From: Nikki Comber
To: Brown, Don
Subject: [External] CITGO Lemont Refinery – Petition for Adjusted Standard (AS 2026-001)
Date: Tuesday, June 23, 2026 10:37:59 AM

To the Clerk of the Board and Members of the Illinois Pollution Control Board:
My name is Nikki Comber, and I am writing as both a resident of the Lemont/Romeoville community, as well as a licensed environmental engineer. I respectfully submit the following comments for inclusion in the record regarding CITGO Petroleum Corporation's petition for an adjusted standard from 35 Ill. Adm. Code 216.121 (AS 2026-001).

From a technical perspective, I understand that combustion systems experience inherently unstable conditions during startup and shutdown. Lower temperatures, incomplete mixing, and limited residence time can result in temporary increases in carbon monoxide even when equipment is being operated properly. I also acknowledge that the Illinois EPA and U.S. EPA have reviewed the technical support and dispersion modeling and concluded that the proposed adjusted standard is unlikely to result in violations of National Ambient Air Quality Standards or pose a significant health risk to the surrounding community.

However, as both an environmental engineer and a member of this community, my focus is on ensuring that these conclusions remain valid in real-world operation over time through clear definitions, proper documentation, and effective oversight. Decisions related to this petition should prioritize the health of the community that supports CITGO, as well as the environment in which we live.

The proposed adjusted standard relies on the federal work practice requirements in 40 CFR 63 Subpart DDDDD, including the definition of "startup," which limits startup to the period ending when useful thermal energy is first supplied, or no later than four hours afterward under the alternative definition. Subpart DDDDD also requires continuous operation of monitoring systems, strict use of clean fuels during startup, timely engagement of control devices, and detailed recordkeeping of startup timing, fuel use, operating parameters, deviations, and corrective actions.

In reviewing the historical data, two events illustrate why proper application of these requirements is important:

- The highest emission event occurred on December 24, 2020 with a peak carbon monoxide concentration of about 4,618 ppmvd @ 50% excess air (1-hr avg.) for 4 hours.

  This represents approximately a 2,200% increase above the current 200 ppm standard. Although I understand that this concentration is measured at the stack and is not representative of the community exposure, the magnitude of this event raises questions about emissions at the fence line. Although real-time community notification is not a regulatory requirement, there is strong interest

within the community for timely access to monitoring information during such events so residents can make informed decisions for their health.

- Longest exceedance during startup occurred for 175.77 hours with 690.6 ppmvd, 1-hr avg on October 17, 2023.

  A startup duration of more than 7 days raises a reasonable question as to whether it is appropriate for elevated emissions to persist at this level for an extended period. Given that Subpart DDDDD does not allow open-ended startup periods, these data points underscore the importance of ensuring that extended periods of elevated emissions are clearly evaluated and distinguished from startup, normal operation, or malfunction, and that existing recordkeeping and reporting requirements are applied as intended.

While some higher emissions during startup may be unavoidable, the impacts are felt by the surrounding community and environment. CITGO should remain responsible for proper maintenance and for preventing equipment issues that lead to long or repeated emission spikes. The community is concerned that approving this petition could allow similar emission events to occur without clear enforcement or accountability by CITGO.

Because the proposed adjusted standard replaces a numerical emission limit with work practice requirements during startup and shutdown, it is important that strong safeguards remain in place to ensure accountability and transparency. In particular, I respectfully encourage the Board to ensure that any approval includes the following safeguards:

- Clear and enforceable application of the federal startup and shutdown definitions and requirements.
- Continuous operation of emissions monitoring during startup and shutdown and retention of data.
- Provide real-time or near real-time fence-line air monitoring data to the public during significant startup events, with notification to the community when sustained emission spikes occur.
- Transparent tracking and reporting of the frequency and cumulative duration of startup events.
- Verification that emissions are minimized to the lowest achievable levels consistent with safe operation.
- Conditions that the assumptions for underlying health-based modeling remain valid over time.

Because this request allows flexibility during startup and shutdown instead of a fixed emission limit, it is important to make sure those periods are clearly defined, carefully tracked, and closely reviewed. Startup should be temporary and limited, not something that can last for days without explanation. Keeping clear records and monitoring data helps ensure that higher emissions during startup stay rare, short,

and well-controlled.

In closing, I understand that the request is based on real operating challenges and may be reasonable from a technical standpoint. At the same time, clear oversight and transparency are essential so the community can be confident that startup periods are handled responsibly and that air quality protections remain strong over time.

Thank you for your consideration and for your continued work to protect public health and maintain community trust.

Respectfully,

Nikki Comber, PE
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