To: Dwyer, Stacey[Dwyer.Stacey@epa.gov]; Shaikh, Taimur[Shaikh.Taimur@epa.gov]; Alvarado, Tina[Alvarado.Tina@epa.gov]; Jones, Bruced[Jones.Bruced@epa.gov]; Magee, Melanie[Magee.Melanie@epa.gov]; Robinson, Jeffrey[Robinson.Jeffrey@epa.gov]; R6-ConfRm-BatonRouge-07B02/R6---07th-Floor[R6-ConfRm-BatonRouge-07B02@epa.gov]
From: Lawrence, Rob
Sent: Tue 2/6/2018 9:22:49 PM
Subject: FW: LOOP Bi-Directional Main Oil Line Project
LOOP LLC Permits.pdf
Pre-Modification Tests and Overfill Protection Systems.pdf
Air Emissions Regulatory Authority Determination.pdf
USFWS_LAHSPO_LANHP_Letters.pdf
LOOP LLC Emergency Preparedness Summary.pdf
LOOP Air Modeling Report August 2017.pdf

Not the document dated 12/12 that LOOP mentioned today (4 page analysis) but is more information from late November. It was embedded in another USCG email.

Rob Lawrence

Region 6

Policy Advisor - Energy Issues

214.665.6580

From: Gordon Arbuckle [mailto:gordona123@earthlink.net]
Sent: Thursday, November 30, 2017 4:26 PM
To: Borland, Curtis <Curtis.E.Borland@uscg.mil>
Cc: Cooper-Gates, CaSandra J. <ccoopergates@loopllc.com>; Gardner-Leblanc, Cynthia (cgleblanc@loopllc.com) <cgleblanc@loopllc.com>; 'Sharp, John (john.sharp@squirepb.com)' <john.sharp@squirepb.com>
Subject: [Non-DoD Source] LOOP Bi-Directional Main Oil Line Project [I-AMS.FID2107614]

Dear Mr. Borland:

LOOP's responses to the USCG's request for additional information on the Bi-Directional Main Oil Line Project, as set out in your email of November 21, 2017, are provided below. Please note that the "Draft Minutes" referred to in your request are currently in draft form because, in accordance with the Committee's usual practice, they are subject to confirmation at the committee's next meeting, currently scheduled for Dec 13, 2017.

1) A list of all current federal and state permits, approvals and authorizations which LOOP is required to maintain in force. The Coast Guard does not require a copy of each permit, but please advise on the issuance and expiration date of each permit.

Please see attachment titled "LOOP LLC Permits".

2) A complete description of the "additional tests that have been performed to analyze system performance during start-up and shutdowns and the resulting data used to develop engineering, administrative and operational controls to ensure safe operation of the system." (EIA, page 3 "Pre-Modification Tests" and "Overfill Prevention Systems"). Please set forth a complete list of the engineering, administrative and operations controls LOOP has developed. Also, please indicate where the "operational controls are detailed in the Operations Manual" (EIA, page 3 "Overfill Prevention Systems").

Please see attachment titled "Pre-Modification Tests and Overfill Protection Systems".

3) The basis for LOOP's conclusion that air emissions from LOOP's marine terminal are "regulated, exclusively, by the Department of Interior under the Outer Continental Shelf Lands Act" (EIA, page 2 "Air Quality").

Please see attachment titled "Air Emissions Regulatory Authority Determination". Please note that the 20.7 mile distance used in the calculations is based on the expected location at the single point mooring of the vessel engaged in loading operations. The platform itself is somewhat closer to the shore.

4) A description of the project design elements which "will be implemented" including a description of the "multiple measures" which will be put in place to "further the goal of protecting life, the environment and general marine safety." (EIA, page 3 "Overfill Prevention Systems");

Please see attachment titled "Pre-Modification Tests and Overfill Protection Systems".

5) Records of correspondence with agencies that have "oversight responsibilities relative to historical resources and other cultural concerns" (EIA, page 4 "Water Quality and other Ecological Impacts");

Please see attachment titled "USFWS LASHPO LANHP Letters".

6) A description of the "structural controls, non-structural controls, and strict operating procedures" which serve to avoid and/or minimize "accidental releases" of wastewater (EIA, page 4 "Water Quality and other Ecological Impacts");

Please see attachment titled "LOOP LLC Emergency Preparedness Summary".

7) The record of correspondence with the "U.S. Fish and Wildlife [Service], Louisiana Office of Historic Preservation, and the Louisiana National Heritage Program" and a description of the nature of the "correspondence" which is "ongoing." (PRC Meeting of September 28th, 2017 - Draft Minutes, page 4); and

Please see attachment titled "USFWS LASHPO LANHP Letters".

8) All "modeling" and "study" documentation which have led to a conclusion that "the hydrocarbon vapors emitted during loading operations" "will not result in on-board ambient air concentrations above OSHA regulatory standards." (PRC Meeting of September 28th, 2017 - Draft Minutes, page 3);

Please see attachment titled "LOOP Air Modeling Report August 2017".

We would be happy to provide any clarifications or additional information you may require.

Sincerely,

Gordon Arbuckle.

Counsel to LOOP LLC

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46 Offices in 20 Countries

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