



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

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December 18, 2018

Alexandra Dapolito Dunn
Regional Administrator
U.S. Environmental Protection Agency Region 1
5 Post Office Square
Mail Code: OEP05-2
Boston, MA 02109-3912

Subject: Request for Corresponding OnShore Area Designation for Meteorological Buoy
Installation, Deepwater Wind New England, LLC

Dear Administrator Dunn:

On October 22, 2018, Deepwater Wind New England, LLC (Deepwater Wind) submitted to the U.S. Environmental Protection Agency (EPA) an Amended Notice of Intent (NOI) for the proposed installation of a meteorological buoy (met buoy) in support of offshore wind projects in Renewable Energy Lease Number OCS-A 0486. The met buoy installation area is located approximately 17 miles from Block Island, Rhode Island and approximately 23 miles from Nomans Land Island, Massachusetts (see Attachment 1). The met buoy is powered by a rechargeable battery pack that can be charged by an onboard wind turbine and/or solar panels, with an optional back-up engine generator. Air pollutant emissions from the project, including nitrogen oxides and volatile organic compounds, would occur during use of ocean vessels used to install, service, and decommission the met buoy, and from operation of the back-up engine for the met buoy if the solar panels and battery fail.

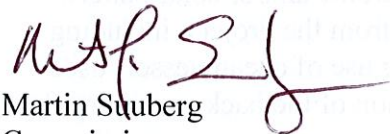
In accordance with the Outer Continental Shelf (OCS) Air Regulations in 40 CFR § 55.4, Deepwater Wind submitted copies of the NOI to the Rhode Island Department of Environmental Management (RIDEM), which is the Nearest Onshore Area (NOA), and to the Massachusetts Department of Environmental Protection (MassDEP), which is an onshore area adjacent to the NOA.

EPA's OCS regulation set criteria for another state to submit a request to EPA to be designated as the Corresponding Onshore Area (COA), despite the existence of a geographically closer State, like Rhode Island, which is the NOA for the met buoy. Therefore, pursuant to 40 CFR § 55.5(b), MassDEP requests that EPA designate Massachusetts as the Corresponding Onshore Area (COA) for the met buoy for the following reasons:

- While RI DEM and MassDEP have stringent air pollution regulations, MassDEP has more stringent requirements with respect to opacity [compare 310 CMR 7.06(1)(b) to 250-RICR-120-05-1 1.6]. *See* 40 CFR § 55.5(b)(2)(i).
- Emissions from the met buoy would be transported predominantly to Massachusetts. An analysis of wind speed and direction data from weather stations at Martha's Vineyard Airport in Massachusetts and at Block Island State Airport in Rhode Island show that prevailing winds in the Rhode Island/southeastern Massachusetts area predominantly blow from the west and the southwest (see Attachment 2). Land areas downwind from the met buoy are predominantly in Massachusetts. *See* 40 CFR § 55.5(b)(2)(ii).
- The transported emissions associated with the met buoy would affect Massachusetts' efforts to attain and maintain the 2015 Ozone National Ambient Air Quality Standards (NAAQS) of 70 parts per billion (ppb). During the 2018 ozone season, southeastern Massachusetts ozone monitors recorded numerous days in excess of 70 ppb. Nitrogen oxides (NO_x), a precursor to ozone, are the highest emitted criteria pollutant from the installation, operation, and decommissioning of the met buoy. Given that emissions associated with the met buoy project primarily will be transported to Massachusetts, these emissions will affect Massachusetts' efforts to attain or maintain the 2015 Ozone NAAQS. *See* 40 CFR § 55.5(b)(2)(iii).

If you have question or would like additional information regarding this request, please contact Glenn Keith of my staff at 617-292-5874.

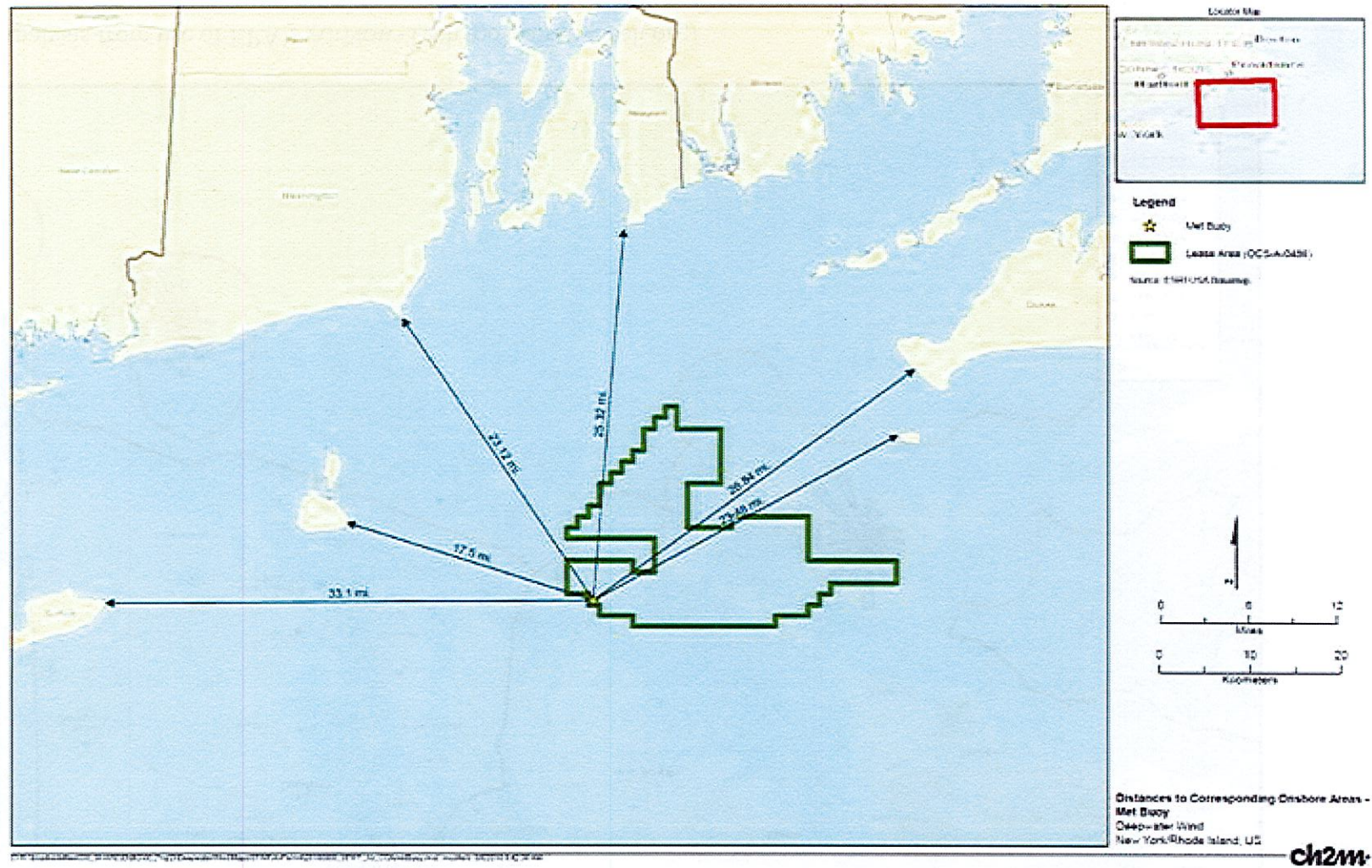
Sincerely,



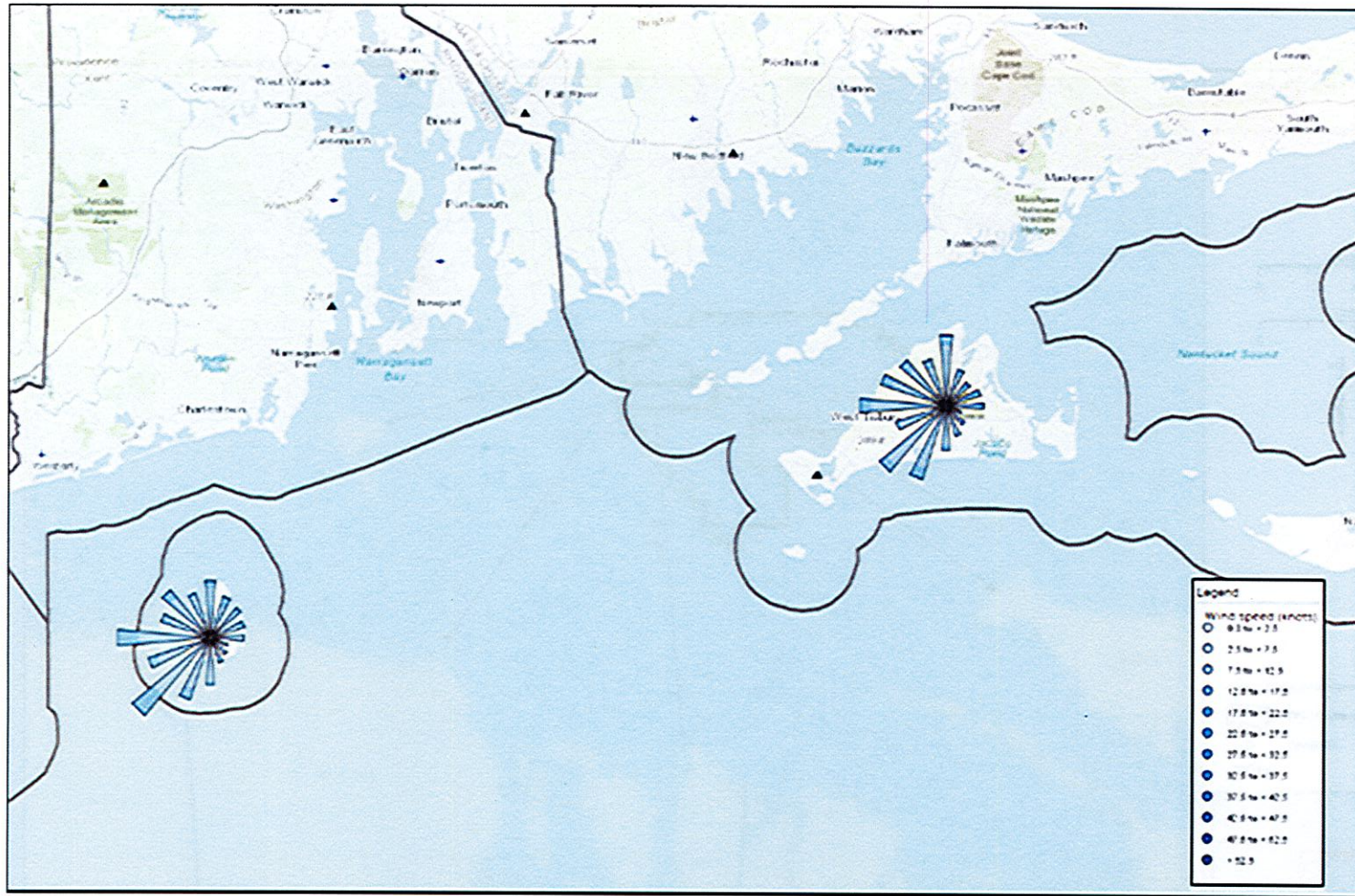
Martin Suuberg
Commissioner

cc: Janet Coit, Director, RI DEM
Laurie Grandchamp, Chief, Office of Air Resources, RI DEM
David Conroy, Air Chief, EPA Region 1

Attachment 1: Distances from Met Buoy to Onshore Areas



Attachment 2: Wind Rose Analysis Compiling Wind Speed and Direction Data for Martha's Vineyard Airport and Block Island State Airport from January 1, 2013 to December 31, 2017



Analysis from use of EPA's AirNow-Tech tool (airnowtech.org)