

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Tuesday, July 6, 2021 10:02 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

PM
H

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Friday, July 2, 2021 4:08 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Lisa Averill <Lisa.Averill.411620141@p2a.co>
Sent: Friday, July 2, 2021 3:40 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Lisa Averill
6142 Brockhampton St
Corpus Christi, TX 78414

From: PUBCOMMENT-OCC
To: PUBCOMMENT-APD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)
Date: Wednesday, June 16, 2021 1:44:32 PM

PM

H

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Tuesday, June 15, 2021 5:28 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Alvin Baker <Alvin.Baker.410524022@p2a.co>
Sent: Tuesday, June 15, 2021 3:27 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Alvin Baker
124 Walker Ave
Portland, TX 78374 |

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Tuesday, June 29, 2021 3:03 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

PM
H

NSR
123404

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Monday, June 28, 2021 8:27 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Eddie Canales <Eddie.Canales.342218118@p2a.co>
Sent: Friday, June 25, 2021 11:00 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Eddie Canales
7021 Bevington Dr
Corpus Christi, TX 78413 .

From: PUBCOMMENT-OCC
To: PUBCOMMENT-APD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)
Date: Monday, June 14, 2021 8:00:45 AM

PM
H

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Monday, June 14, 2021 7:59 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Teresa Carrillo <Teresa.Carrillo.459540373@p2a.co>
Sent: Sunday, June 13, 2021 7:51 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

You may not be aware, but almost 20 years ago when Cheniere first began their local campaign to gain support for their plant they bragged about how safe and undistruptive the plant would be. Because in the early 2000's Cheniere proposed a natural gas IMPORT plant, not an EXPORT plant. This complete shift in paradigm has not been examined closely enough!!!

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Teresa A Carrillo
730 Harrison St.
Corpus Christi, Texas.78404

Regards,

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Monday, June 21, 2021 2:08 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: Public comment on Permit Number 105710
Attachments: CCL 105710 Comments FINAL c.pdf

PM
H

NSR
123404

From: colincox@environmentalintegrity.org <colincox@environmentalintegrity.org>
Sent: Thursday, June 17, 2021 12:48 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 105710

REGULATED ENTY NAME CORPUS CHRISTI LIQUEFACTION

RN NUMBER: RN104104716

PERMIT NUMBER: 105710

DOCKET NUMBER:

COUNTY: SAN PATRICIO

PRINCIPAL NAME: CORPUS CHRISTI LIQUEFACTION LLC

CN NUMBER: CN604136374

FROM

NAME: Colin Cox

E-MAIL: colincox@environmentalintegrity.org

COMPANY: Environmental Integrity Project

ADDRESS: 1405 GARNER AVE
AUSTIN TX 78704-2846

PHONE: 8323160580

FAX:

COMMENTS: These comments correct an error in our earlier comments, which incorrectly identified a member of Portland Citizens United.



1206 San Antonio St.
Austin, Texas 78701
Phone: 832-316-0580
www.environmentalintegrity.org

June 14, 2021

Ms. Laurie Gharis
Chief Clerk, MC-105
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Via Electronic Filing

**Re: Comments, Public Meeting Request, and Contested Case Hearing
Request on the Application to Amend Air Quality Permit No. 105710 to
Increase Emissions at the Corpus Christi Liquefaction Terminal**

Dear Ms. Gharis,

Corpus Christi Liquefaction, LLC ("CCL"), a subsidiary of Cheniere Energy, Inc., has applied to the Texas Commission on Environmental Quality ("TCEQ") for an amendment to Air Quality Permit No. 105710 (the "Application") to authorize additional emissions of Nitrogen Oxides, Carbon Monoxide, Volatile Organic Compounds, and other pollutants from flares at its liquefied natural gas terminal (the "Terminal") in San Patricio and Nueces Counties, Texas.

Portland Citizens United, Sierra Club, Texas Campaign for the Environment, and Environmental Integrity Project (collectively, "Commenters") appreciate the opportunity to submit these comments on the Application. Commenters request a public meeting be held regarding the Application. Members of each group request the opportunity to discuss the Application with representatives from CCL and TCEQ.

I. Contested Case Hearing Request

Portland Citizens United and Sierra Club request a contested case hearing on this Application. Please direct all communication regarding this hearing request to Colin Cox, Staff Attorney at Environmental Integrity Project.

a. Information in support of Portland Citizens United's contested case hearing request.

Portland Citizens United is a grassroots community group of citizens who care deeply about their community and its values as a clean, family-oriented city, with good neighbors and an excellent school system. Portland Citizens United members have one overarching goal: protecting their homes, children, and quality of life. Portland Citizens United was originally formed in 2017 to resist the construction of a large ethane cracker in Portland. Since then, its mission has expanded to include educating Portland residents about industrial activity in the area, and opposing that activity when it threatens the health, safety and natural beauty of the Portland community. Portland Citizens United members live in close proximity to the Terminal and are harmed by CCL's air pollution and frequent flaring.

Encarnacion Serna is a member of Portland Citizens United and lives at 105 Lost Creek Drive, Portland, TX 78374. Mr. Serna lives with his wife less than two miles from the Terminal, and can see and hear the Terminal's flares from their property. He spends a considerable amount of time outdoors with his children and grandchildren, both on his property and boating and fishing in the bay. Mr. Serna is concerned by the near-constant flares burning at CCL and the pollution they release. When CCL's flares are exceedingly large, he and his wife go inside their home to avoid exposure to air pollution, which exacerbates their allergies. Mr. Serna is troubled with CCL's application to increase pollution from the flares. He is worried it may further inhibit his ability to spend time outdoors with his family.

Mindi and James Rosson are members of Portland Citizens United and live at 1110 Cupertino Street, Portland, TX 78374. The Rossons live with their young children, less than 1.5 miles from the Terminal. They can see and hear the Terminal's flares from their property, and understand that flaring means pollution is being released. Mr. and Mrs. Rosson are concerned that increased pollution from the Terminal will increase the risk of negative health effects for their family. They are worried that they will be exposed to air pollution from CCL while enjoying their backyard pool and waterslide, and that their children will be exposed to air pollution while they play in their backyard sandbox or on their swing set. The Rossons sometimes curtail their outdoor activities in response to text message alerts that CCL is flaring. They are worried that an increase in CCL's flaring will limit their enjoyment of the outdoors.

b. Information in support of Sierra Club's contested case hearing request.

Sierra Club, a California non-profit corporation with an office in Austin, is the nation's oldest conservation organization. The Sierra Club's state and local chapters include thousands of Texas members who are dedicated to exploring, enjoying, and protecting Texas' natural resources and wild places. Sierra Club promotes the responsible use of the Earth's ecosystem and resources, and works to restore the quality of the natural and human environment. In addition to organizing nature outings and public education campaigns, Sierra Club and its Texas members pursue advocacy and litigation on issues including clean air and clean water, solid waste reduction, and sustainable energy and land use policies. Sierra Club members live in close proximity to the Terminal and are harmed by CCL's air pollution and frequent flaring.

Wendy Hughes is a member of Sierra Club and Portland Citizens United, and lives at 2129 Bay Breeze Drive, Portland TX 78374. Mrs. Hughes lives with her husband and son less than 1.5 miles from the project site, and can see CCL's flares burning and sometimes smoking from her property. She is concerned about industrial air pollution and the effects it may have on her health, as well as her family's health. Mrs. Hughes enjoys walking her dog in the area and taking walks on the beach, but curtails these activities because she is concerned about her exposure to air pollution from the Terminal. She is worried that if CCL is allowed to increase its flaring, she will not be able to spend as much time outside, even on her own property. If local air quality continues to deteriorate she has contemplated selling her home and moving away from CCL.

Uneeda Laitinen is a member of Sierra Club and lives at 102 Markham Place, Portland, TX 78374. Mrs. Laitinen lives just over two miles from the Terminal, and can see the Terminal's flares from her property. Mrs. Laitinen is sensitive to air pollution because she suffers from multiple respiratory ailments, including asthma, emphysema, and chronic obstructive pulmonary disease. She uses two inhalers to aid in breathing on a daily basis and sometimes uses supplemental oxygen. She has observed a worsening of air quality and a corresponding worsening of her respiratory symptoms over the past several years as multiple large sources of air pollution have been built near her home, including CCL's Terminal. Mrs. Laitinen is concerned that increased pollution from CCL will further interfere with her use and enjoyment of her property. Specifically, she may have to limit gardening and spending time outside of her home if CCL is allowed to increase pollution from its flares.

II. The Application fails to demonstrate compliance with Best Available Control Technology requirements.

This application is deficient for its failure to analyze and apply Best Available Control Technology ("BACT") for the flares. The Clean Air Act requires that new and modified sources of air pollution install pollution control technology that is at least as effective as the best technology currently in use at similar plants around the country. Emission limits based on BACT must be achievable in practice and the permit must include a reliable method for determining compliance with that limit. CCL's flare BACT analysis is deficient because its proposed flare design, operating, and compliance assurance methods fail to incorporate elements—found in permits and regulations for comparable sources—necessary to assure ongoing compliance with the emission limits CCL proposes.

a. CCL's BACT analysis fails to consider enhanced flare operating, design, and monitoring requirements found in regulations, consent decrees, settlements, and permits for comparable sources.

CCL proposes to control volatile organic compounds and carbon monoxide emissions from the flares primarily by designing and operating all flares to meet the requirements of 40 CFR § 60.18 and by designing the Terminal to minimize flaring. CCL proposes to control nitrogen oxides emissions from the flares by designing the Terminal to minimize flaring. For volatile organic compounds, CCL assumes that these methods will ensure a destruction removal efficiency of 99% for compounds with three carbons or less and a destruction removal efficiency of 98% for compounds with four carbons or more.

However, as Environmental Protection Agency ("EPA") studies and rulemakings dating back nearly 10 years reveal, the general design and operating requirements proposed by CCL are insufficient to ensure that flares achieve the represented level of performance.¹ In a 2019 memorandum supporting EPA's National Emission Standards for Hazardous Air Pollutants ("NESHAP") for ethylene production, EPA explained that ethylene production facility flares complying only with the general NESHAP flare standards, which are similar to § 60.18 requirements,

¹ See, e.g., EPA Enforcement Targets Efficiency Violations (August 2012) (indicating that parameters affecting the efficiency of flares, like the steam-to-vent gas ratio and the heating value of the combustion zone gas are not captured by general standards, like § 60.18) available electronically at: <https://www.epa.gov/sites/production/files/documents/flaringviolations.pdf>; EPA Office of Air Quality Planning and Standards, Parameters for Properly Designed and Operated Flares at 3-32 (April 2012) (providing that reliance on general flare requirements, like § 60.18 "as an indicator of good combustion ignores any effect of steaming.") available electronically at: <https://www3.epa.gov/airtoxics/flare/2012flaretechreport.pdf>.

are not achieving the purported 98% destruction efficiency. Rather, EPA estimated that “the baseline level of control for all ethylene flares in the source category would fall on average somewhere between 86.6 percent and 94.2 percent”—or 90.4 percent, as “an average of these two numbers.”² In finalizing revised operational and monitoring requirements that would address these factors at ethylene production facilities, EPA estimated that the revised flare standards “have the potential to reduce excess emissions from flares by approximately 1,430 tpy of HAP and 13,020 tpy of VOC.”³

These studies strongly suggest that CCL’s application overestimates destruction removal efficiency. Currently, the permit assumes high destruction removal efficiency but lacks any requirements to verify that it is being achieved in practice.

CCL’s Application wrongly limits its analysis of control technologies to the RACT/BACT/LAER Clearinghouse. A broader search reveals that enhanced flare controls similar to those established by EPA’s Ethylene Production and Refinery NESHAPs have already been required by consent decrees, settlements, and air permits issued for petrochemical plants in Pennsylvania, Texas, and Louisiana. For example, Shell’s Pennsylvania Petrochemicals Complex, which consists of an ethylene cracker with a polyethylene derivatives unit, must comply with enhanced flare design and operating requirements found at 40 C.F.R. § 63.987(c) (monitoring of flame presence), § 63.671 (operation and maintenance of flare monitoring systems), and § 63.670(d)-(f), (i)-(n), (p) (establishing flare—tip velocity requirements, requirement to maintain specified net heating value of the combustion zone on a 15-minute block average basis, requirement to monitor flow rate of all gas stream that contribute to the flare vent gas and assist steam, requirement to monitor flare vent gas composition, and requirement to use specified calculation methods for velocity, flow rate, composition, and heating value).⁴

In 2018, EPA entered into a consent decree with ExxonMobil for serious Clean Air Act violations resulting from underperforming flares at eight of the company’s

² Memorandum from Andrew Bouchard to EPA, Docket No. EPA-HQ-OAR-2017-0357, Re: Control Option Impacts for Flares Located in the Ethylene Production Source Category (March, 2019) available electronically at: <https://www.regulations.gov/document?D=EPA-HQ-OAR-2017-0357-0017>.

³ National Emission Standards for Hazardous Air Pollutants, Generic Maximum Achievable Control Technology Standards Residual Risk and Technology Review for Ethylene Production, 84 Fed. Reg. 54,278, 54,301 (October 9, 2019).

⁴ Settlement Agreement Between Shell Chemical Appalachia LLC and Clean Air Council and Environmental Integrity Project (August, 2017) available electronically at: <https://environmentalintegrity.org/wpcontent/uploads/2017/02/2017.08.25-Shell-Settlement-Agreement.pdf>.

chemical and plastics manufacturing plants in Texas and Louisiana.⁵ Pursuant to this consent decree, ExxonMobil must install additional monitoring and control equipment that reflects requirements found in EPA's NESHAPs for refinery and ethylene production plants.⁶ These requirements have been incorporated into ExxonMobil's permits issued by the TCEQ.

CCL's BACT analysis must adopt flare design, operating, and monitoring requirements consistent with those found in the Shell settlement and the ExxonMobil Consent Decree. These requirements are necessary to assure that CCL's flare will actually achieve the assumed level of control on an ongoing basis. Specifically, 40 C.F.R. § 63.670(e) requires operation of flares to maintain a net heating value of the flare combustion zone gas (NHV^{cz}) at or above 270 British thermal units per standard cubic feet (Btu/scf) determined on a 15-minute block period basis when regulated material is routed to the flare for at least 15 minutes. In order to calculate and demonstrate compliance with combustion zone limits, CCL must install, operate, calibrate and maintain a monitoring system capable of continuously measuring, calculating and recording the volumetric flow rate of all gas streams that contribute to the flare vent gas as well as the volumetric flow rate of assist gas used with the flare. The concentration of individual components in the flare vent gas must also be measured at least once every 15 minutes, or alternatively the net heating value of the vent gas can be measured continuously.

For steam-assisted flares, the calculation of NHV^{cz} should combine supplemental information with the net heating value of the vent gas to provide additional context for meeting required combustion efficiencies. The equation for NHV^{cz} in 40 C.F.R. § 63.670(m)(1) includes the measurement of assist steam flow on a 15-minute block average to account for the overall impact on the heating value of the combustion zone, with an increase in steam flow resulting in a decrease in NHV^{cz}. EPA's 1983 Flare Efficiency Study shows that for steam-assisted flares, excessive steam-to-vent gas ratios can lead to steam quenching of the flame, resulting in notably lower combustion efficiency.⁷

Specifically, the study provides data showing that steam-to-vent gas ratios above 3.5 result in considerably lower combustion efficiencies. For example, a steam-to-vent gas ratio of 5.67 (pound to pound) resulted in a combustion efficiency of

⁵ Consent Decree, EPA v. ExxonMobil, Civil Action No. 4:17-cv-3302 ("ExxonMobil Consent Decree") (June 6, 2018) available electronically at: <https://www.epa.gov/sites/production/files/2018-06/documents/exxonmobilcorp-cd.pdf>.

⁶ ExxonMobil Consent Decree at Paragraphs 20-27, 39-43.

⁷ Flare Efficiency Study, EPA-600/2-83-052 (July, 1983) available electronically at: https://www3.epa.gov/ttn/chief/ap42/ch13/related/ref_01c13s05_jan1995.pdf

82.18%, while a steam-to-vent gas ratio of 6.86 resulted in a combustion efficiency of 68.95%. EPA cited this study in a Notice of Violation issued to the Wood River Refinery, presenting the impact of steam-to-vent gas ratios on flare combustion efficiency, and validating that "several recent studies have been conducted with the use of passive Fourier transform infrared spectroscopy that verify the conclusion reached in EPA 600/2-83-052." EPA's 1983 study, along with additional information presented in the more recent dockets for EPA's NESHAPs for refineries and ethylene production, demonstrate that CCL must monitor and manage flare assist steam or airflow rates on a continuous basis to continuously meet the represented destruction removal efficiency.

Commenters request that the Executive Director require CCL to comply with enhance flare design, monitoring, and operating requirements found in EPA's refinery and ethylene production NESHAPs and the above-cited settlement, consent decree, and permits.

b. CCL's application may overstate the flare's ability to control volatile organic compound emissions during certain operating conditions.

CCL's BACT analysis for its flares assumes the flares will have a destruction removal efficiency of 99% for compounds up to three carbons and 98% for compounds of four or more carbons, which matches the default controls within TCEQ's New Source Review Guidance for Flares and Vapor Combustors workbook.⁸ CCL uses this destruction removal efficiency to calculate emission limits representing the flare's potential to emit. While Commenters appreciate that the proposed level of volatile organic compound destruction removal efficiency and potential to emit reflect a high level of performance, we are concerned that the represented destruction removal efficiency may not be achievable in practice under certain operating conditions. A unit's represented potential to emit for permitting purposes must be a conservative value that is achievable in practice, and enforceable through reliable compliance determination methods.

Commenters are concerned because some manufacturers have been unwilling to guarantee the 99% destruction removal efficiency for three carbon compounds ("C3") when a flare is combusting a mixture of three and four (or greater) hydrocarbon compounds ("C4+"). Because monitoring methods proposed by CCL do not allow for a meaningful determination of the level of destruction removal efficiency actually

⁸ TCEQ, BACT Guidelines for Chemical Sources (March 19, 2019) available electronically at: https://www.tceq.texas.gov/permitting/air/nav/air_bact_chemsource.html.

achieved under different operating scenarios, it is when its flare is combusting a mixture of C3 and C4+ compounds. Unless CCL has obtained a vendor guarantee for 99% destruction removal efficiency of C3 compounds under such circumstances, the Executive Director should require the company to revise its application in one of two ways:

First, CCL could calculate its potential to emit conservatively using a 98% destruction removal efficiency across all scenarios, including for C3 and below. Calculating potential to emit in this way would decrease the likelihood that the application understates actual emissions from the flare. Or, if CCL has a guarantee for 99% destruction removal efficiency when only C3 compounds are being combusted, CCL could calculate the flare's potential to emit based on the 99% destruction removal efficiency when only C3 compounds are being combusted and a 98% destruction removal efficiency when C4+ compounds or a mixture of C3 and C4+ compounds are combusted.

Commenters request that the Executive Director require CCL to provide updated application representations, including vendor guarantee terms, showing that its potential to emit estimates are reasonable and achievable in practice.

III. Disputed Issues of Fact

In addition to the issues detailed above, Commenters provide the following list of disputed issues that are relevant and material to the Commission's decision on this application, for consideration as part of the requested contested case hearing:

- Whether the proposed emissions will threaten the health and safety of nearby residents.
- Whether the proposed emissions will cause or contribute to exceedances of National Ambient Air Quality Standards.
- Whether the proposed emissions will exceed allowable Prevention of Significant Deterioration Increments.
- Whether the proposed emissions will cause nuisance conditions violating 30 Tex. Admin. Code § 101.4.
- Whether the TCEQ considered cumulative risks of nearby sources of air pollution.

- Whether Draft Permit conditions are adequate to protect the public from cumulative risks in accordance with Tex. Water Code § 5.130.
- Whether the Applicant's air quality analysis is flawed.
- Whether the modified sources will utilize Best Available Control Technology.
- Whether the emissions calculation methodologies used in the application are flawed or outdated.
- Whether proposed air monitoring and reporting requirements are adequate to ensure compliance with the Clean Air Act and protect local residents.

IV. Conclusion

Commenters appreciate the opportunity to file these comments and this contested case hearing request and reserve the right to provide additional information on the matters discussed in this document as allowed by the Clean Air Act, the Texas Clean Air Act, and regulations implementing these statutes.

/s/ Colin Cox

ENVIRONMENTAL INTEGRITY PROJECT

Colin Cox

Staff Attorney

1206 San Antonio St.

Austin, Texas 78701

832-316-0580

colincox@environmentalintegrity.org

IP No.	230802	Name	COX, COLIN	Organization	ENVIRONMENTAL INTEGRITY PROJECT	Title	
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IP Detail	Address	Electronic Communications	Items & Actions	Additional IDs	Counties	Customers & Regulated Entities
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* Request Received Date Last Polling Date ☐ Legislator

Comment

Individual

Name ↕	Prefix	Suffix	Title ↕	Organization ↕	Concerned Citizen ↕	Delete
COX, COLIN	-	-		ENVIRONMENTAL INTEGRITY ...	NO	<input type="button" value="X"/>

Address

Street/PO Box	1206 SAN ANTONIO ST	State	TX	Zip	78701-1834
City	AUSTIN	Country	USA		
Building/Mail Drop					

Electronic Communications

Type	PHONE	Country	Phone	(832) 316-0580	Ext.
Type		Country	Fax		Ext.
Type	EMAIL	colincox@environmentalintegrity.org			

Interested Person Detail

IP No. 230802

Name COX, COLIN

Organization ENVIRONMENTAL INTEGRITY PROJECT

Title

IP Detail

Address

Electronic Communications

Items & Actions

Additional IDs

Counties

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Items

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Number ↕	Program ↕	ID Type ↕	Additional ID ↕	Principal ↕	CN ↕	Status ↕	Active ↕	Comments ↕	Delete
124578	AIROP	PERMIT	3580 + 1	CORPUS CHRISTI LIQU...	CN604136374	ACTIVE	YES	NQ	✖
124528	AIRNSR	EPA PERMIT	166032 + 2	ENTERGY TEXAS INC	CN603282054	ACTIVE	YES	NQ	✖
123404	AIRNSR	PERMIT	105710 + 2	CORPUS CHRISTI LIQU...	CN604136374	ACTIVE	YES	NQ	✖
123266	AIRNSR	PERMIT	6606	FLINT HILLS RESOURC...	CN605721935	ACTIVE	YES	NQ	✖
122484	AIRNSR	EPA PERMIT	122362 + 2	ENBRIDGE INGLESIDE ...	CN605745140	ACTIVE	YES	NQ	✖

Associate...

Actions

Date/Time ↕	Type ↕	Delivery ↕	Acknowledgement ↕	Comments ↕	Documents ↕	Delete
06/17/2021 12:47 PM	HEARING REQUEST	ECOMMENT	-	YES	YES	✖
06/17/2021 12:47 PM	PUBLIC MEETING - REQUEST	ECOMMENT	-	YES	YES	✖
06/14/2021 02:58 PM	HEARING REQUEST	ECOMMENT	-	YES	YES	✖
06/14/2021 02:58 PM	PUBLIC MEETING - REQUEST	ECOMMENT	-	YES	YES	✖
05/21/2021 10:28 AM	MAILING LIST ADD	ECOMMENT	-	YES	NO	✖

Add...

Edit Protestant Comments

Comments

Please see the attached comments, public meeting request, and contested case hearing request, submitted on behalf of Portland Citizens United, Sierra Club, Texas Campaign for the Environment, and Environmental Integrity Project.

Documents

File Name	Remove
CCL 105710 Comments FINAL.pdf	
1-1 of 1 records Page 1 of 1 1 5	

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1206 San Antonio St.
Austin, Texas 78701
Phone: 832-316-0580
www.environmentalintegrity.org

June 14, 2021

Ms. Laurie Gharis
Chief Clerk, MC-105
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Via Electronic Filing

Re: Comments, Public Meeting Request, and Contested Case Hearing Request on the Application to Amend Air Quality Permit No. 105710 to Increase Emissions at the Corpus Christi Liquefaction Terminal

Dear Ms. Gharis,

Corpus Christi Liquefaction, LLC ("CCL"), a subsidiary of Cheniere Energy, Inc., has applied to the Texas Commission on Environmental Quality ("TCEQ") for an amendment to Air Quality Permit No. 105710 (the "Application") to authorize additional emissions of Nitrogen Oxides, Carbon Monoxide, Volatile Organic Compounds, and other pollutants from flares at its liquefied natural gas terminal (the "Terminal") in San Patricio and Nueces Counties, Texas.

Portland Citizens United, Sierra Club, Texas Campaign for the Environment, and Environmental Integrity Project (collectively, "Commenters") appreciate the opportunity to submit these comments on the Application. Commenters request a public meeting be held regarding the Application. Members of each group request the opportunity to discuss the Application with representatives from CCL and TCEQ.

I. Contested Case Hearing Request

Portland Citizens United and Sierra Club request a contested case hearing on this Application. Please direct all communication regarding this hearing request to Colin Cox, Staff Attorney at Environmental Integrity Project.

a. Information in support of Portland Citizens United's contested case hearing request.

Portland Citizens United is a grassroots community group of citizens who care deeply about their community and its values as a clean, family-oriented city, with good neighbors and an excellent school system. Portland Citizens United members have one overarching goal: protecting their homes, children, and quality of life. Portland Citizens United was originally formed in 2017 to resist the construction of a large ethane cracker in Portland. Since then, its mission has expanded to include educating Portland residents about industrial activity in the area, and opposing that activity when it threatens the health, safety and natural beauty of the Portland community. Portland Citizens United members live in close proximity to the Terminal and are harmed by CCL's air pollution and frequent flaring.

Encarnacion Serna is a member of Portland Citizens United and lives at 105 Lost Creek Drive, Portland, TX 78374. Mr. Serna lives with his wife less than two miles from the Terminal, and can see and hear the Terminal's flares from their property. He spends a considerable amount of time outdoors with his children and grandchildren, both on his property and boating and fishing in the bay. Mr. Serna is concerned by the near-constant flares burning at CCL and the pollution they release. When CCL's flares are exceedingly large, he and his wife go inside their home to avoid exposure to air pollution, which exacerbates their allergies. Mr. Serna is troubled with CCL's application to increase pollution from the flares. He is worried it may further inhibit his ability to spend time outdoors with his family.

Donna and James Rosson are members of Portland Citizens United and live at 1110 Cupertino Street, Portland, TX 78374. The Rossons live with their young children, less than 1.5 miles from the Terminal. They can see and hear the Terminal's flares from their property, and understand that flaring means pollution is being released. Mr. and Mrs. Rosson are concerned that increased pollution from the Terminal will increase the risk of negative health effects for their family. They are worried that they will be exposed to air pollution from CCL while enjoying their backyard pool and waterslide, and that their children will be exposed to air pollution while they play in their backyard sandbox or on their swing set. The Rossons sometimes curtail their outdoor activities in response to text message alerts that CCL is flaring. They are worried that an increase in CCL's flaring will limit their enjoyment of the outdoors.

b. Information in support of Sierra Club's contested case hearing request.

Sierra Club, a California non-profit corporation with an office in Austin, is the nation's oldest conservation organization. The Sierra Club's state and local chapters include thousands of Texas members who are dedicated to exploring, enjoying, and protecting Texas' natural resources and wild places. Sierra Club promotes the responsible use of the Earth's ecosystem and resources, and works to restore the quality of the natural and human environment. In addition to organizing nature outings and public education campaigns, Sierra Club and its Texas members pursue advocacy and litigation on issues including clean air and clean water, solid waste reduction, and sustainable energy and land use policies. Sierra Club members live in close proximity to the Terminal and are harmed by CCL's air pollution and frequent flaring.

Wendy Hughes is a member of Sierra Club and Portland Citizens United, and lives at 2129 Bay Breeze Drive, Portland TX 78374. Mrs. Hughes lives with her husband and son less than 1.5 miles from the project site, and can see CCL's flares burning and sometimes smoking from her property. She is concerned about industrial air pollution and the effects it may have on her health, as well as her family's health. Mrs. Hughes enjoys walking her dog in the area and taking walks on the beach, but curtails these activities because she is concerned about her exposure to air pollution from the Terminal. She is worried that if CCL is allowed to increase its flaring, she will not be able to spend as much time outside, even on her own property. If local air quality continues to deteriorate she has contemplated selling her home and moving away from CCL.

Uneeda Laitinen is a member of Sierra Club and lives at 102 Markham Place, Portland, TX 78374. Mrs. Laitinen lives just over two miles from the Terminal, and can see the Terminal's flares from her property. Mrs. Laitinen is sensitive to air pollution because she suffers from multiple respiratory ailments, including asthma, emphysema, and chronic obstructive pulmonary disease. She uses two inhalers to aid in breathing on a daily basis and sometimes uses supplemental oxygen. She has observed a worsening of air quality and a corresponding worsening of her respiratory symptoms over the past several years as multiple large sources of air pollution have been built near her home, including CCL's Terminal. Mrs. Laitinen is concerned that increased pollution from CCL will further interfere with her use and enjoyment of her property. Specifically, she may have to limit gardening and spending time outside of her home if CCL is allowed to increase pollution from its flares.

II. The Application fails to demonstrate compliance with Best Available Control Technology requirements.

This application is deficient for its failure to analyze and apply Best Available Control Technology (“BACT”) for the flares. The Clean Air Act requires that new and modified sources of air pollution install pollution control technology that is at least as effective as the best technology currently in use at similar plants around the country. Emission limits based on BACT must be achievable in practice and the permit must include a reliable method for determining compliance with that limit. CCL’s flare BACT analysis is deficient because its proposed flare design, operating, and compliance assurance methods fail to incorporate elements—found in permits and regulations for comparable sources—necessary to assure ongoing compliance with the emission limits CCL proposes.

a. CCL’s BACT analysis fails to consider enhanced flare operating, design, and monitoring requirements found in regulations, consent decrees, settlements, and permits for comparable sources.

CCL proposes to control volatile organic compounds and carbon monoxide emissions from the flares primarily by designing and operating all flares to meet the requirements of 40 CFR § 60.18 and by designing the Terminal to minimize flaring. CCL proposes to control nitrogen oxides emissions from the flares by designing the Terminal to minimize flaring. For volatile organic compounds, CCL assumes that these methods will ensure a destruction removal efficiency of 99% for compounds with three carbons or less and a destruction removal efficiency of 98% for compounds with four carbons or more.

However, as Environmental Protection Agency (“EPA”) studies and rulemakings dating back nearly 10 years reveal, the general design and operating requirements proposed by CCL are insufficient to ensure that flares achieve the represented level of performance.¹ In a 2019 memorandum supporting EPA’s National Emission Standards for Hazardous Air Pollutants (“NESHAP”) for ethylene production, EPA explained that ethylene production facility flares complying only with the general NESHAP flare standards, which are similar to § 60.18 requirements,

¹ See, e.g., EPA Enforcement Targets Efficiency Violations (August 2012) (indicating that parameters affecting the efficiency of flares, like the steam-to-vent gas ratio and the heating value of the combustion zone gas are not captured by general standards, like § 60.18) available electronically at: <https://www.epa.gov/sites/production/files/documents/flaringviolations.pdf>; EPA Office of Air Quality Planning and Standards, Parameters for Properly Designed and Operated Flares at 3-32 (April 2012) (providing that reliance on general flare requirements, like § 60.18 “as an indicator of good combustion ignores any effect of steaming.”) available electronically at: <https://www3.epa.gov/airtoxics/flare/2012flaretechreport.pdf>.

are not achieving the purported 98% destruction efficiency. Rather, EPA estimated that “the baseline level of control for all ethylene flares in the source category would fall on average somewhere between 86.6 percent and 94.2 percent”—or 90.4 percent, as “an average of these two numbers.”² In finalizing revised operational and monitoring requirements that would address these factors at ethylene production facilities, EPA estimated that the revised flare standards “have the potential to reduce excess emissions from flares by approximately 1,430 tpy of HAP and 13,020 tpy of VOC.”³

These studies strongly suggest that CCL’s application overestimates destruction removal efficiency. Currently, the permit assumes high destruction removal efficiency but lacks any requirements to verify that it is being achieved in practice.

CCL’s Application wrongly limits its analysis of control technologies to the RACT/BACT/LAER Clearinghouse. A broader search reveals that enhanced flare controls similar to those established by EPA’s Ethylene Production and Refinery NESHAPs have already been required by consent decrees, settlements, and air permits issued for petrochemical plants in Pennsylvania, Texas, and Louisiana. For example, Shell’s Pennsylvania Petrochemicals Complex, which consists of an ethylene cracker with a polyethylene derivatives unit, must comply with enhanced flare design and operating requirements found at 40 C.F.R. § 63.987(c) (monitoring of flame presence), § 63.671 (operation and maintenance of flare monitoring systems), and § 63.670(d)-(f), (i)-(n), (p) (establishing flare—tip velocity requirements, requirement to maintain specified net heating value of the combustion zone on a 15-minute block average basis, requirement to monitor flow rate of all gas stream that contribute to the flare vent gas and assist steam, requirement to monitor flare vent gas composition, and requirement to use specified calculation methods for velocity, flow rate, composition, and heating value).⁴

In 2018, EPA entered into a consent decree with ExxonMobil for serious Clean Air Act violations resulting from underperforming flares at eight of the company’s

² Memorandum from Andrew Bouchard to EPA, Docket No. EPA-HQ-OAR-2017-0357, Re: Control Option Impacts for Flares Located in the Ethylene Production Source Category (March, 2019) available electronically at: <https://www.regulations.gov/document?D=EPA-HQ-OAR-2017-0357-0017>.

³ National Emission Standards for Hazardous Air Pollutants, Generic Maximum Achievable Control Technology Standards Residual Risk and Technology Review for Ethylene Production, 84 Fed. Reg. 54,278, 54,301 (October 9, 2019).

⁴ Settlement Agreement Between Shell Chemical Appalachia LLC and Clean Air Council and Environmental Integrity Project (August, 2017) available electronically at: <https://environmentalintegrity.org/wpcontent/uploads/2017/02/2017.08.25-Shell-Settlement-Agreement.pdf>.

chemical and plastics manufacturing plants in Texas and Louisiana.⁵ Pursuant to this consent decree, ExxonMobil must install additional monitoring and control equipment that reflects requirements found in EPA's NESHAPs for refinery and ethylene production plants.⁶ These requirements have been incorporated into ExxonMobil's permits issued by the TCEQ.

CCL's BACT analysis must adopt flare design, operating, and monitoring requirements consistent with those found in the Shell settlement and the ExxonMobil Consent Decree. These requirements are necessary to assure that CCL's flare will actually achieve the assumed level of control on an ongoing basis. Specifically, 40 C.F.R. § 63.670(e) requires operation of flares to maintain a net heating value of the flare combustion zone gas (NHV^{cz}) at or above 270 British thermal units per standard cubic feet (Btu/scf) determined on a 15-minute block period basis when regulated material is routed to the flare for at least 15 minutes. In order to calculate and demonstrate compliance with combustion zone limits, CCL must install, operate, calibrate and maintain a monitoring system capable of continuously measuring, calculating and recording the volumetric flow rate of all gas streams that contribute to the flare vent gas as well as the volumetric flow rate of assist gas used with the flare. The concentration of individual components in the flare vent gas must also be measured at least once every 15 minutes, or alternatively the net heating value of the vent gas can be measured continuously.

For steam-assisted flares, the calculation of NHV^{cz} should combine supplemental information with the net heating value of the vent gas to provide additional context for meeting required combustion efficiencies. The equation for NHV^{cz} in 40 C.F.R. § 63.670(m)(1) includes the measurement of assist steam flow on a 15-minute block average to account for the overall impact on the heating value of the combustion zone, with an increase in steam flow resulting in a decrease in NHV^{cz}. EPA's 1983 Flare Efficiency Study shows that for steam-assisted flares, excessive steam-to-vent gas ratios can lead to steam quenching of the flame, resulting in notably lower combustion efficiency.⁷

Specifically, the study provides data showing that steam-to-vent gas ratios above 3.5 result in considerably lower combustion efficiencies. For example, a steam-to-vent gas ratio of 5.67 (pound to pound) resulted in a combustion efficiency of

⁵ Consent Decree, EPA v. ExxonMobil, Civil Action No. 4:17-cv-3302 ("ExxonMobil Consent Decree") (June 6, 2018) available electronically at: <https://www.epa.gov/sites/production/files/2018-06/documents/exxonmobilcorp-cd.pdf>.

⁶ ExxonMobil Consent Decree at Paragraphs 20-27, 39-43.

⁷ Flare Efficiency Study, EPA-600/2-83-052 (July, 1983) available electronically at: https://www3.epa.gov/ttn/chief/ap42/ch13/related/ref_01c13s05_jan1995.pdf

82.18%, while a steam-to-vent gas ratio of 6.86 resulted in a combustion efficiency of 68.95%. EPA cited this study in a Notice of Violation issued to the Wood River Refinery, presenting the impact of steam-to-vent gas ratios on flare combustion efficiency, and validating that "several recent studies have been conducted with the use of passive Fourier transform infrared spectroscopy that verify the conclusion reached in EPA 600/2-83-052." EPA's 1983 study, along with additional information presented in the more recent dockets for EPA's NESHAPs for refineries and ethylene production, demonstrate that CCL must monitor and manage flare assist steam or airflow rates on a continuous basis to continuously meet the represented destruction removal efficiency.

Commenters request that the Executive Director require CCL to comply with enhance flare design, monitoring, and operating requirements found in EPA's refinery and ethylene production NESHAPs and the above-cited settlement, consent decree, and permits.

b. CCL's application may overstate the flare's ability to control volatile organic compound emissions during certain operating conditions.

CCL's BACT analysis for its flares assumes the flares will have a destruction removal efficiency of 99% for compounds up to three carbons and 98% for compounds of four or more carbons, which matches the default controls within TCEQ's New Source Review Guidance for Flares and Vapor Combustors workbook.⁸ CCL uses this destruction removal efficiency to calculate emission limits representing the flare's potential to emit. While Commenters appreciate that the proposed level of volatile organic compound destruction removal efficiency and potential to emit reflect a high level of performance, we are concerned that the represented destruction removal efficiency may not be achievable in practice under certain operating conditions. A unit's represented potential to emit for permitting purposes must be a conservative value that is achievable in practice, and enforceable through reliable compliance determination methods.

Commenters are concerned because some manufacturers have been unwilling to guarantee the 99% destruction removal efficiency for three carbon compounds ("C3") when a flare is combusting a mixture of three and four (or greater) hydrocarbon compounds ("C4+"). Because monitoring methods proposed by CCL do not allow for a meaningful determination of the level of destruction removal efficiency actually

⁸ TCEQ, BACT Guidelines for Chemical Sources (March 19, 2019) available electronically at: https://www.tceq.texas.gov/permitting/air/nav/air_bact_chemsource.html.

achieved under different operating scenarios, it is when its flare is combusting a mixture of C3 and C4+ compounds. Unless CCL has obtained a vendor guarantee for 99% destruction removal efficiency of C3 compounds under such circumstances, the Executive Director should require the company to revise its application in one of two ways:

First, CCL could calculate its potential to emit conservatively using a 98% destruction removal efficiency across all scenarios, including for C3 and below. Calculating potential to emit in this way would decrease the likelihood that the application understates actual emissions from the flare. Or, if CCL has a guarantee for 99% destruction removal efficiency when only C3 compounds are being combusted, CCL could calculate the flare's potential to emit based on the 99% destruction removal efficiency when only C3 compounds are being combusted and a 98% destruction removal efficiency when C4+ compounds or a mixture of C3 and C4+ compounds are combusted.

Commenters request that the Executive Director require CCL to provide updated application representations, including vendor guarantee terms, showing that its potential to emit estimates are reasonable and achievable in practice.

III. Disputed Issues of Fact

In addition to the issues detailed above, Commenters provide the following list of disputed issues that are relevant and material to the Commission's decision on this application, for consideration as part of the requested contested case hearing:

- Whether the proposed emissions will threaten the health and safety of nearby residents.
- Whether the proposed emissions will cause or contribute to exceedances of National Ambient Air Quality Standards.
- Whether the proposed emissions will exceed allowable Prevention of Significant Deterioration Increments.
- Whether the proposed emissions will cause nuisance conditions violating 30 Tex. Admin. Code § 101.4.
- Whether the TCEQ considered cumulative risks of nearby sources of air pollution.

- Whether Draft Permit conditions are adequate to protect the public from cumulative risks in accordance with Tex. Water Code § 5.130.
- Whether the Applicant's air quality analysis is flawed.
- Whether the modified sources will utilize Best Available Control Technology.
- Whether the emissions calculation methodologies used in the application are flawed or outdated.
- Whether proposed air monitoring and reporting requirements are adequate to ensure compliance with the Clean Air Act and protect local residents.

IV. Conclusion

Commenters appreciate the opportunity to file these comments and this contested case hearing request and reserve the right to provide additional information on the matters discussed in this document as allowed by the Clean Air Act, the Texas Clean Air Act, and regulations implementing these statutes.

/s/ Colin Cox

ENVIRONMENTAL INTEGRITY PROJECT

Colin Cox

Staff Attorney

1206 San Antonio St.

Austin, Texas 78701

832-316-0580

colincox@environmentalintegrity.org

From: PUBCOMMENT-OCC
To: PUBCOMMENT-APD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)
Date: Wednesday, June 16, 2021 1:39:24 PM

PM
H

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Wednesday, June 16, 2021 7:50 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Annie Dixon <Annie.Dixon.460434117@p2a.co>
Sent: Tuesday, June 15, 2021 6:19 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Annie Dixon
336 13th St
Port Arthur, TX 77640 |

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Monday, July 12, 2021 11:26 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

PM
H

NSR
123404

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Friday, July 9, 2021 4:54 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Jean Fuertez <Jean.Fuertez.297872906@p2a.co>
Sent: Friday, July 9, 2021 4:29 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Jean Fuertez
7125 Southhaven Dr
Corpus Christi, TX 78412 .

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Tuesday, July 6, 2021 10:02 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

PM
H

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Friday, July 2, 2021 4:08 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Penny Gray <Penny.Gray.422590729@p2a.co>
Sent: Friday, July 2, 2021 4:01 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Penny Gray
6318 Nancy Dr
Corpus Christi, TX 78412 .

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Friday, July 2, 2021 8:28 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

PM
H

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Friday, July 2, 2021 8:06 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Don Guion <Don.Guion.344282610@p2a.co>
Sent: Thursday, July 1, 2021 4:32 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Don Guion
298 Retreat Dr
Taft, TX 78390.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Thursday, June 24, 2021 5:09 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

PM
H

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Thursday, June 24, 2021 2:19 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Billy Gunn <Billy.Gunn.445805059@p2a.co>
Sent: Wednesday, June 23, 2021 6:12 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Billy Gunn
1034 Concho Dr
Corpus Christi, TX 78407 ▪

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Wednesday, July 14, 2021 9:01 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

PM
H

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Tuesday, July 13, 2021 4:54 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Kyle Krauskopf <Kyle.Krauskopf.413589398@p2a.co>
Sent: Tuesday, July 13, 2021 3:33 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Kyle Krauskopf
243 W Roberts Ave
Port Aransas, TX 78373 ▪

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Wednesday, July 14, 2021 9:03 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

PM
H

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Tuesday, July 13, 2021 4:54 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Maria Krauskopf <Maria.Krauskopf.413589398@p2a.co>
Sent: Tuesday, July 13, 2021 3:33 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Maria Krauskopf
243 W Roberts Ave
Port Aransas, TX 78373 .

Debbie Zachary

From: PUBCOMMENT-OCC
Sent: Tuesday, July 5, 2022 1:19 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: Public comment on Permit Number 105710

H

From: uneedalaitinen@gmail.com <uneedalaitinen@gmail.com>
Sent: Thursday, June 30, 2022 4:18 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 105710

REGULATED ENTY NAME CORPUS CHRISTI LIQUEFACTION

RN NUMBER: RN104104716

PERMIT NUMBER: 105710

DOCKET NUMBER:

COUNTY: SAN PATRICIO

PRINCIPAL NAME: CORPUS CHRISTI LIQUEFACTION LLC

CN NUMBER: CN604136374

FROM

NAME: MRS Uneeda E Laitinen

EMAIL: uneedalaitinen@gmail.com

COMPANY:

ADDRESS: 102 MARKHAM PL
PORTLAND TX 78374-1418

PHONE: 3618773523

FAX:

COMMENTS: MI oppose Cheniere's Air Permit Amendment request on Permit No, 105710. I request the permit amendment request be denied. I also request a contested case hearing be held locally regarding this permit amendment request. We are a country of laws, however where laws and regulations pertaining to the petrochemical industry are concerned the environment and public health take a back seat to the greed, needs, and desires of industry. The EPA does not sufficiently protect the environment or the public health from the detrimental and devastating effects of air

pollution which result from the petrochemical industry. The TCEQ does not sufficiently protect the environment or the public health from the detrimental and devastating effects of air pollution which result from the petrochemical industry. The industrial polluters, nor the regulators who govern them, do not know exactly how much hazardous air pollution is billowing out of smokestacks and flares at any given time, nor the degree to which that pollution is finding its way into surrounding neighborhoods. The law DOES NOT require them to. The Clean Air Act of 1990 mandated how the EPA would regulate industrial air pollution, monitoring methods were crude, expensive and limited. The EPA allowed facilities to estimate their emissions of hazardous air pollutants, also called air toxics, like hexavalent chromium and ethylene oxide that can cause cancer, respiratory illnesses, heart problems and other ailments. The agency entrusted states to enforce these rules through air permits, which set limits on the amount of chemicals each facility could emit. Despite dramatic advances in technology, a lot of these permits still rely on self-reported estimates that are often outdated, incomplete or inaccurate. Only rarely do regulators check to see if what is reported matches reality. This whole regulatory system is based on a lack of good data. It gets harder and harder to argue with a straight face that it's unreasonable to require extensive monitoring. The EPA and TCEQ could install air monitors in communities to gauge how much toxic pollution reaches neighborhoods. But there's no federal requirement to do that. Analysis of modeled EPA emissions data identified more than 1,000 hot spots of toxic air pollution nationwide. Yet the EPA spends only \$5 million per year to run 26 monitoring stations across the country; it offered another \$5 million last year for state and local air monitoring grants. Additionally, \$25 million from President Biden's coronavirus stimulus package to help communities monitor for air pollutants of interest, including air toxics is available. If a neighborhood is among the minority of hot spots to get a monitor installed, and if that monitor reveals that residents are, indeed, breathing in troubling levels of air toxics, the law DOES NOT require regulators to investigate to see whether nearby polluters are violating air permits. There is no environmental cop on the beat. In a recent statement, the EPA said it is working to improve its data on emissions of toxic air pollution, do more to communicate risks to the public, develop regulatory solutions and reduce pollution. "Too many communities have suffered disproportionately from air pollution and other environmental burdens for far too long," the agency said. "EPA recognizes the continued frustration experienced by residents living with increased health risks due to environmental pollution." So far, such residents have often been left to fend for themselves. Across the country at any given time, countless kitchen table activists toil in relative obscurity, struggling to get help from the agencies that are supposed to protect them. To get the agencies' attention, they need to organize, hire lawyers and technical experts, collect evidence of the pollution's impact, and drum up publicity. Regulators have a tremendous amount of discretion about how deeply they investigate citizen complaints. It's always interesting to see agencies respond when there's embarrassing stories in the media. The EPA says it "strives" to minimize the number of people subjected to an excess cancer risk higher than 1 in a million — meaning that if a million people were exposed to the same concentration of industrial pollution over a lifetime of 70 years, at least one person would likely develop cancer; that risk is on top of other risk factors like age, diet, and genetic predisposition. The agency sets the maximum acceptable industrial cancer risk at 1 in 10,000 — a level 100 times less stringent than the 1-in-a-million goal. Numerous experts have stated it was too high. The EPA and TCEQ underestimates the cumulative risk faced in neighborhoods which are surrounded by polluters because it examines the impacts of facilities by category, without considering the combined risks when multiple types of polluters are clustered together. Due to emissions coming from multiple facilities the surrounding communities are subjected to a constant barrage of toxic pollution. As more of the residents sicken and die due to toxic exposure to air born pollutants the EPA and TCEQ will sit on their hands and do nothing to stop the serial polluters from injuring and killing the local population and decimating the environment. Considering the recent explosion at the LNG facility in Freeport, Texas and their numerous violations cited by TCEQ, the public must be given answers as to the specific violations already committed by Cheniere and the steps which have been taken to remediate said violations before any consideration is granted by TCEQ regarding the requested permit amendment. Specifically, we need to know the exact quantity of explosives (natural gas, ethylene, propane, etc.) in Cheniere's on-site inventory. What are the maximum throughputs for all three trains when in full operation? How will Cheniere deal with a fire, explosion, or catastrophic failure? Who has a copy of Cheniere's fire response plan? Is said plan available to the public? Is so, where? Cheniere maintains a RTFC team on site. What is the composition of the RTFC and who is in charge? Have local fire departments been trained in conjunction with Chenier's RTFC on site? If so, how often does the training occur? If surrounding fire departments are to "render assistance if called upon", whom would they report to? Who would oversee the RTFC and local fire departments? Who would be the person in charge and ultimate decision maker? How often are routine onsite TCEQ inspections done at the Cheniere facility? If a catastrophic failure should occur what is the worst-case scenario? If a catastrophic failure occurs what is the estimated geographic

area of destruction? How will the surrounding cities be impacted by the fire/explosion shock wave? How much advance warning would be given to the public? How would the public receive an advance warning? In 2018 Cheniere reported one hundred nineteen (119) deviations/violations of existing permits and amendments. In 2019 Cheniere reported two hundred and forty-six (246) deviation/violations, 19 violations were reported as "unauthorized LNG venting to the marine flare" resulting in unpermitted amounts of "several pollutants" from the marine flare. In 2020 Cheniere reported two hundred and ninety-three (293) deviations/violations of the existing permits and amendments in 2020. I also question the eight (8) "visible flare emissions" in 2020 due to VOC's. I see the flare from my home, and I can guarantee there were more than 8 visible flare emissions. I sincerely question the data. Are more efficient scrubbers available for the flares? Of the 658 violations reported between 2018 and 2020: How many of the violations have been investigated by TCEQ? Have steps been taken to address the violations? Has TCEQ conducted onsite inspections to verify said violations have been remediated? As a concerned member of the public who lives within one mile of the Cheniere facility I am very concerned for my family's health and safety. TCEQ does not appear to be concerned or cognizant of the daily perils the citizens of San Patricio County face every day. TCEQ must be more diligent and live up to the responsibilities the citizens of Texas have entrusted to them. We, the citizens of Texas, pay your salary not the petrochemical industry. You are accountable to US. We demand that you, "DO YOUR JOB!" This a time for excellence not complacency. A time for due diligence, not shirking away from your responsibility to the environment and the people of Texas. Rather than constantly request permit amendments Cheniere should inform the public of its failures and successes. If we are to be neighbors, then respect the public enough to be honest about the operations of Cheniere's facility. Truth spreads light and understanding while darkness spreads mistrust and fear. I am in my golden years, and I will not have to contend with your successes or failures much longer. However, my Grandchildren will have to live or die with the decisions you make. You will be held accountable, if not on this earth, then above. May God have mercy upon you, for I will not!

13

TCEQ Registration Form

June 30, 2022

Corpus Christi Liquefaction, LLC

Proposed Amendment to Air Quality Permit No. 105710

PLEASE PRINT

Name: Uneda Laitinen

Mailing Address: 102 Markham Pl.

Physical Address (if different): _____

City/State: Portland, Tx Zip: 78374

****This information is subject to public disclosure under the Texas Public Information Act****

Email: unedalaitinen@gmail.com

Phone Number: (361) 877-3523

- Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☒ No

If yes, which one? _____

☒ Please add me to the mailing list.

☒ I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

☐ I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

From: [PUBCOMMENT-OCC](#)
To: [PUBCOMMENT-APD](#); [PUBCOMMENT-ELD](#); [PUBCOMMENT-OCC2](#); [PUBCOMMENT-OPIC](#)
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)
Date: Monday, June 14, 2021 8:07:12 AM

PM
H

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Saturday, June 12, 2021 9:40 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Dewey Magee <Dewey.Magee.200564391@p2a.co>
Sent: Friday, June 11, 2021 4:32 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Dewey Magee
4252 Kestrel Ln
Portland, TX 78374 |

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Tuesday, July 13, 2021 8:15 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

PM
H

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Tuesday, July 13, 2021 8:05 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Justin Martinez <Justin.Martinez.465709009@p2a.co>
Sent: Monday, July 12, 2021 5:10 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Justin Martinez
1002 Anderson St
Corpus Christi, TX 78411 ▪

IP No.	234747	Name	PARKINSON, BLANCA	Organization		Title	
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IP Detail

Address

Electronic Communications

Items & Actions

Additional IDs

Counties

Customers & Regulated Entities

* Request Received Date

03/18/2021

Last Polling Date

Legislator

Comment

Save

Reset

Individual

Name	Prefix	Suffix	Title	Organization	Concerned Citizen	Delete
PARKINSON, BLANCA	-	-			NO	

Add...

Address

Street/PO Box	10801 SILVERTON DR	State	TX	Zip	78410-2233
City	CORPUS CHRISTI	Country	USA		
Building/Mail Drop					

Electronic Communications

Type	PHONE	Country	Phone	(361) 704-2775	Ext.
Type		Country	Fax		Ext.
Type	EMAIL			bp120380@gmail.com	

Interested Person Detail

IP No. 234747

Name PARKINSON, BLANCA

Organization

Title

IP Detail

Address

Electronic Communications

Items & Actions

Additional IDs

Counties

Customers & Regulated Entities

Items

Show more columns

Number ↕	Program ↕	ID Type ↕	Additional ID ↕	Principal ↕	CN ↕	Status ↕	Active ↕	Comments ↕	Delete
130479	AIROP	PERMIT	3454	FLINT HILLS RESOURC...	CN605721935	ACTIVE	YES	NO	✖
126778	WWPERMIT	PERMIT	WQ0005019000	CORPUS CHRISTI POL...	CN605616226	ACTIVE	YES	NO	✖
126282	AIRNSR	PERMIT	3454 + 3	FLINT HILLS RESOURC...	CN605721935	ACTIVE	YES	NO	✖
123404	AIRNSR	PERMIT	105710 + 2	CORPUS CHRISTI LIQU...	CN604136374	ACTIVE	YES	NO	✖
123266	AIRNSR	PERMIT	6606	FLINT HILLS RESOURC...	CN605721935	ACTIVE	YES	NO	✖

Associate...

Actions

Date/Time ↕	Type ↕	Delivery ↕	Acknowledgement ↕	Comments ↕	Documents ↕	Delete
06/30/2022 07:00 PM	COMMENT - ORAL	ATTEND PM	-	NO	NO	✖
06/13/2021 10:49 PM	PUBLIC MEETING - REQUEST	ECOMMENT	-	YES	NO	✖
06/13/2021 09:31 PM	HEARING REQUEST	ECOMMENT	-	YES	NO	✖

Add...

Edit Protestant Comments

Comments

My name is Blanca Parkinson. I live at 10801 Silverton Dr. Corpus Christi, TX 78410. My parents own a home at 105 Lost Creek Portland, TX. We visit Portland daily to fish, swim, and kayak. Our children's running team practices and runs on the trails and neighborhoods surrounding the site of this massive flare.

I strongly oppose the granting of this air permit amendment. Both the TCEQ and Cheniere have failed to provide any feedback or responses to the concerns and questions presented by knowledgeable residents of the area who are well aware and informed of the danger, health risks, and disruptions that this flare brings to their daily lives. The large number of amendments ALREADY submitted by the applicant, and granted by the TCEQ are a huge indication that it's time for the TCEQ to step in and actually protect the health and safety of the people and environment in this area.

It is for these reasons, that I request that this air permit amendment to an already out-of-control flare be denied, and that the TCEQ grant a contested case hearing.

Documents

+ Choose File

Drag & Drop files to the box above to upload, or select Choose File

Ok

Reset

Cancel

7

TCEQ Registration Form

June 30, 2022

Corpus Christi Liquefaction, LLC

Proposed Amendment to Air Quality Permit No. 105710

PLEASE PRINT

Name: Blanca Parkinson

Mailing Address: 10801 Silverton Drive

Physical Address (if different): _____

City/State: ~~Portland TX~~ Corpus Christi Zip: 78410

****This information is subject to public disclosure under the Texas Public Information Act****

Email: _____

Phone Number: () _____

- Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☒ No

If yes, which one? _____

☐ Please add me to the mailing list.

☒ I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

☐ I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Monday, June 14, 2021 8:03 AM
To: PUBCOMMENT-APD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 105710

PM

From: bp120380@gmail.com <bp120380@gmail.com>
Sent: Sunday, June 13, 2021 10:50 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 105710

REGULATED ENTY NAME CORPUS CHRISTI LIQUEFACTION

RN NUMBER: RN104104716

PERMIT NUMBER: 105710

DOCKET NUMBER:

COUNTY: SAN PATRICIO

PRINCIPAL NAME: CORPUS CHRISTI LIQUEFACTION LLC

CN NUMBER: CN604136374

FROM

NAME: Blanca Parkinson

E-MAIL: bp120380@gmail.com

COMPANY:

ADDRESS: 10801 SILVERTON DR
CORPUS CHRISTI TX 78410-2233

PHONE: 3617042775

FAX:

COMMENTS: My name is Blanca Parkinson. I live at 10801 Silvertown Dr. Corpus Christi, TX. My parents live at 105 Lost Creek Dr. Portland, TX. I have previously commented to oppose this air permit amendment. I would like to follow-up my previous comment with a request for a public meeting. As of now, both the TCEQ and Cheniere Liquefaction Plant have not publicly answered or responded to any of the public's questions or concerns. Citizens of this area are relying on informed residents who are giving of their time and knowledge in order to decipher these permit applications, and

provide some insight as to what is in the future of this area. Considering the residential nature of the area that the plant is located in, (there are neighborhoods, schools, day care centers, and assisted living senior homes in very close proximity to the flare) it is important that a public meeting be held. Thank you, Blanca Parkinson

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Friday, July 2, 2021 8:28 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

PM
H

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Friday, July 2, 2021 8:05 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Jenifer Pichinson <Jenifer.Pichinson.420861469@p2a.co>
Sent: Thursday, July 1, 2021 8:34 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Jenifer Pichinson
5857 Timbergate Dr
Corpus Christi, TX 78414 .

From: [PUBCOMMENT-OCC](#)
To: [PUBCOMMENT-APD](#); [PUBCOMMENT-ELD](#); [PUBCOMMENT-OCC2](#); [PUBCOMMENT-OPIC](#)
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)
Date: Thursday, June 17, 2021 7:52:45 AM

PM

H

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Wednesday, June 16, 2021 4:12 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Gloria Route <Gloria.Route.460699718@p2a.co>
Sent: Wednesday, June 16, 2021 4:05 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Gloria Route
2120 Angelina St
Beaumont, TX 77701 |

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Wednesday, July 14, 2021 8:31 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

PM
H

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Tuesday, July 13, 2021 10:16 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Esquel Sanchez <Esquel.Sanchez.420381246@p2a.co>
Sent: Tuesday, July 13, 2021 8:42 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Esquel Sanchez
2501 Quebec Dr
Corpus Christi, TX 78414.

①

TCEQ Registration Form

June 30, 2022

Corpus Christi Liquefaction, LLC

Proposed Amendment to Air Quality Permit No. 105710

PLEASE PRINT

Name: ENCARNACION SERNA

Mailing Address: 105 LOST CREEK DRIVE

Physical Address (if different): SAME AS ABOVE

City/State: PORTLAND TEXAS Zip: 78374

This information is subject to public disclosure under the Texas Public Information Act

Email: cachetonle@fwc.com

Phone Number: (361) - 903-5774

- Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☒ No

If yes, which one? _____

☒ Please add me to the mailing list.

☒ I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

☐ I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Wednesday, July 28, 2021 10:19 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ
Subject: FW: Comment Letter for Three WQD Permit Applications
Attachments: EXEC-47725.PDF

NSR
123404

Associate to

- City of Corpus Christi La Quinta Channel Desalination (WQ0005290000)
- City of Corpus Christi Inner Harbor Desalination (WQ0005289000)
- Port of Corpus Christi LaQuinta Channel Desalination (WQ0005254000)

From: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Sent: Tuesday, July 27, 2021 5:26 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: Comment Letter for Three WQD Permit Applications

From: Mark Palmie <Mark.Palmie@tceq.texas.gov>
Sent: Tuesday, July 27, 2021 5:23 PM
To: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Cc: Robert Sadlier <Robert.Sadlier@tceq.texas.gov>
Subject: Comment Letter for Three WQD Permit Applications

Hi Brad,

We received a copy of the attached comment letter that references three WQD permit applications that are currently open for public comment.

Can you please ask your staff to add the comment letter to the following WQD permit applications:

- City of Corpus Christi La Quinta Channel Desalination (WQ0005290000)
- City of Corpus Christi Inner Harbor Desalination (WQ0005289000)
- Port of Corpus Christi LaQuinta Channel Desalination (WQ0005254000)

We appreciate your assistance. Thank you,

Mark Palmie
Special Assistant
Water Quality Division
(512) 239-0849

To: Governor Gregg Abbott, State Senators

Date: July 11, 2021

Judith Zaffirini, Juan "Chuy" Hinojosa, and

Subject: Issuance of Moratoriums to

State Representatives J.M. Lozano, Tod Hunter

Have the TCEQ Reject Sham/Shoddy

And Abel Herrero

Permit Applications

Cc: Other Stake Holders

RECEIVED

From: Encarnacion Serna (Chon)

JUL 14 2021

Dear Governor: Please issue moratoriums requesting the TCEQ do the following:

OOG/CCOM

Dear State Senators and State Representatives: Please request the Governor to issue moratoriums and order the TCEQ do the following:

1. Deny/reject immediately the following permit applications
 - a. City of Corpus Christi La Quinta Channel Desalination Water Rights Permit WRPERM 13675
 - b. City of Corpus Christi La Quinta Channel Desalination Water Quality Permit WQ0005290000
 - c. City of Corpus Christi Inner Harbor Desalination Water Rights Permit WRPERM 13676
 - d. City of Corpus Christi Inner Harbor Desalination Water Quality Permit WQ0005289000
 - e. Port of Corpus Christi La Quinta Channel Desalination Water Rights Permit WRPERM 13630
 - f. Port of Corpus Christi La Quinta Channel Desalination Water Quality Permit WQ0005254000
 - g. Port of Corpus Christi Harbor Island Desalination Water Quality Permit WQ0005253000
 - h. MODA Air Quality NSR Permit No. 122362/PSDTX-1430M1
 - i. Cheniere's Air Permit Amendment 105710
2. Deny/reject immediately any other future application pertaining to desalination where the Corpus Christi Bay/Estuary Systems including inner harbors and ship channels are proposed both as water feed sources and waste discharges to and from these desalination plants.
3. Deny/reject immediately any other future application amendment/request pertaining to increases of pollutant limits and flow limits from existing waste water permits (WQ's and storm waters) that currently discharge to the Corpus Christi Bay/Estuary Systems including inner harbors and ship channels.
4. Deny/reject immediately any future application pertaining to the increase of air pollutants in San Patricio and Nueces County pertaining to all combustion equipment like flares, thermal oxidizers, etc., and non-combustion equipment like tanks pumps etc. Likewise deny/reject immediately any expansion amendment requests to existing air permits that likewise would increase the emission of pollutants in these two counties.
5. Order the TCEQ to inventory all waste water flows (both process and storm waters currently routed to the Corpus Christi Bay/Estuary Systems including inner harbors and ship channels. Include in this inventory/survey all daily and annual flows including pollutants/constituents present in these waste waters.
6. Initiate and introduce legislation to have industry collect and process these waters to be utilized by industry.
7. Order the TCEQ (required or not required by law or rule) to have all individuals; including the TCEQ Executive Director, involved in the writing, preparation, review and approvals of the above eight (8) listed permit applications present their names credentials skills, fields of study,

certifications, and qualifications that qualify them to have been involved in one way or the other with these permit applications.

Failure of our Governor and our elected officials to carry out these moratorium requests would result in the Port of Corpus Christi, the City of Corpus Christi and other unscrupulous organizations and industrial entities like MODA and Cheniere to, cause catastrophic consequences (superfund sites, non-attainment air atmospheres in the Coastal Bend, serious socio-economic issues, and ruined polluted ecosystems and chemistries in our Bay/Estuary Systems.)

I, Encarnacion Serna a retired chemical engineer with very limited resources have read and analyzed the eight permit applications listed above and have found them SHAM/SHODDY for the most part. And so, because this trend of SHAM/SHODDY permit applications is now PANDEMIC, I have added my name to the now thousands (soon to be hundreds of thousands) of citizens protesting, commenting, and requesting the Port the City and the TCEQ to stop this abusive intrusive and invasive madness.

As proof of what I am saying and claiming; attached please find three (3) more Word documents, which are my comments and requests recently submitted to the TCEQ on respective permit requests. Others I have sent to you before. Please review these documents and act soon and quickly.

Respectfully;

Encarnacion Serna 361-903-5774

To: M. David Garcia EPA Division Director

Date: July 12, 2021

Air and Radiation

Subject: MODA Air Permit No. 122362 and

From: Encarnacion Serna

Deviation Reports (2018 to June 2021)

And, Cheniere Air Permit No. 105710

and Deviation Reports (2018 to June 2021)

Dear Sir: Please have your office do thorough reviews on the above-mentioned Air Permits, all their subsequent amendments to these permits and all Deviation Reports submitted to the TCEQ by these sites since commissioning time to day.

Also, I would like for your office to review all the documents I have attached to this letter. These documents have been sent to the TCEQ and should be in the TCEQ Data Base.

Then please conduct a thorough investigation based on your reviews, and contact me of your findings.

Your participation in these matters is greatly needed and will be very much appreciated.

Respectfully;

Encarnacion Serna (Chon) 361-903-5774



GOVERNOR GREG ABBOTT

April 4, 2021

Mr. Encarnacion Serna
105 Lost Creek Drive
Portland, Texas 78374-1449

Dear Mr. Serna:

Thank you for taking the time to contact the Office of the Governor. We understand that you are concerned.

I am asking Toby Baker, Executive Director of the Texas Commission on Environmental Quality, for his staff's assistance in reviewing and responding both to you and this office on the information shared.

Please let us know whenever we may be of service in the future.

Sincerely,

Dede Keith
Deputy Director
Constituent Communication Division
Office of the Governor

DK:rw

My name is Encarnacion Serna. My wife Rosa and I reside at 105 Lost Creek Drive in Portland, Texas. We have lived in this home since July 1991. My telephone number is 361- 903-5774.

I request here that Instead of granting/approving the amendment request on Permit Nos. 105710/PSDTX1306M1/GHGPSDTX123M1, and after reading Cheniere's deviation reports submitted to the TCEQ for their Liquefaction Plant in Gregory/Portland, that a thorough in-depth investigation be conducted immediately by the TCEQ in conjunction with EPA and OSHA if deemed necessary, to determine if this facility is operating in compliance with the various most current air permit(s) and its amendments and with the requirements of the OSHA 1910.119 Process Safety Requirements. In addition: neither the Applicant nor the TCEQ have done comprehensive, adequate, and meaningful inspections, studies or modeling of the air in the six-miles stretch where many industrial sites all located within a six-miles stretch to determine the current condition of the air in this small space which is only six miles long. Therefore, I am also requesting that the TCEQ in conjunction with the EPA conduct such studies and modeling, before granting any more permit or amendments requests. In addition, if during this investigation serious violations are revealed whereby the health and the safety of individuals living on the adjacent communities have been affected or the condition of the air atmosphere in this six mile space is close or at non-attainment then serious consideration should be given to the revocation of existing air permit and amendments.

My property extends to the shores of Corpus Christi Bay. The Cheniere liquefaction plant infrastructure is approximately 1,500 to 2,000 feet from my property. The coordinates from fence line to fence line indicate a distance of about 1,426 feet. Therefore, the distance from my backyard property line to the flare I estimate to be between 1,500 to 2,000 feet.

I have direct access to the Bay from my home, and I can see the gigantic Cheniere flare from my backyard just a couple of thousand feet away. My family and I spend a lot of time throughout the year outside in the back yard and in my portion of the Bay, doing yard work, doing repairs to the property, fishing, kayaking and swimming. In so doing we are exposed daily to breathing High Air Pollutant's (HAP's) from combusted and non-combusted gas plumes constantly and continuously coming directly over our property from Cheniere. The Bay waters along with my backyard have been sources of recreation for years and have provided entertainment, work, and fish for my family. Now I have 10 grandchildren and in-laws and we all recreate in my backyard and the Bay. Two of my children, and one grandchild are chronic asthmatics. My wife and I are 70 years old, retired, and have serious allergy problems.

This facility's flare emissions (combusted and non-combusted HAP's), and one flare structure with its intense flame are threats and pose constant fears to our health, safety and the environment, that me, my family, and many other neighbors live with daily, and have to put up with it. It is for these concerns and fear for the health and safety of me and my family that I write the following comments, ask the questions below, and make the following requests to both the Applicant and the TCEQ based on my review of Cheniere's Deviation Reports for the years 2018, 2019, and 2020:

1. For the year 2020, I counted two hundred and ninety-three (293) deviations/violations of existing permits and amendments. Questions to the TCEQ and to Cheniere. *Is my count correct? If not, what is the correct count?* My conclusions here are: either Cheniere does not know how to operate the LPG plant, or their plant is not designed to do what Cheniere wants to do with it.

2. For the year 2020, out of the 293 deviations/violations, I counted one hundred and forty-three (143) violations on "unexpected variances in feed gas composition." These deviations/violations resulted in unauthorized emissions for NOx, VOC, and CO. My questions to the TCEQ and to Cheniere. *Is my count correct? If not, what is the correct count? What about H2S? Were there any unauthorized emissions of H2S caused by these events?* My conclusions here are: Cheniere does not know what comes into the plant as feed gas at any time, has no control over the feed composition and does not care.
3. For the year 2020, out of the 293 deviations/violations, I counted eight (8) violations on "visible flare emissions" due to VOC coming out of flare. Questions to the TCEQ and Cheniere. *Is my count correct? If not, what is the correct count?* My conclusion-Cheniere does not know how to operate the plant, and does not care what goes in the flare and what comes out of it.
4. For the year 2020, out of the 293 deviations/violations, I counted five (5) violations on "the thermal oxidizers operating below the compliance values of 1,740 degrees F and 1,400 degrees F resulting in H2S emissions not permitted. Questions to the TCEQ and Cheniere. *Is my count correct? If not, what is the correct count?* My conclusion-Cheniere does not know how to operate the thermal oxidizers and does not care about maintaining proper operating conditions on these oxidizers as required by the special condition requirements written in the permit.
5. For the year 2020, out of the 293 deviations/violations, I counted five (4) violations on "the permittee not maintaining a minimum waste gas heating value of 300 btu/scf in the flares" resulting in unpermitted amounts of several pollutants coming out of the flares. Questions to the TCEQ and Cheniere. *Is my count correct? If not, what is the correct count?* My conclusion-Cheniere does not know how to operate the flares and does not care about maintaining proper operating conditions on these flares and complying with special condition requirements written in the permit.
6. For the year 2019, I counted two hundred and forty-six (246) deviations/violations of existing permits and amendments. Questions to the TCEQ and to Cheniere. *Is my count correct? If not, what is the correct count?* My conclusions here are: either Cheniere does not know how to operate the LPG plant, or their plant is not designed to do what Cheniere wants to do with it.
7. For the year 2019, out of the 246 deviations/violations, I counted fifty-eight (58) violations on "unexpected variances in feed gas composition." These deviations/violations resulted in unauthorized emissions for NOx, VOC, and CO. My questions to the TCEQ and to Cheniere. *Is my count correct? If not, what is the correct count? What about H2S? were there any unauthorized emissions of H2S caused by these events?* My conclusions here are: Cheniere does not know what comes into the plant as feed gas at any time, has no control over the feed composition and does not care.
8. For the year 2019, out of the 246 deviations/violations, I counted fourteen (14) violations on "visible flare emissions" due to VOC coming out of flare. Questions to the TCEQ and Cheniere. *Is my count correct? If not, what is the correct count?* My conclusion: Cheniere does not know how to operate the plant, and does not care what goes in the flare and what comes out of it.
9. For the year 2019, out of the 246 deviations/violations, I counted five (4) violations on "the permittee not maintaining a minimum waste gas heating value of 300 btu/scf in the flares" resulting in unpermitted amounts of several pollutants coming out of the flares. Questions to the TCEQ and Cheniere. *Is my count correct? If not, what is the correct count?* My conclusion-Cheniere does not know how to operate the flares and does not care about maintaining

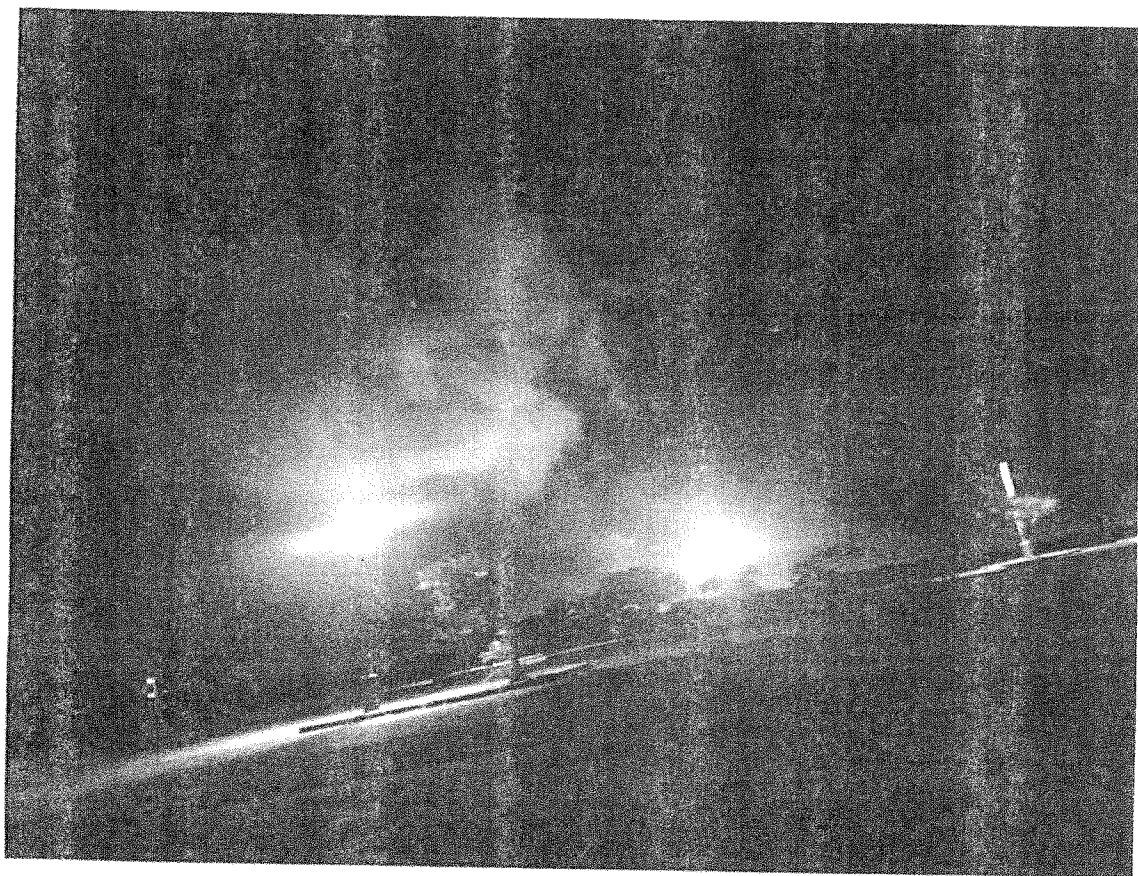
proper operating conditions on these flares and complying with special condition requirements written in the permit.

10. For the year 2019, out of the 246 deviations/violations, I counted nineteen (19) violations on "unauthorized LNG venting to the marine flare" resulting in unpermitted amounts of several pollutants coming out of the marine flare. Questions to the TCEQ and Cheniere. *Is my count correct? If not, what is the correct count?* My conclusion- Cheniere does not care and ignores permit requirements.
 11. For the year 2018, I counted one hundred and nineteen (119) deviations/violations of existing permits and amendments. Questions to the TCEQ and to Cheniere. *Is my count correct? If not, what is the correct count?* My conclusions here are: either Cheniere does not know how to operate the LPG plant, or their plant is not designed to do what Cheniere wants to do with it.
 12. There are too many other deviations/violations of the permit and its amendments: such as, the lifting of pressure relief valves resulting in unauthorized emissions and dangerous situations, submitted erroneous calculations with lower SO2 numbers than the actuals, failure to submit deviation/violation notifications on time to the TCEQ, leaks from pipes and tanks, etc., just too many and too complex to mention and to discuss in this limited space here.
- Overall conclusion. Cheniere is not a good neighbor. Cheniere is a nefarious neighbor. Cheniere does not care about the schools and neighborhoods that exist around them. Cheniere does not know how to operate their plant in an environmentally safe manner. etc-etc.

Major question to the TCEQ. Has the TCEQ, EPA, or OSHA carried out any enforcement action(s) on Cheniere's Liquefaction Plant located in Gregory/Portland? If so, what are they? If not, why not?

Major requests to the TCEQ. In conjunction with EPA and OSHA, if OSHA is needed, start an investigation on this plant immediately. Do not grant this or any other amendment to this nefarious site, but instead revoke existing permits and amendments if the investigation confirms major problems and dangers to the communities around this site.

Encarnacion Serna (Chon) 361-903-5774







My name is Encarnacion Serna. My wife Rosa and I reside at 105 Lost Creek Drive in Portland, Texas. We have lived in this home since July 1991. My telephone number is 361- 903-5774.

I am requesting a Public Meeting to be conducted in a large public building with all stake holders being present physically and a Contested Case Hearing on Air Quality Permit Amendment Application- Permit Nos. 105710/P5DTX1306M1/GHGPSDTX123M1. The applicant for this Permit is Cheniere's Corpus Christi Liquefaction, LLC Gregory, San Patricio and Nueces Counties Texas. I also request at this time that this amendment be denied and that your agency conduct a thorough in-depth investigation to determine if this facility is operating in compliance with the various most current air permit(s) and its amendments. In addition: neither the Applicant nor the TCEQ have done comprehensive, adequate, and meaningful inspections, studies or modeling of the air in the six-miles stretch where many industrial sites (all listed in this document and all located within a six-miles stretch) to determine the current condition of the air in this small space which is only six miles long. Therefore, I am also requesting that the TCEQ in conjunction with the EPA conduct such studies and modeling, before granting any more permit or amendments requests.

My property extends to the shores of Corpus Christi Bay. The Cheniere liquefaction plant infrastructure is approximately 1,500 to 2000 feet from my property. The coordinates from fence line to fence line indicate a distance of about 1,426 feet. Therefore, the distance from my backyard property line to the flare I estimate to be between 1,500 to 2,000 feet.

I have direct access to the Bay from my home, and I can see the gigantic Cheniere flare from my backyard just a couple of thousand feet away. My family and I spend a lot of time throughout the year outside in the back yard and in my portion of the Bay, doing yard work, doing repairs to the property, fishing, kayaking and swimming. In so doing we are exposed daily to breathing High Air Pollutant's (HAP's) from combusted and non-combusted gas plumes constantly and continuously coming directly over our property from Cheniere. The Bay waters along with my backyard have been sources of recreation for years and have provided entertainment work and fish for my family. Now I have 10 grandchildren and in-laws and we all recreate in my backyard and the Bay. Two of my children, and one grandchild are chronic asthmatics. My wife and I are 70 years old, retired, and have serious allergy problems.

This facility's flare emissions (combusted and -non-combusted HAP's), and one flare with its intense flame is a threat and a constant fear to our health, safety and the environment, that me, my family, and many other neighbors live in daily, and have to put up with it. It is for these concerns and fear for the health and safety of me and my family that I write the following comments, ask the questions below, and make the following requests to both The Applicant and the TCEQ:

1. Cheniere's liquefaction plant is not and has not been a good neighbor, their past responses to my concerns have gone pretty much to deaf ears on both Cheniere's part and that of the TCEQ. Among many instances and at different dates last year (I remember one period vividly it was the July to October 2020 time frame when the flame on the flare was huge) I started paying close attention to the flare size and estimated its size from the back of my house and at other times from the Northshore subdivision called Grand Estates that this flame had to be between 20 to 25 feet in length and at its widest part probably between 10 to 15 feet. It was then that I started contacting Cheniere a gentleman named Steven and a TCEQ person named Robert Lindsay, at which point I realized I was in the middle of a deceptive and elusive game and I was getting the

"run around" from both the TCEQ and Cheniere. From Cheniere I would get automated e-mail responses that went like this "Operating our facility is our top priority. We are held to a number of state, local, and federal standards and regulations, and the flaring activity you observe is consistent with our permit conditions.....We do not comment on the operational activities onsite and I would direct you to the TCEQ for the remainder of your questions." Then the person from TCEQ Region 14 would say "I will send you the link to our site so you can find out answers to your questions then the link was not the right link, so after trying to get answers for a period of about three (3) months July to October 2020 I gave up in frustration. What is still very bad is that many times after that the flare on and off continues to generate a huge yellow flame with lots of smoke and dark plumes that cover my property and that of many others.

2. In the Document titled 'AQA Report' Section 3.1 the Applicant states "As noted in the MERA Step 0, A MERA evaluation must be conducted for all chemical species whose short-term or long-term allowable emission rate will increase from any emission point number (EPN) through the project" then the Applicant claims "Carbon dioxide, ethane, methane, nitrogen, and propane are simple asphyxiants and do not require a health effects review per the TCEQ's MERA guidance document." I read the TCEQ's MERA guidance document and the document does not say that these gases carbon dioxide, ethane, methane, nitrogen, and propane are excluded from a health effects health review. Furthermore, the safety data sheets (SDS) for methane, ethane, and propane do not say that they are simple asphyxiants, but on the contrary the SDS's lists them as extremely flammable gases that may displace oxygen and cause rapid suffocation. I have attached SDS's for these gases. **Therefore, the Applicant failed to conduct this review on the mentioned gases and should have done the review.**
3. In the application summary, section 1.2 project description, The Applicant declares that since the original construction permit of September, 2014, CCL has applied for the following amendments.
 - a. February 2015- To change the natural gas fired combustion turbines from water injection to dry-low NOx technology.
 - b. March 2017- An amendment to the representation for the marine flare to authorize ground flare technology.
 - c. July 2018- An amendment to update the permit representations to reflect the as-built design of the stage I/II project.
 - d. September 2019- An amendment to install a totally enclosed ground flare was fully incorporated into the permit, to shortly afterwards declare that CCL no longer had plans to move forwards with the installation of the enclosed ground flare.
 - e. November 2020- Again, an amendment to update the permit representations to reflect the as-built design of the stage I/II project.
 - f. April 2021- Amend all previous permits 105710, PSDTX1306M1, and GHGFP5D123M1 to update flaring emissions.

The large number of amendment requests and the nature of these requests submitted by the Applicant and approved by the TCEQ in such a short operating life of this industrial site, plus the observed incredible number of occurrences and fluctuations in the size and characteristics of these flares are very strong indications of successive and staged violations to existing authorized permits and amendments. Then if you add to this evidence the numerous times that the Applicant has refused to answer specific questions addressed specifically to the occurrences and

fluctuations in the sizes and natures of these flares add strongly to the evidence that this Applicant operates with violations to permit conditions and thus outside of permit limitations and restrictions.

The TCEQ (in conjunction with the EPA) instead of approving amendment after amendment for this terrible nefarious enemy-of-the-community-neighbor, should do its job in protecting the health and safety of the public and should start an in-depth investigation that covers a period of time that goes all the way back to commissioning/start-up date of this facility. This investigation should be thorough, incisive and be conducted in a timely manner and the results of this investigation should be revealed to the Public immediately. The TCEQ should also stop immediately its historical trend and customary practices of legitimizing unauthorized emissions of pollutants, and start instead a trend of revoking existing air permits to applicants like Cheniere.

4. In the application summary, section 4, process description, page 13, The Applicant presents an incomplete process flow diagram which is almost meaningless and useless to the reader/reviewer because it does not provide, flows, compositions, temperatures and pressures for the flow streams. The Applicant needs to provide this information with the application.
5. In the application summary, section 5, emission calculations, page 14, The Applicant declares "The estimated seal leak rates are based on the compressor manufacturer's guarantee", The Applicant needs to state what these leak rates are, and conduct valid and meaningful testing at appropriate test conditions to confirm if the guaranteed rates are correct.
6. In the application summary, section 5, emission calculations, page 14, The Applicant states "For the annual NOx emission rate an estimated factor of 0.11lb/MMbtu was used to account for annual variations in the heat content of the total gases routed to the flare." Is this method and the factor approved by the TCEQ?
7. In the application summary, section 5.1, emission calculations, page 14, referring to the wet/dry flares, The Applicant states "The control efficiency for C1 to C3 compounds is 99%, and the control efficiency for other VOC's/HAP's is 98%. A constant efficiency of 98% is assumed for H2S. SO2 emissions were calculated assuming that 100% of H2S in the stream is calculated to SO2." Have all these three efficiencies been confirmed with testing, and is the assumption that all H2S gets combusted to SO2 correct? If no verification through testing has been done by The Applicant, then The Applicant needs to conduct valid and meaningful testing at appropriate test conditions to confirm these efficiencies and assumptions.
8. In the application summary, section 5, emission calculations, page 14, please explain what non-combusted CO2 is?
9. In the application summary, section 5.2, marine flare emission calculations, page 15, The Applicant proposed to increase emissions significantly by routing boil-off gas (BOG) from the LNG tanks to the marine flare during ESD maneuvers of compressors at the Sinton compressor station. The marine flare is to combust emissions during marine loading activities (ship loading) not for on shore remote compressor testing, or any other non-marine activity, therefore the TCEQ should not authorize this change.
10. In the application summary, section 5.2, emission calculations, page 15, referring to the marine flare, The Applicant states "The control efficiency for C1 to C3 compounds is 99%, and the control efficiency for other VOC's/HAP's is 98%. A constant efficiency of 98% is assumed for H2S. SO2 emissions were calculated assuming that 100% of H2S in the stream is calculated to SO2."

Have all these three efficiencies been confirmed with testing, and is the assumption that all H2S gets combusted to SO2 correct? If no verification through testing has been done by The Applicant, then The Applicant needs to conduct valid and meaningful testing at appropriate test conditions to confirm these efficiencies and assumptions.

11. In the application summary, section 5, emission calculations, The Applicant makes reference to a worst-case scenario pertaining to the marine flare where only 80% of the routed waste gas gets combusted. Is the 80% an approved numbers by the TCEQ, and how many of these events have occurred to date since plant start-up?
12. Is the Applicant currently authorized to emit 353.13 tons per year of VOC?
13. Is the Applicant currently authorized to emit 85.3 tons per year of PM?
14. Is the Applicant currently authorized to emit 85.3 tons per year of PM₁₀?
15. Is the Applicant currently authorized to emit 85.3 tons per year of PM_{2.5}?
16. Is the Applicant currently authorized to emit 3541.4 tons per year of NOx?
17. Is the Applicant currently authorized to emit 3621.774 tons per year of CO?
18. Is the Applicant currently authorized to emit 49.39 tons per year of SO₂?
19. Is the Applicant currently authorized to emit 0.31 tons per year of H₂S?
20. Is the Applicant currently authorized to emit 5,474,166 tons per year of CO₂?
21. Is the Applicant currently authorized to emit 2468.2 tons per year of CH₄?
22. Is the Applicant currently authorized to emit 20 tons per year of N₂O?
23. Is the Applicant currently authorized to emit 5,538,196 tons per year of CO_{2e}?
24. Does the Applicant have video footage on the flare (s) and thermal oxidizers?
25. Will the TCEQ request this video footage?
26. Will the Applicant submit this video footage?
27. Will the Applicant disclose to the TCEQ and the Public every and all calculations made (numbers, equations, criteria, references, assumptions, lab analysis results) pertaining to the emission calculations for H2S and SO2?

The questions below pertain to the special conditions listed on Appendix B of the document titled "Application and Summary" and requests and questions on how will the TCEQ enforce compliance and how will the Applicant demonstrate compliance with the hundreds of special conditions listed in this Appendix.

28. How will the TCEQ enforce the three conditions listed in part 4 pertaining to the natural gas fired combustion turbines?
 - a. The Concentration of NOx from EPNs: TRB1 through TRB18 shall not exceed 25 ppm.....
 - b. The Concentration of CO from EPNs: TRB1 through TRB18 shall not exceed 29 ppm.....
 - c. Planned startup or shutdown of the turbines is limited to no more than 1 hour per turbine per event.
29. Since the liquefaction plant was commissioned has the TCEQ sampled the fuel gas that is used as fuel for the turbines, the thermal oxidizers, the generators and the fire pump engines to analyze for H2S?
30. Since the liquefaction plant was commissioned has the TCEQ checked the condensate storage tank for integrity of components associated with the floating roof and its components per requirement 8 of the special conditions?

31. Since the liquefaction plant was commissioned has the TCEQ requested and checked operating logs or anything else to ensure that the carbon canister on the spent scavenger tank is in compliance with special condition 10 pertaining to VOC emissions?
32. Special permit condition No. 6 pertaining to the Acid Gas removal (AGR) whether it be directed to the thermal oxidizers or the flares (too many conditions listed here within a main condition. How will the TCEQ enforce each and every one of the conditions listed here?
33. Special permit condition No. 7 pertaining to the design and operation of the wet/dry flares and the marine flare destruction efficiencies, how will the TCEQ and the Applicant go about enforcing and demonstrating compliance with the multitudes of requirements within this big listed condition?
34. Conditions 12 through 15 pertaining to "continuous demonstration of compliance." How will the TCEQ enforce compliance with the four (4) listed conditions listed within this condition? How will the Applicant demonstrate compliance with all of these conditions?
35. Has the Applicant since the time of start-up demonstrated compliance with each and every one of the listed conditions in Appendix B?
36. Has the TCEQ at any time requested operating logs, operating records, operating procedures, maintenance records, maintenance procedures to show compliance with all conditions listed in Appendix B?
37. Has the Applicant at any time provided operating logs, operating records, operating procedures, maintenance records, maintenance procedures to show compliance with all conditions listed in Appendix B?

The TCEQ needs to determine now if San Patricio County (The County) is or is not already a non-attainment county. It is imperative that this determination be made before any air permit or permit amendment being considered now gets approved. The current number of industrial sites (Flint Hills Energy Terminal, MODA Energy terminal, Occidental Chemical chlorine plant, EDC plant, VCM plant and Cogeneration plant, Voestalpine iron plant, and Cheniere (all located within a distance of six (6) miles along the Ingleside, Ingleside on the Bay, Gregory and Portland shorelines, and Exxon /Sabic petrochemical complex less than six miles to the west) most likely have already made The County non-attainment, while the TCEQ and politicians approved and supported and continue to do so; permit and permit amendments. While in the past it had been complacent, irresponsible and stupid to have done so, it is time to stop being stupid, complacent and irresponsible, and to start acting now, and to change this trend. The TCEQ, and our elected officials need to stop this myopic and tunnel vision permissive and supportive approach towards these highly detrimental industries. Again, choosing not to effectively act now, and to wait until we find ourselves in a non-attainment situation without our regulatory agency, The TCEQ having done nothing would be totally unacceptable and stupid.

There are at the present time three (3) air permit amendments in the TCEQ system being "fast tracked" for approval by the Agency. These air permit amendments are:

- a. Cheniere - Air Permit No.105710
- b. MODA - Air Permit No.122367
- c. Flint Hills - Air Permit No. 6606

All of the three air permit amendments especially Cheniere's which is astronomical in magnitude (which is in the thousands for several HAP's and in the millions for CO2 equivalent) seek approval to increase their emissions. In the aggregate by all three, by thousands of tons per year. In the case of Cheniere and MODA These amendments seek to get the TCEQ to legitimize current HAP's emissions, that most likely are currently occurring without the authorization of past and current permit conditions, and definitely without these two applicants disclosing anything to the public.

If The County is already non-attainment, then all of the current and past air permit applications (depending on when The County became non-attainment) were or are unacceptable, inadequate, inaccurate and would be circumventing other regulations; including federal ones which would have required deeper more accurate scrutiny during their reviews. If we are already non-attainment or close to non-attainment conditions/situation in either case all current permit applications should be denied until real attainment status is determined, and if non-attainment status was reached some time ago then past applications should be revoked.

In a distance within a straight line of six (6) miles on the shoreline starting at the City of Ingleside on the Bay through Ingleside, Gregory and Portland the following is known: There are currently three industrial sites seeking air permit amendment applications, this after in the past they all have submitted litany of numerous amendment requests to change factors calculational methods, and too many other "shenanigans" to mention here, but every one of them requesting from the TCEQ permission to emit more and more HAP's. and in every case these permits have been approved by the very Agency that is supposed to be protecting the health and safety of its citizens and protecting the environment.) These sites are:

- a. Cheniere (with three (3) flares and three (3) thermal oxidizers and multitude of large vessels and land and marine equipment components and activities. With all of them together emitting thousands and thousands of HAP's.)
- b. MODA (with eight (8) VCU's or flares and multitude of large vessels and land and marine equipment components and activities. With all of them together emitting thousands and thousands of HAP's)
- c. Flint Hills (with three (3) VCU's or flares and multitude of large vessels and land and marine equipment components and activities. With Flint Hills emitting less HAP's than Cheniere or MODA, but nevertheless seeking approval to emit more and more quantities of HAP's.)

And at this time **not seeking permission for permit amendments**, but in operation and already contributing to the poisoning of the air we breathe are the following sites:

- a. Occidental chemical with its chlor-alkali plant, EDC plant, VCM plant, and cogeneration plant
- b. Dupont with its fluorocarbon plant
- c. Voestalpine with its iron ore plant
- d. And maybe others we do not know about.

The TCEQ and the Applicants failed and continue to fail in conducting a comprehensive study of the air, in these six (6) miles long stretch in our backyard areas, that takes into account all emissions of each and every HAP in the aggregate, not individually, for the total of all the listed above industrial sites to determine the cumulative effect on health and safety and to determine the actual quality/deterioration of the air caused so far by these listed industries.

Specific Questions and Requests pertaining to all emissions from Ingleside on the Bay to Portland
(The six miles stretch):

1. Will the TCEQ stop the permitting process until a determination of the air quality or lack of quality is conducted and results become available to the TCEQ and the public?
2. Will the TCEQ conduct air studies based on actual air sampling at strategic points within these six miles distance of the shoreline before proceeding with the application process for these three sites?
3. Will the TCEQ not the Applicants conduct air studies based on modeling that take into account the total of all emissions (for each and for all HAP's i.e., short term (lbs./hr.) and long term (tons/year)) from all three applicants, plus Exxon/Sabic plus from all other existing sites in this mentioned six miles space?
4. Will the TCEQ force the air permit amendment Applicants to present worst case scenarios with probabilities and consequences for these scenarios to occur and effects on the adjacent communities?
5. Will the TCEQ invite the EPA to participate in these studies?
6. Will the TCEQ invite members of the public including scientists, engineers, lawyers, health professionals and others to participate in these studies? We realize there is in existence a very absurd, exclusive, abusive, and stupid rule that excludes from participation everyone who does not live within a one-mile radius of the site, but then again everyone, but the TCEQ and unscrupulous applicants, already knows and accepts the fact that this rule is absurd, abusive and corrupt, typical of corrupt totalitarian governments, and the state of Texas of course.
7. Will the TCEQ conduct investigations of Cheniere's liquefaction plant?
8. Will the TCEQ conduct investigations of MODA's Energy Terminal?
9. Will the TCEQ conduct investigations of the Iron manufacturing plant Voestalpine?
10. Will the TCEQ include the EPA in these investigations?
11. Will the TCEQ invite members of the public including scientists, engineers, lawyers, health professionals and others to participate in these investigations?
12. Will the TCEQ force its Executive Director Toby Baker to contact Encarnacion (Chon) Serna to address all these issues and more as was asked to do by Dede Keith, Deputy Director, with the office of the Governor (letter dated April 4, 2021)?

Encarnacion Serna (Chon) 361-903-5774

To: Ilan Levine, Patrick Nye

Date: March 15, 2021

Cc. Various Other Stake Holders

Subject: MODA Air Quality NSR Permit

From: Encarnacion (Chon) Serna

No. 122362/PSDTX-1430M1 Comments

General Comments:

This permit amendment request should be denied by the TCEQ and any other regulating agency that ends up having to approve it. The introductory text on this application reveals that MODA A TERMINAL FOR HIRE will be unloading and storing gigantic volumes of sour crude, sour condensate and bunker oil, that will then be loaded into marine vehicles and tank trucks. These liquid products will be moved around with huge pumps through gigantic pipes into a total of 51 tanks some of which will be internal floating roofs (IFR) and others will be vertical fixed roofs (VFR.) Vapor spaces will be created inside these tanks as the tanks get drained and refilled during transfer, loading, and offloading activities. These vapor spaces will contain flammable and toxic gases due to the high vapor pressures of these products and their components. These vapor spaces will then be displaced/discharged to the atmosphere during some activities, and to portable and fixed flares (eight of them) referred to as VCU's. These VCU's aided with natural gas and propane will then burn the H₂S and VOC and convert them to more polluting toxic gases: CO, SO₂, PM's NO_x, CO₂ (CO₂ production which is not regulated by this permit, and therefore will not be regulated, monitored etc. in this terminal.) which will further be released to air, land, and the Corpus Christi Bay System over the cities of Ingleside on The Bay, Ingleside, Gregory, Portland and others. The rest of the submitted application (200 plus pages) do nothing for the reader or reviewer, since it is convoluted labyrinthic and does not contain the calculations themselves nor does it provide any evidence that any air modeling was done at all. In addition, there is no indication on this application that the current volumes of pollutants currently emitted by already existing industry and by other future industry soon to come to these communities has been included or accounted for.

30 TAC 116.110(f) which requires applications for air quality permits or permit amendments to be submitted under the seal of a licensed professional engineer if the capital costs of the project exceed two million dollars is in this case ridiculous, abusive, and corrupt as it applies to this situation. A permit amendment of this magnitude, of this relevance and of these potential gigantic detrimental effects on human health and safety and damage to the environment should be prepared, reviewed, analyzed, approved, signed, sealed, and dated only by professional engineers, scientists, health professionals and lawyers who currently practice their profession. The firm Edge Engineering & Science (Edge) should have done this even if the State did not require it. On the other hand, The TCEQ should make an exception to this abusive rule and demand that MODA and Edge do accordingly. If both MODA and the TCEQ are unwilling to do this, then State representatives, State Senators, and the Governor should order MODA and the TCEQ to require this process.

The one (1) mile radius rule is another tool employed frequently by the TCEQ to minimize to the point of almost elimination the participation of affected citizens. This rule is in this case again ridiculous, abusive, and corrupt as it applies to this situation. A permit amendment of this magnitude, of this relevance and

of these potential gigantic detrimental effects on human health and safety and damage to the environment should be disclosed transparently to the Public and to allow entire affected communities to participate.

There is a litany of permit/amendment requests in the short history of this terminal, to mention a few dates:

1. February 2014 (Occidental Chemical earlier permit for this terminal)
2. December 2019
3. March 2020
4. October 2020
5. January 2021

The Applicant needs to provide with the January 2021 Application a chronological listing all amendments and requests submitted to the regulating agencies including draft permits issued by the TCEQ dating all the way back to the original permits. This chronology should present in detail every calculated value for every permit and amendment; for each constituent broken down for each piece of equipment, for each activity, and for each emission category. The chronology must also present the real (measured or calculated) values of each constituent reported to the TCEQ quarterly or annually whatever the required frequency might be. This chronology must go back to the year the facility started operations.

Specific Comments:

1. On page 4 of the application's text the Applicant (MODA/Edge) state "MODA has also revised the PSD analysis from the 2019 application to reflect the above updates. this revised analysis demonstrates that PSD review also would not have been required by the as-built corrections in this application. This PSD analysis is discussed in Section 3.2 of this document. Detailed PSD review applicability calculations are included in table E-2 in Appendix E to this document." While it is true that the Applicant provides an argument in section 3.2 the argument, is vague, evasive and wordy and does not demonstrate that the as-built corrections would have not required PSD review back in 2019. Furthermore table 3-1 on page 9 does not demonstrate either that a review would not have been required. Argument 1 on this table makes an invalid comparison when it compares and subtracts November 2020 Maximum Allowable Emission rate numbers (MAERT) from the calculated proposed 2021 values. The Applicant should compare and subtract actual emitted (measured or calculated) 2020 values reported to the TCEQ and not MAERT values. MAERT numbers are not real or actual numbers but maximum numbers assigned by the TCEQ 30 TAC 116.115(b)(2)(F). In addition, the tables on appendix E; tables E-1 and E-2 present numbers from calculations, and are not the calculations themselves so they do not prove anything. The Applicant or the TCEQ should have had, and must provide the actual calculations (Excel spreadsheets, software programs, hand calculations etc.) siting assumptions made in the calculations of these numbers and stating the criteria and guidance used in these calculations. This in order for members of the public to confirm and verify the veracity and accuracy of the numbers and the conclusions made by the Applicant.
2. The switch from LHV's to HHV's by the Applicant from the 2019 application/permit to the currently proposed amendment along with other changes has to be recalculated scrutinized and analyzed, the reason being that when you use HHV's in the calculation vs. LHV's you get 11.1% more emissions for NOx and CO when you combust natural gas (primarily methane) and 8.7% more when you combust propane. Remember their eight (8) VCU's will use both of these gases

to burn the H₂S and VOC. Also they have an oil heater and we do not know at this point what will it burn to heat the bunker oil. In addition MODA might have inherited emergency generators and fire water pumps from the Occidental Chemical site which they may use and operate, which would then also have internal combustion engines that they have or are not declaring (do not know) in their application/amendments.

So here are the question pertaining to this issue alone”

- a. Why did they used LHV's previously?
 - b. What were the emission totals for NO_x CO etc. then when LHV's were used?
 - c. How close were they to the threshold limits then?
 - d. What exactly do EPA/TCEQ requires in the calculation i.e. (LHV's or HHV's)? Why is MODA “flip flopping”
 - e. What are the emission totals for NO_x CO etc. when they use HHV's ?
3. On page 15 of the application the Applicant states “The Electronic Modeling Evaluation Workbook (EMEW) for this project, which includes model options, source parameters, and operating scenarios is submitted with this application. Air Dispersion Modeling results will be provided to the TCEQ with this submittal” The Applicant or the TCEQ needs to provide to members of the public:
- a. Air Dispersion modeling results
 - b. The EMEW Workbook
 - c. The conclusions reached by the TCEQ and the Applicant on this issue.

In addition, The Applicant should conduct and “roll out the results” to the public a health effects analysis because of the nature of these proposed emissions.

4. On Appendix A page 7, The Applicant answered yes to item E. While it is true that The Applicant provided a sketch of an incomplete material balance in Appendix C, the provided sketch does not sufficiently describe to the reviewer the daily, or the monthly or the annual quantities and compositions of crude, condensate or bunker oil that it will be taking and transferring to the tanks and eventually to the loading docks. The TCEQ and the public need to know how much H₂S and other components with high vapor pressures are coming in with the crude, the condensate and the #6 bunker oil. It is essential that these numbers be presented in the application, so enforcements and regulations can take place.
5. On Appendix A page 7, The Applicant answered yes to item F. The generation of emissions as described in this application might be clear to a scientist engineer or lawyer but will not be evident to most members of the general public. The application is too convoluted too labyrinthic and confusing. Also, the process description does not explain how the facility will be operated when the maximum possible emissions are produces.
6. On Appendix A page 7, The Applicant answered yes to item H. Here again The Applicant presents numbers everywhere throughout the applications, but no calculations are provided at all.
7. On Appendix A page 8, The Applicant answered yes to item I. Here the Applicant states that a material balance (Table 2, Form 10155) is not applicable (N/A) when in fact it is **applicable and has to be provided so that The TCEQ can enforce and regulate and members of the public can know the real true emission of pollutants in their communities.**

8. On Appendix A page 8, The Applicant answered yes to item J. Here the Applicant answered yes when in fact mechanism; or emission rates, frequencies and frequency durations maintenance, standby, and start up activities (MSS) are not properly listed and explained.
9. On Appendix A page 14, The Applicant answered yes to item K and L. Here again the applicant did not provide the calculations themselves. Here again arguments without the calculations of numbers mean nothing regardless of the qualitative claims made by arguments in themselves.
10. On Appendix A page 14, The Applicant answered Yes to items on section A i.e., compliance with 40 CFR Part 60. where in the application is compliance with Kb clearly demonstrated?
11. On Appendix A page 14, The Applicant answered No to items on section B, i.e., compliance with 40 CFR Part 61. Where in the application does the Applicant demonstrate that NESHAP subparts do not apply to this application?
12. On Appendix A page 14, The Applicant answered Yes to items on section C, i.e., compliance with 40 CFR Part 63. Where in the application does the Applicant demonstrates compliance with these subparts?
13. On Appendix A page 14, The Applicant answered Yes to five of the seven items listed under the Emissions Review Section. Where in the application does the Applicant demonstrates compliance with these subparts?
14. On Appendix A page 14, The Applicant answered Yes to five of the seven items listed under the Emissions Review Section. Where in the application does the Applicant demonstrates compliance with these subparts?
15. On Appendix A page 15, The Applicant answered No to the need for a disaster review. But the answer should have been Yes. So, The TECQ or the EPA must force The Applicant to do a disaster review with a risk analysis study. It is appalling and counterintuitive and defies common sense and logic to say the least (regulation/rule or no regulation/rule to apply) that a terminal of this magnitude with capacity to store and transfer millions of gallons of flammable explosive crude, condensate, and bunker oil containing and producing other toxic and flammable gases does not want to do disaster assessments/risk analysis. The TCEQ, the local authorities and our elected officials and the public should remember the explosions that occurred in the Corpus Christi Inner harbor at the end of last year, when a crude tank in storage/transfer terminal exploded burning seven people badly, and a dredging barge hitting an underwater propane pipe and rupturing the pipe resulting in a tragic explosion that killed four people and burned six. The MODA terminal has all the characteristics as the facilities as those involved in the inner harbor with high probabilities and catastrophic consequences.
16. On Appendix A page 15, The Applicant **erroneously answered No to section B plant fuel gas facilities**. The application states in various parts including appendix C that fuel gas and propane will be used to fuel the VCU's for proper combustion of the H2S and VOC. Also mentioned in the application is the operation of an oil heater to be fueled by natural gas. The Applicant should have conducted corrections and emission calculations due to the equipment required to provide and consume this fuel gas.
17. Also, the Applicant does not mention if any additional fuel will be, or will not be used, by other equipment acquired initially by the Applicant during the purchase of the terminal from Occidental Chemical (emergency generators, fire pump engines etc. The Applicant, if it intends to operate this equipment, should have conducted corrections and emission calculations due to this equipment required to provide and consume this fuel.
18. On Appendix A page 24, Public Notice Applicability the Applicant declares **that this application is a minor permit amendment and makes the same declaration again on page 30**. If the TCEQ, local authorities and our elected officials were to accept this declaration, then no matter what

- they would do later to atone, there would be no redemptive value or action left on this world to save them.
19. On Appendix A page 25, there is an error on the first line item (VOC). The Applicant shows erroneously the project change to be 0.25 tpy rather than 12.41 tpy then also erroneously declares that notice is not required for VOC when in fact notice is required.
 20. On Appendix A page 29, The Applicant declares that no PSD review is required for any of the eight (8) constituents. For this type of application and this Applicant declarations without any calculations it is seriously and suspiciously doubtful that no review at all is required.
 21. On Appendix A page 33, The Applicant on this Impact Table declares for every one of the eight constituents that a completed "Electronics Modeling Evaluation Workbook (EMEW) is attached when in fact is not. An electronic copy be made available to the public, so members of the public can confirm and verify the veracity and accuracy of this modeling calculations.
 22. On Appendix A page 34 through 36, (BACT Tables DOCK-LO's) the Applicant states "Route to VOC control device and meet the specific control device requirements" but in different places in the application, and on figure C-1 Appendix C of the application the Applicant declares that these emissions will go directly to atmosphere. So, is there or is there not a control device for these vents?
 23. On Appendix A page 39 through 86 (BACT Tables tank emissions) the Applicant states "Products shall be limited to those which give rise to a vapor space H₂S concentration of 24 ppmv or less. Sampling to be performed annually" how does the 24 ppmv in the vapor space correlate to the H₂S in the oncoming liquid products? Why does the sampling instead of being an annual event is not every time a new product is loaded into each tank?
 24. On Appendix A page 39 through 86 (BACT Tables tank emissions) the Applicant states "if there is any standing liquid within the tank, and the tank is open to the atmosphere or ventilated." The Applicant must operate these tanks whereby if there is any standing liquid, then it should neither be open to atmosphere or ventilated.
 25. Of the fifty-one (51) tanks mentioned throughout the application which ones and how many are:
 - a. Internal Floating Roof (IFR)
 - b. External Floating Roof (EFR)
 - c. Vertical Fixed Roof (VFR)
 - d. Atmospheric Fixed Roof (describe tank vent system in this case)
 - e. Of the Floating roof ones which ones and how many are "Drain Dry" i.e., and have connections to control vapors?
 - f. What is the maximum storage capacity of each of these tanks?
 - g. What will the maximum inventories be for each of the products be: a. condensate, b. crude, c. and bunker oil?
 26. What mechanical integrity inspection/repair program exists for all of these 51 tanks i.e., especially on the tank seals?
 - a. How often will the tanks be inspected?
 - b. What does the inspection consist of?
 - c. What will the criteria be for shutting the tanks down to repair or to replace the damaged seals?

Encarnación (Chon) Serna (361-903-5774)

Encarnacion serna
105 Lost Creek drive
Portland Texas 98374

Debbie Zachary

NSR
123404

From: PUBCOMMENT-OCC
Sent: Monday, July 25, 2022 9:51 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: Cheniere is not a good Neighbor Cheniere Cheats Again in the Air Permitting Process (Air Permit Amendment Request 105710 and PSDTX1306M1)

From: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Sent: Monday, July 25, 2022 8:36 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Fwd: Cheniere is not a good Neighbor Cheniere Cheats Again in the Air Permitting Process (Air Permit Amendment Request 105710 and PSDTX1306M1)

Sent from my iPhone

Begin forwarded message:

From: Encarnacion Serma <cacheton1@twc.com>
Date: July 23, 2022 at 9:05:06 AM CDT
To: schapa2@bloomberg.net
Cc: collete.walls@cheniere.com, Brad Patterson <Brad.Patterson@tceq.texas.gov>, Kelly Ruble <kelly.ruble@tceq.texas.gov>, bp120380@gmail.com, "Patrick A. Nye" <patrick@nyexp.us>, Jennifer Hilliard <hilliard007@gmail.com>, Kathryn Masten <kathrynmasten@yahoo.com>, Errol Summerlin <summerline@verizon.net>, Tori Young <tyoung@edf.org>, Brandon Marks <brandon@texasenvironment.org>, Elida Castillo <ecastillo@lcv.org>, chloe@texasenvironment.com, "Volcovici, Valerie (Reuters)" <valerie.volcovici@thomsonreuters.com>, Julie Dermansky <jsdart@mac.com>, cathy.skurow@portlandtx.com, rwright@portlandtx.com, garcia.david@epa.gov, "Magee, Melanie" <Magee.Melanie@epa.gov>, "Maguire, Charles" <maguire.charles@epa.gov>
Subject: FW: Cheniere is not a good Neighbor Cheniere Cheats Again in the Air Permitting Process (Air Permit Amendment Request 105710 and PSDTX1306M1)

Dear Sergio: I want you to read the e-mail which I previously sent before. And I would like for you to write three articles pertaining to the contents of this e-mail and to the June 30th meeting (which you yourself attended and observed for the duration of the meeting) that was held here in Portland on the Cheniere Air Permit Amendment:

1. Article 1 should be about the structure and the format of the TCEQ held public meetings.
2. Article 2 should be about the questions and comments made by the protestants and about the answers and comments that the Applicant and the TCEQ provided to the Public/Protestants
3. Article 3 should be about the NESHAP rule that is on "Hold" on "Stay" whatever you may call it pertaining to the curbing of carcinogens emitted by gas fueled turbines.

We are not interested in just blogs, face book, twitter blogs, comments etc. We expect the articles should be objective, unbiased, fair (fair to the Public, fair to the Applicant, and fair to the TCEQ.) The contents of your articles should be incisive and truthful. They should be based on my comments written on my previous e-mail below; but just as important they should be based on your own

investigations and your confirmations of what I wrote below and what the Public, the TCEQ and the Applicant said and stated during the June 30th meeting.

Respectfully;

Encarnacion Serna (Chon)

From: Encarnacion Serma <cacheton1@twc.com>

Sent: Monday, July 18, 2022 10:25 AM

To: 'brad.patterson@tceq.texas.gov' <brad.patterson@tceq.texas.gov>; 'collete.walls@cheniere.com' <collete.walls@cheniere.com>; 'Kelly Ruble' <kelly.ruble@tceq.texas.gov>; 'tonya.baer@tceq.texas.gov' <tonya.baer@tceq.texas.gov>; 'Eli Martinez' <Eli.Martinez@tceq.texas.gov>; 'garcia.david@epa.gov' <garcia.david@epa.gov>; 'magee.melanie@epa.gov' <magee.melanie@epa.gov>;

'wilson.aimee@epa.gov' <wilson.aimee@epa.gov>

Cc: 'Errol Summerlin' <summerline@verizon.net>; 'Sally Farris' <s.farris@att.net>;

'colincox@environmentalintegrity.org' <colincox@environmentalintegrity.org>; 'Ilan Levin'

<ilevin@environmentalintegrity.org>; 'Patrick A. Nye' <patrick@nyexp.us>; 'Jennifer Hilliard'

<hilliard007@gmail.com>; 'Kathryn Masten' <kathrynmasten@yahoo.com>;

'cathy.skurow@portlandtx.com' <cathy.skurow@portlandtx.com>; 'rwright@portlandtx.com'

<rwright@portlandtx.com>; 'County Judge Barbara Canales' <Barbara.Canales@nuecesco.com>;

'david.krebs@co.san-patricio.tx.us' <david.krebs@co.san-patricio.tx.us>;

'judith.zaffirini@senate.texas.gov' <judith.zaffirini@senate.texas.gov>;

'beverly.moore@house.texas.gov' <beverly.moore@house.texas.gov>; 'Volcovici, Valerie (Reuters)'

<valerie.volcovici@thomsonreuters.com>; 'schapa2@bloomberg.net' <schapa2@bloomberg.net>;

'Maguire, Charles' <maguire.charles@epa.gov>; 'Copano Texian' <copanotexian@gmail.com>; 'Elida

Castillo' <ecastillo@lcv.org>; 'chloe@texasenvironment.com' <chloe@texasenvironment.com>;

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<ltshadow@gmail.com>; 'James Klein' <jklein3@delmar.edu>; 'Teresa Klein' <terklein@gmail.com>;

'Cathy Fulton' <mcf4040@hotmail.com>; 'james@kinglandwater.com' <james@kinglandwater.com>;

'tammy@kinglandwater.com' <tammy@kinglandwater.com>; 'Eduardo Canales'

<ecsouthtexashumanrights@gmail.com>; 'Robin Schneider' <robin@texasenvironment.org>;

'donnaleehoffman@gmail.com' <donnaleehoffman@gmail.com>; 'jeffrey@texasenvironment.com'

<jeffrey@texasenvironment.com>; 'discountcomprepairsW@gmail.com'

<discountcomprepairsW@gmail.com>; 'Brandon Marks' <brandon@texasenvironment.org>; 'Tori

Young' <tyoung@edf.org>; 'city.hall@gregorytx.com' <city.hall@gregorytx.com>; 'Sylvia Campos'

<camposylvia87@gmail.com>

Subject: Cheniere is not a good Neighbor Cheniere Cheats Again in the Air Permitting Process (Air Permit Amendment Request 105710 and PSDTX1306M1)

Dear recipients of this e-mail: **Cheniere and TCEQ Officials have failed us again in this Sham/Rigged permitting process. Please read Cheat Counts below:**

Cheat Count No. 1

The Public Meeting held on June 30th 2022 in Portland Texas was as usual a failure in structure and format. This Sham/Rigged meeting mechanics went like this:

- a. First segment- a commercial by the Applicant to indicate how good the Applicant is, **but nothing of substance pertaining to the content of the actual permit itself got mentioned.**
- b. Second segment – a question an answer segment where the public i.e. the Protestants get to ask questions and the Applicant and the TCEQ Officials get to answer the questions, **but this was informal and it does not count.**
- c. Third Segment – a question and comment session that is official; where each member of the public gets three (3) minutes to comment and to ask questions pertaining to the permit request, **but in this segment the Applicant and the TCEQ Officials were not required to comment or to answer questions.**

Dear Senator Judith Zaffirini and State Representative J.M. Lozano: ***Can you request Greg Abbott and the Legislature to change this public meeting format. The structure and the format of these public meetings smells really bad; it smells like human waste, kind of like the way corruption smells.*** This change would be very simple to do i.e., eliminate segment 1 altogether from the currently “rigged” format, and make segment 2 count, i.e. make it official.

Cheat Count No. 2

During the Public Meeting held on June 30th 2022 in Portland Texas, there were multitude of very significant and appropriate comments and questions addressed to both Cheniere and TCEQ Officials; a good majority of them directly related and addressed to technical issues such as:

- a. Operating and permitted conditions under which the gigantic flare operates and spews fire and emissions on our neighborhoods.
- b. Questions on the requested increases of emission numbers of air pollutants and greenhouse gases.
- c. Questions pertaining as to why the litany of so many amendments in the short life of this operating facility.
- d. Questions pertaining to the large number of deviation/violations of this facility in such a short time.
- e. Questions pertaining to investigations and enforcement actions.
- f. Many questions addressing why Cheniere is more interested in providing trinkets to the public instead of doing the right thing.
- g. Many others too many to list them all here.

TCEQ and Cheniere did not answer any of the very important and significant questions made by the public; nor did they address any of the important comments; nor did they commit to anything. **It was a waste of people's valuable time.**

Elected Officials, City Administrators, EPA Officials: ***Please make the TCEQ and the Applicants bring personnel who can answer the questions and can make formal and official commitments, otherwise we are there in these big hallways wasting utilities and people's valuable times, and please let the TCEQ Commissioners and Greg Abbott know that he is operating a failed Agency.***

Cheat Count No. 3

We became aware after the Public Meeting held on June 30th 2022 in Portland Texas, that Cheniere at very high levels in their organization is trying to coerce or corrupt or beg (whatever the intention or the method might be) the Biden administration and the EPA at its highest level. This nefarious action of coercion, begging or corruption (whatever someone wants to call it) has to do with Cheniere trying to

circumvent a rule under the National Emission Standards for Hazardous Pollutants (NESHAP) which imposes curbs on emissions of known carcinogens like formaldehyde, benzene and other aromatics. Sources tell us this NESHAP rule was passed in 2004 but was put "On Hold, or On Stay" for eighteen (18) years so polluters did not have to comply for 18 years. And so the "hold or the stay" will have to be lifted in August of this year. Cheniere at this point will have to comply with this rule which will apply to the operational load, the maintenance, and the design of sixty two (62) gas fired turbines that it owns and operates throughout the US. And so because Cheniere does not want to make the retrofits/modifications or replacements necessary to comply, they opted to attempt to corrupt or coerce the Biden Administration and the EPA to continue the "Hold" on this rule or to get the EPA to give them an exclusive exemption to this NESHAP Rule. If this rule goes in effect, Cheniere claims they cannot make President Biden's promise good on delivering LNG to Europe, and thus Ukraine will fall and Europe will cease to exist!! **Really?**

Of the 62 gas fired turbines Cheniere's Gregory Portland LNG plant has eighteen (18) on this site. This according to the latest application for the air permit amendment are GE LM2500+G4 DLE. We also learned after the Public Meeting held on June 30th 2022 in Portland Texas, that Cheniere intends to install seven (7) more trains in addition to the three (3) they already operate. **Cheniere is not a good neighbor, Cheniere is Nefarious, Cheniere does not act in good faith.** Nothing has been said, mentioned or written throughout this and during previous permitting processes for this site pertaining to current emissions from these 18 turbines, and the attempt by Cheniere to **Cheat** at higher levels in trying to avoid the NESHAP Rule. And certainly nothing was said or mentioned during the June 30th, 2022 public meeting.

Cheat Count No. 3 is a huge concern. The siting, construction and operation of The Gregory/Portland LNG Plant is the worst I have seen in my 40 plus career as an engineer. There are shopping centers, living communities and schools located within a six (6) mile radius of the LNG Plant. There is an elementary school, a senior citizen living community, and at least four living communities located less than a mile away from this plant. **One can only conclude that the siting and construction of this plant was done and approved by unscrupulous corrupt lunatics; or perhaps just ignorant Lunatics. Or maybe it was just Evil Impresarios who "Do Not Give a Damn."**

Dear Ms. Collete Walls: Please forward this e-mail upwards to your operations and maintenance people and your CFO and CEO. I do not have their names, their phone numbers, nor do I have their e-mail addresses, otherwise I would do it myself.

Dear TCEQ Officials: Please forward this e-mail upwards to Toby Baker and the three commissioners. I do not have their phone numbers, nor do I have their e-mail addresses, otherwise I would do it myself.

Dear EPA Officials: Please forward this e-mail upwards to Dr. Earthea Nance and to Mr. Michael Regan. I do not have their phone numbers, nor do I have their e-mail addresses, otherwise I would do it myself.

Dear Elected Officials: Please forward this e-mail upwards to Greg Abbott. I do not have his phone number, nor do I have his e-mail addresses, otherwise I would do it myself.

Dear Ms. Collette Walls, TCEQ Officials and EPA Officials: Please let us have a meaningful good faith, non-orchestrated not-rigged "Sit Down Meeting" with our concerned organizations that know what is going on, with the affected communities of Gregory, Portland, Taft and the Inglesides, to discuss the issues of the 18 GE turbines and the carcinogens, and Cheniere's attempt to circumvent the NESHAP Rule (and by the way we do not need policemen at this meeting, because if we all act in good faith we do not need to tie-up this important and necessary force/resource) This "Sit Down Meeting" will have a threefold objective:

1. TCEQ and Cheniere could and should answer all the questions that they did not answer on the June 30th meeting; and;
2. TCEQ, Cheniere and EPA: could and should answer the following questions.

- a. What are the emission rates (lbs./MMBtus) for formaldehyde, benzene, and other aromatics like toluene from the 18 GE LM2500+G4 DLE turbines?
 - b. What are the load rates (MMBtus/hr.) i.e. operational ranges for these 18 GE LM2500+G4 DLE turbines?
 - c. How many tons of formaldehyde, benzene and the other aromatics have people (including children, women and senior citizens) who live, go to school, or work in the communities mentioned above have inhaled since 2018?
 - d. Are there other drivers that can be used to replace these drivers (the GE LM2500+G4 DLE turbines) i.e. are there other turbines with lower emission rates or perhaps better, electric motors that can replace these gas fired GE turbines?
 - e. For the 7 additional trains being considered in your current financial planning, is it going to be an additional forty two (42) GE LM2500+G4 DLE turbines?
3. EPA and TCEQ could and should explain in this "Sit Down Meeting" what is going on with this NESHAP Rule and Cheniere's attempt to circumvent this rule?

Respectfully;

Encarnacion Serna (Chon) 361-903-5774

NSR
123404

Debbie Zachary

From: PUBCOMMENT-OCC
Sent: Wednesday, July 20, 2022 1:23 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: Cheniere is not a good Neighbor Cheniere Cheats Again in the Air Permitting Process (Air Permit Amendment Request 105710 and PSDTX1306M1)

From: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Sent: Monday, July 18, 2022 11:04 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Fwd: Cheniere is not a good Neighbor Cheniere Cheats Again in the Air Permitting Process (Air Permit Amendment Request 105710 and PSDTX1306M1)

Sent from my iPhone

Begin forwarded message:

From: Encarnacion Serma <cacheton1@twc.com>
Date: July 18, 2022 at 9:24:54 AM MDT
To: Brad Patterson <Brad.Patterson@tceq.texas.gov>, collete.walls@cheniere.com, Kelly Ruble <kelly.ruble@tceq.texas.gov>, Tonya Baer <Tonya.Baer@tceq.texas.gov>, Eli Martinez <Eli.Martinez@tceq.texas.gov>, garcia.david@epa.gov, magee.melanie@epa.gov, wilson.aimee@epa.gov
Cc: Errol Summerlin <summerline@verizon.net>, Sally Farris <s.farris@att.net>, colincox@environmentalintegrity.org, Ilan Levin <ilevin@environmentalintegrity.org>, "Patrick A. Nye" <patrick@nyexp.us>, Jennifer Hilliard <hilliard007@gmail.com>, Kathryn Masten <kathrynmasten@yahoo.com>, cathy.skurow@portlandtx.com, rwright@portlandtx.com, County Judge Barbara Canales <Barbara.Canales@nuecesco.com>, david.krebs@co.san-patricio.tx.us, judith.zaffirini@senate.texas.gov, beverly.moore@house.texas.gov, "Volcovici, Valerie (Reuters)" <valerie.volcovici@thomsonreuters.com>, schapa2@bloomberg.net, "Maguire, Charles" <maguire.charles@epa.gov>, Copano Texian <copanotexian@gmail.com>, Elida Castillo <ecastillo@lcv.org>, chloe@texasenvironment.com, rachelcab@hotmail.com, bp120380@gmail.com, papabear@papabearfabrication.com, Craig & Pam Wadham <wadhamc@netscape.net>, Richard Roark <raroark0426@gmail.com>, royleeiob@gmail.com, uneedalaitinen@gmail.com, discountcomp repairsW@gmail.com, almouiemd@gmail.com, Julie Dermansky <jsdart@mac.com>, tim@raubs.com, sailboatx@icloud.com, sschwertner@yahoo.co, sheila_walton1@yahoo.com, Armon Alex <armon.alex101@gmail.com>, Love Sanchez <lsanchez33361@yahoo.com>, mzamora1818@yahoo.com, Pat & Connie Amsden <amsdentx@yahoo.com>, cmatern@g-pisd.org, sailboatx@icloud.com, Isabel Araiza <isabel.araiza.ortiz@gmail.com>, ltshadow@gmail.com, James Klein <jklein3@delmar.edu>, Teresa Klein <terklein@gmail.com>, Cathy Fulton <mcf4040@hotmail.com>, james@kinglandwater.com, tammy@kinglandwater.com, Eduardo Canales <ecsouthtexas humanrights@gmail.com>, Robin Schneider <robin@texasenvironment.org>, donnaleehoffman@gmail.com, jeffrey@texasenvironment.com, discountcomp repairsW@gmail.com, Brandon Marks <brandon@texasenvironment.org>, Tori Young <tyoung@edf.org>, city.hali@gregorytx.com, Sylvia Campos <campososylvia87@gmail.com>

Subject: Cheniere is not a good Neighbor Cheniere Cheats Again in the Air Permitting Process (Air Permit Amendment Request 105710 and PSDTX1306M1)

Dear recipients of this e-mail: **Cheniere and TCEQ Officials have failed us again in this Sham/Rigged permitting process. Please read Cheat Counts below:**

Cheat Count No. 1

The Public Meeting held on June 30th 2022 in Portland Texas was as usual a failure in structure and format. This Sham/Rigged meeting mechanics went like this:

- a. First segment- a commercial by the Applicant to indicate how good the Applicant is, but nothing of substance pertaining to the content of the actual permit itself got mentioned.
- b. Second segment – a question and answer segment where the public i.e. the Protestants get to ask questions and the Applicant and the TCEQ Officials get to answer the questions, but this was informal and it does not count.
- c. Third Segment – a question and comment session that is official; where each member of the public gets three (3) minutes to comment and to ask questions pertaining to the permit request, but in this segment the Applicant and the TCEQ Officials were not required to comment or to answer questions.

Dear Senator Judith Zaffirini and State Representative J.M. Lozano: *Can you request Greg Abbott and the Legislature to change this public meeting format. The structure and the format of these public meetings smells really bad; it smells like human waste, kind of like the way corruption smells.* This change would be very simple to do i.e., eliminate segment 1 altogether from the currently “rigged” format, and make segment 2 count, i.e. make it official.

Cheat Count No. 2

During the Public Meeting held on June 30th 2022 in Portland Texas, there were multitude of very significant and appropriate comments and questions addressed to both Cheniere and TCEQ Officials; a good majority of them directly related and addressed to technical issues such as:

- a. Operating and permitted conditions under which the gigantic flare operates and spews fire and emissions on our neighborhoods.
- b. Questions on the requested increases of emission numbers of air pollutants and greenhouse gases.
- c. Questions pertaining as to why the litany of so many amendments in the short life of this operating facility.
- d. Questions pertaining to the large number of deviation/violations of this facility in such a short time.
- e. Questions pertaining to investigations and enforcement actions.
- f. Many questions addressing why Cheniere is more interested in providing trinkets to the public instead of doing the right thing.
- g. Many others too many to list them all here.

TCEQ and Cheniere did not answer any of the very important and significant questions made by the public; nor did they address any of the important comments; nor did they commit to anything. It was a waste of people's valuable time.

Elected Officials, City Administrators, EPA Officials: *Please make the TCEQ and the Applicants bring personnel who can answer the questions and can make formal and official commitments, otherwise we are there in these big hallways wasting utilities and people's valuable times, and please let the TCEQ Commissioners and Greg Abbott know that he is operating a failed Agency.*

Cheat Count No. 3

We became aware after the Public Meeting held on June 30th 2022 in Portland Texas, that Cheniere at very high levels in their organization is trying to coerce or corrupt or beg (whatever the intention or the method might be) the Biden administration and the EPA at its highest level. This nefarious action of coercion, begging or corruption (whatever someone wants to call it) has to do with Cheniere trying to circumvent a rule under the National Emission Standards for Hazardous Pollutants (NESHAP) which imposes curbs on emissions of known carcinogens like formaldehyde, benzene and other aromatics. Sources tell us this NESHAP rule was passed in 2004 but was put "On Hold, or On Stay" for eighteen (18) years so polluters did not have to comply for 18 years. And so the "hold or the stay" will have to be lifted in August of this year. Cheniere at this point will have to comply with this rule which will apply to the operational load, the maintenance, and the design of sixty two (62) gas fired turbines that it owns and operates throughout the US. And so because Cheniere does not want to make the retrofits/modifications or replacements necessary to comply, they opted to attempt to corrupt or coerce the Biden Administration and the EPA to continue the "Hold" on this rule or to get the EPA to give them an exclusive exemption to this NESHAP Rule. If this rule goes in effect, Cheniere claims they cannot make President Biden's promise good on delivering LNG to Europe, and thus Ukraine will fall and Europe will cease to exist!! Really?

Of the 62 gas fired turbines Cheniere's Gregory Portland LNG plant has eighteen (18) on this site. This according to the latest application for the air permit amendment are GE LM2500+G4 DLE. We also learned after the Public Meeting held on June 30th 2022 in Portland Texas, that Cheniere intends to install seven (7) more trains in addition to the three (3) they already operate. Cheniere is not a good neighbor, Cheniere is Nefarious, Cheniere does not act in good faith. Nothing has been said, mentioned or written throughout this and during previous permitting processes for this site pertaining to current emissions from these 18 turbines, and the attempt by Cheniere to Cheat at higher levels in trying to avoid the NESHAP Rule. And certainly nothing was said or mentioned during the June 30th, 2022 public meeting.

Cheat Count No. 3 is a huge concern. The siting, construction and operation of The Gregory/Portland LNG Plant is the worst I have seen in my 40 plus career as an engineer. There are shopping centers, living communities and schools located within a six (6) mile radius of the LNG Plant. There is an elementary school, a senior citizen living community, and at least four living communities located less than a mile away from this plant. One can only conclude that the siting and construction of this plant was done and approved by unscrupulous corrupt lunatics; or perhaps just ignorant Lunatics. Or maybe it was just Evil Impresarios who "Do Not Give a Damn."

Dear Ms. Collette Walls: Please forward this e-mail upwards to your operations and maintenance people and your CFO and CEO. I do not have their names, their phone numbers, nor do I have their e-mail addresses, otherwise I would do it myself.

Dear TCEQ Officials: Please forward this e-mail upwards to Toby Baker and the three commissioners. I do not have their phone numbers, nor do I have their e-mail addresses, otherwise I would do it myself.

Dear EPA Officials: Please forward this e-mail upwards to Dr. Earthea Nance and to Mr. Michael Regan. I do not have their phone numbers, nor do I have their e-mail addresses, otherwise I would do it myself.

Dear Elected Officials: Please forward this e-mail upwards to Greg Abbott. I do not have his phone number, nor do I have his e-mail addresses, otherwise I would do it myself.

Dear Ms. Collette Walls, TCEQ Officials and EPA Officials: Please let us have a meaningful good faith, non-orchestrated not-rigged "Sit Down Meeting" with our concerned organizations that know what is going on, with the affected communities of Gregory, Portland, Taft and the Inglesides, to discuss the issues of the 18 GE turbines and the carcinogens, and Cheniere's attempt to circumvent the NESHAP Rule (and by the way we do not need policemen at this meeting, because if we all act in good faith we

do not need to tie-up this important and necessary force/resource) This “Sit Down Meeting” will have a threefold objective:

1. TCEQ and Cheniere could and should answer all the questions that they did not answer on the June 30th meeting; and;
2. TCEQ, Cheniere and EPA: could and should answer the following questions.
 - a. What are the emission rates (lbs./MMBtus) for formaldehyde, benzene, and other aromatics like toluene from the 18 GE LM2500+G4 DLE turbines?
 - b. What are the load rates (MMBtus/hr.) i.e. operational ranges for these 18 GE LM2500+G4 DLE turbines?
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 - e. For the 7 additional trains being considered in your current financial planning, is it going to be an additional forty two (42) GE LM2500+G4 DLE turbines?
3. EPA and TCEQ could and should explain in this “Sit Down Meeting” what is going on with this NESHAP Rule and Cheniere’s attempt to circumvent this rule?

Respectfully;

Encarnacion Serna (Chon) 361-903-5774

Debbie Zachary

From: PUBCOMMENT-OCC
Sent: Tuesday, July 12, 2022 12:15 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: Email address, Sergio chapa twitter
Attachments: Screenshot_20220709-185338-957.png; Screenshot_20220709-185357.png

From: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Sent: Monday, July 11, 2022 7:54 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: Email address, Sergio chapa twitter

From: Encarnacion Serma <cacheton1@twc.com>
Sent: Sunday, July 10, 2022 7:20 AM
To: cathy.skurow@portlandtx.com; rwright@portlandtx.com; 'Bill Wilson' <bill.wilson@portlandtx.gov>; 'Thomas Yardley' <tom.yardley@portlandtx.gov>; 'Troy Bethel' <troy.bethel@portlandtx.gov>; 'John Green' <john.green@portlandtx.gov>; 'John Sutton' <john.sutton@portlandtx.gov>; gary.w.moore@portlandtx.com; collete.walls@cheniere.com; Brad Patterson <Brad.Patterson@tceq.texas.gov>; Kelly Ruble <kelly.ruble@tceq.texas.gov>; Eli Martinez <Eli.Martinez@tceq.texas.gov>; magee.melanie@epa.gov; garcia.david@epa.gov; rwright@portlandtx.com
Cc: beverly.moore@house.texas.gov; judith.zaffirini@senate.texas.gov; 'County Judge Barbara Canales' <Barbara.Canales@nuecesco.com>; colincox@environmentalintegrity.org; 'Ilan Levin' <ilevin@environmentalintegrity.org>; 'Errol Summerlin' <summerline@verizon.net>; 'Sally Farris' <s.farris@att.net>; 'Volcovici, Valerie (Reuters)' <valerie.volcovici@thomsonreuters.com>; 'Julie Dermansky' <jsdart@mac.com>
Subject: FW: Email address, Sergio chapa twitter

Dear Brad Patterson, Mayor Cathy Skurow, City Manager Randy Wright, and everybody else.

Here are the pictures for you to see.

Have a good day.

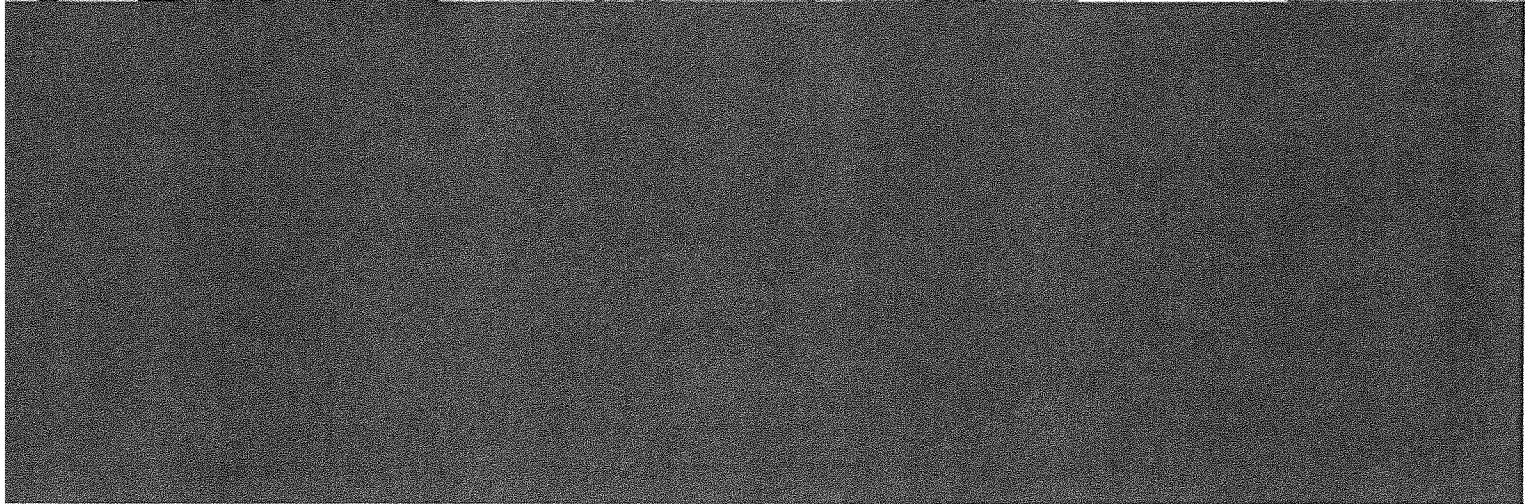
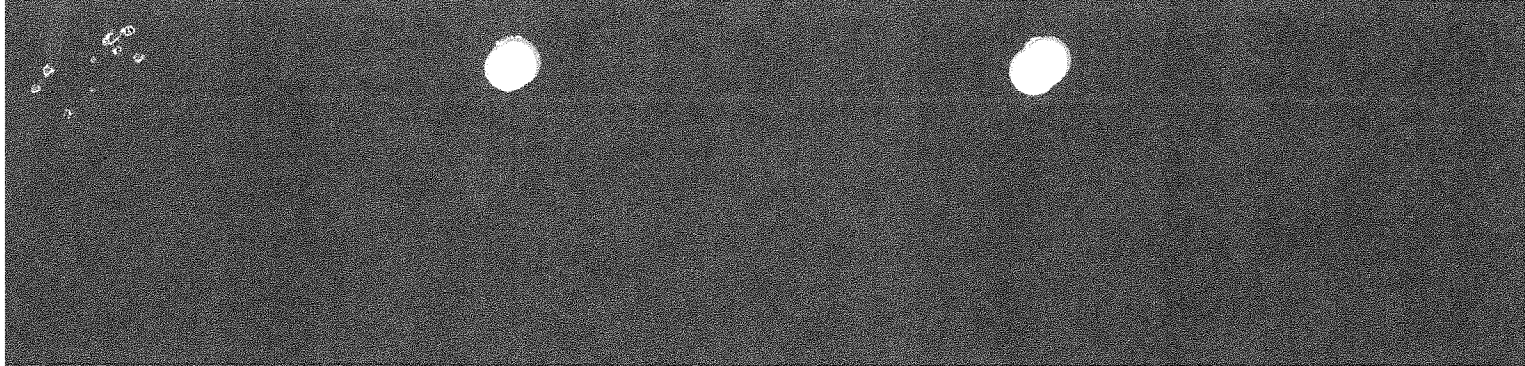
Encarnacion Serna (Chon) 361-903-5774

From: Blanca P <bp120380@gmail.com>
Sent: Saturday, July 9, 2022 6:58 PM
To: Encarnacion Serma <cacheton1@twc.com>
Subject: Email address, Sergio chapa twitter

brad.patterson@tceq.texas.gov

If you click on this twitter link, it will take you to the post. You can expand the pictures. I attached the one of the cops.

<https://mobile.twitter.com/SergioChapa/status/1542662114187382786/photo/1>





Sergio Chapa ✓ @SergioChapa · Jun 30



Two police officers are in the back



NSR
123404

Debbie Zachary

From: PUBCOMMENT-OCC
Sent: Tuesday, July 12, 2022 12:14 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: Brad Patterson's (TCEQ) Briefing to TCEQ and Cheniere Officials During the June 30 th. 2022 Public Meeting

From: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Sent: Monday, July 11, 2022 7:53 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: Brad Patterson's (TCEQ) Briefing to TCEQ and Cheniere Officials During the June 30 th. 2022 Public Meeting

From: Encarnacion Serma <cacheton1@twc.com>
Sent: Saturday, July 9, 2022 9:41 PM
To: cathy.skurow@portlandtx.com; rwright@portlandtx.com; 'Bill Wilson' <bill.wilson@portlandtx.gov>; 'Troy Bethel' <troy.bethel@portlandtx.gov>; 'Thomas Yardley' <tom.yardley@portlandtx.gov>; 'John Sutton' <john.sutton@portlandtx.gov>; 'John Green' <john.green@portlandtx.gov>; 'Gary Moore' <gary.moore@portlandtx.gov>; collete.walls@cheniere.com; Kelly Ruble <kelly.ruble@tceq.texas.gov>; Eli Martinez <Eli.Martinez@tceq.texas.gov>; garcia.david@epa.gov; magee.melanie@epa.gov; Brad Patterson <Brad.Patterson@tceq.texas.gov>
Cc: 'County Judge Barbara Canales' <Barbara.Canales@nuecesco.com>; beverly.moore@house.texas.gov; judith.zaffirini@senate.texas.gov; 'Errol Summerlin' <summerline@verizon.net>; 'Sally Farris' <s.farris@att.net>; colincox@environmentalintegrity.org; 'Ilan Levin' <ilevin@environmentalintegrity.org>; 'Maguire, Charles' <maguire.charles@epa.gov>
Subject: Brad Patterson's (TCEQ) Briefing to TCEQ and Cheniere Officials During the June 30 th. 2022 Public Meeting

We are aware that a briefing conversation took place prior to the start of the above mentioned Public Meeting. This conversation was between Brad Patterson (TCEQ) and officials from Cheniere, other TCEQ officials and some individuals who later positioned themselves on the corners of the room where the official meeting took place. The briefing conversation went like this:

Brad Patterson said "Let me handle; if it gets out of hand, I will squash that, and I can order breaks. You all do not do anything." Then Brad asked "are there plenty of uniforms?" then a voice from the back answered saying "Yes" Then Brad said "that always helps as well"

Dear Mayor Cathy Skurow and dear City Manager: *Prior to this meeting did TCEQ or Cheniere asked for police presence for this meeting?*

Dear Colette Walls: *Prior to this meeting did Cheniere asked for police presence for this meeting?*

Dear EPA Officers Mr. David Garcia and Melanie Magee: *What is your advice for this type of situations?*

We did notice the presence of at least two uniformed policemen. I do not know if under-covered policemen were there or not.

Dear Brad Patterson, one has to ask: *Were the policemen there to protect Cheniere and the TCEQ from the young smart and well informed young people or from the disillusioned and injured senior citizens of Portland and other neighboring communities who were there to protest and to ask honest appropriate questions addressing Cheniere's air permit amendment ? Or were the policemen there to intimidate participants in the protest and the fair questioning that was going on?*

Next time we have a public meeting like this, we want to participate in the briefings also; and to participate on anything that happens prior to the start of the official meeting.

And really and honestly we the concerned affected communities are the ones that need police protection from the Cheniere's flares, their internal combustion turbines and their bad maintenance and operational activities.

Have a good day and please provide us with good answers.

Respectfully;

Encarnacion Serna (Chon) 361-903-5774

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Friday, July 9, 2021 12:40 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

PM
H

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Friday, July 9, 2021 9:54 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Abel Serrata <Abel.Serrata.420648637@p2a.co>
Sent: Thursday, July 8, 2021 4:26 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Abel Serrata
2605 Terrace St
Corpus Christi, TX 78404 ▪

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Wednesday, July 14, 2021 8:32 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

PM
H

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Tuesday, July 13, 2021 10:15 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Susan Westbrook <Susan.Westbrook.427870994@p2a.co>
Sent: Tuesday, July 13, 2021 8:49 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Susan Westbrook
4810 Waltham Dr
Corpus Christi, TX 78411

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Wednesday, July 14, 2021 8:31 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

PM
H

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Tuesday, July 13, 2021 10:16 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

From: Wanda Wilson <Wanda.Wilson.465980954@p2a.co>
Sent: Tuesday, July 13, 2021 8:44 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Re: TCEQ Permit No. 105710 (Corpus Christi Liquefaction Air Permit)

To Whom It May Concern:

I am writing today because I am deeply concerned about allowing more toxic emissions from Corpus Christi Liquefaction (a.k.a. Cheniere LNG). If approved, this permit would allow even more carbon monoxide, hydrogen sulfide, nitrogen oxides, volatile organic compounds, and sulfur dioxide to be released into our air. The massive flare at this facility can be seen from quite a distance, often with associated smoke (which is a sign the toxic emissions are not being handled properly). By the company's own admission, it already can't properly regulate the amount of pollutants currently allowed, so it's just applying to increase its emissions instead. This is not in the public interest.

I formally request a public meeting on this permit. Furthermore, I also formally request a contested case hearing in order to allow impartial judges to weigh the facts on this facility.

I look forward to your response.

Regards,
Wanda Wilson
7622 Clearbrook Dr
Corpus Christi, TX 78413 ▪