

US EPA ARCHIVE DOCUMENT

From: [Andrew Chartrand](#)
To: [Wilson, Aimee](#)
Cc: David.Ayers@cheniere.com
Subject: RE: More questions on Corpus Christi Liquefaction
Date: Friday, May 24, 2013 3:17:44 PM
Attachments: [25744-100-M5-0019-00001 Rev 00A.pdf.pdf](#)
[25744-100-M5-0019-00002 Rev 00B.pdf.pdf](#)

Aimee,

Here are answers to all but one of the questions that you posed in this e-mail. We will provide an answer to the other unanswered question next week.

Comment: Are the thermal oxidizers traditional or regenerative?

Response: *The thermal oxidizers will be traditional.*

Comment: Are the wet and dry flares in one unit? I am not familiar with these. The way the application is worded they sound to be separate, but share an EPN. Please clarify. Also the January 2013 response on page 27 referred to attachment 4D for the wet and dry flare and attachment 4E for the marine flare. The copy I have does not have those attachments. Could you please provide those? They may help me understand the configuration and operation of the wet and dry flares.

Response: *Due to thermal radiation considerations and limited plot space, the two wet flares and two dry flares are located together in one structure. Attachments 4D and 4E are attached.*

Comment: Will the turbines ever combust natural gas in addition to the BOG?

Response: *During the initial start-up of the first LNG train, pipeline quality natural gas will be utilized to fire the gas turbines until such time as the LNG tanks are cooled down and boil-off gas (BOG) is available. Once BOG is available, all turbine operations, including restarts of the trains after maintenance turnaround, will utilize BOG.*

Comment: What is the HP rating of the generator engines and the firewater pump engines? Are these engines going to meet the Tier 2 or the Tier 3 requirements of 40 CFR Part 60 Subpart III?

Response: *The firewater pumps are rated at 422 hp and the standby generators are rated at 2,220 hp. The standby generators meet the Tier 2 requirements for engines greater than 560 kW (which is the most stringent standard listed in 40 CFR 89.112). The firewater pumps meet the Tier 3 requirements for engines between 225-450 kW.*

Comment: Fugitives – What is meant by a modified 28M LDAR program for methane service fugitives?

Response: *The 28M LDAR program will be modified to monitor for methane. 28LAER will be used on streams containing greater than 10% VOC and 28M will be used on all other streams containing methane.*

Andrew J. Chartrand
Cheniere Energy, Inc.
700 Milam St., Suite 800
Houston, TX 77002
Phone: (713) 375-5429
Fax: (713) 375-6429

Cell: (832) 358-5535

From: Wilson, Aimee [mailto:Wilson.Aimee@epa.gov]
Sent: Wednesday, May 08, 2013 3:07 PM
To: Andrew Chartrand
Subject: More questions on Corpus Christi Liquefaction

Andrew,

I finished up drafting the statement of basis for the Corpus Christi Liquefaction GHG permit today. Here are some more questions I have. I don't expect you to have answers to these for our meeting tomorrow, but wanted to go ahead and email them to you. I apologize if I have repeated some questions that I may have already asked.

Are the thermal oxidizers traditional or regenerative?

Are the wet and dry flares in one unit? I am not familiar with these. The way the application is worded they sound to be separate, but share an EPN. Please clarify. Also the January 2013 response on page 27 referred to attachment 4D for the wet and dry flare and attachment 4E for the marine flare. The copy I have does not have those attachments. Could you please provide those. They may help me understand the configuration and operation of the wet and dry flares.

Will the turbines ever combust natural gas in addition to the BOG?

What temperature will be maintained in the TO combustion chamber? What will the exhaust temperature be for the TO exhaust? The January response mentioned periodic testing. What frequency are you considering as periodic and what type of test will be performed?

What is the HP rating of the generator engines and the firewater pump engines? Are these engines going to meet the Tier 2 or the Tier 3 requirements of 40 CFR Part 60 Subpart III?

Fugitives – What is meant by a modified 28M LDAR program for methane service fugitives?

Thanks,
Aimee

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