ITC Tank Fire Transition from Emergency Response to Long-Term Remediation

Incident Overview:

On March 17, 2019, an above ground storage tank containing Naphtha, caught fire within the 2nd 80's Tank Farm at the Intercontinental Terminals Company (ITC), LLC facility in Deer Park Texas. The affected ITC tank farm consisted of fifteen 80,000-barrel capacity above ground storage tanks containing petroleum products including: naphtha, xylene, toluene, pyrolosis gas (pygas), gasoline blendstock, and base oil. All 15 tanks in the 2nd 80's Tank Farm were impacted by the fire and ten of the tanks collapsed, or partly collapsed. Water runoff from fighting the tank farm fire and the partial failure of the secondary containment surrounding the tank farm, discharged tens of thousands of barrels of material into Tucker Bayou, which empties into the Houston Ship Channel. This also resulted in the release of contaminants into the atmosphere, and the discharge of some of the tank contents to drainage pathways that led to the Houston Ship Channel.

Response Activities and Transition:

On June 19, 2019, the U.S. Environmental Protection Agency (EPA) Federal On-Scene Coordinator (FOSC) is transitioning this incident from the emergency response phase to the long-term remediation phase, in which the Texas Commission on Environmental Quality (TCEQ) State On-Scene Coordinator (SOSC) and Remediation Division will oversee and approve the remaining cleanup efforts relative to this incident.

Community Air Monitoring/Sampling:

ITC will continue air monitoring and sampling activities in accordance with the currently approved Analytical Air Sampling Plan, dated May 9, 2019. Any reduction in the air monitoring/sampling activities will require the approval of the TCEQ SOSC and/or Remediation Division.

Tank Farm:

As of June 17, 2019, ITC has emptied and cleaned, to the extent possible, all the tanks within the 2nd 80's Tank Farm and has flushed and cleaned all piping within the tank farm system. However, because many of the tanks are severely damaged, ITC indicated that it was impossible to completely clean and remove all residual contents from the tanks without first demolishing them.

ITC is currently in the process of demolishing all 15 tanks in the 2nd 80's Tank Farm to remove any residual contents. To date, demolition of the pygas tanks (Tanks 80-15, 80-14, 80-10 and 80-7), and the toluene tank (80-13) have been completed. It is anticipated that on site volatile organic compounds (VOC) emissions and flash fires may occur during the tank demolition activities. However, that risk has been greatly reduced with the removal of the pygas tanks. The sampling and monitoring activities associated with this effort will remain in place as there are

public roadways and industrial neighbors close to the tank farm. The TCEQ SOSC and Remediation Division will continue to oversee and approve all subsequent plans associated with the ultimate clean-up actions for the tank farm.

Impacted Ditches between the Tank Farm and Tuckers Bayou:

The water runoff from fire-fighting activities during the tank farm fire and the partial failure of the secondary containment surrounding the tank farm discharged tens of thousands of barrels of material into Tucker Bayou, which empties into the Houston Ship Channel. Multiple ditches along the release pathway were impacted. ITC is currently addressing the ditches and the accumulation of residual materials along these pathways. The TCEQ SOSC and Remediation Division will continue to oversee and approve all subsequent plans associated with the ultimate clean-up along the impacted ditches associated with this event including those between the tank farm and Tucker Bayou.

Impacted Waterways:

The water runoff from fighting the tank farm fire and the failure of the secondary containment discharged tens of thousands of barrels of material into Tucker Bayou, which empties into the Houston Ship Channel. Under the oversight of the EPA, with assistance from the U.S. Coast Guard (USCG), ITC has completed the main recovery of materials in the Houston Ship Channel and is continuing to address any areas causing sheens on the impacted waterway. The Unified Command for this incident (ITC, EPA, TCEQ, and Harris County) has signed-off on the completion of emergency response cleanup activities in the Houston Ship Channel and surrounding waterways, except for Tucker Bayou. Unified Command partners agreed that the final cleanup of Tucker Bayou would be transitioned and addressed under the long-term remediation phase and not as part of the emergency response. The TCEQ SOSC and Remediation Division will oversee further cleanup efforts in Tucker Bayou.

The USCG Sector for Houston-Galveston will provide assistance as needed to the TCEQ by monitoring the waterways in the impacted area during normal patrol activities and report any findings to ITC and the TCEQ SOSC.

ITC will:

1. Continue to conduct patrol and monitoring activities within the affected area for the presence of material or sheen observance associated with this incident and take appropriate response actions to address those issues in accordance with the treatment recommendations identified in the 2nd 80's Fire Deer Park Texas SCAT Plan Version 1.0 dated April 13, 2019. ITC will work with TCEQ on the timeframe for this activity;
2. Complete weekly 214s or similar documentation noting the observations from the impacted area as well as special areas designated under the monitoring and maintenance plan. These weekly reports will be emailed to TCEQ and the USCG Sector for Houston-Galveston by Thursday of each week. The email should be directed to the TCEQ at spill12@tceq.texas.gov and to the USCG Sector for Houston-Galveston Incident Management Division at USCGIMDHouston@gmail.com; and,

3. Report any new areas of material or sheen observance to the National Response Center at (800) 424-8802 and indicate that it is associated with the ITC Fire Incident (NRC# 1240304) of March 17, 2019.

Emergency Response Phase to Long-Term Remediation Phase Sign-off:

The EPA FOSC has transitioned the ITC Tank Fire response from the emergency response phase to the long-term remediation phase. The TCEQ will provide responsible party oversight for remaining activities.

Site	ITC Tank Fire / 2nd 80's Fire
Site ID	A6SN
Site Address	1943 Independence Parkway, Deer Park / LaPorte, Texas

EPA FOSC _____ Adam Adams, FOSC
Date: _____ June 19, 2019

TCEQ SOSC KBernhagen
Date: June 19, 2019