Corpus Christi LNG, LLC
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September 9, 2022

Kelly Ruble
Air Section Manager
TCEQ Region 14
500 North Shoreline Blvd, Ste 500
Corpus Christi, TX 78401-0318

RE: Corpus Christi Liquefaction, LLC
Notice of Compliance Status
NESHAP Subpart YYYY
Title V Air Operating Permit O3580
Facility ID No. 0900071

Dear Administrator,

The Corpus Christi Liquefaction, LLC (CCL) facility located in San Patricio County, Texas is an affected source under Title 40 Code of Federal Regulations (40 CFR), Part 63, Subpart YYYY. CCL owns and operates eighteen (18) 35 Megawatt (MW) GE PGT25+G4 DLE natural gas-fired turbines (EPN: TRB1 – TRB18). The intent of this letter is to satisfy the requirements of 40 CFR §63.6145(f). This notification is being submitted within 60 days of performance testing, which began July 12, 2022.

Notification of Compliance Status (NOCS) requires the following information per 40 CFR §63.9(h)(2)(i):

(A) The methods that were used to determine compliance;

EPA Promulgated Method 320 was used to measure formaldehyde and Method 3A was used to measure oxygen to ensure TRB1 – TRB18 compliance with the standard.

(B) The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

Advance notification of testing was submitted in a correspondence dated May 11, 2022. CCL conducted initial performance tests on all eighteen turbines beginning July 12, 2022, demonstrating compliance with the emission limitation for formaldehyde of 91 parts per billion (ppb) at 15% oxygen (O_2) for all turbines. Performance test results for all the turbines are summarized below and can be found in the submitted emissions testing reports.

Turbine ID	Formaldehyde at 15% O_2 (ppb)
TRB1	21.84
TRB2	18.53
TRB3	24.28
TRB4	42.31
TRB5	32.89
TRB6	18.73
TRB7	39.48
TRB8	72.61
TRB9	23.11
TRB10	49.13
TRB11	30.51
TRB12	54.12
TRB13	35.36
TRB14	29.08
TRB15	20.27
TRB16	31.64
TRB17	18.52
TRB18	49.58

(C) The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;

CCL does not utilize an oxidation catalyst to comply with the emission limitation for formaldehyde. In accordance with Table 5 of 40 CFR Part 63 Subpart YYYY and 40 CFR §63.6120(e), CCL prepared and submitted to TCEQ and EPA a petition that details methods for determining continuous compliance. CCL is still coordinating with TCEQ and EPA on that petition.

Current monitoring requirements include annual emissions testing for formaldehyde per 40 CFR §63.4115-4120. Reporting requirements include a semiannual deviation report via CEDRI per 40 CFR §63.6150. Annual testing of the turbines will utilize test methods used in the initial emissions tests, EPA Promulgated Methods 320 for formaldehyde and 3A for oxygen, per Table 3 of 40 CFR Part 63 Subpart YYYY.

(D) The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified in the relevant standard;

TRB1 – TRB18 emit Formaldehyde, a hazardous air pollutant, which is regulated by 40 CFR Part 63 Subpart YYYY. Results from the test are summarized above in section (B) in ppb adjusted to 15% O_2. Test data is measured and averaged over three separate 1-hour periods.

(E) If the relevant standard applies to both major and area sources, an analysis demonstrating whether the affected source is a major source (using the emissions data generated for this notification);

CCL is considered a major source of HAPs based on potential to emit (PTE).

(F) A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method);

TRB1 – TRB18 at CCL are equipped with DLE (Dry Low Emission) technology that is engaged when the turbines are online. DLE technology utilizes a lean premix combustion system design that ensures proper combustion in the turbines.

(G) A statement by the owner or operator of the affected existing, new, or reconstructed source as to whether the source has complied with the relevant standard or other requirements.

CCL has performed the initial performance tests, which demonstrate that all eighteen turbines at the facility complied with the 91ppb formaldehyde limit.

If you have any questions, please contact Craig Kondoff at (361) 977-1373 or via email at Craig.Kondoff@Cheniere.com.

I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Sincerely,

Ari Aziz
Vice President and General Manager

CC: Deputy Regional Administrator (via CEDRI)
Environmental Protection Agency
Region 6
1201 Elm Street, Ste 500
Dallas, TX 75270