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CITGO Petroleum Corporation

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

CERTIFIED MAIL RETURN RECEIPT REQUESTED
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Air/Toxics & Inspection Coordination Branch
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March 24, 2006

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

Re:
Alternative Monitoring Plans, Appendix E and F
Corpus Christi East Refinery and Corpus Christi West Refinery
CITGO Petroleum Corporation
Civil Action Number H-04-3883
Southern District of Texas, Consent Decree entered January 26, 2005

Dear Chief:

CITGO submitted on July 26, 2005, pursuant to Section V.G., Paragraph 64.c. of the referenced Consent Decree, requests for Alternative Monitoring Plans (AMP) for NSPS Subpart J refinery fuel gas streams and fuel gas combustion devices at the Corpus Christi East Refinery and the Corpus Christi West Refinery. CITGO received a denial letter dated February 22, 2006 for one of the AMPs submitted. Therefore, CITGO has revised the AMPs and requests that the enclosed AMPs replace the July 26, 2005 submittals described in Enclosure 1. The AMP requests for fuel gas streams listed in Appendix E and fuel gas combustion devices listed in Appendix F are included as Enclosures 2 - 10.

Copies are being provided to EPA Headquarters and the Applicable EPA Region as described in Section XVII.

If there are questions, or additional information is required, please contact Janice DeVelasco at 832-486-1521.

Sincerely,

Janice DeVelasco

Allen Greene
Manager Environmental Protection

Enclosures

Covered Refineries

Certified # 7005 0390 0005 3108 3064
U.S. Environmental Protection Agency
Director, Air Enforcement Division
Office of Regulatory Enforcement
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Mail Code 2242-A
Washington, DC 20460-0001

Manager, Environmental Services
CITGO
1293 Eldridge Parkway
Houston, TX 77077

General Counsel
CITGO
1293 Eldridge Parkway
Houston, TX 77077

Corpus Christi East Refinery and Corpus Christi West Refinery

Certified # 7005 0390 0005 3108 3071
Chief
Air, Toxics, and Inspections Coordination Branch
Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

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ENCLOSURE 1

ALTERNATIVE MONITORING PLANS
CITGO Petroleum Corporation
CONSENT DECREE APPENDIX E

REFINERY	FUEL GAS STREAM	ENCLOSURE NUMBER
Corpus Christi East	Cumene Depropanizer Off Gas	2
Corpus Christi East	Hydrar Stabilizer OH Off Gas	3
Corpus Christi East	Hydrar Stripper Off Gas	4
Corpus Christi East	Hydrar Hydrogen	5
Corpus Christi East	Hydrar Degassing Drum Off Gas	6
Corpus Christi East	C5 Merox Disulfide Separator Spent Air Vent	7
Corpus Christi West	Merox Disulfide Separator Spent Air Vent	8

ALTERNATIVE MONITORING PLANS
CITGO Petroleum Corporation
CONSENT DECREE APPENDIX F

REFINERY	FUEL GAS COMBUSTION DEVICE	ENCLOSURE NUMBER
Corpus Christi East	NESHAP FF Incinerator	9
Corpus Christi East	CPI Vapor Combustor	10