



## CITGO Petroleum Corporation

Foot of 36th St. & Delaware River  
P.O. Box 655  
Pennsauken, NJ 08110

January 28, 2021

VIA EMAIL AND FEDEX

U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
901 Locust Street  
Kansas City, MO 64016  
Mr. Gregory Ochs  
Director, Central Region, OPS

Re: **CPF 3-2020-5029M**  
**Amended CITGO Response**

Dear Mr. Ochs:

On November 5, 2020, CITGO Petroleum Corporation received email notification of subject Notice of Amendment (NOA) and subsequently submitted a response to PHMSA on December 4, 2020. Based on additional conversations between CITGO and PHMSA personnel, CITGO is herein amending its initial response.

Should you have questions or need additional information please contact Mr. Scott Buckner at [SBuckne@citgo.com](mailto:SBuckne@citgo.com) or (847) 867-2420.

Best Regards

Jack McCrossin  
Manager EHSS  
Terminal Facilities and Pipelines

Cc: S. Buckner  
R. McCloskey  
L. Perez  
K. Sivinski  
S. Sullivan

PHMSA Notice of Amendment Letter dated 11/5/2020  
CITGO Petroleum Corporation Amended Response – 1-28-2021

1. PHMSA Allegation: Citgo's procedure for testing the overfill protection device at the grade level on Aboveground Storage Tanks is inadequate because it does not provide a process on what needs to be performed and documented under this specific testing method. During the inspection, PHMSA reviewed Citgo's overfill protection device testing procedure and informed Citgo that it did not incorporate the method used by the East Chicago Terminal for testing the overfill protection system at the grade level on tanks equipped with a cable attached to the alarm chain at the top of the tank. Although Citgo subsequently revised the procedure to include the testing of the alarms at the grade level, it remains inadequate because there is no step-by-step detail on what needed to be performed and documented under this specific testing method.

*CITGO RESPONSE: CITGO performed additional review of the High Level Alarm testing procedures and remains confident that these procedures are adequate as currently written. Subsequent to our conference call with PHMSA staff, this matter was re-evaluated and CITGO remains confident that site personnel are clear on the steps to be taken for alarm verification, whether conducted at ground level or on top of the tank.*

2. PHMSA Allegation: Citgo's Emergencies Plan is inadequate because it did not contain processes or procedures including taking necessary action, such as emergency shutdown or pressure reduction, to minimize the volume of hazardous liquid that is released from any section of a pipeline system in the event of a failure. Instead, the necessary response actions addressing the referenced code requirement are in Citgo's Facility Response Plan (FRP). This process needs to be adequately established and/or referenced back to the FRP within the written Emergencies Plan to satisfy the regulatory requirement of 195.402(e)(4).

*CITGO RESPONSE: CITGO has amended the Purpose/Scope Section 1.1 of its Facility Response Plan (FRP) to include additional language stating that the FRP is intended to meet the Emergency Procedure requirements set forth in 49 CFR 195.402 – a copy of the amended page of the FRP is herein included as Attachment 1. In addition, CITGO has amended Section G, page G-2 of its Operations and Maintenance Manual (O&M Manual) to clarify that the FRP is to be followed in the event of an Emergency. Revised Section G of the O&M Manual is herein included as Attachment 2.*

3. PHMSA Allegation: Citgo's Emergencies Plan and FRP did not specifically include procedures for the control of released highly volatile liquid (HVL) and minimizing the hazards, including possible intentional ignition of an HVL release. This aspect of the regularity requirement applies to the East Chicago Terminal since the terminal receives Butane (among other hazardous liquids) which is classified as an HVL. The procedures reviewed in Citgo's FRP include a step for controlling and minimizing hazardous liquid releases whereas the Emergencies Plan did not contain detailed guidance similar to the FRP and/or a reference to it. After the inspection, Citgo's FRP was revised to add a section specific to Butane Release Response which includes hazards minimization and intentional ignition of the vapor cloud under certain circumstances. However, this information needs to be adequately established in and/or referenced

back to the revised FRP in the written Emergencies Plan to satisfy the regulatory requirement of 195.402(e)(5).

*CITGO RESPONSE: CITGO has amended the Purpose/Scope Section 1.1 of its Facility Response Plan (FRP) to include additional language stating that the FRP is intended to meet the Emergency Procedure requirements set forth in 49 CFR 195.402 – a copy of the amended page of the FRP is herein included as Attachment 1. In addition, CITGO has amended Section G, page G-2 of its Operations and Maintenance Manual (O&M Manual) to clarify that the FRP is to be followed in the event of an Emergency. Revised Section G of the O&M Manual is herein included as Attachment 2.*

4. PHMSA Allegation: Citgo's Emergencies Plan is inadequate because it did not contain detailed procedures for minimizing public exposure to injury and probability of accidental ignition. The necessary response steps were found in the FRP. However, this information needs to be adequately established and/or referenced back to the FRP in the written Emergencies Plan to satisfy the regulatory requirement prescribed by 195.402(e)(6).

*CITGO RESPONSE: CITGO has amended the Purpose/Scope Section 1.1 of its Facility Response Plan (FRP) to include additional language stating that the FRP is intended to meet the Emergency Procedure requirements set forth in 49 CFR 195.402 – a copy of the amended page of the FRP is herein included as Attachment 1. In addition, CITGO has amended Section G, page G-2 of its Operations and Maintenance Manual (O&M Manual) to clarify that the FRP is to be followed in the event of an Emergency. Revised Section G of the O&M Manual is herein included as Attachment 2.*

5. PHMSA Allegation: Citgo's FRP and Emergencies Plan did not specifically include a procedure for the use of appropriate instruments to assess the extent and coverage of the vapor cloud and determine the hazardous areas resulting from highly volatile liquid releases. This aspect of the regularity requirement applies to the East Chicago Terminal since the terminal receives Butane (among other hazardous liquids) which is classified as an HVL. After the inspection, Citgo's FRP was revised by adding a section specific to Butane Release Response. However, this information needs to be adequately established in the written Emergencies Plan and/or referenced back to the revised FRP to satisfy the regulatory requirement of 195.402(e)(8)

*CITGO RESPONSE: CITGO has amended the Purpose/Scope Section 1.1 of its Facility Response Plan (FRP) to include additional language stating that the FRP is intended to meet the Emergency Procedure requirements set forth in 49 CFR 195.402 – a copy of the amended page of the FRP is herein included as Attachment 1. In addition, CITGO has amended Section G, page G-2 of its Operations and Maintenance Manual (O&M Manual) to clarify that the FRP is to be followed in the event of an Emergency. Revised Section G of the O&M Manual is herein included as Attachment 2.*