



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

5 Post Office Square, Suite 100
Boston, MA 02109-3912

SENT VIA ELECTRONIC MAIL

February 28, 2023

Jennifer Flood
SouthCoast Wind Energy, LLC
101 Federal St., Suite 1900
Boston, MA 02110
jennifer.flood@SouthCoastWind.com

Subject: SouthCoast Wind Energy, LLC Outer Continental Shelf Air Permit Application –
Request for Additional Information

Dear Ms. Flood,

The U.S. Environmental Protection Agency, Region 1 (EPA) has conducted its review of supplemental materials, submitted on January 24, 2023, which serve as an addendum to your November 23, 2022, permit application under the Outer Continental Shelf (OCS) air regulations at 40 CFR part 55 for the SouthCoast Wind, LCC offshore wind farm project (formerly known as Mayflower Wind, LLC).

After review of the supplemental materials, EPA requests further clarification and revisions to the materials in order for us to deem the permit application complete. The regulations at 40 CFR § 55.6(a)(1)(i) provide for the applicant to submit all information necessary to perform any analysis or make any determination under 40 CFR § 55.6. At this time, the EPA cannot find the application complete until additional information or clarifications are received. The EPA is requesting that Southcoast Wind, LLC submit the information requested in the enclosure to this letter by March 14, 2023.

Please note that as the EPA develops the draft permit and supplemental documents, we may identify further information that will be needed to enable the Agency to make permit decisions, including information that may be needed in response to any public comments on the draft permit.

We look forward to continuing to work with you on the Southcoast Wind project. If you have any questions or would like to schedule a discussion of EPA's comments, please contact Andre Turner of my staff at (617) 918-1216 or turner.andre@epa.gov

Sincerely,

Patrick Bird, Manager
Air Permits, Toxics, & Indoor Programs Branch

Enclosure

cc: Caitlin Fitzpatrick, SCW (Caitlin.Fitzpatrick@SouthCoastWind.com)
Amanda MacNutt, AECOM (amanda.macnutt@aecom.com)
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ENCLOSURE

Additional Information Requested for SouthCoast Wind Energy, LLC's to Supplement the January 24, 2023 Air Quality Modeling Report

The regulations at 40 CFR § 55.6(a)(1)(i) require the applicant to submit all information necessary to perform any analysis or make any determination under 40 CFR § 55.6. At this time, the EPA is seeking the following additional information to assist our permit engineers in understanding your project and in developing a comprehensive permit and administrative record.

Significant comments requiring responses to deem the application complete

1) In Section 4.4.1 (Page 4-11) of the Air Quality Modeling Report, it was indicated that short-term modeled impacts would be determined at two grid nodes (WTG locations) in distance from a central node of focus to determine contributions from adjacent activities. This approach deviates from the proposed screening approach method of accounting for contributions from adjacent activities at the nearest nodes, spaced 1 nautical mile apart in a grid. With a nearest node approach, the maximum distances that could be used for screening would be:

- 2.352 km (i.e., 1.852 km (1 nm) spacing between nodes + 500 m safety zone around the central node) for nodes north, south, east, and west¹ of the central node; or
- 3.119 km (2.619 km spacing + 500 m safety zone around central node) for nodes NW, SW, SE, and NE of the central node (diagonal nodes)

The provided analysis includes some results on adjacent activities where a two nodes spacing was used, determined to be 3.704 km away (1.852 km + 1.852 km).

Additionally, short-term NO₂ and PM_{2.5} impacts exceeded respective thresholds using the first-tier screening procedure, and therefore more refined modeling was required. Refined modeling combined the adjacent activities in the same model runs. Refined runs included central node activities and the activities of adjacent nodes two positions away. EPA has concerns as whether this approach demonstrates compliance with the 1-hour NO₂ NAAQS and 24-hour PM_{2.5} increment.

We request a meeting to discuss further analysis or refinements that could be made to ensure 1-hour NO₂ NAAQS and 24-hour PM_{2.5} increment are being met.

¹ EPA recognizes that project positions/nodes do not use the assigned north-south axis referred to in this comment, however, for illustrative purposes, we have phrased them as such to differentiate between the different directional relationships between positions/nodes.

- 2) EPA requests clarification on the change in vessels associated with activities related to Scenarios 2A and 2B in the modeling as the vessels used in these scenarios deviates from assumptions in the protocol. We request an expanded justification for these changes based on any new information SouthCoast Wind may have on their anticipated construction process and which vessels may be needed for certain activities.