

Texas Commission on Environmental Quality Investigation Report

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Customer: Corpus Christi Liquefaction, LLC
Customer Number: CN604136374

Regulated Entity Name: CORPUS CHRISTI LIQUEFACTION

Regulated Entity Number: RN104104716

Investigation # 1819375	Incident Numbers 377971
Investigator: COLE CASTLEBERRY	Site Classification GREENHOUSE GAS PSD CASE-BY-CASE
Conducted: 06/07/2022 -- 06/07/2022	NAIC Code: 221210 SIC Code: 4925
Program(s): AIR NEW SOURCE PERMITS	
Investigation Type: Compliance Invest File Review	Location:
Additional ID(s): GHGPSDTX123M1 105710	
Address: 622 HWY 35, GREGORY, TX , 78359	Local Unit: REGION 14 - CORPUS CHRISTI Activity Type(s): OG - Oil and Gas - AIR QUALITY High Level UML3IH - AIR UML3IH - IN HOUSE UPSETMAINTENANCE LEVEL 3

Principal(s):

Role	Name
RESPONDENT	CORPUS CHRISTI LIQUEFACTION LLC

Contact(s):

Role	Title	Name	Phone
REGULATED ENTITY MAIL CONTACT	VICE PRESIDENT AND GENERAL MANAGER	MR ARI A AZIZ	Phone (361) 977-1310
REGULATED ENTITY CONTACT	SR. ENVIRONMENTAL COORDINATOR	MR ROGER M BENNETT	Work (361) 977-1383
PARTICIPATED IN	OFFICE OF COMPLIANCE AND ENFORCEMENT SPECIAL ASSISTANT	MS CYNTHIA GANDEE	Work (512) 239-0179 Work (713) 767-3762

Other Staff Member(s):

Role	Name
QA Reviewer	CRYSTAL CHALOUPKA
Supervisor	GUADALUPE LOPEZ
Supervisor	KELLY RUBLE

Associated Check List

Checklist Name

AIR EMISSIONS EVENTS FOR UNPLANNED MSS
(ON OR AFTER 01/05/2006)

Unit Name

Incident No. 377971

Investigation Comments:

INTRODUCTION

On June 7, 2022, Mr. Cole Castleberry, Texas Commission on Environmental Quality (TCEQ) Corpus Christi Region 14 (R14) Air Section Environmental Investigator (EI), conducted an in-house Upset/Maintenance Level 3 (UML3IH) investigation to determine compliance with the emissions event rules found in Title 30 Texas Administrative Code (30 TAC) §101.222 in response to an incident notification (Incident No. 377971) submitted by Corpus Christi Liquefaction (CCL). CCL is located at 622 Highway 35, Gregory, San Patricio County, Texas. The regulated entity (RE) contact for this investigation was Mr. Roger Bennett - Sr. Environmental Coordinator. The RE mail contact for this investigation was Mr. Ari Aziz - Vice President and General Manager of CCL Operations.

Incident No. 377971 occurred from April 15 to April 16, 2022 at the Emission Point Numbers (EPNs) Marine Flare (MRNFLR), Wet/Dry Gas Flare 1 (WTDYFLR1), and Wet/Dry Gas Flare 2 (WTDYFLR2) for a duration of 19 hours. The initial incident notification was submitted in a timely manner electronically via State of Texas Environmental Electronic Reporting System (STEERS) on April 15, 2022. The final report was submitted in a timely manner on April 29, 2022 via STEERS. Refer to Attachment 1 for copies of the initial and final incident reports.

Daily Narrative:

Streamlining questions were emailed to Mr. Bennett by Ms. Cynthia Gandee - TCEQ Office of Compliance and Enforcement Special Assistant on May 6, 2022. The deadline for receipt of the requested information was June 6, 2022. The information was received on June 2, 2022. Refer to Attachment 2 for a copy of CCL's response.

According to the information provided by CCL, on April 15, 2022 at 7:21 a.m., CCL suffered a third-party power interruption that led to an emergency shutdown of the facility. The interruption was the result of a commercial power transmission line trip caused by failed insulators on an external provider's power lines. Incident No. 377971 was submitted to authorize the subsequent startup activities that took place from April 15 to April 16, 2022.

The demonstration criteria of 30 TAC §§101.222(a) and (b) were used to evaluate Incident No. 377971 to determine if the RE was entitled to an affirmative defense for all claims in enforcement actions for the unauthorized emissions. The six criteria of 30 TAC §101.222(a) were reviewed, and it was determined that this EE did not meet the criteria to be deemed excessive. The eleven criteria of 30 TAC §101.222(b) were reviewed, and it was determined that the EE met all the applicable demonstrations criteria and is therefore subject to an affirmative defense.

Exit Interview:

An Exit Interview Form (EIF) was provided to Mr. Bennett on June 7, 2022. The EIF notified Mr. Bennett that CCL had met affirmative defense for Incident No. 377971 and no violations were being pursued. Refer to Attachment 3 for a copy of the EIF.

GENERAL FACILITY AND PROCESS INFORMATION

Process Description:

CCL 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 facility's marine terminal. The CCL 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 it out into the pipeline system. The primary Standard Industrial Classification (SIC) code for the Regulated Entity is 4925. A detailed process description can be found in the TCEQ R14 Air Section files.

BACKGROUND

Performance Classification and Compliance History Rating:

Corpus Christi Liquefaction, LLC (CN604136374)

Classification: Satisfactory

Rating: 2.24

Corpus Christi Liquefaction (RN104104716)

Classification: Satisfactory

Rating: 2.24

Note: 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:

There were no Agreed Orders issued by the TCEQ during the five years prior to this compliance period:

Prior Enforcement Issues:

Based on a review of TCEQ R14 databases, there were four air-related Notices of Violation (NOVs) issued to CCL during the past five years. Refer to Investigation Nos. 1581779, 1664747, 1670275, and 1711607 for further information.

Complaints:

There were seven air-related complaints alleged against CCL and investigated by the TCEQ R14 Office during the past two years.

ADDITIONAL INFORMATION

Conclusions, Recommendations and Current Enforcement Actions:

It was determined this event met the demonstration criteria necessary to present an affirmative defense for the unauthorized emissions that resulted from this incident.

ATTACHMENTS

1. Initial Notification and Final Report
2. CCL Response
3. EIF

No Violations Associated to this Investigation

Signed



Environmental Investigator

Date 6/8/2022

Signed



Supervisor

Date 06/16/2022

Attachments: (in order of final report submittal)

Enforcement Action Request (EAR)

Letter to Facility (specify type) : _____

Investigation Report

Sample Analysis Results

Manifests

Notice of Registration

Maps, Plans, Sketches

Photographs

Correspondence from the facility

Other (specify) :

See attachment list on page 3 of 4.



ATTACHMENT 1

Initial Notification and Final Report

Corpus Christi Liquefaction, LLC

Corpus Christi Liquefaction

RN104104716

San Patricio County

Investigation No. 1819375

June 7, 2022

Attachment Total Pages = 7

Confirm Initial Notification to Send to TCEQ
Regulated Entity: RN104104716 Today's date is: 04/15/2022

Incident Tracking Number:		Incident Status:	OPEN
Submittal Type:	INITIAL NOTIFICATION		
Name of Owner or Operator:	CORPUS CHRISTI LIQUEFACTION LLC	Regulated Entity Number:	RN104104716
Physical Location:			
Event/Activity Type:	AIR STARTUP		
Date and Time Event Discovered or Scheduled Activity Start:	04/15/2022 @ 10:00		
Event Duration:	24 hours, 0 minutes		

Process Unit or Area Common Names
Train 1
Marine Flare
Train 3
Train 2

Facility Common Name	Facility Identification Number (FIN)
Process 1	PRCSS1
Marine Process	PRCSSMRN
Process 2	PRCSS2
Process 3	PRCFF3

Emission Point Common Name:	Emission Point Number:
Marine Flare	MRNFLR

List of Air Contaminant Compounds					
Description	Est. Quantity/ Opacity	Units	Emission Limit	Units	Authorization
Oxides of Nitrogen (NOx)	2000.00	POUNDS	106.23	LBS/HR	NSR Permit 105710
Carbon Monoxide	11000.00	POUNDS	909.72	LBS/HR	NSR Permit 105710
VOC (unclassified)	500	POUNDS	7.85	LBS/HR	NSR Permit 105710
Sulfur dioxide	10.00	POUNDS	.01	LBS/HR	NSR Permit 105710
Hydrogen Sulfide	10.00	POUNDS	.01	LBS/HR	NSR Permit 105710
Methane	20000.00	POUNDS	666	TONS/YR	GHGPSDTX123
Ethane	500.00	POUNDS	0		N/A
Propane	500.00	POUNDS	7.85	LBS/HR	NSR Permit 105710

Emission Point Common Name:	Emission Point Number:

Wet/Dry-Flare 2	WTDYFLR2
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List of Air Contaminant Compounds
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Description	Est. Quantity/ Opacity	Units	Emission Limit	Units	Authorization
Carbon Monoxide	30000.00	POUNDS	283.93	LBS/HR	NSR Permit 105710
Ethane	100.00	POUNDS	0		NA
Ethylene	5000.00	POUNDS	61.26	LBS/HR	NSR Permit 105710
Hydrogen Sulfide	500.0	POUNDS	0.01	LBS/HR	NSR Permit 105710
Isobutane	500.0	POUNDS	61.26	LBS/HR	NSR Permit 105710
Isopentane	500.0	POUNDS	61.26	LBS/HR	NSR Permit 105710
Methane	20000.00	POUNDS	1485	TONS/YR	GHGPSDTX123
Oxides of Nitrogen (NOx)	15000	POUNDS	71.29	LBS/HR	NSR Permit 105710
Propane	5000.00	POUNDS	61.26	LBS/HR	NSR Permit 105710
Sulfur dioxide	100.00	POUNDS	0.81	LBS/HR	NSR Permit 105710
VOC (unclassified)	500.00	POUNDS	61.26	LBS/HR	NSR Permit 105710
n-butane	500.00	POUNDS	61.26	LBS/HR	NSR Permit 105710
n-pentane	50.00	POUNDS	61.26	LBS/HR	NSR Permit 105710

Emission Point Common Name:	Emission Point Number:
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Wet/Dry Gas Flare 1	WTDYFLR1
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List of Air Contaminant Compounds
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Description	Est. Quantity/ Opacity	Units	Emission Limit	Units	Authorization
Carbon Monoxide	30000.00	POUNDS	283.93	LBS/HR	NSR Permit 105710
VOC (unclassified)	500.00	POUNDS	61.26	LBS/HR	NSR Permit 105710
Ethane	500.00	POUNDS	0		N/A
Oxides of Nitrogen (NOx)	15000.00	POUNDS	71.29	LBS/HR	NSR Permit 105710
Methane	20000.00	POUNDS	1485	TONS/YR	GHGPSDTX123
Propane	5000.00	POUNDS	61.26	LBS/HR	NSR Permit 105710
Ethylene	500.00	POUNDS	61.26	LBS/HR	NSR Permit 105710
Isobutane	500.00	POUNDS	61.26	LBS/HR	NSR Permit 105710
n-butane	500.00	POUNDS	61.26	LBS/HR	NSR Permit 105710
Isopentane	500.00	POUNDS	61.26	LBS/HR	NSR Permit 105710
n-pentane	500.00	POUNDS	61.26	LBS/HR	NSR Permit 105710
Hydrogen Sulfide	100.00	POUNDS	.01	LBS/HR	NSR Permit 105710
Sulfur dioxide	100.00	% OPACITY	.81	LBS/HR	NSR Permit 105710

Cause of Emission Event or Excess Opacity Event, or Reason for Scheduled Activity:

Experienced power dip on main supplied power line requiring plant restart.

Actions Taken, or Being Taken, to Minimize Emissions And/or Correct the Situation:

Wet/Dry Gas Flare 1, 2, and Marine Flares maintained and operated during the activity to ensure vented hydrocarbons properly combusted.

Basis Used to Determine Quantities and Any Additional Information Necessary to Evaluate the Event:

The emissions in this report are based on estimated calculations.

Person Making Notification:	Roger Bennett	Date/Time:	04/15/2022 09:37:58 AM
Notifier Phone:	361-9771381 ext:		
Incident Contact:	Roger Bennett		
Contact E-mail:	roger.bennett@cheniere.com		
Contact Phone:	361-9771381 ext:		
Notification Jurisdictions:	REGION 14 - CORPUS CHRISTI		
Affirmative Defense	The owner or operator of the regulated entity asserts this reported event or activity, as applicable, meets the applicable affirmative defense criteria. YES		
Publication Status:	VERIFIED		

I agree that data displayed in this report is the exact data or is acceptably equivalent to the data provided for the specified regulated entity, and the information is, to the best of my knowledge, true, accurate and complete. By entering my password and pressing the 'Confirm Submit' button, I agree that:

1. I am Roger M Bennett, the owner of the STEERS account ER054502.
2. I have the authority to submit this data on behalf facility located at RN104104716.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally submitting 1 incident record.

This document was signed by Roger M Bennett.

Signature Hash: E65364198EA9C08FAAC4740E81EBDC4FF80D67E3F9ED21B661D8297E40201034

The following is additional information contained in your Copy of Record:

Submission IP address: 165.225.216.193

Submission date and time: 04/15/2022 09:37:59 AM

Submission STEERS Version: 6.50

Submission Confirmation Number: 179454

Submission Data Hash Code: CCE559F67B3E74DA06DF180BCFBB7BB0000DFC71D3D8421340AE727DAD76C23

STEERS AEME Incident Id: 189578

Texas Commission on Environmental Quality

Reportable Activity Report

Submittal Type Incident # Incident Status Investigation # Investigation Status
 FINAL 377971 OPEN

Customer Name **CN #**
 CORPUS CHRISTI LIQUEFACTION LLC CN604136374

Name of Owner or Operator **RN/Air Acct #** **Physical Location**
 CORPUS CHRISTI LIQUEFACTION RN104104716 622 HWY 35
 GREGORY, TX 78359

Event/Activity Type **Date / Time Event Discovered or Scheduled Activity Start/End** **Duration**
 AIR STARTUP 4/15/2022 9:00:00AM 4/16/2022 4:00:00AM 19 hours 0 minutes

Emission Point Common Name		Emission Point Number (EPN)			
Marine Flare		MRNFLR			
List of Compound Descriptive type(s) of Individually Listed or Mixtures of Air Contaminant Compounds Released, Including opacity	Estimated Total Quantity for Air Contaminants for Emissions / Opacity Value for Opacity	Units	Authorized Emissions Limit / Opacity Limit	Units	Authorization (rule or permit #)
Carbon Monoxide	2,952.83	POUNDS	909.72	LBS/HR	NSR Permit 105710
Ethane	0.00	POUNDS	0.00		N/A
Hydrogen Sulfide	0.00	POUNDS	0.01	LBS/HR	NSR Permit 105710
Methane	2,440.61	POUNDS	666.00	TONS/YR	GHGPSDTX123
Oxides of Nitrogen (NOx)	344.39	POUNDS	106.23	LBS/HR	NSR Permit 105710
Propane	0.71	POUNDS	7.85	LBS/HR	NSR Permit 105710
Sulfur dioxide	0.00	POUNDS	0.01	LBS/HR	NSR Permit 105710
VOC (unclassified)	1.36	POUNDS	7.85	LBS/HR	NSR Permit 105710

Emission Point Common Name		Emission Point Number (EPN)			
Wet/Dry Gas Flare 1		WTDYFLR1			
List of Compound Descriptive type(s) of Individually Listed or Mixtures of Air Contaminant Compounds Released, Including opacity	Estimated Total Quantity for Air Contaminants for Emissions / Opacity Value for Opacity	Units	Authorized Emissions Limit / Opacity Limit	Units	Authorization (rule or permit #)
Carbon Monoxide	1,588.86	POUNDS	283.93	LBS/HR	NSR Permit 105710
Ethane	36.15	POUNDS	0.00		N/A
Ethylene	6.29	POUNDS	61.26	LBS/HR	NSR Permit 105710
Hydrogen Sulfide	0.00	POUNDS	0.01	LBS/HR	NSR Permit 105710
Isobutane	10.21	POUNDS	61.26	LBS/HR	NSR Permit 105710
Isopentane	0.48	POUNDS	61.26	LBS/HR	NSR Permit 105710
Methane	1,191.36	POUNDS	1,485.00	TONS/YR	GHGPSDTX123
n-butane	11.23	POUNDS	61.26	LBS/HR	NSR Permit 105710
n-pentane	0.27	POUNDS	61.26	LBS/HR	NSR Permit 105710
Oxides of Nitrogen (NOx)	210.36	POUNDS	71.29	LBS/HR	NSR Permit 105710
Propane	158.60	POUNDS	61.26	LBS/HR	NSR Permit 105710
Sulfur dioxide	0.11	% OPACITY	0.81	LBS/HR	NSR Permit 105710
VOC (unclassified)	0.00	POUNDS	61.26	LBS/HR	NSR Permit 105710

Emission Point Common Name		Emission Point Number (EPN)			
Wet/Dry-Flare 2		WTDYFLR2			

Texas Commission on Environmental Quality Reportable Activity Report

List of Compound Descriptive type(s) of Individually Listed or Mixtures of Air Contaminant Compounds Released, Including opacity	Estimated Total Quantity for Air Contaminants for Emissions / Opacity Value for Opacity	Units	Authorized Emissions Limit / Opacity Limit	Units	Authorization (rule or permit #)
Carbon Monoxide	6,221.93	POUNDS	283.93	LBS/HR	NSR Permit 105710
Ethane	157.83	POUNDS	0.00		NA
Ethylene	14.45	POUNDS	61.26	LBS/HR	NSR Permit 105710
Hydrogen Sulfide	0.00	POUNDS	0.01	LBS/HR	NSR Permit 105710
Isobutane	80.74	POUNDS	61.26	LBS/HR	NSR Permit 105710
Isopentane	22.52	POUNDS	61.26	LBS/HR	NSR Permit 105710
Methane	4,806.67	POUNDS	1,485.00	TONS/YR	GHGPSDTX123
n-butane	75.66	POUNDS	61.26	LBS/HR	NSR Permit 105710
n-pentane	10.24	POUNDS	61.26	LBS/HR	NSR Permit 105710
Oxides of Nitrogen (NOx)	767.76	POUNDS	71.29	LBS/HR	NSR Permit 105710
Propane	309.45	POUNDS	61.26	LBS/HR	NSR Permit 105710
Sulfur dioxide	0.01	POUNDS	0.81	LBS/HR	NSR Permit 105710
VOC (unclassified)	0.00	POUNDS	61.26	LBS/HR	NSR Permit 105710

Facility Common Name Marine Process	Facility Identification Number (FIN) PRCSSMRN
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Facility Common Name Process 1	Facility Identification Number (FIN) PRCSS1
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Facility Common Name Process 2	Facility Identification Number (FIN) PRCSS2
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Facility Common Name Process 3	Facility Identification Number (FIN) PRCFF3
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Process Unit or Area Common Name Marine Flare

Process Unit or Area Common Name Train 1
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Process Unit or Area Common Name Train 2
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Process Unit or Area Common Name Train 3
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Cause of Emissions Event, Excess Opacity Event, or Reason for Scheduled Activity:

CCL experienced a power interruption that led to an emergency shutdown of the facility per procedure. The interruption was a result of a commercial power transmission line trip outside the control of CCL due to faulty insulators on an external provider's power lines. This Final report is associated with the emissions from restart of the liquefaction trains that occurred safely per procedures after shutdown. Note: The initial shutdown did not exceed a reportable quantity of emissions.

Actions Taken, of Being Taken, to Minimize Emissions and/or Correct the Situation:

The emergency shutdown was manually initiated to maintain integrity of facility equipment. Cheniere utilized good engineering practices during startup activities. The Wet/Dry Gas 1, 2, and Marine flares were maintained and operated during startup activities to ensure vented hydrocarbons were properly combusted.

Texas Commission on Environmental Quality Reportable Activity Report

Basis Used to Determine Quantities and Any additional Information Necessary to Evaluate the Event:

The emissions in this final report are based on engineering calculations and TCEQ approved flare methodologies.

Person Making Initial Notification

Initial Notification Date/Time

Method

Incident Primary Contact

Jurisdiction(s) Notified

REGION 14 - CORPUS CHRISTI

Agency Comments

Assigned Staff Member: Cole Castleberry

Texas Commission on Environmental Quality Reportable Activity Report

Incident Count :	1			
Incident Duration Total :	19 hours. 0 minutes.			
Average Incident Duration:	19 hours. 0 minutes.			
Duration Percent of Annual Operating Hours (8760)				
Incident	Reg Ent Num	Reg Ent Name	Duration	Percent
377971	RN104104716	CORPUS CHRISTI LIQUEFACTION	19	0.22%



ATTACHMENT 2

CCL Response

Corpus Christi Liquefaction, LLC

Corpus Christi Liquefaction

RN104104716

San Patricio County

Investigation No. 1819375

June 7, 2022

Attachment Total Pages = 3

This document is in response to an email sent to Corpus Christi Liquefaction (CCL) by TCEQ Office of Compliance and Enforcement, Cynthia Gandee on 5-6-2022 at 5:23 pm.

This is to confirm and acknowledge the receipt of your final State of Texas Environmental Electronic Reporting System (STEERS) Report for the referenced incident and to request additional information that may not be included in your STEERS report. In order to complete the investigation of this incident, the following questions should be answered as completely as possible. The questions have been designed to elicit the information necessary to determine if the event was an excessive emissions event, or if it is subject to the affirmative defense. Please note that 30 TAC §101.221(e), states that “The owner or operator of a facility has the burden of proof to demonstrate that the applicable criteria identified in §101.222 (relating to Demonstrations) are satisfied.”

1. How many reportable and recordable emissions events/excess opacity event (EOE)/unplanned maintenance, startup, shutdown (MSS) (including this incident) have occurred at the facility/facilities contributing emissions during this incident for the 12-month period prior to this incident?

Cheniere Response:

Stage 1 Wet/Dry Flare (NSR#105710) - 0- Reportable, 3- Recordable, 0-EOE, 1-Unplanned MSS.

Stage 2 Wet/Dry Flare (NSR#105710) - 0- Reportable, 5- Recordable, 0-EOE, 1-Unplanned MSS.

Marine Flare (NSR#105710) - 0- Reportable, 0- Recordable, 0-EOE, 1-Unplanned MSS.

2. What were the facility/facilities total actual operating hours during the past 12 months?

Cheniere Response:

Stage 1 Wet/Dry Flare (NSR#105710) had 8760 total actual operating hours (past 12 months).

Stage 2 Wet/Dry Flare (NSR#105710) had 8760 total actual operating hours (past 12 months).

Marine Flare (NSR#105710) had 8760 total actual operating hours (past 12 months).

3. Identify the cause or causes of the emissions event (EE)/EOE and include all contributing factors that led to the emissions event. Discuss how the EE/EOE could not have been avoided by good design, maintenance, and operation practices, if applicable. Discuss any sudden breakdown of equipment or process that was beyond the owner/operator’s control, if applicable.

For unplanned MSS activity, skip question 3, and answer the following instead:

Explain how the periods of unauthorized emissions from the unplanned maintenance, startup, or shutdown activity could not have been prevented through better planning and design.

Cheniere Response: On April 15, 2022 at 0721 hrs the CCL facility had a power interruption that led to an emergency shutdown of the facility per procedure. The interruption was a result of a commercial power transmission line trip outside the control of CCL due to failed insulators on an external provider’s power lines. This final report is associated with the emissions from restart of the liquefaction trains that occurred safely per procedures after shutdown. This incident was unavoidable due to the duration of the power supply interruption by a commercial power provider.

What steps were taken to minimize the frequency and duration of operation in the unplanned maintenance, startup, or shutdown mode in order to minimize the impact of the unauthorized emissions on the ambient air quality?

Cheniere Response: Emergency ESDs were manually initiated per procedures in order to maintain integrity of all process equipment. Facility was brought up according to procedures.

Briefly explain why prior notice could not be given for this maintenance, startup, or shutdown activity. Skip this question if prior notification was submitted in accordance with 30 TAC §101.211.

Cheniere Response: The unplanned startup was submitted in adherence to 30 TAC §101.211 via STEERS report 377971 in less than 10 days' notice due to the emergency shutdown.

4. How were the air pollution control equipment or processes (if any) maintained and operated in a manner consistent with good practice for minimizing emissions/opacity?

Cheniere Response: Cheniere utilized good engineering practices during startup activities. The Wet/Dry Gas 1, 2, and Marine flares were maintained and operated during startup activities to ensure vented hydrocarbons were properly combusted.

5. How soon was action taken to achieve compliance once the operator knew or should have known that applicable emission/opacity limitations were being exceeded?

Cheniere Response: Action was taken as soon as it was safe to restart the equipment per procedure. Within 60 minutes of the power loss, the orderly restart of equipment was initiated in the appropriate sequence to bring the plant back online.

6. How were the amount and duration of the unauthorized emissions/opacity event and any bypass of pollution control equipment minimized?

Cheniere Response: Operations personnel sequentially restarted equipment per procedure to get facility operational and back online. There was no bypass of any pollution control equipment during this event. STEERS Inc # 377971 was submitted to authorize the initial startup activities of the entire facility (Trains 1-3). Unauthorized emissions were not caused by a bypass of control equipment. CCL startup procedures are designed to complete startup as quickly as safety allows.

For unplanned MSS activity, were the unauthorized emissions caused by a bypass of control equipment? If so, please describe how the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage.

Cheniere Response: No unauthorized emissions were caused by a bypass of control equipment.

7. What was the operational status of all emission monitoring systems at the facility/facilities during this EE/EOE/unplanned MSS activity? If any emission monitoring systems were not kept in operation during the EE/EOE/unplanned MSS activity, explain why they weren't kept in operation.

Cheniere Response: CCL does not utilize any emissions monitoring systems.

8. How were the owner and or operator's actions in response to the unauthorized emissions contemporaneously documented?

Cheniere Response: Facility shift handover logs are used to document detailed operational events. Process operations are tracked in an electronic PI Data archiving system and emissions

are tracked in spreadsheets utilizing engineering calculations and TCEQ approved flare methodologies.

9. Have other similar incidents occurred at this/these facility/facilities in the past that might be indicative of inadequate design, operation, or maintenance?

Cheniere Response: Similar incidents have occurred in the past but are not indicative of inadequate design, operation, or maintenance in the CCL facility. This was a facility and area wide supply power interruption as a result of a commercial power transmission line trip outside the control of CCL due to failed insulators on an external provider's power lines.

10. Identify any information you have (e.g., complaints from neighbors, fence line monitoring, air modeling) which indicates an off-site impact. Identify any information you have which indicates the unauthorized emissions caused or contributed to an exceedance of the national ambient air quality standard (NAAQS), a prevention of significant deterioration (PSD) increment, or to a condition of air pollution.

Cheniere Response: CCL is not aware of any complaints from neighbors during the startup of the facility due to the intermittent commercial power loss.

11. Do you have any additional information to support your claim of an affirmative defense? If yes, you must provide that information at this time to be considered. If you wish to withdraw the affirmative defense claim you made with your STEERS report, please specify that here.

Cheniere Response: CCL has a strong commitment to safety, health, and the environment and appreciates having this opportunity to respond to your information request. Please let us know if there are any further questions.

The request for this additional information is made according to 30 TAC §101.201(f). This rule states that the owner or operator of a regulated entity must provide, in writing, additional or more detailed information regarding the emissions event when requested by the executive director and that the information must be provided within the timeframe established in the request. The timeframe to provide this information is within 30 days from receipt of this email. Failure to provide a response within the established timeframe shall result in a notice of violation. All determinations relating to the emissions event shall be based on the final report and the additional information supplied in response to this request.



ATTACHMENT 3

EIF

Corpus Christi Liquefaction, LLC

Corpus Christi Liquefaction

RN104104716

San Patricio County

Investigation No. 1819375

June 7, 2022

Attachment Total Pages = 1

EXIT INTERVIEW FORM: Potential Violations and/or Records Requested

Regulated Entity/Site Name	Corpus Christi Liquefaction, LLC – Corpus Christi Liquefaction			TCEQ Add. ID No. RN No (optional)	RN104104716	
Investigation Type	UML31 H	Contact Made In-House (Y/N)	Y	Purpose of Investigation	Emissions Event Investigation No. 1819375 Incident No. 377971	
Regulated Entity Contact	Mr. Roger Bennett			Telephone No.	361-977-1383	Date Contacted 6/7/2022
Title	Sr. Environmental Coordinator			E-mail:	Roger.bennett@chenier e.com	Date Emailed: 6/7/2022

NOTICE: The information provided in this Note is intended to provide clarity to issues that have arisen to the date of this Note during the investigation process between the agency and the company and *does not represent agency findings related to violations*. Any potential or alleged violations discovered after the date of this Note will be communicated by telephone to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in this investigation's final report.

Issue		For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.				
No.	Type ¹	Rule Citation (if known)	Description of Issue			
1	O		An evaluation of incident 377971 has been conducted by the TCEQ Region 14 Office and at this time, based on the information reviewed, it appears the affirmative defense criteria has been met. A copy of the final investigation report will be provided upon request. Please submit your request to Mr. Cole Castleberry, 361-881-6900, cole.castleberry@TCEQ.Texas.gov.			

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes		
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes		
Document Acknowledgment. Signature on this document establishes only that the regulated entity (company) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, document will be faxed to regulated entity; therefore, signature not required.			
<i>Cole Castleberry</i>	6/7/2022		
Investigator Name	Date	Regulated Entity Representative Name (Signed & Printed)	Date

If you have questions about any information on this form, please contact your local TCEQ Regional Office.

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512/239-3282.