THE WCM GROUP, INC.
110 S. Bender Ave.
Humble, TX 77338

December 10, 2019

Mr. Bachir Bouzid
Bureau of Operating Permits
New Jersey Department of Environmental Protection
Mail Code 401-02
401 East State Street, 2nd Floor
Trenton, NJ 08625-0027

UPS NUMBER
1Z07479R0191658666

REFERENCE: Application for Minor Modification to Update Hazardous Air Pollutants
Camden Plant Holding LLC; Camden
Camden County; New Jersey
Program Interest No. 51608; Permit Activity No. BOP170001

Dear Mr. Bouzid,

On behalf of Camden Plant Holding LLC, (Camden), The WCM Group, Inc. (WCM) is submitting an application for a Minor Modification to Air Pollution Control Operating Permit BOP170001 in accordance with N.J.A.C. 7:27-22.23 to incorporate into the operating permit Hazardous Air Pollutants (HAPS) for which the annual potential to emit (PTE) exceeds the reporting thresholds set forth in Table 2 of N.J.A.C. 7:27-17.9(b).

1.0 Background

Camden operates an electric generating facility at 570 Chelton Avenue, Camden, Camden County, New Jersey. The facility consists of one (1) General Electric (GE) Frame 7 EA combined cycle combustion turbine equipped with a supplementally fired heat recovery steam generator (HRSG). The combustion turbine has a nominal electrical output of 89 MW. The turbine and duct burner fire pipeline quality natural gas as the primary fuel. Ultra-low sulfur distillate (ULSD) oil is authorized to be fired in the combustion turbine as the back-up fuel. A selective catalyst reduction (SCR) and carbon monoxide (CO) catalyst are utilized to control nitrogen oxides (NO_X) and CO emissions respectively. The facility also utilizes one (1) 17.5 MMBtu/hr steam boiler to provide heat to the HRSG when the combustion turbine is not in service. The facility operates under Title V Operating Permit No. BOP170001.

2.0 Addition of Reportable HAPS

With this application, we are requesting the addition to the operating permit of HAPs for which the annual PTE exceeds the reporting thresholds set forth in Table 2 of N.J.A.C. 7:27-17.9(b). HAPs are being added for each significant source operation (i.e., emission unit) for which the PTE exceeds the applicable reporting threshold in accordance with N.J.A.C. 7:27-22.6(f)5i. Note that there will be no physical change in, or change in the method of operation of the existing source operations. Acetaldehyde, benzene, beryllium, cobalt, ethylbenzene, formaldehyde, lead, naphthalene, nickel, polycyclic organic matter (POM), and propylene oxide are being added to the operating permit due to recent lowering of the reporting thresholds. Emission estimates are provided in Attachment A.

Please update the following sections of the operating permit to reflect the addition of HAP emissions to the operating permit:

- Section A - Pollutant Emissions Summary; Table 1 and 3;
- Facility Specific Requirements – Emission Unit: U1, Operating Scenario: OS Summary;
- Facility Specific Requirements – Emission Unit: U1, Operating Scenario: OS1 CT firing NG;
- Facility Specific Requirements – Emission Unit: U1, Operating Scenario: OS2 CT firing ULSD;
- Facility Specific Requirements – Emission Unit: U1, Operating Scenario: OS4 CT and DB firing NG;
- Facility Specific Requirements – Emission Unit: U1, Operating Scenario: OS5 CT firing ULSD and DB Firing NG;
- Facility Specific Requirements – Emission Unit: U1, Operating Scenario: OS9 Auxiliary Boiler Firing Natural Gas; Base Load; and
- Facility Specific Requirements – Emission Unit: U1, Operating Scenario: OS10 Auxiliary Boiler Firing Ultra Low Sulfur Distillate (ULSD); Base Load.

The specific proposed changes to the operating permit are provided in Attachment B.

3.0 N.J.A.C. 7:27-22.23 Minor Modification

The proposed changes to the operating permit described in Section 2.0 above qualify as a minor modification as outlined in N.J.A.C. 7:27-22.23 since the changes do not violate an applicable requirement and do not constitute a significant modification pursuant to N.J.A.C. 7:27-22.24. The following section demonstrates that the criteria which require a significant modification pursuant to N.J.A.C. 7:27-22.24(b)(1)-(9) do not apply to the proposed changes.

1. A change which causes the facility to be subject to, or which would constitute a modification pursuant to, any of the following:

i. Emission offset requirements at N.J.A.C. 7:27-18.2(a) and (b);
ii. NSPS regulations at 40 CFR 60;
iii. NESHAPS regulations at 40 CFR 61 or 63;
iv. PSD regulations at 40 CFR 52; or
v. Federal visibility regulations promulgated pursuant to 42 USC 7491 or 7492;

The proposed changes will not cause the facility to be subject to any of the requirements or regulations listed above, or constitute a modification pursuant to any of the requirements or regulations listed above. Note that there will be no physical change in, or change in the method of operation of the combustion turbines.

2. Any significant change in existing Federally enforceable operating permit conditions related to changing the monitoring method from continuous emission monitoring to parametric monitoring or periodic stack testing;

The proposed changes will not result in a change to any current monitoring method.

3. A change which relaxes any Federally enforceable recordkeeping or reporting required by the operating permit;

The proposed changes will not relax any Federally enforceable recordkeeping or reporting requirement.

4. A change which relaxes any Federally enforceable provision of the compliance plan, including any lengthening of the time that a source operation is in noncompliance beyond the schedule contained in the compliance plan;

The proposed changes will not relax any Federally enforceable provision of the compliance plan.

5. A change which requires a case-by-case determination of an emission limitation or other specific standard contained in a State or Federal rule. This includes, for example, an application for a variance from a specific emission limit. This does not include determination of advances in the art of air pollution control;

The proposed changes will not require a case-by-case determination of an emission limitation or other specific standard contained in a State or Federal rule.

6. A relocation of a temporary facility to a site, other than is authorized in the operating permit, if air quality simulation modeling or risk assessment is required for the application pursuant to N.J.A.C. 7:27-22.8;

There will be no relocation of a temporary facility to the site.

7. A change which establishes or changes a permit condition for which there is no corresponding underlying applicable requirement, and which the facility has assumed to avoid an applicable requirement to which the facility would otherwise be subject. Such conditions include:
   i. A Federally enforceable emissions cap assumed to avoid classification as a major facility or to avoid becoming subject to:
      (1) Emission offset requirements pursuant to N.J.A.C. 7:27-18.2;
      (2) NSPS regulations at 40 CFR 60;
      (3) NESHAPS regulations at 40 CFR 61 or 63;
      (4) PSD regulations at 40 CFR 52; or
      (5) Federal visibility regulations promulgated pursuant to 42 USC 7491 or 7492; or
   ii. An alternative emissions limit for early reductions of HAPs approved pursuant to N.J.A.C. 7:27-22.34 and the regulations promulgated under 42 USC 7412(i)(5).

The proposed changes will not establish or change a permit condition for which there is no corresponding underlying applicable requirement, and which the facility has assumed to avoid an applicable requirement to which the facility would otherwise be subject.

8. Any incorporation into the operating permit of a new operating scenario if such an incorporation does not qualify as a seven-day-notice change pursuant to N.J.A.C. 7:27-22.22, or a minor modification pursuant to N.J.A.C. 7:27-22.23; or

The proposed changes will not result in any new operating scenarios in the operating permit.

9. Any incorporation into the operating permit of a new authorization of emissions trading, if such an incorporation does not qualify as a seven-day-notice change pursuant to N.J.A.C. 7:27-22, or a minor modification pursuant to N.J.A.C. 7:27-22.23.

HAP emissions are not subject to any emissions trading program.

This application constitutes a minor modification to the operating permit. The application has been prepared in Radius version 4.0.09 and uploaded to the NJDEP web portal. A hard copy of the Radius application is provided in Attachment C.

Should you have any questions regarding the information provided, please do not hesitate to contact me at (281) 446-7070.

Sincerely,

John S. Pandolph
Special Consultant, Technical Services

JSP/llb
ENCLOSURE

cc: M. Driscoll
B. Kingston
S. Chan, EPA Region 2

ATTACHMENT A

HAPS POTENTIAL TO EMIT CALCULATIONS

Camden Plant Holdings, LLC
HAP EMISSIONS CALCULATIONS FOR GE FRAME 7 COMBUSTION TURBINE, DUCT BURNER AND AUXILIARY BOILER

Pollutant	Emission Factors [1]				Turbine (lb/hr)		DB (lb/hr)	Auxiliary Boiler (lb/hr)		Turbine PTE		DB PTE		Aux Boiler PTE		Reporting Threshold (lb/yr)	Turbine Exceed Reporting Threshold (Yes/No)	Turbine/DB Exceed Reporting Threshold (Yes/No)	Aux Blr Exceed Reporting Threshold (Yes/No)
	Turbine (lb/MMBtu)		DB/Boilers (lb/MMscf)	Boilers (lb/Mgal) [2]															
	ULSD	NG	NG	ULSD	ULSD	NG	NG	ULSD	NG	Total Annual (lb/yr)	Total Annual (tpy)	Total Annual (lb/yr)	Total Annual (tpy)	Total Annual (lb/yr)	Total Annual (tpy)				
1, 3-Butadiene	1.60E-05	4.30E-07	0.00E+00	0.00E+00	0.0175	0.0005	0.0000	0.0000	0.0000	23.1799	0.0116	0.0000	0.0000	0.0000	0.0000	1.5	Yes	Yes	No
Acetaldehyde	0.00E+00	4.00E-05	0.00E+00	0.00E+00	0.0000	0.0458	0.0000	0.0000	0.0000	381.9240	0.1910	0.0000	0.0000	0.0000	0.0000	21	Yes	Yes	No
Acrolein[3]	0.00E+00	3.62E-06	0.00E+00	0.00E+00	0.0000	0.0041	0.0000	0.0000	0.0000	34.5641	0.0173	0.0000	0.0000	0.0000	0.0000	1	Yes	Yes	No
Arsenic	1.10E-05	0.00E+00	2.00E-04	5.60E-04	0.0120	0.0000	0.0000	7.37E-05	3.40E-06	13.1135	0.0066	0.3804	0.0002	0.0524	0.00003	0.01	Yes	Yes	Yes
Benzene	5.50E-05	1.20E-05	2.10E-03	2.14E-04	0.0600	0.0137	0.0005	2.82E-05	3.57E-05	180.1447	0.0901	3.9942	0.0020	0.2208	0.0001	6	Yes	Yes	No
Beryllium	3.10E-07	0.00E+00	1.20E-05	4.20E-04	0.0003	0.0000	0.0000	5.52E-05	2.04E-07	0.3696	0.0002	0.0228	0.0000	0.0256	0.0000	0.02	Yes	Yes	Yes
Cadmium	4.80E-06	0.00E+00	1.10E-03	4.20E-04	0.0052	0.0000	0.0002	5.52E-05	1.87E-05	5.7223	0.0029	2.0922	0.0010	0.1335	0.0001	0.01	Yes	Yes	Yes
Chromium	1.10E-05	0.00E+00	1.40E-03	4.20E-04	0.0120	0.0000	0.0003	5.52E-05	2.38E-05	13.1135	0.0066	2.6628	0.0013	0.1633	0.0001	1000	No	No	No
Chrysene	0.00E+00	0.00E+00	1.80E-06	2.38E-06	0.0000	0.0000	0.0000	3.13E-07	3.06E-08	0.0000	0.0000	0.0034	0.0000	0.0003	0.0000	2	No	No	No
Cobalt	0.00E+00	0.00E+00	8.40E-05	6.02E-03	0.0000	0.0000	1.83E-05	7.92E-04	1.43E-06	0.0000	0.0000	0.1598	0.0001	0.3579	0.0002	0.005	No	Yes	Yes
Dibenzo(a,h)anthracene	0.00E+00	0.00E+00	1.20E-06	1.67E-06	0.0000	0.0000	0.0000	2.20E-07	2.04E-08	0.0000	0.0000	0.0023	0.0000	0.0002	0.0000	0.04	No	No	No
Dichlorobenzene	0.00E+00	0.00E+00	1.20E-03	0.00E+00	0.0000	0.0000	0.0003	0.0000	2.04E-05	0.0000	0.0000	2.2824	0.0011	0.1191	0.0001	4	No	No	No
Ethylbenzene	0.00E+00	3.20E-05	0.00E+00	6.36E-05	0.0000	0.0366	0.0000	8.37E-06	0.0000	305.5392	0.1528	0.0000	0.0000	0.0037	0.0000	19	Yes	Yes	No
Formaldehyde[4]	2.80E-04	1.17E-05	7.50E-02	3.30E-02	0.3055	0.0134	0.0164	4.34E-03	1.27E-03	445.5107	0.2228	142.6500	0.0713	9.3579	0.0047	3.5	Yes	Yes	Yes
Hexane	0.00E+00	0.00E+00	1.80E+00	0.00E+00	0.0000	0.0000	0.3932	0.0000	3.06E-02	0.0000	0.0000	3423.6000	1.7118	178.5960	0.0893	2000	No	Yes	No
Lead[5]	9.22E-06	0.00E+00	0.00E+00	1.26E-03	0.0101	0.0000	0.0000	1.66E-04	0.0000	10.9915	0.0055	0.0000	0.0000	0.0732	0.0000	2	Yes	Yes	No
Manganese	7.90E-04	0.00E+00	3.80E-04	8.40E-04	0.8619	0.0000	0.0001	1.10E-04	6.46E-06	941.7871	0.4709	0.7228	0.0004	0.0865	0.0000	0.6	Yes	Yes	No
Mercury	1.20E-06	0.00E+00	2.60E-04	4.20E-04	0.0013	0.0000	0.0001	5.52E-05	4.42E-06	1.4306	0.0007	0.4945	0.0002	0.0502	0.0000	2	No	No	No
Naphthalene	3.50E-05	1.30E-06	6.10E-04	1.13E-03	0.0382	0.0015	0.0001	1.49E-04	1.04E-05	54.1373	0.0271	1.1602	0.0006	0.1261	0.0001	1.4	Yes	Yes	No
Nickel	4.60E-06	0.00E+00	2.10E-03	4.20E-04	0.0050	0.0000	0.0005	5.52E-05	3.57E-05	5.4838	0.0027	3.9942	0.0020	0.2328	0.0001	0.6	Yes	Yes	No
Polycyclic Organic Matter (POM)[6]	4.00E-05	2.20E-06	1.20E-06	3.30E-03	0.0436	0.0025	0.0000	4.34E-04	2.04E-08	68.6912	0.0343	0.0023	0.0000	0.1918	0.0001	2	Yes	Yes	No
Propylene Oxide	0.00E+00	2.90E-05	0.00E+00	0.00E+00	0.0000	0.0332	0.0000	0.0000	0.0000	276.8949	0.1384	0.0000	0.0000	0.0000	0.0000	12	Yes	Yes	No
Selenium	2.50E-05	0.00E+00	2.40E-05	2.10E-03	0.0273	0.0000	0.0000	2.76E-04	4.08E-07	29.8034	0.0149	0.0456	0.0000	0.1243	0.0001	925	No	No	No
Toluene	0.00E+00	1.30E-04	3.40E-03	6.20E-03	0.0000	0.1487	0.0007	8.16E-04	5.78E-05	1241.2530	0.6206	6.4668	0.0032	0.6974	0.0003	2000	No	No	No
Xylenes	0.00E+00	6.40E-05	0.00E+00	1.09E-04	0.0000	0.0732	0.0000	1.43E-05	0.0000	611.0784	0.3055	0.0000	0.0000	0.0063	0.0000	2000	No	No	No

[1] All Factors (except acrolein and formaldehyde for natural gas-fired turbines, and lead) from AP-42 Tables 1.3-9, 1.3-10, 1.4-3, 1.4-4, 3.1-3, 3.1.4, and 3.1-5. Emission factor is 0E+00 if no emission factor is listed in AP-42 and no alternative emission factor is found.

[2] AP-42 Table 1.3-10 Trace Elements converted from lb / 10^{12} Btu to lb / Mgal. Lb / Mgal = lb / 10^{12} Btu * 10^{6} Btu / MMBtu * 140 MMBtu / Mgal

[3] Acrolein emission factor for natural gas-fired turbines with controls from AP-42 Chapter 3 Backgound Document Table 3.4-1

[4] Formaldehyde emission factor for natural gas-fired turbines based on manufacturer data (GE Power Generation, July 24, 1995).

[5] Lead emission factors based on NJDEP 2016 Emission Statement Guidance Document, Appendix E.

[6] POM emission factor for boilers firing natural gas is from AP-42 Table 1.3-7 using Benzo(a)pryrene as a surrogate for POM.

PERMIT FUEL USE:

GT Annual ULSD Usage (MMgal/yr):	8.961	*From Permit*	1,192,136	*MMBtu/yr*	133036 *Btu/Gal*
GT Annual NG Usage (MMcf/yr) (max):	9,270	*From Permit*	9,548,100	*MMBtu/yr*	1030 *Btu/scf*
DB Annual NG Usage (MMcf/yr):	1,902	*From Permit*	1,959,060	*MMBtu/yr*	

Total HAPs (all HAPs)		
CT & DB HAPS	4.12	tpy
Aux Blr HAPS	0.10	tpy
Total HAPS	4.21	tpy

Total Reportable HAPs	
lb/yr	tpy
6,366.82	3.17

MAXIMUM HOURLY FIRING RATES:

GT Max ULSD Firing (MMBtu/hr):	1091	*From Permit*
GT Max NG Firing (MMBtu/hr):	1144	*From Permit*
DB Max NG Firing (MMBtu/hr):	225	*From Permit*
DB Max NG Firing (MMscf/hr):	0.218	
Aux Boiler Max ULSD Firing (MMBtu/hr):	17.5	*From Permit*
Aux Boiler Max ULSD Firing (Mgal/hr):	0.1315	
Aux Boiler Max ULSD Firing (Mgal/yr):	58.073	*From Permit*
Aux Boiler Max NG Firing (MMBtu/hr):	17.5	*From Permit*
Aux Boiler Max NG Firing (MMscf/hr):	0.0170	
Aux Boiler Max NG Firing (MMscf/yr):	99.22	*From Permit*
ULSD hrs per Turbine	1,093	Maximum hours per year based on turbine burning ULSD only
NG hrs per DB	8,707	Maximum hours per year based on duct burner burning NG only
NG hrs per Turbine only	8,346	Maximum hours per year based on turbine burning NG only

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ATTACHMENT B

PROPOSED CHANGES TO TITLE V OPERATING PERMIT

THE WCM GROUP, INC.
110 S. Bender Ave.
Humble, TX 77338

CHANGES TO SECTION A

Table 1: Total Emissions from all Significant Source Operations at the Facility.

Facility's Potential Emissions from all Significant Source Operations (tons per year)											
	Primary						Secondary				
Source Categories	VOC (total)	NOx	CO	SO_2	TSP (total)	Other* (total)	PM_{10} (total)	$PM_{2.5}$ (total)	Pb	HAPs* (total)	CO_{2e}
Emission Units Summary	26.3	169	36.8	4.59	34.1	70.6	88.1	N/A	0.005	3.17	N/A
Batch Process Summary	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Group Summary	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Total Emissions from Significant Source Operations	26.3	169	36.8	4.59	34.1	70.6	88.1	N/A	0.005	3.17	788,000

Table 3: Hazardous Air Pollutants (HAP) Emissions Summary[4]

HAP	TPY
1, 3-Butadiene	0.012
Acetaldehyde	0.191
Acrolein	0.017
Arsenic	0.007
Benzene	0.092
Beryllium	0.0002
Cadmium	0.004
Cobalt	0.0003
Ethylbenzene	0.153
Formaldehyde	0.299
Hexane	1.712
Lead	0.005
Manganese	0.471
Naphthalene	0.028
Nickel	0.005
POM	0.034
Propylene Oxide	0.138

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CHANGES TO FACILITY SPECIFIC REQUIREMENTS

Emission Item: U1 GE Frame 7 Turbine, Heat Recovery Steam Generator, and 17.5 MMBtu/hr Auxiliary Boiler

Operating Scenario: OS Summary

Add the following References:

Applicable Requirement: Acetaldehyde <= 0.191 tons/yr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Benzene <= 0.092 tons/yr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Beryllium <= 0.0002 tons/yr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Cobalt <= 0.0003 tons/yr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Ethylbenzene <= 0.153 tons/yr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Formaldehyde <= 0.299 tons/yr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Lead <= 0.005 tons/yr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Naphthalene <= 0.028 tons/yr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Nickel <= 0.005 tons/yr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: POM <= 0.034 tons/yr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Propylene oxide <= 0.138 tons/yr. [N.J.A.C. 7:27-22.16(a)]

Modify the following References:

Reference #32 Applicable Requirement: HAPs (Total) <= 3.17 tons/yr. [N.J.A.C. 7:27-22.16(a)]
Reference #33 Applicable Requirement: Acrolein <= 0.017 tons/yr. [N.J.A.C. 7:27-22.16(a)]
Reference #37 Applicable Requirement: Hexane <= 1.712 tons/yr. [N.J.A.C. 7:27-22.16(a)]
Reference #38 Applicable Requirement: Manganese <= 0.471 tons/yr. [N.J.A.C. 7:27-22.16(a)]

Emission Unit: U1, Operating Scenario: OS1 CT firing NG

Add the following References:

Applicable Requirement: Acetaldehyde <= 0.046 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Benzene <= 0.014 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Ethylbenzene <= 0.037 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Formaldehyde <= 0.013 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Naphthalene <= 0.001 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: POM <= 0.003 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Propylene oxide <= 0.033 lb/hr. [N.J.A.C. 7:27-22.16(a)]

Modify the following Reference:

Reference #36 Applicable Requirement: Acrolein <= 0.004 lb/hr. [N.J.A.C. 7:27-22.16(a)]

Emission Unit: U1, Operating Scenario: OS2 CT firing ULSD

Add the following References:

Applicable Requirement: Benzene <= 0.060 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Beryllium <= 0.00034 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Formaldehyde <= 0.305 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Lead <= 0.010 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Naphthalene <= 0.038 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Nickel <= 0.005 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: POM <= 0.044 lb/hr. [N.J.A.C. 7:27-22.16(a)]

Emission Unit: U1, Operating Scenario: OS4 CT and DB firing NG

Add the following References:

Applicable Requirement: Acetaldehyde <= 0.046 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Arsenic <= 0.00004 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Benzene <= 0.014 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Beryllium <= 0.000003 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Cobalt <= 0.000018 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Ethylbenzene <= 0.037 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Formaldehyde <= 0.030 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Naphthalene <= 0.0016 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Nickel <= 0.00046 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: POM <= 0.003 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Propylene oxide <= 0.033 lb/hr. [N.J.A.C. 7:27-22.16(a)]

Modify the following Reference:

Reference #38 Applicable Requirement: Acrolein <= 0.004 lb/hr. [N.J.A.C. 7:27-22.16(a)]

Emission Unit: U1, Operating Scenario: OS5 CT firing ULSD and DB Firing NG

Add the following References:

Applicable Requirement: Benzene <= 0.060 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Beryllium <= 0.00034 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Cobalt <= 0.000018 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Formaldehyde <= 0.322 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Lead <= 0.010 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Naphthalene <= 0.038 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Nickel <= 0.0055 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: POM <= 0.044 lb/hr. [N.J.A.C. 7:27-22.16(a)]

Emission Unit: U1, Operating Scenario: OS9 Auxiliary Boiler firing Natural Gas

Add the following References:

Applicable Requirement: Arsenic <= 0.000003 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Beryllium <= 0.0000002 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Cadmium <= 0.000019 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Cobalt <= 0.000001 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Formaldehyde <= 0.0013 lb/hr. [N.J.A.C. 7:27-22.16(a)

Emission Unit: U1, Operating Scenario: OS1 Auxiliary Boiler firing ULSD

Add the following References:

Applicable Requirement: Arsenic <= 0.000074 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Beryllium <= 0.000055 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Cadmium <= 0.000055 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Cobalt <= 0.000792 lb/hr. [N.J.A.C. 7:27-22.16(a)]
Applicable Requirement: Formaldehyde <= 0.00434 lb/hr. [N.J.A.C. 7:27-22.16(a)]

THE WCM GROUP, INC.
110 S. Bender Ave.
Humble, TX 77338

ATTACHMENT C

RADIUS APPLICATION

Camden Plant Holding, LLC (51608)

Date: 12/4/2019

New Jersey Department of Environmental Protection
Reason for Application

Permit Being Modified

Permit Class: BOP **Number:** 170001

Description of Modifications: Application for a Minor Modification to the Title V Operating Permit BOP170001 in accordance with N.J.A.C. 7:27-22.23 to incorporate into the operating permit Hazardous Air Pollutants (HAPS) for which the annual potential to emit (PTE) exceeds the reporting thresholds set forth in Table 2 of N.J.A.C. 7:27-17.9(b).

New Jersey Department of Environmental Protection
Facility Profile (General)

Facility Name (AIMS): Camden Plant Holding, LLC **Facility ID (AIMS):** 51608

Street Address: 570 CHELTON AVE
CAMDEN, NJ 08104

Mailing Address: 570 CHELTON AVE
CAMDEN, NJ 08104

State Plane Coordinates:

X-Coordinate:	318,230
Y-Coordinate:	395,266
Units:	Feet
Datum:	Unknown
Source Org.:	Other/Unknown
Source Type:	Hard Copy Map

County: Camden

Location Description: Plant that produces steam and electricity with a combined-cycle gas turbine

Industry:

Primary SIC:	
Secondary SIC:	
NAICS:	221112

New Jersey Department of Environmental Protection
Facility Profile (General)

Contact Type: Air Permit Information Contact

Organization: Camden Plant Holding, LLC
Org. Type: LLC
Name: Mark Driscoll
NJ EIN: 68742600002
Title: Environmental Director
Phone: (848) 448-4852 x
Fax: (856) 963-2411 x
Other: ( ) - x
Type:
Email: Mark.Driscoll@TalenEnergy.com
Mailing Address: 570 Chelton Ave
Camden, NJ 08104

Contact Type: Consultant

Organization: The WCM Group, Inc.
Org. Type: Corporation
Name: Kerry Higgins
NJ EIN: 68742600002
Title: Sr. Director, Technical Services
Phone: (281) 446-7070 x
Fax: (281) 446-3348 x
Other: ( ) - x
Type:
Email: khiggins@wcmgroup.com
Mailing Address: P.O. Box 3247
Humble, TX 77347-3247

Contact Type: Emission Statements

Organization: Camden Plant Holding, LLC
Org. Type: LLC
Name: Mark Driscoll
NJ EIN: 68742600002
Title: Environmental Director
Phone: (848) 448-4852 x
Fax: (856) 963-2411 x
Other: ( ) - x
Type:
Email: Mark.Driscoll@TalenEnergy.com
Mailing Address: 570 Chelton Ave
Camden, NJ 08104

New Jersey Department of Environmental Protection
Facility Profile (General)

Contact Type: Environmental Officer

Organization: Camden Plant Holding, LLC
Org. Type: LLC
Name: Mark Driscoll
NJ EIN: 68742600002
Title: Environmental Director
Phone: (848) 448-4852 x
Fax: (856) 963-2411 x
Other: ( ) - x
Type:
Email: Mark.Driscoll@TalenEnergy.com
Mailing Address: 570 Chelton Ave
Camden, NJ 08104

Contact Type: Fees/Billing Contact

Organization: Camden Plant Holding, LLC
Org. Type: LLC
Name: Brian Kingston
NJ EIN: 68742600002
Title: Facility Manager
Phone: (856) 338-1000 x
Fax: (856) 963-2411 x
Other: ( ) - x
Type:
Email: Brian.Kingston@TalenEnergy.com
Mailing Address: 570 Chelton Ave
Camden, NJ 08104

Contact Type: On-Site Manager

Organization: Camden Plant Holding, LLC
Org. Type: LLC
Name: Brian Kingston
NJ EIN: 68742600002
Title: Facility Manager
Phone: (856) 338-1000 x
Fax: (856) 963-2411 x
Other: ( ) - x
Type:
Email: Brian.Kingston@TalenEnergy.com
Mailing Address: 570 Chelton Ave
Camden, NJ 08104

New Jersey Department of Environmental Protection
Facility Profile (General)

Contact Type: Operator

Organization: Camden Plant Holding, LLC
Org. Type: LLC
Name: Brian Kingston
NJ EIN: 68742600002
Title: Facility Manager
Phone: (856) 338-1000 x
Fax: (856) 963-2411 x
Other: ( ) - x
Type:
Email: Brian.Kingston@TalenEnergy.com
Mailing Address: 570 Chelton Ave
Camden, NJ 08104

Contact Type: Owner (Current Primary)

Organization: Camden Plant Holding, LLC
Org. Type: LLC
Name: Scott Blair
NJ EIN: 68742600002
Title: Vice President
Phone: (410) 787-5017 x
Fax: ( ) - x
Other: (410) 917-6068 x
Type: Mobile
Email: Scott.Blair@TalenEnergy.com
Mailing Address: 1005 Brandon Shores Road
Baltimore, MD 21226

Contact Type: Responsible Official

Organization: Camden Plant Holding, LLC
Org. Type: LLC
Name: Brian Kingston
NJ EIN: 68742600002
Title: Facility Manager
Phone: (856) 338-1000 x
Fax: (856) 963-2411 x
Other: ( ) - x
Type:
Email: Brian.Kingston@TalenEnergy.com
Mailing Address: 570 Chelton Ave
Camden, NJ 08104

Camden Plant Holding, LLC (51608) Date: 12/4/2019

New Jersey Department of Environmental Protection
Facility Profile (Permitting)

1. Is this facility classified as a small business by the USEPA?	No
2. Is this facility subject to N.J.A.C. 7:27-22?	Yes
3. Are you voluntarily subjecting this facility to the requirements of Subchapter 22?	No
4. Has a copy of this application been sent to the USEPA?	Yes
5. If not, has the EPA waived the requirement?	
6. Are you claiming any portion of this application to be confidential?	No
7. Is the facility an existing major facility?	Yes
8. Have you submitted a netting analysis?	No
9. Are emissions of any pollutant above the SOTA threshold?	No
10. Have you submitted a SOTA analysis?	No
11. If you answered "Yes" to Question 9 and "No" to Question 10, explain why a SOTA analysis was not required	
12. Have you provided, or are you planning to provide air contaminant modeling?	No