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") – Hydrar Process Unit Vent Streams Subject to New Source Performance Standards ("NSPS") for Refineries (40 CFR 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 specific fuel gas streams 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in light of changes made to Subpart J on June 24, 2008 (73 Federal Register 35866), and finds that your AMP request is no longer valid since an exemption provided in the rule applies to the streams associated with the Hydrar Hydrogen process unit operations, as explained below.

Specifically, your AMP provided information pertaining to three vent gas streams from the following Hydrar process unit operations routed to the fuel gas system, which is required to be nearly free of sulfur compounds since sulfur is a catalyst poison:

1. Hydrar Hydrogen Vent Gas
2. Hydrar Unit Stripper Off Gas
3. Hydrar Degassing Drum Off Gas

Based upon the information you provided, the specified Hydrar vent stream fuels are fuel gases that meet 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) *for these specified vent streams.*

If refinery operations change such that the sulfur content for these vent streams change, then Citgo must document the change(s) and determine if the fuel gas streams remain 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)