

September 23, 2009

David B. Conroy
Manager, Air Programs Branch
United States Environmental Protection Agency
Region 1 Headquarters
One Congress Street, Suite 1100
Boston, MA 02114-2023

**Re: *Revised Emissions Estimates
Outer Continental Shelf Air Regulations Permit Application
Cape Wind Energy Project***

Dear Mr. Conroy:

A Permit Application for the proposed Cape Wind Offshore Renewable Energy Project (the Project) was submitted by ESS Group, Inc. (ESS) on December 17, 2008 to fulfill the regulatory requirements of the United States Environmental Protection Agency's (EPA) Outer Continental Shelf (OCS) Air Regulations, codified under Title 40 Code of Federal Regulations, Part 55 (40 CFR § 55). The Project, as proposed by Cape Wind Associates, LLC (Cape Wind), will be located at Horseshoe Shoal, Nantucket Sound, Massachusetts, and will utilize offshore wind energy as its renewable fuel to generate electricity for sale.

ESS has prepared revised emissions estimates for the equipment associated with the construction and operation of the Project. The emission estimates were revised at the direction of the EPA and the Minerals Management Service (MMS) during conference calls held on July 16 and July 29, 2009. The emissions estimated were revised in accordance with the EPA's "Current Methodologies in Preparing Mobile Source Port-Related Emissions Inventories – Final Report", dated April 2009 (EPA Port Study).

Attached is a memorandum to EPA and MMS, dated July 30, 2009, which details the specific revisions made to the emissions estimates, including revised versions of the spreadsheets used to estimate the emissions for each phase of the project subject to OCS permitting, which were included in Appendix A of the Project's OCS Permit Application. Also attached is a revised version of Table 1-1 from the Project's OCS Permit Application. It summarizes the Project's revised potential emissions during preconstruction, construction, and operation from vessels in transit and from stationary sources that will occur inside 25 miles of the Project site. Table 1-1 also includes revised proposed annual emission limits for Phase 1 (preconstruction and construction) and Phase 2 (operation) of the Project. Finally, Table 1-1 summarizes the revised emission offset requirements for Phase 1 of the Project.

The revised emission estimates for the phases of the Cape Wind Energy Project subject to OCS permitting have been done on a consistent basis, at the direction of EPA and MMS, using the most up to date EPA guidance for such estimations. If you have any questions regarding this submittal, do not hesitate to call me at (781) 489-1149.

Engineers
Scientists
Consultants

Sincerely,

ESS GROUP, INC.



Michael E. Feinblatt
Project Manager

Attachments

- C: Ida McDonnell, EPA
- Karen Regas, MassDEP
- Craig Olmsted, Cape Wind Associates
- Rachel Pachter, Cape Wind Associates
- Chris Rein, ESS
- Terry Orr, ESS

Table 1-1
Cape Wind Energy Project
Project Emissions Subject to OCS Permitting - Revised July 2009

PHASE 1 - PRECONSTRUCTION & CONSTRUCTION										
Potential Emissions	Total Emissions (Tons)									
	NO _x	VOC	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPS		
Preconstruction Potential Emissions - Total	6.0	0.4	0.0	4.1	0.3	0.3	366	0.0		
Inside 25 Miles - Transit	5.8	0.3	0.0	3.9	0.3	0.3	325	0.0		
Inside 25 Miles - Stationary Sources	0.2	0.1	0.0	0.2	0.0	0.0	41	0.0		
Construction Potential Emissions - Total	187.2	7.9	2.1	24.6	7.0	6.5	10,510	0.1		
Inside 25 Miles - Transit	172.6	6.3	2.1	16.0	6.5	6.0	8,778	0.1		
Inside 25 Miles - Stationary Sources	14.6	1.6	0.0	8.6	0.5	0.5	1,732	0.0		
Potential Emissions - Total	193.2	8.3	2.1	28.7	7.3	6.8	10,876	0.1		
Inside 25 Miles - Transit	178.4	6.6	2.1	19.9	6.8	6.3	9,103	0.1		
Inside 25 Miles - Stationary Sources	14.8	1.7	0.0	8.8	0.5	0.5	1,773	0.0		
Proposed Annual Emission Limits										
Phase 1 - Year 1 (Preconstruction + 70% Construction)	137.04	5.93	1.47	21.32	5.20	4.85	7,723	0.07		
Phase 1 - Year 2 (30% Construction)	56.16	2.37	0.63	7.38	2.10	1.95	3,153	0.03		
Emissions Offsets										
Phase 1 - Year 1 Emissions Offsets (1.26:1 Offset Ratio)	173	0	0	0	0	0	0	0		
Phase 1 - Year 2 Emissions Offsets (1.26:1 Offset Ratio)	71	0	0	0	0	0	0	0		
PHASE 2 - OPERATION										
Potential Emissions	Annual Emissions (Tons Per Year)									
	NO _x	VOC	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPS		
Potential Emissions - Total	13.0	0.8	0.0	9.6	0.7	0.6	688	0.0		
Inside 25 Miles - Transit	13.0	0.8	0.0	9.6	0.7	0.6	688	0.0		
Inside 25 Miles - Stationary Sources	0.0	0.0	0.0	0.0	0.0	0.0	0	0.0		
Proposed Annual Emission Limits (Note 7)										
Phase 2 - 12-month rolling total	49.9	3.1	0.0	36.8	2.7	2.3	2,641	0.0		

Notes

- 1) Project emissions have been estimated using conservative equipment usage assumptions and EPA approved emission factors. The operating hours of all equipment used will be metered to track actual emissions.
- 2) The NO_x, VOC, SO₂, PM₁₀, PM_{2.5} and CO₂ emissions from all vessels equipped with diesel engines have been estimated at the direction of the EPA and MMS using the appropriate emission factors and load factors from EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories, Final Report", April 2009. The HAP emissions from these vessels have been estimated using AP-42 emission factors for diesel engines. The total engine power output estimated for each vessel has been increased by 10% to account for emissions from auxiliary engines.
- 3) The NO_x, CO, PM₁₀, and PM_{2.5} emissions from all of the stationary nonroad diesel-fired engines to be used for the project have been estimated using the Tier 2 (or Tier 3 if available) emission standards from 40 CFR 89.112, Table 1 for each engine size. Additional CO and PM emissions control will be achieved through the use of diesel oxidation catalysts (DOC) on all project stationary source diesel engines.
- 4) The VOC, SO₂, CO₂, and HAP emissions from all of the stationary nonroad diesel-fired engines to be used for the project have been estimated using the appropriate emission factors from EPA's AP-42, "Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources". Additional VOC and HAP emissions control will be achieved through the use of DOC on all project stationary source diesel engines.
- 5) The SO₂ emissions from all of the diesel-fired non-road engines to be used for the project have been estimated assuming a diesel fuel sulfur content of 15 ppm, which will be the fuel sulfur content standard for all nonroad diesel fuel beginning June 1, 2010. The SO₂ emissions from all diesel-fired marine engines used for preconstruction and construction activities have been estimated assuming a diesel fuel sulfur content of 500 ppm, which is the current marine diesel fuel sulfur content standard. The SO₂ emissions from all diesel-fired marine engines used during operation have been estimated assuming a diesel fuel sulfur content of 15 ppm, which will be the marine diesel fuel sulfur content standard beginning June 1, 2012. The EPA's non-road and marine diesel sulfur content standards can be found at 40 CFR 80.510.
- 6) The emissions from the zodiac boats to be used for the project have been estimated using worst-case emission factors from the EPA document: "Exhaust Emission Factors for Nonroad Engine Modelling: Spark-Ignition", EPA420-R-05-019, Table 10.
- 7) The Project will be permitted for up to 49.9 tons per year of NO_x emissions during Phase 2, to include a contingency for unexpected equipment maintenance and/or repair activities, while remaining a minor source of emissions. The proposed permit limits of the other pollutants have been determined by scaling their individual potential emissions by the ratio of the permitted versus potential NO_x emissions.

MEMORANDUM

TO: Bob McConnell, EPA
Dirk Herkhof, MMS

DATE: July 30, 2009

FROM: Mike Feinblatt

SUBJECT: Revised Cape Wind Emissions Estimates – Methodology

PROJECT NO.: E159-504.1

COPY TO: Chris Rein, ESS
Rachel Pachter & Craig Olmsted, Cape Wind

ESS Group, Inc. (ESS) has prepared revised emissions estimates for the equipment associated with the construction and operation of the Cape Wind Energy Project. The emission estimates were revised at the direction of the U.S. Environmental Protection Agency (EPA) and the Minerals Management Service (MMS) during the July 16 and July 29, 2009 conference calls regarding the June 2009 emissions estimates for the project.

The emissions from all diesel powered vessels associated with the project have been estimated in accordance with the EPA's "Current Methodologies in Preparing Mobile Source Port-Related Emissions Inventories – Final Report", April 2009. The emissions estimates have been further revised to address the specific comments made by EPA and MMS during the July 16 and July 29 calls.

The following sections describe the specific revisions made to the June 2009 emissions estimates, at the direction of EPA and MMS.

Load Factors

In the June 2009 emissions estimates, reference EPA load factors from Table 3-3 of the EPA Port Study were used for all harbor craft associated with the project. The June 2009 emission estimates utilized a load factor of 0.83 for all ocean going vessels except for tow tugs. A load factor of 0.17 was utilized for ocean going tow tugs, as determined using the Propeller Law.

At the direction of EPA and MMS, Table 3-4 of the EPA Port Study, which presents actual load factors for specified vessels from an emissions inventory conducted at the Port of Los Angeles and Long Beach, has been used for the revised emissions estimates. Table 3-4 recommends a load factor of 0.68 for ocean tugs, which is significantly higher than the 0.17 load factor which had previously been determined using the Propeller Law. This difference is reflective of the fact that a significant percentage of the power of the ocean tug propulsion engine will actually be used to push or pull another vessel, and not for propulsion.

Based on the guidance provided by the EPA Port Study, and at the further direction of EPA and MMS, load factors have been revised and applied to each of the project vessels as follows:

Vessel Category	Engine Size	Load Factor
OG Vessels	>3,000 kW	0.83
Crane Barges	>3,000 kW	0.83



Ocean Tugs	>3,000 kW	0.68
Crew Boats	<3,000 kW	0.45
Work Boats	<3,000 kW	0.43
Crane Barges	<3,000 kW	0.43
Tugboats	<3,000 kW	0.31

Auxiliary Engine Emissions

Previous project vessel emissions estimates have not considered emissions from auxiliary engines, because of the uncertainty in the actual vessels to be used, and the level of conservatism built into the emissions estimates. At the direction of EPA and MMS, the project emission estimates have been revised to include the potential for emissions from auxiliary engines on project vessels.

Table 3-10 of the EPA Port Study presents the average number of engines, engine power, and annual operating hours for the main engines and auxiliary engines for different vessel types determined from the Port of Los Angeles, Long Beach, and Puget Sound emissions inventories. According to Table 3-10, the auxiliary engine annual kilowatt-hour power output (number of engines x engine power x annual operating hours) represented approximately 7.9% of the annual main engine power output for work boats, and approximately 7.3%, 5.4%, and 6.8% of the annual main engine power output for assist tugs, harbor tugs, and ocean tugs, respectively.

Based on the information provided in the EPA Port Study, and at the direction of EPA and MMS, each of the project vessel engine kilowatt-hour power outputs, and resulting emissions estimates have been increased by 10%, to conservatively account for emissions from the operation of auxiliary engines on the vessels during project activities.

Trip Durations

Previous project vessel emissions estimates have very conservatively estimated the duration of vessel trips to and from the 25-mile boundary, and from the 25-mile boundary to the project site. At the direction of EPA and MMS, the estimates of the duration of such project vessel transit trips have been revised assuming a travel speed of 8 knots, as follows:

Transit Trip	Total Distance	Trip Duration
Quonset Point to/from 25-mile boundary	34.9 miles	34.9/8 = 4.3625 hrs
25-mile boundary to/from site	25 miles	25/8 = 3.125 hrs
Quonset Point to/from RI Border	19 miles	19/8 = 2.375 hrs
MA Border to/from 25-mile boundary	7.3 miles	7.3/8 = 0.9125 hrs

Diesel Fuel Sulfur Content

In the previous emissions estimates, the sulfur content of the diesel fuel for all vessels was assumed to be 500 ppm, which is the current sulfur content standard for marine diesel fuel. The sulfur content standard for marine diesel fuel will become 15 ppm beginning June 1, 2012, in accordance with 40 CFR 80.510(c). For this purpose, it is conservatively estimated that construction will be completed by that date; therefore the assumed sulfur content for marine diesel fuel remains 500 ppm for preconstruction and construction vessels. However, in anticipation of the 2012 change in the marine diesel sulfur standard, the assumed sulfur content for marine diesel fuel has been revised to 15 ppm for vessels to be used during operation.

The current sulfur content standard for nonroad diesel fuel is 500 ppm. The sulfur content standard for nonroad diesel fuel will become 15 ppm beginning June 1, 2010, in accordance with 40 CFR 80.510(b). Since construction activities will not be completed by June 1, 2010, the assumed sulfur content for nonroad diesel fuel has been revised to 15 ppm for all stationary sources equipped with diesel engines associated with the project.

Conclusion

Attached are the revised versions of the individual spreadsheets that were used to estimate the emissions from the project based on additional direction from MMS and EPA during the July 16 and July 29 conference calls. Also attached is a table summarizing the revised estimated project emissions for all phases and activities. These revised emission estimates for each of the phases and activities associated with the Cape Wind Energy Project have been done on a consistent basis, at the direction of EPA and MMS, using the most up to date EPA guidance for such estimations.

Please review the attached revised estimation of the project emissions, which should now be considered final. Please call me at (781) 489-1149 if you have any questions. Thank you for your assistance in this effort.

Cape Wind Energy Project
Estimated Project Emissions - Revised July 2009

Preconstruction & Construction Emissions	Total Emissions (Tons)							
	NO _x	VOC	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPS
Total	497.1	28.0	8.1	133.2	20.2	18.1	26,870	0.3
OCS Permit Emissions	193.2	8.3	2.1	28.7	7.3	6.8	10,876	0.1
Pre-Construction - Inside 25 Miles - Transit	5.8	0.3	0.0	3.9	0.3	0.3	325	0.0
Pre-Construction - Inside 25 Miles - Stationary Sources	0.2	0.1	0.0	0.2	0.0	0.0	41	0.0
Construction - Inside 25 Miles - Transit	172.6	6.3	2.1	16.0	6.5	6.0	8,778	0.1
Construction - Inside 25 Miles - Stationary Sources	14.6	1.6	0.0	8.6	0.5	0.5	1,732	0.0
Year 1 - Preconstruction + 70% Construction	137.04	5.93	1.47	21.32	5.20	4.85	7,723	0.07
Year 2 - 30% Construction	56.16	2.37	0.63	7.38	2.10	1.95	3,153	0.03
Conformity Emissions	259.7	18.0	5.4	100.7	11.3	9.8	13,827	0.1
Construction - Onshore Activities - RI	101.3	4.7	1.2	20.1	3.8	3.6	5,511	0.1
Construction - Onshore Activities - MA	23.0	8.2	2.1	69.4	2.7	1.8	1,689	0.0
Construction - Outside 25 Miles - Transit in RI Waters	97.8	3.7	1.5	8.1	3.5	3.2	4,788	0.0
Construction - Outside 25 Miles - Transit in MA Waters	37.6	1.4	0.6	3.1	1.3	1.2	1,839	0.0
Year 1 - 70% Construction	181.82	12.59	3.78	70.47	7.89	6.83	9,679	0.07
Year 2 - 30% Construction	77.92	5.39	1.62	30.20	3.38	2.93	4,148	0.03
Other Emissions								
Construction - Outside 25 Miles - Transit in Federal Waters	44.2	1.7	0.6	3.8	1.6	1.5	2,167	0.1

Construction Phase Emissions Offsets Required	Total ERCs (Tons Per Year)							
	NO _x	VOC	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPS
OCS Permit (1.26:1 Offset Ratio, see Note 12) - Year 1	173	0	0	0	0	0	0	0
OCS Permit (1.26:1 Offset Ratio, see Note 12) - Year 2	71	0	0	0	0	0	0	0
RI Conformity (1:1 Offset Ratio) - Year 1	139	0	0	0	0	0	0	0
RI Conformity (1:1 Offset Ratio) - Year 2	60	0	0	0	0	0	0	0
MA Conformity (1:1 Offset Ratio) - Year 1	42	0	0	0	0	0	0	0
MA Conformity (1:1 Offset Ratio) - Year 2	18	0	0	0	0	0	0	0

Operation Emissions	Annual Emissions (Tons Per Year)							
	NO _x	VOC	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPS
Total	13.3	0.8	0.0	9.6	0.7	0.6	704	0.0
OCS Permit Emissions	13.0	0.8	0.0	9.6	0.7	0.6	688	0.0
Inside 25 Miles - Transit	13.0	0.8	0.0	9.6	0.7	0.6	688	0.0
Inside 25 Miles - Stationary Sources	0.0	0.0	0.0	0.0	0.0	0.0	0	0.0
Conformity Emissions	0.3	0.0	0.0	0.0	0.0	0.0	16	0.0
Outside 25 Miles - Transit in RI Waters	0.0	0.0	0.0	0.0	0.0	0.0	0	0.0
Outside 25 Miles - Transit in MA Waters	0.3	0.0	0.0	0.0	0.0	0.0	16	0.0
Other Emissions								
Outside 25 Miles - Transit in Federal Waters	0.0	0.0	0.0	0.0	0.0	0.0	0	0.0

Notes

- Project emissions have been estimated using conservative equipment usage assumptions and EPA approved emission factors. The operating hours of all equipment used will be metered to track actual emissions.
- The NO_x, VOC, SO₂, PM₁₀, PM_{2.5}, and CO₂ emissions from all vessels equipped with diesel engines have been estimated at the direction of the EPA and MMS using the appropriate emission factors and load factors from EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories, Final Report", April 2009. The HAP emissions from these vessels have been estimated using AP-42 emission factors for diesel engines. The total engine power output estimated for each vessel has been increased by 10% to account for emissions from auxiliary engines.
- The NO_x, CO, PM₁₀, and PM_{2.5} emissions from all of the stationary nonroad diesel-fired engines to be used for the project have been estimated using the Tier 2 (or Tier 3 if available) emission standards from 40 CFR 89.112, Table 1 for each engine size. Additional CO and PM emissions control will be achieved through the use of diesel oxidation catalysts (DOC) on all project stationary source diesel engines.
- The VOC, SO₂, CO₂, and HAP emissions from all of the stationary nonroad diesel-fired engines to be used for the project have been estimated using the appropriate emission factors from EPA's AP-42, "Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources". Additional VOC and HAP emissions control will be achieved through the use of DOC on all project stationary source diesel engines.
- The SO₂ emissions from all of the diesel-fired non-road engines to be used for the project have been estimated assuming a diesel fuel sulfur content of 15 ppm, which will be the fuel sulfur content standard for all nonroad diesel fuel beginning June 1, 2010. The SO₂ emissions from all diesel-fired marine engines used for preconstruction and construction activities have been estimated assuming a diesel fuel sulfur content of 500 ppm, which is the current marine diesel fuel sulfur content standard. The SO₂ emissions from all diesel-fired marine engines used during operation have been estimated assuming a diesel fuel sulfur content of 15 ppm, which will be the marine diesel fuel sulfur content standard beginning June 1, 2012. The EPA's non-road and marine diesel sulfur content standards can be found at 40 CFR 80.510.
- The emissions from the zodiac boats to be used for the project have been estimated using worst-case emission factors from the EPA document: "Exhaust Emission Factors for Nonroad Engine Modeling: Spark-Ignition", EPA420-R-05-019, Table 10.
- The transit emissions from vessels outside 25 miles have been segregated by jurisdiction by proportioning the estimated total transit time for each vessel based on an average assumed speed of 8 knots and the number of nautical miles traveled within each jurisdiction during each trip.
- All emissions resulting from staging activities in Rhode Island during the construction period have been estimated assuming approximately 8-hours of crane operations required for unloading, staging, and unloading of materials for each vessel trip identified.
- Emissions from onshore construction equipment have been estimated using emission factors from EPA's Nonroad Engine Model Guidance Document, EPA420-P-04-009.
- Emissions from vehicles associated with onshore construction and port activities have been estimated using emission factors from EPA's MOBILE6 Vehicle Model Guidance Document, EPA420-F-05-022.
- Fugitive emissions resulting from onshore construction activities have been estimated using emission factors from the Mid-Atlantic Regional Air Management Association's (MARAMA) Fugitive Dust-Construction Calculation Sheet.
- MassDEP nonattainment rules require an offset ratio of at least 1.2:1. According to Massachusetts ERC Bank Rules, if ERCs are to be used as offsets, an amount of credit equal to five percent more than the amount needed for the offset calculation must be purchased to ensure progress towards attainment, and for the benefit of the environment, resulting in an overall 1.26:1 offset ratio.
- Emissions from onshore activities in RI include an estimate of emissions from ship deliveries of parts and materials to the port at Quonset Point. It has been assumed that all parts and materials will be transported to the port by ship for this analysis.

Emission Factors from EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009
Emission Factors - Ocean going Vessel Main Engine, Medium-Speed Diesel, Marine Diesel Oil, g/KWh (Table 2-3)

MSD & MDO	NOx	VOC (HC)	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs
18.2	0.30	0.20	1.10	0.47	0.43	0.0635		

Engine Power	NOx	VOC (HC)	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs
225-449 KW (Cat. 1)	10.0	0.27	0.93	1.50	0.30	0.29	690.00	0.0761
450-899 KW (Cat. 1)	10.0	0.27	0.93	1.50	0.30	0.29	690.00	0.0761
900-1399 KW (Cat. 1)	10.0	0.27	0.93	1.50	0.30	0.29	690.00	0.0761
1400-2000 KW (Cat. 2)	13.0	0.35	1.10	1.72	0.30	0.29	690.00	0.09635
2000-3000 KW (Cat. 2)	15.0	0.43	1.10	1.72	0.30	0.29	690.00	0.09635

Category 2 vessels are defined by EPA as non-harbor craft vessels propulsion (<1500 KW)
Category 3 vessels are defined by EPA as OSV propulsion engines (1-3,000 KW)

HAP emission factors are from AP-42 (Sections 3.3 & 3.4)

Load Factors are from Table 3-4 of the EPA Port Emissions Guidance Document

Emission Factors (g/hr-hr) Diesel Recip. <600 hp Based on AP-42 Vol.1, Tables 3.3.1-3.3.2

Engine Size	NOx	VOC	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs
225-449 kW	4.0	1.14	0.01	0.01	0.01	0.01	321.63	0.012

* EPA emission standard is for NOx+HHC. It has been assumed that all emissions are NOx to be conservative.

Emission Factors (lb/MMBtu) Natural Gas 4-Stroke Based on AP-42 Vol.1, Table 3.2-2

Engine Size	NOx	VOC	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs
Gas Fired	0.85	0.00077	0.00077	0.00077	0.00077	0.00077	0.00077	0.00077

NOx emission factors are based on EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009
Emission Factors (g/hr-hr) Diesel Recip. <600 hp Based on AP-42 Vol.1, Tables 3.3.1-3.3.2

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NOx emission factors are based on EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009
Emission Factors (g/hr-hr) Diesel Recip. <600 hp Based on AP-42 Vol.1, Tables 3.3.1-3.3.2

NOx emission factors are based on EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009
Emission Factors (g/hr-hr) Diesel Recip. <600 hp Based on AP-42 Vol.1, Tables 3.3.1-3.3.2

NOx emission factors are based on EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009
Emission Factors (g/hr-hr) Diesel Recip. <600 hp Based on AP-42 Vol.1, Tables 3.3.1-3.3.2

NOx emission factors are based on EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009
Emission Factors (g/hr-hr) Diesel Recip. <600 hp Based on AP-42 Vol.1, Tables 3.3.1-3.3.2

NOx emission factors are based on EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009
Emission Factors (g/hr-hr) Diesel Recip. <600 hp Based on AP-42 Vol.1, Tables 3.3.1-3.3.2

NOx emission factors are based on EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009
Emission Factors (g/hr-hr) Diesel Recip. <600 hp Based on AP-42 Vol.1, Tables 3.3.1-3.3.2

NOx emission factors are based on EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009
Emission Factors (g/hr-hr) Diesel Recip. <600 hp Based on AP-42 Vol.1, Tables 3.3.1-3.3.2

NOx emission factors are based on EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009
Emission Factors (g/hr-hr) Diesel Recip. <600 hp Based on AP-42 Vol.1, Tables 3.3.1-3.3.2

NOx emission factors are based on EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009
Emission Factors (g/hr-hr) Diesel Recip. <600 hp Based on AP-42 Vol.1, Tables 3.3.1-3.3.2

NOx emission factors are based on EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009
Emission Factors (g/hr-hr) Diesel Recip. <600 hp Based on AP-42 Vol.1, Tables 3.3.1-3.3.2

NOx emission factors are based on EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009
Emission Factors (g/hr-hr) Diesel Recip. <600 hp Based on AP-42 Vol.1, Tables 3.3.1-3.3.2

NOx emission factors are based on EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009
Emission Factors (g/hr-hr) Diesel Recip. <600 hp Based on AP-42 Vol.1, Tables 3.3.1-3.3.2

NOx emission factors are based on EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009
Emission Factors (g/hr-hr) Diesel Recip. <600 hp Based on AP-42 Vol.1, Tables 3.3.1-3.3.2

Diesel Fuel Sulfur Content: 500 ppm

Diesel Fuel Sulfur Content: 15 ppm

Activity Type	Vessel Type/ Emission Source	Number of Sources	Equipment Size (HP)	Equipment Size (kW)	Activity	Count	Duration	Operating Hours (per unit)	Assumptions	Load Factor	Auxiliary Engine Power Adjustment	NOx	VOC	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs													
Preconstruction Period - Activities within 25 Miles of the Project																																
Geophysical - WTG's	42' Diesel Lobster Boat	1	1,000	746	-Travel b/w Falmouth and WP - 30 miles of traverse	6 days	10 hrs/day	60	- 2 hrs. @ 15 knots then 8 hrs. @ 3 knots	0.43	1.100	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0												
Geophysical - 33 KV Inner Array Cable	42' Diesel Lobster Boat	1	1,000	746	-Travel b/w Falmouth and WP - 30 miles of traverse	20 days	10 hrs/day	200	- 2 hrs. @ 15 knots then 8 hrs. @ 3 knots	0.43	1.100	0.8	0.0	0.0	0.1	0.0	0.0	53.6	0.0	0.0												
Geophysical - 115 KV Interconnect Cable	42' Diesel Lobster Boat	1	1,000	746	-Travel b/w Falmouth and WP - 30 miles of traverse	7 days	10 hrs/day	70	- 2 hrs. @ 15 knots then 8 hrs. @ 3 knots	0.43	1.100	0.3	0.0	0.0	0.0	0.0	0.0	18.9	0.0	0.0												
Electrical Generator	Gas Fired	1	6.7	6.5		30 days	10 hrs/day	300	Full Load @ 1hr/day			0.000	0.001	0.000	0.005	0.000	0.000	1.007	0.001	0.001												
Borings	Tug Boat	1	1,500	1,119	Travel b/w Falmouth and WP	30 days	24 hrs/day	720		0.31	1.100	4.0	0.3	0.0	0.3	0.2	0.2	208.7	0.0	0.0												
Boring Drill Rig	Truck-mounted Rig	1	350	261	1 boring/day	20 days	10 hr/day	200	Rig Stays on HSS till done			0.2	0.1	0.0	0.2	0.0	0.0	40.2	0.0	0.0												
Vibracore Boat		1	1,000	746	Final Cable Design and Constructability survey	8 days	10 hr/day	80	- 33 KV: 1 core/3 miles of cable, total 22 - 115 KV: 2 mile of cable, total 28 - 6 /day	0.43	1.100	0.3	0.0	0.0	0.0	0.0	0.0	21.4	0.0	0.0												
Multibeam Survey	26' Boat	1	300	224	Shallow area multibeam survey	8 days	10 hr/day	80		0.43	1.100	0.1	0.0	0.0	0.0	0.0	0.0	6.4	0.0	0.0												
Electrical Generator	Gas Fired	1	4	3		6 days	10 hr/day	60				0.001	0.000	0.000	0.001	0.000	0.001	0.121	0.000	0.000												
Crew Movement	Zodiac Boat	1	100	75	1 boring/day	20 days	10 hr/day	200	Zodiac only needed for boring operation			0.1	0.1	0.1	0.4	0.001	0.001	3.4	0.001	0.001												
Preconstruction Emissions - Stationary Sources												0.2	0.1	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0		
Preconstruction Emissions - Transit												5.8	0.3	0.0	3.9	0.3	0.3	3.25	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Preconstruction Emissions												6.0	0.4	0.0	4.1	0.3	0.3	3.66	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

All operating hours will be metered to track actual emissions.

Note: All trips are one-way (not round trips).

Emission Factors from EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009

Emission Factors - Ocean Going Vessel Main Engines, Medium-Speed Diesel, Marine Diesel Oil, g/kWh (Table 2-9)

Engine	NOx	VOC (HC)	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs
MSD & MDO	13.2	0.50	0.20	1.10	0.47	0.43	646.08	0.00635
Emission Factors - Harbor Craft, Tier 0, g/kWh (Table 3-8)								
Engine Power	NOx	VOC (HC)	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs
225 - 448 kW (Cat. 1)	10.0	0.27	0.043	1.50	0.30	0.29	690.00	0.0161
450 - 559 kW (Cat. 1)	10.0	0.27	0.043	1.50	0.30	0.29	690.00	0.0161
560 - 889 kW (Cat. 1)	10.0	0.27	0.043	1.50	0.30	0.29	690.00	0.00635
1,000 - 1,300 kW (Cat. 1)	13.0	0.27	0.043	2.50	0.30	0.29	690.00	0.00635
1,000 - 3,000 kW (Cat. 2)	13.2	0.50	0.043	3.10	0.72	0.70	690.00	0.00635

Category 1 vessels are defined by EPA as small harbor craft and recreational propulsion (<1,000 kW)
 Category 2 vessels are defined by EPA as OGV auxiliary engines, harbor craft, and smaller OGV propulsion (1,000-3,000 kW)
 Category 3 vessels are defined by EPA as OGV propulsion engines (>3,000 kW)

Ocean Going Vessel Load Factors were assumed to be 0.83, consistent with Section 2.5 of the EPA Port Emissions Guidance Document.

HAP emission factors are from AP-42 (Sections 3.3 & 3.4)

Harbor Craft Load Factors are from Table 3.4 of the EPA Port Emissions Guidance Document

Emissions (tons) = Engine Power Rating (kW) X Load Factor (%) X Activity (hrs) X Emission Factor (g/kWh) X (1 lb/454 g) X (1 ton/2000 lb) X (# of sources)

Travel Origin beyond 25 Mile Radius

Assumptions

Operating Hours (per unit)

Duration

Count

Activity

Equipment Size (HP)

Equipment Size (kW)

Number of Sources

Vessel Type/ Emission Source

Activity Type

Construction Period - Transit Activities within 25 Miles of the Project

Travel Origin beyond 25 Mile Radius

Assumptions

Operating Hours (per unit)

Duration

Count

Activity

Equipment Size (HP)

Equipment Size (kW)

Number of Sources

Vessel Type/ Emission Source

Activity Type

Construction Period - Transit Activities within 25 Miles of the Project

Travel Origin beyond 25 Mile Radius

Assumptions

Operating Hours (per unit)

Duration

Count

Activity

Equipment Size (HP)

Equipment Size (kW)

Number of Sources

Vessel Type/ Emission Source

Activity Type

Construction Period - Transit Activities within 25 Miles of the Project

Travel Origin beyond 25 Mile Radius

Assumptions

Operating Hours (per unit)

Duration

Count

Activity

Equipment Size (HP)

Equipment Size (kW)

Number of Sources

Vessel Type/ Emission Source

Activity Type

Construction Period - Transit Activities within 25 Miles of the Project

Diesel Fuel Sulfur Content: 500 ppm

Activity Type	Vessel Type/ Emission Source	Number of Sources	Equipment Size (HP)	Equipment Size (kW)	Activity	Count	Duration	Operating Hours (per unit)	Assumptions	Travel Origin beyond 25 Mile Radius	Load Factor	Auxiliary Engine Power Adjustment	NOx	VOC	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs	
Pile Installation	attendant tug	1	3,000	2,237	Travel b/w 25-mile boundary and WP	4 trips	3	13	This is done twice (once per year)	Quonset Point, RI	0.31	1.100	0.1	0.0	0.0	0.0	0.0	0.0	0.0	77.2	0.0
		1	6,000	4,474	Travel b/w 25-mile boundary and WP	86 trips	3	269	avg. 3 piles per trip, 130 piles, duration only w/in 25 miles	Quonset Point, RI	0.68	1.100	13.1	0.5	0.2	1.1	0.5	0.4	0.0	640.0	0.0
Transport piles and transition pieces to wind park	attendant tug	1	3,000	2,237	Daily activity	130 days	3 hrs/day	390	3 piles per week, attendant tugs only operate equiv of 1/2 day		0.31	1.100	4.3	0.0	0.0	0.4	0.2	0.2	0.0	226.3	0.0
		2	750	559	daily travel b/w Fairmouth and WP	130 days	1	182			0.45	1.100	1.1	0.0	0.0	0.2	0.0	0.0	0.0	76.4	0.0
Transition piece handling tugs @ Wind Park	attendant tug	1	3,000	2,237	Daily activity	130 days	4 hrs/day	520	3 pieces per week, attendant tugs only operate equiv of 1/2 day		0.31	1.100	5.8	0.2	0.0	0.5	0.3	0.3	0.0	301.4	0.0
		1	3,000	2,237	Travel b/w 25-mile boundary and WP	4 trips	3	13	This is done twice (once per year)	Quonset Point, RI	0.31	1.100	0.1	0.0	0.0	0.0	0.0	0.0	0.0	7.2	0.0
Installation of scour protection equipment to Wind Park	tow tug	1	6,000	4,474	Travel b/w 25-mile boundary and WP	276 trips	3	863	Spd. 8 knts	Quonset Point, RI	0.68	1.100	42.0	1.6	0.6	3.5	1.5	1.4	2053.9	0.0	
		1	6,000	4,474	Travel b/w 25-mile boundary and WP	370 trips	3	1,156	Spd. 8 knts	Quonset Point, RI	0.68	1.100	56.3	2.1	0.8	4.7	2.0	1.8	2753.4	0.0	
Armor/filler barge handling tugs @ Wind Park	attendant tugs	2	3,000	2,237	Daily activity	130 days	4 hrs/day	520			0.31	1.100	11.5	0.4	0.0	1.0	0.6	0.6	0.0	602.9	0.0
		Subtotal																			
Cable laying	115 kV Cable laying barge to wind farm	1	1,500	1,119	Travel b/w 25-mile boundary and WP	4 trips	3	13		Quonset Point, RI	0.31	1.100	0.1	0.0	0.0	0.0	0.0	0.0	0.0	3.6	0.0
		1	400	298		15 days	10 hrs/day	150	10 hrs/day for 15 work days		0.43	1.100	0.2	0.0	0.0	0.0	0.0	0.0	0.0	16.1	0.0
Put cable in place	attendant tug	1	1,500	1,119		15 days	10 hrs/day	150	10 hrs/day for 15 work days		0.31	1.100	0.8	0.0	0.0	0.2	0.0	0.0	0.0	43.5	0.0
		1	4,000	2,983		15 days	10 hrs/day	150	10 hrs/day for 15 work days		0.31	1.100	2.2	0.1	0.0	0.2	0.1	0.1	15.9	0.0	
Moving crew in and out	tow tug	1	750	559		15 days	2 hrs/day	30	13 round trips	Quonset Point, RI	0.43	1.100	0.4	0.0	0.0	0.1	0.0	0.0	0.0	6.3	0.0
		1	1,500	1,119	Travel b/w 25-mile boundary and WP	26 trips	3	81		Quonset Point, RI	0.31	1.100	0.4	0.0	0.0	0.1	0.0	0.0	0.0	23.6	0.0
Put cable in place	crane barge	1	400	298		130 days	10 hrs/day	1300	10 hrs/day for 10 work days/strip - 13 strips		0.43	1.100	2.0	0.1	0.0	0.3	0.1	0.1	139.4	0.0	
		Subtotal																			

Note: All trips are one-way (not round trips).

Emission Factors from EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009

Engine	MSD & MDO	NOx	VOC (HC)	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs
		73.2	0.50	0.20	1.10	0.47	0.43	646.08	0.00635
Emission Factors - Ocean Going Vessel Main Engines, Medium-Speed Diesel, Marine Diesel Oil, g/RWH (Table 2-3)									
		NOx	VOC (HC)	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs
225 - 449 kW (Cat. 1)	10.0	0.27	0.043	1.50	0.30	0.29	0.30	690.00	0.0161
450 - 559 kW (Cat. 1)	10.0	0.27	0.043	1.50	0.30	0.29	0.30	690.00	0.0161
560 - 899 kW (Cat. 1)	10.0	0.27	0.043	1.50	0.30	0.29	0.30	690.00	0.00635
1,000 kW (Cat. 1)	13.0	0.27	0.043	2.50	0.30	0.29	0.30	690.00	0.00635
1,000 - 3,000 kW (Cat. 2)	13.0	0.50	0.043	1.10	0.72	0.70	0.70	690.00	0.00635

Category 1 vessels are defined by EPA as small harbor craft and recreational propulsion (<1,000 kW)
 Category 2 vessels are defined by EPA as OGV auxiliary engines, harbor craft, and smaller OGV propulsion (1,000-3,000 kW)
 Category 3 vessels are defined by EPA as OGV propulsion engines (>3,000 kW)
 HAP emission factors are from AP-42 (Sections 3.3 & 3.4)
 Ocean Going Vessel Load Factors were assumed to be 0.83, consistent with Section 2.5 of the EPA Port Emissions Guidance Document.
 Harbor Craft Load Factors are from Table 3-4 of the EPA Port Emissions Guidance Document

Emissions (tons) = Engine Power Rating (kW) x Load Factor (%) x Activity (hrs) x Emission Factor (g/kWh) x (1 lb/454 g) x (1 ton/2000 lb) x (# of sources)

Activity Type	Vessel Type/ Emission Source	Number of Sources	Equipment Site (HP)	Equipment Size (kW)	Activity	Count	Duration	Operating Hours (per unit)	Assumptions	Travel Origin beyond 25 Mile Radius	Load Factor	Auxiliary Engine Power Adjustment	Emissions (tons)									
													NOx	VOC	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs		
Put cable in place	attendant tug	1	1,500	1,119	Travel b/w 25-mile boundary and WP	130 days	10 hrs/day	1300	10 hrs/day for 10 work days/string - 13 strings	Quonset Point, RI	0.31	1.100	7.1	0.1	0.0	17.4	0.2	0.0	0.0	376.8	0.0	
Move Crane barge to cofferdam location	tow tug	1	1,500	1,119	Travel b/w 25-mile boundary and WP	4 trips	3	13		Quonset Point, RI	0.31	1.100	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
HDD Cofferdam Excavation	crane barge	1	400	298	Excavation	2 days	10 hrs/day	20	2 day @10 hrs/day - Spd. 12 knots		0.43	1.100	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Moving crew in and out	crew boat	1	750	559		10 days	2 hrs/day	20	1hr each way per crew boat		0.45	1.100	0.1	0.0	0.0	0.0	0.0	0.0	0.0	4.2	0.0	
Subtotal													13.2	0.3	0.0	2.2	0.4	0.4	735	0.0	0.0	
Turbine installation	one specialized vessel	1	6,000	4,474	Travel b/w 25-mile boundary and WP	86 trips	3	269	Only emissions within 25 miles of Wind Park	Quonset Point, RI	0.83	1.100	16.0	0.6	0.2	11.3	0.6	0.0	0.0	781.2	0.0	
Turbines to Wind Farm	crew boats	4	750	559		130 days	2 hrs/day	260	2 days per WTG		0.45	1.100	3.2	0.1	0.0	0.5	0.1	0.1	248.8	0.0		
Subtotal													19.1	0.7	0.3	1.8	0.7	0.6	1,000	0.0	0.0	
ESP Installation	tow tug	1	3,000	2,237	Travel b/w 25-mile boundary and WP	2 trips	3	6		Quonset Point, RI	0.31	1.100	0.1	0.0	0.0	0.0	0.0	0.0	0.0	3.6	0.0	
Crane barge towing	attendant tug	1	3,000	2,237	Travel b/w 25-mile boundary and WP	1	16 hrs.	20	4 hrs. transit and 16 hrs. on site		0.31	1.100	0.2	0.0	0.0	0.0	0.0	0.0	0.0	11.6	0.0	
Handling crane barge	tow tug	1	3,000	2,237	Travel b/w 25-mile boundary and WP	2 trips	3	6		Quonset Point, RI	0.31	1.100	0.1	0.0	0.0	0.0	0.0	0.0	0.0	3.6	0.0	
Pile Installation barge towing	attendant tug	1	3,000	2,237	Travel b/w 25-mile boundary and WP	6	3 hrs.	18			0.31	1.100	0.2	0.0	0.0	0.0	0.0	0.0	0.0	10.4	0.0	
Handling barge	tow tug	1	3,000	2,237	Travel b/w 25-mile boundary and WP	2 trips	3	6		Quonset Point, RI	0.68	1.100	0.3	0.0	0.0	0.0	0.0	0.0	0.0	14.9	0.0	
ESP deck to wind farm	attendant tug	1	3,000	2,237	Travel b/w 25-mile boundary and WP	2 trips	3	6			0.31	1.100	0.1	0.0	0.0	0.0	0.0	0.0	0.0	3.6	0.0	
Crane barge towing	tow tug	1	3,000	2,237	Travel b/w 25-mile boundary and WP	2 trips	3	6		Quonset Point, RI	0.31	1.100	0.1	0.0	0.0	0.0	0.0	0.0	0.0	3.6	0.0	
Setting the deck for ESP installation	crane barge	1	6,000	4,474		1	16 hrs.	16			0.83	1.100	1.0	0.0	0.0	0.0	0.0	0.0	45.5	0.0		
Handling crane barge	attendant tug	1	3,000	2,237		2 trips	9 hrs/trip	18	12 hrs. out, 6 hours back		0.31	1.100	0.2	0.0	0.0	0.0	0.0	0.0	10.4	0.0		
Moving crew in and out	crew boats	4	750	559		160 trips	2 hrs/trip	320	40 days, 2 RT/day - 2 hrs. each way		0.45	1.100	3.5	0.1	0.0	0.6	0.1	0.1	269.3	0.0		
Subtotal													5.0	0.2	0.0	0.8	0.2	0.2	374	0.0	0.0	
TOTAL Construction Emissions Over 1 to 2-Year Construction Duration													172.6	6.3	2.1	16.0	6.5	6.0	8,778	0.1	0.1	

All operating hours will be metered to track actual emissions.

Diesel Fuel Sulfur Content: 15 ppm

Emission Factors from EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009

Engine	NOx	VOC (HC)	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs
MSD & MDO	13.2	0.50	0.01	1.10	0.47	0.43	646.08	0.00635
Emission Factors - Harbor Craft, Tier 0, g/kWh (Table 3-8)								
Engine Power	NOx	VOC (HC)	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs
225 - 449 kW (Cat. 1)	10.0	0.27	0.001	1.50	0.30	0.29	690.00	0.0161
450 - 559 kW (Cat. 1)	10.0	0.27	0.001	1.50	0.30	0.29	690.00	0.0161
560 - 999 kW (Cat. 1)	10.0	0.27	0.001	1.50	0.30	0.29	690.00	0.00635
1,000 kW (Cat. 1)	13.0	0.27	0.001	2.50	0.30	0.29	690.00	0.00635
1,000 - 3,000 kW (Cat. 1)	13.2	0.50	0.001	1.10	0.72	0.70	690.00	0.00635

Category 1 vessels are defined by EPA as small harbor craft and recreational propulsion (<1,000 kW)
Category 2 vessels are defined by EPA as OGV auxiliary engines, harbor craft, and smaller OGV propulsion (1,000-3,000 kW)
Category 3 vessels are defined by EPA as OGV propulsion engines (>3,000 kW)

HAP emission factors are from AP-42 (Sections 3.3 & 3.4)

Load Factors are from Table 3-4 of the EPA Port Emissions Guidance Document

Emissions (tons) = Engine Power Rating (kW) x Load Factor (%) x Activity (hrs) x Emission Factor (g/kWh) x (1 lb/454 g) x (1 ton/2000 lb) x (# of sources)

Activity Type	Vessel Type/ Emission Source	Number of Sources	Equipment Size (HP)	Equipment Size (kW)	Activity	Count	Duration	Operating Hours (per unit)	Assumptions	Load Factor	Auxiliary Engine Power Adjustment	NOx	VOC	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs		
Operation Period - Activities beyond 25 Miles of the Project in MA Waters																					
Maintenance - per year																					
Special duty supply vessel	Maintenance vessel	1	3,000	2,237	Travel New Bedford and WP	48 trips	5 hrs/trip	10	Required irregularly assume 2 trips per month	0.43	1.100	0.2	0.0	0.0	0.0	0.0	0.0	719	0.0		
Support vessel	Maintenance vessels	1	1,500	1,119	Travel New Bedford and WP	504 trips	1 hr/trip	21	avg. 1 trips/day X 252 days	0.43	1.100	0.2	0.0	0.0	0.0	0.0	0.0	833	0.0		
Total Operation Emissions												0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	16	0.0

Note: Hours were prorated based on the following assumptions:

- New Bedford to 25-mile Radius Border = 2.2 Miles
- New Bedford to Wind Park = 53.8 Miles
- Miles are nautical miles

All operating hours will be metered to track actual emissions.

Note: All trips are one-way (not round trips).

Emission Factors from EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009

Emission Factors - Ocean Going Vessel Main Engines, Medium-Speed Diesel, Marine Diesel Oil, g/KWh (Table 2-9)

Engine	NOx	VOC (HC)	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs
M&S & MDO	13.2	0.90	0.20	1.10	0.43	0.43	646.08	0.0635
Emission Factors - Harbor Craft, Tier 0, g/KWh (Table 3-8)								
Engine Power	NOx	VOC (HC)	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs
225 - 449 kW (Cat. 1)	10.0	0.27	0.043	1.50	0.30	0.29	690.00	0.0161
450 - 559 kW (Cat. 1)	10.0	0.27	0.043	1.50	0.30	0.29	690.00	0.0161
560 - 899 kW (Cat. 1)	10.0	0.27	0.043	1.50	0.30	0.29	690.00	0.0635
1,000 kW (Cat. 1)	13.0	0.27	0.043	2.50	0.29	0.29	690.00	0.0635
1,000-3,000 kW (Cat. 2)	13.2	0.90	0.043	1.10	0.72	0.70	690.00	0.0635

Category 1 vessels are defined by EPA as small harbor craft and recreational propulsion (<1,000 kW)

Category 2 vessels are defined by EPA as OGV auxiliary engines, harbor craft, and smaller OGV propulsion (1,000-3,000 kW)

Category 3 vessels are defined by EPA as OGV propulsion engines (>3,000 kW)

HAP emission factors are from AP-42 (Sections 3.3 & 3.4)

Load Factors are from Table 3-4 of the EPA Port Emissions Guidance Document

Emissions (tons) = Engine Power Rating (kW) x Load Factor (%) x Activity (hrs) x Emission Factor (g/KWh) x (1 lb/454 g) x (1 ton/2000 lb) x (# of sources)

Activity Type	Vessel Type/ Emission Source	Number of Sources	Equipment Size (HP)	Equipment Size (kW)	Activity	Count	Duration (hr/trip)	Operating Hours (per unit)	Assumptions	Load Factor	Auxiliary Engine Power Adjustment	Emissions (tons)										
												NOx	VOC	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs			
Construction Period - Activities beyond 25 Miles of the Project and in RI Waters																						
Move jack up barge	attendant tug	1	3,000	2,237	Trips to/fr Quonset Point RI	4 trips	2	10		0.31	1.100	0.11	0.00	0.00	0.01	0.01	0.01	0.01	0.01	0.01	5.51	0.00
Transport piles & transition pieces	tow tug	1	6,000	4,474	Trips to/fr Quonset Point RI	86 trips	2	204	avg. 3 piles per trip, 130 piles	0.68	1.100	9.94	0.36	0.15	0.83	10.55	0.37	0.37	0.37	0.37	466.38	0.00
Move scour installation equipment	attendant tug	1	3,000	2,237	Trips to/fr Quonset Point RI	4 trips	2	10	This is done twice (once per year)	0.31	1.100	0.11	0.00	0.00	0.01	0.01	0.01	0.01	0.01	5.51	0.00	
Transport rock armor barges	tow tug	1	6,000	4,474	Trips to/fr Quonset Point RI	276 trips	2	656	Spd. 8 knts	0.68	1.100	31.89	1.21	0.43	2.66	3.14	1.04	1.04	1.04	150.95	0.02	
Transport filler material barges	tow tug	1	6,000	4,474	Trips to/fr Quonset Point RI	370 trips	2	879	Spd. 8 knts	0.68	1.100	42.75	1.62	0.64	3.56	1.52	1.30	1.30	1.30	202.58	0.02	
Subtotal												84.8	3.2	2.3	7.1	3.0	2.8	2.8	2.8	4.151	0.0	
Activity Type																						
Cable laying	115 kV Cable laying barge	1	1,500	1,119	Trips to/fr Quonset Point RI	4 trips	2	10	Assumptions	0.31	1.100	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.75	0.00	
33 kV Cable laying barge	tow tug	1	1,500	1,119	Trips to/fr Quonset Point RI	26 trips	2	62	13 round trips	0.31	1.100	0.34	0.01	0.00	0.03	0.02	0.02	0.02	0.02	17.90	0.00	
Move Crane barge to cofferdam location	tow tug	1	1,500	1,119	Trips to/fr Quonset Point RI	4 trips	2	10		0.31	1.100	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.75	0.00	
Subtotal												0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.3	0.0	
Turbine installation	one specialized vessel	1	6,000	4,474	Trips to/fr Quonset Point RI	86 trips	2	204		0.83	1.100	17.13	0.46	0.18	1.01	0.43	0.40	0.40	0.40	593.67	0.01	
Subtotal												12.1	0.5	0.2	1.0	0.4	0.4	0.4	0.4	594	0.0	
ESP Installation																						
Crane barge towing	tow tug	1	3,000	2,237	Trips to/fr Quonset Point RI	2 trips	2	5		0.31	1.100	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.75	0.00	
Pile Installation barge towing	tow tug	1	3,000	2,237	Trips to/fr Quonset Point RI	2 trips	2	5		0.31	1.100	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.75	0.00	
ESP deck to wind farm	tow tug	1	6,000	4,474	Trips to/fr Quonset Point RI	2 trips	2	5		0.68	1.100	0.23	0.01	0.00	0.02	0.01	0.01	0.01	0.01	11.31	0.00	
Crane barge towing	tow tug	1	3,000	2,237	Trips to/fr Quonset Point RI	2 trips	2	5		0.31	1.100	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.75	0.00	
Subtotal												0.4	0.0	0.0	0.0	0.0	0.0	0.0	2.0	0.0		
TOTAL Construction Emissions												97.8	3.7	1.5	8.1	3.5	3.2	3.2	3.2	4,788	0.0	
Over 2-year Construction Duration																						

- Quonset Point to RI Border = 19 Miles

- Miles are nautical miles

A vessel speed of 8 knots was assumed to determine the duration for each trip

All operating hours will be metered to track actual emissions.

Note: All trips are one-way (not round trips).

Emission Factors from EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009

Engine	NOx	VOC (HC)	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs
MSD & MDO	13.2	0.50	0.20	1.10	0.47	0.43	646.08	0.00635
Emission Factors - Harbor Craft, Tier 0, g/kWh (Table 3-8)								
Engine Power	NOx	VOC (HC)	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs
225 - 449 kW (Cat. 1)	10.0	0.27	0.043	1.50	0.30	0.29	690.00	0.0161
450 - 569 kW (Cat. 1)	10.0	0.27	0.043	1.50	0.30	0.29	690.00	0.0161
570 - 899 kW (Cat. 1)	10.0	0.27	0.043	1.50	0.30	0.29	690.00	0.0161
1,000 - 3,000 kW (Cat. 2)	13.2	0.50	0.043	1.10	0.30	0.29	690.00	0.00635

Category 1 vessels are defined by EPA as small harbor craft and recreational propulsion (<1,000 kW)
 Category 2 vessels are defined by EPA as OGV auxiliary engines, harbor craft, and smaller OGV propulsion (1,000-3,000 kW)
 Category 3 vessels are defined by EPA as OGV auxiliary engines, harbor craft, and smaller OGV propulsion (3,000-10,000 kW)
 HAP emission factors are from AP-42 (Sections 3.3 & 3.4)

Load Factors are from Table 3-4 of the EPA Port Emissions Guidance Document

Emissions (tons) = Engine Power Rating (kW) x Load Factor (90) x Activity (hrs) x Emission Factor (g/kWh) x (1 lb/454 g) x (1 ton/2000 lb) x (# of sources)

Activity Type	Vessel Type/ Emission Source	Number of Sources	Equipment Size (HP)	Equipment Size (kW)	Activity	Count	Duration (hr/trip)	Operating Hours (per unit)	Assumptions	Load Factor	Auxiliary Engine Power Adjustment	Emissions (tons)												
												NOx	VOC	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs					
Construction Period - Activities beyond 25 Miles of the Project and in MA Waters																								
Move jack up barge	attendant tug	1	3,000	2,237	Trips to/fr Point, RI	4 trips	1	4		0.31	1.100	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Transport piles and transition pieces	low tug	1	6,000	4,474	Trips to/fr Point, RI	86 trips	1	78	avg. 3 piles per trip, 130 piles	0.68	1.100	3.82	0.14	0.065	0.92	0.12	0.17	186.97	0.00	0.00	0.00	0.00	0.00	0.00
Move scour installation equipment	attendant tug	1	3,000	2,237	Trips to/fr Point, RI	4 trips	1	4	This is done twice (once per year)	0.31	1.100	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Transport rock armor barges	low tug	1	6,000	4,474	Trips to/fr Point, RI	276 trips	1	252	Spd. 8 knts	0.68	1.100	12.25	0.46	0.18	1.02	0.44	160.40	59.74	0.01	0.01	0.01	0.01	0.01	0.01
Transport filler material barges	low tug	1	6,000	4,474	Trips to/fr Point, RI	370 trips	1	338	Spd. 8 knts	0.68	1.100	16.43	0.62	0.25	1.37	0.58	203.99	80.39	0.01	0.01	0.01	0.01	0.01	0.01
Subtotal												32.6	1.2	0.5	2.7	1.2	1.1	1,595	0.0	0.0	0.0	0.0	0.0	0.0
Construction Period - Activities within 25 Miles of the Project and in MA Waters																								
Cable laying	115 kV Cable laying barge	1	1,500	1,119	Trips to/fr Point, RI	4 trips	1	4		0.31	1.100	0.02	0.00	0.00	0.00	0.00	0.00	1.06	0.00	0.00	0.00	0.00	0.00	0.00
33 kV Cable laying barge	low tug	1	1,500	1,119	Trips to/fr Point, RI	26 trips	1	24	13 round trips	0.31	1.100	0.13	0.00	0.00	0.01	0.01	0.01	6.88	0.00	0.00	0.00	0.00	0.00	0.00
Move Crane barge to cofferdam location	low tug	1	1,500	1,119	Trips to/fr Point, RI	4 trips	1	4		0.31	1.100	0.02	0.00	0.00	0.00	0.00	0.00	1.06	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal												0.2	0.0	0.0	0.0	0.0	0.0	9	0.0	0.0	0.0	0.0	0.0	0.0
Turbine installation	one specialized vessel	1	6,000	4,474	Trips to/fr Point, RI	85 trips	1	78		0.83	1.100	4.66	0.16	0.07	0.39	0.17	0.15	228.10	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal												4.7	0.2	0.1	0.4	0.2	0.2	228	0.0	0.0	0.0	0.0	0.0	0.0
ESP Installation																								
Crane barge towing	low tug	1	3,000	2,237	Trips to/fr Point, RI	2 trips	1	2		0.31	1.100	0.02	0.00	0.00	0.00	0.00	0.00	1.06	0.00	0.00	0.00	0.00	0.00	0.00
Pile installation barge towing	low tug	1	3,000	2,237	Trips to/fr Point, RI	2 trips	1	2		0.31	1.100	0.02	0.00	0.00	0.00	0.00	0.00	1.06	0.00	0.00	0.00	0.00	0.00	0.00
ESP deck to wind farm	low tug	1	6,000	4,474	Trips to/fr Point, RI	2 trips	1	2		0.68	1.100	0.09	0.00	0.00	0.00	0.00	0.00	4.95	0.00	0.00	0.00	0.00	0.00	0.00
Crane barge towing	low tug	1	3,000	2,237	Trips to/fr Point, RI	2 trips	1	2		0.31	1.100	0.02	0.00	0.00	0.00	0.00	0.00	1.06	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal												0.1	0.0	0.0	0.0	0.0	0.0	8	0.0	0.0	0.0	0.0	0.0	0.0
TOTAL Construction Emissions												37.6	1.4	0.6	3.1	1.3	1.2	1,839	0.0	0.0	0.0	0.0	0.0	0.0
Over 2-year Construction Duration																								

- MA Border to 25-mile limit = 7.3 Miles
 - Miles are nautical miles
 A vessel speed of 8 knots was assumed to determine the duration for each trip
 All operating hours will be metered to track actual emissions.

Note: All trips are one-way (not round trips).

Emission Factors from EPA's "Current Methodologies and Best Practices in Preparing Port Emission Inventories", April 2009

Emission Factors - Ocean Going Vessel Main Engines, Medium-Speed Diesel, Marine Diesel Oil, g/kWh (Table 2-9)

Engine	NOx	VOC (HC)	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs
MSD & MDO	132	0.30	0.20	1.10	0.47	0.43	646.08	0.006535

Emission Factors - Harbor Craft, Tier 0, g/kWh (Table 3-8)

Engine Power	NOx (HC)	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs
225 - 449 kW (Cat. 1)	10.0	0.27	0.043	1.50	0.29	690.00	0.0161
450 - 559 kW (Cat. 1)	10.0	0.27	0.043	1.50	0.30	690.00	0.0161
560 - 999 kW (Cat. 1)	10.0	0.27	0.043	1.50	0.29	690.00	0.006535
1,000 kW (Cat. 1)	13.0	0.27	0.043	2.50	0.30	690.00	0.006535
1,000 - 3,000 kW (Cat. 2)	13.2	0.50	0.043	1.10	0.72	690.00	0.006535

Category 1 vessels are defined by EPA as small harbor craft and recreational propulsion (<1,000 kW)

Category 2 vessels are defined by EPA as OGV auxiliary engines, harbor craft, and smaller OGV propulsion (1,000-3,000 kW)

Category 3 vessels are defined by EPA as OGV propulsion engines (>3,000 kW)

HAP emission factors are from AP-42 (Sections 3.3 & 3.4)

Load Factors are from Table 3-4 of the EPA Port Emissions Guidance Document

Emissions (tons) = Engine Power Rating (kW) x Load Factor (%) x Activity (hrs) x Emission Factor (g/kWh) x (1 lb/454 g) x (1 ton/2000 lb) x (# of sources)

Construction Period - Activities beyond 25 Miles of the Project

Activity Type	Vessel Type/ Emission Source	Number of Sources	Equipment Size (HP)	Equipment Size (kW)	Activity	Count	Duration (hr/trip)	Operating Hours (per unit)	Assumptions	Load Factor	Auxiliary Engine Power Adjustment	Emissions (tons)							
												NOx	VOC	SO ₂	CO	PM ₁₀	PM _{2.5}	CO ₂	HAPs
Move jack up barge	attendant tug	1	3,000	2,237	Trips to/frm Quonset Point, RI	4 trips	4	17		0.31	1.100	0.19	0.01	0.00	0.02	0.01	0.01	10.12	0.00
Transport piles & transition pieces	tow tug	1	6,000	4,474	Trips to/frm Quonset Point, RI	86 trips	4	375	avg. 3 piles per trip, 130 piles	0.68	1.100	16.25	0.69	0.27	1.52	0.65	0.59	803.43	0.01
Move scour installation equipment	attendant tug	1	3,000	2,237	Trips to/frm Quonset Point, RI	4 trips	4	17	This is done twice (once per year)	0.31	1.100	0.19	0.01	0.00	0.02	0.01	0.01	10.12	0.00
Transport rock armor barges	tow tug	1	6,000	4,474	Trips to/frm Quonset Point, RI	276 trips	4	1,204	Spd. 8 knts	0.68	1.100	58.59	2.22	0.89	4.88	2.09	1.91	2867.23	0.03
Transport filler material barges	tow tug	1	6,000	4,474	Trips to/frm Quonset Point, RI	370 trips	4	1,614	Spd. 8 knts	0.68	1.100	78.53	2.97	1.18	6.54	2.80	2.56	3843.75	0.04
Subtotal												155.8	5.9	2.3	13.0	5.6	5.1	7,625	0.1
Activity Type	Vessel Type/ Emission Source	Number of Sources	Equipment Size (HP)	Equipment Size (kW)	Activity	Count	Duration (hr/trip)	Operating Hours (per unit)	Assumptions			NOx	VOC	SO₂	CO	PM₁₀	PM_{2.5}	CO₂	HAPs
Cable laying	tow tug	1	1,500	1,119	Trips to/frm Quonset Point, RI	4 trips	4	17		0.31	1.100	0.10	0.00	0.00	0.01	0.01	0.01	5.06	0.00
33 kV Cable laying barge	tow tug	1	1,500	1,119	Trips to/frm Quonset Point, RI	26 trips	4	113	13 round trips	0.31	1.100	0.63	0.02	0.00	0.05	0.03	0.03	32.88	0.00
Move Crane barge to cofferdam location	tow tug	1	1,500	1,119	Trips to/frm Quonset Point, RI	4 trips	4	17		0.31	1.100	0.10	0.00	0.00	0.01	0.01	0.01	5.06	0.00
Subtotal												0.8	0.0	0.0	0.1	0.0	0.0	43	0.0
Turbine Installation	one specialized vessel	1	6,000	4,474	Trips to/frm Quonset Point, RI	86 trips	4	375		0.83	1.100	22.28	0.84	0.34	1.86	0.79	0.73	1090.49	0.01
Subtotal												22.3	0.8	0.3	1.9	0.8	0.7	1,090	0.0
ESP Installation												0.10	0.00	0.00	0.01	0.01	0.01	5.06	0.00
Crane barge towing	tow tug	1	3,000	2,237	Trips to/frm Quonset Point, RI	2 trips	4	9		0.31	1.100	0.10	0.00	0.00	0.01	0.01	0.01	5.06	0.00
Pile installation barge towing	tow tug	1	3,000	2,237	Trips to/frm Quonset Point, RI	2 trips	4	9		0.31	1.100	0.10	0.00	0.00	0.01	0.01	0.01	5.06	0.00
ESP deck to wind farm	tow tug	1	6,000	4,474	Trips to/frm Quonset Point, RI	2 trips	4	9		0.68	1.100	0.42	0.02	0.01	0.04	0.02	0.02	20.79	0.00
Crane barge towing	tow tug	1	3,000	2,237	Trips to/frm Quonset Point, RI	2 trips	4	9		0.31	1.100	0.10	0.00	0.00	0.01	0.01	0.01	5.06	0.00
Subtotal												0.7	0.0	0.0	0.1	0.0	0.0	36	0.0
TOTAL Construction Emissions												179.6	6.8	2.7	15.0	6.4	5.9	8,794	0.1
Over 2-year Construction Duration																			

- Quonset Point to 25-mile limit = 34.9 Miles

- Miles are nautical miles

A vessel speed of 8 knots was assumed to determine the duration for each trip

All operating hours will be metered to track actual emissions.