ITC - Clean Air Act Investigation Summary

We have conducted several compliance monitoring activities at the ITC terminal in Deer Park since 2012. None of these activities resulted in a formal EPA enforcement action. Below is a brief facility summary and a summary of EPA CAA investigations.

Facility Summary

Intercontinental Terminals Company (ITC) owns and operates a for-hire bulk liquid storage terminal (Deer Park Terminal) located in Deer Park, Harris County, Texas that is authorized to receive, store, and transfer chemicals, crude, and petroleum products. The Deer Park Terminal storage tanks and associated loading, piping, control, and support facilities are authorized by Title V Permit No. O-1061, issued by the Texas Commission on Environmental Quality. The Title V permit, last modified in November 2017, authorizes 222 storage tanks. These tanks may be subject to a variety of regulations including the following: NSPS K, NSPS Ka, NSPS Kb, NESHAP Y, MACT R, and MACT EEEE. The applicability of these regulations is determined by the specific applicability section of the referenced subparts. Intercontinental Terminals Company LLC is a subsidiary of Mitsui & Co. (USA), Inc. according to the Mitsui website.

August, October 2012 EPA Region 6 CAA Inspection

In 2012-2013, Region 6 conducted investigations at two tank terminals, ITC and Vopak terminals in Deer Park in response to an analysis of elevated benzene concentrations at the Deer Park and Channelview ambient monitors operated by TCEQ. In August, 2012, Region 6 sent records requests to both facilities, focused on their tanks compliance records, and followed that up with an on-site CAA inspection at both facilities in October, 2012. The inspectors used an optical gas imaging IR camera to survey volatile organic compounds (VOC) emissions sources at the facilities. **The inspection report for ITC noted several areas of concern but subsequent compliance discussions with the company and review of the evidence led Region 6 to decide against formal enforcement against ITC.** The violations at Vopak were pursued and EPA entered into a Consent Decree (in which the State of Texas was a Co-Plaintiff) with Vopak on May 17, 2017.

April, May 2013 NEIC Monitoring in and around ITC

NEIC conducted mobile monitoring with their Geospatial Measurement of Air Pollutants (GMAP) in the Houston Ship Channel several times over the next few years:

- In April and May 2013, NEIC conducted GMAP monitoring near ITC and Vopak on May 1, 2013.
- In 2016, NEIC conducted an advanced technology demonstration at ITC with infrared cameras, their GMAP, S-Pods, and air canisters. The areas of concern listed by NEIC related to flaring inefficiency (addressed with the company in a 2016-2017 flaring investigation described below),

emissions from a single wastewater tank, and elevated readings that NEIC concluded "appear to be coming from neighboring facilities."

May 2016 EPA Region 6 Flaring Investigation:

In May 2016, Region 6 sent an information request to ITC for flaring data. In subsequent discussions with Region 6, ITC explained that that they had discovered the failure of some of their monitoring equipment which may have led to insufficient natural gas addition. The facility began implementing corrective actions as soon as the issue was discovered in the summer of 2016 and completed all corrective actions around May 2, 2017. ITC provided documentation through December 2017 that showed a return to compliance and Region 6 closed the investigation without formal enforcement.