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

#### 08/13/2024

#### VIA Electronic Submittal - OnBase

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:

I enclose for Department review and approval a revised Emission Reduction Credit (ERC) Registry Application for the Homer City Generating Station. The emissions reductions used to determine the NOx ERCs are based on actual emissions adjusted for the lower daily rates in the Federal Implementation Plan issued by the U.S. EPA for the Homer City Station (87 Fed. Reg. 53381, August 31, 2022). The emissions data used to calculate the ERCs are for the last two calendar years before the sources were permanently shut down and are presented in summary spreadsheets attached to the application. These emissions data 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 me if you have any questions or require any additional information.

Sincerely,

Shawn T. Lynch Senior Director



# 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:	Facility Address:			
HOMER CITY GENERATION LP/ CENTER TWP	1750 Power Plant RD, Homer City PA 15748-8009			
Telephone Number: (724) 479-6255	Fax Number:			
1B. Facility Operat	tor Information			
(Complete if operator is di	fferent from company)			
Operator's Name: Homer City Generation LP	Company Address:			
Federal ID Number: 80-0833693	1750 Power Plant RD, Homer City PA 15748-8009			
Telephone Number: (724) 479-6255	Fax Number:			
1C. Plant/Facility Information				
Plant Name: Homer City Power Plant	Plant Address:			
Federal ID Number: 80-0833693	1750 Power Plant RD, Homer City PA 15748-8009			
Telephone Number: (724) 479-6255	Fax Number:			
Municipality/Township: Center Township	County: Indiana County			
1D. Facility Type				
Major Facility Non-Major Facility	Permit No. (Title V): 32-00055			
1E. Contact Person for this Application				
Name: Shawn Lynch	Mailing Address:			
	1750 Power Plant RD, Homer City PA 15748-8009			
Title: Senior Director				
Telephone Number: (724) 479-6133	Fax Number:			
	<u> </u>			

#### 1F. Certification Statement

- I, Shawn Lynch, 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.

Simply

Senior Director Title

Date 8 (13/2024

### **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				
Combustion Citi	Note: A permit is required for any source that is continuing to operate				
2C. Manufacturer of Source:2D. Model Number: Reheat OTU					
Foster Wheeler					
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 Gen	neration Techniques				
Check appropriate box(es) to identify a	•				
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 devise beyond regu	ulatory requirements				
Use of lower volatile organic compound (VOC) coatings	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 applic					
☐ Incidental emissions reduction of nonhazardous air pollu					
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					
□ Danking/ Fraumg/ Selling Furposes					
Section 5 –Emissions Re	Section 5 – Emissions Reduction Initiation Date				
Actual/Expected Data of Initiation of Emission Reduction: I	why 2022				
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	VOC		NO	Ox	Other P	M2.5
	Operation	lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY
2021	3,625		4.8		1,462.2		86.1
2022	3,195		4.0		993.6		71.8
Average:	3,410		4.4		1,227.9		78.9
Average Actual Emi corrected with applications * *RACT/MACT/LAER/B.	cable SIP		4.4		942.7 (calcu as a produc FIP limit an actual oper hours)	et of ad	78.9
Revised Allowable Fafter emission reduct			0		0		0
Available ERCs:	tions.		4.4		942.7		78.9
Emission rates after	reduction:	1	l				
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							
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							
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 factor							
AP-42 Emission	Factors	Table Numb	er:				
	EPA Test Data Document						
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 requirement	ents?		
No. If "No. If "No. II also I also I do a minimum (a) data	-\		
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 App	lication.		
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

<ul> <li>2D. Model Number: Reheat OTU</li> <li>2F. Air Cleaning Device ACI, ESP, SCR, Dry SOx Scrubber, and Fabric Filters</li> <li>2H. Hourly Rated Capacity: 6,792 mmBtu/hr</li> <li>2J. Other Information:</li> </ul>								
Scrubber, and Fabric Filters  2H. Hourly Rated Capacity: 6,792 mmBtu/hr								
Scrubber, and Fabric Filters  2H. Hourly Rated Capacity: 6,792 mmBtu/hr								
2J. Other Information:								
Section 3 - ERC Generation Techniques								
applicable ERC-generating technique(s)								
<ul> <li>☑ Permanent curtailment of production or operation hours</li> <li>☑ Improved control measures including improved control of fugitive emissions</li> <li>☑ Installation of an air pollution control devise beyond regulatory requirements</li> </ul>								
					☐ 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)								
lutants								
nded use of ERCs								
Check appropriate box(es) to specify intended use of ERCs								
Reduction Initiation Date								

#### 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	VOC	N	Ox	Other: PM2.5
	Operation	lbs/hr TPY	lbs/hr	TPY	lbs/hr TPY
2021	3,212	4.5		732.3	68.6
2022	1,027	1.2		398.3	8.9
Average:	2,120	2.8		565.3	38.7
Average Actual Emicorrected with applications * *RACT/MACT/LAER/B	cable SIP	2.8		489.9 (calcula as a product FIP limit and actual operations)	of
Revised Allowable Emissions		0		0	0
after emission reduc Available ERCs:	ctions:	2.8		489.9	38.7
Emission rates after	reduction:				
			Tons/Year ission statements	submitted for PE	DS/AIMS and any fees that
(MACT)? If yes, sp	ct to any propo pecify federal c	ibmit request to amend sed maximum achieva itation including Subpa FR Table 2 To Subpart	ble control techno art.	ology standards f	nis application. or hazardous air pollutants No
Is the facility subject (MACT)? If yes, sp	ct to any propo pecify federal c	sed maximum achieva itation including Subpa	ble control techno art.	ology standards f	or hazardous air pollutants
Is the facility subject (MACT)? If yes, sp	ct to any propo pecify federal c	sed maximum achieva itation including Subpa	ble control technourt. UUUUUU of Part 6	ology standards f	or hazardous air pollutants
Is the facility subject (MACT)? If yes, sp  Yes Subpart:  Check appropriate	ct to any propo ecify federal c Subpart: 40 C box(es) for me	sed maximum achieva itation including Subpa FR Table 2 To Subpart Section 7 - Emissio	ble control technorurt.  UUUUU of Part 6  on Quantification ine the baseline e	ology standards for the standa	or hazardous air pollutants  No  ach copies of source tests,
Is the facility subject (MACT)? If yes, sp  Yes Subpart:  Check appropriate summaries of recor	ct to any propo pecify federal c Subpart: 40 C box(es) for me	sed maximum achieva itation including Subpart FR Table 2 To Subpart Section 7 - Emission thod(s) used to determinents or calculation met	ble control technorurt.  UUUUU of Part 6  on Quantification ine the baseline e	ology standards for the standa	or hazardous air pollutants  No  ach copies of source tests,
Is the facility subject (MACT)? If yes, sp  Yes Subpart:  Check appropriate summaries of recor	ct to any propo pecify federal c Subpart: 40 C box(es) for me rds, measurem	seed maximum achieva itation including Subpart FR Table 2 To Subpart Section 7 - Emission thod(s) used to determents or calculation met	ble control technorurt.  UUUUU of Part 6  on Quantification ine the baseline e	ology standards for the standard for the standards for the standar	or hazardous air pollutants  No  ach copies of source tests,
So the facility subject (MACT)? If yes, sp Subpart:  Check appropriate summaries of records  Performance te	box(es) for medas, measurements data on same	sed maximum achieva itation including Subpart FR Table 2 To Subpart Section 7 - Emission thod(s) used to determents or calculation metion	ble control technorurt.  UUUUU of Part 6  on Quantification ine the baseline e	ology standards for the standard for the standards for the standar	or hazardous air pollutants  No  ach copies of source tests,
So the facility subject (MACT)? If yes, sp Subpart:  Check appropriate summaries of records:  Performance te Performance te Continuous em	box(es) for meds, measurements data on same	sed maximum achieva itation including Subpart FR Table 2 To Subpart Section 7 - Emission thod(s) used to determents or calculation metion	ble control technorurt.  UUUUU of Part 6  on Quantification ine the baseline e	ology standards for the standard for the standards for the standar	or hazardous air pollutants  No  ach copies of source tests,
Is the facility subject (MACT)? If yes, sp  Yes Subpart:  Check appropriate summaries of record  Performance te  Continuous em  Equipment ver	box(es) for meds, measurements data on same	seed maximum achieva itation including Subpart FR Table 2 To Subpart Section 7 - Emission withod(s) used to determinents or calculation metion	ble control technorurt.  UUUUU of Part 6  on Quantification ine the baseline e	ology standards for the standard for the standards for the standar	or hazardous air pollutants  No  ach copies of source tests,
Is the facility subject (MACT)? If yes, sp  Yes Subpart:  Check appropriate summaries of recor  Performance te  Continuous em  Equipment ver	box(es) for meds, measurements data on same ast data on simples of the control of	seed maximum achieva itation including Subpart FR Table 2 To Subpart Section 7 - Emission thod(s) used to determinents or calculation metallar unit ring data data and guarantees	ble control technorist.  UUUUU of Part 6  on Quantification ine the baseline e hods used to estir	ology standards for the standard for the standards for the standar	or hazardous air pollutants  No  ach copies of source tests,
Is the facility subject (MACT)? If yes, sp   Yes Subpart:  Check appropriate summaries of recor  Performance te  Continuous em  Equipment ver	box(es) for med at a on same est data on	seed maximum achieva itation including Subpart FR Table 2 To Subpart Section 7 - Emission thod(s) used to determents or calculation metical unit filar unit fring data data and guarantees and reference or article	ble control technorit.  UUUUU of Part 6  on Quantification ine the baseline e hods used to estir	ology standards for the standard for the standards for the standar	or hazardous air pollutants  No  ach copies of source tests,

## **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:			
<ul> <li>Shutdown of a source at an existing facility</li> <li>Shutdown of an existing facility</li> <li>Permanent curtailment of production or operation hours</li> <li>Improved control measures including improved control of fugitive emissions</li> <li>Installation of an air pollution control devise beyond regulatory requirements</li> <li>Use of lower volatile organic compound (VOC) coatings than required</li> <li>New technology and/or materials (not required by applicable law)</li> <li>Process equipment modifications (not required by applicable law)</li> <li>Incidental emissions reduction of nonhazardous air pollutants</li> <li>Economic Incentive Program</li> <li>Other:</li> </ul>				
Section 4 - Intend	led use of ERCs			
Check appropriate box(es) to specify intended use of ERCs				
<ul><li></li></ul>				
Section 5 –Emissions Rec	duction Initiation Date			
Actual/Expected Date of Initiation of Emission Reduction: July 2013				

#### 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	VOC	NO.		Other PM	
2021	Operation	lbs/hr TPY	lbs/hr	TPY	lbs/hr	TPY
2021	4,847	3.9		940.8		97.2
2022	5,260	4.3		1,076.6		107.8
Average:	5,054	4.1		1,008.7		102.5
Average Actual Emis corrected with applical limitations * *RACT/MACT/LAER/BA	able SIP	4.1		1,003.7 (calculated a product of I limit and ac operating he	FIP tual	102.5
Revised Allowable E	missions after	0		0		0
emission reductions: Available ERCs:		4.1		1003.7		102.5
Emission rates after r	eduction:					
have been paid, if a  Yes No  Is the facility subject	pplicable?  o If "No", su  t to any propo	timates agree with emission bmit request to amend emused maximum achievable tation including Subpart.	issions invento	ory along with t	his applicat	ion.
Yes Subpart:	Subpart: 40 C	FR Table 2 To Subpart UU	UUU of Part 63	3	] No	
		Section 7 - Emission (	Quantification	Methods		
Check appropriate summaries of recor	box(es) for me ds, measureme	thod(s) used to determine ents or calculation method	the baseline er s used to estim	mission rate. At nate the baseline	tach copies e emissions.	of source tests,
<ul><li>✓ Performance te</li><li>✓ Performance te</li></ul>						
	ission monitor	ing data				
☐ Equipment ven	dor emission o	lata and guarantees				
Emission factor	s from technic	al reference or article				
AP-42 Emission		Table Number:				
☐ EPA Test Data		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 require Yes No If "No", attach a list of the violation(s),	ements?  date(s) and location(s) specified in the Notice of Violation.			
List all attachments provided to evaluate this ERC Registry Ap Actual PM2.5, VOC, and NOx reported in the 2021 and 2022 A Spreadsheet	•			
OFFICIAL U	USE ONLY			
Regional Office: Date Received: Date Reviewed By: Date Reviewed By: Date Reviewed Plan Approval Number: Date Submitted Previous Netting Transaction Date and Plan Approval Number: Comments:	ed:ed:			
Central Office NSR Section:  Reviewed By: Entry Date: _  Comments:				