

Executive Summary – Enforcement Matter – Case No. 61844
CITGO REFINING AND CHEMICALS COMPANY L.P.
RN100238799
Docket No. 2022-0135-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 West Plant, 7350 IH-37, 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: June 13, 2025

Comments Received: No

Penalty Information

Total Penalty Assessed: \$95,475

Amount Deferred for Expedited Settlement: \$19,095

Total Paid to General Revenue: \$76,380

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: October 20, 2021 through November 3, 2021, November 23, 2021 through December 8, 2021, and August 26, 2022 through September 1, 2022

Date(s) of NOE(s): January 14, 2022, February 2, 2022, and September 26, 2022

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Violation Information

1. Failed to comply with the temperature limit. Specifically, the Respondent exceeded the established daily average temperature limit of 298 degrees Fahrenheit ("F"), by a range from 0.20°F to 27.48°F on 24 days from June 25, 2020 to August 18, 2020 for the Continuous Regen Vent, Emissions Point Number ("EPN") EP-1 [30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review ("NSR") Permit Nos. 7741A and PSDTX337M1, Special Conditions ("SC") Nos. 5 and 10, Federal Operating Permit ("FOP") No. O1420, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 20, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

2. Failed to comply with the maximum allowable emissions rate ("MAER"), the concentration limits, and the temperature limit. Specifically, the Respondent exceeded the sulfur dioxide ("SO₂") MAER of 22.39 pounds per hour ("lbs/hr") by a range from 4.26 lb/hr to 81.21 lbs/hr for a total of eight hours on six days from September 25, 2020 to June 13, 2021; exceeded the SO₂ concentration limit of 250 parts per million by volume ("ppmv") by a range from 20.81 ppmv to 1,860.336 ppmv for a total of nine hours on seven days from November 26, 2020 to June 13, 2021, the hydrogen sulfide ("H₂S") concentration limit of 160 parts per million ("ppm") by 1.47 ppm for one hour on April 30, 2021, and the SO₂ 12-hour rolling limit of 250 ppm by a range from 17.88 ppm to 117.13 ppm for a total of 11 hours on June 10, 2021 and June 11, 2021; and did not maintain a minimum firebox exit six-minute average temperature of 1,344°F, with temperatures ranging from 584.83°F to 1,209.56°F for a total of 11 instances on June 10, 2021, for the Sulfur Recovery Unit ("SRU") Tail Gas Incinerator ("TGI"), EPN 554-ME5, resulting in approximately 197.06 lbs of unauthorized SO₂ [30 TEX. ADMIN. CODE §§ 101.20(1) and (3), 116.115(b)(2)(F) and (c), and 122.143(4), 40 CODE OF FEDERAL REGULATIONS ("CFR") § 60.104(a)(2)(i), NSR Permit Nos. 8778A and PSDTX408M3, SC Nos. 1 and 19, NSR Permit Nos. 149680, PSDTX337M1, and PSDTX408M3, SC Nos. 18, 19, and 48.C, FOP No. O1420, GTC and STC Nos. 1.A and 20, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

3. Failed to comply with the emissions limits. Specifically, the Respondent exceeded the established flue gas oxygen ("O₂") content requirement of 2.6 percent ("%") O₂ dry by a range from 1.42% O₂ dry to 8.34% O₂ dry for a total of 12 hours on August 11, 2020 and the established heat input limit of 62.0 million British thermal units per hour ("MMBtu/hr") by a range from 0.01 MMBtu/hr to 33.50 MMBtu/hr for a total of 291 hours on 40 days from July 25, 2020 to June 15, 2021 for Boiler No. 2, EPN 561-B2 [30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(b)(2) and (c), and 122.143(4), NSR Permit Nos. 7741A and PSDTX337M1, General Conditions ("GC") No. 9 and SC No. 11.A, NSR Permit Nos. 149680, PSDTX337M1, and PSDTX408M3, GC No. 9, FOP No. O1420, GTC and STC No. 20, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

4. Failed to maximum O₂ excess operating limit. Specifically, the Respondent exceeded the maximum O₂ excess operating limit of 9.31% by a range from 0.13% O₂ to 10.62% O₂ for a total of 107 hours on seven days from May 14, 2021 to June 5, 2021 for the ULSD Reboiler Heater, EPN 590-H2 [30 TEX. ADMIN. CODE §§ 101.20(1) and 122.143(4),

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40 CFR § 60.107a(c)(6), FOP No. 01420, GTC and STC Nos. 1.A and 20, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

5. Failed to prevent unauthorized emissions. Specifically, the Respondent released 0.01 lb of H₂S and 746.40 lbs of SO₂ from the SRU TGI, EPN 554-ME-5, during an emissions event (Incident No. 368974) that occurred on October 23, 2021 and lasted three hours [30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 149680, PSDTX337M1, and PSDTX408M3, SC No. 1, FOP No. 01420, GTC and STC No. 20, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

6. Failed to comply with the representations with regard to construction plans and operation procedures in a permit application. Specifically, the Respondent represented in the permit application for NSR Permit Nos. 7741A and PSDTX337M1 that the heat input limit for Boiler No. 1, EPN 565-B1, was 86.0 MMBtu/hr, but the heat input limit was exceeded by a range from 0.95 MMBtu/hr to 5.58 MMBtu/hr for a total of five hours on four days from October 13, 2020 to December 14, 2020 [30 TEX. ADMIN. CODE §§ 116.116(a)(1) and 122.143(4), FOP No. 01420, GTC and STC No. 20, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

On November 19, 2020, the Respondent performed a stack test that established a new daily average temperature limit of 350°F for the Continuous Regen Vent, EPN EP-1.

Technical Requirements:

The Order will require the Respondent to:

a. Within 30 days:

- i. Implement measures and/or procedures designed to comply with the SO₂ hourly MAER, the SO₂ and H₂S concentration limits, and the firebox exit six-minute average temperature limit for the SRU TGI, EPN 554-ME5;
- ii. Implement measures and/or procedures designed to comply with the flue gas O₂ content requirement and the heat input limit for Boiler No. 2, EPN 561-B2;
- iii. Implement measures and/or procedures designed to comply with the maximum O₂ excess operating limit for ULSD Reboiler Heater, EPN 590-H2;
- iv. Implement measures and/or procedures designed to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 368974; and

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v. Implement measures and/or procedures designed to comply with the heat input representations for Boiler No. 1, EPN 565-B1.

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

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Johnnie Wu, Enforcement Division, Enforcement Team 2, MC 219, (512) 239-2524; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: J. Ryan Vining, General Manager and Vice President, 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	18-Jan-2022	Screening	21-Jan-2022	EPA Due	
	PCW	6-Feb-2025				

RESPONDENT/FACILITY INFORMATION

Respondent	CITGO REFINING AND CHEMICALS COMPANY L.P.				
Reg. Ent. Ref. No.	RN100238799				
Facility/Site Region	14-Corpus Christi	Major/Minor Source	Major		

CASE INFORMATION

Enf./Case ID No.	61844	No. of Violations	6
Docket No.	2022-0135-AIR-E	Order Type	1660
Media Program(s)	Air	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Johnnie Wu
		EC's Team	Enforcement Team 5
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$82,500
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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	18.0%	Adjustment	Subtotals 2, 3, & 7	\$14,850
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Notes: Enhancement for one NOV with same or similar violations and one order containing a denial of liability. Reduction for three notices of intent to conduct an audit and two disclosures of violation.

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	-\$1,875
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts \$9,730
Estimated Cost of Compliance #NAME?

*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$95,475
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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:

Final Penalty Amount	\$95,475
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$95,475
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DEFERRAL	20.0%	Reduction	Adjustment	-\$19,095
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes:

Deferral offered for expedited settlement.

PAYABLE PENALTY	\$76,380
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Screening Date 21-Jan-2022

Docket No. 2022-0135-AIR-E

PCW

Respondent CITGO REFINING AND CHEMICALS COMPANY L.P.

Policy Revision 5 (January 28, 2021)

Case ID No. 61844

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN100238799

Media Air

Enf. Coordinator Johnnie Wu

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	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	1	20%
	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>)	3	-3%
	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) 18%

>> 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 or similar violations and one order containing a denial of liability. Reduction for three notices of intent to conduct an audit and two disclosures of violation.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 18%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 18%

Screening Date	21-Jan-2022	Docket No.	2022-0135-AIR-E	PCW
Respondent	CITGO REFINING AND CHEMICALS COMPANY L.P.	<i>Policy Revision 5 (January 28, 2021)</i>		
Case ID No.	61844	<i>PCW Revision February 11, 2021</i>		
Reg. Ent. Reference No.	RN100238799			
Media	Air			
Enf. Coordinator	Johnnie Wu			
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. 7741A and PSDTX337M1, Special Conditions ("SC") Nos. 5 and 10, Federal Operating Permit ("FOP") No. O1420, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 20, and Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failed to comply with the temperature limit. Specifically, the Respondent exceeded the established daily average temperature limit of 298 degrees Fahrenheit ("°F") by a range from 0.20°F to 27.48°F on 24 days from June 25, 2020 to August 18, 2020 for the Continuous Regen Vent, Emissions Point Number ("EPN") EP-1.			
		Base Penalty	\$25,000	

>> Environmental, Property and Human Health Matrix

OR		Harm			
	Release	Major	Moderate	Minor	
	Actual			x	Percent 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 that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$17,500

\$7,500

Violation Events

Number of Violation Events	1	24	Number of violation days
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	daily			Violation Base Penalty \$7,500
	weekly			
	monthly			
	quarterly	x		
	semiannual			
	annual			
	single event			

One quarterly event is recommended for the instances of noncompliance that occurred from June 25, 2020 to August 18, 2020.

Good Faith Efforts to Comply	25.0%		Reduction	\$1,875
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	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		

Notes: The Respondent achieved compliance on November 19, 2020, prior to the Notice of Enforcement dated January 14, 2022.

Violation Subtotal \$5,625

Economic Benefit (EB) for this violation	Statutory Limit Test
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Estimated EB Amount	\$161	Violation Final Penalty Total	\$6,975
This violation Final Assessed Penalty (adjusted for limits)			\$6,975

Economic Benefit Worksheet

Respondent CITGO REFINING AND CHEMICALS COMPANY L.P.
Case ID No. 61844
Reg. Ent. Reference No. RN100238799
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)	\$8,000	25-Jun-2020	19-Nov-2020	0.40	\$161	n/a	\$161

Notes for DELAYED costs

Estimated cost to perform a stack test to establish a new daily average temperature limit of 350°F for EPN EP-1. The Date Required is the first date of non-compliance and the Final Date is the 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

\$8,000

TOTAL

\$161

Screening Date	21-Jan-2022	Docket No.	2022-0135-AIR-E	PCW
Respondent	CITGO REFINING AND CHEMICALS COMPANY L.P.		<i>Policy Revision 5 (January 28, 2021)</i>	
Case ID No.	61844	<i>PCW Revision February 11, 2021</i>		
Reg. Ent. Reference No.	RN100238799			
Media	Air			
Enf. Coordinator	Johnnie Wu			
Violation Number	2			
Rule Cite(s)	30 Tex. Admin. Code §§ 101.20(1) and (3), 116.115(b)(2)(F) and (c), and 122.143(4), 40 Code of Federal Regulations ("CFR") § 60.104(a)(2)(i), NSR Permit Nos. 8778A and PSDTX408M3, SC Nos. 1 and 19, NSR Permit Nos. 149680, PSDTX337M1, and PSDTX408M3, SC Nos. 18, 19, and 48.C, FOP No. O1420, GTC and STC Nos. 1.A and 20, and Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failed to comply with the maximum allowable emissions rate ("MAER"), the concentration limits, and the temperature limit. Specifically, the Respondent exceeded the sulfur dioxide ("SO2") MAER of 22.39 pounds per hour ("lbs/hr") by a range from 4.26 lb/hr to 81.21 lbs/hr for a total of eight hours on six days from September 25, 2020 to June 13, 2021; exceeded the SO2 concentration limit of 250 parts per million by volume ("ppmv") by a range from 20.81 ppmv to 1,860.336 ppmv for a total of nine hours on seven days from November 26, 2020 to June 13, 2021, the hydrogen sulfide ("H2S") concentration limit of 160 parts per million ("ppm") by 1.47 ppm for one hour on April 30, 2021, and the SO2 12-hour rolling limit of 250 ppm by a range from 17.88 ppm to 117.13 ppm for a total of 11 hours on June 10, 2021 and June 11, 2021; and did not maintain a minimum firebox exit six-minute average temperature of 1,344°F, with temperatures ranging from 584.83°F to 1,209.56°F for a total of 11 instances on June 10, 2021, for the Sulfur Recovery Unit ("SRU") Tail Gas Incinerator ("TGI"), EPN 554-ME5, resulting in approximately 197.06 lbs of unauthorized SO2.			
			Base Penalty	\$25,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm	Major	Moderate	Minor		
	Actual						
	Potential						
						Percent	30.0%

>> Programmatic Matrix

Matrix Notes	Falsification	Major	Moderate	Minor				
						Percent	0.0%	
Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.						Adjustment	\$17,500	
								\$7,500

Violation Events

Number of Violation Events	3	9	Number of violation days
<div style="display: flex; flex-direction: column; align-items: flex-start;"> <div style="background-color: #d9e1f2; padding: 2px 5px; margin-bottom: 2px;">daily</div> <div style="background-color: #d9e1f2; padding: 2px 5px; margin-bottom: 2px;">weekly</div> <div style="background-color: #d9e1f2; padding: 2px 5px; margin-bottom: 2px;">monthly</div> <div style="background-color: #d9e1f2; padding: 2px 5px; margin-bottom: 2px;">quarterly</div> <div style="background-color: #d9e1f2; padding: 2px 5px; margin-bottom: 2px;">semiannual</div> <div style="background-color: #d9e1f2; padding: 2px 5px; margin-bottom: 2px;">annual</div> <div style="background-color: #d9e1f2; padding: 2px 5px;">single event</div> </div>	<div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%; text-align: center;">x</div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div>		
			Violation Base Penalty
			\$22,500

Three quarterly events are recommended for the instances of noncompliance that occurred from September 25, 2020 to June 13, 2021.

Good Faith Efforts to Comply

	0.0%	
		Reduction
		\$0
Extraordinary Ordinary N/A	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
Notes	The Respondent does not meet the good faith criteria for this violation.	
		Violation Subtotal
		\$22,500

Economic Benefit (EB) for this violation

Estimated EB Amount	\$2,300	Statutory Limit Test	
		Violation Final Penalty Total	\$26,550
This violation Final Assessed Penalty (adjusted for limits)			\$26,550

Economic Benefit Worksheet

Respondent CITGO REFINING AND CHEMICALS COMPANY L.P.
Case ID No. 61844
Reg. Ent. Reference No. RN100238799
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	25-Sep-2020	1-May-2025	4.60	\$2,300	n/a	\$2,300
Notes for DELAYED costs				Estimated cost to implement measures and/or procedures designed to comply with the SO2 hourly MAER, the SO2 and H2S concentration limits, and the firebox exit six-minute average temperature limit for the SRU TGI, EPN 554-ME5. The Date Required is the initial date of noncompliance 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 \$2,300

Screening Date 21-Jan-2022 Respondent CITGO REFINING AND CHEMICALS COMPANY L.P. Case ID No. 61844 Reg. Ent. Reference No. RN100238799 Media Air Enf. Coordinator Johnnie Wu	Docket No. 2022-0135-AIR-E <div style="text-align: right;"> <i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i> </div>	PCW
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Violation Number	3	
Rule Cite(s)		30 Tex. Admin. Code §§ 101.20(3), 116.115(b)(2) and (c), and 122.143(4), NSR Permit Nos. 7741A and PSDTX337M1, General Conditions ("GC") No. 9 and SC No. 11.A, NSR Permit Nos. 149680, PSDTX337M1, and PSDTX408M3, GC No. 9, FOP No. O1420, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b)
Violation Description		Failed to comply with the emissions limits. Specifically, the Respondent exceeded the established flue gas oxygen ("O2") content requirement of 2.6 percent ("%") O2 dry by a range from 1.42% O2 dry to 8.34% O2 dry for a total of 12 hours on August 11, 2020 and the established heat input limit of 62.0 million British thermal units per hour ("MMBtu/hr") by a range from 0.01 MMBtu/hr to 33.50 MMBtu/hr for a total of 291 hours on 40 days from July 25, 2020 to June 15, 2021 for Boiler No. 2, EPN 561-B2.

Base Penalty	\$25,000
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>> Environmental, Property and Human Health Matrix

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

>> Programmatic Matrix

Matrix Notes	Falsification	Major	Moderate	Minor	
					Percent 0.0%
	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.				
					Adjustment \$17,500

Adjustment	\$17,500
Subtotal	\$7,500

Violation Events

Number of Violation Events	4	41	Number of violation days
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	daily			
	weekly			
	monthly			
	quarterly	x		Violation Base Penalty \$30,000
	semiannual			
	annual			
	single event			

Four quarterly events are recommended for the instances of noncompliance that occurred from July 25, 2020 to June 15, 2021.	
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Good Faith Efforts to Comply

	0.0%	
	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	\$30,000

Economic Benefit (EB) for this violation

	Statutory Limit Test
Estimated EB Amount	\$2,385
	Violation Final Penalty Total
	\$35,400
This violation Final Assessed Penalty (adjusted for limits)	
\$35,400	

Economic Benefit Worksheet

Respondent CITGO REFINING AND CHEMICALS COMPANY L.P.
Case ID No. 61844
Reg. Ent. Reference No. RN100238799
Media Air
Violation No. 3

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	25-Jul-2020	1-May-2025	4.77	\$2,385	n/a	\$2,385

Notes for DELAYED costs

Estimated cost to implement measures and/or procedures designed to comply with the flue gas O2 content requirement and the heat input limit for Boiler No. 2, EPN 561-B2. The Date Required is the date of non-compliance 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

\$2,385

Screening Date	21-Jan-2022	Docket No.	2022-0135-AIR-E	PCW
Respondent	CITGO REFINING AND CHEMICALS COMPANY L.P.			
Case ID No.	61844	<i>Policy Revision 5 (January 28, 2021)</i>		
Reg. Ent. Reference No.	RN100238799	<i>PCW Revision February 11, 2021</i>		
Media	Air			
Enf. Coordinator	Johnnie Wu			
Violation Number	4			
Rule Cite(s)	30 Tex. Admin. Code §§ 101.20(1) and 122.143(4), 40 CFR § 60.107a(c)(6), FOP No. 01420, GTC and STC Nos. 1.A and 20, and Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failed to comply with the maximum O2 excess operating limit. Specifically, the Respondent exceeded the maximum O2 excess operating limit of 9.31% by a range from 0.13% O2 to 10.62% O2 for a total of 107 hours on seven days from May 14, 2021 to June 5, 2021 for the ULSD Reboiler Heater, EPN 590-H2.			
Base Penalty				\$25,000

>> Environmental, Property and Human Health Matrix

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

>> Programmatic Matrix

Matrix Notes	Falsification	Major	Moderate	Minor	Percent
0.0%					
Adjustment \$17,500					

\$7,500

Violation Events

Number of Violation Events	1	7	Number of violation days
daily			
weekly			
monthly	x		
quarterly			
semiannual			
annual			
single event			
Violation Base Penalty			
\$7,500			
One monthly event is recommended for the instances of noncompliance that occurred from May 14, 2021 to June 5, 2021.			

Good Faith Efforts to Comply

	0.0%	
	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

Estimated EB Amount	Statutory Limit Test
\$1,984	Violation Final Penalty Total
	\$8,850
This violation Final Assessed Penalty (adjusted for limits)	
\$8,850	

Economic Benefit Worksheet

Respondent CITGO REFINING AND CHEMICALS COMPANY L.P.
Case ID No. 61844
Reg. Ent. Reference No. RN100238799
Media Air
Violation No. 4

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	14-May-2021	1-May-2025	3.97	\$1,984	n/a	\$1,984
Notes for DELAYED costs	Estimated cost to implement measures and/or procedures designed to comply with the maximum O2 excess operating limit for ULSD Reboiler Heater, EPN 590-H2. The Date Required is the first date of non-compliance 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 \$1,984

Screening Date 21-Jan-2022 Respondent CITGO REFINING AND CHEMICALS COMPANY L.P. Case ID No. 61844 Reg. Ent. Reference No. RN100238799 Media Air Enf. Coordinator Johnnie Wu	Docket No. 2022-0135-AIR-E Base Penalty \$25,000	PCW <i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>
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Violation Number	5	Rule Cite(s)	
		30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit No. 149680, PSDTX337M1, and PSDTX408M3, SC No. 1, FOP No. 01420, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b)	
Violation Description		Failed to prevent unauthorized emissions. Specifically, the Respondent released 0.01 lb of H2S and 746.40 lbs of SO2 from the SRU TGI, EPN 554-ME-5, during an emissions event (Incident No. 368974) that occurred on October 23, 2021 and lasted three hours.	

Base Penalty				\$25,000
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>> Environmental, Property and Human Health Matrix

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

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
				Percent	0.0%

Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.
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Adjustment	\$17,500
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	\$7,500
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Violation Events

Number of Violation Events	1		1	Number of violation days
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	daily				
	weekly				
	monthly	x			
	quarterly				
	semiannual				
	annual				
	single event				

Violation Base Penalty	\$7,500
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One monthly event is recommended.	
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Good Faith Efforts to Comply

	0.0%				
	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
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Economic Benefit (EB) for this violation

Estimated EB Amount	\$1,762	Statutory Limit Test	
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Violation Final Penalty Total	\$8,850
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This violation Final Assessed Penalty (adjusted for limits)	\$8,850
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Economic Benefit Worksheet

Respondent CITGO REFINING AND CHEMICALS COMPANY L.P.
Case ID No. 61844
Reg. Ent. Reference No. RN100238799
Media Air
Violation No. 5

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	23-Oct-2021	1-May-2025	3.52	\$1,762	n/a	\$1,762
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. 368974. 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	\$1,762
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Screening Date 21-Jan-2022 Respondent CITGO REFINING AND CHEMICALS COMPANY L.P. Case ID No. 61844 Reg. Ent. Reference No. RN100238799 Media Air Enf. Coordinator Johnnie Wu	Docket No. 2022-0135-AIR-E PCW <i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>	
Violation Number 6		
Rule Cite(s) 30 Tex. Admin. Code §§ 116.116(a)(1) and 122.143(4), FOP No. 01420, GTC and STC No. 20, and Tex. Health & Safety Code § 382.085(b)		
Violation Description Failed to comply with the with the representations with regard to construction plans and operation procedures in a permit application. Specifically, the Respondent represented in the permit application for NSR Permit Nos. 7741A and PSDTX337M1 that the heat input limit for Boiler No. 1, EPN 565-B1, was 86.0 MMBtu/hr, but the heat input limit was exceeded by a range from 0.95 MMBtu/hr to 5.58 MMBtu/hr for a total of five hours on four days from October 13, 2020 to December 14, 2020.		
Base Penalty		\$25,000
>> Environmental, Property and Human Health Matrix		
OR	Release	Harm
		Major Moderate Minor
	Actual	x
	Potential	
Percent		30.0%
>> Programmatic Matrix		
	Falsification Major Moderate Minor	
Percent		0.0%
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.	
Adjustment		\$17,500
		\$7,500
Violation Events		
Number of Violation Events 1		4 Number of violation days
	daily	
	weekly	
	monthly	
	quarterly	x
	semiannual	
	annual	
	single event	
Violation Base Penalty		\$7,500
One quarterly event is recommended for the instances of noncompliance that occurred from October 13, 2020 to December 14, 2020.		
Good Faith Efforts to Comply		
0.0%		Reduction
Before NOE/NOV NOE/NOV to EDRP/Settlement Offer		\$0
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	\$1,138	Violation Final Penalty Total
		\$8,850
This violation Final Assessed Penalty (adjusted for limits)		\$8,850

Economic Benefit Worksheet

Respondent CITGO REFINING AND CHEMICALS COMPANY L.P.
Case ID No. 61844
Reg. Ent. Reference No. RN100238799
Media Air
Violation No. 6

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)	\$5,000	13-Oct-2020	1-May-2025	4.55	\$1,138	n/a	\$1,138
Notes for DELAYED costs	Estimated cost to implement measures and/or procedures designed to comply with the heat input representations for Boiler No. 1, EPN 565-B1. The Date Required is the first date of non-compliance 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 \$5,000

TOTAL \$1,138



Compliance History Report

Compliance History Report for CN600127922, RN100238799, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

Customer, Respondent, or Owner/Operator:	CN600127922, CITGO REFINING AND CHEMICALS COMPANY L.P.	Classification: SATISFACTORY	Rating: 5.04
Regulated Entity:	RN100238799, CITGO CORPUS CHRISTI REFINERY WEST PLANT	Classification: SATISFACTORY	Rating: 3.16
Complexity Points:	20	Repeat Violator:	NO
CH Group:	02 - Oil and Petroleum Refineries		
Location:	7350 IH 37 CORPUS CHRISTI, TX 78409-2812, NUECES COUNTY		
TCEQ Region:	REGION 14 - CORPUS CHRISTI		

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER NE0192F

AIR NEW SOURCE PERMITS ACCOUNT NUMBER NE0192F

AIR NEW SOURCE PERMITS REGISTRATION 170246

AIR NEW SOURCE PERMITS PERMIT 80810

AIR NEW SOURCE PERMITS REGISTRATION 138835

AIR NEW SOURCE PERMITS REGISTRATION 139778

AIR NEW SOURCE PERMITS REGISTRATION 134875

AIR NEW SOURCE PERMITS REGISTRATION 134879

AIR NEW SOURCE PERMITS PERMIT AMOC52

AIR NEW SOURCE PERMITS EPA PERMIT PSDTX337M1

AIR NEW SOURCE PERMITS REGISTRATION 148016

AIR NEW SOURCE PERMITS REGISTRATION 146216

AIR NEW SOURCE PERMITS PERMIT AMOC69

AIR NEW SOURCE PERMITS REGISTRATION 155086

AIR NEW SOURCE PERMITS REGISTRATION 155603

AIR NEW SOURCE PERMITS REGISTRATION 168536

AIR NEW SOURCE PERMITS REGISTRATION 168104

AIR NEW SOURCE PERMITS REGISTRATION 175885

WASTEWATER PERMIT TXG670386

POLLUTION PREVENTION PLANNING ID NUMBER P00138

INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 33763

AIR OPERATING PERMITS PERMIT 1420

AIR NEW SOURCE PERMITS EPA PERMIT PSDTX408M3

AIR NEW SOURCE PERMITS AFS NUM 4835500115

AIR NEW SOURCE PERMITS REGISTRATION 108020

AIR NEW SOURCE PERMITS REGISTRATION 117179

AIR NEW SOURCE PERMITS REGISTRATION 113569

AIR NEW SOURCE PERMITS REGISTRATION 133911

AIR NEW SOURCE PERMITS REGISTRATION 150967

AIR NEW SOURCE PERMITS EPA PERMIT PSDTX337

AIR NEW SOURCE PERMITS REGISTRATION 168898

AIR NEW SOURCE PERMITS PERMIT 149680

AIR NEW SOURCE PERMITS REGISTRATION 150757

AIR NEW SOURCE PERMITS REGISTRATION 151100

AIR NEW SOURCE PERMITS REGISTRATION 160981

AIR NEW SOURCE PERMITS REGISTRATION 156155

AIR NEW SOURCE PERMITS REGISTRATION 175606

AIR NEW SOURCE PERMITS REGISTRATION 172341

IHW CORRECTIVE ACTION SOLID WASTE

REGISTRATION # (SWR) 33763

AIR EMISSIONS INVENTORY ACCOUNT NUMBER NE0192F

INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD981153711

INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50353

Compliance History Period: September 01, 2019 to August 31, 2024 **Rating Year:** 2024 **Rating Date:** 09/01/2024

Date Compliance History Report Prepared: December 16, 2024

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: December 16, 2019 to December 16, 2024

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

Name: Johnnie Wu

Phone: (512) 239-2524

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: 07/06/2020 ADMINORDER 2019-1571-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
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)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: Special Condition 1 PERMIT
Special Term & Condition 15 OP
Description: Failure to prevent unauthorized emissions to the atmosphere.
Classification: Moderate
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)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: SC 1 OP
SC1 OP
STC 15 OP
Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event discovered on May 17, 2019, TCEQ/STEERS Incident No. 308770.
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: STC 3.F OP
Description: Failure to notify the TCEQ Corpus Christi Office within 24-hours after discovery of an emissions 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	January 06, 2020	(1612261)
Item 2	January 28, 2020	(1618887)
Item 3	February 20, 2020	(1631148)
Item 4	May 18, 2020	(1645840)
Item 5	June 08, 2020	(1652257)
Item 6	August 03, 2020	(1665621)
Item 7	August 06, 2020	(1665491)
Item 8	August 07, 2020	(1666372)
Item 9	August 20, 2020	(1664711)
Item 10	September 11, 2020	(1672926)
Item 11	October 09, 2020	(1677998)
Item 12	December 04, 2020	(1692499)
Item 13	May 06, 2021	(1704744)
Item 14	May 20, 2021	(1709520)
Item 15	July 13, 2021	(1738757)
Item 16	August 16, 2021	(1755174)
Item 17	September 01, 2021	(1760477)
Item 18	April 01, 2022	(1788662)
Item 20	September 30, 2022	(1846056)
Item 21	December 13, 2022	(1862315)
Item 22	February 03, 2023	(1861026)
Item 24	October 02, 2023	(1924750)
Item 25	April 05, 2024	(1902965)
Item 26	July 15, 2024	(1989092)
Item 27	September 18, 2024	(2008806)

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: 02/09/2024 (1938554)	
Self Report?	YES	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 60.482-2a(a)(1) 5C THSC Chapter 382 382.085(b) STC 1A PERMIT	
Description:	Failure to conduct monthly leak detection and repair (LDAR) inspections for pumps in light liquid service.	
Self Report?	YES	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 60.482-7a(c)(1)(i) 5C THSC Chapter 382 382.085(b) STC 1(A) OP	
Description:	Failure to conduct quarterly LDAR inspections for 79 valves in light liquid service.	
Self Report?	YES	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 60.482-7a(a)(1) 5C THSC Chapter 382 382.085(b) STC 1(A) OP	
Description:	Failure to conduct monthly LDAR inspections for 97 valves in light liquid service.	
Self Report?	YES	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 60.482-6a(a)(1) 5C THSC Chapter 382 382.085(b) STC 1(A) OP	
Description:	Failure to equip each open-ended valve or line with a cap, blind flange, plug, or a second valve.	
Self Report?	YES	Classification: Moderate
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 68, SubChapter C, PT 68, SubPT D 68.69(a) 5C THSC Chapter 382 382.085(b) STC 25 OP	
Description:	Failure to develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information.	
Self Report?	YES	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 Kb 60.113b(a)(2) 5C THSC Chapter 382 382.085(b) STC 1(A) OP	
Description:	Failure to take tanks out of service within the initial 45 days after discovering an issue with the floating roofs or within the 30 day extension.	
Self Report?	YES	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 Kb 60.113b(a)(2) 5C THSC Chapter 382 382.085(b) STC 1(A) OP	
Description:	Failure to take tanks out of service within the initial 45 days after discovering an issue with the floating roofs and/or within the 30 day extension.	
Self Report?	YES	Classification: Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2)(A) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(a)(4) 5C THSC Chapter 382 382.085(b) STC 25 OP	
Description:	Failure to conduct the 5-year inspection for an external floating roof (EFR) tank as required.	
Self Report?	YES	Classification: Moderate
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) 5C THSC Chapter 382 382.085(b)	

SC 46(B) OP
STC 20 OP

Description: Failure to conduct a stack test within 60 days of the notifications as required.
Self Report? YES Classification: Moderate
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 63, SubChapter C, PT 63, SubPT CC 63.670(c)
5C THSC Chapter 382 382.085(b)
SC 3 OP
STC 1(A) OP
STC 20 OP

Description: Failure to prevent visible emissions from a flare for more than five minutes in any two-hour period.
Self Report? YES Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 113, SubChapter C 113.100
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(2)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.640(n)(8)
5C THSC Chapter 382 382.085(b)
STC 1(A) OP

Description: Failure to maintain each opening in the external floating roof (EFR) of a tank in a closed position.
Self Report? YES Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
5C THSC Chapter 382 382.085(b)
STC 1(A) OP

Description: Failure to conduct quarterly LDAR inspections for closed-vent systems and control devices.
Self Report? YES Classification: Moderate
Citation: 30 TAC Chapter 113, SubChapter C 113.100
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(e)
5C THSC Chapter 382 382.085(b)
STC 1(A) OP

Description: Failure to maintain the net heating value of flare combustion zone gas (NHVcz) at or above 270 British thermal units per standard cubic feet (Btu/scf).
Self Report? YES Classification: Moderate
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)
5C THSC Chapter 382 382.085(b)
SC 1 OP
STC 1(A) OP
STC 20 OP

Description: Failure to operate in compliance with Maximum Allowable Emissions Rate Table (MAERT) limits.
Self Report? YES Classification: Moderate
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)
5C THSC Chapter 382 382.085(b)
SC 1 OP
STC 20 OP

Description: Failure to operate in compliance with Maximum Allowable Emissions Rate Table (MAERT) limits.
Self Report? YES Classification: Moderate
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)
5C THSC Chapter 382 382.085(b)
SC 14(C) OP
STC 20 OP

Description: Failure to maintain at least three days of holdup (excess) capacity of total sour water storage.
Self Report? YES Classification: Moderate
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)

5C THSC Chapter 382 382.085(b)
 SC 1 OP
 STC 20 OP
 Description: Failure to comply with Maximum Allowable Emissions Rate Table (MAERT) limits.
 Self Report? YES Classification: Moderate
 Citation: 30 TAC Chapter 113, SubChapter C 113.100
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.671(a)(1)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1572(c)(1)
 5C THSC Chapter 382 382.085(b)
 STC 1(A) OP
 Description: Failure to perform quarterly checks and annual calibrations for fuel flow meters and the continuous parameter monitoring system (CPMS).

F. Environmental audits:

Notice of Intent Date: 09/23/2019 (1602715)
 Disclosure Date: 09/29/2020
 Viol. Moderate
 Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(3)
 Description: Failure to label the hazardous waste tank at the West Plant 588 TK6019 as hazardous waste.
 Viol. Moderate
 Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.173(a)
 Description: Failure to maintain the can puncturing attachment on the aerosol can drum located in the West Plant machine shop in a closed position when not in use.
 Viol. Moderate
 Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)
 Description: Failure to properly manage aerosol cans.
 Viol. Moderate
 Citation: 40 CFR Chapter 266, SubChapter I, PT 266, SubPT O 268.7(a)(7)
 Description: Failure to demonstrate have each waste stream meets the exemption or exclusion claimed.
 Viol. Moderate
 Citation: 40 CFR Chapter 261, SubChapter I, PT 261, SubPT A 261.2(c)
 Description: Failure to demonstrate that employees have been trained on universal waste management.
 Notice of Intent Date: 06/14/2021 (1739063)
 Disclosure Date: 01/12/2022
 Viol. Moderate
 Citation: 30 TAC Chapter 115, SubChapter B 115.136(b)
 30 TAC Chapter 115, SubChapter B 115.136(b)(1)
 30 TAC Chapter 115, SubChapter B 115.136(b)(2)
 30 TAC Chapter 115, SubChapter B 115.136(b)(3)
 30 TAC Chapter 115, SubChapter B 115.136(b)(4)
 Description: Failed to maintain records for the exemption in the CITGO West Plant Title V permit that indicates that the CPI separator meets the 1.5 psia exemption criteria for 30 TAC 115.137(b)(3).
 Disclosure Date: 07/12/2022
 Viol. Moderate
 Classification:
 Citation: 30 TAC Chapter 101, SubChapter A 101.10(a)
 Description: Failed to report emissions associated with the fugitive components in the WWTP in the annual emissions inventory as the components were not included in LDAR database counts, accounting for approximately 4.98 tons per year for the fugitive components.
 Notice of Intent Date: 11/09/2021 (1803617)
 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

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
CITGO REFINING AND CHEMICALS
COMPANY L.P.
RN100238799

§ BEFORE THE
§ TEXAS COMMISSION ON
§ ENVIRONMENTAL QUALITY
§

AGREED ORDER DOCKET NO. 2022-0135-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 7350 Interstate Highway 37 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 \$95,475 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$76,380 of the penalty and \$19,095 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.
9. The Executive Director recognizes that on November 19, 2020, the Respondent performed a stack test that established a new daily average temperature limit of 350 degrees Fahrenheit ("F") for the Continuous Regen Vent, Emissions Point Number ("EPN") EPN EP-1.

II. ALLEGATIONS

1. During an investigation for the Plant conducted from October 20, 2021 through November 3, 2021, an investigator documented that the Respondent:
 - a. Failed to comply with the temperature limit, in violation of 30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review ("NSR") Permit Nos. 7741A and PSDTX337M1, Special Conditions ("SC") Nos. 5 and 10, Federal Operating Permit ("FOP") No. O1420, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 20, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent exceeded the established daily average temperature limit of 298°F, by a range from 0.20°F to 27.48°F on 24 days from June 25, 2020 to August 18, 2020 for the Continuous Regen Vent, EPN EP-1.
 - b. Failed to comply with the maximum allowable emissions rate ("MAER"), the concentration limits, and the temperature limit, in violation of 30 TEX. ADMIN. CODE §§ 101.20(1) and (3), 116.115(b)(2)(F) and (c), and 122.143(4), 40 CODE OF FEDERAL REGULATIONS ("CFR") § 60.104(a)(2)(i), NSR Permit Nos. 8778A and PSDTX408M3, SC Nos. 1 and 19, NSR Permit Nos. 149680, PSDTX337M1, and PSDTX408M3, SC Nos. 18, 19, and 48.C, FOP No. O1420, GTC and STC Nos. 1.A and 20, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent exceeded the sulfur dioxide ("SO₂") MAER of 22.39 pounds per hour ("lbs/hr") by a range from 4.26 lb/hr to 81.21 lbs/hr for a total of eight hours on six days from September 25, 2020 to June 13, 2021; exceeded the SO₂ concentration limit of 250 parts per million by volume ("ppmv") by a range from 20.81 ppmv to 1,860.336 ppmv for a total of nine hours on seven days from November 26, 2020 to June 13, 2021, the hydrogen sulfide ("H₂S") concentration limit of 160 parts per million ("ppm") by 1.47 ppm for one hour on April 30, 2021, and the SO₂ 12-hour rolling limit of 250 ppm by a range from 17.88 ppm to 117.13 ppm for a total of 11 hours on June 10, 2021 and June 11, 2021; and did not maintain a minimum firebox exit six-minute average temperature of 1,344°F, with temperatures ranging from 584.83°F to 1,209.56°F for a total of 11 instances on June 10, 2021, for the Sulfur Recovery Unit ("SRU") Tail Gas Incinerator ("TGI"), EPN 554-ME5, resulting in approximately 197.06 lbs of unauthorized SO₂.

- c. Failed to comply with the emissions limits, in violation of 30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(b)(2) and (c), and 122.143(4), NSR Permit Nos. 7741A and PSDTX337M1, General Conditions ("GC") No. 9 and SC No. 11.A, NSR Permit Nos. 149680, PSDTX337M1, and PSDTX408M3, GC No. 9, FOP No. 01420, GTC and STC No. 20, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent exceeded the established flue gas oxygen ("O₂") content requirement of 2.6 percent ("%") O₂ dry by a range from 1.42% O₂ dry to 8.34% O₂ dry for a total of 12 hours on August 11, 2020 and the established heat input limit of 62.0 million British thermal units per hour ("MMBtu/hr") by a range from 0.01 MMBtu/hr to 33.50 MMBtu/hr for a total of 291 hours on 40 days from July 25, 2020 to June 15, 2021 for Boiler No. 2, EPN 561-B2.
 - d. Failed to comply with the maximum O₂ excess operating limit, in violation of 30 TEX. ADMIN. CODE §§ 101.20(1) and 122.143(4), 40 CFR § 60.107a(c)(6), FOP No. 01420, GTC and STC Nos. 1.A and 20, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent exceeded the maximum O₂ excess operating limit of 9.31% by a range from 0.13% O₂ to 10.62% O₂ for a total of 107 hours on seven days from May 14, 2021 to June 5, 2021 for the ULSD Reboiler Heater, EPN 590-H2.
2. During a record review for the Plant conducted from November 23, 2021 through December 8, 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. 149680, PSDTX337M1, and PSDTX408M3, SC No. 1, FOP No. 01420, GTC and STC No. 20, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 0.01 lb of H₂S and 746.40 lbs of SO₂ from the SRU TGI, EPN 554-ME-5, during an emissions event (Incident No. 368974) that occurred on October 23, 2021 and lasted three hours.
3. During a record review for the Plant conducted from August 26, 2022 through September 1, 2022, an investigator documented that the Respondent failed to comply with the with the representations with regard to construction plans and operation procedures in a permit application, in violation of 30 TEX. ADMIN. CODE §§ 116.116(a)(1) and 122.143(4), FOP No. 01420, GTC and STC No. 20, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent represented in the permit application for NSR Permit Nos. 7741A and PSDTX337M1 that the heat input limit for Boiler No. 1, EPN 565-B1, was 86.0 MMBtu/hr, but the heat input limit was exceeded by a range from 0.95 MMBtu/hr to 5.58 MMBtu/hr for a total of five hours on four days from October 13, 2020 to December 14, 2020.

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. 2022-0135-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 for the Plant:
 - a. Within 30 days after the effective date of this Order:
 - i. Implement measures and/or procedures designed to comply with the SO₂ hourly MAER, the SO₂ and H₂S concentration limits, and the firebox exit six-minute average temperature limit for the SRU TGI, EPN 554-ME5;
 - ii. Implement measures and/or procedures designed to comply with the flue gas O₂ content requirement and the heat input limit for Boiler No. 2, EPN 561-B2;
 - iii. Implement measures and/or procedures designed to comply with the maximum O₂ excess operating limit for ULSD Reboiler Heater, EPN 590-H2;
 - iv. Implement measures and/or procedures designed to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 368974; and
 - v. Implement measures and/or procedures designed to comply with the heat input representations for Boiler No. 1, EPN 565-B1.
 - 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:

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
500 North Shoreline Boulevard, Suite 500
Corpus Christi, Texas 78401

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. 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 Enforcement Division at the address listed above.
6. 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.
7. 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.

8. 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



07/16/2025

For the Executive Director

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 OAG 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 OAG 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

4/29/25

Date

J. Ryan Vining

VP and GM Corpus Christi Refinery

Name (Printed or typed)

Title

Authorized Representative of

CITGO REFINING AND CHEMICALS COMPANY L.P.

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

Instructions: Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.