APPENDIX E

RESPONSES TO ENVIRONMENTAL IMPACT QUESTIONNAIRE

In accordance with LAC 33:IX.303.F1-5, LOOP provides the following responses.

1.0 LAC 33:IX.303.F.1.

"Have the potential and real adverse environmental effects of the proposed facility been avoided to the maximum extent possible?"

Yes. The real adverse environmental effects of the existing facility are minimal. The potential adverse environmental effects of the operation of the facility will be minimized by structural controls, treatment technologies, and operating procedures which are designed to reduce environmental impacts to the maximum extent possible. Structural controls, such as dikes, berms, and drainage systems, and by adherence to stringent engineered safeguards allows the facility to operate in a manner where pollutants in wastewater are minimized and removed and unplanned releases of significant materials are avoided to the maximum extent possible.

At the LOOP Deepwater Port Complex, wastewater is collected and treated to ensure that the quantity of pollutants is minimized and that discharges are in compliance with permitted levels. The LOOP Deepwater Port Complex operates under a LPDES wastewater discharge permit which was issued by the DEQ. The LPDES permit authorizes and regulates the quality and quantity of pollutants in the wastewater that is allowed to be discharged from the facility in accordance with state water quality standards. The LOOP Deepwater Port Complex is committed to full compliance with the LPDES permit and has an excellent compliance record. All wastewater is monitored in accordance with the LPDES permit and discharged to receiving waters where it has not been demonstrated that any environmental impacts to water quality have occurred. The facility's wastewater discharges have not caused degradation of the water quality or impairment of the existing and designated uses of the water body. The LOOP Deepwater Port Complex has developed and implemented rigorous operating procedures, such as routine inspections, preventive maintenance, and training programs which minimize the potential for permit exceedances or unplanned releases.

As requested in Section 4.0, permit changes will not impact the environment because each requested permit change is allowed for in the state water quality regulations which were developed and implemented by the DEQ to protect the environment and to ensure that water quality is not impacted. Other permit changes will have no impact on wastewater discharges because they affect only the permitting and reporting requirements. Therefore, in as much as this question applies to existing facilities, all potential and real environmental effects from the operation of the facility and discharge of wastewater have been avoided to the maximum extent possible.

2.0 LAC 33:IX.303.F.2

"Does a cost benefit analysis of the environmental impact costs balanced against the social and economic benefits of the proposed facility demonstrate that the latter outweighs the former?"

Yes. The social and economic benefits of the facility greatly outweigh the potential and real environmental impacts. As previously stated, the LOOP Deepwater Port Complex employs structural controls, treatment technologies, and operating procedures so that environmental impacts are minimized to the maximum extent possible. The LOOP Deepwater Port Complex operates an offshore petroleum offloading terminal and onshore pipeline and storage facilities for the transportation of crude oil. Crude oil has a high demand by energy companies. Energy consumption in the world continues to increase which causes a market demand for crude oil. No specific or formal cost benefit analysis is warranted from the operation of the facility or the discharge of wastewater because adverse environmental effects have been minimized to the maximum extent possible.

The LOOP Deepwater Port Complex is located in Lafourche Parish on industrially-developed property which is consistent with the intended land use. The LOOP Deepwater Port Complex is a major contributor in the area in terms of employment and personal income for local residents. The LOOP Deepwater Port Complex also provides significant tax revenues and fees to Lafourche Parish and the State of Louisiana. It is obvious that the LOOP Deepwater Port Complex provides social and economic benefits that far outweigh the potential and real environmental impacts from the operation of the facility and the discharge of wastewater.

As requested in Section 4.0, permit changes will not impact the environment because each requested permit change is allowed for in the state water quality regulations which were developed and implemented by the DEQ to protect the environment and to ensure that water quality is not impacted. Other permit changes will have no impact on wastewater discharges because they affect only the permitting and reporting requirements.

3.0 LAC 33:IX.303.F.3

"Are there alternative projects which would offer more protection to the environment than the proposed facility without unduly curtailing non-environmental benefits?"

No. In as much as this question applies to existing facilities and adverse environmental effects have been minimized to the maximum extent possible, there are no alternative projects which would offer more protection to the environment. As previously stated, the LOOP Deepwater Port Complex employs structural controls, treatment technologies, and operating procedures so that environmental impacts are minimized to the maximum extent possible.

The LOOP Deepwater Port Complex operates all pollution control facilities in accordance with a level of technology necessary to comply with the permitted levels. The LOOP Deepwater Port Complex is committed to full compliance with the LPDES permit and has an excellent compliance record. Since the discharge of wastewater to receiving waters has not caused degradation of the water quality or impairment of the existing uses of the water body, no alternatives to the present system are necessary. Alternative wastewater handling and disposal methods are not economically feasible or warranted. Therefore, consideration of alternative projects is not considered appropriate or necessary since this is an existing facility and environmental impacts have been minimized to the maximum extent possible.

As requested in Section 4.0, permit changes will not impact the environment because each requested permit change is allowed for in the state water quality regulations which were developed and implemented by the DEQ to protect the environment and to ensure that water quality is not impacted. Other permit changes will have no impact on wastewater discharges because they affect only the permitting and reporting requirements.

4.0 LAC 33:IX.303.F.4

"Are there any alternative sites which would offer more protection to the environment than the proposed facility site without unduly curtailing non-environmental benefits?"

No. In as much as this question applies to existing facilities and adverse environmental effects have been minimized to the maximum extent possible, there are no alternative sites which would offer more protection to the environment. As previously stated, the LOOP Deepwater Port Complex employs structural controls, treatment technologies, and operating procedures so that environmental impacts are minimized to the maximum extent possible.

The LOOP Deepwater Port Complex operates all pollution control facilities in accordance with a level of technology necessary to comply with the permitted levels. The LOOP Deepwater Port Complex is committed to full compliance with the LPDES permit and has an excellent compliance record. Since the discharge of wastewater to receiving waters has not caused degradation of the water quality or impairment of the existing uses of the water body, no alternative sites to the present site are necessary. Alternative sites are not economically feasible or warranted because existing infrastructure and structural controls are already in place and relocation of the site would only serve to create new and larger environmental impacts. Therefore, consideration of alternative sites is not considered appropriate or necessary since this is an existing facility and environmental impacts have been minimized to the maximum extent possible.

As requested in Section 4.0, permit changes will not impact the environment because each requested permit change is allowed for in the state water quality regulations which were developed and implemented by the DEQ to protect the environment and to ensure that water quality is not impacted. Other permit changes will have no impact on wastewater discharges because they affect only the permitting and reporting

requirements.

5.0 LAC 33:IX.303.F.5

"Are there mitigating measures which would offer more protection to the environment than the facility as proposed without unduly curtailing non-environmental benefits?"

No. There are no mitigating measures which offer more protection to the environment. As previously stated, the LOOP Deepwater Port Complex employs structural controls, treatment technologies, and operating procedures so that environmental impacts are minimized to the maximum extent possible.

The LOOP Deepwater Port Complex operates all pollution control facilities in accordance with a level of technology necessary to comply with the permitted levels. The LOOP Deepwater Port Complex is committed to full compliance with the LPDES permit and has an excellent compliance record. Since the discharge of wastewater to receiving waters has not caused degradation of the water quality or impairment of the existing uses of the water body, no mitigating measures to the present system are necessary. The LOOP Deepwater Port Complex already conducts routine inspections, preventive maintenance, and training programs as effective mitigating measures. Therefore, consideration of additional mitigating measures is not necessary since this is an existing facility and environmental impacts have been minimized to the maximum extent possible.

As requested in Section 4.0, permit changes will not impact the environment because each requested permit change is allowed for in the state water quality regulations which were developed and implemented by the DEQ to protect the environment and to ensure that water quality is not impacted. Other permit changes will have no impact on wastewater discharges because they affect only the permitting and reporting requirements.