CITGO Petroleum Corporation

P.O. Box 4689
Houston, TX 77210-4689

CERTIFIED MAIL RETURN RECEIPT REQUESTED
7008 0500 0001 2119 9436

January 12, 2009

Chief
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611, Ben Franklin Station
Washington, DC 20044-7611
Reference Case No. 90-5-2-1-07277

Withdrawal of AMP Request as a Result of Recent Revisions to Definition of Fuel Gas
NESHAP FF Incinerator (Benzene Waste Water Incinerator)
Marine Emission Control Combustors
CPI Vapor Combustor
Corpus Christi Refinery
Civil Action Number H-04-3883
Southern District of Texas, Consent Decree entered January 26, 2005

Dear Chief:

CITGO Petroleum Corporation (CITGO) submitted Alternate Monitoring Plans (AMPs) to the U.S. Environmental Protection Agency (USEPA) on July 26, 2005, for the units listed below. These AMPs were submitted in accordance of Section V.G., Paragraph 64 of the Consent Decree agreement entered on January 26, 2005. The NESHAP FF Incinerator AMP was revised on March 24, 2006 based on comments received from EPA Region 6.

Unit	AMP Submittal Date	AMP Revision Date
Marine Emission Control	July 26, 2005	-
NESHAP FF Incinerator	July 26, 2005	March 24, 2006
CPI Vapor Combustor	July 26, 2005	-

On June 25, 2008, 40 CFR Part 60, Subpart J amendments were published in a Federal Register notice of final rulemaking (73 Fed. Reg. 35838, *et seq.*). Among the various changes adopted, the definition of "fuel gas", in Subpart J, was amended to exclude vapors that are collected and combusted to comply with the wastewater provisions in §60.692, 40 CFR 61.343 through 61.348, or 40 CFR 63.647, or the marine tank vessel loading provisions in 40 CFR 63.562 or 40 CFR 63.651.

Based on the new definition for fuel gas in 40 CFR 60.101(d), H_2S monitoring requirements are no longer necessary for the following control devices, located at the Corpus Christi Refinery and referenced in Appendix F of the above mentioned Consent Decree. We would like to request the withdrawal of the AMPs for these units:

Equipment Regulatory Standard
WWT Combustor - 40 CFR 60 Subpart QQQ, 61 Subpart FF, 63 Subpart CC
Dock Vapor Combustor - 40 CFR 63 Subparts Y and CC
Dock Vapor Combustor - 40 CFR 63 Subparts Y and CC
Dock Vapor Combustor - 40 CFR 63 Subparts Y and CC
82-ME-016 CPI Vapor Combustor - 40 CFR 63 Subparts Y and CC

If you have any questions, or require additional information, please contact me at 832-486-5570.

Sincerely,

Allen Greene
Manager, Environmental Protection

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Mary Claire Lyons
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Matrix New World Engineering Inc. (*via email only*)