



CITGO Petroleum Corporation

P.O. Box 4689
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March 31, 2025

Via electronic mail to airaction@epa.gov

U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

RE: Presidential Exemption: [New Source Performance Standards for the Synthetic Organic Chemical Manufacturing Industry and National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Synthetic Organic Chemical Manufacturing Industry (SOCMI) and Group I & II Polymers and Resins Industry]:
CITGO Lake Charles Refinery, 4401 HWY 108 S, Sulphur, LA 70663, EPA Facility Registry Service (FRS) ID: 110000597248
CITGO Corpus Christi Refinery, East Plant, 1801 Nueces Bay Blvd., Corpus Christi, TX 78407, EPA FRS ID: 110000505640
CITGO Lemont Refinery, 135th Street and New Avenue, Lemont, IL 60439, EPA FRS ID: 110000595348

To Whom It May Concern,

CITGO Petroleum Corporation (CITGO), which owns and operates three petroleum refineries in Lake Charles, Louisiana, Corpus Christi, Texas and Lemont, Illinois, requests an exemption from the compliance obligations of the New Source Performance Standards (NSPS) for the Synthetic Organic Chemical Manufacturing Industry (SOCMI) and National Emission Standards for Hazardous Air Pollutants (NESHAP) and Group I & II Polymers and Resins Industry (collectively referred to as the HON Rule).¹ We believe it is appropriate for the President to grant an exemption under Clean Air Act (CAA) Section 112(i)(4) for sources regulated by the final rule either on an individual basis or collectively for the reasons stated below. If done collectively, we request that EPA include CITGO's regulated facilities referenced above under that collective action.

We urge the Administration to consider and issue such an action based on an understanding that both: 1) "availability" for the purposes of this section refers not only to the existence of technology capable of achieving compliance with the rule, but encompasses practical challenges with the timeframes necessary to plan, procure, and install required technologies and such activity cannot occur within the current compliance timeframe; and 2) national security encompasses not only military defense applications and infrastructure, but also economic security, a perspective that has been acknowledged by the President in Executive

¹ National Emissions Standards for Hazardous Air Pollutants (NESHAP), Powering the Great American Comeback, https://www.epa.gov/system/files/documents/2025-03/neshap_powering-the-great-american-comeback_fact-sheet_2.pdf 89 Fed. Reg. 42932 (May 16, 2024).



Orders and key security agencies like the Department of Defense. Indeed, as the White House has stated regarding domestic priorities, "economic security is national security."²

CITGO's three refineries listed above are subject to some of the revised HON Rule requirements cited above. CITGO agrees with its industry peers that the revised HON Rule imposes burdensome requirements on the petrochemical industry. The industry burdens, especially in relation to ethylene oxide (EO) manufacturers, are more fully described in the separate joint coalition submission sent to EPA from associations the American Chemistry Council (ACC) and the American Fuel & Petrochemicals Manufacturers (AFPM). CITGO is a member of both ACC and AFPM, but its petroleum refineries do not have EO processes.

CITGO's petroleum refineries are potentially subject to monitoring and testing requirements associated with 1,3 butadiene. While CITGO is attempting to meet all applicable regulatory deadlines, there are technological challenges that could impede CITGO's ability to comply with the monitoring of 1, 3 butadiene per the HON Rule. If CITGO's performance of fence-line monitoring finds actionable levels of 1, 3 butadiene, it will trigger an additional regulatory requirement of "real-time" monitoring of 1,3 butadiene under the HON rule. See 40 CFR §63.184(a)(1)(ii). There is present uncertainty as to whether CITGO's current equipment is sufficiently robust to perform such real-time monitoring. Performing real-time monitoring could require an upgrade to the existing equipment, which may not be attainable before the compliance date period.³ CITGO requests sufficient time, without the threat of enforcement, for its three refineries to address any issues or challenges that arise as CITGO attempts to comply with the HON Rule, including the implementation of any necessary real-time monitoring technology.

CITGO's petroleum refineries are also potentially subject to pressure relief device (PRD) in organic HAP gas or vapor requirements as specified in 40 CFR §63.165. If CITGO is subject and required to comply with the pressure relief operating, pressure release and pressure release management requirements outlined in 40 CFR §63.165(e), CITGO will need to conduct engineering design and HAZOP studies to develop and implement solutions to meet PRD requirements. Additionally, CITGO will need to plan and schedule PRD work during a process unit outage. Conducting engineering design and HAZOP studies as well as planning and scheduling process unit outages requires ample time, which again may not be attainable for one or more of CITGO's refineries before the compliance date period.

If CITGO is unable to meet the 1,3 butadiene monitoring and/or the PRD requirements, it may be required to reduce output at one or more of its three refineries. This could lead to reduced output of gasoline and other fuels that are essential to the national economy and

² <https://www.whitehouse.gov/presidential-actions/2025/02/america-first-investment-policy/>.

³ Installing new real-time monitoring equipment requires availability of outside resources and availability of real-time monitoring equipment. Additionally, real-time monitoring equipment requires electric utilities not easily accessible throughout each of the facility's fence line or requires installation of more expensive solar panels and charging batteries, expensive gas chromatography equipment that requires routine calibrations and maintenance, and sophisticated software systems to collect and report data. Installing and maintaining new real-time monitoring equipment would require an extensive upgrade to the existing fixed passive-diffusive monitoring equipment and such an upgrade may not be attainable before the compliance date period.



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military. Indeed, the President has declared a National Energy Emergency that highlights the importance of domestic energy security as an increasingly crucial theater of global competition, reinforcing that an affordable and reliable domestic energy supply is a fundamental requirement for national and economic security. See Executive Order 14156, *Declaring a National Energy Emergency* (Jan. 20, 2025). The order notes that domestic energy infrastructure is an immediate and pressing priority for the protection of U.S. national and economic security. *Id.* It would thus further national security interests to provide CITGO with a 2-year exemption under section 112(i)(4) for its three refineries.

We believe that the Administration has already been provided with sufficient information (including prior comments and the underlying petition for reconsideration on the HON rule) to support an exemption covering all regulated facilities. We submit this letter to reaffirm CITGO's support for a collective exemption and to identify CITGO's refineries for purposes of such an exemption. We also request an individual exemption for CITGO's three refineries based on the uncertainties associated with the implementation of the 1,3 butadiene and PRD regulations.

CITGO became aware only recently of the opportunity to submit regarding the exemption issues discussed in this letter, and it has attempted to respond and supply relevant and responsive information based on its understanding of the process. CITGO reserves the right to provide additional information and/or documentation supporting this request for exemption, including information/documentation on costs and availability of the technologies for compliance.

Please feel free to contact the undersigned or Adrian Araiza, Corporate Manager, Environmental Services, at ajaraiza@citgo.com or (832) 486-4903 if you need additional information regarding this request.

With best regards,

A handwritten signature in black ink, appearing to read "Ann Al-Bahish".

Ann Al-Bahish
CITGO Petroleum Corporation

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