



October 6, 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 letters from Ball and HCG dated July 16 and 17, 2025, respectively, 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 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

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 October 6, 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