



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
DETROIT DISTRICT OFFICE



PHILLIP D. ROOS
DIRECTOR

February 1, 2024

VIA EMAIL

Ian W. Ladomer
Deputy Assistant Secretary
Marathon Petroleum Company LP
1300 South Fort Street
Detroit, Michigan 48217

SRN: A9831; Wayne County

Dear Ian W. Ladomer:

VIOLATION NOTICE

On January 24, 2024, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received electronically a Rule 912 notification report dated January 24, 2024, from Marathon Petroleum Company LP (Marathon), located at 1001 South Oakwood, Detroit, Michigan. The signed hard copy of the report was received on January 26, 2024. Staff reviewed the report to determine Marathon’s compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; the conditions of Renewable Operating Permit (ROP) number MI-ROP-A9831-2012c; and the conditions of Permit to Install (PTI) number 113-22.

Based on a review of the Rule 912 notification report, the following air pollution violation was observed:

Process Description	Rule/Permit Condition Violated	Comments
Sulfur Block 2, Area 72, removes hydrogen sulfide from acid gas and converts it to elemental sulfur. The exhaust tail gas from the process is routed to a thermal oxidizer. Designated in the facility’s ROP and PTI No. 113-22 as EU72-SULRBLOCK2-S1.	PTI No. 113-22, EU72-SULRBLOCK2-S1, Special Condition (SC) I.2; ROP No. MI-ROP-A9831-2012c, EU72-SULRBLOCK2-S1, SC I.2; 40 CFR 60.102a(f)(1)(i)	The thermal oxidizer exhaust for EU72-SULRBLOCK2-S1 exceeded the sulfur dioxide (SO ₂) limit of 250 ppm, based on a 12-hour average. The Rule 912 report provides that the exceedance lasted for a duration of 35 hours between 9:00 PM on January 14, 2024, through 8:00 AM on January 16, 2024.

Sulfur Block 2, Area 72 (known as the North Plant Sulfur Recovery Unit, or North Plant SRU), removes hydrogen sulfide from acid gas and converts it to elemental sulfur. The exhaust tail gas from the process is routed to a thermal oxidizer. The special conditions applicable to the North Plant SRU are in the facility's ROP, last revised on September 12, 2016, within the emission unit table EU72-SULRBLOCK2-S1. These conditions have since been amended by PTI No. 113-22, issued on September 1, 2022.

The North Plant SRU is subject to the federal Standards of Performance for New Stationary Sources (NSPS) requirements in 40 CFR Part 60 Subpart Ja (Standards of Performance for Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After May 14, 2007). Applicable requirements from NSPS Subpart Ja have been incorporated into the special conditions within the facility's ROP and, subsequently, into PTI No. 113-22.

SC I.2 of EU72-SULRBLOCK2-S1 in both the facility's ROP and in PTI No. 113-22 limits SO₂ emissions within the thermal oxidizer exhaust to not more than 250 ppm by volume, based on a 12-hour average at zero percent oxygen on a dry basis. The basis for this limit is presented in NSPS Ja at 40 CFR 60.102a(f)(1)(i). The SO₂ concentration is monitored using a continuous emissions monitoring system (CEMS), required by SC VI.1 of EU-SULRBLOCK2-S1 in both the ROP and PTI No. 113-22, pursuant to 40 CFR 60.106a(a)(1). Within the Rule 912 report Marathon provides that the SO₂ concentration exceeded the 250 parts per million volume (ppmv) emission limit for a duration of 35 hours between 9:00 PM on January 14, 2024, through 9:00 AM on January 16, 2024, with a maximum recorded 12-hour average SO₂ concentration of 493 ppmv. This exceedance represents 35 individual violations of 40 CFR 60.102a(f)(1)(i), and of SC I.2 of EU-SULRBLOCK2-S1 in both the ROP and PTI No. 113-22.

The AQD notes that in the Rule 912 report, Marathon states that the exceedance lasted for a duration of 36 hours between 9:00 PM on January 14, 2024, through 9:00 AM on January 16, 2024. Upon inspection of the hourly CEMS data provided by Marathon, the hourly period beginning at 8:00 AM and ending at 9:00 AM on January 16, 2024, is included by Marathon within the duration of the exceedance. However, the CEMS data shows the 12-hour average SO₂ concentration to be 236 ppmv for this time, which is less than the 250 ppmv limit, bringing AQD's count to 35 exceedances.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 23, 2024 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Ian W. Ladomer
Marathon Petroleum Company LP
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Please submit the written response to EGLE, AQD, Detroit District, at 3058 West Grand Blvd., Suite 2-300, Detroit, Michigan 48202 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Marathon believes the above observations or statements are inaccurate or do not constitute a violation of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Stephen Weis
Senior Environmental Engineer
Air Quality Division
313-720-5831

cc: Mark Baron, City of Detroit BSEED
Crystal Rogers, City of Detroit BSEED
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Dr. April Wendling, EGLE
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Steve Weis, EGLE