

COUNCIL ON ENVIRONMENTAL QUALITY



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VIA ELECTRONIC MAIL

August 26, 2026

Mr. James Grillo
Bureau of Air Management
Department of Energy and Environmental Protection (DEEP)
79 Elm Street
Hartford, CT 06106-5127
james.grillo@ct.gov

Re: Notice of Tentative Determination to Approve Point Source New Source Review Permit Applications - Iroquois Gas Transmission System, L.P.

Dear Mr. Grillo,

The Council on Environmental Quality (Council) provides the following comments in response to the Department of Energy and Environmental Protection's (DEEP) Notice of Tentative Determination to Approve Point Source New Source Review Permit Applications for the Iroquois Gas Transmission System in Brookfield, Connecticut

The Council notes that on July 30, 2025, DEEP issued a tentative determination to approve New Source Review permits for two new combustion turbine natural gas compressors (Permit Nos. 028-0029 and 028-0030) and two (2) modified combustion turbine natural gas compressors (Permit Nos. 028-0027 and 028-0028) for Iroquois Gas Transmissions System L.P. (Applicant). Between July 17 and July 22, 2026, the Applicant submitted requests to increase the annual carbon monoxide (CO) emission limits in the July 2025 permits for the new combustion turbine natural gas compressors from 1.65 tons per year to 4.65 tons per year; increase the annual CO emissions after the installation of the oxidation catalyst (Phase 2) from 0.7 tons per year to 3.7 tons per year for permit 028-0027 and from 0.9 tons per year to 3.9 tons per year for permit 028-0028 to account for the corrections made to startup and shutdown emissions. The Applicant noted that the previously submitted information did not represent anticipated emissions based on historical and anticipated runtime, startups, and shutdowns.

The Council notes that while Connecticut is in attainment for the 8-hour National Ambient Air Quality Standard (NAAQS) for CO, the NY-NJ-CT Area (which includes Fairfield County) is in severe non-attainment for the 2008 Ozone Standard, and the "Greater Connecticut Area" is in serious non-attainment for the 2015 Ozone standard.¹ And because CO acts as a precursor to ground-level ozone through photochemical oxidation reactions in the presence of sunlight, the Council is concerned that the proposed increase in CO emissions associated with the operation of the proposed combustion turbine natural gas compressors could prevent or interfere with the attainment or maintenance of the applicable ambient air quality standards for ground level ozone. The Council recommends that DEEP not only consider and assess the impact of the proposed increase in CO emissions on public health and the environment, but also carefully consider if the proposed CO emissions could

prevent or interfere with the attainment of the applicable ambient air quality standards for ground level ozone, consistent with the provisions of the Regulations of Connecticut State Agencies (RCSA) Section 22a-174-3a(d)(3).

The Council also notes that Part VI Stack Emission Test Requirements for the two (2) modified combustion turbine natural gas compressors (Permit Nos. 028-0027 and 028-0028) would require the Permittee to “conduct recurring Phase 1 CO testing once every 5 years from the date of the preceding CO test or the date the CO test was due, whichever occurs first” and that Phase 2 testing for NOx and CO be done “once every 5 years from the date of the preceding tests or the date on which such tests were due, whichever occurs first.” Further, the Stack Emission Test Requirements for the two new combustion turbine natural gas compressors (Permit Nos. 028-0029 and 028-0030) would require the Permittee to “conduct initial stack testing within 60 days of achieving the maximum production rate, but not later than 180 days after initial startup” and then recurrent stack testing for CO to be “conducted within five years from the date of the previous stack test.” Since the permits state that “the commissioner retains the right to require stack testing of any pollutant at any time to demonstrate compliance,” the Council suggests that DEEP consider increasing the frequency for the Phase 2 testing to better ensure compliance with the approved CO emission limits.

Thank you for your consideration of the Council’s comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Aresta", with a stylized flourish at the end.

Paul Aresta
Executive Director

c. Paul Farrell, Connecticut DEEP, Bureau of Air Management, Planning and Standards Division

ⁱ Voluntary Reclassification of CT Nonattainment Areas for the 2015 Ozone NAAQS, 8/08/2024; [2-epas-ozone-reclassification-for-sw-ct--greater-ct-ozone-nonattainment-areas.pdf](#)