

U.S. Department of
Homeland Security

United States
Coast Guard



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United States Coast Guard

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16703/33-154/2014-843
03OCT2014

Mr. Blake Vaughn
John Zink Company, LLC
11920 East Apache St.
Tulsa, OK 74116

Subj: DETONATION ARRESTER AND GAS INJECTION POINT DISTANCE EXEMPTIONS FOR OHIO OIL AND GATHERING (ENLINK) LOADING FACILITY IN NEWPORT, OH

Dear Mr. Vaughn:

This letter is in response to your letter dated September 8, 2014, which requested an exemption from the requirements of Title 33, Code of Federal Regulations (CFR), parts 154.2105(d)(1) and 154.2107(b) for a new marine vapor control system (VCS) to be owned and operated by Ohio Oil & Gathering (EnLink) at their loading facility in Newport, OH. You stated that the VCS will be used to control vapors displaced during the loading of hydrocarbon liquids into non-inerted vessels. The VCS will consist of one Dock Safety Unit (DSU) and one Vapor Combustion Unit (VCU). You provided drawings and Piping and Instrument Diagrams (P&IDs) with your letter.

You stated that Ohio Oil & Gathering (EnLink) is unable to install the DSU within the requirements of 33 CFR 154.2105(d)(1) and 154.2107(b) due to limited space on the dock. Placing the DSU on the dock will remove egress space and eliminate the operator's ability to egress safely. With the DSU being placed at a further location, the distance to the DA and gas injection point (GIP) will be extended, and unable to meet the requirements set forth in 33 CFR part 154 subpart P.

The new piping will extend the distances of the dock DA and GIP beyond the 18 meter and 22 meter requirements of 33 CFR parts 154.2105(d)(1) and 154.2107(b). The increased distances from the facility vapor connection (FVC) to the DA and GIP are listed below:

	Distance
FVC to dock DA	45.4 m (149 ft)
FVC to Gas Injection Point	47.9 m (157 ft)

33 CFR part 154.2105(d)(1) requires a DA to be located not more than 18 meters (59.1 feet) from the FVC and 33 CFR part 154.2107(b) requires a gas injection and mixing arrangement to be located not more than 22 meters (72.2 feet) from a FVC. The primary purpose of these requirements is to minimize the length of "unprotected" vapor piping that remains susceptible to internal or external ignition sources, which may start a deflagration of the flammable cargo vapor within the pipe and ultimately transition to a detonation prior to reaching the tank vessel's cargo tanks. Considering the design of a typical marine VCS, such an external ignition source would most likely be a spark caused by mechanical damage to the piping. You state that you have taken protective measures for the pipeline by placing dolphins up and down stream to prevent collision by large marine vessels. Furthermore, the pipe is elevated above small vessel traffic which will also prevent collision.

Your proposed design places the dock DA and the enrichment GIP further from a FVC than the regulations permit. Your justification for this request is that there will be no equipment that can be

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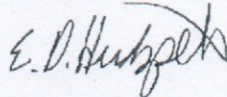
considered as an ignition source installed between a FVC and the dock and protective measures have been taken to keep the piping safe. Your justification is supported by the pictures and piping isometrics provided.

Your request for an exemption from the requirements of 33 CFR parts 154.2105(d)(1) and 154.2107(b) is granted for Ohio Oil & Gathering (EnLink)'s loading facility in Newport, OH. The distances from the FVC to the DA and from the FVC to the GIP must not exceed those limits set in the table above.

This exemption is granted only for the marine VCS operations at the Ohio Oil & Gathering (EnLink) facility in Newport, OH. A copy of this exemption letter shall be incorporated into each copy of the facility operations manual. In addition, the facility operator shall ensure that a copy of this exemption letter is made part of the facility's VCS certification letter that is provided to the cognizant Coast Guard Captain of the Port.

If you have any questions regarding this matter, please contact LT Cristina Nelson, of my staff, at (202) 372-1419 or by e-mail at cristina.e.nelson@uscg.mil.

Sincerely,



E. D. Hudspeth, CDR
Chief, Hazardous Materials Division
By direction of the Commandant

Copy: Sector Ohio Valley
MSU Huntington