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June 23, 2025

[via STEERS]

Air Permits Initial Review Team (APIRT), MC 161
Texas Commission on Environmental Quality
12100 Park 35 Circle, Building C, Third Floor
Austin, Texas 78753

**RE: Notification of Replacement of Facilities under 30 TAC §106.264
Radial Stacking Conveyor
Luminant Mining Company LLC, CN603263773
Bremond Train Loading Facility, RN102710746**

Dear Sir or Madam:

Luminant Mining Company LLC (Luminant) hereby notifies the Texas Commission on Environmental Quality of the use of Permit by Rule, 30 Texas Administrative Code (TAC) §106.264, to authorize a facility replacement at the Bremond Train Loading Facility (BTLF) located near Bremond in Robertson County, Texas. BTLF is replacing the existing Radial Stacking Conveyor (facility identification number [FIN] F-RDLCNV, emission point number [EPN] E-RDLCNVF) with a similar facility.

The BTLF consists of a receiving hopper, feeder-breaker (a type of crusher), conveyors, an open storage pile, silos, and ancillary equipment. The existing Radial Stacking Conveyor at BTLF fell to the ground in April of 2024. The stacking conveyor and its support were significantly damaged. The existing Radial Stacking Conveyor is authorized by Air Quality Permit No. 155474. BTLF has determined that the replacement conveyor qualifies for Permit by Rule under 30 TAC §106.264 (Replacement of Facilities), as follows:

- 1) **“the replacement facility functions in the same or similar manner as the facility to be replaced;”**

The replacement Radial Stacking Conveyor (FIN F- RDLCNV) functions in the same manner as the existing one. The existing and replacement Radial Stacking Conveyor are conveyors that receive coal from the Unloading Conveyor and transfer it onto the Radial Stackout Pile (EPN E-RDLPILEF).

- 2) **“the emissions from the replacement facility are not more than nor have different characteristics than those from the facility to be replaced;”**

Emissions from the replacement Radial Stacking Conveyor will not be more than emissions from the existing one. The same throughput-based emission factor applies to both the existing and replacement Radial Stacking Conveyor, and the throughput capacity of the replacement Radial Stacking Conveyor is not more than the throughput capacity of the existing one. In addition, the existing and replacement Radial Stacking Conveyor are equipped with similar dust enclosures so that the Radial Stacking Conveyor will control coal dust emissions at least as effectively as the existing one does. Emissions from the replacement Radial Stacking Conveyor will not have different

characteristics because both the existing and replacement Radial Stacking Conveyor handle coal and emit coal dust.

- 3) **"the emissions from the replacement facility will not exceed 25 tons per year of any air contaminant;"**

Particulate matter (PM) emissions from replacement Radial Stacking Conveyor will comply with the maximum allowable emission rate in Permit No. 155474 of 1.25 tons PM per year, which is less than the Permit by Rule limit of 25 tons per year.

- 4) **"the physical location of the replacement facility is the same or immediately adjacent to the facility being replaced;"**

The replacement Radial Stacking Conveyor will be in the same location as the existing Radial Stacking Conveyor.

- 5) **"there will be no increase in capacity, production rate, or throughput as a result of the replacement;"**

The replacement Radial Stacking Conveyor will not have a greater capacity, production rate, or throughput than the existing one. Also, the replacement will not increase the capacity, production rate, or throughput of any facility that is upstream or downstream of the Radial Stacking Conveyor.

- 6) **"notwithstanding the provisions of paragraph (3) of this section, the emissions from the replacement facility will not contain any compounds (other than carbon monoxide, nitrogen oxide, or sulfur dioxide) listed or proposed to be listed as hazardous constituents in 40 Code of Federal Regulations 261, Appendix VIII;"**

The replacement Radial Stacking Conveyor will not emit any compound listed or proposed to be listed as hazardous constituents in 40 Code of Federal Regulations, Part 261, Appendix VIII.

- 7) **"notification of the replacement is provided to the executive director within ten days following installation of the replacement facility."**

Installation of the replacement Radial Stacking Conveyor commenced on June 23, 2025 and is not yet complete, so this notification is being provided within 10 days following installation, as required.

If you have any questions regarding the information presented in this letter, please contact Kimberly Hughes of my staff at (469) 405--8282.

Sincerely,



Renee Collins

Enclosure

cc: Mr. Jason Neumann, Air Program Manager, TCEQ Region 9, Waco

INTERNAL ONLY

E-mail: Harry Frier

Cody Combs

David van Dyke

Micah Hubert

Chris Caffey

Bryan Mast

Corey Pharris

Renee Collins

Scott Mills

Josh Whitaker

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Dustin Manthei

Zach Foster

Chase Phillips

Ryker Harger

**Replacements of Facilities
Air Permits by Rule (PBR) Checklist
Title 30 Texas Administrative Code § 106.264
Texas Commission on Environmental Quality**

Check the Appropriate Boxes and Fill in the Blanks:

(1)	<p>Will the replacement facility function in the same manner or in a similar manner as the facility to be replaced?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
(2)	<p>Will emissions from the replacement facility be less than or equal to and have the same characteristics as the emissions from the facility to be replaced?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
(3)	<p>Will the emissions from the replacement facility be \leq 25 tons per year (tpy) of any air contaminant?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
(4)	<p>List emissions from the new facility (do not include reductions from the facility to be replaced)(tpy):</p> <p>VOC:</p> <p>NO_x:</p> <p>CO:</p> <p>PM₁₀: 0.24 tpy (1.25 tpy PM)</p> <p>SO₂:</p> <p>Note: <i>Recommended calculation methods are provided above.</i></p>
(5)	<p>Will the physical location of the replacement facility be the same as or immediately adjacent to the facility being replaced?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
(6)	<p>Will there be an increase in capacity, production rate, or throughput as a result of the replacement?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
(7)	<p>Will the emissions from the replacement facility contain any compounds (other than carbon monoxide, nitrogen oxide, or sulfur dioxide) listed or proposed to be listed as hazardous constituents in Title 40 Code of Federal Regulations, Part 261 (40 CFR Part 261), Appendix VIII?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
(8)	<p>Is this notification being sent no later than ten days following the installation of the replacement facility?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

**Replacements of Facilities
Air Permits by Rule (PBR) Checklist
Title 30 Texas Administrative Code § 106.264
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Questions/Description and Response
<p>Is the replacement facility subject to:</p> <p>30 TAC Chapter 115</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Why or Why Not:</p> <p>The Radial Stacking Conveyor (E-RDLCNVF) has no VOC emissions associated with it and therefore is not subject to 30 TAC Chapter 115.</p>
<p>30 TAC Chapter 117</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Why or Why Not:</p> <p>The Radial Stacking Conveyor (E-RDLCNVF) has no NOx emissions associated with it and therefore is not subject to 30 TAC Chapter 115.</p>
<p>40 CFR Part 60, New Source Performance Standards</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Why or Why Not:</p> <p>The Bremond Train Loading Facility is subject to NSPS Subpart Y (Standards of Performance for Coal Preparation and Processing Plants).</p>
<p>40 CFR Part 61, National Emission Standards for Hazardous Air Pollutants</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Why or Why Not:</p> <p>The Radial Stack Conveyor has no HAP emissions associated with it and therefore is not subject to 40 CFR Part 61.</p>
<p>40 CFR Part 63, Maximum Available Control Technology</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Why or Why Not:</p> <p>The Radial Stack Conveyor has no HAP emissions associated with it and therefore is not subject to 40 CFR Part 63.</p>