December 22, 2021

Viorica Petriman
U.S. Environmental Protection Agency, Region 2
290 Broadway
New York, NY 10007-1866

Subject: Atlantic Shores Offshore Wind, BOEM Offshore Commercial Wind Lease Area OCS-A 0499, Clean Air Act, Notice of Intent, 40 CFR §55.4

Dear Ms. Petriman:

Atlantic Shores Offshore Wind, LLC (Atlantic Shores), through its wholly owned subsidiaries, Atlantic Shores Offshore Project 1, LLC ("Atlantic Shores Project 1 Company") and Atlantic Shores Offshore Project 2, LLC ("Atlantic Shores Project 2 Company" and together with Atlantic Shores Project 1 Company, the "Project Companies"), is planning to construct, operate, maintain and decommission two offshore wind energy generation projects within the southern portion of its Bureau of Ocean Energy Management (BOEM) lease area under Federal OCS Renewable Energy Lease OCS-A 0499 (the Lease). The offshore wind facilities will also include the associated onshore substation(s) and electric cables as well as the offshore export cables and any necessary support facilities. The two offshore wind energy generation projects are referred to as Atlantic Shores Project 1 and Atlantic Shores Project 2 (each a Project and together, the Projects). As noted above, Atlantic Shores is the 100% owner of the Project Companies. The two Projects combine for a total of 200 wind turbine generators (WTG) with associated offshore substations (OSS). Both Projects are fully described in the Construction and Operations Plan (COP) submitted to BOEM in March 2021 and amended by supplemental submissions to BOEM in September and December 2021.

Epsilon is submitting this letter on behalf of Atlantic Shores and the Project Companies to constitute a Notice of Intent (NOI) for Atlantic Shores Projects 1 and 2, as required per the Outer Continental Shelf (OCS) Air Regulations at 40 CFR §55.4. These regulations require that the NOI be submitted no more than 18 months prior to the submittal of an application for a preconstruction permit. The remainder of this letter addresses the applicable requirements of the regulation with a discussion of the necessary information to document compliance for purposes of this NOI.

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> **40 CFR § 55.4(a).** Prior to performing any physical change or change in method of operation that results in an increase in emissions, and not more than 18 months prior to submitting an application for a preconstruction permit, the applicant shall submit a Notice of Intent ("NOI") to the Administrator through the EPA Regional Office and at the same time shall submit copies of the NOI to the air pollution control agencies of the [Nearest Onshore Area] NOA and onshore areas adjacent to the NOA. This section applies only to sources located within 25 miles of States' seaward boundaries.

Atlantic Shores[1] will submit an application for an OCS Air Permit within 18 months of this NOI per 40 CFR §55.4(a) above. Figure 1 to this NOI shows that the Nearest Onshore Area is New Jersey. At its closest point, the wind turbine area (WTA) is approximately 8.7 miles (mi) (14 kilometers [km]) from the New Jersey shoreline. A copy of this NOI is being submitted to the New Jersey Department of Environmental Protection at the following address:

Danny Wong
New Jersey Department of Environmental Protection
Mail Code 401-02G
401 East State Street
2nd floor
PO Box 420
Trenton, NJ 08625-0420

The other onshore areas that are adjacent to the NOA are Delaware, New York, and Pennsylvania. As such, a copy of this NOI is being submitted to the state air pollution control agencies of Delaware (Delaware Department of Natural Resources and Environmental Control), New York (New York Department Environmental Conservation), and Pennsylvania (Pennsylvania Department of Environmental Protection) at the following addresses:

Angela Marconi, Director
Division of Air Resources
Delaware Department of Natural Resources and Environmental Control
State Street Commons, Suite 6A
100 W. Water Street
Dover, DE 19904

[1] References to Atlantic Shores include the Project Companies, as applicable.

Jared Snyder, Deputy Commissioner
Division of Air Resources
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233-3254

Mark Hammond, Director
Bureau of Air Quality
Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
12th Floor, P.O. Box 8468
Harrisburg, PA 17105-8468

40 CFR § 55.4(b). The NOI shall include the following: (1) General company information, including company name and address, owner's name and agent, and facility site contact.

Company Name: Atlantic Shores Offshore Wind Project 1, LLC
Company Mailing Address: 1 Beacon Street, 15th Floor, Boston, MA 02108
Facility Contact: Paul Phifer, PhD, Permitting Manager

Company Name: Atlantic Shores Offshore Wind Project 2, LLC
Company Mailing Address: 1 Beacon Street, 15th Floor, Boston, MA 02108
Facility Contact: Paul Phifer, PhD, Permitting Manager

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LEGEND

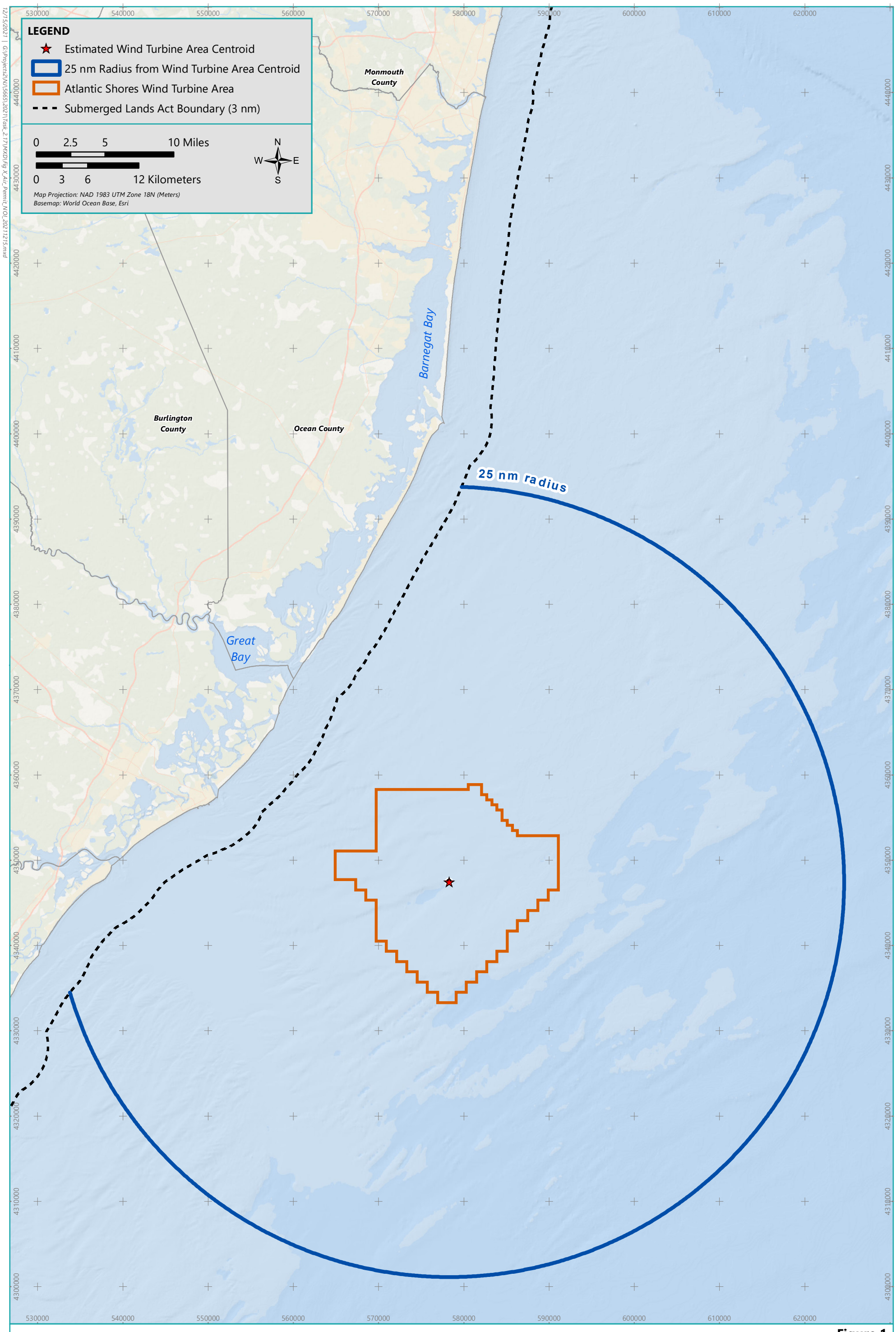
- Estimated Wind Turbine Area Centroid
- 25 nm Radius from Wind Turbine Area Centroid
- Atlantic Shores Wind Turbine Area
- Submerged Lands Act Boundary (3 nm)

0 2.5 5 10 Miles

0 3 6 12 Kilometers

N W E S

Map Projection: NAD 1983 UTM Zone 18N (Meters)
Basemap: World Ocean Base, Esri



ATLANTIC SHORES offshore wind

Figure 1
Wind Turbine Area with 25 nm Radius

40 CFR § 55.4 (b)(2). Facility description in terms of the proposed process and products, including identification by Standard Industrial Classification Code.

In accordance with the New Jersey Offshore Wind Economic Development Act (OWEDA), on June 30, 2021, the New Jersey Board of Public Utilities (NJ BPU) awarded Atlantic Shores Project 1 Company an Offshore Renewable Energy Credit (OREC) allowance to deliver 1,510 megawatts (MW) of offshore renewable energy[2] into the State of New Jersey. The project that will be developed under this OREC award, referred to as Atlantic Shores Project 1, will be owned and operated by Atlantic Shores Project 1 Company. Pursuant to New Jersey Executive Orders #8 and #92, the State will be awarding additional OREC allowances to offshore wind energy projects through a competitive solicitation process every two years through 2026. Atlantic Shores expects to bid into these future New Jersey offshore wind energy solicitations for subsequent projects. Atlantic Shores' second project, referred to as Atlantic Shores Project 2, will be owned and operated by Atlantic Shores Project 2 Company, and is being developed to support these future New Jersey solicitations. Atlantic Shores Projects 1 and 2 are collectively referred to as the "Projects." The Projects will fall under Standard Industrial Classification Code 4911 for electric services, which is defined as establishments that generate, transmit, and/or distribute electricity for sale.

Atlantic Shores Projects 1 and 2 will be located in an approximately 102,124-acre (413.3-km^2) WTA located in the southern portion of the Lease area. Atlantic Shores Project 1 is located in the western area, consisting of 54,175 acres (219.2 km^2), of the WTA and Atlantic Shores Project 2 is located in the eastern area, consisting of 31,847 acres (128.9 km^2), of the WTA, with a 16,102-acre area (65.2-km^2) (the Overlap Area) that could be used by either Project. The Overlap Area is included in the event engineering or technical challenges arise at certain locations in the WTA, and for environmental or other considerations. All WTG positions in the Overlap Area are intended for development and are required to meet the Projects' purpose and need.

The Projects will consist of a total combined 200 WTGs. Project 1 with Overlap Area contains a maximum of 136 WTGs, while Project 2 with Overlap Area contains a maximum of 95 WTGs. There is a potential for 10 offshore substations (five for each project), though there could be fewer OSSs depending on the substation size. There will be up to one meteorological tower, to be installed during Project 1, and up to four temporary meteorological and oceanographic buoys (three for Project 1 and one for Project 2).

[2] The New Jersey Board of Public Utilities awarded a contract to Atlantic Shores for 1,509.6 MW, which solely for convenience is rounded up to 1,510 MW.

The Projects include three options for WTG, OSS, and met tower foundations: piled, suction bucket, or gravity foundations. The WTGs and OSSs for each Project will be connected by a system of 66 kilovolts (kV) to 150 kV high voltage alternating current (HVAC) inter-array cables. OSSs within the WTA may be connected to each other by 66 kV to 275 kV HVAC inter-link cables.

Project 1 and Project 2 will be separate, electrically distinct projects, and energy from the Projects' OSSs will be delivered to shore via HVAC and/or high voltage direct current (HVDC) export cables. For the combined Projects, a total of up to eight export cables will be installed. The export cables will traverse federal and state waters to deliver energy from the OSSs to landfall sites in New Jersey. The Atlantic Export Cable Corridor (ECC) travels from the western tip of the WTA westward to the Atlantic Landfall Site in Atlantic City, New Jersey and has a total length of approximately 12 mi (19 km). The approximately 61 mi (98 km) long Monmouth ECC travels from the eastern corner of the WTA along the eastern edge of the Lease Area to the Monmouth Landfall Site in Sea Girt, New Jersey.

The air pollutant emission sources anticipated to be used during the construction and operation of the Projects are described in the following sections.

40 CFR § 55.4(b)(3). Estimate of the proposed project's potential emissions of any air pollutant, expressed in total tons per year and in such other terms as may be necessary to determine the applicability of requirements of this part. Potential emissions for the project must include all vessel emissions associated with the proposed project in accordance with the definition of potential emissions in §55.2 of this part.

Unlike traditional fossil-fuel based energy generation, the WTGs associated with the Projects will not generate any air pollutant emissions during operation. However, air emissions will occur in connection with Project construction, operations and maintenance (O&M), and decommissioning activities. Air emissions from these Project activities are directly associated with the use of internal combustion engines that generate power for marine construction vessels, vehicles, and tools needed to support the various phases of the Projects. Air emissions will also result from paint use, incidental fuel evaporation, and switchgear capacitor losses.

When determining the potential emissions of a project that are subject to OCS permitting, the air emissions analysis supporting this NOI uses the centroid of the project area as the point around which to generate a 25 nautical mile OCS applicability border.

The following air pollutants were included in the air emissions analysis to support this NOI:

- nitrogen oxides (NOx);
- volatile organic compounds (VOCs);
- carbon monoxide (CO);
- particulate matter smaller than 10 microns (PM_{10}); particulate matter smaller than 2.5 microns ($PM_{2.5}$, a subset of PM_{10});
- sulfur dioxide (SO_2); and
- greenhouse gas (GHG) emissions as carbon dioxide equivalent (CO_2e).

The potential air emissions are separately for the construction and operational periods for discussion purposes in this NOI. Decommissioning emissions are not included in this analysis and a separate OCS air permit will likely be required in the future for the Projects' decommissioning activities. Decommissioning activities generally will occur in the reverse order of construction activities and will be conducted in accordance with the requirements of the Lease.

For purposes of the potential emissions estimation, calculated air emissions are presented as a total potential emissions from both Projects in each construction year and for each operations and maintenance year.

Table 1 provides the preliminary estimate of the potential air emissions subject to the OCS Air Permit during construction of the Projects. Table 1 also provides an estimate of the total emissions during the construction of the Projects (in US tons).

Table 1: Preliminary Potential Air Emissions During Construction

	NO_X, Tons	VOC, Tons	CO, Tons	$PM_{2.5}$, Tons	SO_2, Tons	Total GHG expressed as CO_2E, Tons
Year 1	864.0	18.5	213.9	28.9	3.6	59,706
Year 2	4,341.6	84.6	1,041.3	137.2	14.9	290,909
Projects 1 and 2 Combined Total	5,205.6	103.1	1,255.3	166.1	18.5	350,615

Table 2 provides the preliminary estimate of the potential air emissions subject to the OCS Air Permit during operation and maintenance of the Projects. Table 2 also provides an estimate of the total emissions during the construction of the Project (in tons per year).

Table 2: Preliminary Potential Air Emissions During Operations and Maintenance

	NO_X, Tons	VOC, Tons	CO, Tons	$PM_{2.5}$, Tons	SO_2, Tons	Total GHG expressed as CO_2E, Tons
Projects 1 and 2 Combined Total	397.8	6.8	93.6	12.5	1.2	26,956

Although construction and operation of the Projects will result in air emissions as described above, the Projects will result in a significant net decrease in air pollutant emissions region-wide by displacing electricity generated from fossil fuel power plants. Project 1 will have a nameplate capacity of 1,510 MW. Depending on the use of the Overlap Area and assuming a 15 MW WTG, the Capacity of Project 2 could range between 960 MW and 1,425 MW. Both Projects will result in the generation of clean energy that displaces electricity generated from fossil fuel power plants that otherwise would be required to serve the projected increase in electric demand within regional electric markets. Available data on actual avoided emissions is summarized in Table 3 below. This data is based on capacity of each project with an assumed 50% capacity factor and 4% transmission losses displacing the latest-available output emission rate for the Reliability First Corporation (RFC) East subregion as published by the EPA. Project 2

Table 3: Avoided Air Emissions

	NO_X, Tons/Year	$PM_{2.5}$, Tons/Year	SO_2, Tons/Year	Total GHG expressed as CO_2E, Tons/Year
Project 1	2,162	153	2,549	3,964,000
Project 2*	1,374	97	1,621	2,520,000

*based on a reasonable minimum Project 2 size of 960 MW.

The air emissions reductions shown in Table 3 provide only a partial description of the air quality-related benefits of the Projects, for the following reasons:

- Air emissions calculations for fossil fuel-fired power plants traditionally have not included emissions associated with plant construction, fuel delivery, maintenance, worker commute, safety systems, vehicles, or machinery, when reporting direct emissions. A direct comparison of the avoided air emissions to the projected air emissions would require the addition of emissions from fossil fuel-fired power plans for those emissions categories and activities.

- Each Project will also avoid emissions of certain hazardous air pollutants (HAPs) including mercury, acrolein, formaldehyde, and cadmium associated with fossil fuel generation.

- The emissions reductions will occur at fossil fuel power plants that tend to be near population centers, or upwind of population centers, including overburdened Environmental Justice communities. Project-related air emissions for each Project will predominately occur offshore away from any population centers.

The Projects' avoided emissions will benefit human health and the environment over the entire operational life of the Projects.

40 CFR § 55.4(b)(4). Description of all emissions points including associated vessels.

As discussed above, the operational WTGs will not generate air emissions, but rather displace electricity produced by pollution generating fossil fuel-fired power plants. However, there will be air emissions that result from project-related activities such as operation of engines on vessels, stationary engines on the offshore substations, and equipment engines, and air emissions from miscellaneous fugitive emissions sources, such as paint, incidental fuel evaporation, and switchgear capacitor losses.

Almost all of the offshore air emissions for each Project will be from internal combustion; that is, the use of fuel for vehicle/vessel propulsion, for mechanical work, or for generating electricity (e.g., when shore power is not available or practical).

Construction emissions will result from the required fleet of marine vessels necessary to construct the Projects, many of which are specialty vessels designed specifically for use in the construction of offshore wind farms and installation of the required cables. The construction of the Projects will require the use of many vessel types including a bulk carrier, heavy lift vessels (HLVs), jack-up vessels, crew transfer vessels (CTVs), service operation vessels (SOVs), tugs, barges, dredgers, fall pipe vessels, and cable installation vessels. The construction phase of the Projects will also include emissions from diesel generators used to power equipment such as hydraulic hammers, bubble curtain air compressors, motion compensation systems, and OSS commissioning generators.

Emissions from the O&M phase of the Projects will similarly result from the required vessels to operate and maintain the Projects. Atlantic Shores anticipates the use of an SOV and its associated daughter craft for the primary day to day O&M activities[3]. The SOV

[3] Atlantic Shores is also considering support from CTVs which generally return to port nightly. Based on preliminary evaluations, the SOV concept is estimated to generate slightly more air emissions than the CTVs; therefore, the SOV concept was used to assess air emissions from O&M vessel activity.

would remain offshore in the WTA for days or weeks at a time before returning to port. The workers would be able to access the WTGs and OSS platforms to perform inspections and maintenance on the equipment through the use of CTVs, the SOV daughter craft, or directly from the SOV itself. Crew transfers would occur through the use of CTVs that periodically travel from port to the WTA. Additionally, other vessels (cable repair vessels, jack-up vessels, survey vessels) may be used to perform more significant repairs or routine maintenance and inspections that require more specialized vessels. There are also diesel generators that are located on the OSS platforms that will primarily emit air pollutants during routine testing or events that result in the requirement of emergency power generation by the engines. Emissions may also result from switchgear insulating gas losses or marine paint evaporation during necessary touch ups.

Table 4 below shows the general types of vessels and equipment used for construction related activities. The OCS Air Permit application will include emission estimates with a more detailed list of emission points associated with the Projects that are subject to the OCS Air Permit, including engine sizes, operating hours, load factors, and emission factors used in the analysis.

Table 4: General Vessel and Equipment Types Used for Construction Activities

Construction Vessels and Equipment
Foundation Installation (FOU)
Bulk Carrier
Tugboats
Service Operation Vessel
Offshore Substation Installation (OSS)
Heavy Lift Vessels
Bubble Curtain Support Vessel (Anchor Handling Tug Supply [AHTS])
Barges
Tugboats
Crew Transfer Vessels
Bubble Curtain Air Compressor Engines
Hydraulic Hammer Power Engine
Scour Protection
Fall Pipe Vessel
Dredger

Table 4 (cont'd): General Vessel and Equipment Types Used for Construction Activities

Inter Array Cable Installation
Cable Installation Vessel
Service Operation Vessel
Cable Burial Vessel
Dredger
Anchor Handling Tug Supply (AHTS)
Fall Pipe Vessel
WTG Installation
Jack-up Vessels
Barges
Motion Compensation System Engines
Tugboat
Service Operation Vessel
Export Cable Installation
Cable Installation Vessels
Support and Jointing Vessel
Dredger
Anchor Handling Tug Supply (AHTS)
Fall Pipe Vessel
Fuel Bunkering
Tugboat
Barge
Motion Compensation System Engine
Stationary Generators
Offshore Substation Commissioning Generators

40 CFR § 55.4(b)(5). Estimate of quantity and type of fuels and raw materials to be used.

Atlantic Shores currently anticipates that combustion engines associated with the Projects will use marine diesel fuel, marine residual fuel, or ultra-low sulfur diesel (ULSD). All non-road engines will meet the federal limit for fuel sulfur of 15 ppm per 40 CFR 80. All vessel engines will meet the required fuel sulfur limit of 1,000 parts per million (ppm) per EPA's regulations and the International Maritime Organization's (IMO's) International Convention for the Prevention of Pollution from Ships (MARPOL) treaty. Estimated fuel use from the Projects is documented in Table 5 below.

Table 5: Project Related Fuel Use

	Fuel Type	Fuel Use
Construction Fuel Use (gallons)		
Year 1	Diesel/Residual Fuel Oil	5,275,000
Year 2	Diesel/Residual Fuel Oil	24,957,000
Project 1 and 2 Combined Total	Diesel/Residual Fuel Oil	30,232,000
Operations and Maintenance (gallons/year)		
Project 1 and 2 Combined Total	Diesel/Residual Fuel Oil	2,266,000

40 CFR § 55.4(b)(6). Description of proposed air pollution control equipment.

The Projects will result in a significant net decrease in harmful air pollutant emissions region-wide, and Atlantic Shores is committed to avoiding, minimizing, and mitigating the effects of those air emissions that could occur. This commitment includes the environmental protection measures outlined below.

Atlantic Shores will use engines manufactured and installed to meet or exceed applicable emission control requirements under EPA regulations. Engine manufacturers incorporate pollution control measures into their designs. Techniques used by engine manufacturers include: ensuring complete combustion in the engines, by control of the combustion air, controlling fuel flow, ensuring complete mixing, and staging combustion; avoiding hot spots in the combustion process that can form NO_x, by staging combustion, injecting water, recirculating flue gas, and otherwise cooling the system; and using post-combustion controls to remove air pollutants after they have formed, by adding particulate filters, oxidation catalysts, and selective catalytic reduction systems.

Vessel engines will use a combination of combustion and post-combustion controls to meet or exceed applicable marine engine standards, including: MARPOL Annex VI (for foreign vessels); 40 C.F.R. Part 89 (for Tier 1 and 2 domestic marine diesel engines smaller than 37 kW); Control of Emissions from Marine Compression-Ignition Engines; 40 C.F.R. Part 94 (for Tier 1 and 2 domestic marine diesel engines larger than 37 kW); and Control of Emissions from New and In-Use Marine Compression-Ignition Engines and Vessels, 40 C.F.R. Part 1042 (for Tier 3 and 4 domestic marine diesel engines). On-road engines, nonroad engines, and aircraft engines will meet or exceed similar standards.

40 CFR § 55.4(b)(7). Proposed limitations on source operations or any work practice standards affecting emissions.

The Projects will minimize air emissions, specifically SO_2 and PM, through the use of clean, low sulfur fuels to the maximum extent practicable. Marine diesel fuel will comply with the fuel sulfur limit of 15 ppm per 40 CFR Part 80, which is the same limit as onshore ULSD. For heavier residual fuel oils used in Category 2 and Category 3 engines, and for engines on foreign vessels, the Projects will comply with the fuel oil sulfur content limit of 1,000 ppm set in MARPOL VI and corresponding EPA regulations. Nonroad engines will use ULSD. The use of clean fuels will minimize emissions from fuel impurities and allow for cleaner combustion.

The best engines commercially available for the task will be used. Atlantic Shores will endeavor to minimize air emissions by using the cleanest vessel engines available for the task (i.e., meeting the safety, efficacy, scheduling, and contracting needs for the task). Construction vessels will be supplied by contractors for temporary use on each Project. For routine O&M, Atlantic Shores will have additional ability to specify the vessel(s) used, through long-term contracting or purchase. Atlantic Shores is actively evaluating opportunities to use liquefied natural gas (LNG) or hydrogen as the primary fuel for the main CTVs or SOV to be used for routine O&M. Regardless of whether these technologies are practicable, the primary CTV or SOV to be used for O&M will likely be newly built and will meet top-Tier EPA marine engine standards for new construction. Nonroad engine emissions will be minimized using engines that comply with applicable requirements under 40 CFR Part 1039, Control of Emissions from New and In-Use Nonroad Compression-Ignition Engines, i.e., “Tier 4” engines, where practicable.

During each of the Projects’ phases, Atlantic Shores will implement best management practices (BMPs) and evaluate the use of innovative tools and/or technologies to minimize air emissions from vessel operations. Specifically, Atlantic Shores will optimize construction and O&M activities to minimize vessel operating times and loads. This will include weather monitoring, forecasting, and project tracking to minimize emissions resulting from non-productive time, and incentives for contractor fuel savings. Onshore construction mitigation will also include the development of fugitive dust-control plans for onshore construction areas to minimize effects from fugitive dust emissions from construction activities.

Atlantic Shores will comply with other air-related regulatory requirements by using engines manufactured and maintained in compliance with the appropriate standards, which include NSPS, NESHAPs, and Federal standards for nonroad and marine diesel engines.

40 CFR § 55.4(b)(8). Other information affecting emissions, including, where applicable, information related to stack parameters (including height, diameter, and plume temperature), flow rates, and equipment and facility dimensions.

As described above, the Projects will be located in an approximately 102,124-acre (413.3-km^2) Wind Turbine Area (WTA) located in the southern portion of the Lease Area. Atlantic Shores Project 1 is located in the western 54,175 acres (219.2 km^2) of the WTA and Atlantic Shores Project 2 is located in the eastern 31,847 acres (128.9 km^2) of the WTA, with a 16,102- acre (65.2-km^2) Overlap Area.

The exact vessels and equipment that will be used by the Projects will be confirmed closer to the start of construction. The emission points are vessel, crane, engine, or generator engine exhausts, rather than "stacks" associated with stationary sources. Exhaust parameters will vary depending on the final vessels and equipment used.

40 CFR § 55.4(b)(9). Such other information as may be necessary to determine the applicability of onshore requirements.

Project activities onshore and offshore can be subject to other Federal, state and local air quality requirements. These requirements and their potential applicability are described in the bullets below.

- Internal combustion engines used by the Projects will be subject to Federal New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60, Subpart IIII).

- Internal combustion engines used by the Projects will also be subject to Federal National Emissions Standards for Hazardous Air Pollutants (NESHAPs) standards for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ).

- Nonroad diesel engines and marine diesel engines installed on U.S. vessels are subject to regulations at 40 CFR Part 89, 40 CFR Part 94, and 40 CFR Part 1042.
- Individual stationary sources onshore could be subject to preconstruction permit requirements. This could include the requirement to obtain a general permit for emergency generators firing distillate fuels (GP-005A).
- EPA recently published public notice of a proposed rule to complete a consistency update of New Jersey air quality regulations for the NOI process under 40 CFR § 55.4. See *Outer Continental Shelf Air Regulations Update to Include New Jersey Air Requirements*, 86 Fed. Reg. 66505-66509 (November 23, 2021). The public comment period on the proposed rule closes on December 23, 2021. Assuming that the proposed rule is adopted as final, the New Jersey Air Regulations will be

incorporated by reference into the analysis required by 40 CFR Part 55 where the State of New Jersey is the COA.

40 CFR § 55.4(b)(10). Such other information as may be necessary to determine the source's impact in onshore areas.

As described above, Atlantic Shores is committed to avoiding, minimizing, and mitigating the effects of air emissions that could occur. Atlantic Shores is employing several measures to minimize emissions including, but not limited to, the use of clean fuels, the use of engines manufactured and installed to meet or exceed emission control requirements, and the use of vessel engines that include a combination of combustion and post-combustion controls to meet or exceed applicable marine engine standards.

Construction emissions from the Projects will be temporary, occurring within a defined construction period. Operational emissions from the Projects will account for a very small fraction of total emissions from marine vessel traffic in the region. The Projects as a whole will have a significant net air emissions benefit as demonstrated by the avoided emissions described in Table 3 above.

* * * * *

If you have any comments, questions, or concerns regarding this NOI, please contact Nick DeFilippo at 978-461-6250 or ndefilippo@epsilonassociates.com

Sincerely,

EPSILON ASSOCIATES, INC.

Nick DeFilippo
Project Engineer

CC:
Paul Phifer, Atlantic Shores Offshore Wind
Danny Wong, New Jersey Department of Environmental Protection
Jared Snyder, New York State Department of Environmental Conservation
Angela Marconi, Delaware Department of Natural Resources and Environmental Control
Mark Hammond, Pennsylvania Department of Environmental Protection