Corpus Christi LNG, LLC
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June 15, 2022

Helena Wooden-Aguilar
Acting Deputy Regional Administrator
Environmental Protection Agency (EPA), Region 6
1201 Elm Street, Ste 500
Dallas, TX 75270
r6airpermitstx@epa.gov

RE: Corpus Christi Liquefaction, LLC
Operational Parameter Petition
NESHAP Subpart YYYY
Title V Air Operating Permit O3580

Dear Ms Wooden-Aguilar

Corpus Christi Liquefaction, LLC (CCL) owns and operates eighteen (18) 35 MegaWatt (MW) GE PGT25+G4 DLE natural-gas fired turbines. The 18 turbines are not equipped with an oxidation catalyst and therefore we must submit a monitoring petition, per 40 CFR §63.6120(e). CCL is requesting approval of no additional operational limitations as part of our petition. Based on available information CCL expects formaldehyde emissions from the 18 turbines to be below the 91ppb emission limit referenced in 40 CFR Part 63 Subpart YYYY Table 1. The DLE (Dry Low Emission) control, via staged lean premix combustion, on the turbine is engaged once the turbine is started up. This feature cannot be disengaged or deactivated once the turbine is started. The DLE's are maintained according to the manufacturer's recommendations to increase reliability and to perform with low emissions. CCL proposes using the current operation of DLE combustion technology as the operating parameter to demonstrate continuous compliance with the standard.

As per, 40 CFR §63.6120(g), a petition to the Administrator for approval of no additional operating limitations must include the information described in paragraphs (g)(1) through (7) of this section. Responses to each paragraph are provided below:

(g)(1) Identification of the parameters associated with operation of the stationary combustion turbine and any emission control device which could change intentionally (e.g., operator adjustment, automatic controller adjustment, etc.) or unintentionally (e.g., wear and tear, error, etc.) on a routine basis or over time;

> The amount of fuel flow has a direct effect on turbine firing rate. CCL will continuously monitor firing rate on the turbine as part of its performance test as well as during continuous turbine operation. No other parameters are indicative of low formaldehyde emissions. CCL will follow the manufacturer's recommended preventative maintenance plan on the turbines, however, normal wear and tear should not affect formaldehyde emissions.

(g)(2) A discussion of the relationship, if any, between changes in the parameters and changes in HAP emissions;

> Based on available information CCL believes that all turbines will be able to meet the 91 ppb formaldehyde standard at normal operating rates. Changes in fuel flow to the turbine, would not

be expected to change HAP emissions.

(g)(3) For the parameters which could change in such a way as to increase HAP emissions, a discussion of why establishing limitations on the parameters is not possible;

Based on available information CCL believes that all turbines will be able to meet the 91ppb formaldehyde standard at normal operating rates. There is no expected increase in HAP emissions.

(g)(4) For the parameters which could change in such a way as to increase HAP emissions, a discussion of why you could not establish upper and/or lower values for the parameters which would establish limits on the parameters as operating limitations;

Based on available information CCL believes that all turbines will be able to meet the 91ppb formaldehyde standard at normal operating rates. There is no expected increase in HAP emissions.

(g)(5) For the parameters which could change in such a way as to increase HAP emissions, a discussion identifying the methods you could use to measure them and the instruments you could use to monitor them, as well as the relative accuracy and precision of the methods and instruments;

Based on available information CCL believes that all turbines will be able to meet the 91 ppb formaldehyde standard at normal operating rates. There is no expected increase in HAP emissions. The turbine inlet fuel line is equipped with fuel flow meters and composition analyzers to continuously monitor fuel to the turbines. The meters and analyzers are maintained according to manufacturer specifications.

(g)(6) For the parameters, a discussion identifying the frequency and methods for recalibrating the instruments you could use to monitor them; and

The meters and analyzers in the fuel system are calibrated at least once a year, and an as needed basis.

(g)(7) A discussion of why, from your point of view, it is infeasible, unreasonable or unnecessary to adopt the parameters as operating limitations;

CCL owns and operates turbines with DLE controls. These emission controls cannot be disengaged once the turbine is operating. CCL will monitor firing rate during the initial performance test and currently monitors fuel flow to the turbines for emissions monitoring purposes. CCL petitions the Agency for approval of no additional operating limitations.,

CCL is scheduled to conduct the initial performance tests for formaldehyde beginning the week of July 11, 2022. Your approval is respectfully requested prior to this date to conduct emissions testing within the required timeline.

Sincerely,

Ari Aziz
Vice President and General Manager

CC: Kelly.Ruble@tceq.texas.gov
Kelly Ruble, Air Section Manager, TCEQ Region 14