

#### **Analysis of Emissions Monitoring Reports**

In its first year of operations, Venture Global Calcasieu Pass had over 2,000 permit violations. Instead of solving the operational problems causing these accidents, Venture Global is asking the Louisiana Department of Environmental Quality (LDEQ) for emissions increases to cover the violations.

The following analysis of these reports was conducted by John Alliare, Mr. Allaire lives next door to Venture Global's Calcasieu Pass (VGCP) facility. He worked as an environmental engineer for BP / Amoco for over 30 years.

On March 17, 2023 Venture Global Calcasieu Pass (VGCP) requested that the Louisiana Department of Environmental Quality (LDEQ) grant a major modification to its current Air Permit #0560-00987-V-4. Venture Global is also requesting that the LDEQ grant air permits for an expansion of the Calcasieu Pass terminal and a terminal in Plaquemines Parish, Louisiana. Both of these plants are of similar design to the existing VGCP facility which has been in operation since January of 2022. Venture Global's permit application for its Plaquemines facility says that the facility would be "technologically identical" to VGCP.

#### **VGCP Air Permit Compliance History**

This information was obtained from the VGCP certified 2022 semi-annual deviation reports that was submitted to the LDEQ on March 30, 2023. VGCP recorded over 2000 deviations from 17 separate emission sources at its facility. Each of these deviations represents a release of pollutants that exceeds the limits set in their air permit. Each of exceedances can be considered a permit violation for enforcement purposes. The 2022 VGCP Deviation Report includes numerous cases of specific pieces of equipment exceeding permit limits for multiple

pollutants. Additionally, as detailed in the report by VGCP, many of these permit exceedances occurred over multiple consecutive days. In total, out of 343 days of operation last year the facility was in violation of their permit for 286 days, meaning they were only in compliance for 17% of their time in operation last year.

#### **Examples as follows:**



**Emission Source EQT 0008** was out of compliance from January 22, 2022 until June 14, 2022 for carbon monoxide, volatile organic compounds, , Hazardous Air Pollutants and Toxic Air

Pollutants. Over this 143 day period VGCP knew it was violating its permit limits but continued to operate.

**Emission Source EQT 0007** was out of compliance for over 120 days in 2022 exceeding permit limits for VOCs, NOx, CO, Sulphur dioxide, and particulate matter.

There were 15 additional emission sources that had multiple permit exceedances during 2022. There were 32 separate occurrences in 2022 when VGCP continued to operate for more than 10 consecutive days with an emission source operating out of permit compliance limits.

VGCP deviation report details that of the 343 days they were operating in 2022 they were out of compliance with their air permit 286 of those days. The 2022 violations averaged 168 violations a month for 2023. VGCP facility was in compliance with their air permit 17% of the days in 2022.

As an excuse for noncompliance VGCP's deviation report repeatedly states the following (pp. 1- of Revised 1st Semiannual Monitoring report dated 01/01-6/31/2022): "As described in a letter dated February 5, 2022, the hot oil heaters are a designed solution for the facility and since initial startup, they have experienced unexpected outages beyond the control of CP. The outages were caused primarily (but not exclusively) 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 caused the hot oil heater to trip."

What Venture Global is stating is that it selected and approved this design for installation. The company installed said design. It was a bad choice of design but the company will continue to operate the equipment while knowingly exceeding permit limits. How is it "beyond the control of CP"? It could shut down and then reengineer and install equipment that would operate as designed.



The fact is that in 2022, VGCP has continued to operate out of compliance so that it could ship 128 cargoes of liquified gas to the highest overseas bidders and maximize profits at the expense of Louisiana's air quality.

#### Permit modifications requested

VGCP is requesting the following major modifications to its air permit to release additional pollutants, These changes include:

- Permission to increase flaring hours from current permit of 60 hours per year to 500 hours per year. This is an 833% increase.
- Permission to increase overall air emissions of pollutants by 680,883 tons per year from 3.9 million tons per year to 4.6 million tons per year. This is a 17% increase in toxic, hazardous, teratogenic, mutagenic or carcinogenic pollutants.
- A 17% increase of carbon dioxide for a total of 4.6 million tons per year.
- A 132% increase of an additional 115.44 tons per year mixture of undefined volatile organic compounds, hazardous air pollutants and toxic air pollutants for a total release of 202.61 tons per year.

# Venture Global Calcasieu Pass LNG:

# 1st Semiannual Monitoring Report Annotated Copy (01/01/-06/30/2022)

Annotations on pages 1, 6-11, 18 Original version can be found <u>here</u> Every industrial facility with an air permit is required to release a Semiannual Monitoring report detailing each violation of their permit limits over the given time period. Reports for the first half of the year are due September 30, and on March 31 of the following year for the second half.



2023 MAR

LDEO

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March 30, 2023

Title V Program
Office of Environmental Compliance
Enforcement Division
P.O. Box 4312
Baton Rouge, LA 70821-4312



MAR 3 1 2023 ORIGINAL ENFORCEMENT DIVISION

E: Revised 1st Half of Reporting Year 2022 Title V Semiannual Monitoring Report Reporting Period: 01/01/2022 - 06/30/2022

Venture Global Calcasieu Pass, LLC and TransCameron Pipeline, LLC Calcasieu Pass Project

Title V Permit Number: 0560-00987-V4 Agency Interest Number: 194203

Dear Sir or Madam,

Venture Global Calcasieu Pass, LLC and TransCameron Pipeline, LLC (Calcasieu Pass), a wholly owned subsidiary of Venture Global LNG, Inc., operates the natural gas liquefaction, storage, and export facilities at a liquefied natural gas terminal on the east side of the Calcasieu Ship Channel in Cameron Parish, Lousiana. The facility is currently authorized under Title V Permit Number 0560-00987-V4 and Prevention of Significant Deterioration (PSD) Permit Number PSD-LA-805(M-4) issued on July 1, 2021 by the Louisiana Department of Environmental Quality (LDEQ).

Calcasieu Pass timely submitted its Title V Semiannual Monitoring Report (Title V SAMR) for the 1<sup>st</sup> Half of Reporting Year 2022. While preparing the 2<sup>nd</sup> Half of Reporting Year 2022 Title V SAMR, Calcasieu Pass discovered some of the deviations were incorrectly reported in the 1<sup>st</sup> Half of Reporting Year 2022 Title V SAMR. Subsequently, Calcasieu Pass conducted a detailed reevaluation of this time period.

Calcasieu Pass is submitting a revised Title V SAMR for the reporting period January 1, 2022 through June 30, 2022 to take the place of the previously submitted report for the same time period. As such, Calcasieu Pass submits herein the revised Title V Semiannual Monitoring Report for Title V Permit Number 0560-00987-V4 for the reporting period January 1, 2022 through June 30, 2022.

Venture Global is operating in Cameron Parish via numerous subsidiaries (11 known)

The prior version of this report noted 32 permit deviations, this one has 75.

<sup>&</sup>lt;sup>1</sup> Refer to EDMS Document ID 13605970.

The attached Title V SAMR removes some of the prior reported deviations as well as adds additional deviations. The deviations consist primarily of intermittent exceedances of maximum hourly emissions limits (pounds per hour). No exceedances of annual emission limits (tons per year) occurred for any permitted emission source. In addition, Calcasieu Pass complied with the underlying regulatory standard. As described in the attached Title V SAMR, Calcasieu Pass has taken measures to correct any deviations.

Should you have any questions or require additional information, please contact Balaji Ganesan at (419) 508-4623 or at bganesan@venturegloballng.com.

Sincerely,

Andy Vaughan Vice President, Operations

Venture Global Calcasieu Pass, LLC &

TransCameron Pipeline, LLC

Attachment

Title V Semiannual Monitoring Report (01/01/2022 - 06/30/2022)



# (Facility Identification)

77	mm/dd/vv		mm/dd/vv	
applicable Reporting Period:	1/1/22	to	6/30/22	

	C	ompany and Facil	ity Identification								
Permit Number	0560-00987-V4	Parish	CAMERON	Date Permit Issued	7/1/21						
Company Name	VENTURE GLOBAI	CALCASIEU	PASS, LLC								
Facility Name	CALCASIEU PASS	CALCASIEU PASS PROJECT Agency Interest Number									
Mailing Address	516 Davis Road										
City	Cameron	State	LA	Zip Code	70631						
Contact Person	Fax#										
Principal Facility Product/Business	LNG										

Certification of Truth, Accuracy,	and Completeness		
I certify, based on information and belie document are true, accurate, and compl		the statements a	nd information in this
Responsible Official (signature)	Orly Vayhor		
Responsible Official (typed)	Andy Vaughan	Date	29-MAR-2023
Responsible Official Title	Vice President, Operation	ns	





D	eviation Reportin	g	
Title V Permit Number: 0560-00987-V4	Company Name:	VENTURE GLOB	AL CALCASIEU PASS, LLC
Facility Name: CALCASIEU PASS PROJ	ECT	AI Number:	194203
Question	Response (Yes/No)		peen previously reported, please ort and date of the report.
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	Yes	2022 (ED Unauthorized Discha	arge Written Report; Dated July 27, MS Doc ID: 13462522). rge Written Report - OS1481; Dated 22 (EDMS Doc ID 13136388)

<sup>\*</sup> As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in the "Deviation Summary Report."

Only two of seventy-five violations in this report were reported at the time of their occurrence to Louisiana Department of Environmental Quality

This column lists the piece of equipment that emissions are coming from

6		
4		
1.04	SIANA	

#### Louisiana DEQ Title V Semiannual Monitoring Form

No indication that the underlying design problem is solved

						Deviati	on Summ	ary Repo	rt			
	V Permit Number	•	0560-00987-V4	-		Comp				CALCASIEU PA		
	Name:		CALCASIEU PASS PROJECT		I B "	I note		I Number:		Table of	194203	Corrective Action(s) Taken
Emission So No./ I lentifi		Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency	Date	on Began	Date	tion Ended Time	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
EQT 0006	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously		2:00 PM	4/15/22	12:00 AM	5 (intermittently)	As described in a letter dated February 5, 2022 (EDMS Document ID 13167131), the hot oil heaters are a custom designed solution for the facility and since initial startup, they have experienced unexpected outages beyond the control of Calcasieu Pass. The 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.  Estimated NOx max. pounds per hour: 4.90 lb/hr - 4.95 lb/hr	Calcasieu Pass worked with the manufacturer of the hot oil heaters to replace parts and implemented mitigation measures to reduce the emissions.  Additionally, on March 17, 2023 (EDMS Docume ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No. 0560-00987 V4 to update the maximum hourly emission rate.
EQT 0006	со	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	4/15/22	9:00 AM	5/1/22	3:00 AM	65 (intermittently)	As described in a letter dated February 5, 2022 (EDMS Document ID 13167131), the hot oil heaters are a custom designed solution for the facility and, since initial startup, they have experienced unexpected outages beyond the control of Calcasieu Pass since. The 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.  Estimated CO max. pounds per hour: 10.44 lb/hr - 11.05 lb/hr	Calcasieu Pass worked with the manufacturer of th hot oil heaters to replace parts and implemented mitigation measures to reduce the emissions.  Additionally, on March 17, 2023 (EDMS Docume ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No. 0560-00987 V4 to update the maximum hourly emission rate.
EQT 0006	PM	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	4/15/22	2:00 PM	5/1/22	3:00 AM		As described in a letter dated February 5, 2022 (EDMS Document ID 13167131), the hot oil heaters are a custom designed solution for the facility and, since initial startup, they have experienced unexpected outages beyond the control of Calcasieu Pass. The 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.  Estimated PM max. pounds per hour: 0.96 lb/hr - 1.0 lb/hr	Calcasieu Pass worked with the manufacturer of the hot oil heaters to replace parts and implemented mitigation measures to reduce the emissions.  Additionally, on March 17, 2023 (EDMS Docume ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No. 0560-00987 V4 to update the maximum hourly emission rate.
EQT 0006	VOC and HAPs/TAPs	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	4/15/22	2:00 PM	5/1/22	3:00 AM	(intermittently)	since initial startup, they have experienced unexpected outages beyond the control of Calcasieu Pass. The 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.	Calcasieu Pass worked with the manufacturer of the lot oil heaters to replace parts and implemented mitigation measures to reduce the emissions.  Additionally, on March 17, 2023 (EDMS Documer ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No. 0560-00987 V4 to update the maximum hourly emission rate.
EQT 0007	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	4/16/22	8:00 PM	4/16/22	12:00 AM	4	since initial startup, they have experienced unexpected outages beyond the control of Calcasieu Pass. The 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.	Calcasieu Pass worked with the manufacturer of the hot oil heaters to replace parts and implemented mitigation measures to reduce the emissions. Additionally, on March 17, 2023 (EDMS Documer ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No. 0560-00987 V4 to update the maximum hourly emission rate.



						Deviat	ion Summ	ary Repo	rt			
Title V Per	mit Number:		0560-00987-V4			Comp	any Name	VENTUE	E GLOBAL O	CALCASIEU PA	ASS, LLC	
Facility Name	:		CALCASIEU PASS PROJECT				Al Number:		35-27-17-1	194203		
Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring		on Began		tion Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
				Compliance Status	Frequency	Date	Time	Date	Time		As described in a letter dated February 5, 2022 (EDMS Document ID 13167131), the hot oil heaters are a custom designed solution for the facility a since initial startup, they have experienced unexpected outages beyond the	Calcasieu Pass worked with the manufacturer of the hot oil heaters to replace parts and implemented mitigation measures to reduce the emissions.
EQT 0007	со	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	2/26/22	5:00 PM	4/28/22	11:00 AM	87 (intermittently)	control of Calcasicu Pass. The outages were caused primarily by a design issu 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.  Estimated CO max. pounds per hour: 10.44 lb/hr - 11.24 lb/hr	Additionally, on March 17, 2023 (EDMS Documen ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No. 0560-00987-V4 to update the maximum hourly emission rate.
EQT 0007	РМ	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	4/16/22	8:00 PM	4/28/22	6:00 AM	74 (intermittently)	As described in a letter dated February 5, 2022 (EDMS Document ID 13167131), the hot oil heaters are a custom designed solution for the facility a since initial startup, they have experienced unexpected outages beyond the control of Calcasieu Pass. The outages were caused primarily by a design issu 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.	mitigation measures to reduce the emissions.  Additionally, on March 17, 2023 (EDMS Documen
EQT 0007	VOC and HAPs/TAPs	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	4/16/22	8:00 PM	4/28/22	11:00 AM	81 (intermittently)	As described in a letter dated February 5, 2022 (EDMS Document ID 13167131), the hot oil heaters are a custom designed solution for the facility as since initial startup, they have experienced unexpected outages beyond the control of Calcasieu Pass. The outages were caused primarily by a design issu 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.  Estimated VOC max. pounds per hour: 0.69 lb/hr - 0.74 lb/hr	mitigation measures to reduce the emissions.  Additionally, on March 17, 2023 (EDMS Documen
EQT 0008	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	3/1/22	12:00 PM	6/14/22	6:00 AM	29 (intermittently)	As described in a letter dated February 5, 2022 (EDMS Document ID 13167131), the hot oil heaters are a custom designed solution for the facility are since initial startup, they have experienced unexpected outages beyond the control of Calcasieu Pass. The outages were caused primarily by a design issu 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.  Estimated NOx max. pounds per hour: 4.92 lb/hr - 6.76 lb/hr	mitigation measures to reduce the emissions.  Additionally, on March 17, 2023 (EDMS Documen
EQT 0008	со	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	1/22/22	6:00 PM	6/14/22	6:00 AM	(intermittently)	As described in a letter dated February 5, 2022 (EDMS Document ID 13167131), the hot oil heaters are a custom designed solution for the facility ar since initial startup, they have experienced unexpected outages beyond the control of Calcasieu Pass. The 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.  Estimated CO max. pounds per hour: 10.44 lb/hr - 14.66 lb/hr	mitigation measures to reduce the emissions



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Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviati	on Began	Devia	tion Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
		, value		Compliance Status	Frequency	Date	Time	Date	Time			
EQT 0008	РМ	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	1/26/22	7:00 PM	6/14/22	6:00 AM	175 (intermittently)	As described in a letter dated February 5, 2022 (EDMS Document ID 13167131), the hot oil heaters are a custom designed solution for the facility and since initial startup, they have experienced unexpected outages beyond the control of Calcasieu Pass. The 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.  Estimated PM max. pounds per hour: 0.96 lb/hr - 1.33 lb/hr	Calcasieu Pass worked with the manufacturer of the hot oil heaters to replace parts and implemented mitigation measures to reduce the emissions.  Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No. 0560-00987-V4 to update the maximum hourly emission rate.
EQT 0008	VOC and HAPs/TAPs	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	1/22/22	6:00 PM	6/14/22	6:00 AM	202 (intermittently)	As described in a letter dated February 5, 2022 (EDMS Document ID 13167131), the hot oil heaters are a custom designed solution for the facility and since initial startup, they have experienced unexpected outages beyond the control of Calcasieu Pass. The 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.  Estimated VOC max. pounds per hour: 0.69 lb/hr - 0.96 lb/hr	Calcasieu Pass worked with the manufacturer of the hot oil heaters to replace parts and implemented mitigation measures to reduce the emissions.  Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No. 0560-00987-V4 to update the maximum hourly emission rate.
EQT 0009	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	3/19/22	9:00 PM	4/16/22	9:00 AM	60 (intermittently)	As described in a letter dated February 5, 2022 (EDMS Document ID 13167131), the hot oil heaters are a custom designed solution for the facility and since initial startup, they have experienced unexpected outages beyond the control of Calcasieu Pass. The 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.  Estimated NOx max. pounds per hour: 4.85 lb/hr - 5.35 lb/hr	Calcasieu Pass worked with the manufacturer of the hot oil heaters to replace parts and implemented mitigation measures to reduce the emissions.  Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No. 0560-00987-V4 to update the maximum hourly emission rate.
EQT 0009	со	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	3/19/22	9:00 PM	5/1/22	3:00 AM	211 (intermittently)	As described in a letter dated February 5, 2022 (EDMS Document ID 13167131), the hot oil heaters are a custom designed solution for the facility and, since initial startup, they have experienced unexpected outages beyond the control of Calcasieu Pass. The 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.  Estimated CO max. pounds per hour: 10.44 lb/hr - 12.01 lb/hr	Calcasieu Pass worked with the manufacturer of the hot oil heaters to replace parts and implemented mitigation measures to reduce the emis Additionally, on March 17, 2023 (EDI ID 13730261), Calcasieu Pass submit an application for the Renewal and Significant Modification of the Title V Permit No. 0560-1987-V4 to update the maximum hourly emission ra
EQT 0009	РМ	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	3/19/22	9:00 PM	5/1/22	3:00 AM	177		Calcasieu Pass worked with the manufacturer the hot oil heaters to replace parts and implements mitigation measures to reduce the emissions. Additionally, on March 17, 2023 (EDMS I) cument ID 13730261), Calcasieu Pass submitted application for the Renewal and Signific at Modification of the Title V Permit Nation 560-00987-V4 to update the maximum hourbashission rate.

Instead of correcting the problem, they are asking to increase their permit limits.



# Emissions are likely far higher, since Venture Global assumes a high combustion rate

Title V Per	mit Number:		0560-00987-V4				on Summ			CALCASIEU PA	ASS, LLC	
Facility Name:			CALCASIEU PASS PROJECT					I Number:			194203	
Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency	Deviation	on Began	Devia Date	tion E ded	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
EQT 0009	VOC and HAPs/TAPs	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	3/19/22	9:00 PM	5/1/22	4:00 A.	203 (intermittently)	As described in a letter dated February 5, 2022 (EDMS Document ID 13167131), the hot oil heaters are a custom designed solution for the facility and since initial startup, they have experienced unexpected outages beyond the control of Calcasieu Pass. The 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.  Estimated VOC max. pounds per hour: 0.69 lb/hr - 0.79 lb/hr	Calcasieu Pass worked with the manufacturer of the hot oil heaters to replace parts and implemented mitigation measures to reduce the emissions.  Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No. 0560-00987-V4 to update the maximum hourly emission rate.
EQT 0006	SO <sub>2</sub>		Comply with the requirements of PSD-LA-805 (M-4). This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-805 (M-4).	Records Review	Continuously	5/18/22	12:00 AM	6/30/22	12:00 AM	348 (intermittently)	Presence of dimethyl sulfide odorant in the pipeline feed gas.	The deviations were previously reported, as described in the Unauthorized Discharge Written Report dated July 27, 2022 (EDMS Document ID 13462522). Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Major Modification of the PSD Permit No. PSD-LA-805(M-4) to update the maximum hourly emission rate.
EQT 0007	SO <sub>2</sub>		Comply with the requirements of PSD-LA-805 (M-4). This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-805 (M-4).	Records Review	Continuously	5/18/22	12:00 AM	6/30/22	12:00 AM	203 (intermittently)	Presence of dimethyl sulfide odorant in the pipeline feed gas.	The deviations were previously reported, as described in the Unauthorized Discharge Written Report dated July 27, 2022 (EDMS Document ID 13462522). Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Major Modification of the PSD Permit No. PSD-LA-805(M-4) to update the maximum hourly emission rate.
EQT 0008	SO <sub>2</sub>	SR 111	Comply with the requirements of PSD-LA-805 (M-4). This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-805 (M-4).	Records Review	Continuously	5/18/22	12:00 AM	6/30/22	12:00 AM	158 (intermittently)	Presence of dimethyl sulfide odorant in the pipeline feed gas.	The deviations were previously reported, as described in the Unauthorized Discharge Written Report dated July 27, 2022 (EDMS Document ID 13462522). Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Major Modification of the PSD Permit No. PSD-LA-805(M-4) to update the maximum hourly emission rate.
EQT 0009	$SO_2$	SR 111	Comply with the requirements of PSD-LA-805 (M-4). This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-805 (M-4).	Records Review	.Continuously	5/18/22	12:00 AM	6/30/22	12:00 AM	345 (intermittently)	Presence of dimethyl sulfide odorant in the pipeline feed gas.	The deviations were previously reported, as described in the Unauthorized Discharge Written Report dated July 27, 2022 (EDMS Document ID 13462522). Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Major Modification of the PSD Permit No. PSD-LA-805(M-4) to update the maximum hourly emission rate.



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		Deviation Summary Report	Deviation Summary Report					
Title V Permit Number:	0560-00987-V4	Company Name: VENTURE GLOBAL CALCASI	EU PASS, LLC					
Facility Name:	CALCASIEU PASS PROJECT	Al Number:	194203					

Facility Name:	acility Name: CALCASIEU PASS PROJECT						A	I Number:			194203		
Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviati	on Began	Devia	tion Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) T ken	
				Compliance Status	Frequency	Date	Time	Date	Time				
EQT 0034	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/7/22	1:00 AM	3/7/22	2:00 AM	1	While commissioning the liquefaction facility, an upset occurred, resulting SCCT1 (EQT 0034) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 176.96 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT1 (EQT 0034) was returned to emissions compliance. The EMS becam available in November 2022 and will minimize trips of the turbines and will ensure the turbines operate within MECL and within premix operating mode.	
EQT 0034	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/7/22	8:00 PM	3/7/22	10:00 PM	2	While commissioning the liquefaction facility, an upset occurred, resulting in SCCT1 (EQT 0034) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 182.37 lb/hr and 43.11 lb/hr	Before the facility's Energy Management (Stem (EMS) was consistioned to the roads had to be manually adjusted and SCCT1 (EQT 0034) was returned to emissions compliance. The EMS becam available in November 2022 and will minimize trips of the turbines and will ensure the turbines operate within MECL and within premix operating mode.	
EQT 0034	со	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/9/22	9:00 AM	3/9/22	10:00 AM	1	While commissioning the liquefaction facility, an upset occurred, resulting in SCCT1 (EQT 0034) dropping into extended lean-lean operating mode, followed by a blackout.  Estimated CO max. pounds per hour: 160.76 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT1 (EQT 0034) was returned to emissions compliance. The EMS becam available in November 2022 and will minimize trips of the turbines and will ensure the turbines operate within MECL and within premix operating mode.	
EQT 0034	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/11/22	12:00 PM	3/11/22	3:00 PM	3	While commissioning the facility, an upset occurred, resulting in a load swing in SCCT1 (EQT 0034) causing the turbine to drop below MECL.  Estimated NOx max. pounds per hour: 296.65 lb/hr, 296.65 lb/hr, and 123.18 lb/hr.	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT1 (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.	
EQT 0034	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/15/22	11:00 AM	3/15/22	2:00 PM	3	While commissioning the facility, an upset occurred, resulting in SCCT1 (EQT 0034) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 115.21 lb/hr, 151.44 lb/hr, and 94.19 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT1 (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.	



Deviation Summary Report

Title V Permit Number: 0560-00987-V4

Facility Name: CALCASIEU PASS PROJECT

Company Name: VENTURE GLOBAL CALCASIEU PASS, LLC

Al Number: 194203

Facility Name	Facility Name: CALCASIEU PASS PROJECT AI Number: 194203											
Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviati	on Began	Devia	tion Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
			是有多数是一种企业的基础的。 第一个人们的一个人们的一个人们的一个人们的一个人们的一个人们的一个人们的一个人们的	Compliance Status	Frequency	Date	Time	Date	Time			
EQT 0034	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/20/22	11:00 PM	3/20/22	12:00 AM	-1	While commissioning the liquefaction facility, an upset occurred, resulting in SCCT1 (EQT 0034) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 86.63 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT1 (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.
EQT 0034	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/30/22	5:00 AM	3/30/22	7:00 AM	2	While commissioning the liquefaction facility, an upset occurred due to instrumentation failure, resulting in SCCT1 (EQT 0034) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 151.48 lb/hr and 42.67 lb/hr.	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT1 (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.
EQT 0034	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	4/5/22	10:00 AM	4/5/22	12:00 PM	2	While commissioning the liquefaction facility, an upset occurred, resulting in SCCT1 (EQT 0034) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 125.58 lb/hr and 44.65 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT1 (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.
EQT 0034	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	4/9/22	12:00 AM	4/9/22	2:00 AM	2	While commissioning the liquefaction facility, an instrumentation failure resulted in SCCT1 (EQT 0034) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 64.4 lb/hr and 184.89 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT1 (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.
EQT 0034	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	4/10/22	5:00 AM	4/10/22	7:00 AM	2	While commissioning the liquefaction facility, an upset occurred, resulting in a reduction in power and SCCT1 (EQT 0034) dropping below MECL.  Estimated NOx max. pounds per hour: 53.32 lb/hr and 137.65 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT1 (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.



Deviation Summary Report

Title V Permit Number: 0560-00987-V4 Company Name: VENTURE GLOBAL CALCASIEU PASS, LLC

Facility Name			CALCASIEU PASS PROJECT				A	I Number:			194203	
Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviati	on Began	Devia	tion Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
				Compliance Status	Frequency Date	Date	Time	Date	Time			
EQT 0034	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	4/12/22	7:00 AM	4/12/22	9:00 AM	2	While commissioning the liquefaction facility, an upset occurred due to a failed communication card which resulted in SCCT1 (EQT 0034) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 173.41 lb/hr and 42.8 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT1 (EQT 0034) was returned to emissions compliance and the faulty component was replaced. 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.
EQT 0034	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	4/13/22	12:00 PM	4/13/22	1:00 PM	1	While commissioning the liquefaction facility, an upset occurred resulting in SCCT1 (EQT 0034) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 55.74 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT1 (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.
EQT 0034	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	4/22/22	6:00 PM	4/22/22	7:00 PM	1	While commissioning the liquefaction facility, an upset occurred, resulting in SCCT1 (EQT 0034) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 58.42 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT1 (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.
EQT 0034	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	6/3/22	5:00 AM	6/3/22	6:00 AM	1	While commissioning the liquefaction facility, an upset occurred, resulting in SCCT1 (EQT 0034) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 42.17 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT1 (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.
EQT 0034	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	6/29/22	10:00 AM	6/29/22	11:00 AM	1	While commissioning the liquefaction facility, an upset occurred, resulting in SCCT1 (EQT 0034) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 53.75 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT1 (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.



		Deviation Summary Report		
Title V Permit Number:	0560-00987-V4	Company Name: VENTURE GLOBAL CALCASIE	U PASS, LLC	
cility Name:	CALCASIEU PASS PROJECT	AI Number:	194203	

Facility Name			CALCASIEU PASS PROJECT				A	I Number:			194203	
Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring		on Began		tion Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
EQT 0034	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	Date 6/30/22	2:00 AM	6/30/22	3:00 AM	I	While commissioning the liquefaction facility, an upset occurred, resulting in SCCT1 (EQT 0034) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 64.69 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT1 (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.
EQT 0034	VOC	SR 111	Comply with the requirements of PSD-LA-805 (M-4). This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-805 (M-4).	Records Review	Continuously	3/22/22	12:00 PM	5/26/22	9:00 AM	76 (intermittently)	Based on further review of fuel flow rates and high heating values, the VOC emissions exceeded the permit limit.  Estimated VOC 3-hour average: 2.01 lb/hr - 2.15 lb/hr	Calcasieu Pass is reporting these exceedances based on its review of monitoring data. As described by letter dated October 4, 2022 (EDMS Document ID 13511174), as of July 16, 2022, SCCT1 (EQT 0034 is no longer operational. The turbine has been converted to the currently permitted, permanent combined cycle operating mode.
EQT 0034	VOC and HAPs/TAPs	TO STATE OF THE ST	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/3/22	1:00 PM	5/26/22	9:00 AM	82 (intermittently)	Based on further review of fuel flow rates and high heating values, the VOC emissions exceeded the permit limit.  Estimated VOC max. pounds per hour: 2.01 lb/hr - 2.24 lb/hr	Calcasieu Pass is reporting these exceedances based on its review of monitoring data. As described by letter dated October 4, 2022 (EDMS Document ID 13511174), as of July 16, 2022, SCCT1 (EQT 0034 is no longer operational. The turbine has been converted to the currently permitted, permanent combined cycle operating mode.
EQT 0035	NOx		Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/18/22	3:00 AM	3/18/22	4:00 AM	1	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in SCCT2 (EQT 0035) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 51.92 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT2 (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.
EQT 0035	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/29/22	10:00 PM	3/29/22	12:00 PM	2	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in SCCT2 (EQT 0035) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 46.95 lb/hr and 115.98 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT2 (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.
EQT 0035	NOx	Commence of the Commence of th	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC 33:III.537]	Records Review	Continuously	3/30/22	1:00 PM	3/30/22	2:00 PM	1	While commissioning the liquefaction facility, an upset occurred due to instrumentation failure, resulting in SCCT2 (EQT 0035) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 76.53 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT2 (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.



Title V Permit Number: 0560-00987-V4 Company Name: VENTURE GLOBAL CALCASIEU PASS, LLC

AL Number: 194203

Facility Name:			CALCASIEU PASS PROJECT				A	I Number:			194203	
Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviati	on Began	Devia	tion Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
				Compliance Status	Frequency	Date	Time	Date	Time			
EQT 0035	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	4/5/22	10:00 AM	4/5/22	11:00 PM	1	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in SCCT2 (EQT 0035) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 69.72 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT2 (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.
EQT 0035	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	4/9/22	12:00 AM	4/9/22	2:00 AM	2	While commissioning the liquefaction facility, an upset occurred due to instrumentation failure, resulting in SCCT2 (EQT 0035) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 70.07 lb/hr and 302.74 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT2 (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.
EQT 0035	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	4/10/22	5:00 AM	4/10/22	8:00 PM	3	While commissioning the liquefaction facility, an upset occurred, resulting in a reduction in power and SCCT2 (EQT 0035) dropping below MECL.  Estimated NOx max. pounds per hour: 117.91 lb/hr, 202.20 lb/hr, and 241.37 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT2 (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.
EQT 0035	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	4/12/22	7:00 AM	4/12/22	9:00 AM	2	While commissioning the liquefaction facility, an upset occurred due to a failed communication card, resulting in SCCT 2 (EQT 0035) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 332.60 lb/hr and 94.02 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT2 (EQT 0035) was returned to emissions compliance and the faulty component was replaced. 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.
EQT 0035	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	4/28/22	12:00 AM	4/28/22	1:00 AM	1	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in SCCT2 (EQT 0035) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 55.43 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT2 (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.



		Deviation Summary Report	
Title V Permit Number:	0560-00987-V4	Company Name: VENTURE GLOBAL CALCASIEU PASS, LLC	
		10/202	

Facility Name	:		CALCASIEU PASS PROJECT				A	I Number:			194203	
Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviati	on Began	Devia	tion Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
		- tumber		Compliance Status	Frequency	Date	Time	Date	Time			
EQT 0035	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	5/9/22	9:00 AM	5/9/22	10:00 AM	1	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in SCCT2 (EQT 0035) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 56.57 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT2 (EQT 0035) was returned to emissions compliance. The EMS becam available in November 2022 and will minimize trips of the turbines and will ensure the turbines operate within MECL and within premix operating mode.
EQT 0035	со	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	5/6/22	2:00 PM	5/6/22	3:00 PM	1	While commissioning the liquefaction facility, an upset occurred and tripped SCCT2 (EQT 0035).  Estimated CO max. pounds per hour: 67.94 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT2 (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.
EQT 0035	со	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	5/6/22	7:00 PM	5/6/22	8:00 PM	1	While commissioning the liquefaction facility, an upset occurred and tripped SCCT2 (EQT 0035).  Estimated CO max. pounds per hour: 109.86 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT2 (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.
EQT 0035	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	5/7/22	12:00 AM	5/7/22	2:00 AM	2	While commissioning the liquefaction facility, an upset occurred and tripped SCCT1 (EQT 0034), SCCT2 (EQT 0035), and SCCT3 (EQT 0036), followed by power outage (blackout).  Estimated NOx max. pounds per hour: 164.48 lb/hr and 242.91 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT2 (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.
EQT 0035	VOC	SR 111	Comply with the requirements of PSD-LA-805 (M-4). This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-805 (M-4).	Records Review	Continuously	3/26/22	11:00 AM	5/26/22	9:00 AM		Based on further review of fuel flow rates and high heating values, the VOC emissions exceeded the permit limit.  Estimated VOC 3-hour average: 2.01 lb/hr - 2.04 lb/hr	Calcasieu Pass is reporting these exceedances based on its review of monitoring data. As described by letter dated October 4, 2022 (EDMS Document ID 13511174), as of August 6, 2022, SCCT2 (EQT 0035) is no longer operational. The turbine has been converted to the currently permitted, permanent combined cycle operating mode.



Deviation Summary Report

Title V Permit Number: 0560-00987-V4

Company Name: VENTURE GLOBAL CALCASIEU PASS, LLC

Facility Name	是 <sup>1</sup>						A	Al Number:			194203	
Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviati	on Began	Devia	tion Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
		Number		Compliance Status	Frequency	Date	Time	Date	Time			
EQT 0035	VOC and HAPs/TAPs	Control of the Control	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/26/22	10:00 AM	5/26/22	9:00 AM	21 (intermittently)	Based on further review of fuel flow rates and high heating values, the VOC emissions exceeded the permit limit.  Estimated VOC max. pounds per hour: 2.01 lb/hr - 2.14 lb/hr	Calcasieu Pass is reporting these exceedances based on its review of monitoring data. As described by letter dated October 4, 2022 (EDMS Document ID 13511174), as of August 6, 2022, SCCT2 (EQT 0035) is no longer operational. The turbine has been converted to the currently permitted, permanent combined cycle operating mode.
EQT 0036	voc		Comply with the requirements of PSD-LA-805 (M-4). This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-805 (M-4).	Records Review	Continuously	3/24/22	10:00 AM	4/29/22	12:00 PM	99 (intermittently)	Based on further review of fuel flow rates and high heating values, the VOC emissions exceeded the permit limit.  Estimated VOC 3-hour average: 2.01 lb/hr - 2.21 lb/hr	Calcasieu Pass is reporting these exceedances based on its review of monitoring data. As described by letter dated October 4, 2022 (EDMS Document ID 13511174), as of August 29, 2022, SCCT3 (EQT 0036) is no longer operational. The turbine has been converted to the currently permitted, permanent combined cycle operating mode.
EQT 0036	VOC and HAPs/TAPs		Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/24/22	9:00 AM	5/7/22	10:00 AM	100 (intermittently)	Based on further review of fuel flow rates and high heating values, the VOC emissions exceeded the permit limit.  Estimated VOC max. pounds per hour: 2.01 lb/hr - 2.27 lb/hr	Calcasieu Pass is reporting these exceedances based on its review of monitoring data. As described by letter dated October 4, 2022 (EDMS Document ID 13511174), as of August 29, 2022, SCCT3 (EQT 0036) is no longer operational. The turbine has been converted to the currently permitted, permanent combined cycle operating mode.
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/7/22	1:00 AM	3/7/22	3:00 AM	2	While commissioning the liquefaction facility, an upset occurred due to an instrumentation trip, resulting in SCCT3 (EQT 0036) going into full speed no load (FSNL) operating mode.  Estimated NOx max. pounds per hour: 51.3 lb/hr and 101.11 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (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.
EQT 0036	NOx	PARAMETRICAL V. TACABLE CARD.	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/7/22	1:00 PM	3/7/22	3:00 PM		While commissioning the liquefaction facility, an upset occurred due to an instrumentation trip, resulting in SCCT3 (EQT 0036) going into full speed no load (FSNL) operating mode.  Estimated NOx max. pounds per hour: 132.29 lb/hr and 173.96 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (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.



						Deviati	on Summ	ary Repo	rt			
Title V Per	mit Number:		0560-00987-V4			Comp	any Name:	VENTUR	E GLOBAL C	CALCASIEU PA	ASS, LLC	
Facility Name:			CALCASIEU PASS PROJECT				A	I Number:			194203	
Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring		on Began		tion Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Assistance Taken
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/11/22	12:00 PM	3/11/22	3:00 PM	3	While commissioning the facility, an upset occurred due to an instrumentation trip, resulting in SCCT3 (EQT 0036) dropping below MECL.  Estimated NOx max. pounds per hour: 326.83 lb/hr, 333.13 lb/hr, and 77.77 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (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.
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/15/22	11:00 AM	3/15/22	12:00 PM	1	While commissioning the liquefaction facility, an upset occurred that caused SCCT2 (EQT 0035) to trip, resulting in SCCT3 (EQT 0036) going into full speed no load (FSNL) operating mode.  Estimated NOx max. pounds per hour: 52.81 lb/hr	Before he facility's Energy Management of them (EMS) was common to the total had to be manually adjusted and SCCT3 (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.
EQT 0036	со		Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/15/22	10:00 AM	3/15/22	12:00 PM	2	While commissioning the liquefaction facility, an upset occurred that caused SCCT2 (EQT 0035) to trip, resulting in SCCT3 (EQT 0036) going into full speed no load (FSNL) operating mode.  Estimated CO max. pounds per hour: 55.34 lb/hr and 65.74 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (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.
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/17/22	8:00 AM	3/17/22	9:00 AM	1	While commissioning the liquefaction facility, an upset occurred due to an equipment failure, resulting in SCCT3 (EQT 0036) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 194.24 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (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.
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/18/22	3:00 AM	3/18/22	4:00 AM	1	While commissioning the liquefaction facility, a process unit tripped, resulting in SCCT3 (EQT 0036) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 116.56 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (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.



		Deviation Summary Report	
Title V Permit Number:	0560-00987-V4	Company Name: VENTURE GLOBAL CALCASIEU PASS, LLC	

Facility Name	lity Name: CALCASIEU PASS PROJECT				Al Number:						194203	
Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviati	on Began	Devia	tion Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
				Compliance Status	Frequency	Date	Time	Date	Time			
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/22/22	12:00 AM	3/22/22	2:00 AM	2	While commissioning the liquefaction facility, an upset occurred due to an instrumentation failure, resulting in SCCT3 (EQT 0036) dropping below MECL.  Estimated NOx max. pounds per hour: 121.68 lb/hr and 136.49 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (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.
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/22/22	9:00 AM	3/22/22	11:00 AM	2	While commissioning the liquefaction facility, an upset occurred, resulting in SCCT3 (EQT 0036) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 167.15 lb/hr and 157.33 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (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.
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/29/22	11:00 PM	3/29/22	12:00 AM	1	While commissioning the liquefaction facility, an instrumentation failure occurred, resulting in SCCT3 (EQT 0036) dropping below MECL.  Estimated NOx max. pounds per hour: 181.88 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (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.
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	4/3/22	3:00 PM	4/3/22	4:00 PM	1	While commissioning the liquefaction facility, an upset occurred, resulting in SCCT3 (EQT 0036) dropping below MECL.  Estimated NOx max. pounds per hour: 148.90 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (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.
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	4/4/22	8:00 AM	4/4/22	9:00 AM	1	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in SCCT3 (EQT 0036) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 57.02 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (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.



Deviation Summary Report

Title V Permit Number: 0560-00987-V4

Company Name: VENTURE GLOBAL CALCASIEU PASS, LLC

Facility Name			CALCASIEU PASS PROJECT				A	I Number:			194203	
Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviati	on Began	Devia	ion Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
				Compliance Status	Frequency	Date	Time	Date	Time			
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	4/5/22	10:00 AM	4/5/22	12:00 PM	2	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in SCCT3 (EQT 0036) dropping into extended lean-lean mode.  Estimated NOx max. pounds per hour: 95.27 lb/hr and 103.57 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (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.
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	4/10/22	5:00 AM	4/10/22	8:00 AM	3	While commissioning the liquefaction facility, an upset occurred, resulting in a reduction in power and SCCT3 (EQT 0036) dropping below MECL.  Estimated NOx max. pounds per hour: 116.58 lb/hr, 355.72 lb/hr, and 49.29 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (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.
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	4/12/22	7:00 AM	4/12/22	9:00 AM	2	While commissioning the liquefaction facility, an upset occurred due to a failed communication card, resulting in SCCT3 (EQT 0036) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 291.42 lb/hr and 177.95 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (EQT 0036) was returned to emissions compliance and the faulty component was replaced. 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.
EQT 0036	NOx	A STATE OF THE STA	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	4/22/22	6:00 PM	4/22/22	7:00 PM	1	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in SCCT3 (EQT 0036) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 58.29 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (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.
EQT 0036	NOx	The state of the s	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	6/2/22	10:00 PM	6/2/22	11:00 PM	1	While commissioning the liquefaction facility, an upset occurred, resulting in SCCT3 (EQT 0036) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 124.43 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (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.

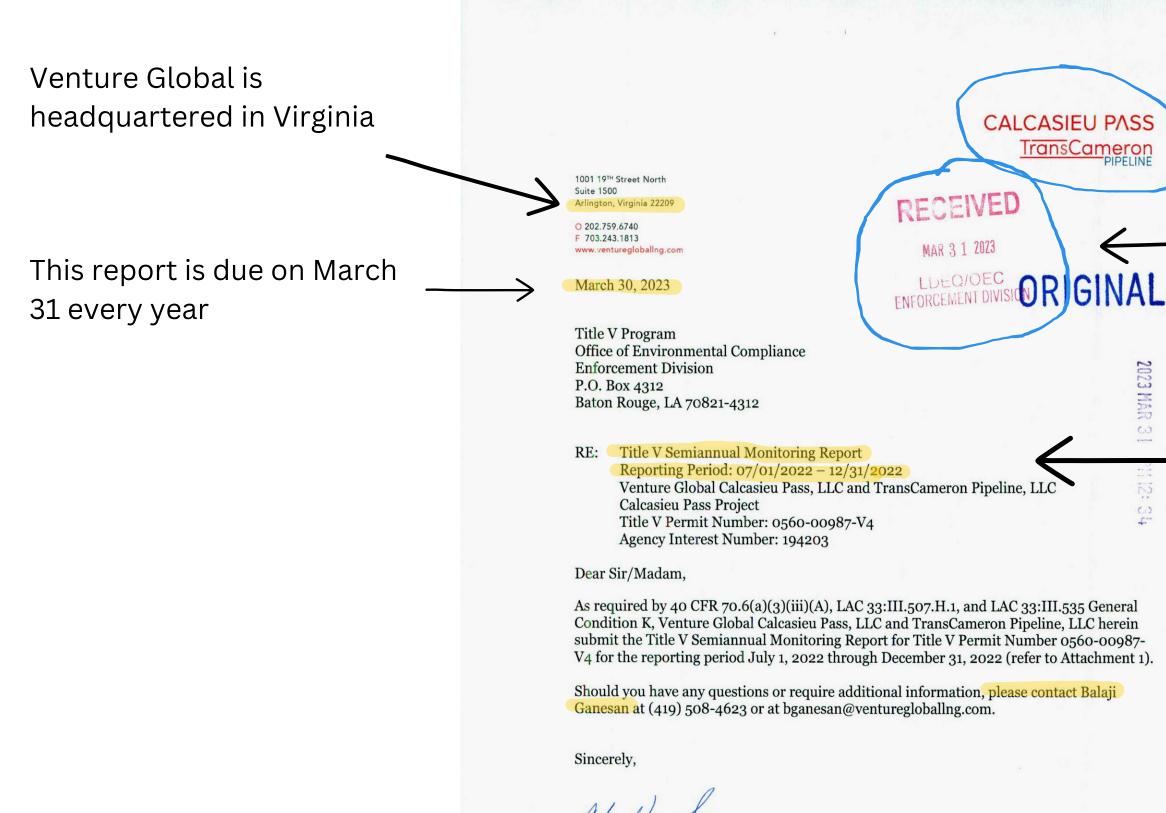


Title V Per	mit Number:		0560-00987-V4				ion Summ any Name:			CALCASIEU P.	ASS, LLC	
Facility Name			CALCASIEU PASS PROJECT				A	I Number:			194203	
Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviati	on Began	Devia	tion Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
				Compliance Status	Frequency	Date	Time	Date	Time			
EQT 0036	NOx		Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	6/3/22	2:00 AM	6/3/22	3:00 AM	1	While commissioning the liquefaction facility, an upset occurred, resulting in SCCT3 (EQT 0036) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 128.77 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (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.
EQT 0051	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/10/22	6:00 AM	3/10/22	10:00 AM	4	After a cold startup, the ASCCT (EQT 0051) experienced an emissions exceedance.  Estimated NOx max. pounds per hour: 4.39 lb/hr - 2.81 lb/hr	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 ASCCT (EQT 0051) to emissions compliance.
EQT 0051	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/12/22	8:00 AM	3/12/22	10:00 AM	2	Due to an equipment upset, the fuel gas operating temperature decreased, which changed the operating mode of ASCCT (EQT 0051).  Estimated NOx max. pounds per hour: 8.98 lb/hr and 11.94 lb/hr	The fuel gas heater was reset and used to raise the fuel gas temperature, and ASCCT (EQT 0051) was returned to emissions compliance.
EQT 0051	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	3/13/22	10:00 AM	3/12/22	11:00 AM	1	Due to cold weather, an adjustment to the glycol system changed the operating mode of ASCCT (EQT 0051).  Estimated NOx max. pounds per hour: 2.78 lb/hr	The glycol system was re-adjusted and ASCCT (EQT 0051) was returned to emissions compliance.

# Venture Global Calcasieu Pass LNG:

# 2nd Semiannual Monitoring Report Annotated Copy (07/01-12/31/2022)

Annotations on pages 2; 5-13 Original version can be found <u>here</u>



AKA - Venture Global

Not uploaded on LDEQ public database until April 28

Two of these reports must be submitted every year, on Sept. 30th and March 31st

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This person is based in Houston

Andy Vaughan

Vice President, Operations

Venture Global Calcasieu Pass, LLC &

TransCameron Pipeline, LLC

Attachment

# ATTACHMENT 1

Title V Semiannual Monitoring Report (07/01/2022 - 12/31/2022)



# (Facility Identification)

Applicable Reporting Period:

7/1/22	to	12/31/22
nm/dd/yy		mm/dd/yy

	C	ompany and Facil	ity Identification	1									
Permit Number	0560-00987-V4 Parish CAMERON Date Permit Issued												
Company Name	VENTURE GLOBAL	CALCASIEU	PASS, LLC										
Facility Name	CALCASIEU PASS	CALCASIEU PASS PROJECT Agency Interest Number 194203											
Mailing Address	516 Davis Road												
City	Cameron	State	LA	Zip Code	70631								
Contact Person	Balaji Ganesan	Phone #	419-508-4623	Fax#									
Principal Facility Product/Business	LNG												

I certify, based on information and belie document are true, accurate, and compl		he statements a	nd information in thi
Responsible Official (signature)	Conty Chapter	_	
Responsible Official (typed)	Andy Vaughan	Date	29-MAR-202
Responsible Official Title	Vice President, Operations	s	

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LDEQ/OEU ENFORCEMENT DIVISION



De Title V Permit Number: 0560-00987-V4	viation Reporting	: VENTURE GLOBAL CALCASIEU PASS, LLC
Facility Name: CALCASIEU PASS PROJE		Al Number: 194203
Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	Yes	Unauthorized Discharge Written Report; Dated July 27, 2022 (EDMS Doc ID: 13462522)

Only one of sixty-four violations in this report were reported at the time of its occurence to Louisiana Department of Environmental Quality

<sup>\*</sup> As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in the "Deviation Summary Report."



# 6 accidents on this page

#### Louisiana DEQ Title V Semiannual Monitoring Form

#### **Deviation Summary Report** VENTURE GLOBAL CALCASIEU PASS, LLC **Title V Permit Number:** Company Name: 0560-00987-V4 **CALCASIEU PASS PROJECT** 194203 **Facility Name:** AI Number: Method(s) or Other Permit **Deviation Ended** Permit **Deviation Began** Required Total No. of **Emission Source Applicable Compliance Requirement** Means For Pollutant(s) Deviation/ Cause(s) of Deviation Corrective Action(s) Taken Condition (Include Rule Citation) No./ Identifier Determining Monitoring Hours Number Compliance Status Frequency Date Time Date Time While commissioning the liquefaction facility, a liquefaction train tripped, resulting in CCCT1 (EQT 0001) dropping into Operators performed a high load transfer of Operate the source in accordance with the terms and extended lean-lean operating mode. 11/10/22 12:00 PM 11/10/22 2:00 PM CCCT1 (EQT 0001) and restored the turbine into EQT 0001 NOx Records Review Continuously conditions of this permit. [LAC 33:III.501.C.4] premix operating mode. Estimated NOx max. pounds per hour: 147.71 lb/hr and 96.21 lb/hr High level in cold flare knockout drum tripped all 18 liquefaction trains causing both steam turbines to trip, resulting in CCCT1 (EQT 0001) tripping and dropping below Operators restored CCCT1 (EQT 0001) to Operate the source in accordance with the terms and EQT 0001 12:00 PM 3:00 PM NOx Records Review 11/16/22 11/16/22 Continuously conditions of this permit. [LAC 33:III.501.C.4] Estimated NOx max. pounds per hour: 70.54 lb/hr, 74.72 lb/hr, and 95.72 lb/hr An extended startup following a facility blackout resulted in CCCT1 (EQT 0001) dropping below MECL. Operators restored CCCT1 (EQT 0001) to Operate the source in accordance with the terms and 2:00 PM EQT 0001 Records Review 11/17/22 9:00 AM 11/17/22 NOx Continuously conditions of this permit. [LAC 33:III.501.C.4] Estimated NOx max. pounds per hour: 105.39 lb/hr - 257.24 An extended startup following a facility blackout resulted in Comply with the requirements of PSD-LA-805 (M-4). CCCT1 (EQT 0001) dropping below MECL. Operators restored CCCT1 (EQT 0001) to This permit includes provisions of the Prevention of 2:00 PM EQT 0001 11/17/22 NOx Records Review Continuously 11/17/22 9:00 AM Significant Deterioration (PSD) review from Permit PSD-LA-805 (M-4). Estimated 10-hr avg. NOx pounds per hour: 94.66 lb/hr The black start of the facility after a freeze event resulted in Operate the source in accordance with the terms and CCCT1 (EQT 0001) dropping below MECL. Operators restored CCCT1 (EQT 0001) to EQT 0001 12/28/22 12/28/22 1:00 AM NOx Records Review Continuously 12:00 AM onditions of this permit. [LAC 33:III.501.C.4] Estimated NOx max. pounds per hour: 104.45 lb/hr High level in cold flare knockout drum tripped all 18 liquefaction trains causing both steam turbines to trip, resulting in CCCT2 (EQT 0002) tripping and dropping below Operate the source in accordance with the terms and Operators restored CCCT2 (EQT 0002) to EQT 0002 NOx 11/15/22 10:00 PM 11/16/22 10:00 AM 12 Records Review Continuously conditions of this permit. [LAC 33:III.501.C.4] MECL. Estimated NOx max. pounds per hour: 27.48 lb/hr - 111.11

What happened to the power source?

There are twelve pages of accidents in this report



Cutting and pasting answers violates the intent of the law: to understand and correct the root cause of the problem

					Devi	ation S	ummar	y Repo	rt			
Title V Permi	t Number:		0560-00987-V4			Compa	ny Name:		VEN	TURE GLO	BAL CALCASIEU PASS, LLC	
Facility Name:		CAL	CASIEU PASS PROJECT				AI	Number			194203	
No / Identifier Pollutant(s) Co		Permit Condition	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Means For Required	Deviation	on Began	Deviation Ended		Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Act on(s) Taken
.vos ruemer		Number	(Manual Number)	Compliance Status	Frequency	Date	Time	Date	Time			
EQT 0002	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	12/27/22	12:00 AM	12/28/22	1:00 AM	25	During the extreme weather conditions (freeze event), blackout, and the black start of the facility, CCCT2 (EQT 0002) tripped, resulting in the turbine dropping into extended lean-lean operating mode and experiencing instrumentation issues.  Estimated NOx max. pounds per hour: 109.27 lb/hr - 333.87 lb/hr	Operators restored CCC (LEQT 0002) to MECL as soon as practical after the extreme weather event had passed and instrumentation issues were resolved
EQT 0003	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	11/10/22	10:00 AM	11/10/22	2:00 PM	4	A process upset, resulting in CCCT3 (EQT 0003) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 28.06 lb/hr - 126.62 lb/hr.	Operators restored CCCT3 (EQT 0003) to MECL.
EQT 0003	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	11/15/22	10:00 PM	11/16/22	5:00 AM	7	High level in cold flare knockout drum tripped all 18 liquefaction trains causing both steam turbines to trip, resulting in CCCT3 (EQT 0003) tripping and dropping below MECL.  Estimated NOx max. pounds per hour: 49.17 lb/hr - 63.44	Operators restored CCCT3 (EQT 0003) to MECL.
EQT 0003	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	12/3/22	11:00 PM	12/4/22	1:00 AM	2	lb/hr  A process upset, resulting in CCCT3 (EQT 0003) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 40.63 lb/hr and 42.24 lb/hr.	Operators restored CCCT3 (EQT 0003) to MECL.
EQT 0004	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	8/26/22	2:00 PM	8/26/22	6:00 PM	4	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in CCCT4 (EQT 0004) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 64.20 lb/hr - 79.91 lb/hr	Before the facility's Energy Management Syste (EMS) was commissioned, turbine loads had to be manually adjusted and CCCT4 (EQT 0004) was returned to emissions compliance. The EM became available in November 2022 and will minimize trips of the turbines and will ensure to turbines operate within MECL and within presoperating mode.



					Devi	ation S	ummar	y Repo	rt			
Title V Permi	it Number:		0560-00987-V4			Compa	ny Name:		VEN	TURE GLO	BAL CALCASIEU PASS, LLC	
Facility Name:		CAL	CASIEU PASS PROJECT	_			Al	Number			194203	
Emission Source No./ Identifier	Pollutant(s)		Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviation	on Began	Deviatio	n Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
		Number		Compliance Status	Frequency	Date	Time	Date	Time			
EQT 0004	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	9/2/22	12:00 AM	9/2/22	7:00 AM	7	The facility experienced a blackout, resulting in CCCT4 (EQT 0004) dropping below MECL.  Estimated NOx max. pounds per hour: 52.89 lb/hr - 197.97 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and CCCT4 (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.
EQT 0004	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	9/14/22	5:00 PM	9/14/22	6:00 PM	1	While commissioning the liquefaction facility, an upset occurred, resulting in CCCT4 (EQT 0004) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 125.41 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and CCCT4 (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.
EQT 0004	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	11/15/22	10:00 PM	11/16/22	10:00 AM	11	High level in cold flare knockout drum tripped all 18 liquefaction trains causing both steam turbines to trip, resulting in CCCT4 (EQT 0004) tripping and dropping below MECL.  Estimated NOx max. pounds per hour: 19.37 lb/hr - 138.82 lb/hr	Operators restored CCCT4 (EQT 0004) to MECL.
EQT 0005	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	8/24/22	3:00 AM	8/24/22	5:00 AM	2	while commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in CCCT5 (EQT 0005) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 32.15 lb/hr and	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and CCCT5 (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.

Additional November accidents are listed on p.12

This 1 phrase is cut and pasted 25 times



Why did they begin operations without an Energy Management System?

					Devi	ation S	ummar	y Repo	rt			
Title V Perm	it Number:		0560-00987-V4			Compa	ny Name		VEN	TURE GLO	BAL CALCASIEU PASS, LLC	
Facility Name	:	CAI	CASIEU PASS PROJECT	_			Al	Number	:		194203	
Emission Source No./ Identifier	Pollutant(s)	Permit Condition	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviation	on Began	Deviatio	n Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
		Number		Compliance Status	Frequency	Date	Time	Date	Time			V
EQT 0005	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	8/26/22	7:00 PM	8/26/22	9:00 PM	2	While commissioning the liquefaction facility, a liquefaction train tripped, resulting in CCCT5 (EQT 0005) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 87.92 lb/hr and 25.34 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and CCCT5 (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.
EQT 0005	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	9/2/22	4:00 AM	9/2/22	7:00 AM	3	The facility experienced a blackout, resulting in CCCT5 (EQT 0005) dropping below MECL.  Estimated NOx max. pounds per hour: 20.08 lb/hr - 51.25 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and CCCT5 (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.
EQT 0005	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	9/14/22	5:00 PM	9/14/22	6:00 PM	1	While commissioning the liquefaction facility, an upset occurred due to equipment tripping, resulting in CCCT5 (EQT 0005) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 20.42 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and CCCT5 (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.
EQT 0005	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	12/10/22	8:00 PM	12/10/22	10:00 PM	2	Equipment malfuntion, resulting in CCCT5 (EQT0005) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 57.75 lb/hr and 35.35 lb/hr	Operators performed a high load transfer of CCCT5 (EQT 0005) to restore the turbine into premix operating mode.
EQT 0005	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	12/15/22	6:00 AM	12/20/22	7:00 PM	5 (intermittently)	Equipment malfunction, resulting in CCCT5 (EQT0005) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 41.38 lb/hr - 74.01 lb/hr	Operators performed a high load transfer of CCCT5 (EQT 0005) to restore the turbine into premix operating mode.



# **Deviation Summary Report**

Title V Permit Number:	0560-00987-V4	Company Name:	VENTURE GLOBAL CALCASIEU PASS, LLC

Facility Name:	CALCASIEU PASS PROJECT	AI Number:	194203	

Emission Source No./ Identifier	Pollutant(s)	Permit Condition	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviatio	n Began	Deviatio	n Ended	Total No. of	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
1.03 fuchalier		Number	(Include Nati Charlott)	Compliance Status	Frequency	Date	Time	Date	Time	110413		
EQT 0005	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	12/21/22	3:00 PM	12/21/22	10:00 PM	4 (intermittently)	A process upset occurred, resulting in CCCT5 (EQT0005) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 18.49 lb/hr - 187.11 lb/hr	Operators performed a high load transfer of CCCT5 (EQT 0005) to restore the turbine into premix operating mode.
EQT 0005	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	12/22/22	1:00 AM	12/22/22	5:00 AM	9 (intermittently)	A process upset occurred, resulting in CCCT5 (EQT0005) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 24.79 lb/hr - 187.11 lb/hr	Operators performed a high load transfer of CCCT5 (EQT 0005) to restore the turbine into premix operating mode.
EQT 0005	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	12/31/22	12:00 AM	12/31/22	2:00 PM	6 (intermittently)	During the extreme weather conditions (freeze event), blackout, and the black start of the facility, CCCT5 (EQT 0005) tripped, resulting in the turbine dropping into extended lean-lean operating mode and experiencing instrumentation issues.  Estimated NOx max. pounds per hour: 29.9 lb/hr - 197.89 lb/hr	Operators performed a high load transfer of CCCT5 (EQT 0005) to restore the turbine into premix operating mode; however, the turbine tripped frequently and was shutdown completely
EQT 0006	со	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	8/31/22	8:00 PM	11/22/22	10:00 AM	7 (intermittently)	Fuel flow rate higher than the current permit basis.  Estimate CO max. pounds per hour: 10.47 lb/hr - 10.76 lb/hr	Operators reduced fuel flow rate to restore HOH (EQT 0006) into emission compliance. Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit N 0560-00987-V4 to update the maximum hourly emission rate.
EQT 0006	РМ	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	8/31/22	8:00 PM	11/22/22	10:00 AM	5 (intermittently	Fuel flow rate higher than the current permit basis.  Estimated PM max. pounds per hour: 0.96 lb/hr - 0.97 lb/hr	Operators reduced fuel flow rate to restore HOH (EQT 0006) into emission compliance. Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No 0560-00987-V4 to update the maximum hourly emission rate.

Knowingly exceeding permits

Rather than solve the problem, they are asking for an emissions increase



# Two pages of the same accident and explanation

# Louisiana DEQ Title V Semiannual Monitoring Form

					Devi		ummar					
Title V Permi			0560-00987-V4			Compa	ny Name:			TURE GLOI	BAL CALCASIEU PASS, LLC	
Facility Name:		CAL	CASIEU PASS PROJECT				AI	Number			194203	
Emission Source No./ Identifier	Pollutant(s)		Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviatio	on Began	Deviatio	n Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action (s) Taken
		Number		Compliance Status	Frequency	Date	Time	Date	Time			V
EQT 0006	VOC and HAPs/TAPs	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	8/31/22	8:00 PM	11/22/22	10:00 AM	7 (intermittently)	Fuel flow rate higher than the current permit basis.  Estimated VOC max. pounds per hour: 0.69 lb/hr - 0.70 lb/hr	Operators reduced fuel flow rate to restore HOH (EQT 0006) into emission compliance. Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No 0560-00987-V4 to update the maximum hourly emission rate.
EQT 0007	со	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	9/1/22	7:00 AM	9/7/22	6:00 AM	3 (intermittently)	Fuel flow rate higher than the current permit basis.  Estimated CO max. pounds per hour: 10.44 lb/hr - 10.57 lb/hr	Operators reduced fuel flow rate to restore HOH2 (EQT 0007) into emission compliance. Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No 0560-00987-V4 to update the maximum hourly emission rate.
EQT 0007	РМ	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	9/1/22	7:00 AM	9/1/22	8:00 AM	1	Fuel flow rate higher than the current permit basis.  Estimated PM max. pounds per hour: 0.96 lb/hr	Operators reduced fuel flow rate to restore HOH2 (EQT 0007) into emission compliance. Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No 0560-00987-V4 to update the maximum hourly emission rate.
EQT 0007	VOC and HAPs/TAPs	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	9/1/22	7:00 AM	9/1/22	8:00 AM	1	Fuel flow rate higher than the current permit basis.  Estimated VOC max. pounds per hour: 0.69 lb/hr	Operators reduced fuel flow rate to restore HOH2 (EQT 0007) into emission compliance. Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No. 0560-00987-V4 to update the maximum hourly emission rate.
EQT 0008	СО	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	9/7/22	4:00 AM	12/16/22	6:00 PM	36 (intermittently)	Fuel flow rate higher than the current permit basis.  Estimated CO max. pounds per hour: 10.44 lb/hr - 12.60 lb/hr	Operators reduced fuel flow rate to restore HOH3 (EQT 0008) into emission compliance. Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No. 0560-00987-V4 to update the maximum hourly emission rate.



#### **Deviation Summary Report** Title V Permit Number: 0560-00987-V4 Company Name: VENTURE GLOBAL CALCASIEU PASS, LLC

Facility Name:		CAL	CASIEU PASS PROJECT				AI	Number			194203	
Emission Source No./ Identifier	Pollutant(s)	Permit Condition	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviation	on Began	Deviatio	n Ended	Total No. of	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
		Number	(100)	Compliance Status	Frequency	Date	Time	Date	Time			
EQT 0008	РМ	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	9/20/22	8:00 AM	12/16/22	6:00 PM	26 (intermittently)	Fuel flow rate higher than the current permit basis.  Estimated PM max. pounds per hour: 0.96 lb/hr - 1.14 lb/hr	Operators reduced fuel flow rate to restore HOH: (EQT 0008) into emission compliance. Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No 0560-00987-V4 to update the maximum hourly emission rate.
EQT 0008	VOC and HAPs/TAPs	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	9/7/22	8:00 AM	12/16/22	6:00 PM	32 (intermittently)	Fuel flow rate higher than the current permit basis.  Estimated VOC max. pounds per hour: 0.69 lb/hr - 0.92 lb/hr	Operators reduced fuel flow rate to restore HOH3 (EQT 0008) into emission compliance. Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No. 0560-00987-V4 to update the maximum hourly emission rate.
EQT 0009	со	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	9/5/22	9:00 AM	9/8/22	1:00 AM	40 (intermittently)	Fuel flow rate higher than the current permit basis.  Estimated CO max. pounds per hour: 10.44 lb/hr - 10.96 lb/hr	Operators reduced fuel flow rate to restore HOH4 (EQT 0009) into emission compliance. Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No. 0560-00987-V4 to update the maximum hourly emission rate.
EQT 0009	РМ	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	9/5/22	1:00 PM	9/7/22	10:00 AM	31 (intermittently)	Fuel flow rate higher than the current permit basis.  Estimated PM max. pounds per hour: 0.96 lb/hr - 0.99 lb/hr	Operators reduced fuel flow rate to restore HOH4 (EQT 0009) into emission compliance. Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No. 0560-00987-V4 to update the maximum hourly emission rate.
I H C C I DOOD	VOC and HAPs/TAPs	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	9/5/22	9:00 AM	9/7/22	11:00 AM	38 (intermittently)	Fuel flow rate higher than the current permit basis.  Estimated VOC max. pounds per hour: 0.69 lb/hr - 0.72 lb/hr	Operators reduced fuel flow rate to restore HOH4 (EQT 0009) into emission compliance. Additionally, on March 17, 2023 (EDMS Document ID 13730261), Calcasieu Pass submitted an application for the Renewal and Significant Modification of the Title V Permit No. 0560-00987-V4 to update the maximum hourly emission rate.



# **Deviation Summary Report**

Title V Permit Number: 0560-00987-V4 Company Name: VENTURE GLOBAL CALCASIEU PASS, LLC

Emission Source No./ Identifier	Pollutant(s)	Permit Condition	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring	Deviatio	on Began	Deviatio	n Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
		Number			Frequency	Date	Time	Date	Time			
EQT 0013 and EQT 0014	Visible Emissions	SRs 52 and 59	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 5 minutes during any two consecutive hours. [40 CFR 60.18(c)(1)]  Opacity<=20 percent, except for emissions that have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]	Review Method 9 Reports	Continuously	7/18/22	1:03 PM	7/18/22	2:42 PM	1.7	While commissioning the liquefaction facility, a power outage occurred, resulting in the flare blowers being inoperable, which resulted in visible emissions from the Warm Flare (EQT 0013) and Cold Flare (EQT 0014) which are airassisted.	Power was restored to the flare blowers.
EQT 0013 and EQT 0014	Visible Emissions	SRs 52 and 59	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 5 minutes during any two consecutive hours. [40 CFR 60.18(c)(1)]  Opacity<=20 percent, except for emissions that have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]	Review Method 9 Reports	Continuously	7/18/22	5:09 PM	7/18/22	6:00 PM	0.9	While commissioning the liquefaction facility, a power outage occurred, resulting in the flare blowers being inoperable, which resulted in visible emissions from the Warm Flare (EQT 0013) and Cold Flare (EQT 0014) which are airassisted.	Power was restored to the flare blowers.
EQT 0013 and EQT 0014	Visible Emissions	SRs 52 and 59	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 5 minutes during any two consecutive hours. [40 CFR 60.18(c)(1)]  Opacity<=20 percent, except for emissions that have an average opacity in excess of 20 percent for not more than one six-mmute period in any 60 consecutive minutes.  [LAC 33:III.1311.C]	Review Method 9 Reports	Continuously	7/19/22	12:07 PM	7/19/22	1:00 PM	0.9	While commissioning the liquefaction facility, a power outage occurred, resulting in the flare blowers being inoperable, which resulted in visible emissions from the Warm Flare (EQT 0013) and Cold Flare (EQT 0014) which are airassisted.	Power was restored to the flare blowers.
EQT 0034	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	7/1/22	1:00 PM	7/7/22	2:00 PM	1	While commissioning the liquefaction facility, a process upset occurred due to equipment tripping, resulting in SCCT1 (EQT 0034) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 60.63 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT1 (EQT 0034) was returned to emissions compliance.



# **Deviation Summary Report**

Title V Permit Number: 0560-00987-V4 Company Name: VENTURE GLOBAL CALCASIEU PASS, LLC

Emission Source No./ Identifier	Pollutant(s)	Permit Condition	on Applicable Compliance Requirement	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviation	on Began	Deviatio	n Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
No./ Identifier		Number		Compliance Status	Frequency	Date	Time	Date	Time	Hours		
EQT 0035	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	7/16/22	8:00 AM	7/16/22	9:00 AM	1	While commissioning the liquefaction facility, a process upset occurred due to equipment tripping, resulting in SCCT2 (EQT 0035) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 46.67 lb/hr	Before the facility's Energy Management Systen (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT2 (EQT 0035) was returned to emissions compliance.
EQT 0035	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	7/18/22	11:00 PM	7/18/22	12:00 AM	1	A process upset occurred due to equipment tripping, resulting in SCCT2 (EQT 0035) dropping into extended lean-lean operaiting mode.  Estimated NOx max. pounds per hour: 60.28 lb/hr	Before the facility's Energy Management Systen (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT2 (EQT 0035) was returned to emissions compliance.
EQT 0035	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	7/19/22	1:00 PM	7/18/22	4:00 PM	3	While starting up CCCT4 (EQT 0004), the entire plant tripped, resulting in the flame out of SCCT2 (EQT 0035).  Estimated NOx max. pounds per hour: 43.9 lb/hr, 72.75 lb/hr, and 78.25 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT2 (EQT 0035) was returned to emissions compliance.
EQT 0035	СО	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	7/19/22	2:00 PM	7/18/22	3:00 PM	1	While starting up CCCT4 (EQT 0004), the entire plant tripped, resulting in the flame out of SCCT2 (EQT 0035).  Estimated CO max. pounds per hour: 214.09 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT2 (EQT 0035) was returned to emissions compliance.
EQT 0036	VOC and HAPs/TAPs	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	7/20/22	1:00 PM	7/20/22	8:00 PM	4 (intermittently)	Based on further review of fuel flow rates and high heating values, the VOC emissions exceeded the permit limit.  Estimated VOC max. pounds per hour: 2.02 lb/hr - 2.22 lb/hr	Calcasieu Pass is reporting these exceedances based on its review of monitoring data. As described by letter dated October 4, 2022 (EDM: Document ID 13511174), as of August 29, 2022 SCCT3 (EQT 0036) is no longer operational. Th turbine has been converted to the currently permitted, permanent combined cycle operating mode.
EQT 0036	voc	SR 111	Comply with the requirements of PSD-LA-805 (M-4). This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD- LA-805 (M-4).	Records Review	Continuously	7/20/22	1:00 PM	7/20/22	3:00 PM	Ī	values, the VOC emissions exceeded the permit limit.	Calcasieu Pass is reporting these exceedances based on its review of monitoring data. As described by letter dated October 4, 2022 (EDMS Document ID 13511174), as of August 29, 2022 SCCT3 (EQT 0036) is no longer operational. The turbine has been converted to the currently permitted, permanent combined cycle operating mode.



# **Deviation Summary Report**

Title V Permit Number:	0560-00987-V4	Company Name:	VENTURE GLOBAL CALCASIEU PASS, LLC

Emission Source No./ Identifier	Pollutant(s)		on Applicable Compliance Requirement	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviation	on Began	Deviatio	n Ended	Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
		Number		Compliance Status	Frequency	Date	Time	Date	Time			
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	7/1/22	9:00 AM	7/1/22	10:00 AM	1	While commissioning the liquefaction facility, a process upset occurred due to equipment tripping, resulting in SCCT3 (EQT 0036) going into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 51.41 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (EQT 0036) was returned to emissions compliance.
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	7/8/22	4:00 PM	7/8/22	5:00 PM	1	While commissioning the liquefaction facility, a process upset occurred due to equipment tripping, resulting SCCT3 (EQT 0036) going into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 51.67 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (EQT 0036) was returned to emissions compliance.
EQT 0036	со	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	7/18/22	3:00 PM	7/18/22	4:00 PM	1	A process upset occurred due to equipment tripping, resulting in SCCT3 (EQT 0036) dropping into extended lean-lean operating mode.  Estimated CO max. pounds per hour: 70.09 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (EQT 0036) was returned to emissions compliance.
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	7/18/22	10:00 PM	7/18/22	12:00 AM	2	A process upset occurred due to equipment tripping, resulting in SCCT3 (EQT 0036) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 50.30 lb/hr - 58.63 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (EQT 0036) was returned to emissions compliance.
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	7/19/22	3:00 PM	7/19/22	4:00 PM	1		Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (EQT 0036) was returned to emissions compliance.
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	7/19/22	7:00 PM	7/19/22	8:00 PM	1	0036) 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 SCCT3 (EQT 0036) was returned to emissions compliance.
EQT 0036	NOx		Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	7/25/22	6:00 AM	7/25/22	7:00 AM	1	0036) 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 SCCT3 (EQT 0036) was returned to emissions compliance.



# **Deviation Summary Report**

Title V Permit Number: 0560-00987-V4 Company Name: VENTURE GLOBAL CALCASIEU PASS, LLC

Emission Source No./Identifier	Pollutant(s)	Permit Condition	Applicable Compliance Requirement	Method(s) or Other Means For Determining	Permit Required Monitoring	Deviation	on Began	Deviatio	n Ended	Total No. of	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken	
		Number		Compliance Status	Frequency	Date	Time	Date	Time				
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	7/25/22	6:00 AM	7/25/22	7:00 AM	1	While commissioning the liquefaction facility, a process upset occurred due to equipment tripping, resulting in SCCT3 (EQT 0036) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 94.61 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (EQT 0036) was returned to emissions compliance.	
EQT 0036	NOx	SK 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	8/17/22	10:00 AM	8/17/22	11:00 AM	1	While commissioning the liquefaction facility, a process upset occurred due to equipment tripping, resulting in SCCT3 (EQT 0036) dropping into extended lean-lean operating mode.  Estimated NOx max pounds per hour: 53.45 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (EQT 0036) was returned to emissions compliance.	
EQT 0036	NOx	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	8/26/22	9:00 AM	8/26/22	9:00 PM	8 (intermittently)	While commissioning the liquefaction facility, a process upset occurred due to equipment tripping, resulting in SCCT3 (EQT 0036) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 42.79 lb/hr - 243.08 lb/hr		
EQT 0036	со	SR 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	8/26/22	1:00 PM	8/26/22	2:00 PM	1	While commissioning the liquefaction facility, a process upset occurred due to equipment tripping, resulting in SCCT3 (EQT 0036) dropping into extended lean-lean operating mode.  Estimated CO max. pounds per hour: 120.50 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and SCCT3 (EQT 0036) was returned to emissions compliance.	
EQT 0036	NOx	CD 120	Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC33:III.537]	Records Review	Continuously	8/28/22	1:00 PM	8/28/22	3:00 PM	2	While commissioning the liquefaction facility, a process upset occurred due to equipment tripping, resulting in SCCT3 (EQT 0036) dropping into extended lean-lean operating mode.  Estimated NOx max. pounds per hour: 63.70 lb/hr and 67.67 lb/hr		
EQT 0051	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	10/27/22	11:00 AM	10/27/22	12:00 PM	1	A process upset occurred due to equipment tripping, resulting in ASCCT1 (EQT 0051) tripping.  Estimated NOx max. pounds per hour: 3.31 lb/hr	Before the facility's Energy Management System (EMS) was commissioned, turbine loads had to be manually adjusted and ASCCT1 (EQT 0051) was returned to emissions compliance.	



# **Deviation Summary Report**

Title V Permit Number: 0560-00987-V4 Company Name: VENTURE GLOBAL CALCASIEU PASS, LLC

Emission Source No./ Identifier	Pollutant(s)	Permit Condition		Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring	Deviation Began		Deviation Ended		Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
		Number	(include Rule Chandon)		Frequency	Date	Time	Date	Time			
EQT 0051	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	11/17/22	1:00 AM	11/17/22	11:00 AM	10	High level in cold flare knockout drum tripped all 18 liquefaction trains causing both steam turbines to trip, resulting in ASCCT1 (EQT 0051) tripping and dropping below MECL.  Estimated NOx max. pounds per hour: 11.84 lb/hr - 29.29	Operators restored ASCCT1 (EQT 0051) to MECL.
EQT 0051	NOx	SR 111	Comply with the requirements of PSD-LA-805 (M-4). This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-805 (M-4).	Records Review	Continuously	11/17/22	1:00 AM	11/17/22	11:00 AM	5	High level in cold flare knockout drum tripped all 18 liquefaction trains causing both steam turbines to trip, resulting in ASCCT1 (EQT 0051) tripping and dropping below MECL.  Estimated 2-hour avg. NOx pounds per hour: 22.03 lb/hr - 28.95 lb/hr	Operators restored ASCCT1 (EQT 0051) to MECL.
EQT 0051	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	12/22/22	8:00 AM	12/122/22	3:00 PM	3 (intermittently)	Combustion chamber inner staging valve position feedback failure, resulting in ASCCT1 (EQT 0051) operating in Dry-Low Emission (DLE) Mode.  Estimated NOx max. pounds per hour: 2.73 lb/hr - 5.17 lb/hr	Operators implemented corrective measures a ASCCT1 (EQT 0051) was returned to emissi compliance.
EQT 0051	NOx	SR 105	Operate the source in accordance with the terms and conditions of this permit. [LAC 33:III.501.C.4]	Records Review	Continuously	12/23/22	11:00 PM	12/27/22	3:00 AM	77	During the extreme weather conditions (freeze event), facility blackout, and the black start of the facility, ASCCT1 (EQT 0051) tripped multiple times and experienced instrumentation issues.  Estimated NOx max. pounds per hour: 2.76 lb/hr - 40.67 lb/hr	Operators restored ASCCT1 (EQT 0051) to MECL as soon as practical after the extreme weather event had passed and instrumentation issues caused by the extreme weather could b resolved.
EQT 0051	NOx	SR 111	Comply with the requirements of PSD-LA-805 (M-4). This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD- LA-805 (M-4).	Records Review	Continuously	12/23/22	11:00 PM	12/27/22	3:00 AM	28 (intermittently)	During the extreme weather conditions (freeze event), facility blackout, and the black start of the facility, ASCCT1 (EQT 0051) tripped multiple times and experienced instrumentation issues.  Estimated 2-hour avg. NOx pounds per hour: 15.8 lb/hr - 20.1 lb/hr	Operators restored ASCCT1 (EQT 0051) to MECL as soon as practical after the extreme weather event had passed and instrumentation issues caused by the extreme weather could b resolved.