



September 17, 2025

**TRANSMITTED VIA EMAIL TO:** [rlack@anewclimate.com](mailto:rlack@anewclimate.com)

Randall Lack  
President- New Business  
Anew Environmental, LLC  
3200 Southwest Freeway, Suite 1310  
Houston, TX 77027

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

Dear Mr. Lack,

This letter is in reference to your letter received on May 13, 2025, requesting the Pennsylvania Department of Environmental Protection (DEP) to transfer a total of 29.01 tons per year (tpy) of VOC ERCs from Anew to HGC. 21.11 tpy of VOC ERCs were generated from the shutdown of sources at Huntley Power LLC facility located in Tonawanda, New York and 7.9 tpy of VOC ERCs were generated from the shutdown of the Dunkirk Power LLC facility located in Dunkirk, New York.

<b>Facility</b>	<b>NYSDEC Permit ID</b>	<b>Pollutant</b>	<b>Tons Per Year</b>	<b>Expiration Date</b>
Huntley Stam Generating Station	9-1464-00130	VOC	21.11	2/28/2026
Dunkirk Steam Generating Station	9-0603-00021	VOC	7.90	12/30/2025

Pursuant to the “Reciprocity Agreement” for interstate trading of ERCs between DEP and the NYSDEC, DEP is approving your request to transfer 29.01 tpy of VOC ERCs to the DEP’s ERC Registry from the New York ERC Registry on September 17, 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) 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](mailto: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