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

March 28, 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 7002 2030 0000 3790 7442
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 Title V annual permit compliance certification report from 3/8/07 through 3/7/08. 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.:	
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 _____ to _____
*Start Date** *End Date**

OR

B. Specific Dates: March 8, 2007 thru March 7, 2008
*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: 032708

Title: VP SHE & Regulatory

Texas Natural Resource Conservation Commission
Texas Federal Operating Permit Form
PCC
Permit Compliance Certification
(Part 1)

Company Name	Intercontinental Terminals Company LLC			**Account No.**	HG-0403-N
Area Name	ITC Deer Park Terminal			**Op Permit No.**	0-1061
Certification Period Began on	3/08/07	**And Ended on**	3/07/08	**Report Submittal Date**	03/28/2008

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**	
		Yes	**No**
	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 company in continuous compliance with all the terms and conditions of the permit over the Certification Period?	X	

II.	**Summary of Deviations** **(Indicate response by placing a 'x' in the appropriate column for each of the following questions)**	**Response**	
		Yes	**No**
A.	Were there any deviations from any terms or conditions of the permit during the Certification Period that have *previously* been reported to the agency? If the answer to this question is 'Yes', please complete Part 2, and attach Part 2 to this page. *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 Part 3 to provide that information.	X	
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 question is 'Yes', please include the relevant reports along with this page.	X	

NOTE: The Responsible Official must certify the information reported in conjunction with this form in accordance with 30 TAC 122.143(16) utilizing form OP-CRO1 (Certification by Responsible Official). Therefore, complete an OP-CRO1 and attach it to this Compliance Certification package and submit the package to the appropriate TNRCC Regional Office.

Texas Natural Resource Conservation Commission
Texas Federal Operating Permit Form
PCC
Permit Compliance Certification
(Part 2)

Company Name	Intercontinental Terminals Company LLC			**Account No.**	HG-0403-N
Area Name	ITC Deer Park Terminal			**Op Permit No.**	0-01061
Certification Period Began on	03/08/07	**And Ended on**	03/07/08	**Report Submittal Date**	3/28/2008

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? (Y/N)
	See deviation report to TCEQ for period 03/08/07 thru 09/07/2007		

Reporting Period:

9/08/2007 thru 03/07/2008

Texas Operating Permit Deviation Report Form

Company Name	INTERCONTINENTAL TERMINALS COMPANY			Account No.	HG-0403-N
Area Name	DEER PARK TERMINAL			Operating Permit No.	O-01061
Report Period Began on	09/08/07	And Ended on	03/07/08	Report Submittal Date	03/28/08

Operating Permit Requirement for Which Deviations are Being Reported

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
	GPITC16		VOC	115.212(a)(3)(B)	STANDARD	1		

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

Event No. (Optional)	Deviation Period				# Of Devs	Cause of Devation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
	9-11-2007	2215	9-11-2007	2220	1	Flange gasket failure	Stop transfer. Contain product, replace gasket. Toluene / 10 gal liquid.
	9-20-2007	0915	9-20-2007	0918	1	Overloaded rail car due to meter malfunction.	Stop transfer, contain product, remove excess product, replace meter. Aviation gasoline / 20 gallons liquid
	9/21/2007	1400	9-21-2007	1405	1	Leak from hose fitting on railcar loading rack	Stop transfer, contain product, remove excess product, replace hose. GMMA / 2 gallons liquid
	9/24/2007	0515	9-24-2007	0520	1	Overloaded railcar due to missed stop	Stop transfer, contain product, remove excess product, methanol 20 gallons liquid
	10-10-2007	0930	10-10-2007	0940	1	Failed pressure gauge on TK 12-20 pump discharge.	Stop transfer, contain product, remove excess product, replace pressure gauge. Butyl Acrylate / 42 gallons liquid
	10-12-2007	1430	10-12-2007	1435	1	Spillage from 30-4 loading arm valve left open after previous movement.	Close valve, clean up, train operator YUBase 6 / 10 gal liquid
Total Deviations:							

Texas Operating Permit Deviation Report Form

Company Name	INTERCONTINENTAL TERMINALS COMPANY			Account No.	HG-0403-N
Area Name	DEER PARK TERMINAL			Operating Permit No.	O-01061
Report Period Began on	09/08/07	And Ended on	03/07/08	Report Submittal Date	03/28/08

Operating Permit Requirement for Which Deviations are Being Reported

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
	GPITC16		VOC	115.212(a)(3)(B)	STANDARD	1		

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

Event No. (Optional)	Deviation Period				# Of Devs	Cause of Devation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
	10-13-2007	1630	10-13-2007	1635	1	Overflowed compartment of railcar due to missed stop	Stop transfer, contain product, remove excess product, re-train. YUBase 6 / 15 gallons liquid
	10-15-2007	1930	10-15-2007	1935	1	Pipeline gasket leak	Stop transfer, empty line, replace gasket. Lubrizol Oil / 5 gal liquid
	10-17-2007	2345	10-17-2007	2350	1	Leaking loading arm hose at Outback railcar rack	Stop transfer, contain product, replace hose. Acetone / 5 gal liquid
	10-18-2007	1735	10-18-2007	1740	1	Leak at TK 50-3 runaround line	Blocked-in runaround line and repaired. Crude Acrylic Acid / 210 gal liquid
	10-25-2007	1650	10-25-2007	1654	1	Leak at track #781B pump during railcar loading.	Shutdown movement, tightened bolts on pump housing. Phenol / 0.5 gal liquid
	12-4-2007	0740	12-4-2007	0800	1	Leak on valve packing of liquid line at tank car rack	Tighten bolts on valve / propylene 10 lbs.
Total Deviations:							

Texas Operating Permit Deviation Report Form

Company Name	INTERCONTINENTAL TERMINALS COMPANY			Account No.	HG-0403-N
Area Name	DEER PARK TERMINAL			Operating Permit No.	O-01061
Report Period Began on	09/08/07	And Ended on	03/07/08	Report Submittal Date	03/28/08

Operating Permit Requirement for Which Deviations are Being Reported

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
	GPITC16		VOC	115.212(a)(3)(B)	STANDARD	1		

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

Event No. (Optional)	Deviation Period				# Of Devs	Cause of Devation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
	1/08/2008	1650	1/08/2008	1655	1	Leak at valve bonnet on unloading pump	Stop movement, tighten bolts on valve. Phenol / < 0.5 gal liquid
	1/17/2008	1620	1/17/2008	1625	1	100's railcar loading arm leak from bleeder valve.	Stop movement, replace valve. Methanol / 1 gal liquid
	1/19/2008	1045	1/19/2008	1050	1	Leak on TK 12-12 run-around line	Stop movement, replace line. CMMA / 1.5 gal liquid
	1/25/2008	2100	1/25/2008	2115	1	Packing gland leak on railcar	Tighten bolts on packing. Propylene / 2 lbs
	1/29/2008	1122	1/29/2008	1135	1	Leaking flange on #147 line at TK80-25	Stop movement, Replace gasket. Methanol / 84 gal liquid
	2/07/2008	1045	2/07/2008	1050	1	Miscalc of gauge resulting in overloaded truck at Outback	Trailer offloaded, restrapped, area washdown, additional op training. Methanol / 2 gal liquid
Total Deviations:							

Texas Operating Permit Deviation Report Form

Company Name	INTERCONTINENTAL TERMINALS COMPANY			Account No.	HG-0403-N
Area Name	DEER PARK TERMINAL			Operating Permit No.	O-01061
Report Period Began on	09/08/07	And Ended on	03/07/08	Report Submittal Date	03/28/08

Operating Permit Requirement for Which Deviations are Being Reported

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
	GPITC16		VOC	115.212(a)(3)(B)	STANDARD	1		

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

Event No. (Optional)	Deviation Period				# Of Devs	Cause of Devation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
	2/11/2008	1150	2/11/2008	1158	1	Overloaded railcar at 80's rack due to missed stop.	Stop movement, cleanup, re-train. Solvent 100 / 42 gal liquid
	2/14/2008	1610	2/14/2008	1615	1	Over-pressurized railcar while pressing with N2, forcing product out of car.	Shutdown operation, wash down, re-train. Suresol 100 / 42 gal liquid
	2/25/2008	1335	2/25/2008	1355	1	Pump housing leak at TK 80-32	Stop movement, repair pump Benzene, 1.5 gal liquid
	2/27/2008	1235	2/27/2008	1239	1	Leak on liquid valve of railcar at 100's rack	Stop transfer, repair valve Phenol / 0.5 gal liquid
	2/27/2008	1840	2/27/2008	1844	1	Improperly secured railcar causing valve damage and product leak.	Stop leak, repair valve, re-train. Methanol / 1 gal liquid
Total Deviations:					23		

Texas Operating Permit Deviation Report Form

Company Name	INTERCONTINENTAL TERMINALS COMPANY			Account No.	HG-0403-N
Area Name	DEER PARK TERMINAL			Operating Permit No.	O-01061
Report Period Began on	09/08/07	And Ended on	03/07/08	Report Submittal Date	03/28/08

Operating Permit Requirement for Which Deviations are Being Reported

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
	GPITC17		VOC	115.212(a)(b)	STANDARD	1		

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

Event No. (Optional)	Deviation Period				# Of Devs	Cause of Devation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
	9/18/2007	0300	9/18/2007	0303	1	Spill at dock #7 during hose disconnect	Clean area, retrain. Methanol / 1 gal liquid
	11/7/2007	1010	11/7/2007	1025	1	Small leak on inboard hose at dock #7	Stopped movement, replaced hose Methanol / 1 gal liquid
	11/23/2007	1530	11/23/2007	1545	1	Small leak on inboard hose at dock #5	Stopped movement, replaced hose #6 Fuel Oil / 2.5 gal liquid
	12/2/2007	2100	12/2/2007	2120	1	Leaking flange on dock line	Re-tighten bolts on flange 1,3-Butadiene / 1 lb
	12/05/20007	1325	12/05/20007	1330	1	Leaking flange on dock line	Re-tighten bolts on flange Toluene / < 0.5 gal liquid
	12/13/2007	1515	12/13/2007	1530	1	Leak on dock hose at dock #1	Stopped movement, replaced hose DMMA / 1 gal liquid
	2/08/2008	0430	2/08/2008	0435	1	Small crack in weld of bleeder	Clear line, repair bleeder valve 1,3-butadiene / 0.5 lbs
	2/27/2008	1440	2/27/2008	1450	1	Leak at dock hose on dock #8	Stopped movement, replaced hose Toluene / 1 gal liquid
Total Deviations:					8		

Texas Operating Permit Deviation Report Form

Company Name	INTERCONTINENTAL TERMINALS COMPANY			Account No.	HG-0403-N
Area Name	DEER PARK TERMINAL			Operating Permit No.	O-01061
Report Period Began on	09/08/07	And Ended on	03/07/08	Report Submittal Date	03/28/08

Operating Permit Requirement for Which Deviations are Being Reported

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
			VOC	115.112 (a)(1)	STANDARD	1		

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

Event No. (Optional)	Deviation Period				# Of Devs	Cause of Devation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
	10/27/2007	0759	10/27/2007	0761	1	Failed panametric system of thermal oxidizer resulted in a release from TK 50-2 pressure relief valve resulting in a loss of 1759 lbs of 1,3-Butadiene to atmosphere	Root cause analysis conducted, panametric system replaced. TCEQ STEERS #99334
Total Deviations:					1		