

To: Lott, Trent[trent.lott@squirepb.com]; Flynn, John[john.flynn@squirepb.com]
From: Jackson, Ryan
Sent: Wed 12/6/2017 10:08:26 PM
Subject: RE: Lott Follow up TOTE Permit

Gentlemen, what I can presently report is that when I originally meet with our Office of Air and Radiation, I requested updates to get back directly with you. However, the OAR having worked with the company on the prior permits have worked directly with TOTE. In any event, the week of November 27th Will Charmley from the Office of Transportation and Air Quality (OTAQ) spoke with Peter Keller, a Senior Vice President for TOTE. They discussed what steps EPA/Coast Guard, and also TOTE, would need to take over the next few weeks to draft a new permit. I say new permit only because the Coast Guard advised TOTE in October that it was terminating the existing permits for the Midnight Sun and North Star.

On December 1st, Chris Grundler, Director of OTAQ (which is located in Ann Arbor), advised headquarters that EPA and TOTE are making progress meaning extending the dates of the previous permit and the terms TOTE needs to meet.

EPA met with TOTE's, contractor (MAN, the engine company who will builds the conversion kits), and the Coast Guard to chart the path forward. This followed up on the June 2017 meeting where EPA hosted TOTE and MAN for a technical meeting in Ann Arbor. At that point in June, which I believe is still the case, MAN reported that they are developing a retrofit kit but development work was still necessary. However, TOTE presented a timeline where conversions would take place on the first vessel between mid-2019 and mid-2020 and on the second vessel between mid-2020 and mid-2021. TOTE was continuing to work to develop the detailed LNG conversion project milestones which could be captured in the permit.

So it seems like we are on track. I'm glad to get on a phone call but presently I'm preparing Pruitt for testimony before E&C tomorrow morning, a meeting with the President tomorrow, and an international trip. It may be worth a follow up to TOTE to ensure I have all the correct information.

Ryan.