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September 8, 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 DETONATION ARRESTER AND GAS INJECTION LOCATION
EXEMPTION.

Dear Commander Roldan:

The purpose of this letter is to request an exemption to requirements 33 CFR 154.2204(b)(1) and 154.2107(b) for a new Marine Vapor Combustion System (MVCS) to be owned and operated by Ohio Oil & Gathering (EnLink) at their loading facility 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). Copies of the customer drawings and piping isometrics are attached.

Ohio Oil & Gathering has one loading dock at this facility. Drawings and photographs depicting the loading dock are attached. Due to its size, placement of the Dock Safety Unit on this existing loading dock would result in removal of the sole egress path for operators at the loading dock resulting in potentially unavoidable, hazardous conditions for said operators. Modifying the existing loading dock to accommodate the DSU and maintain an egress point would be very difficult due to the design of the existing structure. As a result, the location for the DSU deemed safest would place it on the shore, and would place the detonation arrestor 149 feet from the facility vapor connection (33 CFR 154.2204(b)(1)) and the gas injection and mixing arrangement 157 feet from the facility vapor connection (33 CFR 154.2107(b)).

The pipe upstream of the DSU is protected by multiple safeguards. Two dolphins, one upriver and one downriver from the loading dock, protect the vapor piping from large marine vessels. The elevation of the pipe

from the shore to the loading dock provides protection from smaller vessels. On shore fencing and barricades protect the piping from vehicles. Schedule 40 pipe will be used offering substantial structural strength.

Realizing the potential hazards operators would be exposed to, the current safeguards in place to protect the vapor piping from physical damage, and the lack of ignition sources in the vapor pipe upstream of the DSU Ohio Oil & Gathering would like to request an exemption to add 90 feet of additional pipe to the 59 feet requirement of 33 CFR 154.2204(b)(1) for a total of 149 feet of vapor pipe between the detonation arrestor and the vapor facility connection and an additional 85 feet of pipe to the 72 feet requirement of 33 CFR 154.2107(b) for a total of 157 feet of pipe between the gas injection and mixing arrangement and the facility vapor connection.

John Zink and Ohio Oil & Gathering would 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 or need more information. Thank you very much.

Sincerely,

 9/8/2014

Blake Vaughn

Project Engineer



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