

Executive Summary – Enforcement Matter – Case No. 61194
CITGO Refining and Chemicals Company L.P.
RN102555166
Docket No. 2021-1085-AIR-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

CITGO Corpus Christi Refinery East Plant, 1801 Nueces Bay Boulevard, Corpus Christi,
Nueces County

Type of Operation:

Petroleum refinery

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: January 14, 2022

Comments Received: No

Penalty Information

Total Penalty Assessed: \$21,150

Amount Deferred for Expedited Settlement: \$4,230

Total Paid to General Revenue: \$16,920

Total Due to General Revenue: \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: May 12, 2021 through June 1, 2021 and May 21, 2021
through June 24, 2021

Date(s) of NOE(s): August 11, 2021 and August 12, 2021

Executive Summary – Enforcement Matter – Case No. 61194
CITGO Refining and Chemicals Company L.P.
RN102555166
Docket No. 2021-1085-AIR-E

Violation Information

1. Failed to prevent unauthorized emissions. Specifically, the Respondent released 713.97 pounds ("lbs") of volatile organic compounds ("VOC"), 566.46 lbs of carbon monoxide ("CO"), 894.95 lbs of sulfur dioxide ("SO₂"), 8.68 lbs of hydrogen sulfide ("H₂S"), and 102.76 lbs of nitrogen oxides ("NO_x") from the Fluor Flare, Emissions Point Number ("EPN") F442, and 403.54 lbs of VOC, 0.13 lb of ammonia, and 1.55 lbs of H₂S as fugitive emissions, during an emissions event (Incident No. 354954) that occurred on April 28, 2021 and lasted five hours and 33 minutes. The emissions event occurred due to a lack of substrate reinforcement, outdated design, and degradation over time for a manual isolation valve that caused a packing leak, resulting in flaring and the release to the atmosphere. Since the emissions event was not caused by a sudden unavoidable breakdown of equipment or process beyond the control of the owner or operator and could have been avoided by better design and/or better operational and maintenance practices, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review ("NSR") Permit Nos. 2699A, PSDTX36, PSDTX96, PSDTX653M1, and PSDTX831, Special Conditions ("SC") No. 1, Federal Operating Permit ("FOP") No. O1423, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 28, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

2. Failed to prevent unauthorized emissions. Specifically, the Respondent released 1,053.15 lbs of VOC, 291.76 lbs of CO, 53.36 lbs of NO_x, 338.60 lbs of SO₂, and 2.65 lbs of H₂S from multiple sources, during an emissions event (Incident No. 355167) that occurred on May 2, 2021 and lasted one hour and 45 minutes. The emissions event occurred due to the failure of an improperly-sized clamp that was unable to effectively seal and retain the rope packing, resulting in flaring and the release to the atmosphere. Since the emissions event was not caused by a sudden unavoidable breakdown of equipment or process beyond the control of the owner or operator and could have been avoided by better design and/or better operational and maintenance practices, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 2699A, PSDTX36, PSDTX96, PSDTX653M1, and PSDTX831, SC No. 1, FOP No. O1423, GTC and STC No. 28, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

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Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

N/A

Technical Requirements:

The Order will require the Respondent to:

a. Within 30 days:

i. Implement measures and/or procedures designed to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 354954; and

ii. Implement measures and/or procedures designed to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 355167.

b. Within 45 days, submit written certification to demonstrate compliance with a.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Kate Dacy, Enforcement Division, Enforcement Team 4, MC 219, (512) 239-4593; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: Jim Cristman, Vice President and Manufacturing Manager, CITGO Refining and Chemicals Company L.P., P.O. Box 9176, Corpus Christi, Texas 78469

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	16-Aug-2021			
	PCW	25-Oct-2021	Screening	17-Aug-2021	EPA Due

RESPONDENT/FACILITY INFORMATION	
Respondent	CITGO Refining and Chemicals Company L.P.
Reg. Ent. Ref. No.	RN102555166
Facility/Site Region	14-Corpus Christi
Major/Minor Source	Major

CASE INFORMATION			
Enf./Case ID No.	61194	No. of Violations	2
Docket No.	2021-1085-AIR-E	Order Type	1660
Media Program(s)	Air	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Kate Dacy
		EC's Team	Enforcement Team 4
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$15,000
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History	41.0% Adjustment	Subtotals 2, 3, & 7	\$6,150
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Notes: Enhancement for one NOV with same/similar violations, two NOVs with dissimilar violations, and two agreed orders containing a denial of liability. Reduction for four notices of intent to conduct an audit and two disclosures of violations.

Culpability	No	0.0% Enhancement	Subtotal 4	\$0
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Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments	Subtotal 5	\$0
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Economic Benefit	0.0% Enhancement*	Subtotal 6	\$0
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Total EB Amounts: \$1,003
 Estimated Cost of Compliance: \$20,000
 *Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$21,150
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0% Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes: [Empty box]

Final Penalty Amount	\$21,150
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$21,150
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DEFERRAL	20.0% Reduction	Adjustment	-\$4,230
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY	\$16,920
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Screening Date 17-Aug-2021

Docket No. 2021-1085-AIR-E

PCW

Respondent CITGO Refining and Chemicals Company L.P.

Policy Revision 5 (January 28, 2021)

Case ID No. 61194

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN102555166

Media Air

Enf. Coordinator Kate Dacy

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	1	5%
	Other written NOVs	2	4%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	2	40%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	4	-4%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	2	-4%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 41%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for one NOV with same/similar violations, two NOVs with dissimilar violations, and two agreed orders containing a denial of liability. Reduction for four notices of intent to conduct an audit and two disclosures of violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 41%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 41%

Screening Date 17-Aug-2021 **Docket No.** 2021-1085-AIR-E **PCW**
Respondent CITGO Refining and Chemicals Company L.P. *Policy Revision 5 (January 28, 2021)*
Case ID No. 61194 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN102555166
Media Air
Enf. Coordinator Kate Dacy

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review ("NSR") Permit Nos. 2699A, PSDTX36, PSDTX96, PSDTX653M1, and PSDTX831, Special Conditions ("SC") No. 1, Federal Operating Permit ("FOP") No. O1423, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 28, and Tex. Health & Safety Code § 382.085(b)

Violation Description Failed to prevent unauthorized emissions. Specifically, the Respondent released 713.97 pounds ("lbs") of volatile organic compounds ("VOC"), 565.46 lbs of carbon monoxide ("CO"), 894.95 lbs of sulfur dioxide ("SO2"), 8.68 lbs of hydrogen sulfide ("H2S"), and 102.76 lbs of nitrogen oxides ("NOx") from the Fluor Flare, Emissions Point Number ("EPN") F442, and 403.54 lbs of VOC, 0.13 lb of ammonia, and 1.55 lbs of H2S as fugitive emissions, during an emissions event (Incident No. 354954) that occurred on April 28, 2021 and lasted five hours and 33 minutes. The emissions event occurred due to a lack of substrate reinforcement, outdated design, and degradation over time for a manual isolation valve that caused a packing leak, resulting in flaring and the release to the atmosphere. Since the emissions event was not caused by a sudden unavoidable breakdown of equipment or process beyond the control of the owner or operator and could have been avoided by better design and/or better operational and maintenance practices, the Respondent is precluded from asserting an affirmative defense under 30 Tex. Admin. Code § 101.222.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual			x	30.0%
	Potential				

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
					0.0%

Matrix Notes Human health or the environment has been exposed to insignificant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of this violation.

Adjustment \$17,500

\$7,500

Violation Events

Number of Violation Events 1 1 Number of violation days

daily	
weekly	
monthly	x
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$7,500

One monthly event is recommended.

Good Faith Efforts to Comply 0.0% Reduction \$0

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	

Notes The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$7,500

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount \$504 **Violation Final Penalty Total** \$10,575

This violation Final Assessed Penalty (adjusted for limits) \$10,575

Economic Benefit Worksheet

Respondent CITGO Refining and Chemicals Company L.P.
Case ID No. 61194
Reg. Ent. Reference No. RN102555166
Media Air
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	28-Apr-2021	1-May-2022	1.01	\$504	n/a	\$504

Notes for DELAYED costs
 Estimated cost to implement measures and/or procedures designed to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 354954. The Date Required is the date the emissions event occurred and the Final Date is the estimated date of compliance.

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$10,000

TOTAL \$504

Screening Date 17-Aug-2021 **Docket No.** 2021-1085-AIR-E **PCW**
Respondent CITGO Refining and Chemicals Company L.P. *Policy Revision 5 (January 28, 2021)*
Case ID No. 61194 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN102555166
Media Air
Enf. Coordinator Kate Dacy

Violation Number 2

Rule Cite(s)
 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 2699A, PSDTX36, PSDTX96, PSDTX653M1, and PSDTX831, SC No. 1, FOP No. O1423, GTC and STC No. 28, and Tex. Health & Safety Code § 382.085(b)

Violation Description
 Failed to prevent unauthorized emissions. Specifically, the Respondent released 1,053.15 lbs of VOC, 291.76 lbs of CO, 53.36 lbs of NOx, 338.60 lbs of SO2, and 2.65 lbs of H2S from multiple sources (see attached Emissions Event Table), during an emissions event (Incident No. 355167) that occurred on May 2, 2021 and lasted one hour and 45 minutes. The emissions event occurred due to the failure of an improperly sized clamp that was unable to effectively seal and retain the rope packing, resulting in flaring and the release to the atmosphere. Since the emissions event was not caused by a sudden unavoidable breakdown of equipment or process beyond the control of the owner or operator and could have been avoided by better design and/or better operational and maintenance practices, the Respondent is precluded from asserting an affirmative defense under 30 Tex. Admin. Code § 101.222.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR	Harm			Percent	
	Release	Major	Moderate		Minor
	Actual				x
	Potential				

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
					0.0%

Matrix Notes
 Human health or the environment has been exposed to insignificant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of this violation.

Adjustment \$17,500

\$7,500

Violation Events

Number of Violation Events 1 1 Number of violation days

daily	
weekly	
monthly	x
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$7,500

One monthly event is recommended.

Good Faith Efforts to Comply 0.0% Reduction \$0

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	

Notes
 The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$7,500

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount \$499

Violation Final Penalty Total \$10,575

This violation Final Assessed Penalty (adjusted for limits) \$10,575

Economic Benefit Worksheet

Respondent CITGO Refining and Chemicals Company L.P.
Case ID No. 61194
Reg. Ent. Reference No. RN102555166
Media Air
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	2-May-2021	1-May-2022	1.00	\$499	n/a	\$499

Notes for DELAYED costs
 Estimated cost to implement measures and/or procedures designed to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 355167. The Date Required is the date the emissions event occurred and the Final Date is the estimated date of compliance.

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$10,000

TOTAL \$499

CITGO Refining and Chemicals Company L.P.
Docket No. 2021-1085-AIR-E; Case ID No. 61194

Emissions Event Table (Incident No. 355167)						
Source Name	EPN	Pollutant (lbs)				
		VOC	CO	NOx	SO2	H2S
Fugitives	N/A	736.45	0.00	0.00	0.00	0.00
Cumene Flare	N/A	49.98	65.36	12.04	44.40	0.39
Fluor Flare	F442	266.72	226.40	41.32	294.20	2.26
Totals:		1,053.15	291.76	53.36	338.60	2.65

N/A = Not applicable

The TCEQ is committed to accessibility.

To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.



Compliance History Report

Compliance History Report for CN600127922, RN102555166, Rating Year 2021 which includes Compliance History (CH) components from September 1, 2016, through August 31, 2021.

Customer, Respondent, or Owner/Operator:	CN600127922, CITGO Refining and Chemicals Company L.P.	Classification:	SATISFACTORY	Rating:	4.82
Regulated Entity:	RN102555166, CITGO CORPUS CHRISTI REFINERY EAST PLANT	Classification:	SATISFACTORY	Rating:	3.99
Complexity Points:	35	Repeat Violator:	NO		
CH Group:	02 - Oil and Petroleum Refineries				
Location:	1801 NUECES BAY BOULEVARD IN CORPUS CHRISTI, NUECES COUNTY, TEXAS				
TCEQ Region:	REGION 14 - CORPUS CHRISTI				

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER NE0027V
AIR OPERATING PERMITS PERMIT 3542
AIR NEW SOURCE PERMITS PERMIT 2697A
AIR NEW SOURCE PERMITS PERMIT 2700A
AIR NEW SOURCE PERMITS PERMIT 2704A
AIR NEW SOURCE PERMITS PERMIT 2708A
AIR NEW SOURCE PERMITS PERMIT 3123A
AIR NEW SOURCE PERMITS PERMIT 5418A
AIR NEW SOURCE PERMITS PERMIT 8653A
AIR NEW SOURCE PERMITS REGISTRATION 10733A
AIR NEW SOURCE PERMITS PERMIT 2709A
AIR NEW SOURCE PERMITS PERMIT 19044
AIR NEW SOURCE PERMITS PERMIT 21358
AIR NEW SOURCE PERMITS PERMIT 22312
AIR NEW SOURCE PERMITS REGISTRATION 23834
AIR NEW SOURCE PERMITS PERMIT 46637
AIR NEW SOURCE PERMITS PERMIT 46640
AIR NEW SOURCE PERMITS ACCOUNT NUMBER NE0027V
AIR NEW SOURCE PERMITS REGISTRATION 10309
AIR NEW SOURCE PERMITS AFS NUM 4835500003
AIR NEW SOURCE PERMITS REGISTRATION 54775
AIR NEW SOURCE PERMITS PERMIT 72654
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX831
AIR NEW SOURCE PERMITS REGISTRATION 76883
AIR NEW SOURCE PERMITS REGISTRATION 77094
AIR NEW SOURCE PERMITS REGISTRATION 78195
AIR NEW SOURCE PERMITS PERMIT 80801
AIR NEW SOURCE PERMITS REGISTRATION 83913
AIR NEW SOURCE PERMITS REGISTRATION 139905
AIR NEW SOURCE PERMITS REGISTRATION 129920
AIR NEW SOURCE PERMITS REGISTRATION 111397
AIR NEW SOURCE PERMITS REGISTRATION 139781
AIR NEW SOURCE PERMITS REGISTRATION 136760
AIR NEW SOURCE PERMITS REGISTRATION 111955
AIR NEW SOURCE PERMITS REGISTRATION 154927
AIR NEW SOURCE PERMITS PERMIT AMOC68
AIR NEW SOURCE PERMITS REGISTRATION 164588
AIR NEW SOURCE PERMITS REGISTRATION 141429
AIR NEW SOURCE PERMITS REGISTRATION 151026
AIR NEW SOURCE PERMITS REGISTRATION 151002

AIR OPERATING PERMITS PERMIT 1423
AIR NEW SOURCE PERMITS PERMIT 2695A
AIR NEW SOURCE PERMITS PERMIT 2699A
AIR NEW SOURCE PERMITS PERMIT 2703A
AIR NEW SOURCE PERMITS PERMIT 2706A
AIR NEW SOURCE PERMITS PERMIT 3119A
AIR NEW SOURCE PERMITS PERMIT 3857A
AIR NEW SOURCE PERMITS PERMIT 6722A
AIR NEW SOURCE PERMITS PERMIT 9604A
AIR NEW SOURCE PERMITS REGISTRATION 12005A
AIR NEW SOURCE PERMITS PERMIT 4979A
AIR NEW SOURCE PERMITS PERMIT 20156
AIR NEW SOURCE PERMITS PERMIT 21706
AIR NEW SOURCE PERMITS REGISTRATION 22418
AIR NEW SOURCE PERMITS REGISTRATION 30099
AIR NEW SOURCE PERMITS PERMIT 46641
AIR NEW SOURCE PERMITS PERMIT 46642
AIR NEW SOURCE PERMITS PERMIT 6748
AIR NEW SOURCE PERMITS REGISTRATION 56720
AIR NEW SOURCE PERMITS REGISTRATION 53921
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX653M1
AIR NEW SOURCE PERMITS REGISTRATION 75340
AIR NEW SOURCE PERMITS REGISTRATION 76742
AIR NEW SOURCE PERMITS REGISTRATION 77066
AIR NEW SOURCE PERMITS REGISTRATION 78522
AIR NEW SOURCE PERMITS REGISTRATION 80521
AIR NEW SOURCE PERMITS REGISTRATION 83882
AIR NEW SOURCE PERMITS PERMIT 103666
AIR NEW SOURCE PERMITS REGISTRATION 139385
AIR NEW SOURCE PERMITS REGISTRATION 111399
AIR NEW SOURCE PERMITS REGISTRATION 138157
AIR NEW SOURCE PERMITS REGISTRATION 139767
AIR NEW SOURCE PERMITS REGISTRATION 111443
AIR NEW SOURCE PERMITS REGISTRATION 111391
AIR NEW SOURCE PERMITS PERMIT AMOC53
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX36
AIR NEW SOURCE PERMITS REGISTRATION 163223
AIR NEW SOURCE PERMITS REGISTRATION 141703
AIR NEW SOURCE PERMITS REGISTRATION 148586
AIR NEW SOURCE PERMITS REGISTRATION 151502

AIR NEW SOURCE PERMITS REGISTRATION 146219
AIR NEW SOURCE PERMITS REGISTRATION 160982
AIR NEW SOURCE PERMITS REGISTRATION 161396
AIR NEW SOURCE PERMITS REGISTRATION 159107
IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION # (SWR) 30532
WASTEWATER EPA ID TX0006211
AIR EMISSIONS INVENTORY ACCOUNT NUMBER NE0027V

AIR NEW SOURCE PERMITS REGISTRATION 149580
AIR NEW SOURCE PERMITS REGISTRATION 155845
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX96
AIR NEW SOURCE PERMITS REGISTRATION 156156
WASTEWATER PERMIT WQ0000467000
WASTEWATER PERMIT TXG670236
POLLUTION PREVENTION PLANNING ID NUMBER P00139
INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD051161990

INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50160
INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 30532

Compliance History Period: September 01, 2016 to August 31, 2021 **Rating Year:** 2021 **Rating Date:** 09/01/2021

Date Compliance History Report Prepared: October 25, 2021

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: October 25, 2016 to October 25, 2021

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Kate Dacy

Phone: (512) 239-4593

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

1 Effective Date: 03/07/2018 ADMINORDER 2017-0421-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(e)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP OP

Description: Failed to submit an initial notification for an excess opacity event within 24 hours after discovery, in violation of 30 TEX. ADMIN. CODE §§101.201(e) and 122.143(4), TEX. HEALTH & SAFETY CODE §382.085(b), and Federal Operating Permit ("FOP") No. O1423, Special Terms and Conditions ("STC") No. 2.F. Specifically, the Respondent did not notify the TCEQ within 24 hours after the discovery of an excess opacity event that occurred on March 10, 2015.

Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP OP

NSR PERMIT

Description: Failed to comply with the opacity limit of 20 percent averaged over a six-minute period, in violation of 30 TEX. ADMIN. CODE §§111.111(a)(1)(B), 116.115(c), and 122.143(4), TEX. HEALTH & SAFETY CODE §382.085(b), FOP No. O1423, STC No. 26, and New Source Review ("NSR") Permit No. 3123A, Special Conditions ("SC") No. 3. Specifically, on March 10, 2015, the Number 1 Fluid Catalytic Cracking Unit's Continuous Opacity Monitoring System measured an average opacity of 77 percent for a period that

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT Y 61.272(a)(2)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP OP

NSR PERMIT

Description: Failed to perform an annual inspection of benzene storage vessels, in violation of 30 TEX. ADMIN. CODE §§101.20(2), 116.115(c), and 122.143(4), TEX. HEALTH & SAFETY CODE §382.085(b), 40 CODE OF FEDERAL REGULATIONS ("CFR") §61.272(a)(2), FOP No. O1423, STC No. 26, and NSR Permit No. 20156, SC No. 7.C. Specifically,

the Respondent did not perform an annual inspection of the benzene storage vessel, EPN 85-TK-33, in calendar year 2015.

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP OP

Description: Failed to report all instances of deviations, in violation of 30 TEX. ADMIN. CODE §§122.143(4) and 122.145(2)(A), TEX. HEALTH & SAFETY CODE §382.085(b), and FOP No. O1423, General Terms and Conditions. Specifically, the Respondent did not include the deviations for failing to report an excess opacity event within 24 hours after discovery, failing to comply with the opacity limit of 20 percent averaged over a six-minute period, failing to perform an annual inspection of the benzene storage v

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT Y 63.567(h)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP OP

NSR PERMIT

Description: Failed to maintain records of the vessel's annual vapor tightness test, in violation of 30 TEX. ADMIN. CODE §§101.20(2), 116.115(c), and 122.143(4), TEX. HEALTH & SAFETY CODE §382.085(b), 40 CFR §63.567(h), FOP No. O1423, STC No. 26, and NSR Permit No. 3857A, SC No. 8. Specifically, on September 10, 2015, Barge KB/K 10087 11019B was loaded, however, there were no records of the vessel's annual vapor tightness test.

2 Effective Date: 01/14/2020 ADMINORDER 2019-0609-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: [PSDTX653M1] Special Condition 1 PERMIT

Special Term & Condition 26 OP

Description: Failure to prevent unauthorized emissions and to prevent an excess opacity event.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

Item 1	October 26, 2016	(1369728)
Item 2	November 10, 2016	(1384395)
Item 3	November 21, 2016	(1362677)
Item 4	December 09, 2016	(1362314)
Item 5	December 15, 2016	(1390533)
Item 6	January 11, 2017	(1397149)
Item 7	February 16, 2017	(1404032)
Item 8	February 21, 2017	(1393856)
Item 9	March 14, 2017	(1411133)
Item 10	April 11, 2017	(1417636)
Item 11	May 10, 2017	(1425225)
Item 12	June 16, 2017	(1431228)
Item 13	July 17, 2017	(1439837)
Item 14	July 21, 2017	(1423345)
Item 15	August 16, 2017	(1443525)
Item 16	September 13, 2017	(1450152)
Item 17	September 27, 2017	(1428532)
Item 18	October 10, 2017	(1455972)
Item 19	October 13, 2017	(1423975)
Item 20	November 16, 2017	(1461453)
Item 21	November 27, 2017	(1448599)

Item 22	December 19, 2017	(1467832)
Item 23	January 18, 2018	(1474537)
Item 24	February 20, 2018	(1486763)
Item 25	March 20, 2018	(1490440)
Item 26	April 09, 2018	(1474374)
Item 27	May 11, 2018	(1467671)
Item 28	May 18, 2018	(1500595)
Item 29	June 13, 2018	(1489885)
Item 30	June 15, 2018	(1489938)
Item 31	June 20, 2018	(1507712)
Item 32	July 10, 2018	(1497698)
Item 33	July 20, 2018	(1514030)
Item 34	July 31, 2018	(1505514)
Item 35	August 13, 2018	(1483437)
Item 36	August 20, 2018	(1520091)
Item 37	August 22, 2018	(1474386)
Item 38	August 23, 2018	(1511601)
Item 39	August 28, 2018	(1483503)
Item 40	August 31, 2018	(1512865)
Item 41	September 17, 2018	(1513808)
Item 42	September 19, 2018	(1527256)
Item 43	October 11, 2018	(1512375)
Item 44	October 18, 2018	(1533614)
Item 45	November 14, 2018	(1541449)
Item 46	December 20, 2018	(1545233)
Item 47	January 17, 2019	(1559674)
Item 48	March 07, 2019	(1544752)
Item 49	May 06, 2019	(1436881)
Item 50	May 20, 2019	(1583269)
Item 51	May 30, 2019	(1558217)
Item 52	August 02, 2019	(1557848)
Item 53	August 14, 2019	(1575453)
Item 54	August 30, 2019	(1576152)
Item 55	November 25, 2019	(1592698)
Item 56	December 18, 2019	(1626406)
Item 57	December 19, 2019	(1592903)
Item 58	February 18, 2020	(1640666)
Item 59	February 20, 2020	(1631151)
Item 60	February 21, 2020	(1631434)
Item 61	February 23, 2020	(1625258)
Item 62	March 17, 2020	(1647186)
Item 63	April 16, 2020	(1653522)
Item 64	April 23, 2020	(1638147)
Item 65	May 14, 2020	(1660109)
Item 66	May 20, 2020	(1650792)
Item 67	May 22, 2020	(1651695)
Item 68	June 09, 2020	(1652251)
Item 69	June 12, 2020	(1656852)
Item 70	June 23, 2020	(1633340)
Item 71	June 29, 2020	(1657204)
Item 72	August 03, 2020	(1665634)
Item 73	August 17, 2020	(1680345)
Item 74	August 20, 2020	(1664710)
Item 75	September 11, 2020	(1672929)
Item 76	September 16, 2020	(1686914)
Item 77	October 08, 2020	(1679594)
Item 78	October 14, 2020	(1693261)
Item 79	November 13, 2020	(1685531)
Item 80	November 18, 2020	(1679959)
Item 81	December 02, 2020	(1678296)

Item 82	December 03, 2020	(1683718)
Item 83	December 07, 2020	(1692445)
Item 84	December 09, 2020	(1692775)
Item 85	December 10, 2020	(1686115)
Item 86	December 17, 2020	(1712474)
Item 87	December 23, 2020	(1685530)
Item 88	December 28, 2020	(1692498)
Item 89	January 14, 2021	(1692840)
Item 90	January 29, 2021	(1692742)
Item 91	February 16, 2021	(1725528)
Item 92	March 17, 2021	(1725529)
Item 93	April 19, 2021	(1725530)
Item 94	April 23, 2021	(1704190)
Item 95	May 06, 2021	(1704761)
Item 96	May 14, 2021	(1710873)
Item 97	May 28, 2021	(1706539)
Item 98	June 17, 2021	(1747581)
Item 99	July 14, 2021	(1751710)
Item 100	July 20, 2021	(1722540)
Item 101	July 27, 2021	(1737911)
Item 102	August 19, 2021	(1757174)
Item 103	August 27, 2021	(1735088)
Item 104	September 01, 2021	(1710473)
Item 105	September 15, 2021	(1766254)
Item 106	October 13, 2021	(1749275)

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

- 1 Date: 12/31/2020 (1712475)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

- 2 Date: 04/30/2021 (1740071)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

- 3 Date: 08/31/2021 (1745039)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC No. 7 PERMIT
STC No. 28 OP
Description: Failure to comply with the NOx limit of 0.035 lbs/MMBtu at the Charge Heater (EPN 207-H-1).
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC No. 13 PERMIT
STC No. 28 OP
Description: Failure to comply with the NOx limit of 0.045 lbs/MMBtu at the Platformer Reactor Heaters (EPNs 83 and 84).
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 113, SubChapter C 113.780
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1567(a)(2)
 5C THSC Chapter 382 382.085(b)
 SC No. 1 PERMIT
 STC No. 1(E) OP
 STC No. 28 OP
 Description: Failure to comply with the Cl2 limit of 0.17 lbs/hr and the HCl limit of 0.024 lbs/hr at the Catalyst Regenerator Vent (EPN 087).
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC No. 1 PERMIT
 STC No. 28 OP
 Description: Failure to comply with the CO limit of 49.90 lbs/hr at the FCCU 1 Regenerator Stack (EPN F066).
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.103(a)
 5C THSC Chapter 382 382.085(b)
 PSDTX653M1, SC No. 5 PERMIT
 STC No. 1(A) OP
 STC No. 28 OP
 Description: Failure to comply with the 500 ppm CO limits at the FCCU catalyst regenerators.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 PSDTX653M1, SC No. 1 PERMIT
 STC No. 28 OP
 Description: Failure to comply with the CO limits of 287.2 lbs/hr and 287.23 lbs/hr at the No. 2 FCCU Regenerator/ESP Stack (EPN 31-PR-1).
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC No. 2 PERMIT
 STC No. 28 OP
 Description: Failure to comply with the heater duty limit of 475 MMBtu/hr at the Crude Heater (11-H-1).
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC No. 5 PERMIT
 STC No. 2 OP
 Description: Failure to comply with the VOC limit of 3.35 lbs/hr at the Combined Stack for the Crude Heater (11-H-1) and the Vacuum Heater (11-H-2) (EPN 292).
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC No. 1 PERMIT
 STC No. 28 OP
 Description: Failure to comply with the CO limit of 0.20 lbs/hr at the SRU Incinerator Stack (EPN 412).
 Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)(i)
5C THSC Chapter 382 382.085(b)
SC No. 2 PERMIT
SC No. 4 PERMIT
STC No. 1(A) OP
STC No. 28 OP

Description: Failure to comply with the hourly and 12-hour rolling 250 ppm CO limits at the SRU Incinerator Stack (EPN 412).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC No. 1 PERMIT
STC No. 28 OP

Description: Failure to comply with the CO, NOx, VOC, PM, COS, H2S, and SO2 lbs/hr limits at the SRU Incinerator Stacks (EPNs 412 and 412A). Specifically, Citgo East exceeded the applicable emissions limits a total of 21 times during the certification period of February 20, 2019 through February 19, 2020. Refer to the deviation items on page 28 of 50 of the deviation report dated September 18, 2019 and pages 49-50, 52-53, and 58 of 73 of the deviation report dated March 20, 2020.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC No. 12 PERMIT
STC No. 28 OP

Description: Failure to comply with the minimum temperature limit of 1,500° F at the vapor combuster, Dock 7 MEC (EPN MEC7).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13(d)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.105(a)(5)(ii)
5C THSC Chapter 382 382.085(b)
SC No. 2 PERMIT
SC No. 7 PERMIT
STC No. 1(A) OP
STC No. 28 OP

Description: Failure to perform the daily span calibration of the SO2 continuous emissions monitoring system (CEMS) at the SRU Incinerator Stack (EPN 412).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.107a(a)(2)(iii)
5C THSC Chapter 382 382.085(b)
SC No. 4 PERMIT
STC No. 1(A) OP
STC No. 2 OP

Description: Failure to perform a quarterly cylinder gas audit (CGA) for the East Plant Fuel Gas H2S continuous emissions monitoring system (CEMS).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.485a(b)(2)
5C THSC Chapter 382 382.085(b)
STC No. 1(A) OP

Description: Failure to calculate the calibration drift of LDAR monitoring instruments as required.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT GGGGG 63.7941
 5C THSC Chapter 382 382.085(b)
 STC No. 1(A) OP

Description: Failure to replace a carbon cannister within the required timeframe upon discovery of VOC breakthrough.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC No. 10(A)(5) PERMIT
 SC No. 6(C)(3) PERMIT
 STC No. 28 OP

Description: Failure to comply with the emission control requirements for vacuum trucks.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13(g)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.14(g)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.107a(c)
 5C THSC Chapter 382 382.085(b)
 STC No. 7(E) OP
 STC No. 7(F) OP

Description: Failure to install an applicable CEMS on each separate effluent of an emissions source without the approval to install fewer systems.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1564(a)(5)(ii)
 5C THSC Chapter 382 382.085(b)
 STC No. 1(A) OP

Description: Failure to maintain the inlet velocity to the primary internal cyclones of a catalytic cracking unit catalyst regenerator at or above 20 feet per second.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.112(b)(1)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 STC No. 1(A) OP
 STC No. 27 OP

Description: Failure to place, store, or hold in any storage tank any VOC, unless the storage tank is capable of maintaining working pressure sufficient at all times to prevent any vapor or gas loss to the atmosphere.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 GTCs OP

Description: Failure to report all instances of deviations.

F. Environmental audits:

Notice of Intent Date: 01/15/2018 (1466408)
 No DOV Associated

Notice of Intent Date: 11/30/2018 (1537379)
 Disclosure Date: 06/13/2019

Viol. Classification: Moderate
 Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.658(a)

Description: Failure to set passive monitor locations at the proper height such that the bottom cap of the passive tube is between 4.9 feet and 9.8 feet above ground level.

Viol. Classification: Moderate
 Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.658(c)(1)

Description: Failure to establish adequate number of passive monitors along the fence line, including sufficient siting along shoreline adjacent to the dock area, to meet spacing requirements.

Notice of Intent Date: 09/23/2019 (1602712)
 Disclosure Date: 09/29/2020

Viol. Classification: Moderate
 Citation: 40 CFR Chapter 273, SubChapter I, PT 273, SubPT B 273.13(d)
 40 CFR Chapter 273, SubChapter I, PT 273, SubPT B 273.14(e)
 40 CFR Chapter 273, SubChapter I, PT 273, SubPT B 273.15

Description: Failure to properly manage and dispose of universal waste lamps including properly labeling and dating.
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT J 265.195(b)(1)

Description: Failure to ensure the overfill spill control equipment is clearly identified on the daily inspections of hazardous waste.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to maintain documentation to demonstrate that the Waste Pile was inspected following storm events.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)

Description: Failure to properly maintain aerosol cans.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 335, SubChapter C 335.62

Description: Failure to properly characterize the individual waste streams in the East Plant laboratory at the point of generation to ensure proper management and disposal of each waste stream.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 335, SubChapter C 335.69(d)

Description: Failure ensure waste stored in the East Plant Laboratory is labeled as hazardous waste or with words describing the container contents.
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 268, SubChapter I, PT 268, SubPT A 268.7(a)(7)

Description: Failure to maintain documentation demonstrating how each waste stream meets the exemption or exclusion for each waste managed as such.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 335, SubChapter C 335.62

Description: Failure to ensure waste profiles and waste characterization match waste streams observed in the field.
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 261, SubChapter I, PT 261, SubPT A 261.1(c)
 40 CFR Chapter 261, SubChapter I, PT 261, SubPT A 261.2(c)

Description: Failure to maintain documentation to demonstrate that employees were trained to handle universal waste.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 335, SubChapter A 335.4

Description: Failure to prevent waste blast media from being stored and accumulating on the ground.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)

Description: Failure to prevent waste debris from accumulating on the tarp covering the hazardous waste roll-off at the wash pad.

Notice of Intent Date: 12/03/2019 (1616698)
 No DOV Associated

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

Component Appendices

Appendix A

All NOV's Issued During Component Period 10/25/2016 and 10/25/2021

- 1 Date: 12/02/2016 (1370037) Classification: Moderate
- Self Report? NO For Informational Purposes Only
- Citation: 30 TAC Chapter 335, SubChapter C 335.62
40 CFR Chapter 262, SubChapter I, PT 262, SubPT A 262.11
- Description: Failed to determine if solid waste generated is hazardous pursuant to 30 Administrative Code §335.504 (relating to Hazardous Waste Determination) and to classify any nonhazardous waste under the provisions of 30 Texas Administrative Code Chapter 335 Subchapter R (relating to Waste Classification).
Classification: Moderate
- Self Report? NO For Informational Purposes Only
- Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
30 TAC Chapter 335, SubChapter F 335.152(a)(7)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT I 264.174
PP.II.A.2 Duty to Comply PERMIT
PP.III.D. General Inspection Requirement PERMIT
- Description: Failed to inspect areas where waste containers are stored at least weekly to look for leaking containers or deterioration of containers caused by corrosion or other factors.
Classification: Moderate
- Self Report? NO For Informational Purposes Only
- Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(B)
30 TAC Chapter 335, SubChapter E 335.112(a)(9)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(1)(ii)
40 CFR Chapter 265, SubChapter I, PT 265, SubPT J 265.195
- Description: Failed to inspect, at least once each operating day, a less than 90-day hazardous waste tanks and associated equipment.
Classification: Moderate
- Self Report? NO For Informational Purposes Only
- Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)
30 TAC Chapter 335, SubChapter E 335.112(a)(8)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(1)(i)
40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174
- Description: Failed to inspect areas where waste containers are stored at least weekly to look for leaking containers or deterioration of containers caused by corrosion or other factors.
Classification: Moderate
- Self Report? NO For Informational Purposes Only
- Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
PP Permit Conditions.1.a PERMIT
PP Permit Conditions.2.b PERMIT
- Description: Failed to report to the Executive Director when the permittee becomes aware that it failed to submit any relevant facts in a permit application or submitted incorrect information in an application or in any report to the Executive Director.
- 2 Date: 12/06/2016 (1369116) Classification: Moderate
- Self Report? NO For Informational Purposes Only
- Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
NSR PERMIT
- Description: Failure to prevent visible emissions with opacity greater than twenty percent averaged over six-minute period from emission point number (EPN) F066. Specifically, on January 8, 2015, the Citgo Corpus Christi Plant (Citgo East) released visible emissions with 42 percent opacity from the No. 1 Fluid Catalytic Cracking Unit (FCCU) Regenerator Stack, EPN F066. The event lasted for 30 minutes and was attributed to human error and poor operational procedures.
- 3 Date: 04/18/2017 (1401975) Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 122, SubChapter C 122.217(a)(2)
5C THSC Chapter 382 382.085(b)
Description: Failure to submit, to the executive director, an application for a minor permit revision before a change is operated. Specifically, on August 11, 2010, 17 tanks were removed from Citgo East Plant (FOP 1423) and authorized under NSR 80810 belonging to Citgo West Plant (FOP 1420); Tank Nos. 4001, 4002, 4003, 4004, 5001, 5002, 5003, 5004, 5005, 5006, 5007, and 5008. The following tanks are authorized under PBR 472 but were also required to be removed from FOP 1423; 90-TK-103, 90-TK-104, 90-Tk-105,

4 Date: 04/28/2017 (1389827) Classification: Moderate

Self Report? YES For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Terms & Conditions OP
Special Condition 1 PERMIT
Special Term & Condition 26 OP
Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on December 28, 2016, TCEQ/STEERS Incident No. 249439. Specifically, Citgo Corpus Christi Refinery East Plant released unauthorized emissions in the amount of 12,327 pounds (lbs) of Sulfur Dioxide (SO₂), 10,384.93 lbs of Carbon Monoxide (CO), 1,676.17 lbs of Nitrogen Oxides (NO_x), and 6,014.68 lbs of various other air contaminants.
Classification: Moderate

Self Report? YES For Informational Purposes Only
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Terms & Conditions OP
Special Term & Condition (3)(A)(iv) OP
Description: Failure to prevent visible emissions with opacity greater than a limit of 35 percent (%) averaged over a six-minute period from Emission Point Number (EPN): 31-PR-1. Specifically, Citgo Corpus Christi Refinery East Plant released visible emissions with 59% opacity from 31-PR-1 during an event that was discovered on December 28, 2016, TCEQ/STEERS Incident No. 249439. The opacity event lasted 62 minutes. Opacity was measured by a continuous opacity monitoring system (COMS).

5 Date: 08/15/2017 (1408456) Classification: Moderate

Self Report? YES For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Terms & Conditions OP
Special Condition 4 PERMIT
Special Term & Condition 26 OP
Description: Failure to limit Sulfur Dioxide (SO₂) levels to 250 Parts Per Million by Volume at Dry Conditions (PPMVD) from all applicable sources. Specifically, Citgo - East Plant reported an hourly SO₂ level of 322.14 PPMVD from the Shell Claus Off-Gas Treating Unit (SCOT) Tail Gas Incinerator (TGI) (Emission Point Number [EPN] 412A) on August 13, 2016 from 1400 to 1500 hours.
Classification: Moderate

Self Report? YES For Informational Purposes Only
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
30 TAC Chapter 113, SubChapter C 113.100
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(4)
General Terms & Conditions OP
Special Condition 4 PERMIT
Special Term & Condition 26 OP

Description: Failure to prevent visible emissions from the Cumene Flare (Emission Point Number [EPN]: 446) for more than five minutes in any two- hour period. Specifically, visible emissions were observed from EPN: 446 on April 21, 2016 for 36 minutes, May 21, 2016 for 6 minutes, June 3, 2016 for 18 minutes, and December 28, 2016, for 54 minutes.

Classification: Moderate

Self Report? YES

For Informational Purposes Only

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.643(a)(2)
5C THSC Chapter 382 382.085(b)
General Terms & Conditions OP
Special Condition 9 PERMIT
Special Terms & Conditions 26 OP

Description: Failure to maintain a minimum temperature of 1495 degrees Fahrenheit from the Vapor Combustor (MEC). Specifically, on July 26, 2016 at 1730 hours to July 27, 2016 at 0315 hours, the control temperature fell below the minimum control temperature required, as established through compliance testing for Emissions Point Number (EPN): MEC during the loading of a Gasoline and Cumene barge.

Classification: Moderate

Self Report? YES

For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Terms & Conditions OP
Special Condition10(A)(2) PERMIT
Special Term & Condition 26 OP

Description: Failure to record the vacuum truck exhaust Volatile Organic Compound (VOC) concentration after the Carbon Absorption System (CAS), upon commencing each transfer; and every hour of the CAS run time to determine breakthrough of VOC. Specifically, during various turnaround events in 2016, Citgo - East Plant recorded 202 instances of vacuum truck activity where a record of the CAS run time was not recorded on an hourly basis to determine breakthrough of VOC.

Classification: Moderate

Self Report? YES

For Informational Purposes Only

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.103a(h)
5C THSC Chapter 382 382.085(b)
General Terms & Conditions OP
Special Term & Condition 1A OP

Description: Failure to limit the control of any fuel gas that contains Hydrogen Sulfide (H2S) in excess of 162 Parts Per Million by Volume (PPMV) in the Cumene Flare (Emission Point Number [EPN]: 446). On April 21, 2016 at 1515 hours to April 26, 2016, at 2345 hours and on May 4, 2016 at 0845 hours to May 14, 2016 at 0600 hours, Citgo - East Plant reported that the Cumene Flare was utilized to control fuel gas that exceeded H2S concentrations of 162 PPMV.

Classification: Moderate

Self Report? YES

For Informational Purposes Only

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
5C THSC Chapter 382 382.085(b)
General Terms & Conditions OP
Special Condition 4 PERMIT
Special Term & Condition 26 OP

Description: Failure to maintain a heating value above 300 British Thermal Units per Square Cubic Foot (Btu/SCF) on the Cumene Flare. Specifically, on April 21, 2016, at 1515 hours to April 26, 2016, at 2345 hours and on May 4, 2016, at 0845 hours to May 19, 2016, at 1130 hours, Citgo reported that the Cumene Flare (Emission Point Number [EPN]: 446) experienced a heating value below 300 Btu/SCF.

Classification: Moderate

Self Report? YES

For Informational Purposes Only

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.107a(f)(1)(v)
5C THSC Chapter 382 382.085(b)

Description: General Terms & Conditions OP
Special Term & Condition 1A OP
Failure to perform quarterly visual inspections of all components of the Cumene Flare (Emission Point Number [EPN]: 446) flow monitor. Specifically, Citgo - East Plant failed to perform quarterly visual monitoring for all applicable components of the flow monitor for all four quarters of 2016.
Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Terms & Conditions OP
Special Term & Condition 3 OP

Description: Failure to prevent visible emissions from the MEC Vapor Combustor (Emission Point Number [EPN]: MEC). Specifically, visible emissions were observed from EPN: MEC on December 1, 2016 for 6 minutes.
Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ka 60.113a(a)(1)(iv)
5C THSC Chapter 382 382.085(b)
General Terms & Conditions OP
Special Condition 2 PERMIT
Special Term & Condition 1A OP
Special Term & Condition 26 OP

Description: Failure to submit all 2017 inspection notifications in a timely manner. Specifically, Citgo - East Plant submitted notifications on January 6, 2017, 25 days prior to the inspection of Tank 927 (Emission Point Number [EPN]: TK927), which failed to meet the 30 day notification requirement.

Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 113, SubChapter C 113.1130
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT DDDDD 63.7510(e)
5C THSC Chapter 382 382.085(b)
General Terms & Conditions OP
Special Term & Condition 1A OP
Special Term & Condition 1E OP

Description: Failure to conduct the initial tune-up of the applicable source volcanic heater (Emission Point Number [EPN]: 570-H-1) in a timely manner. Specifically, Citgo - East Plant failed to conduct the initial tune-up by the compliance date of January 31, 2016, as specified by Title 40 Code of Federal Regulation Part 63, Subpart DDDDD.

6 Date: 03/30/2018 (1472209)

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
5C THSC Chapter 382 382.085(b)
NSR #9604A, SC 1 PERMIT

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event.

7 Date: 03/31/2018 (1493677)

Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

8 Date: 01/31/2019 (1559672)

Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)

- 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter
- 9 Date: 02/28/2019 (1559673) Classification: Moderate
 Self Report? YES For Informational Purposes Only
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter
- 10 Date: 03/31/2019 (1571830) Classification: Moderate
 Self Report? YES For Informational Purposes Only
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter
- 11 Date: 05/09/2019 (1557674) Classification: Moderate
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(7)
 40 CFR Chapter 264, SubChapter I, PT 264, SubPT I 264.175(b)(1)
 50160, PP. II.A.2. Duty to Comply PERMIT
 50160, PP. III.D General Inspection Req. PERMIT
 50160, PP. V.B.3 Container Storage Areas PERMIT
 Description: Failed to maintain a base that underlies the containers free of cracks or gaps and sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed.
 Classification: Moderate
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(1)
 40 CFR Chapter 264, SubChapter I, PT 264, SubPT C 264.15(b)(3)
 50160, PP. II.A.2. Duty to Comply PERMIT
 50160, PP. III.D. General Inspection Req PERMIT
 Description: Failed to follow the inspection schedule contained in the permit application submittals identified in Provision I.B. and as set out in Table III.D. Inspection Schedule.
 Classification: Moderate
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 335, SubChapter E 335.112(a)(13)
 40 CFR Chapter 264, SubChapter I, PT 264, SubPT N 264.310(b)(1)
 50160, PP. II.A.2. Duty to Comply PERMIT
 50160, PP. III.D. General Inspection Req PERMIT
 50160, PP. VII.E. Facility Post Closure PERMIT
 Description: Failed to maintain the cover on the equalization basin and oily sludge impoundment, such that the cover promotes drainage, prevents ponding, minimizes surface water infiltration, and minimizes erosion of the cover.
- 12 Date: 05/31/2019 (1583270) Classification: Moderate
 Self Report? YES For Informational Purposes Only
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter
- 13 Date: 06/04/2019 (1436886) Classification: Moderate
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)(i)
 5C THSC Chapter 382 382.085(b)
 GC - 116.115(b)(2)(H)(i) PERMIT
 Description: Failure to prevent visible emissions with opacity greater than a limit of 20%

averaged over a six-minute period from EPN 31-PR-1.

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
GC - 116.115(b)(2)(F) PERMIT
SC No. 1 PERMIT

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on April 22, 2017, TCEQ/STEERS Incident No. 256716.

14 Date: 06/19/2019 (1570011)

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
30 TAC Chapter 101, SubChapter F 101.222(b)(1)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)(i)
5C THSC Chapter 382 382.085(b)

Description: Failure to notify the TCEQ Region 14 Office of an emissions event within 24 hours after the discovery of the event.

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)(i)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
SC No. 3 PERMIT

Description: Failure to prevent visible emissions with opacity greater than a limit of 20% averaged over a six-minute period from EPN F066.

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
SC No. 1 PERMIT

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on April 7, 2018, TCEQ/STEERS Incident No. 281772.

15 Date: 06/30/2019 (1593143)

Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

16 Date: 07/31/2019 (1599489)

Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

17 Date: 08/30/2019 (1581388)

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)

5C THSC Chapter 382 382.085(b)
General Terms & Conditions OP

Description: Failure to report all instances of deviations.

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.120(a)(2)(ii)
5C THSC Chapter 382 382.085(b)
FOP O-01423, Special Term & Condition 22 OP
FOP O-0143, Special Term & Condition 1E OP

Description: Failure to visually inspect the internal floating roof, the seal, gaskets, slotted membranes, and sleeve seals (if any) [...] at least once every 10 years.
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1567(a)(2)
FOP O-01423, Special Term & Condition 1E OP
FOP O-01423, Special Term & Condition 22 OP

Description: Failure to maintain the weekly average chloride level on the sorbent leaving the adsorption system at or below the design or manufacturer's recommended limit (1.8 weight percent for the ChlorsorbTM System).
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1567(c)(1)
5C THSC Chapter 382 382.085(b)
FOP O-01423, Special Term & Condition 1E OP
FOP O-01423, Special Term & Condition 22 OP

Description: Failure to conduct sampling.
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O-01458, Special Term & Condition 24 OP
NSR 2703A, Special Condition 5 PERMIT
NSR Permit 46641, Special Condition 13 PERMIT

Description: Failure to comply with the permitted emissions rates for nitrogen oxides (NOx).
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.103(a)
5C THSC Chapter 382 382.085(b)
FOP 1423, Special Term & Condition 24 OP
NSR 9604A / PSDTX653M1, SC 5 PERMIT

Description: Failure to comply with the permitted emissions rates for carbon monoxide (CO).
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)(i)
5C THSC Chapter 382 382.085(b)
FOP O-01423, Special Term & Condition 24 OP
NSR 3119A, Special Condition 4 PERMIT

Description: Failure to comply with the permitted emissions rates for sulfur dioxide (SO2).
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
5C THSC Chapter 382 382.085(b)

Description: Failure to comply with the 11.4 MMbtu/hr heater duty surrogate limit established in the permit application.
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(1)
5C THSC Chapter 382 382.085(b)
FOP O-01423, Special Term & Condition 26 OP

Description: Failure to maintain an internal floating roof tank such that it shall be floating on the liquid surface at all times.

- Classification: Moderate
- Self Report? YES For Informational Purposes Only
- Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
- Description: Failure to meet the limit for one or more permit parameter
- 19 Date: 09/30/2019 (1613240)
- Classification: Moderate
- Self Report? YES For Informational Purposes Only
- Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
- Description: Failure to meet the limit for one or more permit parameter
- 20 Date: 10/31/2019 (1619054)
- Classification: Moderate
- Self Report? YES For Informational Purposes Only
- Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
- Description: Failure to meet the limit for one or more permit parameter
- 21 Date: 12/31/2019 (1634047)
- Classification: Moderate
- Self Report? YES For Informational Purposes Only
- Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
- Description: Failure to meet the limit for one or more permit parameter
- 22 Date: 05/31/2020 (1666613)
- Classification: Moderate
- Self Report? YES For Informational Purposes Only
- Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
- Description: Failure to meet the limit for one or more permit parameter
- 23 Date: 06/30/2020 (1673570)
- Classification: Moderate
- Self Report? YES For Informational Purposes Only
- Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
- Description: Failure to meet the limit for one or more permit parameter
- 24 Date: 07/27/2020 (1650787)
- Classification: Moderate
- Self Report? NO For Informational Purposes Only
- Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O-01423, Special Term & Condition 26 OP
NR 20156, Special Condition 17B PERMIT
NSR 21303, Special Condition 5 PERMIT
- Description: Failure to comply with permitted TDS limits.
- Classification: Moderate
- Self Report? NO For Informational Purposes Only
- Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.103(a)
5C THSC Chapter 382 382.085(b)
FOP O-01423, Special Term & Condition 26 OP
NSR 9604A/PSDTX653M1 Special Condition 5 PERMIT
- Description: Failure to comply with the permitted emissions rates for carbon monoxide (CO).
- Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
NSR 2703A, Special Condition 5 PERMIT
NSR Permit 46641, Special Condition 13 PERMIT
Description: Failure to comply with the permitted emissions rates for nitrogen oxides (NOx).
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)(i)
5C THSC Chapter 382 382.085(b)
FOP O-01423, Special Term & Condition 26 OP
NSR 3119A, Special Condition 4 PERMIT
Description: Failure to comply with the permitted emissions rates for sulfur dioxide (SO2).
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
5C THSC Chapter 382 382.085(b)
Description: Failure to comply with the heater duty surrogate limit established in the permit application.
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(1)
5C THSC Chapter 382 382.085(b)
FOP O-01423, Special Term & Condition 26 OP
NSR 72654, Special Condition 8 PERMIT
Description: Failure to comply with H2S limits.
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.107a(e)(1)(ii)
Description: Failure to perform a cylinder gas audit (CGA).
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(1)(i)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(2)(iii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(b)(1)
5C THSC Chapter 382 382.085(b)
Description: Failure to maintain an internal floating roof tank such that it shall be floating on the liquid surface at all times.
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 113, SubChapter C 113.100
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(5)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(b)
5C THSC Chapter 382 382.085(b)
FOP O-01423, Special Term & Condition 26 OP
NSR 21358, Special Condition 4 PERMIT
Description: Failure to maintain pilot flame on a flare.
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

FOP O-01423, Special Term & Condition 26 OP
NSR 3119A, Special Condition 1 PERMIT

Description: Failure to comply with permitted oxygen concentration limits.
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O-01423, Special Term & Condition 26 PERMIT
NSR 3119A, Special Condition 1 PERMIT

Description: Failure to comply with permitted temperature limits.
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
FOP O-01423, General Terms & Conditions OP

Description: Failure to report all instances of deviations.

25 Date: 08/28/2020 (1670862)
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Monitoring Requirements No. 7(c) PERMIT

Description: Failed to provide notification of any effluent violation which deviates from the permitted effluent limitation by more than 40%.

26* Date: 12/31/2020 (1712475)
Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

27* Date: 04/30/2021 (1740071)
Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

28* Date: 08/31/2021 (1745039)
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC No. 7 PERMIT
STC No. 28 OP

Description: Failure to comply with the NOx limit of 0.035 lbs/MMBtu at the Charge Heater (EPN 207-H-1).

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC No. 13 PERMIT
STC No. 28 OP

Description: Failure to comply with the NOx limit of 0.045 lbs/MMBtu at the Platformer Reactor Heaters (EPNs 83 and 84).

Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 113, SubChapter C 113.780
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1567(a)(2)
5C THSC Chapter 382 382.085(b)
SC No. 1 PERMIT
STC No. 1(E) OP
STC No. 28 OP
Description: Failure to comply with the Cl2 limit of 0.17 lbs/hr and the HCl limit of 0.024 lbs/hr at the Catalyst Regenerator Vent (EPN 087).
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC No. 1 PERMIT
STC No. 28 OP
Description: Failure to comply with the CO limit of 49.90 lbs/hr at the FCCU 1 Regenerator Stack (EPN F066).
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.103(a)
5C THSC Chapter 382 382.085(b)
PSDTX653M1, SC No. 5 PERMIT
STC No. 1(A) OP
STC No. 28 OP
Description: Failure to comply with the 500 ppm CO limits at the FCCU catalyst regenerators.
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
PSDTX653M1, SC No. 1 PERMIT
STC No. 28 OP
Description: Failure to comply with the CO limits of 287.2 lbs/hr and 287.23 lbs/hr at the No. 2 FCCU Regenerator/ESP Stack (EPN 31-PR-1).
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC No. 2 PERMIT
STC No. 28 OP
Description: Failure to comply with the heater duty limit of 475 MMBtu/hr at the Crude Heater (11-H-1).
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

SC No. 5 PERMIT
 STC No. 2 OP
 Description: Failure to comply with the VOC limit of 3.35 lbs/hr at the Combined Stack for the Crude Heater (11-H-1) and the Vacuum Heater (11-H-2) (EPN 292).
 Classification: Moderate

Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC No. 1 PERMIT
 STC No. 28 OP
 Description: Failure to comply with the CO limit of 0.20 lbs/hr at the SRU Incinerator Stack (EPN 412).
 Classification: Moderate

Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)(i)
 5C THSC Chapter 382 382.085(b)
 SC No. 2 PERMIT
 SC No. 4 PERMIT
 STC No. 1(A) OP
 STC No. 28 OP
 Description: Failure to comply with the hourly and 12-hour rolling 250 ppm CO limits at the SRU Incinerator Stack (EPN 412).
 Classification: Moderate

Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC No. 1 PERMIT
 STC No. 28 OP
 Description: Failure to comply with the CO, NOx, VOC, PM, COS, H2S, and SO2 lbs/hr limits at the SRU Incinerator Stacks (EPNs 412 and 412A). Specifically, Citgo East exceeded the applicable emissions limits a total of 21 times during the certification period of February 20, 2019 through February 19, 2020.
 Refer to the deviation items on page 28 of 50 of the deviation report dated September 18, 2019 and pages 49-50, 52-53, and 58 of 73 of the deviation report dated March 20, 2020.
 Classification: Moderate

Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC No. 12 PERMIT
 STC No. 28 OP
 Description: Failure to comply with the minimum temperature limit of 1,500° F at the vapor combuster, Dock 7 MEC (EPN MEC7).
 Classification: Moderate

Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13(d)(1)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.105(a)(5)(ii)
 5C THSC Chapter 382 382.085(b)
 SC No. 2 PERMIT
 SC No. 7 PERMIT
 STC No. 1(A) OP
 STC No. 28 OP

Description: Failure to perform the daily span calibration of the SO2 continuous emissions

monitoring system (CEMS) at the SRU Incinerator Stack (EPN 412).

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.107a(a)(2)(iii)
5C THSC Chapter 382 382.085(b)
SC No. 4 PERMIT
STC No. 1(A) OP
STC No. 2 OP

Description: Failure to perform a quarterly cylinder gas audit (CGA) for the East Plant Fuel Gas H2S continuous emissions monitoring system (CEMS).

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.485a(b)(2)
5C THSC Chapter 382 382.085(b)
STC No. 1(A) OP

Description: Failure to calculate the calibration drift of LDAR monitoring instruments as required.

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT GGGGG 63.7941
5C THSC Chapter 382 382.085(b)
STC No. 1(A) OP

Description: Failure to replace a carbon cannister within the required timeframe upon discovery of VOC breakthrough.

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC No. 10(A)(5) PERMIT
SC No. 6(C)(3) PERMIT
STC No. 28 OP

Description: Failure to comply with the emission control requirements for vacuum trucks.

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13(g)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.14(g)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.107a(c)
5C THSC Chapter 382 382.085(b)
STC No. 7(E) OP
STC No. 7(F) OP

Description: Failure to install an applicable CEMS on each separate effluent of an emissions source without the approval to install fewer systems.

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1564(a)(5)(ii)
5C THSC Chapter 382 382.085(b)
STC No. 1(A) OP

Description: Failure to maintain the inlet velocity to the primary internal cyclones of a catalytic cracking unit catalyst regenerator at or above 20 feet per second.

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter B 115.112(b)(1)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 STC No. 1(A) OP
 STC No. 27 OP

Description: Failure to place, store, or hold in any storage tank any VOC, unless the storage tank is capable of maintaining working pressure sufficient at all times to prevent any vapor or gas loss to the atmosphere.

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 GTCs OP

Description: Failure to report all instances of deviations.

* NOVs applicable for the Compliance History rating period 9/1/2016 to 8/31/2021

Appendix B
All Investigations Conducted During Component Period October 25, 2016 and October 25, 2021

		(1369728)
Item 1*	October 26, 2016**	For Informational Purposes Only
		(1370457)
Item 2	October 28, 2016**	For Informational Purposes Only
		(1370595)
Item 3	November 09, 2016**	For Informational Purposes Only
		(1370657)
Item 4	November 10, 2016**	For Informational Purposes Only
		(1362677)
Item 5*	November 21, 2016**	For Informational Purposes Only
		(1370037)
Item 6	December 02, 2016**	For Informational Purposes Only
		(1369116)
Item 7	December 06, 2016**	For Informational Purposes Only
		(1362314)
Item 8*	December 09, 2016**	For Informational Purposes Only
		(1390533)
Item 9*	December 15, 2016**	For Informational Purposes Only
		(1397149)
Item 10*	January 11, 2017**	For Informational Purposes Only
		(1388253)
Item 11	January 27, 2017**	For Informational Purposes Only
		(1404032)
Item 12*	February 16, 2017**	For Informational Purposes Only
		(1393856)
Item 13*	February 21, 2017**	For Informational Purposes Only
		(1411133)
Item 14*	March 14, 2017**	For Informational Purposes Only
		(1417636)

Item 15*	April 11, 2017**	For Informational Purposes Only (1401975)
Item 16	April 18, 2017**	For Informational Purposes Only (1425225)
Item 17*	May 10, 2017**	For Informational Purposes Only (1389827)
Item 18	May 17, 2017**	For Informational Purposes Only (1431228)
Item 19*	June 16, 2017**	For Informational Purposes Only (1420602)
Item 20	July 07, 2017**	For Informational Purposes Only (1439837)
Item 21*	July 17, 2017**	For Informational Purposes Only (1423345)
Item 22*	July 21, 2017**	For Informational Purposes Only (1408456)
Item 23	August 15, 2017**	For Informational Purposes Only (1443525)
Item 24*	August 16, 2017**	For Informational Purposes Only (1450152)
Item 25*	September 13, 2017**	For Informational Purposes Only (1428532)
Item 26*	September 27, 2017**	For Informational Purposes Only (1455972)
Item 27*	October 10, 2017**	For Informational Purposes Only (1423975)
Item 28*	October 13, 2017**	For Informational Purposes Only (1461453)
Item 29*	November 16, 2017**	For Informational Purposes Only (1448599)
Item 30*	November 27, 2017**	For Informational Purposes Only (1467832)
Item 31*	December 19, 2017**	For Informational Purposes Only (1474537)
Item 32*	January 18, 2018**	For Informational Purposes Only (1486763)
Item 33*	February 20, 2018**	For Informational Purposes Only (1490440)
Item 34*	March 20, 2018**	For Informational Purposes Only (1474374)
Item 35*	April 09, 2018**	For Informational Purposes Only (1493677)

Item 36	April 20, 2018**	For Informational Purposes Only (1467671)
Item 37*	May 11, 2018**	For Informational Purposes Only (1500595)
Item 38*	May 18, 2018**	For Informational Purposes Only (1489885)
Item 39*	June 13, 2018**	For Informational Purposes Only (1489938)
Item 40*	June 15, 2018**	For Informational Purposes Only (1507712)
Item 41*	June 20, 2018**	For Informational Purposes Only (1497698)
Item 42*	July 10, 2018**	For Informational Purposes Only (1514030)
Item 43*	July 20, 2018**	For Informational Purposes Only (1472209)
Item 44	July 23, 2018**	For Informational Purposes Only (1505514)
Item 45*	July 31, 2018**	For Informational Purposes Only (1483437)
Item 46*	August 13, 2018**	For Informational Purposes Only (1520091)
Item 47*	August 20, 2018**	For Informational Purposes Only (1474386)
Item 48*	August 22, 2018**	For Informational Purposes Only (1511601)
Item 49*	August 23, 2018**	For Informational Purposes Only (1483503)
Item 50*	August 28, 2018**	For Informational Purposes Only (1512865)
Item 51*	August 31, 2018**	For Informational Purposes Only (1513808)
Item 52*	September 17, 2018**	For Informational Purposes Only (1527256)
Item 53*	September 19, 2018**	For Informational Purposes Only (1512375)
Item 54*	October 11, 2018**	For Informational Purposes Only (1533614)
Item 55*	October 18, 2018**	For Informational Purposes Only (1541449)
Item 56*	November 14, 2018**	For Informational Purposes Only

		(1545233)
Item 57*	December 20, 2018**	For Informational Purposes Only
		(1559674)
Item 58*	January 17, 2019**	For Informational Purposes Only
		(1539720)
Item 59	January 30, 2019**	For Informational Purposes Only
		(1559672)
Item 60	February 07, 2019**	For Informational Purposes Only
		(1544752)
Item 61*	March 07, 2019**	For Informational Purposes Only
		(1537701)
Item 62	March 12, 2019**	For Informational Purposes Only
		(1559673)
Item 63	March 20, 2019**	For Informational Purposes Only
		(1571830)
Item 64	April 18, 2019**	For Informational Purposes Only
		(1436881)
Item 65*	May 06, 2019**	For Informational Purposes Only
		(1557674)
Item 66	May 09, 2019**	For Informational Purposes Only
		(1583269)
Item 67*	May 20, 2019**	For Informational Purposes Only
		(1558217)
Item 68*	May 30, 2019**	For Informational Purposes Only
		(1436886)
Item 69	June 04, 2019**	For Informational Purposes Only
		(1570011)
Item 70	June 19, 2019**	For Informational Purposes Only
		(1593143)
Item 71	July 18, 2019**	For Informational Purposes Only
		(1557848)
Item 72*	August 02, 2019**	For Informational Purposes Only
		(1575453)
Item 73*	August 14, 2019**	For Informational Purposes Only
		(1599489)
Item 74	August 15, 2019**	For Informational Purposes Only
		(1576152)
Item 75*	August 30, 2019**	For Informational Purposes Only
		(1606394)
Item 76	September 19, 2019**	For Informational Purposes Only
		(1613240)
Item 77	October 17, 2019**	For Informational Purposes Only

		(1598932)
Item 78	October 24, 2019**	For Informational Purposes Only
		(1619054)
Item 79	November 19, 2019**	For Informational Purposes Only
		(1592698)
Item 80*	November 25, 2019**	For Informational Purposes Only
		(1611913)
Item 81	December 05, 2019**	For Informational Purposes Only
		(1626406)
Item 82*	December 18, 2019**	For Informational Purposes Only
		(1592903)
Item 83*	December 19, 2019**	For Informational Purposes Only
		(1634047)
Item 84	January 20, 2020**	For Informational Purposes Only
		(1640666)
Item 85*	February 18, 2020**	For Informational Purposes Only
		(1631151)
Item 86*	February 20, 2020**	For Informational Purposes Only
		(1631434)
Item 87*	February 21, 2020**	For Informational Purposes Only
		(1625258)
Item 88*	February 23, 2020**	For Informational Purposes Only
		(1647186)
Item 89*	March 17, 2020**	For Informational Purposes Only
		(1653522)
Item 90*	April 16, 2020**	For Informational Purposes Only
		(1638147)
Item 91*	April 23, 2020**	For Informational Purposes Only
		(1660109)
Item 92*	May 14, 2020**	For Informational Purposes Only
		(1650792)
Item 93*	May 20, 2020**	For Informational Purposes Only
		(1645221)
Item 94	May 22, 2020**	For Informational Purposes Only
		(1652251)
Item 95*	June 09, 2020**	For Informational Purposes Only
		(1656852)
Item 96*	June 12, 2020**	For Informational Purposes Only
		(1666613)
Item 97	June 18, 2020**	For Informational Purposes Only
		(1633340)
Item 98*	June 23, 2020**	For Informational Purposes Only

		(1657204)
Item 99*	June 29, 2020**	For Informational Purposes Only
		(1673570)
Item 100	July 16, 2020**	For Informational Purposes Only
		(1650787)
Item 101	July 27, 2020**	For Informational Purposes Only
		(1650791)
Item 102	August 03, 2020**	For Informational Purposes Only
		(1680345)
Item 103*	August 17, 2020**	For Informational Purposes Only
		(1664710)
Item 104*	August 20, 2020**	For Informational Purposes Only
		(1670862)
Item 105	August 28, 2020**	For Informational Purposes Only
		(1672929)
Item 106*	September 11, 2020**	For Informational Purposes Only
		(1686914)
Item 107*	September 16, 2020**	For Informational Purposes Only
		(1678456)
Item 108	October 01, 2020**	For Informational Purposes Only
		(1679594)
Item 109*	October 08, 2020**	For Informational Purposes Only
		(1693261)
Item 110*	October 14, 2020**	For Informational Purposes Only
		(1664744)
Item 111	October 28, 2020**	For Informational Purposes Only
		(1685531)
Item 112*	November 13, 2020**	For Informational Purposes Only
		(1679959)
Item 113*	November 18, 2020**	For Informational Purposes Only
		(1678296)
Item 114*	December 02, 2020**	For Informational Purposes Only
		(1683718)
Item 115*	December 03, 2020**	For Informational Purposes Only
		(1692445)
Item 116*	December 07, 2020**	For Informational Purposes Only
		(1692775)
Item 117*	December 09, 2020**	For Informational Purposes Only
		(1686115)
Item 118*	December 10, 2020**	For Informational Purposes Only
		(1663668)
Item 119	December 14, 2020**	For Informational Purposes Only

		(1712474)
Item 120*	December 17, 2020**	For Informational Purposes Only
		(1685530)
Item 121*	December 23, 2020**	For Informational Purposes Only
		(1692498)
Item 122*	December 28, 2020**	For Informational Purposes Only
		(1692840)
Item 123*	January 14, 2021**	For Informational Purposes Only
		(1712475)
Item 124	January 19, 2021**	For Informational Purposes Only
		(1691451)
Item 125	January 25, 2021**	For Informational Purposes Only
		(1692742)
Item 126*	January 29, 2021**	For Informational Purposes Only
		(1725528)
Item 127*	February 16, 2021**	For Informational Purposes Only
		(1725529)
Item 128*	March 17, 2021**	For Informational Purposes Only
		(1699637)
Item 129	March 19, 2021**	For Informational Purposes Only
		(1725530)
Item 130*	April 19, 2021**	For Informational Purposes Only
		(1704190)
Item 131*	April 23, 2021**	For Informational Purposes Only
		(1704761)
Item 132*	May 06, 2021**	For Informational Purposes Only
		(1697334)
Item 133	May 10, 2021**	For Informational Purposes Only
		(1710873)
Item 134*	May 14, 2021**	For Informational Purposes Only
		(1740071)
Item 135	May 20, 2021**	For Informational Purposes Only
		(1706539)
Item 136*	May 28, 2021**	For Informational Purposes Only
		(1747581)
Item 137*	June 17, 2021**	For Informational Purposes Only
		(1751710)
Item 138*	July 14, 2021**	For Informational Purposes Only
		(1722540)
Item 139*	July 20, 2021**	For Informational Purposes Only
		(1737911)
Item 140*	July 27, 2021**	For Informational Purposes Only

Item 141	August 11, 2021**	(1723238) For Informational Purposes Only
Item 142	August 12, 2021**	(1724501) For Informational Purposes Only
Item 143*	August 19, 2021**	(1757174) For Informational Purposes Only
Item 144	August 23, 2021**	(1590306) For Informational Purposes Only
Item 145*	August 27, 2021**	(1735088) For Informational Purposes Only
Item 146	August 31, 2021**	(1745039) For Informational Purposes Only
Item 147*	September 01, 2021	(1710473) For Informational Purposes Only
Item 148*	September 15, 2021	(1766254) For Informational Purposes Only
Item 149*	October 13, 2021	(1749275) For Informational Purposes Only

* No violations documented during this investigation

**Investigation applicable for the Compliance History Rating period between 09/01/2016 and 08/31/2021.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
CITGO REFINING AND
CHEMICALS COMPANY L.P.
RN102555166**

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**BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY**

AGREED ORDER DOCKET NO. 2021-1085-AIR-E

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding CITGO Refining and Chemicals Company L.P. (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a petroleum refinery located at 1801 Nueces Bay Boulevard in Corpus Christi, Nueces County, Texas (the "Plant"). The Plant consists or consisted of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. HEALTH & SAFETY CODE ch. 382 and the rules of the TCEQ.
3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
4. An administrative penalty in the amount of \$21,150 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$16,920 of the penalty and \$4,230 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.

5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.
7. This Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.

II. ALLEGATIONS

1. During a record review conducted from May 12, 2021 through June 1, 2021, an investigator documented that the Respondent failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review ("NSR") Permit Nos. 2699A, PSDTX36, PSDTX96, PSDTX653M1, and PSDTX831, Special Conditions ("SC") No. 1, Federal Operating Permit ("FOP") No. O1423, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 28, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 713.97 pounds ("lbs") of volatile organic compounds ("VOC"), 566.46 lbs of carbon monoxide ("CO"), 894.95 lbs of sulfur dioxide ("SO₂"), 8.68 lbs of hydrogen sulfide ("H₂S"), and 102.76 lbs of nitrogen oxides ("NO_x") from the Fluor Flare, Emissions Point Number ("EPN") F442, and 403.54 lbs of VOC, 0.13 lb of ammonia, and 1.55 lbs of H₂S as fugitive emissions, during an emissions event (Incident No. 354954) that occurred on April 28, 2021 and lasted five hours and 33 minutes. The emissions event occurred due to a lack of substrate reinforcement, outdated design, and degradation over time for a manual isolation valve that caused a packing leak, resulting in flaring and the release to the atmosphere. Since the emissions event was not caused by a sudden unavoidable breakdown of equipment or process beyond the control of the owner or operator and could have been avoided by better design and/or better operational and maintenance practices, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.
2. During a record review conducted from May 21, 2021 through June 24, 2021, an investigator documented that the Respondent failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 2699A, PSDTX36, PSDTX96, PSDTX653M1, and PSDTX831, SC No. 1, FOP No. O1423, GTC and STC No. 28, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 1,053.15 lbs of VOC, 291.76 lbs of CO, 53.36 lbs of NO_x, 338.60 lbs of SO₂, and 2.65 lbs of H₂S from multiple sources (see Emissions Event Table below), during an emissions event (Incident No. 355167) that occurred on May 2,

2021 and lasted one hour and 45 minutes. The emissions event occurred due to the failure of an improperly-sized clamp that was unable to effectively seal and retain the rope packing, resulting in flaring and the release to the atmosphere. Since the emissions event was not caused by a sudden unavoidable breakdown of equipment or process beyond the control of the owner or operator and could have been avoided by better design and/or better operational and maintenance practices, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.

Emissions Event Table (Incident No. 355167)						
Source Name	EPN	Pollutant (lbs)				
		VOC	CO	NOx	SO2	H2S
Fugitives	N/A	736.45	0.00	0.00	0.00	0.00
Cumene Flare	N/A	49.98	65.36	12.04	44.40	0.39
Fluor Flare	F442	266.72	226.40	41.32	294.20	2.26
Totals:		1,053.15	291.76	53.36	338.60	2.65

N/A = Not applicable

III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: CITGO Refining and Chemicals Company L.P., Docket No. 2021-1085-AIR-E" to:

Financial Administration Division, Revenue Operations Section
 Attention: Cashier's Office, MC 214
 Texas Commission on Environmental Quality
 P.O. Box 13088
 Austin, Texas 78711-3088

2. The Respondent shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Order:
 - i. Implement measures and/or procedures designed to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 354954; and
 - ii. Implement measures and/or procedures designed to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 355167.
 - b. Within 45 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.a. The certification shall be signed by the Respondent and shall include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team
Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

with a copy to:

Air Section Manager
Corpus Christi Regional Office
Texas Commission on Environmental Quality
6300 Ocean Drive, Suite 1200
Corpus Christi, Texas 78412-5839

3. All relief not expressly granted in this Order is denied.
4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Plant operations referenced in this Order.

5. If the Respondent fails to comply with any of the Ordering Provisions in this Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
6. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Order Compliance Team at the address listed above.
7. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
8. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
9. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date



For the Executive Director

5/18/2022

Date

I, the undersigned, have read and understand the attached Order. I am authorized to agree to the attached Order, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this Order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.



Signature

12-1-2021
Date

Jim Cristman
Name (Printed or typed)
Authorized Representative of
CITGO Refining and Chemicals Company L.P.

VP and GM Corpus Christi Refinery
Title

If mailing address has changed, please check this box and provide the new address below: