

From: Lott, Trent [mailto:trent.lott@squirepb.com]
Sent: Wednesday, November 29, 2017 11:48 AM
To: Jackson, Ryan <jackson.ryan@epa.gov>
Subject: Lott Follow up TOTE Permit

Ryan,

By all accounts, TOTE and I were very pleased and appreciated the attention that Administrator Pruitt and you afforded us in your offices on September 27, 2017. As you recall, one option raised during the meeting and one that TOTE desires is moving forward with an extension of the preexisting application approach

I also see merit in this approach and provided to your attention several documents to assist in moving forward in that direction in an email dated November 6, 2017 (provided below).

Recognizing that it has been two months since our initial meeting, I request to meet or conference with Administrator Pruitt and/or you at your earliest convenience.

Trent Lott

From: Lott, Trent
Sent: Monday, November 6, 2017 1:01 PM

To: Jackson.ryan@epa.gov
Subject: TOTE Permit

Ryan,

Thanks for your response last Friday and update that you are working through the TOTE permit situation.

TOTE prefers and I see merit with moving forward with an extension on the preexisting application approach that was discussed during the September 27, 2017 meeting with you and Administrator Pruitt.

In addition to the preexisting application and other documents previously advanced with EPA (attached), I thought it would be helpful to share the text below from the International Maritime Organization (IMO) which allows for the 5 year extension to the permit.

Please know that TOTE and I very much appreciate your attention and support of the LNG vessel permit issue.

Trent

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<http://www.imo.org/en/KnowledgeCentre/IndexofIMOResolutions/Marine-Environment-Protection-Committee-%28MEPC%29/Documents/MEPC.176%2858%29.pdf>

Trials for ship emission reduction and control technology research

2 The Administration of a Party may, in cooperation with other Administrations as

appropriate, issue an exemption from specific provisions of this Annex for a ship to conduct trials

for the development of ship emission reduction and control technologies and engine design

programmes. Such an exemption shall only be provided if the applications of specific provisions

of the Annex or the revised NOx Technical Code 2008 could impede research into the

development of such technologies or programmes. A permit for such an exemption shall only be

provided to the minimum number of ships necessary and be subject to the following provisions;

.1 for marine diesel engines with a per cylinder displacement up to 30 litres, the

duration of the sea trial shall not exceed 18 months. If additional time is required,

a permitting Administration or Administrations may permit a renewal for one

additional 18-month period; or

.2 for marine diesel engines with a per cylinder displacement at or above 30 litres,

the duration of the ship trial shall not exceed 5 years and shall require a progress

review by the permitting Administration or Administrations at each intermediate

survey. A permit may be withdrawn based on this review if the testing has not

adhered to the conditions of the permit or if it is determined that the technology or

programme is not likely to produce effective results in the reduction and control of

ship emissions. If the reviewing Administration or Administrations determine that

additional time is required to conduct a test of a particular technology or

programme, a permit may be renewed for an additional time period not to exceed

five years.