



U.S. Department
of Transportation
**Maritime
Administration**

Administrator

1200 New Jersey Avenue, SE
Washington, DC 20590

May 12, 2021

Ms. Lisa Burley
Chief/Supervisory Attorney-Advisor
Cargo Security, Carriers and Restricted Merchandise Branch
Office of Trade, Regulations and Rulings
U.S. Customs and Border Protection

Dear Ms. Burley:

This letter is in response to the request provided to MARAD on May 11, 2021, pertaining to the request pending with you to waive the coastwise navigation laws as applied to eight cargoes designated by Valero Marketing and Supply Company (Valero) as requiring transportation absent the availability of coastwise-qualified vessels. We assess that in one instance, a coastwise-qualified vessel is not available to transport one of the identified cargoes.


The request depicts eight cargoes of consisting of ~300,000 barrels each, with preferred loading dates ranging from May 11 through May 19. Separately, Valero's counsel, Blank Rome LLP, has noted that their client's two highest priorities are the lots destined from Corpus Christi, Texas, to Montreal, Canada; and from St. Charles, Louisiana, to Jacksonville, Florida, with further delivery to Linden, New Jersey.

For the cargo destined for Montreal, a waiver is not required as it is not a point in the United States. However, if additional information is available as to why a waiver would be required for an international cargo, we could certainly assist in determining availability. As for the cargo to Jacksonville and Linden, our assessment is that there are insufficient U.S.-flag vessels to lift that cargo in its entirety as the desired load dates are May 11 through 12.

For the remaining cargoes, with specified load date ranges extending from May 16 through 19, it is our assessment that coastwise qualified vessels appear to be available to fulfill those requirements. Our survey indicated that seven coastwise qualified vessels, each capable of carrying roughly 330,000 barrels, would be available on May 21. Unless some urgent and compelling reason exists whereby Valero cannot accept these vessels, we consider them to be available to meet the transportation requirements set forth in this request. This determination is subject to reassessment under changed circumstances. MARAD is available to run additional market surveys as needed.

Please feel free to contact Mr. Tony Padilla at (202) 366-7045 if we can be of further assistance.

Sincerely,



Lucinda Lessley
Acting Maritime Administrator