From: Belke, Jim
To: Stucky, Marie
Cc: Haas, Craig
Subject: RE: ITC Tank Farm - FW: SDSs
Date: Wednesday, April 03, 2019 11:46:00 AM
Attachments: ITC Deer Park tank analysis.xlsx

Marie – here is my analysis (attached) based on the information we have so far. The SDSs were helpful in determining that some of the gasoline and naphtha blends are NFPA-3. If accurate, they are not covered.

There are five tanks where there is not enough information to say for sure whether they are covered. SDSs for those tanks would be helpful if we can get them.

Jim Belke

From: Stucky, Marie
Sent: Wednesday, April 03, 2019 10:44 AM
To: Haas, Craig <Haas.Craig@epa.gov>; Belke, Jim <Belke.Jim@epa.gov>
Subject: RE: ITC Tank Farm - FW: SDSs

At this point, we are looking if they are regulated substances under Part 68. I will likely get the EHS question as a follow-up in the future, but right now we are focused on RMP.

From: Haas, Craig
Sent: Wednesday, April 3, 2019 9:42 AM
To: Stucky, Marie <Stucky.Marie@epa.gov>; Belke, Jim <Belke.Jim@epa.gov>
Subject: RE: ITC Tank Farm - FW: SDSs

Are we trying to determine if these are regulated substances under Part 68, or if they are EHSes for the purposes of General Duty?

From: Stucky, Marie
Sent: Wednesday, April 03, 2019 10:39
To: Belke, Jim <Belke.Jim@epa.gov>; Haas, Craig <Haas.Craig@epa.gov>
Subject: FW: ITC Tank Farm - FW: SDSs

From: Smalley, Bryant
Sent: Wednesday, April 3, 2019 9:29 AM
To: Thompson, Steve <thompson.steve@epa.gov>; Stucky, Marie <Stucky.Marie@epa.gov>
Subject: FW: ITC Tank Farm - FW: SDSs

This is what I have.

Bryant

From: Adams, Adam
Sent: Monday, March 18, 2019 1:03 AM
To: Rauscher, Jon <Rauscher.Jon@epa.gov>; Smalley, Bryant <smalley.bryant@epa.gov>
Subject: ITC Tank Farm - FW: SDSs

FYI for reference.

From: Mike Taylor <mtaylor@iterm.com>
Sent: Monday, March 18, 2019 12:53 AM
To: Adams, Adam <Adams.Adam@epa.gov>; spill12@tceq.state.texas.gov; b.latham@WestonSolutions.com; Mason, Steve <mason.steve@epa.gov>; Daniel Tighe <Daniel.Tighe@WestonSolutions.com>
Cc: Mike Taylor <mtaylor@iterm.com>; harrison.reback@bakerbotts.com; matthew.kuryla@bakerbotts.com
Subject: SDSs

Here are the SDSs for tanks 80-2, 80-3, 80-5, 80-6, 80-8, and 80-11. I wrote the corresponding tank numbers at the top.

Mike Taylor
Environmental Compliance Specialist
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