

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

**VENTURE GLOBAL CALCASIEU PASS,
LLC
TRANSCAMERON PIPELINE, LLC**

AI # 194203

**PROCEEDINGS UNDER THE LOUISIANA
ENVIRONMENTAL QUALITY ACT
LA. R.S. 30:2001, ET SEQ.**

* **Settlement Tracking No.**
* **SA-AE-25-0093**
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* **Enforcement Tracking Nos.**
* **AE-CN-22-00367**
* **AE-CN-22-00367A**
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* **Docket No. 2024-50286-DEQ**
* **Consolidated With 2025-13307-DEQ**
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SETTLEMENT AGREEMENT

The following Settlement Agreement is hereby agreed to between Venture Global Calcasieu Pass, LLC and TransCameron Pipeline, LLC (“Respondents”) and the Department of Environmental Quality (“DEQ” or “the Department”), under authority granted by the Louisiana Environmental Quality Act, La. R.S. 30:2001, et seq. (“the Act”).

I

Respondents are limited liability companies that own and/or operate a liquefied natural gas production, storage, and export terminal located in Cameron, Cameron Parish, Louisiana (“the Facility”).

II

On June 29, 2023, the Department issued to Respondents a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement Tracking No. AE-CN-22-00367 (Exhibit 1).

On May 9, 2025, the Department issued to Respondents an Amended Consolidated Compliance Order & Notice of Potential Penalty, Enforcement Tracking No. AE-CN-22-00367A

(Exhibit 2).

III

In response to the Consolidated Compliance Orders & Notices of Potential Penalty, Respondents made timely requests for a hearing.

IV

Respondents deny they committed any violations or that it is liable for any fines, forfeitures and/or penalties.

V

Nonetheless, Respondents, without making any admission of liability under state or federal statute or regulation, agree to pay, and the Department agrees to accept, a payment in the amount of TWO HUNDRED FORTY-FIVE THOUSAND AND NO/100 DOLLARS (\$245,000.00), of which Twelve Thousand Four Hundred Ninety-One and 43/100 Dollars (\$12,491.43) represents the Department's enforcement costs, in settlement of the claims set forth in this Settlement Agreement. The total amount of money expended by Respondents on cash payments to the Department as described above, shall be considered a civil penalty for tax purposes, as required by La. R.S. 30:2050.7(E)(1).

VI

Respondents further agree that the Department may consider the inspection report(s), permit record(s), the Consolidated Compliance Order & Notice of Potential Penalty, Amended Consolidated Compliance Order & Notice of Potential Penalty and this Settlement Agreement for the purpose of determining compliance history in connection with any future enforcement or permitting action by the Department against Respondents, and in any such action Respondents shall be estopped from objecting to the above-referenced documents being considered as proving

the violations alleged herein for the sole purpose of determining Respondents' compliance history.

VII

This Settlement Agreement shall be considered a final order of the Secretary for all purposes, including, but not limited to, enforcement under La. R.S. 30:2025(G)(2), and Respondents hereby waive any right to administrative or judicial review of the terms of this agreement, except such review as may be required for interpretation of this Settlement Agreement in any action by the Department to enforce this Settlement Agreement.

VIII

This Settlement Agreement is being made in the interest of settling the state's claims and avoiding for both parties the expense and effort involved in litigation or an adjudicatory hearing. In agreeing to the compromise and Settlement Agreement, the Department considered the factors for issuing civil penalties set forth in La. R.S. 30:2025(E) of the Act.

IX

As required by law, the Department has submitted this Settlement Agreement to the Louisiana Attorney General for approval or rejection. The Attorney General's concurrence is appended to this Settlement Agreement.

X

The Respondents have caused a public notice advertisement to be placed in the official journal of the parish governing authority in Cameron Parish, Louisiana. The advertisement, in form and wording approved by the Department, announced the availability of this Settlement Agreement for public view and comment and the opportunity for a public hearing. Respondents have submitted an original proof-of-publication affidavit and an original public notice to the Department and, as of the date this Settlement Agreement is executed on behalf of the Department,

more than forty-five (45) days have elapsed since publication of the notice.

XI

Payment is to be made within thirty (30) days from notice of the Secretary's signature. If payment is not received within that time, this Settlement Agreement is voidable at the option of the Department. The Respondents shall provide their tax identification number when submitting payment. Payments are to be made by check, payable to the Department of Environmental Quality, and mailed or delivered to the attention of Accounts Receivable, Financial Services Division, Department of Environmental Quality, Post Office Box 4303, Baton Rouge, Louisiana, 70821-4303 or by Electronic Funds Transfer (EFT) to the Department of Environmental Quality, in accordance with instructions provided to Respondents by the Financial Services Division. Each payment shall be accompanied by a completed Settlement Payment Form attached hereto.

XII

In consideration of the above, any claims for penalties are hereby compromised and settled in accordance with the terms of this Settlement Agreement.

XIII

Each undersigned representative of the parties certifies that he or she is fully authorized to execute this Settlement Agreement on behalf of his or her respective party, and to legally bind such party to its terms and conditions.

**VENTURE GLOBAL CALCASIEU
PASS, LLC
TRANSCAMERON PIPELINE, LLC**

BY: _____
(Signature)

(Printed)

TITLE: _____

THUS DONE AND SIGNED in duplicate original before me this _____ day of
_____, 20 _____, at _____.

NOTARY PUBLIC (ID # _____)

(stamped or printed)

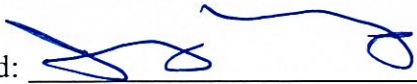
**LOUISIANA DEPARTMENT OF
ENVIRONMENTAL QUALITY**
Courtney J. Burdette, Secretary

BY: _____
Jerrie "Jerry" Lang, Assistant Secretary
Office of Environmental Compliance

THUS DONE AND SIGNED in duplicate original before me this _____ day of
_____, 20 _____, at Baton Rouge, Louisiana.

NOTARY PUBLIC (ID # _____)

(stamped or printed)

Approved: 
Jerrie "Jerry" Lang, Assistant Secretary

JOHN BEL EDWARDS
GOVERNOR



ROGER W. GINGLES
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

JUN 29 2023



CERTIFIED MAIL (7021 1970 0000 3974 0099)
RETURN RECEIPT REQUESTED

VENTURE GLOBAL CALCASIEU PASS, LLC and TRANSCAMERON PIPELINE, LLC
c/o C T Corporation System
Agent for Service of Process
3867 Plaza Tower Drive
Baton Rouge, LA 70816

**RE: CONSOLIDATED COMPLIANCE ORDER
& NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. AE-CN-22-00367
AGENCY INTEREST NO. 194203**

Dear Sir/Madam:

Pursuant to the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is hereby served on **VENTURE GLOBAL CALCASIEU PASS, LLC and TRANSCAMERON PIPELINE, LLC (RESPONDENTS)** for the violations described therein.

Compliance is expected within the maximum time period established by each part of the **COMPLIANCE ORDER**. The violations cited in the **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** could result in the issuance of a civil penalty or other appropriate legal actions.

Any questions concerning this action should be directed to James "Bailey" Macmurdo at (225) 219-2141 or bailey.macmurdo@la.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Angela Marse".

Angela Marse
Administrator
Enforcement Division

AM/JBM/jbm
Alt ID No. 0560-00987
Attachment

- c: Calcasieu Pass Pledgor, LLC
1001 19th Street North, Suite 1500
Arlington, VA 22209

- c: Venture Global Calcasieu Pass, LLC and TransCameron Pipeline, LLC
c/o Andy Vaughan, President, Operations
1001 19th Street North, Suite 1500
Arlington, VA 22209

**STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE**

IN THE MATTER OF

**VENTURE GLOBAL
CALCASIEU PASS, LLC and
TRANSCAMERON PIPELINE, LLC**

**CAMERON PARISH
ALT ID NO. 0560-00987**

**PROCEEDINGS UNDER THE LOUISIANA
ENVIRONMENTAL QUALITY ACT,
La. R.S. 30:2001, ET SEQ.**

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ENFORCEMENT TRACKING NO.

AE-CN-22-00367

AGENCY INTEREST NO.

194203

CONSOLIDATED

COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY

The following **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is issued to **VENTURE GLOBAL CALCASIEU PASS, LLC and TRANSCAMERON PIPELINE, LLC (RESPONDENTS)** by the Louisiana Department of Environmental Quality (the Department), under the authority granted by the Louisiana Environmental Quality Act (the Act), La. R.S. 30:2001, et seq., and particularly by La. R.S. 30:2025(C), 30:2050.2 and 30:2050.3(B).

FINDINGS OF FACT

I.

The Respondents own and/or operate **CALCASIEU PASS LNG PROJECT (FACILITY)**, a liquefied natural gas (LNG) production, storage, and export terminal, located at 671 Davis Road in Cameron, Cameron Parish, Louisiana. The facility operates or has operated under the following Title V and Prevention of Significant Deterioration (PSD) Air Permits:

Air Permit Number	Date Issued	Expiration Date
PSD-LA-805 (M-4)	7/1/2021	---
0560-00987-V4	7/1/2021	9/21/2023
PSD-LA-805 (M-3)	2/2/2021	---
0560-00987-V3	2/2/2021	9/21/2023
PSD-LA-805 (M-2)	2/5/2020	---

Air Permit Number	Date Issued	Expiration Date
0560-00987-V2	2/5/2020	9/21/2023
0560-00987-V1	8/26/2019	9/21/2023
PSD-LA-805 (M-1)	8/26/2019	---
0560-00987-V0	9/21/2018	9/21/2023
PSD-LA-805	9/21/2018	--

II.

On or about March 11, 2022, and June 7, 2023, an inspection and subsequent file review, respectively, of the facility was performed to determine the degree of compliance with the Act and the Air Quality Regulations. While the review is not yet complete, the Department noted the violations found in paragraphs III-VI of the **FINDINGS OF FACT** portion of this **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY**.

III.

On or about January 18, 2022, the Respondents reported an unauthorized discharge (Incident No. T-206737) of natural gas to the atmosphere that occurred from January 15, 2022 through January 17, 2022. On or about January 24, 2022, the Respondents submitted an Unauthorized Discharge Notification Report, which indicated that the Respondents used a procedure that resulted in the preventable release of approximately 180,099 pounds of natural gas (Reportable Quantity: 42,000 pounds) to the atmosphere. Specifically, the discharge occurred during nitrogen displacement activities associated with commissioning of the South LNG Tank. The report stated that the Respondents and their primary contractor developed a procedure for nitrogen displacement activities that initially included directing the vent stream (from purging) to the low-pressure (LP) flare. However, the procedure was amended to provide for venting of nitrogen via a roof vent on the LNG tanks, and the Respondents completed a management of change (MOC) evaluation for the amended procedure. The MOC was approved by operations, commissioning, and engineering. The report additionally stated that the investigation of the incident identified the causes as a combination of a failure in the MOC process, lack of adherence to the procedures, and lack of training. The change of the initial procedure from including the use of the LP Flare to the roof vent, on the South LNG tank, that vented to the atmosphere lead to the preventable and unauthorized release. The failure to diligently maintain in proper working order air pollution control facilities whenever any emissions are being made, which can be controlled by the facility, is a violation of LAC 33:III.905, La. R.S. 30:2057(A)(1), and La. R.S. 30:2057(A)(2). In the response to the Warning Letter dated May 12, 2022, the Respondents identified corrective measures taken including an update to

the MOC process and updated training for operations and commissioning personnel that clearly defines permitted and non-permitted activities. Additionally, the Respondents submitted a Regulatory Permit Application dated February 25, 2022, to authorize venting of natural gas during commissioning of the facility. On March 2, 2022, the Department issued a Regulatory Permit for Release of Natural Gas from Pipelines and Associated Equipment to the Respondents; this permit expired on or about May 2, 2023.

IV.

The Respondents reported the following emission exceedances:

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
1.	Revised 2022 Title V 1st Semiannual Monitoring Report (3/30/2023) Electronic correspondence dated 6/21/2023	0560- 00987-V4	Hot Oil Heater 1 (EQT 0006)	4/15/2022 [5 hours (hrs.)]	NOx [4.82 pounds/hour (lbs./hr.)]	4.90–4.95	The hot oil heaters are a custom design solution for the facility, and since initial startup they have experienced unexpected outages. These outages were caused primarily by a design issue associated with the furnace assembly whereby heated flue gas was misdirected onto several heater instruments, resulting in the instruments overheating, which then caused the hot oil heater to trip.	The Respondents worked with the manufacturer of the hot oil heaters to replace parts and implemented mitigation measures to reduce emissions. The Respondents submitted an application to the Department for the Renewal and Significant Modification of the Title V Permit on March 17, 2023, to update the maximum hourly emission rate. In electronic correspondence dated 6/21/2023, the Respondents reported all repairs were completed by the end of August 2022.

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
2.	Revised 2022 Title V 1st Semiannual Monitoring Report (3/30/2023) Electronic correspondence dated 6/21/2023	0560- 00987-V4	EQI 0006	4/15/2022– 5/1/2022 (65 hrs.)	CO (10.43 lbs./hr.)	10.44–11.05	The hot oil heaters are a custom design solution for the facility, and since initial startup, they have experienced unexpected outages. These outages were caused primarily by a design issue associated with the furnace assembly whereby heated flue gas was misdirected onto several heater instruments, resulting in the instruments overheating, which then caused the hot oil heater to trip.	The Respondents worked with the manufacturer of the hot oil heaters to replace parts and implemented mitigation measures to reduce emissions. The Respondents submitted an application to the Department for the Renewal and Significant Modification of the Title V Permit on March 17, 2023, to update the maximum hourly emission rate. In electronic correspondence dated 6/21/2023, the Respondents reported all repairs were completed by the end of August 2022.
3.				4/15/2022– 5/1/2022 (48 hrs.)	PM (0.95 lbs./hr.)	0.96–1.0		
4.				4/15/2022– 5/1/2022 (58 hrs.)	VOC * (0.68 lbs./hr.)	0.69–0.72		
5.			Hot Oil Heater 2 (EQI 0007)	4/16/2022 (4 hrs.)	NOx (4.82 lbs./hr.)	6.12–6.32		
6.				2/26/2022– 4/28/2022 (87 hrs.)	CO (10.43 lbs./hr.)	10.44–11.24		
7.				4/16/2022– 4/28/2022 (74 hrs.)	PM (0.95 lbs./hr.)	0.96–1.02		
8.				4/16/2022– 4/28/2022 (81 hrs.)	VOC * (0.68 lbs./hr.)	0.69–0.74		
9.			Hot Oil Heater 3 (EQI 0008)	3/1/2022– 6/14/2022 (29 hrs.)	NOx (4.82 lbs./hr.)	4.92–6.76		
10.				1/22/2022– 6/14/2022 (212 hrs.)	CO (10.43 lbs./hr.)	10.44–14.66		
11.				1/26/2022– 6/14/2022 (175 hrs.)	PM (0.95 lbs./hr.)	0.96–1.33		
12.				1/22/2022– 6/14/2022 (202 hrs.)	VOC * (0.68 lbs./hr.)	0.69–0.96		
13.			Hot Oil Heater 4 (EQI 0009)	3/19/2022– 4/16/2022 (60 hrs.)	NOx (4.82 lbs./hr.)	4.85–5.35		
14.				3/19/2022– 5/1/2022 (211 hrs.)	CO (10.43 lbs./hr.)	10.44–12.01		
15.				3/19/2022– 5/1/2022 (177 hrs.)	PM (0.95 lbs./hr.)	0.96–1.09		
16.				3/19/2022– 5/1/2022 (203 hrs.)	VOC * (0.68 lbs./hr.)	0.69–0.79		

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
17.	Revised 2022 Title V 1st Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	Simple Cycle Combustion Turbine I (EQT 0034)	3/7/2022 (1 hr.)	NOx (42 lbs./hr.)	176.96	While commissioning the liquefaction facility, an upset occurred, resulting in EQT 0034 dropping into extended lean-lean operating mode.	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and EQT 0034 was returned to emissions compliance. The EMS became available in November 2022 and will minimize trips of the turbines. and will ensure the turbines operate within MECL and within pre-mix operating mode.
18.				3/7/2022 (2 hrs.)		182.37; 43.11		
19.				3/9/2022 (1 hr.)	CO (52.91 lbs./hr.)	160.76	While commissioning the liquefaction facility, an upset occurred, resulting in EQT 0034 dropping into extended lean-lean operating mode, followed by a blackout.	
20.				3/11/2022 (3 hrs.)	NOx (42 lbs./hr.)	296.65; 296.65; 123.18	While commissioning the facility, an upset occurred, resulting in a load swing in EQT 0034 causing the turbine to drop below minimum emissions- compliant load (MECL).	
21.				3/15/2022 (3 hrs.)		115.21; 151.44; 94.19	While commissioning the facility, an upset occurred, resulting in EQT 0034 dropping into extended. lean-lean operating mode.	
22.				3/20/2022 (1 hr.)		86.63		
23.				3/30/2022 (2 hrs.)		151.48; 42.67		
24.				4/5/2022 (2 hrs.)		125.58; 44.65		
25.				4/9/2022 (2 hrs.)		64.4; 184.89		

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
26.	Revised 2022 Title V 1st Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	EQT 0034	4/10/2022 (2 hrs.)	NOx (42 lbs./hr.)	53.32; 137.65	While commissioning the facility, an upset occurred, resulting in a reduction in power and EQT 0034 dropping below MECL.	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and EQT 0034 was returned to emissions compliance. The EMS became available in November 2022 and will minimize trips of the turbines, and will ensure the turbines operate within MECL and within premix operating mode.
27.				4/12/2022 (2 hrs.)		173.41; 42.8	While commissioning the liquefaction facility, an upset occurred due to a failed communication card which resulted in EQT 0034 dropping into extended lean-lean operating mode.	
28.				4/13/2022 (1 hr.)		55.74	While commissioning the liquefaction facility, an upset occurred resulting EQT 0034 dropping into extended lean-lean operating mode.	
29.				4/22/2022 (1 hr.)		58.42		
30.				6/3/2022 (1 hr.)		42.17		
31.				6/29/2022 (1 hr.)		53.75		
32.				6/30/2022 (1 hr.)		64.69		

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
33.	Revised 2022 Title V 1st Semiannual Monitoring Report (3/30/2023)	PSD-LA- 805 (M-4)	EQT 0034	3/22/2022- 5/26/2022 (76 hrs.)	VOC (2 lbs./hr. 3-hr. average during normal operation)	2.01-2.15	Based on further review of fuel flow rates and high heating values, the VOC emissions exceeded the permit limit.	In correspondence dated October 4, 2022, the Respondents reported that EQT 0034 is no longer operational as of July 16, 2022. The turbine has been converted to the currently permitted, permanent, combined cycle operating mode.
34.				3/3/2022- 5/26/2022 (82 hrs.)	VOC * (2 lbs./hr.)	2.01-2.24		
35.		0560- 00987-V4	Simple Cycle Combustion Turbine 2 (EQT 0035)	3/18/2022 (1 hr.)	NOx (42 lbs./hr.)	51.92	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in EQT 0035 dropping into extended lean- lean operating mode.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted and EQT 0035 was returned to emissions compliance. The EMS became available in November 2022 and will minimize trips of the turbines and will ensure the turbines operate within MECL and within pre-mix operating mode.
36.				3/29/2022 (2 hrs.)		46.95; 115.98		
37.				3/30/2022 (1 hr.)		76.53	While commissioning the liquefaction facility, an upset occurred due to instrumentation failure, resulting in EQT 0035 dropping into extended lean- lean operating mode.	

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
38.	Revised 2022 Title V 1st Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	EQT 0035	4/5/2022 (1 hr.)	NOx (42 lbs./hr.)	69.72	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in EQT 0035 dropping into extended lean-lean operating mode.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted and EQT 0035 was returned to emissions compliance. The EMS became available in November 2022 and will minimize trips of the turbines, and will ensure the turbines operate within MECL and within premix operating mode.
39.				4/9/2022 (2 hrs.)		70.07; 302.74	While commissioning the liquefaction facility, an upset occurred due to instrumentation failure, resulting in EQT 0035 dropping into extended lean-lean operating mode.	
40.				4/10/2022 (3 hrs.)		117.91; 202.20; 241.37	While commissioning the liquefaction facility, an upset occurred, resulting in a reduction in power and EQT 0035 dropping below MECL.	

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
41.	Revised 2022 Title V 1st Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	EQT 0035	4/12/2022 (2 hrs.)	NOx (42 lbs./hr.)	332.60; 94.02	While commissioning the liquefaction facility, an upset occurred due to a failed communication card, resulting in EQT 0035 dropping into extended, lean- lean operating mode.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted and EQT 0035 was returned to emissions compliance. The EMS became available in November 2022 and will minimize trips of the turbines and will ensure the turbines operate within MECL and within premix operating mode.
42.				4/28/2022 (1 hr.)		55.43	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in EQT 0035 dropping into extended, lean- lean operating mode.	
43.				5/9/2022 (1 hr.)		56.57		
44.		PSD-LA- 805 (M-4)		5/6/2022 (1 hr.)	CO (52.91 lbs./hr.)	67.94	While commissioning the liquefaction facility, an upset occurred and EQT 0035 tripped.	
45.					CO (47.0 lbs./hr. 1-hr. average during shutdown)			
46.				0560- 00987-V4	5/6/2022 (1 hr.)	CO (52.91 lbs./hr.)		
47.		PSD-LA- 805 (M-4)		CO (47.0 lbs./hr. 1-hr. average during shutdown)				

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
48.	Revised 2022 Title V 1st Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	EQT 0035	5/7/2022 (2 hrs.)	NOx (42 lbs./hr.)	164.48; 242.91	While commissioning the liquefaction facility, an upset occurred and tripped EQT 0035, followed by a power outage (blackout).	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted and EQT 0035 was returned to emissions compliance. The EMS became available in November 2022 and will minimize trips of the turbines, and will ensure the turbines operate within MECL and within premix operating mode.
49.		PSD-LA- 805 (M-4)			NOx (121.0 lbs./hr. 1-hr. average during shutdown)			
50.		PSD-LA- 805 (M-4)		3/26/2022– 5/26/2022 (13 hrs.)	VOC (2 lbs./hr. 3-hr. average during normal operation)	2.01–2.04	Based on further review of fuel flow rates and high heating values, the VOC emissions exceeded the permit limit.	In correspondence dated October 4, 2022, the Respondents reported that EQT 0035 is no longer operational as of August 6, 2022. The turbine has been converted to the currently permitted, permanent, combined cycle operating mode.
51.		0560- 00987-V4		3/26/2022– 5/26/2022 (21 hrs.)	VOC * (2 lbs./hr.)	2.01–2.14		

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action	
52.	Revised 2022 Title V 1st Semiannual Monitoring Report (3/30/2023)	PSD-LA-805 (M-4)	Simple Cycle Combustion Turbine 3 (EQT 0036)	3/24/2022– 4/29/2022 (99 hrs.)	VOC (2 lbs./hr. 3-hr. average during normal operation)	2.01–2.21	Based on further review of fuel flow rates and high heating values, the VOC emissions exceeded the permit limit.	In correspondence dated October 4, 2022, the Respondents reported that EQT 0036 is no longer operational as of August 29, 2022. The turbine has been converted to the currently permitted, permanent, combined cycle operating mode.	
53.				3/24/2022– 5/7/2022 (100 hrs.)	VOC * (2 lbs./hr.)	2.01–2.27			
54.		0560- 00987-V4			3/7/2022 (2 hrs.)	NOx (42 lbs./hr.)	51.3; 101.11	While commissioning the liquefaction facility, an upset occurred due to an instrumentation trip, resulting in EQT 0036 going into full speed no load (FSNL) operating mode.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted and EQT 0036 was returned to emissions compliance. The EMS became available in November 2022 and will minimize trips of the turbines and will ensure the turbines operate within MECL and within premix operating mode.
55.					3/7/2022 (2 hrs.)		132.29; 173.96		
56.							3/11/2022 (3 hrs.)	326.83; 333.13; 77.77	

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
57.	Revised 2022 Title V 1st Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	EQT 0036	3/15/2022 (1 hr.)	NOx (42 lbs./hr.)	52.81	While commissioning the liquefaction facility, an upset occurred that caused EQT 0035 to trip, resulting in EQT 0036 going into FSNL operating mode.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted and EQT 0036 was returned to emissions compliance. The EMS became available in November 2022 and will minimize trips of the turbines and will ensure the turbines operate within MECL and within premix operating mode.
58.				3/15/2022 (2 hrs.)	CO (52.91 lbs./hr.)	55.34; 65.74		
59.				3/17/2022 (1 hr.)	NOx (42 lbs./hr.)	194.24	While commissioning the liquefaction facility, an upset occurred due to an equipment failure, resulting in EQT 0036 dropping into extended lean- lean operating mode.	
60.				3/18/2022 (1 hr.)		116.56	While commissioning the liquefaction facility, a process unit tripped, resulting in EQT 0036 dropping into extended lean-lean operating mode.	

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
61.	Revised 2022 Title V 1st Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	EQT 0036	3/22/2022 (2 hrs.)	NOx (42 lbs./hr.)	121.68; 136.49	While commissioning the liquefaction facility, an upset occurred due to an instrumentation failure, resulting in EQT 0036 dropping below MECL.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted and EQT 0036 was returned to emissions compliance. The EMS became available in November 2022 and will minimize trips of the turbines and will ensure the turbines operate within MECL and within premix operating mode.
62.				3/22/2022 (2 hrs.)		167.15; 157.33	While commissioning the liquefaction facility, an upset occurred, resulting in EQT 0036 dropping into extended lean-lean operating mode	
63.				3/29/2022 (1 hr.)		181.88	While commissioning the liquefaction facility, an instrumentation failure occurred, resulting in EQT 0036 dropping below MECL.	
64.				4/3/2022 (1 hr.)		148.90	While commissioning the liquefaction facility, an upset occurred, resulting in EQT 0036 dropping below MECL.	

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
65.	Revised 2022 Title V 1st Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	EQT 0036	4/4/2022 (1 hr.)	NOx (42 lbs./hr.)	57.02	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in EQT 0036 dropping into extended lean- lean operating mode.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted and EQT 0036 was returned to emissions compliance. The EMS became available in November 2022 and will minimize trips of the turbines and will ensure the turbines operate within MECL and within premix operating mode.
66.				4/5/2022 (2 hrs.)		95.27; 103.57		
67.				4/10/2022 (3 hrs.)		116.58; 355.72; 49.29	While commissioning the liquefaction facility, an upset occurred, resulting in a reduction in power and EQT 0036 dropping below MECL.	
68.				4/12/2022 (2 hrs.)		291.42; 177.95	While commissioning the liquefaction facility, an upset occurred due to a failed communication card, resulting in EQT 0036 dropping into extended lean- lean operating mode.	

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
69.	Revised 2022 Title V 1st Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	EQT 0036	4/22/2022 (1 hr.)	NOx (42 lbs./hr.)	58.29	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in EQT 0036 dropping into extended lean- lean operating mode.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted and EQT 0036 was returned to emissions compliance. The EMS became available in November 2022 and will minimize trips of the turbines and will ensure the turbines operate within MECL and within premix operating mode.
70.				6/2/2022 (1 hr.)		124.43	While commissioning the liquefaction facility, an upset occurred, resulting in EQT 0036 dropping into extended. lean-lean operating mode.	
71.				6/3/2022 (1 hr.)		128.77		

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
72.	Revised 2022 Title V 1st Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	Smaller Aero- derivative Simple Cycle Combustion Turbine 1 with Selective Catalytic Reduction (SCR) (EQT 0051)	3/10/2022 (4 hrs.)	NOx (2.65 lbs./hr.)	2.81-4.39	After a cold startup, EQT 0051 experienced an emissions exceedance.	The proper operation of the control device (selective catalytic reduction) was verified, the aqueous ammonia injection components were inspected, and the power output (MW) was adjusted to return EQT 0051 to emissions compliance.
73.				3/12/2022 (2 hrs.)		8.98; 11.94	Due to an equipment upset, the fuel gas operating temperature decreased, which changed the operating mode of EQT 0051.	The fuel gas heater was reset and used to raise the fuel gas temperature, and EQT 0051 was returned to emissions compliance.
74.				3/13/2022 (1 hr.)		2.78	Due to cold weather, an adjustment to the glycol system changed the operating mode of EQT 0051.	The glycol system was readjusted and EQT 0051 was returned to emissions compliance.
75.	2022 Title V 2 nd Semiannual Monitoring Report (3/30/2023)		Combined Cycle Combustion Turbine 1 (EQT 0001)	11/10/2022 (2 hrs.)	NOx (13.80 lbs./hr.)	147.71; 96.21	While commissioning the liquefaction facility, a liquefaction train tripped, resulting in EQT0001 dropping into extended lean- lean operating mode.	Operators performed a high load transfer of EQT0001 and restored the turbine into premix operating mode.

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
76.	2022 Title V 2 nd Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	EQT 0001	11/16/2022 (3 hrs.)	NOx (13.80 lbs./hr.)	70.54; 74.72; 95.72	High level in cold flare knockout drum tripped all 18 liquefaction trains, causing both steam turbines to trip, resulting in EQT 0001 tripping and dropping below MECL.	Operators restored EQT 0001 to MECL.
77.		PSD-LA- 805 (M-4)			NOx (48.7 lbs./hr. 1-hour average during warm start or during shutdown)			
78.		0560- 00987-V4		11/17/2022 (5 hrs.)	NOx (13.80 lbs./hr.)	105.39- 257.24	An extended startup following a facility blackout resulted in EQT 0001 dropping below MECL.	
79.		PSD-LA- 805 (M-4)			NOx (71.0 lbs./hr. 10-hour average during black start)	94.66 (estimated 10-hour average)		
80.		0560- 00987-V4		12.28.2022 (1 hr.)	NOx (13.80 lbs./hr.)	104.45	The black start of the facility after a freeze event resulted in EQT 0001 dropping below MECL.	
81.		PSD-LA- 805 (M-4)			NOx (71.0 lbs./hr. 10-hour average during black start)			

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
82.	2022 Title V 2 nd Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	Combined Cycle Combustion Turbine 2 (EQT 0002)	11/15/2022– 11/16/2022 (12 hrs.)	NOx (13.80 lbs./hr.)	27.48– 111.11	High level in cold flare knockout drum tripped all 18 liquefaction trains causing both steam turbines to trip, resulting in EQT 0002 tripping and dropping below MECL.	Operators restored EQT 0002 to MECL.
83.		PSD-LA- 805 (M-4)			NOx (48.7 lbs./hr. 1-hour average during warm start or during shutdown)			
84.		0560- 00987-V4	Combined Cycle Combustion Turbine 3 (EQT 0003)	12/27/2022– 12/28/2022 (25 hrs.)	NOx (13.80 lbs./hr.)	109.27– 333.87	During the extreme weather conditions (freeze event), blackout, and the black start of the facility, EQT 0002 tripped, resulting in the turbine dropping into extended lean-lean operating mode and experiencing instrumentation issues.	Operators restored EQT 0002 to MECL as soon as practical after the extreme weather event had passed and instrumentation issues were resolved.
85.								

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
86.	2022 Title V 2 nd Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	EQT 0003	11/15/2022– 11/16/2022 (7 hrs.)	NOx (13.80 lbs./hr.)	49.17–63.44	High level in cold flare knockout drum tripped all 18 liquefaction trains causing both steam turbines to trip, resulting in EQT 0003 tripping and dropping below MECL.	Operators restored EQT 0003 to MECL.
87.		PSD-LA- 805 (M-4)			NOx (48.7 lbs./hr. 1-hour average during warm start or during shutdown)			
88.		0560- 00987-V4	Combined Cycle Combustion Turbine 4 (EQT 0004)	12/3/2022– 12/4/2022 (2 hrs.)	NOx (13.80 lbs./hr.)	40.63–42.24	A process upset, resulting in EQT 0003 dropping into extended lean-lean operating mode.	
89.				8/26/2022 (4 hrs.)		64.20–79.91	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in EQT 0004 dropping into extended lean- lean operating mode.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted and EQT 0004 was returned to emissions compliance. The EMS became available in November 2022 and will minimize trips of the turbines and will ensure the turbines operate within MECL and within premix operating mode.

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
90.	2022 Title V 2 nd Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	EQT 0004	9/2/2022 (7 hrs.)	NOx (13.80 lbs./hr.)	52.89– 197.97	The facility experienced a blackout, resulting in EQT 0004 dropping below MECL.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted and EQT 0004 was returned to emissions compliance. The
91.				9/14/2022 (1 hr.)	NOx (13.80 lbs./hr.)	125.41	While commissioning the liquefaction facility, an upset occurred, resulting in EQT 0004 dropping into extended lean-lean operating mode.	EMS became available in November 2022 and will minimize trips of the turbines and will ensure the turbines operate within MECL and within premix operating mode.
92.				11/15/2022– 11/16/2022 (11 hrs.)	NOx (13.80 lbs./hr.)	19.37– 138.82	High levels in the cold flare knockout drum tripped all 18 liquefaction trains, causing both steam turbines to trip.	Operators restored EQT 0004 to MECL.
93.		PSD-LA- 805 (M-4)			NOx (48.7 lbs./hr. 1-hour average during warm start or shutdown)			

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
94.	2022 Title V 2 nd Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	Combined Cycle Combustion Turbine 5 (EQT 0005)	8/24/2022 (2 hrs.)	NOx (13.80 lbs./hr.)	32.15; 370.81	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in EQT 0005 dropping into extended lean- lean operating mode.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted and EQT 0005 was returned to emissions compliance. The EMS became available in November 2022 and will minimize trips of the turbines and will ensure the turbines operate within MECL and within premix operating mode.
95.				8/26/2022 (2 hrs.)	NOx (13.80 lbs./hr.)	87.92; 25.34	While commissioning the liquefaction facility, a liquefaction train tripped, resulting in EQT 0005 dropping into extended lean- lean operating mode.	
96.				9/2/2022 (3 hrs.)	NOx (13.80 lbs./hr.)	20.08–51.25	The facility experienced a blackout, resulting in EQT 0005 dropping below MECL.	
97.				9/14/2022 (1 hr.)	NOx (13.80 lbs./hr.)	20.42	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in EQT 0005 dropping into extended lean- lean operating mode.	

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
98.	2022 Title V 2 nd Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	EQT 0005	12/10/2022 (2 hrs.)	NOx (13.80 lbs./hr.)	57.75-35.35	Equipment malfunction resulted in EQT 0005 dropping into extended, lean-lean operating mode.	Operators performed a high load transfer of EQT 0005 to restore the turbine into premix operating mode.
99.				12/15/2022– 12/20/2022 (5 hrs.)		41.38-74.01		
100.				12/21/2022 (4 hrs.)		18.49– 187.11	A process upset occurred, resulting in EQT 0005 dropping into extended lean- lean operating mode.	
101.				12/22/2022 (9 hrs.)		24.79– 187.11		
102.				12/31/2022 (6 hrs.)		29.9–197.89	During a freeze event, blackout and black start of the facility caused EQT 0005 to trip, and the turbine dropped into lean-lean operating mode, and experienced instrumentation issues.	

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
103.	2022 Title V 2 nd Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	EQT 0006	8/31/2022– 11/22/2022 (7 hrs.)	CO (10.43 lbs./hr.)	10.47–10.76	Fuel flow rate was higher than the current permit basis.	Operators reduced the fuel flow rate to restore EQT 0006 into emission compliance.
104.				8/31/2022– 11/22/2022 (5 hrs.)	PM (0.95 lbs./hr.)	0.96–0.97		
105.				8/31/2022– 11/22/2022 (7 hrs.)	VOC + (0.68 lbs./hr.)	0.69–0.70		
106.			EQT 0007	9/1/2022– 9/7/2022 (3 hrs.)	CO (10.43 lbs./hr.)	10.44–10.57		Operators reduced the fuel flow rate to restore EQT 0007 into emission compliance.
107.				9/1/2022 (1 hr.)	PM (0.95 lbs./hr.)	0.96		
108.				9/1/2022 (1 hr.)	VOC + (0.68 lbs./hr.)	0.69		
109.			EQT 0008	9/7/2022– 12/16/2022 (36 hrs.)	CO (10.43 lbs./hr.)	10.44–12.60		Operators reduced the fuel flow rate to restore EQT 0008 into emission compliance.
110.				9/20/2022– 12/16/2022 (26 hrs.)	PM (0.95 lbs./hr.)	0.96–1.14		
111.				9/7/2022– 12/16/2022 (32 hrs.)	VOC + (0.68 lbs./hr.)	0.69–0.92		
112.			EQT 0009	9/5/2022– 9/8/2022 (40 hrs.)	CO (10.43 lbs./hr.)	10.44–10.96		Operators reduced the fuel flow rate to restore EQT 0009 into emission compliance.
113.				9/5/2022– 9/7/2022 (31 hrs.)	PM (0.95 lbs./hr.)	0.96–0.99		
114.				9/5/2022– 9/7/2022 (38 hrs.)	VOC + (0.68 lbs./hr.)	0.69–0.72		

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
115.	2022 Title V 2 nd Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	EQT 0034	7/7/2022 (1 hr.)	NOx (42.00 lbs./hr.)	60.63	While commissioning the liquefaction facility, a process upset occurred due to equipment tripping, resulting in EQT 0034 dropping into extended, lean- lean operating mode.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted to return EQT 0034 to compliance.
116.			Simple Cycle Combustion Turbine 2 (EQT 0035)	7/16/2022 (1 hr.)	NOx (42.00 lbs./hr.)	46.67	A process upset occurred due to equipment tripping, resulting in EQT 0035 dropping into extended, lean- lean operating mode.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted to return EQT 0035 to compliance.
117.				7/18/2022 (1 hr.)	NOx (42.00 lbs./hr.)	60.28		
118.				7/19/2022 (1 hr.)		43.9; 72.75; 78.25	While starting up EQT 0004, the entire plant tripped, resulting in the flame going out of EQT 0035.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted to return EQT 0035 to compliance.
119.		PSD-LA- 805 (M-4)	EQT 0035	7/19/2022 (1 hr.)	CO (52.91 lbs./hr.)	214.09		
120.				CO (47.0 lbs./hr. 1-hour average during shutdown)				
121.		0560- 00987-V4	EQT 0036	7/20/2022 (4 hrs.)	VOC (2.00 lbs./hr. 3-hr average during normal operation)	2.02–2.22	Based on further review of fuel flow rates and high heating values, the VOC emissions exceeded the permit limit.	Per the letter dated October 4, 2022, EQT 0036 no longer operates in simple cycle mode.
122.				7/20/2022 (1 hr.)	VOC + (2.00 lbs./hr.)	2.13		

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
123.	2022 Title V 2 nd Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	EQT 0036	7/1/2022 (1 hr.)	NOx (42.00 lbs./hr.)	51.41	A process upset occurred due to equipment tripping, resulting in EQT 0036 dropping into extended, lean- lean operating mode.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted to return EQT 0036 to compliance.
124.				7/8/2022 (1 hr.)	NOx (42.00 lbs./hr.)	51.67		
125.				7/18/2022 (1 hr.)	CO (52.91 lbs./hr.)	70.09		
126.				7/18/2022 (2 hrs.)	NOx (42.00 lbs./hr.)	50.30–58.63		
127.				7/19/2022 (1 hr.)	NOx (42.00 lbs./hr.)	55.09	A process upset occurred due to equipment tripping, resulting in EQT 0036 dropping into extended, lean- lean operating mode.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted to return EQT 0036 to compliance.
128.				7/19/2022 (1 hr.)	NOx (42.00 lbs./hr.)	43.72		
129.				7/25/2022 (1 hr.)	NOx (42.00 lbs./hr.)	94.61		
130.				8/17/2022 (1 hr.)	NOx (42.00 lbs./hr.)	53.45		
131.				8/26/2022 (8 hrs.)	NOx (42.00 lbs./hr.)	42.79– 243.08		
132.				8/26/2022 (1 hr.)	CO (52.91 lbs./hr.)	120.50		
133.				8/28/2022 (2 hrs.)	NOx (42.00 lbs./hr.)	63.70–67.67		

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
134.	2022 Title V 2 nd Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	EQT 0051	10/27/2022 (1 hr.)	NOx (2.65 lbs./hr.)	3.31	A process upset occurred due to equipment tripping, resulting in EQT 0051 tripping.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted and EQT 0051 was returned to emissions compliance.
135.				11/17/2022 (10 hrs.)	NOx (2.65 lbs./hr.)	11.84-29.29	High level in the cold flare knockout drum tripped all 18 liquefaction trains causing both steam turbines to trip, which resulted in EQT 0051 tripping and dropping below MECL.	Operators restored EQT 0051 to MECL.
136.		PSD-LA- 805 (M-4)			NOx (15.4 lbs./hr. 2-hour average during cold start)	23.03-28.95 (2-hr. average)		
137.		0560- 00987-V4		12/22/2022 (3 hrs.)	NOx (2.65 lbs./hr.)	2.73-5.17	The combustion chamber inner staging valve position feedback failed, resulting in EQT 0051 operating in Dry- Low Emission Mode.	Operators implemented corrective measures and EQT 0051 was returned to emissions compliance.

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
138.	2022 Title V 2 nd Semiannual Monitoring Report (3/30/2023)	0560- 00987-V4	EQT 0051	12/23/2022– 12/27/2022 (77 hrs.)	NOx (2.65 lbs./hr.)	2.76–40.67	During freeze event, there was a facility blackout and black start event; EQT 0051 tripped multiple times and experienced instrumentation issues.	Operators restored EQT 0051 to MECL after freeze event.
139.		PSD-LA- 805 (M-4)			NOx (15.4 lbs./hr. 2-hour average during cold start)	15.8–20.1 (2-hr. average)		

In the Revised 2022 Title V First Semiannual Monitoring Report and 2022 Title V Second Semiannual Monitoring Report dated March 30, 2023, the Respondents reported "Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)/Toxic Air Pollutants (TAPs)" as the pollutant(s) released; however, the emission permit limits and quantities reported represented VOC emissions only. See the Attachment titled "2022 Exceedances of HAPs and TAPs" for the HAPs/TAPs emission exceedances submitted by a representative of the Respondents on or about June 21, 2023.

Each emission exceedance listed in the table above and the Attachment to this CONOPP is a violation of Title V Air Permit No. 0560-00987-V4 and/or PSD Permit No. PSD-LA-805 (M-4), LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and La. R.S. 30:2057(A)(2).

V.

The Respondents reported the following violations of permitted operating parameters:

	Report (Date)	Permit Number	Emission Source	Incident Date (duration)	Operating Parameter	Reported Cause	Regulatory Or Permit Requirements
1.	2022 Title V 2 nd Semiannual Monitoring Report (3/30/2023)	0560-00987- V4	Warm Flare (EQT 0013) and Cold Flare (EQT 0014)	7/18/2022 (1.7 hours)	Opacity <= 20 percent, except for emissions that have an average opacity in excess of 20 percent for not more than one (1) six (6) minute period in any 60 consecutive minutes;	While commissioning the liquefaction facility, a power outage occurred, resulting in the flare blowers being inoperable, which resulted in visible emissions from the aforementioned air assisted emission points.	Specific Requirements 52 and 59. 40 CFR 60.18(c)(1). LAC 33:III.1311.C
2.				7/18/2022 (0.9 hours)	Design and operate for no visible emissions, as determined by the methods specified in 40 CFR 60.18(f), except for periods not to exceed a total of five (5) minutes during any two (2) consecutive hours.		
3.				7/19/2022 (0.9 hours)			

Each failure to operate according to permitted requirements is a violation of any applicable permit and associated requirement(s) listed above, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and La. R.S. 30:2057(A)(2).

VI.

- A. The Respondents failed to operate the emission sources in accordance with all terms and conditions of Title V Air Permit No. 0560-00987-V4. Specifically, on or about July 27, 2022, the Respondents submitted an unauthorized discharge report, pursuant to LAC 33:III.535 General Condition R, which notified the Department of an unauthorized discharge and emissions exceedance of sulfur dioxide (SO₂) from Hot Oil Heaters 1-4 (EQTs 0006-0009) to the atmosphere. The permitted emission limits, and actual SO₂ emissions in pounds per hour (lbs./hr.), are detailed in the table below:

Emission Source	Incident Date (duration)	Maximum lb./hr. SO ₂ Permit Limit	Maximum lb./hr. SO ₂ Emitted
EQT 0006	5/18/2022- 7/25/2022 (*duration*)	0.08	0.62

Emission Source	Incident Date (duration)	Maximum lb./hr. SO ₂ Permit Limit	Maximum lb./hr. SO ₂ Emitted
EQT 0007	5/18/2022– 7/25/2022 (*duration*)	0.08	0.57
EQT 0008	5/18/2022– 7/25/2022 (*duration*)	0.08	0.56
EQT 0009	5/18/2022– 7/25/2022 (*duration*)	0.08	0.67

In the Revised 2022 Title V First Semiannual Monitoring Report dated March 30, 2023, the Respondents reported the cause of the emission exceedances was pipeline feed gas containing dimethyl sulfide, an odorant. The Respondents stated that their suppliers of the pipeline feed gas are not allowed to add odorants without the express written consent of the Respondents, and stated that “these emission exceedances were upset events” pursuant to LAC 33:III.507.J. The unauthorized discharge, or emission event, began on or about May 18, 2022, and was reportedly discovered by the Respondents on or about July 13, 2022, and emissions exceedances ceased on or about July 25, 2022. Each emission exceedance is a violation of Title V Air Permit No. 0560-00987-V4, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and La. R.S. 30:2057(A)(2). In the Title V Permit Modification, Renewal, and PSD application dated March 17, 2023, the Respondents proposed increasing the maximum hourly SO₂ emission limits for EQT 0006 – EQT 0009 from 0.08 to 0.97 pounds per hour.

- B. In the Revised 2022 Title V First Semiannual Monitoring Report dated March 30, 2023, the Respondents reported the failure to operate the emission sources in accordance with all terms and conditions of the Prevention of Significant Deterioration (PSD) Permit No. PSD-LA-805 (M-4). Specifically, during the SO₂ emission event, beginning on or about May 18, 2022, as described in **FINDINGS OF FACT** Paragraph VI.A, the Respondents failed to comply with the SO₂ Best Available Control Technology (BACT) emission limits for EQT 0006 – EQT 0009 in PSD Permit No. PSD-LA-805 (M-4). On or about June 14, 2023, the Department requested records of the fuel analyses for EQTs 0006–0009 from May 1, 2022, through July 30, 2022. In electronic correspondence dated June 21, 2023, the Respondents provided the actual average SO₂ emission rates for each

fuel sampling event from May 5, 2022 – July 27, 2022. The events in which the actual SO₂ emission rates exceeded the BACT limit for low sulfur fuel gas for EQT 0006 – EQT 0009 are listed in the table below.

Emission Sources	Permit Number	Sampling Event Date	SO ₂ BACT Limit (lb./MMBtu 3-hr. average)	Actual SO ₂ Quantity (lb./MMBtu 3-hr. average)
EQT 0006 EQT 0007 EQT 0008 EQT 0009	PSD-LA-805 (M-4)	5/18/2022	0.0006	0.0028
		5/25/2022		0.0022
		6/1/2022		0.0027
		6/8/2022		0.0018
		6/15/2022		0.0035
		6/22/2022		0.0018
		6/29/2022		0.0017
		7/6/2022		0.0039
		7/13/2022		0.0009
		7/20/2022		0.0035
		7/22/2022		0.0020

The failure to operate the emission sources in accordance with all terms and conditions of the PSD Permit No. PSD-LA-805 (M-4) is a violation of LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2). In the Title V Permit Modification, Renewal, and PSD application dated March 17, 2023, the Respondents proposed increasing the SO₂ BACT emission limits for the Hot Oil Heaters from 0.0006 to 0.0071 lb./MMBtu based on a 3-hour average.

- C. The Respondents failed to timely submit a written report for any emission in excess of permit emission limitations where such emission occurs over a period of seven (7) days or longer. Pursuant to LAC 33:III.535 General Condition R.2, such reports shall be submitted no later than 14 days from the initial occurrence of the release event. Specifically, the Respondents experienced an exceedance of the SO₂ hourly maximum limits Title V Air Permit No. 0560-00987-V4 and the SO₂ BACT emission limits in PSD Permit No. PSD-LA-805 (M-4), as described in Findings of Fact Paragraph VI.A - B from

May 18, 2022 – July 25, 2022; however, this exceedance was not reported to the Department until July 27, 2022, approximately 56 days late. In the unauthorized discharge report dated July 27, 2022, the Respondents reported that this exceedance was discovered on July 13, 2022; however, in electronic correspondence dated June 21, 2023, the Respondents provided the results for weekly fuel sampling and analysis for the Hot Oil Heaters, which indicated exceedances of the emission limits for all 11 fuel sampling events conducted from May 18, 2022 – July 22, 2022. The failure to timely report any emission in excess of permit emission limitations where such emission occurs over a period of seven (7) days or longer is a violation of LAC 33.III.535 General Condition R.2, Specific Requirement 120 of Title V Air Permit No. 0560-00987-V4, and La. R.S. 30:2057(A)(2).

COMPLIANCE ORDER

Based on the foregoing, the Respondents are **hereby ordered**:

I.

To take, immediately upon receipt of this **COMPLIANCE ORDER**, any and all steps necessary to meet and maintain compliance with the Act, the Air Quality Regulations, and all applicable permits.

II.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written plan detailing steps the Respondents will take and implement to maintain compliance with the emission limits and operating parameters in Title V Air Permit No. 0560-00987-V4 and PSD Permit No. PSD-LA-805 (M-4), as mentioned in Paragraphs IV and V of the **FINDINGS OF FACT** portion of this **COMPLIANCE ORDER**. In the Title V Permit Modification, Renewal, and PSD application dated March 17, 2023, the Respondents proposed to increase some criteria pollutant, HAPs, TAPs, and BACT emissions limitations; however, to date, the Department has not taken final action on the permit modification application.

III.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report that includes the duration of the cited violations, as denoted by the asterisks: *duration*, as referenced in Paragraph VI.A of the **FINDINGS OF FACT** portion of this **COMPLIANCE ORDER**.

IV.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a plan or updated fuel analysis plan which includes measures to be taken to prevent reoccurrence of the violations described in Findings of Fact paragraphs VI.A-C, including how the Respondents will timely identify and notify the Department if fuel provided to the Respondents does not comply with BACT emissions limitations for the Hot Oil Heaters.

V.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, revised Title V Semiannual Monitoring Reports for the January 1, 2022, through June 30, 2022, and July 1, 2022, through December 31, 2022, reporting periods. The revised Title V Semiannual Monitoring Reports shall specify all instances of deviation(s) from permit requirement(s) during the reporting period(s), including, but not to be limited to, each individual permit limit exceedance of distinct HAPs and/or TAPs.

VI.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a revised Title V Annual Compliance Certification for the January 1, 2022, through December 31, 2022, reporting period. The revised Title V Annual Compliance Certification may reference the date and report of the revised Title V Semiannual Monitoring Reports submitted pursuant to Paragraph V of this **COMPLIANCE ORDER**.

VII.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report that includes a detailed description of the circumstances surrounding the cited violations and actions taken or to be taken to achieve compliance with the Order Portion of this **COMPLIANCE ORDER**. This report and all other reports or information required to be submitted to the Enforcement Division by this **COMPLIANCE ORDER** shall be submitted to:

Office of Environmental Compliance
Post Office Box 4312
Baton Rouge, Louisiana 70821-4312
Attn: Bailey Macmurdo
Re: Enforcement Tracking No. AE-CN-22-00367
Agency Interest No. 194203

THE RESPONDENTS SHALL FURTHER BE ON NOTICE THAT:

I.

The Respondents have a right to an adjudicatory hearing on a disputed issue of material fact or of law arising from this **COMPLIANCE ORDER**. This right may be exercised by filing a written request with the Secretary no later than thirty (30) days after receipt of this **COMPLIANCE ORDER**.

II.

The request for an adjudicatory hearing shall specify the provisions of the **COMPLIANCE ORDER** on which the hearing is requested and shall briefly describe the basis for the request. This request should reference the Enforcement Tracking Number and Agency Interest Number, which are located in the upper right-hand corner of the first page of this document and should be directed to the following:

Department of Environmental Quality
Office of the Secretary
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302
Attn: Hearings Clerk, Legal Division
Re: Enforcement Tracking No. AE-CN-22-00367
Agency Interest No. 194203

III.

Upon the Respondents' timely filing a request for a hearing, a hearing on the disputed issue of material fact or of law regarding this **COMPLIANCE ORDER** may be scheduled by the Secretary of the Department. The hearing shall be governed by the Act, the Administrative Procedure Act (La. R.S. 49:950, et seq.), and the Division of Administrative Law (DAL) Procedural Rules. The Department may amend or supplement this **COMPLIANCE ORDER** prior to the hearing, after providing sufficient notice and an opportunity for the preparation of a defense for the hearing.

IV.

This **COMPLIANCE ORDER** shall become a final enforcement action unless the request for hearing is timely filed. Failure to timely request a hearing constitutes a waiver of the Respondents' right to a hearing on a disputed issue of material fact or of law under Section 2050.4 of the Act for the violation(s) described herein.

V.

The Respondents' failure to request a hearing or to file an appeal or the Respondents' withdrawal of a request for hearing on this **COMPLIANCE ORDER** shall not preclude the Respondents from contesting the findings of facts in any subsequent penalty action addressing the same violation(s), although

the Respondents are estopped from objecting to this **COMPLIANCE ORDER** becoming a permanent part of their compliance history.

VI.

Civil penalties of not more than twenty-seven thousand five hundred dollars (\$27,500) for each day of violation for the violation(s) described herein may be assessed. For violations which occurred on August 15, 2004, or after, civil penalties of not more than thirty-two thousand five hundred dollars (\$32,500) may be assessed for each day of violation. The Respondents' failure or refusal to comply with this **COMPLIANCE ORDER** and the provisions herein will subject the Respondents to possible enforcement procedures under La. R.S. 30:2025, which could result in the assessment of a civil penalty in an amount of not more than fifty thousand dollars (\$50,000) for each day of continued violation or noncompliance.

VII.

For each violation described herein, the Department reserves the right to seek civil penalties in any manner allowed by law, and nothing herein shall be construed to preclude the right to seek such penalties.

NOTICE OF POTENTIAL PENALTY

I.

Pursuant to La. R.S. 30:2050.3(B), you are hereby notified that the issuance of a penalty assessment is being considered for the violation(s) described herein. Written comments may be filed regarding the violation(s) and the contemplated penalty. If you elect to submit comments, it is requested that they be submitted within ten (10) days of receipt of this notice.

II.

Prior to the issuance of additional appropriate enforcement action(s), you may request a meeting with the Department to present any mitigating circumstances concerning the violation(s). If you would like to have such a meeting, please contact James "Bailey" Macmurdo at (225) 219-2141 within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**.

III.

The Department is required by La. R.S. 30:2025(E)(3)(a) to consider the gross revenues of the Respondents and the monetary benefits of noncompliance to determine whether a penalty will be assessed and the amount of such penalty. Please forward the Respondents' most current annual gross revenue statements along with a statement of the monetary benefits of noncompliance for the cited violation(s) to the above named contact person within ten (10) days of receipt of this **NOTICE OF POTENTIAL**

PENALTY. Include with your statements of monetary benefits the method(s) you utilized to arrive at the sum. If you assert that no monetary benefits have been gained, you are to fully justify that statement. If the Respondents choose not to submit the requested most current annual gross revenues statement within ten (10) days, it will be viewed by the Department as an admission that the Respondents have the ability to pay the statutory maximum penalty as outlined in La. R.S. 30:2025.

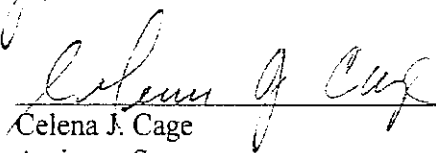
IV.

The Department assesses civil penalties based on LAC 33:I.Subpart1.Chapter7. To expedite closure of this **NOTICE OF POTENTIAL PENALTY** portion, the Respondents may offer a settlement amount to resolve any claim for civil penalties for the violation(s) described herein. The Respondents may offer a settlement amount, but the Department is under no obligation to enter into settlement negotiations. The decision to proceed with a settlement is at the discretion of the Department. The settlement offer amount may be entered on the attached "**CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE**" form. The Respondents may submit the settlement offer within one hundred and eighty (180) days of receipt of this **NOTICE OF POTENTIAL PENALTY** portion but no later than ninety (90) days of achieving compliance with the **COMPLIANCE ORDER** portion. The Respondents must include a justification of the offer. **DO NOT** submit payment of the offer amount with the form. The Department will review the settlement offer and notify the Respondents as to whether the offer is or is not accepted.

V.

This **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is effective upon receipt.

Baton Rouge, Louisiana, this 27th day of June, 2023.



Celena J. Cage
Assistant Secretary
Office of Environmental Compliance

Copies of a request for a hearing and/or related correspondence should be sent to:

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
P.O. Box 4312
Baton Rouge, LA 70821-4312
Attention: Bailey Macmurdo

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE
ENFORCEMENT DIVISION
POST OFFICE BOX 4312
BATON ROUGE, LOUISIANA 70821-4312

CONSOLIDATED COMPLIANCE ORDER &
NOTICE OF POTENTIAL PENALTY
REQUEST TO CLOSE



Enforcement Tracking No.	AE-CN-22-00367	Contact Name	James "Bailey" Macmurdo
Agency Interest (AI) No.	194203	Contact Phone No.	(225) 219-2141
Alternate ID No.	0560-00987		
Respondents:	Venture Global Calcasieu Pass, LLC and TransCameron Pipeline, LLC	Facility Name:	Calcasieu Pass LNG Project
	c/o C T Corporation System	Physical Location:	671 Davis Road
	Agent for Service of Process		
	3867 Plaza Tower Drive	City, State, Zip:	Cameron, LA 70631
	Baton Rouge, LA 70816	Parish:	Calcasieu

STATEMENT OF COMPLIANCE

STATEMENT OF COMPLIANCE	Date Completed	Copy Attached?
A written report was submitted in accordance with Paragraph VII of the "Order" portion of the COMPLIANCE ORDER.		
All necessary documents were submitted to the Department within 30 days of receipt of the COMPLIANCE ORDER in accordance with Paragraphs II, III, IV, V, and VI of the "Order" portion of the COMPLIANCE ORDER.		
All items in the "Findings of Fact" portion of the COMPLIANCE ORDER were addressed and the facility is being operated to meet and maintain the requirements of the "Order" portion of the COMPLIANCE ORDER. Final compliance was achieved as of:		

SETTLEMENT OFFER (OPTIONAL)

(check the applicable option)

_____	The Respondents are not interested in entering into settlement negotiations with the Department with the understanding that the Department has the right to assess civil penalties based on LAC 33:I.Subpart1.Chapter7.
_____	In order to resolve any claim for civil penalties for the violations in CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY (AE-CN-22-00367), the Respondents are interested in entering into settlement negotiations with the Department and would like to set up a meeting to discuss settlement procedures.
_____	<p>In order to resolve any claim for civil penalties for the violations in CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY (AE-CN-22-00367), the Respondents are interested in entering into settlement negotiations with the Department and offers to pay \$_____ which shall include LDEQ enforcement costs and any monetary benefit of non-compliance. The Respondents may submit the settlement offer within one hundred and eighty (180) days of receipt of this NOTICE OF POTENTIAL PENALTY portion but no later than ninety (90) days of achieving compliance with the COMPLIANCE ORDER portion.</p> <ul style="list-style-type: none"> • Monetary component = \$_____ • Beneficial Environmental Project (BEP) component (optional)= \$_____ • DO NOT SUBMIT PAYMENT OF THE OFFER WITH THIS FORM- the Department will review the settlement offer and notify the Respondents as to whether the offer is or is not accepted.
	The Respondents have reviewed the violations noted in CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY (AE-CN-22-00367) and has attached a justification of its offer and a description of any BEPs if included in settlement offer.

CERTIFICATION STATEMENT

I certify, under provisions in Louisiana and United States law that provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information attached and the compliance statement above, are true, accurate, and complete. I also certify that I do not owe outstanding fees or penalties to the Department for this facility or any other facility I own or operate. I further certify that I am either the Respondents or an authorized representative of the Respondents.

Respondents' Signature	Respondents' Printed Name	Respondents' Title
Respondents' Physical Address	Respondents' Phone #	Date

MAIL COMPLETED DOCUMENT TO THE ADDRESS BELOW:

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
P.O. Box 4312
Baton Rouge, LA 70821
Attn: Bailey Macmurdo

Attachment

2022 Exceedances of HAPs and TAPs
(as referenced in Findings of Fact paragraph IV)

Venture Global Calcasieu Pass, LLC and TransCameron Pipeline, LLC
 Calcasieu Pass LNG Project
 2022 First and Second Half Title V Semiannual Monitoring Report HAPs/TAPs Emissions Summary

Source ID	Pollutant	Deviation Began Date	Deviation Began Time	Deviation Ended Date	Deviation Ended Time	Total No. of Hours	Permit Limit (max lbs./hr.)	Estimated Emissions, lb/hr
EQT0006	Formaldehyde	4/15/22	2:00 PM	5/1/22	3:00 AM	58 (intermittently)	0.003	Estimated Formaldehyde max. pounds per hour: 0.008 lb/hr - 0.01 lb/hr
	n-hexane						0.06	Estimated n-hexane max. pounds per hour: 0.22 lb/hr - 0.24 lb/hr
EQT0006	Formaldehyde	8/31/22	8:00 PM	11/22/22	10:00 AM	7 (intermittently)	0.003	Estimated Formaldehyde max. pounds per hour: 0.009 lb/hr - 0.01 lb/hr
	n-hexane						0.06	Estimated n-hexane max. pounds per hour: 0.22 lb/hr - 0.24 lb/hr
EQT0007	Formaldehyde	4/16/22	8:00 PM	4/28/22	11:00 AM	81 (intermittently)	0.003	Estimated Formaldehyde max. pounds per hour: 0.009 lb/hr - 0.01 lb/hr
	n-hexane						0.06	Estimated n-hexane max. pounds per hour: 0.22 lb/hr - 0.24 lb/hr
EQT0007	Formaldehyde	9/1/22	7:00 AM	9/1/22	8:00 AM	1	0.003	Estimated Formaldehyde max. pounds per hour: 0.009 lb/hr
	n-hexane						0.06	Estimated n-hexane max. pounds per hour: 0.23 lb/hr
EQT0008	Formaldehyde	1/22/22	6:00 PM	6/14/22	6:00 AM	202 (intermittently)	0.003	Estimated Formaldehyde max. pounds per hour: 0.009 lb/hr - 0.01 lb/hr
	n-hexane						0.06	Estimated n-hexane max. pounds per hour: 0.22 lb/hr - 0.31 lb/hr
EQT0008	Formaldehyde	9/7/22	8:00 AM	12/16/22	6:00 PM	32 (intermittently)	0.003	Estimated Formaldehyde max. pounds per hour: 0.009 lb/hr - 0.01 lb/hr
	n-hexane						0.06	Estimated n-hexane max. pounds per hour: 0.22 lb/hr - 0.27 lb/hr
EQT0009	Formaldehyde	3/19/22	9:00 PM	5/1/22	4:00 AM	203 (intermittently)	0.003	Estimated Formaldehyde max. pounds per hour: 0.009 lb/hr - 0.01 lb/hr
	n-hexane						0.06	Estimated n-hexane max. pounds per hour: 0.22 lb/hr - 0.31 lb/hr
EQT0009	Formaldehyde	9/5/22	9:00 AM	9/7/22	11:00 AM	38 (intermittently)	0.003	Estimated Formaldehyde max. pounds per hour: 0.009 lb/hr - 0.01 lb/hr
	n-hexane						0.06	Estimated n-hexane max. pounds per hour: 0.22 lb/hr - 0.26 lb/hr
EQT0034	Acetaldehyde	3/3/22	1:00 PM	5/26/22	9:00 AM	82 (intermittently)	0.04	Estimated Acetaldehyde max. pounds per hour: 0.05 lb/hr
	Acrolein	3/3/22	1:00 PM	5/26/22	9:00 AM	82 (intermittently)	0.006	Estimated Acrolein max. pounds per hour: 0.007 - 0.008 lb/hr
	Benzene	3/23/22	11:00 AM	4/1/22	10:00 AM	4 (intermittently)	0.01	Estimated Benzene max. pounds per hour: 0.02 lb/hr
	Ethyl benzene	3/3/22	1:00 PM	5/26/22	9:00 AM	82 (intermittently)	0.03	Estimated Ethyl benzene max. pounds per hour: 0.04 lb/hr
	Formaldehyde	3/3/22	1:00 PM	5/26/22	8:00 AM	48 (intermittently)	0.23	Estimated Formaldehyde max. pounds per hour: 0.24 lb/hr - 0.26 lb/hr
	Naphthalene	3/3/22	1:00 PM	5/26/22	9:00 AM	82 (intermittently)	0.001	Estimated Naphthalene max. pounds per hour: 0.002 lb/hr
	Polynuclear Aromatic	3/3/22	1:00 PM	5/26/22	9:00 AM	82 (intermittently)	0.002	Estimated PAH max. pounds per hour: 0.003 lb/hr
	Propylene Oxide	3/3/22	1:00 PM	5/26/22	8:00 AM	18 (intermittently)	0.03	Estimated Propylene Oxide max. pounds per hour: 0.04 lb/hr
	Toluene	3/3/22	1:00 PM	5/26/22	9:00 AM	82 (intermittently)	0.12	Estimated Toluene max. pounds per hour: 0.15 lb/hr - 0.17 lb/hr
	Xylenes (mixed isomers)	3/3/22	1:00 PM	5/26/22	9:00 AM	82 (intermittently)	0.06	Estimated Xylenes (mixed isomers) max. pounds per hour: 0.07 lb/hr - 0.08 lb/hr

Venture Global Calcasieu Pass, LLC and TransCameron Pipeline, LLC
 Calcasieu Pass LNG Project
 2022 First and Second Half Title V Semiannual Monitoring Report ... HAPs/TAPs Emissions Summary

Source ID	Pollutant	Deviation Began		Deviation Ended		Total No. of Hours	Permit Limit (max lbs./hr.)	Estimated Emissions, lb/hr
		Date	Time	Date	Time			
EQT0035	Acetaldehyde	3/26/22	10:00 AM	5/26/22	9:00 AM	21 (intermittently)	0.04	Estimated Acetaldehyde max. pounds per hour: 0.05 lb/hr
	Acrolein	3/26/22	10:00 AM	5/26/22	9:00 AM	21 (intermittently)	0.006	Estimated Acrolein max. pounds per hour: 0.007 - 0.008 lb/hr
	Ethyl benzene	3/26/22	10:00 AM	5/26/22	9:00 AM	21 (intermittently)	0.03	Estimated Ethyl benzene max. pounds per hour: 0.04 lb/hr
	Formaldehyde	3/26/22	10:00 AM	5/26/22	8:00 AM	7 (intermittently)	0.23	Estimated Formaldehyde max. pounds per hour: 0.24 lb/hr - 0.25 lb/hr
	Naphthalene	3/26/22	10:00 AM	5/26/22	9:00 AM	21 (intermittently)	0.001	Estimated Naphthalene max. pounds per hour: 0.002 lb/hr
	Polynuclear Aromatic	3/26/22	10:00 AM	5/26/22	9:00 AM	21 (intermittently)	0.002	Estimated Polynuclear Aromatic Hydrocarbons max. pounds per hour: 0.003 lb/hr
	Propylene Oxide	3/26/22	10:00 AM	5/26/22	9:00 AM	2 (intermittently)	0.03	Estimated Propylene Oxide max. pounds per hour: 0.04 lb/hr
	Toluene	3/26/22	10:00 AM	5/26/22	9:00 AM	21 (intermittently)	0.12	Estimated Toluene max. pounds per hour: 0.15 lb/hr - 0.16 lb/hr
	Xylenes (mixed isomers)	3/26/22	10:00 AM	5/26/22	9:00 AM	21 (intermittently)	0.06	Estimated Xylenes (mixed isomers) max. pounds per hour: 0.07 lb/hr - 0.08 lb/hr
EQT0036	Acetaldehyde	3/24/22	9:00 AM	5/7/22	10:00 AM	100 (intermittently)	0.04	Estimated Acetaldehyde max. pounds per hour: 0.05 lb/hr
	Acrolein	3/24/22	9:00 AM	5/7/22	10:00 AM	100 (intermittently)	0.006	Estimated Acrolein max. pounds per hour: 0.007 - 0.008 lb/hr
	Benzene	3/24/22	11:00 AM	4/29/22	9:00 AM	15 (intermittently)	0.01	Estimated Benzene max. pounds per hour: 0.02 lb/hr
	Ethyl benzene	3/24/22	9:00 AM	5/7/22	10:00 AM	100 (intermittently)	0.03	Estimated Ethyl benzene max. pounds per hour: 0.04 lb/hr
	Formaldehyde	3/24/22	9:00 AM	5/7/22	10:00 AM	74 (intermittently)	0.23	Estimated Formaldehyde max. pounds per hour: 0.24 lb/hr - 0.26 lb/hr
	Naphthalene	3/24/22	9:00 AM	5/7/22	10:00 AM	100 (intermittently)	0.001	Estimated Naphthalene max. pounds per hour: 0.002 lb/hr
	Polynuclear Aromatic	3/24/22	9:00 AM	5/7/22	10:00 AM	100 (intermittently)	0.002	Estimated Polynuclear Aromatic Hydrocarbons max. pounds per hour: 0.003 lb/hr
	Propylene Oxide	3/24/22	9:00 AM	5/7/22	10:00 AM	52 (intermittently)	0.03	Estimated Propylene Oxide max. pounds per hour: 0.04 lb/hr
	Toluene	3/24/22	9:00 AM	5/7/22	10:00 AM	100 (intermittently)	0.12	Estimated Toluene max. pounds per hour: 0.15 lb/hr - 0.17 lb/hr
	Xylenes (mixed isomers)	3/24/22	9:00 AM	5/7/22	10:00 AM	100 (intermittently)	0.06	Estimated Xylenes (mixed isomers) max. pounds per hour: 0.07 lb/hr - 0.08 lb/hr

Venture Global Calcasieu Pass, LLC and TransCameron Pipeline, LLC
 Calcasieu Pass LNG Project
 2022 First and Second Half Title V Semiannual Monitoring Report – HAPs/TAPs Emissions Summary

Source ID	Pollutant	Deviation Began		Deviation Ended		Total No. of Hours	Permit Limit (max lbs./hr.)	Estimated Emissions, lb/hr
		Date	Time	Date	Time			
EQT0036	Acetaldehyde	7/20/22	1:00 PM	7/20/22	8:00 PM	4 (intermittently)	0.04	Estimated Acetaldehyde max. pounds per hour: 0.05 lb/hr
	Acrolein	7/20/22	1:00 PM	7/20/22	8:00 PM	4 (intermittently)	0.006	Estimated Acrolein max. pounds per hour: 0.008 lb/hr
	Benzene	7/20/22	2:00 PM	7/20/22	4:00 PM	2	0.01	Estimated Benzene max. pounds per hour: 0.02 lb/hr
	Ethyl benzene	7/20/22	1:00 PM	7/20/22	8:00 PM	4 (intermittently)	0.03	Estimated Ethyl benzene max. pounds per hour: 0.04 lb/hr
	Formaldehyde	7/20/22	2:00 PM	7/20/22	8:00 PM	3 (intermittently)	0.23	Estimated Formaldehyde max. pounds per hour: 0.24 lb/hr - 0.25 lb/hr
	Naphthalene	7/20/22	1:00 PM	7/20/22	8:00 PM	4 (intermittently)	0.001	Estimated Naphthalene max. pounds per hour: 0.002 lb/hr
	Polynuclear Aromatic	7/20/22	1:00 PM	7/20/22	8:00 PM	4 (intermittently)	0.002	Estimated Polynuclear Aromatic Hydrocarbons max. pounds per hour: 0.003 lb/hr
	Propylene Oxide	7/20/22	2:00 PM	7/20/22	4:00 PM	2	0.03	Estimated Propylene Oxide max. pounds per hour: 0.04 lb/hr
	Toluene	7/20/22	1:00 PM	7/20/22	8:00 PM	4 (intermittently)	0.12	Estimated Toluene max. pounds per hour: 0.15 lb/hr - 0.17 lb/hr
	Xylenes (mixed isomers)	7/20/22	1:00 PM	7/20/22	8:00 PM	4 (intermittently)	0.06	Estimated Xylenes (mixed isomers) max. pounds per hour: 0.08 lb/hr

SETTLEMENT AGREEMENTS

WHAT IS A SETTLEMENT AGREEMENT?

Once the Department has determined that a penalty is warranted for a violation, the Assistant Secretary of the Department, with the concurrence of the Attorney General, may enter into a settlement agreement with the Respondent as a means to resolve the Department's claim for a penalty.

HOW DOES THE SETTLEMENT AGREEMENT PROCESS WORK?

To begin the settlement agreement process, the Department must receive a written settlement offer. Once this offer is submitted, it is sent for approval by the Assistant Secretary of the Office of Environmental Compliance. The formal Settlement Agreement is drafted and sent to the Attorney General's office where the Attorney General has a 90 day concurrence period. During this time, the Respondent is required to run a public notice in an official journal and/or newspaper of general circulation in each affected parish. After which, a 45 day public comment period is opened to allow the public to submit comments. Once the Department has received concurrence, the settlement agreement is signed by both parties. The Department then forwards a letter to the responsible party to establish a payment plan and/or beneficial environmental project (BEP).

WHAT SHOULD I INCLUDE IN A SETTLEMENT AGREEMENT?

The Department uses the penalty determination method defined in LAC 33:1.705 as a guideline to accepting settlement offers. The penalty matrix is used to determine a penalty range for each violation based on the two violation specific factors, the nature and gravity of the violation and the degree of risk/impact to human health and property.

		NATURE AND GRAVITY OF THE VIOLATION		
		MAJOR	MODERATE	MINOR
DEGREE OF RISK OR IMPACT TO HUMAN HEALTH OR PROPERTY	MAJOR	\$32,500 to \$20,000	\$20,000 to \$15,000	\$15,000 to \$11,000
	MODERATE	\$11,000 to \$8,000	\$8,000 to \$5,000	\$5,000 to \$3,000
	MINOR	\$3,000 to \$1,500	\$1,500 to \$500	\$500 to \$100

Degree of Risk to Human Health or Property

Major: (actual measurable harm or substantial risk of harm) A violation of major impact to an environmental resource or a hazard characterized by high volume and/or frequent occurrence and/or high pollutant concentration.

Moderate: (potential for measurable detrimental impact) A violation of moderate impact and hazard may be one characterized by occasional occurrence and/or pollutant concentration that may be expected to have a detrimental effect under certain conditions

Minor: (no harm or risk of harm) A violation of minor impact are isolated single incidences and that cause no measurable detrimental effect or are administrative in nature.

Nature and Gravity of the Violation

Major: Violations of statutes, regulations, orders, permit limits, or permit requirements that result in negating the intent of the requirement to such an extent that little or no implementation of requirements occurred.

Moderate: Violations that result in substantially negating the intent of the requirements, but some implementation of the requirements occurred.

Minor: Violations that result in some deviation from the intent of the requirement; however, substantial implementation is demonstrated.

The range is adjusted using the following violator specific factors:

1. history of previous violations or repeated noncompliance;
2. gross revenues generated by the respondent;
3. degree of culpability, recalcitrance, defiance, or indifference to regulations or orders;
4. whether the Respondent has failed to mitigate or to make a reasonable attempt to mitigate the damages caused by the violation; and
5. whether the violation and the surrounding circumstances were immediately reported to the department, and whether the violation was concealed or there was an attempt to conceal by the Respondent.



SETTLEMENT AGREEMENTS

Given the previous information, the following formula is used to obtain a penalty amount.

$$\text{Penalty Event Total} = \text{Penalty Event Minimum} + (\text{Adjustment Percentage} \times [\text{Penalty Event Maximum} - \text{Penalty Event Minimum}])$$

After this, the Department adds any monetary benefit of noncompliance to the penalty event. In the event that a monetary benefit is gained due to the delay of a cost that is ultimately paid, the Department adds the applicable judicial interest. Finally, the Department adds all response costs including, but not limited to, the cost of conducting inspections, and the staff time devoted to the preparation of reports and issuing enforcement actions.

WHAT IS A BEP?

A BEP is a project that provides for environmental mitigation which the respondent is not otherwise legally required to perform, but which the defendant/respondent agrees to undertake as a component of the settlement agreement.

Project categories for BEPs include public health, pollution prevention, pollution reduction, environmental restoration and protection, assessments and audits, environmental compliance promotion, and emergency planning, preparedness and response. Other projects may be considered if the Department determines that these projects have environmental merit and is otherwise fully consistent with the intent of the BEP regulations.

WHAT HAPPENS IF MY OFFER IS REJECTED?

If an offer is rejected by the Assistant Secretary, the Legal Division will contact the responsible party, or anyone designated as an appropriate contact in the settlement offer, to discuss any discrepancies.

WHERE CAN I FIND EXAMPLES AND MORE INFORMATION?

Settlement Offers	searchable in EDMS using the following filters Media: Air Quality, Function: Enforcement: Description: Settlement
Settlement Agreements	Enforcement Division's website specific examples can be provided upon request
Penalty Determination Method	LAC 68:11 Chapter 7
Beneficial Environmental Projects	LAC 68:11 Chapter 25 FAQs
Judicial Interest.....	provided by the Louisiana State Bar Association



JEFF LANDRY
GOVERNOR



COURTNEY J. BURDETTE
SECRETARY

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

MAY 09 2025



CERTIFIED MAIL (7019 2970 0000 6037 2858)
RETURN RECEIPT REQUESTED

VENTURE GLOBAL CALCASIEU PASS, LLC and TRANSCAMERON PIPELINE, LLC
c/o C T Corporation System
Agent for Service of Process
3867 Plaza Tower Dr.
Baton Rouge, LA 70816

**RE: AMENDED CONSOLIDATED COMPLIANCE ORDER &
NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. AE-CN-22-00367A
AGENCY INTEREST NO. 194203**

Dear Sir/Madam:

Pursuant to the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is hereby served on **VENTURE GLOBAL CALCASIEU PASS, LLC and TRANSCAMERON PIPELINE, LLC (RESPONDENTS)** for the violations described therein.

Any questions concerning this action should be directed to James "Bailey" Macmurdo at (225) 219-2141 or Bailey.Macmurdo@la.gov.

Sincerely,

A handwritten signature in cursive script that reads "Angela Marse".

Angela Marse
Administrator
Enforcement Division

AM/JBM/jbm
Alt ID No. LA0000002202300987
Attachment

c: **VENTURE GLOBAL CALCASIEU PASS, LLC and
TRANSCAMERON PIPELINE, LLC**

c/o Andy Vaughan, Vice President Operations
516 Davis Road
Cameron, LA 70631

**VENTURE GLOBAL CALCASIEU PASS, LLC and
TRANSCAMERON PIPELINE, LLC**

c/o Rahul Pendse, P.E., Vice President, Air Quality Compliance and Optimization
1401 McKinney Street, Suite 2600
Houston, TX 77010

KEAN MILLER LLP

c/o Lauren J. Rucinski, Partner, Counsel for Respondents
P. O. Box 3513
Baton Rouge, LA 70821-3513
(via Certified Mail No. 9589 0710 5270 1460 8074 34)

**STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE**

IN THE MATTER OF

VENTURE GLOBAL CALCASIEU PASS, LLC *	ENFORCEMENT TRACKING NO.
and TRANSCAMERON PIPELINE, LLC *	
CAMERON PARISH *	AE-CN-22-00367A
ALT ID NO. LA0000002202300987 *	

PROCEEDINGS UNDER THE LOUISIANA * 194203
ENVIRONMENTAL QUALITY ACT, *
La. R.S. 30:2001, ET SEQ. *

**AMENDED CONSOLIDATED COMPLIANCE ORDER &
NOTICE OF POTENTIAL PENALTY**

The Louisiana Department of Environmental Quality (the Department) hereby amends the **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. AE-CN-22-00367** issued to **VENTURE GLOBAL CALCASIEU PASS, LLC and TRANSCAMERON PIPELINE, LLC (RESPONDENTS)** on June 29, 2023, in the above-captioned matter as follows:

I.

The Department hereby amends Findings of Fact Paragraphs I and IV.118, 121, 122, 133, and 139 of **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. AE-CN-22-00367**, to read as follows:

“I.

The Respondents own and/or operate **CALCASIEU PASS LNG PROJECT (FACILITY)**, a liquefied natural gas (LNG) production, storage, and export terminal, located at 671 Davis Road in Cameron, Cameron Parish, Louisiana. The facility operates or has operated under the following Title V and Prevention of Significant Deterioration (PSD) Air Permits:

Air Permit Number	Date Issued	Expiration Date
PSD-LA-805 (M-5)	3/10/2025	---
0560-00987-V5	3/10/2025	3/10/2030
PSD-LA-805 (M-4)	7/1/2021	---

Air Permit Number	Date Issued	Expiration Date
0560-00987-V4	7/1/2021	9/21/2023
PSD-LA-805 (M-3)	2/2/2021	---
0560-00987-V3	2/2/2021	9/21/2023
PSD-LA-805 (M-2)	2/5/2020	---
0560-00987-V2	2/5/2020	9/21/2023
0560-00987-V1	8/26/2019	9/21/2023
PSD-LA-805 (M-1)	8/26/2019	---
0560-00987-V0	9/21/2018	9/21/2023
PSD-LA-805	9/21/2018	---

IV.

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
118.	2022 Title V 2 nd Semi-Annual Monitoring Report (3/30/2023)	0560-00987-V4	Simple Cycle Combustion Turbine 2 (EQT 0035)	7/19/2022 (3 hrs.)	NOx (42.00 lbs./hr.)	43.9; 72.75; 78.25	While starting up EQT 0004, the entire plant tripped, resulting in the flame going out of EQT 0035.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted to return EQT 0035 to compliance.
121.	2022 Title V 2 nd Semi-Annual Monitoring Report (3/30/2023)	0560-00987-V4	EQT 0036	7/20/2022 (4 hrs.)	VOC (2.00 lbs./hr. 3-hr average during normal operation)	2.13	Based on further review of fuel flow rates and high heating values, the VOC emissions exceeded the permit limit.	Per the letter dated October 4, 2022, EQT 0036 no longer operates in simple cycle mode.
122.		0560-00987-V4		7/20/2022 (1 hr.)	VOC * (2.00 lbs./hr.)	2.02-2.22		
133.	2022 Title V 2 nd Semi-Annual Monitoring Report (3/30/2023)	0560-00987-V4	EQT 0036	8/28/2022 (2 hrs.)	NOx (42.00 lbs./hr.)	63.70; 67.67	A process upset occurred due to equipment tripping, resulting in EQT 0036 dropping into extended, lean-lean operating mode.	Before the facility's EMS was commissioned, turbine loads had to be manually adjusted to return EQT 0036 to compliance.

	Report (Date)	Permit Number	Emission Source	Incident Date(s) (Duration)	Pollutant(s) Released (Permit Limit)	Quantity Reported (lbs./hr.)	Reported Cause	Corrective Action
139.	2022 Title V 2 nd Semi- Annual Monitoring Report (3/30/2023)	PSD-LA- 805 (M-4)	EQT 0051	12/23/2022– 12/27/2022 (28 hrs.)	NOx (15.4 lbs./hr. 2-hour average during cold start)	15.8–20.1 (2-hr. average)	During freeze event, there was a facility blackout and black start event; EQT 0051 tripped multiple times and experienced instrumentation issues.	Operators restored EQT 0051 to MECL after freeze event.

II.

The Department hereby adds Paragraphs VII.A – I to the Findings of Fact portion of **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. AE-CN-22-00367** as follows:

--VII.

On or about December 4 – 5, 2024, and January 14, 2025, the Department conducted an inspection at the facility, and on or about April 1, 2025, the Department conducted a file review of the facility to determine the Respondents' degree of compliance with the Act and the Air Quality Regulations. While the investigation is not yet complete, the following violations were noted during the course of the inspection and file review:

- A. The Respondents failed to submit reports of excess emissions and monitor downtime, in accordance with 40 CFR 60.7(c). Specifically, pursuant to Specific Requirement (SR) 7 of Title V Air Permit Nos. 0560-00987-V0, 0560-00987-V1, 0560-00987-V2, 0560-00987-V3, and 0560-00987-V4, the Respondents installed a continuous emission monitor (CEM) on the combustion turbines in Common Requirements Group 1 (CRG 0001), and were required by SR 13, 40 CFR 60.4375(a), and 40 CFR 60.7(c) to submit semi-annual excess emission reports and monitor downtime beginning September 21, 2018; however, the Respondents have not submitted an excess emission and monitor downtime report for the turbines in CRG 0001 as of April 1, 2025. Each failure to submit reports of excess emissions and monitor downtime, in accordance with 40 CFR 60.7(c) is a violation of 40 CFR 60.4375(a), which language has been incorporated by reference in LAC 33:III.3003.A, SRs 13 and 129 of Title V Air Permit No. 0560-00987-V0, SRs

13 and 102 of Title V Air Permit No. 0560-00987-V1, SRs 13 and 107 of Title V Air Permit No. 0560-00987-V2, SRs 13 and 105 of Title V Air Permit No. 0560-00987-V3, SRs 13 and 105 of Title V Air Permit No. 0560-00987-V4, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). On or about March 10, 2025, the Department issued Title V Air Permit No. 0560-00987-V5 to the Respondents, which does not include this requirement.

- B. The Respondents failed to submit prompt reports of all permit deviations to the Office of Environmental Compliance. Specifically, on or about February 12, 2023, the Department received a citizen's complaint alleging excessive flaring and visible emissions from the marine flare at the facility. On February 13, 2023, a representative of the Respondents provided Method 9 opacity observations for the "Jetty Flare", and the Department determined, from the Respondents' February 12, 2023, Method 9 observations from 4:35 PM to 5:05 PM, that opacity was above twenty (20) percent for two (2) six (6) minute periods (observation nos. 1 – 24 and 61 – 84). The two (2) six (6) minute periods had an average opacity of 21.458 percent and 21.042 percent, respectively. The Respondents were required by SR 59 of Title V Air Permit No. 0560-00987-V4 to operate the flares at the facility with opacity less than or equal to twenty (20) percent, except for emissions that have an average opacity in excess of twenty (20) percent for not more than one (1) six (6) minute period in any consecutive sixty (60) minutes. The opacity observed on February 12, 2023, constitutes a deviation from the Respondents' permit, and was required to be reported to the Office of Environmental Compliance in the 2023 Title V 1st Semi-Annual Monitoring Report; however, as of April 1, 2025, the Respondents have not reported this permit deviation in a semiannual report. The failure to submit prompt reports of all permit deviations to the Office of Environmental Compliance is a violation of LAC 33:III.535.General Condition R, SR 120 of Title V Air Permit No. 0560-00987-V4, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- C. The Respondents failed to control the emission of particulate matter so that the shade or appearance of the emission is not denser than twenty (20) percent average opacity; except the emissions may have an average opacity in excess of twenty (20) percent for not more than one (1) six (6) minute period in any sixty (60) consecutive minutes. Specifically, as referenced in Findings of Fact VII.B, the Respondents observed average opacity in excess of twenty (20) percent for two (2) six (6)

minute periods on February 12, 2023, from 4:35 PM to 5:05 PM. The failure to control the emissions of particulate matter so that the shade or appearance of the emission is not denser than twenty (20) percent average opacity; except the emissions may have an average opacity in excess of twenty (20) percent for not more than one (1) six (6) minute period in any sixty (60) consecutive minutes is a violation of LAC 33:III.1311.C, SRs 59 and 105 of Title V Air Permit No. 0560-00987-V4, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and La. R.S. 30:2057(A)(2).

D. The Respondents failed to operate with no visible emissions except for periods not to exceed a total of five (5) minutes during any two (2) consecutive hours. Specifically, as referenced in Findings of Fact VII.B, the Respondents operated its flare with visible emissions for two (2) six (6) minute periods on February 12, 2023, from 4:35 PM to 5:05 PM. Each failure to operate with no visible emissions except for periods not to exceed a total of five (5) minutes during any two (2) consecutive hours is a violation of 40 CFR 60.18(c), which language has been incorporated by reference in LAC 33:III.3003.A, SRs 52 and 105 of Title V Air Permit No. 0560-00987-V4, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and La. R.S. 30:2057(A)(2).

E. The Respondents failed to comply with the best available control technology (BACT). Specifically, there were two (2) occurrences of this violation:

1. The Respondents reported in the Revised 2023 Title V 1st Semi-Annual Monitoring Report dated October 4, 2023, that acid gas was combusted in the Acid Gas Thermal Oxidizer 1 (EQT 0012) for two (2) hours on April 6, 2023, while the fire box temperature was lower than the manufacturer's recommendation.
2. The Respondents reported in the Revised 2023 Title V 1st Semi-Annual Monitoring Report dated October 4, 2023, that acid gas was combusted in the Acid Gas Thermal Oxidizer 2 (EQT 0030) while the fire box temperature was lower than the manufacturer's recommendation for five (5) hours intermittently, from March 8 to May 25, 2023.

BACT for the thermal oxidizer includes, but is not limited to, combusting exclusively gaseous fuels, maintaining a proper air-to-fuel ratio, temperature, oxygen level, residence time, proper

equipment design, proper operation, and implementing and ensuring good combustion practices on the thermal oxidizer. Each failure to comply with BACT for the two (2) thermal oxidizers is a violation of Specific Condition 3 of Prevention of Significant Deterioration (PSD) Permit No. PSD-LA-805 (M-4), SRs 93, 105, and 111 of Title V Air Permit No. 0560-00987-V4, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and La. R.S. 30:2057(A)(2). The Respondents reported that, as a corrective action, the supplemental fuel flow rates were increased to return the thermal oxidizers to compliance, and the control logic was updated with alarms to prevent future occurrence of similar violations.

F. The Respondents reported the following violations of operating parameters:

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Operating Parameter	Cause	Corrective Action	Regulatory or Permit Requirement(s)
1.	2023 Title V 1st Semi- Annual Monitoring Report (10/4/2023)	EQT 0013 (0560- 00987-V4)	3/30/2023 9:00 PM - 3/31/2023 2:00 AM (5 hrs.)	Net Heating Value >= 300 BTU/scf	An operational upset resulted in the net heating value of the Warm Flare to fall below 300 BTU/scf.	The operation condition was returned to compliance by increasing the supplemental fuel flow rates, and alarms were added into the control logic for the Warm Flare to minimize the potential of a future occurrence.	40 CFR 60.18(c)(3)(ii); SRs 54 and 105
2.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0014 (0560- 00987-V4)	8/1/2023 10:00 AM - 9/22/2023 3:00 AM (6 hrs. intermittently)	Net Heating Value >= 300 BTU/scf	The Respondents reported, as a result of nitrogen purging and defrosting of the Liquefaction Train System (LTS), the net heating value of the Cold Flare was less than 300 BTU/scf, intermittently for 6 hours from 10:00 am on August 1, 2023 to 3:00 am on September 22, 2023, as determined by the facility's BTU monitoring system.	The operation conditions were quickly returned to compliance by increasing the supplemental fuel flow rates.	40 CFR 60.18(c)(3)(ii); SRs 54 and 105

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Operating Parameter	Cause	Corrective Action	Regulatory or Permit Requirement(s)
3.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0015 (SCN 0015) (0560- 00987-V4)	12/17/2023 5:15 PM - 12/17/2023 5:45 PM (0.5 hrs.)	Opacity <= 20 %	The Respondents reported during gasup/cooldown operations, due to the composition of the ship's vapor return, the LP Vent Flare (EQT 0015, SCN 0015) did not meet the opacity standard (<= 20 percent) from 5:15 pm to 5:45 pm on December 17, 2023.	The ship's vapor was routed from the LP Vent Flare to the fuel gas system when it was possible to do so to minimize the duration of the flaring event. The facility indicated it reviewed the gasup/cooldown procedures to reduce the potential for the composition of a ship's vapor return to cause the LP Vent Flare to not comply with the opacity standard.	LAC 33:III.1311.C; SRs 59 and 105

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Operating Parameter	Cause	Corrective Action	Regulatory or Permit Requirement(s)
4.	2024 Title V 1st Semi- Annual Monitoring Report (9/26/2024)	EQT 0015 (0560- 00987-V4)	4/19/2024 10:00 PM - 4/19/2024 11:00 PM (1 hr.)	Net Heating Value >= 200 BTU/scf	<p>The Respondents reported the net heating value of the gas being combusted in the Low Pressure (LP) Vent Flare was not maintained at or above the required minimum on April 19, 2024 during installation of a second, redundant uninterruptable power supply (UPS) to the control room. The Respondents reported temporary power was installed during the planned electrical panel outages to support critical loads while the new UPS was being connected. During this time, the circuit breaker in the temporary power panel providing power to the communication cabinet tripped, resulting in an unexpected shutdown of the entire liquefaction facility (i.e., Pretreatment Systems, Liquefaction Train Systems, and Storage, Loading, and Utilities). The Respondents reported as a result of this event, the purge gas (boil-off gas) required to prevent the ingress of oxygen into the flare was not available and, as per Respondents design, and as a critical safety measure, nitrogen was routed to the flare to maintain the purge rate. Thus, the Respondents were not able to maintain the minimum 200 BTU/scf heating value for of the flare gas.</p>	<p>The Respondents increased supplemental fuel flow rates. The temporary power panel was demobilized from the site after the new redundant UPS was commissioned in April 2024.</p>	<p>40 CFR 60.18(c)(3)(ii); SR 97</p>

Each failure to operate according to permitted operating parameters is a violation of the requirements listed above, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and La. R.S. 30:2057(A)(2).

G. The Respondents reported the following emissions exceedances:

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Pollutant (Permit Limit max lbs./hr.)	Total Amount in Excess of Limit (lbs.)	Reported Deviation	Corrective Action
1.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0004 and EQT 0005 (0560- 00987-V4)	3/26/2022 10:00 AM - 7/14/2022 10:00 PM (27 hrs. inter- mittently)	NOx (375.98)	1,913.98	The Respondents reported excess emissions during the commissioning period. The combined emissions from EQT 0004 and EQT 0005 over the course of eleven (11) days exceeded the CAP allowed by SR 106.	No corrective action reported. The Respondents stated that the commissioning period ended on December 16, 2022.
2.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0004 and EQT 0005 (0560- 00987-V4)	3/26/2022 10:00 AM - 7/14/2022 10:00 PM (27 hrs. inter- mittently)	SO2 (1.98)	0.24	The Respondents reported excess emissions during the commissioning period. The combined emissions from EQT 0004 and EQT 0005 over the course of eleven (11) days exceeded the CAP allowed by SR 106.	No corrective action reported. The Respondents stated that the commissioning period ended on December 16, 2022.
3.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0001 and EQT 0004 (0560- 00987-V4)	8/13/2022 04:00 AM - 8/13/2022 10:00 AM (6 hrs.)	NOx (375.98)	9.34	The Respondents reported excess emissions during the commissioning period. The combined emissions from EQT 0001 and EQT 0004 during the period exceeded the CAP allowed by SR 106.	No corrective action reported. The Respondents stated that the commissioning period ended on December 16, 2022.
4.	2023 Title V 1st Semi-Annual Monitoring Report (10/4/2023)	EQT 0005 (0560- 00987-V4)	3/2/2023 11:00 PM - 3/3/2023 06:00 AM (7 hrs.)	NOx (13.8)	771.61	After a facility-wide blackout beginning on March 2, 2023, Combined Cycle Combustion Turbine 5 (CCCT5) was brought online to restore operations. The subsequent restart resulted in CCCT5 (EQT 0005) operating below the minimum emissions compliance load (MECL) during startup beginning on March 2, 2023.	Once the liquefaction trains became available after the facility-wide blackout, operators started to supply the power to the liquefaction trains, and affected turbines were restored into pre-mix combustion mode.
5.	2023 Title V 1st Semi-Annual Monitoring Report (10/4/2023)	EQT 0003 (0560- 00987-V4)	3/3/2023 03:00 AM - 3/23/2023 05:00 AM (2 hrs.)	NOx (13.8)	91.60	After a facility-wide blackout, which occurred on March 3, 2023, Combined Cycle Combustion Turbine (CCCT3) was brought online to restore operations.	Once the liquefaction trains became available after the facility-wide blackout, operators started to supply the power to the liquefaction trains, and affected turbines were restored into pre-mix combustion mode.

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Pollutant (Permit Limit max lbs/hr.)	Total Amount in Excess of Limit (lbs.)	Reported Deviation	Corrective Action
6.	2023 Title V 1st Semi-Annual Monitoring Report (10/4/2023)	EQT 0004 (0560- 00987-V4)	3/3/2023 06:00 AM - 3/3/2023 08:00 AM (2 hrs.)	NOx (13.8)	57.40	After a facility-wide blackout, which occurred on March 3, 2023, CCCT3 was brought online to restore operations.	Once the liquefaction trains became available after the facility-wide blackout, operators started to supply the power to the liquefaction trains, and affected turbines were restored into premix combustion mode.
7.	2023 Title V 1st Semi-Annual Monitoring Report (10/4/2023)	EQT 0001 (0560- 00987-V4)	3/3/2023 07:00 PM - 3/3/2023 08:00 PM (1 hr.)	NOx (13.8)	0.71	Moisture buildup in a pressure sensor caused a faulty reading of gas turbine high exhaust duct pressure, which resulted in a trip of Combined Cycle Combustion Turbine 1 (CCCT1). The subsequent restart of CCCT1 resulted in the turbine operating below the MECL.	Operators ramped-up the CCCT1 above MECL and returned the turbine into emissions compliance. Modifications were made to the exhaust pressure tubing to prevent moisture buildup at the pressure sensor.
8.	2023 Title V 1st Semi-Annual Monitoring Report (10/4/2023)	EQT 0001 (0560- 00987-V4)	3/6/2023 06:00 AM - 3/6/2023 07:00 AM (1 hr.)	NOx (13.8)	35.03	A steam turbine tripped due to issues with a brush gear, which resulted in a load shedding event and Combined Cycle Combustion Turbines 1, 2, and 4 (CCCT1, CCCT2, and CCCT4) dropping into lean-lean combustion mode on March 6, 2023.	Operations personnel performed a high load transfer of each of the turbines, CCCT1, CCCT2, and CCCT4 and restored each turbine into premix combustion mode, and replaced the brushes.
9.	2023 Title V 1st Semi-Annual Monitoring Report (10/4/2023)	EQT 0002 (0560- 00987-V4)	3/6/2023 06:00 AM - 3/6/2023 07:00 AM (1 hr.)	NOx (13.8)	41.24	A steam turbine tripped due to issues with a brush gear, which resulted in a load shedding event and Combined Cycle Combustion Turbines 1, 2, and 4 (CCCT1, CCCT2, and CCCT4) dropping into lean-lean combustion mode on March 6, 2023.	Operations personnel performed a high load transfer of each of the turbines, CCCT1, CCCT2, and CCCT4 and restored each turbine into premix combustion mode, and replaced the brushes.
10.	2023 Title V 1st Semi-Annual Monitoring Report (10/4/2023)	EQT 0004 (0560- 00987-V4)	3/6/2023 06:00 AM - 3/6/2023 07:00 AM (1 hr.)	NOx (13.8)	45.19	A steam turbine tripped due to issues with a brush gear, which resulted in a load shedding event and Combined Cycle Combustion Turbines 1, 2, and 4 (CCCT1, CCCT2, and CCCT4) dropping into lean-lean combustion mode on March 6, 2023.	Operations personnel performed a high load transfer of each of the turbines, CCCT1, CCCT2, and CCCT4 and restored each turbine into premix combustion mode, and replaced the brushes.

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Pollutant (Permit Limit max lbs./hr.)	Total Amount in Excess of Limit (lbs.)	Reported Deviation	Corrective Action
11.	2023 Title V 1st Semi-Annual Monitoring Report (10/4/2023)	EQT 0005 (0560- 00987-V4)	3/6/2023 06:00 AM - 3/6/2023 07:00 AM (1 hr.)	NOx (13.8)	48.22	A steam turbine tripped which resulted in a load shedding event that caused CCCT5 to come out of premix combustion mode on March 6, 2023.	Operations personnel performed a high load transfer of the CCCT5 and restored the turbine into premix combustion mode.
12.	2023 Title V 1st Semi-Annual Monitoring Report (10/4/2023)	EQT 0004 (0560- 00987-V4)	3/25/2023 07:00 PM - 3/26/2023 12:00 AM (5 hrs.)	NOx (13.8)	628.98	A facility-wide blackout occurred on March 25, 2023, which was the result of a control logic issue which caused the loss of all the boiler feed water pumps and resulted in all five combined cycle turbines tripping. The facility reported Combined Cycle Combustion Turbine 4 (CCCT4) was brought online to restore operations, and the subsequent restart resulted in CCCT4 operating below the MECL on March 25, 2023 due to steam demand for multiple turbines and need for adequate load for supplying power to the liquefaction trains.	The operators restored EQT 0004 into premix combustion mode when load was available. The boiler feed water pump control logic was modified to prevent reoccurrence.
13.	2023 Title V 1st Semi-Annual Monitoring Report (10/4/2023)	EQT 0051 (0560- 00987-V4)	4/19/2023 01:00 PM - 4/19/2023 09:00 PM (8 hrs.)	NOx (2.65)	79.33	A facility-wide blackout occurred on April 19, 2023, when the Aeroderivative Simple Cycle Combustion Turbine (ASCCT1) was brought online to restore operations. The subsequent restart resulted in ASCCT1 operating below the MECL on April 19, 2023.	Once the liquefaction trains became available after the facility-wide blackout, operations personnel started to supply the power to the liquefaction trains, which restored ASCCT1 into premix combustion mode.
14.	2023 Title V 1st Semi-Annual Monitoring Report (10/4/2023)	EQT 0002 (0560- 00987-V4)	4/19/2023 08:00 PM - 4/19/2023 11:00 PM (3 hrs.)	CO (16.8)	0.08	After a facility-wide blackout on April 19, 2023, Combined Cycle Combustion Turbine 2 (CCCT2) was brought online to restore operations. The subsequent restart resulted in CCCT2 operating below the MECL during startup on April 19, 2023.	Once the liquefaction trains became available after the facility-wide blackout, operators started to supply the power to the liquefaction trains, and affected turbines were restored into premix combustion mode.

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Pollutant (Permit Limit max lbs./hr.)	Total Amount in Excess of Limit (lbs.)	Reported Deviation	Corrective Action
15.	2023 Title V 1st Semi-Annual Monitoring Report (10/4/2023)	EQT 0002 (0560- 00987-V4)	4/19/2023 08:00 PM - 4/19/2023 11:00 PM (3 hrs.)	NOx (13.8)	626.19	After a facility-wide blackout on April 19, 2023, CCCT2 was brought online to restore operations. The subsequent restart resulted in CCCT2 operating below the MECL during startup on April 19, 2023.	Once the liquefaction trains became available after the facility-wide blackout, operators started to supply the power to the liquefaction trains, and affected turbines were restored into premix combustion mode.
16.	2023 Title V 1st Semi-Annual Monitoring Report (10/4/2023)	EQT 0002 (0560- 00987-V4)	6/8/2023 03:00 PM - 6/8/2023 04:00 PM (1 hr.)	NOx (13.8)	40.17	A damaged cable in the Energy Management System sent an erroneous signal to CCCT2 causing a fast load shed and CCCT2 dropping out of premix combustion mode on June 8, 2023.	Operations personnel performed a high load transfer of CCCT2 and restored the turbine into premix combustion mode. The damaged cable was replaced.
17.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0051 (SCN 0013) (0560- 00987-V4)	7/22/2023 01:00 AM - 12/27/2023 11:00 AM (4 hrs. inter- mittently)	CO (10.78)	8.04	The Respondents reported excess emissions during cold starts.	The Respondents submitted a permit application to reconcile the maximum hourly emissions for SCN 0013 in Title V Air Permit No. 0560-00987-V4. On or about March 10, 2025, the Department issued Title V Air Permit No. 0560-00987-V5, which removed the SCN 0013 emission limits.
18.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0051 (PSD-LA- 805 (M-4))	7/22/2023 01:00 AM - 12/27/2023 11:00 AM (4 hrs. inter- mittently)	CO (9.04)	1.11	The Respondents reported excess emissions during cold starts.	The Respondents submitted a permit application to reconcile the cold start emission limits for EQT 0051 in PSD-LA-805 (M-4). On or about March 10, 2025, the Department issued PSD Permit No. PSD-LA-805 (M-4), which increased this emission limit.
19.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0051 (SCN 0013) (0560- 00987-V4)	7/22/2023 01:00 AM - 12/27/2023 11:00 AM (4 hrs. inter- mittently)	VOC (0.26)	0.08	The Respondents reported excess emissions during cold starts.	The Respondents submitted a permit application to reconcile the maximum hourly emissions for SCN 0013 in Title V Air Permit No. 0560-00987-V4. On or about March 10, 2025, the Department issued Title V Air Permit No. 0560-00987-V5, which removed the SCN 0013 emission limits.

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Pollutant (Permit Limit max lbs./hr.)	Total Amount in Excess of Limit (lbs.)	Reported Deviation	Corrective Action
20.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0051 (PSD-LA- 805 (M-4))	7/22/2023 01:00 AM - 12/27/2023 11:00 AM (4 hrs. inter- mittently)	VOC (0.22)	0.16	The Respondents reported excess emissions during cold starts.	The Respondents submitted a permit application to reconcile the cold start emission limits for EQT 0051 in PSD-LA-805 (M-4). On or about March 10, 2025, the Department issued PSD Permit No. PSD-LA-805 (M- 4), which increased the emissions limit.
21.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0051 (SCN 0013) (0560- 00987-V4)	7/22/2023 01:00 AM - 12/27/2023 11:00 AM (4 hrs. inter- mittently)	Formal- dehyde (0.10)	<i>*not specified *</i>	The Respondents reported excess emissions during cold starts.	The Respondents submitted a permit application to reconcile the maximum hourly emissions for SCN 0013 in Title V Air Permit No. 0560-00987-V4. On or about March 10, 2025, the Department issued Title V Air Permit No. 0560-00987- V5, which removed the SCN 0013 emission limits.
22.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0051 (PSD-LA- 805 (M-4))	7/22/2023 01:00 AM - 12/27/2023 11:00 AM (4 hrs. inter- mittently)	VOC (Formal- dehyde) (0.22)	<i>*not specified *</i>	The Respondents reported excess emissions during cold starts.	The Respondents submitted a permit application to reconcile the cold start emission limits for EQT 0051 in PSD-LA-805 (M-4). On or about March 10, 2025, the Department issued PSD Permit No. PSD-LA-805 (M- 4), which removed this limit.
23.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0051 (SCN 0013) (0560- 00987-V4)	7/25/2023 10:00 AM - 9/13/2023 02:00 PM (4 hrs. inter- mittently)	VOC (0.26)	0.11	The Respondents reported excess emissions during intermittent warm starts.	The Respondents submitted a permit application to reconcile the maximum hourly emissions for SCN 0013 in Title V Air Permit No. 0560-00987-V4. On or about March 10, 2025, the Department issued Title V Air Permit No. 0560-00987- V5, which removed the SCN 0013 emission limits.
24.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0051 (PSD-LA- 805 (M-4))	7/25/2023 10:00 AM - 9/13/2023 02:00 PM (4 hrs. inter- mittently)	VOC (0.22)	0.23	The Respondents reported excess emissions during intermittent warm starts.	The Respondents submitted a permit application to reconcile the warm start emission limits for EQT 0051 in PSD-LA-805 (M-4). On or about March 10, 2025, the Department issued PSD Permit No. PSD-LA-805 (M- 4), which increased this limit.

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Pollutant (Permit Limit max lbs./hr.)	Total Amount in Excess of Limit (lbs.)	Reported Deviation	Corrective Action
25.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0001 (0560- 00987-V4)	8/6/2023 01:00 AM - 8/6/2023 02:00 AM (1 hr.)	NOx (13.8)	1.57	The Respondents reported activation of an automatic transfer scheme on August 6, 2023, at which time the alternate power supply was unavailable, and in turn, power was interrupted to the ammonia pumps for selective catalytic reduction (SCR), which is used to control Nitrogen Oxides (NOx) emissions for Combined Cycle Combustion Turbines. The interruption of the ammonia flow for SCR resulted in an exceedance of the permitted maximum hourly emission limit for NOx for Combined Cycle Combustion Turbine 1 (CCCT1).	Operations personnel restored the power to the E-house to reestablish the service of the ammonia forwarding pumps and returned CCCT1 to emissions compliance mode.
26.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0003 (0560- 00987-V4)	8/6/2023 01:00 AM - 8/6/2023 02:00 AM (1 hr.)	NOx (13.8)	4.14	The Respondents reported activation of an automatic transfer scheme on August 6, 2023, at which time the alternate power supply was unavailable, and in turn, power was interrupted to the ammonia pumps for SCR, which is used to control NOx emissions for Combined Cycle Combustion Turbines. The interruption of the ammonia flow for SCR resulted in an exceedance of the permitted maximum hourly emission limit for NOx for CCCT3.	Operations personnel restored the power to the E-house to reestablish the service of the ammonia forwarding pumps and returned CCCT3 to emissions compliance mode.

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Pollutant (Permit Limit max lbs./hr.)	Total Amount in Excess of Limit (lbs.)	Reported Deviation	Corrective Action
27.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0005 (0560- 00987-V4)	8/30/2023 01:00 AM - 8/30/2023 02:00 AM (1 hr.)	CO (16.8)	0.71	The Respondents reported the Carbon Monoxide (CO) maximum lb./hr. emission limit for CCCT5 was exceeded on August 30, 2023.	<p>The Respondents reported Operations personnel recalibrated the continuous emissions monitoring system (CEMS) and reviewed the tuning parameters to ensure CCCT5 was within the combustion design parameters. Additionally, samples of the catalyst oxidation bed were tested and confirmed to ensure operation within the design parameters. The facility reported steps taken to determine the cause of the deviation were as follows:</p> <ul style="list-style-type: none"> • Review of combustion performance by the manufacturer to determine if there was incomplete combustion; • Analysis of samples from the catalyst oxidation bed; • Measurement of CO concentration at the inlet and outlet of the CO catalyst bed.
28.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0001 (0560- 00987-V4)	9/8/2023 03:00 PM - 9/8/2023 04:00 PM (1 hr.)	NOx (13.8)	155.35	The Respondents reported a fault with a 120-volt plug interrupted power to the aqueous ammonia injection system (used as Selective Catalyst Reduction) on September 8, 2023, which resulted in an exceedance of the permitted maximum hourly emission limit for NOx for Combined Cycle Combustion Turbine 1 (CCCT1).	Operations personnel placed the aqueous ammonia injection system in manual mode, returned CCCT1 to emission compliance as soon as possible, and changed the faulty 120-volt plug.

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Pollutant (Permit Limit max lbs./hr.)	Total Amount in Excess of Limit (lbs.)	Reported Deviation	Corrective Action
29.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0051 (SCN 0013) (0560- 00987-V4)	9/13/2023 06:00 AM - 11/28/2023 08:00 AM (3 hrs. inter- mittently)	VOC (0.26)	0.10	The Respondents reported excess emissions during shutdowns.	The Respondents submitted a permit application to reconcile the maximum hourly emissions for SCN 0013 in Title V Air Permit No. 0560-00987-V4. On or about March 10, 2025, the Department issued Title V Air Permit No. 0560-00987- V5, which removed the SCN 0013 emission limits.
30.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0051 (PSD-LA- 805 (M-4))	9/13/2023 06:00 AM - 11/28/2023 08:00 AM (3 hrs. inter- mittently)	VOC (0.22)	0.22	The Respondents reported excess emissions during shutdowns.	The Respondents submitted a permit application to reconcile the shutdown emission limits for EQT 0051 in PSD-LA-805 (M-4). On or about March 10, 2025, the Department issued PSD Permit No. PSD-LA-805 (M- 4), which increased this limit.
31.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0051 (PSD-LA- 805 (M-4))	9/13/2023 06:00 AM - 11/28/2023 08:00 AM (3 hrs. inter- mittently)	CO (9.04)	0.07	The Respondents reported excess emissions during shutdowns.	The Respondents submitted a permit application to reconcile the shutdown emission limits for EQT 0051 in PSD-LA-805 (M-4). On or about March 10, 2025, the Department issued PSD Permit No. PSD-LA-805 (M- 4), which increased this limit.

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Pollutant (Permit Limit max lbs./hr.)	Total Amount in Excess of Limit (lbs.)	Reported Deviation	Corrective Action
32.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0004 (0560- 00987-V4)	9/13/2023 12:00 PM - 10/3/2023 05:00 AM (5 inter- mittently)	CO (16.8)	3.37	The Respondents reported the CO maximum lb./hr. emission limit for Combined Cycle Combustion Turbine 4 (CCCT4) was exceeded intermittently for five hours during the period September 13, 2023 to October 3, 2023.	The Respondents reported Operations personnel recalibrated the CEMS, reviewed the tuning parameters to ensure the CCCT4 was within the combustion design parameters, and returned the turbine to shift the bias between NOx and CO. Additionally, samples of the catalyst oxidation bed were tested and confirmed to ensure operation within the design parameters. The facility reported steps taken to determine the cause of the deviation were as follows: <ul style="list-style-type: none"> • Review of combustion performance by the manufacturer to determine if there was incomplete combustion; • Analysis of samples from the catalyst oxidation bed; • Measurement of CO concentration at the inlet and outlet of the CO catalyst bed.
33.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0001 (0560- 00987-V4)	10/31/2023 11:00 AM - 10/31/2023 12:00 PM (1 hr.)	NOx (13.8)	111.07	The Respondents reported a voltage transformer fuse blew, which caused a sudden step change in the megawatt (MW) signal feed to the control system, resulting in Combined Cycle Combustion Turbine 1 (CCCT1) transferring into lean-lean combustion mode on October 31, 2023.	Operations personnel performed a high load transfer of CCCT1 and restored the turbine into pre-mix combustion mode and emissions compliance. The facility additionally reported implementation of a project to replace the fuses with a vendor-approved higher amperage fuses which is anticipated to mitigate future occurrences of such incidents.

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Pollutant (Permit Limit max lbs./hr.)	Total Amount in Excess of Limit (lbs.)	Reported Deviation	Corrective Action
34.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0004 (0560- 00987-V4, PSD-LA- 805 (M-4))	11/27/2023 01:00 AM - 11/27/2023 02:00 AM (1 hr.)	NOx (48.7)	18.97	The Respondents reported permitted NOx emissions limits under Permit No. PSD-LA-805 (M-4) were exceeded during Warm Start of Combined Cycle Combustion Turbine 4 (CCCT4) on November 27, 2023.	The Respondents reported the permitted maximum emission limit for NOx for CCCT4 during startup and shutdown under Alternate Operating Scenario SCN 0008 of Title V Air Permit No. 0560-00987-V4 was not exceeded. The facility reported Operations Personnel minimized the emissions and ramped up CCCT4 above MECL to return the unit to emission compliance mode.
35.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0051 (0560- 00987-V4)	11/27/2023 06:00 AM - 11/27/2023 09:00 AM (3 hrs.)	NOx (2.65)	1.71	EQT 0051 was inaccurately tuned for winter at a higher temperature than desired, and a sudden drop in ambient temperature resulted in an exceedance of the permitted maximum lb/hour emission limit for NOx for the turbine unit on November 27, 2023.	EQT 0051 was shutdown and retuned at the appropriate winter temperature. The Respondents proposed re-evaluation of the schedule for tuning EQT 0051 to align with appropriate ambient temperatures for winter and summer.
36.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0051 (PSD-LA- 805 (M-4))	12/20/2023 10:00 AM - 12/20/2023 05:00 PM (7 hrs.)	NOx (15.4)	111.43	After a facility-wide blackout caused by faults in a transmitter, which initiated an emergency shutdown, EQT 0051 was brought online to restore operations on December 20, 2023. The subsequent restart resulted in EQT 0051 operating below the MECL during the startup due to the facility's electrical restoration issues. The Respondents reported the permitted startup, shutdown, and maintenance (SSM) NOx emission limit for the Title V Air Permit was not exceeded; however, the PSD permit's Cold Start maximum limit was exceeded.	Once the liquefaction trains became available after the facility-wide blackout, operations personnel started to supply the power to the liquefaction trains, which restored EQT 0051 into Dry Low NOx 25 or Dry Low NOx 50 Mode (minimum emissions compliance load). The Respondents also reported review of turbine startup sequencing to place the power demand more rapidly on the turbines to minimize the time the turbine operates below the MECL.

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Pollutant (Permit Limit max lbs./hr.)	Total Amount in Excess of Limit (lbs.)	Reported Deviation	Corrective Action
37.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0001 (SCN 0005) (0560- 00987-V4, PSD-LA- 805 (M-4))	12/20/2023 05:00 PM - 12/20/2023 07:00 PM (2 hrs.)	NOx (93.07)	405.26	The Respondents reported, after a facility-wide blackout that was a result of faults in a transmitter that initiated an emergency shutdown, Combined Cycle Combustion Turbine 1 (CCCT1) was brought online to restore operations on December 20, 2023. The subsequent restart resulted in CCCT1 operating below the MECL during the startup until sufficient load from the liquefaction trains was available.	Once the liquefaction trains became available after the facility-wide blackout, operations personnel started to supply the power to the liquefaction trains which restored CCCT1 into premix combustion mode. The Respondents also reported review of turbine startup sequencing to place the power demand more rapidly on the turbines to minimize the time the turbine operates below the MECL.
38.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	SCN 0009 (0560- 00987-V4)	12/21/2023 04:00 AM - 12/21/2023 07:00 AM (3 hrs.)	NOx (93.07)	91.26	The Respondents reported after a facility-wide blackout occurred that was a result of faults in a transmitter that initiated an emergency shutdown, CCCT5 was brought online to restore operations on December 21, 2023. The subsequent restart resulted in CCCT5 operating below the MECL during the startup until sufficient load from the liquefaction trains was available.	The Respondents reported once the liquefaction trains became available after the facility-wide blackout, operations personnel started to supply the power to the liquefaction trains, which restored CCCT5 into premix combustion mode. The Respondents also reported review of turbine startup sequencing to place the power demand more rapidly on the turbines to minimize the time the turbine operates below the MECL.
39.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0051 (PSD-LA- 805 (M-4))	12/27/2023 02:00 PM - 12/27/2023 04:00 PM (2 hrs.)	VOC (0.22)	0.14	The Respondents reported excess emissions during a cold start.	The Respondents submitted a permit application to reconcile the cold start emission limits for EQT 0051 in PSD-LA-805 (M-4). On or about March 10, 2025, the Department issued PSD Permit No. PSD-LA-805 (M-4), which increased this limit.

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Pollutant (Permit Limit max lbs./hr.)	Total Amount in Excess of Limit (lbs.)	Reported Deviation	Corrective Action
40.	2023 Title V 2nd Semi- Annual Monitoring Report (3/27/2024)	EQT 0051 (SCN 0013) (0560- 00987-V4)	12/27/2023 02:00 PM - 12/27/2023 04:00 PM (2 hrs.)	VOC (0.26)	0.06	The Respondents reported excess emissions during a cold start.	The Respondents submitted a permit application to reconcile the maximum hourly emissions for SCN 0013 in Title V Air Permit No. 0560-00987-V4. On or about March 10, 2025, the Department issued Title V Air Permit No. 0560-00987- V5 which removed the SCN 0013 emission limits.
41.	2024 Title V 1st Semi-Annual Monitoring Report (9/26/2024)	EQT 0004 (0560- 00987-V4)	3/3/2024 01:00 AM - 3/3/2024 04:00 AM (3 hrs.)	NOx (13.8)	125.12	The Respondents reported a late lean injection gas control valve (GCV) on CCCT1 (EQT 0001) experienced a malfunction and caused a load swing in the Power Island System (PIS) resulting in EQT 0004 and EQT 0005 transferring into lean-lean combustion mode and exceeded the NOX emission limits.	The Respondents stated this incident was an upset under the regulations; however, the Respondents did not notify the Department of the upset condition as required by the regulations. The Respondents reported upon further investigation, that a fuse failure caused an electrical transient and resulted in the combustion mode transfer on EQT 0005. The fuse was designed per specifications from the manufacturer, and the manufacturer recommended upgrading the fuse from 0.5 amps to 2.0 amps to minimize the recurrence of similar events. The Respondents performed these changes on all combined cycle combustion turbines.

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Pollutant (Permit Limit max lbs./hr.)	Total Amount in Excess of Limit (lbs.)	Reported Deviation	Corrective Action
42.	2024 Title V 1st Semi-Annual Monitoring Report (9/26/2024)	EQT 0005 (0560- 00987-V4)	3/3/2024 01:00 AM - 3/3/2024 04:00 AM (3 hrs.)	NOx (13.8)	605.09	The Respondents reported a late lean injection gas control valve (GCV) on CCCT1 (EQT 0001) experienced a malfunction and caused a load swing in the PIS resulting in EQT 0005 transferring into lean-lean combustion mode and exceeded the NOX emission limits. The Respondents reported that while operators performed a high load transfer function on EQT 0004, a blown potential transformed fuse resulted in tripping EQT 0004; therefore, to minimize emissions and prevent a plant-wide blackout, the load on EQT 0005 was lowered and returned to premix combustion mode after restoring EQT 0004 to emissions compliance.	The Respondents stated this incident is an upset under the regulations; however, the Respondents did not notify the Department of the upset condition as required by the regulations. The Respondents reported upon further investigation, that a fuse failure caused an electrical transient and resulted in the combustion mode transfer on EQT 0005. The fuse was designed per specifications from the manufacturer, and the manufacturer recommended upgrading the fuse from 0.5 amps to 2.0 amps to minimize the recurrence of similar events. The Respondents performed these changes on all combined cycle combustion turbines.
43.	2024 Title V 1st Semi-Annual Monitoring Report (9/26/2024)	EQT 0002 (0560- 00987-V4)	4/2/2024 09:00 AM - 4/2/2024 10:00 AM (1 hr.)	NOx (13.8)	1.66	The Respondents reported that tuning was being performed on CCCT2 (EQT 0002) which resulted in the turbine operating in lean-lean combustion mode for approximately five (5) minutes, causing a NOX emissions exceedance. The startup/shutdown limit (SCN 0006) was not exceeded.	The Respondents reported that operators promptly transferred EQT 0002 into premix combustion mode as soon as tuning was complete. The Respondents stated maintenance activities are covered under the SCN limits rather than the EQT maximum hourly limits; however, the Department has determined that the SCN limits do not apply to this scenario, and instead the normal operating rates apply.

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Pollutant (Permit Limit max lbs./hr.)	Total Amount in Excess of Limit (lbs.)	Reported Deviation	Corrective Action
44.	2024 Title V 1st Semi-Annual Monitoring Report (9/26/2024)	EQT 0001 (0560- 00987-V4)	4/19/2024 07:00 PM - 4/19/2024 08:00 PM (1 hr.)	NOx (13.8)	25.60	<p>The Respondents reported the permitted maximum lb./hr. NOx emissions limit for CCCT1 (EQT 0001) were exceeded on April 19, 2024, during installation of a second, redundant UPS to the control room. The Respondents reported temporary power was installed during the planned electrical panel outages to support critical loads while the new UPS was being connected. During this time, the circuit breaker in the temporary power panel providing power to the communication cabinet tripped, resulting in an unexpected shutdown of the entire liquefaction facility (i.e., Pretreatment Systems, Liquefaction Train Systems, and Storage, Loading, and Utilities). Due to this unexpected event, the load demand for the PIS dramatically decreased, resulting in all turbines transferring into lean-lean combustion mode, and the permitted maximum lb./hr. NOx emissions for CCCT1 were exceeded.</p>	<p>Operations personnel promptly shutdown CCCT4 (EQT 0004) due to the unexpected fluctuation of power demand and lower power demand due to shutdown of Liquefaction facility, and transferred CCCT1 and CCCT2 to premix combustion mode and thus, emissions compliance. The facility reported the temporary power panel was demobilized from the site after the new redundant UPS was commissioned in April 2024.</p>

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Pollutant (Permit Limit max lbs./hr.)	Total Amount in Excess of Limit (lbs.)	Reported Deviation	Corrective Action
45.	2024 Title V 1st Semi-Annual Monitoring Report (9/26/2024)	EQT 0002 (0560- 00987-V4)	4/19/2024 07:00 PM - 4/19/2024 08:00 PM (1 hr.)	NOx (13.8)	31.39	<p>The Respondents reported the permitted maximum lb./hr. NOx emissions limit for EQT 0002 were exceeded on April 19, 2024, during installation of a second, redundant UPS to the control room. The Respondents reported temporary power was installed during the planned electrical panel outages to support critical loads while the new UPS was being connected. During this time, the circuit breaker in the temporary power panel providing power to the communication cabinet tripped, resulting in an unexpected shutdown of the entire liquefaction facility (i.e., Pretreatment Systems, Liquefaction Train Systems, and Storage, Loading, and Utilities). Due to this unexpected event, the load demand for the PIS dramatically decreased, resulting in all turbines transferring into lean-lean combustion mode, and the permitted maximum lb./hr. NOx emissions for EQT 0002 were exceeded.</p>	<p>Operations personnel promptly shutdown CCCT4 (EQT 0004) due to the unexpected fluctuation of power demand and lower power demand due to shutdown of Liquefaction facility, and transferred CCCT1 and CCCT2 to premix combustion mode and thus, emissions compliance. The facility reported the temporary power panel was demobilized from the site after the new redundant UPS was commissioned in April 2024.</p>

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Pollutant (Permit Limit max lbs./hr.)	Total Amount in Excess of Limit (lbs.)	Reported Deviation	Corrective Action
46.	2024 Title V 1st Semi-Annual Monitoring Report (9/26/2024)	EQT 0003 (0560- 00987-V4)	4/19/2024 07:00 PM - 4/19/2024 08:00 PM (1 hr.)	NOx (13.8)	30.56	The Respondents reported the permitted maximum lb./hr. NOx emissions limit for CCCT3 (EQT 0003) were exceeded on April 19, 2024, during installation of a second, redundant UPS to the control room. The Respondents reported temporary power was installed during the planned electrical panel outages to support critical loads while the new UPS was being connected. During this time, the circuit breaker in the temporary power panel providing power to the communication cabinet tripped, resulting in an unexpected shutdown of the entire liquefaction facility (i.e., Pretreatment Systems, Liquefaction Train Systems, and Storage, Loading, and Utilities). Due to this unexpected event, the load demand for the PIS dramatically decreased, resulting in all turbines transferring into lean-lean combustion mode, and the permitted maximum lb./hr. NOx emissions for CCCT3 were exceeded.	Operations personnel promptly shutdown CCCT4 (EQT 0004) due to the unexpected fluctuation of power demand and lower power demand due to shutdown of Liquefaction facility, and transferred CCCT3 to premix combustion mode and thus, emissions compliance. The facility reported the temporary power panel was demobilized from the site after the new redundant UPS was commissioned in April 2024.
47.	2024 Title V 1st Semi-Annual Monitoring Report (9/26/2024)	EQT 0051 (0560- 00987-V4)	5/13/2024 11:00 AM - 5/24/2024 04:00 AM (4 hrs. inter- mittently)	NOx (2.65)	21.74	The Respondents reported an instrumentation malfunction in the CEMS resulted in the interruption of the ammonia injection flow, which caused ASCCT1 to exceed the permitted NOx and NH3 maximum hourly emission limits.	The faulty instrument on the CEMS was replaced and re-calibrated to ensure the sufficient aqueous ammonia will be injected to the SCR system. Additionally, the Respondents proposed implementation of an alarm to notify the operations personnel if the Aqueous Ammonia Injection Valve closes while the turbine is operating above the MECL.

	Report (Date)	Emission Source (Permit)	Incident Date(s) (Duration)	Pollutant (Permit Limit max lbs./hr.)	Total Amount in Excess of Limit (lbs.)	Reported Deviation	Corrective Action
48.	2024 Title V 1st Semi-Annual Monitoring Report (9/26/2024)	EQT 0051 (0560- 00987-V4)	5/13/2024 11:00 AM - 5/24/2024 04:00 AM (4 hrs. inter- mittently)	NH3 (1.82)	0.13	The Respondents reported an instrumentation malfunction in the CEMS resulted in the interruption of the ammonia injection flow, which caused ASCCT1 to exceed the permitted NOx and NH3 maximum hourly emission limits.	The faulty instrument on the CEMS was replaced and recalibrated to ensure the sufficient aqueous ammonia will be injected to the SCR system. Additionally, the Respondents proposed implementation of an alarm to notify the operations personnel if the Aqueous Ammonia Injection Valve closes while the turbine is operating above the MECL.

Each emissions exceedance is a violation of SR 105 of Title V Air Permit No. 0560-00987-V4 and/or Specific Condition 4 of PSD Permit No. PSD-LA-805 (M-4), LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and La. R.S. 30:2057(A)(2).

H. The Respondents failed to submit reports, no later than fourteen (14) days from the initial occurrence of the release event, for any emission in excess of permit emission limitations, regardless of the amount, where such emission occurs over a period of seven (7) days or longer. Specifically, the Respondents reported emission exceedances, which lasted over the course of seven (7) days or more, and/or were seven (7) days or longer in duration. These emissions exceedances are cited in Findings of Fact Paragraphs IV.2, 3, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 33, 34, 50, 51, 52, 53, 103, 104, 105, 109, 110, 111 and Findings of Fact VII.G.1, 2, 3, 5, 17, 18, 19, 20, 21, 22, 23, 24, 29, 30, 31, and 32. The Respondents reported these emission exceedances in the Title V Semi-Annual Monitoring Reports for the applicable reporting periods; however, the Respondents did not submit excess emission written reports within fourteen (14) days from the initial occurrence of the release event for any of the aforementioned emission exceedances. Each failure to submit reports, no later than fourteen (14) days from the initial occurrence of the release event, for any emission in excess of permit emission limitations, regardless of the amount, where such emission occurs over a period of seven (7) days or longer is a violation of LAC 33:III.535.General Condition R.2, SR 120 of Title V Air Permit No. 0560-00987-V4, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2)."

- I. The Respondents failed to submit the performance or emission test results to the Office of Environmental Services within sixty (60) days after the performance or emissions test. Specifically, the Respondents reported in the 2023 Title V 2nd Semi-Annual Monitoring Report dated March 27, 2024, that the initial performance test results for CCCT3 – Combined Cycle Combustion Turbine 3 (EQT 0003) were not located in the Department’s Electronic Document Management System (EDMS). The Respondents believe that the results for this test were submitted with the CEMS Relative Accuracy Test Audit (RATA) report on December 8, 2022; however, there was no record of the performance test results for EQT 0003 in EDMS, nor was there record of submittal via certified mail tracking information or other means to verify the Department received the performance test results. The Respondents delivered the performance test results, dated March 29, 2024, to the Department on April 2, 2024; however, the test was conducted on October 10 – 13, 2022. The failure to submit the performance or emission test results to the Office of Environmental Services within sixty (60) days after the performance or emissions test is a violation of SR 23 of Title V Air Permit No. 0560-00987-V4, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).”

III.

The Department hereby adds Paragraphs VIII, IX, X, and XI to the Order Portion of **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. AE-CN-22-00367**, as follows:

“VIII.

To institute procedures to ensure notifications and reports required by LAC 33:I.Chapter 39, LAC 33:III.535.General Condition R.2, and SR 195 of Title V Air Permit No. 0560-00987-V5, as mentioned in Findings of Fact Paragraph VII.H, are submitted to the Department and meet all requirements for notification and reporting.

IX.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, documentation, in electronic format via electronic mail to the point of contact listed on this **COMPLIANCE ORDER**, of the visible emissions observations conducted at the facility on the flares (EQTs 0013, 0014, 0015, and 0016) in the 2022 through 2024 calendar years.

X.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, the information denoted by ***not specified*** as denoted in Findings of Fact Paragraphs VII.G.21 – 22.

XI.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, documentation demonstrating that the tuning schedule for EQT 0051 has been re-evaluated as referenced in Findings of Fact Paragraph VII.G.35.”

IV.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY**, a written report that includes a detailed description of the circumstances surrounding the cited violations added in this **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** and actions taken or to be taken to achieve compliance with the Order Portion of this **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY**. This report and all other reports or information required to be submitted to the Enforcement Division by this **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** shall be submitted to:

Office of Environmental Compliance
Post Office Box 4312
Baton Rouge, Louisiana 70821-4312
Attn: James “Bailey” Macmurdo
Re: Enforcement Tracking No. AE-CN-22-00367A
Agency Interest No. 194203

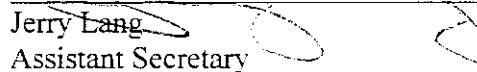
V.

The Department incorporates all of the remainder of the original **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. AE-CN-22-00367** and **AGENCY INTEREST NO. 194203** as if reiterated herein.

VI.

This **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is effective upon receipt.

Baton Rouge, Louisiana, this 9th day of May, 2025.



Jerry Lang
Assistant Secretary
Office of Environmental Compliance

Copies of a request for a hearing and/or related correspondence should be sent to:

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
Post Office Box 4312
Baton Rouge, LA 70821-4312
Attention: James "Bailey" Macmurdo