

February 13, 2005

James M. Nelson
Division Manager
Marathon Ashland Petroleum LLC
Michigan Refining Division
1300 South Fort Street
Detroit, MI 48217-1294

Re: CEM Installation Exemption Petition, NO_x Budget Source, Marathon
Ashland Petroleum, LLC - Detroit Michigan Refinery (ORIS 880029).

Dear Mr. Nelson:

EPA has reviewed your February 20, 2003 petition under §75.66(a) in which Marathon Ashland Petroleum LLC (MAP) requested an exemption from the installation and certification of a continuous emission monitoring system (CEMS) for its existing CO Boiler located at its Detroit, Michigan Refinery (ORIS 880029). The CO Boiler will be permanently shut down prior to May 31, 2004. The CO boiler is a NO_x Budget unit subject to the NO_x Budget Trading Program under the NO_x State Implementation Plan (SIP) Call.

MAP requested: to exempt the CO Boiler (Unit EU27-COBOILER) located at its Detroit, Michigan Refinery from the May 2003 CEMS installation and reporting mandate and the May 2004 NO_x compliance allotment period. MAP will shut down the CO Boiler by May 31, 2004 as required by the Permit to Install 67-02, which was issued by the Michigan Department of Environmental Quality on March 28, 2003.

EPA approves MAP's request to exempt the CO Boiler from the May 1, 2003 deadline for CEMS installation and from the May 31, 2004 NO_x compliance allotment period.

Background

MAP's Detroit, Michigan Refinery operates one steam generating boiler commonly referred to as a CO boiler (Unit EU27-COBOILER). The CO boiler is being shutdown as the first step of several equipment replacement, improvement, and expansion projects planed for the refinery during the next three years. The CO Boiler is required to install and certify CEMS, in accordance with 40 CFR Part 75, to measure NO_x emissions from the CO Boiler by May 1, 2003. The requirement to hold allowances at least equal to the CO Boiler's NO_x emissions begins May 31, 2004.

MAP has received a Permit to Install (#67-02) from the Michigan Department of Environmental Quality, Air Quality Division on March 28, 2003. This Permit to Install is for the construction of a new gas fired boiler, not subject to the NO_x Budget Trading Program, which will replace the existing CO boiler. The Permit to Install has a special provision which requires the permanent shut down of the existing CO boiler prior to May 30, 2004.

EPA's Determination

EPA finds that, because MAP has agreed to enforceable conditions to shut down their existing CO Boiler (Unit EU27-COBOILER) prior to May 30, 2004, there is no purpose in requiring installation and certification of CEMS by the commencement of the 2003 ozone season. Consequently, EPA approves MAP's request to exempt the CO boiler from the May 1, 2003 deadline for CEMS installation and from the May 31, 2004 NO_x compliance allotment period.

EPA's determination in this letter relies on the accuracy and completeness of the information provided by Marathon Ashland Petroleum, LLC in the February 24, 2003 petition and subsequent supporting information, and can be appealed under Part 78. If you have any questions or concerns about this determination, please contact Manuel J. Oliva at (202) 564-0162.

Sincerely,

/s/

Samuel Napolitano, Acting Director
Clean Air Markets Division

cc: Thomas Skinner, EPA Region V
G. Vinson Hellwig, MDEQ-AQD
Teresa Seidel, MDEQ-AQD
Louis Nichols, EPA CAMD
Manuel J. Oliva, EPA CAMD