



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Marathon Pipeline, Griffith, Indiana

FROM: David Sutlin, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Supervisor
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: Marathon Pipeline, LLC

Facility Location: 1900 West Avenue H, Griffith, Indiana 46319

Date of Inspection: August 21, 2024

EPA Inspector(s):

1. David Sutlin, Environmental Engineer
2. Nicholas Bobbs, Environmental Engineer

Other Attendees:

1. Tom Hobson, Area Manager, Marathon Pipeline
2. R. Brian Knipper, Project Coordinator, Marathon Pipeline
3. Nicholas Raab, Operations Supervisor, Marathon Pipeline
4. Kevin Swartzell, Air Coordinator, Marathon Pipeline (by phone)
5. Peter Thomas, Environmental Field Support, Marathon Pipeline (by phone)
6. Ramelito Biscocho, Inspector, IDEM
7. Clifford Yukawa, Environmental Manager 2, IDEM

Contact Email Address: kmswartzell@marathonpetroleum.com

Purpose of Inspection: Conduct LEL (Lower Explosive Limit) monitoring to check for potential leaks in the facility's gasoline storage tanks and assess compliance with the National Emission Standards for

Facility Name: Marathon Pipeline, LLC
Facility Location: 1900 West Avenue H, Griffith, Indiana 46319
Date of Inspection: September 25, 2024

Hazardous Air Pollutants, Subpart BBBBBB – Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities (NESHAP Subpart BBBBBB)

Facility Type: Gasoline Distribution Bulk Terminal

Regulations Central to Inspection: NESHAP Subpart BBBBBB, including the obligation to control volatile organic compound (VOC) emissions from internal and external floating roof tanks (IFR and EFR tanks); in 2024, this rule was revised to include a limit of 25 percent of LEL as gasoline for the vapor space above the IFR; gasoline tanks constructed or reconstructed on or before June 10, 2022 must comply with this limit by May 8, 2027.

Arrival Time: 9:00 AM

Departure Time: 3:45 PM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Small Business Resource Information Sheet not provided. Reason: not a small business
- ☒ Provided CBI warning to facility

The following information was obtained verbally from facility personnel unless otherwise noted.

Process Description:

This facility currently stores various blends of gasoline in 11 main tanks, diesel in two tanks, kerosine in one tank, and transmix in one tank. All liquid organic products enter and exit the facility via pipeline. Each gasoline tank has both an internal floating roof (IFR) and either an original fixed roof or retrofit geodesic dome roof. For gasoline tanks, the facility conducts semi-annual through-the-hatch inspections of the IFRs and third party “on the roof” inspections every 10 years.

Staff Interview:

When conducting through-the-hatch inspections of the floating roof, facility personnel have a 360-degree view of the roof on those tanks retrofitted with a geodesic dome but only a partial view for tanks with fixed roofs. The facility also conducts their own LEL monitoring of the gasoline tanks by lowering the meter onto the floating roof and using a meter that is set to alarm at 10% of the LEL.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

EPA used a FLIR camera to screen tanks for possible VOC emissions leaks. Based in part on these observations, EPA conducted LEL monitoring at 5 of the tanks.

Tank 80-12 features a ladder (“negotiator”) that penetrates the floating roof. The roof penetration is partially sealed with a small gap of approximately 0.25”. One side of the ladder consists of a slotted gauge poll to allow liquid to enter the poll. A floating device which staff referred to as a “baffle” inside the poll is intended to seal off the liquid at the level of the floating roof.

Photos and/or Videos: were taken during the inspection and are listed in Appendix A.

Field Measurements: were taken during this inspection and are listed in Appendix B.

EPA took LEL measurements at 5 tanks by lowering a tube connected to a four-gas meter to within approximately one foot from the internal floating roof. For 3 of the 5 tanks, the LEL measurements exceeded 25% of LEL as gasoline, as a 5-minute average.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- Through-the-hatch and “on-the-roof” inspection reports for the 3 tanks where readings exceeded 25% of LEL
- Descriptions of how through-the-hatch and “on-the-roof” inspections are performed
- Annual emission calculations for past 2 years

Compliance Assistance: EPA discussed the 2024 addition of LEL monitoring requirements to the NESHAP Subpart BBBBBB.

Concerns: EPA expressed concern with the readings that exceeded 25% of LEL as gasoline and requested that the facility update EPA regarding any follow-up investigations.

DIGITAL SIGNATURES

Report Author: DAVID SUTLIN  Digitally signed by DAVID SUTLIN
Date: 2024.10.18 10:15:07 -05'00'

Section Supervisor: NATALIE SCHULZ  Digitally signed by NATALIE SCHULZ
Date: 2024.10.18 10:25:05 -05'00' For Brian Dickens

Facility Name: Marathon Pipeline, LLC
Facility Location: 1900 West Avenue H, Griffith, Indiana 46319
Date of Inspection: September 25, 2024

APPENDICES

1. Appendix A: Digital Image Log and Digital Video Log
2. Appendix B: Field Measurement Data

Facility Name: Marathon Pipeline, LLC
Facility Location: 1900 West Avenue H, Griffith, Indiana 46319
Date of Inspection: September 25, 2024

APPENDIX A: DIGITAL IMAGE LOG AND DIGITAL VIDEO LOG

Inspector Name: David Sutlin

Archival Record Location: *Region 5 Electronic Record Center: \Enf_Marathon Pipe Line
Griffith_IN_24\Enf_Marathon Pipe Line Griffith_IN_24_Inspection\FLIR Videos*

Image Number	File Name	Date and Time (incl. Time zone and DST)	Latitude and Longitude	Description of Image
1	FLIR0304.mp4	8/21/2024 10:35		FLIR video of tank 80-12 venting emissions
2	FLIR0305.mp4	8/21/2024 10:35		FLIR video of tank 80-12 venting emissions
3	FLIR0306.mp4	8/21/2024 11:49		FLIR video of tank 268-11 venting emissions
4	FLIR0307.mp4	8/21/2024 14:46		FLIR video of tank 120-4 venting emissions

APPENDIX B: FIELD MEASUREMENT DATA

EPA conducted LEL monitoring of 5 product storage tanks at the MPLX facility. EPA used a Honeywell multi gas meter, model #QRAE3, connected to a sampling line that was lowered through an access hatch to within 1 foot of the internal floating roof.

EPA calibrated the QRAE3 in the morning prior to the inspection, using ambient air and a 25,000 ppm methane calibration gas standard, which is equivalent to 50% of LEL for methane. Following are the calibration check results:

Table 1: Instrument Calibration Check		
Calibration Gas	Time of Reading	Reading (% of LEL as methane)
25000 ppm methane (50% of LEL)	7:45 AM	51%
25000 ppm methane (50% of LEL)	2:41 PM	48%
25000 ppm methane (50% of LEL)	3:09 PM	48%

Following is a summary of the LEL monitoring results:

Table 2: Results			
Tank ID	Time of Reading	Results	Comments
80-12	10:56 AM – 11:12 AM	Maximum 5-min average = 52.36% of LEL as gasoline	Additional readings taken from high tank alarm port resulted in 0% LEL over 5 minutes
268-11	11:47 AM – 11:55 AM	Maximum 5-min average = 19.55% of LEL as gasoline	
217-7	12:20 PM – 12:24 PM	Maximum 5-min average = 13.94% of LEL as gasoline	
120-4	2:13 PM – 2:29 PM	Maximum 5-min average = 42.67% of LEL as gasoline	Readings taken through access hatch next to high tank alarm port
80-9	2:54 PM – 3:05 PM	Maximum 5-min average = 31.68% of LEL as gasoline	