



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

November 13, 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

VIA E-MAIL

REFERENCE Application for Minor Modification to include RGGI Requirements
Newark Bay Cogeneration Partnership, L.P.; Newark
Essex County; New Jersey
Program Interest No. 07617; Permit Activity No. BOP160001

Dear Mr. Bouzid:

On behalf of Newark Bay Cogeneration Partnership, L.P., (Newark Bay), The WCM Group, Inc. (WCM) is submitting an application for a Minor Modification to Air Pollution Control Operating Permit BOP160001 in accordance with N.J.A.C. 7:27-22.23 to incorporate those requirements to conform to New Jersey re-entering the Regional Greenhouse Gas Initiative (RGGI) program.

1.0 Background

Newark Bay operates a cogeneration facility located at 414-462 Avenue P, Newark, Essex County, New Jersey. The facility consists of two (2) Westinghouse CW251/B-12 combustion turbines with unfired heat recovery steam generators (HRSGs) with a nominal heat input of 640 MMBtu/hr each, and one (1) Victory Energy package boiler with a nominal heat input of 38 MMBtu/hr. The primary fuel for the combustion turbines and boiler is natural gas with ultra-low sulfur distillate oil (ULSD) as backup. A selective catalyst reduction (SCR) is utilized to control nitrogen oxides (NO_x) in the combustion turbine/HRSG units.

2.0 Addition of Compliance Plan Requirements associated with RGGI

With this application, we are requesting to include the compliance plans associated with New Jersey becoming part of RGGI in accordance with N.J.A.C. 7:27C-3.3. Note that there will be no physical change in, or change in the method of operation of the combustion turbines. The Form NJ03 - Application for Adding a CO₂ Budget Source in Operating Permit for Newark Bay is included as Attachment A.

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 B.

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
D. Cupo
K. Davis
S. Chan, EPA Region 2

THE WCM GROUP, INC.

110 S. Bender Ave.

Humble, TX 77338

ATTACHMENT A
NJ03 - RGGI APPLICATION



CO2 BUDGET TRADING PROGRAM | NJ03 - APPLICATION FOR ADDING A CO2 BUDGET SOURCE IN OPERATING PERMIT
 Consistent with N.J.A.C. 7:27C-3.3

1. FACILITY INFORMATION

Facility PI: Facility Name: ORIS Code:

CO2 Authorized Account Representative Name: Title:

2. CO2 BUDGET UNIT IDENTIFICATION

| CO2 Budget Unit ID | CO2 Budget Unit Description | Op. Permit U# | Op. Permit E# |
|--------------------|---|---------------|---------------|
| 1001 | CT No. 1 640 MMBtu/hr gas turbine with HRSG | U1 | E1 |
| 2001 | CT No. 2 640 MMBtu/hr gas turbine with HRSG | U2 | E2 |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

3. COMPLIANCE REQUIREMENTS AND CERTIFICATION

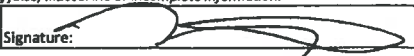
The CO2 budget source and each CO2 budget unit at the source must comply with the general provisions at N.J.A.C. 7:27C-1.4, compliance requirements at N.J.A.C. 7:27C-6.9, and monitoring, recordkeeping, and reporting requirements at N.J.A.C. 7:27C-8. The Department will incorporate these requirements into the facility's operating permit pursuant to N.J.A.C. 7:27-22.28. See the compliance plan template at the link above.

A Compliance Certification must be submitted for the CO2 budget source and each CO2 budget unit at the source by March 1 following the relevant control period or initial control period (not required during an interim control period).

4. APPLICATION CERTIFICATION

Responsible Official as Defined in N.J.A.C. 7:27- 1.4

"I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in this attachment to the RADIUS Operating Permit Application and all attached documents and, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine or imprisonment or both, for submitting false, inaccurate or incomplete information."

Name: Signature:  Date:

Individuals (may include consultants) with direct knowledge of and responsibility for the information contained within this document as defined in N.J.A.C. 7:27-1.4

"I certify, under penalty of law, that I believe the information provided in this document is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine and imprisonment or both, for submitting false, inaccurate or incomplete information."

Name: Signature:  Date:

THE WCM GROUP, INC.

110 S. Bender Ave.

Humble, TX 77338

**ATTACHMENT B
RADIUS APPLICATION**

**New Jersey Department of Environmental Protection
Reason for Application**

Permit Being Modified

Permit Class: BOP **Number:** 160001

Description of Modifications: In accordance with N.J.A.C. 7:27-22.23, this Minor Modification is being submitted to incorporate those requirements to conform to New Jersey re-entering the Regional Greenhouse Gas Initiative (RGGI) program in accordance with N.J.A.C.7:27C3.3.

**New Jersey Department of Environmental Protection
Facility Profile (General)**

Facility Name (AIMS): Newark Bay Cogeneration Partnership LP

Facility ID (AIMS): 07617

Street 414-462 AVE P
Address: NEWARK, NJ 07105

Mailing 414-462 AVE P
Address: NEWARK, NJ 07105

County: Essex
Location
Description:

| | |
|---------------------------------|---------------|
| State Plane Coordinates: | |
| X-Coordinate: | 594,597 |
| Y-Coordinate: | 687,466 |
| Units: | Feet |
| Datum: | Unknown |
| Source Org.: | Other/Unknown |
| Source Type: | Hard Copy Map |

| | |
|-----------------------|--------|
| Industry: | |
| Primary SIC: | 4931 |
| Secondary SIC: | |
| NAICS: | 221112 |

**New Jersey Department of Environmental Protection
Facility Profile (General)**

Contact Type: Air Permit Information Contact

Organization: Newark Bay Cogeneration Partnership, L.P. **Org. Type:** Partnership
Name: Mark Driscoll **NJ EIN:** 51030292900
Title: Environmental Director
Phone: (848) 448-4852 x **Mailing Address:** 414-462 Avenue P
Fax: (973) 491-9560 x Newark, NJ 07105
Other: () - x
Type:
Email: Mark.Driscoll@TalenEnergy.com

Contact Type: Consultant

Organization: The WCM Group, Inc. **Org. Type:** Corporation
Name: Kerry Higgins **NJ EIN:** 51030292900
Title: Sr. Director, Technical Services
Phone: (281) 446-7070 x **Mailing Address:** P.O. Box 3247
Fax: (281) 446-3348 x Humble, TX 77347-3247
Other: () - x
Type:
Email: khiggins@wcmgroup.com

Contact Type: Emission Statements

Organization: Newark Bay Cogeneration Partnership, L.P. **Org. Type:** Partnership
Name: Mark Driscoll **NJ EIN:** 51030292900
Title: Environmental Director
Phone: (848) 448-4852 x **Mailing Address:** 414-462 Avenue P
Fax: (973) 491-9560 x Newark, NJ 07105
Other: () - x
Type:
Email: Mark.Driscoll@TalenEnergy.com

**New Jersey Department of Environmental Protection
Facility Profile (General)**

Contact Type: Environmental Officer

Organization: Newark Bay Cogeneration Partnership, L.P. **Org. Type:** Partnership
Name: Mark Driscoll **NJ EIN:** 51030292900
Title: Environmental Director
Phone: (848) 448-4852 x **Mailing Address:** 414-462 Avenue P
Fax: (973) 491-9560 x Newark, NJ 07105
Other: () - x
Type:
Email: Mark.Driscoll@TalenEnergy.com

Contact Type: Fees/Billing Contact

Organization: Ethos Energy Group **Org. Type:** Corporation
Name: Richard Merker **NJ EIN:** 50130292900
Title: Facility Manager
Phone: (973) 491-9559 x0213 **Mailing Address:** 414-465 Avenue P
Fax: (973) 491-9650 x Newark, NJ 07105
Other: () - x
Type:
Email: Richard.Merker@ethosenergygroup.com

Contact Type: On-Site Manager

Organization: Ethos Energy Group **Org. Type:** Corporation
Name: Richard Merker **NJ EIN:** 50130292900
Title: Facility Manager
Phone: (973) 491-9559 x0213 **Mailing Address:** 414-465 Avenue P
Fax: (973) 491-9650 x Newark, NJ 07105
Other: () - x
Type:
Email: Richard.Merker@ethosenergygroup.com

**New Jersey Department of Environmental Protection
Facility Profile (General)**

Contact Type: Operator

Organization: Ethos Energy Group **Org. Type:** Corporation
Name: Richard Merker **NJ EIN:** 50130292900
Title: Facility Manager
Phone: (973) 491-9559 x0213 **Mailing Address:** 414-465 Avenue P
Fax: (973) 491-9650 x **Address:** Newark, NJ 07105
Other: () - x
Type:
Email: Richard.Merker@ethosenergygroup.com

Contact Type: Owner (Current Primary)

Organization: Newark Bay Cogeneration Partnership, LP **Org. Type:** Partnership
Name: Scott M. Blair **NJ EIN:** 51030292900
Title: Vice President
Phone: (410) 787-5017 x **Mailing Address:** 1005 Brandon Shores Road
Fax: () - x **Address:** Baltimore, MD 21226
Other: (410) 917-6068 x
Type: Mobile
Email: Scott.Blair@TalenEnergy.com

Contact Type: Responsible Official

Organization: Newark Bay Cogeneration Partnership, L.P. **Org. Type:** Partnership
Name: Mark Driscoll **NJ EIN:** 51030292900
Title: Environmental Director
Phone: (848) 448-4852 x **Mailing Address:** 414-462 Avenue P
Fax: (973) 491-9560 x **Address:** Newark, NJ 07105
Other: () - x
Type:
Email: Mark.Driscoll@TalenEnergy.com

**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