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September 4, 2014

L.M. Roldan
Commander, U.S. Coast Guard
Hazardous Materials Division
Commandant (G-MSO-3)
U.S. Coast Guard
2100 Second Street, S.W.
Washington, D.C. 20593-0001

Reference: Request for Liquid Seal Exemption for Ohio Oil & Gathering
Marine Vapor Combustion System in Newport, OH

Dear Commander Roldan:

The purpose of this letter is to request an exemption to the requirement for a liquid seal on a new Marine Vapor Combustion System (MVCS) to be owned and operated by Ohio Oil & Gathering at their terminal in Newport, OH. The MVCS will be used to control vapors displaced during the loading of hydrocarbon liquids into non-inerted vessels. The MVCS will consist of one Dock Safety Unit (DSU) and one Vapor Combustion Unit (VCU). The new MVCS will consist of an enclosed flare equipped with Zink anti-flashback burners. Copies of the P&IDs and general assembly drawings are enclosed. Please notice the thermocouples for flame detection will be outside the combustion stack.

The reason for this request is to avoid the operational difficulties associated with using liquid seals, and the justification for this request is that we believe anti-flashback burners provide a level of safety at least as great as that of the liquid seal. This was described in detail in our letter to the U.S. Coast Guard dated April 26, 1996. Again we ask that the proprietary information in this letter be kept confidential.

We would very much appreciate your consideration of our request as soon as possible due to our schedule requirements. Please call me at 918-234-4793 if you have any questions of need more information. Thank you very much.

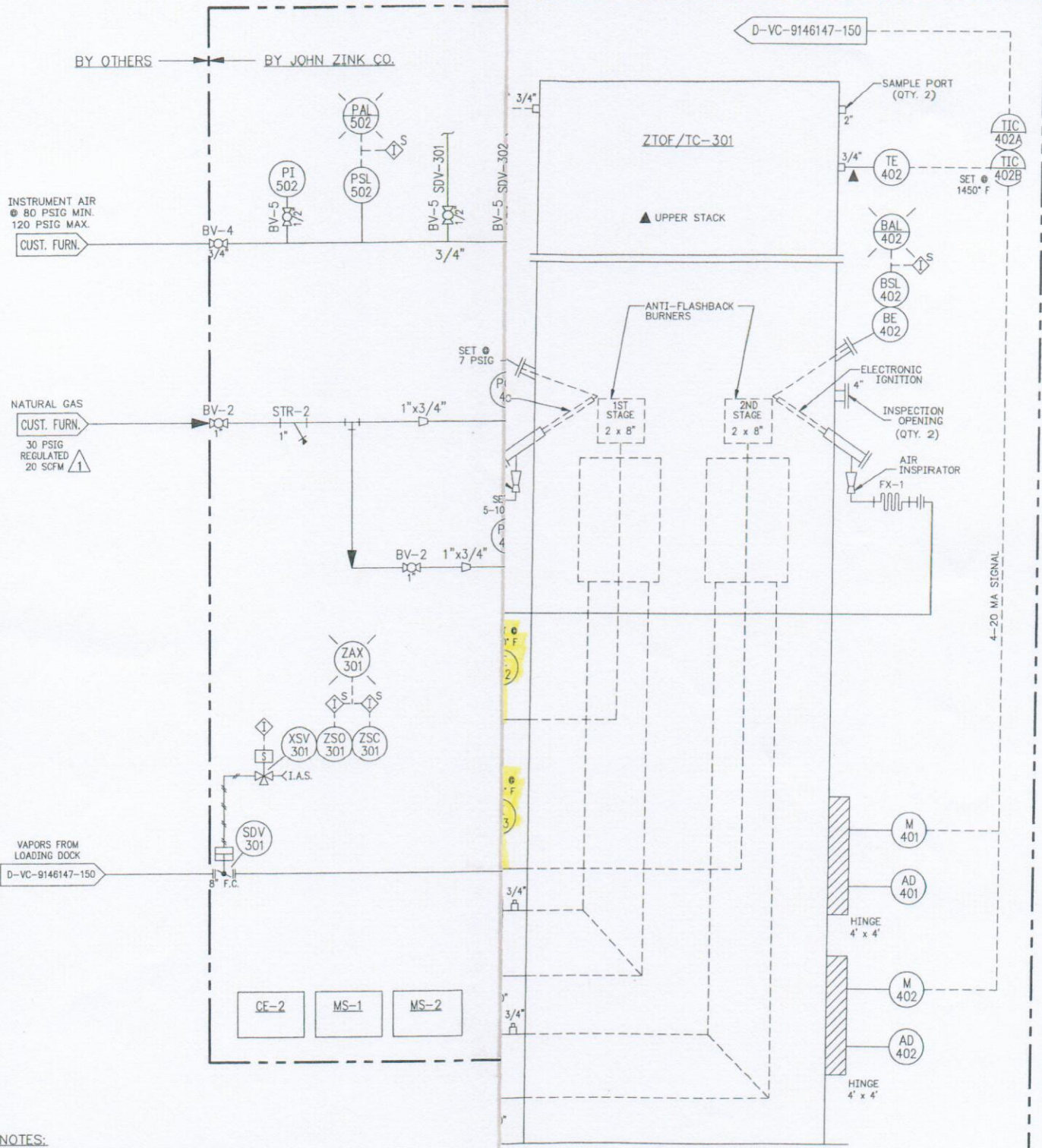
Sincerely,

John Zink Company, LLC
Blake Vaughn
Project Engineer

TBV/tbv

CE-2
CONTROL
SIZE: 48" x 36"
NEMA 4X STAINL

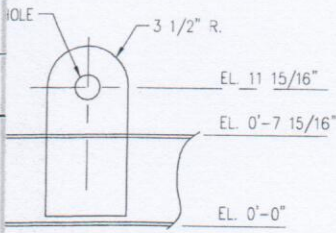
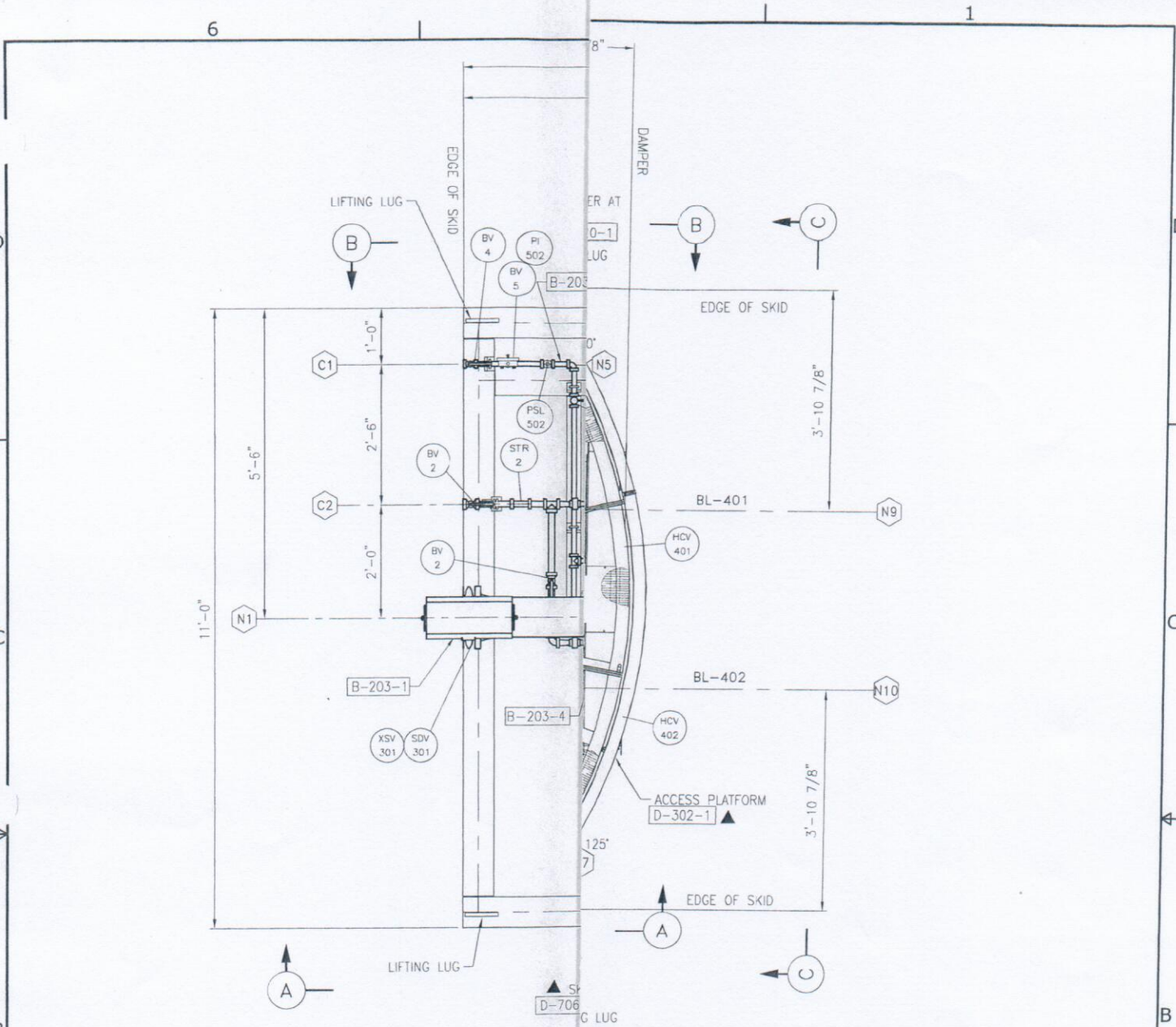
ZTOF/TC-301
COMBUSTOR STACK
9'-0" x 50'-0" O.A.L.



- NOTES:**
- ▲ DENOTES EQUIPMENT TO BE SHIPPED LOOSE AND FIELD INSTALLED BY OTHERS. INSTALLATION MAY REQUIRE MECHANICAL FIT UP, PIPING AND WIRING.
 - LOCAL
 - LOCAL PANEL INDICATION
 - LOCAL PANEL MOUNT
 - HEAT TRACE AND INSULATION, BY CUSTOMER, IF REQUIRED.
 - ** DENOTES EQUIPMENT FURNISHED BY OTHERS.
 - COMBUSTOR SKID AREA CLASSIFICATION IS NON-CLASSIFIED.

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|----------------------------------|--|
| FOR: OHIO OIL GATHERING II, LLC | JOHN ZINK JOHN ZINK COMPANY LLC PARTS AND SERVICE, CALL 1-800-755-4252 FAX (918) 234-1968 |
| USER: OHIO OIL GATHERING II, LLC | |
| JOBSITE: NEWPORT, OH | PIPING & INSTRUMENT DIAGRAM |
| S.O. NO. VC-9146147 | SAFETY & INJECTION SKID |
| P.O. NO. P0100-000001698 | MODEL: ZCM-3/3-9-50-X-2/8-2/8-FLANGED |
| DR. RPJ DATE: 2-12-14 | CERTIFIED |
| CK. TBV DATE: 2-25-14 | DRAWING NUMBER D-VC-9146147-151 |
| DATE: 2-25-14 | SCALE N/A |
| | SHEET 1 of 1 |



LIFTING LUG DETAIL
(TYP. OF 4)

LUG DESIGNED FOR 13.5 TON CROSBY
R SHACKLE AND VERTICAL SLINGS
(UNDER BEAM OR FRAME REQUIRED)

APPROX. DEAD WEIGHT OF SKID WITH
BOTTOM 10 FEET OF STACK = 8,199 lbs.

▲ - INDICATES SHIPPED LOOSE ITEMS.

JOHN ZINK HAMWORTHY
COMBUSTION
JOHN ZINK COMPANY, LLC

FOR: OHIO OIL GATHERING II, LLC
USER: OHIO OIL GATHERING II, LLC
JOB SITE: NEWPORT, OH.

GENERAL ARRANGEMENT
VAPOR COMBUSTOR SKID
MODEL: VCM-3-9-50-X-2/8-2/8-FLANGED

| | | | | |
|--------------------------|-----------------|--------------|---------------|---------------|
| S.O. NO: VC-9146147 | DRAWN: AW | CHK: GFG | APP: BV | SHEET: 1 OF 3 |
| P.O. NO: PO100-000001698 | DATE: 3/7/14 | DATE: 4/9/14 | DATE: 4/11/14 | |
| SCALE: NONE | DRAWING NUMBER: | | | REV. 1 |

ANCHOR
(ALL ANCHOR)

D-VC-9146147-203

File Name: c:\active\p-vapor\9146147\trailing\Drawings\203s1r1.dwg Plot Date: 5/7/2014 2:01 PM