

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	
PETITION OF CITGO PETROLEUM)	AS 2026 - 001
CORPORATION FOR AN ADJUSTED)	(Adjusted Standard – Air)
STANDARD FROM 35 ILL. ADM. CODE)	
SECTION 216.121)	

NOTICE OF FILING

TO: Mr. Don A. Brown
Clerk of the Board
Illinois Pollution Control Board
60 E. Van Buren Street, Suite 630
Chicago, Illinois 60605
don.brown@illinois.gov

Brad Halloran
Hearing Officer
Illinois Pollution Control Board
60 E. Van Buren Street, Suite 630
Chicago, Illinois 60605
brad.halloran@illinois.gov

VIA ELECTRONIC MAIL

(SEE PERSONS ON ATTACHED SERVICE LIST)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board, **CITGO PETROLEUM CORPORATION'S RESPONSE TO RECOMMENDATION**, copies of which are hereby served upon you.

Respectfully submitted,

CITGO PETROLEUM CORPORATION

Dated: November 4, 2025

By: /s/ Melissa S. Brown
One of Its Attorneys

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CERTIFICATE OF SERVICE

I, the undersigned, on oath state the following: That I have served the attached **CITGO PETROLEUM CORPORATION'S RESPONSE TO RECOMMENDATION**, via electronic mail upon:

Don Brown
Clerk of the Board
Illinois Pollution Board
60 E Van Buren Street, Suite 630
Chicago, Illinois 60605
don.brown@illinois.gov

Brad Halloran
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That my email address is Melissa.Brown@heplerbroom.com.

That the number of pages in the email transmission is 6.

That I have sent the email transmission on November 4, 2025.

Date: November 4, 2025

/s/ Melissa S. Brown
Melissa Brown

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

RESPONSE TO RECOMMENDATION

Petitioner, CITGO Petroleum Corporation (“CITGO”), by and through its undersigned counsel and pursuant to 415 ILCS 5/28.1 and 35 Ill. Adm. Code 104.416(d), hereby files its Response to the Illinois Environmental Protection Agency’s (“Illinois EPA”) Recommendation. In support of this filing, CITGO states as follows:

1. On September 10, 2025, CITGO filed its Petition for an Adjusted Standard with the Illinois Pollution Control Board (“Board”). Adjusted Standard Petition of CITGO Petroleum Corporation, AS 26-1 (Sept. 10. 2025).

2. In the Petition, CITGO requests an alternative to the existing requirements for carbon monoxide (“CO”) applicable to fuel combustion emission sources in 35 Ill. Adm. Code 216.121 for certain fuel combustion emission sources at CITGO’s Lemont Refinery. Petition at P-6, P-7, P-12, P-16, P-17. The Petition requests an alternative emission limit (“AEL”) that would be applicable during periods of startup and shutdown of fuel combustion emission sources equipped with continuous emissions monitors (“CEMS”) for CO and oxygen. *Id.* at P-7, P-16, P-17.

3. The proposed AEL consists of an alternate work practice standard consistent with the existing alternate work practices required during startup and shutdown under the National Emission Standard for Hazardous Air Pollutants (“NESHAP”) for Major Sources: Industrial,

Commercial, and Institutional Boilers and Process Heaters at 40 C.F.R. Part 63 Subpart DDDDD. *Id.*

4. The Petition demonstrates that the proposed AEL is consistent with the United States Environmental Protection Agency's ("USEPA") criteria for AELS that would be applicable during periods of startup, shutdown, and malfunction ("SSM"). *See id.* at P-59 through P-64.

5. The Petition's Technical Support Document ("TSD") demonstrates that startup CO emissions from the select fuel combustion emission sources have an insignificant impact on air quality and do not exceed the CO National Ambient Air Quality Standards ("NAAQS"). *See id.* at P-28, P-33, P-34, P-38; *see* TSD. Modeled ambient CO concentrations from worst-case startup emissions were 26.8% and 13.9% of the USEPA's 1-hr average and 8-hr. average Significant Impact Levels ("SILs") for CO. *Id.* at P-51, P-52. Using an overly conservative CO monitor for CO background (Illinois EPA's near-road monitor in Lansing, IL), the worst-case startup emissions resulted in modeled ambient concentrations well below the 1-hr and 8-hr. average CO NAAQS, at only 8.6% and 14.8%, respectively. *Id.* at P-52, P-53.

6. CITGO caused publication of notice of the filing of its Petition pursuant to Section 104.408 in *The Herald News* on September 13, 2025. Proof of Notice of Petition, AS 26-1 (Sept. 24, 2025). On September 24, 2025, CITGO filed its proof of notice of publication with the Board pursuant to 35 Ill. Adm. Code 104.410. *Id.*

7. The Board accepted CITGO's Petition on October 2, 2025. Order of the Board, AS 26-1 (Oct. 2, 2025).

8. Per 35 Ill. Adm. Code 104.420(a), based on the date of publication, any requests for hearing were due by October 6, 2025. No requests for hearing were filed with the Board.

9. On October 27, 2025, Illinois EPA filed its Recommendation in accordance with Section 104.416 of the Board's regulations. Recommendation of Illinois EPA, AS 26-1 (Oct. 27, 2025).

10. In its Recommendation, Illinois EPA stated that it "does not object to the Board granting CITGO's request." Recommendation at 1.

11. In the Recommendation, Illinois EPA further stated as follows:

a. "CITGO provided robust and adequate technical support within the TSD included with the proposed adjusted standard Petition." Recommendation at 10.

b. "The Agency, like CITGO, is unaware of any control technologies or operational limitations that could limit CO emissions during startup or shutdown periods with decreased combustion temperature to below the standard in Section 216.121." Recommendation at 7.

c. "The Agency does not anticipate an increase or decrease in emissions from the units should the adjusted standard be granted." Recommendation at 10.

d. "The Agency agrees that CITGO provided with its Petition sufficient information regarding the specific emissions impacts of the SMB events including worst-case quantification, modeling, and information related to modeling including the data inputs and considers this sufficient evidence that operation under the proposed adjusted standard will not result in air quality impacts that are harmful or violate federal air quality standards. USEPA staff also reviewed the technical support provided by CITGO and agreed with this conclusion." Recommendation at 10-11.

12. CITGO supports Illinois EPA's Recommendation and agrees with Illinois EPA's conclusions as to the requested relief in the proposed Adjusted Standard.

13. As noted by Illinois EPA, the relief sought in the proposed Adjusted Standard is very similar to the rule amendments proposed by the American Petroleum Institute and adopted by the Board in PCB R 23-18(A). Recommendation at 15 (“Both involve similar CO limitations, and both involve incorporating similar standards established in NESHAPs to apply during certain modes of operation when compliance with otherwise applicable emission limitations might be problematic.”).

14. CITGO respectfully requests that the Board move forward with CITGO’s Adjusted Standard Petition and enter an Order granting the relief requested.

15. This response is filed within 14 days of the date of service of the Recommendation in accordance with 35 Ill. Adm. Code 104.416(d).

WHEREFORE, Petitioner, CITGO Petroleum Corporation, requests that the Board accept this Response to Illinois EPA’s Recommendation and enter an Order granting Petitioner’s Adjusted Standard.

Respectfully submitted,

CITGO PETROLEUM
CORPORATION

Dated: November 4, 2025

By: /s/ Melissa S. Brown
One of Its Attorneys

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