

FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO
Savage Gulf Rail, LLC

AUTHORIZING THE OPERATION OF
SGR Railyard
Savage Railyard
All Other Basic Organic Chemical Manufacturing

LOCATED AT
San Patricio County, Texas
Latitude 27° 55' 39" Longitude 97° 18' 23"
Regulated Entity Number: RN109803767

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No: O4236 Issuance Date: _____

For the Commission

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General Terms and Conditions

The permit holder shall comply with all terms and conditions contained in 30 TAC § 122.143 (General Terms and Conditions), 30 TAC § 122.144 (Recordkeeping Terms and Conditions), 30 TAC § 122.145 (Reporting Terms and Conditions), and 30 TAC § 122.146 (Compliance Certification Terms and Conditions).

In accordance with 30 TAC § 122.144(1), records of required monitoring data and support information required by this permit, or any applicable requirement codified in this permit, are required to be maintained for a period of five years from the date of the monitoring report, sample, or application unless a longer data retention period is specified in an applicable requirement. The five year record retention period supersedes any less stringent retention requirement that may be specified in a condition of a permit identified in the New Source Review Authorization attachment.

If the permit holder chooses to demonstrate that this permit is no longer required, a written request to void this permit shall be submitted to the Texas Commission on Environmental Quality (TCEQ) by the Responsible Official in accordance with 30 TAC § 122.161(e). The permit holder shall comply with the permit's requirements, including compliance certification and deviation reporting, until notified by the TCEQ that this permit is voided.

The permit holder shall comply with 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit.

All reports required by this permit must include in the submittal a cover letter which identifies the following information: company name, TCEQ regulated entity number, air account number (if assigned), site name, area name (if applicable), and Air Permits Division permit number(s).

Special Terms and Conditions:

Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

1. Permit holder shall comply with the following requirements:
 - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
 - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.
 - C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
 - D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):

- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
 - B. Title 30 TAC § 101.3 (relating to Circumvention)
 - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
 - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
 - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
 - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
 - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
 - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
 - I. Title 30 TAC § 101.222 (relating to Demonstrations)
 - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
- A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
 - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
 - (ii) Title 30 TAC § 111.111(a)(1)(E)
 - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
 - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the “Applicable Requirements Summary” attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

- (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
- (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum required value does not constitute creation of an alternative fuel.
- (3) Records of all observations shall be maintained.
- (4) Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
- (5) Compliance Certification:
 - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
 - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as

required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.
 - B. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
 - C. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
 - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
 - (ii) Sources with an effective stack height (h_e) less than the standard effective stack height (H_e), must reduce the allowable emission level by multiplying it by $[h_e/H_e]^2$ as required in 30 TAC § 111.151(b)
 - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)
- 4. The permit holder shall comply with certified registrations submitted to the TCEQ for purposes of establishing federally enforceable emission limits. A copy of the certified registration shall be maintained with the permit. Records sufficient to demonstrate compliance with the established limits shall be maintained. The certified registration and records demonstrating compliance shall be provided, on request, to representatives of the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction over the site. The permit holder shall submit updated certified registrations when changes at the site require establishment of new emission limits. If changes result in emissions that do not remain below major source thresholds, the permit holder shall submit a revision application to codify the appropriate requirements in the permit.

New Source Review Authorization Requirements

- 5. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated May 28, 2025 in the application for project 38259), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
 - A. Are incorporated by reference into this permit as applicable requirements
 - B. Shall be located with this operating permit
 - C. Are not eligible for a permit shield
- 6. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.

7. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).

Compliance Requirements

8. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 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. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
9. Use of Discrete Emission Credits to comply with the applicable requirements:
 - A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
 - (i) Title 30 TAC Chapter 115
 - (ii) Title 30 TAC Chapter 117
 - (iii) If applicable, offsets for Title 30 TAC Chapter 116
 - (iv) Temporarily exceed state NSR permit allowables
 - B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
 - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
 - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
 - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
 - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
 - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

Permit Location

10. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit on site.

Permit Shield (30 TAC § 122.148)

11. A permit shield is granted for the emission units, groups, or processes specified in the attached "Permit Shield." Compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements listed in the attachment "Permit Shield." Permit shield provisions shall not be modified by the executive director until notification is provided to the permit holder. No later than 90 days after notification of a change in a determination made by the executive director, the permit holder shall apply for the appropriate permit revision to reflect the new determination. Provisional terms are not eligible for this permit shield. Any term or condition, under a permit shield, shall not be protected by the permit shield if it is replaced by a provisional term or condition or the basis of the term and condition changes.

Attachments

Applicable Requirements Summary

Permit Shield

New Source Review Authorization References

Applicable Requirements Summary

Unit Summary 9

Applicable Requirements Summary 10

Note: A “none” entry may be noted for some emission sources in this permit’s “Applicable Requirements Summary” under the heading of “Monitoring and Testing Requirements” and/or “Recordkeeping Requirements” and/or “Reporting Requirements.” Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
GRP-FILVENT	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	RYLOAD3, RYLOAD4, RYLOAD7, RYLOAD8	R5121-01	30 TAC Chapter 115, Vent Gas Controls	No changing attributes.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
GRP-FILVENT	EP	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	§ 115.127(c)(1)(C) § 115.127(c)(1)	A vent gas stream having a concentration of the VOC specified in §115.121(c)(1)(B) and (C) of this title less than 30,000 ppmv is exempt from the requirements of §115.121(c)(1) of this title.	[G]§ 115.125 § 115.126(2)	§ 115.126 § 115.126(2) § 115.126(4)	None

Permit Shield

Permit Shield 12

Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit / Group / Process ID No.	Group / Inclusive Units	Regulation	Basis of Determination
GRP-FILVENT	RYLOAD3, RYLOAD4, RYLOAD7, RYLOAD8	40 CFR Part 63, Subpart FFFF	Equipment at the end of a process that produces a solid material and is downstream of the dryers, and not part of the process. See definition of Miscellaneous organic chemical manufacturing process, definition item (6) in § 63.2550.

New Source Review Authorization References

New Source Review Authorization References 14

New Source Review Authorization References by Emission Unit 15

New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Prevention of Significant Deterioration (PSD) Permits	
PSD Permit No.: PSDTX1520	Issuance Date: 10/14/2021
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 146959	Issuance Date: 10/14/2021
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.452	Version No./Date: 09/04/2000

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
RYLOAD_3	LOADING FILTER	146959, PSDTX1520
RYLOAD_4	LOADING FILTER	146959, PSDTX1520
RYLOAD_7	LOADING FILTER	146959, PSDTX1520
RYLOAD_8	LOADING FILTER	146959, PSDTX1520

**This column may include Permit by Rule (PBR) numbers and version dates, PBR Registration numbers in brackets, Standard Permit Registration numbers, Minor NSR permit numbers, and Major NSR permit numbers.

Appendix A

Acronym List 17

Acronym List

The following abbreviations or acronyms may be used in this permit:

ACFM	actual cubic feet per minute
AMOC	alternate means of control
ARP	Acid Rain Program
ASTM	American Society of Testing and Materials
B/PA	Beaumont/Port Arthur (nonattainment area)
CAM	Compliance Assurance Monitoring
CD	control device
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
COMS	continuous opacity monitoring system
CVS	closed vent system
D/FW	Dallas/Fort Worth (nonattainment area)
EP	emission point
EPA	U.S. Environmental Protection Agency
EU	emission unit
FCAA Amendments	Federal Clean Air Act Amendments
FOP	federal operating permit
gr/100 scf	grains per 100 standard cubic feet
HAP	hazardous air pollutant
H/G/B	Houston/Galveston/Brazoria (nonattainment area)
H ₂ S	hydrogen sulfide
ID No.	identification number
lb/hr	pound(s) per hour
MACT	Maximum Achievable Control Technology (40 CFR Part 63)
MMBtu/hr	Million British thermal units per hour
NA	nonattainment
N/A	not applicable
NADB	National Allowance Data Base
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61)
NO _x	nitrogen oxides
NSPS	New Source Performance Standard (40 CFR Part 60)
NSR	New Source Review
ORIS	Office of Regulatory Information Systems
Pb	lead
PBR	Permit By Rule
PEMS	predictive emissions monitoring system
PM	particulate matter
ppmv	parts per million by volume
PRO	process unit
PSD	prevention of significant deterioration
psia	pounds per square inch absolute
RO	Responsible Official
SIP	state implementation plan
SO ₂	sulfur dioxide
TCEQ	Texas Commission on Environmental Quality
TSP	total suspended particulate
TVP	true vapor pressure
U.S.C.	United States Code
VOC	volatile organic compound

Appendix B

Major NSR Summary Table 19

Major NSR Summary Table

Permit Numbers: 146959 and PSDTX1520					Issuance Date: October 14, 2021		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
RYLOAD_1	EPE Line 1A Elutriator	VOC	—	—	2,3, 8	2,3, 8, 9	2, 3
		PM	—	—			
		PM ₁₀	—	—			
		PM _{2.5}	—	—			
RYLOAD_2	EPE Line 1B Elutriator	VOC	—	—	2,3, 8	2,3, 8, 9	2, 3
		PM	—	—			
		PM ₁₀	—	—			
		PM _{2.5}	—	—			
RYLOAD_3	EPE Hopper Car Loading Filter 1	VOC	—	—	2,3, 8	2,3, 8, 9	2, 3
		PM	—	—			
		PM ₁₀	—	—			
		PM _{2.5}	—	—			
RYLOAD_4	EPE Hopper Car Loading Filter 2	VOC	—	—	2,3, 8	2,3, 8, 9	2, 3
		PM	—	—			

Major NSR Summary Table

Permit Numbers: 146959 and PSDTX1520					Issuance Date: October 14, 2021		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		PM ₁₀	—	—			
		PM _{2.5}	—	—			
E_LOAD	Total Emissions from EPNs RYLOAD_1, RYLOAD_2, RYLOAD_3, RYLOAD_4	VOC	55.10	—	2, 3, 6, 8	2, 3, 8, 9	2, 3
		PM	0.08	0.33			
		PM ₁₀	0.08	0.33			
		PM _{2.5}	0.08	0.33			
RYLOAD_5	CPE Line 2A Elutriator	VOC	—	—	2, 3, 8	2, 3, 8, 9	2, 3
		PM	—	—			
		PM ₁₀	—	—			
		PM _{2.5}	—	—			
RYLOAD_6	CPE Line 2B Elutriator	VOC	—	—	2, 3, 8	2, 3, 8, 9	2, 3
		PM	—	—			
		PM ₁₀	—	—			
		PM _{2.5}	—	—			

Major NSR Summary Table

Permit Numbers: 146959 and PSDTX1520					Issuance Date: October 14, 2021		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
RYLOAD_7	CPE Hopper Car Loading Filter 1	VOC	—	—	2, 3, 8	2, 3, 8, 9	2, 3
		PM	—	—			
		PM ₁₀	—	—			
		PM _{2.5}	—	—			
RYLOAD_8	CPE Hopper Car Loading Filter 2	VOC	—	—	2, 3, 8	2, 3, 8, 9	2, 3
		PM	—	—			
		PM ₁₀	—	—			
		PM _{2.5}	—	—			
C_LOAD	Total Emissions from EPNs RYLOAD_5, RYLOAD_6, RYLOAD_7, RYLOAD_8	VOC	55.10	—	2, 3, 6, 8	2, 3, 8, 9	2, 3
		PM	0.08	0.33			
		PM ₁₀	0.08	0.33			
		PM _{2.5}	0.08	0.33			
CAP	Total Emissions from EPNs E_LOAD, C_LOAD	VOC	—	35.83	2, 3, 6, 8	2, 3, 8, 9	2, 3
		PM	—	0.33			

Major NSR Summary Table

Permit Numbers: 146959 and PSDTX1520					Issuance Date: October 14, 2021		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		PM ₁₀	—	0.33			
		PM _{2.5}	—	0.33			

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
 PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
 PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
 PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
- (4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.



Texas Commission on Environmental Quality Air Quality Permit

A Permit Is Hereby Issued To
Savage Gulf Rail, LLC
Authorizing the Construction and Operation of
GCGV Railyard
Located at Gregory, San Patricio County, Texas
Latitude 27° 56' 5" Longitude -97° 19' 4"

Permits: 146959 and PSDTX1520

Revision Date: October 14, 2021

Expiration Date: June 12, 2029

For the Commission

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code (TAC) Section 116.116 (30 TAC § 116.116)]¹
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]
6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and

operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction in a timely manner; comply with any additional recordkeeping requirements specified in special conditions in the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]

8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources-- Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)]¹
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification in accordance with 30 TAC §101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC§ 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]
11. **This** permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]
12. **There** may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]
13. **Emissions** from this facility must not cause or contribute to "air pollution" as defined in Texas Health and Safety Code (THSC) §382.003(3) or violate THSC § 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
14. **The** permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit.¹

¹ Please be advised that the requirements of this provision of the general conditions may not be applicable to greenhouse gas emissions.

Common Acronyms in Air Permits

°C = Temperature in degrees Celsius	GLC _{max} = maximum (predicted) ground-level concentration
°F = Temperature in degrees Fahrenheit	gpm = gallon per minute
°K = Temperature in degrees Kelvin	gr/1000scf = grain per 1000 standard cubic feet
µg = microgram	gr/dscf = grain per dry standard cubic feet
µg/m ³ = microgram per cubic meter	H ₂ CO = formaldehyde
acfm = actual cubic feet per minute	H ₂ S = hydrogen sulfide
AMOC = alternate means of control	H ₂ SO ₄ = sulfuric acid
AOS = alternative operating scenario	HAP = hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
AP-42 = Air Pollutant Emission Factors, 5th edition	HC = hydrocarbons
APD = Air Permits Division	HCl = hydrochloric acid, hydrogen chloride
API = American Petroleum Institute	Hg = mercury
APWL = air pollutant watch list	HGB = Houston/Galveston/Brazoria
BPA = Beaumont/ Port Arthur	hp = horsepower
BACT = best available control technology	hr = hour
BAE = baseline actual emissions	IFR = internal floating roof tank
bbl = barrel	in H ₂ O = inches of water
bbl/day = barrel per day	in Hg = inches of mercury
bhp = brake horsepower	IR = infrared
BMP = best management practices	ISC3 = Industrial Source Complex, a dispersion model
Btu = British thermal unit	ISCST3 = Industrial Source Complex Short-Term, a dispersion model
Btu/scf = British thermal unit per standard cubic foot or feet	K = Kelvin; extension of the degree Celsius scaled-down to absolute zero
CAA = Clean Air Act	LACT = lease automatic custody transfer
CAM = compliance-assurance monitoring	LAER = lowest achievable emission rate
CEMS = continuous emissions monitoring systems	lb = pound
cfm = cubic feet (per) minute	hp = horsepower
CFR = Code of Federal Regulations	hr = hour lb/day = pound per day
CN = customer ID number	lb/hr = pound per hour
CNG = compressed natural gas	lb/MMBtu = pound per million British thermal units
CO = carbon monoxide	LDAR = Leak Detection and Repair (Requirements)
COMS = continuous opacity monitoring system	LNG = liquefied natural gas
CPMS = continuous parametric monitoring system	LPG = liquefied petroleum gas
DFW = Dallas/ Fort Worth (Metroplex)	LT/D = long ton per day
DE = destruction efficiency	m = meter
DRE = destruction and removal efficiency	m ³ = cubic meter
dscf = dry standard cubic foot or feet	m/sec = meters per second
dscfm = dry standard cubic foot or feet per minute	MACT = maximum achievable control technology
ED = (TCEQ) Executive Director	MAERT = Maximum Allowable Emission Rate Table
EF = emissions factor	MERA = Modeling and Effects Review Applicability
EFR = external floating roof tank	mg = milligram
EGU = electric generating unit	mg/g = milligram per gram
EI = Emissions Inventory	mL = milliliter
ELP = El Paso	MMBtu = million British thermal units
EPA = (United States) Environmental Protection Agency	MMBtu/hr = million British thermal units per hour
EPN = emission point number	MSDS = material safety data sheet
ESL = effects screening level	MSS = maintenance, startup, and shutdown
ESP = electrostatic precipitator	MW = megawatt
FCAA = Federal Clean Air Act	NAAQS = National Ambient Air Quality Standards
FCCU = fluid catalytic cracking unit	NESHAP = National Emission Standards for Hazardous Air Pollutants
FID = flame ionization detector	NGL = natural gas liquids
FIN = facility identification number	NNSR = nonattainment new source review
ft = foot or feet	NO _x = total oxides of nitrogen
ft/sec = foot or feet per second	
g = gram	
gal/wk = gallon per week	
gal/yr = gallon per year	
GLC = ground level concentration	

NSPS = New Source Performance Standards
PAL = plant-wide applicability limit
PBR = Permit(s) by Rule
PCP = pollution control project
PEMS = predictive emission monitoring system
PID = photo ionization detector
PM = periodic monitoring
PM = total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
PM_{2.5} = particulate matter equal to or less than 2.5 microns in diameter
PM₁₀ = total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
POC = products of combustion
ppb = parts per billion
ppm = parts per million
ppmv = parts per million (by) volume
psia = pounds (per) square inch, absolute
psig = pounds (per) square inch, gage
PTE = potential to emit
RA = relative accuracy
RATA = relative accuracy test audit
RM = reference method
RVP = Reid vapor pressure
scf = standard cubic foot or feet
scfm = standard cubic foot or feet (per) minute
SCR = selective catalytic reduction
SIL = significant impact levels
SNCR = selective non-catalytic reduction
SO₂ = sulfur dioxide
SOCMI = synthetic organic chemical manufacturing industry
SRU = sulfur recovery unit
TAC = Texas Administrative Code
TCAA = Texas Clean Air Act
TCEQ = Texas Commission on Environmental Quality
TD = Toxicology Division
TLV = threshold limit value
TMDL = total maximum daily load
tpd = tons per day
tpy = tons per year
TVP = true vapor pressure
VOC = volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
VRU = vapor recovery unit or system

Special Conditions

Permit Number 146959 and PSDTX1520

1. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources – Maximum Allowable Emission Rates" (MAERT), and those sources are limited to the emission limits and other conditions specified in that table

Emission Standards and Operational Specifications

2. Particulate matter outlet grain shall not exceed 0.005 gr/dscf of air from any vent. There shall be no visible emissions exceeding 30 seconds in any six-minute period as determined using U.S. Environmental Agency (EPA) Test Method 22.

The vents covered by this permit shall not operate unless control devices and associated equipment are maintained in good working order and operating. All vents identified in Special Condition 4 shall be inspected for visible emissions once per day while in operation and a spare parts filter inventory will be maintained on site. Records shall be maintained of all inspections and maintenance performed. **(10/21)**

3. The following requirements apply to the particulate control devices identified in Special Condition 4. **(10/21)**
 - A. The differential pressure across particulate control device for EPNs RYLOAD_1, 2, 5, and 6 shall be continuously monitored and be recorded at least once an hour during loading operations.
 - B. Prior to the start of operation of the facilities covered by this permit, the permit holder shall complete the following:
 - (1) Submit a complete TCEQ Table 11 for each control device; and
 - (2) During facility operations, monitoring of filters or baghouses:
 - (a) The permit holder shall inspect Hopper Car Load filters once per day during loading operation for that hopper (EPNs RYLOAD_3, 4, 7, and 8) per manufacturer's recommendation. If a filter malfunctions or shows signs of damage, car loading will be shifted to another compartment, and the filter will be replaced immediately following the loading operation for the hopper. Filters will not be replaced during the loading operation for the hopper it is controlling. Malfunctioning or damaged filters will be immediately replaced following the loading operation of the specified hopper.
 - (b) Maintain the differential pressure across each control device within manufacturer's specifications for EPNs RYLOAD_1, 2, 5, and 6. Relevant manufacturer's specifications shall be conspicuously displayed near each control device.
 - C. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or at least annually, whichever is more frequent, and shall be accurate to within 0.5 inches water gauge pressure or 0.5 percent of span.

D. Quality assured (or valid) data must be generated when the facility is operating except during the performance of a daily zero check. Loss of a valid data due to periods of monitor breakdown, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in hours) that the pellet transfer system operated over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgement and methods used recorded.

4. The following sources of particulate emissions are covered by the permit.

Source Name	Vent Type	EPN
EPE Line 1A Elutriator Cyclone	Baghouse	RYLOAD_1
EPE Line 1B Elutriator Cyclone	Baghouse	RYLOAD_2
EPE Hopper Car Loading Filter 1	Fabric Filter	RYLOAD_3
EPE Hopper Car Loading Filter 2	Fabric Filter	RYLOAD_4
CPE Line 2A Elutriator Cyclone	Baghouse	RYLOAD_5
CPE Line 2B Elutriator Cyclone	Baghouse	RYLOAD_6
CPE Hopper Car Loading Filter 1	Fabric Filter	RYLOAD_7
CPE Hopper Car Loading Filter 2	Fabric Filter	RYLOAD_8

Continuous Demonstration of Compliance

- The Permit holder shall have the authority to reject any shipment of polyethylene resin if the permit holder determines that acceptance of such a shipment would result in a violation of the VOC emission limitations of this permit.
- Compliance with the VOC emission limitations for EPNs E_LOAD, C_LOAD, and CAP shall be based on the difference between the total VOC content of samples of polyethylene resin taken immediately after the purge columns for the process lines E and C in permit 146425 (“points A”); and final loadouts in the railcars (“point B”), the transfer rates and amounts loaded. The emissions for the EPNs will be based on rates and amounts of the product types loaded and 50% of the product analysis differences as represented in the permit applications for the Railyard. The sampling and emissions weighting procedures shall be as specified in permit 146425. **(4/21)**

Planned Maintenance, Startup and Shutdown

7. This permit authorizes the following planned maintenance, startup and shutdown activities:
(10/21)
 - A. Bag Filter Change-outs and use of aerosol cans.
8. Emissions from activities identified in special condition 7 shall be considered equal to the potential to emit represented in the permit application. The estimated emissions from these activities must be revalidated annually. This revalidation shall consist of the estimated emissions for each type of activity and the basis for that emission estimate. **(10/21)**
9. The records retention period specified under General Condition 7 shall be extended to five years.

Date: October 14, 2021

Emission Sources - Maximum Allowable Emission Rates

Permit Numbers 146959 and PSDTX1520

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
RYLOAD_1	EPE Line 1A Elutriator	VOC	—	—
		PM	—	—
		PM ₁₀	—	—
		PM _{2.5}	—	—
RYLOAD_2	EPE Line 1B Elutriator	VOC	—	—
		PM	—	—
		PM ₁₀	—	—
		PM _{2.5}	—	—
RYLOAD_3	EPE Hopper Car Loading Filter 1	VOC	—	—
		PM	—	—
		PM ₁₀	—	—
		PM _{2.5}	—	—
RYLOAD_4	EPE Hopper Car Loading Filter 2	VOC	—	—
		PM	—	—
		PM ₁₀	—	—
		PM _{2.5}	—	—
E_LOAD	Total Emissions from EPNs RYLOAD_1, RYLOAD_2, RYLOAD_3, RYLOAD_4	VOC	55.10	—
		PM	0.08	0.33
		PM ₁₀	0.08	0.33
		PM _{2.5}	0.08	0.33
RYLOAD_5	CPE Line 2A Elutriator	VOC	—	—
		PM	—	—
		PM ₁₀	—	—
		PM _{2.5}	—	—

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
RYLOAD_6	CPE Line 2B Elutriator	VOC	—	—
		PM	—	—
		PM ₁₀	—	—
		PM _{2.5}	—	—
RYLOAD_7	CPE Hopper Car Loading Filter 1	VOC	—	—
		PM	—	—
		PM ₁₀	—	—
		PM _{2.5}	—	—
RYLOAD_8	CPE Hopper Car Loading Filter 2	VOC	—	—
		PM	—	—
		PM ₁₀	—	—
		PM _{2.5}	—	—
C_LOAD	Total Emissions from EPNs RYLOAD_5, RYLOAD_6, RYLOAD_7, RYLOAD_8	VOC	55.10	—
		PM	0.08	0.33
		PM ₁₀	0.08	0.33
		PM _{2.5}	0.08	0.33
CAP	Total Emissions from EPNs E_LOAD, C_LOAD	VOC	—	35.83
		PM	—	0.33
		PM ₁₀	—	0.33
		PM _{2.5}	—	0.33

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
- PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
- PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
- (4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.

Emission Sources - Maximum Allowable Emission Rates

- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

Date: October 14, 2021