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

April 6, 2010

Executive Director
c/o Mr. Manual Bautista, Air Section Manager
TCEQ, Region 12
5425 Polk Ave., Suite H
Houston, Texas 77023

Certified Mail 7007 3020 0000 9491 9193
Return Receipt Requested

RE: Title V Annual Permit Compliance Certification Report
Intercontinental Terminals Company, Operating Permit No. O-01061
Account No. HG-0403-N

Dear Mr. Bautista:

Pursuant to 30 TAC 122.145, enclosed is the Title V Annual Permit Compliance Certification Report from 3/8/09 through 3/7/10. Please advise if you need additional information.

Sincerely,

Carl E. Holley
Vice President, SHE and
Regulatory Compliance

Enclosures

c: Administrator, EPA Region 6

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
D. Permit No.: 01061	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, 2009 to March 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: _____ Signature Date: 4/6/2010

Title: VP of SHE & Regulatory Compliance

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

AIR CO/ 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	Apr 6, 2010
Certification Period Start Date	March 8, 2009	End Date	March 7, 2010

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

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

AIR CO/ 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 6, 2010
Certification Period Start Date	March 8, 2009	End Date	March 7, 2010

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?
Jan 14, 2010	Title V, 30 TAC 122.145 Revised Semi-Annual Deviation Report	Exec Director c/o Linda Vasse	☒ Yes ☐ No
Oct 1, 2010	Title V, 30 TAC 122.145 Semi-Annual Deviation Report	Exec Director c/o Linda Vasse	☒ Yes ☐ No
			☐ Yes ☐ No
			☐ Yes ☐ No
			☐ Yes ☐ No
			☐ Yes ☐ No

Texas Operating Permit Deviation Report Form

tal Terminals Company, LLC		Customer Number	CN603186495
rk Terminal		Account Number	HG-0403-N
Report Period End Date: March 7, 2010	Operating Permit Number: 1061	Report Submittal Date	April 6, 2010

Air CO/	RN100210806

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

Pollutant	liquid spill reported in gal / 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
						method	Frequency		Start		End				
									Date	Time	Date	Time			
butene-1 (VOC)	11 lbs	N	115.212(a)(3)(B)	standard	3	permit	n/a	26	9/8/2009	1130	9/8/2009	1135	1	improper relief of loading arm after rail car loading. Build up of pressure cracked the sight glass, releasing LPG.	Replaced sight glass, retrained operator
benzene (VOC)	1 gal / 7 lbs	N	30 TAC 116.110 (a)	standard	3	permit	n/a	27	9/15/2009	600	9/15/2009	1425	1	pin hole hose leak on initial hose and subsequent two replacement hoses during tank to tank transfer.	hoses were pressure tested prior to startup. After observing leak, transfers were immediately shut down. Hoses replaced. Washed down area.
benzene (VOC)	1 gal / 7 lbs	N	40 CFR 61.302	standard	3	permit	n/a	28	9/16/2009	100	9/16/2009	120	1	two (2) leaking dock hoses during transfer	hoses were pressure tested prior to startup. After observing leak, transfers were immediately shut down. Hoses replaced. Washed down area.
Toluene (VOC)	1239 gallons/ 1452 lbs	Y, STEERS # 129623	115.212(a)(3)(B)	standard	1	permit	n/a	29	9/19/2009	100	9/19/2009	800	1	railcar overload caused by operator error.	shutdown movement immediately upon witnessing overload. Vacuum truck, absorbent pads, booms deployed to collect and dispose of material. Incident investigation conducted. Terminate operator.
Fuel Oil No. 6	1 gal / < 1 lb	N	n/a	standard	9	permit	n/a	30	9/30/2009	2230	9/30/2009	2245	1	improper hookup while connecting dock hose to barge. Product leaked into drip pan.	stopped movement, connected hose properly. cleaned up area, retrained operator.
cutter stock	0.5 gal / < 1 lb	N	n/a	standard	2	permit	n/a	31	10/7/2009	915	10/7/2009	945	1	leak at compression tube fitting on meter bypass valve on 56 line.	re-tightened compression fitting, cleaned up product.
Methanol (VOC)	1 gal / 3 lbs	N	115.212(a)(3)(B)	standard	1	permit	n/a	32	10/25/2009	1700	10/25/2009	1715	1	overfilled tank truck due to operator mis-calculation	removed excess product from truck, washed down trailer and containment, retrained operator.
YuBase Oil	2 gals / < 1 lb	N	30 TAC 116.110 (a)	standard	n/a	permit	n/a	33	10/28/2009	1150	10/28/2009	1250	1	leaking flange on line to tk 12-17 due to improper relief	relieved pressure from line, replaced leaking flange.
cutter stock	1 gal / < 1 lb	N	30 TAC 116.110 (a)	standard	n/a	permit	n/a	34	11/7/2009	905	11/7/2009	1000	1	leaking valve on line to tk 12-47.	re-tightened valve packing, cleaned up area.
butene-1 (VOC)	11 lbs	N	115.212(a)(3)(B)	standard	3	permit	n/a	35	11/7/2009	2245	11/7/2009	2255	1	Improper relief of loading arm after rail car loading. Build up of pressure cracked the sight glass, releasing LPG.	Replaced sight glass, retrained operator
Pyrolysis Gasoline (VOC)	4 gal / 1 lb	N	40 CFR 61.302	standard	n/a	permit	n/a	36	11/17/2009	1500	11/17/2009	1515	1	leaking hose during tank to tank transfer at 3rd 80's manifold	hoses were pressure tested prior to startup. After observing leak, transfers were immediately shut down. Hoses replaced. Washed down area.
butene-1 (VOC)	1 lb	N	115.212(a)(3)(B)	standard	3	permit	n/a	37	11/22/2009	9000	11/22/2009	915	1	pin hole leak discovered in the loading line.	decommissioned line, repaired line leak.
YuBase Oil	4 gal / 1 lb	N	30 TAC 116.110 (a)	standard	1	permit	n/a	38	12/5/2009	1615	12/5/2009	1640	1	leaking flange at tk 12-27 due to improper relief	relieve pressure from line, replace gasket, wash down area, retrain operator.
methanol (voc)	0.5 gals / 1 lb	N	115.212(a)(3)(B)	standard	1	permit	n/a	39	12/12/2009	845	12/12/2009	900	1	leaking loading arm	repaired loading arm, washed down area.
Toluene (VOC)	2 gals / 7 lb	N	115.212(a)(3)(B)	standard	1	permit	n/a	40	12/12/2009	900	12/12/2009	920	1	leaking hose on a rail car loading line.	stopped movement, replaced hose, washed down area.
YuBase Oil	0.5 gals / < 1 lb	N	n/a	standard	2	permit	n/a	41	12/12/2009	910	12/12/2009	930	1	leaking loading arm.	repaired loading arm, washed down area.

Texas Operating Permit Deviation Report Form

tal Terminals Company, LLC				Customer Number	CN603186495
k Terminal				Account Number	HG-0403-N
Report Period End Date	March 7, 2010	Operating Permit Number	1061	Report Submittal Date	April 6, 2010

Air CO/	RN100210806

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						method	Frequency		Start		End				
									Date	Time	Date	Time			
YuBase Oil	8 gal / < 1 lb	N	n/a	standard	2	permit	n/a	42	12/14/2009	1730	12/14/2009	1750	1	spill during truck load from improper connection	stop movement, clean up area, retrain operator.
Lube Oil	10 bbls / 15 lbs	N	30 TAC 116.110 (a)	standard	2	permit	n/a	43	12/21/2009	1130	12/21/2009	1400	1	During a transfer from 12-43 to Valvoline, a one-inch bleed valve assemble broke at the nipple on the discharge side of the pump.	immediately shutdown movement, replaced bleeder valve, recovered product from containment area.
Fuel Oil No. 6	5 gals / < 1 lb	N	30 TAC 116.110 (a)	standard	1	permit	n/a	44	12/28/2009	1500	12/28/2009	1530	1	leaking flange at tk 160-3 heat exchanger. Blockage at run around created excessive pressure in exchanger.	shut down exchanger, relieved pressure, replaced gasket, washed down area.
Methanol (VOC)	50 gals / 49 lbs	N	115.212(a)(3)(B)	standard	1	permit	n/a	45	1/14/2010	1430	1/14/2010	1450	1	overloaded railcar due to operator miscalculation and leaking valve .	washed down area into chem drains, Operator re-trained, valve replaced.
2-EHA	10 gal / 1 lb	N	115.212(a)(3)(B)	standard	1	permit	n/a	46	1/18/2010	940	1/18/2010	955	1	overloaded tank truck. meter malfunction.	washed down area. Inspected meter, interviewed operator.
ethanol	15 gal /	N	115.212(a)(3)(B)	standard	1	permit	n/a	47	1/25/2010	815	1/25/2010	840	1	Shortly after starting a marine to tank transfer, a leak developed on a pipeline flange near the tank.	Movement was immediately shut down, replaced gasket, cleaned up area.
No. 6 Fuel Oil	5 gal / < 1 lb	N	115.212(a)(3)(B)	standard	2	permit	n/a	48	1/27/2010	1415	1/27/2010	1435	1	After a truck to tank movement, operator failed to shut discharge valve before disconecting hose resulting in a small discharge into the loading area.	closed discharge valve, washed down area, re-trained operator
Crude Butadiene	7 lbs	N	30 TAC 116.110 (a)	standard	1	permit	n/a	49	3/2/2010	945	3/2/2010	1030	1	Leak at one-inch bleeder valve on pipeline #40 from dock to TK 105-3 resulting in the formation of a small ice ball.	Line was removed from service, bleeder valve replaced.