



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 20 2012

REPLY TO THE ATTENTION OF:

Jorge Acevedo
Michigan Department of Environmental Quality
Detroit District Office
3058 W. Grand Boulevard
Suite 2-300
Detroit, Michigan 48202

Dear Mr. Acevedo:

The U.S. Environmental Protection Agency has reviewed the Michigan Department of Environmental Quality's (MDEQ) proposed Renewal Operating Permit MI-ROP-A9831-20XX for Marathon Petroleum Company LP. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments.

1. The following permit terms do not have the underlying original and authority as required. 40 CFR 70.6(a)(1)(i) states, "The permit shall specify and reference the origin of and authority for each term or condition and identify any difference in form as compared to the applicable requirement upon which the term or condition is based."

Page 42, condition 6
Page 202, condition 28

2. The draft operating permit references consent decree 01-40119 and Michigan permit 175-06 on certain permit conditions. Michigan permit 175-06 was issued to incorporate the consent decree requirements into a federally enforceable document. The draft permit states that those permit conditions that only have the consent decree as its origin and authority will expire upon the termination of the consent decree. EPA recommends that these specific permit conditions that only cite the consent decree would continue past the expiration of the consent decree, which currently has no expiration date. Specifically, the following permit terms have the consent decree listed only as the underlying origin and authority:

Page 100, condition 8; The permittee shall monitor and keep records of the Nitrogen Oxides emissions from the crude and vacuum heater stack (SV04-H1-05-H1).

Page 202, condition 27; Permittee shall comply with the applicable requirements of 40 CFR 61, Subpart FF, National Emission Standards for Benzene Waste Operations, as specified in paragraphs 18 and 19 of Consent Decree and any revisions thereto.

Page 202, condition 29; Permittee shall ensure that controls are on all subject components of the individual drain system that are located at the Detroit Light Products Terminal and are in compliance as follows:

- a. The Truck Loading Terminal area aqueous benzene waste shall be routed through a system controlled pursuant to the requirements of 40 CFR 61, Subpart FF.
3. MDEQ has included on its webpage for public comment the public notice, staff report, draft permit, and various plans, such as the operation maintenance and monitoring plan and start up shut down and malfunction abatement plan. We encourage MDEQ to make available to the public all of the various other plans referenced in the draft permit.

We appreciate the opportunity to provide comments on this draft permit. Please feel free to contact me or Constantine Blathras, of my staff, at (312) 886-0671 if you have any questions.

Sincerely,



Genevieve Damico
Chief
Air Permits Section