

Other Staff Member(s):

Role	Name
QA Reviewer	TRISTAN RIEGER
Supervisor	KELLY RUBLE
Supervisor	GUADALUPE LOPEZ
Investigator	TRISTAN RIEGER

Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
AIR COMPLAINT INVESTIGATION	375870
AIR COMPLAINT INVESTIGATION	375916
AIR COMPLAINT INVESTIGATION	375913
AIR COMPLAINT INVESTIGATION	375910
AIR COMPLAINT INVESTIGATION	375905
AIR FOCUSED INVESTIGATION - GENERAL MONITORING	1802723
AIR EQUIPMENT	1802723

Investigation Comments:

I. INTRODUCTION

On March 1, 2022, five complaints alleging unauthorized emissions (documented on December 13, 14, 16, and 17, 2021) from the Corpus Christi Liquefaction LLC (Cheniery) site, the alleged regulated entity (RE), were received by the Texas Commission on Environmental Quality (TCEQ) Region 14 (R14) Office (Incident Nos. 375870, 375905, 375910, 375913, and 375916). The RE is located at 622 State Highway 35, Gregory (San Patricio County), Texas. On March 10, 2022, the complaints were assigned to Ms. Cindy Smith, TCEQ R14 Environmental Investigator (EI). Assisting in this investigation was Mr. Tristan Rieger, TCEQ R14 EI. The RE contacts were Ms. Jessica Muennink - Environmental, Health, and Safety Manager, Mr. Craig Kondoff - Environmental Supervisor and Mr. Ari Aziz - Vice President and General Manager.

Daily Narrative

On March 11, 2022, Ms. Smith contacted Ms. Muennink and emailed her the complainant's video links and a TCEQ Air Site Visit Questionnaire to gather additional information on what was observed in the videos. A response to the questionnaire was due by March 18, 2022. Mr. Kondoff requested an extension until March 24, 2022. This request was granted.

On March 24, 2022, at 0918 hours, the EIs investigated the potential emissions in response to the complaint. Meteorological conditions at the time of the investigation, per the Kestrel 5500 Weather Meter, consisted of westerly winds at 6 - 10 miles per hour, with an ambient temperature at 66 degrees Fahrenheit. The EIs conducted handheld air monitoring at the RE's southwest perimeter utilizing a MultiRae Lite analyzer for monitoring volatile organic compounds (VOC), carbon monoxide (CO), and hydrogen sulfide (H2S) in parts per million (ppm) in ambient air. No readings above background levels were detected for VOC, CO, or H2S, and the background readings for all contaminants were 0.00 ppm. NOTE: Prior to departing the TCEQ R14 Office, the MultiRae Lite analyzer was bump tested and passed all the applicable standards. Ms. Smith utilized the optical gas imaging camera (OGIC) to detect hydrocarbon emissions and observed multiple emission points identified in the complaint. At the time of the investigation, normal operations of combustion sources were observed, along with temperature differences between ambient temperature and heated process equipment.

At 1719 hours, Mr. Kondoff submitted the questionnaire response (included in Attachment 1). Per Mr. Kondoff, no reportable or non-reportable emissions event or start-up, shutdown, maintenance activity occurred at the RE during the time of the recorded OGIC videos on December 13, 14, 16 and 17, 2021. The flares, three thermal oxidizers (EPNs TO-1, TO-2, and TO-3), and eighteen turbines (EPNs TRB1 - TRB18) are authorized under Permit No. 105710/PSDTX1306M1. Mr. Kondoff indicated that at the time of the videos, the flares operated under normal conditions. In addition, Mr. Kondoff indicated that EPN TO-3's short-term emission limits were exceeded for nitrogen oxides and for particulate matter at certain times during the videos and that the RE previously

reported these deviations in the associated Title V deviation report. Corrective actions were conducted on February 28, 2022, when short-term (lb/hr) alarms were implemented on all thermal oxidizers. This noncompliance issue was cited as Violation Track No. (VTN) 810433 in a separate investigation (refer to Investigation No. 1805519).

Upon review of submitted documentation in regards to the complaint allegation, it was determined that the RE was in compliance with air regulations.

Exit Interview

No violation was issued during this investigation.

II. GENERAL FACILITY AND PROCESS INFORMATION

Process Description

Corpus Christi Liquefaction is an export and import liquefied natural gas (LNG) facility with regasification capabilities. LNG is imported or exported via LNG carriers that arrive at the marine terminal. The marine terminal also has the capability to liquefy natural gas from the associated pipeline system for export as LNG or import LNG and regasify it to send out into the pipeline system. The primary Standard Industrial Classification (SIC) code for the RE is 4925. Descriptions of the process units, flow diagrams, and plot plans of individual production units may be located in the TCEQ Records Online application (<https://records.tceq.texas.gov>).

III. BACKGROUND

Customer Number (CN): CN604136374

Classification: Satisfactory

Rating: 2.24

Regulated Entity Number (RN): RN104104716

Classification: Satisfactory

Rating: 2.24

NOTE: Title 30 TAC §60.2 - Compliance History Classification (Point Ranges):

High Performer (above-satisfactory compliance record) = fewer than 0.10 points;

Satisfactory Performer (generally complies with environmental regulations) = 0.10 to 55 points; Unsatisfactory Performer (performs below minimal acceptable performance standards established by the commission) = more than 55 points

Agreed Orders, Court Orders, and Other Compliance Agreements

Refer to Attachment 2 for the Compliance History Report.

Prior Compliance/Enforcement Issues

Refer to Attachment 2 for the Compliance History Report.

Complaints

During the previous two years, the RE has not been the subject of any prior complaint allegation.

IV. ADDITIONAL INFORMATION

Conclusions, Recommendations/Current Enforcement Issues

During this investigation, one noncompliance issue (VTN 810433) was discovered; however, VTN 810433 was addressed and resolved in a separate investigation (Investigation No. 1805519). Therefore, a general compliance letter was issued to the RE.

Additional Issues

The videos documented by the citizen's OGIC on December 13, 14, 16, and 17, 2021 and posted publicly do not meet the protocol requirements for TCEQ Citizen Collected Evidence (CCE). The citizen's affidavit and CCE were included with the official complaint to the TCEQ (included in Attachment 3).

V. ATTACHMENTS

- 1. Documentation
- 2. Compliance History Report
- 3. Citizen Affidavit and CCE

No Violations Associated to this Investigation

Signed 

Environmental Investigator

Date 07/08/2022

Signed 

Supervisor

Date 07/08/2022

Attachments: (in order of final report submittal)

- Enforcement Action Request (EAR)
- Letter to Facility (specify type) : General Compliance
- Investigation Report
- Sample Analysis Results
- Manifests
- Notice of Registration

- Maps, Plans, Sketches
- Photographs
- Correspondence from the facility
- Other (specify) :
- See the attachment list on page 4 of 4.

ATTACHMENT 1

Documentation

Corpus Christi Liquefaction, Regulated Entity Number RN104104716
Corpus Christi Liquefaction LLC, Customer Number CN604136374
San Patricio County

Investigation Start Date: 03/24/2022

Investigation No. 1802723

Total Pages = 4



**Texas Commission on Environmental Quality (TCEQ)
Air Site Visit Questionnaire**

TCEQ Representative:	Cindy Smith	Contact Phone:	
Date and Time of Observation(s)	Various; 12/13/2022 – 12/17/2022	Contact Email Address:	
Site Location/Address:	644 HWY 35, Gregory, TX 78359	Account/RN:	RN104104716
Company and Site Name:	Corpus Christi Liquefaction (CCL)	TCEQ Site Authorization by Unit	Air Permit No. 105710/ PSDTX1306M1/ GHGPSDTX123M1
Facility Contact:	Craig Kondoff	Railroad Commission ID:	NA

Background: While conducting observations in the area, TCEQ staff members noted odors, visible emissions, infrared images of volatile organic compound emissions, and/or other monitoring data indicating emissions coming from your site. This form is being provided to gather information on the potential sources of these emissions. **Please respond to the following questions within [redacted] hours/days of receiving this list.** Please email your response back to [TCEQ representative](#) at [Click here and type email address](#).

Technical Questions

- Please explain the cause of the emissions observed by TCEQ. For example was it a reportable or non-reportable emissions event/Start-up, Shutdown, and Maintenance (SSM) activity? Please explain in detail or provide a complete record of the non-reportable or reportable event including the State of Texas Environmental Electronic Reporting System (STEERS) incident number? **CCL: CCL reviewed the videos provided by TCEQ. For the purposes of this review, CCL assumes the timestamps provided on the videos are accurate. Based on this information and our review of the videos, the emissions in the video are associated with routine operations. There were no reportable/non-reportable emissions events or SSM activities associated with the video observations.**
- What equipment clearing and/or cleaning activities and/or other additional maintenance activities with the potential to emit are occurring or have occurred in the time leading up to and including the time of the TCEQ's observations? **CCL: No applicable events occurred in the time leading up and including the time of the observations.**
- What loading/unloading activities with the potential to emit are occurring or have occurred in the time leading up to and including the time of the TCEQ's observations? **CCL: CCL was not able to identify instances of emissions associated with loading/unloading activities in the videos provided by TCEQ. After a review of the records against the dates indicated in the timestamped videos, marine loading of an LNG ship did occur from December 13, 2021 18:00 to December 14, 2021 04:00; however, as stated previously, that activity is not visible in the videos provided. For reference, the video timestamps were as follows:**
 - Incident No. 375870: 12/13/21 22:55; 23:16; 23:30
 - Incident No. 375905: 12/13/21 23:47
 - Incident No. 375910: 12/14/21 11:35; 11:43 (only video with marine flare)
 - Incident No. 375913: 12/16/21 22:59; 23:05

- Incident No. 375916: 12/17/21 00:02

- Please indicate how the observed and/or measured emissions are authorized. Include the type of authorization and any specific authorization details, where available (e.g. permit numbers, permit limits, application/permit representations, EPNs, PBR authorizations). **CCL: Emissions from all turbines (EPN: TRB1-18), thermal oxidizers (EPN TO-1 – 3), and flares (EPN: WTDFLR1-2, MRNFLR) are authorized under Permit No. 105710 / PSDTX1306M1 / GHGPSDTX123M1.**
- Does this site handle sour crude and/or sour gas as defined in 30 TAC §101.1, prior to the introduction of hydrogen sulfide (H₂S) scavenger or similar agents that sweeten the process? If sour crude and/or sour gas is handled, what are the expected and measured concentrations of H₂S or total reduced sulfur that are present? **CCL: The site does not handle sour crude and/or sour gas.**
- If flares are associated with the TCEQ’s observations, please explain the type and purpose of the flare. Include equipment routed to the flare if relevant to the documented emissions and include the type of authorization and any specific authorization details, where available (e.g. permit numbers, permit limits, application/permit representations, EPNs, PBR authorizations). **CCL: EPNs: WTDYFLR1-2 and MRNFLR are authorized under Permit No. 105710 / PSDTX1306M1 / GHGPSDTX123M1 and are permitted for the following hourly emission rates:**

WTDYFLR1-2:

	NOx	CO	VOC	SO2	H2S
Routine (lb/hr):	71.29	283.93	61.26	4.42	0.05
MSS (lb/hr):	816.68	3252.52	2895.54	2.20	0.02

MRNFLR:

	NOx	CO	VOC	SO2	H2S
Limit (lb/hr):	106.23	909.72	7.85	0.01	0.01

Routine emissions from EPNs: WTDYFLR1-2 (elevated air-assisted process flares) generally originate from the control of non-recoverable waste gasses from the front-end gas treatment, back-end liquefaction processes, and purge gasses required to maintain safe operations.

Routine emissions from EPN: MRNFLR (enclosed ground flare) originate from the control of boil off gas associated with ship loading and conditioning that cannot be returned to the process due to quality and temperature specification.

- If flares are present, was there any flaring associated with the activities detailed in items 1 – 4 above? **CCL: All observed emissions from the flares were due to routine operations.**
- If cooling towers are associated with the TCEQ’s observations, are the hourly average emissions from the relevant cooling tower(s) more than 20 lbs/hr higher than the same cooling tower’s hourly average emissions for the previous day? **CCL: N/A, no cooling towers on site.**
- What were the hourly emissions for the event or activity associated with TCEQ’s observations (including emission calculations), both by total and by compound, from the observed unit(s)? **CCL: See attached spreadsheet.**
- If an optical gas imaging camera (OGIC) video was provided with this questionnaire, please provide a detailed process description, identification and explanation for the unit or equipment with the observed emissions, and cause for the observed emission. **CCL: TRB1-18 are natural gas fired turbines used to drive compressors for refrigeration of natural gas to facilitate the natural gas liquefaction process. TO-1 – TO-3 are thermal oxidizers that control the waste gas produced from the sulfur removal system. The WTDYFLR1-2 are elevated process flares that control emissions consisting of non-recoverable waste**

gasses from the front-end gas treatment, back-end liquefaction processes, and purge gasses required to maintain safe operations. The MRNFLR is an enclosed ground flare that controls boil off gas emissions associated with ship loading and conditioning that cannot be returned to the process due to quality and temperature specification.

11. If emissions are non-routine or are unauthorized, what corrective actions are being taken to abate any identified unauthorized emissions? CCL: TO-3 exceeded the short-term (lb/hr) limit of NOx and PM during the period timestamped in the videos. Hourly NOx emissions exceeded the permit limit by 0.2 lb/hr, 0.21 lb/hr, and 0.23 lb/hr. Hourly PM emissions exceeded the permit limit by 0.03 lb/hr, 0.03 lb/hr, and 0.04 lb/hr. These deviations were previously reported in the semi-annual Title V deviation report submitted January 27, 2022. Short-term (lb/hr) alarms on all thermal oxidizers (TO-1 – TO-3) were implemented on February 28, 2022 as a corrective action.

Limit	4.69	0.58
	lb/hr	lb/hr
Time/Date (Hourly)	NOx	PM
13-Dec-21 23:00:00	3.24	0.41
16-Dec-21 22:00:00	4.89	0.61
16-Dec-21 23:00:00	4.90	0.61
17-Dec-21 00:00:00	4.92	0.62

12. What is the distance to the nearest off-site receptor (e.g. residence, park, school, church, or other structure)? CCL: Stephen F. Austin Elementary School is nearest to the CCL fence line (approximately 3200 feet) and approximately 2.4 miles from the nearest source in the video.
13. Please provide operational data associated with the equipment/process identified in the OGIC video (examples shown in box below). CCL: See attached data.

Examples of relevant process data for storage tanks would include but are not limited to: tank fill rates/temperatures/product vapor pressure, content of tank, specific gravity of tank contents, design of tank/roof, all information on pressure testing of roof and associated compliance data, date/name of installer, status of tank including static/loading rates/product loaded, estimated emission losses including calculations, previous sampling data, permit allowable emission rates, and unit production rates.

Examples of relevant process data for flares would include but are not limited to: manufacturer specifications and operation manuals, flare thermocouple readings, operational parameters, make-up gas composition, relevant waste streams, and temperature/flow rate records.

Examples of relevant information for other source types would include but are not limited to: operational parameters, estimated emission losses including calculations, previous sampling data, permit allowable emission rates, and unit production rates. **Please provide all documentation to show compliance with applicable requirements on all named emission sources.**

Train 3 Thermal Oxidizer

Time/Date (Hourly)	DEGF	MOL %	SCFH	Btu/scf	SCFH	MMBtu/hr	PPM	Permit Limit					
								4.69	13.84	0.24	1.44	0.008	0.58
								lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr
Incinerator T	O2	Fuel Gas Flow	Fuel Gas HHV	Waste Gas Flow	Total Heating Value	Waste Gas H2S	NOx	CO	VOC (Total)	Sulfur Dioxide	Hydrogen Sulfide	PM	
13-Dec-21 23:00:00	1746.115149	9.680129787	55111.61	999.97	148160.53	54.05	4.22	3.24	4.45	0.05	0.11	0.00	0.41
16-Dec-21 22:00:00	1750.272075	8.181367733	83575.53	994.25	170992.81	81.57	3.54	4.89	6.72	0.06	0.11	0.00	0.61
16-Dec-21 23:00:00	1750.028644	8.196709187	83679.64	995.46	174346.00	81.70	3.56	4.90	6.73	0.06	0.11	0.00	0.61
17-Dec-21 00:00:00	1749.61695	8.180744656	83999.87	994.24	180618.54	82.05	3.56	4.92	6.76	0.06	0.11	0.00	0.62

Emission Factors		References
NOx	0.06 lb/MMBtu	TCEQ BACT Guidance
CO	0.082 lb/MMBtu	AP-42 Table 1.4-1
PM	0.0075 lb/MMBtu	AP-42 Table 1.4-2

ATTACHMENT 2

Compliance History Report

Corpus Christi Liquefaction, Regulated Entity Number RN104104716
Corpus Christi Liquefaction LLC, Customer Number CN604136374
San Patricio County

Investigation Start Date: 03/24/2022
Investigation No. 1802723
Total Pages = 6





Compliance History Report

Compliance History Report for CN604136374, RN104104716, Rating Year 2021 which includes Compliance History (CH) components from September 1, 2016, through August 31, 2021.

Customer, Respondent, or Owner/Operator:	CN604136374, Corpus Christi Liquefaction, LLC	Classification: SATISFACTORY	Rating: 2.24
Regulated Entity:	RN104104716, CORPUS CHRISTI LIQUEFACTION	Classification: SATISFACTORY	Rating: 2.24
Complexity Points:	13	Repeat Violator: NO	
CH Group:	14 - Other		
Location:	622 HWY 35 GREGORY, TX 78359, SAN PATRICIO COUNTY		
TCEQ Region:	REGION 14 - CORPUS CHRISTI		

ID Number(s):

AIR OPERATING PERMITS PERMIT 3580	AIR OPERATING PERMITS ACCOUNT NUMBER SDA005E
PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 2050079	AIR NEW SOURCE PERMITS PERMIT 105710
AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX123	AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX157
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1496	AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1306
AIR NEW SOURCE PERMITS PERMIT 139479	AIR NEW SOURCE PERMITS REGISTRATION 167968
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1306M1	AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX123M1
AIR NEW SOURCE PERMITS AFS NUM 4840900071	WASTEWATER PERMIT WQ0005367000
WASTEWATER EPA ID TX0134002	AIR EMISSIONS INVENTORY ACCOUNT NUMBER SDA005E
TAX RELIEF ID NUMBER 24569	TAX RELIEF ID NUMBER 23975
TAX RELIEF ID NUMBER 24545	TAX RELIEF ID NUMBER 23760
TAX RELIEF ID NUMBER 24621	TAX RELIEF ID NUMBER 23498
TAX RELIEF ID NUMBER 24620	TAX RELIEF ID NUMBER 24622
TAX RELIEF ID NUMBER 24547	TAX RELIEF ID NUMBER 23495
TAX RELIEF ID NUMBER 23912	TAX RELIEF ID NUMBER 23911
TAX RELIEF ID NUMBER 23494	TAX RELIEF ID NUMBER 23761
TAX RELIEF ID NUMBER 23762	TAX RELIEF ID NUMBER 23763
TAX RELIEF ID NUMBER 22908	TAX RELIEF ID NUMBER 23057
TAX RELIEF ID NUMBER 22931	TAX RELIEF ID NUMBER 22923
TAX RELIEF ID NUMBER 22919	TAX RELIEF ID NUMBER 22989
TAX RELIEF ID NUMBER 22590	TAX RELIEF ID NUMBER 22916
TAX RELIEF ID NUMBER 22988	TAX RELIEF ID NUMBER 22907
TAX RELIEF ID NUMBER 22929	TAX RELIEF ID NUMBER 22930
TAX RELIEF ID NUMBER 22913	TAX RELIEF ID NUMBER 22909
TAX RELIEF ID NUMBER 23056	TAX RELIEF ID NUMBER 22920
TAX RELIEF ID NUMBER 22589	TAX RELIEF ID NUMBER 22924
TAX RELIEF ID NUMBER 22910	TAX RELIEF ID NUMBER 23297
TAX RELIEF ID NUMBER 22917	TAX RELIEF ID NUMBER 22918
TAX RELIEF ID NUMBER 22925	TAX RELIEF ID NUMBER 22927
TAX RELIEF ID NUMBER 22912	TAX RELIEF ID NUMBER 22922
TAX RELIEF ID NUMBER 22906	TAX RELIEF ID NUMBER 22926
TAX RELIEF ID NUMBER 22928	TAX RELIEF ID NUMBER 22921
TAX RELIEF ID NUMBER 23058	TAX RELIEF ID NUMBER 22610
TAX RELIEF ID NUMBER 22915	TAX RELIEF ID NUMBER 22914
TAX RELIEF ID NUMBER 24021	TAX RELIEF ID NUMBER 24546
TAX RELIEF ID NUMBER 24570	TAX RELIEF ID NUMBER 24568

Compliance History Period: <u>September 01, 2016 to August 31, 2021</u>	Rating Year: <u>2021</u>	Rating Date: <u>09/01/2021</u>
Date Compliance History Report Prepared: <u>May 10, 2022</u>		
Agency Decision Requiring Compliance History: <u>Enforcement</u>		

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: TCEQ Staff Member

Phone: (512) 239-1000

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? YES
2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

See addendum for information regarding federal actions.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

Item 1	January 04, 2017	(1779583)
Item 2	April 17, 2017	(1779538)
Item 3	July 24, 2017	(1779553)
Item 4	October 10, 2017	(1779568)
Item 5	November 30, 2017	(1449601)
Item 6	January 23, 2018	(1779584)
Item 7	April 11, 2018	(1779539)
Item 8	June 13, 2018	(1467137)
Item 9	July 26, 2018	(1779559)
Item 11	October 24, 2018	(1779569)
Item 13	January 24, 2019	(1779585)
Item 14	February 19, 2019	(1538368)
Item 15	April 23, 2019	(1779540)
Item 16	July 23, 2019	(1779555)
Item 17	August 14, 2019	(1578932)
Item 18	August 27, 2019	(1578942)
Item 20	October 23, 2019	(1779570)
Item 21	November 25, 2019	(1610691)
Item 22	November 26, 2019	(1605788)
Item 23	January 22, 2020	(1779586)
Item 24	January 28, 2020	(1603853)
Item 25	February 11, 2020	(1617950)
Item 26	March 06, 2020	(1632574)
Item 27	April 20, 2020	(1779541)
Item 28	May 14, 2020	(1645407)
Item 29	May 21, 2020	(1646900)
Item 30	June 24, 2020	(1652577)
Item 31	July 23, 2020	(1779556)
Item 32	August 13, 2020	(1622660)
Item 33	October 06, 2020	(1679110)
Item 34	October 09, 2020	(1622659)
Item 35	October 23, 2020	(1678317)
Item 36	October 26, 2020	(1779576)
Item 37	October 29, 2020	(1685520)
Item 38	November 13, 2020	(1659743)
Item 39	November 17, 2020	(1690485)
Item 40	December 17, 2020	(1697140)
Item 41	December 23, 2020	(1697125)

Item 42	January 19, 2021	(1779592)
Item 43	January 25, 2021	(1692337)
Item 44	April 15, 2021	(1706110)
Item 46	April 22, 2021	(1779546)
Item 47	May 13, 2021	(1706400)
Item 48	June 28, 2021	(1711699)
Item 49	June 30, 2021	(1711751)
Item 50	July 22, 2021	(1779557)

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

- 1 Date: 10/31/2020 (1779587)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

- 2 Date: 01/31/2021 (1779542)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

- 3 Date: 07/23/2021 (1711607)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 6B PERMIT
STC 9 OP
Description: Failure to perform a cylinder gas audit (CGA) as required.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
GTC OP
Description: Failure to report all instances of deviations on previous deviation reports.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.143(6)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
5C THSC Chapter 382 382.085(b)
SC 11A PERMIT
SC 2A PERMIT
STC 1A OP
STC 9 OP
Description: Failure to operate Wet/Dry Gas Flare 2 (EPN WTDYFLR2) above the minimum required net heating value.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 18E PERMIT
STC 9 OP
Description: Failure to equip each open ended valve or line (OEL) with an appropriately sized cap, blind flange, plug, or a second valve to seal the line.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.143(6)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
5C THSC Chapter 382 382.085(b)
SC 11A PERMIT
SC 2A PERMIT
STC 1A OP
STC 9 OP

Description: Failure to operate Wet/Dry Gas Flare 1 (EPN WTDYFLR1) above the minimum required net heating value.

Self Report? NO Classification: Moderate

Citation: 1A OP
30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.143(6)
5C THSC Chapter 382 382.085(b)

Description: Failure to operate a flare without visible emissions.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter B 115.112(c)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.143(6)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(3)
5C THSC Chapter 382 382.085(b)
STC 1A OP
STC 4 OP
STC 8 OP

Description: Failure to maintain recordkeeping requirements for Wastewater Tank (EPN WWTK1).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 10 PERMIT
STC 9 OP

Description: Failure to comply with thermal oxidizer operational requirements for Thermal Oxidizer 2 (EPN TO-2).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
GC 14 PERMIT
GC 8 PERMIT
SC 1 PERMIT
STC 9 OP

Description: Failure to comply with permitted emission rates for Thermal Oxidizer 2 (EPN TO-2).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 18 PERMIT
SC 28D PERMIT
STC 3Aiv1 OP

Description: Failure to perform quarterly visible emissions observations.

Self Report? NO Classification: Moderate

Citation: 23I PERMIT
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
STC 9 OP

Description: Failure to repair a leak with fifteen (15) calendar days from date of detection.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 7A PERMIT
SC 7B PERMIT
STC 9 OP

Description: Failure to comply with fuel gas requirements.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 113, SubChapter C 113.1080
30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.143(6)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YYYY 63.6145
5C THSC Chapter 382 382.085(b)
GTC OP
STC 1A OP
STC 1E OP
Description: Failure to submit notifications within the required timeframe.

F. Environmental audits:

Notice of Intent Date: 09/13/2018 (1519121)

Disclosure Date: 07/30/2019

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT 28M

Description: Failure to conduct quarterly monitoring on the LNG rundown line from Tank A to marine loading.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 18.H

Description: Failure to complete an initial repair attempt within 5 days of discovery.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 18.I

Description: Failure to make a final repair attempt within 15 days of discovery.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 18.H

Description: Failure to complete an initial repair attempt within five days of discovery.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 18.I

Description: Failure to conduct a final repair attempt with 15 days of discovery.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 18.H

Description: Failure to conduct an initial repair attempt within 5 days of discovery.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 18.I

Description: Failure to conduct a final repair attempt within 15 days of discovery.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 18.D

Description: Failure to maintain a list identifying difficult and unsafe to monitor components as required by NSR 105710.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT 18.F

Description: Failure to monitor certain LDAR components within 90 days of initial in-service date.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter C 122.221(a)

Description: Failure to obtain Title V authorization for "as-built" changes that were operated before Title V Permit O3580 was revised.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter C 122.210(a)

Description: Failure to operate a fuel dispensing facility authorized by a permit by rule greater than 12 months and prior to submitted Title V O3580 application.

Notice of Intent Date: 06/25/2020 (1664219)

No DOV Associated

Notice of Intent Date: 10/23/2020 (1691239)

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

ATTACHMENT 3

**Citizen Affidavit and
Citizen Collected Evidence**

Corpus Christi Liquefaction, Regulated Entity Number RN104104716
Corpus Christi Liquefaction LLC, Customer Number CN604136374
San Patricio County

Investigation Start Date: 03/24/2022
Investigation No. 1802723
Total Pages = 19



Refer to the
CONFIDENTIAL FILE
for Investigation No.
1802723, Attachment 3
for copies of the
Citizen Affidavit and
Citizen Collected Evidence
(Pages 2-19).

STATE OF TEXAS §
COUNTY OF Hays §

“My name is **Tim Doty**. I am of sound mind and over the age of 18, capable of making this affidavit, and the facts stated in this affidavit are within my personal knowledge and are true and correct. The TCEQ Executive Director requested that I execute this affidavit in accordance with the procedure set forth in 30 Tex. Admin. Code § 70.4. The rule concerns the TCEQ Executive Director’s use of information provided by a private individual in an enforcement action.

My mailing address is: **309 Barberry Park, Driftwood TX 78619**

I certify that I will testify in any enforcement proceeding the TCEQ Executive Director may initiate using the information I have provided in this affidavit, including enforcement proceedings pursued by the TCEQ Executive Director upon referral of the matter to the Texas Attorney General. I further understand that by signing this affidavit my name and address may be released to the general public in response to a public information act request or to the respondent as the result of a discovery request in an administrative or state court proceeding.

I certify that the information in this affidavit was not gathered illegally.

Attached hereto are **19** pages of records. The records attached are the original or exact duplicates of the original. I have personal knowledge about the occurrence of the event or condition of the site. I have verified the accuracy of the records that are provided. Any photographs or videos provided accurately reflect what I observed at the location where they were taken.

I believe these records demonstrate a violation of statutes or rules within TCEQ’s jurisdiction. The information shows:

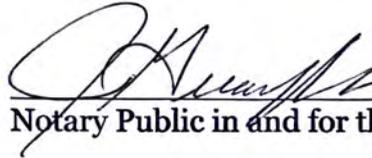
The technical information submitted, including narratives and video, show significant air emissions being released from many industrial sites around the Ingleside, Portland, Gregory and Corpus Christi areas in San Patricio and Nueces Counties. Field documentation and optical gas imaging (OGI) appear to show many emission sources including flares, vapor combustors, vent pipes, exhaust stacks, compressors, fixed-roof tanks, insulated tanks, floating-roof tanks and dock-related sources releasing excessive emissions for a variety of described reasons. A description of the documentation that I personally collected is enclosed in the document titled Ingleside and Corpus Christi, Texas Area Optical Gas Imaging Monitoring Project, Observations and Findings, December 13 - 17, 2021.



Affiant's Signature

Sworn to and subscribed before me on the **28** day of **February**, 20**22**.

**TCEQ
CONFIDENTIAL**



Notary Public in and for the State of Texas

Notary's Printed Name:

Jessica Guajardo

My Commission Expires:

11/11/2025



Ingleside and Corpus Christi, Texas Area Optical Gas Imaging Monitoring Project Observations and Findings December 13 – 17, 2021

Background

TCHD Consulting LLC was asked to conduct an optical gas imaging (OGI) monitoring project for Earthworks by conducting a representative environmental survey of various industrial facilities located around the Ingleside and Corpus Christi, Texas areas. These sites were varied and included but were not limited to chemical plants, refineries, oil export terminals, liquid natural gas terminals, iron processing plants, natural gas processing plants, liquid terminals, asphalt plants, storage tank batteries, and oil and natural gas sites. These facilities were in both San Patricio and Nueces Counties.

Project Strategy

Efforts were made to survey nine prioritized sites including Buckeye Terminals LLC – South Texas Gateway Terminal, Enbridge – Ingleside Energy Center, Flint Hills Resources – Ingleside LLC Marine Terminal, Cheniere – Corpus Christi LNG Facility, Gulf Coast Ventures – An ExxonMobil and SABIC joint venture, voestalpine Texas LLC, Oxy Occidental Chemical Corporation, Chemours Ingleside Plant, and Midstream Texas Operating LLC by land and water pending meteorological, logistical, and safety considerations. Other potential similar industries and sites in San Patricio County were assessed by land during the multi-day project as time and coordination allowed. In addition, various industrial sites along the Corpus Christi Ship Channel in Nueces County were also accessed by land. This geographic area of interest was generally located between Suntide Road to the west and the Nueces Bay Causeway to the east both north and south of the Ship Channel where many potential ambient air emission sources are located.

Efforts were made to characterize hydrocarbon and particulate matter emissions using the OGI camera. Environmental surveys were conducted off company property when monitoring from land and in Ingleside Cove, Corpus Christi Channel, Corpus Christi Bay, La Quinta Channel, and La Quinta Turning Basin when monitoring by boat. When relevant opportunities presented themselves, environmental assessments were conducted in neighborhoods where potential downwind receptors exist.

Project Findings and Observations

General project field observations began in the Ingleside and San Patricio County, Texas areas during the afternoon of December 13, 2021. Activities focused on charactering emissions from the many industrial sources within this geographic area. Mild temperatures and light northeasterly winds continued into the early morning hours of December 14, as assessments were conducted to the east and along Texas State Highway 361.

Awaking to advantageous meteorological conditions, OGI and environmental assessment field activities continued by boat on the morning of December 14. Water-based surveys were conducted east of Ingleside on the Bay from the Corpus Christi Channel to the west towards Corpus Christi Bay and the La Quinta Turning Basin. Winds were steady from the south-to-southeast eventually shifting more southerly at mid-day. Vantage points from the water allowed clear visualization of emission plumes. Land-based assessments in San Patricio County continued during the afternoon of December 14 and into the early morning hours of December 15.

Additional Ingleside, Texas OGI surveys continued along Farm Road 1069 on the morning of December 15. In early afternoon, assessments moved to the Corpus Christi, Texas area south of Tule Lake Channel, Main Turning Basin, Chemical Turning Basin, and Viola Channel. Environment assessments were conducted from Nueces Bay Boulevard to the east to Suntide Road to the west until approximately 02:00 on December 16, as winds remained steady from the south-to-southeast.

Field activities were conducted in the Ingleside, Texas area and further west toward Gregory during afternoon December 16 through the early morning hours of December 17. Southerly winds allowed for effective assessments in tracking emission plumes from origin-to-end. To conclude the project, additional OGI assessments were conducted in Nueces County on December 17, as efforts were first concentrated north of the Corpus Christi Ship Channel area along Joe Fulton International Trade and later in the Suntide Road area.

Ingleside, Texas Area

Buckeye Terminals LLC – South Texas Gateway Terminal

- **Vapor Combustors**

Located along Farm Road 1069 on the night of December 13, Mov0004 was recorded from 20:11 – 20:16 documenting significant uncombusted/partially combusted hydrocarbon being emitted from one of the four vapor combustors on site. Though heat in the combustion zone was obvious to the infrared camera, it quickly dissipated a few feet above the emission control device, as the emission plume lofted in the horizon. The video was effectively recorded in the Greyscale, Iron, and Rainbow High-Contrast (HC) Palettes and later in High-Sensitivity Mode (HSM).

The presence of excessive vapor combustor emissions from the Buckeye site was confirmed by boat on December 14 from 10:17 – 10:24. Mov0015 was mostly recorded in the Greyscale Palette and in HSM and documented uncombusted/partially combusted emissions being emitted from two hot vapor combustors on site. Emissions streamed across the horizon in the sky and was evident above several domed-roof storage tanks on site. As with the previous image, the emissions downwind of the control devices were not visible to the bare eye and were indicative of ineffective combustion when compared to similar control devices. The vapor combustors do not appear to be

properly maintained or operating as with the same efficiency as the manufacturer intends, thus permit representations do not appear to be accurate.

- Docked Ship

Continuing an OGI assessment along Farm Road 1069 on the night of December 13, Mov0005 and Mov0006 were recorded from 20:37 – 20:44 and 21:01 – 21:05, respectively. These two OGI videos that were mostly recorded in the Greyscale, Iron, and Rainbow HC Palettes and in HSM were combined into one final edited OGI video that documented uncombusted/partially combusted emissions from two exhaust vents on the mid-ship funnel and one exhaust vent on the main funnel adjacent to the ship's bridge at the stern. Emissions were not visible to the bare eye via binoculars but were being continuously emitted from the docked vessel. Docked ship emissions from the Buckeye facility are expected to directly impact San Patricio County residents including but not limited to those that inhabit the Ingleside on the Bay community.

Enbridge – Ingleside Energy Center

- Vapor Combustors

During the OGI boat survey on the morning of December 14, Mov0012 was effectively recorded in the Greyscale and Iron Palettes and in HSM. This video documented a sitewide water view of the Enbridge – Ingleside Energy Center showing a docked ship, vapor combustors, storage tanks, and spheres. The docked ship was emitting uncombusted/partially combusted hydrocarbon from its funnel, while tank fluid levels were visible via thermal capacity. Of most interest, especially in HSM, were the three hot vapor combustors that were spewing uncombusted/partially combusted emissions across the horizon at quite a distance from the source(s).

OGI Mov0017 was recorded from a boat in the Corpus Christi Channel just south of the Enbridge facility on December 14 from 10:48 – 10:55 in the Greyscale and Iron Palettes and in HSM. The image focused on prevalent uncombusted/partially combusted hydrocarbon emissions being released from two hot vapor combustors. Multiple vessels are docked including the Euronav ship to the west, though the documentation was concentrated on the vapor combustors that were not destroying emissions as efficiently as designed by the manufacturer and as represented on permits. The OGI camera's temperature range was raised to 320 degrees Fahrenheit to distinguish the heat more effectively at the tip of the combustion devices. However, despite its elevated temperature, the hydrocarbon plumes quickly lost temperature several feet above the flare tip, as the remaining hydrocarbon plume extended at quite a distance away from the two sources.

Minutes later, OGI Mov0018 was also recorded from the boat from 11:01 – 11:07. This HSM-based video documented uncombusted/partially combusted emissions being

released from three hot vapor combustors. These emissions filled the airshed as the moving plume that was not visible to the bare eye was clearly evident by OGI as the combined plume was blown across the industrial site and the undeveloped land to its west such that the plume was making impact with the Ingleside on the Bay community. The emissions were significant and indicate that the vapor combustors were not burning efficiently as designed by the manufacturer and as represented by site permits.

- **Storage Tanks**

While conducting an OGI survey along Farm Road 1069 just north of the Enbridge – Ingleside Energy Center, efforts were made to characterize potential hydrocarbon emissions being emitted from the large storage tank battery that is visible from the roadway. No emissions were detected from the front row of tanks that included the front left storage vessel that was labeled #T135. Though identifying tank numbers were not visible from the roadway, storage tanks 3 – 5 in the western-most row (behind and south of #T135) were all emitting hydrocarbon in the Ingleside airshed.

Consequently, OGI Mov0033 was recorded from 10:45 – 11:09 and documented prevalent hydrocarbon emissions being emitted from the rooftop areas of three Enbridge storage tanks. Though there was minimal thermal contrast, the presence of hydrocarbon was obvious in Manual Mode adjusted to a narrow temperature span particularly using the Rainbow HC Palette. Some hydrocarbon was documented being released from a pressure relief valve, though mostly the emissions appeared to originate from general rooftop areas instead of the engineered control devices that are supposed to be properly maintained with appropriate pressure settings and as represented in permitting actions. The presence of these pollutants directly impacted the Ingleside airshed including but not limited to the Ingleside on the Bay community during this project. Volatilization of hydrocarbon and impacts to the airshed are expected to greatly increase as ambient temperatures rise in Texas.

Flint Hills Resources – Ingleside LLC Marine Terminal

- **Storage Tank #41TK28072**

Though thermography conditions were not optimal with mild temperatures, low thermal contrast, and damp conditions, the OGI camera was used to survey various Flint Hills Resources – Ingleside LLC Marine Terminal storage tanks along Farm Road 1069 on the night of December 14. Immediately, a significant hydrocarbon plume was seen arising from the rooftop area of storage tank #41TK28072. Emissions were effectively documented in the Greyscale Palette likely from a major seal issue on the vessel. This Ingleside area emission source is not indicative of a properly maintained storage tank, thus company permitting representations are greatly understated.

- Storage Tank #41TK28080

Minutes later with minimal thermal contrast, a second Flint Hills Resources storage tank was identified as continuously releasing hydrocarbon emissions into the Ingleside, Texas airshed. Mov0031 was recorded mostly in the Greyscale Palette and HSM from 22:10 – 22:14 documenting significant emissions being released from an apparent major seal issue. The storage tank is not being properly maintained, as the documented emissions are not typical for the source type, and thus, permit emission representations are inaccurate and understated.

Cheniere – Corpus Christi LNG Facility

Because of the prevalence of emissions, Mov0010 was recorded along Texas State Highway 361 on December 13 from 23:47 – 23:50. Documented in both the Greyscale and Iron Palettes, this OGI movie documented significant hydrocarbon emissions being released from at least 17 hot vertical stacks at the Cheniere site. Though visible fog was present in the area, hydrocarbon emissions that were not visible to the bare eye or binoculars lofted in the horizon above the facility.

As a follow up from a second vantage point on the morning of December 14, two OGI videos were recorded from a boat south of the facility including Mov0020 and Mov0021 that were recorded from 11:35 – 11:40 and 11:43 – 11:44, respectively. These two movies that were recorded in the Greyscale, Iron, and Rainbow HC Palettes were combined into one final video that documented voestalpine Texas LLC emission sources in the background of the video, but significant Cheniere released emissions in the foreground. Uncombusted/partially combusted hydrocarbon emissions were being actively released from multiple Cheniere hot exhaust stacks. Though the heated emissions were released well below the 120 degrees Fahrenheit temperature setting of the camera, the slighted elevated temperatures were quickly lost to the atmosphere as the hydrocarbon plumes remained visible to the gas finding instrument across the horizon and downwind of the facility.

More advantageous meteorological conditions for conducting thermography assessments were present of the night of December 16. As a result, Cheniere was surveyed mostly in the Rainbow HC Palette and HSM from two different vantage points along Texas State Highway 361 in Mov0053 from 22:56 – 23:01 and in Mov0054 from 23:06 – 23:12. These two OGI videos were combined into one final edited OGI video that documents a streaming uncombusted/partially combusted flare plume that was released into the atmosphere at quite a distance and was not visible to the bare eye. Though the flare was hot per the rise in the temperature scale of the camera, the hydrocarbon plume quickly lost temperature as is streamed away from the combustion device. Most significant, however were the abundance of emissions that originated from 18 hot vertical stacks. This large, combined hydrocarbon plume filled the entire horizon over the industrial site and blew far downwind over the Cities of Ingleside, Portland, and Gregory.

Gulf Coast Growth Ventures – An ExxonMobil and SABIC joint venture

Located in western San Patricio County along County Road 1612, two OGI videos were recorded at the Gulf Coast Growth Ventures – ExxonMobil and SABIC infrastructure build and development site during the afternoon of December 14 from two different vantage points. Mov0024 was documented looking toward the north and east, while Mov0025 was documented looking toward the south and east when the two videos were recorded from 15:35 – 15:40 and 15:47 – 15:51, respectively. Each of these images that were primarily recorded in the Greyscale and Iron Palettes, depict three capped hot exhaust stacks releasing emissions, as well as four apparent hot boiler stacks that were adding uncombusted/partially combusted emissions to the airshed. Two very hot vertical flares with visible flames were also releasing uncombusted/partially combusted emissions to the horizon, along with various other heated emission sources within the facility.

Because of its state of construction, this industrial site was not assessed beyond the recording the two OGI videos on December 14. However, it should be noted this facility contains a large ground flare that was burning out of control on the night of December 16 and during the early morning hours of December 17. In those instances, the industrial facility's ground flare was visible along Texas State Highway 361 in Ingleside some 7.5 miles distant from the industrial site, as the light from the ground flare was tracked back to the source via its energy signature.

Plains Pipeline LP – Taft Station

Using the OGI camera to survey a storage tank battery west of the Portland and Gregory, Texas area during late afternoon December 14, hydrocarbon emissions were immediately documented from a vantage point along Farm-to-Market Road 893 in Mov0026 from 16:11 – 16:18 and from a second vantage point along County Road 2004 in Mov0027. Because these two monitoring locations were in proximity and documented similar emissions from Plains Pipeline LP – Taft Station storage tank #27100, one final combined video was edited to document the hydrocarbon emissions. The videos were recorded in the Rainbow HC Palette and in the Manual Mode with a narrow temperature span and documented steady rooftop hydrocarbon emissions that were be actively released to the atmosphere. The location and behavior of the gas indicates a likely storage tank seal issue that is not compliant with the company's permit representations or in minimizing the release of hydrocarbon gases to the atmosphere.

Midstream Texas Operating LLC

- **First Insulated Storage Tank**

Despite low thermal contrast, Mov0028 was recorded along Farm-to-Market Road 2725 on December 14 from 20:51 – 20:55. Documented in a variety of palettes including Greyscale, Iron, Rainbow, and Lava, this OGI video shows hydrocarbon being released from the center rooftop area of an insulated storage tank. The temperature span

showed that the plume was unheated with an estimated semi-quantitative temperature in the mid-60's.

- **Second Insulated Storage Tank**

With continuing low thermal contrast, Mov0029 was recorded on late evening December 14. Documented in Greyscale and Rainbow HC Palettes, emissions from this storage tank were most effectively documented while in the Manual Mode during the timeframe of 21:01 – 21:06. Hydrocarbon emissions were visible with the OGI camera rising above the storage tank and originating from the rooftop area in the left portion of the image. Hydrocarbon emissions were not visible to the bare eye with or without binoculars. The intensity and apparent quantity of these emissions is likely not permitted by the TCEQ and should be followed up on through a thorough investigative process.

voestalpine Texas LLC

This industrial plant was built in 2016 to produce Hot Briquetted Iron, a feedstock used to produce high-quality grades of steel. The facility uses natural gas as a reduction agent and advertises that it and iron oxides are the only raw materials at the site. A basic field site visit along a public roadway on the afternoon of December 16 documented an active plant with product and material piles, a cooling tower, material conveyors, exhaust stacks, and a tall vertical structured exhaust stack. Various digital pictures were collected at approximately 15:00 including multiple views of a long white steam plume being emitted from the tall vertical structured exhaust stack. This steam was visual to the bare eye and binoculars.

About an hour later while surveying along Texas State Highway 361, the OGI camera was used to assess the voestalpine facility's tall vertical structured exhaust stack. Recorded from 16:11 – 16:20, Mov0050 shows a long streaming steam plume extending for quite a distance from the emission source. Despite steam being visual to the bare eye, the OGI camera detected an apparent second emission stream within the white-colored steam. Using primarily the Greyscale and Iron Palettes but evaluating them all, this second plume was visual in all camera palettes used indicating that it was lower in temperature than the rest of the steam. This cooler emission stream hidden within the white steam extended far into the horizon traveling north of Texas State Highway 361.

After further assessing this plume from a different vantage point to confirm observations, the steam plume was viewed from the same physical location as obtained in the earlier digital photo that documented a white steam plume. At approximately 17:00, multiple digital photos documented that the plume was no longer white, as much of the plume appeared to be a muted grey color. Visual evidence confirmed the findings of the OGI video that was recorded – the voestalpine facility appears to be mixing separate emission plumes within the steam resulting in streaming emissions that impact the local airshed and potential downwind receptors.

Oxy Occidental Chemical Corporation

While continuing to assess various industrial sites that were visible from Texas State Highway 361 on the night of December 16, OGI video Mov0051 was recorded from 21:38 – 21:46 showing a sitewide look of the Oxy Occidental Chemical Corporation facility. The recording in a variety of palettes including Greyscale, Iron, Lava, and Rainbow HC documented real-time conditions of spheres, storage tanks, a cooling tower, and multiple heated exhaust stacks. Fluid levels were visible via thermal capacity in multiple storage tanks. Steam was visible to the bare eye and was being emitted from multiple areas within the plant including but not limited to the cooling tower.

Though exhaust stacks were emitting heated hydrocarbon emissions, they were well within the temperature range of the camera. Several hydrocarbon emission plumes were visible to the OGI instrument well downwind of multiple exhaust stack emission source(s), thus pollutants were being actively added to the San Patricio County airshed. Hydrocarbon emissions were prevalent and converged with the steam to help transport constituents far beyond the company's property line. Emissions were excessive downwind of this site and likely exceeded permit representations.

Chemours Ingleside Plant

Again, located along Texas State Highway 361, the OGI camera was used to survey the Chemours facility late night on December 16. The sitewide assessment in Mov0052 was recorded in the Greyscale, Iron, and Rainbow HC Palettes from 22:08 – 22:13 and documented two vertical exhaust stacks, four platform exhaust stacks, two spheres, a cooling tower, and a ground flare. Though there was a hot compressor releasing emissions adjacent to the ground flare, thermography indicated that the ground flare was not combusting emissions at the time of assessment. Steam visual to the bare eye and to the OGI camera was being actively released by the cooling tower, while the two spheres were two different temperatures evidenced via thermography. All six exhaust stacks were heated, but color palettes indicated that the semi-quantitative top end temperature were less than 100 degrees Fahrenheit as emissions were being released. Emissions were blowing from left to right within the image, as uncombusted hydrocarbon was actively being added to the airshed.

Vopak Terminal

Located in the Portland, Texas area near Corpus Christi Bay, the Vopak Terminal was assessed with an OGI camera late night on December 16. Filmed from 23:53 – 23:58 mostly in the Rainbow HC Palette, Mov0055 shows a sitewide look at six storage tanks, two spheres, and a docked ship. Both spheres were approximately half-full determined via thermal capacity of the contents. Though the large storage tank appeared to continuously release hot emissions during much of the video, a change in position documented that the docked ship was continuously releasing uncombusted/partially combusted hydrocarbon via its funnel, as opposed to the storage tank.

Oxy Occidental Chemical Corporation, Chemours Ingleside Plant, and Cheniere – Corpus Christi LNG Facility (Sitewide Night View)

Three OGI videos were recorded along Texas State Highway 361 during late night December 13. Mov0007, Mov0008, and Mov0009 were recorded from 22:55 – 22:59, 23:16 – 23:20, and 23:30 – 23:35, respectively and documented site-wide conditions at the Oxy, Chemours, and Cheniere facilities. These three videos were edited and combined into one video that depicts real-time conditions during the time of documentation.

Stagnate winds and visible moisture in the air made thermography challenging, though the combined video did identify multiple emission sources at the industrial facilities. Steam and fog were visible to the bare eye and were documented in digital photographs and in the OGI videos recorded mostly in the Greyscale Palette.

In surveying from the east to the west (left to right in the video), multiple domed-storage tanks were present, along with uncombusted/partially combusted ground-flare emissions and multiple hot exhaust stacks at the Oxy facility. Minutes later, a further assessment further west documented continuing significant emissions being released and filling the horizon from multiple vertical exhaust stacks at the Chemours facility. Soon afterwards, Cheniere emissions were documented in both Greyscale and Iron Palettes being emitted from at least 16 hot vertical stacks.

Enbridge – Ingleside Energy Center and Flint Hill Resources – Ingleside LLC Marine Terminal

While located on a boat along the Corpus Christi Channel on December 14, Mov0013 was recorded from 09:38 – 09:43 showing a sitewide look at the Enbridge – Ingleside Energy Center and Flint Hills Resources – Ingleside LLC Marine Terminal. Recorded mostly in the Greyscale Palette and HSM, it documented multiple docked ships including but not limited to the Hong Kong-based New Comfort and multiple other emissions sources. The OGI video shows uncombusted/partially combusted emissions being released from multiple vapor combustors and HSM-documented probable emissions from the rooftop area of Flint Hills' Tank 41TK28071.

Cheniere – Corpus Christi LNG Facility and Oxy Occidental Chemical Corporation

While conducting an OGI survey from a boat on December 14, Mov0023 was recorded from 12:04 – 12:07 showing ongoing activities at both the Cheniere – Corpus Christi LNG Facility and the Oxy Occidental Chemical Corporation. Cheniere was actively releasing heated hydrocarbon emissions from a group of five vertical exhaust stacks and another two exhaust stacks to the east. Steady and abundant uncombusted/partially combusted emissions were being released from two vapor combustors with a low heat profile that did not appear to have a combustion efficiency that meets the manufacturer's specifications or TCEQ permit representations.

Cheniere – Corpus Christi LNG Facility and voestalpine Texas LLC

Located along a public roadway near the entrance to the voestalpine facility, Mov0056 was recorded on December 17 from 00:02 – 00:05. This Rainbow HC Palette image is a documented sitewide look at both the Cheniere and voestalpine industrial sites. Cheniere was actively releasing uncombusted/partially combusted hydrocarbon from at least 18 heated vertical exhaust stacks. The emissions were significant and greatly added pollutants to the airshed, as documentation showed that the emission plumes extended north beyond Texas State Highway 361. The voestalpine facility was also active, as the cooling tower and multiple exhaust stacks, including the tall vertical structure, were emitting both visual steam and hydrocarbon/particulate matter emissions that accompany the steam.

Corpus Christi, Texas Area**Citgo East Refinery**

- **Storage Tank #2002**

The Citgo East Refinery along Buddy Lawrence Drive has long been a source of persistent emissions in the Corpus Christi area. First located at a site adjacent to storage tank #2002, the storage vessel was obviously undergoing maintenance. At least four workers were on top of the tank painting the rooftop with extension rollers and compressors. The activities were visible to the bare eye, as were the multiple steam plumes that were evident in the background. Despite this activity, Mov0036 was recorded from 16:00 – 16:14, while Mov0037 was filmed a few minutes later from 16:24 – 16:27 at a different site a bit further south.

Since these two movies documented the same emission source from two different vantage points, they were combined into one edited OGI video. This combined video documents a complex thermography scene with continuously moving steam and ongoing maintenance activities on top of the tank. Moreover, the OGI video also documented a flock of birds flying around and near the storage tank. Despite the complexity of the image, the storage tank appeared to be continuously emitting a steady stream of hydrocarbon near its southern rim on the right side of the video. Recorded in the Rainbow HC and Greyscale Palettes, the hydrocarbon emissions were excessive and uncontrolled. This hydrocarbon plume needed to be accurately represented, reported, and controlled to minimize emissions.

- **Storage Tank #5008**

Surveying away from the Citgo refinery itself but along Valero Way, approximately 0.25 mile north of Interstate 37 on early morning December 16, it quickly became evident that hydrocarbon emissions were being released from storage tank #5008. Recorded from 00:55 – 00:59 in the Rainbow HC Palette, Mov0047 documented steady

hydrocarbon emissions from the rooftop of floating roof tank #5008. The image documented significant emissions being released from the top of the storage tank that indicates that the seal is malfunctioning and is not operating as the manufacturer intends, thus permitting representations are not correct.

- **Storage Tank #5006**

Minutes later and a bit further north along Valero Way, the OGI camera was able to detect more hydrocarbon emissions being released from storage tank #5006 that were not visible to the bare eye. Consequently, Mov 0048 was recorded in the Rainbow HC Palette from 01:12 – 01:15 on the morning of December 16. Much like the previous documentation on storage tank #5008, storage tank #5006 appears to have a seal problem with an open gap(s) that allows hydrocarbon to vent continuously even during times of mild temperatures with minimal volatilization. The tank is not being operated in a manner to minimize emissions or as the manufacturer intended. Emissions are not being properly controlled or represented.

Valero East Plant

- **Storage Tank #94**

Documented from two different vantage points along Up River Road on the evening of December 15, OGI Mov0038 was recorded from 17:02 – 17:06, while Mov0041 was collected from 18:41 – 18:44. Both movies were combined into one final video because they each documented hydrocarbon emissions being emitted from the Valero – Bill Greehey Refineries East Plant.

Recorded in the Rainbow HC and Greyscale Palettes, this video shows fixed-roof storage tank #94 continuously emitting hydrocarbon from a pressure relief valve. Under mild temperatures and a low volatilization rate, field observations documented that the tank was continuously emitting hydrocarbon for some 1.5 hours. It appears that this tank is not being properly maintained, as the pressure relief valve does not have a proper pressure setting to minimize emissions, and/or there is a mechanical malfunction/seal issue with the control device. Regardless, these hydrocarbon emissions have not been accurately represented in permitting actions and are causing/contributing to a condition of air pollution.

- **Black Storage Tanks**

A Valero OGI assessment was conducted along Cantwell Lane on the evening of December 15. Located approximately 0.85 mile north of Up River Road, the OGI camera was used to survey various infrastructure and storage tanks that lie adjacent to the roadway. Mov0039 was recorded from 18:01 – 18:04 and documented continuous hydrocarbon emissions being vented from two different black storage tanks. Though no

identifying tank numbers were visible from the roadway, emissions were not visible to the bare eye. As a result of observations, the OGI video was recorded in the Rainbow HC Palette that allowed for maximum visualization of the hydrocarbon emissions.

Semi-quantitative temperature information indicated that although the emissions were a bit heated, they were being released to the atmosphere around 70 degrees Fahrenheit. The black tank on the left side of the image continuously released hydrocarbon from one of its pressure relief valves but not all. Something seems amiss because there appear to be mechanical malfunctions/seal issues with other pressure relief valves, or the one valve's pressure setting is not correct. Moreover, the black insulated tank wall is falling off the storage tank, thus it is not being properly maintained causing emissions to not be minimized per permitting representations. The second black tank in the right part of the video is also continuously releasing hydrocarbon to the atmosphere like the first. Valero appears to not be maintaining its tanks as permitted, as the storage vessels are continuously adding hydrocarbon to the airshed.

- **Storage Tank #110 and #109**

Parked along Up River Road just north of a residential neighborhood on the evening of December 15, thermography made it possible to detect excessive hydrocarbon emissions being released from a Valero storage tank battery. Mov0040 was recorded in Rainbow HC Palette from 18:26 – 18:34 showing the continuous rim-area emissions of floating storage tank #110 in the left portion of the video, and rooftop emissions from fixed-roof storage tank #109 to the right of it. The rim emissions are indicative of a seal problem that does not meet gap requirements on storage tank #110. In the case of storage tank #109, there are rooftop emissions but no apparent emissions being released from the designated pressure relief valve and/or top vents. Neither one of these tanks appear to be properly maintained, as emissions are excessive and continuous, thus permitting representations do not appear accurate.

- **Storage Tank #350**

Located on McBride Lane, approximately 500 feet north of Up River Road, this Valero facility was surveyed with an OGI camera during the night of December 15. Immediately, upon assessing the storage tank battery that was adjacent to the roadway, hydrocarbon emissions were detected by the instrument. Though not visible to the bare eye, hydrocarbon emissions were detectable via, as they were being continuing released from the rim area of fixed-roof storage tank #350. Mild temperatures made for minimal volatilization conditions, but emissions were prevalent regardless. Emissions exceeded that of similar source types under similar conditions and did not appear to be emitted from the designated pressure relief valve. Therefore, it is probable that the pressure relief valve is not working as the manufacturer intended and as represented in permits.

- Unknown Storage Tank Number

Using the OGI instrument along Up River Road, approximately 150 feet west of McBride Lane, various Valero infrastructure and storage tanks were assessed. Though some steam was visible near the top of a storage tank (the identifying number was not visible), hydrocarbon emissions were detected by the camera over and beyond the visible steam. Consequently, Mov0042 was recorded from 19:57 – 20:00 documenting continuous hydrocarbon emissions being emitted from the vessel. Semi-quantitative thermography data indicates that the exterior of the storage vessel was around 100 degrees Fahrenheit, while the emission plume was approximately 20 degrees Fahrenheit cooler. It is not definitely known if the fluid contents were a slightly elevated temperature as a result of the sun's radiant energy, industrial processing, and/or from the resultant radiant energy that was emitted from the adjacent hot vapor combustor that could have been increasing the temperature of the tank wall, and thus the fluid temperature contained within.

- Flare

While located north of the Main Turning Basin of the Corpus Christi Ship Channel and driving west along the East Navigation Boulevard, the OGI camera detected a flare with streaming uncombusted/partially combusted hydrocarbon emissions that were not visible to the bare eye. Consequently, Mov0057 was recorded from 13:26 – 13:32 and documented a poorly combusting flare with streaming emissions that moved from mostly east to west across the horizon. This initial temperature range was appropriate to detect the uncombusted/partially combusted emissions, though it was raised a bit to better discern characteristics of the flare tip. The video was mostly recorded in the Greyscale Palette and HSM and documented a control device that is not be operated with the same efficiency as what the manufacturer designed, thus emissions are exceeding permitting representations because the waste control device is not being properly operated and/or maintained.

Buckeye Texas Processing LLC

Continuing to conduct environmental assessments in the industrial sector of Corpus Christi, multiple Buckeye Texas Processing LLC storage tanks were surveyed on late night December 15. Paused on Southern Minerals Road approximately 750 yards north of Interstate 37, Mov0044 was recorded in HSM and the Rainbow HC Palette from 22:51 – 22:53. This one image documented hydrocarbon emissions being emitted from two different storage tanks. Tank #1005 was on the left, while Tank #1007 was located on the right. Both storage tanks were emitting hydrocarbon from the rooftop areas of the storage vessels and not from apparent pressure relief valves. These emissions were continuous with mild ambient temperatures, thus volatilization should have been at a minimum. These storage tanks do appear to be maintained as represented in permitting actions nor to minimize emissions that are released to the surrounding airshed.

Valero Asphalt Terminal

Though visible steam was present at the Valero Asphalt Terminal that is located along Up River Road, multiple storage tanks with potential to emit hydrocarbon are located within the facility. The OGI instrument detected multiple storage tanks that were actively releasing plumes that were not visible to the bare eye during the survey. Mov0045 was recorded from 00:21 – 00:24, while Mov0046 was recorded from 00:26 – 00:28. Steady hydrocarbon emissions were detected being released from a pressure relief valve on a medium-sized insulated storage tank located beyond the loading area, while a smaller storage more to the front of the facility was also continuously releasing hydrocarbon from its rooftop pressure relief valve.

One final combined OGI video was produced that documented both emission sources via the Rainbow HC Palette. Though the exterior wall of the storage tanks had a semi-quantitative temperature measure around 100 degrees Fahrenheit, the emissions themselves were being emitted with an apparent temperature of around 80 degrees Fahrenheit. Though the emissions were emitted above ambient temperature, they lost heat quickly and hydrocarbon plumes remained visible to the infrared camera. This storage tank battery is a consistent hydrocarbon source that adds pollutants to the Corpus Christi, Texas airshed.

Howard Energy Partners – Maverick Terminal Corpus Christi

Located at 4669 Joe Fulton Corridor, the Howard Energy Partners – Maverick Terminal Corpus Christi facility is a tank battery that is located just north of the Main Turning Basin of the Corpus Christi Ship Channel. Multiple storage tanks were surveyed with the OGI camera on the afternoon of December 17, as there were no visible emissions to the bare eye. Mov0058 was recorded in the Rainbow HC and Greyscale Palette from 13:57 – 14:00 using a narrow temperature span in the Manual Mode. Intermittent hydrocarbon emissions were being released from the rooftop of storage tank #80-8 near the top of the stairwell.

Flint Hills Resources – Corpus Christi Complex West Plant

- **Storage Tank #15FB512**
Using an OGI camera along Up River Road, approximately 0.2 mile east of North Clarkwood Road during mid-afternoon on December 17, it was quickly obvious that storage tank #15FB512 was emitting hydrocarbon from multiple vents. As a result, Mov0062 was filmed from 15:31 – 15:34 in the Greyscale and Rainbow HC Palettes documenting the continuous emissions. Considering temperatures were very mild, volatilization of hydrocarbons is only expected to increase as ambient conditions become warmer. These emissions were more prevalent than that of similar fixed-roofed storage tanks during mild meteorological conditions.

- Storage Tank #08FB101

An OGI assessment along Suntide Road allowed the detection of hydrocarbon emissions that were being released from a Flint Hill Resources – Corpus Christi West Plant storage tank. Emissions were not visible with the bare eye but were documented in Mov0063 that was recorded in Rainbow HC from 15:51 – 15:53. Though meteorological conditions were shifting during this assessment, the rooftop hydrocarbon emissions that were detected from storage tank #08FB101 were abundant. The hydrocarbon plume was being blown from left to right and appeared to not be emitted by the designated pressure relief valve because of an incorrect pressure setting, non-functioning seal and/or poor maintenance, thus permitting representations are likely not accurate for the emission source.

Flint Hills Resources – East Plant

- Storage Tank #E11TKS6

Surveying around the Flint Hill Resources – East Plant in Corpus Christi on the afternoon of December 15, led to the identification of a storage tank that was releasing hydrocarbon near Ebony Street and Interstate 37. OGI Mov0035 was recorded from 14:23 – 14:29 in Rainbow HC, Greyscale, and Iron Palettes documenting the continuous release of hydrocarbon emissions from the rooftop area of storage tank #E11TKS6. Field observations detected that there were no visible emissions to the bare eye from this large floating-roof tank. The OGI camera documented that the abundance of emissions was related to a seal issue, as the plume was blown from right to left within the video itself.

Mostly documented in the Rainbow HC and Greyscale Palettes, Mov0064 was recorded on December 17 from 16:49 – 16:51. This OGI video confirmed that storage tank #E11TKS6 was leaking hydrocarbon from an apparent serious seal problem. These emissions are not reflective of a properly maintained storage vessel that is represented on permitting actions. These hydrocarbon emissions would be expected to have a direct negative impact on the airshed of various residential areas adjacent and downwind of this storage tank.

- Storage Tank #E11TKS7

Minutes after documenting storage tank #E11TKS6 seal issues, additional hydrocarbon emissions were visible via thermography along Nueces Bay Boulevard. Consequently, Mov0065 was recorded mostly in HSM and the Rainbow HC and Lava Palettes from 16:56 – 16:58 showing continuous seal emissions from storage tank #E11TKS7. These significant emissions are being released adjacent to residential neighborhoods from a poorly maintained tank whose permitting representations are incorrect.

Flint Hills Resources – Refined Petroleum Product

As field activities were wrapping up, a final OGI survey was conducted along Corpus Christi Refinery Row in Nueces County. Immediately, the OGI camera detected a minimal heat signature at the top of an operational vapor combustor. Mov0066 was recorded from 17:18 – 17:25 and documented a continuous stream of uncombusted/partially combusted hydrocarbon being emitted from the poorly combusting waste control device mostly in the Rainbow HC, Iron, and Greyscale Palettes and HSM. The vapor combustor was not operating with a high combustion efficiency as designed and as presented on permitting actions, thus representations are inaccurate until modifications and maintenance activities are conducted.

Unknown Oil and Gas Storage Tank Battery

Located north of the Corpus Christi Chemical Turning Basin and along Joe Fulton International Trade roadway, an oil and/or natural gas tank battery was assessed with the OGI camera on the afternoon of December 17. Three videos were collected, but Mov0061 that was recorded in the Greyscale, Iron, and Rainbow Palettes from 14:39 – 14:43 is the most effective documentation of the emission source(s). Though there was a truck on-site at the beginning of the survey, streaming hydrocarbon emissions were very evident even after the vehicle left the site. Emission characteristics were not typical of the source type and did not appear to be released from a designated pressure relief valve indicating potential operational and/or maintenance issues at the site resulting in inaccurate permitting representations. Though binoculars allowed the identification of the emission source(s), the name of the site was not identifiable from the public roadway.

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 8, 2022

Mr. Ari Aziz
Vice President & General Manager
Corpus Christi Liquefaction, LLC
622 Highway 35
Gregory, Texas 78359

Via Email

Re: Results of a Complaint Investigation at:
Corpus Christi Liquefaction (Cheniere), 622 State Highway 35, Gregory (San Patricio County),
Texas; Regulated Entity No.: 104104716; Investigation No.: 1802723; Incident Nos.: 375870,
375905, 375910, 375913, and 375916

Dear Mr. Aziz:

On March 24, 2022, Ms. Cindy Smith and Mr. Tristan Rieger of the Texas Commission on Environmental Quality (TCEQ) Corpus Christi Region Office conducted an investigation of the above referenced regulated entity to evaluate compliance with applicable requirements for air quality. No violations were documented during this investigation.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding this matter, please feel free to contact Ms. Smith in the Corpus Christi Region Office at (361) 881-6900.

Sincerely,

A handwritten signature in black ink that reads "Guadalupe Lopez".

Guadalupe "Sonny" Lopez
Air Section Work Leader
Corpus Christi Region Office

SL/CGS/mjc

Enclosures: "The TCEQ Has Inspected Your Business" (RG-344)