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

October 1, 2008

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

Certified Mail 7003 1010 0002 1039 7495
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 Ms. Vasse:

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

Sincerely,

Carl E. Holley
Vice President, SHE and
Regulatory Compliance

ms
Enclosures
c: Mr. Ralph Chaiet, P.E., Response Management Associates, Inc.

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 DAR 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 3/8/2008 to 9/7/2008
*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: 093008

Title: VP SHE & Regulatory Compliance

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/ RN 100210806 /RP

Image Field

Permit Holder Name	Intercontinental Terminals Company LLC	Customer Number	CN 603186498
Area Name	Deer Park Terminal	Account Number (XX-XXXX-XX)	HG-0403-N

Report Period Start Date	Mar 8, 2008	Report Period End Date	Sep 7, 2008	Operating Permit Number	0 1061	Report Submittal Date	10/1/2008

Operating Permit Requirement for Which Deviations are Being Reported

ID Number	Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID Group ID GRP GPITC17		VOC	115.212(a)(b)	STANDARD	1	Permit	

Dev Item No.	STEERS Incident No	Deviation Period Start Date	Start Time	End Date	End Time	No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Mar 9, 2008	1500	Mar 9, 2008	1502		pin hole leak in hose at Dock #6 acetone - 0.25 gallons inside containment	stop movement, replace hose. Cleanup.
		Mar 18, 2008	1145	Mar 18, 2008	1150		leak in hose at connection with barge at Dock #10 Methanol - 0.12 gallons inside containment.	stop movement, replace hose gasket. Cleanup.
		Mar 18, 2008	08:25	Mar 18, 2008	08:35		Leaking Gasket on the #71 line at Dock # 1 xylene - 420 gallons inside containment	stopped movement, replace gasket, cleanup.
		May 29, 2008	1425	May 29, 2008	1435		Spool piece bleeder valve leaking at dock #1. Benzene - 1 gallon inside containment	stopped movement, replace bleeder valve, cleanup.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence from supporting this deviation report?	☐ Yes ☒ No

TCEQ-10101 [06/08]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/ RN 100210806 /RP

Image Field

Permit Holder Name	Intercontinental Terminals Company LLC	Customer Number	CN 603186498
Area Name	Deer Park Terminal	Account Number (XX-XXXX-XX)	HG-0403-N

Report Period Start Date	Mar 8, 2008	Report Period End Date	Sep 7, 2008	Operating Permit Number	0 1061	Report Submittal Date	10/1/2008

Operating Permit Requirement for Which Deviations are Being Reported

ID Number	Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID Group ID GRP GPITC17		VOC	115.212(a)(b)	STANDARD	1	Permit	

Dev Item No.	STEERS incident No	Deviation Period Start Date	Start Time	End Date	End Time	No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Jun 2, 2008	08:00	Jun 2, 2008	08:05		pin hole leak in hose at Dock #2 butyl acrylate - 0.12 gallons inside containment	stop movement, replace hose. Cleanup.
		Jun 15, 2008	1810	Jun 15, 2008	1815		Barge employee blew out the pump seal while decommissioning hose. Butanol - 20 gallons inside containment	stop movement, replace pump seal. Cleanup.
		Jul 2, 2008	1010	Jul 2, 2008	1015		pin hole leak in hose at Dock #1 toluene - 0.12 gallons inside containment	stopped movement, replace hose, cleanup.
		Aug 14, 2008	09:25	Aug 14, 2008	09:30		Spool piece bleeder valve leaking at dock #1. Benzene - 1 gallon inside containment	stopped movement, replace bleeder valve, cleanup.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence from supporting this deviation report?	☐ Yes ☒ No

TCEQ-10101 [06/08]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/ RN 100210806 /RP

Image Field

Permit Holder Name	Intercontinental Terminals Company LLC	Customer Number	CN 603186498
Area Name	Deer Park Terminal	Account Number (XX-XXXX-XX)	HG-0403-N

Report Period Start Date	Mar 8, 2008	Report Period End Date	Sep 7, 2008	Operating Permit Number	0 1061	Report Submittal Date	10/1/2008

Operating Permit Requirement for Which Deviations are Being Reported

ID Number	Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID Group ID GRP GPITC17		VOC	115.212(a)(b)	STANDARD	1	Permit	

Dev Item No.	STEERS Incident No	Deviation Period Start Date	Deviation Period Start Time	Deviation Period End Date	Deviation Period End Time	No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Aug 22, 2008	1404	Aug 22, 2008	1410		pin hole leak in hose at Dock #1 acetone - 2 gallons inside containment	stop movement, replace hose. Cleanup.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence from supporting this deviation report?	☐ Yes ☒ No

TCEQ-10101 [06/08]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/ RN 100210806 /RP

Image Field

Permit Holder Name	Intercontinental Terminals Company LLC	Customer Number	CN 603186498
Area Name	Deer Park Terminal	Account Number (XX-XXXX-XX)	HG-0403-N

Report Period Start Date	Mar 8, 2008	Report Period End Date	Sep 7, 2008	Operating Permit Number	0 1061	Report Submittal Date	10/1/2008

Operating Permit Requirement for Which Deviations are Being Reported

ID Number	Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID Group ID GRP GPITC16		VOC	NSR 1078 SC 1(J)	STANDARD	1	Permit	

Dev Item No.	STEERS incident No	Deviation Period Start Date	Start Time	End Date	End Time	No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Mar 14, 2008	1430	Mar 14, 2008	1435		small leak on filter pot valve at TK 50-3 Crude Acrylic Acid - 2 gallons inside containment	stop activity, repair valve, cleanup .
		Mar 15, 2008	1115	Mar 15, 2008	1120		Pin hole leak in the #75 dock line at Dock #5 No. 6 Fuel Oil - 0.5 gal	stop activity, replace dock hose, cleanup.
		Apr 4, 2008	0600	Apr 4, 2008	0605		Improper hook up while barge loading. Star 6 Oil - 0.12 gallons inside containment.	cleanup, retrain operator.
		Apr 12, 2008	1500	Apr 12, 2008	1515		compressor valve failure on TK 12-6 created leak at the hose. No. 2 Oil - 5 gallons inside containment	replace equipment, cleanup.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence from supporting this deviation report?	☐ Yes ☒ No

TCEQ-10101 [06/08]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/ RN 100210806 /RP

Image Field

Permit Holder Name	Intercontinental Terminals Company LLC	Customer Number	CN 603186498
Area Name	Deer Park Terminal	Account Number (XX-XXXX-XX)	HG-0403-N

Report Period Start Date	Mar 8, 2008	Report Period End Date	Sep 7, 2008	Operating Permit Number	0 1061	Report Submittal Date	10/1/2008

Operating Permit Requirement for Which Deviations are Being Reported

ID Number	Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID Group ID GRP GPITC16		VOC	NSR 1078 SC 1(J)	STANDARD	1	Permit	

Dev Item No.	STEERS incident No	Deviation Period Start Date	Start Time	End Date	End Time	No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Apr 14, 2008	0640	Apr 14, 2008	0645		missing dome lid gasket on tank truck after loading. Yubase 6 - 2 gallons	stop activity, install gasket, cleanup .
		Apr 15, 2008	1140	Apr 15, 2008	1142		Improper loading procedure resulted in leak from bottom valve of loader at Outback truck rack. Lube Oil - 0.5 gallons	stop activity, shut valve, cleanup.
		May 21, 2008	0110	May 21, 2008	0115		leak from bad gasket on 3 in. loading line at 80-1 tank car loading spot. YUBase 4 - 1 gallon inside containment	stop movement, cleanup, replace gasket..
		May 22, 2008	1030	May 22, 2008	1035		hose leak while loading a rail car. Butyl Acrylate - 0.12 gallons inside containment	stop movement, replace hose, cleanup.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence from supporting this deviation report?	☐ Yes ☒ No

TCEQ-10101 [06/08]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/ RN 100210806 /RP

Image Field

Permit Holder Name	Intercontinental Terminals Company LLC	Customer Number	CN 603186498
Area Name	Deer Park Terminal	Account Number (XX-XXXX-XX)	HG-0403-N

Report Period Start Date	Mar 8, 2008	Report Period End Date	Sep 7, 2008	Operating Permit Number	0 1061	Report Submittal Date	10/1/2008

Operating Permit Requirement for Which Deviations are Being Reported

ID Number	Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID Group ID GRP GPITC16		VOC	NSR 1078 SC 1(J)	STANDARD	1	Permit	

Dev Item No.	STEERS Incident No	Deviation Period Start Date	Start Time	End Date	End Time	No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		May 29, 2008	1425	May 29, 2008	1438		Pin hole leak in dock hose. YUBase 3 - 0.12 gallons inside containment	stop activity, replace dock hose, cleanup .
		Jun 11, 2008	04:30	Jun 11, 2008	04:35		Leaking pump seal at TK 25-5 Acrylic Acid - 0.12 gallons inside containment	stop activity, replace pump seal, cleanup.
		Jun 12, 2008	2135	Jun 12, 2008	2140		overloaded railcar at Outback Rail Rack due to gauging error. Resin Oil - 10 gallons inside containment	stop movement, off-load excess product, cleanup, retrain operator.
		Jun 20, 2008	04:35	Jun 20, 2008	04:40		Tank truck leaking from open and uncapped bleeder valve. YUBase Oil - 2 gallons	stop movement, close valve and cap. Cleanup. Retrain operator.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence from supporting this deviation report?	☐ Yes ☒ No

TCEQ-10101 [06/08]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/ RN 100210806 /RP

Image Field

Permit Holder Name	Intercontinental Terminals Company LLC	Customer Number	CN 603186498
Area Name	Deer Park Terminal	Account Number (XX-XXXX-XX)	HG-0403-N

Report Period Start Date	Mar 8, 2008	Report Period End Date	Sep 7, 2008	Operating Permit Number	0 1061	Report Submittal Date	10/1/2008

Operating Permit Requirement for Which Deviations are Being Reported

ID Number	Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID Group ID GRP GPITC16		VOC	NSR 1078 SC 1(J)	STANDARD	1	Permit	

Dev Item No.	STEERS Incident No	Deviation Period Start Date	Start Time	End Date	End Time	No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Jun 20, 2008	1620	Jun 20, 2008	1622		spill caused by incorrect procedure during hose disconnect. solvent 100 - 2 gallons inside containment	stop activity, cleanup, retrain.
		Jun 24, 2008	1330	Jun 24, 2008	1335		spill caused by incorrect procedure during hose disconnect. butyl acrylate - 0.25 gallons inside containment	stop activity, cleanup, retrain.
		Jul 6, 2008	1230	Jul 6, 2008	1233		spill caused by incorrect procedure during barge hose connect. No. 6 oil - 3 gallons inside containment	stop movement, cleanup, retrain operator.
		Jul 12, 2008	1615	Jul 12, 2008	1620		Pin hole leak on hose at Dock #2 YUbase Oil - 0.5 gallons	stop movement, replace hose. Cleanup.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence from supporting this deviation report?	☐ Yes ☒ No

TCEQ-10101 [06/08]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/ RN 100210806 /RP

Image Field

Permit Holder Name	Intercontinental Terminals Company LLC	Customer Number	CN 603186498
Area Name	Deer Park Terminal	Account Number (XX-XXXX-XX)	HG-0403-N

Report Period Start Date	Mar 8, 2008	Report Period End Date	Sep 7, 2008	Operating Permit Number	0 1061	Report Submittal Date	10/1/2008

Operating Permit Requirement for Which Deviations are Being Reported

ID Number	Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID Group ID GRP GPITC16		VOC	NSR 1078 SC 1(J)	STANDARD	1	Permit	

Dev Item No.	STEERS Incident No	Deviation Period Start Date	Start Time	End Date	End Time	No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Jul 28, 2008	05:40	Jul 28, 2008	05:50		pin hole leak in hose at Dock #1 No. 6 Fuel Oil - 0.25 gallons inside containment	stop movement, replace hose. Cleanup.
		Sep 6, 2008	1005	Sep 6, 2008	1006		pin hole leak in hose at Dock #5 Solvent 100 - 0.5 gallons inside containment.	stop movement, replace hose. Cleanup.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence from supporting this deviation report?	☐ Yes ☒ No

TCEQ-10101 [06/08]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/ RN 100210806 /RP

Image Field

Permit Holder Name	Intercontinental Terminals Company LLC	Customer Number	CN 603186498
Area Name	Deer Park Terminal	Account Number (XX-XXXX-XX)	HG-0403-N

Report Period Start Date	Mar 8, 2008	Report Period End Date	Sep 7, 2008	Operating Permit Number	0 1061	Report Submittal Date	10/1/2008

Operating Permit Requirement for Which Deviations are Being Reported

ID Number	Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID Group ID GRP GPITC16		VOC	115.212(a)(3)(B)	STANDARD	1	Permit	

Dev Item No.	STEERS incident No	Deviation Period Start Date	Start Time	End Date	End Time	No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Mar 15, 2008	1515	Mar 15, 2008	1520	1	Ruptured hose due to not relieving pressure from line during previous movement . Butyl Acrylate - 84 gallons inside containment	Removed product from hose, replaced hose and cleaned up area. Re-trained operator
		Mar 24, 2008	1010	Mar 24, 2008	1015	1	Tank 35-14 hose separated from its webbing at the tank. Butyl Acrylate - 2100 gallons inside containment	Removed product from hose, replaced hose and cleaned up area.
		Apr 3, 2008	1000	Apr 3, 2008	1010	1	Leak caused by bad gasket during rail car loading Phenol - 42 gallons inside containment	stopped movement, replaced gasket, cleanup area.
		Apr 18, 2008	1945	Apr 18, 2008	1950	1	Product dripping from the flare line during truck loading Toluene - 2 gallons inside containment	stopped movement, removed liquid from flare line, cleaned area.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence from supporting this deviation report?	☐ Yes ☒ No

TCEQ-10101 [06/08]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/ RN 100210806 /RP

Image Field

Permit Holder Name	Intercontinental Terminals Company LLC	Customer Number	CN 603186498
Area Name	Deer Park Terminal	Account Number (XX-XXXX-XX)	HG-0403-N

Report Period Start Date	Mar 8, 2008	Report Period End Date	Sep 7, 2008	Operating Permit Number	0 1061	Report Submittal Date	10/1/2008

Operating Permit Requirement for Which Deviations are Being Reported

ID Number	Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID Group ID GRP GPITC16		VOC	115.212(a)(3)(B)	STANDARD	1	Permit	

Dev Item No.	STEERS Incident No	Deviation Period Start Date	Start Time	End Date	End Time	No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Apr 22, 2008	2245	Apr 22, 2008	2250	1	tank truck overloaded. Loader misread meter. methanol - 1 gallon inside containment	stopped movement, removed excess, cleaned up, re-trained operator
		Apr 29, 2008	2330	Apr 29, 2008	2335	1	Rail car auxiliary dome vapor plug loose causing small leak. methanol - < 1 gallon inside containment	Removed product from hose, replaced hose and cleaned up area.
		May 1, 2008	1430	May 1, 2008	1433	1	Tank car released product through open liquid line. Vinyl Acetate Monomer - 1 gallon inside containment	stopped movement, cleanup area, re-trained operator
		May 3, 2008	1000	May 3, 2008	1010	1	Leak from the 80's truck rack vapor system Toluene - 0.5 gallons	stopped movement, removed liquid from vapor system, cleaned area.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence from supporting this deviation report?	☐ Yes ☒ No

TCEQ-10101 [06/08]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/ RN 100210806 /RP

Image Field

Permit Holder Name	Intercontinental Terminals Company LLC	Customer Number	CN 603186498
Area Name	Deer Park Terminal	Account Number (XX-XXXX-XX)	HG-0403-N

Report Period Start Date	Mar 8, 2008	Report Period End Date	Sep 7, 2008	Operating Permit Number	0 1061	Report Submittal Date	10/1/2008

Operating Permit Requirement for Which Deviations are Being Reported

ID Number	Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID							
Group ID GRP GPITC16		VOC	115.212(a)(3)(B)	STANDARD	1	Permit	

Dev Item No.	STEERS Incident No	Deviation Period Start Date	Start Time	End Date	End Time	No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		May 5, 2008	01:00	May 5, 2008	01:05		tank truck overload scale clerk calculation error Methanol - 3 gallons inside containment	off-load excess, cleanup, re-train scale clerk.
		May 12, 2008	1315	May 12, 2008	1320		rail car overload operator error Methanol - 1 gallon inside containment	off-load excess, cleanup, re-train operator
		May 13, 2008	1415	May 13, 2008	1425		rail car overload operator error Methanol - 10 gallon inside containment	off-load excess, cleanup, re-train operator
		May 23, 2008	1500	May 23, 2008	1510		Bad gasket creating leak while loading tank truck Isoprene - 3 gallons inside containment	stop movement, replace gasket, clean up area
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence from supporting this deviation report?	☐ Yes ☒ No

TCEQ-10101 [06/08]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/ RN 100210806 /RP

Image Field

Permit Holder Name	Intercontinental Terminals Company LLC	Customer Number	CN 603186498
Area Name	Deer Park Terminal	Account Number (XX-XXXX-XX)	HG-0403-N

Report Period Start Date	Mar 8, 2008	Report Period End Date	Sep 7, 2008	Operating Permit Number	0 1061	Report Submittal Date	10/1/2008

Operating Permit Requirement for Which Deviations are Being Reported

ID Number	Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID Group ID GRP GPITC16		VOC	115.212(3)(B)	STANDARD	1	Permit	

Dev Item No.	STEERS Incident No	Deviation Period Start Date	Start Time	End Date	End Time	No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Jun 5, 2008	01:00	Jun 5, 2008	01:05		leak in hose at TK 80-18 Ethylene Dichloride - 0.12 gallons inside containment	stop movement, replace hose. Cleanup.
		Jun 17, 2008	1330	Jun 17, 2008	1335		pipeline leak at waterfront manifold. Naptha - 1 gallon inside containment	stopped movement, decommissioned line, repaired leak. Clean up.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence from supporting this deviation report?	☐ Yes ☑ No

TCEQ-10101 [06/08]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/ RN 100210806 /RP

Image Field

Permit Holder Name	Intercontinental Terminals Company LLC	Customer Number	CN 603186498
Area Name	Deer Park Terminal	Account Number (XX-XXXX-XX)	HG-0403-N

Report Period Start Date	Mar 8, 2008	Report Period End Date	Sep 7, 2008	Operating Permit Number	0 1061	Report Submittal Date	10/1/2008

Operating Permit Requirement for Which Deviations are Being Reported

ID Number	Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID Group ID GRP GPITC16		VOC	115.212(a)(3)(B)	STANDARD	1	Permit	

Dev Item No.	STEERS incident No	Deviation Period Start Date	Start Time	End Date	End Time	No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Jun 10, 2008	21:45	Jun 10, 2008	21:50		tank truck overload operator gauging error Crude Isoprene - 20 gallons inside containment	off-load excess, cleanup, re-train operator.
		Jun 6, 2008	13:10	Jun 6, 2008	13:15		Small spill from improper hook up of tank truck. Isoprene 1 gallon inside containment	cleanup, re-train operator
		Jun 30, 2008	1450	Jun 30, 2008	1455		After rail car loading job, operator noticed a leak on the belly cap. Toluene - 2 gallons inside containment	tank car off-loaded and repaired. Area cleaned up.
		Jul 1, 2008	0015	Jul 1, 2008	0025		Leaking run-around tube at tank100-28 Ethanol -1 gallon inside containment	stop movement, repair run-around tubing, clean up area
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence from supporting this deviation report?	☐ Yes ☒ No

TCEQ-10101 [06/08]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/ RN 100210806 /RP

Image Field

Permit Holder Name	Intercontinental Terminals Company LLC	Customer Number	CN 603186498
Area Name	Deer Park Terminal	Account Number (XX-XXXX-XX)	HG-0403-N

Report Period Start Date	Mar 8, 2008	Report Period End Date	Sep 7, 2008	Operating Permit Number	0 1061	Report Submittal Date	10/1/2008

Operating Permit Requirement for Which Deviations are Being Reported

ID Number	Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID Group ID GRP GPITC16		VOC	115.212(a)(3)(B)	STANDARD	1	Permit	

Dev Item No.	STEERS Incident No	Deviation Period Start Date	Start Time	End Date	End Time	No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Jul 10, 2008	2230	Jul 10, 2008	2235		Operator error while operating the loading arm for rail car loading Diethylene Glycol - 5 gallons into containment	stop activity, cleanup, re-train operator.
		Jul 20, 2008	13:10	Jul 20, 2008	13:15		missing gasket on #52 line causing leak D- Methyl Methacrylate - 6 gallons into containment	cleanup, replace gasket
		Aug 2, 2008	1400	Aug 2, 2008	1425		Pump seal leak on cargo pump. Propylene - 6 lbs	tank car off-loaded and repaired. Area cleaned up.
		Aug 12, 2008	1115	Aug 12, 2008	1125		Flange leak on the main tank lateral at 25-2 1,3-Butadiene - 7 lbs	decommissioned line and replaced gasket
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence from supporting this deviation report?	☐ Yes ☒ No

TCEQ-10101 [06/08]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/ RN 100210806 /RP

Image Field

Permit Holder Name	Intercontinental Terminals Company LLC	Customer Number	CN 603186498
Area Name	Deer Park Terminal	Account Number (XX-XXXX-XX)	HG-0403-N

Report Period Start Date	Mar 8, 2008	Report Period End Date	Sep 7, 2008	Operating Permit Number	0 1061	Report Submittal Date	10/1/2008

Operating Permit Requirement for Which Deviations are Being Reported

ID Number	Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID Group ID GRP GPITC16		VOC	115.212(a)(3)(B)	STANDARD	1	Permit	

Dev Item No.	STEERS incident No	Deviation Period Start Date	Start Time	End Date	End Time	No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Aug 25, 2008	1310	Aug 25, 2008	1315		Overloaded truck due to operator gauging and calculation error. Methanol - 2 gallons into containment	stop activity, off-load excess, cleanup, re-train operator.
		Sep 7, 2008	1915	Sep 7, 2008	1919		Overloaded truck due to operator gauging and calculation error. Methanol - 1 gallon into containment	stop activity, off-load excess, cleanup, re-train operator.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence from supporting this deviation report?	☐ Yes ☒ No

TCEQ-10101 [06/08]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/ RN 100210806 /RP

Image Field

Permit Holder Name	Intercontinental Terminals Company LLC	Customer Number	CN 603186498
Area Name	Deer Park Terminal	Account Number (XX-XXXX-XX)	HG-0403-N

Report Period Start Date	Mar 8, 2008	Report Period End Date	Sep 7, 2008	Operating Permit Number	0 1061	Report Submittal Date	10/1/2008

Operating Permit Requirement for Which Deviations are Being Reported

ID Number	Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID / Group ID GRP		HRVOC	115.112(a)(1)	STANDARD	1	Permit	

Dev Item No.	STEERS incident No	Deviation Period Start Date	Start Time	End Date	End Time	No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	112356	Aug 10, 2008	1352	Aug 10, 2008	1359		power outage created excessive pressure within Tank 50-2, causing release from PSV-E 1,3-Butadiene - 6745 lbs	re-establish power, restart refrigeration system, decrease pressure in tank.
		Sep 5, 2008	1100	Sep 5, 2008	1130		contractor cut into wrong line, damaging product line. Benzene - 84 gallons into containment	decommission line, repair damage. Clean up.
						Total Deviations:	Is there a Part 2 Miscellaneous Monitoring/Credible Evidence from supporting this deviation report?	☐ Yes ☒ No

TCEQ-10101 [06/08]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.