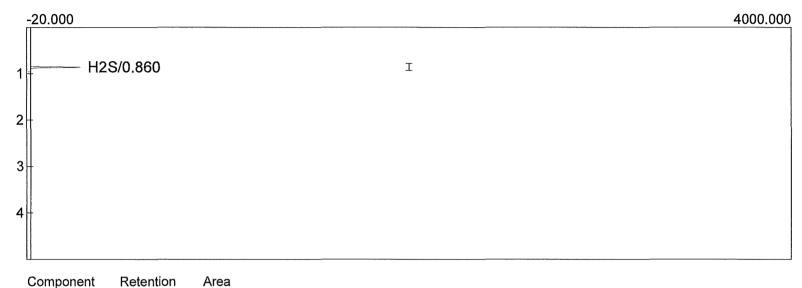
333.3414

Client: Marathon Detroit Analysis date: 06/02/2022 12:22:40 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



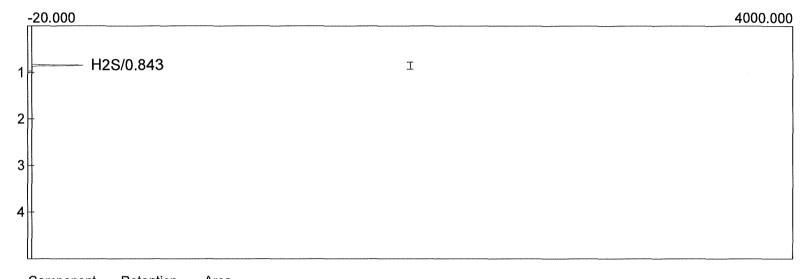
H2S 0.860 322.2428 322.2428

Client: Marathon Detroit
Analysis date: 06/02/2022 12:24:46

Method: Direct Injection Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



Component Retention Area

H2S 0.843 326.7950

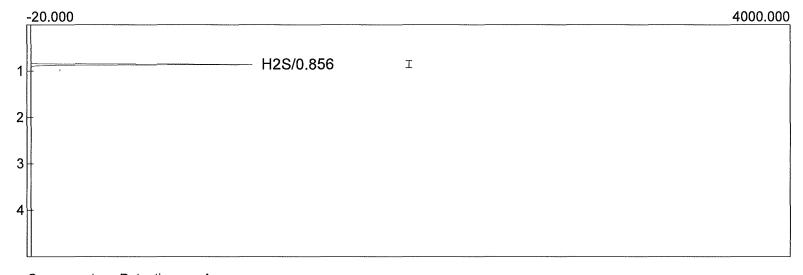
326.7950

Client: Marathon Detroit Analysis date: 06/02/2022 12:11:24 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



Component Retention Area
H2S 0.856 1487.5668

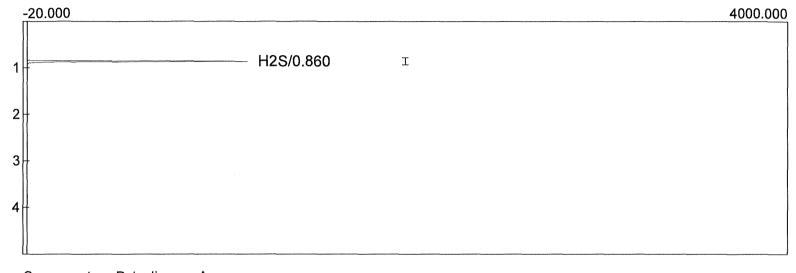
1487.5668

Client: Marathon Detroit Analysis date: 06/02/2022 12:13:30 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



Component Retention Area
H2S 0.860 1490.7994

1490.7994

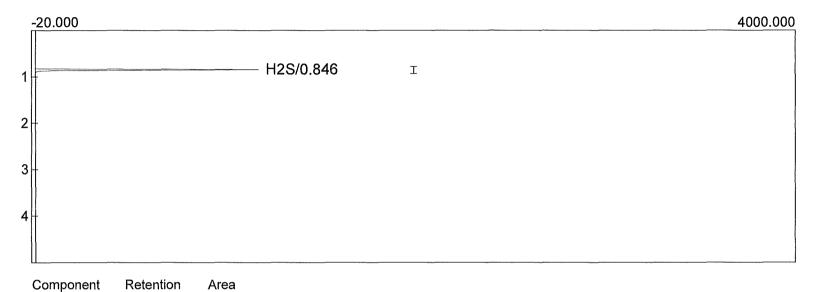
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Description: 9049.1.B3

H2S

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



1498.4793 1498.4793

0.846

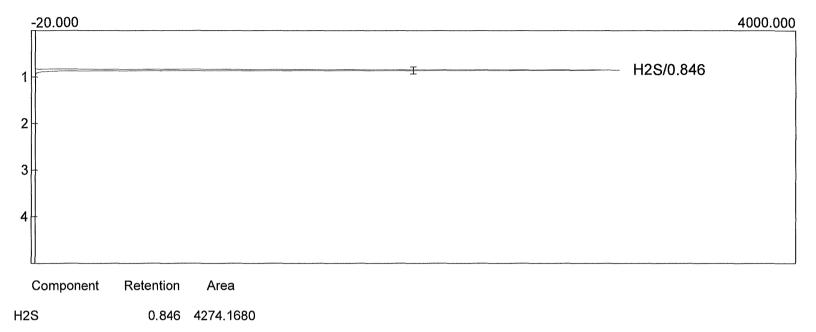
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Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

4274.1680

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison

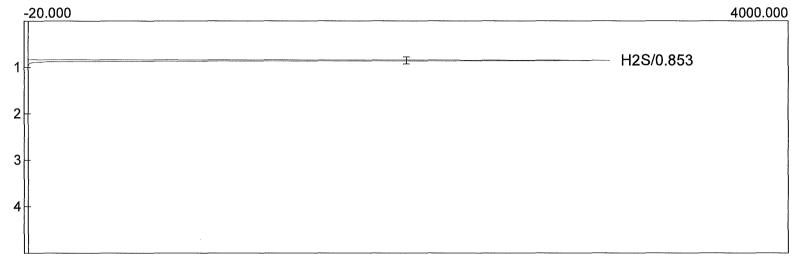


Client: Marathon Detroit Analysis date: 06/02/2022 12:06:52 Method: Direct Injection

Method: Direct Injection Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



Component Retention Area

H2S 0.853 4263.9304

4263.9304

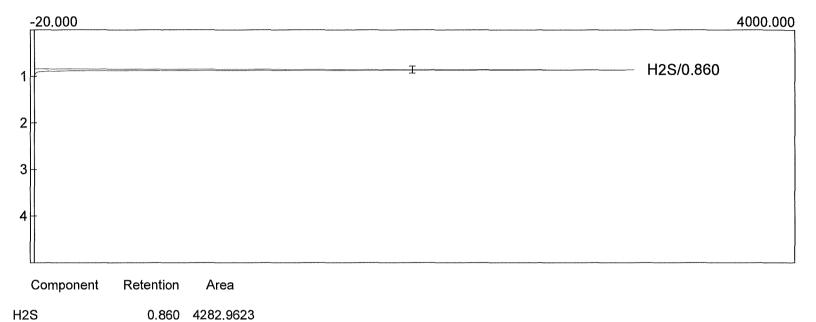
Client: Marathon Detroit Analysis date: 06/02/2022 12:08:58 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

4282.9623

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison

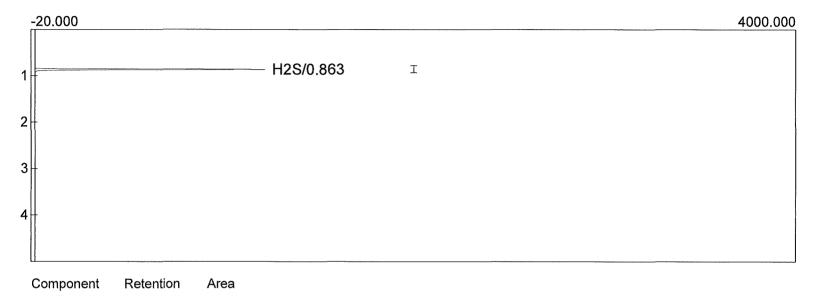


Client: Marathon Detroit
Analysis date: 06/02/2022 12:41:02
Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



0.863 1558.9204 1558.9204

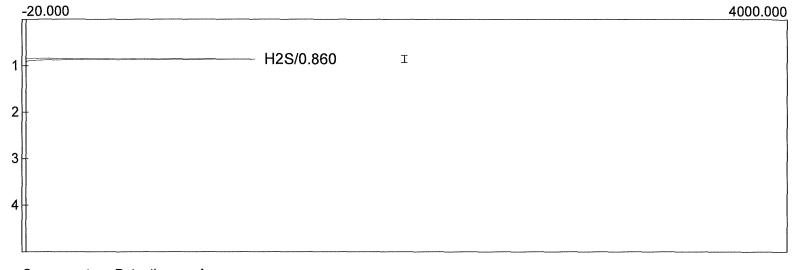
H2S

Client: Marathon Detroit Analysis date: 06/02/2022 12:46:12 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



Component Retention Area
H2S 0.860 1559.3041

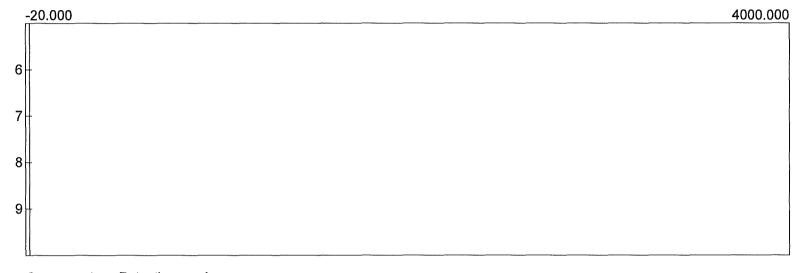
1559.3041

Client: Marathon Detroit Analysis date: 06/02/2022 12:48:18 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



Component Retention Area
H2S 0.846 1576.3666

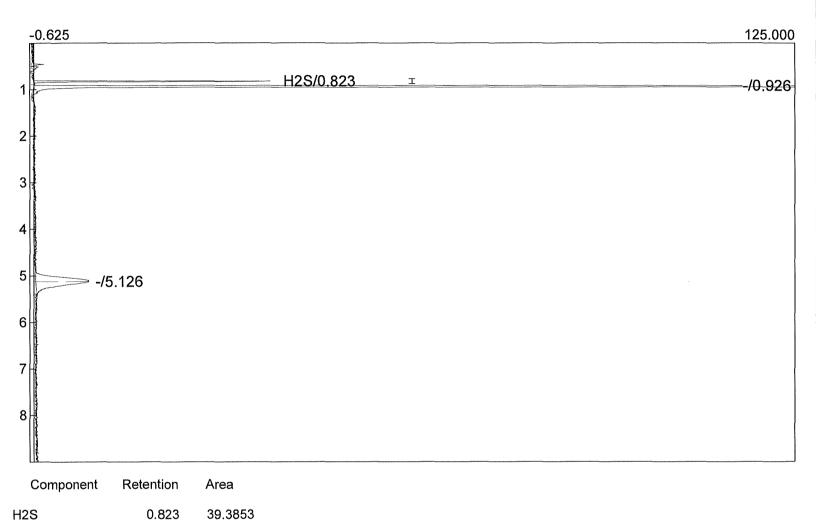
1576.3666

Client: Marathon Detroit Analysis date: 06/02/2022 13:10:51 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



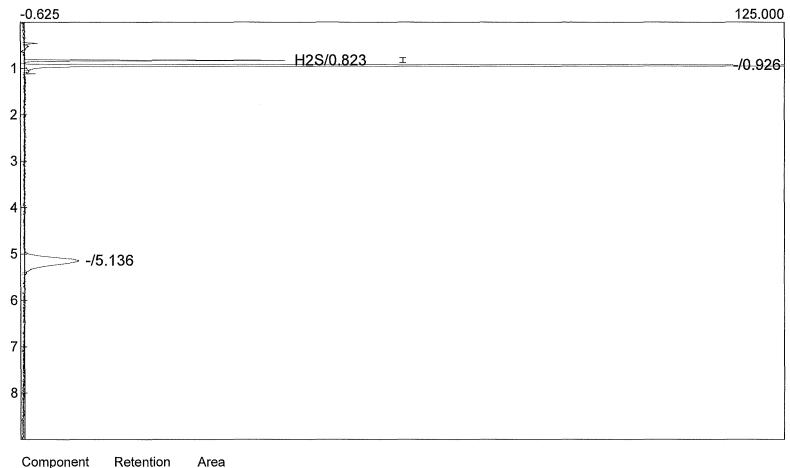
39.3853

Client: Marathon Detroit
Analysis date: 06/02/2022 13:20:51
Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



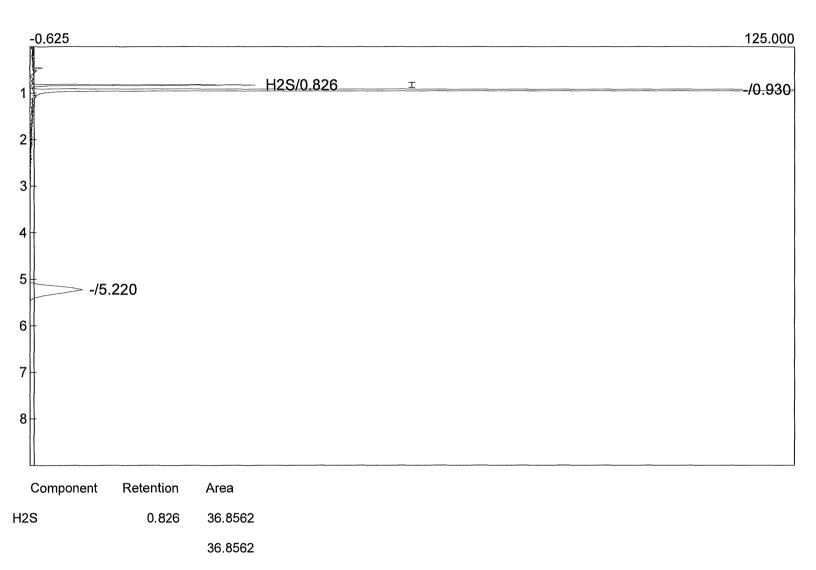
H2S 0.823 43.9941 43.9941

Client: Marathon Detroit
Analysis date: 06/02/2022 13:30:51
Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



Run Chromatogram

RECEIVED

AUG 0 1 2022

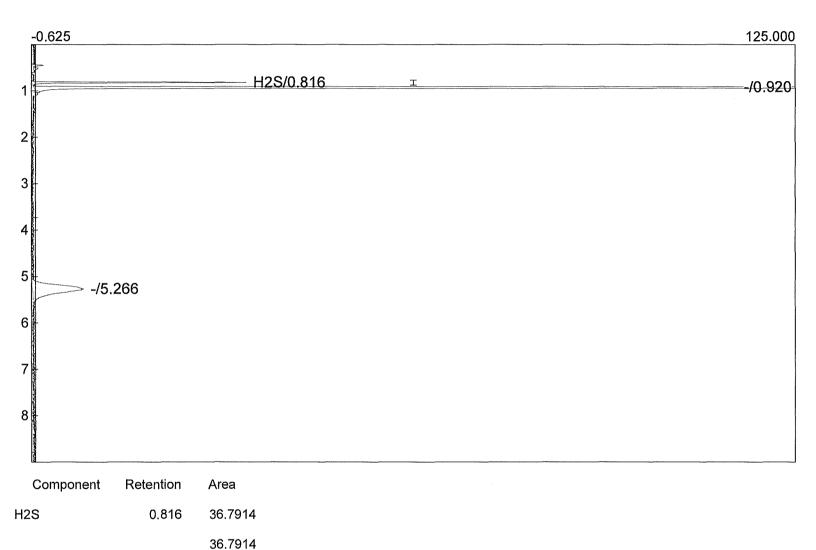
AIR QUALITY DIVISION

Client: Marathon Detroit Analysis date: 06/02/2022 13:40:51 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison

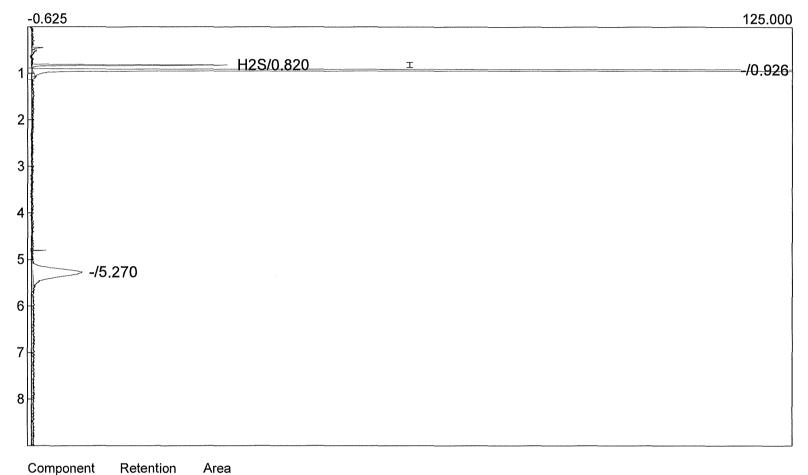


Client: Marathon Detroit Analysis date: 06/02/2022 13:50:51 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



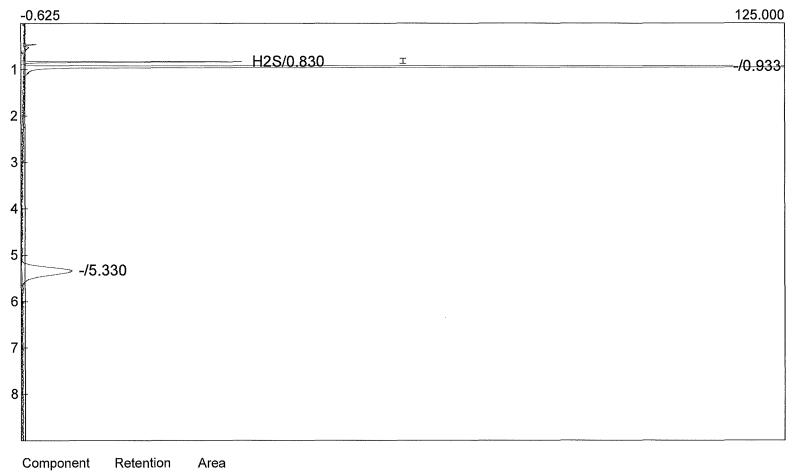
H2S 0.820 34.2047 34.2047

Client: Marathon Detroit
Analysis date: 06/02/2022 14:00:51
Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



Component Retention Area

H2S 0.830 38.6702

38.6702

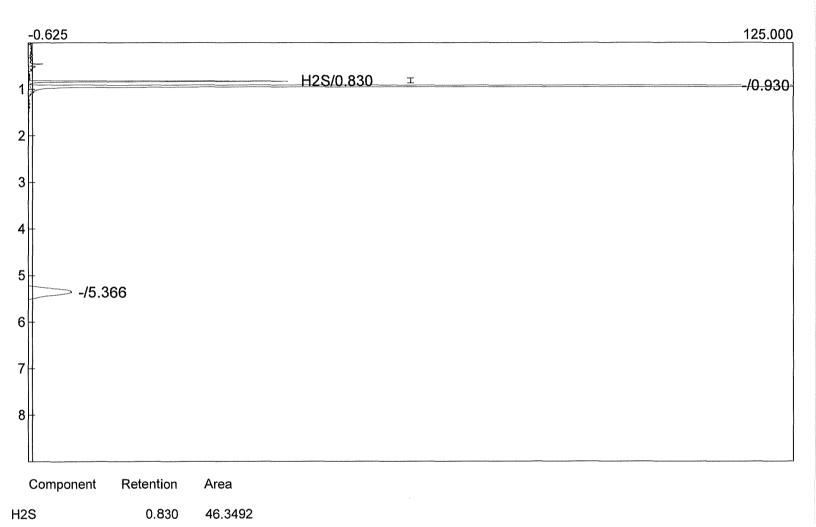
Client: Marathon Detroit
Analysis date: 06/02/2022 14:10:51
Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

46.3492

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



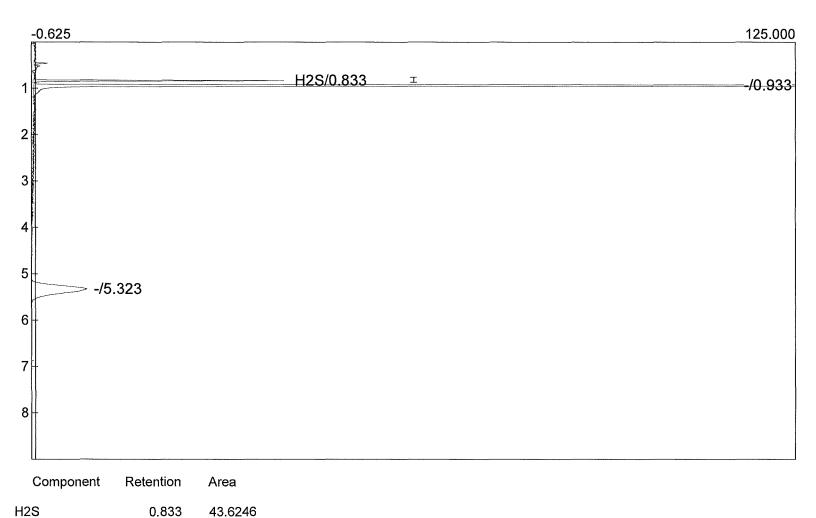
Client: Marathon Detroit Analysis date: 06/02/2022 14:20:51 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

43.6246

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



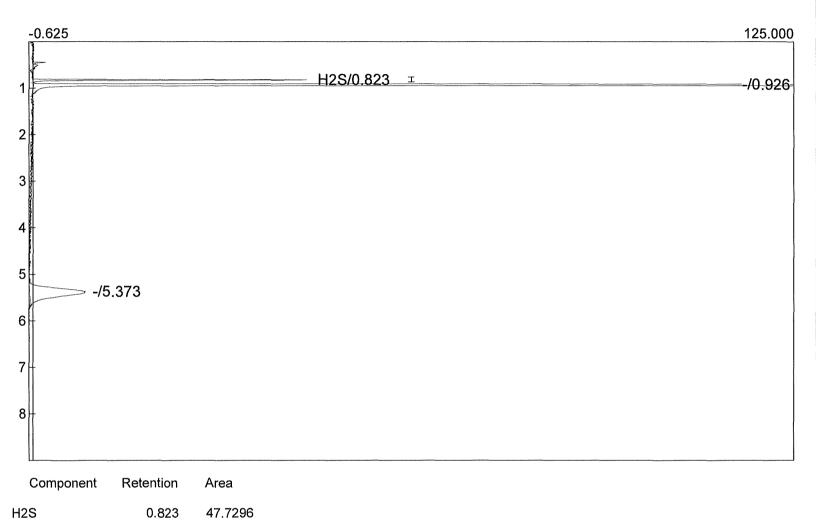
Client: Marathon Detroit Analysis date: 06/02/2022 14:30:52 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

47.7296

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison

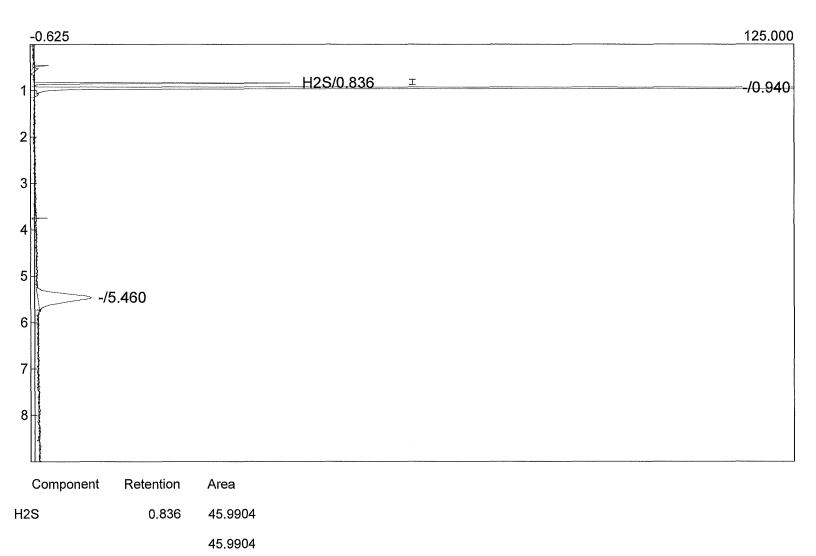


Client: Marathon Detroit
Analysis date: 06/02/2022 14:40:52
Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison

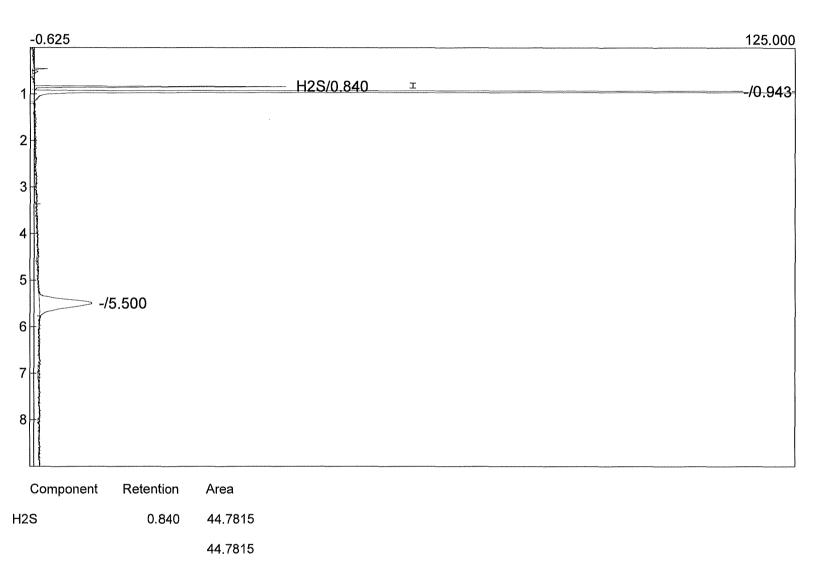


Client: Marathon Detroit Analysis date: 06/02/2022 14:50:52 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison

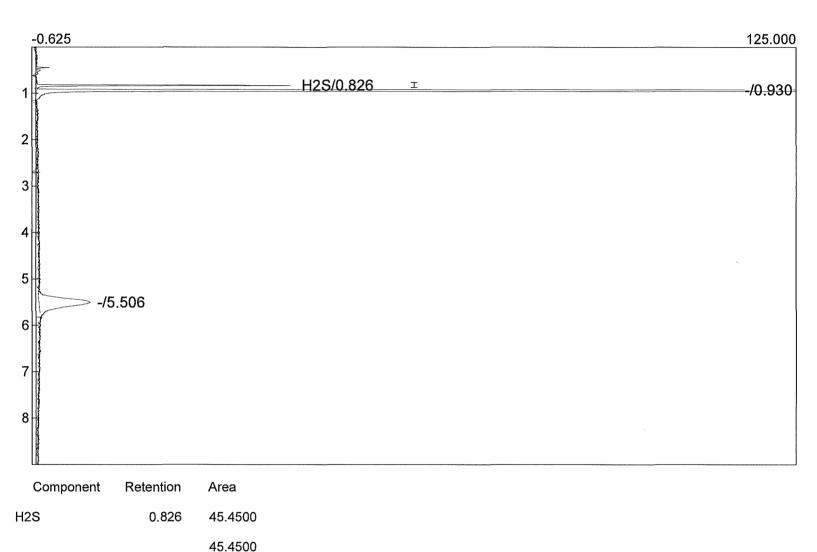


Client: Marathon Detroit Analysis date: 06/02/2022 15:00:52 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



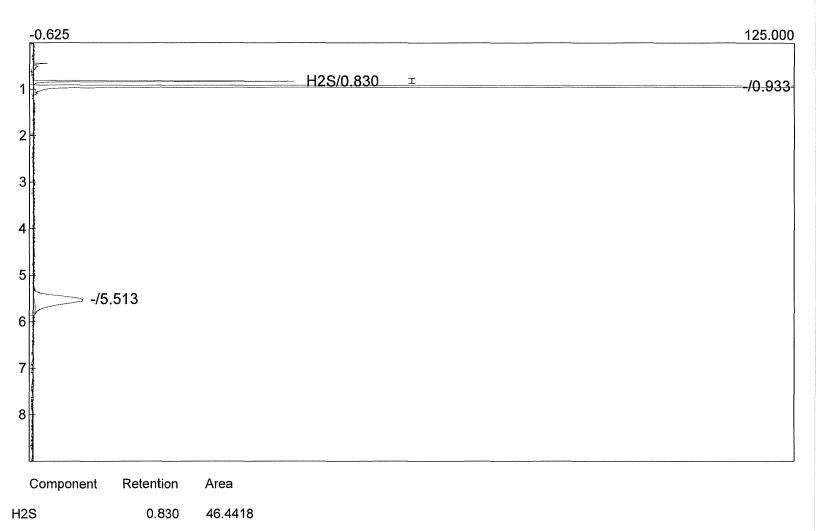
Client: Marathon Detroit Analysis date: 06/02/2022 15:10:52 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

46.4418

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



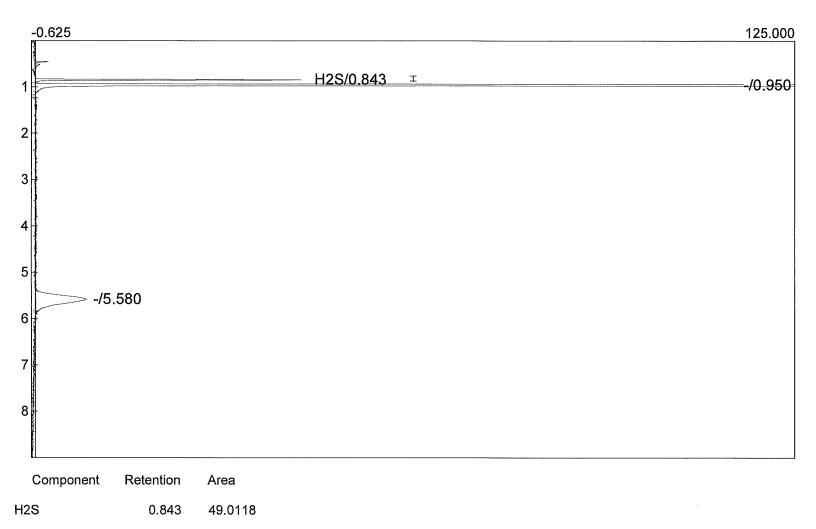
Client: Marathon Detroit
Analysis date: 06/02/2022 15:20:52
Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

49.0118

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



Client: Marathon Detroit Analysis date: 06/02/2022 15:30:52 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

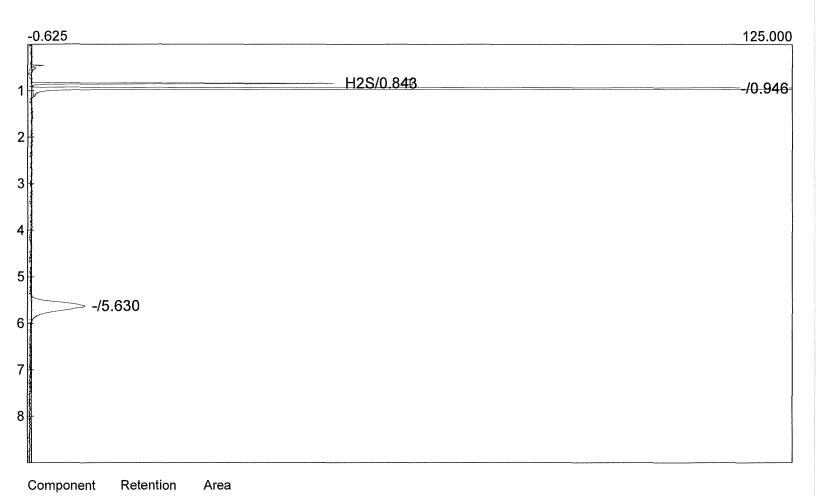
0.843

H2S

54.4402

54.4402

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



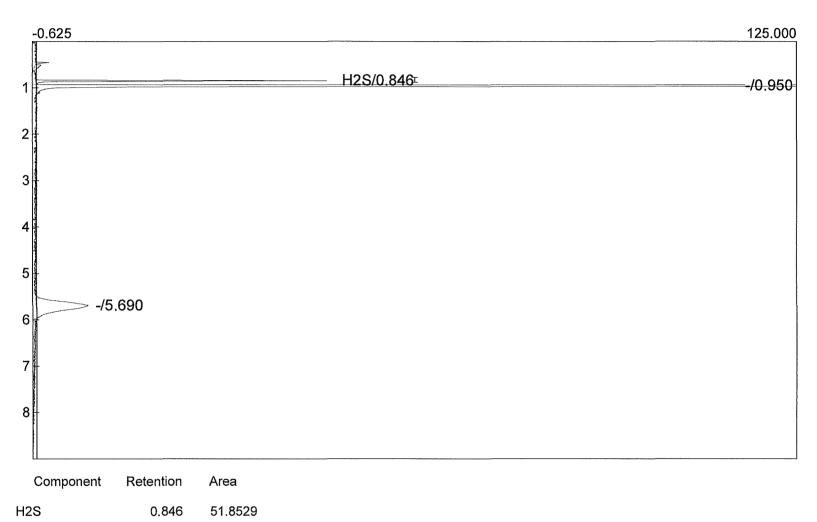
Client: Marathon Detroit
Analysis date: 06/02/2022 15:40:52
Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

51.8529

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



Client: Marathon Detroit Analysis date: 06/02/2022 15:50:52 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



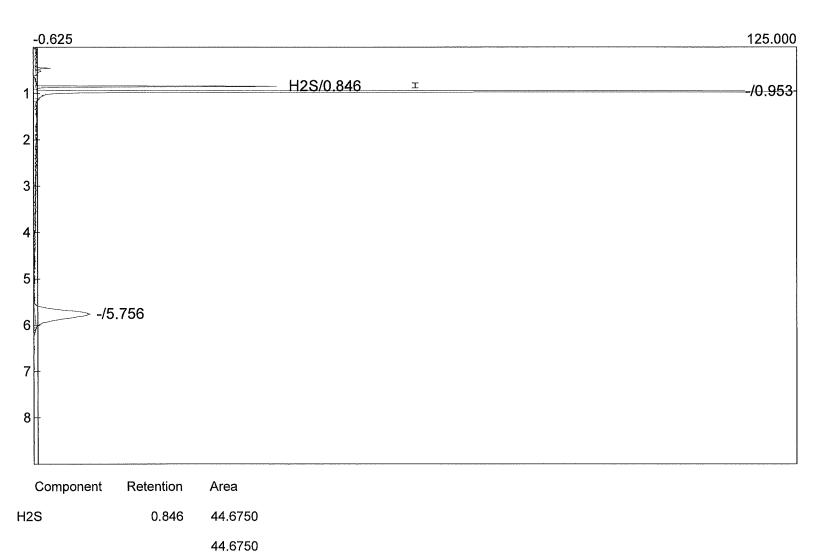
H2S 0.836 48.4417 48.4417

Client: Marathon Detroit
Analysis date: 06/02/2022 16:00:53
Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



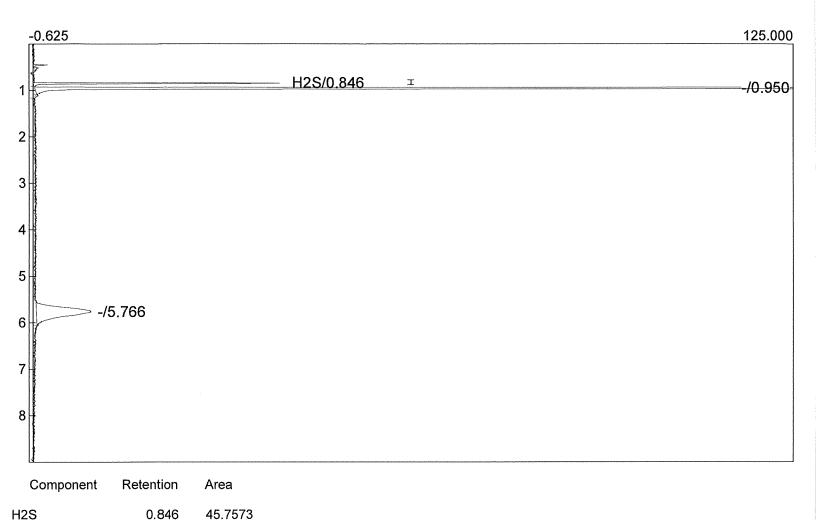
Client: Marathon Detroit Analysis date: 06/02/2022 16:10:53 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

45.7573

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



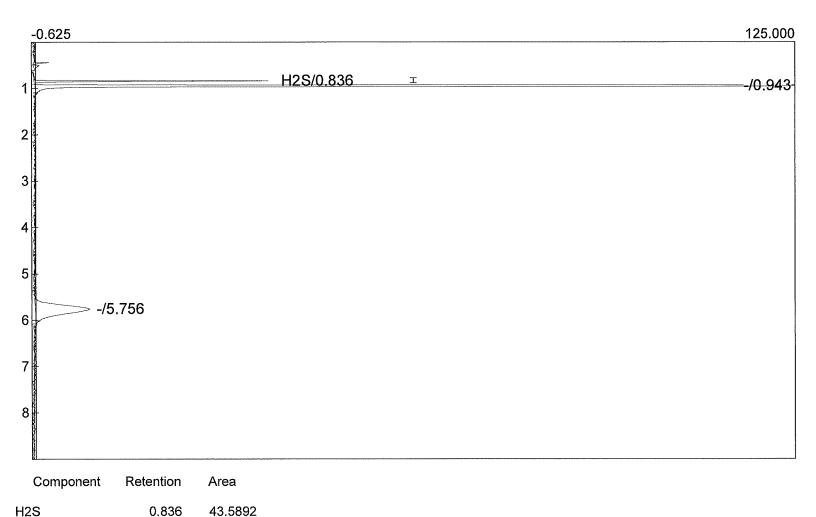
Client: Marathon Detroit Analysis date: 06/02/2022 16:20:53 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

43.5892

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



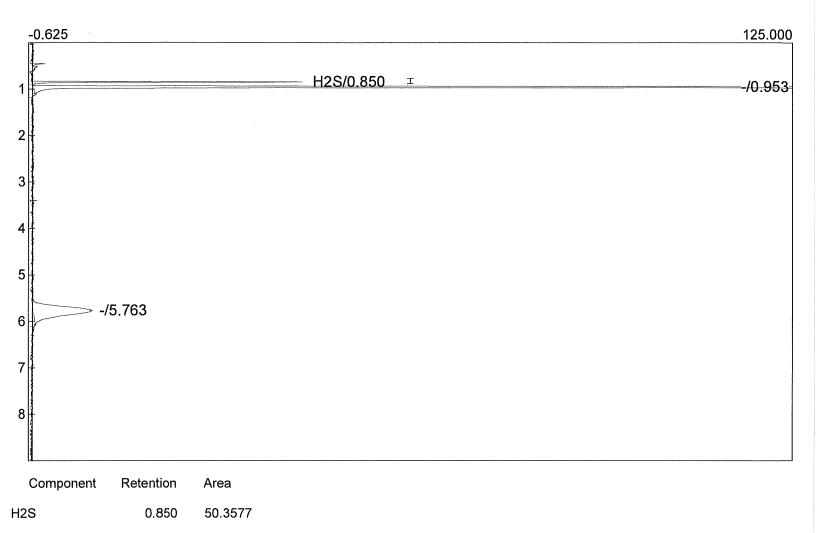
Client: Marathon Detroit Analysis date: 06/02/2022 16:30:53 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

50.3577

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison

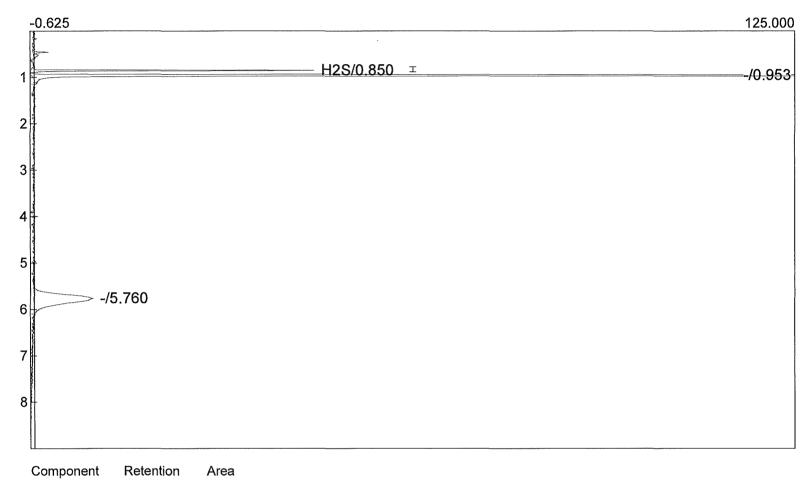


Client: Marathon Detroit
Analysis date: 06/02/2022 16:40:53
Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



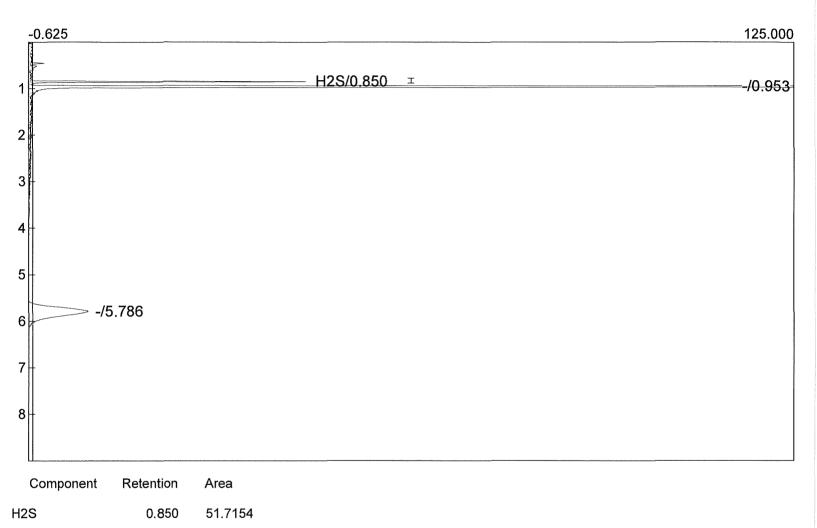
H2S 0.850 55.2954 55.2954

Client: Marathon Detroit Analysis date: 06/02/2022 16:50:53 Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison



51.7154

Client: Marathon Detroit
Analysis date: 06/02/2022 17:00:53
Method: Direct Injection

Description: 9049.1.B3

Column: 30RTU-Bond+60MTX

49.2182

Carrier: H2@25 psi Sample: West Plant FG Operator: Luke Morrison

