

Homer City Generation, L.P.
1750 Power Plant Road
Homer City, PA 15748

07/31/2025

VIA Electronic Submittal – Email

David Balog
Environmental Engineer Manager
Pennsylvania Department of Environmental Protection
Northwest Regional Office
230 Chestnut Street
Meadville, PA 16335

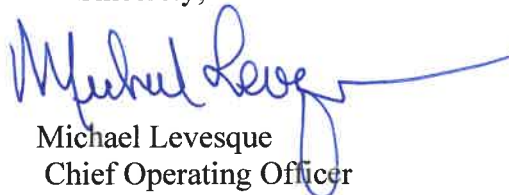
Re: Homer City Generating Station
Title V Permit No. 32-00055
Application for Emission Reduction Credits

Dear Mr. Balog:

Enclosed for the Department's review and approval is a revised Emission Reduction Credit (ERC) Registry Application for the Homer City Generating Station. This is submitted in response to the Department's July 7th letter requesting that the NOx ERCs be recalculated taking into account the facility-wide 30-day rolling average emission limit in addition to the unit daily mass limits as established in the Federal Implementation Plan issued by the U.S. EPA (87 Fed. Reg. 53381, August 31, 2022). As a result of this recalculation, the requested NOx ERCs has decreased from 2,436.3 to 2,031.8 tons. The VOC and PM2.5 ERCs remain unchanged from the previous ERC application. The emissions data used to calculate the ERCs are the same data that were submitted to the Air Emissions Inventory and are available in that database.

Please do not hesitate to call or email Gary Cline or me if you have any questions or require any additional information.

Sincerely,



Michael Levesque
Chief Operating Officer

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY**Emission Reduction Credit (ERC) Registry Application**

- This ERC Registry Application may be used by a major or non-major facility.
- ERCs may be created only if the ERC Registry Application is filed within one year of actual emission reductions.
- Read instructions for the ERC Registry Application prior to completing this form.

Section 1 - Identity and Location of Air Contamination Source**1A. Facility/Corporation Information**

Facility Name: HOMER CITY GENERATION LP/ CENTER TWP	Facility Address: 1750 Power Plant RD, Homer City PA 15748-8009
Telephone Number: (724) 479-6255	Fax Number:

1B. Facility Operator Information

(Complete if operator is different from company)

Operator's Name: Homer City Generation LP	Company Address: 1750 Power Plant RD, Homer City PA 15748-8009
Federal ID Number: 80-0833693	
Telephone Number: (724) 479-6255	Fax Number:

1C. Plant/Facility Information

Plant Name: Homer City Power Plant	Plant Address: 1750 Power Plant RD, Homer City PA 15748-8009
Federal ID Number: 80-0833693	
Telephone Number: (724) 479-6255	Fax Number:
Municipality/Township: Center Township	County: Indiana County

1D. Facility Type

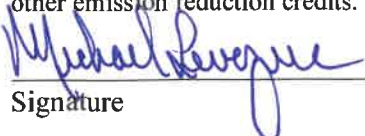
<input checked="" type="checkbox"/> Major Facility <input type="checkbox"/> Non-Major Facility	Permit No. (Title V): 32-00055
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1E. Contact Person for this Application

Name: Gary Cline	Mailing Address: 1750 Power Plant RD, Homer City PA 15748-8009
Title: Director, Compliance	
Telephone Number: (724) 388-4168	Fax Number:

1F. Certification Statement

I, Michael Levesque, certify under penalty of law as provided in 18 Pa. C.S.A. § 4904 and 35 P.S. § 4009(b)(2)) that I am authorized to make this Certification on behalf of the facility identified in this application and based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate and complete. I further certify that the emission reductions will be maintained as set forth in this application and that the emission reductions were not previously used in netting transactions, alternative emissions limitations, acid rain allowances or to generate other emission reduction credits.


Signature

Chief Operating Officer
Title

7/31/2025
Date

Section 2 - ERC-Generating Source Information

Provide the following information for the ERC-generating source

2A. Type of Source: Pulverized Bituminous Coal-fired Combustion Unit	2B. Plan Approval\Permit Number: 32-00055 Note: A permit is required for any source that is continuing to operate
2C. Manufacturer of Source: Foster Wheeler	2D. Model Number: Reheat OTU
2E. Date of Installation of the Source: 08/04/1969	2F. Air Cleaning Device: ACI, ESP, SCR, Dry SOx Scrubber, and Fabric Filters
2G. Source ID/Designation: 031	2H. Hourly Rated Capacity: 6,792 mmBtu/hr
2I. Annual Throughput: N/A	2J. Other Information: See Attachments

Section 3 - ERC Generation Techniques

Check appropriate box(es) to identify applicable ERC-generating technique(s)

- ☒ Shutdown of a source at an existing facility
- ☒ Shutdown of an existing facility
- ☒ Permanent curtailment of production or operation hours
- ☐ Improved control measures including improved control of fugitive emissions
- ☐ Installation of an air pollution control device beyond regulatory requirements
- ☐ Use of lower volatile organic compound (VOC) coatings than required
- ☐ New technology and/or materials (not required by applicable law)
- ☐ Process equipment modifications (not required by applicable law)
- ☐ Incidental emissions reduction of nonhazardous air pollutants
- ☐ Economic Incentive Program
- ☐ Other: _____

Section 4 - Intended use of ERCs

Check appropriate box(es) to specify intended use of ERCs

- ☒ Netting/Offsetting
- ☒ Banking/Trading/Selling Purposes

Section 5 - Emissions Reduction Initiation Date

Actual/Expected Date of Initiation of Emission Reduction: July 2023

Section 6 - Baseline Emission Rate Summary

Baseline emission rate (expressed in lbs/hr or tons/yr) is based on the lower of actual or allowable emissions calculated over two (2) calendar years immediately preceding the reduction unless otherwise approved by the Department.

Calendar Year	Hours of Operation	VOC		NOx		Other <u>PM2.5</u>	
		lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY
2021	3,625		4.8		1,467.6		86.1
2022	3,195		4.0		994.8		71.8
Average:	3,410		4.4		1,231.2		78.9
Average Actual Emissions corrected with applicable SIP limitations * *RACT/MACT/LAER/BACT, etc.			4.4		635.8 (calculated as a product of FIP limits and actual operations)		78.9
Revised Allowable Emissions after emission reductions:			0		0		0
Available ERCs:			4.4		635.8		78.9
Emission rates after reduction:							
VOC: 0 Lbs/Hour 0 Tons/Year NOx: 0 Lbs/Hour 0 Tons/Year Other: 0 Lbs/Hour 0 Tons/Year							

Do the above baseline emission estimates agree with emission statements submitted for PEDS/AIMS and any fees that have been paid, if applicable?

☒ Yes ☐ No If "No", submit request to amend emissions inventory along with this application.

Is the facility subject to any proposed maximum achievable control technology standards for hazardous air pollutants (MACT)? If yes, specify federal citation including Subpart.

☒ Yes Subpart: 40 CFR Table 2 To Subpart UUUUU of Part 63 ☐ No

Section 7 - Emission Quantification Methods

Check appropriate box(es) for method(s) used to determine the baseline emission rate. Attach copies of source tests, summaries of records, measurements or calculation methods used to estimate the baseline emissions.

- ☒ Performance test data on same unit
☐ Performance test data on similar unit
☒ Continuous emission monitoring data
☐ Equipment vendor emission data and guarantees
☐ Emission factors from technical reference or article
☐ AP-42 Emission Factors Table Number: _____
☐ EPA Test Data Document Document Number: _____
☐ Other: _____

Section 8 - Emission Characteristics

Provide the following information to determine the ambient impact of the emissions reduction

(a) Hours of Operation: Average of 3,410 hours per year during CYs 2021 and 2022	(b) Hourly Rate (specify unit): Maximum of 6,792 mmBtu/hr
(c) Stack Height (from ground level): 800 Feet	(d) Stack Inside Diameter: 24 feet
(e) Exhaust Volume: 2,318,346 ACFM	(f) Exhaust Temperature: 165°F
(g) Seasonal Period (months) Operated: ____N/A____ to ____	

Is the affected source in compliance with all applicable requirements?

Yes ☐ No If "No", attach a list of the violation(s), date(s) and location(s) specified in the Notice of Violation.

List all attachments provided to evaluate this ERC Registry Application.

Actual PM2.5, VOC, and NOx reported in the 2021 and 2022 AEI Reports and NOx FIP Emissions Allowable Spreadsheet

Section 2 - ERC-Generating Source Information

Provide the following information for the ERC-generating source

2A. Type of Source: Pulverized Bituminous Coal-fired Combustion Unit	2B. Plan Approval\Permit Number: 32-00055 Note: A permit is required for any source that is continuing to operate
2C. Manufacturer of Source: Foster Wheeler	2D. Model Number: Reheat OTU
2E. Date of Installation of the Source: 04/25/1970	2F. Air Cleaning Device ACI, ESP, SCR, Dry SO _x Scrubber, and Fabric Filters
2G. Source ID/Designation: 032	2H. Hourly Rated Capacity: 6,792 mmBtu/hr
2I. Annual Throughput: N/A	2J. Other Information:

Section 3 - ERC Generation Techniques

Check appropriate box(es) to identify applicable ERC-generating technique(s)

- ☒ Shutdown of a source at an existing facility
- ☒ Shutdown of an existing facility
- ☒ Permanent curtailment of production or operation hours
- ☐ Improved control measures including improved control of fugitive emissions
- ☐ Installation of an air pollution control device beyond regulatory requirements
- ☐ Use of lower volatile organic compound (VOC) coatings than required
- ☐ New technology and/or materials (not required by applicable law)
- ☐ Process equipment modifications (not required by applicable law)
- ☐ Incidental emissions reduction of nonhazardous air pollutants
- ☐ Economic Incentive Program
- ☐ Other: _____

Section 4 - Intended use of ERCs

Check appropriate box(es) to specify intended use of ERCs

- ☒ Netting/Offsetting
- ☒ Banking/Trading/Selling Purposes

Section 5 - Emissions Reduction Initiation Date

Actual/Expected Date of Initiation of Emission Reduction: July 2023

Section 6 - Baseline Emission Rate Summary

Baseline emission rate (expressed in lbs/hr or tons/yr) is based on the lower of actual or allowable emissions calculated over two (2) calendar years immediately preceding the reduction unless otherwise approved by the Department.

Calendar Year	Hours of Operation	VOC		NOx		Other: PM2.5	
		lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY
2021	3,212		4.5		734.5		68.6
2022	1,027		1.2		398.3		8.9
Average:	2,120		2.8		566.4		38.7
Average Actual Emissions corrected with applicable SIP limitations * *RACT/MACT/LAER/BACT, etc.			2.8		405.2 (calculated as a product of FIP limit and actual operations)		38.7
Revised Allowable Emissions after emission reductions:			0		0		0
Available ERCs:			2.8		405.2		38.7
Emission rates after reduction:							
VOC: 0 Lbs/Hour 0 Tons/Year NOx: 0 Lbs/Hour 0 Tons/Year Other: 0 Lbs/Hour 0 Tons/Year							

Do the above baseline emission estimates agree with emission statements submitted for PEDS/ AIMS and any fees that have been paid, if applicable?

☒ Yes ☐ No If "No", submit request to amend emissions inventory along with this application.

Is the facility subject to any proposed maximum achievable control technology standards for hazardous air pollutants (MACT)? If yes, specify federal citation including Subpart.

☒ Yes Subpart: Subpart: 40 CFR Table 2 To Subpart UUUUU of Part 63 ☐ No

Section 7 - Emission Quantification Methods

Check appropriate box(es) for method(s) used to determine the baseline emission rate. Attach copies of source tests, summaries of records, measurements or calculation methods used to estimate the baseline emissions.

- ☒ Performance test data on same unit
☐ Performance test data on similar unit
☒ Continuous emission monitoring data
☐ Equipment vendor emission data and guarantees
☐ Emission factors from technical reference or article
☐ AP-42 Emission Factors Table Number: _____
☐ EPA Test Data Document Document Number: _____
☐ Other: _____

Section 8 - Emission Characteristics

Provide the following information to determine the ambient impact of the emissions reduction

(a) Hours of Operation: Average of 2,120 hours per year during CYs 2021 and 2022	(b) Hourly Rate (specify unit): Maximum of 6,792 mmBtu/hr
(c) Stack Height (from ground level): 800 feet	(d) Stack Inside Diameter: 24 feet
(e) Exhaust Volume: 2,318,346 ACFM	(f) Exhaust Temperature: 165°F
(g) Seasonal Period (months) Operated: ____N/A____ to ____	

Is the affected source in compliance with all applicable requirements?

☒ Yes ☐ No If "No", attach a list of the violation(s), date(s) and location(s) specified in the Notice of Violation.

List all attachments provided to evaluate this ERC Registry Application.

Actual PM2.5, VOC, and NOx reported in the 2021 and 2022 AEI Reports and NOx FIP Emissions Allowable Spreadsheet

Section 2 - ERC-Generating Source Information

Provide the following information for the ERC-generating source

2A. Type of Source: Pulverized Coal-fired Combustion Unit	2B. Plan Approval\Permit Number: 32-00055 Note: A permit is required for any source that is continuing to operate
2C. Manufacturer of Source: Babcock and Wilcox	2D. Model Number: RB512
2E. Date of Installation of the Source: 12/29/1977	2F. Air Cleaning Device: ESP and Wet FGD
2G. Source ID/Designation: 033	2H. Hourly Rated Capacity: 7,260 mmBtu/hr
2I. Annual Throughput: N/A	2J. Other Information:

- ☒ Shutdown of a source at an existing facility
☒ Shutdown of an existing facility
☒ Permanent curtailment of production or operation hours
☐ Improved control measures including improved control of fugitive emissions
☐ Installation of an air pollution control device beyond regulatory requirements
☐ Use of lower volatile organic compound (VOC) coatings than required
☐ New technology and/or materials (not required by applicable law)
☐ Process equipment modifications (not required by applicable law)
☐ Incidental emissions reduction of nonhazardous air pollutants
☐ Economic Incentive Program
☐ Other: _____

Section 4 - Intended use of ERCs

Check appropriate box(es) to specify intended use of ERCs

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Section 5 -Emissions Reduction Initiation Date

Actual/Expected Date of Initiation of Emission Reduction: July 2023

Section 6 - Baseline Emission Rate Summary

Baseline emission rate (expressed in lbs/hr or tons/yr) is based on the lower of actual or allowable emissions calculated over two (2) calendar years immediately preceding the reduction unless otherwise approved by the Department.

Calendar Year	Hours of Operation	VOC		NOx		Other PM2.5	
		lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY
2021	4,847		3.9		942.1		97.2
2022	5,260		4.3		1,078.8		107.8
Average:	5,054		4.1		1,010.4		102.5

Average Actual Emissions corrected with applicable SIP limitations * *RACT/MACT/LAER/BACT, etc.		4.1		990.8 (calculated as a product of FIP limit and actual operations)		102.5
Revised Allowable Emissions after emission reductions:		0		0		0
Available ERCs:		4.1		990.8		102.5
Emission rates after reduction:						
VOC: 0 Lbs/Hour 0 Tons/Year NOx: 0 Lbs/Hour 0 Tons/Year Other: 0 Lbs/Hour 0 Tons/Year						

Do the above baseline emission estimates agree with emission statements submitted for PEDS/AIMS and any fees that have been paid, if applicable?

☒ Yes ☐ No If "No", submit request to amend emissions inventory along with this application.

Is the facility subject to any proposed maximum achievable control technology standards for hazardous air pollutants (MACT)? If yes, specify federal citation including Subpart.

☒ Yes Subpart: Subpart: 40 CFR Table 2 To Subpart UUUUU of Part 63 ☐ No

Section 7 - Emission Quantification Methods

Check appropriate box(es) for method(s) used to determine the baseline emission rate. Attach copies of source tests, summaries of records, measurements or calculation methods used to estimate the baseline emissions.

- ☒ Performance test data on same unit
☐ Performance test data on similar unit
☒ Continuous emission monitoring data
☐ Equipment vendor emission data and guarantees
☐ Emission factors from technical reference or article
☐ AP-42 Emission Factors Table Number: _____
☐ EPA Test Data Document Document Number: _____
☐ Other: _____

Section 8 - Emission Characteristics

Provide the following information to determine the ambient impact of the emissions reduction

(a) Hours of Operation: Average of 5,054 hours per year during CYs 2021 and 2022	(b) Hourly Rate (specify unit): Maximum of 7,260 mmBtu/hr
(c) Stack Height (from ground level): 854 feet	(d) Stack Inside Diameter: 27 feet
(e) Exhaust Volume: 2,156,799 ACFM	(f) Exhaust Temperature: 125°F
(g) Seasonal Period (months) Operated: ____N/A____ to ____	

Is the affected source in compliance with all applicable requirements?

☒ Yes ☐ No If "No", attach a list of the violation(s), date(s) and location(s) specified in the Notice of Violation.

List all attachments provided to evaluate this ERC Registry Application.

Actual PM2.5, VOC, and NOx reported in the 2021 and 2022 AEI Reports and NOx FIP Emissions Allowable Spreadsheet

OFFICIAL USE ONLY

Regional Office: _____ Date Received: _____
 Reviewed By: _____ Date Reviewed: _____
 Plan Approval Number: _____ Date Submitted: _____
 Previous Netting Transaction Date and Plan Approval Number: _____
 Comments: _____

Central Office NSR Section:
 Reviewed By: _____ Entry Date: _____
 Comments: _____