

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF: )  
)  
PETITION OF MARATHON PETROLEUM ) AS 2024 -003  
COMPANY LP FOR AN ADJUSTED ) (Adjusted Standard – Air)  
STANDARD FROM 35 ILL. ADM. CODE )  
PART 201 AND SECTION 216.361 )

**NOTICE OF FILING**

TO: Mr. Don A. Brown  
Clerk of the Board  
Illinois Pollution Control Board  
60 E. Van Buren Street,  
Suite 630  
Chicago, Illinois 60605  
[don.brown@illinois.gov](mailto:don.brown@illinois.gov)

Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
PO Box 19276  
Springfield, Illinois 62794-9276  
[epa.dlc@illinois.gov](mailto:epa.dlc@illinois.gov)

**VIA ELECTRONIC MAIL**

**(SEE PERSONS ON ATTACHED SERVICE LIST)**

PLEASE TAKE NOTICE that I have today filed, with the Office of the Clerk of the Illinois Pollution Control Board, the **PROOF OF NOTICE OF PETITION**, on behalf Marathon Petroleum Company LP, copies of which are hereby served upon you.

Respectfully submitted,

MARATHON PETROLEUM COMPANY LP,

Dated: August 31, 2023

By: /s/ Melissa S. Brown  
One of Its Attorneys

Melissa S. Brown  
Andrea Quade  
HEPLERBROOM, LLC  
4340 Acer Grove Drive  
Springfield, Illinois 62711  
[Melissa.Brown@heplerbroom.com](mailto:Melissa.Brown@heplerbroom.com)  
[Andrea.Quade@heplerbroom.com](mailto:Andrea.Quade@heplerbroom.com)  
Phone: (217) 528-3674

**CERTIFICATE OF SERVICE**

I, the undersigned, on oath state the following: that I have served the attached,  
**PROOF OF NOTICE OF PETITION**, via electronic mail upon:

Mr. Don A. Brown  
Clerk of the Board  
Illinois Pollution Control Board  
60 E. Van Buren Street  
Suite 630  
Chicago, Illinois 60605  
[don.brown@illinois.gov](mailto:don.brown@illinois.gov)

Dana Vetterhoffer  
Audrey L. Walling  
Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
PO Box 19276  
Springfield, Illinois 62794-9276  
[epa.dlc@illinois.gov](mailto:epa.dlc@illinois.gov)  
[dana.vetterhoffer@illinois.gov](mailto:dana.vetterhoffer@illinois.gov)  
[Audrey.L.Walling@illinois.gov](mailto:Audrey.L.Walling@illinois.gov)

That my email address is [Melissa.Brown@heplerbroom.com](mailto:Melissa.Brown@heplerbroom.com)

That the number of pages in the email transmission is 6.

That the email transmission took place before 5:00 p.m. on August 31, 2023.

Date: August 31, 2023

/s/ Melissa S. Brown  
Melissa S. Brown

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

<b>IN THE MATTER OF:</b>	)	
	)	
	)	
<b>PETITION OF MARATHON PETROLEUM</b>	)	<b>AS 24-3</b>
<b>COMPANY LP FOR AN ADJUSTED</b>	)	<b>(Adjusted Standard – Air)</b>
<b>STANDARD FROM 35 ILL. ADM. CODE</b>	)	
<b>PART 201 AND SECTION 216.361</b>	)	

**PROOF OF NOTICE OF PETITION**

Petitioner, MARATHON PETROLEUM COMPANY LP<sup>1</sup> (“Marathon”), by its attorneys, pursuant to 35 Ill. Adm. Code 104.410, hereby files its Proof of Notice of Petition. Marathon filed its Petition for an Adjusted Standard on August 14, 2023 and caused publication of notice of the filing of that petition pursuant to 35 Ill. Adm. Code 104.408 in the *Robison Daily News* on August 23, 2023. The Certificate of Publication of the *Robinson Daily News*, which is attached to this filing, certifies that a Public Notice regarding Marathon’s Petition for an Adjusted Standard was published in the *Robinson Daily News* on August 23, 2023. A copy of the Public Notice is included in the Certificate of Publication.

Respectfully submitted,

Dated: August 31, 2023

MARATHON PETROLEUM COMPANY LP,

By: /s/ Melissa Brown  
One of its Attorneys

Melissa Brown  
Andrea Quade  
HEPLERBROOM, LLC

<sup>1</sup> Simultaneous with the filing of this Proof of Notice, Marathon is filing a Motion for Correction by Interlineation, or in the Alternative, Motion to Amend Petition. In that Motion, Marathon requests that the references to Marathon’s name in the Adjusted Standard Petition documents, as well as the proceeding caption, be corrected from “Marathon Petroleum Company, LLC” to “Marathon Petroleum Company LP.” Consistent with that Motion, this Proof of Notice filing and the proceeding caption for this filing reflects Petitioner’s correct name.

4340 Acer Grove Drive  
Springfield, IL 62711

[Melissa.Brown@heplerbroom.com](mailto:Melissa.Brown@heplerbroom.com)

[Andrea.Quade@heplerbroom.com](mailto:Andrea.Quade@heplerbroom.com)

Ph. 217-528-3674

**AFFIDAVIT OF PUBLICATION**

**Robinson Daily News  
302 S Cross St  
(618) 544-2101**

I, Bailee Liston, of lawful age, being duly sworn upon oath depose and say that I am an agent of Column Software, PBC, duly appointed and authorized agent of the Publisher of Robinson Daily News, a publication that is a "legal newspaper" as that phrase is defined for the city of Robinson, for the County of Crawford, in the state of Illinois, that this affidavit is Page 1 of 2 with the full text of the sworn-to notice set forth on the pages that follow, and that the attachment hereto contains the correct copy of what was published in said legal newspaper in consecutive issues on the following dates:

**PUBLICATION DATES:**  
23 Aug 2023

**Notice ID:** IU6sDaGgeTxJLdAhcaQ  
**Notice Name:** Marathon Adjusted Standard Notice

**PUBLICATION FEE:** \$184.92

Under penalties as provided by Illinois law, the undersigned certifies that the statements set forth in this instrument are true and correct.

*Bailee Liston*

\_\_\_\_\_  
Agent

on this: 08/23/2023

**Notice of Petition by Marathon Petroleum Company LP for an Adjusted Standard before the Illinois Pollution Control Board**

On August 14, 2023, Marathon Petroleum Company LP ("Marathon") filed a petition for an adjusted standard (docket number AS 2024-003) with the Illinois Pollution Control Board ("Board"). (Marathon was inadvertently referenced as "Marathon Petroleum Company, LLC" in the petition documents.) Marathon is seeking an adjusted standard for its refinery facility located at 100 Marathon Avenue, Robinson, Illinois 62454 (Crawford County). The mailing address of Marathon Petroleum Company LP is 100 Marathon Avenue, Robinson, Illinois 62454. The adjusted standard is sought from 35 Ill. Adm. Code Part 201 and 35 Ill. Adm. Code § 216.361 as a result of the Board's recent amendments to Part 201. For the proposed adjusted standard, Marathon is seeking an alternative emission limitation in lieu of the 200 ppm corrected to 50% excess air carbon monoxide ("CO") limitation set forth in 35 Ill. Adm. Code § 216.361 during periods of startup of its fluid catalytic cracking unit ("FCCU"). The Board's recent removal of the startup, malfunction, and breakdown ("SMB") relief provisions from Part 201, in PCB R 23-18, adversely impacts Marathon's ability to comply with the CO standard in Section 216.361 during startup of the FCCU due to the technical infeasibility of the FCCU to meet the standard during periods of startup. The prior SMB provisions effectively authorized higher CO emissions from the FCCU during startup. The Marathon refinery produces petroleum-based fuel products, including gasoline, distillates, propane, anode-grade coke, aromatics, fuel-grade coke, and slurry. The FCCU is the "heart" of the refinery used to process a significant intermediate of crude oil called gasoil. The products of an FCCU are then used in several downstream process units. FCCU

startups are very complex, complicated events, and the outcome of the startups depend on the original reason the unit was shut down, as well as a multitude of other variables.

Marathon's proposed adjusted standard is as follows:

1. Pursuant to Section 28.1 of the Environmental Protection Act ("Act") (415 ILCS 5/28.1), the Board grants Marathon Petroleum Company, LLC ("Marathon") an adjusted standard from 35 Ill. Adm. Code Part 201 and 216.361, effective \_\_\_\_\_, 202\_\_\_. The adjusted standard applies to the emissions of carbon dioxide ("CO") into the atmosphere from Marathon's fluid catalytic cracking unit ("FCCU") in its petroleum refinery located at 100 Marathon Avenue, Robinson, Crawford County, Illinois ("Refinery").

2. The CO standards in 35 Ill. Adm. Code 216.361 do not apply during periods of startup of the FCCU.

3. During periods of startup, Marathon must comply with the requirements applicable to FCCUs during startup in 40 CFR 63 Subpart UUU Tables 9, 10, 14, and 41 and 40 CFR 63.1565(a)(5), 40 CFR 63.1570(c) and (f), 40 CFR 63.1572(c) and 40 CFR 63.1576(a)(2) and (d).

4. The definition for "catalytic cracking unit" in 40 CFR 63.1579 applies to this adjusted standard. The definition of "startup" in 40 CFR 63.2 applies to this adjusted standard.

(Marathon will be moving the Board to correct the typographical error in Marathon's name in the petition documents and referenced in the proposed adjusted standard language above.)

Any person may cause a public hearing to be held in the above-described adjusted standard proceeding by filing a hearing request with the Illinois Pollution Control Board within 21 days after the date of the publication of this notice. The hearing request should indicate the docket number for the

adjusted standard proceeding, as found in this notice. The hearing request must be mailed to the Clerk, Illinois Pollution Control Board, 100 W. Randolph Street, Suite 11-500, Chicago, Illinois 60601, or filed electronically through COOL, located on the Board's website ([www.ipcb.state.il.us](http://www.ipcb.state.il.us)).