

Williams, Matthew

From: Wenrich, Sean
Sent: Friday, November 21, 2025 10:34 AM
To: Miliani, Michael (DEC); Michael Levesque; Jacqueline.Baker@ball.com
Cc: McNabb, Lori; Williams, Matthew; Trivedi, Viren; Zeisloft, Luke; Gary Cline; Yarrington, Steve M (DEC)
Subject: Interstate ERC Transfer Approval
Attachments: DEP ERC Transfer Letter to Ball.pdf; DEP ERC Transfer Letter to Homer City.pdf; DEP ERC Transfer Letter to NYSDEC.pdf; HOMER_CITY_20250905 (ERC-Analysis Summary).pdf

Please see the attached files. These letters approve the requested transfer of emission reduction credits generated at the Ball Walkkill Facility in New York State from Ball to Homer City. These letters supersede the letters sent on October 6, 2025. The trajectory analysis review is also attached.

Thank you,

Sean Wenrich, P.E. | Environmental Engineer Manager
Department of Environmental Protection | Bureau of Air Quality
400 Market Street | Hbg PA 17101
Phone: 717.772.3979 | Fax: 717.772.2303
www.pa.gov/agencies/dep

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November 21, 2025

TRANSMITTED VIA EMAIL TO: michael.miliani@dec.ny.gov

Mr. Michael Miliani, P.E.
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233

Re: Transfer of Volatile Organic Compounds (VOC) Emission Reduction Credits (ERCs) owned by Ball Corporation (“Ball”) to Homer City Generation, LP (“HCG”)

Dear Mr. Miliani,

This letter is in reference to your letter received on November 20, 2025, authorizing the Pennsylvania Department of Environmental Protection (DEP) to transfer a total of 46.08 tons per year (tpy) of VOC ERCs from Ball to HCG. These VOC ERCs are created from the shutdown of sources at the Ball Wallkill Facility located in Middletown, NY.

Facility	NYSDEC Permit ID	Pollutant	Tons Per Year	Expiration Date
Wallkill Facility	3-3352-00039	VOC	46.08	8/29/2033

Based on your November 20, 2025 letter and pursuant to the “Reciprocity Agreement” for interstate trading of ERCs between DEP and the NYSDEC, DEP is approving the interstate transfer of 46.08 tpy of VOC ERCs to the DEP’s ERC Registry from the New York ERC Registry on November 21, 2025, for use at HGC facility located in Center Township, Indiana County, Pennsylvania in accordance with the requirements of 25 Pa. Code Chapter 127 (relating to construction, modification, reactivation and operation of sources) and the ERC Registry system revised accordingly. Additionally, HCG submitted trajectory analysis that provides supplemental support for the transfer and use of these ERCs.

Under 25 Pa. Code § 127.206(f), the 46.08 tpy of VOC ERCs generated from the Ball Wallkill Facility will expire on August 29, 2033, if the credits are not used in a plan approval or operating permit prior to the expiration date. These ERCs may not be used as offsets at any other facility. In case the ERCs are not used as offsets at HGC, they will be returned to NYSDEC’s ERC Registry under HCG’s ownership.

If you have any questions or require additional information, please contact me at sewenrich@pa.gov or telephone 717-772-3979.

Sincerely,

Sean Wenrich

Sean Wenrich
Chief
New Source Review Section

cc: Ms. Jacqueline Baker, Ball Corp
Mr. Michael Levesque, Homer City Generation
Ms. Lori McNabb, Northwest Regional Office (DEP)
Mr. Steve Yarrington, New York State Department of Environmental Conservation



November 21, 2025

TRANSMITTED VIA EMAIL TO: mlevesque@homercityredevelopment.com

Michael Levesque
 Chief Operating Officer
 Homer City Redevelopment, LLC
 1750 Power Plant Road
 Homer City, PA 15748

Re: Transfer of Volatile Organic Compounds (VOC) Emission Reduction Credits (ERCs) owned by Ball Corporation (“Ball”) to Homer City Generation, LP (“HCG”)

Dear Mr. Levesque,

This letter is in reference to your letter received on July 17, 2025, requesting the Pennsylvania Department of Environmental Protection (DEP) to transfer a total of 46.08 tons per year (tpy) of VOC ERCs from Ball to HCG. These VOC ERCs are created from the shutdown of sources at the Ball Walkkill Facility located in Middletown, NY.

Sources	Pollutant	Tons Per Year	Expiration Date
Walkkill Facility	VOC	46.08	08/29/2033

Pursuant to the “Reciprocity Agreement” for interstate trading of ERCs between DEP and the NYDEC, DEP is approving the request to transfer 46.08 tpy of VOC ERCs to the DEP’s ERC Registry from the New York ERC Registry on November 21, 2025, for use at the HGC facility located in Center Township, Indiana County, Pennsylvania in accordance with the requirements of 25 Pa. Code Chapter 127 (relating to construction, modification, reactivation and operation of sources) and the ERC Registry system revised accordingly. Additionally, HCG submitted trajectory analysis that provides supplemental support for the transfer and use of these ERCs..

Under 25 Pa. Code § 127.206(f), the 46.08 tpy of VOC ERCs generated from the Ball Walkkill Facility will expire on August 29, 2033, if the credits are not used in a plan approval or operating permit prior to the expiration date. These ERCs may not be used as offsets at any other facility. In case the ERCs are not used as offsets at HGC, they will be returned to NYSDEC’s ERC Registry under HCG’s ownership.

If you have any questions or require additional information, please contact me at sewenrich@pa.gov or telephone 717-772-3979.

Sincerely,

Sean Wenrich

Sean Wenrich
Chief
New Source Review Section

cc: Ms. Jacqueline Baker, Ball Corp
Ms. Lori McNabb, Northwest Regional Office (DEP)
Mr. Steve Yarrington, New York State Department of Environmental Conservation



November 21, 2025

TRANSMITTED VIA EMAIL TO: Jacqueline.Baker@ball.com

Jacqui Baker
Senior Manager, Environmental Services (BPNCA)
Ball Corporation
9300 West 108th Circle
Westminster, CO 80021

Re: Transfer of Volatile Organic Compounds (VOC) Emission Reduction Credits (ERCs) owned by Ball Corporation (“Ball”) to Homer City Generation, LP (“HCG”)

Dear Ms. Baker,

This letter is in reference to your letter received on July 16, 2025, requesting the Pennsylvania Department of Environmental Protection (DEP) to transfer a total of 46.08 tons per year (tpy) of VOC ERCs from Ball to HCG. These VOC ERCs are created from the shutdown of sources at the Ball Walkkill Facility located in Middletown, NY.

Sources	Pollutant	Tons Per Year	Expiration Date
Walkkill Facility	VOC	46.08	08/29/2033

Pursuant to the “Reciprocity Agreement” for interstate trading of ERCs between DEP and the NYDEC, DEP is approving the request to transfer 46.08 tpy of VOC ERCs to the DEP’s ERC Registry from the New York ERC Registry on November 21, 2025, for use at HGC facility located in Center Township, Indiana County, Pennsylvania in accordance with the requirements of 25 Pa. Code Chapter 127 (relating to construction, modification, reactivation and operation of sources) and the ERC Registry system revised accordingly. Additionally, HCG submitted trajectory analysis that provides supplemental support for the transfer and use of these ERCs.

If you have any questions or require additional information, please contact me at sewenrich@pa.gov or telephone 717-772-3979.

Sincerely,

Sean Wenrich

Sean Wenrich
Chief
New Source Review Section

cc: Mr. Michael Levesque, Homer City Generation
Ms. Lori McNabb, Northwest Regional Office (DEP)
Mr. Steve Yarrington, New York State Department of Environmental Conservation



MEMO

TO Sean Wenrich, P.E. *SCW*
Environmental Engineer Manager
New Source Review Section
Division of Permits
Bureau of Air Quality

FROM Daniel J. Roble *DJR*
Air Quality Program Specialist
Air Quality Modeling and Risk Assessment Section
Division of Permits
Bureau of Air Quality

THROUGH Andrew W. Fleck *AWF*
Environmental Group Manager
Air Quality Modeling and Risk Assessment Section
Division of Permits
Bureau of Air Quality

DATE September 5, 2025

RE Trajectory Analysis to Support Emission Reduction Credits Use and Transfer
Homer City Generation, L.P.
Homer City Generation Project
Homer City Generating Station Site
Black Lick Township and Center Township, Indiana County

MESSAGE:

The Pennsylvania Department of Environmental Protection's (DEP) Air Quality Modeling and Risk Assessment Section has completed its technical review of the trajectory analysis submitted by Homer City Generation, L.P. (Homer City) to provide supplemental support for the use and transfer of emission reduction credits (ERC) for its proposed Homer City Generation Project. Homer City proposes to construct and operate an electric power generation facility at the Homer City Generating Station site in Black Lick Township and Center Township, Indiana County.

The DEP's technical review concludes that Homer City's trajectory analysis provides supplemental support for the use and transfer of ERCs, required for its proposed increased emissions of volatile organic compounds (VOC) associated with its project, from ERC-

generating facilities located in Pennsylvania and New York. The DEP's summary of Homer City's trajectory analysis is attached.

If you have any questions regarding Homer City's trajectory analysis, you may contact me (droble@pa.gov, 717.705.7689) or Andrew Fleck (afleck@pa.gov, 717.783.9243).

Attachment

cc: Viren Trivedi, BAQ/Permits
Lori McNabb, NWRO/Air Quality
Matthew Williams, NWRO/Air Quality/Facilities Permitting
David Balog, NWRO/Air Quality/New Source Review

DEP Summary of Trajectory Analysis to Support Emission Reduction Credits Use and Transfer
Homer City Generation, L.P.
Homer City Generation Project
Homer City Generating Station Site
Black Lick Township and Center Township, Indiana County
September 5, 2025

I. Background

The Pennsylvania Department of Environmental Protection (DEP) received a trajectory analysis on August 12, 2025, from Homer City Generation, L.P. (Homer City) to provide supplemental support for the use and transfer of emission reduction credits (ERC) for its proposed Homer City Generation Project, to construct and operate an electric power generation facility at the Homer City Generating Station site in Black Lick Township and Center Township, Indiana County.¹ The trajectory analysis was conducted by AECOM, on behalf of Homer City. The DEP received a revised trajectory analysis from Homer City on September 4, 2025.²

II. Regulatory Requirements

Homer City’s proposed project is subject to the New Source Review (NSR) regulations codified in Subchapter E of 25 Pa. Code Chapter 127. Homer City’s proposed project has the potential to emit at least 50 tons per year (tpy) of volatile organic compounds (VOC), which are precursors to ozone, and is subject to the NSR requirements for ERC use and transfer codified in 25 Pa. Code § 127.208.

Homer City’s calculated increased emissions of VOC associated with its project is 320.9 tpy and, accounting for an emission offset ratio codified in 25 Pa. Code § 127.210, Homer City is required to obtain 369.035 tpy of ERCs for its increased emissions of VOC. To this end, Homer City proposes the use and transfer of ERCs for its increased emissions of VOC from the ERC-generating facilities listed in Table 1:

Table 1: ERC-Generating Facilities and VOC ERCs

Facility	Location	VOC ERCs (tpy)
INDSPEC	Butler County (PA)	199.54
Mack Trucks Macungie	Lehigh County (PA)	81.00
Ball Metal Beverage	Orange County (NY)	46.08
Bemis Hazleton	Luzerne County (PA)	24.18
Huntley Power	Erie County (NY)	21.11
Homer City	Indiana County (PA)	11.30
Dunkirk Power	Chautauqua County (NY)	7.90
Cambria Cogen	Cambria County (PA)	6.70

¹ Letter (Evaluation of Emission Reduction Credit Use for Homer City Generation, 1750 Power Plant Rd, Homer City, PA) from Jeffrey Connors, AECOM to Sean Wenrich, DEP/BAQ/Permits/New Source Review. August 12, 2025.

² Letter (Evaluation of Emission Reduction Credit Use for Homer City Generation, 1750 Power Plant Rd, Homer City, PA) from Jeffrey Connors, AECOM to Sean Wenrich, DEP/BAQ/Permits/New Source Review. September 4, 2025.

At the request of the DEP, Homer City conducted a trajectory analysis to provide supplemental support for the use and transfer of ERCs for its increased emissions of VOC.

III. Trajectory Analysis

A. Model Selection

Homer City's trajectory analysis utilized the National Oceanic and Atmospheric Association's (NOAA) Hybrid Single-Particle Lagrangian Integrated Trajectory (HYSPLIT) model.³ The HYSPLIT model can compute simple air parcel trajectories and is extensively used in the atmospheric sciences community. A common application of the HYSPLIT model is a back-trajectory analysis to determine the origin of air masses and establish source-receptor relationships.

B. Model Options

The HYSPLIT model was executed separately for each month from March 2024 through October 2024, consistent with the U.S. Environmental Protection Agency's (EPA) defined ozone season for Pennsylvania,⁴ with the following configuration:

- Meteorology: North American Mesoscale (NAM) Forecast System, 12-kilometer resolution;
- Source Location: 40.51422 degrees North, -79.19401 degrees West;
- Archived meteorological file: Varies by month;
- Trajectory direction: Backward;
- Total run time: 48 hours;
- Number of days to calculate trajectory frequencies: 30 days;
- Trajectory frequency grid resolution: 1.0 x 1.0 degrees;
- Trajectory starting interval: six (6) hours; and
- Level 1 height: 500 meters above ground level.

IV. Confirmation of Model Results

The DEP confirmed Homer City's trajectory analysis results by executing the HYSPLIT model using a similar model configuration. The DEP also executed the HYSPLIT model with the following changes to the configuration: a level 1 height of 100 and 500 meters, each with a trajectory frequency grid resolution of 0.5 x 0.5 degrees and a trajectory starting interval of three (3) hours. The DEP confirmed that air parcels are transported from the areas of the ERC-generating sources in Pennsylvania and New York to the Homer City area during the ozone season months.

³ NOAA's Air Resources Laboratory website: <https://www.arl.noaa.gov/hysplit/>.

⁴ Ozone season defined in 40 CFR § 51.1100(n) and ozone monitoring season defined in 40 CFR Part 58, Appendix D, Section 4.1(i).

V. Conclusion

The DEP's technical review concludes that Homer City's trajectory analysis provides supplemental support for the use and transfer of ERCs, from the ERC-generating facilities located in Pennsylvania and New York, required for its proposed increased emissions of VOC associated with its project.