ILLINOIS POLLUTION CONTROL BOARD
December 17, 2025

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| IN THE MATTER OF: | ) | |
| | ) | |
| PETITION OF CITGO PETROLEUM | ) | AS 26-1 |
| CORPORATION FOR AN ADJUSTED | ) | (Adjusted Standard – Air) |
| STANDARD FROM 35 ILL. ADM. CODE | ) | |
| 216.121 | ) | |

**AMENDED HEARING OFFICER ORDER**

This amended hearing officer order corrects typographical errors in the questions attached to the previous hearing officer order issued in the above-captioned adjusted standard petition.[1] To assist the Board in its consideration of this petition, Citgo is directed to provide in writing its responses to the attached questions. The responses are due by January 7, 2026.

IT IS SO ORDERED.

Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
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[1] The previous hearing officer order was incorrectly dated December 17, 2025, but was issued on December 16, 2025.

**AS 26-1: PETITION OF CITGO PETROLEUM CORPORATION FOR AN ADJUSTED STANDARD FROM 35 ILL. ADM. CODE 216.121**

**Board Questions Directed to CITGO Petroleum Corporation**

CITGO Petroleum Corporation (CITGO) requests an adjusted standard that stems from Board Rulemaking R23-18. In that rulemaking, the Board adopted rules that removed provisions that addressed emission limit exceedances during a start-up, malfunction, or breakdown (SMB) event under Parts 201, 202, and 212. In the Matter of: Amendments to 35 Ill. Adm. Code Parts 201, 202, and 212, R23-18 (July 20, 2023). After final adoption of the rules in the main docket, the Board opened a sub-docket, R23-18(A), to consider certain site-specific proposals. Under this sub-docket, the American Petroleum Institute (API) filed a proposal to amend the carbon monoxide (CO) standards applicable to petroleum and petroleum processes under Part 216 (API Prop.) due to the Board's removal of SMB provisions in Part 201. *See* In the Matter of: Amendments to 35 Ill. Adm. Code Parts 201, 202, and 212, R23-18(A); *see also* API Prop. at 2.

API's proposal included alternative emission limitations (AELs) for CITGO's Lemont Refinery as one of the refineries impacted by the amendments in R23-18. API Prop. at 2. However, the Board did not adopt the AELS for the CITGO refinery. In the Matter of: Amendments to 35 Ill. Adm. Code Parts 201, 202, and 212, R23-18(A) (Aug. 22, 2024) at 8. In turn, CITGO filed a petition for adjusted standard from 35 Ill. Adm. Code 216.121 seeking AELs like the relief requested in the API's Proposal (Pet.). Pet. at P-7. In R23-18(A) proceedings, IEPA raised concerns regarding AELs proposed for CITGO and requested more information. R23-18(A), PC 5 at 15. Based on IEPA's concerns in R23-18(A), the Board directs CITGO to answer the following questions.

1. Please provide a description of CITGO's FCCU (fluidized catalytic convertor unit) operation with respect to "full burn unit" and "partial burn unit" as described on page 15 of the TSD from API's Proposal. If CITGO's FCCU typically starts in full burn mode:

    a. Please provide a description of any operating scenario in which the FCCU starts in full burn mode that is different from routine operation and involves CO concentrations between 10 and 100 ppm.

    b. Does CITGO consider a "full burn unit" to correspond to the language in 35 III. Adm. Code 216.361(b) that "any existing petroleum or petrochemical process using catalyst regenerators for fluidized catalytic convertors equipped for in situ combustion of carbon monoxide"? If so, please explain why CITGO:

        i. has not elected to comply with 35 III. Adm. Code 216.361(b) instead of 35 III. Adm. Code 216.361(a) during startup?

        ii. has not included 35 III. Adm. Code 216.361(b) in the CAAP Permit provisions applicable to the FCCU?

2. Please clarify whether CITGO considers “1% oxygen waste stream concentration requirement under 40 CFR § 63.1565(a)(5)(ii) to be synonymous with the definition of ‘full burn unit’” as described on page 15 of the TSD.

3. For each boiler, please provide an analysis of whether the worst-case scenario (for statistical and maximum actual worst case) occurred during startup, hot standby events, FCCU Regenerator breakdown, boiler trips, or refractory repair events.