Message

From: Mills, Flaire [Mills.Flaire@epa.gov]
Sent: 3/1/2019 8:18:54 PM
To: Lyon, Christopher [lyon.christopher@epa.gov]; Lopez, Peter [lopez.peter@epa.gov]
Subject: Limetree Bay weekly update

Chris:

Here's this week's update, approved by many people and polished to reflect that there are three organizations (Limetree Bay – the parent and its children Limetree Bay Terminals (LBT) and Limetree Bay Refining (LBR)). Rob Tomiak wanted me to have you take a look before it goes.

Limetree Bay, St. Croix project update 3/1/19

Administrator Update: In a biweekly call with Limetree Bay, EPA made it clear that the company's requested end of June issue date for the PAL permits was not possible given that the back end of the permitting process, if there were no substantive comments, would take close to four months, which in itself would bring us to the end of June, providing little time for review of the extensive permit applications. While R2, in consultation with OAR and OGC, is doing everything possible to expedite processing the permit, there remains a broad gap between a realistic timeline for completion and the company's request.

Update on Current EPA Actions:

- Enforcement/Investigatory / Ex. 7(a)

- **PAL:** In a biweekly call with Limetree Bay, EPA made it clear that the company's requested end of June issue date for the PAL permits was not possible, given that the back end of the permitting process, if there were no substantive comments, would take close to four months, which in itself would bring us to the end of June, providing little time for review of the extensive permit applications. While R2, in consultation with OAR and OGC, is doing everything possible to expedite processing the permit, there remains a broad gap between a realistic timeline for completion and the company's request.

- **Most Significant Non-EPA Update:** On February 12, 2019, the NMFS provided the USACE its biological opinion. On February 22, 2019, the USACE issued the 404 permit for the Single Platform Mooring (SPM). Limetree Bay indicated that they have already begun construction.