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

October 1, 2010

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 7007 3020 0000 9491 9353
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 3/08/10 through 9/07/10. Please advise if any additional information is needed.

Sincerely,

Carl E. Holley
Vice President, SHES and
Regulatory Compliance

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

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.: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 3/8/2010 to 9/7/2010
*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 E Holley Signature Date: 093010

Title: VP of SHES & Regulatory Compliance

Texas Operating Permit Deviation Report Form

Permit Holder Name	Intercontinental Terminals Company, LLC					Customer Number	CN603186495
Area Name	ITC Deer Park Terminal					Account Number	HG-0403-N
Report Period Start Date	March 8, 2010	Report Period End Date	September 7, 2010	Operating Permit Number	1061	Report Submittal Date	October 1, 2010

Air CO/	RN100210806

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

ID Number		Term & Condition No. / Permit Provision No. (Rq'd if Applicable)	Pollutant	Unauthorized emissions release to atmosphere in lbs	Reportable?	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Requirements		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			
TRK-A1	n/a	NSR Permit 1078 SC 1J	lube Oil	<1 lb	no	30 TAC 116.115(c)	standard	2	permit	n/a		3/9/2010	1215	3/9/2010	1230	1	failure to properly secure loading arm valve after loading railcar	washed down loading area, retrained operator.
BGDK-9	n/a	NSR Permit 1078 SC 1J	methanol	<1 lb	no	30 TAC 116.115(c)	standard	4	permit	n/a		3/13/2010	2245	3/13/2010	2315	1	slow drip from pin hole in dock hose	shutdown movement, replace dockhose, wash down containment area.
BGDK-5	n/a	NSR Permit 1078 SC 1J	1,3-butadiene	37 lbs	STEERS# 137106	30 TAC 116.115(c)	standard	1	permit	n/a		3/16/2010	1315	3/16/2010	1320	1	failure to properly secure bull plug on loading valve after decommisioning barge.	secure valve with bull plug, retrain operator.
BGDK-2	n/a	NSR Permit 1078 SC 1J	phenol	1 lb	no	30 TAC 116.115(c)	standard	4	permit	n/a		3/19/2010	1300	3/19/2010	1315	1	dripping hose connection on ship during product movement.	retightened bolts connecting hose to ship, stopping leak. Absorbent pads used to clean up small spill.
TK105-1	n/a	NSR Permit 1078 SC 1J	crude isoprene	35 lbs	no	30 TAC 116.115(c)	standard	1	permit	n/a		3/24/2010	800	3/24/2010	830	1	leaking pressure relief valve on tank due to mechanical malfunction.	shut manual valve to disable pressure relief valve and repaired.
TK 100-9	n/a	NSR Permit 1078 SC 1J	benzene	3 lbs	no	30 TAC 116.115(c)	standard	3	permit	n/a		4/23/2010	0740	4/23/2010	0800	1	leaking cargo pump during marine to tank transfer.	shutdown movement, repair pump seal, washdown area.
n/a	n/a	NSR Permit 1078 SC 5	acetone	5 lbs	no	30 TAC 116.115(c)	standard	n/a	permit	n/a		4/25/2010	1600	4/25/2010	1650	1	small leak at a 1" valve on the #46 line.	installed a bull plug on valve to stop the leak
TRK-G1	n/a	NSR Permit 1078 SC 1J	toluene	60 lb	no	30 TAC 115.212 (a) (3) (B)	standard	1	permit	n/a		4/29/2010	1200	4/29/2010	1230	1	overloaded railcar due to improper operation of loading meter.	stop product transfer,washdown area.
SHPDK-1	n/a	NSR Permit 1078 SC 1J	phenol	< 1 lb	no	30 TAC 116.115(c)	standard	1	permit	n/a		5/5//2010	1400	5/5/2010	1420	1	visible leak on pressure gauge at line # 155	tightened down pressure gauge, washed down area.
BGDK-2	n/a	NSR Permit 1078 SC 1J	Yubase Oil	1 lb	no	30 TAC 116.115(c)	standard	1	permit	n/a		5/6/2010	0600	5/6/2010	0630	1	pin hole leak in dock hose	shutdown movement, replace dockhose, wash down containment area.
n/a	n/a	NSR Permit 1078 SC 5	benzene	45 lbs	STEERS #139472	30 TAC 116.115(c)	standard	n/a	permit	n/a		5/9/2010	1130	5/9/2010	1200	1	pin hole leak caused by localized exterior corrosion to underground product line	shutdown movement, excavate and remove damaged section of line, replace with new line.
FL-35-12	n/a	NSR Permit 1078 SC 5	butene-1	2416 lbs	STEERS # 139592	30 TAC 115.722 (c) (1)	standard	14	permit	n/a		5/11/2010	1230	5/11/2010	1232	1	Excessive nitrogen % in customer railcar while loading into tank 35-12 caused overpressure of tank and release to the atmosphere.	check all railcars for nitrogen % prior to unloading into vessel. Flare nitrogen in vapor space of railcar prior to offloading into 35-12 as necessary.
FL-35-12	n/a	NSR Permit 1078 SC 5	butene-1	0.83 lbs /hr	no	30 TAC 116.115(c)	standard	1	permit	n/a		5/18/2010	2200	5/18/2010	2300	1	excess emissions to fl-35-12 due to flaring railcars prior to unloading into 35-12 (MAERT exceedance)	limit # of railcars to be flared daily.
TRK-G1	n/a	NSR Permit 1078 SC 1J	toluene	25 lbs	no	30 TAC 115.212 (a) (3) (B)	standard	1	permit	n/a		5/29/2010	0645	5/29/2010	0715	1	overloaded railcar due to improper stop gauge on meter.	offload excess product, washdown area, retrain operator
FL-35-12	n/a	NSR Permit 1078 SC 5	butene-1	0.21 lbs /hr	no	30 TAC 116.115(c)	standard	1	permit	n/a		6/6/2010	2200	6/6/2010	2300	1	excess emissions to fl-35-12 due to flaring railcars prior to unloading into 35-12 (MAERT exceedance)	limit # of railcars to be flared daily.
n/a	n/a	NSR Permit 1078 SC 5	1,3-butadiene	70 lbs	STEERS #137106	30 TAC 116.115(c)	standard	1	permit	n/a		7/7/2010	2300	7/7/2010	2345	1	pinhole leak caused by corrosion on the insulated #60 line	remove damaged section of #60 line and replace with new line.
SHPDK-1	n/a	NSR Permit 1078 SC 5	acetone	15 lbs	no	30 TAC 116.115(c)	standard	1	permit	n/a		7/25/2010	1845	7/25/2010	1930	1	miscalculation from ship operators resulted in product into ITC's flare line	drain product from flare line.
J-TRRACK	n/a	NSR Permit 1078 SC 5	methanol	14 lbs	no	30 TAC 115.212 (a) (3) (B)	standard	1	permit	n/a		7/28/2010	2145	7/28/2010	2215	1	operator started product transfer with bleeder valve in open position.	Immediately closed bleeder valve and washed down area. Retrained operator.
TRK-A1	n/a	NSR Permit 1078 SC 1J	butyl acrylate	190 lbs	STEERS #142964	30 TAC 115.212 (a) (3) (B)	standard	1	permit	n/a		7/31/2010	0915	7/31/2010	0950	1	improper relief and disconnect of product hose after loading a railcar	washdown area, retrain operator
TRK-A1	n/a	NSR Permit 1078 SC 1J	Hexane	3375 lbs (< RQ)	no	30 TAC 115.212 (a) (3) (B)	standard	1	permit	n/a		8/2/2010	1535	8/2/2010	1600	1	release from an unsecured rail loading line during a ship to tank transfer	washdown area, properly blind off all out-of-service lines.
TR RACK-G	n/a	NSR Permit 1078 SC 1J	methanol	25 lbs	no	30 TAC 115.212 (a) (3) (B)	standard	1	permit	n/a		8/13/2010	0600	8/13/2010	0620	1	operator entered incorrect stop on meter resulting in a overfill	washed down loading area, retrained operator.
n/a	n/a	Title V Permit 01061 SC 2 F	n/a	n/a	n/a	30 TAC 101.201 (4)(b)	standard	n/a	reporting	n/a		8/14/2010	n/a	8/14/2010	n/a	1	failure to submit final record or EE within two weeks.	Submitted final EE report 17 days after initial report.

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Unit ID	Group ID								method	Frequency		Start		End				
												Date	Time	Date	Time			
BGDK-2	n/a	NSR Permit 1078 SC 1J	toluene	2 lb	no	30 TAC 116.115(c)	standard	4	permit	n/a		8/23/2010	2100	8/23/2010	2120	1	pin hole leak in dock hose	shutdown movement, replace dockhose, wash down containment area.
SHPDK-7	n/a	NSR Permit 1078 SC 1J	toluene	1 lb	no	30 TAC 116.115(c)	standard	4	permit	n/a		8/24/2010	0100	8/23/2010	0120	1	pin hole leak in dock hose	shutdown movement, replace dockhose, wash down containment area.
TRK-G1	n/a	NSR Permit 1078 SC 5	acetone	85 lbs	no	30 TAC 116.115(c)	standard	1	permit	n/a		8/25/2010	1300	8/25/2010	1330	1	operator entered incorrect stop on meter resulting in a overfill	washed down loading area, retrained operator.
SHPDK-8	n/a	NSR Permit 1078 SC 1J	benzene	1 lb	no	30 TAC 116.115(c)	standard	1	permit	n/a		8/25/2010	1645	8/25/2010	1715	1	pin hole leak in dock hose	shutdown movement, replace dockhose, wash down containment area.