



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

AUG 23 2005

(AE-17J)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mark Smith, Plant Manager
Citgo Petroleum Corporation
135th Street and New Avenue
Lemont, Illinois 60439-3659

Re: Notice of Violation
Citgo Petroleum Corporation
Lemont, Illinois

Dear Mr. Smith:

The United States Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) to the Citgo Petroleum Corporation ("Citgo" or you) under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). We find that you have violated the Illinois State Implementation Plan at your Lemont, Illinois facility.

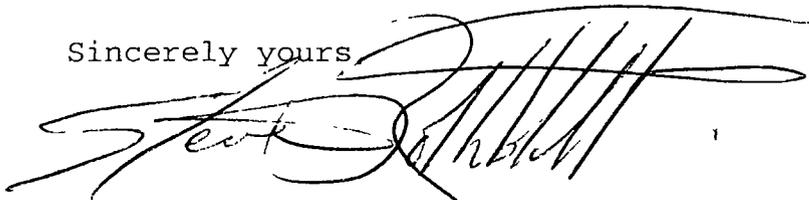
Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action. The options we select may depend on, among other things, the length of time you take to achieve and demonstrate continuous compliance with the rules cited in the NOV.

We are offering you an opportunity to confer with us about the violations alleged in the NOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply, and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Katherine Keith. You may call her at (312) 353-6956 to request a conference. You should make the request as soon as possible, but no later than 10 calendar days after you receive this letter. We should hold any conference within 30 calendar days of your receipt of this letter.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Stephen Rothblatt", written over a horizontal line.

Stephen Rothblatt, Director
Air and Radiation Division

Enclosure

cc: Claude Harmon, Environmental Manager
Citgo Petroleum Corporation
Lemont, Illinois

Julie Armitage, Acting Manager
Compliance and Systems Management Section
Illinois Environmental Protection Agency

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:)
)
Citgo Petroleum Corporation) **NOTICE OF VIOLATION**
Lemont, Illinois)
) **EPA-5-05-20-IL**
Proceedings Pursuant to)
Section 113(a)(1) of the)
Clean Air Act, 42 U.S.C.)
§ 7413(a)(1))
_____)

NOTICE OF VIOLATION

The United States Environmental Protection Agency (U.S. EPA) is issuing this Notice of Violation under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). U.S. EPA finds that the Citgo Petroleum Corporation (Citgo) is violating the Illinois State Implementation Plan (SIP), as follows:

Statutory and Regulatory Background

1. On February 21, 1980, U.S. EPA approved 35 IAC 212.381 as part of the federally enforceable SIP for Illinois. 45 Fed. Reg. 11493.
2. 35 IAC 212.381 requires that no owner or operator of a new or existing catalyst regenerator emit particulate matter exceeding the following rate in a one-hour period:
 - a. If the catalyst recycle rate (P) is less than or equal to 30 tons per hour, the emission rate (E) shall not exceed $E = 4.10(P)^{0.67}$.
 - b. If the catalyst recycle rate (P) is greater than 30 tons per hour, the emission rate (E) shall not exceed $E = (55.0(P)^{0.11}) - 40.0$.

Citgo's Facility

3. Citgo owns and operates a petroleum refinery at 135 Street and New Avenue in Lemont, Illinois (Lemont refinery).
4. Citgo operates a Fluidized Catalytic Cracking Unit (FCCU) at its Lemont refinery. The FCCU is equipped with a Catalyst

Regenerator. Control equipment on the FCCU consists of a CO Boiler and an electrostatic precipitator (ESP). Emissions from the FCCU/Catalyst Regenerator are typically routed through the CO Boiler and then the ESP. In the event of a CO Boiler shutdown, emissions from the FCCU/Catalyst Regenerator are vented directly to the atmosphere.

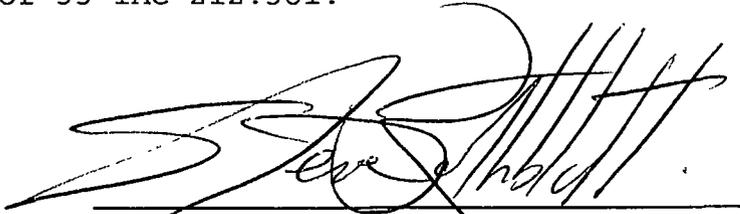
4. Emissions from Citgo's FCCU/Catalytic Regenerator are subject to the particulate emission regulations in the Illinois SIP at 35 IAC 212.381.

Violations

5. From February 28, 2005 through March 9, 2005, Citgo shut down the CO Boiler on its FCCU for maintenance. Citgo continued to operate the FCCU and emissions from the FCCU were vented directly to the atmosphere.
6. During the CO Boiler shutdown, the charge rate to the FCCU was reduced from approximately 68,000 barrels/day to 48,000 barrels/day. During the shutdown, the catalyst recirculation rate was 43.5 tons/minute (2610 tons/hr). Based on the equation in 35 IAC 212.381, the allowable particulate emission rate from the FCCU during the CO Boiler shutdown was 90.68 lbs/hr.
7. Actual particulate emissions from the FCCU during the time period that the CO Boiler was shut down averaged 232 lbs/hr. This is a violation of 35 IAC 212.381.

8/23/2005

Date



Stephen Rothblatt, Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Betty Williams, certify that I sent a Notice of Violation, No. EPA-5-05-20-IL, by Certified Mail, Return Receipt Requested, to:

Mark Smith, Plant Manager
Citgo Petroleum Corporation
135th Street and New Avenue
Lemont, Illinois 60439-3659

I also certify that I sent copies of the Notice of Violation by first class mail to:

Claude Harmon, Manager
Environmental Control
Citgo Petroleum Corporation
135th Street and New Avenue
Lemont, Illinois 60439-3659

Julie Armitage, Acting Manager
Compliance and Systems Management Section
Illinois Environmental Protection Agency

on the 23rd day of August, 2005.

Phyllis Dixon for
Betty Williams, Secretary
AECAS, (IL/IN)
(312) 353-9299

CERTIFIED MAIL RECEIPT NUMBER: 70010320000614478232