Intercontinental Terminals Company LLC
P.O. Box 698 Deer Park, Texas 77536-0698
FAX (281) 884-0399
(281) 884-0300

October 5, 2011

Executive Director
c/o Mr. Manuel Bautista, Air Section Manager
Texas Commission on Environmental Quality
Region 12
5425 Polk Ave., Suite H
Houston, Texas 77023

Certified Mail 7011 1150 0001 9701 7214
Return Receipt Requested

RE: Texas Operating Permit Deviation Report
Intercontinental Terminals Company Operating Permit No. O-01061
Intercontinental Terminals Company Account No. HG-0403-N

Dear Mr. Bautista:

Pursuant to Texas Operating Permit Report, enclosed is the six-month deviation report from 3/08/11 through 9/07/11. Please advise if you need additional information.

Sincerely,

Carl E. Holley
Vice President, SHES and
Regulatory Compliance

ms
Enclosures
c: Mr. Ralph Chaiet, P.E., O'Brien's Response Management Associates, Inc.
EPA Region 6, Administrator

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION		
A. RN: 100210806	B. CN: 603186495	C. Account No.: HG-0403-N
D. Permit No.: 0-1061	E. Project No.: 1061	
F. Area Name: ITC Deer Park Terminal		
G. Company Name: Intercontinental Terminals Company LLC		

II. CERTIFICATION TYPE *(Please mark the appropriate box)*	
A. ☑ Responsible Official:	B. ☐ Duly Authorized Representative:

III. SUBMITTAL TYPE *(Place an "X" in the appropriate box) (Only one response can be accepted per form)*	
☐ SOP/TOP Initial Permit Application	☐ Update to Permit Application
☐ GOP Initial Permit Application	☐ Permit Revision, Renewal, or Reopening
☑ Other: semi-annual deviation report	

IV. CERTIFICATION OF TRUTH

This certification does not extend to information which is designated by the TCEQ as information for reference only.

I, Carl Holley, certify that I am the RO for this application
(Certifier Name printed or typed) *(RO or DAR)*

and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period in Section IV.A below, or on the specific date(s) in Section IV.B below, are true, accurate, and complete:

Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).

A. Time Period: From 3/8/2011 to 9/7/2011
*Start Date** *End Date**

OR

B. Specific Dates: _____ _____ _____ _____ _____ _____ _____ _____
*Date 1** *Date 2** *Date 3** *Date 4** *Date 5** *Date 6** *Date 7** *Date 8**

**The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'*

Signature: Carl Holley Signature Date: 10/6/11

Title: VP, SHES & Regulatory Compliance

Texas Operating Permit Deviation Report Form

Air CO/	RN100210806

Permit Holder Name	Intercontinental Terminals Company, LLC					Customer Number	CN603186495
Area Name						Account Number	HG-0403_N
Report Period Start	March 8, 2011	Report Period End	September 7, 2011	Operating Permit Number	1061	Report Submittal Date	October 6, 2011

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd if Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd if Applicable)		Event No. (Opt)	Deviation Period				# of Deviations	Cause of Deviation	Corrective Action Taken To Remedy or Mitigate Deviation Situation
Unit ID	Group ID						Method	Frequency		Start Date	Start Time	End Date	End Time			
N/A	N/A	N/A	VOC	30 TAC 111.111(a)(4)(A)(ii)	standard	N/A	Permit	N/A		8/3/2011	0000	8/3/2011	2359	1	As a result of TCEQ Title V Compliance Investigation, ITC received NOV for failure to maintain at least 98% of the daily flare visible observation records. No RQ exceeded.	Improved recordkeeping process.
SHDK-7	N/A	NSR Permit 1078 SC 1J	VOC	115.214(a)(3)(B)	standard	2	Permit	N/A		3/17/2011	1201	3/17/2011	1231	1	Mechanical failure of tubing run-a-round because of vibration due to ship colliding with dock. No RQ exceeded.	Secured the source, cleaned area, and repaired tubing.
TRK-A1	N/A	NSR Permit 1078 SC 1J	VOC	115.212(a)(3)(B)	standard	2	Permit	N/A		3/18/2011	0800	3/18/2011	0815	1	Product spilled from rail car dome lid due to bolts not being properly tightened. No RQ exceeded.	Dome lid was properly secured and the area was cleaned.
TK 105-1	N/A	NSR Permit 1078 SC 1J	VOC	115.212(a)(3)(B)	standard	1	Permit	N/A		3/31/2011	1050	3/31/2011	1115	1	Emission from vapor safety valve because of condensate accumulation. No RQ exceeded	Isolated the valve to stop leak, repaired valve.
TK 100-40	N/A	NSR Permit 1078 SC 1J	VOC	115.212(a)(3)(B)	standard	1	Permit	N/A		3/31/2011	2350	3/31/2011	2350	1	Mechanical failure of flex hose because of over pressurization due to thermal expansion. No RQ exceeded.	Relieved pressure from line. Replaced flex hose. Washed down manifold area.
1st80STRRACK	N/A	NSR Permit 1078 SC 1J	VOC	115.212(a)(3)(B)	standard	1	Permit	N/A		4/20/1011	1300	4/20/2011	1330	1	Overfilled tank truck because of by-pass alignment. No RQ exceeded.	Immediately shutdown movement, offloaded excess qty, washed down area.
SHPDK-7	N/A	NSR Permit 1078 SC 1J	VOC	115.214(a)(3)(B)	standard	1	Permit	N/A		4/26/2011	2200	4/26/2011	2205	1	Product dripping from a hose blind. No RQ exceeded.	Removed blind to install new gasket. Washed down area.
TK 12-25	N/A	NSR Permit 1078 SC 1J	VOC	115.212(a)(3)(B)	standard	2	Permit	N/A		5/3/2011	1321	5/3/2011	1332	1	Mechanical failure of tubing run-a-round. No RQ exceeded.	Tightened runaround fitting, stopping the leak. Washed down area.
TK 12-44	N/A	NSR Permit 1078 SC 1J	VOC	115.212(a)(3)(B)	standard	2	Permit	N/A		5/4/2011	1115	5/4/2011	1415	1	Product spilled from pig trap because of alignment of one inch bleeder valve being in the open position. No RQ exceeded.	Immediately shutdown movement, cleaned up spill, and conducted system checks.
TK 25-5/6	N/A	NSR Permit 1078 SC 1J	VOC	115.212(a)(3)(B)	standard	2	Permit	N/A		5/27/2011	1700	5/27/2011	1800	1	Leaked product from gate valve because of bonnet packing being over pressurized due to mechanical failure of pressure relief valve. No RQ exceeded.	Replaced gasket, secured valve, and cleaned area.
Traffic Scales	N/A	NSR Permit 1078 SC 1J	VOC	115.212(a)(3)(B)	standard	1	Permit	N/A		6/13/2011	0720	6/13/2011	0730	1	Product spilled from man way because dome gasket not properly aligned. No RQ exceeded.	Dome gasket was reinstalled and man way secured.
100's TT RACK	N/A	NSR Permit 1078 SC 1J	VOC	115.212(a)(3)(B)	standard	1	Permit	N/A		6/29/2011	1515	6/29/2011	1525	1	Product spilled from open bleeder because of alignment of one inch bleeder valve being in the open position. No RQ exceeded	Immediately shutdown movement and corrective action taken on operator.
TK 60-3	N/A	NSR Permit 1078 SC 1J	VOC	115.212(a)(3)(B)	standard	2	Permit	N/A		7/21/2011	1705	7/21/2011	1905	1	Mechanical failure of pump housing caused product leak. No RQ exceeded.	Secured leak, cleaned area, and pump was repaired.
SHDK-7	N/A	NSR Permit 1078 SC 1J	VOC	115.214(a)(3)(B)	standard	2	Permit	N/A		7/24/2011	1020	7/24/2011	1030	1	Leaked product from gate valve because of mechanical failure of bonnet packing. No RQ exceeded.	Immediately shut down movement which stopped the leak and repaired valve.
TK 80-17	N/A	NSR Permit 1078 SC 1J	VOC	115.212(a)(3)(B)	standard	1	Permit	N/A		7/28/2011	0500	7/28/2011	1300	1	Leaked product from gate valve because of mechanical failure of bonnet packing gland. No RQ exceeded.	Secured leak, cleaned area, and valve repaired.
New Manifold	N/A	NSR Permit 1078 SC 1J	VOC	115.212(a)(3)(B)	standard	2	Permit	N/A		8/13/2011	1035	8/13/2011	1045	1	Overfilled tank truck because of by-pass alignment. No RQ exceeded.	Immediately shutdown movement, offloaded excess quantity, and cleaned area.
TK 35-4	N/A	NSR Permit 1078 SC 1J	VOC	115.212(a)(3)(B)	standard	1	Permit	N/A		8/22/2011	0950	8/22/2011	1010	1	Leaking seal on cargo pump because pump was dead head. No RQ exceeded.	Shut down pump and repaired seal.
TK 35-4	N/A	NSR Permit 1078 SC 1J	VOC	115.212(a)(3)(B)	standard	1	Permit	N/A		8/24/2011	1330	8/24/2011	1330	1	Vapors released from pump flange due to two missing bolts. No RQ exceeded.	Valve was secured immediately and no product came out. Replaced bolts and conducted pressure test.
New Manifold	N/A	NSR Permit 1078 SC 1J	VOC	115.212(a)(3)(B)	standard	2	Permit	N/A		8/24/2011	1445	8/24/2011	1455	1	Overfilled tank truck because of improper strapping's of tank compartment provided by carrier. No RQ exceeded.	Immediately shutdown movement, transferred excess quantity, and cleaned area.
TRK-E	N/A	NSR Permit 1078 SC 1J	VOC	115.212(a)(3)(B)	standard	2	Permit	N/A		8/31/2011	1600	8/31/2011	1900	1	Mechanical failure of pump connection because of thermal expansion and cooling. No RQ exceeded.	Secured leak, cleaned area, pump repaired and pressure tested.