Message

From: Lawrence, Rob [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22505B64AEE401EBA1A31E9B50F61D1-LAWRENCE, ROB]
Sent: 7/10/2018 3:16:51 PM
To: Trice, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=11903769650445ea9efc62642e026be4-Jtrice02]; Alvarado, Tina [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=127c8af0454f431b9ffdc40c1dd13f87-Arnold, Tina]
Subject: RE: TX Gulf Terminal Inc

It looks like this write-up came out of OAR. Texas Gulf Terminals is a very simple system with one buoy. But we will be also issuing NPDES permits for parts of the system. Since the MOU between TCEQ and RRC places these types of onshore facilities (tank farm and pipelines) within RRC state authority and RRC does not have NPDES delegation, the Region will be covering the construction stormwater and hydrostatic test water discharges for the tanks and pipelines. It is unclear if the ballast water discharges from the carriers while at the buoy need to be permitted or might be covered by the general vessel permit.

The MARAD/USCG will be doing a NEPA compliance document and consult as appropriate. The scope of the action hopefully will go back upstream through the tank farm, but that has not been stated to me.

If we want to discuss the LOOP meeting, we probably should do it today as I think Tina is traveling later this week for our tribal meeting in Albuquerque.

Rob Lawrence
Region 6
Policy Advisor - Energy Issues
214.665.6580

From: Trice, Jessica
Sent: Tuesday, July 10, 2018 8:15 AM
To: Alvarado, Tina <Alvarado.Tina@epa.gov>; Lawrence, Rob <Lawrence.Rob@epa.gov>
Subject: TX Gulf Terminal Inc

Good Morning Rob and Tina,

I saw the following write-up below went in last week's report up the HQ senior leadership. I assume, based on the write-up, that there may not be an associated EPA issued NPDES permit for this facility and perhaps the discharges are in state waters only? Just trying to confirm if we have an NEPA compliance action for this or not – or maybe we don't know at this point.

Texas Gulf Terminal Inc., Texas
Texas Gulf Terminal Inc. has informed Region 6 that it intends to file its Deepwater Port Act (DPA) license application with MARAD/Coast Guard by July 9. Simultaneously, on July 9 Texas Gulf Terminal will file with EPA Region 6 a PSD permit application, title V operating permit application, and a CAA Section 112(g) case-by-case MACT determination request. For a license application to be considered complete, the DPA requires that all necessary permit applications to both Federal and State agencies be filed. From receipt of permit applications, EPA has 21 days to determine if the information is sufficient for MARAD/Coast Guard to prepare a notice of intent to begin the EIS process.

Also, when you have time in the near future, perhaps we can chat about the discussion with the LOOP representatives. I am interested in the information that they provided to us based on our request and the next steps/timeline for completing the NEPA analysis.

Thanks,

Jessica Trice
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