

TCEQ Interoffice Memorandum

To: Mary Smith, General Counsel

Thru: *MH* Megan Hamilton, Acting Assistant Deputy Director
Enforcement Division

From: *MP* Michael Parrish, Agenda Special Assistant
Enforcement Division

Date: September 5, 2025

Subject: **Supplemental Information**
September 10, 2025 Commission Agenda
Item No. 21 – Corpus Christi Liquefaction, LLC
Docket No. 2024-1376-AIR-E

Enclosed please find the following:

Compliance History

- Adding Appendix Pages 7 through 18

Please do not hesitate to call Michael Parrish at (512) 239-2548 if you have any questions regarding this matter.

cc: Garrett Arthur, Public Interest Counsel
Melissa Schmidt, Public Interest Counsel
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Katherine McKenzie, Agenda Coordinator, Litigation Division
Amy Settemeyer, Deputy Director, Enforcement Division
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Johnny Bowers, Manager, Air Section, Enforcement Division
Margarita Dennis, Team Leader, Air Section Enforcement Division
Yuliya Dunaway, Enforcement Coordinator, Air Section, Enforcement Division

Component Appendices

Appendix A

All NOVs Issued During Component Period 3/5/2020 and 3/5/2025

1	Date: 06/30/2020 (1779566)		
	Self Report? YES	Classification: Moderate	
	Citation:		
	2D TWC Chapter 26, SubChapter A 26.121(a)		
	30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		
2	Date: 07/31/2020 (1779571)		
	Self Report? YES	Classification: Moderate	
	Citation:		
	2D TWC Chapter 26, SubChapter A 26.121(a)		
	30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		
3	Date: 08/27/2020 (1664747)		
	Self Report? NO	Classification: Moderate	
	Citation:		
	/PSDTX1306M1, SC 13 PERMIT		
	/PSDTX1306M1, SC 23D PERMIT		
	30 TAC Chapter 101, SubChapter A 101.20(3)		
	30 TAC Chapter 116, SubChapter B 116.115(c)		
	30 TAC Chapter 122, SubChapter B 122.143(4)		
	5C THSC Chapter 382 382.085(b)		
	STC 3(A)(iv)(1) OP		
	STC 9 OP		
	Description: Failure to perform quarterly visible emissions observations.		
	Self Report? NO	Classification: Moderate	
	Citation:		
	30 TAC Chapter 122, SubChapter C 122.210(a)		
	5C THSC Chapter 382 382.085(b)		
	Description: Failure to operate as represented.		
	Self Report? NO	Classification: Moderate	
	Citation:		
	30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)		
	30 TAC Chapter 122, SubChapter B 122.143(4)		
	30 TAC Chapter 122, SubChapter B 122.143(6)		
	5C THSC Chapter 382 382.085(b)		
	STC 1A OP		
	Description: Failure to operate flare without visible emissions.		
	Self Report? NO	Classification: Moderate	
	Citation:		
	30 TAC Chapter 101, SubChapter A 101.20(3)		
	30 TAC Chapter 116, SubChapter B 116.115(c)		
	30 TAC Chapter 122, SubChapter B 122.143(4)		
	5C THSC Chapter 382 382.085(b)		
	SC 6(B) PERMIT		
	STC 9 OP		
	Description: Failure to a perform cylinder gas audit (CGA) as required.		
	Self Report? NO	Classification: Moderate	
	Citation:		
	/PSDTX1306M1, SC 10 PERMIT		
	30 TAC Chapter 101, SubChapter A 101.20(3)		
	30 TAC Chapter 116, SubChapter B 116.115(c)		
	30 TAC Chapter 122, SubChapter B 122.143(4)		
	5C THSC Chapter 382 382.085(b)		
	STC 9 OP		
	Description: Failure to comply with thermal oxidizer operational requirements.		
	Self Report? NO	Classification: Moderate	
	Citation:		
	/PSDTX1306M1, SC 11(A) PERMIT		
	30 TAC Chapter 101, SubChapter A 101.20(3)		

30 TAC Chapter 116, SubChapter B 116.115(b)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.143(6)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
 5C THSC Chapter 382 382.085(b)
 STC 1A OP
 STC 9 OP
 Description: Failure to operate a flare above minimum required net heating value.
 Self Report? NO Classification: Moderate
 Citation:
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 PSDTX1306M1, SC 4(C) PERMIT
 STC 9 OP
 Description: Failure to comply with turbine planned startup or shutdown time limits.
 Self Report? NO Classification: Moderate
 Citation:
 /PSDTX1306M1, SC 1 PERMIT
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 STC 9 OP
 Description: Failure to comply with permitted emission rates for Wet/Dry Gas Flare 1 (emission point number [EPN] WTDYFLR1).
 Self Report? NO Classification: Moderate
 Citation:
 /PSDTX1306M1, SC 1 PERMIT
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 STC 9 OP
 Description: Failure to comply with permitted emission rates for the Marine Flare (EPN MRNFLR).
 Self Report? NO Classification: Moderate
 Citation:
 /PSDTX1306M, SC 18E OP
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 STC 9 OP
 Description: Failure to equip each open ended valve or line (OEL) with an appropriately sized cap, blind flange, plug, or a second valve to seal the line.
 Self Report? NO Classification: Moderate
 Citation:
 30 TAC Chapter 113, SubChapter C 113.880
 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.143(6)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEEE 63.2343(c)
 5C THSC Chapter 382 382.085(b)
 STC 1A OP
 STC 1E OP
 Description: Failure to submit notifications by the required timeframe.
 Self Report? NO Classification: Moderate
 Citation:
 /PSDTX1306M1, SC 1 PERMIT
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 STC 9 OP
 Description: Failure to comply with permitted emission rates for the Annual Flare Cap (EPN WTDYFLR1-2).

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 115, SubChapter B 115.112(c)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(3)
5C THSC Chapter 382 382.085(b)
STC 1A OP
STC 4 OP
STC 8 OP

Description: Failure to monitor at carbon canisters as required.

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 115, SubChapter B 115.112(c)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(3)
5C THSC Chapter 382 382.085(b)
STC 1A OP
STC 4 OP
STC 8 OP

Description: Failure to replace a carbon canister within the required time interval.

Self Report? NO Classification: Moderate

Citation:

/PSDTX1306M1, SC 23 PERMIT
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
STC 15 OP
STC 9 OP

Description: Failure to maintain records.

4 Date: 10/31/2020 (1779587)

Self Report? YES Classification: Moderate

Citation:

2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

5 Date: 01/31/2021 (1779542)

Self Report? YES Classification: Moderate

Citation:

2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

6 Date: 07/23/2021 (1711607)

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 6B PERMIT
STC 9 OP

Description: Failure to perform a cylinder gas audit (CGA) as required.

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
GTC OP

Description: Failure to report all instances of deviations on previous deviation reports.

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 101, SubChapter A 101.20(3)

	30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.143(6) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii) 5C THSC Chapter 382 382.085(b) SC 11A PERMIT SC 2A PERMIT STC 1A OP STC 9 OP		
Description:	Failure to operate Wet/Dry Gas Flare 2 (EPN WTDYFLR2) above the minimum required net heating value.		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) SC 18E PERMIT STC 9 OP		
Description:	Failure to equip each open ended valve or line (OEL) with an appropriately sized cap, blind flange, plug, or a second valve to seal the line.		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.143(6) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii) 5C THSC Chapter 382 382.085(b) SC 11A PERMIT SC 2A PERMIT STC 1A OP STC 9 OP		
Description:	Failure to operate Wet/Dry Gas Flare 1 (EPN WTDYFLR1) above the minimum required net heating value.		
Self Report?	NO	Classification:	Moderate
Citation:	1A OP 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A) 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.143(6) 5C THSC Chapter 382 382.085(b)		
Description:	Failure to operate a flare without visible emissions.		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 115, SubChapter B 115.112(c)(1) 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.143(6) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(3) 5C THSC Chapter 382 382.085(b) STC 1A OP STC 4 OP STC 8 OP		
Description:	Failure to maintain recordkeeping requirements for Wastewater Tank (EPN WWTK1).		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) SC 10 PERMIT STC 9 OP		
Description:	Failure to comply with thermal oxidizer operational requirements for Thermal Oxidizer 2 (EPN TO-2).		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3)		

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 GC 14 PERMIT
 GC 8 PERMIT
 SC 1 PERMIT
 STC 9 OP
 Description: Failure to comply with permitted emission rates for Thermal Oxidizer 2 (EPN TO-2).
 Self Report? NO Classification: Moderate
 Citation:
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 18 PERMIT
 SC 28D PERMIT
 STC 3Aiv1 OP
 Description: Failure to perform quarterly visible emissions observations.
 Self Report? NO Classification: Moderate
 Citation:
 23I PERMIT
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 STC 9 OP
 Description: Failure to repair a leak with fifteen (15) calendar days from date of detection.
 Self Report? NO Classification: Moderate
 Citation:
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 7A PERMIT
 SC 7B PERMIT
 STC 9 OP
 Description: Failure to comply with fuel gas requirements.
 Self Report? NO Classification: Moderate
 Citation:
 30 TAC Chapter 101, SubChapter A 101.20(2)
 30 TAC Chapter 113, SubChapter C 113.1080
 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.143(6)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT YYYY 63.6145
 5C THSC Chapter 382 382.085(b)
 GTC OP
 STC 1A OP
 STC 1E OP
 Description: Failure to submit notifications within the required timeframe.

7 Date: 08/31/2021 (1779577)
 Self Report? YES Classification: Moderate
 Citation:
 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

8 Date: 06/17/2022 (1805519)
 Self Report? NO Classification: Moderate
 Citation:
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT IIII 60.4211(a)
 5C THSC Chapter 382 382.085(b)
 PSDTX1306M1, Special Condition No. 2C PERMIT
 Special Term and Condition No. 1A OP

Special Term and Condition No. 9 OP

Description: Failure to comply with applicable emissions requirements provided by 40 Code of Federal Regulations (CFR) Part 60 Subpart IIII for non-emergency engines.

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.8(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT KKKK 60.4400(a)
5C THSC Chapter 382 382.085(b)
PSDTX1306M1, Special Condition No. 20E PERMIT
Special Condition No. 11D PERMIT
Special Term and Condition No. 1A OP
Special Term and Condition No. 6B OP
Special Term and Condition No. 9 OP

Description: Failure to conduct an Initial Demonstration of Compliance Stack Test by the required deadline.

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP

Description: Failure to report all instances of deviations on previous deviation reports.

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
PSDTX1306M1, Special Condition No. 23I PERMIT
Special Condition No. 16I PERMIT
Special Term and Condition No. 9 OP

Description: Failure to repair a leak within fifteen calendar days from the date of detection.

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
PSDTX1306M1, Special Condition No. 1 PERMIT
Special Term and Condition No. 9 OP

Description: Failure to comply with permitted emission rates for refrigeration compressor turbine 16 (EPN TRB16).

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
PSDTX1306M1, Special Condition No. 1 PERMIT
Special Term and Condition No. 9 OP

Description: Failure to comply with permitted emission rates for thermal oxidizer 1 (EPN TO-1).

Self Report? NO Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
PSDTX1306M1, Special Condition No. 1 PERMIT
Special Term and Condition No. 9 OP

Description: Failure to comply with permitted emission rates for thermal oxidizer 2 (EPN TO-2).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
PSDTX1306M1, Special Condition No. 1 PERMIT
Special Term and Condition No. 9 OP

Description: Failure to comply with permitted emission rates for thermal oxidizer 3 (EPN TO-3).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
PSDTX1306M1, Special Condition No. 7A PERMIT
Special Term and Condition No. 9 OP

Description: Failure to limit hydrogen sulfide (H2S) content of fuel utilized by thermal oxidizers and flare pilots to four (4) parts per million volume (ppmv).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
PSDTX1306M1, Special Condition No. 23F PERMIT
Special Term and Condition No. 9 OP

Description: Failure to perform quarterly LDAR monitoring of all components.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
PSDTX1306M1, Special Condition No. 1 PERMIT
Special Term and Condition No. 9 OP

Description: Failure to comply with permitted emissions rates for marine flare (EPN MRNFLR).

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Date: 05/04/2023 (1873988)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition No. 14A PERMIT
Special Condition No. 7A PERMIT
Special Term and Condition No. 9 OP

Description: Failure to maintain minimum net heating value.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition No. 14A PERMIT
Special Condition No. 7A PERMIT
Special Term and Condition No. 9 OP

Description: Failure to maintain minimum net heating value.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition No. 14A PERMIT
Special Condition No. 7A PERMIT

Special Term and Condition No. 9 OP			
Description:	Failure to maintain minimum net heating value.		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Special Condition No. 1 PERMIT Special Term and Condition No. 9 OP		
Description:	Failure to comply with permitted emission rates.		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Special Condition No. 1 PERMIT Special Term and Condition No. 9 OP		
Description:	Failure to comply with permitted emission rates.		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Special Condition No. 1 PERMIT Special Term and Condition No. 9 OP		
Description:	Failure to comply with permitted emission rates.		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Special Condition No. 1 PERMIT Special Condition No. 15 PERMIT Special Condition No. 8 PERMIT Special Term and Condition No. 9 OP		
Description:	Failure to return BOG meeting quality and temperature specifications to the process while loading a LNGC.		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Special Condition No. 16E PERMIT Special Condition No. 23E PERMIT Special Term and Condition No. 9 OP		
Description:	Failure to equip each open-ended line (OEL) with a cap, blind flange, plug, or a second valve.		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2)(A) 5C THSC Chapter 382 382.085(b) General Terms and Conditions OP		
Description:	Failure to report all instances of deviations on previous deviation reports (DRs).		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Special Term and Condition No. 3A(iv)(1) OP		
Description:	Failure to conduct visible emissions monitoring at least once during each calendar quarter.		

Self Report? NO Classification: Moderate
 Citation:
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition No. 16H PERMIT
 Special Condition No. 16I PERMIT
 Special Condition No. 23H PERMIT
 Special Condition No. 23I PERMIT
 Special Term and Condition No. 9 OP
 Description: Failure to repair leaking components within allotted time frames.

10* Date: 08/09/2024 (1930080)
 Self Report? YES Classification: Moderate
 Citation:
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 16F PERMIT
 SC 23F PERMIT
 STC 9 OP
 Description: Failure to conduct monitoring of components as required.
 Self Report? YES Classification: Moderate
 Citation:
 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 GTC OP
 Description: Failure to report all instances of deviations on previous deviation reports.
 Self Report? YES Classification: Moderate
 Citation:
 30 TAC Chapter 101, SubChapter A 101.20(1)
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.143(6)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(1)
 5C THSC Chapter 382 382.085(b)
 SC 14A PERMIT
 STC 1A OP
 STC 9 OP
 Description: Failure to operate flare without visible emissions.
 Self Report? YES Classification: Moderate
 Citation:
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Description: Failure to equip each open-ended valve or line (OEL) with an appropriately sized cap, blind flange, plug, or a second valve to seal the line.
 Self Report? YES Classification: Moderate
 Citation:
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 18 PERMIT
 STC 9 OP
 Description: Failure to perform quarterly visible emissions observations for EPN TO-1.

11* Date: 08/31/2024 (2025996)
 Self Report? YES Classification: Moderate
 Citation:
 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

12	Date: 09/30/2024 (2032105)		
	Self Report? YES	Classification: Moderate	
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		
13	Date: 02/28/2025 (2047340)		
	Self Report? NO	Classification: Minor	
	Citation: 30 TAC Chapter 290, SubChapter F 290.109(d)(1)(A)		
	Description: Failed to collect routine distribution coliform samples at a customer's premise, dedicated sampling station, or other designated compliance sampling location at active service connections which are representative of water quality throughout the distribution system.		
	Self Report? NO	Classification: Minor	
	Citation: 30 TAC Chapter 290, SubChapter D 290.46(s)(2)(C)(i)		
	Description: Failed to verify the accuracy of manual disinfectant residual analyzers at least once every 90 days.		

* NOVs applicable for the Compliance History rating period 9/1/2019 to 8/31/2024

Appendix B

All Investigations Conducted During Component Period March 05, 2020 and March 05, 2025

Item 1*	March 06, 2020**	(1632574)
Item 2*	April 20, 2020**	(1779541)
Item 3*	May 14, 2020**	(1645407)
Item 4*	May 21, 2020**	(1646900)
Item 5*	June 24, 2020**	(1652577)
Item 6*	July 23, 2020**	(1779556)
Item 7*	August 13, 2020**	(1622660)
Item 8	August 26, 2020**	(1670275)
Item 9	August 27, 2020**	(1664747)
Item 10*	October 06, 2020**	(1679110)
Item 11*	October 09, 2020**	(1622659)
Item 12*	October 23, 2020**	(1678317)
Item 13	October 26, 2020**	(1779571)
Item 14*	October 29, 2020**	(1685520)
Item 15*	November 13, 2020**	(1659743)
Item 16*	November 17, 2020**	(1690485)
Item 17	November 23, 2020**	(1686774)
Item 18*	December 17, 2020**	(1697140)
Item 19*	December 23, 2020**	(1697125)
Item 20	January 19, 2021**	(1779587)
Item 21*	January 25, 2021**	(1692337)
Item 22*	April 15, 2021**	(1706110)
Item 23	April 22, 2021**	(1779542)
Item 24*	May 13, 2021**	(1706400)
Item 25*	June 28, 2021**	(1711699)
Item 26*	June 30, 2021**	(1711751)
Item 27*	July 22, 2021**	(1779557)

Item 28	July 23, 2021**	(1711607)
Item 29*	October 19, 2021**	(1779572)
Item 30*	November 17, 2021**	(1785844)
Item 31*	December 14, 2021**	(1792897)
Item 32*	January 18, 2022**	(1800730)
Item 33*	February 15, 2022**	(1808558)
Item 34*	March 16, 2022**	(1815616)
Item 35*	April 13, 2022**	(1822172)
Item 36*	May 12, 2022**	(1831072)
Item 37*	June 08, 2022**	(1837322)
Item 38*	June 16, 2022**	(1819375)
Item 39	June 17, 2022**	(1805519)
Item 40*	July 18, 2022**	(1844508)
Item 41*	August 17, 2022**	(1850715)
Item 42*	September 12, 2022**	(1858449)
Item 43*	October 11, 2022**	(1864790)
Item 44*	November 16, 2022**	(1871698)
Item 45*	November 23, 2022**	(1855793)
Item 46	December 14, 2022**	(1854842)
Item 47*	January 17, 2023**	(1884365)
Item 48	February 10, 2023**	(1847957)
Item 49*	February 14, 2023**	(1892177)
Item 50*	March 08, 2023**	(1900755)
Item 51*	March 31, 2023**	(1887462)
Item 52*	April 12, 2023**	(1907549)
Item 53*	May 03, 2023**	(1896833)
Item 54	May 04, 2023**	(1873988)
Item 55*	May 10, 2023**	(1914696)
Item 56*	May 22, 2023**	(1898192)
Item 57*	June 07, 2023**	(1921315)
Item 58*	July 10, 2023**	(1928293)
Item 59*	July 11, 2023**	(1911840)
Item 60	August 09, 2023**	(1917630)
Item 61*	August 14, 2023**	(1935225)
Item 62*	September 14, 2023**	(1941451)
Item 63*	October 06, 2023**	(1925636)
Item 64*	October 16, 2023**	(1948208)
Item 65*	November 14, 2023**	(1953894)
Item 66*	December 07, 2023**	(1963687)
Item 67*	January 10, 2024**	(1970257)
Item 68*	February 08, 2024**	(1979338)
Item 69*	March 15, 2024**	(1967927)
Item 70*	March 25, 2024**	(1985898)
Item 71*	April 15, 2024**	(1992436)
Item 72*	May 08, 2024**	(1998877)
Item 73*	June 17, 2024**	(2005834)
Item 74*	July 16, 2024**	(2013399)
Item 75	August 09, 2024**	(1930080)
Item 76*	August 15, 2024**	(2019210)

Item 77	September 11, 2024	(2025996)
Item 78	October 16, 2024	(2032105)
Item 79*	November 13, 2024	(2038420)
Item 80*	December 05, 2024	(2044866)
Item 81	December 06, 2024	(2027511)
Item 82*	January 17, 2025	(2035617)
Item 83*	February 06, 2025	(2016233)
Item 84	February 28, 2025	(2047340)

* No violations documented during this investigation

** Investigation applicable for the Compliance History Rating period between 09/01/2019 and 08/31/2024.

Executive Summary – Enforcement Matter – Case No. 66613
Corpus Christi Liquefaction, LLC
RN104104716
Docket No. 2024-1376-AIR-E

Order Type:

Findings Agreed Order

Findings Order Justification:

Three repeated enforcement actions (or two orders with nuisance violations) over the prior five year period for the same violation(s).

Media:

AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

Corpus Christi Liquefaction, 622 Highway 35, Gregory, San Patricio County

Type of Operation:

Liquefied natural gas facility

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: June 13, 2025

Comments Received: No

Penalty Information

Total Penalty Assessed: \$34,800

Total Paid to General Revenue: \$17,400

Total Due to General Revenue: \$0

Payment Plan: N/A

Supplemental Environmental Project (“SEP”) Conditional Offset: \$17,400

Name of SEP: Texas A&M University – Corpus Christi (Third-Party Pre-Approved)

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: June 5, 2024 through June 19, 2024

Date(s) of NOE(s): August 9, 2024

Violation Information

Executive Summary – Enforcement Matter – Case No. 66613
Corpus Christi Liquefaction, LLC
RN104104716
Docket No. 2024-1376-AIR-E

1. Failed to maintain the net heating value of the gas being combusted at 300 British thermal units per standard cubic foot ("Btu/scf") or greater if the flare is steam-assisted or air-assisted [30 TEX. ADMIN. CODE §§ 101.20(1), 116.115(c), and 122.143(4), 40 CODE OF FEDERAL REGULATIONS ("CFR") § 60.18(c)(3)(ii), New Source Review ("NSR") Permit Nos. 105710 and PSDTX1306M1, Special Conditions ("SC") No. 14.A, Federal Operating Permit ("FOP") No. O3580, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") Nos. 1.A and 9, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

2. Failed to maintain the net heating value of the gas being combusted at 300 Btu/scf or greater if the flare is steam-assisted or air-assisted [30 TEX. ADMIN. CODE §§ 101.20(1), 116.115(c), and 122.143(4), 40 CFR § 60.18(c)(3)(ii), NSR Permit Nos. 105710 and PSDTX1306M1, SC No. 14.A, FOP No. O3580, GTC and STC Nos. 1.A and 9, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

By December 9, 2024, the Respondent updated the environmental alarm logic by changing the alarm for low-BTU from high to critical priority, revised operator actions in response to alarms, updated the distribution list to receive automatic compliance notification alerts, and conducted operator refresher training on permit limitations and low-BTU alarms in a timely manner in order to maintain the net heating value of the gas being combusted at 300 Btu/scf or greater for the Wet/Dry Gas Flare 1, Emissions Point Number ("EPN") WTDYFLR1, and the Wet/Dry Gas Flare 2, EPN WTDYFLR2.

Technical Requirements:

The Order will require the Respondent to implement and complete a SEP (see SEP Attachment A).

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Yuliya Dunaway, Enforcement Division, Enforcement Team 2, MC R-13, (210) 403-4077; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

TCEQ SEP Coordinator: Stuart Beckley, Enforcement Division, MC 219, (512) 239-3565

SEP Third-Party Administrator: Texas A&M University Corpus Christi, 6300 Ocean Drive, Unit 5854, Corpus Christi, Texas 78412

Respondent: Nishita Singh, Vice President & General Manager, Corpus Christi Liquefaction, LLC, P.O. Box 162, Gregory, Texas 78359

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	14-Aug-2024	Screening	14-Aug-2024	EPA Due	
	PCW	5-Mar-2025				

RESPONDENT/FACILITY INFORMATION

Respondent	Corpus Christi Liquefaction, LLC				
Reg. Ent. Ref. No.	RN104104716				
Facility/Site Region	14-Corpus Christi	Major/Minor Source	Major		

CASE INFORMATION

Enf./Case ID No.	66613	No. of Violations	2
Docket No.	2024-1376-AIR-E	Order Type	Findings
Media Program(s)	Air	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Yuliya Dunaway
		EC's Team	Enforcement Team 2
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$30,000
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History	26.0%	Adjustment	Subtotals 2, 3, & 7	\$7,800
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Notes: Enhancement for one NOV with same/similar violations, three NOVs with dissimilar violations, and one order containing a denial of liability. Reduction for three notices of intent to conduct an audit and one disclosure of violations.

Culpability	No	0.0%	Enhancement	Subtotal 4	\$0
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Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments	Subtotal 5	-\$3,000
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts	\$863
Estimated Cost of Compliance	\$10,000

*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$34,800
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount	\$34,800
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$34,800
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DEFERRAL	0.0%	Reduction	Adjustment	\$0
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes:

No deferral is recommended for Findings Orders.

PAYABLE PENALTY	\$34,800
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Screening Date	14-Aug-2024	Docket No.	2024-1376-AIR-E	PCW
Respondent	Corpus Christi Liquefaction, LLC			Policy Revision 5 (January 28, 2021)
Case ID No.	66613			PCW Revision February 11, 2021
Reg. Ent. Reference No.	RN104104716			
Media	Air			
Enf. Coordinator	Yuliya Dunaway			

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	1	5%
	Other written NOVs	3	6%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	1	20%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	3	-3%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	1	-2%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 26%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for one NOV with same/similar violations, three NOVs with dissimilar violations, and one order containing a denial of liability. Reduction for three notices of intent to conduct an audit and one disclosure of violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 26%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 26%

Screening Date	14-Aug-2024	Docket No.	2024-1376-AIR-E	PCW
Respondent	Corpus Christi Liquefaction, LLC			Policy Revision 5 (January 28, 2021)
Case ID No.	66613			PCW Revision February 11, 2021
Reg. Ent. Reference No.	RN104104716			
Media	Air			
Enf. Coordinator	Yuliya Dunaway			
Violation Number	1			
Rule Cite(s)	30 Tex. Admin. Code §§ 101.20(1), 116.115(c), and 122.143(4), 40 Code of Federal Regulations ("CFR") § 60.18(c)(3)(ii), New Source Review ("NSR") Permit Nos. 105710 and PSDTX1306M1, Special Conditions ("SC") No. 14.A, Federal Operating Permit ("FOP") No. O3580, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") Nos. 1.A and 9, and Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failed to maintain the net heating value of the gas being combusted at 300 British thermal units per standard cubic foot ("Btu/scf") or greater if the flare is steam-assisted or air-assisted. Specifically, the net heating value of the gas being combusted by the Wet/Dry Gas Flare 1, Emissions Point Number ("EPN") WTDYFLR1, was less than 300 Btu/scf when the net heating value ranged from 133 Btu/scf to 230 Btu/scf for a total of ten hours on four days from March 20, 2023 to July 10, 2023.			
		Base Penalty	\$25,000	
>> Environmental, Property and Human Health Matrix				
OR	Release	Harm		
		Major Moderate Minor		
	Actual Potential			x
			Percent	30.0%
>>Programmatic Matrix				
	Falsification	Major Moderate Minor		
			Percent	0.0%
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.			
		Adjustment	\$17,500	
			\$7,500	
Violation Events				
	Number of Violation Events	2	4	Number of violation days
	daily weekly monthly quarterly semiannual annual single event			
			x	
				Violation Base Penalty
				\$15,000
	Two quarterly events are recommended for the instances of non-compliance that occurred from March 20, 2023 to July 10, 2023.			
Good Faith Efforts to Comply	10.0%		Reduction	\$1,500
	Before NOE/NOV NOE/NOV to EDRP/Settlement Offer			
	Extraordinary			
	Ordinary		x	
	N/A			
	Notes	The Respondent achieved compliance by December 9, 2024, after the Notice of Enforcement ("NOE") dated August 9, 2024.		
		Violation Subtotal	\$13,500	
Economic Benefit (EB) for this violation				
	Statutory Limit Test			
	Estimated EB Amount	\$863	Violation Final Penalty Total	\$17,400
	This violation Final Assessed Penalty (adjusted for limits)			\$17,400

Economic Benefit Worksheet

Respondent Corpus Christi Liquefaction, LLC
Case ID No. 66613
Reg. Ent. Reference No. RN104104716
Media Air
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	20-Mar-2023	9-Dec-2024	1.73	\$863	n/a	\$863

Notes for DELAYED costs

Estimated cost to update the environmental alarm logic by changing the alarm for low-BTU from high to critical priority, revise operator actions in response to alarms, update the distribution list to receive automatic compliance notification alerts, and conduct operator refresher training on permit limitations and low-BTU alarms in a timely manner in order to maintain the net heating value of the gas being combusted at 300 Btu/scf or greater for the Wet/Dry Gas Flare 1, EPN WTDYFLR1, and the Wet/Dry Gas Flare 2, EPN WTDYFLR2. The Date Required is the initial date of non-compliance and the Final Date is the date of compliance.

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$10,000

TOTAL

\$863

Screening Date	14-Aug-2024	Docket No.	2024-1376-AIR-E	PCW	
Respondent	Corpus Christi Liquefaction, LLC	<i>Policy Revision 5 (January 28, 2021)</i>			
Case ID No.	66613	<i>PCW Revision February 11, 2021</i>			
Reg. Ent. Reference No.	RN104104716				
Media	Air				
Enf. Coordinator	Yuliya Dunaway				
Violation Number	2				
Rule Cite(s)	30 Tex. Admin. Code §§ 101.20(1), 116.115(c), and 122.143(4), 40 CFR § 60.18(c)(3)(ii), NSR Permit Nos. 105710 and PSDTX1306M1, SC No. 14.A, FOP No. 03580, GTC and STC Nos. 1.A and 9, and Tex. Health & Safety Code § 382.085(b)				
Violation Description	Failed to maintain the net heating value of the gas being combusted at 300 Btu/scf or greater if the flare is steam-assisted or air-assisted. Specifically, the net heating value of the gas being combusted by the Wet/Dry Gas Flare 2, EPN WTDYFLR2, was less than 300 Btu/scf when the net heating value ranged from 178 Btu/scf to 299 Btu/scf for a total of four hours on May 19, 2023, August 11, 2023, and December 30, 2023.				
Base Penalty			\$25,000		
>> Environmental, Property and Human Health Matrix					
OR	Release	Major	Moderate	Minor	
	Actual			x	Percent 30.0%
	Potential				
>> Programmatic Matrix					
	Falsification	Major	Moderate	Minor	
					Percent 0.0%
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.				
Adjustment			\$17,500		
			\$7,500		
>> Violation Events					
Number of Violation Events		2	3	Number of violation days	
	daily				
	weekly				
	monthly				
	quarterly	x			
	semiannual				
	annual				
	single event				
Violation Base Penalty \$15,000					
Two quarterly events are recommended for the instances of non-compliance that occurred from May 19, 2023 to August 11, 2023 and on December 30, 2023.					
Good Faith Efforts to Comply		10.0%	Reduction \$1,500		
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer			
Extraordinary					
Ordinary		x			
N/A					
Notes	The Respondent achieved compliance by December 9, 2024, after the NOE dated August 9, 2024.				
Violation Subtotal			\$13,500		
Economic Benefit (EB) for this violation			Statutory Limit Test		
Estimated EB Amount		\$0	Violation Final Penalty Total \$17,400		
This violation Final Assessed Penalty (adjusted for limits)			\$17,400		

Economic Benefit Worksheet

Respondent Corpus Christi Liquefaction, LLC
Case ID No. 66613
Reg. Ent. Reference No. RN104104716
Media Air
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See the Economic Benefit Worksheet for Violation No. 1.

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$0

TOTAL

\$0



Compliance History Report

Compliance History Report for CN604136374, RN104104716, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

Customer, Respondent, or Owner/Operator:	CN604136374, Corpus Christi Liquefaction, LLC	Classification:	SATISFACTORY	Rating:	7.72
Regulated Entity:	RN104104716, CORPUS CHRISTI LIQUEFACTION	Classification:	SATISFACTORY	Rating:	7.72
Complexity Points:	26	Repeat Violator:	NO		
CH Group:	14 - Other				
Location:	622 HWY 35 GREGORY, SAN PATRICIO COUNTY, TX				
TCEQ Region:	REGION 14 - CORPUS CHRISTI				
ID Number(s):					
AIR OPERATING PERMITS	PERMIT 3580	AIR OPERATING PERMITS	ACCOUNT NUMBER SDA005E		
AIR OPERATING PERMITS	PERMIT 4592	PUBLIC WATER SYSTEM/SUPPLY	REGISTRATION 2050079		
AIR NEW SOURCE PERMITS	PERMIT 105710	AIR NEW SOURCE PERMITS	EPA PERMIT GHGPSDTX123		
AIR NEW SOURCE PERMITS	EPA PERMIT GHGPSDTX157	AIR NEW SOURCE PERMITS	EPA PERMIT PSDTX1496		
AIR NEW SOURCE PERMITS	EPA PERMIT PSDTX1306	AIR NEW SOURCE PERMITS	PERMIT 139479		
AIR NEW SOURCE PERMITS	REGISTRATION 167968	AIR NEW SOURCE PERMITS	EPA PERMIT PSDTX1306M1		
AIR NEW SOURCE PERMITS	EPA PERMIT GHGPSDTX123M1	AIR NEW SOURCE PERMITS	EPA PERMIT PSDTX1496M1		
AIR NEW SOURCE PERMITS	EPA PERMIT PSDTX1306M2	AIR NEW SOURCE PERMITS	EPA PERMIT GHGPSDTX157M1		
AIR NEW SOURCE PERMITS	AFS NUM 4840900071	WASTEWATER	PERMIT WQ0005367000		
WASTEWATER	EPA ID TX0134002	AIR EMISSIONS INVENTORY	ACCOUNT NUMBER SDA005E		
TAX RELIEF	ID NUMBER 24569	TAX RELIEF	ID NUMBER 23975		
TAX RELIEF	ID NUMBER 24545	TAX RELIEF	ID NUMBER 23760		
TAX RELIEF	ID NUMBER 23498	TAX RELIEF	ID NUMBER 24547		
TAX RELIEF	ID NUMBER 23495	TAX RELIEF	ID NUMBER 23912		
TAX RELIEF	ID NUMBER 23911	TAX RELIEF	ID NUMBER 23494		
TAX RELIEF	ID NUMBER 23761	TAX RELIEF	ID NUMBER 23762		
TAX RELIEF	ID NUMBER 23763	TAX RELIEF	ID NUMBER 22908		
TAX RELIEF	ID NUMBER 23057	TAX RELIEF	ID NUMBER 22931		
TAX RELIEF	ID NUMBER 22923	TAX RELIEF	ID NUMBER 22919		
TAX RELIEF	ID NUMBER 22989	TAX RELIEF	ID NUMBER 22590		
TAX RELIEF	ID NUMBER 22916	TAX RELIEF	ID NUMBER 22988		
TAX RELIEF	ID NUMBER 22907	TAX RELIEF	ID NUMBER 22929		
TAX RELIEF	ID NUMBER 22930	TAX RELIEF	ID NUMBER 22913		
TAX RELIEF	ID NUMBER 22909	TAX RELIEF	ID NUMBER 23056		
TAX RELIEF	ID NUMBER 22920	TAX RELIEF	ID NUMBER 22589		
TAX RELIEF	ID NUMBER 22924	TAX RELIEF	ID NUMBER 22910		
TAX RELIEF	ID NUMBER 23297	TAX RELIEF	ID NUMBER 22917		
TAX RELIEF	ID NUMBER 22918	TAX RELIEF	ID NUMBER 22925		
TAX RELIEF	ID NUMBER 22927	TAX RELIEF	ID NUMBER 22912		
TAX RELIEF	ID NUMBER 22922	TAX RELIEF	ID NUMBER 22906		
TAX RELIEF	ID NUMBER 22926	TAX RELIEF	ID NUMBER 22928		
TAX RELIEF	ID NUMBER 22921	TAX RELIEF	ID NUMBER 23058		
TAX RELIEF	ID NUMBER 22610	TAX RELIEF	ID NUMBER 22915		
TAX RELIEF	ID NUMBER 22914	TAX RELIEF	ID NUMBER 25868		
TAX RELIEF	ID NUMBER 25867	TAX RELIEF	ID NUMBER 24021		
TAX RELIEF	ID NUMBER 24546	TAX RELIEF	ID NUMBER 24570		
TAX RELIEF	ID NUMBER 27064	TAX RELIEF	ID NUMBER 27063		

Compliance History Period: September 01, 2019 to August 31, 2024**Rating Year:** 2024**Rating Date:** 09/01/2024**Date Compliance History Report Prepared:** March 05, 2025**Agency Decision Requiring Compliance History:** Enforcement**Component Period Selected:** March 05, 2020 to March 05, 2025**TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.****Name:** Johnnie Wu**Phone:** (512) 239-2524**Site and Owner/Operator History:**

- 1) Has the site been in existence and/or operation for the full five year compliance period? YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

Components (Multimedia) for the Site Are Listed in Sections A - J**A. Final Orders, court judgments, and consent decrees:**

1 Effective Date: 03/13/2023 ADMINORDER 2021-1033-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)

Rqmt Prov: SC 1 PERMIT
 STC 9 OP

Description: Failure to comply with the MAER for the Condensate Tank (EPN IFRTK1). Specifically, the Respondent exceeded the VOC MAER of 0.43 ton per year ("tpy") based on a 12-month rolling period for the 12-month period ending on October 2020 for the Condensate Tank, EPN IFRTK1, resulting in approximately 0.11 ton of unauthorized VOC emissions.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)

Rqmt Prov: SC 10 PERMIT
 STC 9 OP

Description: Failure to comply with the minimum outlet temperature for the thermal oxidizer (EPN TO-1). Specifically, the Respondent established the minimum outlet temperature for the Thermal Oxidizer to be 1,740 °F on an hourly average basis when waste gas is directed to the Thermal Oxidizer, but the outlet temperature was below 1,740 °F for a total of 24 hours from January 1, 2020 to April 19, 2020 and a total of seven hours from September 6, 2020 to October 29, 2020.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 115, SubChapter B 115.112(c)(1)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(3)
 5C THSC Chapter 382 382.085(b)

Rqmt Prov: SC 2B PERMIT
 STC 1A OP
 STC 4 OP
 STC 8 OP

Description: Failure to replace carbon canister after exceeding the VOC concentration limit. Specifically, the carbon canisters of the carbon absorption system for the Wastewater Tank exceeded the VOC concentration limit of 100 parts per million on January 6, 2020 and on September 9, 2020, but the carbon canisters were not replaced in a timely manner.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: SC 1 PERMIT

STC 9 OP

Description: Failure to comply with the MAERs for the Marine Flare ([EPN] MRNFLR). Specifically, the Respondent exceeded the nitrogen oxides ("NOx") MAER of 106.23 pounds per hour ("lbs/hr") by 23.33 lbs/hr for one hour on January 22, 2020 and the VOC MAER of 7.85 lbs/hr by a range from 0.16 lb/hr to 37.47 lbs/hr for a total of 17 hours on May 2, 2020, October 14, 2020, November 17, 2020, and November 22, 2020 for the Marine Flare, EPN MRNFLR, resulting in 23.33 pounds ("lbs") of unauthorized VOC emissions.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: GC 14 PERMIT

GC 8 PERMIT

SC 1 PERMIT

STC 9 OP

Description: Failure to comply with the MAER for Wet/Dry Gas Flare 2 (EPN WTDYFLR2). Specifically, the Respondent exceeded the CO MAER of 106.20 lbs/hr by 35.80 lbs/hr and 50.80 lbs/hr for two hours on January 24, 2020 for the Wet/Dry Gas Flare 2, EPN WTDYFLR2, resulting in 86.60 lbs of unauthorized CO emissions.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: SC 1 PERMIT

STC 9 OP

Description: Failure to comply with the MAER for Wet/Dry Gas Flare 1 (EPN WTDYFLR1). Specifically, the Respondent exceeded the VOC MAER of 5.21 lbs/hr by a range from 0.37 lb/hr to 29.8 lbs/hr for four hours on February 20, 2020 and two hours on October 23, 2020 for the Wet/Dry Gas Flare 1, EPN WTDYFLR1, resulting in 48.80 lbs of unauthorized VOC emissions.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

Item 1	March 06, 2020	(1632574)
Item 2	April 20, 2020	(1779541)
Item 3	May 14, 2020	(1645407)
Item 4	May 21, 2020	(1646900)
Item 5	June 24, 2020	(1652577)
Item 6	July 23, 2020	(1779556)
Item 7	August 13, 2020	(1622660)
Item 8	October 06, 2020	(1679110)
Item 9	October 09, 2020	(1622659)
Item 10	October 23, 2020	(1678317)
Item 11	October 26, 2020	(1779576)
Item 12	October 29, 2020	(1685520)
Item 13	November 13, 2020	(1659743)
Item 14	November 17, 2020	(1690485)
Item 15	December 17, 2020	(1697140)
Item 16	December 23, 2020	(1697125)
Item 17	January 19, 2021	(1779592)
Item 18	January 25, 2021	(1692337)
Item 19	April 15, 2021	(1706110)
Item 21	April 22, 2021	(1779546)
Item 22	May 13, 2021	(1706400)
Item 23	June 28, 2021	(1711699)

Item 24	June 30, 2021	(1711751)
Item 25	July 22, 2021	(1779557)
Item 26	October 19, 2021	(1779572)
Item 27	November 17, 2021	(1785844)
Item 29	January 18, 2022	(1800730)
Item 30	February 15, 2022	(1808558)
Item 31	March 16, 2022	(1815616)
Item 32	April 13, 2022	(1822172)
Item 33	May 12, 2022	(1831072)
Item 34	June 08, 2022	(1837322)
Item 35	June 16, 2022	(1819375)
Item 37	July 18, 2022	(1844508)
Item 39	September 12, 2022	(1858449)
Item 40	October 11, 2022	(1864790)
Item 41	November 16, 2022	(1871698)
Item 42	November 23, 2022	(1855793)
Item 43	December 14, 2022	(1877562)
Item 44	January 17, 2023	(1884365)
Item 46	February 14, 2023	(1892177)
Item 47	March 08, 2023	(1900755)
Item 48	March 31, 2023	(1887462)
Item 49	April 12, 2023	(1907549)
Item 50	May 03, 2023	(1896833)
Item 51	May 10, 2023	(1914696)
Item 52	May 22, 2023	(1898192)
Item 54	June 07, 2023	(1921315)
Item 55	July 10, 2023	(1928293)
Item 56	July 11, 2023	(1911840)
Item 57	August 14, 2023	(1935225)
Item 58	September 14, 2023	(1941451)
Item 59	October 06, 2023	(1925636)
Item 60	October 16, 2023	(1948208)
Item 61	November 14, 2023	(1953894)
Item 62	December 07, 2023	(1963687)
Item 63	January 10, 2024	(1970257)
Item 64	February 08, 2024	(1979338)
Item 66	March 15, 2024	(1967927)
Item 67	March 25, 2024	(1985898)
Item 68	April 15, 2024	(1992436)
Item 69	May 08, 2024	(1998877)
Item 70	June 17, 2024	(2005834)
Item 71	July 16, 2024	(2013399)
Item 72	August 15, 2024	(2019210)
Item 73	November 13, 2024	(2038420)
Item 74	December 05, 2024	(2044866)
Item 75	January 17, 2025	(2035617)
Item 76	February 06, 2025	(2016233)

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

1	Date:	08/09/2024	(1930080)		
	Self Report?	YES		Classification:	Moderate
	Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) SC 16F PERMIT SC 23F PERMIT STC 9 OP			
	Description:	Failure to conduct monitoring of components as required.			
	Self Report?	YES		Classification:	Moderate
	Citation:	30 TAC Chapter 122, SubChapter B 122.143(4)			

30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 GTC OP
 Description: Failure to report all instances of deviations on previous deviation reports.
 Self Report? YES Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.143(6)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(1)
 5C THSC Chapter 382 382.085(b)
 SC 14A PERMIT
 STC 1A OP
 STC 9 OP

Description: Failure to operate flare without visible emissions.
 Self Report? YES Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)

Description: Failure to equip each open-ended valve or line (OEL) with an appropriately sized cap, blind flange, plug, or a second valve to seal the line.
 Self Report? YES Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 18 PERMIT
 STC 9 OP

Description: Failure to perform quarterly visible emissions observations for EPN TO-1.

2 Date: 08/31/2024 (2025996)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

3 Date: 09/30/2024 (2032105)
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

4 Date: 02/28/2025 (2047340)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 290, SubChapter F 290.109(d)(1)(A)
 Description: Failed to collect routine distribution coliform samples at a customer's premise, dedicated sampling station, or other designated compliance sampling location at active service connections which are representative of water quality throughout the distribution system.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 290, SubChapter D 290.46(s)(2)(C)(i)
 Description: Failed to verify the accuracy of manual disinfectant residual analyzers at least once every 90 days.

F. Environmental audits:

Notice of Intent Date: 06/25/2020 (1664219)
 No DOV Associated

Notice of Intent Date: 10/23/2020 (1691239)
 No DOV Associated

Notice of Intent Date: 10/11/2023 (1938323)
 Disclosure Date: 01/29/2024
 Viol. Moderate

Classification:
 Citation: 30 TAC Chapter 122, SubChapter C 122.222(c)

Description: Failed to provide off-permit notifications for two emergency RICE compressors that were authorized through PBR.

Viol. Moderate
 Classification:
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6645(f)
 Rqmt Prov: PERMIT SC 3.D
 Description: Failed to submit initial notification for two emergency RICE compressors within 120 days of becoming subject to 40 CFR Part 63, Subpart ZZZZ.

Viol. Moderate
 Classification:
 Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6610(a)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6615
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6625
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6655
 Description: Failed to initiate requirements for non-emergency engines after two RICE compressors exceeded 50 non-emergency hours in a year, including conducting initial emissions tests for non-emergency engines, conducting semiannual emissions tests for non-emergency engines, installing CEMS or using CPMS with approved monitoring plan and submitting semiannual compliance reports.
 Disclosure Date: 07/24/2024

Viol. Minor
 Classification:
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 260, SubChapter I, PT 260, SubPT B 260.11(e)(1)
 Rqmt Prov: PERMIT SC 16F
 PERMIT SC 23.F
 Description: Failed to make readily available Zero Air Certificate of Analysis documentation to show that Zero Gas is less than 10 ppmv VOC as per Method 21.

Viol. Moderate
 Classification:
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 Rqmt Prov: OP 3(A)(iv)(1)
 Description: Failed to conduct visible emissions observations each calendar quarter for seven RICE vents.

Viol. Minor
 Classification:
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 Description: Failure to include item Nos. 1-25 in this letter on deviation reports beginning with the submittals dated 1/30/19 for the reporting period ending 12/31/18.
 Disclosure Date: 01/23/2025

Viol. Minor
 Classification:
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 Rqmt Prov: OP GTC
 Description: Failed to submit required OP-CR01 forms with stack test reports.

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
CORPUS CHRISTI LIQUEFACTION, LLC
RN104104716

§ BEFORE THE
§
§ TEXAS COMMISSION ON
§
§ ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2024-1376-AIR-E

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Corpus Christi Liquefaction, LLC (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent presented this Order to the Commission.

The Respondent understands that it has certain procedural rights at certain points in the enforcement process, including the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Order, the Respondent agrees to waive all notice and procedural rights.

It is further understood and agreed that this Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable. The duties and responsibilities imposed by this Order are binding upon the Respondent.

The Commission makes the following Findings of Fact and Conclusions of Law:

I. FINDINGS OF FACT

1. The Respondent owns and operates a liquefied natural gas facility located at 622 Highway 35 in Gregory, San Patricio County, Texas (the "Plant"). The Plant consists or consisted of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
2. During a record review for the Plant conducted from June 5, 2024 through June 19, 2024, an investigator documented that:
 - a. The net heating value of the gas being combusted by the Wet/Dry Gas Flare 1, Emissions Point Number ("EPN") WTDYFLR1, was less than 300 British thermal units per standard cubic foot ("Btu/scf") when the net heating value ranged from 133 Btu/scf to 230 Btu/scf for a total of ten hours on four days from March 20, 2023 to July 10, 2023.
 - b. The net heating value of the gas being combusted by the Wet/Dry Gas Flare 2, EPN WTDYFLR2, was less than 300 Btu/scf when the net heating value ranged from 178 Btu/scf to 299 Btu/scf for a total of four hours on May 19, 2023, August 11, 2023, and December 30, 2023.

3. The Executive Director recognizes that by December 9, 2024, the Respondent updated the environmental alarm logic by changing the alarm for low-BTU from high to critical priority, revised operator actions in response to alarms, updated the distribution list to receive automatic compliance notification alerts, and conducted operator refresher training on permit limitations and low-BTU alarms in a timely manner in order to maintain the net heating value of the gas being combusted at 300 Btu/scf or greater for the Wet/Dry Gas Flare 1, EPN WTDYFLR1, and the Wet/Dry Gas Flare 2, EPN WTDYFLR2.

II. CONCLUSIONS OF LAW

1. As evidenced by Finding of Fact No. 1, the Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. HEALTH & SAFETY CODE ch. 382 and the rules of the TCEQ.
2. As evidenced by Finding of Fact No. 2.a, the Respondent failed to maintain the net heating value of the gas being combusted at 300 Btu/scf or greater if the flare is steam-assisted or air-assisted, in violation of 30 TEX. ADMIN. CODE §§ 101.20(1), 116.115(c), and 122.143(4), 40 CODE OF FEDERAL REGULATIONS ("CFR") § 60.18(c)(3)(ii), New Source Review ("NSR") Permit Nos. 105710 and PSDTX1306M1, Special Conditions ("SC") No. 14.A, Federal Operating Permit ("FOP") No. O3580, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") Nos. 1.A and 9, and TEX. HEALTH & SAFETY CODE § 382.085(b).
3. As evidenced by Finding of Fact No. 2.b, the Respondent failed to maintain the net heating value of the gas being combusted at 300 Btu/scf or greater if the flare is steam-assisted or air-assisted, in violation of 30 TEX. ADMIN. CODE §§ 101.20(1), 116.115(c), and 122.143(4), 40 CFR § 60.18(c)(3)(ii), NSR Permit Nos. 105710 and PSDTX1306M1, SC No. 14.A, FOP No. O3580, GTC and STC Nos. 1.A and 9, and TEX. HEALTH & SAFETY CODE § 382.085(b).
4. Pursuant to TEX. WATER CODE § 7.051, the TCEQ has the authority to assess an administrative penalty against the Respondent for violations of state statutes within the TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
5. An administrative penalty in the amount of \$34,800 is justified by the facts recited in this Order and considered in light of the factors set forth in TEX. WATER CODE § 7.053. The Respondent paid the \$17,400 penalty. Pursuant to TEX. WATER CODE § 7.067, \$17,400 of the penalty shall be conditionally offset by the Respondent's timely and satisfactory completion of a Supplemental Environmental Project ("SEP") as defined in the attached SEP Agreement ("Attachment A", incorporated herein by reference). The Respondent's obligation to pay the conditionally offset portion of the penalty shall be discharged upon full compliance with all the terms and conditions of this Order, which includes the timely and satisfactory completion of all provisions of the SEP Agreement, as determined by the Executive Director.

III. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed a penalty as set forth in Conclusion of Law No. 5 for violations of state statutes and rules of the TCEQ. The payment of this penalty and the Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations that are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Corpus Christi Liquefaction, LLC, Docket No. 2024-1376-AIR-E" to:

Financial Administration Division, Revenue Operations Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088
2. The Respondent shall implement and complete the SEP as set forth in Section I, Conclusion of Law No. 5. The amount of \$17,400 of the assessed penalty is conditionally offset based on the Respondent's implementation and completion of the SEP pursuant to the terms of the SEP Agreement, as defined in Attachment A. Penalty payments for any portion of the SEP deemed by the Executive Director as not complete shall be paid within 30 days after the date the Executive Director demands payment.
3. All relief not expressly granted in this Order is denied.
4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Plant operations referenced in this Order.
5. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms in this Order.
7. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
8. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the

terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.

9. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
10. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Krista Mello-Jurack

For the Executive Director

Date

08/01/2025

Date

I, the undersigned, have read and understand the attached Order. I am authorized to agree to the attached Order, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this Order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the OAG for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the OAG of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

Nishita Singh

Signature

Nishita Singh

Name (Printed or typed)
Authorized Representative of
Corpus Christi Liquefaction, LLC

04/29/25

Date

VP/GM

Title

☐ If mailing address has changed, please check this box and provide the new address below:

Instructions: Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.

Attachment A
Docket Number: 2024-1376-AIR-E
SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	Corpus Christi Liquefaction, LLC
Payable Penalty Amount:	\$34,800
SEP Offset Amount:	\$17,400
Type of SEP:	Contribution to a Third-Party Pre-Approved SEP
Third-Party Administrator:	Texas A&M University – Corpus Christi
Project Name:	<i>AutoCheck</i>
Total Project Budget	\$401,615
Location of SEP:	Aransas, Bee, Brooks, Calhoun, DeWitt, Duval, Goliad, Gonzales, Jackson, Jim Wells, Kenedy, Kleberg, Lavaca, Live Oak, McMullen, Nueces, Refugio, San Patricio, and Victoria Counties

The Texas Commission on Environmental Quality (“TCEQ”) agrees to offset a portion of the administrative penalty amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project (“SEP”). The offset is equal to the SEP Offset Amount set forth above and is conditioned upon compliance with the terms of this Attachment A.

1. Project Description

A. Project

The Respondent shall contribute the SEP Offset Amount to the **Texas A&M University – Corpus Christi**, as a Third-Party Administrator, for the *Autocheck* project (the “Project”). This Project involves events for vehicle owners to voluntarily have their vehicles tested and to receive information about their emissions and the clean air benefits of well-maintained vehicles. The testing identifies vehicles with high emissions and maintenance issues that reduce gas mileage and compromise emissions control systems. The Project operates as a voluntary inspection and maintenance program using tools like those used in inspection and maintenance programs in nonattainment areas. The Project will be done in accordance with all federal, state, and local environmental laws and regulations. The contribution will be used in accordance with the SEP Agreement between the Third-Party Administrator and the TCEQ.

All dollars contributed will be used solely for the direct cost of implementing the Project, including for supplies, materials, and equipment. Any portion of this contribution that is not spent on the specifically identified SEP may, at the discretion of the Executive Director (“ED”), be applied to another pre-approved SEP.

The Respondent’s signature affixed to this Agreed Order certifies that the Respondent has no prior commitment to make this contribution and that it is being contributed solely to settle this enforcement action. The Respondent shall not profit in any manner from this SEP.

B. Environmental Benefit

According to local emissions inventories of the Corpus Christi area, approximately 35% of air pollution is caused by vehicles. The vehicle operator may not know that the vehicle is polluting or may not have the resources to have repairs performed on the vehicle to reduce its emissions. This Project addresses emissions by informing motorists if their vehicles are polluting, providing them with information regarding the clean air benefits of a well-maintained vehicle,

and providing resources to repair polluting vehicles to bring them up to clean emissions standards.

C. Minimum Expenditure

The Respondent shall contribute at least the SEP Offset Amount to the Third-Party Administrator and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Offset Amount to the Third-Party Administrator. The Respondent shall make the check payable to **Texas A&M University – Corpus Christi SEP** and shall mail the contribution with a copy of the Agreed Order to:

Trent Thigpen, Program Manager
Pollution Prevention Partnership and AutoCheck
Texas A&M University-Corpus Christi
6300 Ocean Drive, Unit 5854
Corpus Christi, Texas 78412

3. Records and Reporting

Concurrent with the payment of the SEP Offset Amount, the Respondent shall provide the Enforcement SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Offset Amount to the Third-Party Administrator. The Respondent shall mail or email a copy of the check and transmittal letter to:

Texas Commission on Environmental Quality
Enforcement Division
Attention: SEP Coordinator, MC 219
P.O. Box 13087
Austin, Texas 78711-3087
SEPReports@tceq.texas.gov

4. Failure to Fully Perform

If the Respondent does not perform its obligations under this Attachment A, including full expenditure of the SEP Offset Amount and submittal of the required reporting described in Sections 2 and 3 above, the ED may require immediate payment of all or part of the SEP Offset Amount.

In the event the ED determines that the Respondent failed to fully implement and complete the Project, the Respondent shall remit payment for all or a portion of the SEP Offset Amount, as determined by the ED, and as set forth in the attached Agreed Order. After receiving notice of failure to complete the SEP, the Respondent shall include the docket number of the attached Agreed Order and a note that the enclosed payment is for the reimbursement of a SEP; shall make the check payable to “Texas Commission on Environmental Quality;” and shall mail it to:

Texas Commission on Environmental Quality
Litigation Division
Attention: SEP Coordinator, MC 175
P.O. Box 13087
Austin, Texas 78711-3087

5. Publicity

Any public statements concerning this SEP and/or project, made by or on behalf of the Respondent must include a clear statement that **the project was performed as part of the settlement of an enforcement action brought by the TCEQ**. Such statements include advertising, public relations, and press releases.

6. Recognition

The Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

The SEP Offset Amount identified in this Attachment A and in the attached Agreed Order has not been, and shall not be, included as a SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.