



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

NOV 29 2011

REPLY TO THE ATTENTION OF

Mary Ann Dolehanty  
Supervisor  
Permits Section  
Air Quality Division  
Michigan Department of Environmental Quality  
PO Box 30260  
Lansing, Michigan 48909-7760

Dear Ms. Dolehanty:

The U.S. Environmental Protection Agency reviewed the proposed preconstruction minor New Source Review permits for Marathon Petroleum, located in Detroit, Michigan. Our comments on permit numbers 197-10A and 63-08C are as follows:

Permit 197-10A:

- 1) Condition IV.3. for emission unit EU\_Asphalt requires the carbon adsorption system to control emissions with at least a 45% capture efficiency. The applicable limit in condition I. requires the emission unit to keep volatile organic compounds (VOC) emissions to less than 9.8 tons per year. Is the 45% minimum control required sufficient to keep emissions to less than 9.8 tons per year? The record must contain an analysis demonstrating the level of control needed to restrict emissions to 9.8 tons per year.
- 2) Although monitoring in section VI. includes a requirement "to calculate the VOC emission rate from EU\_Asphalt monthly", it is not clear how the monitoring scheme, which appears to rely on a minimum capture efficiency by the carbon adsorption system, will assure compliance with the applicable limit. The monitoring requirement in the permit states that the method the facility will use is "a method acceptable to the AQD District Supervisor." The permit is not clear how the carbon adsorption efficiency will be monitored to assure the minimum level of efficiency, does not specify the frequency of monitoring, and is not clear on how the VOC emission rates will be calculated. Please explain how the monitoring requirements assure compliance with the VOC emission rates.

Permit 63-08C:

- 1) Permit 63-08C does not specify/quantify whether any emissions of particulate matter with a diameter less than 2.5 microns (PM2.5) will be emitted from the newer and

modified units and uses particulate matter with a diameter of less than 10 microns (PM10) as a surrogate for PM2.5. However, PM10 is no longer acceptable as a surrogate for PM2.5 and direct PM2.5 emissions must be quantified to determine whether emissions from the current project exceed the 10 tons per year significance threshold. Please revise the permit and technical support document to quantify direct PM2.5 emissions and to assess whether the major source threshold is triggered with regard to the latest 63-08C project.

- 2) The application, dated October 26, 2011, and provided by Michigan Department of Environmental Quality, states that many of the current units that are proposed to be modified will result in a decrease in emissions simply due to "monitoring" of flanges and connectors. However, there is no further explanation on how increasing monitoring will result in a decrease in emissions. Please provide this explanation in order to properly quantify this proposed emissions decrease.

We provide these comments to help ensure that the project meets all federal requirements, that the permit provides all necessary information so that it is readily accessible to the public, and that the record provides adequate support for the permit decision.

We look forward to working with you to address all of our comments. If you have any further questions, please feel free to contact Danny Marcus, of my staff, at (312) 353-8781.

Sincerely,



Genevieve Damico  
Chief  
Air Permits Section