Message

From: Wortman, Eric [Wortman.Eric@epa.gov]
Sent: 12/20/2021 2:59:53 PM
To: ROSOD@orsted.com
CC: Bird, Patrick [Bird.Patrick@epa.gov]; Kipka, Undine [kipka.undine@epa.gov]
Subject: South Fork Windfarm - Request for Clarifying Information on EPA's Air Permit

Rob,

EPA is responding to the comments submitted by South Fork Wind, LLC (SFW) on August 9, 2021 (re: the initial draft permit proposed Jun. 24 – Aug. 9, 2021) and December 6, 2021 (re: the revised draft permit proposed Oct. 20 – Dec. 6, 2021). In order to accurately respond to all the comments and finalize EPA's permit decision for the South Fork Windfarm, I am requesting additional information regarding the generator engines proposed for use on the Wind Turbine Generators (WTGs) and Offshore Substation (OSS). Please provide the requested information below as it pertains to the proposed South Fork Windfarm project. Let me know if you have any questions. Thank you. – Eric

1. Please explain how "shore power" from the grid is used to support the operational phase of the project, and implications to the projects operations if shore power from the grid becomes unavailable.

2. EPA understands that additional information may be available regarding anticipated engine use that was not available previously in the permitting process. Please indicate the circumstances where generator engines will be located on the WTGs. Please clarify if the generators will be used during the "operational" or "construction phase" of the project (as those terms are defined in the permit), and the proposed duration and purpose of engine use.

3. The permit application and supporting information does not clearly specify if the engines proposed for installation on the WTGs will be classified as emergency engines or non-emergency engines, as defined in 40 CFR part 60, subpart IIII. Please clarify the intended use for the diesel-fired generator engines proposed for installation on the WTGs.

4. The permit application and supporting information does not clearly specify if the engine proposed for installation on the OSS will be classified as an emergency engine or non-emergency engine, as defined in 40 CFR part 60, subpart IIII. Please clarify the intended use for the diesel-fired generator engine proposed for installation on the OSS.

5. The draft permit contains a requirement limiting the operation of the generator engines on the WTGs and OSS to 200 hours per year. EPA understands the generator engines were modeled to show compliance with the 1-hour NO2 NAAQS assuming an operating scenario of 200 hours per engine at each WTG and OSS location. Please confirm and clarify if necessary.

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