

Electronic Filing: Received, Clerk's Office 06/26/2026 P.C. #146

From: [Michael Cole](#)
To: [Brown, Don](#)
Subject: [External] We oppose CASE# AS 2026-001
Date: Friday, June 26, 2026 10:53:58 AM

Mr. Brown,

I am writing to formally express my opposition to CITGO Petroleum Corporation's request for an Adjusted Standard in AS 26-1.

After reviewing CITGO's responses to the Illinois Pollution Control Board's questions, I remain concerned that granting this adjusted standard would weaken existing protections and create unnecessary regulatory inconsistency. While CITGO argues that its request is narrowly tailored, the filing repeatedly attempts to distance this proceeding from the related FCCU rulemaking, despite clear overlap in operational context and emissions considerations.

My concerns include:

- The adjusted standard would allow higher emissions from boilers and process heaters during startup and shutdown events, which are precisely the periods when emissions are least controlled.
- CITGO's worst-case emissions analysis relies heavily on internal assumptions and selectively framed data, without independent verification.
- The company's argument that FCCU-related issues are irrelevant overlooks the cumulative impact of emissions from all refinery units operating on the same site.
- Granting this request could set a precedent for other facilities to seek similar exemptions, undermining the intent of 35 Ill. Adm. Code 216.121.

For these reasons, I respectfully urge the Board to deny CITGO's request and maintain the existing emissions standard.

Thank you for your consideration.

Sincerely,

Michael Cole – Concerned resident.