

Bellevue EAS Comment #6-Response Table

Date: 1/16/25

EAS Page No	Review Comments /Questions	Response type-Concur or disagree	Response to comments/questions	Resolved? (Yes/No/Ongoing)
EAS Full Form Pg2	Update to 2026, update 'startup and consistency.	Concur	Updated	Yes
15	Use this figure throughout the document for consistency.		Noted and updated.	Yes
15	What is the thermal output of the CHP system? (see Table 8)		Thermal output of the CHP system is 94689.36 MMBTU/yr	Yes
15-16	The phrase "... provide continuous power and heat to the hospital in the event of an outage is confusing". For instance, elsewhere it is mentioned that the CHP system will operate on 24x7x365 days. Therefore, "... in the event of an outage" is self contradicting and confusing. Review, confirm, and rephrase the sentence for clarity.		Updated language to clarify.	Yes
17	Rephrase - just say the equipment was installed.	Concur	Updated	Yes
17	Compare this sentence with the previous comment on ..." in the event of an outage" . Review and confirm.		Confirmed.	Yes
18	Clarify Task#1: ...24 hr/day baseload operation vis.a.vis in the event of an electricity utility outage.... It seems to imply that the CHP system will operate on need-basis only. Review and rephrase for clarity		Rephrased.	Yes
18	Compare this sentence with Task#1 in the previous comment		Removed sentence.	Yes
18	Use 1982 kW instead of 2 MW for consistency		Updated.	Yes
19	Quantify thermal waste energy and add figures within brackets/parentheses		Quantified and added	Yes
18	Refer Appendix E: Energy model where total energy saved by CHP system for calculating GHG emissions etc.		Energy model used to update GHG emissions calculations. See Table 9.	Yes
18	This figure of savings includes among others also savings from the cost of avoided gas as shown in Appendix E. This savings on the cost of avoided gas should also be accounted for in the GHG emissions calculation in Table 9. or alternatively provide cogent reason and justification as to why it was included in the Energy model on the one hand and not accounted for in the GHG emissions calculation on the other. Review and confirm.		As shown in Appendix E, the CHP is the only equipment at the facility that will consume natural gas. The No-Action scenario has no natural gas consumption. Thus, there is no "avoided gas". There is only the natural gas which will be consumed by the CHP.	Yes
19	Revisit this statement after revisiting the GHG emissions calculation after taking into account total energy saved (see Appendix E: energy model).		Percent increase has been updated.	Yes
18-19	Simplify this -simply say installation began in 2022 but operation won't begin until CEQR is complete and operating permits are in place?		It is our opinion that these details of the project timeline support the reader in understanding the scope of the project. Are you suggesting that we remove the bullet points or add a bullet point saying that operation wont begin until CEQR is complete?	No
21	In Figure 4, clearly show 400 feet boundary around the proposed project site. Redo Figure 4 with clear 400 feet boundary		Figure updated.	Yes
22	Delete this phrase and remove Appendix L. A brief discussion on parking would not be impacted should suffice.		Updated and removed	Yes
24	What is the top rectangle above the project location rectangle? Label it or delete it if it does not add value to the figure		Deleted top rectangle.	Yes
25	Add here the consistency statement for WRP Policy 6.2. Review and confirm.		Added Policy 6.2- language was already included in summary.	Yes
26	Use 1982 kW for consistency and accuracy		Updated.	Yes

	Clearly show the amount of district steam displaced by the CHP system.			
28	What quantity of fuel (gas, fuel oil) was offset by CHP system and what is the avoided emissions? Refer Energy savings figures in Appendix F: Energy model for calculating facility energy consumption before and post CHP system installation		District steam displaced by CHP (steam avoided) has been added to Table 9.	Yes
28	Clarify - should this be electricity and heat?		Corrected.	Yes
29	Revisit this statement after revisiting the overall energy consumption and energy saved post CHP system installation. See Appendix F: Energy model for Total energy savings clearly broken down in terms of individual components such as utility electricity, gas, steam		Statement has been revised. While facility-wide GHG emissions will increase by approximately 7%, electricity demand and steam demand from the utility company will decrease.	Yes
30	Use the same number of significant figures. (So use the existing NOx emissions to the nearest tenth of a ton - i.e. - 14.0.)		Values have been updated and use the same number of significant figures.	Yes
30	Confirm NYS standards should be mentioned (or are these all from NAAQS?).		NYS standards removed from title.	Yes
33	Edit - this appears to be an incomplete sentence.		Rephrased.	Yes
36	Are all exceedances at air intakes, or are there any where the filtration system wouldn't provide mitigation?		Updated that exceedances occurred at air intakes. Discussion following.	Yes
36	See comment about updating the affidavit. Focus discussion below on what is being committed to (MERV-15 with 90% or greater filtration efficiency for 13th and 22nd floors of H-Building.)		Please clarify- we don't see another comment about updating the affidavit. Included discussion to reflect that the Hospital has committed to the installation of MERV-15 filters with 90% filtration efficiency below Table 6.	Yes
38	Confirm this is necessary if the project is described as operating 24/7.		Deleted.	Yes
41	Appendix E or appendix F is for energy model Review and confirm		Confirmed Appendix E.	Yes
42	Need to be definite.		Revised. No change for emergency generators between No-Action and With-Action scenarios.	Yes
42	Not clear what value does this sentence add to the narrative. Rephrase/elaborate the sentence for clarity Review and confirm.		Sentence removed for clarity.	Yes
42	Add 'hyphen' as in With-Action and No-Action throughout the document for consistency.		hyphen is there	Yes
42	Use 1982 kW x 2 for consistency. See earlier comments		Updated.	Yes
42	Revise the phrase 'Peak Load' since it is a 24/7 operation.		Rephrased.	Yes
42	Elaborate or explain this sentence simply to make it more accessible to general readers. Clarify what this is the central message of this sentence. Review and confirm.		Clarified and simplified statement to make it more accessible to general readers.	Yes

43	<p>Keep/Use LL97 emission factor -0.000288962 tons CO2e/KWh for electricity purchased as is for consistency. Instead convert energy usage from KBTU to KWh for utility electricity.¶</p> <p>Add the amount of fuel (gas in Therms) saved under With-Action scenarios in addition to the utility electricity saved and district steam displaced in the GHG calculation to account and include all the parameters (Refer Appendix E: Energy model for total energy saved¶)</p> <p>See total energy cost savings from the potential avoided electricity/gas purchased from Con ED (see Appendix E).</p>		<p>Concur with adding avoided electricity and steam from the grid. Disagree with changing LL96 emission factor to tons CO2e/KWh. Emission factor was converted for simplified comparison for the reader.</p> <p>LL97 emission factor is converted to KBTU/yr for electricity to be able to directly compare emissions from electricity consumption with steam/fuel consumption.</p> <p>Values were revised to be consistent with the energy model.</p> <p>Electricity and steam avoided have been added to the table.</p>	No
	<p>Repetition</p> <p>Review and confirm</p>		<p>Confirmed.</p>	Yes
43	<p>Also add: the amount of gas and district steam consumption reduced/avoided post CHP system installation.</p> <p>Also see earlier comments</p> <p>(see Appendix E: energy model)</p>		<p>Steam avoided added. There is no gas avoided since the facility does not have any equipment that consumes gas in the No-Action scenario. Table 9 updated to include values from the energy model for consistency.</p>	Yes
44	<p>Use data from the Energy model for consistency</p>		<p>Updated.</p>	Yes
44	<p>Use data from the Energy model/exhibits for GHG emission calculation for consistency, verifiability and validity.</p>		<p>Updated using data from energy model for consistency.</p>	Yes
44	<p>Revisit the GHG emissions calculation</p> <p>Also refer Appendix E especially wrt total energy savings (US\$) from the avoided electricity and gas supplied by Con ED post CHP installation.</p> <p>Review, reconcile and confirm.</p>		<p>GHG calculations updated and confirmed. Avoided steam and natural gas consumption from CHP consistent with energy model.</p>	Yes
44	<p>Edit this for consistency with rest of document. For instance, don't say 24/7, 365, and don't speak to whether the increase is or isn't surprising.</p>		<p>Updated.</p>	Yes
	<p>Compare this to 8328 Hrs elsewhere</p> <p>Review and confirm.</p>		<p>Confirmed should be 8328 hours.</p>	Yes
45	<p>Revisit the statement after revisiting the GHG calculating after taking into account: i) utility electricity avoided, ii) fuel/gas avoided and iii) district steam avoided post CHP system installation.</p> <p>See if the GHG emissions figures under With-Action and No-Action changes if any.</p> <p>Rephrased for clarity. Review and confirm.</p>		<p>Statement updated to reflect GHG calculation revisions.</p>	Yes
45	<p>Explain how the facility does or doesn't comply with or without the CHP in 2024-2029 and 2030-2034. The equipment design life doesn't have anything to do with it.</p>		<p>Updated. Language added to explain how facility complies with 2024-2029 limits and does not comply with 2030-2034 limits.</p>	Yes