



January 12, 2021

Bridget C. Bohac, Chief Clerk
Texas Commission on Environmental Quality
Office of the Chief Clerk, MC 105
P.O. Box 13087
Austin, TX 78711-3087

Re: INTERCONTINENTAL TERMINALS COMPANY LLC, Air Quality Permit Number 95754

Dear Ms. Bohac,

Thank you for the opportunity to provide comments for the proposed amendments to permit 95754 for Intercontinental Terminals Company LLC (ITC).

It is the understanding of Air Alliance Houston that ITC is seeking authorization that would allow significant increases in the the annual emissions of various volatile organic compounds (VOC) from their Pasadena facility that is within a decimal point of the threshold that would subject the facility to Major Source status and trigger Nonattainment New Source Review (NSSR) and Prevention of Significant Deterioration (PSD) reviews and analyses. We are also anecdotally aware that the accuracy of many emissions estimation methods are susceptible to calculation errors, false assumptions, and bad-faith manipulation.

In addition to these concerns, we remain aware of the recent catastrophic failure at the ITC tank farm that began March 17, 2019 and continued for 106 days according to the information documented by ITC in STEERS and represented in Air Emissions Event Report Database incident 304871. According to that same report, this event resulted in over 15 million pounds of air pollution including nearly 5 million pounds (~2,420 tons) of VOC emissions. The estimated benzene emissions from this event alone were estimated to be over 715,000 pounds (~358 tons). However one looks at it, this single event far exceeds the annual emissions thresholds that define a Major Source emitter as defined by the EPA, and we contend that this event is a practical demonstration of the emissions potential for this facility that is not represented in the emissions estimates of their permit modification application.

Given the potential for the emissions estimates represented in ITC's application to be underrepresented and the facility's recent history of catastrophic process failure, we therefore

request that the permit application under consideration be rejected as written and revised to consider the facility as a Major Emitter subject to NSSR and PSD analyses, the requisite reporting requirements associated with this status, and the strongest pollution control and hazard mitigation requirements that may accompany this status.

Thank you for your time and consideration,

A handwritten signature in black ink, appearing to read "Bakeyah S. Nelson". The signature is fluid and cursive, with the first name being the most prominent.

Bakeyah S. Nelson Ph.D.
Executive Director, Air Alliance Houston

A handwritten signature in black ink, appearing to read "Corey Williams". The signature is cursive and includes a long, sweeping horizontal line at the end.

Corey Williams
Policy and Research Director, Air Alliance Houston