



September 17, 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 Anew Environmental, LLC (“Anew”) to Homer City Generation, LP (“HCG”)

Dear Mr. Levesque,

This letter is in reference to your letter dated July 8, 2025, authorizing 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.

Facility	NYSDEC Permit ID	Pollutant	Tons Per Year	Expiration Date
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

Based on your July 8, 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 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.

Under 25 Pa. Code § 127.206(f), the 21.11 tpy of VOC ERCs from the Huntley Power LLC facility and the 7.9 tpy of VOC ERCs from the Dunkirk Power LLC facility will expire on February 28, 2026, and December 30, 2025, respectively, if the credits are not used in a plan approval or operating permit by 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: Mr. Randall Lack, Anew
Mr. Michael Levesque, Homer City Generation
Ms. Lori McNabb, Northwest Regional Office (DEP)
Mr. Steve Yarrington, New York State Department of Environmental Conservation