

Texas Commission on Environmental Quality

Title V Existing

2878

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	FREEPORT LNG REGAS FACILITY AND LIQUEFACTION PLANT
Does the site have a physical address?	Yes
Physical Address	
Number and Street	1500 LAMAR ST
City	QUINTANA
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.926944
Longitude (W) (-###.#####)	95.3175
Primary SIC Code	4925
Secondary SIC Code	
Primary NAICS Code	221210
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN103196689
What is the name of the Regulated Entity (RE)?	FREEPORT LNG LIQUEFACTION PLANT
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	Corner of Lamar and Cortez Streets
City	QUINTANA
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.926944
Longitude (W) (-###.#####)	-95.3175
Facility NAICS Code	
What is the primary business of this entity?	LIQUIFIED NATURAL GAS LNG

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN601720345
Type of Customer	Partnership
Full legal name of the applicant:	
Legal Name	Freeport LNG Development, L.P.
Texas SOS Filing Number	800125153
Federal Tax ID	
State Franchise Tax ID	12700304111
State Sales Tax ID	

Local Tax ID	
DUNS Number	
Number of Employees	21-100
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	FREEPORT LNG DEVELOPMENT LP
Prefix	MR
First	MICHAEL
Middle	
Last	MOPPERT
Suffix	
Credentials	
Title	CHIEF OPERATING OFFICER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	1500 LAMAR ST
Routing (such as Mail Code, Dept., or Attn:)	
City	QUINTANA
State	TX
ZIP	77541
Phone (###-###-####)	7134158744
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	MMoppert@freeporlng.com

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

Organization Name	MICHAEL STEPHENSON(FREEPORT LNG DE...)
Prefix	FREEPORT LNG DEVELOPMENT LP
First	MR
Middle	MICHAEL
Last	STEPHENSON
Suffix	
Credentials	
Title	DIRECTOR OF REGULATORY AFFAIRS
Enter new address or copy one from list	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	1500 LAMAR ST

Routing (such as Mail Code, Dept., or Attn:)	
City	QUINTANA
State	TX
Zip	77541
Phone (###-###-####)	9794158728
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	mstephenson@freeportlng.com

Technical Contact

Person TCEQ should contact for questions about this application:	
Select existing TC contact or enter a new contact.	THONG MAN(FREEPORT LNG DE...)
Organization Name	FREEPORT LNG DEVELOPMENT LP
Prefix	MR
First	THONG
Middle	
Last	MAN
Suffix	PE
Credentials	
Title	REGULATORY COMPLIANCE ENGINEER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	1500 LAMAR ST
Routing (such as Mail Code, Dept., or Attn:)	
City	QUINTANA
State	TX
ZIP	77541
Phone (###-###-####)	9792304820
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	tman@freeportlng.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	28 Deg 55 Min 37 Sec
3) Permit Longitude Coordinate:	95 Deg 19 Min 3 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	2878-39287
5) Who will electronically sign this Title V application?	Duly Authorized Representative
6) Does this application include Acid Rain Program or Cross-State Air Pollution Rule	N/A

requirements?

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

Attach OP-2 (Application for Permit Revision/Renewal)

Attach OP-ACPS (Application Compliance Plan and Schedule)

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name

OP-CRO1 Form - LQF O2878 Project 39287.pdf

Hash

ECB38924328E69A424BD3F33270EAFB282A0F87E14B0B7A7C73E56B9863EF7FE

MIME-Type

application/pdf

An additional space to attach any other necessary information needed to complete the permit.

Certification

I certify that I am the Duly Authorized Representative for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

1. I am Michael W Stephenson, the owner of the STEERS account ER029146.
2. I have the authority to sign this data on behalf of the applicant named above.
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 state and/or 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 signing Title V Existing 2878.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Michael W Stephenson OWNER OPERATOR

Account Number:	ER029146
Signature IP Address:	163.116.129.119
Signature Date:	2026-02-09
Signature Hash:	D90074A386FF35E1EF533EEC55540921C926101CA23462BE3A2B4EA86E4E65BB
Form Hash Code at time of Signature:	2E20F39576D92EB6DBBB83E326FCB9314C480DD3DE22C503E2D9E07EC78BBCE4

Submission

Reference Number:	The application reference number is 890546
Submitted by:	The application was submitted by ER029146/Michael W Stephenson
Submitted Timestamp:	The application was submitted on 2026-02-09 at 09:41:26 CST
Submitted From:	The application was submitted from IP address 163.116.129.119
Confirmation Number:	The confirmation number is 741721
Steers Version:	The STEERS version is 6.94
Permit Number:	The permit number is 2878

Additional Information

Application Creator: This account was created by Ishita Mathur

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, renewal, and reopening permit application submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information	
RN: RN103196689	
CN: CN601720345	
Account No.: BL-A014-N	
Permit No.: O2878	
Project No.: 39287	
Area Name: Freeport LNG Regas Facility and Liquefaction Plant	
Company Name: Freeport LNG Development, L.P.	
II. Certification Type <i>(Please mark appropriate box)</i>	
<input type="checkbox"/> Responsible Official	<input checked="" type="checkbox"/> Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>	
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other: _____	

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, and renewal permit application submittals requiring certification must be accompanied by this form. Updates to acid rain or CSAPR (other than public notice verification materials) must be certified prior to authorization of public notice for the draft permit.

IV. Certification of Truth	
This certification does not extend to information which is designated by TCEQ as information for reference only.	
I, <u>Michael Stephenson</u> certify that I am the <u>DAR</u>	
<i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i>	
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>	
Time Period: From <u>11/04/2025</u> to <u>02/05/2026</u>	
<i>(Start Date)</i>	<i>(End Date)</i>
Specific Dates: _____	
<i>(Date 1)</i>	<i>(Date 2)</i>
<i>(Date 3)</i>	<i>(Date 4)</i>
<i>(Date 5)</i>	<i>(Date 6)</i>
Signature: 	Signature Date: <u>02/05/2026</u>
Title: <u>Director of Regulatory Affairs</u>	

From: Thong Man <TMan@FreeportLNG.com>
Sent: Thursday, February 5, 2026 2:23 PM
To: Kyle Murray
Cc: Michael Stephenson; Scott Brooks; Deborah Walden-Hersh; Sophia Gray
Subject: RE: [EXTERNAL]: WDP -- FOP O2878/Project 39287, Freeport LNG Development, L.P. - Freeport LNG Regas Facility and Liquefaction Plant
Attachments: OP-CRO1 Form - LQF O2878 Project 39287.pdf

Thanks, Kyle! We approved the WDP and also sent you the OP-CRO1 form to certify the changes. Also, there are two very small grammar changes on the first page that we like to update.

AUTHORIZING THE OPERATION OF
Freeport ~~Lng~~ LNG Regas Facility ~~And and~~ Liquefaction Plant
Natural Gas Distribution

Thank you,

Thong Man P.E.
Regulatory Compliance Engineer
LQF – 1500 Lamar Street, Quintana, Texas 77541
Office: 979-230-4820
Cell: 469-450-9073



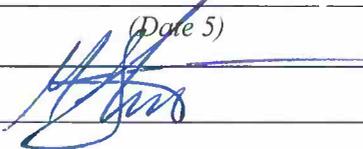
Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
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I. Identifying Information
RN: RN103196689
CN: CN601720345
Account No.: BL-A014-N
Permit No.: O2878
Project No.: 39287
Area Name: Freeport LNG Regas Facility and Liquefaction Plant
Company Name: Freeport LNG Development, L.P.
II. Certification Type <i>(Please mark appropriate box)</i>
<input type="checkbox"/> Responsible Official <input checked="" type="checkbox"/> Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
<input type="checkbox"/> SOP/TOP Initial Permit Application <input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application <input type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other: _____

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, and renewal permit application submittals requiring certification must be accompanied by this form. Updates to acid rain or CSAPR (other than public notice verification materials) must be certified prior to authorization of public notice for the draft permit.

IV. Certification of Truth	
This certification does not extend to information which is designated by TCEQ as information for reference only.	
I, <u>Michael Stephenson</u> certify that I am the <u>DAR</u>	
<i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i>	
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>	
Time Period: From <u>11/04/2025</u> to <u>02/05/2026</u>	
<i>(Start Date)</i>	<i>(End Date)</i>
Specific Dates: _____	
<i>(Date 1)</i>	<i>(Date 2)</i>
<i>(Date 3)</i>	<i>(Date 4)</i>
<i>(Date 5)</i>	<i>(Date 6)</i>
Signature: 	Signature Date: <u>02/05/2026</u>
Title: <u>Director of Regulatory Affairs</u>	

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>

Sent: Thursday, February 5, 2026 9:58 AM

To: Thong Man <TMan@FreeportLNG.com>

Cc: Michael Stephenson <MStephenson@freeportlng.com>; Scott Brooks <SBrooks@freeportlng.com>; Deborah Walden-Hersh <dwalden@trinityconsultants.com>; Sophia Gray <Sophia.Gray@trinityconsultants.com>

Subject: RE: [EXTERNAL]: WDP -- FOP O2878/Project 39287, Freeport LNG Development, L.P. - Freeport LNG Regas Facility and Liquefaction Plant

Good morning all,

I have incorporated the requested changes to remove several engines and compressors that are no longer in operation and attached the revised WDP for your review. Please provide me with any additional comments or indicate your approval by **Wednesday, February 11th**. As I discussed with Deborah over the phone, if you could review and approve the WDP by tomorrow, I will aim to have the public notice letter (PNAP) issued by next Friday, 02/13. Let me know if you have any questions. Thank you!

Sincerely,

Kyle J. Murray

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC 163, P.O. Box 13087

Austin, TX 78711-3087

kyle.murray@tceq.texas.gov

Phone: (512) 239-1279

Fax: (512) 239-1400



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Thong Man <TMan@FreeportLNG.com>
Sent: Wednesday, February 4, 2026 10:39 AM
To: Kyle Murray
Cc: Michael Stephenson; Scott Brooks; Deborah Walden-Hersh; Sophia Gray
Subject: RE: [EXTERNAL]: WDP -- FOP O2878/Project 39287, Freeport LNG Development, L.P. - Freeport LNG Regas Facility and Liquefaction Plant
Attachments: WDP - O2878 Freeport LNG (Significant 39287)_FLNG Comments (2026-0204).docx; LQF OP-2 (2026-0204).pdf; LQF OP-SUMR (2026-0204).pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning Kyle,

Thank you for sending a revised draft O2878 permit. When we reviewed the draft, we saw some edits and changes to heaters that were not requested in the original significant revision application. The heaters are no longer in use, have been removed from the NSR permit and are scheduled for demolition and removal (operational flexibility change documented in Project No. 38040). Rather than revert conditions back to a prior status for units no longer at the site, we would like to go ahead and incorporate the operational flexibility change now. The attached draft permit comments and form document the changes being requested at this time.

Thank you,

Thong Man P.E.
Regulatory Compliance Engineer
LQF – 1500 Lamar Street, Quintana, Texas 77541
Office: 979-230-4820
Cell: 469-450-9073



Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
GRP-ENGINE	SRIC ENGINES	EG-ADMIN, EG-DOCK	R7310-ENGINE	30 TAC Chapter 117, Subchapter B	No changing attributes.
GRP-ENGINE	SRIC ENGINES	EG-ADMIN, EG-DOCK	60III-ENGINE	40 CFR Part 60, Subpart IIII	No changing attributes.
GRP-ENGINE	SRIC ENGINES	EG-ADMIN, EG-DOCK	63ZZZZ-ENGINE	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
GRP-ETH	LOADING/UNLOADING OPERATIONS	17V-54A, 17V-54B	R115C-ETH	30 TAC Chapter 115, Loading and Unloading of VOC	No changing attributes.
GRP-HEATER	PROCESS HEATERS/FURNACES	B-1A, B-1B, B-1C, B-1D, B-1E, B-1F, B-1G, B-1H, B-1J	R7310-HEATERCEM	30 TAC Chapter 117, Subchapter B	No changing attributes.
GRP-HEATER	BOILERS/STEAM GENERATORS/STEAM GENERATING UNITS	B-1A, B-1B, B-1C, B-1D, B-1E, B-1F, B-1G, B-1H, B-1J	R7310-HEATERCEM	30 TAC Chapter 117, Subchapter B	No changing attributes.
GRP-HEATER	BOILERS/STEAM GENERATORS/STEAM GENERATING UNITS	B-1A, B-1B, B-1C, B-1D, B-1E, B-1F, B-1G, B-1H, B-1J	60DB-HEATER-CEM	40 CFR Part 60, Subpart Db	No changing attributes.
GRP-LIQEAC	SRIC ENGINES	LIQEAC-1, LIQEAC-2	R7310-ENGINE	30 TAC Chapter 117, Subchapter B	No changing attributes.
GRP-LIQEAC	SRIC ENGINES	LIQEAC-1, LIQEAC-2	60III-LIQEAC	40 CFR Part 60, Subpart IIII	No changing attributes.
GRP-LIQEAC	SRIC ENGINES	LIQEAC-1, LIQEAC-2	63ZZZZ-ENGINE	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
GRP-LIQENG	SRIC ENGINES	K-7A, K-7B, K-7C	R7310-LIQENG	30 TAC Chapter 117, Subchapter B	No changing attributes.
GRP-LIQENG	SRIC ENGINES	K-7A, K-7B, K-7C	60JJJJ-LIQENG	40 CFR Part 60, Subpart JJJJ	No changing attributes.

Commented [TM1]: These terminal heaters were removed from NSR Permit 55464. They should be removed from Title V permit O2878.

Commented [TM2]: These K-7 compressors were removed from NSR Permit 55464. They should be removed from Title V permit O2878.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
GRP-LIQENG	SRIC ENGINES	K-7A, K-7B, K-7C	63ZZZZ-ENGINE	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
GRP-LIQFLR	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	LIQFLAREMSS, LIQFLR-MCH, LIQFLR-PRO, LIQFLR-PSV, LIQFLR-TUR	115B-FLR	30 TAC Chapter 115, Vent Gas Controls	No changing attributes.
GRP-LIQFWP	SRIC ENGINES	LIQFWP-1, LIQFWP-2, LIQFWP-3	R7310-ENGINE	30 TAC Chapter 117, Subchapter B	No changing attributes.
GRP-LIQFWP	SRIC ENGINES	LIQFWP-1, LIQFWP-2, LIQFWP-3	60IIII-LIQFWP	40 CFR Part 60, Subpart IIII	No changing attributes.
GRP-LIQFWP	SRIC ENGINES	LIQFWP-1, LIQFWP-2, LIQFWP-3	63ZZZZ-ENGINE	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
GRP-LIQLEG	SRIC ENGINES	LIQEG-1, LIQEG-2, LIQEG-3, LIQEG-4, LIQEG-7	R7310-ENGINE	30 TAC Chapter 117, Subchapter B	No changing attributes.
GRP-LIQLEG	SRIC ENGINES	LIQEG-1, LIQEG-2, LIQEG-3, LIQEG-4, LIQEG-7	60IIII-LIQLEG	40 CFR Part 60, Subpart IIII	No changing attributes.
GRP-LIQLEG	SRIC ENGINES	LIQEG-1, LIQEG-2, LIQEG-3, LIQEG-4, LIQEG-7	63ZZZZ-ENGINE	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
GRP-LIQSEG	SRIC ENGINES	LIQEG-5, LIQEG-6	R7310-ENGINE	30 TAC Chapter 117, Subchapter B	No changing attributes.
GRP-LIQSEG	SRIC ENGINES	LIQEG-5, LIQEG-6	60IIII-LIQSEG	40 CFR Part 60, Subpart IIII	No changing attributes.
GRP-LIQSEG	SRIC ENGINES	LIQEG-5, LIQEG-6	63ZZZZ-LIQSEG	40 CFR Part 63, Subpart	No changing attributes.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						comply with a PM emission limit of 0.54 g/KW-hr, as listed in Table 1 to this subpart.			
EG-1	EU	63ZZZZ-ENGINE	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6590(c)	Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines as applicable. No further requirements apply for such engines under this part.	None	None	None
ETHCOMP	EP	115H-FLARE	Highly Reactive VOC	30 TAC Chapter 115, HRVOC Vent Gas	§ 115.727(f) §**See Alternative Requirement § 115.725(n)	All sites that are subject to this division and that are located in the Houston/Galveston/ Brazoria area as defined in §115.10 of this title (relating to Definitions), excluding Harris County, are exempt from § 115.722(b) and (c)(2) of this title, except as provided in § 115.729(a)(3) of this title (relating to Counties and Compliance Schedules).	§**See Alternative Requirement	§**See Alternative Requirement § 115.726(i) § 115.726(j)(1) § 115.726(j)(2)	§**See Alternative Requirement § 115.725(n)
FLR	EU	R1111-FLRBOG	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than	§ 111.111(a)(4)(A)(i) §	§ 111.111(a)(4)(A)(ii)	None

Commented [IM3]: We removed the citation symbol in front of the "See Alternative Requirement" lines

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines as applicable. No further requirements apply for such engines under this part.			
GRP-ETH	EU	R115C-ETH	VOC	30 TAC Chapter 115, Loading and Unloading of VOC	§ 115.217(a)(2)(A) § 115.212(a)(2) [G]§ 115.212(a)(7) § 115.214(a)(1)(B) § 115.214(a)(1)(D) § 115.214(a)(1)(D)(i)	Any plant, excluding gasoline bulk plants, which loads less than 20,000 gpd of VOC with a true vapor pressure of 0.5 psia or greater is exempt from the requirements of this division, except for the specified requirements.	§ 115.214(a)(1)(A) § 115.214(a)(1)(A)(i) § 115.215 § 115.215(4)	§ 115.216 § 115.216(2) § 115.216(3)(B) § 115.216(3)(D)	None
GRP-HEATER	EU	R7310-HEATERCEM	CO	30 TAC Chapter 117, Subchapter-B	§ 117.340(c)(1) § 117.340(c)(1)(B) § 117.340(c)(3)	CO emissions must not exceed 400 ppmv at 3.0% O₂, dry basis.	[G]§ 117.335(a)(1) § 117.335(a)(4) § 117.335(b) § 117.335(d) § 117.335(e) § 117.335(g) § 117.340(a) § 117.340(b)(1) § 117.340(b)(3) § 117.340(e) § 117.8000(b) § 117.8000(c) § 117.8000(c)(2) § 117.8000(c)(3) § 117.8000(c)(5)	§ 117.345(a) § 117.345(f) § 117.345(f)(1) § 117.345(f)(7) § 117.345(f)(9)	§ 117.335(b) § 117.335(g) [G]§ 117.345(b) [G]§ 117.345(e) § 117.345(d) § 117.345(d)(2) § 117.345(d)(3) § 117.345(d)(4) § 117.345(d)(5) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) [G]§ 117.8010(3)

Commented [TM4]: These terminal heaters were removed from the NSR Permit 55464. They should be removed from Title V Permit O2878.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
							<p>§ 117.8000(e)(6) [G]§ 117.8000(d) § 117.8120 § 117.8120(2) [G]§ 117.8120(2)(A) § 117.8120(2)(B) ** See Periodic Monitoring Summary</p>		<p>§ 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7) [G]§ 117.8010(8) § 117.8100(e)</p>
GRP-HEATER	EU	R7310-HEATERCEM	NO _x	30 TAC Chapter 117, Subchapter B	<p>§ 117.310(d)(3) § 117.310(a) § 117.310(a)(8)(A)(i) § 117.310(b) [G]§ 117.310(e)(1) § 117.310(e)(2) [G]§ 117.310(e)(3) § 117.310(e)(4) § 117.340(f)(1) § 117.340(f)(2) § 117.340(p)(1) § 117.340(p)(3)</p>	<p>An owner or operator may not use the alternative methods specified in §§ 117.315, 117.323 and 117.9800 to comply with the NO_x emission specifications but shall use the mass emissions cap and trade program in Chapter 101, Subchapter H, Division 3, except that electric generating facilities must also comply with the daily and 30-day system cap emission limitations of § 117.320. An owner or operator may use the alternative methods specified in § 117.9800 to comply with § 117.320.</p>	<p>[G]§ 117.335(a)(1) § 117.335(a)(4) § 117.335(b) § 117.335(c) § 117.335(d) § 117.335(f) § 117.335(f)(1) § 117.335(g) § 117.340(a) § 117.340(b)(1) § 117.340(b)(3) § 117.340(c)(1) [G]§ 117.340(c)(3) [G]§ 117.340(f)(2) § 117.340(f)(2) § 117.340(f)(2) § 117.340(o)(1) § 117.340(p)(1) § 117.8100(a) § 117.8100(a)(1) § 117.8100(a)(1)(A) § 117.8100(a)(1)(B) § 117.8100(a)(1)(B)(i) § 117.8100(a)(1)(B)(ii) § 117.8100(a)(1)(B)(iii) § 117.8100(a)(1)(C) § 117.8100(a)(2) [G]§ 117.8100(a)(3) § 117.8100(a)(4)</p>	<p>§ 117.345(a) § 117.345(f) § 117.345(f)(1) [G]§ 117.345(f)(2) § 117.345(f)(8) § 117.345(f)(9) § 117.8100(a)(5)(C)</p>	<p>§ 117.335(b) § 117.335(g) [G]§ 117.345(b) [G]§ 117.345(e) § 117.345(d) § 117.345(d)(3) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) § 117.8010(2)(C) § 117.8010(2)(D) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7) [G]§ 117.8010(8) § 117.8100(e)</p>

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
							§ 117.8100(a)(5) § 117.8100(a)(5)(A) § 117.8100(a)(5)(B) [G]§ 117.8100(a)(5)(D) [G]§ 117.8100(a)(5)(E) § 117.8100(a)(6)		
GRP-HEATER	EU	60DB-HEATER-CEM	PM (Opacity)	40-CFR Part 60, Subpart Db	§ 60.40b(a)	This subpart applies to each steam-generating unit constructed, modified, or reconstructed after 6/19/84, and that has a heat input capacity from fuels combusted in the unit > 20 MW (100 MMBtu/hr).	None	[G]§ 60.49b(d) § 60.49b(e)	§ 60.49b(a) § 60.49b(a)(1) § 60.49b(a)(3)
GRP-HEATER	EU	60DB-HEATER-CEM	SO ₂	40-CFR Part 60, Subpart Db	§ 60.42b(k)(2)	Units firing only very-low sulfur oil and/or a mixture of gaseous fuels with a potential SO ₂ emission rate of 140 ng/J (0.32 lb/MMBtu) heat input or less are exempt from the SO ₂ emissions limit in §60.42b(k)(1).	§ 60.47b(f)	§ 60.45b(k) § 60.49b(e) § 60.49b(f) § 60.49b(f)(1)	§ 60.49b(a) § 60.49b(a)(1) § 60.49b(f) § 60.49b(f)(1)
GRP-LIQEAC	EU	R7310-ENGINE	Exempt	30 TAC Chapter 117, Subchapter B	[G]§ 117.303(a)(11) [G]§ 117.310(f)	Units exempted from the provisions of this division except as specified in §§117.310(f), 117.340(j), 117.345(f)(6) and (10), 117.350(c)(1) and 117.354(a)(5) include new, modified, reconstructed, or relocated stationary diesel engine placed into service on or after October 1, 2001, that operates less than 100 hours per year, based on a	None	§ 117.340(j) § 117.345(f) [G]§ 117.345(f)(10) [G]§ 117.345(f)(6)	None

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
LIQEAC		LIQEAC		Subpart IIII	§ 1039-Appendix I § 60.4202(a)(2) § 60.4206 § 60.4207(b) [G]§ 60.4211(a) § 60.4211(c) [G]§ 60.4211(f)	emergency stationary CI ICE, that are not fire pump engines, with a maximum engine power greater than or equal to 130 KW and less than or equal to 2237 KW and a displacement of less than 10 liters per cylinder and is a 2007 model year and later must comply with a PM emission limit of 0.20 g/KW-hr, as stated in 40 CFR 60.4202(a)(2) and 40 CFR 1039-Appendix I.			
GRP-LIQEAC	EU	63ZZZZ-ENGINE	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6590(c)	Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines as applicable. No further requirements apply for such engines under this part.	None	None	None
GRP-LIQENG	EU	R7310-LIQENG	CO	30 TAC Chapter 117, Subchapter B	§ 117.310(c)(1) § 117.310(c)(1)(B)	CO emissions must not exceed 3.0 g/hp-hr for stationary internal combustion engines.	[G]§ 117.335(a)(1) § 117.335(a)(4) § 117.335(b) § 117.335(d) § 117.335(e) § 117.335(g) § 117.340(a)(2)(D)	§ 117.345(a) § 117.345(f) § 117.345(f)(12) § 117.345(f)(3) § 117.345(f)(3)(A) § 117.345(f)(3)(A)(iii) § 117.345(f)(9)	§ 117.335(b) § 117.335(g) [G]§ 117.345(b) [G]§ 117.345(e) [G]§ 117.345(e) § 117.8010 [G]§ 117.8010(1)

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Commented [DW5]: These K-7 compressors were removed from NSR Permit 55464. They should be removed from Title V permit O2878.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
							§ 117.340(h) § 117.8000(b) § 117.8000(e) § 117.8000(e)(2) § 117.8000(e)(3) § 117.8000(e)(5) § 117.8000(e)(6) [C]§ 117.8000(d) § 117.8140(a) § 117.8140(a)(1) § 117.8140(a)(2) § 117.8140(a)(2)(A) [C]§ 117.8140(a)(2)(B) § 117.8140(b)		§ 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) [C]§ 117.8010(3) § 117.8010(4) [C]§ 117.8010(5) § 117.8010(6) [C]§ 117.8010(7)
GRP-LIQENG	EU	60JJJJ-LIQENG	CO	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(2) § 60.4243(b)(2)(iii) § 60.4243(e) § 60.4243(g)	Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a CO emission limit of 4.0 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4244(a) § 60.4244(b) § 60.4244(c) § 60.4244(e)	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4245(a) § 60.4245(a)(2) § 60.4245(a)(4)	[G]§ 60.4245(e) § 60.4245(d)
GRP-LIQENG	EU	60JJJJ-LIQENG	NO _x	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(2) § 60.4243(b)(2)(iii) § 60.4243(e) § 60.4243(g)	Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a NO _x emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4244(a) § 60.4244(b) § 60.4244(c) § 60.4244(d)	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4245(a) § 60.4245(a)(2) § 60.4245(a)(4)	[G]§ 60.4245(e) § 60.4245(d)
GRP-	EU	60JJJJ-	VOG	40 CFR Part 60,	§ 60.4233(e)-Table	Owners and operators of	§ 60.4243(b)(2)	§ 60.4243(b)(2)	[G]§ 60.4245(e)

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Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
LIQENG		LIQENG		Subpart JJJJ	<p>‡</p> <p>§ 60.4234</p> <p>§ 60.4243(b)</p> <p>§ 60.4243(b)(2)</p> <p>§ 60.4243(b)(2)(ii)</p> <p>§ 60.4243(e)</p> <p>§ 60.4243(g)</p>	stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a VOC emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.	<p>§ 60.4243(b)(2)(ii)</p> <p>§ 60.4243(e)</p> <p>§ 60.4244(a)</p> <p>§ 60.4244(b)</p> <p>§ 60.4244(c)</p> <p>§ 60.4244(f)</p> <p>§ 60.4244(g)</p>	<p>§ 60.4243(b)(2)(ii)</p> <p>§ 60.4243(e)</p> <p>§ 60.4245(a)</p> <p>§ 60.4245(a)(1)</p> <p>§ 60.4245(a)(2)</p> <p>§ 60.4245(a)(4)</p>	§ 60.4245(d)
GRP-LIQENG	EU	63ZZZZ-ENGINE	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6590(c)	Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines as applicable. No further requirements apply for such engines under this part.	None	None	None
GRP-LIQFLR	EP	115B-FLR	VOC	30 TAC Chapter 115, Vent Gas Controls	<p>§ 115.123(a)(1)</p> <p>§ **See Alternative Requirement</p> <p>§ 115.910</p>	Alternate methods of demonstrating and documenting continuous compliance with the applicable control requirements or exemption criteria in this division may be approved by the Executive Director in accordance with §115.910	<p>§ **See Alternative Requirement [G]§ 115.125</p> <p>§ 115.126(2)</p> <p>** See Periodic Monitoring Summary</p>	<p>§ **See Alternative Requirement</p> <p>§ 115.126</p> <p>§ 115.126(2)</p>	§ **See Alternative Requirement

Additional Monitoring Requirements

Periodic Monitoring Summary 47

Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: GRP-HEATER	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 117, Subchapter B	SOP Index No.: R7310-HEATERCEM
Pollutant: CO	Main Standard: § 117.310(e)(1)
Monitoring Information	
Indicator: CO Concentration	
Minimum Frequency: Once per year	
Averaging Period: 1 hour	
Deviation Limit: Maximum CO Concentration – 400 ppmv at 3.0% O ₂ , dry basis	
Periodic Monitoring Text: Measure and record the carbon monoxide concentration using a portable analyzer or 40 CFR Part 60, Appendix A method test apparatus. The portable CO analyzer or other monitoring instrumentation shall be maintained, calibrated, and operated in accordance with the manufacturer's specifications or other written procedures. Any monitoring data above the maximum limit shall be considered and reported as a deviation.	

Commented [TM6]: The terminal heaters were removed from the NSR Permit 55464. They should be removed from the Title V Permit O2878.

Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit / Group / Process ID No.	Group / Inclusive Units	Regulation	Basis of Determination
GRP-HEATER	B-1A, B-1B, B-1C, B-1D, B-1E, B-1F, B-1G, B-1H, B-1J	30 TAC Chapter 112, Sulfur Compounds	Heaters do not use solid fossil fuel or liquid fuel.
GRP-LNGTK	18T-3, T-1, T-2	40 CFR Part 60, Subpart Kb	The maximum true vapor pressure of the stored volatile organic liquid (VOL) is less than 3.5 kPa.
GRP-MARINE	P1-DOCK, P2-DOCK	40 CFR Part 63, Subpart Y	The loading operations are at loading berths that only transfer liquids containing organic HAP as impurities.
GRP-PRO	17V-53A, 17V-53B	40 CFR Part 60, Subpart Kb	The storage tank has a storage capacity of less than 75 cubic meters (19,813 gallons).
GRP-STRMCEP	17U-50, 17U-61, 17U-62, 17U-63, 18U-50, STC-2400, STC-T-1, STC-T-2, STC-T-3, STC-T-4	30 TAC Chapter 115, Water Separation	The water separators are fully covered and designed solely to capture stormwater, spills or exterior surface cleanup waters.
GRP-STRMCEP	17U-50, 17U-61, 17U-62, 17U-63, 18U-50, STC-2400, STC-T-1, STC-T-2, STC-T-3, STC-T-4	40 CFR Part 63, Subpart VV	The emissions from the water separators are not subject to another subpart of 40 CFR parts 60, 61, or 63 that references the use of MACT VV.
LIQFLARE	N/A	40 CFR Part 60, Subpart A	The flare is not a control device used to comply with applicable subparts of parts 60 and 61.
LIQFLARE	N/A	40 CFR Part 63, Subpart A	The flare is not a control device used to comply with applicable subparts of part 63.

Commented [TM7]: These terminal heaters were removed from NSR Permit 55464. They should be removed from Title V Permit O2878.

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
17V-54A	UNLOADING INTO ETHYLENE PRESSURIZED STORAGE TANK	100114, N304
17V-54B	ETHYLENE TANK B	106.476/09/04/2000
17V-54B	UNLOADING INTO ETHYLENE PRESSURIZED STORAGE TANK	100114, N304
18T-3	LNG STORAGE TANK 3	106.476/09/04/2000
18U-50	STORM DRAIN UNIT	106.532/09/04/2000
B-1A	HEATER B-1A	55464
B-1B	HEATER B-1B	55464
B-1C	HEATER B-1C	55464
B-1D	HEATER B-1D	55464
B-1E	HEATER B-1E	55464
B-1F	HEATER B-1F	55464
B-1G	HEATER B-1G	55464
B-1H	HEATER B-1H	55464
B-1J	HEATER B-1J	55464
CUBE-DIES	UNLOADING INTO DIESEL CUBE TANK	106.412/09/04/2000
CUBE-GAS	UNLOADING INTO GASOLINE CUBE TANK	106.412/09/04/2000
EG-1	EMERGENCY GENERATOR EG-1	55464
EG-1TK	EMERGENCY GENERATOR EG-1 DIESEL DAY TANK	55464
EG-ADMIN	EMERGENCY GENERATOR EG-ADMIN	55464
EG-ADMINTK	EMERG GENERATOR EG-ADMIN DIESEL DAY TANK	55464
EG-DOCK	EMERGENCY GENERATOR EG-DOCK	55464

Commented [TM8]: These terminal heaters were removed from NSR Permit 55464. They should be removed from Title V Permit O2878.

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
EG-DOCKTK	EMERG GENERATOR EG-DOCK DIESEL DAY TANK	55464
ETHCOMP	DEPRESSURIZE MR COMPRESSOR ETHYLENE	100114, N304
FLR	FLARE	55464
FUG	FUGITIVES	55464
FUG-BOGLIQ	BOG LIQUEFACTION SYSTEM FUGITIVES	55464
FUG-LIQ123	FUGITIVES - TRAIN 1-TRAIN 3	100114, N304
FUG-LIQ4	FUGITIVES - TRAIN 4	100114, N304
FUG-PHII	PHASE II FUGITIVES	55464
FWP2	DIESEL-FUELED FIRE WATER PUMP	106.511/09/04/2000
FWPTK	FIRE WATER PUMP DIESEL DAY TANK	55464
JAM-DIES	UNLOADING INTO JAM DIESEL TANK	106.412/09/04/2000
K-7A	COMPRESSOR K-7A	55464
K-7B	COMPRESSOR K-7B	55464
K-7C	COMPRESSOR K-7C	55464
LEACT-1	BACKUP AIR COMPRESSOR TANK 1 UNLOADING	100114, N304
LEACT-2	BACKUP AIR COMPRESSOR TANK 2 UNLOADING	100114, N304
LEGT-1	EMERGENCY GENERATOR TANK 1 UNLOADING	100114, N304
LEGT-2	EMERGENCY GENERATOR TANK 2 UNLOADING	100114, N304
LEGT-3	EMERGENCY GENERATOR TANK 3 UNLOADING	100114, N304
LEGT-4	EMERGENCY GENERATOR TANK 4 UNLOADING	100114, N304
LEGT-5	EMERGENCY GENERATOR TANK 5 UNLOADING	100114, N304

Commented [TM9]: These K-7 compressors were removed from NSR Permit 55464. They should be removed from Title V Permit O2878.

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

[Table 1](#)

Date	Permit No.	Regulated Entity No.
02/04/2026	O2878	RN103196689

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	11K-30	OP-UA15	PROPANE COMPRESSORS LUBE OIL VENTS		100114	N304
	1	11K-31	OP-UA15	LP MR COMPRESSORS LUBE OIL VENTS		100114	N304
	1	11K-32/11K-33	OP-UA15	MP/HP MR COMPRESSORS LUBE OIL VENTS		100114	N304
	1	12K-30	OP-UA15	PROPANE COMPRESSORS LUBE OIL VENTS		100114	N304
	1	12K-31	OP-UA15	LP MR COMPRESSORS LUBE OIL VENTS		100114	N304
	1	12K-32/12K-33	OP-UA15	MP/HP MR COMPRESSORS LUBE OIL VENTS		100114	N304
	1	13K-30	OP-UA15	PROPANE COMPRESSORS LUBE OIL VENTS		100114	N304
	1	13K-31	OP-UA15	LP MR COMPRESSORS LUBE OIL VENTS		100114	N304

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	1	13K-32/13K-33	OP-UA15	MP/HP MR COMPRESSORS LUBE OIL VENTS		100114	N304
	1	14K-30	OP-UA15	PROPANE COMPRESSORS LUBE OIL VENTS		100114	N304
	1	14K-31	OP-UA15	LP MR COMPRESSORS LUBE OIL VENTS		100114	N304
	1	14K-32/14K-33	OP-UA15	MP/HP MR COMPRESSORS LUBE OIL VENTS		100114	N304
	1	17V-53A	OP-UA4	UNLOADING INTO PROPANE PRESSURIZED STORAGE TANK		100114	N304
	1	17V-53B	OP-UA4	UNLOADING INTO PROPANE PRESSURIZED STORAGE TANK		100114	N304
	1	17V-54A	OP-UA4	UNLOADING INTO ETHYLENE PRESSURIZED STORAGE TANK		100114	N304
	1	17V-54B	OP-UA4	UNLOADING INTO ETHYLENE PRESSURIZED STORAGE TANK		100114	N304

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	1	ETHCOMP	OP-UA15	DEPRESSURIZE MR COMPRESSOR ETHYLENE		100114	N304
	1	FUG-LIQ123	OP-UA12	FUGITIVES - TRAIN 1-TRAIN 3		100114	N304
	1	FUG-LIQ4	OP-UA12	FUGITIVES - TRAIN 4		100114	N304
	1	LEACT-1	OP-UA4	BACKUP AIR COMPRESSOR TANK 1 UNLOADING		100114	N304
	1	LEACT-2	OP-UA4	BACKUP AIR COMPRESSOR TANK 2 UNLOADING		100114	N304
	1	LEGT-1	OP-UA4	EMERGENCY GENERATOR TANK 1 UNLOADING		100114	N304
	1	LEGT-2	OP-UA4	EMERGENCY GENERATOR TANK 2 UNLOADING		100114	N304
	1	LEGT-3	OP-UA4	EMERGENCY GENERATOR TANK 3 UNLOADING		100114	N304

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	1	LEGT-4	OP-UA4	EMERGENCY GENERATOR TANK 4 UNLOADING		100114	N304
	1	LEGT-5	OP-UA4	EMERGENCY GENERATOR TANK 5 UNLOADING		100114	N304
	1	LEGT-6	OP-UA4	EMERGENCY GENERATOR TANK 6 UNLOADING		100114	N304
	1	LEGT-7	OP-UA4	EMERGENCY GENERATOR TANK 7 - TRAIN 4 UNLOADING		100114	N304
	1	LFWPT-1	OP-UA4	DIESEL FIREWATER TANK 1 UNLOADING		100114	N304
	1	LFWPT-2	OP-UA4	DIESEL FIREWATER TANK 2 UNLOADING		100114	N304
	1	LFWPT-3	OP-UA4	DIESEL FIREWATER TANK 3 UNLOADING		100114	N304

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Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	LIQEAC-1	OP-UA2	EMERGENCY AIR COMPRESSOR		100114	N304
	1	LIQEAC-2	OP-UA2	TRAIN 4 - EMERGENCY AIR COMPRESSOR		100114	N304
	1	LIQEG-1	OP-UA2	EMERGENCY GENERATOR 1		100114	N304
	1	LIQEG-2	OP-UA2	EMERGENCY GENERATOR 2		100114	N304
	1	LIQEG-3	OP-UA2	EMERGENCY GENERATOR 3		100114	N304
	1	LIQEG-4	OP-UA2	EMERGENCY GENERATOR 4		100114	N304
	1	LIQEG-5	OP-UA2	EMERGENCY GENERATOR - GUARD HOUSE/ADMIN AREA		100114	N304
	1	LIQEG-6	OP-UA2	EMERGENCY GENERATOR - DOCK 2		100114	N304
	1	LIQEG-7	OP-UA2	TRAIN 4 - EMERGENCY GENERATOR 4		100114	N304

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

[Table 1](#)

Date	Permit No.	Regulated Entity No.
02/04/2026	O2878	RN103196689

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	LIQFLARE	OP-UA7, OP-UA15	LIQUEFACTION FLARE		100114	N304
	1	LIQFLAREMSS	OP-UA15	MAINTENANCE, STARTUP, SHUTDOWN (MSS) VENTING TO FL		100114	N304
	1	LIQFLR-MCH	OP-UA15	FINAL COOLING MCHE		100114	N304
	1	LIQFLR-PRO	OP-UA15	DEPRESSURIZE MR COMPRESSOR PROPANE		100114	N304
	1	LIQFLR-PSV	OP-UA15	PSV VENTS AND PUMP SEALS TO FLARE		100114	N304
	1	LIQFLR-TUR	OP-UA15	TURNDOWN LNG PRODUCTION		100114	N304
	1	LIQFWP-1	OP-UA2	FIRE WATER PUMP 1		100114	N304
	1	LIQFWP-2	OP-UA2	FIRE WATER PUMP 2		100114	N304

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

[Table 1](#)

Date	Permit No.	Regulated Entity No.
02/04/2026	O2878	RN103196689

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	LIQFWP-3	OP-UA2	FIRE WATER PUMP 3		100114	N304
	1	P1-DOCK	OP-UA4	PHASE I LNG VESSEL LOADING/UNLOADING DOCK		55464, 100114	N304
	1	P2-DOCK	OP-UA4	PHASE II LNG VESSEL LOADING/UNLOADING DOCK		55464, 100114	N304
D	2	K-7A	OP-UA2	COMPRESSOR		55464	
D	2	K-7B	OP-UA2	COMPRESSOR		55464	
D	2	K-7C	OP-UA2	COMPRESSOR		55464	
D	2	B-1A	OP-UA5, OP-UA6	HEATER B-1A		55464	
D	2	B-1B	OP-UA5, OP-UA6	HEATER B-1B		55464	

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

[Table 1](#)

Date	Permit No.	Regulated Entity No.
02/04/2026	O2878	RN103196689

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
D	2	B-1C	OP-UA5, OP-UA6	HEATER B-1C		55464	
D	2	B-1D	OP-UA5, OP-UA6	HEATER B-1D		55464	
D	2	B-1E	OP-UA5, OP-UA6	HEATER B-1E		55464	
D	2	B-1F	OP-UA5, OP-UA6	HEATER B-1F		55464	
D	2	B-1G	OP-UA5, OP-UA6	HEATER B-1G		55464	
D	2	B-1H	OP-UA5, OP-UA6	HEATER B-1H		55464	
D	2	B-1J	OP-UA5, OP-UA6	HEATER B-1J		55464	

**Federal Operating Permit Program
 Application for Permit Revision/Renewal
 Form OP-2-Table 1
 Texas Commission on Environmental Quality**

Date: 02/04/2026	
Permit No.: O2878	
Regulated Entity No.: RN103196689	
Company Name: Freeport LNG Development, L.P.	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
I. Application Type	
Indicate the type of application:	
<input type="checkbox"/> Renewal	
<input type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input checked="" type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
For GOP Revisions Only	<input type="checkbox"/> YES <input type="checkbox"/> NO

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1 (continued)
Texas Commission on Environmental Quality**

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)

Indicate all pollutants for which the site is a major source based on the site's potential to emit:
(Check the appropriate box[es].)

VOC NO_x SO₂ PM₁₀ CO Pb HAP

Other:

IV. Reference Only Requirements (For reference only)

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? YES NO N/A

V. Delinquent Fees and Penalties

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: 02/04/2026
Permit No.: O2878
Regulated Entity No.: RN103196689
Company Name: Freeport LNG Development, L.P.

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
1	SIG-E	NO		OP-REQ1	100114	Updating NSR Permit No. 100114 and EPA Permit N304 issuance date.
2	MS-C	NO	K-7A, K-7B, K-7C, B-1A, B-1B, B-1C, B-1D, B-1E, B-1F, B-1G, B-1H, B-1J	OP-SUMR	55464	Incorporating operational flexibility change documented in Project No. 38040 for removal of Unit IDs K-7A, K-7B, K-7C, B-1A, B-1B, B-1C, B-1D, B-1E, B-1F, B-1G, B-1H, B-1J.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 3
Texas Commission on Environmental Quality**

Date: 02/04/2026	
Permit No.: O2878	
Regulated Entity No.: RN103196689	
Company Name: Freeport LNG Development, L.P.	
I. Significant Revision <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>	
A. Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B. Indicate the alternate language(s) in which public notice is required: Spanish	
C. Will, there be a change in air pollutant emissions as a result of the significant revision?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

**Federal Operating Permit Program
 Application for Permit Revision/Renewal
 Form OP-2-Table 3
 Texas Commission on Environmental Quality**

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

Pollutant	Description of the Change in Pollutant Emissions
Volatile organic compounds	Increase in pollutant emissions as a result of the significant revision.
Nitrogen oxides	Increase in pollutant emissions as a result of the significant revision.
Sulfur dioxide	Increase in pollutant emissions as a result of the significant revision.
Carbon monoxide	Increase in pollutant emissions as a result of the significant revision.

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>

Sent: Wednesday, January 28, 2026 3:29 PM

To: Thong Man <TMan@FreeportLNG.com>

Cc: Michael Stephenson <MStephenson@freeportlng.com>; Scott Brooks <SBrooks@freeportlng.com>; Deborah Walden-Hersh <dwalden@trinityconsultants.com>; Sophia Gray <Sophia.Gray@trinityconsultants.com>

Subject: RE: [EXTERNAL]: WDP -- FOP O2878/Project 39287, Freeport LNG Development, L.P. - Freeport LNG Regas Facility and Liquefaction Plant

Good afternoon all,

Attached is the revised WDP for your application. I have included all revisions referenced in your response and WDP comments. Please review and get back to me with any additional comments by **Wednesday February 4th, or sooner if possible**. If you have no further comments, please indicate your approval of the WDP and we will move towards the next stage of the application process. I will also ask you to certify all application updates upon your approval of the WDP. Let me know if you have any questions. Thank you!

Sincerely,

Kyle J. Murray

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC 163, P.O. Box 13087

Austin, TX 78711-3087

kyle.murray@tceq.texas.gov

Phone: (512) 239-1279

Fax: (512) 239-1400



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Thong Man <TMan@FreeportLNG.com>
Sent: Tuesday, January 20, 2026 1:38 PM
To: Kyle Murray
Cc: Michael Stephenson; Scott Brooks; Deborah Walden-Hersh; Sophia Gray
Subject: RE: [EXTERNAL]: WDP -- FOP O2878/Project 39287, Freeport LNG Development, L.P. - Freeport LNG Regas Facility and Liquefaction Plant Final LQF TV Response Ltr (2026-0120).pdf

Attachments:

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon Kyle,

Please see attached the Freeport LNG TV Significant Revision Information Request Response for the Liquefaction Plant and Regas Facility, including all applicable revised forms. Please let us know when you may have the revised draft permit for our review and if there is any additional information that you need.

Thank you,

Thong Man P.E.
Regulatory Compliance Engineer
LQF – 1500 Lamar Street, Quintana, Texas 77541
Office: 979-230-4820
Cell: 469-450-9073





January 20, 2026

Mr. Kyle Murray
Texas Commission on Environmental Quality
Air Permits Division, MC 163
P.O. Box 13087
Austin, Texas 78711-3087

*Subject: Freeport LNG TV Significant Revision Information Request Response
Permit Number: FOP O2878; TCEQ Project No. 39287
Freeport LNG Regas Facility and Liquefaction Plant
Quintana, Brazoria County
Regulated Entity Number: RN103196689
Customer Reference Number: CN601720345*

Dear Mr. Murray:

Freeport LNG Development, L.P. (Freeport LNG) owns and operates a Liquefied Natural Gas (LNG) Liquefaction Plant and regasification terminal (Regas Terminal), located on Quintana Island near Freeport, Texas. Freeport LNG has been assigned Texas Commission on Environmental Quality (TCEQ) Customer Number (CN) 601720345. The Liquefaction Plant and Regas Terminal have been assigned TCEQ Air Quality Account No. BL-A014-N and Regulated Entity Number (RN) 103196689 and are currently permitted under New Source Review (NSR) Permits No. 55464 and 100114, and Title V Permit No. O2878.

Freeport LNG submitted an application for a significant revision to the existing Title V Permit No. O2878 on November 4, 2025 which has been assigned TCEQ Project No. 39287. Please find the enclosed responses to the questions provided by email, dated December 17, 2025. Requests are included below in italics with Freeport LNG's responses following in bold.

- 1. Form OP-SUMR - Please submit Form OP-SUMR depicting the additional non-attainment permit, N304, that was added as an NSR authorization for several units.*

Form OP-SUMR is attached to this letter in Attachment 1.

- 2. Form OP-ACPS – Please submit an updated Form OP-ACPS now that the existing compliance situation has been resolved. I will update your permit terms and remove the compliance schedule.*

Form OP-ACPS is attached to this letter in Attachment 2.

- 3. Form OP-REQ1 – Part of this update is associated with the pending NSR amendment for this site. Please submit an update OP-REQ1, Page 88 & 89, with the most recent issuance dates for all listed authorizations.*

Form OP-REQ1, pages 88 & 89, is attached to this letter in Attachment 3 including the most recent issuance dates for the NSR and NNSR permit.

Mr. Kyle Murray – Page 2
January 20, 2026

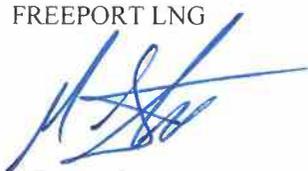
4. *Major NSR Summary Table – Please review the Major NSR Summary Table and provide any necessary updates associated with the pending NSR updates. If there are no further updates required, then please confirm this.*

Freeport has reviewed the NSR Summary Table and confirmed the only additional change required to the table is the NSR Permit issuance date. This date has been updated, and the table is included in Attachment 4 of this letter and electronically.

If you have any questions regarding this application update letter, please contact Thong Man, Freeport LNG, at (979) 230-4820, or by email at tman@freeportlng.com.

Sincerely,

FREEPORT LNG



Mike Stephenson
Director, Regulatory Affairs

Attachments and Enclosure

cc: EPA Region 6
Mr. Joseph Doby, TCEQ Region 12 – Houston
Mr. Thong Man, Freeport LNG
Ms. Deborah Walden-Hersh, Trinity Consultants

Attachment 1
TCEQ OP-SUMR Form

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

[Table 1](#)

Date	Permit No.	Regulated Entity No.
01/20/2026	O2878	RN103196689

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	11K-30	OP-UA15	PROPANE COMPRESSORS LUBE OIL VENTS		100114	N304
	1	11K-31	OP-UA15	LP MR COMPRESSORS LUBE OIL VENTS		100114	N304
	1	11K-32/11K-33	OP-UA15	MP/HP MR COMPRESSORS LUBE OIL VENTS		100114	N304
	1	12K-30	OP-UA15	PROPANE COMPRESSORS LUBE OIL VENTS		100114	N304
	1	12K-31	OP-UA15	LP MR COMPRESSORS LUBE OIL VENTS		100114	N304
	1	12K-32/12K-33	OP-UA15	MP/HP MR COMPRESSORS LUBE OIL VENTS		100114	N304
	1	13K-30	OP-UA15	PROPANE COMPRESSORS LUBE OIL VENTS		100114	N304
	1	13K-31	OP-UA15	LP MR COMPRESSORS LUBE OIL VENTS		100114	N304

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

[Table 1](#)

Date	Permit No.	Regulated Entity No.
01/20/2026	O2878	RN103196689

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	13K-32/13K-33	OP-UA15	MP/HP MR COMPRESSORS LUBE OIL VENTS		100114	N304
	1	14K-30	OP-UA15	PROPANE COMPRESSORS LUBE OIL VENTS		100114	N304
	1	14K-31	OP-UA15	LP MR COMPRESSORS LUBE OIL VENTS		100114	N304
	1	14K-32/14K-33	OP-UA15	MP/HP MR COMPRESSORS LUBE OIL VENTS		100114	N304
	1	17V-53A	OP-UA4	UNLOADING INTO PROPANE PRESSURIZED STORAGE TANK		100114	N304
	1	17V-53B	OP-UA4	UNLOADING INTO PROPANE PRESSURIZED STORAGE TANK		100114	N304
	1	17V-54A	OP-UA4	UNLOADING INTO ETHYLENE PRESSURIZED STORAGE TANK		100114	N304
	1	17V-54B	OP-UA4	UNLOADING INTO ETHYLENE PRESSURIZED STORAGE TANK		100114	N304

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

[Table 1](#)

Date	Permit No.	Regulated Entity No.
01/20/2026	O2878	RN103196689

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	ETHCOMP	OP-UA15	DEPRESSURIZE MR COMPRESSOR ETHYLENE		100114	N304
	1	FUG-LIQ123	OP-UA12	FUGITIVES - TRAIN 1-TRAIN 3		100114	N304
	1	FUG-LIQ4	OP-UA12	FUGITIVES - TRAIN 4		100114	N304
	1	LEACT-1	OP-UA4	BACKUP AIR COMPRESSOR TANK 1 UNLOADING		100114	N304
	1	LEACT-2	OP-UA4	BACKUP AIR COMPRESSOR TANK 2 UNLOADING		100114	N304
	1	LEGT-1	OP-UA4	EMERGENCY GENERATOR TANK 1 UNLOADING		100114	N304
	1	LEGT-2	OP-UA4	EMERGENCY GENERATOR TANK 2 UNLOADING		100114	N304
	1	LEGT-3	OP-UA4	EMERGENCY GENERATOR TANK 3 UNLOADING		100114	N304

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

[Table 1](#)

Date	Permit No.	Regulated Entity No.
01/20/2026	O2878	RN103196689

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	LEGT-4	OP-UA4	EMERGENCY GENERATOR TANK 4 UNLOADING		100114	N304
	1	LEGT-5	OP-UA4	EMERGENCY GENERATOR TANK 5 UNLOADING		100114	N304
	1	LEGT-6	OP-UA4	EMERGENCY GENERATOR TANK 6 UNLOADING		100114	N304
	1	LEGT-7	OP-UA4	EMERGENCY GENERATOR TANK 7 - TRAIN 4 UNLOADING		100114	N304
	1	LFWPT-1	OP-UA4	DIESEL FIREWATER TANK 1 UNLOADING		100114	N304
	1	LFWPT-2	OP-UA4	DIESEL FIREWATER TANK 2 UNLOADING		100114	N304
	1	LFWPT-3	OP-UA4	DIESEL FIREWATER TANK 3 UNLOADING		100114	N304

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

[Table 1](#)

Date	Permit No.	Regulated Entity No.
01/20/2026	O2878	RN103196689

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	LIQEAC-1	OP-UA2	EMERGENCY AIR COMPRESSOR		100114	N304
	1	LIQEAC-2	OP-UA2	TRAIN 4 - EMERGENCY AIR COMPRESSOR		100114	N304
	1	LIQEG-1	OP-UA2	EMERGENCY GENERATOR 1		100114	N304
	1	LIQEG-2	OP-UA2	EMERGENCY GENERATOR 2		100114	N304
	1	LIQEG-3	OP-UA2	EMERGENCY GENERATOR 3		100114	N304
	1	LIQEG-4	OP-UA2	EMERGENCY GENERATOR 4		100114	N304
	1	LIQEG-5	OP-UA2	EMERGENCY GENERATOR - GUARD HOUSE/ADMIN AREA		100114	N304
	1	LIQEG-6	OP-UA2	EMERGENCY GENERATOR - DOCK 2		100114	N304
	1	LIQEG-7	OP-UA2	TRAIN 4 - EMERGENCY GENERATOR 4		100114	N304

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

[Table 1](#)

Date	Permit No.	Regulated Entity No.
01/20/2026	O2878	RN103196689

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	LIQFLARE	OP-UA7, OP-UA15	LIQUEFACTION FLARE		100114	N304
	1	LIQFLAREMSS	OP-UA15	MAINTENANCE, STARTUP, SHUTDOWN (MSS) VENTING TO FL		100114	N304
	1	LIQFLR-MCH	OP-UA15	FINAL COOLING MCHE		100114	N304
	1	LIQFLR-PRO	OP-UA15	DEPRESSURIZE MR COMPRESSOR PROPANE		100114	N304
	1	LIQFLR-PSV	OP-UA15	PSV VENTS AND PUMP SEALS TO FLARE		100114	N304
	1	LIQFLR-TUR	OP-UA15	TURNDOWN LNG PRODUCTION		100114	N304
	1	LIQFWP-1	OP-UA2	FIRE WATER PUMP 1		100114	N304
	1	LIQFWP-2	OP-UA2	FIRE WATER PUMP 2		100114	N304

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

[Table 1](#)

Date	Permit No.	Regulated Entity No.
01/20/2026	O2878	RN103196689

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	LIQFWP-3	OP-UA2	FIRE WATER PUMP 3		100114	N304
	1	P1-DOCK	OP-UA4	PHASE I LNG VESSEL LOADING/UNLOADING DOCK		55464, 100114	N304
	1	P2-DOCK	OP-UA4	PHASE II LNG VESSEL LOADING/UNLOADING DOCK		55464, 100114	N304

Attachment 2
TCEQ OP-ACPS Form

**Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule**

Date: 01/20/2026	Regulated Entity No.: RN103196689	Permit No.: O2878
Company Name: Freeport LNG Development, L.P.		Area Name: Liquefaction Plant and Regas Terminal

- Part 1 of this form must be submitted with all initial FOP applications and renewal applications.
- The Responsible Official must use Form OP-CRO1 (Certification by Responsible Official) to certify information contained in this form in accordance with 30 TAC § 122.132(d)(8).

Part 1

A. Compliance Plan — Future Activity Committal Statement	
<p>The <i>Responsible Official</i> commits, utilizing reasonable effort, to the following: As the responsible official it is my intent that all emission units shall continue to be in compliance with all applicable requirements they are currently in compliance with, and all emission units shall be in compliance by the compliance dates with any applicable requirements that become effective during the permit term.</p>	
B. Compliance Certification - Statement for Units in Compliance* (Indicate response by entering an "X" in the appropriate column)	
1. With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. <i>(For reference only)</i>	
<p>* <i>For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirements and their corresponding emission units when assessing compliance status. For General Operating Permits (GOPs), the application documentation, particularly Form OP-REQ1 should be consulted as well as the requirements contained in the appropriate General Permits portion of 30 TAC Chapter 122.</i></p> <p><i>Compliance should be assessed based, at a minimum, on the required monitoring, testing, record keeping, and/or reporting requirements, as appropriate, associated with the applicable requirement in question.</i></p>	

Attachment 3
TCEQ OP-REQ1 Form

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 88)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
01/20/2026	O2878	RN103196689

For SOP applications, answer ALL questions unless otherwise directed.

◆ For GOP applications, answer ONLY these questions unless otherwise directed.

XII. NSR Authorizations (Attach additional sheets if necessary for sections XII.E-J.)

E. PSD Permits and PSD Major Pollutants

Permit No.	Issuance Date	Pollutant(s):	Permit No.	Issuance Date	Pollutant(s):

If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.

F. Nonattainment (NA) Permits and NA Major Pollutants

Permit No.	Issuance Date	Pollutant(s):	Permit No.	Issuance Date	Pollutant(s):
N304	12/19/2025	NO _x , VOC			

If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.

G. NSR Authorizations with FCAA § 112(g) Requirements

NSR Permit No.	Issuance Date	NSR Permit No.	Issuance Date	NSR Permit No	Issuance Date

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 89)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
01/20/2026	O2878	RN103196689

For SOP applications, answer ALL questions unless otherwise directed.

- ◆ For GOP applications, answer ONLY these questions unless otherwise directed.

XII. NSR Authorizations (continued) - (Attach additional sheets if necessary for sections XII.E-J.)

- ◆ **H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area**

Authorization No.	Issuance Date	Authorization No.	Issuance Date	Authorization No.	Issuance Date
55464	10/06/2025				
100114	12/19/2025				

- ◆ **I. Permits by Rule (30 TAC Chapter 106) for the Application Area**

A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.

PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date
106.122	09/04/2000	106.472	09/04/2000		
106.227	09/04/2000	106.473	09/04/2000		
106.263	11/01/2001	106.476	09/04/2000		
106.265	09/04/2000	106.492	09/04/2000		
106.355	11/01/2001	106.511	09/04/2000		
106.412	09/04/2000	106.532	09/04/2000		
106.433	09/04/2000				
106.452	09/04/2000				

- ◆ **J. Municipal Solid Waste and Industrial Hazardous Waste Permits with an Air Addendum**

Permit No.	Issuance Date	Permit No.	Issuance Date	Permit No.	Issuance Date

Attachment 4
Major NSR Summary Table

Major NSR Summary Table

Permit Numbers: 100114 and N304				Issuance Date: 12/19/2025			
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
LIQFLARE	Liquefaction Flare (Before construction of flare gas recovery and Train 4) (7)	NOx	80.10	47.43	5, 6, 7, 8, 14, 15, 17, 18, 19, 20	5, 8, 14, 15, 17, 18, 24	5, 8
		NOx (MSS)	6674.08				
		CO	318.99	188.91			
		CO (MSS)	26580.25				
		SO2	0.71	0.34			
		SO2 (MSS)	13.38				
		VOC	6.26	19.55			
VOC (MSS)	3538.79						
LIQFLARE	Liquefaction Flare (Before construction of Train 4 and after construction of flare gas recovery) (7)	NOx	40.16	40.19	5, 6, 7, 8, 14, 15, 17, 18, 19, 20	5, 8, 14, 15, 17, 18, 24	5, 8
		NOx (MSS)	6634.15				
		CO	159.95	160.07			
		CO (MSS)	26421.21				
		SO2	0.36	0.21			
		SO2 (MSS)	13.03				
		VOC	3.15	18.41			
VOC (MSS)	3535.68						
LIQFLARE	Liquefaction Flare (After construction of Train 4 and flare gas recovery) (7)	NOx	53.47	42.61	5, 6, 7, 8, 14, 15, 17, 18, 19, 20	5, 8, 14, 15, 17, 18, 24	5, 8
		NOx (MSS)	6647.46				
		CO	212.96	169.68			
		CO (MSS)	26474.23				
		SO2	0.47	0.25			
		SO2 (MSS)	13.15				
		VOC	4.19	18.79			
VOC (MSS)	3536.71						
LIQFWP-1	Fire Water Pump 1	NOx	3.25	0.16	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.85	0.04			
		PM	0.10	<0.01			
		PM10	0.10	<0.01			
		PM2.5	0.10	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.11	0.01			

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: 12/19/2025		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
LIQFWP-2	Fire Water Pump 2	NOx	3.25	0.16	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.85	0.04			
		PM	0.10	<0.01			
		PM10	0.10	<0.01			
		PM2.5	0.10	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0	0.01			
LIQFWP-3	Fire Water Pump 3	NOx	3.25	0.16	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.85	0.04			
		PM	0.10	<0.01			
		PM10	0.10	<0.01			
		PM2.5	0.10	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.11	0.0			
LIQEG-1	Emergency Generator 1 (DQFAH)	NOx	1.38	0.03	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2.00	0.05			
		PM	0.05	<0.01			
		PM10	0.05	<0.01			
		PM2.5	0.05	<0.01			
		SO2	0.02	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.13	<0.01			
		NH3	0.51	0.01			

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: 12/19/2025		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
LIQEG-2	Emergency Generator 2 (DQFAH)	NOx	1.38	0.03	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2.00	0.05			
		PM	0.05	<0.01			
		PM10	0.05	<0.01			
		PM2.5	0.05	<0.01			
		SO2	0.02	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.13	<0.01			
LIQEG-3	Emergency Generator 3 (DQFAH)	NOx	1.38	0.03	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2.00	0.05			
		PM	0.05	<0.01			
		PM10	0.05	<0.01			
		PM2.5	0.05	<0.01			
		SO2	0.02	<0.01			
		H2SO4	<0.01	<0.01			
		VOC	0.13	<0.01			
LIQEG-4	Emergency Generator 4 (DQFAH)	NOx	1.38	0.0	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2	0.05			
		PM	0.05	<0.01			
		PM10	0.05	<0.01			
		PM2.5	0.05	<0.01			
		SO2	0.02	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.13	<0.01			
LIQEG-5	Emergency Generator – Guard House/Admin Area (DQDAA)	NOx	3.50	0.09	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.79	0.02			
		PM	0.04	<0.01			
		PM10	0.04	<0.01			
		PM2.5	0.04	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.05	<0.01			

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: 12/19/2025		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
LIQEG-6	Emergency Generator – Dock 2 (DSGAD)	NOx	2.64	0.07	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.18	<0.01			
		PM	0.02	<0.01			
		PM10	0.02	<0.01			
		PM2.5	0.02	<0.01			
		SO2	<0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.02	<0.01			
LIQEG-7	Train 4 - Emergency Generator 4 (DQFAH)	NOx	1.38	0.03	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2.00	0.05			
		PM	0.05	<0.01			
		PM10	0.05	<0.01			
		PM2.5	0.05	<0.01			
		SO2	0.02	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.13	<0.01			
LIQEAC-1	Emergency Air Compressor (QSX15)	NOx	1.87	0.05	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	1.73	0.04			
		PM	0.10	<0.01			
		PM10	0.10	<0.01			
		PM2.5	0.10	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.10	<0.01			
LIQEAC-2	Train 4 - Emergency Air Compressor (QSX15)	NOx	1.87	0.05	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	1.73	0.04			
		PM	0	<0.01			
		PM10	0	<0.01			
		PM2.5	0	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.10	<0.01			
NH3	0.06	<0.01					

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: 12/19/2025		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
LEGT-1	Emergency Generator Tank 1	VOC	0.01	<0.01			
LEGT-2	Emergency Generator Tank 2	VOC	0.01	<0.01			
LEGT-3	Emergency Generator Tank 3	VOC	0.01	<0.01			
LEGT-4	Emergency Generator Tank 4	VOC	0.01	<0.01			
LEGT-5	Emergency Generator Tank 5	VOC	0.01	<0.01			
LEGT-6	Emergency Generator Tank 6	VOC	0.01	<0.01			
LEGT-7	Emergency Generator Tank 7 - Train 4	VOC	0.01	<0.01			
LEACT-1	Backup Air Compressor Tank 1	VOC	0.01	<0.01			
LEACT-2	Backup Air Compressor Tank 2 - Train 4	VOC	0.01	<0.01			
LFWPT-1	Diesel Firewater Tank 1	VOC	0.01	<0.01			
LFWPT-2	Diesel Firewater Tank 2	VOC	0.01	<0.01			
LFWPT-3	Diesel Firewater Tank 3	VOC	0.01	<0.01			
FUG-LIQ123	Fugitives Train 1 - Train 3 (6)	VOC	1.14	5.00	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
		VOC (9)	1.16	5.10	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
FUG-LIQ4	Fugitives Train 4 (6)	VOC	0.39	1.70	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
		VOC (9)	0.43	1.87	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
11K-30, 12K-30, 13K-30 14K-30 11K-31 12K-31 13K-31 14K-31 11K-32/11K-33 12K-32/12K-33 13K-32/13K-33 14K-32/14K-33	Propane Compressors Lube Oil Vent Propane Compressors Lube Oil Vent Propane Compressors Lube Oil Vent Propane Compressors Lube Oil Vent LP MR Compressors Lube Oil Vent MP/HP MR Compressor Lube Oil Vents MP/HP MR Compressor Lube Oil Vents MP/HP MR Compressor Lube Oil Vents MP/HP MR Compressor Lube Oil Vents	PM	0.03	0.11	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
	PM10	0.03	0.11				
	PM2.5	0.03	0.11				
	VOC	<0.01	<0.01				

Major NSR Summary Table							
Permit Numbers: 100114 and N304					Issuance Date: 12/19/2025		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
MSS-FUG1-3	Fugitives - Train 1 - Train 3 Vessel Opening for Maintenance	VOC	29.27	0.01	14, 15, 16, 17, 18, 21	14, 15, 16, 17, 18, 21, 24	14
MSS-FUG4	Fugitives - Train 4 Vessel Opening for Maintenance	VOC	29.27	0.01	14, 15, 16, 17, 18, 21	14, 15, 16, 17, 18, 21, 24	14
ALL	All EPNs at the site	Individual HAP	--	<10	--	--	--
		Total HAPs	--	<25			

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

(2) Specific point source name. For fugitive sources, use area name or fugitive source name.

(3) VOC - volatile organic compounds as defined in Title 29 Texas Administrative Code § 101.1

NOx - total oxides of nitrogen

SO₂ - sulfur dioxide

PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented

PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented

PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter

CO - carbon monoxide

H₂SO₄ - sulfuric acid mist

H₂S - hydrogen sulfide

NH₃ - ammonia

(4) Planned startup and shutdown (SS) lbs/hour emissions for all pollutants are authorized even if not specifically identified as SS.

(5) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period. Annual emission rates for each source include planned SS emissions.

(6) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

(7) Only one Flare operating scenario is authorized at a time.

(8) Sulfuric acid mist is a subset of PM_{2.5} emissions.

(9) Limit after the flare gas recovery has been installed.

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Wednesday, December 17, 2025 8:28 AM
To: Thong Man <TMan@FreeportLNG.com>
Cc: Michael Stephenson <MStephenson@freeportlng.com>; Scott Brooks <SBrooks@freeportlng.com>; Deborah Walden-Hersh <dwalden@trinityconsultants.com>; Sophia Gray <Sophia.Gray@trinityconsultants.com>
Subject: RE: [EXTERNAL]: WDP -- FOP O2878/Project 39287, Freeport LNG Development, L.P. - Freeport LNG Regas Facility and Liquefaction Plant

Good morning all,

I have reviewed your comments on the WDP and have listed some minor items that I will need in order to document your requested changes. You may wait until the pending NSR Amendments have been finalized before submitting the OP-REQ1. I will not provide a deadline at this time but will continue to monitor the status of those updates.

1. **Form OP-SUMR** - Please submit Form OP-SUMR depicting the additional non-attainment permit, N304, that was added as an NSR authorization for several units.
2. **Form OP-ACPS** – Please submit an updated Form OP-ACPS now that the existing compliance situation has been resolved. I will update your permit terms and remove the compliance schedule.
3. **Form OP-REQ1** – Part of this update is associated with the pending NSR amendment for this site. Please submit an update OP-REQ1, Page 88 & 89, with the most recent issuance dates for all listed authorizations.
4. **Major NSR Summary Table** – Please review the Major NSR Summary Table and provide any necessary updates associated with the pending NSR updates. If there are no further updates required, then please confirm this.

Let me know if you would have any questions. Thank you!

Sincerely,

Kyle J. Murray

Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC 163, P.O. Box 13087
Austin, TX 78711-3087
kyle.murray@tceq.texas.gov

Phone: (512) 239-1279

Fax: (512) 239-1400



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Thong Man <TMan@FreeportLNG.com>
Sent: Thursday, December 4, 2025 9:55 AM
To: Kyle Murray
Cc: Michael Stephenson; Scott Brooks; Deborah Walden-Hersh; Sophia Gray
Subject: RE: [EXTERNAL]: WDP -- FOP O2878/Project 39287, Freeport LNG Development, L.P. - Freeport LNG Regas Facility and Liquefaction Plant
Attachments: WDP - O2878 Freeport LNG (Significant, 39287)_Comments.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning Kyle,

We reviewed the Working Draft Permit (WDP) for O2878 and had some comments. Please let us know if you have any questions.

Thank you,

Thong Man P.E.
Regulatory Compliance Engineer
LQF – 1500 Lamar Street, Quintana, Texas 77541
Office: 979-230-4820
Cell: 469-450-9073



From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Thursday, November 20, 2025 7:41 PM
To: Thong Man <TMan@FreeportLNG.com>; Deborah Walden-Hersh <dwalden@trinityconsultants.com>
Cc: Michael Stephenson <MStephenson@freeportlng.com>; Scott Brooks <SBrooks@freeportlng.com>; Sophia Gray <Sophia.Gray@trinityconsultants.com>
Subject: [EXTERNAL]: WDP -- FOP O2878/Project 39287, Freeport LNG Development, L.P. - Freeport LNG Regas Facility and Liquefaction Plant

Good evening all,

I have conducted a technical review of the significant revision application for Freeport LNG Development, L.P. - Freeport LNG Regas Facility and Liquefaction Plant. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided. Please review the WDP and submit to me any

New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits by Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 55464	Issuance Date: 140/4906/20254
Authorization No.: 100114	Issuance Date: 06/29/2020Pending
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.122	Version No./Date: 09/04/2000
Number: 106.227	Version No./Date: 09/04/2000
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.265	Version No./Date: 09/04/2000
Number: 106.355	Version No./Date: 11/01/2001
Number: 106.412	Version No./Date: 09/04/2000
Number: 106.433	Version No./Date: 09/04/2000
Number: 106.452	Version No./Date: 09/04/2000
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.473	Version No./Date: 09/04/2000
Number: 106.476	Version No./Date: 09/04/2000
Number: 106.492	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 09/04/2000
Number: 106.532	Version No./Date: 09/04/2000

- Commented [DW1]:** Kyle, the new nonattainment permit N304 needs to be added to this section.
- Commented [DW2]:** Kyle, this was updated to match the OP-REQ1 dated 11/3/25.
- Commented [DW3]:** Kyle, just inserting this as a placeholder for future updating.

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
11K-30	PROPANE COMPRESSORS LUBE OIL VENTS	100114, N304
11K-31	LP MR COMPRESSORS LUBE OIL VENTS	100114, N304
11K-32/11K-33	MP/HP MR COMPRESSORS LUBE OIL VENTS	100114, N304
12K-30	PROPANE COMPRESSORS LUBE OIL VENTS	100114, N304
12K-31	LP MR COMPRESSORS LUBE OIL VENTS	100114, N304
12K-32/12K-33	MP/HP MR COMPRESSORS LUBE OIL VENTS	100114, N304
13K-30	PROPANE COMPRESSORS LUBE OIL VENTS	100114, N304
13K-31	LP MR COMPRESSORS LUBE OIL VENTS	100114, N304
13K-32/13K-33	MP/HP MR COMPRESSORS LUBE OIL VENTS	100114, N304
14K-30	PROPANE COMPRESSORS LUBE OIL VENTS	100114, N304
14K-31	LP MR COMPRESSORS LUBE OIL VENTS	100114, N304
14K-32/14K-33	MP/HP MR COMPRESSORS LUBE OIL VENTS	100114, N304
17U-50	STORM DRAIN UNIT	106.532/09/04/2000
17U-61	STORM DRAIN UNIT	106.532/09/04/2000
17U-62	STORM DRAIN UNIT	106.532/09/04/2000
17U-63	STORM DRAIN UNIT	106.532/09/04/2000
17V-53A	PROPANE TANK A	106.476/09/04/2000
17V-53A	UNLOADING INTO PROPANE PRESSURIZED STORAGE TANK	100114, N304
17V-53B	PROPANE TANK B	106.476/09/04/2000
17V-53B	UNLOADING INTO PROPANE PRESSURIZED STORAGE TANK	100114, N304
17V-54A	ETHYLENE TANK A	106.476/09/04/2000

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
17V-54A	UNLOADING INTO ETHYLENE PRESSURIZED STORAGE TANK	100114, N304
17V-54B	ETHYLENE TANK B	106.476/09/04/2000
17V-54B	UNLOADING INTO ETHYLENE PRESSURIZED STORAGE TANK	100114, N304
18T-3	LNG STORAGE TANK 3	106.476/09/04/2000
18U-50	STORM DRAIN UNIT	106.532/09/04/2000
B-1A	HEATER B-1A	55464
B-1B	HEATER B-1B	55464
B-1C	HEATER B-1C	55464
B-1D	HEATER B-1D	55464
B-1E	HEATER B-1E	55464
B-1F	HEATER B-1F	55464
B-1G	HEATER B-1G	55464
B-1H	HEATER B-1H	55464
B-1J	HEATER B-1J	55464
CUBE-DIES	UNLOADING INTO DIESEL CUBE TANK	106.412/09/04/2000
CUBE-GAS	UNLOADING INTO GASOLINE CUBE TANK	106.412/09/04/2000
EG-1	EMERGENCY GENERATOR EG-1	55464
EG-1TK	EMERGENCY GENERATOR EG-1 DIESEL DAY TANK	55464
EG-ADMIN	EMERGENCY GENERATOR EG-ADMIN	55464
EG-ADMINTK	EMERG GENERATOR EG-ADMIN DIESEL DAY TANK	55464
EG-DOCK	EMERGENCY GENERATOR EG-DOCK	55464

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
EG-DOCKTK	EMERG GENERATOR EG-DOCK DIESEL DAY TANK	55464
ETHCOMP	DEPRESSURIZE MR COMPRESSOR ETHYLENE	100114, N304
FLR	FLARE	55464
FUG	FUGITIVES	55464
FUG-BOGLIQ	BOG LIQUEFACTION SYSTEM FUGITIVES	55464
FUG-LIQ123	FUGITIVES - TRAIN 1-TRAIN 3	100114, N304
FUG-LIQ4	FUGITIVES - TRAIN 4	100114, N304
FUG-PHII	PHASE II FUGITIVES	55464
FWP2	DIESEL-FUELED FIRE WATER PUMP	106.511/09/04/2000
FWPTK	FIRE WATER PUMP DIESEL DAY TANK	55464
JAM-DIES	UNLOADING INTO JAM DIESEL TANK	106.412/09/04/2000
K-7A	COMPRESSOR K-7A	55464
K-7B	COMPRESSOR K-7B	55464
K-7C	COMPRESSOR K-7C	55464
LEACT-1	BACKUP AIR COMPRESSOR TANK 1 UNLOADING	100114, N304
LEACT-2	BACKUP AIR COMPRESSOR TANK 2 UNLOADING	100114, N304
LEGT-1	EMERGENCY GENERATOR TANK 1 UNLOADING	100114, N304
LEGT-2	EMERGENCY GENERATOR TANK 2 UNLOADING	100114, N304
LEGT-3	EMERGENCY GENERATOR TANK 3 UNLOADING	100114, N304
LEGT-4	EMERGENCY GENERATOR TANK 4 UNLOADING	100114, N304
LEGT-5	EMERGENCY GENERATOR TANK 5 UNLOADING	100114, N304

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
LEGT-6	EMERGENCY GENERATOR TANK 6 UNLOADING	100114, N304
LEGT-7	EMERGENCY GENERATOR TANK 7 - TRAIN 4 UNLOADING	100114, N304
LFWPT-1	DIESEL FIREWATER TANK 1 UNLOADING	100114, N304
LFWPT-2	DIESEL FIREWATER TANK 2 UNLOADING	100114, N304
LFWPT-3	DIESEL FIREWATER TANK 3 UNLOADING	100114, N304
LIQEAC-1	EMERGENCY AIR COMPRESSOR	100114, N304
LIQEAC-2	TRAIN 4 - EMERGENCY AIR COMPRESSOR	100114, N304
LIQEG-1	EMERGENCY GENERATOR 1	100114, N304
LIQEG-2	EMERGENCY GENERATOR 2	100114, N304
LIQEG-3	EMERGENCY GENERATOR 3	100114, N304
LIQEG-4	EMERGENCY GENERATOR 4	100114, N304
LIQEG-5	EMERGENCY GENERATOR - GUARD HOUSE/ADMIN AREA	100114, N304
LIQEG-6	EMERGENCY GENERATOR - DOCK 2	100114, N304
LIQEG-7	TRAIN 4 - EMERGENCY GENERATOR 4	100114, N304
LIQFLARE	LIQUEFACTION FLARE	100114, N304
LIQFLAREMSS	MAINTENANCE, STARTUP, SHUTDOWN (MSS) VENTING TO FL	100114, N304
LIQFLR-MCH	FINAL COOLING MCH	100114, N304
LIQFLR-PRO	DEPRESSURIZE MR COMPRESSOR PROPANE	100114, N304
LIQFLR-PSV	PSV VENTS AND PUMP SEALS TO FLARE	100114, N304
LIQFLR-TUR	TURNDOWN LNG PRODUCTION	100114, N304
LIQFWP-1	FIRE WATER PUMP 1	100114, N304

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
LIQFWP-2	FIRE WATER PUMP 2	100114, N304
LIQFWP-3	FIRE WATER PUMP 3	100114, N304
P1-DOCK	PHASE I LNG VESSEL LOADING/UNLOADING DOCK	55464, 100114, N304
P2-DOCK	PHASE II LNG VESSEL LOADING/UNLOADING DOCK	55464, 100114, N304
STC-2400	STORM DRAIN UNIT	106.532/09/04/2000
STC-T-1	STORM DRAIN UNIT	106.532/09/04/2000
STC-T-2	STORM DRAIN UNIT	106.532/09/04/2000
STC-T-3	STORM DRAIN UNIT	106.532/09/04/2000
STC-T-4	STORM DRAIN UNIT	106.532/09/04/2000
T-1	LNG STORAGE TANK 1	106.476/09/04/2000
T-2	LNG STORAGE TANK 2	106.476/09/04/2000
Z-10	EMERGENCY AIR COMPRESSOR Z-10	55464
Z-10TK	EMERGENCY AIR COMPRESSOR Z-10 DIESEL DAY TANK	55464
Z-210	EMERGENCY AIR COMPRESSOR Z-210	55464
Z-210TK	EMERG AIR COMPRESSOR Z-210 DIESEL DAY TANK	55464

**This column may include Permit by Rule (PBR) numbers and version dates, PBR Registration numbers in brackets, Standard Permit Registration numbers, Minor NSR permit numbers, and Major NSR permit numbers.

Schedules

Compliance Schedule..... 61

Compliance Schedule

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/ Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
LIQFLARE	N/A	NOx	NSR Permit 100114 General Conditions and Special Conditions	The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on MAERT.
2. Compliance Status Assessment Method and Records Location				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description		Regulatory Compliance Office, Quintana, Texas	
NSR Permit 100114, Special Condition 7.E	Emission estimates based on continuous monitoring of vent gas composition and flow to the flare.			
3. Non-compliance Situation Description				
NOx emissions from the Liquefaction Flare are estimated to be above NSR Permit 100114 MAERT.				
4. Corrective Action Plan Description				
The emission limits were updated in permit amendment application submitted to TCEQ on 08/09/2022.				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
1	The emission limits were updated in permit amendment application submitted to TCEQ on 08/09/2022.			
2	Freeport LNG Development LP shall submit a Title V revision application to incorporate the amendment into SOP No. O2878 within 90 days of the issuance of the NSR amendment.			
3	Freeport LNG Development LP will continue to report Title V deviations until the corrective action plan is completed."			
4	Freeport LNG Development LP shall submit a confirmation letter to TCEQ once the corrective action plan is completed.			
6. Previously Submitted Compliance Plan(s)		Type of Action		Date Submitted
		N/A		N/A
7. Progress Report Submission Schedule		Progress reports will be submitted semi-annually with deviation reports.		

Commented [DW4]: Kyle, this compliance schedule is resolved via this significant revision. Is there anything we need to send you to remove this compliance schedule?

Compliance Schedule

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/ Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
LIQFLARE	N/A	CO	NSR Permit 100114 General Conditions and Special Conditions	The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on MAERT.
2. Compliance Status Assessment Method and Records Location				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description			
NSR Permit 100114, Special Condition 7.E	Emission estimates based on continuous monitoring of vent gas composition and flow to the flare.		Regulatory Compliance Office, Quintana, Texas	
3. Non-compliance Situation Description				
CO emissions from the Liquefaction Flare are estimated to be above NSR Permit 100114 MAERT.				
4. Corrective Action Plan Description				
The emission limits were updated in permit amendment application submitted to TCEQ on 08/09/2022.				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
1	The emission limits were updated in permit amendment application submitted to TCEQ on 08/09/2022.			
2	Freeport LNG Development LP shall submit a Title V revision application to incorporate the amendment into SOP No. O2878 within 90 days of the issuance of the NSR amendment			
3	Freeport LNG Development LP will continue to report Title V deviations until the corrective action plan is completed.			
4	Freeport LNG Development LP shall submit a confirmation letter to TCEQ once the corrective action plan is completed.			
6. Previously Submitted Compliance Plan(s)		Type of Action		Date Submitted
		N/A		N/A
7. Progress Report Submission Schedule		Progress reports will be submitted semi-annually with deviation reports.		

Commented [DW5]: Kyle, this compliance schedule is resolved via this significant revision. Is there anything we need to send you to remove this compliance schedule?

Compliance Schedule

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/ Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
LIQFLARE	N/A	VOC	NSR Permit 100114 General Conditions and Special Conditions	The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on MAERT.
2. Compliance Status Assessment Method and Records Location				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description			
NSR Permit 100114, Special Condition 7.E	Emission estimates based on continuous monitoring of vent gas composition and flow to the flare.		Regulatory Compliance Office, Quintana, Texas	
3. Non-compliance Situation Description				
VOC emissions from the Liquefaction Flare are estimated to be above NSR Permit 100114 MAERT.				
4. Corrective Action Plan Description				
The emission limits were updated in permit amendment application submitted to TCEQ on 08/09/2022.				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
1	The emission limits were updated in permit amendment application submitted to TCEQ on 08/09/2022.			
2	Freeport LNG Development LP shall submit a Title V revision application to incorporate the amendment into SOP No. O2878 within 90 days of the issuance of the NSR amendment.			
3	Freeport LNG Development LP will continue to report Title V deviations until the corrective action plan is completed.			
4	Freeport LNG Development LP shall submit a confirmation letter to TCEQ once the corrective action plan is completed.			
6. Previously Submitted Compliance Plan(s)		Type of Action		Date Submitted
		N/A		N/A
7. Progress Report Submission Schedule		Progress reports will be submitted semi-annually with deviation reports.		

Commented [DW6]: Kyle, this compliance schedule is resolved via this significant revision. Is there anything we need to send you to remove this compliance schedule?

Major NSR Summary Table

Permit Numbers: 100114 and N304				Issuance Date: TBD			
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
LIQFLARE	Liquefaction Flare (Before construction of flare gas recovery and Train 4) (7)	NO _x	80.10	47.43	5, 6, 7, 8, 14, 15, 17, 18, 19, 20	5, 8, 14, 15, 17, 18, 24	5, 8
		NO _x (MSS)	6674.08				
		CO	318.99	188.91			
		CO (MSS)	26580.25				
		SO ₂	0.71	0.34			
		SO ₂ (MSS)	13.38				
		VOC	6.26	19.55			
VOC (MSS)	3538.799						
LIQFLARE	Liquefaction Flare (Before construction of Train 4 and after construction of flare gas recovery) (7)	NO _x	40.16	40.19	5, 6, 7, 8, 14, 15, 17, 18, 19, 20	5, 8, 14, 15, 17, 18, 24	5, 8
		NO _x (MSS)	6634.15				
		CO	159.95	160.07			
		CO (MSS)	26421.21				
		SO ₂	0.36	0.21			
		SO ₂ (MSS)	13.03				
		VOC	3.15	18.41			
VOC (MSS)	3535.68						
LIQFLARE	Liquefaction Flare (After construction of Train 4 and flare gas recovery) (7)	NO _x	53.47	42.61	5, 6, 7, 8, 14, 15, 17, 18, 19, 20	5, 8, 14, 15, 17, 18, 24	5, 8
		NO _x (MSS)	6647.46				
		CO	212.96	169.68			
		CO (MSS)	26474.23				
		SO ₂	0.47	0.25			
SO ₂ (MSS)	13.15						

Commented [IM7]: Kyle, the digits after the decimal were hidden due to rounding in the NSR Summary table excel workbook for some of the emission rates here and there were a few typographical errors so we have corrected in tracked changes here.

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
		VOC	4.19	18.79			
		VOC (MSS)	3536.71				
LIQFWP-1	Fire Water Pump 1	NO _x	3.25	0.16	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.85	0.04			
		PM	0.10	<0.01			
		PM ₁₀	0.10	<0.01			
		PM _{2.5}	0.10	<0.01			
		SO ₂	0.01	<0.01			
		H ₂ SO ₄ (8)	<0.01	<0.01			
		VOC	0.11	0.01			
LIQFWP-2	Fire Water Pump 2	NO _x	3.25 <u>3.250-8</u>	0.16	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.85 <u>0.852-44</u>	0.04			
		PM	0.10 <u>0.100-92</u>	<0.01			
		PM ₁₀	0.10 <u>0.100-92</u>	<0.01			
		PM _{2.5}	0.10 <u>0.100-92</u>	<0.01			
		SO ₂	0.01 <u>0.010-08</u>	<0.01			
		H ₂ SO ₄ (8)	<0.01	<0.01			
		VOC	0.11 <u>0.11</u>	0.01			
LIQFWP-3	Fire Water Pump 3	NO _x	3.25	0.16	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.85	0.04			
		PM	<u>0.10</u>	<0.01			
		PM ₁₀	<u>0.10</u>	<0.01			

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
		PM _{2.5}	0.10	<0.01			
		SO ₂	0.01	<0.01			
		H ₂ SO ₄ (8)	<0.01	<0.01			
		VOC	0.11	0.01			
LIQEG-1	Emergency Generator 1 (DQFAH)	NO _x	1.38	0.03	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2.00	0.05			
		PM	0.05	<0.01			
		PM ₁₀	0.05	<0.01			
		PM _{2.5}	0.05	<0.01			
		SO ₂	0.02	<0.01			
		H ₂ SO ₄ (8)	<0.01	<0.01			
		VOC	0.13	<0.01			
		NH ₃	0.51	0.01			
LIQEG-2	Emergency Generator 2 (DQFAH)	NO _x	1.38	0.03	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2.00	0.05			
		PM	0.05	<0.01			
		PM ₁₀	0.05	<0.01			
		PM _{2.5}	0.05	<0.01			
		SO ₂	0.02	<0.01			
		H ₂ SO ₄ (8)	<0.01	<0.01			
		VOC	0.13	<0.01			
		NH ₃	0.51	0.01			

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
LIQEG-3	Emergency Generator 3 (DQFAH)	NO _x	1.38	0.03	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2.00	0.05			
		PM	0.05	<0.01			
		PM ₁₀	0.05	<0.01			
		PM _{2.5}	0.05	<0.01			
		SO ₂	0.02	<0.01			
		H ₂ SO ₄ (8)	<0.01	<0.01			
		VOC	0.13	<0.01			
		NH ₃	0.51	0.01			
LIQEG-4	Emergency Generator 4 (DQFAH)	NO _x	1.38	0.03	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2.00	0.05			
		PM	0.05	<0.01			
		PM ₁₀	0.05	<0.01			
		PM _{2.5}	0.05	<0.01			
		SO ₂	0.02	<0.01			
		H ₂ SO ₄ (8)	<0.01	<0.01			
		VOC	0.13	<0.01			
		NH ₃	0.51	0.01			
LIQEG-5	Emergency Generator – Guard House/Admin Area (DQDAA)	NO _x	3.50	0.09	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.79	0.02			
		PM	0.04	<0.01			
		PM ₁₀	0.04	<0.01			

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
		PM _{2.5}	0.04	<0.01			
		SO ₂	0.01	<0.01			
		H ₂ SO ₄ (8)	<0.01	<0.01			
		VOC	0.05	<0.01			
LIQEG-6	Emergency Generator – Dock 2 (DSGAD)	NO _x	2.64	0.07	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.18	<0.01			
		PM	0.02	<0.01			
		PM ₁₀	0.02	<0.01			
		PM _{2.5}	0.02	<0.01			
		SO ₂	<0.01	<0.01			
		H ₂ SO ₄ (8)	<0.01	<0.01			
		VOC	0.02	<0.01			
LIQEG-7	Train 4 - Emergency Generator 4 (DQFAH)	NO _x	1.38	0.03	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2.00	0.05			
		PM	0.05	<0.01			
		PM ₁₀	0.05	<0.01			
		PM _{2.5}	0.05	<0.01			
		SO ₂	0.02	<0.01			
		H ₂ SO ₄ (8)	<0.01	<0.01			
		VOC	0.13	<0.01			
LIQEAC-1	Emergency Air	NO _x	1.87	0.05	3, 4, 9	3, 4, 9, 24	3, 4, 9

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
	Compressor (QSX15)	CO	1.73	0.04			
		PM	0.10	<0.01			
		PM ₁₀	0.10	<0.01			
		PM _{2.5}	0.10	<0.01			
		SO ₂	0.01	<0.01			
		H ₂ SO ₄ (8)	<0.01	<0.01			
		VOC	0.10	<0.01			
		NH ₃	0.06	<0.01			
LIQEAC-2	Train 4 - Emergency Air Compressor (QSX15)	NO _x	1.87	0.05	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	1.73	0.04			
		PM	0.10	<0.01			
		PM ₁₀	0.10	<0.01			
		PM _{2.5}	0.10	<0.01			
		SO ₂	0.01	<0.01			
		H ₂ SO ₄	<0.01	<0.01			
		VOC	0.10	<0.01			
LEG-1	Emergency Generator Tank 1	VOC	0.01	<0.01			
LEG-2	Emergency Generator Tank 2	VOC	0.01	<0.01			
LEG-3	Emergency Generator Tank 3	VOC	0.01	<0.01			
LEG-4	Emergency Generator	VOC	0.01	<0.01			

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
	Tank 4						
LEGT-5	Emergency Generator Tank 5	VOC	0.01	<0.01			
LEGT-6	Emergency Generator Tank 6	VOC	0.01	<0.01			
LEGT-7	Emergency Generator Tank 7 – Train 4	VOC	0.01	<0.01			
LEACT-1	Backup Air Compressor Tank 1	VOC	0.01	<0.01			
LEACT-2	Backup Air Compressor Tank 2 - Train 4	VOC	0.01	<0.01			
LFWPT-1	Diesel Firewater Tank 1	VOC	0.01	<0.01			
LFWPT-2	Diesel Firewater Tank 2	VOC	0.01	<0.01			
LFWPT-3	Diesel Firewater Tank 3	VOC	0.01	<0.01			
FUG-LIQ123	Fugitives Train 1 – Train 3 (6)	VOC	1.14	5.00	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
		VOC (9)	1.16	5.10	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
FUG-LIQ4	Fugitives Train 4 (6)	VOC	0.39	1.70	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
		VOC (9)	0.43	1.87	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
11K-30, 12K-30, 13K-30, 14K-30, 11K-31, 12K-31, 13K-31, 14K-31, 11K-32/11K-33, 12K-32/12K-33	Propane Compressors Lube Oil Vent	PM	0.03	0.11	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
		PM ₁₀	0.03	0.11			
		PM _{2.5}	0.03	0.11			
		VOC	<0.01	<0.01			

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
13K-32/13K-33 14K-32/14K-33	LP MR Compressors Lube Oil Vent LP MR Compressors Lube Oil Vent MP/HP MR Compressor Lube Oil Vents MP/HP MR Compressor Lube Oil Vents MP/HP MR Compressor Lube Oil Vents MP/HP MR Compressor Lube Oil Vents						
MSS-FUG1-3	Fugitives - Train 1 - Train 3 Vessel Opening for Maintenance	VOC	29.27	0.044	14, 15, 16, 17, 18, 21	14, 15, 16, 17, 18, 21, 24	14
MSS-FUG4	Fugitives - Train 4 Vessel Opening for Maintenance	VOC	29.27	0.01	14, 15, 16, 17, 18, 21	14, 15, 16, 17, 18, 21, 24	14
ALL	All EPNs at the site	Individual HAP	-	<10			
		Total HAPs	-	<25			

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) VOC
 - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
 - NO_x - total oxides of nitrogen
 - SO₂ - sulfur dioxide
 - PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
 - PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
 - PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
 - CO - carbon monoxide
 - H₂SO₄ - sulfuric acid mist
 - H₂S - hydrogen sulfide
 - NH₃ - ammonia
- (4) Planned startup and shutdown (SS) lbs/hour emissions for all pollutants are authorized even if not specifically identified as SS.

comments you have on the working draft permit by **Friday, December 5th** . I have also included some notes below.

- I have included the Major NSR Summary Table in the WDP as depicted in your application. The issuance date is still pending as I am sure you are aware. When the NSR permit is issued I will need you make any applicable updates to the Major NSR Summary Table (most likely just the issuance date). I will also need you to update the issuance dates on the OP-REQ1 (Pages 88-89). I will be prepared to issue the Public Notice Authorization Package (PNAP) as soon as possible, but until then we are just waiting for the issuance of the NSR permit (No. 100114/N304).

Please review the second portion of the “SOP Technical Review Fact Sheet” located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified application information, including application updates supporting the WDP comments, is required. After final review of the WDP, additional changes supported by application updates may require certification. I will advise you of these changes at a later date. Prior to transmittal of the Public Notice/Announcement Authorization Package, a duly signed OP-CRO1 form may be required which includes the specific dates or time-period of all submitted application documentation that was not previously certified. I will advise you of this requirement prior to sending the Public Notice/Announcement Authorization.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Sincerely,

Kyle J. Murray

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality
MC 163, P.O. Box 13087
Austin, TX 78711-3087
kyle.murray@tceq.texas.gov

Phone: (512) 239-1279
Fax: (512) 239-1400



How are we doing? Fill out our online customer
satisfaction survey
at www.tceq.texas.gov/customersurvey

From: Deborah Walden-Hersh <dwalden@trinityconsultants.com>
Sent: Thursday, November 20, 2025 3:04 PM
To: Kyle Murray
Cc: Thong Man; Michael Stephenson; Scott Brooks; Sophia Gray
Subject: Freeport LNG Liquefaction Facility - Permit O2878 - Editable Major NSR Summary Table
Attachments: LQF NSR Summary Table (2025-1120).xlsx
Follow Up Flag: Follow up
Flag Status: Flagged

Kyle,

Per our conversation today, please find attached an editable version of the Major NSR Summary table that was included in the O2878 application. It is in Excel, rather than Word, but hopefully that is helpful to you.

Thanks,
Deborah

Deborah Walden-Hersh
Principal Consultant

P 512.349.5800 x4426 M 512.608.1070
Email: dwalden@trinityconsultants.com
9737 Great Hills Trail, Suite 340, Austin, Texas 78759



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 [Book time to meet with me](#)

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
LIQFLARE	Liquefaction Flare (Before construction of flare gas recovery and Train 4) (7)	NOx	80.1	47.43	5, 6, 7, 8, 14, 15, 17, 18, 19, 20	5, 8, 14, 15, 17, 18, 24	5, 8
		NOx (MSS)	6674.08				
		CO	318.99	188.91			
		CO (MSS)	26580.25				
		SO2	0.71	0.34			
		SO2 (MSS)	13.38				
		VOC	6.26	19.55			
		VOC (MSS)	3539				
LIQFLARE	Liquefaction Flare (Before construction of Train 4 and after construction of flare gas recovery) (7)	NOx	40.16	40.19	5, 6, 7, 8, 14, 15, 17, 18, 19, 20	5, 8, 14, 15, 17,18, 24	5, 8
		NOx (MSS)	6634.15				
		CO	159.95	160.07			
		CO (MSS)	26421.21				
		SO2	0.36	0.21			
		SO2 (MSS)	13.03				
		VOC	3.15	18.41			
		VOC (MSS)	3536				
LIQFLARE	Liquefaction Flare (After construction of Train 4 and flare gas recovery) (7)	NOx	53.47	42.61	5, 6, 7, 8, 14, 15, 17, 18, 19, 20	5, 8, 14, 15, 17,18, 24	5, 8
		NOx (MSS)	6647.46				
		CO	212.96	169.68			
		CO (MSS)	26474.23				
		SO2	0.47	0.25			
		SO2 (MSS)	13.15				
		VOC	4.19	18.79			
		VOC (MSS)	3536.71				
LIQFWP-1	Fire Water Pump 1	NOx	3.25	0.16	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.85	0.04			
		PM	0.10	<0.01			
		PM10	0.10	<0.01			
		PM2.5	0.10	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.11	0.01			

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
LIQFWP-2	Fire Water Pump 2	NOx	3.3	0.16	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.85	0.04			
		PM	0.10	<0.01			
		PM10	0.10	<0.01			
		PM2.5	0.10	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0	0.01			
LIQFWP-3	Fire Water Pump 3	NOx	3.25	0.16	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.85	0.04			
		PM	0.1	<0.01			
		PM10	0.1	<0.01			
		PM2.5	0.1	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.11	0.0			
LIQEG-1	Emergency Generator 1 (DQFAH)	NOx	1.38	0.03	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2.00	0.05			
		PM	0.05	<0.01			
		PM10	0.05	<0.01			
		PM2.5	0.05	<0.01			
		SO2	0.02	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.13	<0.01			
NH3	0.51	0.01					

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
LIQEG-2	Emergency Generator 2 (DQFAH)	NOx	1.38	0.03	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2.00	0.05			
		PM	0.05	<0.01			
		PM10	0.05	<0.01			
		PM2.5	0.05	<0.01			
		SO2	0.02	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.13	<0.01			
		NH3	0.51	0.01			
LIQEG-3	Emergency Generator 3 (DQFAH)	NOx	1.38	0.03	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2.00	0.05			
		PM	0.05	<0.01			
		PM10	0.05	<0.01			
		PM2.5	0.05	<0.01			
		SO2	0.02	<0.01			
		H2SO4	<0.01	<0.01			
		VOC	0.13	<0.01			
		NH3	0.51	0.01			
LIQEG-4	Emergency Generator 4 (DQFAH)	NOx	1.38	0.0	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2	0.05			
		PM	0.05	<0.01			
		PM10	0.05	<0.01			
		PM2.5	0.05	<0.01			
		SO2	0.02	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.13	<0.01			
		NH3	0.51	0.01			
LIQEG-5	Emergency Generator – Guard House/Admin Area (DQDAA)	NOx	3.50	0.09	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.79	0.02			
		PM	0.04	<0.01			
		PM10	0.04	<0.01			
		PM2.5	0.04	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.05	<0.01			

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
LIQEG-6	Emergency Generator - Dock 2 (DSGAD)	NOx	2.64	0.07	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.18	<0.01			
		PM	0.02	<0.01			
		PM10	0.02	<0.01			
		PM2.5	0.02	<0.01			
		SO2	<0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.02	<0.01			
LIQEG-7	Train 4 - Emergency Generator 4 (DQFAH)	NOx	1.38	0.03	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2.00	0.05			
		PM	0.05	<0.01			
		PM10	0.05	<0.01			
		PM2.5	0.05	<0.01			
		SO2	0.02	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.13	<0.01			
		NH3	0.51	0.01			
LIQEAC-1	Emergency Air Compressor (QX15)	NOx	1.87	0.05	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	1.73	0.04			
		PM	0.10	<0.01			
		PM10	0.10	<0.01			
		PM2.5	0.10	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.10	<0.01			
		NH3	0.06	<0.01			
LIQEAC-2	Train 4 - Emergency Air Compressor (QX15)	NOx	1.87	0.05	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	1.73	0.04			
		PM	0	<0.01			
		PM10	0	<0.01			
		PM2.5	0	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.10	<0.01			
		NH3	0.06	<0.01			

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
LEGT-1	Emergency Generator Tank 1	VOC	0.01	<0.01			
LEGT-2	Emergency Generator Tank 2	VOC	0.01	<0.01			
LEGT-3	Emergency Generator Tank 3	VOC	0.01	<0.01			
LEGT-4	Emergency Generator Tank 4	VOC	0.01	<0.01			
LEGT-5	Emergency Generator Tank 5	VOC	0.01	<0.01			
LEGT-6	Emergency Generator Tank 6	VOC	0.01	<0.01			
LEGT-7	Emergency Generator Tank 7 – Train 4	VOC	0.01	<0.01			
LEACT-1	Backup Air Compressor Tank 1	VOC	0.01	<0.01			
LEACT-2	Backup Air Compressor Tank 2 - Train 4	VOC	0.01	<0.01			
LFWPT-1	Diesel Firewater Tank 1	VOC	0.01	<0.01			
LFWPT-2	Diesel Firewater Tank 2	VOC	0.01	<0.01			
LFWPT-3	Diesel Firewater Tank 3	VOC	0.01	<0.01			
FUG-LIQ123	Fugitives Train 1 – Train 3 (6)	VOC	1.14	5.00	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
		VOC (9)	1.16	5.1	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
FUG-LIQ4	Fugitives Train 4 (6)	VOC	0.39	1.7	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
		VOC (9)	0.43	1.87	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
11K-30, 12K-30, 13K-30 14K-30 11K-31 12K-31 13K-31 14K-31 11K-32/11K-33 12K-32/12K-33 13K-32/13K-33 14K-32/14K-33	Propane Compressors Lube Oil Vent Propane Compressors Lube Oil Vent Propane Compressors Lube Oil Vent Propane Compressors Lube Oil Vent LP MR Compressors Lube Oil Vent MP/HP MR Compressor Lube Oil Vents MP/HP MR Compressor Lube Oil Vents MP/HP MR Compressor Lube Oil Vents MP/HP MR Compressor Lube Oil Vents	PM	0.03	0.11	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
		PM10	0.03	0.11			
		PM2.5	0.03	0.11			
		VOC	<0.01	<0.01			

Major NSR Summary Table							
Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
MSS-FUG1-3	Fugitives - Train 1 - Train 3 Vessel Opening for Maintenance	VOC	29.27	0.01	14, 15, 16, 17, 18, 21	14, 15, 16, 17, 18, 21, 24	14
MSS-FUG4	Fugitives - Train 4 Vessel Opening for Maintenance	VOC	29.27	0.01	14, 15, 16, 17, 18, 21	14, 15, 16, 17, 18, 21, 24	14
ALL	All EPNs at the site	Individual HAP	--	<10	--	--	--
		Total HAPs	--	<25			

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

(2) Specific point source name. For fugitive sources, use area name or fugitive source name.

(3) VOC - volatile organic compounds as defined in Title 29 Texas Administrative Code § 101.1

NO_x - total oxides of nitrogen

SO₂ - sulfur dioxide

PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented

PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented

PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter

CO - carbon monoxide

H₂SO₄ - sulfuric acid mist

H₂S - hydrogen sulfide

NH₃ - ammonia

(4) Planned startup and shutdown (SS) lbs/hour emissions for all pollutants are authorized even if not specifically identified as SS.

(5) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period. Annual emission rates for each source include planned SS emissions.

(6) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

(7) Only one Flare operating scenario is authorized at a time.

(8) Sulfuric acid mist is a subset of PM_{2.5} emissions.

(9) Limit after the flare gas recovery has been installed.

From: Thong Man <TMan@FreeportLNG.com>
Sent: Monday, November 17, 2025 9:35 AM
To: Kyle Murray
Cc: Michael Stephenson; Scott Brooks; Deborah Walden-Hersh; Sophia Gray
Subject: RE: [EXTERNAL]: Technical Review -- FOP O2878/Project 39287, Freeport LNG Development, L.P. - Freeport LNG Regas Facility and Liquefaction Plant

Good morning Kyle,

Thank you for the introduction email. We look forward to working with you on these projects. Please feel free to let us know if you have any questions.

Thank you,

Thong Man P.E.
Regulatory Compliance Engineer
LQF – 1500 Lamar Street, Quintana, Texas 77541
Office: 979-230-4820
Cell: 469-450-9073



From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Friday, November 14, 2025 1:55 PM
To: Thong Man <TMan@FreeportLNG.com>
Subject: [EXTERNAL]: Technical Review -- FOP O2878/Project 39287, Freeport LNG Development, L.P. - Freeport LNG Regas Facility and Liquefaction Plant

Good afternoon Mr. Man,

I have been assigned to the Federal Operating Permit (FOP) significant revision application of Permit No. O2878 for Freeport LNG Development, L.P. - Freeport LNG Regas Facility and Liquefaction Plant. This application has been assigned Project No. 39287. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking. Please confirm receipt of this email and CC all pertinent individuals.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

- a. NSR permit and PBR monitoring sufficiency – please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.

- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High level terms in the SOP Applicable Requirement Summary Table. The high-level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).

Please review the “SOP Technical Review Fact Sheet” located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf. This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

This is a generic email template sent at the beginning of each of my reviews and nothing is required from you at this time. This project has been expedited, and I will do my best to fast-track the application process.

Sincerely,

Kyle J. Murray

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC 163, P.O. Box 13087

Austin, TX 78711-3087

kyle.murray@tceq.texas.gov

Phone: (512) 239-1279

Fax: (512) 239-1400



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

Steven Piper

From: eNotice TCEQ
Sent: Tuesday, November 4, 2025 2:56 PM
To: joan.huffman@senate.texas.gov; cody.vasut@house.texas.gov
Subject: TCEQ Notice - Permit Number O2878
Attachments: TCEQ Notice - O2878_39287.pdf

This email is being sent to electronically transmit an official document issued by the Office of Air of the Texas Commission on Environmental Quality.

This email is being sent to you because either (a) you filed a document with the Office of the Chief Clerk that made you part of the official mailing list for the above referenced matter, or (b) notice to you is legally required. As authorized by Texas Water Code 5.128, this electronic transmittal is replacing the previous practice of hard copy distribution. Amendments to Texas Government Code 552.137 prompted a change to the agency's privacy policy regarding confidentiality of certain email addresses. The revised privacy policy can be viewed at http://www.tceq.state.tx.us/help/policies/electronic_info_policy.html.

Questions regarding this email may be submitted either by replying directly to this email or by calling Mr. Rhyan Stone with the Air Permits Division at (512) 239-1293.

The attached document is provided in an Adobe Acrobat .pdf format. If you cannot display the attachment, you may need to visit the Adobe web site (<http://get.adobe.com/reader>) to download the free Adobe Acrobat Reader software.

Brooke T. Paup, *Chairwoman*
Catarina R. Gonzales, *Commissioner*
Tonya R. Miller, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 4, 2025

THE HONORABLE JOAN HUFFMAN
TEXAS SENATE
PO BOX 12068
AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Significant Revision Application
Project Number: 39287
Permit Number: O2878
Freeport LNG Development, L.P.
Freeport Lng Regas Facility And Liquefaction Plant
Quintana, Brazoria County
Regulated Entity Number: RN103196689
Customer Reference Number: CN601720345

Dear Senator Huffman:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) significant revision application for a site located in your district. This application is being processed in an expedited manner, as allowed by the commission's rules in 30 Texas Administrative Code, Chapter 101, Subchapter J. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-95.3175,28.926944&level=13>.

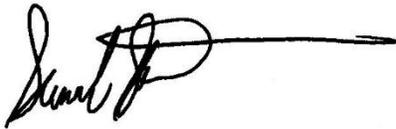
The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment at the site. The FOP identifies and codifies air emission requirements (known as applicable requirements) that apply to the emission units at the site. The FOP does not authorize construction of emission units or emissions from those units. The New Source Review (NSR) permit is the mechanism for these authorizations.

The Honorable Joan Huffman
Page 2
November 4, 2025

Re: Accepted Federal Operating Permit Significant Revision Application

This letter is being sent to you for information only and no action is required. If you need further information, please contact me at (512) 239-1250.

Sincerely,

A handwritten signature in black ink, appearing to read "Samuel Short", followed by a long horizontal line extending to the right.

Samuel Short, Deputy Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

Brooke T. Paup, *Chairwoman*
Catarina R. Gonzales, *Commissioner*
Tonya R. Miller, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 4, 2025

THE HONORABLE CODY VASUT
TEXAS HOUSE OF REPRESENTATIVES
PO BOX 2910
AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Significant Revision Application
Project Number: 39287
Permit Number: O2878
Freeport LNG Development, L.P.
Freeport Lng Regas Facility And Liquefaction Plant
Quintana, Brazoria County
Regulated Entity Number: RN103196689
Customer Reference Number: CN601720345

Dear Representative Vasut:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) significant revision application for a site located in your district. This application is being processed in an expedited manner, as allowed by the commission's rules in 30 Texas Administrative Code, Chapter 101, Subchapter J. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-95.3175,28.926944&level=13>.

The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment at the site.

This letter is being sent to you for information only and no action is required. If you need further information, please contact me at (512) 239-1250.

Sincerely,

A handwritten signature in black ink, appearing to read "Samuel Short", with a long horizontal line extending to the right.

Samuel Short, Deputy Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

Texas Commission on Environmental Quality

Title V Existing

2878

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	FREERTPORT LNG REGAS FACILITY AND LIQUEFACTION PLANT
Does the site have a physical address?	Yes
Physical Address	
Number and Street	1500 LAMAR ST
City	QUINTANA
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.926944
Longitude (W) (-###.#####)	95.3175
Primary SIC Code	4925
Secondary SIC Code	
Primary NAICS Code	221210
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN103196689
What is the name of the Regulated Entity (RE)?	FREERTPORT LNG LIQUEFACTION PLANT
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	Corner of Lamar and Cortez Streets
City	QUINTANA
State	TX
ZIP	77541
County	BRAZORIA
Latitude (N) (##.#####)	28.926944
Longitude (W) (-###.#####)	-95.3175
Facility NAICS Code	
What is the primary business of this entity?	LIQUIFIED NATURAL GAS LNG

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN601720345
Type of Customer	Partnership
Full legal name of the applicant:	
Legal Name	Freeport LNG Development, L.P.
Texas SOS Filing Number	800125153
Federal Tax ID	
State Franchise Tax ID	12700304111
State Sales Tax ID	

Local Tax ID	
DUNS Number	
Number of Employees	21-100
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	FREEPORT LNG DEVELOPMENT LP
Prefix	MR
First	MICHAEL
Middle	
Last	MOPPERT
Suffix	
Credentials	
Title	CHIEF OPERATING OFFICER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	1500 LAMAR ST
Routing (such as Mail Code, Dept., or Attn:)	
City	QUINTANA
State	TX
ZIP	77541
Phone (###-###-####)	7134158744
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	MMoppert@freeporlng.com

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

Organization Name	MICHAEL STEPHENSON(FREEPORT LNG DE...)
Prefix	FREEPORT LNG DEVELOPMENT LP
First	MR
Middle	MICHAEL
Last	STEPHENSON
Suffix	
Credentials	
Title	DIRECTOR OF REGULATORY AFFAIRS
Enter new address or copy one from list	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	1500 LAMAR ST

Routing (such as Mail Code, Dept., or Attn:)	
City	QUINTANA
State	TX
Zip	77541
Phone (###-###-####)	9794158728
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	mstephenson@freeporlng.com

Technical Contact

Person TCEQ should contact for questions about this application:	
Select existing TC contact or enter a new contact.	THONG MAN(FREEPORT LNG DE...)
Organization Name	FREEPORT LNG DEVELOPMENT LP
Prefix	MR
First	THONG
Middle	
Last	MAN
Suffix	PE
Credentials	
Title	REGULATORY COMPLIANCE ENGINEER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	1500 LAMAR ST
Routing (such as Mail Code, Dept., or Attn:)	
City	QUINTANA
State	TX
ZIP	77541
Phone (###-###-####)	9792304820
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	tman@freeporlng.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	28 Deg 55 Min 37 Sec
3) Permit Longitude Coordinate:	95 Deg 19 Min 3 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	Significant Revision
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No

4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) Who will electronically sign this Title V application?	Duly Authorized Representative
6) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	N/A

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

Attach OP-2 (Application for Permit Revision/Renewal)

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBR SUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name

Final LQF TV Significant Revision (2025-1103).pdf

Hash

F5848E670A8995B75261D31451DC285391A25DF0F165A9251DF210431CCA47A2

MIME-Type

application/pdf

An additional space to attach any other necessary information needed to complete the permit.

Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155, does the applicant want to expedite the processing of this application?	Yes
1.1. Can the applicant demonstrate that the purpose of this application will benefit the	Yes

economy of this state or an area of this state?

1.2. Select the applicable expedited surcharge.

\$10,000

Certification

I certify that I am the Duly Authorized Representative for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

1. I am Michael W Stephenson, the owner of the STEERS account ER029146.
2. I have the authority to sign this data on behalf of the applicant named above.
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 state and/or 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 signing Title V Existing 2878.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Michael W Stephenson OWNER OPERATOR

Account Number:	ER029146
Signature IP Address:	163.116.137.206
Signature Date:	2025-11-04
Signature Hash:	D90074A386FF35E1EF533EEC55540921C926101CA23462BE3A2B4EA86E4E65BB
Form Hash Code at time of Signature:	2C7E129ABF5957F5C854DF366BCCA027EA282D7E9BA447EFBA4854F15BEEAD90

Fee Payment

Transaction by:	The expedited fee payment transaction was made by ER029146/Michael W Stephenson
Paid by:	The expedited fee was paid by DEBORAH WALDEN-HERSH
Fee Amount:	\$10000.00
Paid Date:	The expedited fee was paid on 2025-11-04
Transaction/Voucher number:	The transaction number is 582EA000693150 and the voucher number is 791881

Submission

Reference Number:	The application reference number is 831246
Submitted by:	The application was submitted by ER029146/Michael W Stephenson
Submitted Timestamp:	The application was submitted on 2025-11-04 at 13:28:24 CST
Submitted From:	The application was submitted from IP address 163.116.137.206
Confirmation Number:	The confirmation number is 690251
Steers Version:	The STEERS version is 6.93
Permit Number:	The permit number is 2878

Additional Information

Application Creator: This account was created by Ishita Mathur

TITLE V SIGNIFICANT REVISION
Permit 02878



**Freeport LNG Development, L.P./
Liquefaction Plant and Regas Terminal**

Prepared By:

Deborah Walden-Hersh, P.E. – Principal Consultant
Sophia Gray, E.I.T – Consultant
Ishita Mathur – Consultant
Jeremy Harrison – Consultant

TRINITY CONSULTANTS

9737 Great Hills Trail
Suite 340
Austin, TX 78759
(512) 349-5800

November 2025

Project 254404.0012



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1. EXECUTIVE SUMMARY

Freeport LNG Development, L.P. (Freeport LNG) owns and operates a Liquefied Natural Gas (LNG) Liquefaction Plant and regasification terminal (Regas Terminal), located on Quintana Island near Freeport, Texas. Freeport LNG has been assigned Texas Commission on Environmental Quality (TCEQ) Customer Number (CN) 601720345. The Liquefaction Plant and Regas Terminal have been assigned TCEQ Air Quality Account No. BL-A014-N and Regulated Entity Number (RN) 103196689 and are currently permitted under New Source Review (NSR) Permits No. 55464 and 100114, various Permit by Rules (PBRs), and Title V Permit No. O2878.

The Liquefaction Plant and Regas Terminal are located in Brazoria County, which is currently classified as a "severe" nonattainment area for the 2008 8-hr ozone standard, "serious" nonattainment for the 2015 8-hour ozone standard, and attainment or unclassified for all other pollutants.¹

Freeport LNG received a draft permit for the approval of an amendment to NSR Permit No. 100114 and initial issuance of Nonattainment New Source Review (NNSR) Permit N304, which authorizes "as-built" changes and a flare gas recovery project at the Liquefaction Plant. Since the changes being authorized are retrospective, Freeport LNG is submitting this application for a significant revision to the existing Title V Permit No. O2878 for the inclusion of the NSR amendment prior to the issuance of the NSR permit and requests expedited review of this Title V application so that the Title V permit may be issued expeditiously after the issuance of the NSR permit.

1.1 Changes at the Site

The following changes have been authorized at LQF as part of the NSR Permit Amendment.

"As-built" changes:

- ▶ Additional streams controlled by the flare (Emission Point Number [EPN] LIQFLARE) are being added, including those associated with valve and analyzer gas venting and proposed maintenance, start-up, and shutdown (MSS) events;
- ▶ Adjustment to fugitive emissions resulting from ground truthing of component counts (EPNs FUG-LIQ123 and FUG-LIQ4);
- ▶ Addition of vessel opening emissions from maintenance activities (EPN MSS-FUG1-3 and MSS-FUG4);
- ▶ Updates to representations presented in previous permit applications.

Flare gas recovery project changes:

- ▶ Flare gas recovery project, which will reduce valve and analyzer gas vented to the flare; and
- ▶ Increased fugitive components associated with this project.

Of these changes, none result in a change to equipment, controls, or rule applicability for any emission sources in the Title V permit and there are no new emission sources required to be added to the permit. In addition, no new emission units are subject to Compliance Assurance Monitoring (CAM). Therefore, the revision is being made only to update the Major NSR Summary Table, NSR and NNSR permit references throughout the Title V permit.

¹ https://www3.epa.gov/airquality/greenbook/anayo_tx.html, last accessed June 2025.

1.2 Revision Application Contents

The enclosed Title V revision application for Freeport LNG consists of the following forms along with supplemental information.

- ▶ Section 2: Process Description
- ▶ Section 3: TCEQ Form OP-2
- ▶ Section 4: TCEQ Form OP-REQ1
- ▶ Section 5: Major NSR Summary Table

2. PROCESS DESCRIPTION

This section includes a process description of the operations on LQF sources. A process flow diagram is included at the end of this section.

2.1 Liquefaction Process Description

The liquefaction process is based on the Air Products and Chemicals, Inc. (APCI) propane, precooled, mixed component refrigerant process. The APCI process uses two types of refrigeration cycles to precool and liquefy the natural gas feed. The natural gas feed is first precooled using propane refrigerant at four different descending pressure levels and their corresponding lower vaporization temperatures.

To convert the treated feed gas into LNG, the gas is first precooled with propane refrigerant, after which it is sent to the main cryogenic heat exchanger (MCHE). At the MCHE, it is further cooled inside heat exchanger tubes by a lower temperature, mixed refrigerant flowing outside the tubes. As the feed gas flows up the tubes, it starts condensing by transferring heat to the liquid /vapor mixed refrigerant, which warms up and vaporizes as it flows down the outside of the tubes. Upon exiting the MCHE, the heated mixed refrigerant is then cooled by ambient air, compressed, and subsequently chilled by propane refrigerant in heat exchangers, where a portion of the refrigerant condenses.

After separating the vapor and liquid streams of mixed refrigerant, both streams are introduced into the MCHE tube bundles where they are further cooled by the mixed refrigerant. Then the liquefied mixed refrigerant streams exit the MCHE and are depressurized and admitted to the MCHE to provide cooling for the conversion of methane rich gas into LNG. The liquid mixed refrigerant stream is depressurized through a hydraulic turbine to increase the overall process efficiency. The high-pressure LNG exiting the MCHE is depressurized through a hydraulic turbine (expander) and delivered to any of the existing, authorized LNG storage tanks (i.e., Tanks 1, 2, and/or 3).

2.2 Regas Terminal

The Regas Terminal consists of two sections. The first includes the LNG exporting facility, two docking facilities), and associated piping and equipment. The second section consists of LNG storage and vaporization facilities, which include three LNG storage tanks, emissions control equipment, vaporization units, and associated piping.

LNG produced in Trains 1-4 is loaded into vessels for transport. When gas conditioning a ship to accept LNG produced in Trains 1-4, the gas stream from the vessel is directed to the boil-off gas system (BOG) or is controlled by a flare (EPN FLR).

During routine operation of the terminal facilities, stored LNG vapor is continually boiling off as thermal energy penetrates the storage tanks, vaporization units, and associated piping and equipment. Basically, ambient heat warms up a portion of the LNG and causes it to evaporate. The vaporizing LNG increases storage tank pressure until a point is reached where the LNG vapor must be transferred elsewhere; either vented to the flare or to the atmosphere, or it may be captured and reliquefied. Under the existing terminal operation, BOG may be compressed and enters the terminal's send-out transmission pipeline for domestic delivery.

3. TCEQ FORM OP-2

**Federal Operating Permit Program
 Application for Permit Revision/Renewal
 Form OP-2-Table 1
 Texas Commission on Environmental Quality**

Date: 11/03/2025	
Permit No.: O2878	
Regulated Entity No.: RN103196689	
Company Name: Freeport LNG Development, L.P.	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
I. Application Type	
Indicate the type of application:	
<input type="checkbox"/> Renewal	
<input type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input checked="" type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
For GOP Revisions Only	<input type="checkbox"/> YES <input type="checkbox"/> NO

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1 (continued)
Texas Commission on Environmental Quality**

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)							
Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>							
<input checked="" type="checkbox"/> VOC	<input checked="" type="checkbox"/> NO _x	<input type="checkbox"/> SO ₂	<input type="checkbox"/> PM ₁₀	<input checked="" type="checkbox"/> CO	<input type="checkbox"/> Pb	<input type="checkbox"/> HAP	
Other:							
IV. Reference Only Requirements (For reference only)							
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?					<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
V. Delinquent Fees and Penalties							
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.							

**Federal Operating Permit Program
 Application for Permit Revision/Renewal
 Form OP-2-Table 2
 Texas Commission on Environmental Quality**

Date: 11/03/2025
Permit No.: O2878
Regulated Entity No.: RN103196689
Company Name: Freeport LNG Development, L.P.

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
1	SIG-E	NO		OP-REQ1	100114	Updating NSR Permit No. 100114 and EPA Permit N304 issuance date.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 3
Texas Commission on Environmental Quality**

Date: 11/03/2025	
Permit No.: O2878	
Regulated Entity No.: RN103196689	
Company Name: Freeport LNG Development, L.P.	
I. Significant Revision <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>	
A. Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B. Indicate the alternate language(s) in which public notice is required: Spanish	
C. Will, there be a change in air pollutant emissions as a result of the significant revision?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

**Federal Operating Permit Program
 Application for Permit Revision/Renewal
 Form OP-2-Table 3
 Texas Commission on Environmental Quality**

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

Pollutant	Description of the Change in Pollutant Emissions
Volatile organic compounds	Increase in pollutant emissions as a result of the significant revision.
Nitrogen oxides	Increase in pollutant emissions as a result of the significant revision.
Sulfur dioxide	Increase in pollutant emissions as a result of the significant revision.
Carbon monoxide	Increase in pollutant emissions as a result of the significant revision.

4. TCEQ FORM OP-REQ1

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 88)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
11/03/2025	O2878	RN103196689

For SOP applications, answer ALL questions unless otherwise directed.

◆ For GOP applications, answer ONLY these questions unless otherwise directed.

XII. NSR Authorizations (Attach additional sheets if necessary for sections XII.E-J.)

E. PSD Permits and PSD Major Pollutants

Permit No.	Issuance Date	Pollutant(s):	Permit No.	Issuance Date	Pollutant(s):

If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.

F. Nonattainment (NA) Permits and NA Major Pollutants

Permit No.	Issuance Date	Pollutant(s):	Permit No.	Issuance Date	Pollutant(s):
N304	TBD	NO _x , VOC			

If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.

G. NSR Authorizations with FCAA § 112(g) Requirements

NSR Permit No.	Issuance Date	NSR Permit No.	Issuance Date	NSR Permit No	Issuance Date

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 89)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
11/03/2025	O2878	RN103196689

For SOP applications, answer ALL questions unless otherwise directed.

- ◆ For GOP applications, answer ONLY these questions unless otherwise directed.

XII. NSR Authorizations (continued) - (Attach additional sheets if necessary for sections XII.E-J.)

- ◆ **H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area**

Authorization No.	Issuance Date	Authorization No.	Issuance Date	Authorization No.	Issuance Date
55464	10/06/2025				
100114	TBD				

- ◆ **I. Permits by Rule (30 TAC Chapter 106) for the Application Area**

A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.

PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date
106.122	09/04/2000	106.472	09/04/2000		
106.227	09/04/2000	106.473	09/04/2000		
106.263	11/01/2001	106.476	09/04/2000		
106.265	09/04/2000	106.492	09/04/2000		
106.355	11/01/2001	106.511	09/04/2000		
106.412	09/04/2000	106.532	09/04/2000		
106.433	09/04/2000				
106.452	09/04/2000				

- ◆ **J. Municipal Solid Waste and Industrial Hazardous Waste Permits with an Air Addendum**

Permit No.	Issuance Date	Permit No.	Issuance Date	Permit No.	Issuance Date

5. MAJOR NSR SUMMARY TABLE

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
LIQFLARE	Liquefaction Flare (Before construction of flare gas recovery and Train 4) (7)	NOx	80.1	47.43	5, 6, 7, 8, 14, 15, 17, 18, 19, 20	5, 8, 14, 15, 17, 18, 24	5, 8
		NOx (MSS)	6674.08				
		CO	318.99	188.91			
		CO (MSS)	26580.25				
		SO2	0.71	0.34			
		SO2 (MSS)	13.38				
		VOC	6.26	19.55			
VOC (MSS)	3539						
LIQFLARE	Liquefaction Flare (Before construction of Train 4 and after construction of flare gas recovery) (7)	NOx	40.16	40.19	5, 6, 7, 8, 14, 15, 17, 18, 19, 20	5, 8, 14, 15, 17, 18, 24	5, 8
		NOx (MSS)	6634.15				
		CO	159.95	160.07			
		CO (MSS)	26421.21				
		SO2	0.36	0.21			
		SO2 (MSS)	13.03				
		VOC	3.15	18.41			
VOC (MSS)	3536						
LIQFLARE	Liquefaction Flare (After construction of Train 4 and flare gas recovery) (7)	NOx	53.47	42.61	5, 6, 7, 8, 14, 15, 17, 18, 19, 20	5, 8, 14, 15, 17, 18, 24	5, 8
		NOx (MSS)	6647.46				
		CO	212.96	169.68			
		CO (MSS)	26474.23				
		SO2	0.47	0.25			
		SO2 (MSS)	13.15				
		VOC	4.19	18.79			
VOC (MSS)	3536.71						
LIQFWP-1	Fire Water Pump 1	NOx	3.25	0.16	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.85	0.04			
		PM	0.10	<0.01			
		PM10	0.10	<0.01			
		PM2.5	0.10	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
VOC	0.11	0.01					

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
LIQFWP-2	Fire Water Pump 2	NOx	3.3	0.16	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.85	0.04			
		PM	0.10	<0.01			
		PM10	0.10	<0.01			
		PM2.5	0.10	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0	0.01			
LIQFWP-3	Fire Water Pump 3	NOx	3.25	0.16	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.85	0.04			
		PM	0.1	<0.01			
		PM10	0.1	<0.01			
		PM2.5	0.1	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.11	0.0			
LIQEG-1	Emergency Generator 1 (DQFAH)	NOx	1.38	0.03	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2.00	0.05			
		PM	0.05	<0.01			
		PM10	0.05	<0.01			
		PM2.5	0.05	<0.01			
		SO2	0.02	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.13	<0.01			
NH3	0.51	0.01					

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
LIQEG-2	Emergency Generator 2 (DQFAH)	NOx	1.38	0.03	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2.00	0.05			
		PM	0.05	<0.01			
		PM10	0.05	<0.01			
		PM2.5	0.05	<0.01			
		SO2	0.02	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.13	<0.01			
		NH3	0.51	0.01			
LIQEG-3	Emergency Generator 3 (DQFAH)	NOx	1.38	0.03	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2.00	0.05			
		PM	0.05	<0.01			
		PM10	0.05	<0.01			
		PM2.5	0.05	<0.01			
		SO2	0.02	<0.01			
		H2SO4	<0.01	<0.01			
		VOC	0.13	<0.01			
		NH3	0.51	0.01			
LIQEG-4	Emergency Generator 4 (DQFAH)	NOx	1.38	0.0	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2	0.05			
		PM	0.05	<0.01			
		PM10	0.05	<0.01			
		PM2.5	0.05	<0.01			
		SO2	0.02	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.13	<0.01			
		NH3	0.51	0.01			
LIQEG-5	Emergency Generator - Guard House/Admin Area (DQDAA)	NOx	3.50	0.09	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.79	0.02			
		PM	0.04	<0.01			
		PM10	0.04	<0.01			
		PM2.5	0.04	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.05	<0.01			

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
LIQEG-6	Emergency Generator – Dock 2 (DSGAD)	NOx	2.64	0.07	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	0.18	<0.01			
		PM	0.02	<0.01			
		PM10	0.02	<0.01			
		PM2.5	0.02	<0.01			
		SO2	<0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.02	<0.01			
LIQEG-7	Train 4 - Emergency Generator 4 (DQFAH)	NOx	1.38	0.03	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	2.00	0.05			
		PM	0.05	<0.01			
		PM10	0.05	<0.01			
		PM2.5	0.05	<0.01			
		SO2	0.02	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.13	<0.01			
NH3	0.51	0.01					
LIQEAC-1	Emergency Air Compressor (QSX15)	NOx	1.87	0.05	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	1.73	0.04			
		PM	0.10	<0.01			
		PM10	0.10	<0.01			
		PM2.5	0.10	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.10	<0.01			
NH3	0.06	<0.01					
LIQEAC-2	Train 4 - Emergency Air Compressor (QSX15)	NOx	1.87	0.05	3, 4, 9	3, 4, 9, 24	3, 4, 9
		CO	1.73	0.04			
		PM	0	<0.01			
		PM10	0	<0.01			
		PM2.5	0	<0.01			
		SO2	0.01	<0.01			
		H2SO4 (8)	<0.01	<0.01			
		VOC	0.10	<0.01			
NH3	0.06	<0.01					

Major NSR Summary Table

Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
LEGT-1	Emergency Generator Tank 1	VOC	0.01	<0.01			
LEGT-2	Emergency Generator Tank 2	VOC	0.01	<0.01			
LEGT-3	Emergency Generator Tank 3	VOC	0.01	<0.01			
LEGT-4	Emergency Generator Tank 4	VOC	0.01	<0.01			
LEGT-5	Emergency Generator Tank 5	VOC	0.01	<0.01			
LEGT-6	Emergency Generator Tank 6	VOC	0.01	<0.01			
LEGT-7	Emergency Generator Tank 7 – Train 4	VOC	0.01	<0.01			
LEACT-1	Backup Air Compressor Tank 1	VOC	0.01	<0.01			
LEACT-2	Backup Air Compressor Tank 2 - Train 4	VOC	0.01	<0.01			
LFWPT-1	Diesel Firewater Tank 1	VOC	0.01	<0.01			
LFWPT-2	Diesel Firewater Tank 2	VOC	0.01	<0.01			
LFWPT-3	Diesel Firewater Tank 3	VOC	0.01	<0.01			
FUG-LIQ123	Fugitives Train 1 – Train 3 (6)	VOC	1.14	5.00	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
		VOC (9)	1.16	5.1	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
FUG-LIQ4	Fugitives Train 4 (6)	VOC	0.39	1.7	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
		VOC (9)	0.43	1.87	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17
11K-30, 12K-30, 13K-30, 14K-30 11K-31 12K-31 13K-31 14K-31 11K-32/11K-33 12K-32/12K-33 13K-32/13K-33 14K-32/14K-33	Propane Compressors Lube Oil Vent Propane Compressors Lube Oil Vent Propane Compressors Lube Oil Vent Propane Compressors Lube Oil Vent LP MR Compressors Lube Oil Vent MP/HP MR Compressor Lube Oil Vents MP/HP MR Compressor Lube Oil Vents MP/HP MR Compressor Lube Oil Vents MP/HP MR Compressor Lube Oil Vents	PM PM10 PM2.5 VOC	0.03 0.03 0.03 <0.01	0.11 0.11 0.11 <0.01	10, 11, 12, 13, 17	10, 13, 17, 24	10, 17

Major NSR Summary Table							
Permit Numbers: 100114 and N304					Issuance Date: TBD		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (4)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (5)	Special Condition/ Application Information	Special Condition/ Application Information	Special Condition/ Application Information
MSS-FUG1-3	Fugitives - Train 1 - Train 3 Vessel Opening for Maintenance	VOC	29.27	0.01	14, 15, 16, 17, 18, 21	14, 15, 16, 17, 18, 21, 24	14
MSS-FUG4	Fugitives - Train 4 Vessel Opening for Maintenance	VOC	29.27	0.01	14, 15, 16, 17, 18, 21	14, 15, 16, 17, 18, 21, 24	14
ALL	All EPNs at the site	Individual HAP	--	<10	--	--	--
		Total HAPs	--	<25			

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

(2) Specific point source name. For fugitive sources, use area name or fugitive source name.

(3) VOC - volatile organic compounds as defined in Title 29 Texas Administrative Code § 101.1

NO_x - total oxides of nitrogen

SO₂ - sulfur dioxide

PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented

PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented

PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter

CO - carbon monoxide

H₂SO₄ - sulfuric acid mist

H₂S - hydrogen sulfide

NH₃ - ammonia

(4) Planned startup and shutdown (SS) lbs/hour emissions for all pollutants are authorized even if not specifically identified as SS.

(5) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period. Annual emission rates for each source include planned SS emissions.

(6) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

(7) Only one Flare operating scenario is authorized at a time.

(8) Sulfuric acid mist is a subset of PM_{2.5} emissions.

(9) Limit after the flare gas recovery has been installed.