

From: [McGrath, Morgan](#)
To: ["ralph.perron@usda.gov"](#); ["john.sinclair@usda.gov"](#); ["derek.ibarguen@usda.gov"](#); ["tim_allen@fws.gov"](#); ["bill_gawley@nps.gov"](#); ["holly_salazer@nps.gov"](#); ["andrea_stacy@nps.gov"](#); ["kirsten_king@nps.gov"](#); ["john_notar@nps.gov"](#)
Cc: [Bird, Patrick](#); [Wortman, Eric](#); [Howlett, Careyanne](#); [Maiti, Pujarini](#); [WILSON, STEPHANIE](#); [Abbegail Nack](#); [AJ Jablonowski](#); [geri](#); [HOFFMAN, CHRISTINA](#); [Joseph Sabato](#)
Subject: Park City Wind LLC, New England Wind 1 and 2, Notice of Receipt of OCS Air Permit Application(s)
Date: Thursday, November 10, 2022 8:20:00 AM
Attachments: [Phase 1 NE Wind OCS Air Permit Application 10-7-22.pdf](#)
[Phase 2 NE Wind OCS Air Permit Application 10-7-22.pdf](#)
[EPA Letter to NE Wind-Phase 1 Info Request.pdf](#)
[EPA Letter to NE Wind-Phase 2 Info Request.pdf](#)
Importance: High

Federal Land Managers,

On October 7, 2022, EPA Region 1 received two (2) separate outer continental shelf air permit applications from Park City Wind LLC for their New England Wind Phase 1 and New England Wind Phase 2 projects. **Through this email, EPA is fulfilling its regulatory obligation to provide notice to Federal Land Managers of receipt of a permit application as required by 40 CFR § 55.6(b)(7).** EPA has completed an initial review of the applications for completeness and provided written feedback to the applicant with a request for supplemental information (included as an attachment to this email). We have requested that the applicant provide additional information to the EPA by December 7, 2022. Note that we have consulted with USFS and they have declined to request an AQRV analysis based on the projects' distance from the nearest Class I area. However, we wanted to forward the application along to fulfill notification requirements as part of Part 124.

We will keep you apprised of any comments we may have on the application, and provide you notice of our completeness determination. If you have any questions, please feel free to reach out. Thank you for your cooperation.

Take Care,

Morgan M. McGrath, P.E.

Air Permits, Toxics and Indoor Programs Branch

Air and Radiation Division, US EPA, Region 1

Mailing Address: 5 Post Office Square, Suite 100, MC 05-2, Boston, Massachusetts 02109

Phone: (617) 918-1541

McGrath, Morgan

From: Perron, Ralph - FS, NH <ralph.perron@usda.gov>
Sent: Tuesday, March 7, 2023 5:35 PM
To: McGrath, Morgan
Cc: Sinclair, John - FS, VT; Ibarguen, Derek - FS, NH; Bird, Patrick; Wortman, Eric; Turner, Andre
Subject: RE: Park City Wind LLC, New England Wind 1 and 2, Notice of Receipt of OCS Air Permit Application(s) - Update
Attachments: NEW2 OCS Air Permit Application_1.13.2023.pdf; NEW1 OCS Air Permit Application_1.13.2023.pdf

Hi Morgan,

Thanks for the opportunity to review the revised NEW1 and NEW2 OCS Air Permit Applications. I have reviewed both applications and have no questions, however, I would suggest one edit be considered in the NEW2 permit: page 360 of 388, top table, consider changing the title from "**Class I Significant Impact Level Results ($\mu\text{g}/\text{m}^3$) for Construction**" to "**Class I Significant Impact Level Results ($\mu\text{g}/\text{m}^3$) for Construction: 50 km.**"



Ralph Perron (he/him)
Air Quality Specialist

Forest Service
Eastern Region

cell: 802-222-1444

ralph.perron@usda.gov



Caring for the land and serving people

From: McGrath, Morgan <McGrath.Morgan@epa.gov>
Sent: Friday, February 24, 2023 3:14 PM
To: Perron, Ralph - FS, NH <ralph.perron@usda.gov>
Cc: Sinclair, John - FS, VT <john.sinclair@usda.gov>; Ibarguen, Derek - FS, NH <derek.ibarguen@usda.gov>; Bird, Patrick <Bird.Patrick@epa.gov>; Wortman, Eric <Wortman.Eric@epa.gov>; Turner, Andre <Turner.Andre@epa.gov>
Subject: Park City Wind LLC, New England Wind 1 and 2, Notice of Receipt of OCS Air Permit Application(s) - Update

Hi Ralph,

I hope you are doing well! Following up on the email below, we have determined the outer continental shelf (OCS) air permit applications from Park City Wind LLC for their New England Wind Phase 1 and New England Wind Phase 2 projects complete as of February 13, 2023. In order for us to make the completeness determination, the applicant had to submit supplemental* information. Therefore, we have attached the revised application for both projects to fulfill notification requirements as required by Part 124. We are currently working on the draft permit. As done in the past, the FLMs will be notified of the public comment period for each of the draft permits.

Please let us know if you have further questions or comments.

Take Care,

Morgan M. McGrath, P.E.

Air Permits, Toxics and Indoor Programs Branch
Air and Radiation Division, US EPA, Region 1

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*Note that the projects' distance from the nearest Class I area has not changed. Therefore, the consultation with USFS in July 2022 is presumed to still be valid, (i.e. where they declined to request an AQRV analysis based on the projects' distance from the nearest Class I area).

From: Perron, Ralph -FS <ralph.perron@usda.gov>
Sent: Thursday, November 10, 2022 12:44 PM
To: McGrath, Morgan <McGrath.Morgan@epa.gov>
Cc: Sinclair, John -FS <john.sinclair@usda.gov>; Ibarguen, Derek -FS <derek.ibarguen@usda.gov>; Bird, Patrick <Bird.Patrick@epa.gov>; Wortman, Eric <Wortman.Eric@epa.gov>
Subject: RE: [External Email]Park City Wind LLC, New England Wind 1 and 2, Notice of Receipt of OCS Air Permit Application(s)

Hi Morgan,

Thanks for sharing this information. Thanks for offering to keep us apprised of any comments you may have on the application, and providing notice of your completeness determination; we would appreciate being kept in the loop on the progress of these proposals.



Ralph Perron (he/him)
Air Quality Specialist

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Caring for the land and serving people

From: McGrath, Morgan <McGrath.Morgan@epa.gov>
Sent: Thursday, November 10, 2022 8:23 AM
To: Perron, Ralph -FS <ralph.perron@usda.gov>; Sinclair, John -FS <john.sinclair@usda.gov>; Ibarguen, Derek -FS <derek.ibarguen@usda.gov>; Allen, Tim <tim_allen@fws.gov>; Bill_Gawley@nps.gov; holly_salazer@nps.gov; Stacy, Andrea <andrea_stacy@nps.gov>; kirsten_king <kirsten_king@nps.gov>; John_Notar@nps.gov
Cc: Bird, Patrick <Bird.Patrick@epa.gov>; Wortman, Eric <Wortman.Eric@epa.gov>; Howlett, Careyanne <Howlett.Careyanne@epa.gov>; Maiti, Pujarini <Maiti.Pujarini@epa.gov>; WILSON, STEPHANIE <stephanie.wilson@avangrid.com>; Abbegail Nack <anack@epsilonassociates.com>; AJ Jablonowski <ajablonowski@epsilonassociates.com>; geri <geri@gedenslaw.com>; HOFFMAN, CHRISTINA <christina.hoffman@avangrid.com>; Joseph Sabato <JSabato@epsilonassociates.com>
Subject: [External Email]Park City Wind LLC, New England Wind 1 and 2, Notice of Receipt of OCS Air Permit Application(s)
Importance: High

[External Email]

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Federal Land Managers,

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We will keep you apprised of any comments we may have on the application, and provide you notice of our completeness determination. If you have any questions, please feel free to reach out. Thank you for your cooperation.

Take Care,

Morgan M. McGrath, P.E.

Air Permits, Toxics and Indoor Programs Branch

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From: [Bird, Patrick](#)
To: [Sinclair, John -FS](#)
Cc: [Olson, Shawn -FS](#); [Perron, Ralph -FS](#); [Barnes, Martina -FS](#); [Mckinley, Daniel -FS](#); [Wortman, Eric](#); [McAlpine, Jerrold](#); [Howlett, Careyanne](#)
Subject: RE: New England Wind Phase I and Phase II Modeling Protocols
Date: Wednesday, July 13, 2022 1:35:21 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Hi John,

I appreciate your review, and we will communicate this information to the developer on your behalf. I'll also include this correspondence in the administrative record for our permitting actions on the New England Wind projects.

We will continue to provide you with updates on these and other offshore wind projects with respect to Clean Air Act permitting as they move through the process. As always, I thank you for you and your team's attention to the materials we send along.

Thanks again,

Pat

Patrick Bird
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From: Sinclair, John -FS <john.sinclair@usda.gov>
Sent: Wednesday, July 13, 2022 3:50 PM
To: Bird, Patrick <Bird.Patrick@epa.gov>
Cc: Olson, Shawn -FS <shawn.olson@usda.gov>; Perron, Ralph -FS <ralph.perron@usda.gov>; Barnes, Martina -FS <martina.barnes@usda.gov>; Mckinley, Daniel -FS <daniel.mckinley@usda.gov>
Subject: FW: New England Wind Phase I and Phase II Modeling Protocols

Pat,

Thank you for the opportunity to review the modeling protocol for New England Wind, consisting of the Park City and Commonwealth Wind projects. I am the Federal Land Manager responsible for the management of the Lye Brook Class I Wilderness Areas.

We have reviewed the modeling protocol, which was received on May 11, 2022. Our understanding

is that the shortest distance between the Lye Brook Class I area receptors and the nearest proposed turbine for both project is approximately 300 km. Based on the information provided, the highest emissions occur during construction and drop significantly after construction is completed. Further, proposed emission calculations appear to be very conservative, and include total maximum emissions from the proposed construction of wind turbines, which are 1 km apart, as well as all associated mobile sources.

Due to the information listed above, and considering the temporary nature of the emissions, as well as the long-term emission reduction that will occur once the wind project is complete, the US Forest Service will not be requesting Air Quality Related Values analyses for this project.

Please keep us informed of any significant changes in this project, as well as any other proposal which may have an impact on either the Lye Brook, Great Gulf, or Presidential Range-Dry River Wilderness Areas.

I appreciate the efforts of the U.S. EPA Region 1 staff to work with Forest Service air quality specialists on this project and the continued open communication. I look forward to continuing to work closely with U.S. EPA Region 1 in the future to reduce air pollution and the associated impacts to the Green Mountain National Forest.

John



John Sinclair
Forest Supervisor

Forest Service
Green Mountain and Finger Lakes National Forests

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Caring for the land and serving people

From: Bird, Patrick <Bird.Patrick@epa.gov>

Sent: Wednesday, May 11, 2022 12:38 PM

To: Perron, Ralph -FS <ralph.perron@usda.gov>; Sinclair, John -FS <john.sinclair@usda.gov>; Ibarguen, Derek -FS <derek.ibarguen@usda.gov>; Allen, Tim <tim_allen@fws.gov>; John_Notar@nps.gov; kirsten_king <kirsten_king@nps.gov>; Stacy, Andrea <andrea_stacy@nps.gov>; holly_salazer@nps.gov; Bill_Gawley@nps.gov; Anderson, Bret -FS <bret.a.anderson@usda.gov>; Meyer, Mark E <Mark_E_Meyer@nps.gov>

Cc: Wortman, Eric <Wortman.Eric@epa.gov>; Jay McAlpine <mcalpine.jay@epa.gov>; geri <geri@gedenslaw.com>; AJ Jablonowski <ajablonowski@epsilonassociates.com>; Abbegail Nack <anack@epsilonassociates.com>; HOFFMAN, CHRISTINA <christina.hoffman@avangrid.com>;

WILSON, STEPHANIE <stephanie.wilson@avangrid.com>

Subject: [External Email]FW: New England Wind Phase I and Phase II Modeling Protocols

[External Email]

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Federal Land Managers,

I wanted to provide you with a revised modeling protocol that's been submitted to EPA Region 1 for New England Wind, consisting of the Park City and Commonwealth Wind projects. We'll be reviewing the revised protocol and providing comments, as necessary. Our plan is to schedule a meeting with the applicant after we complete our review, and I intent to invite Federal Land Managers to that meeting.

I welcome your feedback on the protocol.

Thanks, and feel free to reach out if you have any questions.

Pat

Patrick Bird
US EPA Region 1
5 Post Office Square, 05-2
Boston, MA 02109
p: 617-918-1287
e: bird.patrick@epa.gov

From: Joseph Sabato <JSabato@epsilonassociates.com>

Sent: Monday, May 9, 2022 8:10 PM

To: McAlpine, Jerrold <McAlpine.Jay@epa.gov>

Cc: Bird, Patrick <Bird.Patrick@epa.gov>; Wortman, Eric <Wortman.Eric@epa.gov>; geri <geri@gedenslaw.com>; AJ Jablonowski <ajablonowski@epsilonassociates.com>; Abbegail Nack <anack@epsilonassociates.com>; HOFFMAN, CHRISTINA <christina.hoffman@avangrid.com>; WILSON, STEPHANIE <stephanie.wilson@avangrid.com>

Subject: New England Wind Phase I and Phase II Modeling Protocols

Jay –

Please find attached the air dispersion modeling protocols describing the air dispersion modeling analyses proposed for New England Wind Phase 1 and New England Wind Phase 2. Also attached is a comment response memo responding to comments received based on EPA's review of the previous air modeling protocol. Please let us know if you have any questions or concerns. We look forward to further discussions.

Regards,
Joe and Abbey

Joseph Sabato, CCM
Senior Consultant

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From: [Abbegail Nack](#)
To: [AJ Jablonowski](#); [Perron, Ralph -FS](#); bret.a.anderson@usda.gov
Cc: [geri](#); [Wortman, Eric](#); [HOFFMAN, CHRISTINA](#); stephanie.wilson@avangrid.com; [McAlpine, Jerrold](#); [Joseph Sabato](#); [Bird, Patrick](#)
Subject: RE: New England Wind Phase I and Phase II Modeling Protocols
Date: Friday, July 1, 2022 10:19:41 AM

Hi Ralph,

Our apologies, we noticed that two of the labels in the table were flip-flopped (H₂SO₄ and PM₁₀). Here is the corrected table of short-term emission rates in US tons per year:

NOx	SO2	H2SO4	PM10
4,278	68	3.1	129

Thank you,

Abbegail H. Nack, PE | Project Engineer

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From: AJ Jablonowski <ajablonowski@epsilonassociates.com>
Sent: Friday, July 1, 2022 8:41 AM
To: Perron, Ralph -FS <ralph.perron@usda.gov>; Anderson, Bret -FS <bret.a.anderson@usda.gov>
Cc: geri <geri@gedenslaw.com>; Abbegail Nack <anack@epsilonassociates.com>; Wortman, Eric <Wortman.Eric@epa.gov>; HOFFMAN, CHRISTINA <christina.hoffman@avangrid.com>; stephanie.wilson@avangrid.com; Jay McAlpine <mcalpine.jay@epa.gov>; Joseph Sabato <JSabato@epsilonassociates.com>; Bird, Patrick <Bird.Patrick@epa.gov>
Subject: RE: New England Wind Phase I and Phase II Modeling Protocols

Ralph,

Here are the preliminary short-term emission rate numbers, converted to tons per year:

NOx	SO2	PM10	H2SO4
4,278	68	3.1	129

Items to note:

- Because the short-term estimates are based on a specific activity, and the sequence of activities is the same for both Projects, this estimate is the same for both Projects.

- This reflects the highest estimate of the different major construction activities (the highest-emitting activity is foundation installation). The highest emissions drop significantly once construction is completed.
- The emissions won't come from one stack, but 74 different stacks on vessels spread out around one foundation position. All of the foundation installation vessels will be in motion.
- The estimate assumes the entire foundation gets installed in a single 24-hour period. After the foundation is installed, the vessels will move to the next foundation location. Locations are at least a nautical mile apart.
- On some days, other lower-emitting activities could be happening at a different location. Those activities would be at least a nautical mile away, and likely several nautical miles away.
- The distances to the Class I areas shown in the protocols (300+ km) are measured from the closest locations. The Phase 1 portion of the Southern Wind Development Area is up to 231 square kilometers, and the Phase 2 portion of the Southern Wind Development Area is up to 303 square kilometers. As such, most of the emissions will occur significantly further than 300 km away from any Class I area.
- As noted in the May 9th Protocols, the wind direction blows towards Lye Brook Wilderness less than 3% of the time.
- As you know, because these are short-term estimates they are higher than the "maximum construction emissions during one year" presented in Table 2-4 of each Protocol.

Thanks and please let us know if you have any questions.

A.J. Jablonowski, P.E. | Principal

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Maynard, Massachusetts 01754

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ajablonowski@epsilonassociates.com | www.epsilonassociates.com

From: Wortman, Eric <Wortman.Eric@epa.gov>

Sent: Thursday, June 2, 2022 3:33 PM

To: Perron, Ralph -FS <ralph.perron@usda.gov>; Bird, Patrick <Bird.Patrick@epa.gov>; Sinclair, John -FS <john.sinclair@usda.gov>; Ibarguen, Derek -FS <derek.ibarguen@usda.gov>; Allen, Tim <tim_allen@fws.gov>; John_Notar@nps.gov; kirsten_king@nps.gov; Stacy, Andrea <andrea_stacy@nps.gov>; holly_salazer@nps.gov; Bill_Gawley@nps.gov; bret.a.anderson@usda.gov; Meyer, Mark E <Mark_E_Meyer@nps.gov>

Cc: McAlpine, Jerrold <McAlpine.Jay@epa.gov>; geri <geri@gedenslaw.com>; AJ Jablonowski <ajablonowski@epsilonassociates.com>; Abbegail Nack <anack@epsilonassociates.com>; HOFFMAN, CHRISTINA <christina.hoffman@avangrid.com>; WILSON, STEPHANIE <stephanie.wilson@avangrid.com>

Subject: RE: [External Email]FW: New England Wind Phase I and Phase II Modeling

Protocols

Hi Ralph, et al.,

Thanks for flagging this. You are correct that the current protocols do not include the short-term emission rates. The applicant should provide the preliminary short-term emission rate numbers that you need to compare against FLAG thresholds.

The New England Wind permitting team is copied on this email, and I'm requesting they work with you directly to provide the requested information identified below for a Q/D analysis under the Class I FLAG guidance. Please continue to include EPA via cc on any future correspondence.

Thanks,

Eric

Eric Wortman
U.S. EPA Region 1
5 Post Office Square, Suite 100
Boston, Massachusetts 02109
Telephone: (617) 918-1624 | Email: wortman.eric@epa.gov

From: Perron, Ralph -FS <ralph.perron@usda.gov>
Sent: Friday, May 27, 2022 12:12 PM
To: Bird, Patrick <Bird.Patrick@epa.gov>; Sinclair, John -FS <john.sinclair@usda.gov>; Ibarguen, Derek -FS <derek.ibarguen@usda.gov>; Allen, Tim <tim_allen@fws.gov>; John_Notar@nps.gov; kirsten_king <kirsten_king@nps.gov>; Stacy, Andrea <andrea_stacy@nps.gov>; holly_salazer@nps.gov; Bill_Gawley@nps.gov; bret.a.anderson@usda.gov; Meyer, Mark E <Mark_E_Meyer@nps.gov>
Cc: Wortman, Eric <Wortman.Eric@epa.gov>; McAlpine, Jerrold <McAlpine.Jay@epa.gov>; geri <geri@gedenslaw.com>; AJ Jablonowski <ajablonowski@epsilonassociates.com>; Abbegail Nack <anack@epsilonassociates.com>; HOFFMAN, CHRISTINA <christina.hoffman@avangrid.com>; WILSON, STEPHANIE <stephanie.wilson@avangrid.com>
Subject: RE: [External Email]FW: New England Wind Phase I and Phase II Modeling Protocols

Hi Pat,

For Phase 1 (Park City), the modeling protocol you shared lists total construction emissions of NOx at 3893 (US tons) (Table 2-4). What is the annual max NOx, SO2, PM10, and H2SO4 based on 24 hour max allowable emissions for the construction period?

For Phase 2 (Commonwealth Wind), the modeling protocol you shared lists total construction emissions of NOx at 5424 (US tons) (Table 2-4). What is the annual max NOx, SO2, PM10, and H2SO4 based on 24 hour max allowable emissions for the construction period?

Thanks,

Ralph Perron (he/him)
Air Quality Specialist

Forest Service
Eastern Region

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Sent: Wednesday, May 11, 2022 12:38 PM
To: Perron, Ralph -FS <ralph.perron@usda.gov>; Sinclair, John -FS <john.sinclair@usda.gov>; Ibarguen, Derek -FS <derek.ibarguen@usda.gov>; Allen, Tim <tim_allen@fws.gov>; John_Notar@nps.gov; kirsten_king <kirsten_king@nps.gov>; Stacy, Andrea <andrea_stacy@nps.gov>; holly_salazer@nps.gov; Bill_Gawley@nps.gov; Anderson, Bret -FS <bret.a.anderson@usda.gov>; Meyer, Mark E <Mark_E_Meyer@nps.gov>
Cc: Wortman, Eric <Wortman.Eric@epa.gov>; Jay McAlpine <mcalpine.jay@epa.gov>; geri <geri@gedenslaw.com>; AJ Jablonowski <ajablonowski@epsilonassociates.com>; Abbegail Nack <anack@epsilonassociates.com>; HOFFMAN, CHRISTINA <christina.hoffman@avangrid.com>; WILSON, STEPHANIE <stephanie.wilson@avangrid.com>
Subject: [External Email]FW: New England Wind Phase I and Phase II Modeling Protocols

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I welcome your feedback on the protocol.

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Pat

Patrick Bird
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Sent: Monday, May 9, 2022 8:10 PM
To: McAlpine, Jerrold <McAlpine.Jay@epa.gov>
Cc: Bird, Patrick <Bird.Patrick@epa.gov>; Wortman, Eric <Wortman.Eric@epa.gov>; geri <geri@gedenslaw.com>; AJ Jablonowski <ajablonowski@epsilonassociates.com>; Abbegail Nack <anack@epsilonassociates.com>; HOFFMAN, CHRISTINA <christina.hoffman@avangrid.com>; WILSON, STEPHANIE <stephanie.wilson@avangrid.com>
Subject: New England Wind Phase I and Phase II Modeling Protocols

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Regards,
Joe and Abbey

Joseph Sabato, CCM
Senior Consultant

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