

From: [Nancy Jurgilas](#)  
To: [Brown, Don](#); [Halloran, Brad](#)  
Subject: [External] IN THE MATTER OF: CITGO PETROLEUM CORPORATION – AS Docket number 2026-001  
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**Don and Brad,**

**IN THE MATTER OF: CITGO PETROLEUM CORPORATION – AS Docket  
number 2026-001**

# **Comments of Residents Regarding Public Health Protections and Reliance on Modeling**

Residents respectfully submit these comments regarding the proposed adjusted standard. Our concern is whether reliance on emissions modeling and historical compliance data alone provides sufficient protection for families, children, and other sensitive populations living near the CITGO Lemont refinery.

## **1. Illinois History Shows the Limits of Predictive Modeling**

Illinois has experienced major environmental health failures, including the Sterigenics facility in Willowbrook and contamination associated with Lockformer operations near Chicago Heights.

These cases demonstrate that:

- Regulatory decisions relied heavily on modeled emissions and assumptions.
- Community exposure risks were not fully recognized until years later.
- Significant regulatory action occurred only after contamination or elevated health risks became evident.

These examples show that regulatory compliance and predictive modeling do not always reflect real-world community exposure.

## **2. Modeling Alone Cannot Capture Real-World Conditions**

The petition relies primarily on emissions modeling and historical operating data. While modeling is an important tool, it is based on assumptions that cannot account for every operating condition.

Residents are concerned that:

- Startup, shutdown, and malfunction events may create short-term emission spikes not reflected in average modeling.

Multiple nearby industrial facilities may contribute to cumulative exposures that are not fully evaluated.

- Children, older adults, and individuals with respiratory conditions may be affected by short-duration exposure events even when long-term averages meet standards.

### **3. Past Compliance Does Not Guarantee Future Safety**

The absence of previous exceedances does not eliminate the possibility of future events.

Industrial operations change over time through equipment modifications, maintenance, and unexpected operational upsets. The Board should evaluate reasonably foreseeable worst-case scenarios—not only historical operating conditions.

### **4. A Precautionary Public Health Approach Is Appropriate**

Given Illinois' experience with Sterigenics and Lockformer, residents respectfully request that the Board not rely solely on predictive modeling where uncertainty remains.

Additional safeguards are appropriate because:

- Residential neighborhoods are located nearby.
- Children and other sensitive populations may be affected.
- Emissions can vary significantly during non-routine operations.

### **5. Requested Safeguards**

If the Board grants the adjusted standard, residents respectfully request that it include enforceable protections, including:

- Continuous fence-line air monitoring with publicly available data.
- Public notification of startup, shutdown, malfunction, and excess emission events.
- Independent third-party verification of emissions modeling.
- Evaluation of cumulative impacts from nearby industrial facilities.
- Automatic Board review if monitored emissions differ significantly from modeled predictions.
- Periodic reassessment of the adjusted standard to ensure continued public health protection.

## **Conclusion**

Residents do not oppose industrial activity. Rather, they seek assurance that regulatory flexibility will not come at the expense of community health.

Illinois' experience with Sterigenics and Lockformer demonstrates that environmental risks are not always identified through predictive modeling alone. For that reason, any adjusted standard should include enforceable, transparent, and verifiable safeguards that protect the community under real-world operating conditions.

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**Respectfully submitted,**

*Nancy L. Jurgilas*