UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

AUG 1 6 2011

Mr. Allen Greene
Manager, Environmental Protection
Citgo Petroleum Corporation
Post Office Box 4689
Houston, TX 77210-4689

Re: Alternative Monitoring Plan ("AMP") – Cumene Depropanizer Off Gas Vent Stream Subject to New Source Performance Standards ("NSPS") for Refineries Part 60 Subpart J; Citgo Corpus Christi East Refinery located in Corpus Christi, Nueces County, Texas.

Dear Mr. Greene:

This letter is in response to your AMP request dated March 24, 2006, concerning a fuel gas stream that you have identified as inherently low in sulfur content under NSPS Part 60 Subpart J. The Environmental Protection Agency (EPA) has evaluated your request in light of changes made to Subpart J on June 24, 2008 (73 Federal Register 35866), and finds that your AMP request is no longer valid since an exemption provided in the rule applies to the stream, as explained below.

Specifically, your AMP provided information pertaining to the Cumene Depropanizer Off Gas that contains very low amounts of sulfur compounds at all times due to upstream treatment required to meet the low sulfur requirements for feeds to the sulfur-sensitive cumene process (i.e., sulfur is a catalyst poison). Based upon the information you provided, the Cumene Depropanizer Off Gas is a fuel gas that meets the exemption requirement of 40 CFR §60.105(a)(4)(iv)(C) {i.e., the vent stream is considered inherently low in sulfur since it is produced in a process unit intolerant to sulfur contamination}. Therefore, the fuel gas combustion device does not need to meet the monitoring requirements of either 40 CFR §60.105(a)(3) or §60.105(a)(4).

If refinery operations change such that the sulfur content for this vent stream changes, then Citgo must document the change(s) and determine if the fuel gas stream remains exempt. If it is determined that the stream is no longer exempt, continuous monitoring must begin within 15 days of the change in accordance with 40 CFR §60.105(a)(4)(iv). If you have any questions or concerns about this determination, please feel free to contact Mr. Emad Shahin of my staff at (214) 665-7484.

Sincerely,

David F. Garcia
Associate Director
Air/Toxics & Inspection
Coordination Branch

cc: Michael De La Cruz (TCEQ)