Coastal Watch Association
Cheniere Federal Operating Permit #O4592
Community Talking Points
April 10, 2025

1. This Cheniere facility near Gregory, Texas is actively releasing many compounds that are dangerous to our local environment and our residents including: volatile organic compounds (VOCs) – 246.70 tons per year (TPY), particulate matter (PM) – 17.22 TPY, PM with a diameter of 10 microns or less (PM_{10}) – 17.22 TPY, PM with a diameter of 2.5 microns or less ($PM_{2.5}$) – 17.22 TPY, nitrogen oxides (NOx) – 281.65 TPY, carbon monoxide (CO) – 1610.19 TPY, sulfur dioxide (SO_2) – 15.30 TPY, hydrogen sulfide (H_2S) – 0.22 TPY, carbon dioxide (CO_2) – 1,368,198 TPY, methane (CH_4) – 1,887 TPY, nitrous oxide (N_2O) – 3.2 TPY, CO_2 equivalent – 1,416,292 TPY, and helium (He) – 976 TPY. The general public is worried about current and future plant operations because there is potential to negatively impact individuals with pre-existing health conditions, our precious children, and the elderly.
2. Per the information provided on the Statement of Basis of the Federal Operating Permit, this Cheniere facility is considered a major source of pollutants for VOCs, PM, NOx, hazardous air pollutants (HAPs), and CO. This facility does not need to expand, as it needs to minimize its pollution contributions in our local communities.
3. Many in our local communities are already concerned about operations at the Cheniere facility as its flares have been lighting up the sky for days and weeks at a time during the last several months. It seems obvious that the plant has been experiencing upset conditions, though its emergency ground flares are not often actively operational as they should be. Cheniere does not need to expand its operations and infrastructure because it seems obvious that the site cannot properly control the infrastructure it currently manages.
4. After review, the Coastal Watch Association and many members of the surrounding community feel that Cheniere's proposed draft federal operating permit should be reconsidered and revised as it seems to be incomplete, contains inaccuracies, and some of its current permitting conditions seem inappropriate.
5. This proposed Title V Permit will give Cheniere regulatory approval to increase its processing of its natural gas that it receives from the pipeline system for export as liquid natural gas (LNG) that will not be consumed in the United States.
6. Because Cheniere will be exporting all its LNG produced by its seven new production trains, its proposed permit documents state that "emissions related to vessel loading will be controlled by an existing marine flare that is already authorized" by New Source Review and standard permit authorizations. The existing flare already pollutes our community's airshed, and now more emissions will be shoved through it. The proposed federal

operating permit is not accurate in its combustion efficiency expectations, as it overstates the ability to always operate optimally which is something the manufacturer advertises on operational manuals. TCEQ and Cheniere should already know this and take it into consideration during permitting actions and facility operations, respectively.

7. The approval of this proposed Title V permit will increase water vessel traffic, and as a result, our surrounding environment will become less aesthetically appealing. As the vessels are moored at the Cheniere docks, each of their engines will idle for many hours resulting in increased pollution that will negatively affect our air quality, thus the proposed permit seems incomplete on this front as it does not address this commonplace scenario.
8. This proposed permit will approve the construction of three new ground flares to control process emissions from the Stage 3 liquification trains. The ground flares are supposed to control emissions from continuous system purge, refrigerant compressor seal leakage, periodic maintenance, start up and shutdown emissions, and emissions during emergency periods. The ground flares will increase pollution in our community's airshed and will light up the surrounding area so that it will be visible from miles away (remarkably similar to the Gulf Coast Growth Ventures – An ExxonMobil and SABIC joint venture facility). I do not believe the flare combustion efficiency declarations are an accurate representation of the emission sources.
9. This proposed permitting action will approve the use of nine fixed-roof storage tanks to store diesel fuel required for the seven standby generators and firewater pumps. These storage tanks will not be equipped with vapor recovery systems so emissions will be released out of all the tank vents when ambient temperatures are warm causing volatilization of compounds, thus the appropriateness of the proposed permit conditions are certainly in question without clarification from both Cheniere and TCEQ.
10. Cheniere is already a big polluter in the Ingleside and Gregory-Portland areas as documented by two optical gas imaging (OGI) camera projects in December 2021 September 2022, respectively. The documented pollution from its existing LNG process trains filled the horizon with pollution way beyond the company's property lines. Though this pollution was not visible to the bare eye, it was visible to the scientific OGI instrument that EPA deems the best system for emission reduction (BSER) in the oil and gas world. The proposed industrial expansion will only increase air and water emissions within our communities; thus, the permit's accuracy is in question now because it is not properly regulating emissions to minimize pollution. I am afraid for our communities, as the proposed permit does not appear appropriate nor realistic when considering past field documentation.
11. This permitting action allows for a compliance determination from trained personnel using 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A (Method 9) for determining opacity (dust visibility) of emissions from stacks or flares. However, though the federal government allows it, this permitting action does not allow for the use of EPA

Alternative Method 082 that can be used “in lieu” of Method 9, as there is required proficiency training. This cell phone alternative method matches the American Society of Testing and Materials (ASTM) Method D7520. Why is this permitting action not allowing an equivalent method to be used when the TCEQ Executive Director has the authority to do so?

12. Per the proposed Cheniere Title V permit’s Special Terms and Conditions: Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting 3A (4) narrative states that “A certified opacity reader is not required for visible emissions observations.” Why is this TCEQ-issued permit so lenient that it does not require a certified operator that has completed training? TCEQ can establish enhanced technical standards for this permitting action, as they are inappropriate for pollution minimization.
13. Cheniere’s proposed Title V permit states that the “Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area.” Per these permits authorizing the Construction and Operation of the Corpus Christi Liquefaction, LLC LNG Terminal, it states that “All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission.” There is nothing stated in the permit regarding the use of certified-National Environmental Laboratory Accreditation Program (NELAP) laboratories and procedures that are typically mandated by the State of Texas with regards to enforceable data and documentation. This concept needs to be added to the proposed permit to demonstrate compliance with Texas law.
14. It appears that these TCEQ permitting actions lack specificity, and thus they are largely unenforceable without it. TCEQ used boilerplate permitting language instead of using more enforceable language for a community that is venerable because of incredibly significant industrial expansion in the area, thus the accuracy of the declarations are in question. The proposed permit declares that the closed vent capture systems for the multi-point ground flares shall be inspected, and the records of the inspections must be maintained and if any of the inspections are not satisfactory, then the permit holder shall promptly take corrective action. Again, the permit lacks specificity as it does not clearly define the phrases “are not satisfactory” or “promptly take corrective action.” The proposed permit lacks completeness in this area.
15. TCEQ and EPA do not own or operate continuous air monitoring stations in the Ingleside and Gregory-Portland areas. Consequently, current ambient air conditions are not being characterized as safe by our environmental regulators at this time, nor is there an ability to measure pollution concentrations real-time during times of plant upset. The citizens of the Upper Bend are not being properly protected even though our taxes are supposed to fund such infrastructure. The local Gregory-Portland ambient air monitoring network funded by industry does not include continuous volatile organic compound monitoring (only canister

sampling), methane monitoring to gauge Cheniere compliance, and does not include real-time access to the data for decision-making, as it typically takes one month to validate it.

16. The proposed permit declares that the high-pressure burners within each of the multi-point ground flares are used to achieve 99% VOC, methane, and hydrogen sulfide destruction and removal efficiencies. It also states that the ground flares will have a destruction efficiency of 99.9% for methane, while the flare systems must achieve 99% destruction efficiency. TCEQ has no equipment to measure the actual combustion efficiency to ensure compliance with the permitting language, nor does it require the company to measure it real-time for enforceability. This proposed permit lacks a means to practically measure combustion efficiency accurately, and instead, it uses manufacturer specifications that are unenforceable. This is an inappropriate use of permit conditions.
17. The proposed permit states that "the special conditions of this permit, the following applies to all piping, valves, connectors, pumps, and compressors" including "to the extent that good engineering practices will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation." The permit does not clearly define "good engineering practices" or "reasonably accessible," thus it uses inappropriate permit conditions that are unenforceable when more specific language could be used to increase enforceability.
18. Cheniere's Title V Federal Operating Permit includes by reference the site's New Source Review Permits that were approved by TCEQ on March 29, 2023, authorizing the following: seven LNG liquefaction trains that include a gas-fired furnace, a thermal oxidizer, a standby generator with a diesel storage tank, and an amine storage tank, along with support facilities including one standby diesel generator, two fire water pumps and diesel storage tanks, three multi-point ground flares, and eight fugitive emission sources. The permit generally lacks specificity in the proposed permitting details, and thus, it appears incomplete in several areas with regards to potential compliance processes and recordkeeping requirements to ensure compliance.
19. With approval of Cheniere's Title V Federal Operating Permit, its associated New Source Review Permit allows wide discretion to the TCEQ Corpus Christi office to make the company demonstrate permitting compliance by various actions. These actions would be more enforceable if the discretion is removed and details are added. Without more specificity, this permit lacks completeness in this TCEQ permitting action.
20. This proposed Title V permit authorizes additional LNG to be exported from its Ingleside terminal. Consequently, with increased marine vessel (including both ships and barges) traffic, we can expect more seagrass destruction, silting, and general harm to aquatic species. How does TCEQ specifically regulate such destruction through the permitting and enforcement process?