

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

IN THE MATTER OF: )  
)  
Marathon-Ashland Petroleum, ) **FINDING OF VIOLATION**  
LLP. )  
Robinson, Illinois ) EPA-5-99-IL-33  
)  
Proceedings Pursuant to )  
the Clean Air Act, )  
42 U.S.C. §§ 7401 et seq. )  
)

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**Finding of Violation**

The United States Environmental Protection Agency (U.S. EPA) hereby notifies the State of Illinois and Marathon-Ashland Petroleum, LLP (MAP) that U.S. EPA finds that MAP's refinery facility in Robinson, Illinois is in violation of the Clean Air Act (Act), 42 U.S.C. § 7401 et seq. MAP is in violation of Section 111(e) of the Act, 42 U.S.C. § 7411(e), and the regulations setting forth Standards of Performance (NSPS) General Provisions, 40 C.F.R. Part 60, Subpart A as follows:

**Regulatory Authority**

1. The NSPS General Provisions Section applies, among other facilities at the Robinson refinery, to MAP's fuel gas combustion devices, the refinery amine system, and the Sulfur Recovery Plant (SRP).

2. The NSPS, at 40 C.F.R. § 60.11(d), requires the owner or operator to operate at all times, including periods of startup, shutdown and malfunction, all affected facilities and associated air pollution control equipment in a manner consistent with good air pollution control practice.

**Factual Background**

3. MAP owns and operates a refinery located at Marathon Avenue, Robinson, Illinois. Until January 1, 1998, the refinery

was owned and operated by Marathon Oil Company (Marathon).

4. The Robinson refinery, among other emission points, has fuel gas combustion devices which were constructed or modified after June 11, 1973, and which burn refinery fuel gas. Therefore, the Robinson refinery is subject to the NSPS General Provisions at 40 C.F.R. §§ 60.1 - 60.17 and Subpart J Standards of Performance for Petroleum Refineries at 40 C.F.R. §§ 60.100 - 60.109

5. The Robinson refinery's SRP was modified (addition of a new Claus train) in 1992. The capacity of the SRP is 180 long tons/day. Therefore, the SRP is subject to NSPS requirements for petroleum refineries (40 C.F.R. Part 60, Subpart J), and is also required to meet the NSPS General Provision requirements (Subpart A), including 40 C.F.R. § 60.11(d).

#### Violations

6. Based on records provided by MAP (during June and November 1998 inspections), from 1994 until the present, the Robinson refinery has routinely released acid gas to the flare instead of treating it at the SRU. The attached table documents such incidents. Such repeated occurrences indicate a failure to minimize emissions in a manner consistent with good air pollution control practice and violate the requirements of 40 C.F.R. § 60.11(d).

7/30/99  
Date

  
Margaret M. Guerriero, Acting Director  
Air and Radiation Division

**CERTIFICATE OF MAILING**

I, Betty Williams, certify that I sent a Finding of Violation by Certified Mail, Return Receipt Requested, to:

Mike Ambrester  
Marathon-Ashland Petroleum, LLP  
100 Marathon Avenue  
Robinson, Illinois

I also certify that I sent copies of the Finding of Violation by first class mail to:

Ron Andes  
Marathon-Ashland Petroleum, LLC  
539 South Main Street  
Findlay, Ohio 45840-3295

David Kolaz, Chief  
Compliance and Systems Management Section  
Bureau of Air  
Illinois Environmental Protection Agency  
1021 North Grand Avenue  
Springfield, Illinois 62702

John Justice, Manager  
Region III  
Illinois Environmental Protection Agency  
Mall Street  
Collinsville, Illinois

on the 2nd day of August, 1999.

  
Betty Williams, Secretary  
AECAS, (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: P140779158