

**From:** [Buckner, Scott B](#)  
**To:** [BURTON, PATRICK](#)  
**Cc:** [Johns, William T](#); [Webster, Chad M](#)  
**Subject:** CITGO Huntington Terminal Stack Test  
**Date:** Wednesday, May 06, 2020 12:57:40 PM

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Good afternoon Mr. Burton – hope you are staying well in these trying times.

CITGO has retained the services of stack test contractor Erthwrks to perform stack testing at our Huntington Terminal located at 4393 Meridian Road (Air Permit 069-40316-00004). Based on Permit Condition D.1.5 we are required to conduct this test at least once every 5 years from the date of the most recent valid compliance demonstration. The last valid compliance demonstration was completed on July 14, 2015. That said - we are required to complete the next test no later than July 14, 2020.

Due to the decrease in demand for refined petroleum products as a result of COVID 19, our Huntington Terminal throughputs have decreased dramatically and are now down 30-50% of our normal rack volumes. Based on the current volumes we may not be able to meet the required 80,000 gallons of gasoline throughput during the test.

As a result these circumstances, I am writing to request permission to conduct the stack test at Huntington outside of the 5 year window. We are hopeful that our volumes will return to normal late summer or early fall and would expect to be able to complete a valid test at that time.

Please let me know if I should forward this request to someone other than yourself and if any additional information is necessary.



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