To: Robinson, Jeffrey[Robinson.Jeffrey@epa.gov]; Jones, Bruced[Jones.Bruced@epa.gov]; Magee, Melanie[Magee.Melanie@epa.gov]; Donaldson, Guy[Donaldson.Guy@epa.gov]
From: Lawrence, Rob
Sent: Wed 1/10/2018 4:48:00 PM
Subject: FW: Louisiana Offshore Oil Port (LOOP) - Oil Bi-Directional Proposal - more from Coast Guard on air status
LOOP - OPIS Article - LA Bucket Brigade.docx
LOOP - OPIS Article - LA Bucket Brigade - LOOP Talking Points (9Jan18).pdf

Rob Lawrence
Region 6
Policy Advisor - Energy Issues
214.665.6580

-----Original Message-----
From: Borland, Curtis [mailto:Curtis.E.Borland@uscg.mil]
Sent: Tuesday, January 09, 2018 11:55 AM
To: Lawrence, Rob <Lawrence.Rob@epa.gov>; Fields, Yvette (MARAD) <Yvette.Fields@dot.gov>
Cc: Threet, Daron (MARAD) <daron.threet@dot.gov>; Morefield, Wade (MARAD) <wade.morefield@dot.gov>; Bachman, Roddy C CIV <Roddy.C.Bachman@uscg.mil>; Shepherd II, Thomas (MARAD) <thomas.shepherd@dot.gov>; McKitrick, Bradley CIV <Bradley.K.McKitrick@uscg.mil>; Perez, Jose A CDR <Jose.A.Perez3@uscg.mil>; Kelly, Scott J CAPT <Scott.J.Kelly@uscg.mil>; Massimi, Elizabeth L CDR <Elizabeth.L.Massimi@uscg.mil>; t.j.broussard@bsee.gov
Subject: RE: Louisiana Offshore Oil Port (LOOP) - Oil Bi-Directional Proposal

Good afternoon All,

Related to tomorrow's discussion is the attached which I received from LOOP's counsel, Mr. Gordon Arbuckle. In short, the word document is an article which expresses a Louisiana based NGO's opposition to LOOP's plan, primarily due to lack of vapor recovery systems onboard the marine terminal. The .pdf is LOOP's talking points paper which purports to rebut the article and reiterates LOOP's position that it is an OCS source, the emissions from which are regulated by the Department of the Interior.

Please take a quick read as it further informs our discussion tomorrow.

All the best,

Curtis

Curtis E. Borland
Attorney/Advisor
Commandant (CG-OES-2)
Vessel & Facility Operating Standards
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-----Original Message-----
From: Lawrence, Rob [mailto:Lawrence.Rob@epa.gov]
Sent: Monday, January 08, 2018 5:51 PM
To: Fields, Yvette (MARAD)
Cc: Threet, Daron (MARAD); Morefield, Wade (MARAD); Borland, Curtis; Bachman, Roddy C CIV; Shepherd II, Thomas (MARAD); McKitrick, Bradley CIV
Subject: [Non-DoD Source] RE: Louisiana Offshore Oil Port (LOOP) - Oil Bi-Directional Proposal

Yvette - I wanted to give you a revision that includes the Clean Air Act information.

Rob Lawrence

Region 6

Policy Advisor - Energy Issues

214.665.6580

From: Fields, Yvette (MARAD) [mailto:Yvette.Fields@dot.gov]
Sent: Thursday, December 21, 2017 9:44 AM
To: Lawrence, Rob <Lawrence.Rob@epa.gov>
Cc: Threet, Daron (MARAD) <daron.threet@dot.gov>; Morefield, Wade (MARAD) <wade.morefield@dot.gov>; Curtis.E.Borland@uscg.mil; Bachman, Roddy C CIV <Roddy.C.Bachman@uscg.mil>; Shepherd II, Thomas (MARAD) <thomas.shepherd@dot.gov>; McKitrick, Bradley CIV <bradley.k.mckitrick@uscg.mil>
Subject: RE: Louisiana Offshore Oil Port (LOOP) - Oil Bi-Directional Proposal

Thanks Rob!

I need to confer with my team as well as the Coast Guard team. We will be in touch with you after the Holidays!

All the Best!

Yvette

Yvette M. Fields

Director, Office of Deepwater Ports and Port Conveyance

U.S. Department of Transportation

Maritime Administration

1200 New Jersey Avenue, SE, W21-310

Washington, DC 20590

(202) 366-0926 (Office)

(202) 366-5123 (Fax)

From: Lawrence, Rob [mailto:Lawrence.Rob@epa.gov]
Sent: Thursday, December 21, 2017 10:28 AM
To: Fields, Yvette (MARAD) <Yvette.Fields@dot.gov>
Subject: FW: Louisiana Offshore Oil Port (LOOP) - Oil Bi-Directional Proposal

Yvette - this is the NPDES permit update. We have not had any communication on the bi-directional proposal or any permit amendment for that concept.

Rob Lawrence

Region 6

Policy Advisor - Energy Issues

214.665.6580

From: Shaikh, Taimur
Sent: Tuesday, December 19, 2017 11:04 AM
To: Lawrence, Rob <Lawrence.Rob@epa.gov>; Schwab, Kay <Schwab.Kay@epa.gov>; Dwyer, Stacey <Dwyer.Stacey@epa.gov>
Cc: Chen, Isaac <Chen.Isaac@epa.gov>; Bogdan, Silvia <bogdan.silvia@epa.gov>
Subject: RE: Louisiana Offshore Oil Port (LOOP) - Oil Bi-Directional Proposal

Hi Rob,

We have updated the spreadsheet. Please let me know if you need anything further.

Thanks.

Taim.

Taimur A. Shaikh, Ph.D.

Acting Section Chief | NPDES Management Section (6WQ-PO)

Home Section | Assessment, Listing, and TMDL Section (6WQ-PT)

Water Division | EPA Region 6

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From: Lawrence, Rob
Sent: Tuesday, December 19, 2017 8:48 AM
To: Shaikh, Taimur <Shaikh.Taimur@epa.gov>; Schwab, Kay <Schwab.Kay@epa.gov>
Subject: FW: Louisiana Offshore Oil Port (LOOP) - Oil Bi-Directional Proposal

Can you complete the chart as it pertains to the LOOP existing NPDES permit? Thanks!

Rob Lawrence

Region 6

Policy Advisor - Energy Issues

214.665.6580

From: Fields, Yvette (MARAD) [mailto:Yvette.Fields@dot.gov]
Sent: Monday, December 18, 2017 3:17 PM
To: Borland, Curtis <Curtis.E.Borland@uscg.mil>; Morefield, Wade (MARAD) <wade.morefield@dot.gov>; terri.thomas@boem.gov; t.j.broussard@bsee.gov <mailto:t.j.broussard@bsee.gov> ; Jarvis Abbott <Jarvis.Abbott@bsee.gov>; Lawrence, Rob <Lawrence.Rob@epa.gov>; Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>; michael.tucker@noaa.gov; Giordano, Alfred (PHMSA) <alfred.giordano@dot.gov>; Massimi, Elizabeth L CDR <Elizabeth.L.Massimi@uscg.mil>; Youde, Steven M LCDR <Steven.M.Youde@uscg.mil>; Bachman, Roddy C CIV <Roddy.C.Bachman@uscg.mil>; McKitrick, Bradley CIV <Bradley.K.McKitrick@uscg.mil>; Perez, Jose A CDR <Jose.A.Perez3@uscg.mil>; Perera, Melissa E CIV <Melissa.E.Perera@uscg.mil>; Tone, Kevin P CIV <Kevin.P.Tone@uscg.mil>; Threet, Daron (MARAD) <daron.threet@dot.gov>; Vasanth, Pavagada N CIV <Pavagada.N.Vasanth@uscg.mil>; Pucci, Michael (MARAD)

<Michael.Pucci@dot.gov>; Shepherd II, Thomas (MARAD) <thomas.shepherd@dot.gov>; Gilson, Kristine (MARAD) <kristine.gilson@dot.gov>; Brand, Lauren (MARAD) <lauren.brand@dot.gov>; Carter, Michael (MARAD) <Michael.Carter@dot.gov>; Brennan, Bernadette (MARAD) <bernadette.brennan@dot.gov>
Subject: RE: Louisiana Offshore Oil Port (LOOP) - Oil Bi-Directional Proposal

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PRE-DECISIONAL; DO NOT RELEASE UNDER FOIA

Dear Agency Representatives,

This is a follow-up to the interagency call on December 7, 2017, regarding the pending LOOP Oil Bi-Directional proposal.

During the call, several agency representatives raised significant concerns regarding:

1. The sufficiency of the Environmental Assessment submitted with LOOP's proposal to U.S. Coast Guard in November 2017;
2. The incomplete listing of Federal and State permits required for the current operation of the LOOP facility;
3. LOOP's assertion that it is not required to obtain a permit for air emissions from its marine terminal under Title V of the Clean Air Act and that LOOP's operations at its offshore facility are regulated under the Department of Interior's Outer Continental Shelf air quality program;
4. The ongoing dispute over environmental monitoring requirements at outfalls regulated pursuant to LOOP's NPDES permit;
5. LOOP's lack of notice of the proposed oil export operational changes to the regulatory agencies under LOOP's current permits;
6. PHMSA's outstanding requests for information to LOOP pertaining to pipeline modification and surge protection necessary for the Oil Export proposal; and
7. Obligations regarding any threatened or endangered species and/or marine mammals in the area of LOOP's facility.

Please be advised that the Maritime Administration is conducting due diligence to ensure that LOOP maintains full compliance with the provisions of its deepwater port license for the operation of its facility. As such, MARAD hereby requests written confirmation from each of your agencies on the status of all Federal permits your respective agencies require for onshore and offshore operations of LOOP's deepwater port facility, and any obligations under the Endangered Species Act or Marine Mammal Protection Act in regard to LOOP's current operations and its pending Oil Bi-Directional proposal.

We ask that your responses include the relevant authorizing law(s) for which your agency maintains jurisdiction, the dates of permit issuance and expiration, and the status of any related pending permitting actions. For this purpose, attached is a chart for you to complete and return to MARAD for review.

We would greatly appreciate your prompt responses by December 29, 2017.

Should you have any questions or concerns regarding this request, please feel free to contact Ms. Yvette Fields, Director, Office of Deepwater Ports and Port Conveyance at 202-366-0926 or by email at Yvette.fields@dot.gov.

Regards,

Yvette M. Fields

Director, Office of Deepwater Ports and Port Conveyance

U.S. Department of Transportation

Maritime Administration

1200 New Jersey Avenue, SE, W21-310

Washington, DC 20590

(202) 366-0926 (Office)

(202) 366-5123 (Fax)

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PRE-DECISIONAL; DO NOT RELEASE UNDER FOIA

-----Original Appointment-----
From: Borland, Curtis [mailto:Curtis.E.Borland@uscg.mil]
Sent: Tuesday, November 28, 2017 1:33 PM
To: Borland, Curtis; Fields, Yvette (MARAD); Morefield, Wade (MARAD); terri.thomas@boem.gov <mailto:terri.thomas@boem.gov> ; t.j.broussard@bsee.gov; Jarvis Abbott; 'Lawrence, Rob'; robinson.jeffrey@epa.gov; michael.tucker@noaa.gov <mailto:michael.tucker@noaa.gov> ; Giordano, Alfred (PHMSA); Massimi, Elizabeth L CDR; Youde, Steven M LCDR; Bachman, Roddy C CIV; McKitrick, Bradley CIV; Perez, Jose A CDR; Perera, Melissa E CIV; Tone, Kevin P CIV; Vasanth, Pavagada N CIV; Pucci, Michael (MARAD); Shepherd II, Thomas (MARAD); Gilson, Kristine (MARAD)
Cc: Brennan, Bernadette (MARAD)

Subject: Louisiana Offshore Oil Port (LOOP) - Oil Export Proposal
When: Thursday, December 07, 2017 2:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Teleconference

When: Thursday, December 07, 2017 2:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: Teleconference

Note: The GMT offset above does not reflect daylight saving time adjustments.

~~*~*~*~*~*~*~*~*

Good afternoon All,

Recently, I asked LOOP to provide supplemental information on their main oil line conversion Environmental Impact Assessment. Attached is LOOP's response (with attachments). While I encourage all to review before our call on Thursday, I am particularly interested in EPA's and BSEE/BOEM's view regarding LOOP's conclusion that "EPA has no jurisdiction over the [offshore] terminal or operations which take place there." (See Air Emissions Regulatory Authority Determination.pdf, Page 1 - Summary of Conclusions).

Good afternoon All,

After some sorting out of schedules, it appears we have critical mass to hold a teleconference on the subject issue. Date: Thursday, December 7; Time: 1400 - 1500 Eastern/1300 - 1400 Central.

Attached is my original email with a brief list of agenda items and two attachments: 1) LOOP's Environmental Impact Analysis of the conversion of its main oil line to bi-directional flow, and 2) A LOOP prepared project description. Both documents should be considered to contain business confidential information and not be sent to other parties outside of your Agency. Determinations of releasability will be made by the Coast Guard in consultation with LOOP. Please feel free to forward this invitation to others in your Agency who may have an interest.

Call-in information: (202) 475-4000

Passcode: 56155997#

I will energize the circuit five minutes before the start time.

All the best,

Curtis Borland

Attorney/Advisor

U.S. Coast Guard Headquarters

Office of Operating & Environmental Standards - Maritime International Law

(202) 372-1444