

June 2, 2026

Jay C. Johnson

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Via Email

Danielle Gosselin
Director
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: Docket No. FD 36927, Denton & North Texas Railroad LLC – Construction
and Operation Exemption – Line of Railroad in Denton County, TX

Dear Danielle,

On behalf of our client Denton & North Texas Railroad LLC (DNT), I am writing to provide more information about construction emissions relevant to the letter we received from the Texas Commission of Environmental Quality (TCEQ).

As we explained in our May 18 letter, emissions from the operation of DNT's proposed rail line will fall far below the federal Clean Air Act *de minimis* emissions thresholds, including for (VOCs) and nitrogen oxides (NO_x). We can now confirm that emissions from construction of DNT's proposed rail line will also fall far below the *de minimis* thresholds.

DNT received the attached report from CSR Engineering, the engineering company that is assisting with construction of the proposed rail line. That report explains that emissions from all construction within the CPKC right-of-way—including NO_x and VOCs—will fall below the federal General Conformity *de minimis* thresholds. The report further explains that construction will take just three months and will involve 6,600 linear feet of new track. (That number includes the second siding shown in our earlier submissions; the length of the line from end to end remains 4,200 feet.)

Because these construction emissions will fall far below the conformity thresholds, no further analysis is warranted.

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Please don't hesitate to reach out if you have further questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jay C. Johnson", is positioned above the printed name.

Jay C. Johnson

June 1, 2026

Mr. Anthony Evett
VP Design & Construction
Patriot Rail Company
10752 Deerwood Park Blvd, Suite 300
Jacksonville, Florida 32256

Re: Construction Air Emissions Estimate
CPKC Rail Siding Project
Krum, Texas

Dear Mr. Evett,

This letter report summarizes anticipated air emissions associated with the construction of the proposed CPKC rail siding project near Krum in Denton County, Texas. The analysis was prepared to support coordination with the Surface Transportation Board (STB) Office of Environmental Analysis (OEA) regarding the project's pending environmental waiver request.

Project Description

The project involves constructing approximately 6,600 linear feet of new railroad siding track and six turnouts across approximately 4.4 acres in support of a future rail yard facility. Construction activities will include erosion control installation, vegetation clearing and grubbing, drainage improvements, grading, placement of sub-ballast and ballast, laying ties and rail, and general trackwork.

Construction is anticipated to occur over approximately three months, subject to the contractor's schedule, material availability, and weather conditions.

Methodology

Emissions were estimated for 13 categories of diesel-powered construction equipment anticipated for use during the project, including earthmoving equipment, haul trucks, rail construction equipment, and support vehicles. Equipment horsepower ratings were derived from a review of manufacturer specifications. Operating hours were estimated based on 8-hour workdays and the anticipated number of construction days for each equipment type, consistent with the project schedule.

Emission factors were obtained from publicly available EPA nonroad emissions resources and recent FRA environmental review documentation for comparable rail infrastructure projects. Emissions were calculated per the methodology described in EPA's General Conformity Training Modules, using a 59% load factor for construction equipment, as specified in EPA420-P-04-005.

Estimated emissions cover the following criteria pollutants:

- Carbon monoxide (CO)
- Particulate matter (PM₁₀ and PM_{2.5})

- Nitrogen oxides (NO_x)
- Sulfur dioxide (SO₂)
- Volatile organic compounds (VOCs)

Estimated emissions were compared to applicable federal General Conformity de minimis thresholds under the Clean Air Act. Denton County is located within the Dallas-Fort Worth ozone nonattainment area, currently classified as Serious under the 2015 eight-hour ozone standard, which results in lower de minimis thresholds of 70 tons/year for PM₁₀ and 50 tons/year for NO_x and VOCs. A detailed summary of equipment assumptions, emission factors, and calculated emissions is provided in Attachment A.

Estimated Construction Emissions

Table 1 presents estimated annualized construction emissions compared to applicable General Conformity de minimis thresholds.

Table 1: Estimated Annualized Construction Emissions		
Pollutant	Estimated Emissions (tons/year)	De Minimis Threshold (tons/year)
CO	2.63	100
PM _{10/2.5}	0.16	70
NO _x	11.44	50
SO ₂	0.005	100
VOCs	0.39	50

Emissions may vary throughout the construction period depending on equipment usage and construction sequencing, and are anticipated to be temporary and localized to the active construction area. Standard practices will be used to reduce emissions where practicable, including maintaining equipment in good operating condition and minimizing unnecessary idling.

Construction activities involving grading, earthmoving, material handling, and vehicle travel on unpaved surfaces have the potential to generate fugitive dust. Water application and standard best management practices are typically employed to minimize dust generation during active earthwork.

Conclusions

Construction emissions for the proposed project fall within federal General Conformity de minimis thresholds for all evaluated pollutants. Air quality impacts associated with construction are expected to be short-term and limited in geographic extent, consistent with rail infrastructure projects of similar scale.

Closing

Please feel free to reach out with any questions regarding this analysis or the supporting calculations.

Sincerely,



Katherine L. Clifton, P.G.
Environmental Services Manager
CSR Engineering

**Calculations for Estimated Air Emissions from Construction Equipment
CPKC Siding Tracks**

					Carbon Monoxide (CO)		Particulate Matter (PM _{10/2.5})		Nitrogen Oxides (NO _x)		Sulfur Dioxide (SO ₂)		Volatile Organic Compounds (VOCs)	
Equipment Description ¹	Equipment Horsepower ²	Number of Equipment	Days of Construction	Total Working Hours ³	Emission Factor (g/hp-hr) ⁴	Emissions (Tons/Year) ⁵	Emission Factor (g/hp-hr) ⁴	Emissions (Tons/Year) ⁵	Emission Factor (g/hp-hr) ⁴	Emissions (Tons/Year) ⁵	Emission Factor (g/hp-hr) ⁴	Emissions (Tons/Year) ⁵	Emission Factor (g/hp-hr) ⁴	Emissions (Tons/Year) ⁵
Excavator	175	1	10	80	2.495	0.023	0.150	0.001	10.866	0.099	0.004	4.0E-05	0.370	0.003
Bulldozer	215	2	30	480		0.167		0.010		0.729		3.0E-04		0.025
Articulated Dump Truck	550	3	20	480		0.428		0.026		1.866		7.6E-04		0.064
Backhoe	100	2	30	480		0.078		0.005		0.339		1.4E-04		0.012
Front End Loader	225	1	20	160		0.058		0.004		0.254		1.0E-04		0.009
Compacter/Roller	100	2	20	320		0.052		0.003		0.226		9.2E-05		0.008
Tamper	250	1	5	40		0.016		0.001		0.071		2.9E-05		0.002
Regulator	250	1	5	40		0.016		0.001		0.071		2.9E-05		0.002
Pickup Truck	500	3	45	1080		0.876		0.053		3.817		1.5E-03		0.130
Flatbed Truck	500	1	30	240		0.195		0.012		0.848		3.4E-04		0.029
On Road Dump Trucks	515	5	20	800		0.669		0.040		2.912		1.2E-03		0.099
Skid Steer	100	1	30	240		0.039		0.002		0.170		6.9E-05		0.006
Generator	25	1	30	240		0.010		0.001		0.042		1.7E-05		0.001
Total Emissions:					2.63		0.16		11.44		0.005		0.39	

1) All equipment is assumed to be diesel-fueled.

2) Average horsepower ratings were obtained from a review of various manufacturers' specifications.

3) Total working hours are based on number of equipment, days of construction, and 8-hour work days.

4) Emission factors representative of diesel-powered construction equipment were derived from publicly available EPA nonroad emissions resources and recent FRA environmental review documentation for comparable rail infrastructure projects

5) Emissions calculated using formulas from the USEPA's "General Conformity Training Modules: Appendix A Samples Emissions Calculations." Load factor of 59% used for construction equipment based on EPA420-P-04-005 Rev 2004