

Jon Niermann, *Chairman*
Bobby Janecka, *Commissioner*
Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 4, 2024

JON STEWART
HSE MANAGER
MOUNTAIN CREEK POWER LLC
2233A MOUNTAIN CREEK PARKWAY
DALLAS, TEXAS 75211
Via email

Subject: Notice of Intent to Use Discrete Emission Credits
Mountain Creek Power LLC
Mountain Creek Steam Electric Station
Customer Number: CN604782680
Regulated Entity Number: RN101559235
EBT Portfolio Number: P3695
Project Number: 419166

Dear Jon Stewart:

In response to your Notice of Intent to Use Discrete Emission Credits submitted on July 1, 2024, the Texas Commission on Environmental Quality (TCEQ) set-aside the following credits for compliance with 30 Texas Administrative Code (TAC) §117.1310(a)(1)(B) and (C) for utility boiler, emission point number (EPN) MT-S8. A Notice of Use of Discrete Emission Credits application must be submitted within 90 days after the end of the use period.

Pollutant	Use Period	Set Aside Certificate	Amount Set Aside (tons)	Retained Certificate	Amount Retained (tons)
NO _x -O	1/1/2025 - 12/31/2025	D3146	11.0	N/A	N/A

Additional information regarding this project and the site's portfolio is available online at https://www2.tceq.texas.gov/airperm/index.cfm?fuseaction=ebt_dpa.start. If you have questions concerning this project or the Emissions Banking and Trading (EBT) program, please contact Marie Mercado at Marie.Mercado@tceq.texas.gov, or write to the TCEQ, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

A handwritten signature in black ink, appearing to read "Samuel Short", followed by a long horizontal line.

Samuel Short, Deputy Director
Air Permits Division
Office of Air

cc: Manager, Air Pollution Control Program, City of Dallas Office of Environmental Quality, Dallas

Discrete Emission Reduction Credit (DERC) Intent to Use Technical Review

Project Number:	419166	Project Manager:	Marie Mercado
Customer Reference No.:	CN604782680	Company Name:	Mountain Creek Power LLC
Regulated Entity Reference No.:	RN101559235	Site Name:	Mountain Creek Steam Electric Station
Portfolio Number:	P3695	County:	Dallas

Project Overview

Review	Explanation
Application Submitted Date:	7/1/2024
Intent Amount and Certificate(s):	11.0 tons from Certificate Number D3146
Pollutant:	ozone season nitrogen oxides (NO _x -O)
Reason for Use:	Compliance with 30 Texas Administrative Code (TAC) §117.1310(a)(1)(B) and (C) for utility boiler, emission point number (EPN) MT-S8
Use period:	1/1/2025 - 12/31/2025
Retained Amount and Certificate(s):	N/A
Additional Information:	This site was operated in the Dallas County and Mountain Creek Power LLC (Mountain Creek) submitted the DERC Intent to Use application before the August 1st deadline in 30 TAC §101.376(d)(1)(B)(i). DERC use in Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, and Tarrant Counties is subject to the 17.0 tons per day (tpd) limit in §101.376(f)(2). The company requested 2.5 tpd of DERCs for the 2025 calendar year to account for any unplanned activity that may require the use of DERCs for system-wide compliance. The total number of DERCs requested for the 2025 calendar year from all applications, including this application, do not exceed the 17.0 tpd limit.

Calculation Methodology

Per §101.376(d)(2)(B), the amount of discrete emission credits needed to exceed regulatory requirement is calculated as follows.

$$DERCs\ need = (ELA) \times (EER - RER)$$

Where:

ELA = expected level of activity

EER = expected emission rate per unit activity

RER = regulated emission rate per unit activity

Per 30 TAC §117.1310(a)(1)(B)(i), compliance is demonstrated on a rolling 24-hour (hr) average basis during the months of March through October of each calendar year. Per §117.1310(a)(1)(B)(ii), compliance is demonstrated on a rolling 30-day average basis during the months of November, December, January, and February of each calendar year. Finally, per §117.1310(a)(1)(C), compliance is demonstrated on an annual average basis. There are two RERs, 0.033 pound per million British thermal units (lb/MMBtu) in §117.1310(a)(1)(B) and 0.50 lb per megawatt-hr (MW-hr) output in §117.1310(a)(1)(C)

§117.1310(a)(1)(B) Calculation:

$$DERCs\ needed = 148,896 \frac{MMBtu}{day\ (d)} \times (0.067 - 0.033) \frac{lb}{MMBtu} \times \frac{1\ ton}{2,000\ lbs} = 2.5\ tpd$$

§117.1310(a)(1)(C) Calculation:

$$DERCs\ needed = 14,160 \frac{MW}{d} \times (0.847 - 0.5) \frac{lb}{MW} \times \frac{1\ ton}{2,000\ lbs} = 2.5\ tpd$$

Mountain Creek estimated there would be approximately four exceedance days in the 2025 use period. Chapter 117 requires compliance with the regulated emission rate in either §117.1310(a)(1)(B) or (C); therefore, the company requested 11.0 tons for the use period, including a 10% environmental contribution of 1.0 ton required under §101.376(d)(2)(D). DERCs can only be used once. Therefore, once DERCs are used to comply with one of two regulations as the rule requires compliance with the standard in either (B) or (C), those DERCs are not available to be used again.

Conclusion

The Texas Commission on Environmental Quality (TCEQ) is approving the request to set aside 11.0 tons of NO_x-O DERCs from Certificate Number D3146 for compliance with during the use period of January 1, 2025, through December 31, 2025.

09/04/2024 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 419166 STATUS: C DISP CODE: _____
RECEIVED: 07/01/2024 PROJTYPE: BDIU ISSUED DT: _____
SUP-DISP DATE: 09/04/2024

STAFF ASSIGNED TO PROJECT:
MERCADO, MARIE

PROJECT NOTES:
.COMPLIANCE WITH 30 TAC §117.1310(A)(1)(B) AND (C)
[.Attachments](#) from Steers
[.Copy Of Record](#) from Steers

PROJECT TRANSACTIONS

COMPANY DATA
COMPANY NAME: MOUNTAIN CREEK POWER LLC
CUSTOMER REGISTRY ID: CN604782680

PORTFOLIO DATA
NUMBER: P3695 NAME: MOUTAIN CREEK POWER LLC - MNTN CREEK - RN101559235

SITE DATA
ACCOUNT: DB0252S
REG ENTITY ID: RN101559235
SITE NAME: MOUNTAIN CREEK STEAM ELECTRIC STATION
COUNTY: DALLAS NEAREST CITY: DALLAS
LOCATION: 2233-A MOUNTAIN CREEK PARKWAY

CONTACT DATA
NAME: JON STEWART TITLE: HSE MANAGER
ROLE: AAR
STREET: 2233A MOUNTAIN CREEK PARKWAY
CITY/STATE, ZIP: DALLAS, TX , 75211-
PHONE: 214-623-1011 -
EMAIL:
JONATHAN.STEWART@ETHOSENENERGY.COM

TRANSACTION DATA
TRANSACTION TYPE: DERC_INTEN
DATE ENTERED: 2024-07-01 00:00:00.0 DELETED DATE: EFFECTIVE YEAR:
CONTAMINATE: NOX_O TONS: 11.00 DOLLARS:
ALLOWANCE0 CERTIFICATE NO.: D3146 COUNTY : DALLAS

TRACKING ACTIVITES

PROJECT RECEIVED BY 07/01/2024 PROJECT SUBMITTED : 07/01/2024 TEAM LEAD REVIEW : 08/23/2024
PM :
SECTION MANAGER 08/28/2024
REVIEW :

Portfolio Detail

Portfolio Number: P3695
Portfolio Name: MOUTAIN CREEK POWER LLC - MNTN CREEK - RN101559235
Company Name: MOUNTAIN CREEK POWER LLC

Actual Allowances for Pollutant NOX

Balance/Year	2020	2021	2022	2023	2024	2025	2026
Penalty from last year	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Certified Allocation	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Allowances for Offsets	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Future Trade In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Future Trade Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Stream Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Stream Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Current Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Current Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Total Reported Emissions	0	0	0	0	0	0	0
Quantification Penalty	-0	-0	-0	-0	-0	-0	-0
Current Used for Compliance	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Vintage From Previous Year	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Vintage Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Vintage Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Vintage Used for Compliance	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
DERC Intent	0	0	0	0	0	0	0
DERC Use	0	0	0	0	0	0	0
ERC Converted to Allowances	0	0	0	0	0	0	0
 CURRENT ALLOWANCE BALANCE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
VINTAGE ALLOWANCE BALANCE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

Flexible Allowances for Pollutant NOX

Balance	2020	2021	2022	2023	2024	2025	2026
Flexible Allowance	0	0	0	0	0	0	0
Penalty	0	0	0	0	0	0	0
Associated Annual Emissions	-0	-0	-0	-0	-0	-0	-0
BALANCE	0	0	0	0	0	0	0

Sb7 Allowances for Pollutant NOX

Balance/Year	2020	2021	2022	2023	2024	2025	2026
Previous Year Deficit	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Allowances Remaining from Previous Year	<u>15928</u>	<u>17533</u>	<u>19128</u>	<u>20644</u>	<u>22117</u>	<u>0</u>	<u>0</u>
Allocation	<u>1803</u>	<u>1803</u>	<u>1803</u>	<u>1803</u>	<u>1803</u>	<u>1803</u>	<u>1803</u>
Current Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Current Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Stream Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Stream Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Total Reported Emissions	-198	-208	-287	-330	-0	-0	-0
Remaining Balance	<u>17533</u>	<u>19128</u>	<u>20644</u>	<u>22117</u>	<u>23920</u>	<u>1803</u>	<u>1803</u>

DERC >

Certificate Num	Cont Code	Avail Tons	Transaction Type	Inactive Date	Gen Start Date	Gen End Date	County	Parent Cert Num
D3144	NOX_N	20.50	DERC_BUY	12/30/3000	06/01/2002	05/30/2003	DALLAS	D2464
D3742	NOX_O	573.60	DERC_RET	12/30/3000	06/01/2002	05/30/2003	DALLAS	D3700
D3143	NOX_O	595.60	DERC_BUY	10/18/2023	06/01/2002	05/30/2003	DALLAS	D2937
D3700	NOX_O	584.60	DERC_INTEN	12/30/3000	06/01/2002	05/30/2003	DALLAS	D3143
D3148	NOX_O	11.00	DERC_INTEN	12/30/3000	06/01/2002	05/30/2003	DALLAS	D2751
D3146	NOX_O	11.00	DERC_RET	12/30/3000	06/01/2002	05/30/2003	DALLAS	D3093
D3145	NOX_O	11.00	DERC_BUY	05/03/2023	06/01/2002	05/30/2003	DALLAS	D2949
D3143	NOX_O	595.60	DERC_INTEN	10/18/2023	06/01/2002	05/30/2003	DALLAS	D2937
D3146	NOX_O	11.00	DERC_INTEN	12/30/3000	06/01/2002	05/30/2003	DALLAS	D3093
D3148	NOX_O	11.00	DERC_BUY	12/30/3000	06/01/2002	05/30/2003	DALLAS	D2751
D3700	NOX_O	584.60	DERC_RET	12/30/3000	06/01/2002	05/30/2003	DALLAS	D3143
D3145	NOX_O	11.00	DERC_INTEN	05/03/2023	06/01/2002	05/30/2003	DALLAS	D2949
D3145	NOX_O	11.00	DERC_RET	05/03/2023	06/01/2002	05/30/2003	DALLAS	D2949
D3146	NOX_O	11.00	DERC_BUY	12/30/3000	06/01/2002	05/30/2003	DALLAS	D3093
D3654	NOX_O	9.00	DERC_RET	12/30/3000	06/01/2002	05/30/2003	DALLAS	D3145
D3663	NOX_O	2.00	DERC_USE	05/03/2023	06/01/2002	05/30/2003	DALLAS	D3145

Confirm Records to Send to TCEQ

Portfolio Number:P3695
Data current as of:07/01/2024

Project Information

Project Number: 419166
Portfolio Number: P3695
Customer Name: MOUNTAIN CREEK POWER LLC
Customer Reference Number: CN604782680
Regulated Entity: MOUNTAIN CREEK STEAM ELECTRIC STATION
Regulated Entity Reference Number: RN101559235
Account Name: DB0252S

Certification and Submission

Certificate	Pollutant	End Date	Amount Available (tpy)	Amount to be Used (tpy)	Use Period Start Date	Use Period End Date	Reason for Use	Permit Number	Ratio	Compliance Year
D3146	NOX_O		11.00	11.00	01/01/2025	12/31/2025	30 TAC CHAPTER 117	NSR 45417		

Supporting Documentation

1 file(s) attached.
P3695 NOx Calcs_NOI for 2025 Control Period.pdf

Contact Information

Primary Contact Name: JON STEWART
Address: 2233A MOUNTAIN CREEK PARKWAY DALLAS, TX 75211
Phone: 214-623-1011
Email: JONATHAN.STEWART@ETHOSENENERGY.COM
Technical Contact Name: JON STEWART
Phone: 214-623-1011
Email: JONATHAN.STEWART@ETHOSENENERGY.COM

I certify that I have not violated any term in my TCEQ STEERS participation agreement and have no reason to believe that the confidentiality or use of my password has been compromised at any time. I understand that entering my password and pressing the "Confirm Submit" button constitutes an electronic signature legally equivalent to my written signature.

I certify that I am authorized to make this submission on behalf of the owners and operators of the site and facilities included in this submission. I certify that I have knowledge of the information in this submission and any attachments, and that, based on my knowledge and belief formed after reasonable inquiry, the information is true, accurate, and complete. I acknowledge that I have read and understand Texas Water Code (TWC) §§7.177-7.183, which define criminal offenses for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and TWC §7.187, pertaining to criminal penalties. Additionally, I understand that TWC §5.102 and Texas Health and Safety Code §382.002 authorize the TCEQ to carry out and enforce its rules and associated duties, including the duty to take enforcement actions if these rules are violated.

This document was signed by Jon Stewart.

Signature Hash: 099C9B82A4259551C2795A7DBDFBC33647D26B276DD29AF6251868DB339D90FD

The following is additional information contained in your Copy of Record:

Submission IP address: 72.190.85.97

Submission date and time: 07/01/2024

Submission STEERS Version: 6.78

Submission Confirmation Number: 17340

Submission Data Hash Code: CA680FF3E99328CC2DFD3EFA7147CFCA6936A0BE4EB5E324BB3F746870CBAEBF

Mountain Creek Power
 RN101559235
 Portfolio Number: P3695
 Unit 8 (EPN: MT-B8 / FIN: MT-S8)

148896 MMBtu/day (Max Daily Heat Input)
 14160 MW/day (Max Daily Output)
 121 Maximum Planned Operating Days (June 01 through September 30)

NOx Emissions Calculations

30 Texas Administrative Code (TAC) §117.1310(a)(1)(B)(i)													
Expected				Expected		Regulated Activity				Regulated Total		DERCS	
Activity	Units	EER	Units	Total	Units	Emissions	Units	RER	Units	Emissions	Units	Needed	Units
148896	MMBtu/d	0.067	lb/MMBtu		5 tons/d		148896 MMBtu/d	0.033	lb/MMBtu		2.5 tons/d		2.5 tons
Total DERCS (4 days):												10 tons	
§117.1310(a)(1)(B)(ii)													
Expected				Expected		Regulated Activity				Regulated Total		DERCS	
Activity	Units	EER	Units	Total	Units	Emissions	Units	RER	Units	Emissions	Units	Needed	Units
148896	MMBtu/d	0.067	lb/MMBtu		5 tons/d		148896 MMBtu/d	0.033	lb/MMBtu		2.5 tons/d		2.5 tons
Total DERCS (4 days):												10 tons	
§117.1310(a)(1)(C)													
Expected				Expected		Regulated Activity				Regulated Total		DERCS	
Activity	Units	EER	Units	Total	Units	Emissions	Units	RER	Units	Emissions	Units	Needed	Units
148896	MMBtu/d	0.08	lb/MMBtu		6 tons/d		14160 MW/d	0.5	lb/MW		3.5 tons/d		2.5 tons
14160	MW/d	0.847	lb/MW										
Total DERCS (4 days):												10 tons	
NSR Permit 45717													
Expected				Expected		Regulated Activity				Regulated Total		DERCS	
Activity	Units	EER	Units	Total	Units	Emissions	Units	RER	Units	Emissions	Units	Needed	Units
148896	MMBtu/d	0.042	lb/MMBtu		3.1 tons/d		148896 MMBtu/d	0.008	lb/MMBtu		0.6 tons/d		2.5 tons
							74 tpy		1223 lb/d -or-		0.6 tons/d		
Total DERCS (4 days):												10 tons	

From: [Marie Mercado](#)
To: ["JONATHAN.STEWART@ETHOSENERGY.COM"](mailto:JONATHAN.STEWART@ETHOSENERGY.COM)
Cc: joseph.vu@dallascityhall.com
Subject: TCEQ EBT Document - DERC Intent (EBT Project Number 419166) - Mountain Creek Steam Electric Station
Date: Wednesday, September 4, 2024 3:38:00 PM
Attachments: [419166 DERC Intent Letter.pdf](#)

Please see the attached Emissions Banking and Trading (EBT) document for project number 419166. If you have any questions, please see the contact information in the last paragraph of the attached letter.

Texas Commission on Environmental Quality
EBT Programs
ebt@tceq.texas.gov

Sign up to receive e-mail updates about EBT programs on the [TCEQ GovDelivery subscription page](#). Select *Emissions Banking and Trading (EBT) Program* under the *Air Quality* heading.

From: [Marie Mercado](#)
To: [EBTTL](#)
Subject: For Review and Approval by 9/3/2024: DERC Intent 419167 (Permit Allowable Exceedance Request)
Date: Wednesday, August 28, 2024 8:18:00 AM
Attachments: [419167 DERC Intent Technical Review.docx](#)
[419167 DERC Intent Letter.docx](#)
[419166 Project File.pdf](#)

Hi Melissa:

My apologies for the oversight. Please see the attached documents for your review and approval.

Thanks,
Marie

From: EBTTL <EBTTL@tceq.texas.gov>
Sent: Tuesday, August 27, 2024 4:54 PM
To: Marie Mercado <Marie.Mercado@tceq.texas.gov>
Subject: DERC Intent 419167 (Permit Allowable Exceedance Request)
Importance: High

Hi Marie,

Please see the minor edit on your letter. Also, please add the Portfolio Summary to your project file.

Thank you!
Melissa

From: Marie Mercado <Marie.Mercado@tceq.texas.gov>
Sent: Friday, August 23, 2024 3:28 PM
To: EBTTL <EBTTL@tceq.texas.gov>
Subject: For Review and Approval by 8/28/2024: DERC Intent 419167 (Permit Allowable Exceedance Request)

Hi Melissa:

Please see the attached documents for your review and approval for DERC Intent 419167. Since the company is requesting to use DERCs to comply with permit allowables, this project cannot be completed until we are able to verify that the site did not use DERCs during the 2024 control period. The 2024 DERC Use project is due by March 31, 2025. The company has been notified to submit the DERC Use project as soon as possible after December 31, 2024, but no later than March 31, 2025.

Thanks,
Marie

From: [APDDIR](#)
To: [Rebecca Partee](#); [APDDIR](#)
Cc: [PSSMGR](#); [EBTTL](#); [Marie Mercado](#)
Subject: RE: For Review and Approval by 9/3/2024: DERC Intent 419166
Date: Friday, August 30, 2024 3:46:25 PM

Approved

Samuel Short
Air Permits Division
Texas Commission on Environmental Quality
512 239-5363
samuel.short@tceq.texas.gov



How are we doing? Fill out our online customer satisfaction survey
at www.tceq.texas.gov/customersurvey

From: Rebecca Partee <rebecca.partee@tceq.texas.gov>
Sent: Friday, August 30, 2024 3:28 PM
To: APDDIR <APDDIR@tceq.texas.gov>
Cc: PSSMGR <PSSMGR@tceq.texas.gov>; EBTTL <EBTTL@tceq.texas.gov>; Marie Mercado <Marie.Mercado@tceq.texas.gov>
Subject: FW: For Review and Approval by 9/3/2024: DERC Intent 419166

Sam,

Please see the attached for your approval.

Thank you,
Rebecca

From: PSSMGR <PSSMGR@tceq.texas.gov>
Sent: Friday, August 30, 2024 7:42 AM
To: Rebecca Partee <rebecca.partee@tceq.texas.gov>
Cc: EBTTL <EBTTL@tceq.texas.gov>; Marie Mercado <Marie.Mercado@tceq.texas.gov>
Subject: FW: For Review and Approval by 9/3/2024: DERC Intent 419166

Please see the attached documents for DERC Intent to Use Project 419166.

From: EBTTL <EBTTL@tceq.texas.gov>
Sent: Wednesday, August 28, 2024 3:46 PM
To: PSSMGR <PSSMGR@tceq.texas.gov>

Cc: Marie Mercado <Marie.Mercado@tceq.texas.gov>

Subject: For Review and Approval by 9/3/2024: DERC Intent 419166

Hi Daniel,

Please see the attached documents for DERC Intent to Use Project 419166. Note that this is the first project that we are approving for intent to use of DFW NO_x DERCs for the year 2025. As discussed, it has been determined that the collective tons per day (tpd) for 2025 is 16.0 tpd. This is below the 17.0 tpd regulatory limit for DFW.

Let us know if you have any questions.

Thanks!

Melissa