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

April 5, 2012

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 7009 1410 0002 3242 2458

RE: Title V Permit - Annual Compliance Certification
Period Covered: March 8, 2011 – March 7, 2012
Operating Permit No.: O-01061
Account No.: HG-0403-N
Regulated Entity No.: RN100210806; Customer No.: CN603186495

Dear Mr. Bautista:

Pursuant to 30 TAC 122.145, please find enclosed the referenced report and associated documentation for Intercontinental Terminals Company LLC, located at 1943 Independence Parkway, La Porte, Texas 77571. This submittal includes the required annual permit compliance certification forms for the referenced period, and a semi-annual deviation report covering the period from September 8, 2011, to March 7, 2012.

Please contact me at 281-884-0350, or cholley@iterm.com if you have any questions or need additional information.

Sincerely,

Carl E. Holley
Vice President, SHES and Regulatory Compliance

Enclosures

c: Administrator, EPA Region 6

RESPONSIBLE CARE®
OUR COMMITMENT TO SUSTAINABILITY

ITC is a safe and dedicated partner whose associates are recognized as proud leaders in customer care and operational excellence.

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.: O1061	E. Project No.:	
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: Title V Annual Compliance Certification	

IV. CERTIFICATION OF TRUTH

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

I, Carl E. 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 March 8, 2011 to March 7, 2012.
*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: _____ Signature Date: April 5, 2012

Title: VP of SHES & Regulatory Compliance

Texas Commission on Environmental Quality
Federal Operating Permit Form
Permit Compliance Certification - PCC (Part 1)

AIR CO/RN 100210806 /RP

Permit Holder Name	Intercontinental Terminals Company, LLC	Customer Number /CN	CN 603186495
Area Name	ITC Deer Park Terminal	Account Number	HG-0403-N
Operating Permit Number	O 1061	Report Submittal Date	April 5, 2012
Certification Period Start Date	March 8, 2011	End Date	March 7, 2012

I. Certification of Continuous Compliance with Permit Terms and Conditions (Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Response:
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?	☒ Yes ☐ No

II. Summary of Deviations (Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Response:
A. Were there any deviations from any permit requirements during the Certification Period that have *previously* been reported to the agency? If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal. Important Note: If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.	☒ Yes ☐ No
B. Were there any deviations from any terms or conditions of the permit during the Certification Period that are *currently* being submitted to the agency? If the answer to this questions is 'Yes', please include the relevant reports along with this page.	☒ Yes ☐ No

Texas Commission on Environmental Quality
Federal Operating Permit Form
Permit Compliance Certification - PCC (Part 2)

AIR CO/RN 100210806 /RP

Permit Holder Name	Intercontinental Terminals Company, LLC	**Customer Number /CN**	CN 603186495
Area Name	ITC Deer Park Terminal	**Account Number**	HG-0403-N
Operating Permit Number	0 1061	**Report Submittal Date**	April 5, 2012
Certification Period Start Date	March 8, 2011	**End Date**	March 7, 2012

Identification of Deviation Reports Submitted During the Certification Period
(Note: All reports must be certified to truth, accuracy, and completeness by the Responsible Official)

Report Date	Report Description (Name of Unit, Name of Rule, Driver for Report, etc.)	Report Submitted To	Report Previously Certified?
Oct 5, 2011	Title V, 30 TAC 122.145 Semi-Annual Deviation Report for 3/8/2011 thru 9/7/2011	Executive Director c/o Mr. Manuel Bautista	☒ Yes ☐ No
			☐ Yes ☐ No
			☐ Yes ☐ No
			☐ Yes ☐ No
			☐ Yes ☐ No
			☐ Yes ☐ No

Texas Commission on Environmental Quality
Federal Operating Permit Form
PCC - Monitoring Options Selected (Part 3)

AIR CO/RN 100210806 /RP

Permit Holder Name	Intercontinental Terminals Company, LLC	Customer Number	CN 603186495
Area Name	ITC Deer Park Terminal	Account Number	HG-0403-N
Operating Permit Number	0 1061	Report Submittal Date	April 5, 2012
Certification Period Start Date	March 8, 2011	End Date	March 7, 2012

ID Number		Regulatory Requirement (Rule or Permit No. and Prov.)	Pollutant Monitored	SOP or GOP Index Number	Monitoring Option Used	Date		Description/Comments
Unit ID	Group ID GRPXXXXXXX				Specification Citation	Begin	End	

Reset Form

Print Form

Texas Operating Permit Deviation Report Form

Permit Holder Name	Intercontinental Terminals Company LLC					Customer Number	CN603186495
Area Name						Account Number	HG-0403-N
Report Period Start Date	8 Sep 11	Report Period End Date	7 Mar 12	Operating Permit Number		Report Submittal Date	6 Apr 12

AIR CO/ RN100210806 / RP

Event No.	STEERS Incident No.	ID Number		Term & Condition No. / Permit Provision Number	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Requirements		Deviation Period				Number of Deviations	Cause of Deviation	Corrective Action Taken To Remedy or Mitigate Deviation Situation
		Unit ID	Group ID						Method	Frequency	Start		End				
											Date	Time	Date	Time			
1	NA	1st 80's TR Rack	NA	14	VOC	NSR Permit 1078 SC 1J	standard	1	Permit	NA	9/8/2011	1002	9/8/2011	1007	1	Product leaked from a tank truck dome lid due to inadequately tightened dome lid bolts after loading was completed. The air RQ was not exceeded.	The dome lid was secured and residual product removed. Necessary cleanup actions were undertaken.
2	NA	TRK - G1	NA	14	methanol	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	9/9/2011	1330	9/9/2011	1340	1	During the process of disconnecting a rail car from the product transfer system to investigate a slow transfer rate the rail car control valve was left partially open. When the product hose was disconnected product was released into the surrounding secondary containment area. The air RQ was not exceeded.	The valve was secured preventing further product release and necessary cleanup actions undertaken.
3	NA	12-36 / 15-2	NA	NA	VOC	116.110(a)	standard	NA	NA	NA	9/10/2011	0800	9/11/2011	1800	1	Product piping was not properly secured prior to a product transfer. A plug was inadvertantly not installed allowing to escape the piping system. The release was into secondary containment. The air RQ was not exceeded.	Product piping was secured by installing a plug, product was recovered and necessary cleanup actions undertaken.
4	NA	160-2	NA	NA	VOC	116.110(a)	standard	NA	NA	NA	9/12/2011	0130	9/12/2011	1000	1	A gasket failure on an air sparging system associated with tank 160-2 resulted in a product release into the surrounding containment area. The air RQ was not exceeded.	Upon discovery of the leak the control valves were immediately closed and the leak stopped. The gasket was repaired and procedures modified to help prevent a future event. Necessary cleanup actions were undertaken and all residual removed on the day of the event.
5	NA	TRK-A2	NA	14	VOC	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	9/16/2011	0150	9/16/2011	0205	1	A railcar was overfilled resulting in a release into the surrounding containment area. The air RQ was not exceeded.	Ensured railcar was filled to proper level and necessary cleanup actions undertaken.
6	NA	TRK-G	NA	14	methanol	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	9/16/2011	1250	9/16/2011	1900	1	During a truck loading operation the tank truck trailer began leaking at a location on the trailer shell. The tank car was evaluated prior to loading per normal operations procedures and there was no indication of a trailer problem.	The trailer leak was outside of the control of ITC. Once the leak was detected, the product transfer was stopped and product transferred to another tank trailer. Necessary cleanup actions were undertaken.
7	NA	TRK-G	NA	14	VOC	NSR Permit 1078 SC 1J	standard	1	Permit	NA	9/22/2011	1630	9/22/2011	1715	1	A lube oil release occurred during a tank truck transfer operation. The air RQ was not exceeded.	Necessary cleanup actions were undertaken.
8	NA	BGDK-7	NA	NA	xylene	116.110(a)	standard	NA	NA	NA	9/23/2011	1315	9/23/2011	1330	1	A hose gasket failed due to thermal expansion and the associated increase in pressure, allowing product to leak onto the dock. The hose was isolated and did not have pressure relief capabilities. The air RQ was not exceeded.	Replaced the hose gasket and tested it to verify integrity. Cleaned up the impacted containment area, and ensured that pressure relief capability was in place. Thermal expansion training conducted with site personnel.
9	NA	2nd 12s TR Rack	NA	14	vinyl acetate	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	NA	NA	9/20/2011	1500	9/20/2011	1510	1	The tank truck trailer started leaking from the internal valve during the transfer operation. The leak was discovered when the loading hose was removed. The air RQ was not exceeded.	The internal valve leak was outside of the control of ITC. Once the leak was detected, the product transfer was stopped, released material cleaned, and the product transferred to another tank trailer. Transfer to the second trailer completed at 2015.
10	NA	NA	NA	NA	Aromatic Concentrate	116.110(a)	standard	1	NA	NA	10/9/2011	1500	10/9/2011	1505	1	A product transfer hose in the 1st 80s manifold failed releasing product ran into the secondary containment area. The air RQ was not exceeded.	The area involved in the release was cleaned and the failed hose replaced.
11	NA	TRK-G	NA	14	methanol	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	10/7/2011	0435	10/7/2011	0900	1	During a tank truck loading operation the trailer began leaking at a location on the trailer shell. The tank car was evaluated prior to loading per normal operations procedures and there was no indication of a trailer problem.	The trailer leak was outside of the control of ITC. Once the leak was detected, the product transfer was stopped, released material cleaned, and the product transferred to another tank trailer.
12	NA	TRK-A1	NA	14	VOC	NSR Permit 1078 SC 1J	standard	1	Permit	NA	10/14/2011	1540	10/14/2011	1550	1	During a tank truck to rail car transfer, a release of product occurred due to an overpressure in the rail car caused by the introduction of nitrogen into the car. The air RQ was not exceeded.	The transfer was immediately shut down, the area involved in the releasae was cleaned and the transfer completed.
13	NA	TRK-G	NA	14	VOC	NSR Permit 1078 SC 1J	standard	1	Permit	NA	10/18/2011	1530	10/18/2011	1545	1	During a tank truck loading operation the trailer started leaking around the gasket of the external valve. The air RQ was not exceeded.	The trailer valve leak was outside of the control of ITC. Once the leak was detected, the product transfer was stopped, the valve repaired and necessary cleanup actions undertaken. The transfer was completed once the valve was repaired.
14	NA	Tank 35-18	NA	NA	VOC	116.110(a)	standard	NA	NA	NA	10/19/2011	0800	10/19/2011	0810	1	A small leak occurred on the tank manway allowing lube to drip into the containment area. The air RQ was not exceeded.	The manway bolts were tightened and the leak stopped. Necessary cleanup actions were undertaken.
15	NA	TRK-G2	NA	14	methanol	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	10/26/2011	0930	10/26/2011	0940	1	During a rail car transfer the car was overpressured resulting in a small product release. The air RQ was not exceeded.	The transfer was immediately shut down, the area involved in the releasae was cleaned and the transfer completed.

Texas Operating Permit Deviation Report Form

Permit Holder Name	Intercontinental Terminals Company LLC					Customer Number	CN603186495
Area Name						Account Number	HG-0403-N
Report Period Start Date	8 Sep 11	Report Period End Date	7 Mar 12	Operating Permit Number		Report Submittal Date	6 Apr 12

AIR CO/ RN100210806 / RP

Event No.	STEERS Incident No.	ID Number		Term & Condition No. / Permit Provision Number	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Requirements		Deviation Period				Number of Deviations	Cause of Deviation	Corrective Action Taken To Remedy or Mitigate Deviation Situation
		Unit ID	Group ID						Method	Frequency	Start		End				
											Date	Time	Date	Time			
16	NA	NA	NA	NA	1,3-Butadiene	116.110(a)	standard	NA	NA	NA	10/31/2011	1910	10/31/2011	1930	1	A release occurred due to a small crack in a piping weld. The air RQ was not exceeded.	The piping sections was immediately isolated and then decommissioned to a control device. The piping was repaired and returned to service.
17	NA	1st 80's TR Rack	NA	14	xylene	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	10/31/2011	2200	10/31/2011	2215	1	During a tank truck loading operation the trailer external valve began leaking. A small amount of product was released into the secondary containment area. The air RQ was not exceeded.	The trailer leak was outside of the control of ITC. Once the leak was detected, the product transfer was stopped, released material cleaned, and the trailer emptied to prevent further leakage.
18	NA	TRK-B2	NA	NA	xylene	116.110(a)	standard	NA	NA	NA	11/2/2011	1055	11/2/2011	1115	1	A flange gasket on a piping system failed as a result of an overpressure situation, caused by thermal expansion. The air RQ was not exceeded.	The piping section was immediately depressurized and isolated. The flange was repaired and the impacted area cleaned. Once repaired the piping was returned to service. Thermal expansion training was conducted with site personnel.
19	NA	BGDK-4	NA	NA	Non-VOC (acetone)	116.110(a)	standard	NA	Permit	NA	11/2/2011	1300	11/2/2011	1330	1	A leak occurred at a blind flange gasket due to high pressure and a missing bolt. The air RQ was not exceeded.	The system was immediately depressurized which stopped the leak. The flange was checked and bolted - no further issues were found.
20	NA	BGDK-7	NA	NA	VOC	116.110(a)	standard	NA	Permit	NA	11/7/2011	0825	11/7/2011	1225	1	A flange gasket on a piping system failed as a result of an overpressure situation caused by thermal expansion. The air RQ was not exceeded.	The piping section was immediately depressurized and isolated. The flange was repaired and the impacted area cleaned. Once repaired the piping was returned to service. Thermal expansion training was conducted with site personnel.
21	NA	NA	NA	NA	1,3-Butadiene	116.110(a)	standard	NA	NA	NA	11/8/2011	0730	11/8/2011	0745	1	Product piping developed a small pinhole type leak resulting in a minimal release of butadiene. The leak occurred due to metal fatigue and potentially from pump vibration effects.	The piping section was immediately isolated and then decommissioned to the control device. The piping was repaired and returned to service.
22	NA	TRK-G	NA	14	methanol	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	11/10/2011	0510	11/10/2011	1000	1	During the loading operation the tank truck trailer began leaking at a location on the trailer shell, underneath the external insulation The trailer was evaluated prior to loading per normal operations procedures and there was no indication of a shell issue. The air RQ was not exceeded.	The trailer leak was outside of the control of ITC. Once the leak was detected, the product transfer was stopped, released material cleaned, and the product transferred to another tank trailer.
23	NA	1st 12's TR Rack	NA	14	vinyl acetate	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	11/10/2011	1600	11/10/2011	2100	1	During the loading operation the tank truck trailer began leaking at a location on the trailer shell, underneath the external insulation The trailer was evaluated prior to loading per normal operations procedures and there was no indication of a shell issue. The air RQ was not exceeded.	The trailer leak was outside of the control of ITC. Once the leak was detected, the product transfer was stopped, released material cleaned, and the product transferred to another tank trailer.

Texas Operating Permit Deviation Report Form

Permit Holder Name	Intercontinental Terminals Company LLC					Customer Number	CN603186495
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		Unit ID	Group ID						Method	Frequency	Start		End				
											Date	Time	Date	Time			
24	NA	TRK-H	NA	14	phenol	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	11/16/2011	1120	11/16/2011	1250	1	During a truck loading operation the transfer pump began leaking. Additionally, a small amount of product leaked from the transfer rack loading arm.	The pump was isolated and then repaired. All residual product was removed and necessary cleanup actions undertaken.
25	NA	30-2	NA	NA	VOC	116.110(a)	standard	NA	NA	NA	12/13/2011	2330	12/14/2011	0130	1	A pump seal leak resulted in a release of lube oil into the secondary containment area. The air RQ was not exceeded.	The pump was isolated and then repaired. All residual product was removed and necessary cleanup actions undertaken.
26	NA	TRK-G1	NA	14	VOC	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	12/15/2011	0045	12/15/2011	0110	1	During the start of a rail car loading operation product was released from the product loading arm into the rail car loading area. The release occurred due to an unsecured control valve. The air RQ was not exceeded.	The transfer was immediately terminated. All residual product was removed and the impacted area cleaned.
27	NA	TRK-B1	NA	14	VOC	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	12/31/2011	0100	12/31/2011	0145	1	A tank car was overloaded resulting in a product release into the surrounding containment area. The air RQ was not exceeded.	The transfer was immediately terminated upon discovery of the release. All residual product was removed and necessary cleanup actions undertaken.
28	NA	12-51	NA	14	VOC	NSR Permit 1078 SC 1D 40 CFR 60.113b	standard	NA	Permit	1 / 10 years	1/17/2012	0001	2/20/2012	0800	1	ITC was unable to perform the internal inspection within 10 years of the last internal inspection because of operational issues and customer needs/demands. External inspections were conducted annually as required by regulation, and revealed no indications of IFR problems.	The tank was removed from service and cleaning commenced on or about 2/20/12, and the internal inspection conducted thereafter. Minor revisions to ITC internal policies have been made to help ensure that tanks can be removed from service within the required 10-year inspection interval. These changes have been communicated throughout Terminal Management.
29	NA	TRK-G1	NA	14	methanol	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	1/17/2012	1400	1/17/2012	1415	1	A tank car was overloaded resulting in a product release. The air RQ was not exceeded.	When the overfill was discovered the transfer was shut down, and necessary cleanup actions undertaken.
30	NA	TRK-H	NA	14	phenol	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	1/20/2012	1430	1/20/2012	1445	1	During the start of a tank truck transfer product was released from the trailer bottom outlet valve. The air RQ was not exceeded.	Once the leak was detected, the product transfer was stopped the valve secured and necessary cleanup actions undertaken.
31	NA	TRK-H	NA	14	methanol	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	2/16/2012	1245	2/16/2012	1545	1	During the loading operation the tank truck trailer began leaking from a cracked weld on the trailer shell. The tank car was evaluated prior to loading per normal operations procedures and there was no indication of a shell issue. The air RQ was not exceeded.	The trailer leak was outside of the control of ITC. Once the leak was detected, the product transfer was stopped and necessary cleanup actions undertaken.
32	NA	TRK-G	NA	14	methanol	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	2/22/2012	0815	2/22/2012	1115	1	During the loading operation the tank truck trailer began leaking at a location on the trailer shell, underneath the external insulation The trailer was evaluated prior to loading per normal operations procedures and there was no indication of a shell issue. The air RQ was not exceeded.	The trailer leak was outside of the control of ITC. Once the leak was detected, the product transfer was stopped, released material cleaned, and the product transferred to another tank trailer.

Texas Operating Permit Deviation Report Form

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AIR CO/ RN100210806 / RP

Event No.	STEERS Incident No.	ID Number		Term & Condition No. / Permit Provision Number	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Requirements		Deviation Period				Number of Deviations	Cause of Deviation	Corrective Action Taken To Remedy or Mitigate Deviation Situation
		Unit ID	Group ID						Method	Frequency	Start		End				
											Date	Time	Date	Time			
33	NA	TRK-G	NA	14	methanol	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	2/24/2012	0900	2/24/2012	0915	1	During the loading operation the tank truck trailer began leaking from the internal valve. The trailer was evaluated prior to loading per normal operations procedures and there was no indication of an issue. The air RQ was not exceeded.	The trailer internal valve leak was outside of the control of ITC. Once the leak was detected, the product transfer was stopped, released material cleaned, and the product transferred from the trailer into another tank truck trailer.
34	NA	TRK-G2	NA	14	methanol	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	2/28/2012	0130	2/28/2012	0145	1	During a railcar loading operation the car began leaking from the bottom flange. The air RQ was not exceeded.	The rail car valve leak was outside of the control of ITC. Once the leak was detected, the product transfer was stopped and necessary cleanup actions undertaken.
35	NA	TRK-H	NA	14	methanol	115.212(a)(3)(B) NSR Permit 1078 SC 1J	standard	1	Permit	NA	2/29/2012	0100	2/29/2012	0400	1	During a truck loading operation the external valve packing began to leak. The air RQ was not exceeded.	The trailer valve leak was outside of the control of ITC. Once the leak was detected, the product transfer was stopped, released material cleaned, and the product transferred from the trailer into a railcar.