Document Control Sheet

Box ID	1119
Control Sheet ID	0000-0000-0000-9117
Item Barcode	100327736

AIRCO/VC0010G/RN101053296/CO

CITGO Petroleum Corp.
1708 N. Ben Jordan Boulevard
Victoria TX 77901

Certified Mail
Return Receipt Requested
7004 0550 0000 0342 0350

11 March 2011

United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733
Air Program Manager

RE: **CITGO Petroleum Corporation**
Victoria, Texas
Bulk Fuel Terminal
TCEQ Permit No. 18569

Air Program Manager:

CITGO Petroleum Corporation owns and operates a Petroleum Bulk Fuel Terminal located at 1708 North Ben Jordan Boulevard, in Victoria County Victoria, Texas. CITGO is providing this notification pursuant to 40 CFR 63.1066 (b)(1) and 30 days prior to refilling a storage tank to afford the Administrator an opportunity to have an observer present.

The CITGO Bulk Fuel Terminal intends to remove an aboveground storage tank (Tank 2) from service to allow for the 10 year inspection as required in 40 CFR 60.1063 (b)(1). Tank 2 was removed from service 10 January 2011. Inspections and repairs, if necessary, are anticipated to take approximately 30 days. Based on this schedule, Tank 2 will be returned to service on 15 April 2011. A complete seal replacement will be conducted while the tank is out of service.

Please do not hesitate to contact me at (361) 578-7909 or at [redacted] if you have any questions regarding this notification.

Sincerely,
CITGO Petroleum Corporation

Ronald Hoerig
Terminal Manager

cc: Air Program Manager ·TCEQ · Region 14 · Corpus Christi, Texas
The Region 14 address is
NRC Bldg., Ste. 1200
6300 Ocean Dr., Unit 5839
Corpus Christi TX 78412-5839

AIRCO/VCO010G/CN600135461/CO

1708 N. Ben Jordan Boulevard
Victoria, TX 77901

January 10, 2011

Administrator
U.S. EPA Region 6
1445 Ross Avenue
Suite 1200
Dallas, TX 75202-2733

RE: 40 CFR 63 Subpart BBBBBB (also known as 'GDGACT')
Notification of Compliance Status
CITGO Petroleum Corporation – Victoria, TX Terminal

To Whom It May Concern:

This communication should suffice as a revision to the GDGACT Notification of Compliance Status (hereafter 'NOCS') for the CITGO Petroleum Corporation Victoria, TX Terminal originally submitted on January 5, 2010. In the original submittal the column for Subpart WW compliance for internal floating roof tanks was inadvertently checked for the external floating roof tanks at the facility. CITGO's intent was and remains to indicate that the compliance option chosen was Subpart WW. The attached NOCS correctly indicates that the tanks have external floating roofs.

Please reference the following revised pages of this communication for facility specifics regarding compliance with the GDGACT regulation.

Should any additional technical information regarding this NOCS be needed, please contact William B. Lee III for additional guidance. Mr. Lee can be reached via telephone at (770) 455-6964 or via email at [redacted]

Respectfully,

Ronnie Hoerig
Terminal Manager

Attachments: GDGACT Notification of Compliance Status

CC: * Lane Tolar, Environmental, Health, Safety and Security Manager

* Chief Engineer
Texas Commission on Environmental Quality
MC 168
12100 Park 35 Circle
Austin, TX 78753

40 CFR 63 Subpart BBBBBB Notification of Compliance Status Worksheet

Facility: CITGO Petroleum Corporation Victoria, TX Terminal

Rule Promulgation Date: January 10, 2008

Rule Citation: 40 CFR Part 63 Subpart BBBBBB – Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.

I. Notifications/Submittals/Permitting:

Initial Notification for existing sources of applicability: Submitted on 5/2/2008.
[40 CFR 63.11093(a)]

Notification of Compliance Status: Submitted on 1/5/2011.
[40 CFR 63.11093(b)]

II. Gasoline Facility General HAP Summary:

The type and quantity of HAP's emitted by this source are less than 10 tpy of Individual HAP's, and less than 25 tpy for Total HAP's.
[40 CFR 63.9(h)(2)(D)]

The analysis demonstrating that the affected source is an 'Area Source' has been performed and documented in the application for the permit referenced below. Additional information can be provided upon request.
[40 CFR 63.9(h)(2)(E)]

Permit Number: TX R-18569

III. Gasoline Load Rack Compliance Method:

1. This facility is operating its gasoline loading rack pursuant to the following INITIAL compliance options:

Certification Statement. There currently exists an enforceable State, local or tribal rule or permit that requires the loading rack to meet an emission limit of 80 mg/L or less.
[40 CFR 63.11092(a)(2)]

Permit Number: TX R-18569

2. This facility is operating its gasoline loading rack pursuant to the following ONGOING compliance options:

Monitored Operating Parameter Determined by Engineering Assessment and the Manufacturer's Recommendation
[40 CFR 63.11092(b)(5)(ii)]

As required by this option, "the rationale for the selected operating parameter value, monitoring frequency, and averaging time, including data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the emission standard in §63.11088(a)" is included as an attachment.

Notes:

All excess emission events will be documented in the next semi-annual compliance report pursuant to 40 CFR 63.11095(b).

IV. Gasoline Tank Compliance Method(s):

				GDGACT Tank Compliance Options (40 *CFR* Part 63 Subpart BBBBBB)						
				11087(f) (NSPS Kb)	Table 1, Option 1	Table 1, Option 2.b	Table 1, Option 2.c	Table 1, Option 2.d (MACT WW)	Table 1, Option 2.d (MACT WW)	To be determined at the next tank degassing or prior to 2018.
Tank*	**Tank Type (IFR/EFR)****	**Product**	**Capacity (gals)**	NSPS Kb	Equip each gasoline storage tank with a fixed roof that is mounted to the storage tank in a stationary manner, and maintain all openings in a closed position at all times when not in use.	Equip each internal floating roof gasoline storage tank according to the requirements in 60.112b(a)(1) except for the secondary seal requirements under 60.112b(a)(1)(ii)(B) and the requirements in 60.112b(a)(1)(iv) through (ix).	Equip each external floating roof gasoline storage tank according to the requirements in 60.112b(a)(2) except for the requirements of 60.112b(a)(2)(ii) shall only be required if such storage tank does not currently meet the requirements of 60.112b(a)(2)(i).	Equip and operate each internal floating roof gasoline storage tank according to the applicable requirements in 63.1063(a)(1) and (b).	Equip and operate each external floating roof gasoline storage tank according to the applicable requirements in 63.1063(a)(1) and (b), and according to the applicable requirements in 63.1063(a)(2) if such storage tank does not currently meet the requirements of 63.1063(a)(1).	
1	EFR	Gasoline	1,344,000						X	
2	EFR	Gasoline	462,000						X	

* or category of tank

** IFR = Internal Floating Roof Tanks (including Domed External Floating Roof Tanks); EFR = External Floating Roof Tanks.

V. Gasoline Equipment Leak Inspection Compliance Method:

The facility will implement a monthly equipment leak inspection program that uses sight, sound, and smell observations of all gasoline equipment (including transmix equipment). Sight, sound, and smell sensory inspections are acceptable for fugitive leak point determinations pursuant to 40 CFR 63.11089(a).

Documentation (i.e. a 'log book') of these monthly equipment leak inspections will contain the following information:

- Record of the type of equipment;
- List, summary description or diagram showing the location of all equipment in gasoline service;
- Nature of the leak (e.g. liquid or vapor);
- Method of leak detection (e.g. sight, sound, or smell);
- Date of detection;
- Date of first attempt at repair (within 5-days of discovery);
- Date of successful repair (within 15-days of discovery);
- Reason for placing any equipment on the 'Delay of Repair' list (to be documented on the next semi-annual report);
- Inspector signature.
  [40 CFR 63.11089 and 40 CFR 63.11094(d) & (e)]

NOTE: Monthly equipment leak inspections must be conducted once per calendar month, no less than 28-days and no more than 35-days following the prior inspection. *[40 CFR 63.11100]*

VI. Certification Section:

The Responsible Official and certification statements specified herein are intended to meet both state and federal requirements.

I, being the Responsible Official, hereby affirm that, based on information and belief formed after reasonable inquiry, the statements made in this Notification of Compliance Status are true, accurate and complete to the best of my knowledge.

RONALD P. HOERIG
Print Name

TERMINAL MANAGER
Title

Ronald P. Hoerig
Signature

1-10-11
Date

COMPLIANCE METHODOLOGY FOR VAPOR COMBUSTION UNIT RATIONALE
[40 CFR 63.11092(b)(4)]

Summary Statement: CITGO is proposing to follow the inspection requirements of the alternate monitoring option for VCUs described in 40 CFR 63.11092(b)(1)(iii)(B)(2)(i)-(v). CITGO believes this demonstrates compliance with §63.11088(a) since EPA designed this option to do exactly that.

Specifically, the loading rack and VCU system is equipped with an automated control system with the following features:

- The loading rack control system has been designed to not permit loading until a signal has been received from the VCU indicating that a flame has been detected. Presence of a pilot flame is also periodically verified through visual observation.
  [40 CFR 63.11092(b)(1)(iii)(B)(2)(i)]

- The loading rack control system has been designed to not permit loading if the blower motor is not operating.
  [40 CFR 63.11092(b)(1)(iii)(B)(2)(ii)]

- The vapor line valve has been equipped with limit switches to indicate whether the valve is open or closed. The loading rack control system has been designed to go into shutdown alarm if the vapor line valve limit switches do not indicate the valve opens or closes as appropriate.
  [40 CFR 63.11092(b)(1)(iii)(B)(2)(ii)]

Any system malfunction and any activation of the automated alarm system will be documented with a written entry into a log book or other permanent form of record.
[40 CFR 63.11092(b)(1)(iii)(B)(2)(ii) and 40 CFR 63.11092(b)(1)(iii)(B)(2)(v)]

If for some reason the automated system is not functional then on any day in which the loading rack is operated a visual inspection of the pilot light, blower motor and vapor line valve will be performed.
[40 CFR 63.11092(b)(1)(iii)(B)(2)(ii)]

CITGO will conduct semi-annual preventative maintenance inspections on the VCU.
[40 CFR 63.11092(b)(1)(iii)(B)(2)(ii)]

Note that because the loading rack is equipped with an automatic shutdown mechanism that detects shutdown conditions prior to an excess emission actually occurring no such events should transpire. However, if for some unforeseen reason there should be a malfunction and loading continues, the facility will comply with incident investigation procedures as detailed at 40 CFR 63.11092(d)(4) and deviation or excess emission reporting as required by 40 CFR 63.11095, as appropriate.