

Plain Language Summary for New Source Review (NSR) Renewal Amendment Application for Air New Source Review Permit Number 50498

The following summary is provided for this pending air permit application being reviewed by the Texas Commission on Environmental Quality as required by 30 Texas Administrative Code Chapter 39. The information provided in this summary may change during the technical review of the application and are not federal enforceable representations of the permit application.

Texas International Terminals, Ltd. (TxIT) (CN603788084) has submitted an application for renewal and amendment of NSR Permit No. 50498. The Galveston Terminal (RN102501160) receives, stores, and ships bulk solid materials and soda ash at 4800 Old Port Industrial Road, Galveston, Galveston County.

This renewal will authorize the continued operation of four enclosed storage warehouses, a covered conveyor system to transport materials, and rail, marine, and truck loading and unloading operations. The amendment will authorize updates to the current authorization, and revisions to address corrective actions from a voluntary environmental compliance audit. TxIT has listed in the application the pollutants and amounts that will be emitted for each facility. Below is the current amount allowed, the amount to be added or removed, and the total amount for each pollutant that is proposed to be emitted each year for all the facilities.

Pollutant	Permitted Emissions (tons per year)	Emissions Added/Deleted (tons per year)	Total Proposed Emissions (tons per year)
Particulate Matter (PM)	55.80	-9.49	46.31
PM less than 10 microns in diameter (PM ₁₀)	26.53	-9.51	17.02
PM less than 2.5 microns in diameter (PM _{2.5})	8.97	-6.25	2.72

The facilities being renewed continue to be controlled by the following measures:

- Transfer Points – Transfer points on the conveyor system are enclosed using a rubber seal and skirt to prevent ~85% of the particulate emission generation from the transfer (i.e., dust) from venting to the air. The rubber seal keeps dust from escaping through the connections between pieces of the enclosure and the skirt traps the dust underneath it that gets kicked up when product drops from one conveyor to the next.
- Conveyor Systems – Conveyor systems are covered with a hood to minimize dust generated by atmospheric conditions such as wind. The hood limits the wind’s ability to blow across the material on the conveyors and emit dust during the movement of material. Additionally, certain materials more prone to generate dust are sprayed with a fine oil mist, which makes the particles heavier and harder to blow off of the conveyor.
- Storage Piles – All storage piles on-site are contained in warehouses with four walls and a roof to prevent dust emissions from wind. The walls also limit emissions generated by adding material to the stockpile from conveyors or trucks.
- Unloading from Railcars – Material from railcars is dropped from the bottom of the railcar onto an underground conveyor system. There are several dust control methods used to limit emissions from this transfer:
 - Choke flow, which means the unloading rate is limited so that it doesn’t generate excess dust.
 - Material is received on partially covered conveyors underground, underneath the railcars.
 - Baffles, which act like shields, are added underneath the railcar and above the conveyor belt to reduce the open space above the conveyor. The baffles trap the dust underneath that gets kicked up when product drops onto the conveyor belt.

- Unloading from Trucks – Trucks are unloaded directly onto storage piles inside the warehouses; therefore, dust emissions are mostly contained within the building.
- Unloading from Marine Vessels, Loading Railcars and Trucks, and Other Miscellaneous Handling Operations – There are some control measures applied across the facility and/or associated with specific materials processed referred to as Best Management Practices (BMPS), which are industry proven. Some of the BMPs are as follows:
 - Removing fine particulates (i.e., lighter material that produces more dust) from material handled prior to receiving onsite; and
 - Processing materials higher in moisture content, which makes them heavier and harder to produce dust.
- Loading Marine Vessels – A telescoping conveying system equipped with a filter is used to transfer material onto the marine vessels. The telescoping chute uses a series of slides to cradle the material from the conveyor, down the chute, into the marine vessel. The slides reduce the distance that the material falls so there is less dust kicked up as it makes its final drop onto the pile in one of the vessel's compartments. The bottom of the telescoping chute has a skirt, which traps dust underneath it that gets kicked up as product drops from the telescoping chute and onto the pile in the vessel's compartment. The chute extends into the compartment and as the pile gets larger, the chute retracts, staying on top of the pile to continue to limit dust.