To: Houston, Robert[Houston.Robert@epa.gov]
From: Lawrence, Rob
Sent: Tue 11/21/2017 3:07:57 PM
Subject: FW: Louisiana Offshore Oil Port - Oil Export Proposal
LOOP - Bidirectional Project - MOL EIA (Sept2017).pdf
LOOP - Bi-Dir Project Decrp-March 22 2017.pdf

Rob Lawrence
Region 6
Policy Advisor - Energy Issues
214.665.6580

-----Original Message-----
From: Lawrence, Rob
Sent: Tuesday, November 21, 2017 9:00 AM
To: Dwyer, Stacey <Dwyer.Stacey@epa.gov>; Shaikh, Taimur <Shaikh.Taimur@epa.gov>; Bogdan, Silvia <bogdan.silvia@epa.gov>; Schwab, Kay <Schwab.Kay@epa.gov>; Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>; Magee, Melanie <Magee.Melanie@epa.gov>
Cc: Alvarado, Tina <Alvarado.Tina@epa.gov>; Gillespie, David <Gillespie.David@epa.gov>
Subject: FW: Louisiana Offshore Oil Port - Oil Export Proposal
Importance: High

FYI

Rob Lawrence
Region 6
Policy Advisor - Energy Issues
214.665.6580

-----Original Message-----
From: Borland, Curtis [mailto:Curtis.E.Borland@uscg.mil]
Sent: Tuesday, November 21, 2017 8:49 AM
To: Yvette.Fields@dot.gov; Morefield, Wade (MARAD) <wade.morefield@dot.gov>; terri.thomas@boem.gov; 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>
Cc: 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>; Vasanth, Pavagada N CIV <Pavagada.N.Vasanth@uscg.mil>; Borland, Curtis <Curtis.E.Borland@uscg.mil>; Bray, Jeff R CIV <Jeff.R.Bray@uscg.mil>; Michael.Pucci@dot.gov; Shepherd II, Thomas (MARAD) <thomas.shepherd@dot.gov>; Gilson, Kristine (MARAD) <kristine.gilson@dot.gov>
Subject: Louisiana Offshore Oil Port - Oil Export Proposal

Pre-decisional - Releasability under FOIA to be determined - FOIA Withholding Exemptions (4) and (5)

Good morning All,

As you may be aware, the Louisiana Offshore Oil Port (LOOP), an offshore oil import facility licensed by the Secretary of Transportation pursuant to the Deepwater Port Act, has requested approval of a proposal to convert its "Main Oil Line" (MOL) to bi-directional flow. This proposed change to the MOL will allow LOOP to reverse oil flow and provide vessel loading services to VLCCs and ULCCs at its marine terminal. To accomplish this, LOOP proposes to install a series of piping modifications including adding and

modifying meters and removing check valves at several locations between the onshore Clovelly Dome Storage Terminal and the offshore marine terminal/single point mooring buoy. The Pipeline & Hazardous Materials Safety Administration (PHMSA) is currently evaluating the proposed MOL modifications to ensure appropriate pipeline safety construction and operation standards are in place.

The Coast Guard is responsible for the review and approval of LOOP's proposed Operations Manual (OPSMAN) amendments that implement cargo loading procedures. Recently, the Coast Guard received LOOP's "Environmental Impact Analysis" (EIA) (attached) which purports to provide an overview of the environmental impact of the MOL modifications and cargo loading operations. (Note - The EIA is short...only 4 pages of text followed by Annex A with air emission calculations. Also attached is a (business confidential) project description.) I request your review of the EIA followed by a conference call early next week (propose Tuesday, November 28 - 1400 EST) to discuss:

1) the sufficiency of the EIA's analysis;
2) the validity of LOOP's assertion that "[e]missions from LOOP's Marine Terminal and Vessels receiving cargos at the terminal are regulated, exclusively, by the Department of Interior under the Outer Continental Shelf Lands Act." (see page 2, para. III.B. - Air Quality);
3) confirmation of the status of relevant permits, approvals or authorizations (e.g., CWA (NPDES), CAA (Title V), MMPA (IHA/LOA), etc.); and,
4) the status of PHMSA's review of LOOP's MOL modifications.

Hopefully, at the end of the discussion, we will have a consensus understanding of the project and agreement on the path forward to complete review of LOOP's proposal. Please advise on your availability next week for a conference call. If there are others in your organization who should participate, please forward this email as appropriate. However, I request this email and attachments be kept within the federal family for now. If the proposed time is good (Tuesday, November 28 - 1400 EST), I will send a calendar invite with call-in information.

Please accept my best wishes for a wonderful Thanksgiving Holiday!

Sincerely,

Curtis

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