



STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL SERVICES

Telephone: (337) 775-5718
Fax: (337) 775-5567
Email: tboynunez@gmail.com

Mr. Michael Fewell, President
Cameron Parish Police Jury
148 Smith Circle
Cameron, LA 70631

RE: Notification of a Public Hearing on a Proposed Initial Part 70 Air Operating Permit, an Initial Prevention of Significant Deterioration (PSD) Permit, and the Associated Environmental Assessment Statement (EAS) Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC / Sabine Pass LNG Terminal – Trains 7 – 9 AI 119267; Activity Numbers PER20250007 and PER20250008; and Permit Numbers 3184-V0 and PSD-LA-864 Cameron, Cameron Parish, Louisiana

Dear Mr. Fewell:

The Louisiana Department of Environmental Quality (LDEQ) is sending notification of a public hearing and requesting public comments regarding the permitting actions for **Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC / Sabine Pass LNG Terminal – Trains 7 – 9** located at **9243 Gulf Beach Highway, Cameron, in Cameron Parish.**

For your reference, attached is a copy of the public notice and PSD Permit associated with this permit action. The legal notice was published in/or announced on the LDEQ Webpage found at <http://www.deq.louisiana.gov/public-notice> on *Monday, May 11, 2026*.

Written comments on the permit may be submitted to Public Participation Group, LDEQ-OES, Public Participation & Permit Support Division, P.O. Box 4313, Baton Rouge, LA 70821-4313. All comments regarding the permit(s) should specify Agency Interest (AI) No. 232172 and Activity Numbers PER20250007 and PER20250008.

Should you have any questions, additional permit information may be obtained from Mr. Dan Nguyen, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3395, or email Dan.Nguyen@la.gov. Should you have any questions regarding the public hearing, please contact Beth Altazan, LDEQ, Public Participation & Permit Support Division, Permit Support Division, at (225) 219-3283 or email Beth.Altazan@la.gov.

Please complete the attached 'Verification by Parish Government' and mail to Beth Altazan, LDEQ-OES, Public Participation & Permit Support Division, PO Box 4313, Baton Rouge, LA 70821-4313, fax to (225) 325-8148, or email to Beth.Altazan@la.gov.

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3283 or email to Beth.Altazan@la.gov.

Sincerely,

Beth Altazan
Beth Altazan
Environmental Project Specialist III, Public Participation Group

5/11/2026
Date

BA
Attachments/

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
SABINE PASS LNG, LP AND SABINE PASS LIQUEFACTION, LLC
SABINE PASS LNG TERMINAL - TRAINS 7 - 9
PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENT
ON A PROPOSED INITIAL PART 70 AIR OPERATING PERMIT, AN INITIAL
PREVENTION OF SIGNIFICANT DETERIORATION (PSD) PERMIT,
& THE ASSOCIATED ENVIRONMENTAL ASSESSMENT STATEMENT (EAS)

The LDEQ, Office of Environmental Services, will conduct a public hearing to receive public comments on a Proposed Initial Part 70 Air Operating Permit, an Initial Prevention of Significant Deterioration (PSD) Permit, and the Associated Environmental Assessment Statement (EAS) for Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC, 9243 Gulf Beach Highway, Cameron, Louisiana 70631 for the Sabine Pass LNG Terminal - Trains 7 - 9. **The facility is located at 9243 Gulf Beach Highway, Cameron, in Cameron Parish.**

The hearing will be held on **Thursday, June 11, 2026, beginning at 6:00 p.m., at the Johnson Bayou Community Center, 5556 Gulf Beach Highway, Johnson Bayou, LA 70631.** During the hearing, all interested persons will have an opportunity to present oral statements, views, recommendations, opinions and information on the proposed permit. Additionally, written statements and other documents such as charts, data, and tabulations may be filed with the hearing officer at the hearing.

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC requested an Initial Part 70 Air Operating Permit and an Initial PSD Permit for construction and operation of three additional natural gas liquefaction trains (Trains 7, 8, and 9), which will be similar to the six existing trains at the terminal. Various emission sources associated with the existing infrastructure will be used to support the proposed trains. Emissions will be from thermal oxidizers (3), ground flares (2), compressor turbines (20), generator turbines (3), generator engines (4), storage tanks/drums (9), wastewater loading, and fugitives.

This permit was processed as an expedited permit in accordance with LAC 33:I.Chapter 18.

Permitted emissions, in tons per year, are as follows:

Pollutant	Emissions
PM ₁₀ /PM _{2.5}	178.39
SO ₂	20.87
NO _x	983.45
CO	808.18
VOC	146.57
GHG (CO ₂ (e))	5,795,189

PM₁₀/PM_{2.5}, NO_x, CO, VOC, and greenhouse gas (GHG) emissions from the proposed trains will be more than their respective PSD significance levels. These emissions were reviewed under the PSD regulations and documented in Permit PSD-LA-864. The proposed emissions will be controlled by BACT. Neither the project nor the general commercial, residential, industrial, or other growth associated with it is expected to have a significant adverse impact on soil, vegetation, visibility, or air quality in the area of the facility or any Class I area.

Increment consumptions for PM_{2.5} will be 5.88 µg/m³ (24-hour average) and for NO₂ will be 10.82 µg/m³ (annual average), which are less than the allowable Class II PSD increments of 9 µg/m³ (PM_{2.5}, 24-hour average) and 25 µg/m³ (NO₂, annual average).

A working draft of the proposed permit was submitted to the facility representative. Any remarks received during the technical review will be addressed in the "Worksheet for Technical Review of Working Draft of Proposed Permit". All the remarks received by LDEQ are included in the record that is available for public review.

The EAS submitted by the applicant addresses avoidance of potential and real environmental effects, balancing of social and economic benefits against environmental impact costs, and alternative sites, projects, and mitigative measures.

The public hearing will be conducted in accordance with La. R.S. 30:2017, which addresses the authority of the hearing officer, provides for the order in which speakers will be allowed to speak. A hearing officer will preside over the public hearing. This will be a formal hearing for the purpose of gathering facts and information. It will not include a “question and answer” component. In accordance with La. R.S. 30:2016, the hearing will be transcribed and become a part of the official public record.

Comments and requests for a public hearing or notification of the final decision can be submitted online on the public notice webpage (<http://www.deq.louisiana.gov/public-notices>), via personal delivery, U.S. mail, email, or fax. **Comments and requests for public hearings must be received by 4:30 pm CDT, Monday, June 15, 2026.** Delivery may be made to the drop-box at 602 N. 5th St., Baton Rouge, LA 70802. U.S. Mail may be sent to LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. Emails may be submitted to DEQ.PUBLICNOTICES@LA.GOV and faxes sent to (225) 219-3309. Persons wishing to receive notice of the final permit action must include a complete mailing address when submitting comments.

Please see additional instructions for comment submission, hand delivery and information regarding electronic submission at <http://www.deq.louisiana.gov/page/the-public-participation-group> or call (225) 219-3276.

A written response to all public comments will be prepared at the time of the final permit decision. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The application, proposed permits, and the statement of basis are available for review at the LDEQ, Public Records Center, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

Additional copies may be reviewed at the Cameron Parish Library – Johnson Bayou Branch, 4586 Gulf Beach Hwy., Johnson Bayou, LA 70631.

Individuals with a disability, who need an accommodation in order to participate in the public hearing, should contact Doug Bordelon at 225-219-1325 or Doug.Bordelon@la.gov four business days prior to the date of the public hearing.

Inquiries or requests for additional information regarding this permit action should be directed to Dan Nguyen, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3395.

Persons wishing to be included on the LDEQ permit public notice mailing list, wishing to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server, or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at DEQ.PUBLICNOTICES@LA.GOV or by phone at (225) 219-3035.

Permit public notices including electronic access to the proposed permit and statement of basis can be viewed at the LDEQ permits public notice webpage at <http://www.deq.louisiana.gov/public-notices> and general information related to the public participation in permitting activities can be viewed at <http://www.deq.louisiana.gov/page/the-public-participation-group>.

All correspondence should specify AI Number 119267; Permit Numbers 3184-V0 and PSD-LA-864; and Activity Numbers PER20250007 and PER20250008.

Scheduled Publication Date: Monday, May 11, 2026 – LDEQ Website

JEFF LANDRY
GOVERNOR



COURTNEY J. BURDETTE
SECRETARY

STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL SERVICES

Certified Mail No.

Agency Interest (AI) No. 119267
Activity No. PER20250008

Mr. Jack Holden
Cheniere Energy, Inc.
9243 Gulf Beach Highway
Cameron, Louisiana 70631

RE: Prevention of Significant Deterioration (PSD) Permit, PSD-LA-864
Sabine Pass LNG Terminal – Trains 7 - 9
Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Cameron, Cameron Parish, Louisiana

Dear Mr. Holden:

Enclosed is your permit, PSD-LA-864. Construction of the proposed Liquefaction Trains 7 – 9 is not allowed until such time as the corresponding Part 70 operating permit is issued.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Should you have any questions, contact Dan Nguyen of the Air Permits Division at (225) 219-3395 or dan.nguyen@la.gov.

Sincerely,

Amanda Vincent, PhD, PMP
Assistant Secretary

Date

AV/DCN
c: EPA Region 6

Agency Interest No. 119267

PSD-LA-864

**AUTHORIZATION TO CONSTRUCT A MAJOR MODIFICATION PURSUANT TO
THE PREVENTION OF SIGNIFICANT DETERIORATION REGULATIONS
IN THE LOUISIANA ENVIRONMENTAL REGULATORY CODE, LAC 33:III.509**

In accordance with the provisions of the Louisiana Environmental Regulatory Code, LAC 33:III.509,

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
9243 Gulf Beach Highway
Cameron, Louisiana 70631

is authorized to construct natural gas Liquefaction Trains 7, 8, and 9 and associated equipment at the Sabine Pass LNG Terminal, located at

9243 Gulf Beach Highway
Cameron, Louisiana 70631

subject to the emission limitations, monitoring requirements, and other conditions set forth herein.

This permit and authorization to construct shall expire at midnight on _____, 2028, unless physical on site construction has begun by such date, or binding agreements or contractual obligations to undertake a program of construction of the source are entered into by such date.

Signed this _____ day of _____, 2026.

Amanda Vincent, PhD, PMP
Assistant Secretary

Office of Environmental Services
Louisiana Department of Environmental Quality

BRIEFING SHEET

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 - 9
Cameron, Cameron Parish, Louisiana
Agency Interest No.: 119267 – PSD-LA-864

I. APPLICANT

Applicant: Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
9243 Gulf Beach Highway
Cameron, Louisiana 70631

Facility: Sabine Pass LNG Terminal – Trains 7 - 9

SIC Code: 4925

II. LOCATION

The proposed liquefaction trains will be located at 9243 Gulf Beach Highway, Cameron, Louisiana.

III. REVIEWING AGENCY

Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services/Air Permits Division
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

IV. PURPOSE

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC (SPLNG) have applied for a Prevention of Significant Deterioration (PSD) permit for three natural gas liquefaction trains (Trains 7 - 9).

V. PROJECT DESCRIPTION

SPLNG proposes to construct and operate three additional natural gas liquefaction trains (Trains 7 - 9) at the Sabine Pass LNG Terminal. The natural gas vaporization operation and natural gas Liquefaction Trains 1 through 6 currently operate under Permit PSD-LA-703(M10) at the Terminal. The proposed natural gas liquefaction trains will be similar to the existing trains at the terminal. Various emission sources associated with the existing infrastructure will be used to support the operation of the proposed trains. However, no physical modifications to any existing equipment will be required.

VI. APPLICABILITY AND REGULATED POLLUTANTS

The requirements of LAC 33:III.509 (Prevention of Significant Deterioration) apply to the modification of a major stationary source. Sabine Pass LNG Terminal is a major stationary source as defined in LAC 33:III.509.B, as it is a “stationary source that emits, or has the potential to emit, 250 tons per year or more of any air pollutant (except for GHGs).”

BRIEFING SHEET

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 - 9
Cameron, Cameron Parish, Louisiana
Agency Interest No.: 119267 – PSD-LA-864

Emissions increases from the proposed Trains 7 - 9, in tons per year, are as follows:

Pollutant	Baseline Actual	Post-Project Potential-to-Emit	Project Emissions Increase	Creditable Contemporaneous Change	Net Emissions Increase	PSD SILs	PSD Review?
PM ₁₀	11.84	201.60	189.76	-	189.76	15	Yes
PM _{2.5}	11.84	201.60	189.76	-	189.76	10	Yes
SO ₂	1.66	26.51	24.85	-	24.85	40	No
NO _x	215.67	2,063.10	1,847.43	-	1,847.43	40	Yes
CO	78.51	1,761.01	1,682.50	-	1,682.50	100	Yes
VOC	10.67	211.20	200.53	+ 2.04	202.57	40	Yes
H ₂ S	-	0.10	0.10	-	0.10	10	No
GHG (CO ₂ e)	-	6,942,511	6,942,511	+ 647	6,943,158	75,000	Yes

The proposed Trains 7 - 9 will cause particulate matter (PM₁₀/PM_{2.5}), nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), and greenhouse gas (GHG) emissions to increase more than their respective PSD significance levels (SILs); thus, PSD review is required for these pollutants.

VII. PRELIMINARY DETERMINATION

LAC 33:III.509.Q.2.a requires LDEQ to “make a preliminary determination whether construction should be approved, approved with conditions, or disapproved.” Based on the findings set forth in the Preliminary Determination Summary, the Office of Environmental Services has made a preliminary determination to approve construction of Trains 7 - 9 at the Sabine Pass LNG Terminal, which is located in Cameron, Cameron Parish, Louisiana, subject to the maximum allowable emissions rates and specific conditions established herein.

VIII. PROCESSING TIME

Application Date: June 24, 2025
Additional Information Date: July 11, August 14 and 22, November 4 and 21, 2025,
March 23, April 6, April 7, and May 1, 2026
Effective Completeness Date: April 28, 2026

IX. PUBLIC NOTICE

In accordance with LAC 33:III.509.Q.2.c, a notice requesting public comment on the proposed permit was published on the department’s website on xxxx, 2026. On xxxx, 2026 copies of the public notice were mailed to the individuals who have requested to be placed on the mailing list maintained by the Office of Environmental Services (OES). The proposed permit was submitted to EPA on xxxx, 2026. A public hearing was held on xxxx,

BRIEFING SHEET

**Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 - 9
Cameron, Cameron Parish, Louisiana
Agency Interest No.: 119267 – PSD-LA-864**

2026 at the xxxx. Comments received during the comment period, including comments received at the public hearing, will be considered prior to a permit decision.

PRELIMINARY DETERMINATION SUMMARY
Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 - 9
Cameron, Cameron Parish, Louisiana
Agency Interest No.: 119267
PSD-LA-864 – April 28, 2026

PSD REQUIREMENTS

This Preliminary Determination Summary summarizes the results of the reviews and analyses required by LAC 33:III.509. PSD requirements are outlined below.

- A. Control Technology Review [LAC 33:III.509.J]
 - 1. Best Available Control Technology (BACT)
 - 2. Collateral Environmental Impacts

- B. Air Quality Analysis [LAC 33:III.509.M]
 - 1. Preconstruction Monitoring
 - 2. Background Concentrations

- C. Source Impact Analysis [LAC 33:III.509.K]
 - 1. Preliminary Screening
 - 2. National Ambient Air Quality Standards
 - 3. PSD Increments [LAC 33:III.509.C]
 - 4. Secondary PM_{2.5} Formation

- D. Additional Impact Analyses [LAC 33:III.509.O]
 - Visibility
 - Soils and Vegetation
 - Commercial, Residential, Industrial, and Other Growth

- E. Additional Requirements for Sources Impacting Class I Areas [LAC 33:III.509.P]

In the event of a discrepancy in the provisions found in the application and those in this Preliminary Determination Summary, the Preliminary Determination Summary shall prevail.

PRELIMINARY DETERMINATION SUMMARY

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 - 9
Cameron, Cameron Parish, Louisiana
Agency Interest No.: 119267
PSD-LA-864 – April 28, 2026

A. CONTROL TECHNOLOGY REVIEW – Best Available Control Technology (BACT)

Per LAC 33:III.509.J.2, a major stationary source shall apply BACT for each regulated NSR pollutant that it would have the potential to emit in significant amounts.

Consistent with EPA guidance, LDEQ utilizes the “top-down” approach to determine BACT.¹ This approach involves determining the most stringent control technique available for a similar or identical source. If it can be shown that this level of control is infeasible based on technical considerations or adverse energy, environmental, or economic impacts, it is rejected, and the next most stringent level of control is determined and similarly evaluated. This process continues until a control level is arrived at which cannot be eliminated due to technical difficulties or environmental, energy, or economic impacts. However, BACT may not result in emissions of any pollutant that would exceed an applicable standard under 40 CFR Part 60, 61, or 63. The five steps in the top-down process are described below.²

Step 1: The first step is to identify all “available” control options. Available control options are those air pollution control technologies or techniques with a practical potential for application to the emissions unit and the regulated pollutant under evaluation.

Step 2: In the second step, the technical feasibility of each control option identified in step 1 is evaluated with respect to source-specific (or emissions unit-specific) factors. Technically infeasible control options are then eliminated from further consideration.

Step 3: In step 3, all control alternatives not eliminated in step 2 are ranked in order of overall control effectiveness for the pollutant under review, with the most effective control alternative at the top. An applicant proposing the top control alternative need not provide cost and other detailed information in regard to other control options.³

Step 4: Next, the energy, environmental, and economic impacts of the available and technically feasible control options are considered. Impacts influencing LDEQ’s BACT determination are addressed in this Preliminary Determination Summary; those which do not result in the elimination of a control option are detailed in the permit application.

Step 5: The most effective control option not eliminated in step 4 is selected as BACT.

¹ Note that it remains EPA’s *policy* to use the top-down process to determine BACT. According to EPA’s “PSD and Title V Permitting Guidance for Greenhouse Gases”:

EPA has not established the top-down BACT process as a binding requirement through rule. Thus, permitting authorities that implement an EPA-approved PSD permitting program contained in their State Implementation Plans (SIPs) may use another process for determining BACT in permits they issue ... so long as that process (and each BACT determination made through that process) complies with the relevant statutory and regulatory requirements. (p. 19, internal citations omitted).

² Where the top-down process does not provide meaningful information (e.g., if there is only one available control option), LDEQ may not summarize each of the five steps.

³ “New Source Review Workshop Manual” (draft), October 1990 (p. B.8)

PRELIMINARY DETERMINATION SUMMARY

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 - 9
Cameron, Cameron Parish, Louisiana
Agency Interest No.: 119267
PSD-LA-864 – April 28, 2026

DESCRIPTION OF CONTROL TECHNOLOGY

1. **Low Sulfur Fuels:** Among the commonly used fuel, natural gas has one of the lowest sulfur contents. Pipeline quality natural gas typically has sulfur contents of 2,000 grains per million cubic feet. Low sulfur contents result in lower PM/PM₁₀/PM_{2.5} emissions. Hence, use of low sulfur fuel such as natural gas is considered as a control technology.
2. **Good Combustion Practices:** Use of good combustion practices for operating and maintaining the turbines according to the manufacturer's recommendations maximizes fuel efficiency and minimizes emissions. Good combustion practices include good equipment/engine design, use of natural gas for good mixing, minimizing duration of startup/shutdown, and proper combustion techniques such as optimizing the air-to-fuel ratio and inlet air conditioning/filtration. While these control options are typically less efficient than other technologies, they have minimal environmental and energy impacts.
3. **Turbocharger and Aftercooler:** Turbocharging is primarily used to increase power output and reduce fuel consumption from a given displacement engine. At rated power, a typical diesel engine loses about 30 percent of its energy through the exhaust. A turbocharger uses the waste energy in the exhaust gas to drive a turbine linked to a centrifugal compressor, which then boosts the intake air pressure. The increase in power also results in an increase in temperature, which may limit the amount of air that can be charged to the cylinder at a given pressure. Therefore, a heat exchanger, called an aftercooler, is normally used to lower the temperature of the intake air. Reducing the intake air temperature directly reduces the peak cylinder temperature during combustion, which is where NO_x is formed.
4. **EMx™:** The EMx™ system (formerly SCONOX™) is a post-combustion technology that utilizes a proprietary catalytic oxidation and absorption technology using a single catalyst for removal of NO_x, CO, and VOCs. While EMx™ achieves low NO_x emission levels, it is a challenge to operate due to high operating expenses and maintenance issues.

POTENTIAL CONTROL OPTIONS FOR PM₁₀/PM_{2.5} EMISSIONS

1. **Fabric Filters (Baghouses):** The flue gas is passed through a tightly woven or felted fabric, causing PM in the flue gas to be collected on the fabric by sieving and other mechanisms. Fabric filters may be in the form of sheets, cartridges, or bags, with a number of individual fabric filter units housed together in a group. Bags are the most common type of fabric filter. The dust cake that forms on the filter from the collected PM can significantly increase collection efficiency.
2. **Scrubbers:** Wet scrubbers control PM emissions by removing particulates from the process gas streams. Wet scrubbers implement different mechanisms such as condensation, inertial impaction of PM with water droplets, and reactions of PM and PM precursors with a scrubbing reagent.

PRELIMINARY DETERMINATION SUMMARY

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 - 9
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POTENTIAL CONTROL OPTIONS FOR NO_x EMISSIONS

1. **Selective Catalytic Reduction (SCR):** SCR systems selectively reduce NO_x emissions by injecting ammonia (NH₃) into the exhaust gas stream upstream of a catalyst. Nitrogen oxides, NH₃, and O₂ react on the surface of the catalyst to form N₂ and H₂O.
2. **Water/Steam Injection:** Water and steam injection technology has been demonstrated to effectively suppress NO_x emissions from gas turbines. The water or steam injection increases the thermal mass by dilution, thereby reducing peak temperatures in the flame zone. Furthermore, the latent heat of vaporization is absorbed from the flame zone, which reduces NO_x formation due to combustion.
3. **Dry Combustion Controls:** Dry combustion control technology either lowers the combustor temperature using lean mixtures of air and/or fuel staging or decreases the residence time of the combustor. Staged combustion is identified through a variety of names, including Dry Low NO_x (DLN), Low NO_x Burners (LNB), Dry Low Emissions (DLE), or SoLoNO_x.

Two-stage lean/lean combustors are essentially fuel-staged, premixed combustors in which each stage burns lean. This configuration allows the turbine to operate with a significantly lean mixture while ensuring a stable flame. Low NO_x emissions result through cooler flame temperatures associated with lean combustion and avoidance of localized "hotspots" by premixing the fuel and air.

Two stage rich/lean combustors are essentially air-staged, premixed combustors in which the primary zone is operated fuel-rich and the secondary zone is operated fuel-lean. Due to incomplete combustion, the rich mixture produces lower temperatures (compared to stoichiometric) and higher concentrations of CO and H₂. Also, the rich mixture decreases available oxygen for NO_x generation. Prior to secondary zone entry, the primary zone exhaust is quenched by large amounts of air, and a lean mixture is created. The lean mixture is pre-ignited, and the combustion completed in the secondary zone. Second stage NO_x formation is minimized through combustion in a fuel-lean, lower temperature environment.

4. **Catalytic Combustion Controls (XONON™):** This technology is potentially capable of reducing NO_x emissions from gas turbines. However, based on vendor literature, this technology is only available for turbines smaller than the proposed turbines.
5. **Selective Non-Catalytic Reduction (SNCR):** Selective Non-Catalytic Reduction achieves NO_x emissions reductions via the injection of ammonia or urea into specific temperature zones in the exhaust gas. SNCR requires a higher operating temperature than SCR, sufficient residence time of the exhaust gas within a specific temperature range, and does not use a catalyst. The operating temperature range required for effective operation is 1,600 to 2,100°F. SNCR is less effective at lower levels of uncontrolled NO_x, requiring an uncontrolled NO_x emissions concentration above 200 ppm.

PRELIMINARY DETERMINATION SUMMARY

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 - 9
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6. **Non-Selective Catalytic Reduction (NSCR):** Nonselective Catalytic Reduction uses a catalyst without injected reagents to reduce both NO_x and CO emissions. It is effective only in a stoichiometric or fuel-rich environment where combustion gas is nearly depleted of oxygen.

POTENTIAL CONTROL OPTIONS FOR CO/VOC EMISSIONS

1. **Oxidation Catalyst:** The CO catalyst promotes the oxidation of CO and hydrocarbon compounds to carbon dioxide (CO₂) and water (H₂O) as the emission stream passes through the catalyst bed. The oxidation process takes place spontaneously, without the requirement for introducing reactants.
2. **Thermal Oxidizers:** Thermal oxidizers, or thermal incinerators, are combustion devices that control VOC, CO, and volatile HAP emissions by combusting them to carbon dioxide (CO₂) and water. Thermal oxidizers are similar to catalytic oxidizers (catalytic oxidizers use a catalyst to promote the oxidation reaction). Important design factors include temperature (a temperature high enough to ignite the organic constituents in the waste stream), residence time (sufficient time for the combustion reaction to occur), and turbulence or mixing of the combustion air with the waste gas
3. **Non-Selective Catalytic Reduction (NSCR):** Nonselective Catalytic Reduction uses a catalyst without injected reagents to reduce both NO_x and CO emissions. It is effective only in a stoichiometric or fuel-rich environment where combustion gas is nearly depleted of oxygen.

POTENTIAL CONTROL OPTIONS FOR GREENHOUSE GAS EMISSIONS

1. **Use of Low Carbon Fuels:** Use of gaseous fuels, rather than other fossil fuels such as fuel oil or coal, results in lower GHG emissions per unit of energy output. 40 CFR Part 98, Table C-1 (U.S. EPA's Mandatory GHG Reporting Rule) indicates that gaseous fuels (e.g., natural gas or fuel gas) have some of the lowest CO₂ generation rates of any of the fuels listed.
2. **Employment of Efficient Designs and Practices:** The Project's stationary combustion turbines have highly efficient designs utilizing lean pre-mix modes of operation to ensure an optimum staging of air/fuel ratios to maximize fuel efficiency and minimize incomplete combustion. Since methane is the principal component in the fuel gas, un-combusted methane release to the atmosphere is minimized. Since the equipment is designed to be highly efficient, useful output per unit of fuel input is maximized, reducing fuel combustion requirements and generation of CO₂. In addition, every stationary combustion turbine associated with the project will be connected to either a heat recovery steam generator ("HRSG") to support combined cycle power generation or a waste heat recovery unit ("WHRU") to control process oil temperatures.

PRELIMINARY DETERMINATION SUMMARY

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 - 9
Cameron, Cameron Parish, Louisiana
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3. **Carbon Capture and Sequestration/Storage (CCS):** CCS requires three separate and distinct steps. If any one of the three CCS steps is unavailable or technically infeasible, CCS is not viable as BACT.

Step 1: Separating and capturing CO₂ from a combustion unit's exhaust gas;

Step 2: Pressurizing and transporting the captured CO₂ for injection; and

Step 3: Injecting the CO₂ into an available and permanent geologic storage structure.

Step 1: Separate and Capture of CO₂

There are three different types of CO₂ capture systems: post-combustion, pre-combustion, and oxyfuel combustion. The important factors relative to selection of the appropriate CO₂ capture system are the concentration of CO₂ in the gas stream, the pressure of the gas stream, and the fuel type (solid or fuel).

Post-combustion Capture: A post-combustion capture system separates CO₂ from the flue gases produced by the combustion of the primary fuel in air. Typically, these systems use a liquid solvent to capture the small concentration of CO₂ (3 percent by volume to 15 percent by volume) present in the flue gas stream in which the main constituent is nitrogen. These systems typically use an organic solvent such as monoethanolamine (MEA) to separate CO₂ from the flue gas stream.⁴

Pre-combustion Capture: The first stage of a pre-combustion capture process reaction produces a mixture of hydrogen and carbon monoxide (syngas) from the primary fuel. This reaction can be achieved by either “steam reforming” or “partial oxidation” based on the primary fuel (gaseous, solid, or liquid fuel). CO₂ is removed from the CO/H₂ mixture by the “shift” reaction by the addition of steam (water gas shift reaction).⁵

Oxy-combustion Capture: The oxy-fuel combustion process eliminates nitrogen from the flue gas by combusting a hydrocarbon or carbonaceous fuel in either pure oxygen or a mixture of pure oxygen and a CO₂-rich recycled flue gas. The flue gas consists mainly of CO₂ and water vapor together with excess oxygen required to ensure complete combustion of the fuel. The flue gas, after cooling to condense water vapor, contains about 80 to 98 percent CO₂ depending on the fuel used. This concentrated CO₂ stream can be compressed, dried, and further purified before delivery into a pipeline for storage.⁶

Step 2: Pressurize and Transport of CO₂

CO₂ can be transported in three states: gas, liquid, and solid. Typically, commercial-scale transport uses tanks, pipelines, and ships for gaseous and liquid CO₂. Gaseous CO₂ transported at atmospheric pressure occupies a large volume. Therefore, gaseous CO₂ must

⁴ Intergovernmental Panel on Climate Change, “Carbon Dioxide Capture and Storage”, 2005, p. 25. Available at https://www.ipcc.ch/site/assets/uploads/2018/03/srccs_wholereport-1.pdf. Accessed July 2022.

⁵ *Ibid.*

⁶ *Ibid.*

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be compressed, and compressed CO₂ is then transported by pipeline. The volume of CO₂ can be further reduced by liquefaction, solidification, or hydration for transportation.

Step 3: Storage of CO₂

CO₂ storage potentially can be accomplished by the following methods:

- a. Underground geological storage;
- b. Ocean storage;
- c. Mineral carbonation; and
- d. Industrial uses of CO₂ such as Enhanced Oil Recovery (EOR).

SECTION 1.a – BACT for PM₁₀/PM_{2.5} Emissions from Combustion Turbines

Step 1 – Identify Potential Control Technologies

1. Use of Low Sulfur Fuels (natural gas);
2. Good Combustion Practices; and
3. Fabric Filters (Baghouses).

Step 2 – Eliminate Technically Infeasible Options

Use of Low Sulfur Fuels: **Feasible.**

Good Combustion Practices: **Feasible.**

Fabric Filters (Baghouses): **Infeasible.** PM emissions from combustion of gaseous fuels contain particulates less than 1 µm in nominal diameter. However, the standard baghouse is designed to collect particulates greater than 1 µm in nominal diameter. Therefore, this technology is not applicable to this source type and is considered infeasible.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

SPLNG proposes both feasible options as BACT.

Step 4 – Evaluate Most Effective Controls

SPLNG proposes both feasible options as BACT.

Step 5 – Select BACT

Use of low sulfur fuels (natural gas) and good combustion practices are selected as BACT.

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SECTION 1.b – BACT for NO_x Emissions from Combustion Turbines

Step 1 – Identify All Control Technologies

1. Selective Catalytic Reduction (SCR);
2. Water or Steam Injection;
3. Dry Combustion Control;
4. Catalytic Combustion Controls (XONON™);
5. Selective Non-Catalytic Reduction (SNCR);
6. Non-Selective Catalytic Reduction (NSCR);
7. EMx™; and
8. Good Combustion Practices.

Step 2 – Eliminate Technically Infeasible Options

Selective Catalytic Reduction (SCR): **Feasible**, except during start-up, shutdown, and maintenance (SSM) events.

Water or Steam Injection: **Feasible**.

Dry Combustion Controls: **Feasible**.

Catalytic Combustion Controls (XONON™): **Infeasible**. Catalytic combustion is not commercially available for the turbines of the size proposed for the Sabine Pass LNG Terminal.

Selective Non-Catalytic Reduction (SNCR): **Infeasible**. The exhaust temperature of the proposed turbines is far below the required temperature for using this technology.

Non-Selective Catalytic Reduction (NSCR): **Infeasible**. The oxygen concentration in the exhaust of typical gas-fired turbines is 15 percent due to the lean burn nature of combustion. To successfully remove NO_x, the exhaust stream must contain less than 0.5 percent oxygen upstream of the catalyst. Since the oxygen concentration in the turbine exhaust stream is outside the design range of an NSCR system, this control technology is eliminated as BACT for NO_x.

EMx™: **Infeasible**. This technology has been successfully installed on small gas-fired turbines sized from 5 to 45 MW. The proposed turbines are much larger than the turbines for which this technology has been demonstrated to be effective, and EMx is not commercially available for the source type under consideration; therefore, this technology is eliminated.

Good Combustion Practices: **Feasible**.

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Step 3 – Rank Remaining Control Technologies by Control Effectiveness

Hierarchy	Control Option	Emission Factor
1	SCR	2-5 ppm @ 15% O ₂
2	Dry Combustion Controls	15 ppm @ 15% O ₂
3	Water Injection	25 ppm @ 15% O ₂
4	Good Combustion Practices	-

Step 4 – Evaluate Most Effective Controls

SPLNG proposes the most stringent option (SCR) as BACT; therefore, further analysis is not required.

Step 5 – Select BACT

- Normal operation: SCR and good combustion practices for refrigeration compressor turbines.
- Normal operation: SCR, good combustion practices, in combination with dry combustion controls (dry low-NO_x, DLN) for generator turbines, Mixed Refrigerant Compressor Turbine, and Boil-off Gas Re-compressor Turbine are selected as BACT to limit NO_x emissions ≤ 4.5 ppm @15% O₂.
- Startups, shutdowns, and maintenance (SSM): Good combustion practices to minimize NO_x emissions from generator turbines and Boil-off Gas Re-compressor Turbine.
- Startups, shutdowns, and maintenance (SSM): Good combustion practices to limit NO_x emissions from refrigeration turbines and Mixed Refrigerant Turbine ≤ 25 ppm @15% O₂ for base load rating > 70% and NO_x ≤ 96 ppm @15% O₂ for base load rating < 70%.

SECTION 1.c – BACT for CO Emissions from Combustion Turbines

Step 1 – Identify All Control Technologies

1. Oxidation Catalyst;
2. Good Combustion Practices;
3. EMx™; and
4. Non-Selective Catalytic Reduction (NSCR)

Step 2 – Eliminate Technically Infeasible Options

Oxidation Catalyst: **Feasible.**

Good Combustion Practices: **Feasible.**

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EMx™: **Infeasible.** This technology has been successfully installed on small gas-fired turbines sized from 5 to 45 MW. The proposed turbines are twice the size of turbines for which this technology has been demonstrated to be effective, and EMx is not commercially available for the source type under consideration; therefore, this technology is eliminated.

Non-Selective Catalytic Reduction (NSCR): **Infeasible.** The oxygen concentration in the exhaust of typical gas-fired turbines is 15 percent due to the lean burn nature of combustion. To successfully remove CO, the exhaust stream must contain less than 0.5 percent oxygen upstream of the catalyst. Since the oxygen concentration in the turbine exhaust stream is outside the design range of an NSCR system, this control technology is eliminated as BACT for CO.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

SPLNG proposes both feasible control options as BACT.

Step 4 – Evaluate Most Effective Controls

SPLNG proposes both feasible control options as BACT.

Step 5 – Select BACT

Oxidation catalyst and good combustion practices are selected as BACT to limit CO emissions from turbines ≤ 5.3 ppm @15% O₂. During the startup, shutdown, and maintenance (SSM) periods, good combustion practices are selected as BACT to limit CO emissions from turbines ≤ 25.00 lbs/hr.

SECTION 1.d – BACT for VOC Emissions from Combustion Turbines

Step 1 – Identify All Control Technologies

1. Oxidation Catalyst;
2. Use of Clean Natural Gas;
3. Good Combustion Practices;
4. Proper Equipment Design; and
5. Thermal Oxidizer.

Step 2 – Eliminate Technically Infeasible Options

Oxidation Catalyst: **Feasible.**

Use of Clean Natural Gas: **Feasible.**

Good Combustion Practices: **Feasible.**

Proper Equipment Design: **Feasible.**

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Thermal Oxidizer: **Infeasible.** VOC destruction efficiency depends upon design criteria (i.e., chamber temperature, residence time, inlet VOC concentration, compound type, and degree of mixing). Thermal incinerators perform best at inlet hydrocarbon concentrations of around 1,500 to 3,000 ppm and 870°C combustion zone temperature. The effectiveness of this control technology significantly decreases with decreases in hydrocarbon concentrations. Since the turbine exhaust stream has a relatively low VOC concentration and is rich in other non-VOC components, the use of this control technology is deemed technically infeasible.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

SPLNG proposes all feasible control options as BACT.

Step 4 – Evaluate Most Effective Controls

SPLNG proposes all feasible control options as BACT.

Step 5 – Select BACT

Oxidation catalyst, good combustion practices, proper equipment design, and use of clean natural gas are selected as BACT to limit VOC emissions from turbines to no more than 0.0021 lb/MM BTU heat input.

SECTION 1.e – BACT for GHG Emissions from Combustion Turbines

Step 1 – Identify All Control Technologies

1. Use of Low Carbon Fuels;
2. Good Combustion Practices;
3. Employment of Efficient Designs and Practices; and
4. Carbon Capture and Sequestration (CCS).

Step 2 – Eliminate Technically Infeasible Options

Use of Low Carbon Gaseous Fuels: **Feasible.**

Good Combustion Practices: **Feasible.**

Employment of Efficient Designs and Practices: **Feasible.**

Carbon Capture and Sequestration (CCS): **Economically Infeasible.**

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

SPLNG proposes all feasible control options as BACT.

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Step 4 – Evaluate Most Effective Controls

SPLNG considered the economic impacts from the implementation of CCS technology for the natural gas-fired turbines. CO₂ can be stored in a deep saline aquifer for long-term geologic storage.⁷ While sequestration of CO₂ in a saline aquifer has not been demonstrated in Southwest Louisiana, SPLNG believes that such injection and sequestration is possible, at least for some volume of CO₂, depending upon detailed geological investigation prior to any such project. Therefore, SPLNG has conservatively conducted a cost estimate analysis for CO₂ storage via a local Class VI Underground Injection Well connected to Sabine Pass LNG by a pipeline.

Table II provides the summary of the estimated costs required to capture, compress, transport, and store CO₂ emissions from the terminal. CCS was deemed economically infeasible.

Step 5 – Select BACT

Use of low carbon fuels, good combustion practices, and employment of energy efficient designs and practices are selected as BACT for GHG.

SECTION 2.a – BACT for PM₁₀/PM_{2.5} Emissions from Thermal Oxidizers

Step 1 – Identify Potential Control Technologies

1. Use of natural gas;
2. Good Combustion Practices;
3. Fabric Filters (Baghouses); and
4. Wet Scrubbers.

Step 2 – Eliminate Technically Infeasible Options

Use of natural gas: **Feasible.**

Good Combustion Practices: **Feasible.**

Baghouses: **Infeasible.** PM emissions from combustion of gaseous fuels contain particulates less than 1 μm in nominal diameter. However, the standard baghouse is designed to collect particulates greater than 1 μm in nominal diameter. Therefore, this technology is not applicable to this source type and is considered infeasible.

Wet Scrubber: **Infeasible.** The inlet stream temperature from the proposed thermal oxidizers (1,650 °F) to a wet scrubbing system would be outside the optimal design temperature range for a wet scrubbing system (40°F to 700°F). Therefore, this technology

⁷ U.S. Department of Energy Office of Fossil Energy, NETL Carbon Storage Atlas, Fifth Edition, 2015, p. 28. Available at: <https://www.netl.doe.gov/sites/default/files/2018-10/ATLAS-V-2015.pdf>. Accessed July 2022.

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is considered infeasible.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

SPLNG proposes both feasible control options as BACT.

Step 4 – Evaluate Most Effective Controls

SPLNG proposes both feasible control options as BACT.

Step 5 – Select BACT

Use of natural gas and good combustion practices are selected as BACT.

SECTION 2.b – BACT for NO_x Emissions from Thermal Oxidizers

Step 1 – Identify All Control Technologies

1. Selective Catalytic Reduction (SCR);
2. Low NO_x Burners;
3. Selective Non-Catalytic Reduction (SNCR);
4. Non-Selective Catalytic Reduction (NSCR);
5. EM_xTM; and
6. Good Combustion Practices.

Step 2 – Eliminate Technically Infeasible Options

Selective Catalytic Reduction (SCR): **Infeasible.** The thermal oxidizers are utilized to control any reduced sulfur compounds. The thermal oxidizers are designed to maximize the destruction efficiency by optimizing the combustion temperature. The add-on NO_x control would require significant changes to the thermal oxidizer design. Hence, this control technology was deemed as technologically infeasible.

Low-NO_x Burners: **Feasible.**

Selective Non-Catalytic Reduction (SNCR): **Infeasible.** The exhaust stream of each thermal oxidizer contains NO_x at levels significantly less than 200 ppm.

Non-Selective Catalytic Reduction (NSCR): **Infeasible.** The exhaust temperature from the thermal oxidizers is much higher than the appropriate range for NSCR to be effective.

EM_xTM: **Infeasible.** For the EM_xTM system, the maximum inlet temperature of the catalyst is 700°F. The exhaust temperature of the thermal oxidizers will be in excess of 700°F, rendering EM_xTM infeasible as a NO_x control technology for these turbines.

Good Combustion Practices: **Feasible.**

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Step 3 – Rank Remaining Control Technologies by Control Effectiveness

SPLNG proposes both feasible control options as BACT.

Step 4 – Evaluate Most Effective Controls

SPLNG proposes both feasible control options as BACT.

Step 5 – Select BACT

Low NO_x burners and good combustion practices are selected as BACT for NO_x emissions.

SECTION 2.c – BACT for CO Emissions from Thermal Oxidizers

Step 1 – Identify All Control Technologies

1. Oxidation Catalyst;
2. Good Combustion Practices; and
3. EM_xTM.

Step 2 – Eliminate Technically Infeasible Options

Oxidation Catalyst: **Infeasible**. The exhaust temperatures associated with the proposed thermal oxidizers (1,650°F) are outside the acceptable operating temperature range for oxidation catalyst (600 °F to 800°F). As such, oxidation catalyst is considered technically infeasible.

Good Combustion Practices: **Feasible**.

EM_xTM: **Infeasible**. For the EM_xTM system, the maximum inlet temperature of the catalyst is 700°F. The exhaust temperature of the thermal oxidizers will be in excess of 700°F, rendering EM_xTM infeasible as a CO control technology for these thermal oxidizers.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

Good combustion practices are the only feasible control option.

Step 4 – Evaluate Most Effective Controls

Good combustion practices are the only feasible control option.

Step 5 – Select BACT

Good combustion practices are selected as BACT for CO emissions.

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SECTION 2.d – BACT for VOC Emissions from Thermal Oxidizers

Step 1 – Identify All Control Technologies

1. Oxidation Catalyst; and
2. Good Combustion Practices and Proper Design.

Step 2 – Eliminate Technically Infeasible Options

Oxidation Catalyst: **Infeasible**. The exhaust temperatures associated with the proposed thermal oxidizers (1,650°F) are outside the acceptable operating temperature range for oxidation catalyst (600 °F to 800°F). As such, oxidation catalyst is considered technically infeasible.

Combustion Process Design and Good Combustion Practices: **Feasible**.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

Good combustion practices and proper design are the only feasible control options.

Step 4 – Evaluate Most Effective Controls

Good combustion practices and proper design are the only feasible control options.

Step 5 – Select BACT

Good combustion practices and proper design are selected as BACT for VOC emissions.

SECTION 2.e – BACT for Greenhouse Gases Emissions from Thermal Oxidizers

Step 1 – Identify All Control Technologies

1. Use of Low Carbon Fuels;
2. Good Combustion Practices;
3. Employment of Efficient Designs and Practices; and
4. Carbon Capture and Sequestration/Storage.

Employment of Efficient Designs and Practices: The proposed stationary combustion turbines use highly efficient designs utilizing lean pre-mix modes of operation to ensure an optimum staging of air/fuel ratios to maximize fuel efficiency and minimize incomplete combustion. Since methane is the principal component in the fuel gas, un-combusted methane release to the atmosphere is minimized. Since the equipment is designed to be highly efficient, useful output per unit of fuel input is maximized, reducing fuel combustion requirements and generation of CO₂. In addition, every stationary combustion turbine associated with the project is connected to either a heat recovery steam generator

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(“HRSG”) to support combined cycle power generation or a waste heat recovery unit (“WHRU”) to control process oil temperatures.

Step 2 – Eliminate Technically Infeasible Options

Use of Low Carbon Gaseous Fuels: Feasible.

Good Combustion Practices: Feasible.

Employment of Efficient Designs and Practices: Feasible.

Carbon Capture and Sequestration (CCS): Economically Infeasible.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

SPLNG proposes all three feasible control options as BACT; therefore, further analysis is not required.

Step 4 – Evaluate Most Effective Controls

SPLNG considered the economic impacts from the implementation of CCS technology for the thermal oxidizers. CO₂ can be stored in a deep saline aquifer for long-term geologic storage.⁸ While sequestration of CO₂ in a saline aquifer has not been demonstrated in Southwest Louisiana, SPLNG believes that such injection and sequestration is possible, at least for some volume of CO₂, depending upon detailed geological investigation prior to any such project. Therefore, SPLNG has conservatively conducted a cost estimate analysis for CO₂ storage via a local Class VI Underground Injection Well connected to Sabine Pass LNG by a pipeline.

Table II provides the summary of the estimated costs required to capture, compress, transport, and store CO₂ emissions from the terminal. CCS was deemed economically infeasible.

Step 5 – Select BACT

Use of low carbon fuels, good combustion practices, and employment of efficient designs and practices are selected as BACT for GHG emissions from the thermal oxidizers.

⁸ U.S. Department of Energy Office of Fossil Energy, NETL Carbon Storage Atlas, Fifth Edition, 2015, p. 28. Available at: <https://www.netl.doe.gov/sites/default/files/2018-10/ATLAS-V-2015.pdf>. Accessed July 2022.

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SECTION 3.a – BACT for PM₁₀/PM_{2.5} Emissions from Emergency Generator Engines

Step 1 – Identify Potential Control Technologies

1. Good Combustion Practices;
2. Proper Engine Design;
3. Use of Low Sulfur Fuel;
4. Limit Hours of Operation;
5. Post-Combustion PM Control such as Diesel Particulate Filter; and
6. Turbocharger and Aftercooler.

Proper Engine Design: Proper (i.e., fuel efficient) engine design utilizes less fuel for combustion, which reduces air pollutants generated from the fuel combustion.

Post-Combustion PM Control such as Diesel Particulate Filter: PM removal from diesel exhaust via a diesel particulate filter (DPF) is by physical filtration. A typical design utilizes a ceramic honeycomb-shaped channel through which exhaust gases flow. PM is deposited on both sides of the channel walls.

Step 2 – Eliminate Technically Infeasible Options

Good Combustion Practices: **Feasible.**

Proper Engine Design: **Feasible.**

Use of Low Sulfur Fuel: **Feasible.**

Limit Hours of Operation: **Feasible.**

Post-Combustion PM Control such as Diesel Particulate Filter: **Feasible.**

Turbocharger and Aftercooler: **Feasible.**

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

SPLNG proposes all feasible control options as BACT, except post-combustion PM control.

Step 4 – Evaluate Most Effective Controls

The emergency generators operate intermittently with minimal emissions; therefore, a diesel particulate filter, although feasible, would not be cost-effective.

Step 5 – Select BACT

Proper engine design, good combustion practices, use of low sulfur fuel, use of a turbocharger and aftercooler, and limiting hours of non-emergency operation for each emergency generator to \leq 100 hours/year to maintain PM₁₀/PM_{2.5} emissions at or below the applicable standard of 40 CFR 60 Subpart IIII are selected as BACT.

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SECTION 3.b – BACT for NO_x Emissions from Emergency Generator Engines

Step 1 – Identify All Control Technologies

1. Selective Non-Catalytic Reduction (SNCR);
2. Non-Selective Catalytic Reduction (NSCR);
3. Selective Catalytic Reduction (SCR);
4. EM_xTM;
5. Good Combustion Practices;
6. Proper Engine Design;
7. Fuel Injection Timing Retard;
8. Use of Low Sulfur Fuel;
9. Derating Engines;
10. 4-way Catalyst Converter with Exhaust Gas Recirculation System;
11. Turbocharger and Aftercooler; and
12. Limit Hours of Operation.

Fuel Injection Timing Retard

Fuel injection timing retard refers to the practice of delaying the start of fuel injection leading to delay in the start of combustion, thus causing reduction in NO_x emissions from a diesel engine. Delaying the start of combustion by retarding injection timing aligns the heat release from the fuel combustion with the portion of the combustion stroke of the engine cycle after the piston has begun to move down. By doing so, the cylinder volume is increasing, and that heat is being extracted from the hot gases, thus lowering the temperature. NO_x is reduced because the premixed burning phase is shortened and because cylinder temperature and pressure are lowered. NO_x emission reductions can vary from 20 - 30%.

Use of Low Sulfur Fuel

Use of clean, low-sulfur diesel fuel improves combustion efficiency, thus reducing NO_x emissions.

Proper Engine Design: Proper (i.e., fuel efficient) engine design utilizes less fuel for combustion, which reduces air pollutants generated from the fuel combustion.

Lean Burn Combustion: Lean combustion involves increasing the air-to-fuel ratio of the fuel so that the peak and average temperatures within the engine will be less than that of the stoichiometric mixture, thus suppressing thermal NO_x formation. The introduction of excess air can also reduce residence time at peak temperatures.

Derating Engines: An engine can be derated by restricting its operation to lower levels of power than normal for the given application. Derating reduces cylinder pressures and temperatures and can lower NO_x formation rates. Engine derating is accomplished by replacing the injector nozzles with those with smaller holes to atomize the smaller amount

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of fuel used. The turbocharger nozzle rings spin the turbocharger faster, thus compressing a greater volume of air for a given volume of gas.

4-way Catalyst Converter with Exhaust Gas Recirculation System: This control system consists of two catalyst beds in series. The first bed contains a lean NOx catalyst, and NOx emissions are reduced by the addition of supplemental fuel to create a fuel rich environment. The second bed is an oxidation catalyst (reduces CO, VOC, and PM emissions). The Exhaust Gas Recirculation System augments the lean NOx converter. This system recirculates exhaust that has passed through a filter and is cooled before it enters the engine. The cooled exhaust gases have a higher heat capacity than air and contain less oxygen, thereby lowering NOx formation.

Step 2 – Eliminate Technically Infeasible Options

Use of Low Sulfur Fuel: **Feasible.**

Limit Hours of Operation: **Feasible.**

Good Combustion Practices: **Feasible.**

Proper Engine Design: **Feasible.**

Turbocharger and Aftercooler: **Feasible.**

Selective Catalytic Reduction (SCR): **Infeasible.** The SCR system requires long periods of operating time in order for the flue gas to reach a minimum temperature before the system can efficiently operate. Moreover, SCR systems operate efficiently under steady state conditions. Since the emergency diesel generator engines will operate on standby for a maximum of 100 hours per year and under varying loads based on the demand, the operating conditions are not feasible for efficient operation of SCR system. Hence, this control technology is deemed technically infeasible.

Selective Non-Catalytic Reduction (NSCR): **Infeasible.** The exhaust temperature associated with standby diesel generators is below the effective operating range of 1,600 to 2,100°F. Therefore, this control technology is considered as infeasible.

Non-Selective Catalytic Reduction (NSCR): **Infeasible.** NSCR is effective only in stoichiometric or fuel-rich environments where combustion gas is nearly depleted of oxygen. The emergency generators will operate in a lean burn environment, making NSCR infeasible as a NOx control technology.

EMx™: **Infeasible.** For the EMx™ system, the maximum inlet temperature of the catalyst is 700°F. The exhaust temperature of the generators will be in excess of 700°F, rendering EMx™ infeasible as a NOx control technology for these generators.

Fuel Injection Timing Retard: **Infeasible.** Fuel injection timing retard involves derating the engine and reduces the peak power available from the engine, thus impairing the

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availability of peak full power when the generator engine will need to perform at its rated capacity.

Derating Engines: Infeasible. Derating reduces the peak power available from the engine, thus preventing the availability of peak full power when the generator engine will need to perform at its rated capacity. Hence, this technology is considered technically infeasible.

4-way Catalyst Converter with Exhaust Gas Recirculation System: Infeasible. Due to the large load variations typical of standby units, the standby engines are not able to sustain constant steady state loads/exhaust temperatures for sufficient time periods that are critical for high catalyst performance. Hence, this control technology was deemed as technically infeasible for this application.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

SPLNG proposes all feasible control options as BACT.

Step 4 – Evaluate Most Effective Controls

SPLNG proposes all feasible control options as BACT.

Step 5 – Select BACT

Proper engine design, good combustion practices, use of a turbocharger and aftercooler, use of low sulfur fuel, and limiting hours of non-emergency operation for each emergency generator to ≤ 100 hours/year to maintain NO_x emissions at or below the applicable NO_x standard of 40 CFR 60 Subpart IIII are selected as BACT.

SECTION 3.c – BACT for CO Emissions from Emergency Generator Engines

Step 1 – Identify All Control Technologies

1. Oxidation Catalyst;
2. Non-Selective Catalytic Reduction (NSCR);
3. Three-Way Catalyst;
4. Proper Engine Design;
5. Turbocharger and Aftercooler;
6. Good Combustion Practices;
7. 4-way Catalyst Converter with Exhaust Gas Recirculation System;
8. Use of Low Sulfur Fuel; and
9. Limit Hours of Operation.

Step 2 – Eliminate Technically Infeasible Options

Proper Engine Design: Feasible.

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Good Combustion Practices: **Feasible.**

Use of Low Sulfur Fuel: **Feasible.**

Turbocharger and Aftercooler: **Feasible.**

Limit Hours of Operation: **Feasible.**

Oxidation Catalyst: **Infeasible.** Due to the large load variations typical of standby units, the engines are not able to sustain constant steady state loads/exhaust temperatures for sufficient time periods that are critical for high catalyst performance. SPLNG's review did not identify any emergency engines which use this technology. Hence, this control technology is considered technically infeasible.

4-way Catalyst Converter with Exhaust Gas Recirculation System: **Infeasible.**

Recirculating exhaust gases can reduce the power generated by the engine, and the generator engine will need to be able to perform at peak power. Due to the large load variations typical of standby units, the engines are not able to sustain constant steady state loads/exhaust temperatures for sufficient time periods that are critical for high catalyst performance. SPLNG's review did not identify any emergency engines which use this technology. Hence, this control technology is considered technically infeasible

Non-Selective Catalytic Reduction (NSCR): **Infeasible.** NSCR is effective only in stoichiometric or fuel-rich environments where combustion gas is nearly depleted of oxygen. The emergency generators will operate in a lean burn environment, making NSCR infeasible as a NOx control technology.

Three-Way Catalyst: **Infeasible.** Due to the large load variations typical of standby units, the engines are not able to sustain constant steady state loads/exhaust temperatures for sufficient time periods that are critical for high catalyst performance.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

SPLNG proposes all feasible control options as BACT.

Step 4 – Evaluate Most Effective Controls

SPLNG proposes all feasible control options as BACT.

Step 5 – Select BACT

Proper engine design, good combustion practices, use of a turbocharger and aftercooler, use of low sulfur fuel, and limiting hours of non-emergency operation for each emergency generator to \leq 100 hrs/yr to maintain CO emissions at or below the applicable CO standard of 40 CFR 60 Subpart IIII are selected as BACT.

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SECTION 3.d – BACT for VOC Emissions from Emergency Generator Engines

Step 1 – Identify All Control Technologies

1. Use of Low Sulfur Fuel;
2. Proper Engine Design;
3. Oxidation Catalyst;
4. Good Combustion Practices;
5. Turbocharger and Aftercooler;
6. Three-Way Catalyst; and
7. Limit Hours of Operation.

Step 2 – Eliminate Technically Infeasible Options

Good Combustion Practices: **Feasible.**

Proper Engine Design: **Feasible.**

Turbocharger and Aftercooler: **Feasible.**

Use of Low Sulfur Fuel: **Feasible.**

Limit Hours of Operation: **Feasible.**

Oxidation Catalyst: **Infeasible.** This technology is used for steady state continuous operations. The standby diesel generator engines will operate on an intermittent basis with a variable load. Hence, this technology is not conducive for the emergency generator engine operating environment and therefore has been determined to be technically infeasible.

Three-Way Catalyst: **Infeasible.** Due to the large load variations typical of standby units, the engines are not able to sustain constant steady state loads/exhaust temperatures for sufficient time periods that are critical for high catalyst performance.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

SPLNG proposes all feasible control options as BACT.

Step 4 – Evaluate Most Effective Controls

SPLNG proposes all feasible control options as BACT.

Step 5 – Select BACT

Proper engine design, good combustion practices, use of a turbocharger and aftercooler, use of low sulfur fuel, and limiting hours of non-emergency operation for each emergency generator to ≤ 100 hrs/yr to maintain VOC emissions at or below the applicable VOC standard of 40 CFR 60 Subpart IIII are selected as BACT.

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SECTION 3.e – BACT for GHG Emissions from Emergency Generator Engines

Step 1 – Identify All Control Technologies

1. Proper Engine Design;
2. Good Combustion Practices; and
3. Proper O&M Practices.

Step 2 – Eliminate Technically Infeasible Options

Proper Engine Design: Feasible.

Good Combustion Practices: Feasible.

Proper O&M Practices: Feasible.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

SPLNG proposes all feasible control options as BACT.

Step 4 – Evaluate Most Effective Controls

SPLNG proposes all feasible control options as BACT.

Step 5 – Select BACT

Good combustion practices, proper O&M practices, and proper engine design are selected as BACT for GHG emissions from the generator engines.

SECTION 4 – BACT for Emissions from the Ground Flares

The Ground Flares will be utilized to control methane, ethane, and heavier VOC emissions from various processes. The flares will be designed with pressure-assisted burners.

Step 1 – Identify All Control Technologies

1. Minimize Vent Gas to the Flares;
2. Implement Design Standards, Operating Standards, and Applicable Work Standards of 40 CFR 63 Subpart CC or 40 CFR 60 Subpart A; and
3. Use of Natural Gas as Pilot Gas.

Step 2 – Eliminate Technically Infeasible Options

Minimize Vent Gas to the Flares: Feasible.

Implement Design Standards, Operating Standards, and Applicable Work Standards of 40 CFR 63 Subpart CC or 40 CFR 60 Subpart A: Feasible.

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Use of Natural Gas as Pilot Gas: Feasible.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

SPLNG proposes all feasible control options as BACT.

Step 4 – Evaluate Most Effective Controls

SPLNG proposes all feasible control options as BACT.

Step 5 – Select BACT

- Vent gas minimization and implementation of design standards and operating standards are BACT for NO_x emissions.
- Vent gas minimization; use of natural gas as pilot gas; and implementation of design standards, operating standards, and applicable work standards of 40 CFR 63 Subpart CC (for high-pressure operating conditions) or 40 CFR 60 Subpart A (for low-pressure operating conditions) are BACT for CO and VOC.
- Use of low carbon fuel (natural gas) and vent gas minimization are BACT for GHG emissions.

SECTION 5 – BACT for VOC Emissions from Storage Tanks

The proposed Trains 7, 8, and 9 will include a wastewater tank, four amine tanks, and two scavenger tanks (EQT0241 through EQT0247).

Step 1 – Identify All Control Technologies

1. Routing Vapors to a Combustion Control Device;
2. Adsorption System;
3. Internal or External Floating Roof Design;
4. Compliance with NSPS Subpart Kc;
5. Submerged Fill Pipe;
6. Good Maintenance Practices; and
7. White Paint.

Internal Floating Roof

An internal floating roof tank (IFRT) has both a permanent fixed roof and a floating roof inside. The two basic types of IFRTs are an IFRT in which the fixed roof is supported by vertical columns within the tank and an IFRT with a self-supporting fixed roof and no internal support columns. IFRT decks rise/fall with the liquid level in the tank and either float directly on the liquid surface (contact deck) or rest on pontoons above the liquid surface (noncontact deck). Evaporative losses from the tank are minimized with the

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installation of a floating roof; however, emissions can originate from deck fittings, non-welded seams, and the annular space between the deck and wall.

External Floating Roof

An external floating roof tank (EFRT) typically consists of an open-topped cylindrical steel shell equipped with a roof that floats on the stored liquid's surface. Thus, the roof rises/falls with the liquid level in the tank. An EFRT consists of a deck, fittings, and rim seal system. Floating decks currently being utilized are constructed of welded steel plate and classified as either pontoon or double-deck. Evaporative losses from an EFRT are minimized via the floating roof and rim seal system. However, emissions can occur via the rim seal system, deck fittings, and exposed liquid on the tank walls.

Submerged Fill Pipe

During loading of a storage tank, a submerged fill pipe can be utilized to prevent splashing of material loaded. Because the fill pipe opening is submerged below the tank's liquid surface level, liquid turbulence is mitigated during loading, resulting in minimal emissions into the vapor space above the liquid surface. This technology applies to tanks without floating roofs, as floating roof tanks are designed for loading below the liquid surface level.

White Paint

Evaporation losses can be reduced by the condition and color of the tank's shell and roof. The primary factor in evaporative losses is temperature; thus, reducing the temperature of the stored liquid can reduce evaporative losses. Solar radiation will increase the temperature of the liquid in a storage tank, but the extent of the temperature increase is determined by the color and condition of the paint on the tank walls and roof. Paints having a low solar absorptance (i.e., light colored tanks) will absorb less heat than paints with high solar absorptance (i.e., dark colored tanks). White paint is highly reflective and typically used to minimize the tank's ambient temperature, which, in turn, reduces standing losses.

Vapor Combustion Control Device

During tank loading operations, the displaced vapors from the storage tank are directed to a vapor control device (e.g., flare or thermal oxidizer). The stored liquid must have sufficient vapor pressure to force the emission stream through the vent header for subsequent control. Utilizing a vapor combustion device will result in additional criteria pollutants due to products of combustion. This technology can reduce inlet emissions of total VOC by at least 95 percent.

Adsorption System

This control technology reduces VOCs via connection of the fixed roof tank vent to a header, which is routed to the adsorption system. Carbon adsorption systems are typically made up of at least two carbon beds in series. The effectiveness of a carbon adsorption system is chemical dependent and can vary. The control efficiency of the carbon bed

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decreases over time; therefore, once the carbon bed is “spent,” the carbon beds must be switched. The spent carbon must be disposed of as waste or regenerated.

Step 2 – Eliminate Technically Infeasible Options

Adsorption System: Economically infeasible for the amine and scavenger tanks, as proposed VOC potential-to-emit (PTE) from each tank will be insignificant.

Good Maintenance Practices: **Feasible.**

Submerged Fill Pipe: **Feasible.**

Compliance with NSPS Subpart Kc: **Feasible.**

Since VOC emissions from each tank will be insignificant (≤ 0.03 tons/year), other control options would not be practical.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

SPLNG proposes all feasible control options as BACT.

Step 4 – Evaluate Most Effective Controls

SPLNG proposes all feasible control options as BACT.

Step 5 – Select BACT

Controlling VOC emissions using carbon canisters in accordance with 40 CFR 60 Subpart Kc is determined as BACT for VOC emissions from the wastewater tank. Use of submerged fill pipes in combination with good maintenance practices per LAC 33:III.2113 is selected as BACT for VOC emissions from the scavenger tanks and amine tanks.

SECTION 6 – BACT for VOC emissions from Truck Loading Operation

Step 1 – Identify All Control Technologies

1. Routing Vapor to a Control Device;
2. Submerged Fill Loading;
3. Adsorption System;
4. Vapor Balance Service;
5. Good Equipment Design; and
6. Proper Operational Practices.

Routing Vapor to a Control Device

During tank truck loading operations, the displaced vapors from the tank truck are directed to a vapor control device (e.g., flare or thermal oxidizer or vapor combustor unit). The

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stored liquid must have sufficient vapor pressure to force the emission stream through the vent header for subsequent control. Utilizing a vapor combustion device will produce more criteria pollutant emissions. This technology can reduce inlet emissions of total VOC by at least 95 percent.

Submerged Fill Loading

During loading of a tank truck, a submerged fill pipe can be utilized to prevent splashing of the material being loaded. Because the fill pipe opening is submerged below the tank's liquid surface level, liquid turbulence is mitigated during loading, resulting in minimal emissions into the vapor space above the liquid surface.

Vapor Balance Service

In the vapor balance service method, the cargo tank retrieves the vapors displaced during product unloading and transports the vapors back to the storage tank.

Proper Operational Practices

Proper operating practices for normal operations include, but are not limited to, routine inspections of connections and gaskets, pressure testing of the capture system, and timely repairs.

Adsorption System

This control technology reduces VOCs via connection of the fixed roof tank vent to a header, which is routed to the adsorption system. Carbon adsorption systems are typically made up of at least two carbon beds in series. The effectiveness of a carbon adsorption system is chemical dependent and can vary. The control efficiency of the carbon bed decreases over time; therefore, once the carbon bed is "spent," the carbon beds must be switched. The spent carbon must be disposed of as waste or regenerated.

Step 2 – Eliminate Technically Infeasible Options

Submerged Fill Loading: **Feasible.**

Good Equipment Design: **Feasible.**

Proper Operational Practices: **Feasible.**

Routing Vapor to a Control Device: **Infeasible.** Due to the intermittent operation of the wastewater truck loading and the relatively small emissions (VOC \leq 0.55 tons/year), any additional control would be impractical.

Vapor Balance Service: **Infeasible.** Due to the intermittent operation of the wastewater truck loading and the relatively small emissions (VOC \leq 0.55 tons/year), any additional control would be impractical.

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Step 3 – Rank Remaining Control Technologies by Control Effectiveness

SPLNG proposes all feasible control options as BACT.

Step 4 – Evaluate Most Effective Controls

SPLNG proposes all feasible control options as BACT.

Step 5 – Select BACT

Submerged fill and good equipment design and proper operational practices are selected as BACT for VOC emissions.

SECTION 7 – BACT for Fugitive VOC and GHG Emissions

Step 1 – Identify All Control Technologies

Control strategies that can be employed to control fugitive VOC and GHG emissions from piping components (e.g., pumps, valves, connectors, compressor seals, pressure relief devices) include the following:

1. Leakless Component Designs;
2. Leak Management Program;
3. Good Work Practices; and
4. Compliance with LAC 33:III.2111.

Good Work Practices

Development and implementation of good work practices such as Auditory/Visual/Olfactory (AVO) inspections can minimize leaks. AVO is an LDAR monitoring method involving visual inspections and observations (e.g., fluids dripping, spraying, etc. from or around components); sound (e.g., hissing); and smell. If detected, such leaks require immediate repair.

Step 2 – Eliminate Technically Infeasible Options

Good Work Practices: **Feasible.**

Compliance with LAC 33:III.2111: **Feasible.**

Leakless Component Designs: **Infeasible.** Due to the low VOC concentration in fugitive emissions, any add-on controls for fugitive emissions would be impractical.

Leak Management Program: **Infeasible.** Due to the low VOC concentration in fugitive emissions, any add-on controls for fugitive emissions would be impractical.

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Step 3 – Rank Remaining Technically Feasible Control Options

SPLNG proposes all feasible control options as BACT.

Step 4 – Evaluate Most Effective Controls

SPLNG proposes all feasible control options as BACT.

Step 5 – Selection of BACT

Compliance with LAC 33:III.2111 is determined as BACT for VOC, while good work practices such as AVO inspections are selected as BACT for GHG emissions.

SECTION 8 – Collateral Environmental Impacts

The potential of a control option to generate or reduce toxic and hazardous emissions, including compounds not regulated under the Clean Air Act, is considered as part of the environmental impacts analysis (in selecting BACT). According to EPA, a permitting authority should consider the effects of a given control alternative on emissions of toxics or hazardous pollutants not regulated under the Clean Air Act. The ability of a given control alternative to control releases of unregulated toxic or hazardous emissions must be evaluated and may, as appropriate, affect the BACT determination. Conversely, hazardous or toxic emissions resulting from a given control technology should also be considered and may, as appropriate, also affect the BACT determination.

In this case, the selection of selective catalytic reduction (SCR) as BACT for NO_x emissions results in emissions of ammonia. Ammonia is not regulated as a hazardous air pollutant under Section 112 of the Clean Air Act, but it is regulated as a toxic air pollutant (TAP) pursuant to LAC 33:III.Chapter 51, Louisiana’s Comprehensive Toxic Air Pollutant Control Program.⁹ However, the impact of ammonia emissions will be below its ambient air standard (AAS) as set forth in Table 51.2 of LAC 33:III.5112. For this reason, ammonia emissions did not prohibit the selection of SCR as BACT for NO_x.

B. AIR QUALITY ANALYSIS

LAC 33:III.509.M requires an analysis of ambient air quality in the area that a major modification would affect. Such analysis is required for each pollutant for which the source will result in a significant net emissions increase. For the proposed Trains 7 – 9, these pollutants include: particulate matter (PM₁₀ and PM_{2.5}); nitrogen oxides (NO_x); carbon monoxide (CO); volatile organic compounds (VOC); and greenhouse gases (CO_{2e}).

⁹ LAC 33:III.Chapter 51 is not part of Louisiana’s SIP.

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There are no ambient air standards for CO₂e; therefore, this pollutant will not be discussed further in Sections B or C of this Preliminary Determination Summary.

Preconstruction Monitoring

In accordance with LAC 33:III.509.I.5.a, LDEQ may exempt a project from the requirements of LAC 33:III.509.M, with respect to monitoring for a particular pollutant, if the (net) emissions increase would cause, in any area, an air quality impact less than the significant monitoring concentration (SMC) for that pollutant. Preliminary screening indicates that maximum offsite ground level concentrations of PM₁₀, NO₂, and CO from the proposed facility will be less than their respective SMCs. Pre-construction monitoring is not required for any pollutants.

Pollutant	Averaging Period	Modeling Results $\mu\text{g}/\text{m}^3$	SMC ($\mu\text{g}/\text{m}^3$)	Preconstruction monitoring
PM ₁₀	24-hour	3.72	10	Not Required
NO ₂	Annual	1.84	14	Not Required
CO	8-hour	193.66	575	Not Required

Background Concentrations

Existing air quality values, which serve as background concentrations for the source impact analysis required by LAC 33:III.509.K, are as follows:

Pollutant	Averaging Period	Monitor Location	AQS	Distance from Site	Background ($\mu\text{g}/\text{m}^3$)
PM _{2.5}	24-hour	Vinton	22-019-0009	60 km	19
NO ₂	1-hour	Sabine Pass	48-245-0101	3.8 km	48
	Annual	Sabine Pass	48-245-0101	3.8 km	5.2

C. SOURCE IMPACT ANALYSIS

LAC 33:III.509.K.1 requires a demonstration that allowable emissions from the proposed project, including secondary emissions, would not cause or contribute to air pollution in violation of any national ambient air quality standard (NAAQS) in any air quality control region or any applicable maximum allowable increase over the baseline concentration in any area (i.e., ambient air increments).

These analyses were conducted in accordance with the methodology outlined in SPLNG's modeling protocol submitted November 4, 2025.¹⁰

¹⁰ EDMS Doc ID 14995250.

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Preliminary Screening

In order to determine if refined modeling was required, SPLNG first modeled the emissions increases attributed to Trains 7 - 9 using AERMOD.¹¹ As shown in the following table, the preliminary screening indicates that the maximum offsite ground level concentrations of PM_{2.5} (24-hour) and NO₂ (1-hour and annual average) will exceed their respective significant impact levels (SILs); therefore, refined modeling was required for these pollutants.¹²

Pollutant	Averaging Period	Modeling Results (µg/m ³)	SIL (µg/m ³)	AOI (km)	Refined Modeling
PM _{2.5}	24-hour	3.34 (a)	1.2	2.3	Required
	Annual	0.19 (a)	0.2	-	Not Required
PM ₁₀	24-hour	3.72	5	-	Not Required
NO ₂	1-hour	27.69	7.5	21.9	Required
	Annual	1.84	1	1.5	Required
CO	1-hour	438.71	2,000	-	Not Required
	8-hour	193.66	500	-	Not Required
(a) Includes Secondary PM _{2.5} .					

National Ambient Air Quality Standards

SPLNG modeled the emissions from the proposed major modification as well as emissions sources within the area of impact (AOI) of the facility, then added background concentrations as set forth in Section B.

As shown in the table below, refined modeling demonstrates that the maximum offsite ground level concentrations of PM_{2.5} (24-hour) and NO₂ (1-hour and annual averages) comply with the NAAQS at all receptor locations.

Pollutant	Averaging Period	Background (µg/m ³)	Modeling Results (µg/m ³)	Total Impacts (µg/m ³)	NAAQS (µg/m ³)
PM _{2.5}	24-hour	19	3.19 (a)	22.19 (a)	35
NO ₂	1-hour	-	-	155.24	188
	Annual	5.2	10.82	16.02	100
(a) Includes Secondary PM _{2.5} .					

Ozone analysis: The closest hypothetical source to the Sabine Pass LNG Terminal is Central U.S. Domain (CUSD) hypothetical source 20 (i.e., Texas-Harris FIPS # 48201), which is approximately 217 km to the west of the Terminal. SPLNG utilized this hypothetical source for the Modeled Emission Rates for Precursors (MERPs) analysis for ozone. The analysis considered a source with 1000 tons/year of NO_x emissions and 500 tons/year of VOC emissions to estimate the impact of NO_x and VOC emissions from

¹¹ Version 24142

¹² Note that ozone and secondary PM_{2.5} formation are discussed separately below.

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Sabine Pass LNG Terminal on ozone formation. These emission thresholds were compared to the project’s emissions.

Modeled Emission Rates for Precursors (MERPs) Analysis for Ozone			
		NOx	VOC
A	Hypothetical Source Emissions (tons/year)	1000	500
B	Maximum Modeled Concentration (ppb)	1.3522	0.1243
C	Sabine Pass LNG Terminal Emissions (tons/year)	1,847.43	200.53
D	Project Emission Ratio [C/A]	1.8474	0.4051
E	Calculated Project Impact (ppb) [B*D]	2.50	0.05
F	Total Ozone Impact from Sabine Pass LNG Terminal (ppb)	2.55	
G	Background Design Value (ppb) (Setrpsc 40 Sabine Pass, 2022 – 2024)	66	
H	Project Ozone Design Value with the Terminal (ppb) [F+G]	68.55	
	NAAQS (ppb)	70.0	

Secondary PM_{2.5} analysis: SPLNG used a similar analysis to estimate the contribution of NOx and SO₂ to secondary PM_{2.5} formation. The secondary PM_{2.5} impact was added to the preliminary screening and the refined modeling results.

Secondary PM_{2.5} Impact Analysis					
		Daily PM_{2.5}		Annual PM_{2.5}	
		NOx	SO ₂	NOx	SO ₂
A	Hypothetical Source Emissions (tons/year)	1000	500	1000	500
B	Maximum Modeled Concentration (µg/m ³)	0.0829	0.4019	0.0044	0.0096
C	Sabine Pass LNG Terminal Emissions (tons/year)	1,847.43	24.85	1,847.43	24.85
D	Project Emission Ratio [C/A]	1.8474	0.0497	1.8474	0.0497
E	Calculated Project Impact (µg/m ³) [B*D]	0.1531	0.0200	0.0081	0.0005
F	Secondary PM _{2.5} Impact from the Terminal (µg/m ³)	0.173		0.009	
G	Primary Impact Modeling Results (µg/m ³)	3.02		0.18	
H	Monitor Design Value (µg/m ³)	19		NA (a)	
	Total (µg/m ³) [F + G + H]	22.19		0.19	
	NAAQS (µg/m ³)	35		9	

(a) Annual PM_{2.5} passed at SIL; therefore, refined modeling was not performed.

PSD Increments

A PSD increment is the maximum allowable increase in concentration that is allowed to

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occur above a baseline concentration for a pollutant. The baseline concentration is defined for each pollutant (and relevant averaging time) and, in general, is the ambient concentration existing at the time that the first complete PSD permit application affecting the area was submitted (i.e., the minor source baseline date). For PM_{2.5}, this date is October 20, 2010; for NO₂, this date is February 8, 1988. In order to determine the amount of increment consumed, SPLNG obtained baseline inventories from LDEQ’s Emissions Reporting and Inventory Center (ERIC).

As shown in the table below, modeling demonstrates that the Class II increment for PM_{2.5} and NO₂ has not been consumed at any receptor location.

Pollutant	Averaging Period	Rank	Increment Consumption (µg/m ³)	Class II Increment (µg/m ³)
PM _{2.5}	24-hour	2nd High	5.88	9
NO ₂	Annual	1st High	10.82	25

D. ADDITIONAL IMPACT ANALYSES

LAC 33:III.509.O requires an analysis of the impairment to visibility, soils, and vegetation that would occur as a result of the proposed major modification and general commercial, residential, industrial, and other growth associated with the proposed major modification.

Visibility

Near-field visibility analyses are required for any sensitive receptors (state parks, local airports, etc.) that may be located within the proposed project’s daily significant impact area (SIA). The nearest sensitive receptors are the Sabine Pass Battle Ground State Historic Site, which is approximately 2.54 km from the proposed project. The site was selected for visibility impacts. The more distant areas have lesser visibility impacts, thus review of the Sabine Pass Battle Ground State Historic Site has provided a conservative impact assessment that demonstrates compliance at other areas.

Using the Level 1 parameters, the predicted values from the VISCREEN model were greater than the standardized screening values; therefore, the next level (Level 2) analysis was performed. The Level 2 visibility analysis indicated that visibility impacts from the proposed project will not be above the critical screening criteria; thus, further analysis is not necessary.

Soils and Vegetation

The U.S. EPA developed the secondary NAAQS in order to protect certain air quality-related values (i.e., soil and vegetation) that were not sufficiently protected by the primary NAAQS. The secondary NAAQS represent ambient air concentrations below which most types of soil and vegetation are unaffected by criteria pollutants. In general, if ambient air concentrations are found to be less than the secondary NAAQS, emissions from the

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proposed sources will not result in harmful effects to either soil or vegetation.¹³ The maximum modeled ground-level concentrations resulting from the proposed emission sources are compared to the secondary NAAQS to demonstrate insignificant impacts on local soil and vegetation. SPLNG has demonstrated compliance with the secondary NAAQS by complying with the primary NAAQS for PM₁₀, PM_{2.5}, NO₂, and ozone, indicating that the proposed project will not cause or contribute to any adverse impacts on soils, vegetation, and animals.

Commercial, Residential, Industrial, and Other Growth

There will be 225 permanent and up to 2,725 temporary construction jobs created as a result of the proposed project. Because southwestern Louisiana has a large base of skilled workers knowledgeable of industrial processes (due to the number of petrochemical, petroleum refining, manufacturing, electrical generation, and other industries in the area), it is anticipated that majority of the workers will be drawn from the surrounding area. The number of people that permanently relocate to the area in support of the project is expected to be minimal. There is no need for additional housing and infrastructure.

Therefore, the activities associated with the proposed project are not expected to cause significant shift of population or increase in industrial, commercial, and residential growth in the area. Since no significant associated commercial, industrial, or residential growth is expected as a result of the proposed project, negligible growth-related ambient air impacts are expected.

E. ADDITIONAL REQUIREMENTS FOR SOURCES IMPACTING CLASS I AREAS

In accordance with LAC 33:III.509.P, if LDEQ receives a PSD application for a project that “may affect” a Class I area, additional requirements may be imposed on the applicant. The meaning of the term “may affect” is interpreted by EPA policy to include all new major sources and major modifications located within 100 kilometers (km) of a Class I area. However, if emissions from a new major source or major modification located further than 100 km from a Class I area are significant, LDEQ and/or the Federal Land Manager (FLM) can ask the applicant to perform additional analyses to assess the potential impacts of such source or modification on that Class I area.

In order to determine whether a distant source or modification may affect a Class I area, LDEQ uses the Q/d approach. Q/d refers to the ratio of the sum of the net emissions increases of PM₁₀, SO₂, NO_x, and H₂SO₄ (in tons) to the distance (in kilometers) of the facility from the nearest boundary of the Class I area.

¹³ U.S. EPA, Office of Air Quality Planning and Standards, New Source Review Workshop Manual, Research Triangle Park, NC, October 1990.

PRELIMINARY DETERMINATION SUMMARY
Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 - 9
Cameron, Cameron Parish, Louisiana
Agency Interest No.: 119267
PSD-LA-864 – April 28, 2026

$$Q/d = \frac{PM_{10 (NEI)} + SO_2 (NEI) + NO_X (NEI) + H_2SO_4 (NEI)^{14}}{\text{Class I km}}$$

In the case of Sabine Pass LNG Terminal,

$$Q/d = \frac{189.76 + 24.85 + 1847.43 + 0}{452} = 4.56$$

Because Q/d is less than 10, LDEQ has determined that the Trains 7 - 9 will not adversely impact any air quality related value (AQRV) in the Breton National Wildlife Refuge, the nearest Class 1 area.

Note that the emission rates in the above calculation are 24-hour maximums extrapolated to tons per year.

¹⁴ If the project did not trigger a netting analysis, LDEQ inputs the project increase instead (see LAC 33:III.509.A.4). In this case, the value would be less than the pollutant's significance level.

SPECIFIC CONDITIONS

**Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 - 9
Cameron, Cameron Parish, Louisiana
Agency Interest No.: 119267 - PSD-LA-864**

1. The permittee is authorized to operate in conformity with the specifications submitted to the Louisiana Department of Environmental Quality (LDEQ) as analyzed in LDEQ’s document entitled “Preliminary Determination Summary” dated April 28, 2026, subject to the BACT determination listed in Table I, emission limitations set forth in Table IV, and in the following specific conditions. Specifications submitted are contained in the application dated June 24, 2025, as well as additional information dated July 11, August 14, August 21, November 4, and November 22, 2025, and March 23, April 6, April 7, and May 1, 2026.

Unless otherwise noted, the statistical basis for all limitations set forth in Step 5 (Select BACT) of the Preliminary Determination Summary is as follows:

Units	Statistical Basis
lb/hr	Hourly maximum
TPY	Annual maximum
ppm	@ 15% O ₂ , 4-operating hour rolling basis where a CEMS is required.

2. The permittee shall comply with the Louisiana Air Emission Permit General Conditions set forth in LAC 33:III.537.A.

Good Combustion Practices

3. Demonstration of compliance with good combustion practices requires monitoring flue gas oxygen content, combustion air flow, fuel consumption, flue gas temperature, and any additional parameters as recommended by the manufacturer. These parameters shall be maintained within the operating range demonstrated to maintain compliance with applicable emission limitations based on the most recent performance test, or where performance testing has not been performed, within the manufacturer’s recommended operating guidelines.

Storage Vessels

4. The permittee shall monitor and record the throughput of each storage vessel subject to the terms and conditions of this permit during each calendar month. Records shall be retained onsite for 5 years.

Flares

5. During the high-pressure operating periods, the flare shall comply with the following BACT:
 - a. The flare shall be operated with no visible emissions except for periods not to exceed a total of 5 minutes during any 2 consecutive hours and meet 40 CFR 63.670(c) and (h).

SPECIFIC CONDITIONS

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 - 9
Cameron, Cameron Parish, Louisiana
Agency Interest No.: 119267 - PSD-LA-864

- b. Install, operate, calibrate, and maintain a monitoring system capable of continuously measuring calculating and recording the cumulative volumetric flow rates in the flare header or headers that feed the flare, including any supplemental natural gas used with the flare. The flow rate monitoring systems must comply with 40 CFR 63.670(i), as applicable. The monitors shall meet the measurement location, accuracy, and calibration requirements of Table 13 to 40 CFR Part 63 Subpart CC.
 - c. At all times, all monitoring equipment must be operated and maintained in a manner consistent with 40 CFR 63.671(a) and Table 13 of 40 CFR 63 Subpart CC.
 - d. Any monitor downtime must comply with 40 CFR 63.671(a)(4) and 63.671(c). The monitors and analyzers shall operate as required by this condition at least 95% of the time when the flare is operational, averaged over a rolling 12 month period.
 - e. Unless otherwise specified, each measurement taken by the monitoring systems shall comply with 40 CFR 63.671(d).
 - f. Keep records according to 40 CFR 63.655(i)(9)(i) through (x), except for the flare tip velocity and dilution operating limits requirements of § 63.655(i)(9)(vii).
6. High-Pressure Operations: Determine the concentration of individual components and effects of assist media in the flare vent gas using the methods in 40 CFR 63.670(j), (l)(1), (m)(1), and Table 12 and Table 13 of 40 CFR 63 Subpart CC, as applicable. Alternatively, the net heating value of the flare vent gas and hydrogen concentration may be directly monitored following the methods provided in § 63.670(l)(2) - (3), as applicable. Different monitoring methods may be used to determine vent gas composition for different gaseous streams provided the composition or net heating value of all gas streams that contribute to the flare vent gas are determined following the options in this condition. Notwithstanding any contrary part of this condition, for a gas chromatograph or mass spectrometer for compositional analysis for net heating value, the calibration error (CE) of net heating value (NHV) measured versus the cylinder tag value NHV as the measure of agreement for daily calibration and quarterly audits in lieu of determining the compound-specific CE may be used in accordance with § 63.2450(e)(5)(x).

Stack Testing

7. Permittee shall conduct performance tests for emissions from each turbine as follows:
 - a. Conduct initial tests for PM, CO, and VOC emissions within 180 days after initial startup.
 - b. Conduct annual CO and CO₂ emissions tests (plus or minus 2 calendar months).
 - c. Repeat PM and VOC tests every 5 years (plus or minus 6 calendar months).

SPECIFIC CONDITIONS

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 - 9
Cameron, Cameron Parish, Louisiana
Agency Interest No.: 119267 - PSD-LA-864

- d. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A or 40 CFR 51 Appendix M (Method 202):
 - Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources for CO emissions.
 - Method 3A - Determination of Oxygen and Carbon Dioxide Concentrations in Emissions from Stationary Sources (Instrumental Analyzer Procedure).
 - Method 5 – Determination of Particulate Matter Emissions from Stationary Sources for PM emissions.
 - Method 202 – Dry Impinger Method for Determining Condensable Particulate Emissions from Stationary Sources for condensable PM.
 - Method 25A – Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer for VOC.
 - Alternate stack test methods may be used with the prior approval of the Office of Environmental Services.
- 8. Permittee shall comply with the following testing requirements/procedures:
 - a. Provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of emission limits, as required by LAC 33:III.913.
 - b. Submit notification to the Office of Environmental Services at least 30 days prior to a performance test in order to provide LDEQ with the opportunity to conduct a pretest meeting and/or observe the test.
 - c. For the turbines of the exact make and model, a representative subset may be tested in lieu of testing all identical units. A representative subset must contain at least 50 percent of the affected units.
 - d. Submit performance test results to the Office of Environmental Services within 60 days after completion of the test.
- 9. In lieu of annual CO testing, the permittee may continuously monitor and record CO emissions from the turbines using Continuous Emission Monitoring Systems (CEMS). The CEMS shall be calibrated, operated, and maintained according to the manufacturer's specifications and the following requirements:
 - a. CO CEMS shall comply with 40 CFR 60, Appendix B. Performance Specification 4;
 - b. CEMS shall be evaluated in accordance with Procedure 1 of 40 CFR 60 Appendix F; and
 - c. Data availability shall be stipulated by Part 70 General Condition V of LAC 33:III.535.A.

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 - 9
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TABLE I: BACT SELECTIONS

ID No.	PM ₁₀ /PM _{2.5}	NO _x	CO	VOC
Compressor Turbines EQT0208 – EQT0231	Good combustion practices (GCP)	Normal: MRCT: GCP + SCR + DLN Others: GCP + SCR	Normal: GCP & Oxidation catalyst CO <= 5.3 ppm	GCP & Proper equipment design
Mixed Refrigerant Compressor Turbine (EQT0232)	Use of low sulfur fuel	All turbines: NO _x <= 4.5 ppm MSS: GCP @ load > 70%, NO _x <= 25 ppm @ load <= 70%, NO _x <= 96 ppm	MSS: GCP & CO <= 25.0 lb/hr	Use of clean natural gas & oxidation catalyst VOC <= 0.0021 lb/MMBTU
Boil-off Gas Re- compressor Turbine (EQT0233)	GCP Use of low sulfur fuel	Normal: GCP + SCR + DLE NO _x <= 4.5 ppm	Normal: GCP & Oxidation catalyst CO <= 5.3 ppm	GCP & Proper equipment design
Generator Turbines EQT0234 – EQT0236		MSS: GCP	MSS: GCP & CO <= 25.0 lb/hr	Use of clean natural gas & oxidation catalyst VOC <= 0.0021 lb/MMBTU
Thermal Oxidizers EQT0200 - EQT0202	GCP Use of natural gas	GCP & Low-NOx burners	GCP	GCP
Ground Flares EQT0203 – EQT0204	-	Vent gas minimization Implementation of design standards and operating standards	Vent gas minimization; use of natural gas as pilot gas; and implementation of design standards, operating standards, and applicable work standards of 40 CFR 63 Subpart CC (for high-pressure operating conditions) or 40 CFR 60 Subpart A (for low-pressure operating conditions)	
Wastewater Tank EQT0241	-	-	-	Equipped with carbon canisters to comply with 40 CFR 60 Subpart Kc
Amine & Scavenger Tanks EQT0242 – EQT0247	-	-	-	Submerged fill pipes and good maintenance practices per LAC 33:III.2113
Truck Loading EQT0250	-	-	-	Submerged fill loading Good equipment design Proper operational practices
Fugitives FUG0007 – FUG0009	-	-	-	Compliance with LAC 33:III.2111
Emergency Generators EQT0237 – EQT0240	GCP; proper engine design; turbo charger and aftercooler; use of low sulfur fuel			
Non-emergency operation <= 100 hours/year; compliance with 40 CFR 60 Subpart IIII standards				
ppm: ppm @15% O ₂ , 4-operating hour rolling basis				

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 - 9
Cameron, Cameron Parish, Louisiana
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TABLE I: BACT SELECTIONS

ID No.	GHG
Compressor Turbines (EQT0208 – EQT0233) Generator Turbines (EQT0234 – EQT0236) Thermal Oxidizers (EQT0200 - EQT0202)	GCP, use of low carbon fuel, and employment of efficient designs and practices
Emergency Generators (EQT00237 – EQT0240)	GCP, proper engine design, proper O&M practices
Fugitives (FUG0007 – FUG0009)	Good work practices
Ground Flares (EQT0203 – EQT0204)	Vent gas minimization; use of natural gas as pilot gas

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 - 9
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TABLE II: BACT COST SUMMARY

Control Alternatives Capture and Storage Greenhouse Gas	Availability/ Feasibility	Negative Impacts	Control Efficiency (%)	Emissions Reduction (TPY)	Capital Cost (\$MM)	Annualized Cost (\$MM)	Average Cost Effectiveness (\$/ton)	Incremental Cost Effectiveness (\$/ton)
Turbines	Yes/No	1	99.0	4,536,658	5,660.17	1,985.00	437.55	-
Thermal Oxidizers	Yes/No	1	88.3	1,066,968	557.82	195.63	183.35	-
Negative impacts: 1) economic, 2) environmental, 3) energy, 4) safety								

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
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TABLE III: AIR QUALITY ANALYSIS SUMMARY ($\mu\text{g}/\text{m}^3$)

Pollutant	Averaging Period	Total Screening Concentration	Significant Impact Level	Significant Monitoring Concentration	Background	Maximum Modeled Concentration	Modeled + Background Concentration	NAAQS	Modeled PSD Increment Consumption	Allowable Class II PSD Increment
PM _{2.5}	24-hour	3.34 (a)	1.2	-	19	3.19 (a)	22.19 (a)	35	5.88 (a)	9
	Annual	0.19 (a)	0.2	-	-	-	-	9	-	4
PM ₁₀	24-hour	3.72	5	10	-	-	-	150	-	30
	1-hour	27.69	7.5	-	(b)	-	155.24	188	-	-
NO ₂	Annual	1.84	1	14	5.2	10.82	16.02	100	10.82	25
	1-hour	438.71	2000	-	-	-	-	40,000	-	-
CO	8-hour	193.66	500	575	-	-	-	10,000	-	-

(a) Includes secondary PM_{2.5}.

(b) Seasonal background concentrations were include in the model.

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 - 9
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TABLE IV: MAXIMUM ALLOWABLE EMISSIONS RATES

ID No.	Description	Units	PM ₁₀	PM _{2.5}	NO _x	CO	VOC	GHG
EQT0200 – EQT0202	Thermal Oxidizers (each)	lb/hr	0.51	0.51	4.53	5.42	0.93	–
EQT0203 – EQT0204	Ground Flares (each)	lb/hr	-	-	3,889.41	7,535.73	5,681.38	–
EQT0208 – EQT0225	Compressor Turbines (each)	lb/hr	2.02	2.02	BACT	BACT	0.96	–
EQT0226 – EQT0231	Refrigeration Turbine Bypass Stacks (each)							
EQT0232	Mix Refrigerant Compressor Turbine (MRCT)							
EQT0233	Boil-off Gas Re-compressor Turbine (BOGR)	lb/hr	1.65	1.65	BACT	BACT	0.79	–
EQT0234 – EQT0236	Natural Gas-Fired Generator Turbines (each)	lb/hr	1.08	1.08	BACT	BACT	0.52	–
EQT0237 – EQT0240	Standby Diesel Generator Engines (each)	tons/year	BACT	BACT	BACT	BACT	BACT	115
EQT0241	Wastewater Tank	tons/year	–	–	–	–	0.01	–
EQT0242	Amine Storage Tank	tons/year	–	–	–	–	<0.01	–
EQT0243 – EQT0245	Amine Surge Tank Nos. 7, 8, and 9 (each)	tons/year	–	–	–	–	<0.01	–
EQT0246	Scavenger Storage Tank No. 4	tons/year	–	–	–	–	0.03	–
EQT0247	Spent Scavenger Storage Tank No. 4	tons/year	–	–	–	–	0.02	–
EQT0250	Truck Loading Operation – Wastewater No. 2	lb/hr tons/year	– –	– –	– –	– –	25.21 0.55	– –
FUG0007	Fugitive Emissions – Trains 7, 8, and 9	tons/year	–	–	–	–	1.56	3,916
FUG0008	Fugitive Emissions – OLD MACT	tons/year	–	–	–	–	<0.01	4
FUG0009	Fugitive Emissions – Stage 5	tons/year	–	–	–	–	2.06	738
GRP0013	Turbines Cap	tons/year	172.21	172.21	856.10	607.39	82.24	4,581,331
GRP0014	Flares and Thermal Oxidizers Cap	tons/year	6.06	6.06	123.11	198.47	59.81	1,208,740
(BACT) Compliance with BACT limits.								

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL SERVICES**

STATEMENT OF BASIS¹

Proposed Part 70 Operating Permit 3184-V0

**Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 – 9
Cameron, Cameron Parish, Louisiana
Agency Interest (AI) No. 119267 – Activity No. PER20250007**

I. APPLICANT

The applicant is: Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
9243 Gulf Beach Highway
Cameron, LA 70631

Facility: Sabine Pass LNG Terminal

SIC Code: 4925

Location: 9243 Gulf Beach Highway, Cameron, LA

II. PERMITTING AUTHORITY

Louisiana Department of Environmental Quality
Office of Environmental Services
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

III. CONTACT INFORMATION

Mr. Dan Nguyen
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313
Phone: (225) 219-3181

IV. FACILITY BACKGROUND AND CURRENT PERMIT STATUS

The Sabine Pass LNG Terminal consists of the natural gas vaporization operation and natural gas liquefaction Trains 1 through 6. Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC (SPLNG) propose to construct and operate three additional natural gas liquefaction trains (Trains 7, 8, and 9) at the terminal.

V. PROPOSED PERMIT/PROJECT INFORMATION

A permit application dated June 24, 2025, as well as additional information dated July 11, August 14, August 21, November 3, and November 21, 2025, and March 23, and April 6, 2026, was submitted requesting a Part 70 operating permit for natural gas Liquefaction Trains 7, 8, and 9. The application was deemed administratively complete in accordance with LAC 33:III.519.A on July 14, 2025. Pursuant to LAC 33:III.519.A.4, a notice of the completeness determination was published in the *Cameron Parish Pilot*, Cameron, Louisiana, on August 7, 2025.

¹ 40 CFR 70.7(a)(5) and LAC 33:III.531.A.4 require the permitting authority to “provide a statement that sets forth the legal and factual basis for the proposed permit conditions of any permit issued to a Part 70 source, including references to the applicable statutory or regulatory provisions.”

STATEMENT OF BASIS

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 – 9
Agency Interest (AI) No. 119267
Cameron, Cameron Parish, Louisiana
Activity No. PER20250007 – Proposed Permit No. 3184-V0

Process Description and Proposed Project

SPLNG proposes to construct and operate three additional natural gas liquefaction trains (Trains 7, 8, and 9), which will be similar to the six existing trains at the terminal. Various emission sources associated with the existing infrastructure will be used to support the proposed trains. Emissions will be from thermal oxidizers (3), ground flares (2), compressor turbines (20), generator turbines (3), generator engines (4), storage tanks/drums (9), wastewater loading, and fugitives.

VI. ATTAINMENT STATUS OF PARISH

Cameron Parish is designated as attainment for all criteria pollutants.

VII. PERMITTED AIR EMISSIONS

Sources of air emissions are listed on the “Inventories” page of the proposed permit. Estimated emissions of criteria pollutants from the facility, in tons per year (TPY), are as follows:

Pollutant	Emissions
PM ₁₀ /PM _{2.5}	178.39
SO ₂	20.87
NO _x	983.45
CO	808.18
VOC	146.57
GHG (CO ₂ (e))	5,795,189

PM₁₀ and VOC compounds classified as LAC 33:III.Chapter 51-regulated toxic air pollutants (TAP) are speciated below. This list encompasses all Hazardous Air Pollutants (HAP) regulated pursuant to Section 112 of the Clean Air Act. Note, however, all TAPs are not HAPs (e.g., ammonia, hydrogen sulfide).

LAC 33:III.Chapter 51 Regulated Toxic Air Pollutants (tons/year)	
Pollutant	Emissions
1,3 Butadiene	0.029
Acetaldehyde	1.51
Acrolein	0.256
Benzene	1.57
Cumene	0.48
Ethyl Benzene	1.32
Formaldehyde	8.62
n-Hexane	1.86
Hydrogen Sulfide	0.09
Naphthalene (and Methyl-naphthalenes)	0.23

STATEMENT OF BASIS

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 – 9
Agency Interest (AI) No. 119267
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LAC 33:III.Chapter 51 Regulated Toxic Air Pollutants (tons/year)	
Pollutant	Emissions
PAH	0.085
Propylene Oxide	1.08
Toluene	5.28
Xylenes	2.64
Ammonia	533.45
Barium (and compounds)	0.003
Nickel (and compounds)	0.003
Zinc (and compounds)	0.03
Total	558.536

The terminal is a major source of criteria pollutants and HAPs. With the addition of Liquefaction Trains 7, 8, and 9, the Sabine Pass Terminal will become a major source of TAPs pursuant to LAC 33:III.Chapter 51. Therefore, upon the startup of the proposed liquefaction trains, the terminal will be subject to all applicable provisions of LAC 33:III.Chapter 51.

Permitted limits for individual emissions units and groups of emissions units, if applicable, are set forth in the tables of the proposed permit entitled “Emission Rates for Criteria Pollutants and CO₂e” and “Emission Rates for TAP/HAP & Other Pollutants.” These tables are part of the permit.

Emissions calculations can be found in the permit application and the submitted additional information. The calculations address the manufacturer’s specifications, fuel composition (e.g., sulfur content), emissions factors, and other assumptions on which the emissions limitations are based and have been reviewed by the permit writer for accuracy.

General Condition XVII Activities

Very small emissions to the air resulting from routine operations that are predictable, expected, periodic, and quantifiable and that are submitted by the applicant and approved by the Air Permits Division are considered authorized discharges. These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. However, such emissions are considered when determining the facility’s potential to emit for evaluation of applicable requirements. Approved General Condition XVII activities are noted in Section VIII of the proposed permit.

Insignificant Activities

The emissions units or activities listed in Section IX of the proposed permit have been classified as insignificant pursuant to LAC 33:III.501.B.5. By such listing, the LDEQ exempts these sources or types of sources from the requirement to obtain a permit under LAC 33:III.Chapter 5. However, such emissions are considered when determining the facility’s potential to emit for evaluation of applicable requirements.

STATEMENT OF BASIS

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 – 9
Agency Interest (AI) No. 119267
Cameron, Cameron Parish, Louisiana
Activity No. PER20250007 – Proposed Permit No. 3184-V0

VIII. REGULATORY APPLICABILITY

Regulatory applicability is discussed in three sections of the proposed permit: Section X, Section XI, and Specific Requirements. Each is discussed in more detail below.

Section X (Table 1): Applicable Louisiana and Federal Air Quality Requirements

Section X (Table 1) summarizes all applicable federal and state regulations. In the matrix, a “1” represents a regulation applies to the emissions unit. A “1” is also used if the emissions unit is exempt from the emissions standards or control requirements of the regulation, but monitoring, recordkeeping, and/or reporting requirements apply.

A “2” is used to note that the regulation has requirements that would apply to the emissions unit, but the unit is exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified, or reconstructed since the regulation has been effective. If the specific criterion changes, the emissions unit will have to comply with the regulations at a future date. Each “2” entry is explained in Section XI (Table 2).

A “3” signifies that the regulation applies to this general type of source (e.g., furnace, distillation column, boiler, fugitive emissions, etc.), but does not apply to the particular emissions unit. Each “3” entry is explained in Section XI (Table 2).

If blank, the regulation clearly does not apply to this type of emissions unit.

Section XI (Table 2): Explanation for Exemption Status or Non-Applicability of a Source

Section XI (Table 2) of the proposed permit provides explanation for either the exemption status or non-applicability of given federal or state regulation cited by 2 or 3 in the matrix presented in Section X (Table 1).

Specific Requirements

Applicable regulations, as well as any additional monitoring, recordkeeping, and reporting requirements necessary to demonstrate compliance with both the federal and state terms and conditions of the proposed permit, are provided in the “Specific Requirements” section. Any operating limitations (e.g., on hours of operation or throughput) are also set forth in this section. Associated with each Specific Requirement is a citation of the federal or state regulation upon which the authority to include that Specific Requirement is based.

1. **Federal Regulations**

40 CFR 60 – New Source Performance Standards (NSPS)

Equipment at the terminal is subject to 40 CFR 60 Subpart A, Kc, KKKKa, and IIII. Applicable emission standards, monitoring, test methods and procedures, recordkeeping, and reporting requirements are summarized in the “Specific Requirements” section of the proposed permit.

40 CFR 61 – National Emission Standards for Hazardous Air Pollutants (NESHAP)

No NESHAP provisions are applicable to the terminal.

STATEMENT OF BASIS

Sabine Pass LNG, LP and Sabine Pass Liquefaction, LLC
Sabine Pass LNG Terminal – Trains 7 – 9
Agency Interest (AI) No. 119267
Cameron, Cameron Parish, Louisiana
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40 CFR 63 – Maximum Achievable Control Technology (MACT)

The following subparts are applicable at the terminal: A, YYYY and ZZZZ. Applicable emission standards, monitoring, test methods and procedures, recordkeeping, and reporting requirements are summarized in the “Specific Requirements” section of the permit.

Clean Air Act §112(g) or §112(j) – Case-By-Case MACT Determinations

A case-by-case MACT determination pursuant to §112(g) or §112(j) of the Clean Air Act was not required.

40 CFR 64 – Compliance Assurance Monitoring (CAM)

Per 40 CFR 64.2(a), CAM applies to each pollutant-specific emissions unit (PSEU) that 1) is subject to an emission limitation or standard, 2) uses a control devices to achieve compliance, and 3) has potential pre-control device emissions that are equal to or greater than 100 percent of the amount, in TPY, required for a source to be classified as a major source. None of the equipment at the terminal is subject to the CAM.

Acid Rain Program

The Acid Rain Program, 40 CFR Part 72 – 78, applies to the fossil fuel-fired combustion devices listed in Tables 1-3 of 40 CFR 73.10 and other utility units, unless a unit is determined not to be an affected unit pursuant to 40 CFR 72.6(b). LDEQ has incorporated the Acid Rain Program by reference at LAC 33:III.505. The terminal is not subject to the Acid Rain Program.

2. SIP-Approved State Regulations

Applicable state regulations are also noted in Section X (Table 1) of the proposed permit. Some state regulations have been approved by the U.S. Environmental Protection Agency (EPA) as part of Louisiana’s State Implementation Plan (SIP). These regulations are referred to as “SIP-approved” and are enforceable by both LDEQ and EPA. All LAC 33:III.501.C.6 citations are federally enforceable unless otherwise noted.

3. State-Only Regulations

Individual chapters or sections of LAC 33:III noted by an asterisk in Section X (Table 1) are designated “state-only” pursuant to 40 CFR 70.6(b)(2). Terms and conditions of the proposed permit citing these chapters or sections are not SIP-approved and are not subject to the requirements of 40 CFR Part 70. These terms and conditions are enforceable by LDEQ, but not EPA. All conditions not designated as “state-only” are presumed to be federally enforceable.

IX. NEW SOURCE REVIEW (NSR)

1. Prevention of Significant Deterioration (PSD)

The terminal’s source category is not listed in Table A of the definition of “major stationary source” in LAC 33:III.509. As such, the PSD major source threshold is 250 TPY (of any

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regulated NSR pollutant). The proposed Trains 7, 8, and 9 will be a major modification of a major stationary source under the PSD program, LAC 33:III.509.

SPLNG proposes to construct and operate three additional natural gas liquefaction trains (Trains 7, 8, and 9), which will be similar to the six existing trains at the terminal. Various emission sources associated with the existing infrastructure will be used to support the proposed trains. Emissions will be from thermal oxidizers (3), ground flares (2), compressor turbines (20), generator turbines (3), generator engines (4), storage tanks/drums (9), wastewater loading, and fugitives.

Emissions increases from the proposed Trains 7 - 9, in tons per year, are as follows:

Pollutant	Baseline Actual	Post-Project Potential-to-Emit	Project Emissions Increase	Creditable Contemporaneous Change	Net Emissions Increase	PSD SILs	PSD Review?
PM ₁₀	11.84	201.60	189.76	-	189.76	15	Yes
PM _{2.5}	11.84	201.60	189.76	-	189.76	10	Yes
SO ₂	1.66	26.51	24.85	-	24.85	40	No
NO _x	215.67	2,063.10	1,847.43	-	1,847.43	40	Yes
CO	78.51	1,761.01	1,682.50	-	1,682.50	100	Yes
VOC	10.67	211.20	200.53	+ 2.04	202.57	40	Yes
H ₂ S	-	0.10	0.10	-	0.10	10	No
GHG (CO ₂ e)	-	6,942,511	6,942,511	+ 647	6,943,158	75,000	Yes

PM₁₀/PM_{2.5}, NO_x, CO, VOC, and GHG emissions from proposed Trains 7, 8, and 9 will be more than their respective PSD significant levels. PSD review is required for these pollutants. A PSD analysis was performed for PM₁₀/PM_{2.5}, NO_x, CO, VOC, and GHG emissions from proposed Trains 7, 8, and 9 and is documented in Permit PSD-LA-864. Applicable provisions of the PSD permit are incorporated into the Part 70 operating permit.

BACT

Under current PSD regulations, an analysis of “top down” BACT is required for the control of each regulated pollutant emitted from a new major stationary source in excess of the specified significant emission rates. The top down approach to the BACT process involves determining the most stringent control technique available for a similar or identical source. If it can be shown that this level of control is infeasible based on technical, environmental, energy, and/or cost considerations, then it is rejected and the next most stringent level of control is determined and similarly evaluated. This process continues until a control level is arrived at which cannot be eliminated for any technical, environmental, or economic reason. A technically feasible control strategy is one that has been demonstrated to function efficiently on identical or similar processes. Additionally, BACT shall not result in emissions of any pollutant which would exceed any applicable standards of 40 CFR Parts 60, 61, and 63. The following BACTs were selected for affected equipment of the proposed facility:

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ID No.	NO _x	CO	VOC
Compressor Turbines EQT0208 – EQT0231 Mixed Refrigerant Compressor Turbine (EQT0232)	Normal: MRCT: GCP + SCR + DLN Others: GCP + SCR All turbines: NO _x <= 4.5 ppm MSS: GCP @ load > 70%, NO _x <= 25 ppm @ load <= 70%, NO _x <= 96 ppm	Normal: GCP & Oxidation catalyst CO <= 5.3 ppm MSS: GCP CO <= 25.0 lb/hr	GCP & Proper equipment design Use of clean natural gas Oxidation catalyst VOC <= 0.0021 lb/MMBTU
Boil-off Gas Re- compressor Turbine (EQT0233) Generator Turbines EQT0234 – EQT0236	Normal: GCP + SCR + DLE NO _x <= 4.5 ppm MSS: GCP	Normal: GCP & Oxidation catalyst CO <= 5.3 ppm MSS: GCP & CO <= 25.0 lb/hr	GCP & Proper equipment design Use of clean natural gas Oxidation catalyst VOC <= 0.0021 lb/MMBTU
Thermal Oxidizers EQT0200 - EQT0202	GCP & Low-NO _x burners	GCP	GCP
Wastewater Tank EQT0241	-	-	Equipped with carbon canisters to comply with 40 CFR 60 Subpart Kc
Amine Tanks Scavenger Tanks EQT0242 – EQT0247	-	-	Submerged fill pipes and good maintenance practices per LAC 33:III.2113
Truck Loading EQT0250	-	-	Submerged fill loading Good equipment design Proper operational practices
Fugitives FUG0007 – FUG0009	-	-	Compliance with LAC 33:III.2111
Ground Flares EQT0203 – EQT0204	Vent gas minimization Implementation of design standards and operating standards	Vent gas minimization; use of natural gas as pilot gas; and implementation of design standards, operating standards, and applicable work standards of 40 CFR 63 Subpart CC (for high-pressure operating conditions) or 40 CFR 60 Subpart A (for low-pressure operating conditions)	
Emergency Generators EQT00237 – EQT0240	GCP; proper engine design Turbo charger and aftercooler; use of low sulfur fuel Non-emergency operation <= 100 hours/year Compliance with 40 CFR 60 Subpart IIII standards		
ppm: ppm @15% O ₂ , 4-operating hour rolling basis			

ID No.	PM ₁₀ /PM _{2.5}	GHG
Combustion Turbines EQT0208 – EQT0236	GCP Use of low sulfur fuel	GCP, use of low carbon fuel, and employment of efficient designs and practices
Thermal Oxidizers EQT0200 - EQT0202	GCP Use of natural gas	GCP, use of low carbon fuel, and employment of efficient designs and practices
Ground Flares EQT0203 – EQT0204	-	Vent gas minimization; use of natural gas as pilot gas
Fugitives FUG0007 – FUG0009	-	Good work practices

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ID No.	PM ₁₀ /PM _{2.5}	GHG
Emergency Generators EQT00237 – EQT0240	GCP; proper engine design; turbo charger and aftercooler; use of low sulfur fuel Non-emergency operation <= 100 hours/year; compliance with 40 CFR 60 Subpart III standards	GCP, proper engine design, proper O&M practices

A more thorough discussion of the BACT selection process can be found in PSD-LA-864. BACT and any other associated monitoring, recordkeeping, and reporting requirements necessary to determine compliance with the PSD permit are cited as “LAC 33:III.509” in the proposed Title V permit.

Air Quality Impact Analyses

Prevention of Significant Deterioration regulations require an analysis of existing air quality for those pollutants emitted in significant amounts from a proposed new major stationary source. PM₁₀, PM_{2.5}, NO₂, and CO are pollutants of concern in this case.

Modeling was conducted using AERMOD pursuant to the protocol approved by the Office of Environmental Services, Air Permits Division.

Screening Modeling

Pollutant	Averaging Period	Preliminary Screening Concentration (µg/m ³)	Level of Significant Impact (µg/m ³)	Significant Monitoring Concentration (µg/m ³)	Preconstruction Monitoring Required?	Refined Modeling Required?
PM _{2.5}	24-hour	3.34 (a)	1.2	4	No	Yes
	Annual	0.19 (a)	0.2	-	-	No
PM ₁₀	24-hour	3.72	5	10	No	No
NO ₂	1-hour	27.69	7.5	-	-	Yes
	Annual	1.84	1	14	No	Yes
CO	1-hour	438.71	2000	-	-	No
	8-hour	193.66	500	575	No	No

(a) Including secondary PM_{2.5} concentrations

Preliminary screening model indicates that the maximum offsite ground level concentrations of PM_{2.5} (24-hour average) and NO₂ (1-hour and annual averages will exceed their respective significant impact levels (SILs); therefore, refined modeling was required for these pollutants.

Refined Modeling

Pollutant	Averaging Period	Modeled + Background Concentration (µg/m ³)	NAAQS (µg/m ³)	Modeled PSD Increment Consumption (µg/m ³)	Allowable Class II PSD Increment (µg/m ³)
PM _{2.5}	24-hour	22.19	35	5.88	9
NO ₂	1-hour	155.24	188	-	-
	Annual	16.02	100	10.82	25

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As shown above, refined modeling indicates compliance with the NAAQS and PSD Increments.

2. Nonattainment New Source Review (NNSR)

The terminal is located in an attainment for all criteria pollutants; therefore, NNSR does not apply.

3. Notification of Federal Land Managers

The Federal Land Manager (FLM) is responsible for evaluating a facility's projected impact on the Air Quality Related Values (AQRV) (e.g., visibility, sulfur and nitrogen deposition, any special considerations concerning sensitive resources, etc.²) and recommending that LDEQ either approve or disapprove the facility's permit application based on anticipated impacts. The FLM also may suggest changes or conditions on a permit. However, LDEQ makes the final decision on permit issuance. The FLM also advises reviewing agencies and permit applicants about other FLM concerns, identifies AQRV and assessment parameters for permit applicants, and makes ambient monitoring recommendations.

If LDEQ receives a PSD or NNSR permit application for a facility that "may affect" a Class I area, the FLM charged with direct responsibility for managing these lands is notified.

The meaning of the term "may affect" is interpreted by EPA policy to include all major sources or major modifications which propose to locate within 100 kilometers (km) of a Class I area. However, if a major source proposing to locate at a distance greater than 100 km is of such size that LDEQ or the FLM is concerned about potential impacts on a Class I area, LDEQ can ask the applicant to perform an analysis of the source's potential emissions impacts on the Class I area. This is because certain meteorological conditions, or the quantity or type of air emissions from large sources located further than 100 km, may cause adverse impacts. In order to determine whether a source located further than 100 km may affect a Class I area, LDEQ uses the Q/d approach.

Q/d refers to the ratio of the sum of the net emissions increase (in tons) of PM₁₀, SO₂, NO_x, and H₂SO₄ to the distance (in kilometers) of the facility from the nearest boundary of the Class I area.

$$Q/d = \frac{PM_{10(NEI)} + SO_{2(NEI)} + NO_{x(NEI)} + H_2SO_{4(NEI)}^3}{\text{Class I km}}$$

Where:

² See <http://www2.nature.nps.gov/air/Permits/ARIS/AQRV.cfm>.

³ If both NNSR and PSD review are required, the higher of the two "net emissions increase" values has been selected. The net emissions increase for NNSR and PSD purposes may be different due to differing contemporaneous periods. If the net emissions increase of any pollutant is negative, the value used in the equation has been set to zero. If the project did not trigger a netting analysis, LDEQ uses the project increase (see §504.A.3 (NNSR) and §509.A.4 (PSD)). In this case, the value will be less than the pollutant's significance level.

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PM ₁₀ (NEI)	=	net emissions increase of PM ₁₀
SO ₂ (NEI)	=	net emissions increase of SO ₂
NO _X (NEI)	=	net emissions increase of NO _X
H ₂ SO ₄ (NEI)	=	net emissions increase of H ₂ SO ₄
Class I km	=	distance to nearest Class I area (in kilometers)

If Q/d ≥ 4, LDEQ will formally notify the FLM in accordance with LAC 33:III.509.P.1.

In the case of the proposed Liquefaction Trains 7 - 9,

$$Q/d = \frac{189.76 + 24.85 + 1847.43 + 0}{452} = 4.56$$

Because Q/d is less than 10, LDEQ has determined that the proposed Liquefaction Trains 7 - 9 will not adversely impact any air quality related value (AQRV) in the Caney Creek Wilderness Area, the nearest Class 1 area. Notification to the Federal Land Managers is not required.

4. Reasonable Possibility

SO₂ emissions associated with the proposed liquefaction trains did not trigger PSD review. Because SPLNG elected to use “potential to emit” in lieu of “projected actual emissions” to determine the project increase, there is no “reasonable possibility” that the proposed project may result in a significant emissions increase.

X. ADDITIONAL MONITORING AND TESTING REQUIREMENTS

In addition to the monitoring and testing requirements set forth by applicable state and federal regulations (see Section VIII of this Statement of Basis), a number of “LAC 33:III.507.H.1.a” and/or “LAC 33:III.501.C.6” conditions may appear in the “Specific Requirements” section of the proposed permit. These conditions have been added where no applicable regulation exists or where an applicable regulation does not contain sufficient monitoring, recordkeeping, and/or reporting provisions to ensure compliance. LAC 33:III.507.H.1.a provisions, which may include recordkeeping requirements, are intended to fulfill Part 70 periodic monitoring obligations under 40 CFR 70.6(a)(3)(i)(B).

ID	Description	Pollutant	Method	Frequency
	(None)			

XI. OPERATIONAL FLEXIBILITY

Emissions Caps

An emissions cap (or group) is a permitting mechanism to limit allowable emissions of two or more emissions units below their collective potential to emit (PTE). An emission cap was created for the operations of the submerged combustion vaporizers and the turbines. Monthly emissions and total emissions from the capped sources for the last twelve months

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will be calculated monthly. Recordkeeping and reporting are also required. Two emission groups are utilized to provide operational flexibility to the submerged combustion vaporizers, turbines, thermal oxidizers, and flares.

Alternative Operating Scenarios

LAC 33:III.507.G.5 allows the owner or operator to operate under any operating scenario incorporated in the permit. Any reasonably anticipated alternative operating scenarios may be identified by the owner or operator through a permit application and included in the permit. The proposed permit does not include any alternative operating scenarios (AOS).

Streamlined Requirements

When applicable requirements overlap or conflict, the permitting authority may choose to include in the permit the requirement that is determined to be most stringent or protective as detailed in EPA's "White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program" (March 5, 1996). The overall objective is to determine the set of permit terms and conditions that will assure compliance with all applicable requirements for an emissions unit or group of emissions units so as to eliminate redundant or conflicting requirements. The proposed permit does not contain streamlined provisions.

XII. PERMIT SHIELD

A permit shield, as described in 40 CFR 70.6(f) and LAC 33:III.507.I, provides an "enforcement shield" which protects the facility from enforcement action for violations of applicable federal requirements. It is intended to protect the facility from liability for violations if the permit does not accurately reflect an applicable federal or federally enforceable requirement. The proposed permit does not establish a permit shield.

XIII. IMPACTS ON AMBIENT AIR

Modeling demonstrates that impacts of emissions from the proposed liquefaction trains on the Louisiana Ambient Air Standards (LA-AAS) and National Ambient Air Quality Standards (NAAQS) will not be significant. Details are also discussed in Section IX.1 of this Statement of Basis.

Ambient Air Standard (AAS) Modeling (screen)				
Pollutant	Averaging Period	Modeling Results ($\mu\text{g}/\text{m}^3$)	7.5 % AAS ($\mu\text{g}/\text{m}^3$)	AAS ($\mu\text{g}/\text{m}^3$)
Ammonia	8-hour	16.90	48	640
1,3-Butadiene	Annual	0.001	0.07	0.92
Benzene	Annual	0.010	0.90	12

Since the impacts of ammonia, benzene, and 1,3-butadiene were projected (modeled) to be less than 7.5% of the AAS. Refined modeling for these TAPs is not required.

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XIV. COMPLIANCE HISTORY AND CONSENT DECREES

The terminal's compliance history can be found in Section 14a of the permit application. It must be disclosed per LAC 33:III.517.E and 517.D.12, if applicable.

No federal or state actions have been issued since the last permit for the terminal was issued.

XV. REQUIREMENTS THAT HAVE BEEN SATISFIED

There are no requirements that have been satisfied.

XVI. OTHER REQUIREMENTS

Executive Order No. BJ 2008-7 directs all state agencies to administer their regulatory practices, programs, contracts, grants, and all other functions vested in them in a manner consistent with Louisiana's Comprehensive Master Plan for a Sustainable Coast and public interest to the maximum extent possible. If a proposed facility or modification is located in the Coastal Zone, LDEQ requires the applicant to document whether or not a Coastal Use Permit is required, and if so, whether it has been obtained. Coastal Use Permits are issued by the Coastal Management Division of the Louisiana Department of Natural Resources (LDNR).

The facility is located in the Coastal Zone; a Coastal Use Permit was issued for the terminal.

XVII. PUBLIC NOTICE/PUBLIC PARTICIPATION

Written comments, written requests for a public hearing, or written requests for notification of the final decision regarding this permit action may be submitted to:

LDEQ, Public Participation Group
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

Written comments and/or written requests must be received prior to the deadline specified in the public notice. All comments will be considered prior to a final permit decision.

LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The permit application, proposed permit, and this Statement of Basis are available for review at LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, Louisiana. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). Additional copies may be viewed at the local library identified in the public notice. The available information can also be accessed electronically via LDEQ's Electronic Document Management System (EDMS) on LDEQ's public website, www.deq.louisiana.gov.

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Inquiries or requests for additional information regarding this permit action should be directed to the contact identified on page 1 of this Statement of Basis.

Persons wishing to be included on the public notice mailing list or for other public participation-related questions should contact LDEQ's Public Participation Group at P.O. Box 4313, Baton Rouge, LA 70821-4313; by e-mail at maillistrequest@ldeq.org; or contact LDEQ's Customer Service Center at (225) 219-LDEQ (219-5337). Alternatively, individuals may elect to receive public notices via e-mail by subscribing to LDEQ's Public Notification List Service at http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm.

Permit public notices can be viewed at LDEQ's "Public Notices" webpage, <http://www.deq.louisiana.gov/apps/pubNotice/default.asp>. Electronic access to each proposed permit and Statement of Basis current on notice is also available on this page. General information related to public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

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APPENDIX A - ACRONYMS

AAS	Ambient Air Standard (LAC 33:III.Chapter 51)
AP-42	EPA document number of the Compilation of Air Pollutant Emission Factors
BACT	Best Available Control Technology
BTU	British Thermal Units
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CAM	Compliance Assurance Monitoring, 40 CFR 64
CEMS	Continuous Emission Monitoring System
CMS	Continuous Monitoring System
CO	Carbon monoxide
COMS	Continuous Opacity Monitoring System
CFR	Code of Federal Regulations
EI	Emissions Inventory (LAC 33:III.919)
EPA	(United States) Environmental Protection Agency
EIQ	Emission Inventory Questionnaire
ERC	Emission Reduction Credit
FR	Federal Register or Fixed Roof
H ₂ S	Hydrogen sulfide
H ₂ SO ₄	Sulfuric acid
HAP	Hazardous Air Pollutants
Hg	Mercury
HON	Hazardous Organic NESHAP
IBR	Incorporation by Reference
LAER	Lowest Achievable Emission Rate
LDEQ	Louisiana Department of Environmental Quality
M	Thousand
MM	Million
MACT	Maximum Achievable Control Technology
MEK	Methyl ethyl ketone
MIK	Methyl isobutyl ketone
MSDS	Material Safety Data Sheet
MTBE	Methyl tert-butyl ether
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industrial Classification System (replacement to SIC)

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APPENDIX A - ACRONYMS

NESHAP	National Emission Standards for Hazardous Air Pollutants
NMOC	Non-Methane Organic Compounds
NOx	Nitrogen Oxides
NNSR	Nonattainment New Source Review
NSPS	New Source Performance Standards
NSR	New Source Review
OEA	LDEQ Office of Environmental Assessment
OEC	LDEQ Office of Environmental Compliance
OES	LDEQ Office of Environmental Services
PM	Particulate Matter
PM10	Particulate Matter less than 10 microns in nominal diameter
PM2.5	Particulate Matter less than 2.5 microns in nominal diameter
ppm	parts per million
ppmv	parts per million by volume
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
RACT	Reasonably Available Control Technology
RBLC	RACT-BACT-LAER Clearinghouse
RMP	Risk Management Plan (40 CFR 68)
SICC	Standard Industrial Classification Code
SIP	State Implementation Plan
SO2	Sulfur Dioxide
SOCMI	Synthetic Organic Chemical Manufacturing Industry
TAP	Toxic Air Pollutants (LAC 33:III.Chapter 51)
TOC	Total Organic Compounds
TPY	Tons Per Year
TRS	Total Reduced Sulfur
TSP	Total Suspended Particulate
µg/m ³	Micrograms per Cubic Meter
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound
VOL	Volatile Organic Liquid
VRU	Vapor Recovery Unit

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APPENDIX B – GLOSSARY

Best Available Control Technologies (BACT) – an emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this Part (Part III) which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

CAM - Compliance Assurance Monitoring – A federal air regulation under 40 CFR Part 64.

Carbon Monoxide (CO) – (Carbon monoxide) a colorless, odorless gas produced by incomplete combustion of any carbonaceous (gasoline, natural gas, coal, oil, etc.) material.

Cooling Tower – A cooling system used in industry to cool hot water (by partial evaporation) before reusing it as a coolant.

Continuous Emission Monitoring System (CEMS) – The total combined equipment and systems required to continuously determine air contaminants and diluent gas concentrations and/or mass emission rate of a source effluent.

Cyclone – A control device that uses centrifugal force to separate particulate matter from the carrier gas stream.

Federally Enforceable Specific Condition – A federally enforceable specific condition written to limit the potential to Emit (PTE) of a source that is permanent, quantifiable, and practically enforceable. In order to meet these requirements, the draft permit containing the federally enforceable specific condition must be placed on public notice and include the following conditions:

- A clear statement of the operational limitation or condition which limits the source's potential to emit;
- Recordkeeping requirements related to the operational limitation or condition;
- A requirement that these records be made available for inspection by LDEQ personnel;
- A requirement to report for the previous calendar year.

Grandfathered Status – those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

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Lowest Achievable Emission Rate (LAER) – for any source, the more stringent rate of emissions based on the following:

- a. the most stringent emissions limitation that is contained in the implementation plan of any state for such class or category of major stationary source, unless the owner or operator of the proposed stationary source demonstrates that such limitations are not achievable; or
- b. the most stringent emissions limitation that is achieved in practice by such class or category of stationary source. This limitation, when applied to a modification, means the lowest achievable emissions rate for the new or modified emissions units within the stationary source. In no event shall the application of this term permit a proposed new or modified major stationary source to emit any pollutant in excess of the amount allowable under an applicable new source standard of performance.

NESHAP – National Emission Standards for Hazardous Air Pollutants – Air emission standards for specific types of facilities, as outlined in 40 CFR Parts 61 through 63.

Maximum Achievable Control Technology (MACT) – the maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

NSPS – New Source Performance Standards – Air emission standards for specific types of facilities, as outlined in 40 CFR Part 60.

New Source Review (NSR) – a preconstruction review and permitting program applicable to new or modified major stationary sources of criteria air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nonattainment New Source Review (NNSR) – a New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) set forth at 40 CFR Part 50. NNSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

Organic Compound – any compound of carbon and another element. Examples: methane (CH₄), ethane (C₂H₆), carbon disulfide (CS₂).

Part 70 Operating Permit – also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507.

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PM₁₀ – particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – a New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Selective Catalytic Reduction (SCR) – A non-combustion control technology that destroys NO_x by injecting a reducing agent (e.g., ammonia) into the flue gas that, in the presence of a catalyst (e.g., vanadium, titanium, or zeolite), converts NO_x into molecular nitrogen and water.

Sulfur Dioxide (SO₂) – An oxide of sulphur.

TAP – LDEQ acronym for toxic air pollutants regulated under LAC 33 Part III, Chapter 51, Tables 1 through 3.

“Top Down” Approach – An approach which requires use of the most stringent control technology found to be technically feasible and appropriate based on environmental, energy, economic, and cost impacts.

Title V permit – see Part 70 Operating Permit.

Volatile Organic Compound (VOC) – any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the Administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.