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

October 5, 2009

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 7005 3110 0003 4971 0661
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 3/08/09 through 9/07/09. 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.

AIR CO/RN 100210806 /RP

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

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	3/8/2009	Report Period End Date	9/7/2009	Operating Permit Number	O1061	Report Submittal Date	Oct 1, 2009

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							
	GPITC16		VOC	115.212(a)(3)(B)	STANDARD	1	PERMIT	

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
		3/16/2009	1345	3/16/2009	1405	1	2nd 80's manifold - Leaking Flange on pipeline. Benzene – 15 gallons (inside containment)	Stopped movement, tightened bolts on flange, washed down area.
		3/21/2009	0900	3/21/2009	0945	1	12's Tank farm - Leaking pipeline. Butyl Acrylate – 5gallons (inside containment)	Stopped movement, repaired line, washed down area.
		410/2009	1230	4/10/2009	1250	1	Outback truck loading area - Overfilled tank truck due to scale clerk miscalculation. Methanol – 10 gallons (inside containment)	Stopped movement, washed down area, offloaded excess, retrained clerk.
		5/15/2009	2135	5/15/2009	2150	1	Outback Truck Rack - Overfilled tank truck. Methanol – 10 gallons (inside containment)	Stopped movement, offloaded excess, washed down area and retrained operator.
		5/27/2009	0730	5/27/2009	0750	1	Outback truck rack – leaking sight glass while loading tank truck. – Methanol – 0.5 gals (inside containment)	Stopped movement, replaced sight glass, washed down area.
					Total Deviations:	1	Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	☐ YES ☑ NO

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Unit ID	Group ID							
	GPITC16		VOC	115.212(a)(3)(B)	STANDARD	1	PERMIT	

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
		7/5/2009	1515	7/5/2009	1555		Waterfront manifold - Leaking pipeline. Benzene – 15 gallons (inside containment)	Stopped movement, tightened bolts on flange, washed down area.
		8/142009	1445	8/14/2009	1500		100's Tank truck rack- operator began loading with bleeder valve open– Methanol - 10gallons (inside containment)	Stopped movement, closed bleeder valve, washed down area, retrained operator.
		9/2/2009	2205	9/2/2009	2225		Tank Truck Loading Rack Leaking loading arm Ethylene Glycol - 0.5 gal (inside containment)	Stopped movement, repaired loading arm, washed down area.
		9/3/2009	0730	9/3/2009	0745		New manifold-relief valve lifted while loading trucks due to blockage in flame arrestor - . Methanol – 3 lbs	Stopped movement, cleared blockage,
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	☐ YES ☑ NO

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Report Period Start Date	3/8/2009	**Report Period End Date**	9/7/2009	**Operating Permit Number**	O1061	**Report Submittal Date**	Oct 2, 2009

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							
	GPITC17		VOC	115.212(a)(b)	STANDARD	1	PERMIT	

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
		3/17/2009	1000	3/17/2009	1030		Dock 9/10 Leaking flange on pipeline Benzene – 2 gallons (inside containment)	Shutdown movement, replace gasket, washed down area.
		3/23/2009	0500	3/23/2009	0600		Dock 9/10 Valve leak Methanol – 1 gallon (inside containment)	Shutdown movement, repaired valve, washed down area.
		4/8/2009	1600	4/8/2009	1645		Dock 11/12 Leaking runaround at block and bleed. Methanol – 2 gallon (inside containment)	Decommissioned line, repaired equipment.
		8/5/2009	0900	8/5/2009	0930		Dock 1 Leaking bull plug on the #53 line Toluene – 10 gal (inside containment)	Tightened bull plug, washed down area.
		8/9/2009	0445	8/9/2009	0500		Dock 5 Spilled product while removing a blind. Toluene – 1 gal (inside containment)	Washed down area, retrain.
					Total Deviations:		**Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☑ NO

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Unit ID	Group ID							
	GPITC17		VOC	115.212(a)(b)	STANDARD	1	PERMIT	

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
		8/22/2009	1110	8/22/2009	1145		Dock 10 Leak at compressor skid. Raffinate – 0.5 gallons (inside containment)	Repaired equipment, washed down area.
		9/3/2009	1440	9/3/2009	1455		Dock 8 Pinhole leak on dock hose Benzene – 0.10 gallons (inside containment)	Stopped movement, replaced hose, washed down area.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	☐ YES ☑ NO

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Unit ID	Group ID							
	GPITC16		VOC	NSR 1078 SC 1(j)	STANDARD	1	PERMIT	

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
		3/10/2009	2355	3/10/2009	2405		Old manifold Overfilled railcar Lube oil – 73 bbls (inside containment)	Stopped movement, Clean up area, offload excess, retrain
		3/20/2009	2030	3/20/2009	2050		Tank 80-9 Leaking check valve at cargo pump No. 6 Fuel Oil – 0.25 gal (inside containment)	Stopped movement, replaced gasket, washed down area.
		3/25/2009	0030	3/25/2009	0050		Dock 8 Dock hose leak No. 6 Fuel Oil – 0.5 gallons	Stopped movement, cleaned up w/ absorbent pads, replaced hose.
		4/5/2009	0520	4/5/2009	0550		Dock 8, 126 line Leaking check valve Ethylene glycol – 10 gal (inside containment)	Stopped movement, decommissioned line, repair check valve, washed down area.
		7/16/2009	1030	7/16/2009	1050		Outback truck loading Operator began loading truck with bottom valve open. YuBase Oil – 15 gal (inside containment)	Stopped movement, closed bottom valve, washed down area, retrained operator.
					Total Deviations:		**Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☑ NO

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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							
various	n/a	NSR Permit 1078	VOC	30 TAC 115	STANDARD	1	n/a	n/a

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
		3/8/2009		8/19/2009		16	Failed to properly calibrate, measure, and record VOC concentrations during tank degassing operations.	Require all third-party degassing companies to utilize properly calibrate, State approved analyzers in accordance with EPA Method 21.
		3/8/2009		8/19/2009		16	Failed to record 1-min avg VOC to verify concentrations before degassing shutdown and venting.	With properly calibrated and approved analyzer, record five, one minute avg VOC concentration before shutdown and venting to atmosphere.
		3/8/2009		8/19/2009		16	Failed to measure and record VOC concentrations after degassing and venting to the atmosphere.	Properly calibrated FID, record five, 12-hr readings while venting to the atmosphere.
Total Deviations:							Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	☐ YES ☑ NO

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Unit ID	Group ID							
various	GRPITC07	NSR Permit 1078	VOC	SC 14	STANDARD	1	n/a	n/a

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
		6/17/2009		6/22/2009		6	Odor emitting from heated fuel oil tanks 160-1 thru 3 caused odor complaints from nearby facilities. Harris County PHES inspected the area and odor abatement was requested but a nuisance violation was not issued.	Side vents on tanks 160-1 thru 3 were closed to reduce odor. No complaints since the completion of corrective action.
					Total Deviations:		**Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☑ NO