# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

March 17, 2025

MR MIKE ALVARADO
PRESIDENT
BROTMAN GENERATING LLC
2001 PROENERGY BLVD
SEDALIA MO 65301-2470

Re: Electric Generating Units Air Quality Standard Permit Revision
(Effective 5/16/2007)
Standard Permit Registration Number: 163849
Standard Permit Expiration Date: January 28, 2031
Brotman Generating LLC
Brotman Power Station
Rosharon, Brazoria County
Regulated Entity Number: RN111170924
Customer Reference Number: CN605850023

Dear Mr. Alvarado:

Brotman Generating, LLC submitted an application on February 21, 2025, to register construction related to Electric Generating Units to be located at 1920 County Road 52, Rosharon, Brazoria County. We understand that this registration is for emissions associated with six turbines and ancillary equipment located at the Brotman Power Station.

The Texas Commission on Environmental Quality (TCEQ) has determined that your proposed emissions are authorized by this standard permit pursuant to Title 30 Texas Administrative Code § 116.602 and Texas Health and Safety Code § 382.05195, if constructed and operated as described in your registration. Authorized emissions are listed on the attached table.

You are reminded that 30 TAC § 116.615 requires that any construction or change authorized by this standard permit be administratively incorporated into the affected facilities' permit(s) at the next amendment or renewal.

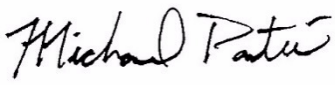
You are also reminded that these facilities must comply with all rules and regulations of the TCEQ and of the U.S. Environmental Protection Agency at all times.

Permittees must report the operational status for each relevant standard permit registration by December 31st of each year electronically through the State of Texas Environmental Electronic Reporting System (STEERS). More information is available at www.tceq.texas.gov/permitting/air/annual-reporting-requirements-airpermits.

If you need further information or have any questions, please contact Ms. Jana Banigo at (512) 239-3112 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Re: Standard Permit Registration Number 163849

Sincerely,



Michael Partee, Manager
Rule Registrations Section
Air Permits Division
Texas Commission on Environmental Quality

cc: Director, Environmental Health, Brazoria County Health Department, Angleton
Air Section Manager, Region 12 - Houston

Project Number: 389276

Standard Permit Maximum Emission Rates Table
Permit Number 163849

The facilities and emissions included in this table have been represented and reviewed as the maximum emissions authorized by this standard permit registration.

| Emission Point No. | Source Name | Pollutant | Authorized Emissions | |
|---|---|---|---|---|
| | | | lbs/hr | tpy |
| CT-1 | Combustion Turbine 1 (Normal Operations) | $NO_x$ | 7.28 | -- |
| | | **CO** | 10.28 | -- |
| | | **VOC** | 3.60 | -- |
| | | **PM** | 5.88 | -- |
| | | $PM_{10}$ | 5.88 | -- |
| | | $PM_{2.5}$ | 5.88 | -- |
| | | $SO_2$ | 1.43 | -- |
| | | $H_2SO_4$ | 0.66 | -- |
| | | $(NH_4)_2SO_4$ | 0.88 | -- |
| | | $NH_3$ | 6.94 | -- |
| CT-1 | Combustion Turbine 1 (MSS) | $NO_x$ | 37.21 | -- |
| | | **CO** | 51.71 | -- |
| | | **VOC** | 3.64 | -- |
| | | **PM** | 5.88 | -- |
| | | $PM_{10}$ | 5.88 | -- |
| | | $PM_{2.5}$ | 5.88 | -- |
| | | $SO_2$ | 1.43 | -- |
| | | $H_2SO_4$ | 0.66 | -- |
| | | $(NH_4)_2SO_4$ | 0.88 | -- |
| | | $NH_3$ | 6.94 | -- |
| CT-1 | Combustion Turbine 1 (Combined Normal and MSS Emissions) | $NO_x$ | -- | 19.16 |
| | | **CO** | -- | 14.64 |
| | | **VOC** | -- | 14.64 |
| | | **PM** | -- | 25.50 |
| | | $PM_{10}$ | -- | 25.50 |
| | | $PM_{2.5}$ | -- | 25.50 |
| | | $SO_2$ | -- | 5.82 |
| | | $H_2SO_4$ | -- | 2.67 |
| | | $(NH_4)_2SO_4$ | -- | 3.60 |

| | | | | |
|---|---|---|---|---|
| | | $NH_3$ | -- | 20.33 |
| CT-2 | Combustion Turbine 2 (Normal Operations) | $NO_x$ | 7.28 | -- |
| | | **CO** | 10.28 | -- |
| | | **VOC** | 3.60 | -- |
| | | **PM** | 5.88 | -- |
| | | $PM_{10}$ | 5.88 | -- |
| | | $PM_{2.5}$ | 5.88 | -- |
| | | $SO_2$ | 1.43 | -- |
| | | $H_2SO_4$ | 0.66 | -- |
| | | $(NH_4)_2SO_4$ | 0.88 | -- |
| | | $NH_3$ | 6.94 | -- |
| CT-2 | Combustion Turbine 2 (MSS) | $NO_x$ | 37.21 | -- |
| | | **CO** | 51.71 | -- |
| | | **VOC** | 3.64 | -- |
| | | **PM** | 5.88 | -- |
| | | $PM_{10}$ | 5.88 | -- |
| | | $PM_{2.5}$ | 5.88 | -- |
| | | $SO_2$ | 1.43 | -- |
| | | $H_2SO_4$ | 0.66 | -- |
| | | $(NH_4)_2SO_4$ | 0.88 | -- |
| | | $NH_3$ | 6.94 | -- |
| CT-2 | Combustion Turbine 2 (Combined Normal and MSS Emissions) | $NO_x$ | -- | 19.16 |
| | | **CO** | -- | 14.64 |
| | | **VOC** | -- | 14.64 |
| | | **PM** | -- | 25.50 |
| | | $PM_{10}$ | -- | 25.50 |
| | | $PM_{2.5}$ | -- | 25.50 |
| | | $SO_2$ | -- | 5.82 |
| | | $H_2SO_4$ | -- | 2.67 |
| | | $(NH_4)_2SO_4$ | -- | 3.60 |
| | | $NH_3$ | -- | 20.33 |
| CT-3 | Combustion Turbine 3 (Normal Operations) | $NO_x$ | 7.28 | -- |
| | | **CO** | 10.28 | -- |
| | | **VOC** | 3.60 | -- |
| | | **PM** | 5.88 | -- |
| | | $PM_{10}$ | 5.88 | -- |
| | | $PM_{2.5}$ | 5.88 | -- |

| | | | | |
|---|---|---|---|---|
| | | $SO_2$ | 1.43 | -- |
| | | $H_2SO_4$ | 0.66 | -- |
| | | $(NH_4)_2SO_4$ | 0.88 | -- |
| | | $NH_3$ | 6.94 | -- |
| CT-3 | Combustion Turbine 3 (MSS) | $NO_x$ | 37.21 | -- |
| | | **CO** | 51.71 | -- |
| | | **VOC** | 3.64 | -- |
| | | **PM** | 5.88 | -- |
| | | $PM_{10}$ | 5.88 | -- |
| | | $PM_{2.5}$ | 5.88 | -- |
| | | $SO_2$ | 1.43 | -- |
| | | $H_2SO_4$ | 0.66 | -- |
| | | $(NH_4)_2SO_4$ | 0.88 | -- |
| | | $NH_3$ | 6.94 | -- |
| CT-3 | Combustion Turbine 3 (Combined Normal and MSS Emissions) | $NO_x$ | -- | 19.16 |
| | | **CO** | -- | 14.64 |
| | | **VOC** | -- | 14.64 |
| | | **PM** | -- | 25.50 |
| | | $PM_{10}$ | -- | 25.50 |
| | | $PM_{2.5}$ | -- | 25.50 |
| | | $SO_2$ | -- | 5.82 |
| | | $H_2SO_4$ | -- | 2.67 |
| | | $(NH_4)_2SO_4$ | -- | 3.60 |
| | | $NH_3$ | -- | 20.33 |
| CT-4 | Combustion Turbine 4 (Normal Operations) | $NO_x$ | 7.28 | -- |
| | | **CO** | 10.28 | -- |
| | | **VOC** | 3.60 | -- |
| | | **PM** | 5.88 | -- |
| | | $PM_{10}$ | 5.88 | -- |
| | | $PM_{2.5}$ | 5.88 | -- |
| | | $SO_2$ | 1.43 | -- |
| | | $H_2SO_4$ | 0.66 | -- |
| | | $(NH_4)_2SO_4$ | 0.88 | -- |
| | | $NH_3$ | 6.94 | -- |
| | | $NO_x$ | 37.21 | -- |
| | | **CO** | 51.71 | -- |
| | | **VOC** | 3.64 | -- |
| | | | | |

| | | | | |
|---|---|---|---|---|
| | | **PM** | 5.88 | -- |
| | | $PM_{10}$ | 5.88 | -- |
| | | $PM_{2.5}$ | 5.88 | -- |
| | | $SO_2$ | 1.43 | -- |
| | | $H_2SO_4$ | 0.66 | -- |
| | | $(NH_4)_2SO_4$ | 0.88 | -- |
| | | $NH_3$ | 6.94 | -- |
| CT-4 | Combustion Turbine 4 (Combined Normal and MSS Emissions) | $NO_x$ | -- | 19.16 |
| | | **CO** | -- | 14.64 |
| | | **VOC** | -- | 14.64 |
| | | **PM** | -- | 25.50 |
| | | $PM_{10}$ | -- | 25.50 |
| | | $PM_{2.5}$ | -- | 25.50 |
| | | $SO_2$ | -- | 5.82 |
| | | $H_2SO_4$ | -- | 2.67 |
| | | $(NH_4)_2SO_4$ | -- | 3.60 |
| | | $NH_3$ | -- | 20.33 |
| CT-5 | Combustion Turbine 5 (Normal Operations) | $NO_x$ | 7.28 | -- |
| | | **CO** | 10.28 | -- |
| | | **VOC** | 3.60 | -- |
| | | **PM** | 5.88 | -- |
| | | $PM_{10}$ | 5.88 | -- |
| | | $PM_{2.5}$ | 5.88 | -- |
| | | $SO_2$ | 1.43 | -- |
| | | $H_2SO_4$ | 0.66 | -- |
| | | $(NH_4)_2SO_4$ | 0.88 | -- |
| | | $NH_3$ | 6.94 | -- |
| CT-5 | Combustion Turbine 5 (MSS) | $NO_x$ | 37.21 | -- |
| | | **CO** | 51.71 | -- |
| | | **VOC** | 3.64 | -- |
| | | **PM** | 5.88 | -- |
| | | $PM_{10}$ | 5.88 | -- |
| | | $PM_{2.5}$ | 5.88 | -- |
| | | $SO_2$ | 1.43 | -- |
| | | $H_2SO_4$ | 0.66 | -- |
| | | $(NH_4)_2SO_4$ | 0.88 | -- |
| | | $NH_3$ | 6.94 | -- |

| | | | | |
|---|---|---|---|---|
| CT-5 | Combustion Turbine 5 (Combined Normal and MSS Emissions) | $NO_x$ | -- | 19.16 |
| | | **CO** | -- | 14.64 |
| | | **VOC** | -- | 14.64 |
| | | **PM** | -- | 25.50 |
| | | $PM_{10}$ | -- | 25.50 |
| | | $PM_{2.5}$ | -- | 25.50 |
| | | $SO_2$ | -- | 5.82 |
| | | $H_2SO_4$ | -- | 2.67 |
| | | $(NH_4)_2SO_4$ | -- | 3.60 |
| | | $NH_3$ | -- | 20.33 |
| CT-6 | Combustion Turbine 6 (Normal Operations) | $NO_x$ | 7.28 | -- |
| | | **CO** | 10.28 | -- |
| | | **VOC** | 3.60 | -- |
| | | **PM** | 5.88 | -- |
| | | $PM_{10}$ | 5.88 | -- |
| | | $PM_{2.5}$ | 5.88 | -- |
| | | $SO_2$ | 1.43 | -- |
| | | $H_2SO_4$ | 0.66 | -- |
| | | $(NH_4)_2SO_4$ | 0.88 | -- |
| | | $NH_3$ | 6.94 | -- |
| CT-6 | Combustion Turbine 6 (MSS) | $NO_x$ | 37.21 | -- |
| | | **CO** | 51.71 | -- |
| | | **VOC** | 3.64 | -- |
| | | **PM** | 5.88 | -- |
| | | $PM_{10}$ | 5.88 | -- |
| | | $PM_{2.5}$ | 5.88 | -- |
| | | $SO_2$ | 1.43 | -- |
| | | $H_2SO_4$ | 0.66 | -- |
| | | $(NH_4)_2SO_4$ | 0.88 | -- |
| | | $NH_3$ | 6.94 | -- |
| CT-6 | Combustion Turbine 6 (Combined Normal and MSS Emissions) | $NO_x$ | -- | 19.16 |
| | | **CO** | -- | 14.64 |
| | | **VOC** | -- | 14.64 |
| | | **PM** | -- | 25.50 |
| | | $PM_{10}$ | -- | 25.50 |
| | | $PM_{2.5}$ | -- | 25.50 |
| | | $SO_2$ | -- | 5.82 |

| | | | | |
|---|---|---|---|---|
| | | $H_2SO_4$ | -- | 2.67 |
| | | $(NH_4)_2SO_4$ | -- | 3.60 |
| | | $NH_3$ | -- | 20.33 |
| CT-1 through CT-6 | Annual Emissions Cap for Combustion Turbine 1 through 6 | $NO_x$ | -- | 47.13 |
| | | **CO** | -- | 39.20 |
| | | **VOC** | -- | 26.46 |
| | | **PM** | -- | 46.58 |
| | | $PM_{10}$ | -- | 46.58 |
| | | $PM_{2.5}$ | -- | 46.58 |
| | | $SO_2$ | -- | 10.63 |
| | | $H_2SO_4$ | -- | 4.88 |
| | | $(NH_4)_2SO_4$ | -- | 6.58 |
| | | $NH_3$ | -- | 39.28 |
| CT-LOV-1 | Combustion Turbine 1 Lube Oil Vent | **VOC** | 0.03 | 0.13 |
| | | **PM** | 0.03 | 0.13 |
| | | $PM_{10}$ | 0.03 | 0.13 |
| | | $PM_{2.5}$ | 0.03 | 0.13 |
| CT-LOV-2 | Combustion Turbine 2 Lube Oil Vent | **VOC** | 0.03 | 0.13 |
| | | **PM** | 0.03 | 0.13 |
| | | $PM_{10}$ | 0.03 | 0.13 |
| | | $PM_{2.5}$ | 0.03 | 0.13 |
| CT-LOV-3 | Combustion Turbine 3 Lube Oil Vent | **VOC** | 0.03 | 0.13 |
| | | **PM** | 0.03 | 0.13 |
| | | $PM_{10}$ | 0.03 | 0.13 |
| | | $PM_{2.5}$ | 0.03 | 0.13 |
| CT-LOV-4 | Combustion Turbine 4 Lube Oil Vent | **VOC** | 0.03 | 0.13 |
| | | **PM** | 0.03 | 0.13 |
| | | $PM_{10}$ | 0.03 | 0.13 |
| | | $PM_{2.5}$ | 0.03 | 0.13 |
| CT-LOV-5 | Combustion Turbine 5 Lube Oil Vent | **VOC** | 0.03 | 0.13 |
| | | **PM** | 0.03 | 0.13 |
| | | $PM_{10}$ | 0.03 | 0.13 |
| | | $PM_{2.5}$ | 0.03 | 0.13 |
| CT-LOV-6 | Combustion Turbine 6 Lube Oil Vent | **VOC** | 0.03 | 0.13 |
| | | **PM** | 0.03 | 0.13 |
| | | $PM_{10}$ | 0.03 | 0.13 |
| | | $PM_{2.5}$ | 0.03 | 0.13 |

| | | | | |
|---|---|---|---|---|
| GEN-LOV-1 | Generator 1 Lube Oil Vent | **VOC** | 0.03 | 0.13 |
| | | **PM** | 0.03 | 0.13 |
| | | **$PM_{10}$** | 0.03 | 0.13 |
| | | **$PM_{2.5}$** | 0.03 | 0.13 |
| GEN-LOV-2 | Generator 2 Lube Oil Vent | **VOC** | 0.03 | 0.13 |
| | | **PM** | 0.03 | 0.13 |
| | | **$PM_{10}$** | 0.03 | 0.13 |
| | | **$PM_{2.5}$** | 0.03 | 0.13 |
| GEN-LOV-3 | Generator 3 Lube Oil Vent | **VOC** | 0.03 | 0.13 |
| | | **PM** | 0.03 | 0.13 |
| | | **$PM_{10}$** | 0.03 | 0.13 |
| | | **$PM_{2.5}$** | 0.03 | 0.13 |
| GEN-LOV-4 | Generator 4 Lube Oil Vent | **VOC** | 0.03 | 0.13 |
| | | **PM** | 0.03 | 0.13 |
| | | **$PM_{10}$** | 0.03 | 0.13 |
| | | **$PM_{2.5}$** | 0.03 | 0.13 |
| GEN-LOV-5 | Generator 5 Lube Oil Vent | **VOC** | 0.03 | 0.13 |
| | | **PM** | 0.03 | 0.13 |
| | | **$PM_{10}$** | 0.03 | 0.13 |
| | | **$PM_{2.5}$** | 0.03 | 0.13 |
| GEN-LOV-6 | Generator 6 Lube Oil Vent | **VOC** | 0.03 | 0.13 |
| | | **PM** | 0.03 | 0.13 |
| | | **$PM_{10}$** | 0.03 | 0.13 |
| | | **$PM_{2.5}$** | 0.03 | 0.13 |
| HYD-OV-1 | Unit 1 Hydraulic Oil Vent | **VOC** | 0.03 | 0.13 |
| | | **PM** | 0.03 | 0.13 |
| | | **$PM_{10}$** | 0.03 | 0.13 |
| | | **$PM_{2.5}$** | 0.03 | 0.13 |
| HYD-OV-2 | Unit 2 Hydraulic Oil Vent | **VOC** | 0.03 | 0.13 |
| | | **PM** | 0.03 | 0.13 |
| | | **$PM_{10}$** | 0.03 | 0.13 |
| | | **$PM_{2.5}$** | 0.03 | 0.13 |
| HYD-OV-3 | Unit 3 Hydraulic Oil Vent | **VOC** | 0.03 | 0.13 |
| | | **PM** | 0.03 | 0.13 |
| | | **$PM_{10}$** | 0.03 | 0.13 |
| | | **$PM_{2.5}$** | 0.03 | 0.13 |
| | | **VOC** | 0.03 | 0.13 |

| | | | | |
|---|---|---|---|---|
| | | **PM** | 0.03 | 0.13 |
| | | **$PM_{10}$** | 0.03 | 0.13 |
| | | **$PM_{2.5}$** | 0.03 | 0.13 |
| HYD-OV-5 | Unit 5 Hydraulic Oil Vent | **VOC** | 0.03 | 0.13 |
| | | **PM** | 0.03 | 0.13 |
| | | **$PM_{10}$** | 0.03 | 0.13 |
| | | **$PM_{2.5}$** | 0.03 | 0.13 |
| HYD-OV-6 | Unit 6 Hydraulic Oil Vent | **VOC** | 0.03 | 0.13 |
| | | **PM** | 0.03 | 0.13 |
| | | **$PM_{10}$** | 0.03 | 0.13 |
| | | **$PM_{2.5}$** | 0.03 | 0.13 |
| VOC-FUG | VOC Fugitives | **VOC** | 0.53 | 2.34 |
| NH3-FUG | Ammonia Fugitives | **$NH_3$** | 4.07 | 17.81 |
| CT-MSS | ILE Turbine Maintenance | **VOC** | 0.85 | 0.03 |
| | | **PM** | 4.42 | 0.72 |
| | | **$PM_{10}$** | 4.42 | 0.71 |
| | | **$PM_{2.5}$** | 4.41 | 0.71 |
| | | **$NH_3$** | 0.02 | <0.01 |

VOC - volatile organic compounds
$NO_x$ - total oxides of nitrogen
CO - carbon monoxide
PM - total particulate matter, suspended in the atmosphere, including $PM_{10}$ and $PM_{2.5}$, as represented.
$PM_{10}$ - 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
$SO_2$ - sulfur dioxide
$H_2SO_4$ - sulfuric acid
$(NH_4)_2SO_4$ - ammonium sulfate
$NH_3$ - ammonia

Note: Fugitive emission rates are estimates and are enforceable through compliance with the standard permit representations.

Date: March 17, 2025