



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

December 23, 2020

Ms. Kelly Hedges
Environmental Supervisor
Marathon Petroleum Company LP
P. O. Box AC
Garyville, LA 70051

Sent via email: kmhedges@marathonpetroleum.com

Re: Alternative Monitoring Plan (AMP) – New Source Performance Standards (NSPS) Subpart Ja – Span Gas Concentration and High Range Validation Standards for Hydrogen Sulfide (H₂S) Continuous Emission Monitoring System (CEMS) at Marathon Petroleum Company LP (MPC) Garyville Refinery, Garyville, Louisiana.

Dear Ms. Hedges:

This letter is in response to your Alternative Monitoring Plan (AMP) request dated September 17, 2020 and updated October 29, 2020, regarding the concentration of span gas used to check daily calibration drift and for the validation standards used during continuous emission monitoring system (CEMS) audits under NSPS Subpart Ja. Based upon the information provided, the United States Environmental Protection Agency (EPA) conditionally approves your request, as explained below.

Under NSPS Subpart Ja, the CEMS for South Flare Stack 59-1401 (EQT 0160), North Flare Stack 59-1451 (EQT 0162), North Ground Flare 259-1401 (EQT 0282) and South Ground Flare 259-1402 (EQT 0284) at Garyville Refinery are subject to the compliance requirements of 40 C.F.R. § 60.107a(e), sulfur monitoring for assessing root cause analysis thresholds for affected flares. According to 40 C.F.R. § 60.13(d)(1), CEMS calibration drift checks must be conducted daily for the zero level (or a low value of 0-20 percent of span value) and span range (50-100 percent of span value). Additionally, quarterly CEMS cylinder gas audits (CGA) and relative accuracy test audits (RATA) must be conducted, which require the analyzer to be challenged at low (20-30 percent of span value) and high (50-60 percent of span value) level concentrations.

MPC has installed ThermoFisher Scientific SOLA iQ sulfur analyzers on each of the four flares to continuously analyze and record hydrogen sulfide (H₂S) concentration. ThermoFisher Scientific has certified the linearity of the SOLA iQ analyzer over the range of sulfur concentrations of 0-60 percent. Therefore, to eliminate significant safety concerns associated with the handling, transportation, and storage of materials containing extremely high concentrations of H₂S, MPC proposes using reduced calibration gas concentrations for the daily span check and the validation standard for CGAs and RATAs, while following all other monitoring requirements.

Based on the process and analyzer information submitted, EPA conditionally approves your request to reduce the concentrations of the calibration gas and validation standards on the CEMS for the

four flares, provided that all other requirements of the monitoring procedures of NSPS Subpart Ja for H₂S and total reduced sulfur (TRS) are followed.

The reduced H₂S calibration gas concentrations are approved as follows:

Daily Calibration	Zero Check: 0 - 900 ppmv Span: 2250 – 3150 ppmv
Quarterly CGAs and RATA	Low Span: 900 - 1350 ppmv Low Span: 2250 - 2700 ppmv High Span: 2,500 - 3,000 ppmv

Additionally, MPC shall conduct linearity analyses on the ThermoFisher Scientific SOLA iQ analyzers once every three years to demonstrate the detectors' linearity across the entire range of expected sulfur concentrations. The analysis must include four test gases in the following nominal ranges: zero, 5-20 percent, 40-60 percent, and 80-100 percent of maximum anticipated sulfur concentration. Target acceptance criteria would be results within 5 percent of span that is based on maximum anticipated sulfur concentration. A report of the linearity analysis shall be submitted to EPA Region 6 and the Louisiana Department of Environmental Quality (LDEQ).

This conditional approval is site specific for the South Flare Stack 59-1401 (EQT 0160), North Flare Stack 59-1451 (EQT 0162), North Ground Flare 259-1401 (EQT 0282), and South Ground Flare 259-1402 (EQT 0284) at the Garyville Refinery. If refinery operations change such that the sulfur content or H₂S concentration range of the fuel gas vent stream to the four flares changes from representations made in your request, then MPC must document the change(s) and submit a new AMP request. This approval should also be incorporated into the facility's new source review (NSR) and Title V permits for federal enforceability. If you have any questions or concerns about this conditional approval, please contact Prince Nfodzo of my staff at (214) 665-7491 or Nfodzo.prince@epa.gov.

Sincerely,

STEVEN
THOMPSON

Digitally signed by STEVEN THOMPSON
DN: c=US, ou=U.S. Government, ou=Environmental
Protection Agency, cn=STEVEN THOMPSON,
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Date: 2020.12.23 11:10:36 -0600

Steve Thompson
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