Original Project Overview:
Dominion Energy Cove Point LNG, LP (DECP)\(^1\) filed for a CPCN in April 2013 to expand its existing facilities and construct new facilities to enable its liquefied natural gas (LNG) terminal to function on a bi-directional basis (i.e., add export capabilities to its current import capability). The new liquefaction facilities have an LNG production and export capacity of up to 5.75 million metric tons per year of natural gas, and include a new 130 MW combined cycle generating station. The CPCN was issued on May 30, 2014 (Order No.86372). Significant project components include:

- Two Frame 7EA combustion turbines with heat recovery steam generators,
- Two auxiliary boilers,
- One emergency generator,
- Five emergency fire pump engines,
- One thermal oxidizer,
- Two ground flares, North Flare and South Flare,
- Two existing GE Frame 5 combustion turbines to provide a maximum of 25 MW,
- Piping and equipment components, and
- Eight storage vessels for propane, ethane, and condensate.

Site Description
The new liquefaction facility is under construction on 59.5 acres within the fenced area of the 131-acre operating industrial area and will tie in to the existing LNG export facility. Two nearby areas in Calvert County, Offsite Areas A and B, were used for temporary construction laydown and parking areas for the Project. The addition of the new liquefaction facility brought DECP’s total on-site nameplate generating capacity to 210.9 MW. However, all generating units are used exclusively to produce on-site electricity, with no electric power exported to the grid.

Original Project – Significant Impact and Mitigation Highlights

Air Impacts and Mitigation
- Potential emissions from the Project triggered Prevention of Significant Deterioration (PSD) requirements for NO\(_x\), CO, particulate matter, PM10, PM2.5, VOC, and greenhouse gases. Calvert County is designated as a marginal nonattainment area for ozone, so nonattainment new source review requirements were triggered for NO\(_x\) and VOC.
- DECP agreed to implement best available control technology and comply with lowest achievable emission rate limits, including 12-month rolling emission limits, on individual emission sources and on a project-wide basis.

Biological Impacts and Mitigation
- Mitigation of tree loss in Offsite Area A by:
  - Preserving 13.5 acres of Forest Retention Area above county requirements in Offsite Area A,
  - Preservation of 88.8 forested acres on another nearby land parcel,
  - Purchase of two additional Preservation Sites totaling 36 acres, and
  - Tree planting at sites within Calvert County totaling 15 acres.

\(^1\) At the time of application filing in 2013, the name of the corporate entity seeking the CPCN was Dominion Cove Point.
• Preparation and implementation of an Oyster Mitigation Plan for Offsite Area B including a minimum of 4 acres of mitigation.
• Preparation and implementation of an Artificial Reef Management Plan that includes the use of the barge pier and concrete foundations removed from the terminal site as artificial reef components.
• Subsidence monitoring in and near Calvert County to confirm that no statistically significant indication of land subsidence occurs as a result of the Project.

**Socioeconomic Impacts and Mitigation**

• Development and implementation of a landscaping plan to address visibility of the proposed sound barrier from Cove Point Road in the vicinity of the site entrance.
• DECP contributions to the Maryland Energy Assistance Program and Maryland Strategic Energy Investment Fund.

**CPCN Amendment Request**

In August 2017, DECP filed a request to amend certain conditions of its existing CPCN to remove an unnecessary VOC numeric limit, and to allow for operating flexibility to maintain reliability of the Project. Specifically, DECP is requesting the following revisions to the CPCN:

- Removal of the VOC numeric limit in Condition A-IX-3 for piping and equipment components.
  - DECP states that it is infeasible to apply a measurement methodology to piping and equipment components. In addition to the numeric limit, the CPCN also requires DECP to implement a stringent leak detection and repair (LDAR) monitoring program for all piping equipment and components. DECP states that eliminating the VOC numeric limit will not alter how the Project is operated, leaks will be identified and repaired per the LDAR monitoring program. DECP believes that implementation of a work practice standard such as an LDAR monitoring program is sufficient to meet the nonattainment new source review requirements for VOC emissions from piping and equipment components, and a numeric limit is unnecessary.

- Decrease the project-wide VOC emission limit in Condition A-III-4 to reflect the removal of the piping and equipment component VOC numeric limit.

- Revise Condition A-I-3(g) to allow for the use of the existing three GE Frame 3 and Solar Titan combustion turbines to supply power for the project as an alternative to the new GE Frame 5 combustion turbines approved as part of the CPCN in 2014.
  - The GE Frame 3 and Solar Titan combustion turbines are currently used by the existing LNG export facility. This change would provide DECP with the operational flexibility to utilize them to supply up to 25 MW of power to the liquefaction facility on an as needed basis if the GE Frame 5 combustion turbines are unavailable.
  - DECP is not requesting any increase in emission limits for this revision, even though the GE Frame 3 and Solar Titan combustion turbines have higher hourly emission rates than the GE Frame 5 combustion turbines. Operation of the GE Frame 3 and Solar Titan combustion turbines would be restricted, as necessary, to meet the project-wide emission limits.

As part of this amendment request, DECP also provided updated emissions inventories, toxic air pollutant analyses, and air dispersion modeling analyses that reflect as-built changes to emission source parameters, emission source and building locations, and building dimensions. These updated analyses also reflect the requested changes to the conditions as detailed above. The update emissions inventories were provided by DECP to demonstrate that the inclusion of the as-built and requested changes does not require an increase to any emission limit in the current CPCN. DECP provided the updated toxic air pollutant and air dispersion modeling analyses to demonstrate that the as-built and requested changes will not impact ambient air quality.

DECP is also requesting expedited consideration of the proposed amendment to the CPCN, as commercial operations are anticipated to commence in December 2017. Therefore, DECP is seeking a final order by November 15, 2017.

**CPCN Amendment Request Status**

- CPCN Amendment Request filed 8/10/17.
- MDE-ARMA and PPRP are currently reviewing the CPCN Amendment Request.
- For more current information, see: [http://www.psc.state.md.us/](http://www.psc.state.md.us/)