To: Mark Prescott[prescott2081@gmail.com]
From: Lawrence, Rob
Sent: Thur 3/1/2018 10:12:53 PM
Subject: RE: Ghost from the past - DPA
LOOP - OPIS Article - LA Bucket Brigade.docx

Thanks for the background information. We are still looking at the emissions at question. I would point out this article from early January about the lack of a vapor recovery system.

Rob Lawrence

Region 6

Policy Advisor - Energy Issues

214.665.6580

From: Mark Prescott [mailto:prescott2081@gmail.com]
Sent: Thursday, March 01, 2018 3:44 PM
To: Lawrence, Rob <Lawrence.Rob@epa.gov>
Subject: Re: Ghost from the past - DPA

Hi Rob,

Yeah, just checked with the folks that I am working with and Trinity is apparently representing the applicant, who for some reason wants to remain unnamed. The consulting group that I am working with is developing their DWP application and plan to submit I think around beginning of May this year.

That said, the same consulting company is working with two other companies, also wanting to set up crude oil deepwater port export facilities. The first of those two met with CG/MARAD around Thanksgiving and said the company would make a decision at the end of March about whether to go full steam ahead on preparing an application to be submitted 4th Qtr this year. The other company I just heard about, they are in the early consideration phase for an application.

Now I would be shocked if the only people considering this just happen to be working with the consultant I am dealing with, so there could be more. I talked to Roddy Bachman today and

discussed the first applicant and acknowledged the possibility of two others. So, he should be able to let you know what else in hiding in the woodwork.

Happy to chat with you about any of this. These guys are still curious about how to deal with vapor emissions from offshore loading operations, I would guess the they will raise that issue in their meeting next week.

Mark

703-994-8693 (cell)

On Thu, Mar 1, 2018 at 11:44 AM, Lawrence, Rob <Lawrence.Rob@epa.gov> wrote:

Mark – wanted to follow-up some more on the proposal. We are meeting next week with Trinity Consultants, an air modeling and permitting firm, about a crude terminal offshore of Texas. They haven't revealed the name of the client nor a detailed description / location.

Also, we have heard from Jeff Saitis, former executive director of the Texas Commission on Environmental Quality, about an offshore crude terminal. But again, he didn't say who, what or where. It might be the same as the project we will hear about next week. Or it could be totally different.

Curious if either of these consultants might be associated with the project you mentioned in October. Trying to look at our potential workload and it is difficult to know if there are 3, 2 or 1 offshore crude terminals coming forward.

Rob Lawrence

Region 6

Policy Advisor - Energy Issues

214.665.6580

From: Mark Prescott [mailto:prescott2081@gmail.com]
Sent: Friday, October 20, 2017 11:29 AM

To: Lawrence, Rob <Lawrence.Rob@epa.gov>
Subject: Re: Ghost from the past

Enjoy Cancun. This would be a crude oil export terminal. Pipeline probably 15 plus miles to a single point mooring. So can not send the vapor back to the source very easily. It would seem like the emissions need to be addressed in the EIS for sure and look at both safety and emissions in an air permit that I assume would be required. As you know CG will defer to EPA.

Hey maybe right when you are ready to retire they'll offer some incentive package to get you to leave.

On Fri, Oct 20, 2017 at 11:40 AM Lawrence, Rob <Lawrence.Rob@epa.gov> wrote:

FYI – I am on vacation for the next 2 weeks. Enjoying my timeshare in Cancun!

Wanted to clarify a point. This is a crude oil offshore terminal or another LNG terminal. We may have some preliminary thoughts if it is an LNG terminal as Port Delfin has approached us with a design – not a complete air permit application. It is easier to see how any fugitive emissions from the LNG transfer could be captured and managed. Not sure we have really considered those aspects from a crude transfer.

On retirement, I turn 62 in January 2019, so that is my minimum target date. It helps that our lease expires in February and plans are underway to move a couple of blocks further into downtown Dallas (weirdly back to the same building EPA left 30 years ago). Rumor this week was that the move was slipping several months so I would probably stay on until then.

Enjoy your weekend.

Rob Lawrence

Region 6

Policy Advisor - Energy Issues

214.665.6580

From: Mark Prescott [mailto:prescott2081@gmail.com]
Sent: Friday, October 20, 2017 10:28 AM
To: Lawrence, Rob <Lawrence.Rob@epa.gov>
Subject: Re: Ghost from the past

Hi Rob

Yeah, retired from my prior position, but clearly still working. I will try to give you a call next week and get your thoughts on how this potential applicant should proceed as far as getting an answer and timing with regards to an actual submittal.

Also, happy to give my two cents on the timing if when to retire. Have had my conversations and thoughts on waiting to long or going to soon. Alsways best to be planning well in advance.

Have a good weekend

Mark

On Tue, Oct 17, 2017 at 1:43 PM Mark Prescott <prescott2081@gmail.com> wrote:

> ---------- Forwarded message ---------
> From: Lawrence, Rob <Lawrence.Rob@epa.gov>
> Date: Tue, Oct 17, 2017 at 12:45 PM
> Subject: RE: Ghost from the past
> To: Mark Prescott <prescott2081@gmail.com>
>
> Mark – great to hear from you. So many folks have retired over the last couple of years, I have to check to see if I have missed the boat. My plan is to stay at least through January 2019 and then play it by ear. Sounds like you haven't really retired!
>
> There has been a rumor that someone wanted to build a terminal off Texas, but

we haven't met yet with anyone. Are you talking about a crude export terminal or another LNG terminal? LOOP has been talking about expanding and becoming both an import and an export crude hub. I guess the production from the Permian and Eagle Ford formations has to go somewhere and the Gulf Coast refineries were built for heavy crude that is brought in to the US.

And yes, I have spoken to a couple of folks from the Freeport-McMoRan team about dusting off their proposal. We will wait and see if it ever materializes.

Did you see the NY Times articles on LNG economics? If not, I can forward them to you. Very interesting perspective from the days of import to the current export situation.

On your technical inquiry, our regional staff generally doesn't look into issues until we have an application that raises it. So I haven't heard any postioning on the air emissions from transference. But I can ask around if necessary.

Rob Lawrence

Region 6

Policy Advisor - Energy Issues

214.665.6580

From: Mark Prescott [mailto:prescott2081@gmail.com]
Sent: Tuesday, October 17, 2017 10:46 AM
To: Lawrence, Rob <Lawrence.Rob@epa.gov>
Subject: Ghost from the past

Hi Rob

This is Mark Prescott, I think before I departed the Coast Guard a few years ago I talked about riding into the sunset and going off to get a degree in exercise physiology. Well, that's what I have done and I currently work at a hospital in Manassas Virginia in Cardiac Rehab.

Very recently, a former employee of mine, asked if I wanted to help a company that is putting together a DWP application for an export terminal off of Texas. So, on a very limited basis, I am doing some "consulting" and helping them properly navigate the process of putting together and submitting an application. I recently inquired with CG DWP folks about vapor collection for a loading tanker that would be taking on oil at a single point mooring outside of state waters. Roddy Bachman gave me your contact info and suggested that I touch base with you.

If you have a few moments, I would like to say hello and see if EPA has considered this issue as of yet; basically how are vapors treated at a deepwater. I understand that LOOP may be looking to do similar activity so maybe this isn't unique.

thanks

Mark

703-994-8693 (cell)