

Brooke T. Paup, *Chairwoman*
Bobby Janecka, *Commissioner*
Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 2, 2025

RAYMOND DEYOE
ASSET MANAGER
FREEPORT POWER LIMITED
22819 TIMBERLAKE CREEK RD
TOMBALL, TEXAS 77377
Via email

Subject: MECT Annual Compliance Report
Freeport Power Limited
Oyster Creek Cogeneration Plant
Customer Number: CN600131361
Regulated Entity Number: RN100223122
EBT Portfolio Number: P1714
Project Number: 419725

Dear Raymond Deyoe:

The Texas Commission on Environmental Quality (TCEQ) has processed the 2024 MECT Annual Compliance Report submitted on March 21, 2025, for compliance with 30 Texas Administrative Code (TAC) §101.359. This processing does not constitute an approval of the emissions quantification methods or results submitted in the site's Annual Compliance Report. A summary of the site's compliance account (portfolio) for the control period is attached.

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 EBT program, please contact Natalie Namba at Natalie.Namba@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", with a long horizontal line extending to the right.

Samuel Short, Deputy Director
Air Permits Division
Office of Air

cc: Director, Environmental Health, Brazoria County Health Department, Angleton

Table 1. Compliance Account Summary.

2024 Control Period	Amount (tons)
Certified Allocation	469.7
Previous Year Deficit with 10% Penalty	0.0
Total Current Allowances Traded In	0.0
Total Current Allowances Traded Out	94.1
Vintage Allowances from Previous Year	10.2
Vintage Allowances Traded In	7.0
Vintage Allowances Traded Out	0.0
Total Reported Emissions	392.5
Quantification Penalty	0.0
Current Allowances Used for Compliance	375.6
Vintage Allowances Used for Compliance	16.9
Deficit	0.0
Vintage Allowances Expired	0.3
Current Allowances Remaining	0.0

2024 MECT Annual Compliance Report Technical Review

Project Number:	419725	Project Manager:	Natalie Namba
Customer Reference No.:	CN600131361	Company Name:	Freeport Power Limited
Regulated Entity Reference No.:	RN100223122	Site Name:	Oyster Creek Cogeneration Plant
Portfolio Number:	P1714	County:	Brazoria

Review Summary

Review Level:	<input type="checkbox"/> Basic <input checked="" type="checkbox"/> Audit
Source Type:	<input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Electric Generation Utility
Quantification Penalty:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Potential Deviation:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Was the company notified about insufficient allowances, penalties, or changes to the report?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A

General Review

Review	Yes/No	Explanation
Was the report submitted on or before March 31?	Yes	Date Submitted: 3/21/2025
Was the report certified (submitted) by the portfolio's registered Primary or Alternate Authorized Account Representative (AAR)?	Yes	Certified by: Raymond Deyoe (AAR) See Additional Notes
Are the company and site information consistent with Central Registry?	Yes	
Were any new EPNs reported or did any existing EPNs undergo a change in status (e.g., shutdown, removed, etc.)?	No	
Did the site's account for this control period have sufficient allowances to cover the emissions and any penalties assessed?	Yes	

Audit Emissions Review

Review	Yes/No	Explanation
Were appropriate protocol citations provided for the Level of Activity (LOA) and Emission Factor (EF) for each FIN?	Yes	
For units without CEMS/PEMS, were the LOA and EF for each FIN reported in the units of the applicable Chapter 117 emission specifications?	N/A	All facilities reported as having CEMS

Review	Yes/No	Explanation
Was the appropriate supporting documentation provided for each FIN? See the MECT Supporting Documentation Guidance.	Yes	
Have all relevant stack tests been reviewed to determine if the results are acceptable under 101.354(a)? Is the EF in the stack test the same value reported for this control period?	N/A	All facilities reported as having CEMS
Were the emission quantification calculations correct? See Annual Reports SOP for instructions on reviewing a representative sample for each FIN type.	Yes	
Were emissions from one or more FINs determined using alternate data under §101.354(b)?	No	

Additional Notes

The report was submitted through the State of Texas Environmental Electronic Reporting System (STEERS) and certified (signed) by Raymond Deyoe, who was not listed as a contact for Portfolio Number P1714. The company was contacted on March 26, 2025 to request an AAR or AAAR signature on the Copy of Record (COR). The company responded on March 27, 2025 informing the Project Manager that they have updated their contact information in STEERS. Raymond Deyoe is now listed as the AAR for P1714. Email correspondence can be found in this Project File.

PROJECT RECEIVED BY PM : 03/21/2025 PROJECT SUBMITTED : 03/21/2025

TR - DEFICIENCY CYCLE : 03/26/2025 03/27/2025

SECTION MANAGER REVIEW : 03/28/2025 TEAM LEAD REVIEW : 03/28/2025 AUDIT REPORT : 03/31/2025

Portfolio Detail

Portfolio Number: P1714
Portfolio Name: FREEPORT - OYSTER CREEK COGENERATION - RN100223122
Company Name: FREEPORT POWER LIMITED

Actual Allowances for Pollutant NOX

Balance/Year	2022	2023	2024	2025	2026	2027	2028
Penalty from last year	0	0	0	0	0	0	0
Certified Allocation	469.7	469.7	469.7	469.7	469.7	469.7	469.7
Allowances for Offsets	-0	-0	-0	-0	-0	-0	-0
Future Trade In	0	0	0	0	0	0	0
Future Trade Out	-0	-0	-0	-0	-0	-0	-0
Stream Traded In	0	0	0	0	0	0	0
Stream Traded Out	-94.1	-94.1	-94.1	-94.1	-94.1	-94.1	-94.1
Current Traded In	0	0	0	0	0	0	0
Current Traded Out	-0	-0	-0	-0	-0	-0	-0
Total Reported Emissions	-375.3	-365.4	0	0	0	0	0
Quantification Penalty	-0	-0	-0	-0	-0	-0	-0
Current Used for Compliance	-375.3	-365.4	-0	-0	-0	-0	-0
Vintage From Previous Year	24.9	0.3	10.2	0	0	0	0
Vintage Traded In	0	0	7	0	0	0	0
Vintage Traded Out	-15	-0	-0	-0	-0	-0	-0
Vintage Used for Compliance	-0	-0	-0	-0	-0	-0	-0
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	0.3	10.2	375.6	375.6	375.6	375.6	375.6
VINTAGE ALLOWANCE BALANCE	9.9	0.3	17.2	0	0	0	0

Flexible Allowances for Pollutant NOX

Balance	2022	2023	2024	2025	2026	2027	2028
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	2022	2023	2024	2025	2026	2027	2028
Previous Year Deficit	0	0	0	0	0	0	0
Allowances Remaining from Previous Year	0	0	0	0	0	0	0
Allocation	0	0	0	0	0	0	0
Current Traded In	0	0	0	0	0	0	0
Current Traded Out	-0	-0	-0	-0	-0	-0	-0
Stream Traded In	0	0	0	0	0	0	0
Stream Traded Out	-0	-0	-0	-0	-0	-0	-0
Total Reported Emissions	-0	-0	-0	-0	-0	-0	-0
Remaining Balance	0	0	0	0	0	0	0

Banking Cap and Trade

Portfolio Balance for P1714

Actual Allowances for NOX

Balance/Year	2022	2023	2024	2025	2026	2027	2028
Current Balance	0.30	10.20	0	375.60	375.60	375.60	375.60

Vintage Balances for NOX

Balance/Year	2022	2023	2024	2025	2026	2027	2028
Current Balance	9.90	0.30	0.30	0	0	0	0

Flex permits Allowances for NOX

Balance/Year	2022	2023	2024	2025	2026	2027	2028
Current Balance	0	0	0	0	0	0	0

Pending Projects

Proj_num	Xaction Type

Pseudocally Closed Projects

Proj_num	Xaction Type
419725	CAP_RPT
419725	CAP_VINT

Confirm Records to Send to TCEQ

Portfolio Number:P1714
Data current as of:03/21/2025

Portfolio Information

Portfolio Number: P1714
Portfolio Name: FREEPORT - OYSTER CREEK COGENERATION - RN100223122
Program: MECT
Project Number: 419725
Pollutant Code: NOX
Control Period: 2024

FIN:OC8P8GT81	Fin Name:GAS TURBINE GT81-1230			EPN:OC8-S81	CEMS/PEMS:Yes	
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported	
9821574.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)		155.32	
FIN:OC8P8GT82	Fin Name:GAS TURBINE GT82-1231			EPN:OC8-S82	CEMS/PEMS:Yes	
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported	
8186037.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)		125.95	
FIN:OC8P8GT83	Fin Name:GAS TURBINE GT83-1232			EPN:OC8-S83	CEMS/PEMS:Yes	
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported	
7126108.000000	117.340(a)(1)(B)	MMBTU	117.340(c),(f)		111.19	
					Total Tons	392.5

Contact Information

Primary Contact Name: JOHN LAMBERT
Address: 815 WALKER STREET, SUITE 1600 HOUSTON, TX 77002
Phone: 713-343-1502
Email: jlambert@tateswood.com
Technical Contact Name: JOHN LAMBERT
Phone: 713-343-1502
Email: jlambert@tateswood.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 Raymond Deyoe.
Signature Hash: 22F550921DC02F0277E2154B7343E6D7767D164B92A514B578E4D436345BBE9B

The following is additional information contained in your Copy of Record:
Submission IP address: 73.136.254.212
Submission date and time: 03/21/2025
Submission STEERS Version: 6.89
Submission Confirmation Number: 18427
Submission Data Hash Code: 8439A045BC5A8F422D2BF1CE2F98BE707A55DEDEFCD6FFB932A2E5DCECFA39F



**Form ECT-1 Support Documentation
Annual Compliance Report
(Title 30 Texas Administrative Code § 101.359)**

OC8P8GT81	2024 Annual Fuel Information		
	mscf	btu/scf (HHV)	basis for HHV value
Natural Gas Stream #1	7,799,294	1,020	site/supplier data
Natural Gas Stream #2	1,825,503	1,020	site/supplier data
Vent Gas Stream #1	6,240	686	analyzed data

OC8P8GT82	2024 Annual Fuel Information		
	mscf	btu/scf (HHV)	basis for HHV value
Natural Gas Stream #1	6,660,579	1,020	site/supplier data
Natural Gas Stream #2	1,209,068	1,020	site/supplier data
Vent Gas Stream #1	231,752	686	analyzed data

OC8P8GT83	2024 Annual Fuel Information		
	mscf	btu/scf (HHV)	basis for HHV value
Natural Gas Stream #1	5,949,955	1,020	site/supplier data
Natural Gas Stream #2	978,980	1,020	site/supplier data
Vent Gas Stream #1	85,406	686	analyzed data

Supporting Documentation for Continuous Emissions Monitoring Systems and Predictive Emissions Monitoring Systems

Mass Emissions Cap and Trade Program
Emissions Banking and Trading Programs
Texas Commission on Environmental Quality

General Information

EBT Portfolio Number: P	
Company Name:	
Site Name:	
Customer Reference Number: CN	
Regulated Entity Reference Number: RN	
MECT Control Period:	

Verification of Continuous Emissions Monitoring Systems (CEMS) or Predictive Emissions Monitoring Systems (PEMS) Data Used for Mass Emissions Cap and Trade (MECT) Program Compliance

Check the boxes to certify that each statement below is true.

For this control period, each CEMS or PEMS used to determine MECT emissions for the site is in compliance with the certification and quality assurance requirements in 30 Texas Administrative Code (TAC) §117.8100 or §117.8110 , as applicable. When applicable, appropriate substitute emission compliance data was used for all periods when the nitrogen oxides (NO _x) monitor was off-line.	<input type="checkbox"/>
Information is provided in attached Table 1 for each CEMS or PEMS with downtime that exceeded 5% of the total annual operating hours of the unit during this control period. Additional information is attached to this form to explain the excessive downtime and validate the reported emissions for each CEMS or PEMS that exceeded 5% downtime.	<input type="checkbox"/>

Authorized Account Representative (AAR) Signature

An original signature is not required below if this form is submitted as an attachment to the Annual Compliance Report through State of Texas Environmental Electronic Reporting System (STEERS). For all other methods of submission, a signature is required.

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 Texas Commission on Environmental Quality (TCEQ) to carry out and enforce its rules and associated duties, including the duty to take enforcement actions if these rules are violated. I consent to the release of my contact information, including email address, in connection with information regarding this account under the Public Information Act.

Signature:	
Date:	
Name:	
Title:	

Supporting Documentation for Continuous Emissions Monitoring Systems and Predictive Emissions Monitoring Systems

Mass Emissions Cap and Trade Program
Emissions Banking and Trading Programs
Texas Commission on Environmental Quality

Overview

This document must be used to verify the CEMS and PEMS data used for MECT Program compliance. This form must be submitted as supporting documentation for each unit for which CEMS or PEMS data is used to determine the annual emissions reported for the MECT Program. A single form may contain information on multiple units. This form should be submitted annually.

This document should be included with your MECT annual compliance report submission.

Under [Texas Government Code 559.003\(b\)](#), individuals are entitled to receive and review any information we collect by means of a form that they complete and file with the TCEQ in a paper or electronic format on the TCEQ website.

If you have questions on how to fill out this form or about the Mass Emissions Cap and Trade Program, please contact us at 512-239-1250.

Company Information

EBT Portfolio Number: Enter the TCEQ-assigned Emissions Banking and Trading (EBT) Portfolio Number (PXXXX). You can verify your portfolio number by searching the [TCEQ EBT Database](#).

Company Name: Enter the legal name of the company. The company name on this form should match the name in the [TCEQ Central Registry Database](#).

Site Name: Enter the legal name of site. The site name on this form should match the name in the [TCEQ Central Registry Database](#).

Customer Reference Number (CN): Enter the TCEQ-assigned CN (CNXXXXXXXXXX). If you do not have a CN, leave this space blank.

Regulated Entity Reference Number (RN): Enter the TCEQ-assigned RN (RNXXXXXXXXXX). If you do not have a RN, leave this space blank.

MECT Control Period: Enter the control period for which you are certifying the CEMS/PEMS information.

Verification of CEMS or PEMS Data Used for MECT Program Compliance

Check the first box to certify if for this control period:

- each CEMS or PEMS used to determine MECT emissions for the site complies with the applicable certification and quality assurance requirements in [30 TAC Chapter 117](#); and
- when applicable, appropriate substitute emission compliance data was used for any periods when the NO_x monitor was off-line.

Note that if valid CEMS/PEMS data is available, it must be used to determine emissions.

Check the second box to certify that information is provided in the attached [Table 1](#) for each CEMS/PEMS with downtime that exceeded 5% of the total annual operating hours of the unit during this control period. If you check this box, you must also submit additional information to explain the excessive downtime and validate the reported emissions for each CEMS/PEMS that exceeded 5% downtime.

**Supporting Documentation for Continuous Emissions Monitoring Systems
and Predictive Emissions Monitoring Systems**

Mass Emissions Cap and Trade Program
Emissions Banking and Trading Programs
Texas Commission on Environmental Quality

AAR Signature

The AAR registered for the EBT account (portfolio) must certify and date this form. An original signature is not required if this form is submitted as an attachment to the Annual Compliance Report through STEERS. If you have not registered an AAR for this EBT account (portfolio), please do so using the [STEERS website](#). See the [STEERS Guidance](#) for help.

From: [Ray Deyoe](#)
To: [Natalie Namba](#)
Cc: [Heather Caradine](#); [John Lambert](#)
Subject: RE: Action Required by 3/28/2025: Notice of Deficiency for Oyster Creek Cogeneration Plant's MECT Annual Report
Date: Thursday, March 27, 2025 9:35:18 AM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[419725 Copy of Record.pdf](#)

Natalie-

I have changed the record in this portfolio to become the "AAR Contact", which now matches the signature submitted for this portfolio:

Portfolio Detail

Portfolio Number: P1714
Customer Name: FREEPORT POWER LIMITED
Customer Reference Number: CN600131361
Regulated Entity Name: OYSTER CREEK COGENERATION PLANT
Regulated Entity Reference Number: RN100223122
Account Number: BL0378Q

Does anything else need to be done for this annual report submittal or are we now good-to-go?

Appreciate your patience and support.

Ray

Ray Deyoe
Sr VP – Business Development & Optimization
Ironclad Energy
cell (713) 824-6851
rdeyoe@ironclad-energy.com

From: John Lambert <jlambert@tateswood.com>
Sent: Wednesday, March 26, 2025 1:10 PM
To: Ray Deyoe <rdeyoe@ironclad-energy.com>
Cc: Heather Caradine <hcaradine@tateswood.com>
Subject: FW: Action Required by 3/28/2025: Notice of Deficiency for Oyster Creek Cogeneration Plant's MECT Annual Report

Ray,

I just received this email relating to Oyster Creek. Let me know if I need to do anything.

John

John G. Lambert | President | **Tateswood Energy Company, LLC** | 480 Wildwood Forest Drive, Suite 475
Spring, TX 77380 | Phone: 713-343-1502 | Cell: 713-569-4369 | jlambert@tateswood.com

From: Natalie Namba <Natalie.Namba@tceq.texas.gov>

Sent: Wednesday, March 26, 2025 1:03 PM

To: John Lambert <jlambert@tateswood.com>

Subject: Action Required by 3/28/2025: Notice of Deficiency for Oyster Creek Cogeneration Plant's MECT Annual Report

Dear John Lambert:

This e-mail is in response to the 2024 MECT Annual Compliance Report application submitted to the Texas Commission on Environmental Quality (TCEQ) on March 21, 2025 (EBT Project Number 419725).

The following information is required to proceed with the review of your project:

The person that certified your 2024 MECT Annual Report, Raymond Deyoe, is not registered as an Authorized Account Representative (AAR) for Portfolio Number P1714. An AAR is required to certify (sign) all EBT applications submitted for each portfolio.

1. Please have the AAR/Alternate AAR (AAAR) sign the attached Copy of Record and return it via email by **March 28, 2025**.
2. If necessary, update your company's AAR contact information through the [State of Texas Environmental Electronic Reporting System \(STEERS\)](#). See the [EBT STEERS guidance](#) for details on editing the AAR/AAAR.

Please feel free to contact me if there are any questions.

Sincerely,



Natalie Namba
Natural Resource Specialist II
Air Permits Division, Office of Air, TCEQ
(512) 239-2583
Natalie.Namba@tceq.texas.gov

How is our customer service? Please complete our online Customer Satisfaction Survey at <https://www.tceq.texas.gov/customersurvey>.

From: [Natalie Namba](#)
To: [Ray Devoe](#)
Cc: jodie@brazoria-county.com
Subject: TCEQ EBT Documents - MECT Annual Report - Oyster Creek Cogeneration Plant
Date: Wednesday, April 2, 2025 10:44:00 AM
Attachments: [419725 MECT Annual Report Letter.pdf](#)

Please see the attached EBT document(s) for Project Number **419725**. 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: [APDDIR](#)
To: [Rebecca Partee](#); [APDDIR](#)
Cc: [PSSMGR](#); [EBTTL](#); [Natalie Namba](#)
Subject: RE: For Review and Approval by 4/2/2025: Audit MECT Report 419725
Date: Wednesday, April 2, 2025 7:42:03 AM

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: Wednesday, April 2, 2025 7:16 AM
To: APDDIR <APDDIR@tceq.texas.gov>
Cc: PSSMGR <PSSMGR@tceq.texas.gov>; EBTTL <EBTTL@tceq.texas.gov>; Natalie Namba <Natalie.Namba@tceq.texas.gov>
Subject: FW: For Review and Approval by 4/2/2025: Audit MECT Report 419725

Sam,

Please see the attached for your approval.

Thank you,
Rebecca

From: PSSMGR <PSSMGR@tceq.texas.gov>
Sent: Monday, March 31, 2025 12:45 PM
To: Rebecca Partee <rebecca.partee@tceq.texas.gov>
Cc: EBTTL <EBTTL@tceq.texas.gov>; Natalie Namba <Natalie.Namba@tceq.texas.gov>
Subject: FW: For Review and Approval by 4/2/2025: Audit MECT Report 419725

Please find the attached documents for Audit MECT Report 419725.