



U.S. Environmental Protection Agency Region 1

Outer Continental Shelf Air Permit:
Deepwater Wind New England, LLC

Meteorological Buoy

Offshore Renewable Wind Energy Project
Massachusetts-Rhode Island Wind Energy Area

Response to Comments on
EPA Draft Permit Number
OCS-R1-02

Introduction

On March 25, 2019, EPA Region 1 published notices in the Standard-Times (New Bedford) for public review and comment of a proposed Outer Continental Shelf Air Permit for the Deepwater Wind New England, LLC Meteorological Buoy located in Federal waters off the coast of Massachusetts and Rhode Island. The comment period ran through April 26, 2019. EPA also held a public hearing at the New Bedford Free Public Library in New Bedford, Massachusetts on Thursday, April 25, 2019. Comments were submitted by Orsted Wind Power North America LLC, an affiliate of Deepwater Wind New England, LLC, during the public comment period.

After a review of the comments received, EPA has made a final decision to issue this OCS permit. As required by 40 CFR part 124 (Procedures for Decisionmaking), EPA has prepared this document known as the “response to comments” (RTC) that describes and addresses the significant issues raised during the comment period and describes the provisions of the draft permit that have been changed and the reasons for the changes. Since the Fact Sheet is a final document, no changes were made to it. Instead, comments on the Fact Sheet were noted, and responses to them are included in this document.

The Final Permit is substantially the same as the Draft Permit that was available for public comment. Although EPA’s decision-making process has benefitted from the comments and additional information submitted, the information and arguments presented did not raise any substantial new questions concerning the permit. EPA did, however, make certain clarifications, and revise some permit conditions in response to comments. These improvements and changes are detailed in this document and reflected in the Final Permit. A summary of the changes made in the Final Permit are listed below. The analyses underlying these changes are explained in the

responses to individual comments that follow. The Final Permit and RTC are available on EPA's web site at <https://www.epa.gov/caa-permitting/epa-issued-caa-permits-region-1>. EPA is mailing the RTC and the Final Permit to the commenter and individuals who requested a copy. Copies of the Final Permit also may be obtained by writing or calling EPA between the hours of 9:00 a.m. and 5:00 p.m., Monday through Friday, excluding holidays:

Donald Dahl, Environmental Engineer
U.S. Environmental Protection Agency – Region 1
5 Post Office Square Suite 100, Mail code: 05-2
Boston, MA 02109-3912
Telephone: (617) 918-1657
Dahl.donald@epa.gov

The complete text of each comment as submitted, and a complete copy of the transcript from the public hearing, are in the administrative record and available by request.

Changes to Permit

The following is the list of revisions that EPA made from the Draft Permit to the Final Permit based on comments received during the comment period and clarification regarding the location of where the Permittee will be required to maintain records. The list includes a brief description of the revision, and the location in the RTC document where EPA provides a more detailed description of the revision.

Revision 1: The table at Section II. has been revised to reference the Back-up Engine Installed on the Met Buoy as an 11-kilowatt (kW) ultra-low sulfur diesel (ULSD) fired emergency engine. This revision is not directly related to any comment received, but consistent with other changes the commenter is seeking with respect to the maximum power output of the Met buoy Engine.

Revision 2: The definition of Met Buoy Engine at Section III. was changed to reflect the engine's maximum power output of 11 kW. The condition previously stated the engine's maximum power output was 8.5 kW, which was consistent with information supplied by the applicant at the time of issuance of the Draft Permit. This revision pertains to Comment 1 below.

Revision 3: Permit condition IV.A.4. was changed to reflect the engine's maximum power output of 11 kW. The condition previously stated the engine's maximum power output was 8.5 kW, which was consistent with information supplied by the applicant at the time of issuance of the Draft Permit. This revision pertains to Comment 2 below.

Revision 4: Permit condition VIII.5 was revised to clarify the physical location where the Permittee will maintain all records required by the permit. This revision is not in response to a specific comment from the public. The revision is as follows:

~~“The Permittee shall hold at its the office of DWW, which is located at the address specified on page 1 of this permit,~~ all records required by the permit including, but not

limited to, monitoring data and support information required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained for at least five years from the date of the sample, measurement, or report unless otherwise specified.”

None of the changes identified above necessitated changes to the Met Buoy Engine emission limits, as the underlying applicable requirement, 40 C.F.R. § 1039.102(b), is applicable to engines with model years between 2008 and 2014 with a maximum engine power of between 8 and 19 kW.

Response to Comments

The following is the list of comments that were received during the comment period on the Draft Permit. The list includes a brief description of the comment, EPA’s response, and the location in the RTC document, if revisions were required.

Comment 1

Change the definition of Met Buoy to include an engine with a maximum power up to 11 kW. Although the proposed engine for the Met Buoy has a nominal rating of 8.5 kW, its nameplate indicates that it has a maximum rating of 11 kW. The emission limits listed in the permit do not change for this change in engine size.

Response 1

EPA agrees to revise the definition of Met Buoy Engine (not the definition of Met Buoy, as requested by the commenter) to reflect the maximum power output of the engine as 11 kW. EPA also concurs that the emissions limits do not necessitate a change due to this revision. EPA is also making a revision to the table at Section II. of the Final Permit to reflect the maximum power output of the engine as 11 kW in order to be consistent with the maximum power output of the Met Buoy Engine throughout the Final Permit. These revisions coincide with Revision 1 and 2 of this RTC document.

Comment 2

Change Section IV.A.4. to reflect the maximum engine power as 11 kW.

Response 2

EPA agrees to revise Section IV.A.4. to reflect the maximum engine power as 11 kW. This revision coincides with Revision 3 of this RTC document.

Comment 3

Why are the standby engine emissions not included on Line 2 “Annual Maintenance Emissions” of Table 1 of Section V. of the Fact Sheet? Shouldn’t Line 2 be listed as “Annual Operation & Maintenance Emissions”?

Response 3

The EPA has reviewed the application and notes that generator emissions were inadvertently excluded from Table 1 of the Fact Sheet. A corrected emissions table is provided below; however, the Fact Sheet is a final document, and no changes have been made to it.

Table 1
Met Buoy Project's Potential Emissions

Areas where emissions occur (tons per year)		CO	NO _x	PM ₁₀	PM _{2.5}	SO ₂	VOC
1	Construction Emissions	3.07	6.10	0.37	0.36	0.0041	0.31
2	Annual Operation & Maintenance Emissions	0.15	0.30	0.008	0.008	0.0002	0.008
		<u>0.18</u>	<u>0.33</u>	<u>0.01</u>	<u>0.01</u>		<u>0.013</u>
3	Decommissioning Emissions	3.07	6.10	0.37	0.36	0.0041	0.31
4	Maximum annual emissions	3.22	6.40	0.38	0.37	0.0043	0.32

Comment 4

Section VII. A. of the Fact Sheet should change engine size to 11 kW.

Response 4

EPA acknowledges the change in maximum engine power the commenter is seeking and has made the revisions to the Final Permit, as discussed in Revision 1, 2, and 3 of this RTC document. However, as stated above, the Fact Sheet is a final document, and no changes have been made to it.