



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

April 4, 2022

VIA EMAIL: mmoppert@cameronlng.com

Mr. Michael Moppert
Vice President, Operations
Cameron LNG, LLC
P.O. Box 439
Hackberry, LA 70645

Re: Clean Air Act Notice of Violation

Dear Mr. Moppert:

The United States Environmental Protection Agency (“EPA”) has identified the Cameron LNG, LLC (“Cameron”) facility as having violated the Clean Air Act (“CAA”) and the regulations promulgated thereunder. This Notice of Violation (“Notice”) is issued to Cameron for violations of the CAA, 42 U.S.C. § 7401 *et seq.*, at its Cameron LNG Facility located at 301 North Main St., Hackberry, Louisiana (“the Facility”). Specifically, EPA believes that Cameron¹ has violated its Title V Operating Permits and the Louisiana State Implementation Plan (“SIP”). The Notice is issued pursuant to Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1), which requires the Administrator of EPA to notify any person in violation of a SIP or permit of the violations. The authority to issue this Notice has been delegated to the Director of the Enforcement and Compliance Assurance Division, EPA Region 6.

On October 21, 2021, we sent Cameron a letter regarding our Emission Inventory Permit Consistency Review, in which we reviewed the Facility’s emission inventory for criteria pollutant and hazardous air pollutant (HAP) emission totals for calendar year 2019, as reported to the Louisiana Department of Environmental Quality (“LDEQ”). As noted in our letter, the Facility’s reported annual emission totals exceeded its permit authorization limits. Cameron responded via phone call and e-mail on November 8, 2021 and provided further information regarding the annual emission totals.

We are sending this letter to inform Cameron of violations at the Facility of Cameron’s Title V Operating Permits and Louisiana’s federally approved SIP.

¹ Please be advised that some companies may qualify as a “small business” under the Small Business Regulatory Enforcement and Fairness Act (SBREFA). The U.S. Small Business Administration has established a Table of Small Business Size Standards, which can be found at: https://www.sba.gov/sites/default/files/Size_Standards_Table.pdf. The SBREFA Information Sheet provides information on compliance assistance to entities that may qualify as small businesses as well as to inform them of their right to comment to the SBREFA Ombudsman concerning EPA enforcement activities. The SBREFA Information Sheet can be found at: <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100BYAV.PDF?Dockey=P100BYAV.PDF>.

CAA Violations

No stationary source subject to Title V may operate except in compliance with a Title V permit. *See* 42 U.S.C. § 7661a(a); 40 C.F.R. §§ 70.1(b) and 70.7(b); and L.A.C. 33: III.501.C.2 and C.4 and L.A.C. 33: III.507. B.2. Louisiana issues Title V permits pursuant to its federally authorized Title V air operating permit program. *See* 60 Fed. Reg. 47,296-97 (Sept. 12, 1995) (effective Oct. 12, 1995); 40 C.F.R. Part 70 Appendix A. Unless a term or condition is specifically designated as not being federally enforceable, all terms and conditions of a Title V operating permit are federally enforceable. 40 C.F.R. § 70.6(b). The federally enforceable Louisiana State Implementation Plan (SIP) further provides that regulated sources shall be operated in accordance with all terms and conditions of the source's permit and that noncompliance with any term or condition of the permit shall be grounds for enforcement action as per LAC 33: III.501. C.4.

At the time of the violations identified below, Cameron operated the Facility's SSM Emissions - Ground Flare pursuant to Title V Operating Permit No. 0560-00184-V10 and Variance Activity No. PER20190001.

Title V Operating Permit No. 0560-00184-V10 requires that Cameron limit its emissions of Sulfur Dioxide (SO₂) to 1.5 tons per year (tpy) at the Facility's SSM Emissions - Ground Flare (EQT 0084). Variance Activity No. PER20190001 requires that Cameron limit its SO₂ to 0.14 tons per variance period which is April 12, 2019, through April 5, 2020. Based on EPA's review, EPA finds that Cameron exceeded its variance limit approved in 2019. Specifically, Cameron reported 2.49 tons of SO₂ emissions as its actual variance emissions for the SSM Emissions – Ground Flare, which exceeded the variance permitted limit of 0.14 tons. By exceeding its permitted SO₂ limit, Cameron violated the emissions per variance period (tons) limit for SO₂ in Variance Activity No. PER20190001. This is also a violation of LAC 33: III.501. C.4.

Title V Operating Permit No. 0560-00184-V10, Specific Requirement 109, requires that Cameron comply with the Part 70 General Conditions in L.A.C. 33: III.535. General Condition R of LAC 33: III.535 requires a permittee to report permit deviations semiannually. Based on EPA's review, EPA finds that Cameron failed to timely report the above-referenced SO₂ exceedance for the SSM Emissions Ground Flare. By failing to timely report this total SO₂ exceedance as permit deviations, Cameron violated Specific Requirement 109 of Permit No. 0560-00184-V10, L.A.C. 33: III.535, General Condition R, and LAC 33: III.501. C.4.

Permit	Subject Item Type	Parameter	Title V + Variance Permitted Limit (tpy)	ERIC Reported Emissions (tpy)	Reported Emissions Over Permitted Limit (tpy)
0506-00184-V10	SSM Emissions – Ground Flare	Sulfur dioxide	1.64	3.99	2.35

LAC 33: III.919.B.1 of the Louisiana SIP, approved at 76 Fed. Reg. 38,977 (July 5, 2011), requires that Cameron submit an Annual Emissions Statement to LDEQ consisting of an inventory of the Facility's actual emissions and the permitted emissions limits of VOCs, NO_x, CO, SO₂, lead, PM₁₀ and PM_{2.5}, and ammonia. Actual emissions must be reported for all sources of emissions at the Facility, including

fugitive emissions, flash gas emissions, insignificant sources, and excess emissions occurring during maintenance, start-ups, shutdowns, upsets, and downtime.

Based on its review, EPA finds that Cameron violated LAC 33: III.919.B.1 of the Louisiana SIP by failing to report the Facility's actual emissions in the annual emissions inventory for VOC, NO_x, CO, SO₂, PM₁₀ and PM_{2.5} for reporting year 2019.

Opportunity to Confer

We appreciate Cameron working with us regarding this matter. Please contact Carlos Zequeira, Assistant Regional Counsel, Zequeira.C@epa.gov, (214) 665-8053, within ten (10) business days of receipt of this Notice to discuss an administrative path for quick resolution.

Sincerely,

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

ec: Angela Marse, Louisiana Department of Environmental Quality (angela.marse@la.gov)
Clayton Miller, Cameron LNG, LLC (cmiller@cameronlng.com)