

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

## Division of Environmental Permits

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October 20, 2023

Consolidated Edison Company of New York, Inc.  
4 Irving Place  
New York, New York 10003

Re: Final Modified Permit  
Con Ed 59<sup>th</sup> Street Station  
State Pollutant Discharge Elimination System (SPDES) Permit  
SPDES NY0005134 DEC ID 2-6202-00032/0001

Dear Permittee,

Enclosed is a final modified State Pollutant Discharge Elimination System (SPDES) permit for the above referenced facility. This permit has been modified by the Department in accordance with the notice of proposed permit modification letter dated 3/28/2023 and becomes effective 12/01/2023.

Also enclosed is the final permit fact sheet, and a responsiveness summary in response to comments received during the public comment period.

Please be advised, the Uniform Procedures Regulations (6 NYCRR Part 621) provide that an applicant may request a public hearing if a permit contains conditions which are unacceptable to them. Any such request must be made in writing within 30 calendar days of the date of permit issuance and must be addressed to the Permit Administrator at the letterhead address. A copy should also be sent to the Chief Administrative Law Judge at NYSDEC, 625 Broadway, 1st Floor, Albany, NY 12233-1550.

Should you have questions on the administration of this renewal and modification, please feel free to contact me at the address or phone number listed above. Should you have technical questions on permit content, please contact Gwendolyn Temple at (518) 402-9029.

Sincerely,



James J Eldred  
Environmental Analyst

Enclosures: permit effective 12/1/2023, final permit fact sheet, responsiveness summary

c: RPA  
S. Southwell, RWE  
G. Temple, CO DOW – Permit writer  
CO-BWP Permit Coordinator  
USEPA Region 2  
EFC  
NYC Mayor's Office (LWRP consideration)  
NYCDEP  
NYC DOH  
Borough President and Community Board(s)

**Responsiveness Summary**  
**Permit No. NY0005134, DEC #2-6202-00032/00004**  
**Consolidated Edison Company of New York, Inc.**  
**59th Street Station**

**10/20/2023**

**Background**

The New York State Department of Environmental Conservation (NYSDEC) issued a final State Pollutant Discharge Elimination System (SPDES) permit to Consolidated Edison Company of New York, Inc. for the 59<sup>th</sup> Street Station on 10/20/2023. The final permit was developed as a permit renewal, with changes requested by the permittee pursuant to 6 NYCRR Part 750, following the receipt of an NY-2C application as outlined in the final Fact Sheet. The draft permit was publicly noticed in the *Environmental Notice Bulletin* on 3/29/2023, and in the NY Daily News on 3/31/2023. The public comment period closed on 5/1/2023.

Timely comments were received from:

	Affiliation	Name	Date
1	Hudson River Park Advisory Council	Daniel Miller, CB2	4/26/2023
		Tammy Meltzer, CB1	
		Jeffrey LeFrancois CB4	
2	NY 12 <sup>th</sup> District	Congressmember Jerrold Nadler	5/1/2023
	New York State	State Senator Brad Hoylman-Sigal	
	NY Assembly District 67	Assemblymember Linda Rosenthal	
	NYC District 3	City Council Member Erik Bottcher	
3	Riverkeeper	Chase Lindemann, Legal Fellow	4/28/2023
		Michael Dulong, Legal Program Director	
4	The Assembly State of New York Albany	Deborah J. Glick, Assemblymember	4/27/2023

As required by 6 NYCRR 621.10(e), NYSDEC prepared this Responsiveness Summary to address the timely relevant comments that were received on the draft permit and draft fact sheet. These comments, and NYSDEC's responses, have been organized to follow the format of the final Permit. The full text of all comments received as part of the public notice process are included in the Appendix of this Responsiveness Summary.

In response to comments received on the draft permit, the fact sheet for the 59<sup>th</sup> Street Station has been revised. Specific changes made in the final fact sheet, in response to timely public comments, have been noted in the responses below.

Contents

I. Specific Comments..... 3

    A. Hudson River Park Advisory Council ..... 3

    B. Testimony of Congressman Jerrold Nadler, State Senator Brad Hoylman-Sigal,  
    Assemblymember Linda Rosenthal, and City Council Member Erik Bottcher ..... 3

    C. Riverkeeper ..... 4

    D. Assembly Member Deborah J. Glick..... 10

## I. Specific Comments

### A. Hudson River Park Advisory Council

Comment 1: “The Advisory Council recommends that state DEC consider our concerns regarding temperature thresholds and monitoring and limit thermal discharges at Pier 98 to the 188 days per year Con Edison states that it needs river water for cooling. Background information is available upon request. More importantly, the Council urges that state DEC work more closely with Con Edison and in partnership with the Trust to facilitate the transition of Con Edison’s operations at Pier 98 to state-of-the-art technologies that will conserve precious water resources and minimize impacts of wastewater discharges into the Hudson River Park estuarine sanctuary.” (1)

Response 1: Consistent with the [NPDES Permit Writers’ Manual](#), in performing the CORMIX analysis of the 59<sup>th</sup> Street Station discharge and developing the thermal effluent limit in the permit, DEC’s utilized critical conditions for the protection of water quality (ex. effluent flow, effluent pollutant concentration, and critical receiving water ambient conditions including flow and temperature). *“If a discharge is controlled so that it does not cause water quality criteria to be exceeded in the receiving water at the critical flow condition, the discharge controls should be protective and ensure that water quality criteria, and thus designated uses, are attained under all receiving water flow conditions.”* 6.2.4.2 of the [NPDES Permit Writers’ Manual](#). As such, limiting the thermal discharge at Pier 98 to 188 days per year is unnecessary. In addition, 6 NYCRR Part 704 does not explicitly prohibit or permit discharges based on time of year. Please refer to response 2 below and the fact sheet for additional information.

### B. Testimony of Congressman Jerrold Nadler, State Senator Brad Hoylman-Sigal, Assemblymember Linda Rosenthal, and City Council Member Erik Bottcher

Comment 2: “Concerns have been raised that the SPDES permit allows discharge of water up to 104 degrees, while the limit for estuaries is 90 degrees. The 90 degree limit pertains to surface temperature, and the outfalls are located below the surface. We encourage the 104 degree limit to be closely examined, however, to ensure that the water is not being released at a temperature that could harm the estuarine sanctuary. We also encourage DEC to consider limiting thermal discharge to 188 days per year, as recommended by the Advisory Council. We encourage DEC to work with Con Ed to explore ways the water could be further cooled before being released. This change would be not only be beneficial at Pier 98, but more efficient heat-capturing systems are necessary as more electricity is brought into the city as part of the state’s transition away from fossil fuels.

We also encourage DEC to work with Con Ed to explore alternatives to discharging the leftover water from the steam creation process into the river. Thank you for your consideration of our input as part of the permit renewal process.” (2)

Response 2: 6 NYCRR 704.2(b)(5) is the numeric description of the narrative criteria defined in 6 NYCRR 704.1 and specifies that *“the water temperature at the **surface** of an estuary shall not be raised to more than 90 degrees Fahrenheit at any point”*. As explained in the fact sheet, the 104 degrees Fahrenheit limit for the effluent from the **subsurface** Outfall 003 was assessed during the full technical review of the SPDES permit. In

accordance with TOGS 1.3.1, the Department performed a CORMIX analysis reflecting both the critical effluent flow of 4.32 MGD and critical ambient conditions at the highest recorded ambient temperature. The CORMIX analysis confirmed that the thermal limit of 104 degrees Fahrenheit, which is a **subsurface** thermal limit, continues to meet the water quality criteria governing thermal discharges specified in 6 NYCRR 704.2(b)(5). Thus, the previous thermal limit of 104 degrees Fahrenheit is being continued in this permit.

See Response 1 for the explanation of why the thermal effluent limit is not for a specific period of days.

### C. Riverkeeper

#### Comment 3A: "I. Copper and Lead

Copper and lead were detected in the effluent of Outfall 003, but the DEC presumes that the detection levels are the result of the ambient conditions of the Hudson River.<sup>1</sup> According to Con Ed, the copper and lead detections resulted from the presence of copper and lead in the intake water and not because of any Con Ed treatment process.<sup>2</sup> DEC determined that Con Ed's assertions were sufficient to warrant only monitoring of the influent and effluent.

Copper and lead can have devastating impacts on the water quality and the health of ecosystems. Copper in low concentrations is an essential nutrient, but higher concentrations can be toxic to aquatic organisms.<sup>3</sup> Ecosystems with elevated levels of lead can experience "decreased growth and reproduction in plants and animals, and neurological effects in vertebrates."<sup>4</sup>

While Riverkeeper appreciates that DEC would require Con Ed to monitor the influent and the effluent, Riverkeeper finds it concerning that DEC relied only on Con Ed's assertions in determining that monitoring alone was appropriate. Given the sensitivity of the receiving waters, coupled with the fact that the permit applicant claims it is not responsible for the lead and copper levels, DEC should set maximum numerical parameters for lead and copper, which would require remedial action if exceeded.

Using the information provided by Con Ed, DEC seems to presume that the copper and lead levels were present prior to intake through the cooling system. DEC should independently verify whether the presumptions it made were accurate, and Riverkeeper would appreciate if such independent verifications be made prior to issuing the current permit conditions." (3)

Response 3A: As stated in Con Edison's NY-2C application, "*Outfall 003 is associated with the salt water/fresh water heat exchange system for cooling of 49<sup>th</sup> Street Substation*

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<sup>1</sup> Draft SPDES Permit Fact Sheet, Consolidated Edison Company of New York, Inc. 59th Street Station NY0005134 at 22 (2023) [*hereinafter* "Fact Sheet"].

<sup>2</sup> *Id.*

<sup>3</sup> Environmental Protection Agency, *Aquatic Life Criteria - Copper*, <https://www.epa.gov/wqc/aquatic-life-criteria-copper> (last accessed Apr. 28, 2023).

<sup>4</sup> Environmental Protection Agency, *Basic Information About Lead Air Pollution*, <https://www.epa.gov/lead-air-pollution/basic-information-about-lead-air-pollution> (last accessed Apr. 28, 2023).

*electrical cables...Saltwater is drawn from the Hudson River and circulated through a heat exchanger before discharge to Outfall 003 through a 16-inch diameter pipe routed from Pier 98.*” It is non-contact cooling water. This non-contact cooling is strictly a thermal discharge, as the river water does not contact any plant processes. Following the submission of the NY-2C application for permit modification, Con Edison provided the following additional information to DEC: “[t]he piping on the dock is carbon steel, the saltwater pump’s shaft is made of stainless steel and the tubes of the dock heat exchangers are made of ASTM B338 (Titanium Alloy).” None of these components have the potential to leach copper or lead. Additionally, no water treatment chemicals (WTCs) are used for treatment of effluent discharging through Outfall 003, nor are any treatment processes occurring that could discharge through this outfall. Based on this information, the elevated levels of copper and lead noted in the NY-2C application are a result of their presence in the influent water being pulled from the Hudson River for cooling purposes. Independent verification by NYSDEC is not required by regulation, nor is it necessary, as a technical matter, given the information provided by Con Edison.

However, monitoring of the influent and effluent at Outfall 003 is being required to ensure that Con Edison is not introducing additional copper or lead to the Hudson River.

Comment 3B: “II. Chromium, Selenium, Chloroform, and Total Dissolved Solids (TDS)

Chromium, total, and chloroform were detected at Outfall 002, selenium, total was detected at both Outfall 002 and Outfall 003, and total dissolved solids (TDSs) were detected at Outfall 02F.<sup>5</sup> The Hudson River is designated as a Class I waterbody and there are no water quality standards for chloroform, selenium, and TDSs.<sup>6</sup> There is a water quality standard for chromium (hexavalent), but not for chromium, total.<sup>7</sup>

DEC determined that the lack of a water quality standard was enough to preclude the DEC from including any limitation on Con Ed. For chromium, DEC added that comparing the projected instream concentration of chromium, total to the chromium (hexavalent) water quality standards “indicate[d] no reasonable potential to cause or contribute to a water quality standards violation.”<sup>8</sup> At a minimum, Riverkeeper would like to see DEC include effluent monitoring for these pollutants. Such monitoring would also give the DEC confirmation that the projections relied on mirror reality. Beyond monitoring, Riverkeeper asks that DEC, despite the lack of water quality standards for Class I waterbodies, exercise its authority to place effluent limitations on these pollutants.” (3)

Response 3B: Per 6 NYCRR 703.1, “A water quality standard, guidance value or groundwater effluent limitation includes all (total) forms of the substance, unless indicated otherwise. Where a standard or guidance value is for a specific form of the substance, water quality-based effluent limitations for SPDES permits may include other forms of the substance to account for changes in the substance that occur in the receiving water.” While no water quality standard exists for Chromium, Total to Class I waterbodies, a

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<sup>5</sup> Fact Sheet, *supra* note 2, at 16–17, 21–22.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.* at 16.

<sup>8</sup> *Id.*

guidance value does exist for Chromium, Hexavalent which is a potential subset of Chromium, Total. A reasonable potential analysis was performed using the Chromium, Total value submitted in the NY-2C application as if it were a value for Chromium, Hexavalent to determine whether there was a contravention of the water quality standard. As no reasonable potential to violate the guidance value was found, no limit is required for Chromium, Hexavalent.

Selenium, Total; Total Dissolved Solids; Chromium, Total; and Chloroform are toxic pollutants. Per the 6 NYCRR 703.2 narrative water quality standard for Taste-, color-, and odor-producing, toxic and other deleterious substances, there shall be "*None in amounts that will adversely affect the taste, color or odor thereof, or impair the waters for their best usages.*" Whole Effluent Toxicity (WET) testing action levels are being added into the SPDES permit, in accordance with TOGS 1.3.2, for Outfall 002 to ensure that "*no chemicals are discharged to surface waters in amounts toxic to aquatic life.*" This is, in part, because "*there is the presence of substances in the effluent for which ambient water quality criteria do not exist*" (TOGS 1.3.2).

### Comment 3C: "III. Temperature

Outfall 003 is a subsurface, once-through cooling water structure, which discharges hot water directly into the Hudson River. DEC placed a daily maximum limitation on Outfall 003 of 104 degrees Fahrenheit.<sup>9</sup>

#### A. Decreased Thermal Limit

Under 6 NYCRR part 740.2(b)(5)(i), the water temperature at the surface of an estuary (i.e., the Hudson River) shall not, at any point, be raised more than 90 degrees Fahrenheit. Riverkeeper believes that the current thermal limitation of 104 degrees in the Outfall 003 effluent is insufficient for complying with the thermal discharge criteria in 6 NYCRR 704.2 and urges the DEC to lower the thermal discharge limitation to 90 degrees Fahrenheit.

The criteria laid out in 6 NYCRR part 704.2 were designed to protect aquatic life from the lethal conditions that high water temperatures can create. Elevated water temperatures can decrease the level of dissolved oxygen in the waterbody, which can lead to hypoxia and anoxia. Increased temperatures might prove intolerable for various aquatic biota and generate the perfect conditions for increased harmful microbial growth. The higher temperature can also act as a chemical catalyst in natural environments, exacerbating environmental harms resulting from excessive nutrients and toxins." (3)

Response 3C(A): See Response 2 for the explanation of the 104-degree Fahrenheit thermal limit.

#### B. "Year-Round Operation

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<sup>9</sup> Draft SPDES Permit, Consolidated Edison Company of New York, Inc. 59th Street Station NY0005134 at 6 (2023) [*hereinafter* "Permit"].



Con Ed has stated that its plant is operated for 118 days consecutively each year; essentially, Con Ed operates Outfall 003 for the entirety of the summer, give or take a couple of days. However, the SPDES permit allows Con Ed to discharge hot water from Outfall 003 all year-round. If Con Ed only needs 118 days to discharge from Outfall 003, then DEC should limit discharges under the SPDES permit for those 118 days.

The plant is unlikely to meet applicable water quality standards in 6 NYCRR part 704.1 if and when operating in the winter months. When discharging hot water up to 104 degrees Fahrenheit into cold water, the effluent is likely to upset the natural seasonal cycle<sup>10</sup> (704.1(a)(1)) and cause large day-to-day temperature fluctuations;<sup>11</sup> and cause the surface of the Hudson to be raised more than four Fahrenheit degrees.<sup>12</sup>

Aquatic organisms are finely adapted to natural and seasonal temperature regimes, so rapid increases or decreases in water temperature can increase mortality. In the springtime, when the water is cooler, the influx of heated water can create a heat island and any fish seeking to migrate upriver may stall within the heat island, delaying their essential migration.

Riverkeeper understands that Con Ed may need to discharge outside of that 118-day window for testing purposes. Riverkeeper, therefore, proposes that the DEC restrict discharging to that 118-day window, but include a provision requiring Con Ed to seek written approval from DEC should Con Ed need to discharge outside of the permitted window.” (3)

Response 3C(B): See Response 1 for the explanation of why the thermal effluent limit is not for a specific period of days. The thermal effluent limit applies year-round.

### C. “CORMIX Modeling and Lack of Monitoring

DEC performed a CORMIX analysis to determine that the thermal limit of 104 degrees satisfies the statutory requirement.<sup>13</sup> Riverkeeper is not satisfied with the use of modeling to determine whether the 104 degree limitation is sufficient for complying with the statute. Modeling does not reflect the actual conditions present at any given moment; the regulations requires that the surface temperature not exceed 90 degrees Fahrenheit *at any point*,<sup>14</sup> not under model-like conditions. Modeling is inappropriate for setting the thermal limitation in a waterway as dynamic as the Hudson River.

To ensure that Con Ed’s discharges do not cause the surface temperature to increase beyond the 90-degree limit, DEC should first perform dye testing. Dye testing would provide a better understanding of the size and shape of the thermal plume. DEC should also require temperature sensors at the water surface within the immediate vicinity of the

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<sup>10</sup> See 6 NYCRR § 704.2(a)(1)).

<sup>11</sup> See *id.* at § 704.2(a)(3)).

<sup>12</sup> See *id.* at § 704.42b)(4)(i).

<sup>13</sup> Fact Sheet, *supra* note 2, at 22.

<sup>14</sup> 6 NYCRR § 704.2(b)(1)(i).

thermal discharges from Outfall 003. Better understanding the contours of the thermal plume would help determine the most optimal placements for these temperature sensors. In the alternative, Con Ed could focus a thermal camera on the areas where the plume meets the surface of the estuary.” (3)

Response 3C(C): See Response 2 regarding DEC’s application of critical conditions in the CORMIX model and compliance with 6 NYCRR 704.2(b)(5).

Independent verification by DEC through dye testing is not required by regulation nor is it necessary, as a technical matter, given the outputs of the model.

Permits do not require particular technologies but do require compliance with the limits.

#### D. “Thermal Criteria Modification

In 2006, DEC issued a draft SPDES permit with a 90-degree maximum, consistent with the thermal discharge criteria under 6 NYCRR part 704.2(b)(5)(i). Subsequently, Con Ed requested that the maximum be increased to 104 degrees, which the DEC granted. This request constituted a request for a variance under 6 NYCRR part 704. Pursuant to 6 NYCRR part 704.4(d), Con Ed must consult with the DEC “to determine appropriate studies” to be conducted by the applicant prior to approval of a variance request.

The studies must include, at a minimum: (1) a comparative analysis of environmental impacts on the receiving waters and (2) an analysis of the different discharge modes. It seems that the applicant has not complied with these requirements. There is no indication in the previous permit or the current draft permit that Con Ed has completed *any* study that would satisfy these regulatory provisions. DEC must ensure that Con Ed has consulted with DEC *and* has completed the relevant studies prior to approving the permit modification.

In addition, 6 NYCRR part 704.4(e) requires a public hearing be conducted upon the application for a modification of the thermal discharge criteria. There is no evidence that such a public hearing has occurred and Riverkeeper urges the DEC to complete these statutory requirements before issuing the permit renewal. Such a public hearing must be informed by the requisite studies discussed above.” (3)

Response 3C(D): The thermal limit 104-degree Fahrenheit for Outfall 003 is not a variance as it meets the criteria under 6 NYCRR 704.2(b)(5).

See Response 2 for the explanation of the 104-degree Fahrenheit thermal limit.

#### Comment 3D: “IV. Sampling Total Suspended Solids (TSS)

DEC placed effluent limitations and monitoring requirements for Total Suspended Solids on Outfalls 02A, 02B, 02D, and 02E.<sup>15</sup> For Outfalls 02A, 02B, and 02D, Con Ed must take

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<sup>15</sup> Permit, *supra* note 10, at 4–5.

samples twice-a-month using grab sampling; however, for Outfall 02E, Con Ed must take weekly samples using grab sampling. Riverkeeper would like to see Outfalls 02A, 02B, and 02D change sampling frequency to weekly, or, alternatively, would like an explanation as to the reasons why the DEC permitted these differences in sampling frequency.” (3)

Response 3D: Per TOGS 1.2.1, there are numerous factors that can impact sampling frequency in SPDES permits including, but not limited to: “compliance history, pollutants involved, discharge volume, receiving water size, wastewater variability, treatment system type, frequencies required of similar permittees, and/or type of monitoring requirement”.

The permit requires the permittee to sample Outfalls 02A, 02B, and 02D 2/month. These sampling requirements are specified in previous iterations of the SPDES permit for this facility. Outfall 02E has multiple wastestreams being discharged through it for ultimate discharge through Outfall 002 including tunnel sump; steam condensate; stormwater; equipment drains, leaks, and overflows; fire system test water; and floor trenches/sumps. Due to the wastestreams comingling, increased monitoring is appropriate. The permit requires the permittee to sample Outfall 002 weekly. Additionally, pursuant to 6 NYCRR 750-2.5(a)(2)(i), Con Edison must take representative samples – a representative sample is one that accurately reflects the actual condition of the wastewater. Therefore, considering there have been [no exceedances of the permitted limits at these outfalls](#), the continuation of the current sampling frequencies for these outfalls is appropriate.

#### Comment 3E: “V. Impingement and Entrainment

Riverkeeper lauds the DEC’s decision to require an impingement mortality and entrainment characterization study. However, Riverkeeper believes that certain aspects of the study could be improved upon. DEC placed a sampling condition on any instance where 1,000 fish are impinged in a 24-hour period. Riverkeeper believes that if the permittee impinges more than 1,000 fish in a single day, the consequences should be greater than initiating an additional 24-hour collection. Riverkeeper urges the DEC to restrict such impingement and decrease the number of impinged fish necessary for that additional round of sampling. Furthermore, the study does not mention any monitoring for larvae, eggs, and juveniles, all of which are equally, if not more so, susceptible to impingement and entrainment. DEC should include larvae, eggs, and juveniles within the parameters of the study.

Regardless of the study’s outcome, DEC should place maximum restrictions on the water intake velocity, to be further restricted if the best technology available allows. The EPA determined that a “design-through screen velocity of 0.5 [feet per second] is protective of 96 percent of motile organisms.”<sup>16</sup> Riverkeeper would like to see Con Ed’s intake velocity permitted to at most 0.5 feet per second.” (3)

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<sup>16</sup> NPDES—Final Regulations To Establish Requirements for Cooling Water Intake Structures at Existing Facilities and Amend Requirements at Phase I Facilities, 79 Fed. Reg. 48300, 48345 (Oct. 14, 2014), <https://www.govinfo.gov/content/pkg/FR-2014-08-15/pdf/2014-12164.pdf>.

Response 3E: Through the permit, DEC requires rigorous sampling to accurately assess impingement and entrainment at a facility. The detailed requirements of the *Impingement Mortality and Entrainment Characterization Study* are in the SPDES Biological Monitoring Requirement 1(c) for impingement, and 1(d) for entrainment. Entrained organisms include eggs, larval, and juvenile fish. The *Impingement Mortality and Entrainment Characterization Study* sampling protocols described in Con Edison's 59<sup>th</sup> St. SPDES permit are consistent with biological sampling procedures found in other SPDES permits.

A best technology available (BTA) determination is site-specific and requires knowledge of the biological community affected by the facility, as well as operating conditions and constraints of the facility. The *Impingement Mortality and Entrainment Characterization Study* provides that information. The DEC will consider all technologies and operational measures capable of being implemented by the permittee, including limiting intake velocity, when making a BTA determination at the 59<sup>th</sup> St. Station.

#### D. Assembly Member Deborah J. Glick

Comment 4: "It's my understanding that the chemical discharge from the Pier 98 facility has minimal impact on members of the public and their use of the waterway. However, it is critical that DEC require Con Edison to take all possible steps to protect the fish and other animals in the estuary, from both chemical discharge and thermal impacts. This could include requiring Con Edison to release river water when the tide is not slack, or restricting their permit to the number of days they are actually releasing water (roughly 188).

More generally, I urge DEC to work with Con Edison to transition the Pier 98 facility to newer technologies that would require less river water and therefore lessen the overall impacts on the river and estuary. As New York City increasingly works to lower our reliance on fossil fuels, there will be greater demands on our electric grid and facilities like those at Pier 98 will likely need to expand their operations, meaning that transitioning to the most efficient technologies with the least environmental impacts is more necessary than ever."

Response 4: See Response 1 for the explanation of why the thermal effluent limit is not for a specific period of days.

See Response 2 for the explanation of the 104-degree Fahrenheit thermal limit.

See Response 3B for an explanation on WET testing.

See Response 3C(C) for an explanation on specific technologies.