

February 23, 2006

Via Certified Mail
Administrator Stephen Johnson
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Petition for objection on CITGO Refining and Chemicals Company's draft permit for operation of Corpus Christ Refinery-West Plant: RN100238799, Permit No. O1420

Dear Administrator Johnson:

The Citizens for Environmental Justice, Suzie Canales, the Refinery Reform Campaign, and the Environmental Integrity Project submit this petition for objection to the above permit pursuant to the Clean Air Act and its implementing regulations, 42 U.S.C. § 7661d(b)(2), 40 C.F.R. § 70.8(d), and the Texas Admin. Code, Title 30 § 122.360. As required by these provisions, Petitioners are also providing a copy of this petition to the Executive Director of the Texas Commission on Environmental Quality ("TCEQ") and CITGO. Petitioners are providing a courtesy copy to Region 6 Regional Administrator Richard Greene.

The grounds for this petition are set out in the attached comments submitted by the Petitioners to TCEQ on December 16, 2005. Because TCEQ has yet to issue a final permit or respond to comments, Petitioners raise each deficiency identified in the comments as a ground for objection by EPA. The grounds include the following deficiencies:

- The use of incorporation by reference for emissions limitations and standards in CITGO's draft operating permit violates Title V and Part 70 and renders the permit practically unenforceable.
- The draft operating permit's monitoring requirements are not adequate to ensure compliance. Specifically, the draft permit should require more frequent monitoring to ensure compliance with opacity standards.
- The draft operating permit fails to require prompt reporting of deviations during normal operations.

- The draft operating permit does not clearly indicate which units must meet special conditions requiring compliance with Texas Administrative Code and Code of Federal Regulation provisions.

If you have any questions about this petition, please contact me at (202) 263-4449.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Karla Raettig', with a large, sweeping flourish extending to the right.

Karla Raettig
Counsel

cc (certified mail):

TCEQ Executive Director Glenn Shankle
U.S. EPA Regional Administrator Richard Greene
CITGO Petroleum Corporation

cc: (regular mail)

CITGO Refining and Chemical Company

cc (email only):

John Fogarty, EPA
Charles Sheehan, EPA
Adam Kushner, EPA
Steve Gilrein, EPA
Olivia Balandran, EPA