

US EPA ARCHIVE DOCUMENT

- An overall reduction in total emissions of carbon dioxide (CO<sub>2</sub>), nitrous oxide (N<sub>2</sub>O) and carbon dioxide equivalents (CO<sub>2</sub>e) compared to the previous application information as follows:

**LIQUEFACTION PROJECT EMISSIONS COMPARISON – PREVIOUS PROJECT EMISSIONS VERSUS UPDATED PROJECT EMISSIONS**

Source	Annual Emissions (tpy)				
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	SF <sub>6</sub>	CO <sub>2</sub> e
Previous Project Emissions Total	1,579,155	43.39	1.30	0.017	1,580,866
Updated Project Emissions total	1,559,204	74.72	1.25	0.017	1,561,559

Freeport LNG is proposing to utilize essentially the same process description and process equipment, production rate, and type of air emission sources as previously identified in the initial GHG PSD application. However, the change in configuration of the Pretreatment Facility and the Liquefaction Plant has resulted in a change to the area map, site plans and location coordinates for proposed air emission sources.

In addition, a more detailed engineering design for the Pretreatment Facility has identified the need for the following emission sources at the Pretreatment Facility:

- Five heating medium heaters instead of ten;
- Two additional emergency engines;
- One additional emergency air compressor engine; and
- Addition of an emergency ground flare system in lieu of the elevated NGL Flare and Atmospheric Release Vent proposed in the previous application documentation.

Similarly for the Liquefaction Plant, more detailed engineering has identified the need for two additional emergency generator engines and one additional of emergency air compressor engine.

The proposed heating medium heaters and emergency engines will be similar in terms of the type of emission sources as those identified in the previous submittals to the EPA. A more detailed description of the proposed changes is attached.

We believe the evaluation of BACT as discussed in Section 10 of the initial permit application and follow-on information submitted to the EPA is applicable to the heating medium heaters, emergency generator and firewater pump engines proposed for the Pretreatment Facility and the Liquefaction Plant as these emission sources will be similar to the corresponding emission sources proposed in the initial application. Thus, the proposed changes should not alter the conclusions of the BACT evaluation for these emission sources.

I hope this updated information will allow you to continue and complete your review of the permit application. We will continue to coordinate with EPA staff and greatly appreciate your time and guidance on this effort.