

CITY OF NEW YORK
MANHATTAN COMMUNITY BOARD FOUR
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JEFFREY LEFRANCOIS
Chair

JESSE R. BODINE
District Manager

August 4, 2023

Tim Cawley
Chairman and CEO
ConEdison
Corporate Secretary
Con Edison
4 Irving Place
New York, New York 10003

re: Title V Permit Renewal at West 59 Street Station

Manhattan Community Board 4 (MCB4) would like to thank ConEdison for the update on the 5 year Title V Air Permit Renewal permitting process for your 59th Street Steam Station. We realize this is only the first step in a much longer process and that as part of that permitting process, you will come back to us with additional information sometime later this year. While you have not requested a letter of approval at this time, we felt it important to express some initial concerns we have about air emissions from your 59th Street Steam Station.

By a vote of 37 in favor, 0 opposed, 0 present not eligible, 0 against, and 0 abstaining, at its July meeting, Manhattan Community Board 4 (MCB4) approved the concerns expressed in this letter.

At MCB4's Waterfront, Parks & Environment Committee (WPE) meeting of July 13, 2023, you told us that the two major changes from the previous air permit application are that you plan to switch the backup fuel oil from Number 4 to cleaner burning (but not clean) Number 2 fuel oil at a cost of millions of dollars for the purchase of equipment with an estimated useful life of 25 years. Although you told us that this conversion will reduce unwanted emissions by 2024, the committee questioned why the Station would switch from Number 4 oil to Number 2 oil for the mere reduction in emissions for the next 25 years, as opposed to converting directly to zero-emission renewables now, thereby eliminating all toxic discharges from your backup systems forever.

You also told us that you plan to install "water injection" controls on the natural-gas powered turbine to reduce its emissions of nitrogen oxide (NOx). We applaud these changes as they will

reduce (but not eliminate) unwanted emissions from your plant. You told us these changes would be installed by the end of 2024. At the WPE meeting we expressed and continue to express our hope that your proposed changes will be completed on a shorter time frame than the one you propose.

While we believe your proposed changes will diminish unwanted air emissions, you have presented no data to substantiate that result. At the WPE meeting we requested that you provide the Community Board and the public a simplified version of your Green House Gas emissions data for the 59th Street Station covering at least the last 5 years including at a minimum emission for particulates (both PM2.5 and larger), CO₂, Methane and NO_x. We were pleased that you offered to provide this information and look forward to receiving it.

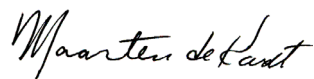
During your presentation you indicated that your plant would be operating fully on renewable energy sources by 2050 and that you would be implementing emission reducing changes going beyond the Title V Air Renewal Application before then. Among the technologies you mentioned were industrial heat pumps, industrial electric boilers, and the use of low carbon fuels such as methane from the nearby sewage treatment plant and hydrogen. We understand that the technologies for renewal energy sources are rapidly changing making your choice of which technology to use difficult as any new installation for your 20 MW plant would require significant capital investment that you would expect to serve over many years. Nevertheless, the committee felt that 2050 (more than a quarter century away) is much too long to wait for a much more significant reduction of air emissions from the 59th Street Station (as well as from your other steam generating stations). A climate change is upon us. ConEd should be leading the way in converting all its power-generating systems to renewable zero-emission technologies, rather than waiting on New York State regulatory mandates.

We look forward to hearing more about ConEd's emissions reduction strategies, both short and long term, at the 59th Street Station in connection with the Title V Air permit renewal application and beyond it. We agreed to revisit these issues with you in the fall of 2023.

Sincerely,



Jeffrey LeFrancois
Chair
Manhattan Community Board 4



Maarten deKadt
Co-chair
Waterfront, Parks & Environment Committee



Leslie Boghosian Murphy
Co-chair
Waterfront, Parks & Environment Committee