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

March 18, 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 7003 1010 0002 1039 8621
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 Ms. Vasse:

Pursuant to 30 TAC 122.145, enclosed is the Title V Annual Permit Compliance Certification Report from 3/8/08 through 3/7/09. 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.

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, 2008 to March 7, 2009
*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: 3/18/2009

Title: VP of SHE & Regulatory Compliance

TCEQ

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	Mar 18, 2009
Certification Period Start Date	Mar 8, 2008	End Date	Mar 7, 2009

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	O 1061	Report Submittal Date	Mar 18, 2009
Certification Period Start Date	Mar 8, 2008	End Date	Mar 7, 2009

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 1, 2008	Title V, 30 TAC 122.145 Semi-Annual Deviation Report	Linda Vasse, Air Section Mgr., TCEQ	☒ 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	Mar 18, 2009
Certification Period Start Date	Mar 8, 2008	End Date	Mar 7, 2009

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

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	9/8/2008	Report Period End Date	3/7/2009	Operating Permit Number	O1061	Report Submittal Date	Mar 18, 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			
		9/9/2008	1105	9/9/2008	1110		Leaking dry brake on truck trailer during loading at Truck Rack J. Methanol – 5 gallons (inside containment)	Stopped movement, offloaded trailer, washed down area.
		9/24/2008	1140	9/24/2008	1155		Leak at 30-8 tank manifold during pipeline thermal relief at run-around. Phenol – 4 gallons (inside containment)	Stopped movement, repaired equipment, washed down area.
		9/30/2008	0845	9/30/2008	0855		Leak on valve fitting during rail car loading at Track J. Methanol – 2 gallons (inside containment)	Stopped movement, repaired fitting, washed down area.
		10/2/2008	1600	10/2/2008	1605		Overloaded truck due to improper scale data entry at Track J. Methanol – 5 gallons (inside containment)	Stopped movement, offloaded excess, washed down area and retrained operator.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	☐ YES ☒ NO

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	9/8/2008	Report Period End Date	3/7/2009	Operating Permit Number	O1061	Report Submittal Date	Mar 18, 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			
		10/8/2008	1630	10/8/2008	1645		Leaking valve at Tank 105-2 cargo pump. Propylene – 15 lbs	Stopped movement, repaired valve.
		10/9/2008	0720	10/9/2008	0730		Overloaded truck due to improper scale data entry at Outback Truck Rack. Methanol – 3 gallons (inside containment)	Stopped movement, offloaded excess, washed down area and retrained operator.
		10/10/2008	0140	10/10/2008	0150		Leak on loading arm during rail car loading at Track A. Methanol – 2 gallons (inside containment)	Stopped movement, repaired loading arm, washed down area.
		10/10/2008	1230	10/10/2008	1240		Leak on rail car valve during loading at Track J. Phenol– 0.5 gallons (inside containment)	Stopped movement, offloaded leaking trailer, cleaned up area.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	☐ YES ☑ NO

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	9/8/2008	Report Period End Date	3/7/2009	Operating Permit Number	O1061	Report Submittal Date	Mar 18, 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			
		10/15/2009	1300	10/15/2009	1310		Overloaded truck due to wrong data input into scale meter. MTBE – 5 gallons (inside containment)	Remove excess product from truck, cleanup area, retrain operator.
		10/23/2008	1300	10/23/2008	1315		Railcar valve leak at rail rack J Phenol - < 0.5 gallon (inside containment)	Offloaded railcar, repaired valve, washed down area.
		10/25/2008	1230	10/25/2008	1235		Overloaded truck due to meter malfunction Methanol – 2 gallons (inside containment)	Stopped movement, offloaded excess product, cleaned up area, repaired meter
		10/30/2008	0930	10/30/2008	0940		Leaking ½ in. valve fitting during rail car loading at Track J. Methanol – 0.5 gallons (inside containment)	Stopped movement, repaired valve, washed down area.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	☐ YES ☑ NO

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	9/8/2008	Report Period End Date	3/7/2009	Operating Permit Number	O1061	Report Submittal Date	Mar 18, 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			
		10/30/2008	0900	10/30/2008	0910		Overloaded railcar at Outback Rack due to calculation error. Methanol – 15 gallons (inside containment)	Remove excess product from rail car, cleanup area, retrain operator.
		11/12/2008	1340	11/12/2008	1355		Small leak on pipeline due to corrosion. Ethylene Glycol – 44 gallons (inside containment)	Emptied pipeline, washed down area, repaired line.
		11/21/2008	1315	11/21/2008	1335		Damaged ½ in line on recirculation system inside tank 31-1 manifold. Raffinate – 500 lbs (inside containment)	Stopped movement, offloaded excess product, cleaned up area, repaired meter
		11/23/2008	1410	11/23/2008	1425		Tank truck belly cap leak while loading at Truck Rack J. Methanol - 0.5 gallons (inside containment)	Stopped movement, repaired valve, washed down area.
		11/28/2008	1700	11/28/2008	1725		Tank truck internal valve leak at Old Manifold . Methanol – 0.5 gallons (inside containment)	Stopped movement, repaired valve, washed down area.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	☐ YES ☑ NO

TCEQ

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	9/8/2008	**Report Period End Date**	3/7/2009	**Operating Permit Number**	**O1061**	**Report Submittal Date**	Mar 18, 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			
		11/29/2008	1405	11/29/2008	1430		Tank truck leak from trailer shell while loading at truck rack J. Methanol - 0.5 gallons (inside containment)	Remove product from trailer, cleanup area.
		12/2/2008	0940	12/2/2008	0958		Damaged fitting on recirculation line. Raffinate – 50 lbs (inside containment)	Decommissioned line, washed down area, and repaired line.
		12/5//2008	1325	12/5/2008	1335		Overloaded tank truck due to gauging error at S. Scale Outback. Methanol – 20 gallons (inside containment)	Stopped movement, offloaded excess product, cleaned up area, repaired meter
		12/9/2008	1115	12/9/2008	1145		Pump seal leak on the recirculation system at Tank 12-25. Isoprene - 9 gallons (inside containment)	Decommissioned line, washed down area, and repaired line.
		12/17/2008	0805	12/17/2008	0815		Wrong valve opened during truck loading, causing product to escape through bleeder. Methanol – 4 gallons (inside containment)	closed valve, washed down area, re-train operator.
					Total Deviations:		**Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☑ NO

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	9/8/2008	**Report Period End Date**	3/7/2009	**Operating Permit Number**	**O1061**	**Report Submittal Date**	Mar 18, 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			
		12/20/2008	0515	12/20/2008	0525		Leaking Loading arm at Outback truck Rack Toluene - 0.5 gallons (inside containment)	Stopped movement, repaired arm, cleanup area.
		12/31/2008	0645	12/31/2008	0655		Damaged fitting on recirculation line. Raffinate – 50 lbs (inside containment)	Decommissioned line, washed down area, and repaired line.
		1/7/2009	0910	1/7/2009	0920		Leaking Loading arm at Truck Rack J Phenol - 0.5 gallons (inside containment)	Stopped movement, repaired arm, cleanup area.
		1/25/2009	0840	1/25/2009	0845		Leak from improperly secured hose cap. D-MMA - 5 gallons (inside containment)	Stopped movement, replaced cap, washed down area.
		1/30/2009	1200	1/30/2009	1220		Overloaded tank truck at Truck Rack J due to meter error. Methanol – 5 gallons (inside containment)	Remove excess product, washed down area, re-train operator.
					Total Deviations:		**Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☑ NO

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	9/8/2008	Report Period End Date	3/7/2009	Operating Permit Number	O1061	Report Submittal Date	Mar 18, 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			
		2/2/09	0940	2/2/09	0945		Leaking Loading hose at Outback truck Rack Methanol - 0.5 gallons (inside containment)	Stopped movement, replaced hose, cleanup area.
		2/19/09	1450	2/19/09	1510		Leak at Valve Packing 36's Manifold D-MMA - 0.5 gallons (inside containment)	Shutdown movement, tightened packing bolts, wash down area.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	☐ YES ☑ NO

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	9/8/2008	**Report Period End Date**	3/7/2009	**Operating Permit Number**	**O1061**	**Report Submittal Date**	Mar 18, 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			
		9/16/2008	2230	9/16/2008	2240		Leaking pipeline at Dock No. 1 due to thermal expansion. Phenol - 15 gallons (inside containment)	Stopped movement, repaired line, washed down area.
	114932	10/2/2008	1600	10/2/2008	1635		Leak into barge drip pan during hook up from dock no. 9 to ship. Benzene – 15 lbs to atmosphere	Shutdown movement, Transfer benzene to closed container.
		10/30/2008	1345	10/30/2008	1415		Line #160 at dock no. 7 was improperly relieved causing gasket failure. Alkylate - 20 gallons (inside containment)	Shutdown movement, repaired line, washed down area, retrained operator.
		10/31/2008	2125	10/31/2008	2135		Leak on hose flange at Dock no. 5 during pressure test. Ethylene Dichloride – 0.5 gallons (inside containment)	Stopped test, repaired gasket, washed down area.
		11/20/2008	1930	11/20/2008	1940		Pinhole leak in dock hose at dock no. 5. Alkylate - 0.5 gallons (inside containment)	Stopped movement, replaced line, washed down area.
					Total Deviations:		**Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☑ NO

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	9/8/2008	**Report Period End Date**	3/7/2009	**Operating Permit Number**	**O1061**	**Report Submittal Date**	Mar 18, 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			
		12/15/2008	1515	12/15/2008	1530		Pinhole leak in dock hose at dock no. 7. benzene - 0.5 gallons (inside containment)	Stopped movement, replaced hose, washed down area.
		12/24/2008	2315	12/24/2008	2340		Pinhole leak in dock hose at dock no. 8. benzene - 2 gallons (inside containment)	Shutdown movement, replaced hose, washed down area.
		1/1/2009	0745	1/1/2009	0759		Spill during dock hose connection with barge at Dock no. 4. Butanol -1 gallon (inside containment)	Shutdown movement, washed down area and retrained operator.
		1/2/2009	2330	1/2/2009	2340		Product leaking from dock hose blind at Dock no. 7. benzene – 0.5 gallons (inside containment)	Removed residual product from hose, tighten blind, washed down area.
		1/4/2009	0800	1/4/2009	0815		Pinhole leak in dock hose at dock no. 9. benzene – 0.5 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

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	9/8/2008	Report Period End Date	3/7/2009	Operating Permit Number	O1061	Report Submittal Date	Mar 18, 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			
		1/15/2009	1500	1/15/2009	1515		Pinhole leak in dock hose at dock no. 9. ethanol - 3 gallons (inside containment)	Stopped movement, replaced hose, washed down area.
		2/10/2009	1205	2/10/2009	1220		Pinhole leak in steam line at dock no. 1. Phenol – 0.5 gallons (inside containment)	Shutdown movement, washed down area, repaired steam line.
					Total Deviations:		Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	☐ YES ☑ NO

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	9/8/2008	**Report Period End Date**	3/7/2009	**Operating Permit Number**	**O1061**	**Report Submittal Date**	Mar 18, 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	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			
		10/8/2008	1630	10/8/2008	1645		Pump seal leak at Tank 12-43 manifold. Lube Oil- 7 gallons (inside containment)	Shutdown movement, replace seal, wash down area.
	GLO # 20083840	10/20/2008	1840	10/20/2008	1855		Leaking hose at blind flange on Bunker Dock. Fuel Oil No. 6 - 0.5 gallons	Tighten bolts, clean up, retrain operators.
		11/23/2008	2015	11/23/2008	2040		Dock No. 2 flange leak on the bunker line. Fuel Oil No. 6 – 5 gallons (inside containment)	Shutdown movement, replace gasket, wash down area.
		12/13/2008	1400	12/13/2008	1415		Leaking gasket inside Tank 80-11 manifold Basestock Oil – 2 gallons (inside containment)	Shutdown movement, replace gasket, wash down area.
		12/22/2008	0940	12/22/2008	0950		Pump seal leak at Dock No. 5. Lube Oil- 1 gallon (inside containment)	Shutdown movement, replace seal, wash down area.
					Total Deviations:		**Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☑ NO

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	9/8/2008	Report Period End Date	3/7/2009	Operating Permit Number	O1061	Report Submittal Date	Mar 18, 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	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			
		10/29/2008	0400	0410	0415		Leaking block and bleed valve at tank 25-5 and 25-6. Acrylic Acid – 2 gallons (inside containment)	Stopped movement, repaired valve, washed down area.
		1/29/2009	0700	1/29/2009	0720		Pump seal leak at 80's manifold. Fuel Oil No. 2 - 5 gallons (inside containment)	Shutdown movement, replace seal, wash down area.
		2/7/2009	1400	2/7/2009	1430		Ruptured Hose inside Tank 35-10 manifold. Star 6 Oil – 33 barrels (inside containment)	Shutdown movement, replace hose, wash down area.
		2/27/2009	1600	2/27/2009	1605		Improper line up at 12's truck loading rack caused product to enter the vapor line. Resin Oil – 1.5 gallons (inside containment)	Corrected line up, wash down area, retrain 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							
	GPITC16		VOC	30 TAC 115.112(a)(1)	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			
		8/28/2008	1435	11/11/2008	1005		Tank 35-5 product level dropped below low gauge, thus landing IFR legs. Isoprene – 2311 lbs total or 30.8 lbs / day to atmosphere. MAERT or RQ not exceeded	Inbound sufficient quantity to float IFR.
		11/23/2008	2250	3/07/2009	2305		Tank 12-11 filled beyond high gauge, resulting in a damaged IFR. Hexene-1 – 1248 lbs total or 12 lbs / day to atmosphere. MAERT or RQ not exceeded	Strip tank of all product, degas, inspect and repair.
					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							
	GPITC16		VOC	NSR Permit #1078 Special Condition 1.D.	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			
		1/1/2009		1/1/2009			Ten year IFR Inspection was not completed before due date (12/31/2008) due to lack of alternative storage location.	Strip tank of all product, clean, inspect and repair if necessary. Letter written to TCEQ in December 2008 requesting an extension to the 12/31/2008 due date.
Total Deviations:							**Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☑ NO

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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							
HRVOC Thermal Oxidizer 1 & 2			VOC	Standard Permit No. 76266	STANDARD	1	CMS	CMS

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			
		9/8/2008		12/31/2008			Thermal Oxidizer 1 & 2 Continuous Monitoring System recording raw data properly but is calculating data incorrectly resulting in over reporting of emission totals.	Calculations, destruction efficiencies, and raw data being reviewed and re-calculated in order to provide accurate HRVOC totals for 2008.
Total Deviations:							**Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☑ NO