**To:** Robinson, Jeffrey[Robinson.Jeffrey@epa.gov]
**From:** Jeffrey Robinson
**Sent:** Mon 3/5/2018 2:21:10 PM
**Subject:** Fw: LOOP Referral
EPA_PERMIT.wpd
EPA_FACTSHEET.wpd

----- Forwarded by Jeffrey Robinson/R6/USEPA/US on 03/05/2018 08:21 AM -----

From: David Garcia/R6/USEPA/US
To: Jeffrey Robinson/R6/USEPA/US@EPA,
Cc: Esteban Herrera/R6/USEPA/US@EPA, Stephanie Kordzi/R6/USEPA/US@EPA, Steve Thompson/R6/USEPA/US@EPA
Date: 10/14/2008 07:26 AM
Subject: Re: LOOP Referral

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Thanks Jeff, We need to first check if we have authority to enforce 35 miles off shore. Haven't you all issued permits to such sites.? What is your range (off shore) of Part 71 authority.? I assume this facility did not submit a permit application to you all.

David F. Garcia,
Air/Toxics Inspection and Coordination Branch
Associate Director
USEPA, Region 6
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Jeffrey Robinson/R6/USEPA/US

To: David Garcia/R6/USEPA/US@EPA, Steve Thompson/R6/USEPA/US@EPA, Esteban Herrera/R6/USEPA/US@EPA

**Jeffrey Robinson/R6/USEPA/US**

cc: Stephanie Kordzi/R6/USEPA/US@EPA

10/14/2008 07:03 AM

Subject: LOOP Referral

Air Enforcement:

We have recently been speaking with a future air permit applicant, the Texas Offshore Port System which will be located appx. 35 miles off the the Texas coast near Freeport, TX. In our discussions with them, we have become aware of a similar operation, the Louisiana Offshore Oil Port (LOOP), which began operations in the mid 70s. It appears that this facility is operating without an air permit. At the time EPA issued the initial water permit, there was no determination made that the facility needed to apply for an air permit. Please let us know if you are aware of any applicability determiantion being performed for the LOOP project.

We recommend that EPA Air Enforcement review this case and make a determination whether this facility is subject to the provisions of the Clean Air Act and thus be required to submit an air permit application to EPA. The facility did receive a National Pollutant Discharge Elimination System (NPDES) permit (see attachments below).

Louisiana Offshore Oil Port (LOOP) - Description of project (from NPDES permit).

*Applicant Activity - According to the application, LOOP LLC, Deepwater Port Complex, operates an offshore petroleum offloading terminal and onshore pipeline and storage facilities for the transporation of crude oil. Crude oil is offloaded from supertankers at the port and transported via pipeline to the Clovelly Dome Storage Terminal Facility (CDSTF) and the Clovelly Tank Facility (CTF). These storage facilities provide interim storage for crude oil before it is delivered via pipelines to refineries. The CDSTF uses brine, stored in a 280-acre Brine Storage Reservoir, to displace crude oil from the caverns for injection into the pipelines. LOOP also operates the Small Boat Harbor facility, the Fourchon Booster Station, and the Operations Center and Warehouse in support of the activities at the facility.*

For your information and reference, I am attaching the NPDES permit and NPDES Statement of Basis which contains contact and location information for the facility.

*(See attached file: EPA_PERMIT.wpd)(See attached file: EPA_FACTSHEET.wpd)*