

**STATE OF CONNECTICUT
DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
OFFICE OF ADJUDICATIONS**

IN THE MATTER OF : **APPLICATION NOS.**
202003147,
202003148, 202003146, 202003805

**IROQUOIS GAS TRANSMISSION
SYSTEM L.P., BROOKFIELD** : **JULY 27, 2026**

HEARING OFFICER REPORT

**I.
PETITION FOR HEARING**

On July 31, 2025, the Department of Energy and Environmental Protection (“DEEP”) issued a Notice of Tentative Determination to approve the above-captioned applications submitted by Iroquois Gas Transmission System, L.P. (“the Applicant”). The Office of Adjudications received three petitions for a hearing in this matter: from the Town of Brookfield on September 10, 2025; Stop the Brookfield Compressor Station Expansion on September 15, 2025; and Save the Sound on September 16, 2025.

The Petitions were reviewed pursuant to Public Act 25-84, and the Office of Adjudications determined that this matter would proceed as an Informational Public Hearing and was not a contested case subject to the requirements of Chapter 54. This report summarizes the public process that ensued.

**II.
HEARING AND COMMENTS**

The Informational Public Hearing was held on January 8, 2026, at 5:00 PM via Zoom. Presentations were made by DEEP staff and the Applicant, and public comments were received. The deadline for written comments was January 15, 2026. On July 24, 2026, DEEP staff issued a Comment Response Document, which is attached to this report (“Attachment I”). With the submission of the Comment Response



Connecticut
Department of Energy &
Environmental Protection

Document, DEEP staff advised that the Department has issued a new Notice of Tentative Determination to approve revised draft permits: [Iroquois Gas Transmission System LP 2nd Notice 07242026](#).

III. CONCLUSION

This report confirms the conclusion of the Informational Public Hearing process related to DEEP's July 31, 2025 Notice of Tentative Determination.

Kathleen Reiser

Kathleen Reiser
Hearing Officer

cc: Service List

**January 8, 2026 Public Informational Hearing
Response To Comments
&
Notice of Tentative Determination to Approve Revised Permits**

TO: Tracy Babbidge, Chief, Bureau of Air Management
Emma Cimino, Acting Commissioner of Environmental Protection
Date Rec'd: 03/02/2020
SIMS Nos.:
202003147, 202003148 (New Units)
202003146, 202003805 (Modified Units)

FROM: Jaimeson Sinclair, Director, Engineering Division, Bureau of Air Management
Louis Corsino, Supervising Air Pollution Control Engineer
James Grillo, Air Pollution Control Engineer

SUBJECT: Notice of Tentative Determination to Approve Revised Permits for Iroquois Gas Transmissions System L.P.: (2) New Combustion Turbine Gas Compressors (Permit Nos. 028-0029 and 028-0030) and (2) Modified Combustion Turbine Gas Compressors (Permit Nos. 028-0027 and 028-0028)

This document comprises a summary of and responses to 428 written and oral comments received from the public related to the Department of Energy and Environmental Protection's (DEEP or Department) Tentative Determination to issue permits to Iroquois Gas Transmission Systems L.P. (Iroquois or Applicant) for two new and two modified combustion turbine gas compressors. The written and oral comments received address 36 areas of concern, which have been designated as "Comment Threads" in this document. Each Comment Thread is summarized, followed by a list of the comments addressing the thread, and then by the Department's response. The Comment Threads represent groupings of common concerns or topics and are not based on either the chronological order in which comments were received or the importance of the individual comments.

After careful consideration of the comments received and in accordance with Regulations of Connecticut State Agencies (RCSA) Section 22a-174-3a(d)(1), the Department revised the draft permits to require Continuous Emissions Monitoring Systems (CEMS) to ensure compliance with the Nitrogen Oxide (NOx) emissions limits of the permits. Additionally, Iroquois requested to increase some of the carbon monoxide (CO) limits in the original draft permits. To provide notice and the opportunity for comment on those increased CO limits, the Bureau of Air Management will publish notice of a tentative determination to approve revised draft permits with the higher CO emissions limits. The notice will initiate a 30-day comment period during which the public may comment on the revised draft permits and request a hearing in accordance with applicable regulations and statutes. The Department intends to render a final decision on these permits after the conclusion of the comment period and any requested hearing.

Summary of the Original Tentative Determination, Public Informational Hearing, and Post Hearing Requests

- o On July 31, 2025, Iroquois was issued a Tentative Determination for two (2) New Combustion Turbine Gas Compressors (Permit Nos. 028-0029 and 028-0030) and two (2) Modified

Combustion Turbine Gas Compressors (Permit Nos. 028-0027 and 028-0028). The public notice was published in the News-Times on July 31, 2025. In response to several requests to extend the comment period, the Department extended the comment period until September 16, 2025. On November 20, 2025, the Department published a notice of a virtual public informational hearing to be held on January 8, 2026.

Comments were received by the Department throughout the technical evaluation, Tentative Determination, and Post-Informational Hearing timeframes for these applications. The Department accepted comments from the Informational Hearing until the close of business on January 15, 2026. Comments have been categorized according to the timeframe within which they were received:

- Written comments received prior to the Tentative Determination are identified as P1 through P20.
- Written comments received during the Tentative Determination comment period are identified as Nos. 1 through 230.
- Oral Comments received during the Informational Hearing are identified as O1 through O42.
- Written comments received after the Informational Hearing are identified as H1 through H189.

See *Appendix A* for a list of written commentors and *Appendix B* for the transcript of the Informational Hearing held on January 8, 2026. The comments and the responses are listed below.

In considering and responding to the multitude of comments, the Department determined that requiring NOx CEMS was reasonable and appropriate for ensuring compliance with the NOx limits proposed in the draft permits. Since the revised draft permits represent the first time that NOx CEMS will be required on pipeline compressor turbines in Connecticut, arriving at this determination required independent research and discussion with Iroquois, which extended the amount of time needed to respond to the comments.

On July 10, 2026, Iroquois requested that the Department extend the period to issue its responses to the comments obtained during and following the hearing. On July 17, 2026, July 20, 2026, and July 22, 2026; Iroquois submitted a request to increase the CO emissions limits of the permits and supporting documentation. The Department reviewed the requests and determined that it would be appropriate to issue this response to comments document and issue a notice of tentative determination to approve revised draft permits incorporating the NOx CEMS and the increase in CO emissions limits requested.

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I. Response to Comments

Comment Thread 1: Emissions of Criteria Pollutants from the Project result in unnecessary and unreasonable pollution, particularly for emissions of Ozone Precursors in an area that is designated as a Severe Ozone Non-Attainment area.

Many commenters stated that the emissions of Nitrogen Oxides (NO_x), Volatile Organic Compounds (VOC), carbon dioxide (CO₂), carbon monoxide (CO), sulfur dioxide (SO₂), nitrous oxide (N₂O), methane and particulate matter (PM) expose residents to unnecessary health risks due to air quality, negatively impact public health (particularly for sensitive groups, such as those with pre-existing conditions like asthma, heart disease, or cancer), and contribute to early mortality, neurotoxicity, and safety issues. Commenters state that the project will result in a substantial increase in NO_x emissions, deteriorate air quality, negatively affect air resources, and emit unreasonable ozone precursor pollution in an ozone non-attainment area. According to commenters, air quality in Fairfield County is already poor, arguably the worst air quality on the east coast and in New England. They assert that The American Lung Association scored Fairfield County with an “F” for Ozone ([Connecticut | State of the Air | American Lung Association](#)). Commenters argue that there is no justification to allow the expansion of this facility on ethical, moral, public health & safety, or economic bases. Commenters cited several examples of peer reviewed studies describing the harmful effects of compressor stations, which they argue result from emissions of dangerous/highly toxic (hazardous) emissions. Commenters argue that compressor stations cause serious health risks and are major sources of hazardous air pollutants (HAPs).

[Commenters 1, 2, 3, 4, 5, 6, 7, 8, 9, 11, 12, 13, 16, 19, 20, 21, 22, 23, 25, 27, 28, 29, 30, 32, 33, 34, 35, 36, 37, 39, 40, 41, 42, 43, 44, 46, 47, 51, 52, 53, 55, 56, 58, 59, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 73, 74, 75, 76, 77, 78, 79, 80, 81, 83, 84, 85, 86, 87, 88, 89, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 107a, 108, 109, 110, 111, 112, 113, 114, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 140, 141, 142, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 165, 169, 170, 171, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 196, 197, 198, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 229, 230, H1, H4, H6, H7, H8, H10, H13, H14, H16, H17, H18, H23, H24, H25, H26, H29, H31, H32, H39, H40, H41, H42, H43, H43, H44, H47, H48, H50, H51, H53, H55, H57, H58, H59, H60, H61, H64, H65, H66, H67, H69, H72, H74, H75, H76, H77, H80, H81, H82, H83, H84, H85, H86, H87, H88, H89, H90, H92, H93, H94, H95, H96, H97, H98, H99, H100, H101, H102, H103, H104, H105, H106, H107, H108, H109, H110, H111, H112, H113, H114, H115, H116, H117, H118, H119, H120, H121, H122, H123, H124, H125, H126, H127, H128, H129, H130, H131, H132, H133, H134, H135, H136, H137, H138, H139, H140, H141, H141a, H142, H143, H144, H145, H146, H147, H148, H149, H150, H150a, H152, H153, H154, H155, H156, H157, H158, H160, H161, H162, H163, H164, H165, H166, H167, H168, H169, H170, H171, H172, H173, H174, H175, H176, H177, H178, H179, H180, H181, H182, H183, H184, H187, H188, P7, P8, P9, P10, P11, P13, P14, P15, P16, P17, P18, P19, P20, O4, O5, O11, O12, O13, O14, O15, O16, O17, O20, O22, O25, O26, O27, O28, O31, O33, O34, O35, O36, O39, O40]

Response to Comment Thread 1:

The quality of ambient air is determined by the Department and the Environmental Protection Agency (EPA) based on compliance with the National Ambient Air Quality Standards (NAAQS) for Criteria Air Pollutants, specifically for Nitrogen Dioxide, Sulfur Dioxide, Carbon Monoxide, Lead, Particulate Matter and Ozone. The NAAQS are a tool to protect public health and the environment. The Clean Air Act requires EPA to set the NAAQS for these pollutants, which are common in outdoor air, considered harmful to public health and the

environment, and come from numerous and diverse sources. EPA publishes extensive resources on the Criteria Air Pollutants and the processes for setting and reviewing the NAAQS on its website at: [Criteria Air Pollutants | US EPA](#). The process involves evaluating the health impacts and risks of exposure to each pollutant over periods of time.

EPA requires DEEP to continuously monitor the concentration of these pollutants in the ambient air at fourteen air quality monitoring stations located around the state, using EPA approved methods to demonstrate that ambient air quality meets the applicable NAAQS, as amended from time to time. DEEP publishes its findings regarding monitored air quality at: [Air Monitoring in Connecticut](#). Further, EPA reviews DEEP data and promulgates a designation of attainment status with the applicable standards. The Attainment Designations are published in the Federal Register and on the EPA's website.

Ambient concentrations of criteria pollutants in Connecticut have significantly declined, and such concentrations are verified as below every NAAQS, except the 2008 Ozone NAAQS in Fairfield County and the 2015 ozone NAAQS statewide. In the most recent attainment demonstration released for public comment in December of 2025, Connecticut projected that Fairfield County may plausibly attain the 2008 Ozone NAAQS by July 20, 2027. See [2008 Severe SIPDraftPublicHearing.pdf](#). Further, policy and control measures are being implemented in pursuit of attainment and maintenance of the 2015 Ozone NAAQS.

A review of the Connecticut air monitoring data shows that current design values are at or near historic lows for every pollutant, including ozone. Connecticut's monitored data shows that the ambient air quality is considerably better than in the recent past. Any grade given to Connecticut air quality by a non-regulatory body, like The American Lung Association, must be taken in the context of the specific aims of that non-regulatory body and are not directly actionable by the Department based on its regulatory authority.

DEEP's air permit program is designed to protect attainment and maintenance of the applicable NAAQS and is codified at RCSA Section 22a-174-3a. The portions of RCSA Section 22a-174-3a applicable to Iroquois' permit applications are approved by EPA as part of Connecticut's State Implementation Plan, as set forth in 40 CFR 52, Subpart H. As such, any permit issued thereunder is both state and federally enforceable.

Pursuant to RCSA Section 22a-174-3a(d)(3), DEEP shall not issue a permit for a new or modified source of air pollution unless an applicant demonstrates to the Commissioner's satisfaction that the proposed new source or modification to an existing source can operate without preventing or interfering with attainment or maintenance of any applicable NAAQS in Connecticut or neighboring jurisdictions. An applicant makes such a demonstration by submitting emissions modeling performed in accordance with 40 CFR 51, Appendix W, RCSA Section 22a-174-3a(i), and the Department's Ambient Air Quality Analysis Guidelines.

Iroquois performed the required modeling and demonstrated it can operate the new and modified turbines in compliance with the draft permits, without preventing or interfering with attainment or maintenance of a NAAQS in accordance with applicable federal and state law for predicting pollutant concentrations and determining compliance with NAAQS.

The DEEP recognizes that a determination that operation of the new and modified turbines can occur without impacting attainment seems counterintuitive because the state does not attain the applicable ozone NAAQS. However, ozone is a secondary pollutant that is not directly emitted by the turbines or most other stationary sources, in appreciable quantities. The applicable modeling regulations and guidance contain methodologies for estimating the impacts of ozone precursor emissions, specifically Nitrogen Oxides and Volatile Organic Compounds on background ozone values. As detailed in the technical evaluation and modeling analyses for the

new turbines and using the criteria set forth in the applicable modeling regulations and guidance, the Applicant demonstrated that its emissions of ozone precursors do not prevent or interfere with attaining or maintaining the ozone NAAQS. While this seems paradoxical, a review of [O₃ design values](#) shows that despite multiple air permits being issued for sources in and upwind of Fairfield County over the past 40 years, current design values, an indicator of monitored air quality, are at or near 40-year lows and approaching attainment. Further, there is no regulatory or statutory prohibition on issuing air permits for sources that emit ozone precursors in a designated ozone non-attainment area, solely based on its attainment designation.

There are no NAAQS for methane or carbon dioxide because neither pollutant is technically toxic or poisonous. However, both are greenhouse gases and believed to contribute to climate change. Connecticut has set progressive goals to limit emissions of greenhouse gases in its Global Warming Solutions Act (GWSA). Connecticut has made significant progress towards its statutory goals by advancing policies and strategies outlined in economy wide climate plans. These plans can be accessed at this link: [Climate Change](#). Some of these actions include participating in the Regional Greenhouse Gas Initiative, establishing and extending renewable portfolio standards that incentivize solar and wind generation, procuring non-emitting generation to serve in-state electric demand, adopting California-based clean car regulations (Advanced Clean Cars I), efforts to establish an incubator and accelerator for heat pump adoption, and many others. However, the GWSA goals are not directly enforceable for any particular entity and are distinct from the state's regulatory duties under the Clean Air Act. Further, the standards for granting an air permit set forth at RCSA Section 22a-174-3a(d)(3) do not require an applicant to demonstrate consistency with the GWSA goals.

Connecticut's statewide greenhouse gas inventory shows statewide greenhouse gas emissions for 2023, the most recent year with complete data, at 35 million metric tons of carbon dioxide equivalents (CO₂e). The anticipated increase in greenhouse gas emissions from the Iroquois proposal, at 80,000 metric tons CO₂e, would be ~0.22% of statewide emissions. Further, the installation of new turbines at the facility triggers the applicability of enhanced pipeline leak detection and repair requirements under 40 CFR 60, Subpart OOOOb, which may offset point of combustion greenhouse gas emissions from the turbines.

Commentors expressed concern regarding hazardous air pollutant emissions from Iroquois' proposed activities. As discussed in the technical evaluations for the new turbine permits and modified turbine permits, the hazardous air pollutant emissions from the facility were reviewed and considered in accordance with standards for RCSA Section 22a-174-3a(d)(3). The Applicant demonstrated that the potential emissions of federally regulated hazardous air pollutants as defined in Section 112 of the Clean Air Act and listed in 40 CFR 63 are below the major source thresholds. There are no requirements that would apply under 40 CFR 61, 40 CFR 63, or RCSA Section 22a-174-3a(m). However, the emissions from the turbines are subject to hazardous emissions limits under RCSA Section 22a-174-29. As described in the technical evaluations for the new and modified turbines, the Applicant demonstrated compliance with the applicable requirements of RCSA Section 22a-174-29 as required under RCSA Section 22a-174-3a(d)(3).

Comment Thread 2: Comments in Opposition to the Project from the Town Officials

The First Selectman, Board of Selectman, Board of Education, and Brookfield Democratic Town Committee submitted the following comments:

First Selectman S. Dunn Comments (Comment Nos. H20, O1)

Board of Selectman Comments (Comment No. 199)

Selectman Karl Hinger Oral Comment No. O5 (01/08/2026)

Selectman B. Beldon Comment No. 199 (09/2025); No. H88 (01/2026); No. O6 (01/06/26)

Board of Education Comment No. H54

Democratic Town Committee Comment No. 07 (01/08/26)

The comments from town officials primarily consist of the following:

- a. Why no electric motor driven (EMD) compressors when the emissions would be zero?
- b. Need for continuous ambient air testing around the compressor station.
- c. Permits are inconsistent with the State's Climate Policies.
- d. Town and citizens were denied an adjudicatory hearing.
- e. The Federal Energy Regulatory Commission (FERC) Environmental Impact Statement (EIS) is outdated.
- f. Best Available Control Technology (BACT) should be Energy Management Technology rather than gas compression.
- g. New rule should be enacted prohibiting natural gas facilities near schools or other vulnerable populations.
- h. Segmented permitting is unlawful to avoid major permitting thresholds.
- i. Permits should require barriers/fencing and other safety mitigation provisions in case of catastrophic events.
- j. Permits will cause public harm, especially with the school being so close.
- k. Current monitoring is inadequate to ensure compliance as stack testing is not representative of actual operation.
- l. DEEP has an obligation to protect vulnerable populations.
- m. No benefit to the town

[Response to Comment Thread 2:](#)

- a. *Why no electric motor driven compressors (EMD) when the emissions would be zero?*

See Response to Comment Thread 5, below. The Department appropriately reviewed electric motor drives and determined that Advanced SoLoNOx was BACT for emission of NOx and CO in accordance with RCSA Section 22a-174-3a(j)(7) and -3a(j)(8).

- b. *Need for continuous ambient air testing around the compressor station*

See response to Comment Thread 24.

- c. *Permits are inconsistent with the State's Climate Policies*

See response to Comment Thread 1.

- d. *Town and citizens were denied an adjudicatory hearing.*

See response to Comment Thread 8.

- e. *The Federal Energy Regulatory Commission (FERC) Environmental Impact Statement (EIS) is outdated.*

See response to Comment Thread 33.

- f. *BACT should be Energy Management Technology rather than gas compression.*

See response to Comment Threads 4 and 5.

- g. New rule making should be enacted prohibiting natural gas facilities near schools or other vulnerable populations.*

See response to Comment Thread 16.

- h. Segmented permitting is unlawful to avoid major permitting thresholds.*

See the response to Comment Threads 4, 5, and 31.

- i. Permits should require barriers/fencing and other safety mitigation provisions in case of catastrophic events.*

See response to Comment Thread 34.

- j. Permits will cause public harm, especially with the school being so close.*

See response to Comment Threads 1 and 10.

- k. Current monitoring is inadequate to ensure compliance as stack testing is not representative of actual operation.*

After careful consideration of the comments received from stakeholders, the Department is requiring the Applicant to install and operate (CEMS) to monitor and record emissions of NOx. The draft permits have been revised to reflect the use of NOx CEMS to determine compliance with applicable permit limits for the turbines. NOx CEMS shall be installed and operating on all four turbines in accordance with the permits and applicable state and federal law within 60 days of the new turbines reaching the maximum rated capacity of the units or 180 days of the new turbines first operating. The NOx CEMS must be operated and maintained in accordance with applicable state and federal law. The data recorded by the monitors shall be submitted to the Department for review to determine compliance with applicable emission limits. The Applicant shall be required to report to the Department any instance when the monitors are malfunctioning or not operating. Failure to operate the monitors as required or monitored emissions that exceed the limits of the permit are violations of the permit and applicable law, and will be subject to enforcement action. See also Response to Comment Thread 20.

- l. DEEP has an obligation to protect vulnerable populations.*

See response to Comment Threads 7, 10, 16, and 23.

- m. No benefit to the town*

See response to Comment Thread 5, item b.

[Comment Thread 3: Comments in Opposition to the Project from the State General Assembly delegation.](#)

State Rep Martin J. Foncello, Jr. submitted written comments against the project (Comment No. H185)

State Senator Stephen Harding submitted Written comments against the project (Comment No. H186)

State Senator Stephen Harding oral comments against the project January 8, 2026 (Comment No. 04)

The comments from the above state elected officials primarily consist of the following:

- a. Concerns about the proximity to the school and the effects of pollution
- b. Operational and Emergency risks due to equipment failures
- c. Noise, vibration, nighttime noise, increased blowdowns have cumulative effects on quality of life; public health and safety.
- d. Risks outweigh the benefits, burden of proof that the project meets regulatory requirements has not been proven.
- e. Lack of safety provisions and emergency preparedness in permits
- f. No adjudicatory hearing, need for a full transparent process

Response to Comment Thread 3:

- a. *Concerns about the proximity to the school and the effects of pollution*

See response to Comment Threads 1 and 10.

- b. *Operational and Emergency risks due to equipment failures*

See response to Comment Thread 34.

- c. *Noise, vibration, nighttime noise, increased blowdowns have cumulative effects on quality of life; public health and safety.*

See response to Comment Threads 19 and 24.

- d. *Risks outweigh the benefits, burden of proof that the project meets regulatory requirements has not been proven.*

See response to Comment Thread 5, Item b.

- e. *Lack of safety provisions and emergency preparedness in permits*

See response to Comment Thread 34.

- f. *No adjudicatory hearing, need for a full transparent process*

See response to Comment Thread 8.

Comment Thread 4: Comments in opposition to the project from Stop the Brookfield Compressor Station Expansion included in its petition:

- a. Address applicability of 40 CFR 60 Subpart KKKKa.
- b. CT DEEP cannot reasonably expect to fulfill its obligation of achieving attainment by continuing to permit the same way it has for the last 40 years, which has demonstrably resulted in further ambient air quality deterioration. Especially with lax enforcement and weak oversight of synthetic minor permits.
- c. EMDs were improperly evaluated EMDs in the Best Available Control Technology Review.

- d. CT DEEP's draft permit is unenforceable thus defective. The "hairline" permit conditions can't reasonably be expected to be adhered to given Iroquois own statements, nor does CT DEEP require monitoring methodology that would ensure enforcement should the permit conditions be violated.
- e. DEEP's narrow focus on NO_x and CO in evaluating the Brookfield ExC expansion is inconsistent with both its trustee obligations under CEPA and its broader authority under the Clean Air Act.
- f. The Selectmen of Brookfield and Brookfield's legislative delegation together represent constituencies totaling well over 100,000 residents, with townwide, House-district, and Senate-district coverage (ACS/2020 Census) and jointly oppose this project. Ignoring this bipartisan, multi-level opposition—while rejecting feasible, cleaner alternatives—would undermine the public's trust in CEPA's trustee mandate, particularly in a severe nonattainment county.
- g. This permit decision sets a dangerous precedent by allowing the Brookfield station to be "minor modified" into an arbitrarily large major source without ever confronting major source review.
- h. DEEP failed to comply with FOIA.
- i. Adjudicatory Hearing was not granted.
- j. Vulnerable populations and environmental justice were not evaluated correctly.
- k. Scientific & Public Health Evidence was not considered.
- l. Project offers no benefit to Connecticut.
- m. BACT is flawed.
- n. Segmented permitting is unlawful to avoid major permitting thresholds.
- o. Permits are inconsistent with State's Climate Change Policy
- p. Concerns with Air Quality and the NAAQS
- q. Ethical conflict between Energy and Environmental Protection
- r. Why isn't this project subject to Environmental Justice?
- s. Concerns with additional noise impacts
- t. DEEP ignored previous case history

[Comment H18, Comment H187]

Response to Comment Thread 4:

a. Address applicability of 40 CFR 60 Subpart KKKKa

The Department evaluated the applicability of the recently promulgated New Source Performance Standards (NSPS) for stationary gas turbines and determined that the units are subject to a limit of 15 ppmvd@15% O₂ throughout a limited range of operations. The proposed permits require the units to meet 9 ppmvd@15% O₂ throughout a broader range of steady state operation and contain specific limits on non-steady state operation. The emission limits included in the permits are more stringent than the recently issued NSPS. Compliance with the permits will ensure compliance with the NSPS.

- b. CT DEEP cannot reasonably expect to fulfill its obligation of achieving attainment by continuing to permit the same way it has for the last 40 years, which has demonstrably resulted in further ambient air quality deterioration. Especially with lax enforcement and weak oversight of synthetic minor permits.*

See Response to Comment Thread 1 regarding the improvement in ambient air quality in Fairfield County. Additionally, see Comment Thread 29 regarding the perception of lax enforcement. Finally, Connecticut's minor and major source air permitting programs are federally enforceable and approved in Connecticut's State Implementation Plan. Neither the EPA Office of Inspector General nor EPA Region 1 has ever determined that Connecticut's synthetic minor permits lack appropriate oversight.

Furthermore, Iroquois is a Title V source subject to frequent inspection, monitoring and emission testing requirements; including annual compliance certifications, biennial emissions tests, semi-annual monitoring submissions and prompt deviation reporting requirements.

c. EMDs were improperly evaluated in the Best Available Control Technology Review.

The Department required Iroquois to evaluate EMDs and support any assertions with information directly from Eversource, the local electric distribution company that provides power to the facility. The responses and analysis were submitted to the Department and included in the BACT Review as detailed in the Engineering Evaluation for the new turbine permits. The Department determined that EMDs were not Best Available Control Technology due to costs and collateral environmental and energy impacts associated with the technology. The Department appropriately reviewed electric motor drives and determined that Advanced SoLoNO_x was Best Available Control Technology for emission of NO_x and CO in accordance with RCSA Section 22a-174-3a(j)(7) and RCSA Section 22a-174-3a(j)(8). Also, see Response to Comment Thread 5, below.

d. CT DEEP's draft permit is unenforceable thus defective. The "hairline" permit conditions can't reasonably be expected to be adhered to given Iroquois' own statements nor does CT DEEP require monitoring methodology that would ensure enforcement should the permit conditions be violated. Under 40 CFR 49.167, any synthetic minor NO_x limit must be enforceable as a practical matter - that is, the permit must identify the emissions units, averaging period, and provide a monitoring method sufficient to ensure real-world compliance. DEEP's Draft Permit fails this standard.

The federal regulations cited, [40 CFR 49.167](https://www.ecfr.gov/current/title-40/part-49/subject-group-ECFR3575939da907988) apply to Federal Implementation Plans (FIP) specifically for the federal major new source review (NSR) program for nonattainment areas in Indian country. This federal regulation does not apply to the proposed new and modified permits for Iroquois's Brookfield Compressor Station. <https://www.ecfr.gov/current/title-40/part-49/subject-group-ECFR3575939da907988> Brookfield, CT is a nonattainment area but is not in Indian country.

Connecticut's minor and major new source air permitting programs, set forth at RCSA Section 22a-174-3a, are federally enforceable and approved in Connecticut's State Implementation Plan at 40 CFR 52 Subpart H. Upon issuance, the permit limits will be "federally enforceable" and "practicably enforceable" as those terms are defined in RCSA Section 22a-174-1. Additionally, as stated in the responses to Comment Thread 2, the permits were revised to require NO_x CEMS to demonstrate compliance with the emissions limits.

As discussed, the permits are not subject to 40 CFR Section 49.167. The permits are "federally enforceable" and "practicably enforceable" as those terms are defined in RCSA Section 22a-174-1. The requirement to implement a NO_x CEMS to demonstrate compliance with the NO_x limits enhances the Department's ability to enforce the permits.

e. DEEP's narrow focus on NO_x and CO in evaluating the Brookfield ExC expansion is inconsistent with both its trustee obligations under CEPA and its broader authority under the Clean Air Act.

The Department's review of the permit applications addressed all criteria pollutants and hazardous air pollutants. In accordance with RCSA Section 22a-174-3a(d)(3), the Standards for Granting and Renewing

a Permit, the Applicant demonstrated that the emissions of all criteria pollutants and hazardous air pollutants meet the applicable standards. See response to Comment Thread 32 regarding CEPA.

- f. *The Selectmen of Brookfield and Brookfield's State legislative delegation together represent constituencies totaling well over 100,000 residents, with townwide, House-district, and Senate-district coverage (ACS/2020 Census) and jointly oppose this project. Ignoring this bipartisan, multi-level opposition—while rejecting feasible, cleaner alternatives—would undermine the public's trust in CEPA's trustee mandate, particularly in a severe nonattainment county.*

The review of the permit applications was performed in accordance with the RCSA Section 22a-174-2a, RCSA Section 22a-174-3a, and the underlying statutes. In accordance with applicable law, public comments from constituents and elected officials are herein considered, responded to, and, in certain instances, acted upon, resulting in meaningful changes to the draft permits.

- g. *This permit decision sets a dangerous precedent by allowing the Brookfield station to be "minor modified" into an arbitrarily large major source without ever confronting major source review. That is the essence of segmentation—even if crafted to evade the technicalities of EPA's policy—and it marks the abuse of synthetic minor permitting that National Mining Ass'n v. EPA warned against when it held that limits must be "legally and practicably enforceable," not "chimerical" paper thresholds (59 F.3d 1351, 1363 (D.C. Cir. 1995)). Here, DEEP has imposed a razor-thin 24.9 tpy NOx cap—one-tenth under the major-mod trigger—yet declined to require continuous monitoring, relying instead on surrogate factors, fuel meters, and five-year stack tests. As Sierra Club v. EPA made clear, however, the Act requires monitoring "sufficient to assure compliance" on a continuous basis (536 F.3d 673, 675 (D.C. Cir. 2008)), and in Ogden Projects v. New Morgan Landfill, the court held that only restrictions that are "unquestionably and demonstrably effective" may be used to avoid major source status (911 F. Supp. 863, 869 (E.D. Pa. 1996)). The contradiction deepens because Iroquois itself acknowledges that frequent startups, shutdowns, and low-load operations—driven by uncontrollable demand—are inherent to its system, conditions that courts have held must be covered by continuous compliance obligations (Sierra Club v. EPA, 551 F.3d 1019, 1021 (D.C. Cir. 2008)). In this case, the site's exceptional circumstances—its proximity to a school, its location in a region forty years out of attainment, and its position at the nexus of two interstate pipelines with foreseeable expansions—mean that DEEP cannot simply rely on distinguished precedent from very different facilities like Weymouth. DEEP has the authority and obligation to treat this permit as exceptional and require enforceable, forward-looking controls, such as electric motor drives, rather than endorsing incremental, unmonitored growth that undermines the Clean Air Act's design.*

The proposed permits do not set a precedent. The permits are consistent with and arguably more stringent than recent permits expanding operations at three other compressor stations in Connecticut. Upon issuance, the permit limits become "federally enforceable" and "practicably enforceable" as those terms are defined in RCSA Section 22a-174-1. As discussed in the comment response thread 2, the permits have been revised to require NOx CEMS to demonstrate continuous compliance with the limits that enable this facility to be treated as a minor source permitting process. There is no regulatory or statutory requirement or obligation to treat this as a major modification, subject to major source permitting.

- h. *DEEP failed to comply with FOIA*

The Department provided access to file documents in accordance with applicable regulations and statutes.

i. Adjudicatory Hearing was not granted.

See response to Comment Thread 8.

j. Vulnerable populations and environmental justice were not evaluated correctly.

See response to Comment Threads 7, 10, 16, and 23.

k. Scientific & Public Health Evidence from third parties were not considered.

See response to Comment Threads 10 and 13.

l. Project offers no benefit to Connecticut.

See response to Comment Thread 5, item b.

m. BACT is Flawed

See responses to Comment Thread 4, Item c and Comment Thread 5 below.

n. Segmented permitting is unlawful to avoid major permitting thresholds.

See response to Comment Thread 5, below.

o. Permits are inconsistent with State's Climate Change Policy

See response to Comment Thread 1.

p. Concerns with Air Quality and the NAAQS

See response to Comment Threads 1 and 23.

q. Concerns with the appearance of an ethical conflict between Energy and Environmental Protection under one department.

See response to Comment Thread 7. Additionally, the Department of Energy and Environmental Protection was established by Public Act 11-80 and charged to perform this type of review.

r. Why isn't this project subject to Environmental Justice?

See response to Comment Thread 30.

s. Concerns with additional noise impacts

See response to Comment Threads 19 and 24.

t. *DEEP ignored previous case history*

See response to Comment Thread 4g.

Comment Thread 5: Comments in Opposition from Sierra Club with support and commentary from Bruce Buckheit

- a. Has Iroquois included its compliance obligations under 40 CFR 60 Subpart OOOOb?
- b. No need or benefit to Connecticut, just risk.
- c. Increased carbon emissions are inconsistent with Global Warming Solutions Act.
- d. Increased air pollution in a severe ozone non-attainment area, less than 1900 feet from Brookfield's only middle school
- e. Permits not enforceable; Improved monitoring and more frequent reporting must be required.
- f. Increased capacity of existing units due to new unit installation and natural gas leaks
- g. Manufacturer's data does not support limiting the units to 15 tons per year.
- h. Manufacturer's Guarantee and Warranty requirements
- i. Project should be considered a major modification.
- j. Best Available Control Technology review was flawed.

[Comment Nos. 169, H23, H34, P5, P6]

Response to Comment Thread 5:

a. *Has Iroquois included its compliance obligations under 40 CFR 60 Subpart OOOOb*

The commenters' December 2023 submittal to DEEP stated that the application made no reference to 40 CFR Part 60 Subpart OOOOb and therefore no action should be taken by DEEP regarding these permits. In response to a January 18, 2024, request from DEEP to evaluate Subpart OOOOb applicability and compliance, the Applicant identified and addressed these concerns. The permits specify that 40 CFR Part 60 Subpart OOOOb is applicable in Part IX of the permits. The Title V permit will be modified at a future date to incorporate all of the Subpart OOOOb requirements for the facility, with greater specificity in accordance with established practice.

b. *No need or benefit to Connecticut, just risk.*

Neither need nor benefit is required to issue a permit for a stationary source of air pollution in accordance with RCSA Section 22a-174-3a(d)(3) unless the project is a new "major stationary source" or "major modification" for a pollutant or precursor pollutant in an area designated as non-attainment for that pollutant or precursor pollutant. While the location of the project is designated as a severe ozone non-attainment area and the project will emit ozone precursors, the project (i.e., the installation of the two new turbines and modification of the existing turbine compressors) is not a new "major stationary source" or "major modification" as those terms are defined in RCSA Section 22a-174-1.

c. *Increased carbon emissions are inconsistent with Global Warming Solutions Act*

See Response to Comment Thread 1.

- d. *Increased air pollution in a severe ozone non-attainment area, less than 1900 feet from Brookfield's only middle school*

See Response to Comment Threads 1, 10, and 23.

- e. *Permits not Enforceable; Improved monitoring and more frequent reporting must be required.*

See Response to Comment Thread 4, Items d. and g.

- f. *There is no discussion in the application or draft permits of whether adding the two new proposed units would result in a modification of the existing turbines, by way of a change in the method of operation of those units that might increase low-load operations of those units and thereby increase their hourly and annual emissions. Additionally, there is no discussion of estimated natural gas leak rates for the pipelines being served by the proposed increased operating pressure generated by the new turbines.*

There will be no planned change in the method of operation or emissions for the existing units, except that they will now have oxidation catalyst to control CO emissions, CEMS for NOx emissions, acoustic baffles, and relocation of the stacks. The existing turbines are limited by the applicable permits to operate as they have historically, except for the reduced emissions of CO.

Natural gas leaks associated with the new units are regulated under 40 CFR Part 60 Subpart OOOOb. The new permits cite the applicability of 40 CFR Part 60 Subpart OOOOb and the applicable requirements of such will be incorporated into the facility's Title V Operating Permit.

- g. *Nothing in the permit application indicates that Iroquois submitted either CEMS data from similar units or stack testing preapproved by the Commissioner in writing and observed by department staff. Iroquois has submitted manufacturer's data, but these data do not establish that the proposed limits will limit annual emissions to less than 15 tpy.*

There are no requirements in the regulations to limit emissions to less than 15 tons. As allowed in RCSA Section 22a-174-3a(c)(1)(E)(vi), Iroquois provided manufacturer's data to estimate emissions in its application rather than CEMS or stack testing data. The vendor has guaranteed a NOx emissions concentration of 9 ppm, which will be verified with initial stack testing and CEMS.

- h. *Iroquois references a vendor guarantee of performance of 9 ppm, yet fails to provide a copy of the warranty (which I understand to be valid for three years). The specific terms of the warranty, including the length of coverage and other important details are not in the permitting record. Critically, the publicly available information concerning the vendor warranty specifically excludes operation at less than 50 percent of full load, startup, shutdown and transient operation, and operation below zero degrees F. There is nothing in the permitting record that I reviewed that defines transient operation. Most likely, failure to properly operate and maintain the unit will void the warranty and increase emissions by an unknown—and, per the proposed permit terms, unknowable— amount. For its part, Iroquois maintains that its need to use these turbines is demand driven. Based on this representation, it is reasonable to assume that Iroquois's operations of these turbines may include transient operations, operations at less than 50 percent load during periods of*

low demand, and operations at sub-zero temperatures on some cold winter nights. Accordingly, the publicly available manufacturer's representations of NOx performance are inconsistent with the Iroquois's attempt to use a 9-ppm NOx emission level to calculate emissions under all conditions of operation. Finally, it should be understood that, like the warranty on a new car, there is no guarantee that a component will not fail, just that, if it does, the seller will remedy the failure at its expense.

The regulations do not require Iroquois to submit a copy of the written guarantee from Solar, the turbine manufacturer. Notwithstanding the written guarantee from the manufacturer, the Department has determined that "Best Available Control Technology", as defined in RCSA Section 22a-174-1, for emissions of NOx shall be compliance with a 9 ppm NOx limit from 0°F – 100°F @ loads from 50-100%, which will be verified through an initial stack test and CEMS. BACT shall also include a prohibition on operating the new turbines below 50% load for any reason other than startups and shutdowns, an explicit requirement to shut the new units down if load is less than 50% for more than 10 minutes at a time, a requirement to have an audible alarm if load is below 50% for more than 10 minutes and an annual limit of 500 hours for the aggregate of startups, shutdowns, and sub-zero operations for all four turbines. These limits are expressed in the permits, and the permits include appropriate CEMS, record keeping and reporting to demonstrate compliance with these limits. The manufacturer's guarantee is not used as a means of demonstrating compliance with the limits of the permit.

- i. Project should be considered a major modification.*
- j. Best Available Control Technology review was flawed.*

Comment Thread 5, Items i and j address two related assertions, as follows:

1. The proposed limits in the applications are not practicably enforceable and therefore do not limit potential to emit from the proposed modifications of the existing turbines and the installation of the new turbines and emergency engine. Therefore, the increase in emissions triggers a major modification.
2. The applications contain a flawed BACT Analysis and BACT for the turbines should be, at best, an emission rate of 0 ppmvd @ 15% O2 NOx using electric motor driven compressors and at worst, 3.5 ppmvd @ 15% O2 NOx, using Advanced SoLoNOx and selective catalytic reduction.

1. Proposed project does not trigger a "major modification"

Permit applications propose the desired emissions limits sought by an Applicant. It is the permit that limits emissions. The draft permits here include limits on emissions of NOx and have been revised to require the installation and operation of CEMS to demonstrate compliance with the limits on NOx emissions.

See definitions of "potential to emit/potential emissions" at RCSA Section 22a-174-1(93), "practicably enforceable" at RCSA Section 22a-174-1(94), "major modification" at RCSA Section 22a-174-1(63), "maximum capacity" at RCSA Section 22a-174-1(69) and "stationary source" at RCSA Section 22a-174-1(113). A "major modification" is defined, in Connecticut, as a 25 ton per year increase in potential emissions of NOx at an existing major stationary source located in a severe non-attainment area. Since the permits, upon issuance, impose "practicably enforceable" limits that restrict the increase in "potential emissions" of NOx to less than 25 tons per year, the modification

of the existing turbines and installation of two new turbines and an emergency engine do not trigger a “major modification” as defined under RCSA Section 22a-174-1 and the requirements of RCSA Section 22a-174-3a(l) do not apply.

2. BACT determination for NOx

“Best Available Control Technology” or “BACT” is defined at RCSA Section 22a-174-1(16) and the determination of BACT is governed by RCSA Section 22a-174-3a(j). Both of those regulations (RCSA Section 22a-174-1 and RCSA Section 22a-174-3a) are federally approved and incorporated into the Connecticut’s State Implementation Plan. The regulations cited and the permits issued therefore are state and federally enforceable.

As required by RCSA Section 22a-174-3a(c), the Applicant submitted its applications using forms and instructions prescribed by the Commissioner. Therefore, as relevant here, the Applicant submitted its BACT analysis and proposal of BACT using forms and instructions prescribed by the Commissioner. The prescribed forms apply a “Top Down BACT” approach informed by EPA Guidance and the North East States for Coordinated Air Use Management (NESCAUM) BACT Guidance; neither of those guidance documents is explicitly promulgated as law. The Department’s prescribed forms specify that the “baseline emission rate” for evaluating emissions reductions and cost effectiveness is the “potential emissions of the proposed sources”. The instructions explicitly instruct the Applicant to specify the “Baseline Emissions Rate (BER)” by providing the estimated “Potential to Emit (PTE)” in tons per year for the pollutant of concern from the affected unit before implementation of the BACT option proposed.

The definition of “potential to emit/potential emissions” at RCSA Section 22a-174-1(93) relies on the “maximum capacity” of the equipment as limited by practicably enforceable operating limits. The “potential emissions” for pipeline quality natural gas fired turbines are limited by the “federally enforceable” and “practicably enforceable” limitations of the New Source Performance Standards for Gas turbines codified at 40 CFR 60.

At the time of the application submission and issuance of the tentative determination to issue permits, the applicable federal limitation on NOx emissions was 40 CFR 60, Subpart KKKK. Pursuant to 40 CFR 60 Subpart KKKK, natural gas turbines of the size and used for the purpose proposed by the Applicant were required to not exceed an emission rate of 25 ppmvd at 15% O₂ when operating at 75 percent of peak load or above it, and to not exceed an emission rate of 150 ppmvd when operating below 75% of peak load. The Applicant asserted that the base configuration of the brand and model of pipeline quality, natural gas fired turbine it seeks to use for its purposes, and that was also compliant with 40 CFR 60 Subpart KKKK across the full range of operation, is the Solar Turbines, Inc. Taurus 70 with conventional SoLoNOx designed and guaranteed to meet 25 ppm NOx @15% O₂ when operating at loads greater than 50% of peak load. The Applicant proposed as BACT, the Solar Turbines, Inc. Taurus 70 with Advanced SoLoNOx designed and guaranteed to comply with 40 CFR 60 Subpart KKKK across the full range of operation and meet 9 ppm NOx @15% O₂ at loads greater than 50% of peak load. The Applicant’s proposal accurately asserts that there are other configurations of the Taurus 70 with various add on NOx control systems that may achieve lower emissions and ranks their pollutant removal effectiveness accordingly. However, the Applicant discusses these and proposed that based on the incremental emissions reduction between these options, the higher incremental costs of these options, and the collateral environmental impacts, the Taurus 70 with advanced SoLoNOx designed and guaranteed to meet 9 ppm NOx @15% O₂ is BACT.

Immediately following the informational hearing on these permit applications, EPA promulgated 40 CFR 60 Subpart KKKKa. This new requirement supersedes the federally applicable and practicably enforceable limits of 40 CFR 60 Subpart KKKK for the proposed new turbines. The new limits are more stringent, requiring that the Applicant's new turbines not exceed an emission rate of 15 ppmvd @ 15% O₂ when operating at or above 70% of peak load and not exceed 150 ppmvd when operating below 70% of peak load.

The Applicant has not sought to amend its position on the base equipment configuration needed to assure compliance with 40 CFR 60, Subpart KKKKa and the associated baseline emission rate for purposes of the Top Down BACT review for NO_x. Applicable law does not explicitly require that the Applicant reassess its position on base equipment configuration and the Applicant's proposal of BACT complies with 40 CFR 60, Subpart KKKKa.

The Applicant followed the Top Down BACT methodology required in DEEP instruction and forms, which, as noted, are informed by EPA and NESCAUM Guidance. The Department reviewed the applicant's proposals, conducted appropriate independent research, and determined, in accordance with RCSA Section 22a-174-3a(j)(7) and RCSA Section 22a-174-3a(j)(8), that BACT for NO_x emissions from the Applicant's proposed new turbines is:

1. An emission limit of 9 ppmvd @15% O₂ when operating at or above 50% peak load,
2. A prohibition from operating in steady state below 50% peak load except during periods of startup and shutdown,
3. Limiting startups and shutdowns to 10 minutes per occurrence, and
4. Limiting the aggregate amount of time for startups, shutdowns across and subzero ambient temperature operations of all the turbines to 500 hours per year.

The Department's BACT determination for NO_x is more stringent than applicable federal regulations, more stringent than the Applicant's initial proposal, and avoids the collateral environmental impacts of marginally more effective add-on controls. These collateral environmental impacts include:

1. the disturbance of habitat needed to build sufficient infrastructure to support electric motor driven compressors,
2. the emissions of criteria pollutants, greenhouse gases and hazardous air pollutants from the bulk electrical grid to provide the power for electric motor driven compressors,
3. the consumption of potable water to inject reagents into a selective catalytic reduction system,
4. the criteria pollutant and HAP emissions associated with commercial vehicle traffic needed to transport reagents to the facility for use in a selective catalytic reduction system,
5. the potential for emissions of ammonia, a Connecticut regulated hazardous air pollutant, in the form of unreacted ammonia (i.e., ammonia "slip") from a selective catalytic reduction system, and
6. The potential increased particulate matter, PM_{2.5} and/or PM₁₀, emissions known to result from the chemical reaction of unreacted ammonia and other exhaust gas constituents forming ammonium salts downstream of the selective catalytic reduction system.

Comment Thread 6: Comments in Opposition from Save the Sound

Save the Sound submitted several comments in opposition to the project:

Comment 174 (09/16/26)

Comment H21 (01/15/26)

Comment O3 (01/08/26)

- a. Increasing emissions of NOx in an Ozone Nonattainment area will set Connecticut further behind in attaining the national ambient air quality standards.
- b. GHG emissions inconsistent with Global Warming Solutions Act.
- c. No benefit to Connecticut.
- d. Project is a major modification.
- e. Permit is unenforceable and requires additional monitoring.
- f. Draft permits do not apply Best Available Control Technology.
- g. DEEP must evaluate updated EPA New Source Performance Standards for gas turbines.

[Commenters 174, H21, O3]

Response to Comment Thread 6:

These comments are addressed throughout this response to comments document, specifically in the responses to Comment Threads 1 through 5.

Comment Thread 7: By recommending issuance of the permits, DEEP is not following its mission.

Several commenters stated that DEEP is not following its mission: *“The Connecticut Department of Energy and Environmental Protection (DEEP) is charged with conserving, improving and **protecting** the natural resources and the **environment of the state of Connecticut** as well as making cheaper, cleaner and more reliable energy available for the people and businesses **of the state.**”*; DEEP is mandated to comply with state regulations and to protect the environment; DEEP should prioritize keeping people safe over corporate profits; DEEP serves the public, not the corporations

[Commenters 8, 23, 33, 39, 40, 41, 47, 56, 57, 60, 73, 74, 75, 76, 77, 78, 87, 89, 99, 100, 101, 102, 103, 104, 105, 106, 107, 107a, 108, 109, 110, 111, 112, 113, 114, 117, 118, 119, 120, 121, 122, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 140, 141, 142, 144, 136, 137, 138, 140, 141, 142, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 165, 160, 176, 179, 182, 183, 185, 186, 187, 188, 209, 216, 219, 220, 221, H1, H2, H3, H11, H12, H19, H25, H32, H39, H41, H44, H46, H47, H50, H57, H58, H60, H62, H68, H69, H70, H72, H76, H77, H79, H89, H90, 91, H92, H93, H94, H95, H96, H97, H98, H99, H100, H101, H102, H103, H104, H105, H106, H107, H108, H109, H110, H111, H112, H113, H114, H115, H116, H117, H118, H119, H120, H121, H122, H123, H124, H125, H126, H127, H128, H129, H130, H131, H132, H133, H134, H135, H136, H137, H138, H139, H140, H141, H141a, H142, H143, H144, H145, H146, H147, H148, H149, H150, H150a, H152, H153, H154, H155, H156, H157, H158, H160, H161, H162, H163, H164, H165, H166, H167, H168, H169, H170, H171, H172, H173, H174, H175, H176, H177, H178, H179, H180, H181, H182, H183, H184, P4, O1, O5, O11, O15, O17, O18, O19, O20, O21, O25, O26, O28, O29, O33, O35, O37, O38, O41]

Response to Comment Thread 7

DEEP implements its policies and goals, including environmental protection, through regulation, enforcement and licensing procedures. The applications were submitted in accordance with applicable regulations and statutes. The project was reviewed, and permits were drafted to ensure that these sources would operate in compliance with applicable state and federal air regulations.

Comment Thread 8: DEEP should not have denied the request for an adjudicatory hearing.

Many commenters stated they are disappointed that DEEP denied the request for an adjudicatory hearing and are requesting one at this time. Commentors noted that hearings should be held in Brookfield; informational

hearing allows for no recourse if the permits are issued, where an adjudicatory hearing allows the final permits to be appealed; in the interests of transparency and fairness, an adjudicatory hearing is necessary; and DEEP's denial of an adjudicatory hearing by using PA 25-84 is contrary to the DEEP mission or the intent of the legislation.

[Commenters H18, H23, H39, H40, H41, H46, H47, H50, H51, H53, H54, H57, H58, H60, H63, H65, H66, H68, H69, H70, H71, H72, H77, H79, H80, H85, H86, H90, H92, H93, H94, H95, H96, H97, H98, H99, H100, H101, H102, H103, H104, H105, H106, H107, H108, H109, H110, H111, H112, H113, H114, H115, H116, H117, H118, H119, H120, H121, H122, H123, H124, H125, H126, H127, H128, H129, H130, H131, H132, H133, H134, H135, H136, H137, H138, H139, H140, H141, H141a, H142, H143, H144, H145, H146, H147, H148, H149, H150, H150a, H152, H153, H154, H155, H156, H157, H158, H160, H161, H162, H163, H164, H165, H166, H167, H168, H169, H170, H171, H172, H173, H174, H175, H176, H177, H178, H179, H180, H181, H182, H183, H184, O2, O3, O4, O6, O7, O10, O11, O12, O14, O15, O17, O18, O20, O21, O22, O23, O25, O26, O27, O30, O31, O32, O36, O37, O38, O39, O40, O42]

Response to Comment Thread 8:

Public Act 25-84 prescribes whether an adjudicatory or a public informational hearing is appropriate based on the specific petitions for hearing that the Department receives. For a determination that a contested case hearing is warranted and for petitioners to be conferred party status in such a proceeding, their petition must be submitted according to the specific procedures established in law and demonstrate that the petitioners have the requisite standing. If a petition demonstrates enough public interest but is not submitted according to the proper procedures or does not demonstrate that the petitioners have standing to raise their claims, Public Act 25-84 instead grants them the opportunity to be heard in a non-adversarial forum, the public informational hearing. Both types of hearing are intended to foster public input and can lead to meaningful changes in a draft permit before it is issued. Here, as a direct response to thoughtful public comments received during the course of this public informational hearing, the Department has added CEMS requirements to these permits.

Comment Thread 9: The Project contradicts the goals of the Global Warming Solutions Act.

Many commenters stated that this project contradicts Connecticut's mandated goals of reducing greenhouse gas emissions and transitioning away from fossil fuels; the project is not compatible with the binding Global Warming Solutions Act; DEEP senior management and leadership have made no effort to reconcile the permitting review with either legislative or executive policy regarding climate change goals or air quality, environmental, or health consequences. Greenhouse gas emissions are increasing rather than decreasing; climate change is going to be worse due to this plant; the increase of 80,000 metric tons of CO₂ doesn't reduce emissions.

[Commenters 1, 5, 7, 9, 12, 13, 14, 21, 22, 23, 24, 25, 27, 28, 30, 31, 32, 33, 34, 35, 36, 37, 39, 39a, 41, 42, 43, 44, 45, 47, 52, 55, 56, 57, 58, 59, 63, 64, 70, 72, 73, 74, 75, 76, 77, 78, 80, 81, 82, 83, 84, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 107a, 108, 109, 110, 111, 112, 113, 114, 117, 118, 119, 120, 121, 122, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 162, 165, 166, 169, 170, 171, 172, 174, 175, 176, 177, 178, 179, 180, 183, 184, 185, 186, 187, 188, 196, 198, 201, 202, 203, 204, 205, 208, 209, 210, 211, 214, 215, 216, 218, 219, 220, 221, 222, 223, 224, 225, 225, 226, 227, 228, 229, 230, H1, H2, H3, H6, H8, H10, H11, H12, H17, H18, GH19, H23, H24, H25, H29, H32, H37, H38, H39, H41, H42, H44, H45, H46, H47, H49, H50, H51, H53, H54, H55, H56, H57, H58, H60, H62, H63, H64, H67, H68, H69, H70, H71, H72, H75, H76, H77, H79, H81, H82, H83, H84, H85, H86, H90, H92, H93, H94, H95, H96, H97, H98, H99, H100, H101, H102, H103,

H104, H105, H106, H107, H108, H109, H110, H111, H112, H113, H114, H115, H116, H117, H118, H119, H120, H121, H122, H123, H124, H125, H126, H127, H128, H129, H130, H131, H132, H133, H134, H135, H136, H137, H138, H139, H140, H141, H141a, H142, H143, H144, H145, H146, H147, H148, H149, H150, H150a, H152, H153, H154, H155, H156, H157, H158, H160, H161, H162, H163, H164, H165, H166, H167, H168, H169, H170, H171, H172, H173, H174, H175, H176, H177, H178, H179, H180, H181, H182, H183, H184, O8, O9, O10, O13, O14, O17, O19, O22, O25, O26, O27, O29, O30, O31, O33, O36, O39, P8, P13, P14, P18]

Response to Comment Thread 9:

<https://portal.ct.gov/deep/climate-change/climate-change><https://portal.ct.gov/deep/climate-change/climate-change>

See Response to Comment Thread 1.

Comment Thread 10: Project is too close to Whisconier Middle School.

Many commenters stated that this project is too close to residents and vulnerable populations, including the Whisconier Middle School Students.

[Commenters 1, 4, 7, 8, 11, 12, 14, 15, 23, 30, 33, 39, 40, 43, 44, 46, 47, 50, 55, 59, 64, 65, 66, 67, 69, 70, 73, 74, 75, 76, 77, 78, 79, 81, 84, 85, 86, 87, 88, 90, 93, 94, 95, 96, 97, 99, 100, 101, 102, 103, 104, 105, 106, 107, 107a, 108, 109, 110, 111, 112, 113, 114, 117, 118, 119, 120, 121, 122, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 140, 141, 142, 144, 136, 137, 138, 140, 141, 142, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 165, 166, 167, 169, 170, 173, 174, 175, 176, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 196, 197, 200, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 214, 215, 216, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, H1, H4, H6, H8, H12, H13, H16, H23, H24, H25, H31, H32, H37, H39, H41, H42, H47, H53, H54, H57, H58, H59, H60, H68, H69, H70, H72, H80, H82, H83, H84, H85, H86, H87, H88, P1, O4, O5, O7, O8, O9, O17, O18, O20, O23, O26, O31, O34, O37, O39, O40, O41, P5, P7, P8, P9, P10, P11, P14, P15, P16, P17, P19]

Response to Comment Thread 10:

The applicable statutes and regulations do not provide minimum distance requirements for the review of air permits for the proposed activities. Pursuant to RCSA Section 22a-174-3a(d)(3), the Applicant is required to demonstrate to the Commissioner's satisfaction that the proposed new source or modification to an existing source can operate without preventing or interfering with attainment or maintenance of any applicable NAAQS in Connecticut or any neighboring jurisdiction. As detailed in the technical evaluation for the permits for the new turbines, the Applicant made the required demonstrations for operations of the modified and new turbines and ancillary equipment for all locations beyond the property boundary of the facility.

Additionally, RCSA Section 22a-174-3a(d)(3) required the Applicant to demonstrate compliance with the requirements of RCSA Section 22a-174-29 regarding the emissions of hazardous air pollutants from the turbines. Demonstration of compliance with RCSA Section 22a-174-29 required consideration of the distance from the stack exit of each turbine to the nearest property line of the facility. As detailed in the technical evaluations for the modified and new permits, the Applicant demonstrated compliance with emissions limits for hazardous air pollutants as required under RCSA Section 22a-174-3a(d)(3) and RCSA Section 22a-174-29.

Many commenters cite conclusions drawn in a Sierra Club study of risks associated with pipeline compressor stations. The conclusions in the study and the study methodology do not demonstrate that the Applicant will fail to satisfy any of the standards for granting a permit at RCSA Section 22a-174-3a(d)(3) or any other standard that DEEP must consider in reviewing this permit application.

[Comment Thread 11: Public was not afforded opportunity to actively participate in the permitting process.](#)

Several commenters stated that DEEP excluded the public from actively participating during the drafting of the permits; DEEP provided incomplete files failed to provide satisfactory access to files by not following the Connecticut's Freedom of Information Act; full response to the records requests by the public was not provided, consequently the tentative determination should be vacated; DEEP did not provide full access to the files prior to Tentative Determination; two letters that were submitted to the Department in May 2024 and May 2025 were not included or provided in the records; Tentative Determination should be vacated because files were not provided; FOIA took 4.5 months to complete

[Commenters 216, H25, H187, O23, O38]

[Response to Comment Thread 11:](#)

Constituents and elected officials were afforded the opportunity to review the application submissions, submit comments, and request hearings in accordance with applicable law. Further, the Department's permitting processes function independently of the Department's production of records under the Freedom of Information Act.

The Department makes all efforts to respond to FOIA requests as expeditiously as possible. The Department received over 1,500 FOIA requests last year alone. Responding to many of these requests involves producing thousands of documents, and some of the documents are thousands of pages long. The Department uses software in order to move such huge volumes of material in a timely manner. The Department further publishes many records online so that members of the public can peruse such records at their own convenience, for free, rather than waiting for the Department to search for them. DEEP's process is the same whether a requestor seeks one document or thousands.

[Comment Thread 12: DEEP did not consider proposed New Source Performance Standard for gas turbines.](#)

Several commenters stated that DEEP did not consider New Source Performance Standard 40 CFR Part 60 Subpart KKKKa in their review. In particular, several commenters questioned how DEEP could determine that BACT for NO_x is 9 ppm when EPA had proposed New Source Performance Standard 40 CFR Part 60 Subpart KKKKa for new combustions turbines that would have required a 3.75 ppm limit.

[Commenter H18, H21, H25, H187, O3, P6]

[Response to Comment Thread 12:](#)

Several commenters questioned how DEEP could determine that BACT for NO_x is 9 ppm when EPA had proposed New Source Performance Standard 40 CFR Part 60 Subpart KKKKa for new combustions turbines that would have required a 3.75 ppm limit.

At the time the Tentative Determination was issued, Subpart KKKKa was not finalized, and it was noted in the Technical Evaluation that the turbines would have to meet the final rule emission regardless of the limits in DEEPs Tentative Determination. However, on January 15, 2026, EPA published the final Subpart KKKKa rules in the Federal Register and the turbines that are being proposed by Iroquois will fall into the *New natural gas fired, Medium size (≥ 50 and ≤ 850 MMBtu/hr), with utilization $>45\%$ Subcategory* which has an emissions limitation, when operating at greater than 75% load, of 15 ppmvd @ 15% O₂. The new units will be well under the Subpart

KKKKa emission limitation as they will have a permitted emission limit, when operating at greater than 50 % load, of 9 ppmvd @15% O₂.

Comment Thread 13: Commenters' dispersion modeling suggests potential for short term episodic air pollution exposures

Comment O16 – Environmental Health Project: Comment states that their own pollution dispersion modeling has shown that the local topography results in unequal dispersion of pollutants ranging from 6 to 12 miles from the facility. Within this area of likely pollution dispersion are several recreational and community gathering spaces, including parks, trails, schools, childcare centers, businesses, and churches. The varied terrain in this area, as well as changing weather conditions and intermittent emissions from the facility, contribute to short-term episodic air pollution exposures, which can trigger acute and chronic health impacts. A map showing the modeled air pollutant dispersing can be found in our written comments. In addition to the level and duration of air pollution exposure, additional factors contribute to the health impacts experienced by individuals and communities.

[Commenter H35, O16]

Response to Comment Thread 13:

Pursuant to RCSA Section 22a-174-3a(d)(3), DEEP shall not issue a permit for a new or modified source of air pollution unless the Applicant demonstrates to the Commissioner's satisfaction that the proposed new source or modification to an existing source can operate without preventing or interfering with attainment or maintenance of any applicable NAAQS in Connecticut or any neighboring jurisdiction. The Applicant makes such a demonstration by submitting emissions modeling performed in accordance with 40 CFR 51, Appendix W; RCSA Section 22a-174-3a(i), and the Department's Ambient Air Impact Analysis Guidelines. 40 CFR 51, Appendix W and the Department's Ambient Impact Analysis Guidelines specify the Preferred/Recommended Models to be used for the new source review and prevention of significant deterioration programs. Per EPA's Air Quality Dispersion Modeling Website, the Preferred/Recommended Models are "required to be used for...NSR and PSD Programs" See: <https://www.epa.gov/scram/air-quality-dispersion-modeling>.

As detailed in the technical evaluation for the permits to install the new turbines, the Applicant demonstrated to the Commissioner's satisfaction that the new turbines, modified turbines, and ancillary equipment at the facility can operate without preventing or interfering with attainment or maintenance of any applicable NAAQS in Connecticut or any neighboring jurisdiction using state and federally mandated air dispersion models. These models address topography and meteorology. Consequently, the Applicant has made the demonstrations required under RCSA Section 22a-174-3a regarding the NAAQS.

The commenters' assertions of concern are based on use of the National Oceanic and Atmospheric Administration's (NOAA) Hybrid Single-Particle Lagrangian Integrated Trajectory (HYSPLIT) Dispersion Model. As NOAA's HYSPLIT Dispersion Model is not a Preferred/Recommended model for the NSR and PSD programs, as defined by EPA and the Department, the results submitted by the commenter do not meet federal and state approved modeling methodologies to refute the Applicant's demonstrations under RCSA Section 22a-174-3a(d)(3).

Comment Thread 14: Support for the proposed project

Several commenters submitted comments supporting the expansion at the Brookfield facility.

[Commenters H36, H78, H189]

Response to Comment Thread 14:

The comments have been reviewed and received by the Department.

Comment Thread 15: Trust fund to cover health costs from diseases linked to pollution exposure

Some commenters stated that anyone who gets sick from diseases linked to air pollution should be compensated; a trust fund should be created to pay for health costs.

[Commenters H41, H89, O15]

Response to Comment Thread 15:

This comment is outside of the scope of a permit application review.

Comment Thread 16: Enact Prohibition on future expansions of natural gas facilities

A commenter stated that DEEP should enact rulemaking that prohibits any further natural gas facilities, particularly avoiding proximity to schools and other vulnerable populations.

[Commenter H54]

Response to Comment Thread 16:

This project complies with all current applicable state and federal air regulations. Requests for additional rulemaking are outside of the scope of a permit application review.

Comment Thread 17: Iroquois omitted data in its health assessment.

Several commenters stated Iroquois' own health assessment omitted key data and long-term health impacts, particularly for children, who are more vulnerable to fossil-fuel emissions.

[Commenter H68, H69, H70, H72, H73]

Response to Comment Thread 17:

The Department's technical review confirms that Iroquois demonstrated that the project would comply with all applicable state and federal air regulations. Iroquois demonstrated that the project could comply with applicable ambient air quality standards, which are health-based standards promulgated by EPA. The air permit application process set forth at RCSA Section 22a-173-3a does not require any other health assessments.

Comment Thread 18: How is the Hearing Officer both a DEEP employee and impartial?

Two commenters questioned how the Hearing Officer can work at DEEP and be impartial.

[Commenter O23, O38]

Response to Comment Thread 18:

The framework whereby a government regulatory agency houses an administrative law court or similar entity to adjudicate its proceedings and decisions is standard practice across the country at both the federal and state level. This framework has been a foundational aspect of administrative law in the United States since the federal government's passage of the Administrative Procedure Act in 1946, which governs federal agencies. Connecticut followed suit by passing the Connecticut Uniform Administrative Procedure Act (UAPA) which is intended to

ensure accountability, transparency, and public participation in the actions of Connecticut agencies. One of the ways in which the UAPA achieves these goals is by empowering Connecticut regulatory agencies to hold hearings and specifically defines “hearing officer” to mean “an individual appointed by an agency to conduct a hearing in an agency proceeding. Such an individual may be a staff employee of the agency[.]” CT DEEP is further empowered to hold hearings by Section 22a-6 of the Connecticut General Statutes.

The Department’s Office of Adjudications is an independent adjudicatory body housed within DEEP. DEEP’s Office of Adjudications is siloed off from the Department’s various permitting and enforcement divisions, in order to preserve the hearing officers in that office for the unbiased execution of their duties as adjudicators. Further, DEEP’s permitting and enforcement divisions are subject to the same prohibition on ex parte communication as are all parties to any Department hearing. The Department applies these standards even for the new Public Act 25-84 Public Informational Hearings, even though hearing officers do not have a decision making role in such proceedings. This approach ensures that the Department’s permitting and enforcement divisions are on the same footing as members of the public and the regulated community when appearing before the Office of Adjudications.

[Comment Thread 19: Odors, Soot and Noise](#)

Several commenters stated that there is ongoing odor coming from the facility and soot covering their homes, along with vibrations felt from the existing plant. Project will emit hazardous noise; nothing has been done to correct these issues.

[Commenters 4, 10, 47, 70, H25, H33, H41, H89]

[Response to Comment Thread 19:](#)

Odor and soot (i.e., particulate dust) complaints should be directed to the Enforcement Section of the Bureau of Air Management. At this time, the Department is not aware of any ongoing odor and soot issues from the facility.

With respect to noise pollution, the Town of Brookfield is responsible for enforcing the applicable noise pollution control statutes found in Sections 22a-67 to 22a-76, inclusive, of the Connecticut General Statutes, and the town’s noise ordinance is in Chapter 159 of the Town Charter.

Vibration complaints are outside of the scope of the New Source Review Program.

[Comment Thread 20: Stack Testing Concerns and Continuous Emissions Monitoring](#)

Several commenters stated that the infrequent stack testing is insufficient; self-testing should not be allowed; Iroquois can test until they get a satisfactory result; what are the results of the previous stack testing for the existing units?; the permits requirement to self-report is not adequate since Iroquois has had past violations, monitoring and application analysis should be done by an independent/third party agency; permits are not enforceable and/or are not sufficient for continuous compliance because of insufficient monitoring without CEMS; why are continuous monitors not required; continuous emissions monitoring (CEM) should be required, not just on turbines but all emission points.

[Commenters 23, 33, 40, 45, 47, 87, 96, 169, 176, 179, 216, H8, H19, H21, H25, H39, H41, H44, H53, H57, H76, H89, H185, O2, O3, O5, O10, O14, O18, O21, O23, O29, O30, O39, P1, P6]

Response to Comment Thread 20

NO_x

As stated in Comment Threads 2, 4 and 5, the permits were revised to require the installation and operation of CEMS to measure and record emissions of NO_x from the 4 turbines. The CEMS must be installed, operated and maintained in accordance with 40 CFR 60 Subparts A, KKKK and KKKKa and RCSA Section 22a-174-4a. The CEMS must be installed and operated on all four turbines within 60 days of the new units achieving their maximum operating rate or 180 days of first operating the new units, whichever occurs first.

Iroquois will be required to conduct daily and quarterly quality assurance audits to ensure the accuracy of the data recorded. The data recorded by the CEMS will be submitted to the Department on a quarterly basis. The failure to operate and maintain the CEMS as required by the permits, the failure to submit the data recorded by the CEMS, and emissions greater than the allowable emissions in the permit will all be violations of the permits and subject to enforcement action.

The CEMS requirements in the revised permits satisfy applicable law and are consistent with the monitoring requirements applied to much larger sources, like power plants. The addition of the CEMS requirements strengthens and enhances the enforceability of the permits.

CO

Compliance with the CO emissions limits in the permits will be based on assuring compliance with the operating limits of the permits and periodic, stack emissions tests. Periodic, stack emissions testing for CO emissions is appropriate because:

- a. Brookfield is located in an area that meets the ambient air quality standards for CO,
- b. The emissions of CO from the turbines going forward are expected to be lower than current emissions at the facility, which have been monitored and enforced using stack emissions testing, and
- c. The allowable CO emissions from the proposed new turbines and modified turbines are well below the major source threshold for CO.

CO emissions testing must be performed every 5 years in accordance with the permits, the Department's Emissions Test Guidelines, and RCSA Section 22a-174-5, using appropriate EPA Reference Methods or promulgated and approved alternative methods. Iroquois must schedule the tests with the Department and provide the opportunity for the Department to witness and audit the testing. Iroquois must submit a report on the test process and results for Department review and approval. Failure to perform the tests, failure to perform the tests as required, and failure to submit the report are violations of the permits. Results that show emissions exceed the limits are violations of the permits. Violations of the permits are subject to enforcement action.

Other criteria air pollutants

Emissions of the remaining criteria air pollutants from the turbines are expected to be very low relative to allowable NO_x and CO, and compliance with the limits for these emissions is expected to be met by adhering to the fuel limitations and operational limits in the permits. This approach is consistent with similar sources at gas pipeline compressors located throughout Connecticut. However, the Department can compel Iroquois to perform emissions testing to demonstrate compliance with the permit limits at any time pursuant to RCSA Section 22a-174-4a.

Iroquois is a Title V Source, as that term is defined in RCSA Section 22a-174-33, and operates under a Title V Operating Permit, issued in accordance with RCSA Section 22a-174-33. RCSA Section 22a-174-33 is a federally approved 40 CFR Part 70 program as shown in 40 CFR Part 70 Appendix A. Thus, Title V Operating Permits issued under RCSA Section 22a-174-33 are state and federally enforceable. Following issuance of the permits for the new and modified turbines, the terms and conditions thereof would be added to Iroquois' Title V Operating Permit. Any violation of an emissions limit in the permits, discovered via CEMS or emissions testing, would be subject to the prompt deviation reporting requirements of the permit and RCSA Section 22a-174-33(p). Furthermore, Iroquois would be required to report the violation in its annual compliance certification as required under Title V Operating Permit and RCSA Section 22a-174-33(q)(2).

Several commenters expressed apprehension with a compliance framework that seems to rely upon self-reporting. It is important to note that emissions testing and the operation of CEMS are subject to Department oversight and potential onsite review and evaluation by Department staff. Additionally, while self-reporting is one mechanism used by regulators, like DEEP and EPA, to ensure compliance with permit and regulatory requirements, there are other complementary approaches used to evaluate the veracity of self-reported information. As a Title V Source, Iroquois' facility is subject to periodic full facility inspections performed by Department staff. These inspections include an actual site visit and comprehensive review of the equipment, monitoring systems and records that Iroquois is required to maintain to demonstrate compliance with the Title V Operating Permit and the underlying permits for the new and modified turbines.

Several commenters inquired as to whether past emissions tests for the existing turbines were considered in the review of the applications to install new units and modify the existing units to emit less CO. In its review and establishment of baseline NOx emissions from the facility, the Department reviewed the results of biennial NOx tests performed on the existing units from 2014 to 2024. Biennial testing is required by the current permits and 40 CFR 60 Subpart KKKK and the results of recent tests are shown below:

Year	Unit 1 (Permit #028-0027) test results (ppm)	Unit 1 Permit Limit	Unit 2 (Permit #028-0028) test results(ppm)	Unit 2 Permit Limit
2014	11.4	15	5.8	15
2016	13.4	15	4.3	15
2018	12.9	15	3.7	15
2020	14	15	6	15
2022	6.3	15	4.7	15
2024	5.7	15	4.8	15

These emissions test results demonstrate compliance with the limits applicable to the existing units, and the requirement for CEMS monitoring for NOx emissions from both the existing and new units will ensure compliance with NOx emissions limits of the proposed new permits.

Regarding Commenter No. H185's request for an independent third-party review of the applications and monitoring, DEEP reviews all air permit applications in its role as an impartial regulator. The applicable regulations do not require third-party review as part of the permitting process. DEEP's authority to issue and enforce air permits is established under Connecticut law and EPA-approved State Implementation Plan (SIP) regulations. Accordingly, this request is outside the scope of the New Source Review program.

Comment Thread 21: Opposition to Fracked Gas

Several commenters stated they were in opposition to fracked gas going through the pipeline.

[Commenters 14, 45, 68, 84, 85, 86, 88, 90, 94, 95, 97, 165, 182, 184, 189, 196, 203, 204, 205, 208, 210, 211, 215, 218, 230, H24, H51, H62, P7, P8, P9, P10, P11, P12, P15, P16, P17, P19]

Response to Comment Thread 21:

The issue of whether fracked gas is more damaging to the environment in general is outside of the scope of the regulatory standards for granting a permit at RCSA Section 22a-174-3a.

Regardless of the source of natural gas, the emissions of air pollutants from the proposed equipment are limited by the permits, and any exceedance of the emission limit in the permit constitutes an enforceable violation. Iroquois will be subject to initial and recurrent emissions testing requirements, which would either demonstrate compliance with the limits of the permits or demonstrate a violation of the permit. If Iroquois violates the limits of the permits, then it would be subject to enforcement action, including potential penalties.

The monitoring and testing of emissions from the units is carefully outlined in the proposed permits. These requirements will be incorporated into the facility's Title V Operating Permit. The facility will be subject to periodic monitoring, record keeping, and reporting of compliance with these requirements in accordance with the new and modified turbine permits, 40 CFR 70, RCSA Section 22a-174-33, and the Title V Operating permit for the facility.

Comment Thread 22: Natural gas will be sent to New York with no benefit to Connecticut

Many commenters stated that the gas is going to be used in New York and is of no benefit/no demonstrated need to Connecticut; the project is really for the exporting of LNG; New York doesn't need the gas;

[Commenters 3, 5, 7, 8, 9, 10, 12, 16, 18, 20, 21, 25, 33, 35, 36, 40, 43, 49, 59, 60, 65, 73, 74, 75, 76, 77, 78, 87, 161, 162, 166, 169, 170, 172, 174, 179, 181, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 198, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, H1, H18, H19, H24, H27, H37, H38, H39, H40, H43, H46, H48, H49, H50, H51, H52, H53, H54, H61, H68, H69, H70, H71, H72, H75, H76, H80, H83, H84, O1, O7, O8, O9, O11, O12, O13, O19, O26, O28, O29, O32, O35, O40]

Response to Comment Thread 22:

See Response to Comment Thread 5, Item b.

Comment Thread 23: Concerns with National Ambient Air Quality Standards (NAAQS)

Several commenters stated that Brookfield is located in a severe non-attainment area for ozone and already fails to meet the NAAQS for ground level ozone; approving this plant proves Connecticut's disregard of NAAQS compliance; EPA has found DEEP's plans for attaining air quality to national standards inadequate; Connecticut has failed to bring ozone into attainment; the project violates the intent of the Clean Air Act; permits are an example of the state's disregard for its legal obligation to meet the NAAQS; air quality is already poor; Brookfield doesn't need any more air pollution; how can DEEP allow more NOx and VOC emissions in a severe non-attainment area; minor source segmented permitting in a severe non-attainment area continues to circumvent the intent of achieving attainment; the levels of pollution that the permits limit to are not protective of health; area is subject to inversions that have been witnessed with a FLIR camera/unique topography because site sits in a bowl.

Comment P1: NO2 and PM10/2.5 were above their Significant Impact Levels ("SILs") and therefore cumulative modeling was required for these pollutants. Cumulative modeling was not completed for PM10 because there

are no major background emissions sources within the significant impact area; how do they comply with PM2.5 NAAQS? Air data was taken from Albany, NY, surely closer and more representative data should have been used.

[Commenters 7, 23, 28, 35, 39, 40, 47, 49, 50, 54, 73, 74, 75, 76, 77, 78, 83, 87, 99, 100, 101, 102, 103, 104, 105, 106, 107, 107a, 108, 109, 110, 111, 112, 113, 114, 117, 118, 119, 120, 121, 122, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 140, 141, 142, 144, 136, 137, 138, 140, 141, 142, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 162, 163, 164, 166 160, 169, 170, 174, 175, 176, 179, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 197, 201, 202, 206, 207, 209, 214, 216, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, H1, H2, H3, H5, H9, H10, H12, H18, H24, H25, H29, H39, H41, H47, H49, H50, H51, H53, H54, H57, H58, H60, H63, H65, H66, H68, H69, H70, H72, H76, H77, H79, H87, H89, H90, H92, H93, H94, H95, H96, H97, H98, H99, H100, H101, H102, H103, H104, H105, H106, H107, H108, H109, H110, H111, H112, H113, H114, H115, H116, H117, H118, H119, H120, H121, H122, H123, H124, H125, H126, H127, H128, H129, H130, H131, H132, H133, H134, H135, H136, H137, H138, H139, H140, H141, H141a, H142, H143, H144, H145, H146, H147, H148, H149, H150, H150a, H152, H153, H154, H155, H156, H157, H158, H160, H161, H162, H163, H164, H165, H166, H167, H168, H169, H170, H171, H172, H173, H174, H175, H176, H177, H178, H179, H180, H181, H182, H183, H184, H187, P1, P2, O5, O8, O9, O10, O11, O12, O16, O18, O21, O22, O26, O28, O29, O32]

Response to Comment Thread 23:

With respect to Connecticut not meeting the ground level ozone NAAQS and EPA's finding that Connecticut's plans for meeting the standard are inadequate: On November 13, 2023, Connecticut [finalized amendments](#) to its regulations in response to EPA's November 7, 2022 [final rule](#) designating three counties in Connecticut as "severe" non-attainment for the 2008 National Ambient Air Quality Standards (NAAQS or standards) for ozone. This designation was a result of failure to attain the NAAQS by the attainment date of July 20, 2021. Connecticut remains committed to attaining the ozone NAAQs and will continue advance regulatory programs, policies and strategies to improve air quality. This requires a multifaceted approach including regulatory strategies to address local emission sources as well as advocating for federal measures to address air pollution transport as well as enacting measures to address mobile sources. These are regulatory tools within the purview of the federal government and critical components to an overall attainment strategy. Connecticut will continue to advocate for these strategies to improve air quality, and to attain the ozone NAAQs. Connecticut continues to meet its regulatory requirements under the Clean Air Act for NAAQS compliance for ground level ozone. Further, Connecticut's proposed attainment demonstration shows that Fairfield County may plausibly attain the 2008 Ozone NAAQs. See [Revise SIP Air Quality Attainment 2008 Ozone NAAQS and Motor Vehicle Emissions Budgets](#)

As stated in the Response to Comment Thread 1, above, ambient Ozone concentrations have been declining over the past 40 years due to Connecticut's strong action to [reduce ozone precursor pollution from stationary, area and mobile sources](#). There is no regulatory or statutory prohibition on issuing air permits for sources that emit Ozone precursors in a designated Ozone non-attainment area, solely based on its attainment designation.

Pursuant to RCSA Section 22a-174-3a(d)(3), DEEP shall not issue a permit for a new or modified source of air pollution unless the Applicant demonstrates to the Commissioner's satisfaction that the proposed new source or modification to an existing source can operate without preventing or interfering with attainment or maintenance of any applicable NAAQS in Connecticut or neighboring jurisdictions. The Applicant makes such a demonstration by submitting emissions modeling performed in accordance with 40 CFR 51, Appendix W, RCSA Section 22a-174-3a(i), and the Department's Ambient Air Quality Analysis Guidelines. The applicable modeling regulations and guidance contain methodologies for estimating the impacts of Ozone precursor emissions, specifically Nitrogen Oxides and Volatile Organic Compounds on background ozone values. As detailed in the technical evaluation and modeling analyses for the new turbines and using the criteria set forth in the applicable

modeling regulations and guidance, the Applicant has demonstrated that it can operate the facility without preventing or interfering with attainment or maintenance of the Ozone NAAQS.

With respect to Comment P1 concerning NO₂ and PM_{10/2.5} being above their SILs and therefore cumulative modeling was required for these pollutants:

Since the impacts from the proposed turbines were above SILs out to 2km (which is referred to as the Radius of Significance), cumulative modeling was required for NO₂ and PM_{10/2.5}. A search of the BAM point source inventory was conducted and there were no other major or minor off-site background sources within the Radius of Significance except the previously permitted turbines and generator at the Iroquois facility in Brookfield (CTDEEP AIAG 2019). Therefore, cumulative modeling was done including the four turbines and two generators on site. The combined predicted impacts were below the NO₂, PM₁₀ and PM_{2.5} NAAQS.

Compliance with the PM_{2.5} NAAQS was demonstrated by adding the predicted 24-hour and annual impacts from all Iroquois sources to the 24-hour and annual PM_{2.5} 3-year background design values, which are 23.0 mg/m³ and 7.63 mg/m³, respectively. Since these model-predicted impacts are less than 35 mg/m³ and 9 mg/m³, respectively, compliance with the applicable 24-hour and annual PM_{2.5} NAAQS has been demonstrated (CTDEEP AIAG 2019).

With respect to Comment P1 concerning *Air data that was taken from Albany, NY, surely closer and more representative data should have been used:*

The National Weather Service does not collect upper air data at Connecticut airports (CTDEEP AIAG 2019). The Iroquois facility in Brookfield is approximately 30 miles inland from Long Island Sound. Albany Airport is the closest, most representative inland airport that collects upper air data. Therefore, DEEP used Upper Air Meteorology Data from the Albany Airport coupled with surface meteorology data from the Danbury Airport. Such is allowable in accordance with 40 CFR 51 Appendix W and the Department's Ambient Impact Analysis Guidelines, which governs air dispersion modeling for air permitting analyses.

Comment Thread 24: Health Effects, Safety, Ambient Monitoring

Several commenters stated that DEEP should conduct a cumulative effects and health assessment/monitoring including noise, vibration and explosion/safety risk; DEEP should look at the entire facility with regard to health impact; additionally, there should be a requirement to have ambient air quality monitoring in Brookfield before the permits are issued (requested by the town and not acted upon by DEEP; why hasn't mobile testing unit been used) and continuously once they are issued; improved monitoring, reporting, and enforcement is needed; more needs to be done to reduce emissions at this facility;

[Commenters 7, 14, 39, 44, 49, 51, 70, 72, 73, 74, 75, 76, 77, 78, 84, 85, 86, 87, 88, 90, 94, 95, 96, 97, 99, 100, 101, 102, 103, 104, 105, 106, 107, 107a, 108, 109, 110, 111, 112, 113, 114, 117, 118, 119, 120, 121, 122, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 140, 141, 142, 144, 136, 137, 138, 140, 141, 142, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 166, 165, 174, 179, 182, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 198, 203, 204, 205, 208, 210, 211, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, H23, H25, H26, H32, H39, H41, H54, H61, H68, H69, H70, H76, H77, H79, H80, H86, H87, H88, H89, P1, P2, P3, P7, P8, P9, P10, P11, P15, P16, P17, P19, O1, O10, O18, O21, O33, O38, O39, O40]

Response to Comment Thread 24:

There is no regulatory or statutory requirement for Iroquois to perform ambient air quality monitoring to obtain the proposed new permits and permit modifications. However, the Department administers a sensor loan program that enables communities to obtain PurpleAir sensors and use them to explore changes in local air quality. For more information on community-based monitoring and the sensor loan program, please see: <https://portal.ct.gov/deep/air/monitoring/community-monitoring>.

While the effects from noise, vibration, odor, and other safety issues are legitimate concerns, the air permit process does not involve these considerations. The air permit process is designed to ensure the emissions of criteria pollutants and hazardous air pollutants are controlled in such a manner as to protect ambient air quality standards. The Town of Brookfield has jurisdiction over noise and vibration. The Department will investigate and enforce odor regulations. To lodge a complaint regarding odors, impacted parties should contact the Bureau of Air Management's complaint line at 860-424-3436 or via email at deep.aircomplaints@ct.gov.

Comment Thread 25: Build Renewable Energy Infrastructure rather than fossil fuel infrastructure.

Several commenters stated that renewable energy infrastructure (wind, solar, battery) should be built rather than fossil fuel; fossil fuel infrastructure will be a stranded asset and unneeded in the future because renewables are less expensive to build and operate; this will delay the installation of renewable energy sources. Building more gas infrastructure will increase electricity prices.

[Commenters 21, 24, 31, 37, 39a, 42, 162, 223, 224, 225, H6, H10, H12, H19, H26, H27, H30, H32, H62, H75, H77, H80, O19, O24, O25, O28, O30, O36, P7, P8, P9, P10, P11, P12, P13, P14, P15, P16, P17, P18, P19]

Response to Comment Thread 25:

See Response to Comment Thread 1 with respect to compatibility with Connecticut's statutory GHG reduction goals and Comment Thread 5m item b with respect to need for new gas infrastructure. The other concerns addressed in these comments are outside the scope of an air permit review conducted in accordance with RCSA Section 22a-174-3a.

Comment 26: DEEP's BACT review is flawed and electric motor drive turbines should be BACT

Several commenters stated that DEEP is not correctly implementing or following state and federal law with respect to BACT; the permits should have lower emissions, or no emissions as required by federal and state law (i.e., use of SCR or EMD) because cost was used to dismiss these technologies; DEEP did not do a critical review of EMD BACT, which is demonstrated between Eversource sales manager and Iroquois consultant. BACT was therefore fatally flawed, potentially resulting in a successful challenge of the permits. BACT decision is fundamentally flawed; at a minimum, Iroquois should be required to use EMD compressors regardless of cost; permit limits for NOx are essentially RACT not BACT as required; Energy Management Technology (EMT) should be BACT; did DEEP evaluate medical costs of treating asthma or cancer?; how was the cost calculated to exempt EMD?; BACT requires Best Available, not Cheapest Available.

Cost basis was done incorrectly because DEEP used 24.9 tons as the potential and not 76 tons. Units were evaluated at one third of rated capacity.

[Commenters 23, 33, 39, 40, 43, 46, 47, 48, 49, 51, 53, 54, 56, 58, 59, 81, 87, 89, 96, 162, 165, 176, 177, 183, 213, 216, H1, H4, H5, H8, H18, H19, H21, H23, H24, H25, H26, H29, H31, H32, H39, H41, H44, H46, H47, H51, H53,

H54, H57, H58, H59, H65, H67, H68, H69, H70, H74, H76, H79, H80, H85, H86, H89, H90, H187, O1, O2, O8, O9, O11, O23, O26, O42, P6]

Comment 26 Response:

See Responses to Comment Thread 4 and Comment Thread 5

Comment Thread 27: Increased Methane leaks will occur along the length of the gas pipeline

Several commenters stated that there will be increased methane leaks due to the greater volume and pressure of natural gas, including methane from blowdowns as blowdown frequency is increasing; emissions from leaks are under reported.

[Commenters 32, 33, 35, 39, 43, 65, 70, 73, 74, 75, 76, 77, 78, 82, 83, 98, 171, 174, 176, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 214, 216, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, H6, H9, H18, H41, H45, H49, H53, H54, H60, H61, H64, H76, H77, H81, H85, H89, H90, H92, H93, H94, H95, H96, H97, H98, H99, H100, H101, H102, H103, H104, H105, H106, H107, H108, H109, H110, H111, H112, H113, H114, H115, H116, H117, H118, H119, H120, H121, H122, H123, H124, H125, H126, H127, H128, H129, H130, H131, H132, H133, H134, H135, H136, H137, H138, H139, H140, H141, H141a, H142, H143, H144, H145, H146, H147, H148, H149, H150, H150a, H152, H153, H154, H155, H156, H157, H158, H160, H161, H162, H163, H164, H165, H166, H167, H168, H169, H170, H171, H172, H173, H174, H175, H176, H177, H178, H179, H180, H181, H182, H183, H184, P4, O9, O10, O11, O17, O24, O25, O35, O37, O39]

Response to Comment Thread 27:

The Applicant is not required under RCSA Section 22a-174-3a(d)(3) to make demonstrations regarding the emissions leaks along the pipeline at locations outside the boundary of the facility to obtain an air permit at the facility. The installation of new turbines at the facility triggers the applicability of 40 CFR 60, Subpart OOOOb. The requirements directly applicable to the turbines are referenced in the proposed permits for the new turbines. 40 CFR 60, Subpart OOOOb also imposes requirements to minimize methane emissions across the facility with enhanced leak detection and repair requirements and other work practices. The requirements applicable to the turbines and the rest of the facility will be explicitly incorporated in the facility's Title V Operating Permit and prior to commencement of operation of the new turbines. These requirements will be state and federally enforceable. Further, the facility will be subject to periodic monitoring, record keeping, and reporting of compliance with these requirements in accordance with 40 CFR 60, Subpart OOOOb and 40 CFR 70, RCSA Section 22a-174-33, and the Title V Operating permit for the facility.

Additionally, the facility is subject to annual greenhouse gas reporting requirements under 40 CFR 98. These federally enforceable requirements designate how to appropriately report for subject facilities.

Finally, the Federal Energy Regulatory Commission and the United States Department of Transportation have primary jurisdiction for the safety and security of materials moving along interstate pipelines. Applicants for air permits are not required to demonstrate compliance with these requirements to obtain an air permit in accordance with RCSA Section 22a-174-3a. However, the issuance of an air permit in accordance with RCSA Section 22a-174-3a is independent of and does not supersede or subvert a permittee's requirement to comply with applicable FERC and DOT requirements. Any FERC and/or DOT preconstruction and operating requirements must be met or the agency with appropriate jurisdiction may take appropriate action to enforce compliance with the requirements.

Comment Thread 28: Aging Pipeline Concerns

Several commenters stated that the pipeline is an aging pipeline and was built without regard for public safety; susceptible to accidents; pipeline is need of repairs, and the extra strain will make the pipeline more vulnerable to accidents.

[Commenters 23, 30, 33, 39, 45, 47, 56, 73, 74, 75, 76, 77, 78, 87, 96, 99, 100, 101, 102, 103, 104, 105, 106, 107, 107a, 108, 109, 110, 111, 112, 113, 114, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 140, 141, 142, 144, 136, 137, 138, 140, 141, 142, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 163, 160, 174, 176, 185, 186, 187, 188, 188, 189, 190, 191, 192, 193, 194, 195, 209, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, H1, H8, H19, H24, H29, H37, H39, H40, H44, H47, H51, H52, H53, H58, H60, H65, H68, H69, H70, H72, H76, H77, H79, H86, H89, H90, H92, H93, H94, H95, H96, H97, H98, H99, H100, H101, H102, H103, H104, H105, H106, H107, H108, H109, H110, H111, H112, H113, H114, H115, H116, H117, H118, H119, H120, H121, H122, H123, H124, H125, H126, H127, H128, H129, H130, H131, H132, H133, H134, H135, H136, H137, H138, H139, H140, H141, H141a, H142, H143, H144, H145, H146, H147, H148, H149, H150, H150a, H152, H153, H154, H155, H156, H157, H158, H160, H161, H162, H163, H164, H165, H166, H167, H168, H169, H170, H171, H172, H173, H174, H175, H176, H177, H178, H179, H180, H181, H182, H183, H184, O9, O14, O17, O19, O28, O31, O37, O40, P18]

Response to Comment Thread 28:

See Response to Comment Thread 27.

Comment Thread 29: Lack of confidence in Connecticut’s response to violations at compressor stations.

Several commenters stated that facility has had past environmental compliance violations, primarily a \$22 million Clean Water Act fine in the 1990s, that means they should not be trusted with public safety; Iroquois has an open violation at their Milford facility; violations at Milford and Cromwell prove that emissions violations occur and enforcement is not timely and there are no consequences; Cromwell took over 10 years to resolve and Milford has been going on for 5 years with no end in sight.

[Commenters 4, 23, 39, 45, 47, 87, 174, 176, 179, 216, 217, H8, H23, H25, H37, H39, H47, H51, H52, H76, H90, H187]

Response to Comment Thread 29:

The Department disagrees with the commenter’s portrayals of the enforcement actions referenced, and of the Department’s SIP enforcement program at large. The Department’s Air Bureau utilizes a multifaceted strategy to ensure broad and lasting compliance with state and delegated federal regulatory programs, including SIP programs. The primary elements of the Air Bureau’s enforcement strategy include (i) proactive compliance assistance and outreach; (ii) compliance monitoring, inspections, and investigations; and (iii) enforcement response to noncompliance. Within this framework, DEEP engages in a number of enforcement activities with the objective of fairly and robustly ensuring compliance with air quality laws in Connecticut, including the issuance of violation notices, administrative orders with penalty, and civil litigation referrals. The Air Bureau’s enforcement program is subject to routine federal audit, in which the Department has consistently received high marks.

The Department wishes to provide additional context with respect to NOV no. 18197 – issued to Iroquois on September 15, 2021, for a permit violation at its Milford compressor station – which the commenter incorrectly describes as “being unresolved 4 years after the violation.” By way of background, the NOV involved the operation of the turbine under NSR permit no. 105-0103 at less than 50 percent of the maximum rated load

between 2:55 am and 8:36 am on August 20, 2021, due to an operational error. The violation was resolved the same day, August 20, 2021. Software updates and additional operator training were implemented in September 2021 to prevent this issue from reoccurring. The issuance of the NOV was consistent with the Department's statutory enforcement authority. EPA's policy on "timely and appropriate enforcement" ([Revision of US EPA's ERP for High Priority Violations of the CAA: Timely and Appropriate Enforcement Response to High Priority Violations - 2014](#)), as cited by the commenter, does not apply here as the violation at issue is not a federal high-priority violation, as defined in such policy. Nevertheless, the Department's issuance of the enforcement action as well as the resolution of the violation cited therein were both prompt.

The Department also wishes to provide additional context with respect to Consent Order no. 8383, issued to Algonquin on December 9, 2024, to establish enforceable VOC RACT requirements at its Cromwell compressor station. The commenter correctly observes that this consent orders establish "forward looking compliance measures," as is indeed the goal of any RACT order. However, contrary to the commenter's assertion that this consent order "doesn't show retroactive penalties or deterrent sanctions proportional to nearly 10 years of noncompliance," the Department notes that the respondent paid a \$193,460.40 civil penalty in a separate consent order addressing the same violation (Consent Order no. 2525, issued on August 27, 2021). The consent order and underlying NOV were processed timely and appropriately and in full consistency with the aforementioned federal HPV policy. The background of the RACT order is as follows:

Using a highly conservative potential to emit (PTE) methodology, with an assumed natural gas VOC content more than an order of magnitude higher than the actual average VOC content, Algonquin and the Department determined on December 5, 2019, that the Cromwell compressor station triggered VOC RACT as of calendar year 2014. Again, this determination was made on the basis of potential, not actual, emissions. Theoretically, Algonquin would have been eligible to operate under an emission cap until 2016, in which year actual emissions, including emissions from otherwise-excludable combustion sources, tripped the applicable major source threshold. An exceedance of an applicability threshold, either on a potential or actual emission basis, does not necessarily indicate an exceedance of any specific emission limit or a level of emission control such as RACT. Contemporaneously with tripping this applicability threshold, Algonquin replaced older, higher-emitting internal combustion engine-driven reciprocating compressors (operation of which was duly authorized by Department permit in accordance with state and federal performance standards) with newer, lower-emitting turbine-driven centrifugal compressors with dry seals. Also, contemporaneously with triggering RACT, Algonquin implemented technologies and monitoring that met or exceeded a RACT level of control; see TSD and response-to-comment document for the RACT action for further. Consequently, as is the ultimate goal of the RACT program, VOC emissions that cannot be excluded pursuant to RCRA Section 22a-174-32(b)(3) decreased substantially, as did combustion VOC emissions. For additional context, at the time that RACT was triggered, RACT would not have required Algonquin to replace the engine-driven reciprocating compressors with turbine-driven centrifugal compressors. This type of technology would not have been required as Best System of Emission Reduction (BSER) for methane (a much more abundant pollutant in pipeline-grade natural gas than VOC) for new, modified, and reconstructed sources under the 2016 NSPS. The decision to install turbine-driven centrifugal compressors was one made independently by Algonquin.

Nothing in the administrative record for Consent Order no. 8383 suggests that the CAA violation (failure to submit a RACT plan and implement RACT) from which the consent order stemmed involved ongoing excess emissions. The commenter writes that "DEEP allowed a facility in an ozone nonattainment area to exceed RACT requirements for nearly a decade before securing enforceable controls"; however, this assertion is inaccurate, because the Department did not allow Algonquin to violate its regulations. and is further contradicted by the aforementioned facts, which do not demonstrate an actual RACT exceedance. Algonquin failed to timely submit a RACT plan or implement an enforceable RACT mechanism; this does not imply that its emissions exceeded a

RACT level of control. Consent Order no. 8383 largely memorialized and made enforceable, as a SIP measure, RACT-level technologies and monitoring regimes. With respect to the commenter's assertion that "[u]nder CAA §113(d) and SIP enforcement provisions, penalties are supposed to recover the economic benefit of noncompliance and deter future violations," the Department notes that the civil penalty assessed in Consent Order no. 8383 recovered an economic benefit predicated on the free-market value of VOC emission reduction credits corresponding to the potential (but not actual) RACT applicability threshold exceedance, not withstanding the inapplicability of 42 U.S. Code Section 7413(e) to the Department's enforcement proceeding in this instance.

Comment Thread 30: Environmental Justice

Several commenters asked why Brookfield was not included in the list of towns affected by Public Act 23-202 (An Act Concerning Environmental Justice of the Department of Energy and Environmental Protection).

[Commenters 178, 180, H12]

Response to Comment Thread 30:

Section 22a-20a of the Connecticut General Statutes, which was amended by Public Act 23-202, applies to environmental justice communities, which the statute defines as either:

- a [distressed municipality](#), as designated by the Connecticut Department of Economic and Community Development (DECD); or
- a U.S. census block group where 30% of the population is living below 200% of the federal poverty level.

Public Act 23-202 amended other sections of that statute but did not amend that definition.

The DECD does not list the town of Brookfield as a distressed municipality and does not contain any U.S. census block groups that meet the statutory definition of Environmental Justice Community. Therefore, this statute does not apply to Iroquois' applications for new and modified air permits.

Comment Thread 31: Iroquois is circumventing major source permitting

Several commenters stated that DEEP is allowing Iroquois to circumvent major source permitting by using a minor source modification segmented permitting with emissions just below major source (i.e., 24.9 tons/year), unlawfully allowing to be a minor modification rather than a major modification; how are these units a minor source?; the site is a major source and the permits circumvent requirements with minor source permits; the proposed project is really a new major source and it is illegal to permit in this manner; baseline was calculated incorrectly (i.e. 38.6 tpy cap), courts have stated the method DEEP used is unlawful therefore lowest achievable emissions rate (LAER) would apply; there is not adequate monitoring to show compliance with the project being a minor modification;

[Commenters 169, 179, 216, H12, H16, H21, H23, H25, H39, H54, H60, H67, H68, H69, H70, H72, H75, H76, H89, H187, P1, P2, O3, O8, O9, O11, O12, O21, O23, O36, O38, O42, P6]

Response to Comment Thread 31:

See Responses to Comment Thread 4 and Comment Thread 5. The technical evaluation clearly identified the process for determining that the project is not a major modification and describes the regulatory requirements to permit these units as minor sources and still be a minor modification with respect to the premises.

Comment Thread 32: DEEP is not following CEPA

Several commenters stated that DEEP is not following the Connecticut Environmental Policy Act (CEPA).

[Commenter 179, 216, H12, H25, H187]

Response to Comment Thread 32:

A Connecticut Environmental Policy Act (CEPA) evaluation is not required for air permits issued to private companies. That requirement of CEPA specifically applies to discretionary actions proposed, funded, or undertaken by state agencies and establishes a process for state agencies to review and assess potential environmental impacts. CEPA falls outside of the scope of the New Source Review program for this project.

[Overview of Connecticut Environmental Policy Act.](#)

Comment Thread 33: FERC Environmental Impact Statement should be updated

Several commenters stated that the FERC Environmental Impact Statement was issued in 2021 before Fairfield County was designated as severe non-attainment for ozone in 2022 and therefore no longer valid; market conditions have changed since 2021 and a supplement EIS should be completed; Brookfield's water supply is not "public" as stated in FERCs Impact Statement.

[Commenters 216, H18, H25, H54, P1, P2, H187, O15]

Response to Comment Thread 33:

FERC is an independent federal agency; DEEP does not have the authority or jurisdiction over FERC matters and cannot require an update to their Environmental Impact Statement. Regardless, the Environmental Impact Statement issued by FERC is non-binding with respect to the New Source Review Program and therefore not considered in DEEP's decision making on the proposed permits.

Comment Thread 34: DEEP should include safety mitigation requirements

Several commenters stated that DEEP should include on-site and off mitigation requirements (safety/blast barriers, additional security); permits should contain adequate fencing, onsite-personnel, and other mitigation to protect them from catastrophic events; several commenters stated that there is no evacuation plan for the community, especially the school, in case of an accident at the facility. Unmanned site is unacceptable.

[Commenter 4, 10, 216, H53, H54, H68, H69, H70, H72, O7, O20, O27, O29, O31, O35]

Response to Comment Thread 34:

On-site and off-site mitigation requirements, along with other comments on general safety concerns because of the potential for accidents at the plant are outside of the New Source Review air permitting program and therefore not considered in DEEP's review.

Comment Thread 35: Property Devaluation

A commenter stated that the project will devalue the properties nearby.

Response to Comment Thread 35:

Property values near the facility are outside of the scope of the New Source Review air permitting program and therefore not considered in DEEP's review.

Comment Thread 36: Applicant Comments

The Applicant (M. Kinik) submitted comments on the project and responses to comments received during the Public Informational hearing: Comment H91: Michael Kinik (01/26)

Response to Comment Thread 36:

The Applicant's comments pertain to the permitting timeline and responses to many of the oral comments that were presented during the informational hearing, and the Applicant's submittal is part of the public record. The Department is not providing specific responses to the Applicant's comments and is only responding to comments received by the public in this response document.

II. Substantive Changes and New Notice of Tentative Determination

Two substantive changes have been made to the draft permits since the Public Informational Hearing on January 8, 2026.

1) The Department received many public comments that observed that 24.9 tons is the highest pollutant cap that can be permitted through the minor New Source Review process; were the Applicant seeking a cap of 25 tons, they would have had to apply for major modification permits instead. The Department recognizes that enforcement of the 24.9 ton emission limit is a priority because of its proximity to the regulatory threshold between these separate permitting processes. Breaching this cap would not only violate the terms of the permits but would also demonstrate that the activity should be regulated by a different type of permit altogether. For this reason, and following the requests of numerous public commenters, the Department informed the Applicant that additional requirements must be written into the permits to ensure that the Applicant's operations would not lead to the exceedance of this cap. In the time following the Informational Public Hearing, the Department worked with the Applicant to add language to draft permits to ensure the enforceability of the limit. These discussions resulted in the revised permits including CEMS provisions. As many of the public comments recognized, CEMS's real-time monitoring of the emissions from the turbines in question will provide the Applicant and the Department with the information required to document any exceedance of the 24.9 ton limit because the Applicant is required to report emissions to the Department. Upon receipt of a report of such an exceedance, DEEP has the authority to enforce the provisions of the permits or even reassess whether minor New Source Review permits are appropriate for Iroquois' activities at this facility. The Department's inclusion of CEMS provisions in these draft permits is a direct response to the thoughtful public comments it received during the Public Informational Hearing. This inclusion makes the draft permits more stringent, more enforceable, and more protective of Connecticut's people and environment.

2) During that process of incorporating CEMS in the draft permits, the Applicant realized that the limits for CO in its initial applications for these permits and permit modifications were lower than what the Applicant believes it will need to provide enough fuel at the terminus of the pipeline. Therefore, the Applicant requested an increase in the limits for CO emissions. The increase that the Applicant requested is permissible under the law. However, the request for the modification to increase these limits was made well after the Department had already issued a notice of tentative determination and after any opportunity for the public to consider and comment on the new set of numbers. To ensure that public input is included in this permitting process, the Department required that the Applicant formally request modification of the draft permits and will publish a new notice of tentative determination to approve the permits with this modification. The Department will accept comments regarding all aspects of the revised permits, not just the modifications made to the CO limits. This new notice, once published in a newspaper of general circulation, starts a thirty-day public comment period.

The Department has posted a Notice of Tentative Determination to issue revised draft permits for the proposed new turbines compressors and modified turbine compressors proposed by Iroquois. This recommendation is based on Iroquois' demonstration, as required pursuant to RCSA Section 22a-174-3a(d)(3), that it will:

- (A) *Construct and operate such stationary source or modification in accordance with the permit, and operate such stationary source or modification in accordance with all applicable and relevant emission limitations, statutes, regulations, schedules for stack tests, and other order of the commissioner. In the event a conflict exists between the permit and another state or federally enforceable statute, regulation or order of the commissioner, the most stringent provision shall apply;*

The final permits specify emissions limitations, continuous emissions monitoring requirements, stack testing requirements and the authority of the Commissioner to revise these conditions, if necessary. The draft permits also require the Applicant to construct and operate the facility in accordance with all applicable requirements. The Applicant has certified the permit applications. The Applicant has demonstrated to the satisfaction of the Department, as required by applicable law, that it will construct and operate the facility in accordance with all relevant emissions limitations, stack test requirements and any other requirement of the commissioner.

- (B) *Operate such stationary source or modification without preventing or interfering with the attainment or maintenance of any applicable ambient air quality standards or any Prevention of Significant Deterioration increments under subsection (k) of this section;*

The Applicant has submitted an ambient air quality analysis as required under RCSA Section 22a-174-3a(k). The Department has determined that compliance with the draft permits will not cause or contribute to the significant violation of any applicable ambient air quality standard or PSD increments.

- (C) *Operate such stationary source or modification without preventing or interfering with the attainment or maintenance of any National Ambient Air Quality Standard in any other state and without interfering with the application of the requirements in any other state's implementation plan, adopted pursuant to section 110 of the Act;*

The Applicant's ambient impact analysis, which was reviewed by the Department, has demonstrated that compliance with terms and conditions of the draft permits will not significantly impact air quality or interfere with the attainment of any NAAQS or the SIP for any other state.

- (D) *Operate such stationary source or modification in accordance with all applicable emission standards and standards of performance pursuant to 40 CFR Parts 60, 61, and 63, as may be amended from time to time;*

The proposed sources for this project will be subject to a New Source Performance Standards (NSPS) 40 CFR Part 60 Subpart KKKKa. The draft permits reference the relevant requirements to ensure that the applicable standards are complied with. The facility's Title V permit, once modified, will incorporate all of the relevant Subpart KKKKa requirements for these new units. The BACT review has reduced the allowable Subpart KKKKa NO_x emissions for these sources from 15 ppmvd to 9 ppmvd @15% O₂.

The new turbines are also subject to New Source Performance Standards Part 60 Subparts OOOOb. Subpart OOOOb applicable requirements will be incorporated into the facility's Title V Permit in a separate permitting transaction. All applicable requirements will be added to the Title V permit when applicable.

- (E) *Install:*

(i) sampling ports of a size, number and location as the commissioner may reasonably require, (ii) instrumentation to monitor and record emission and other parameter data as the commissioner may require, and (iii) such other sampling and testing facilities as the commissioner may require;

The draft permits included requirements to conduct stack testing, and to make and keep records to show continual compliance with the permits, where applicable. Compliance with these requirements will result in the installation of sampling ports, monitoring instrumentation and stack testing as the commissioner requires. After careful review of the public comments, DEEP is now requiring continuous emissions monitoring for NOx emissions on all four combustion turbines.

- (F) As the commissioner may require, conduct stack tests at the expense of such owner or operator, in accordance with subsection (e) of this section, and in accordance with permit conditions and methods prescribed by the commissioner. Such stack tests shall demonstrate, to the commissioner's satisfaction, that the requirements of each and every applicable permit or order of the commissioner for such stationary source or modification are being met and that such stationary source or modification complies with the Regulations of Connecticut State Agencies and federal requirements;*

The draft permits set forth the requirements for initial/recurring stack emissions testing and specifies that the commissioner retains the right to revise these requirements to demonstrate compliance.

- (G) Pay all fees required by the Department within forty-five (45) days of receipt of a tentative determination of the commissioner;*

The Applicant has paid all the application fees and the remaining permit fees must be paid before final permit issuance.

- (H) Incorporate Best Available Control Technology (BACT), as directed by the commissioner, for greenhouse gases and each air pollutant listed in Table 3a(k)-(1) of subsection (k) of this section subject to, and in accordance with, subsection (j) of this section;*

The Applicant submitted BACT determinations for NOx and CO as the potential emissions from each of these pollutants exceeds 15 ton/year. The Department has concluded that BACT for NOx and CO is the use of Advanced SoLoNOx and oxidation catalyst. Draft permits have incorporated emissions limits, operating limits, work practices and/or pollution control equipment that meet the requirements of BACT and CO, where applicable.

- (I) Incorporate the lowest achievable emission rate (LAER), as directed by the commissioner, for each air pollutant subject to, and in accordance with, subsection (l) of this section;*

These sources are not subject to non-attainment and LAER review.

- (J) Incorporate the maximum available control technology (MACT), as directed by the commissioner, for each air pollutant subject to, and in accordance with, subsection (m) of this section;*

The proposed sources and the premises are not a major source of federal hazardous air pollutants (HAP) and therefore will not be subject to RCSA Section 22a-174-3a(d)(3)(J).

- (K) *As required by the commissioner, install monitoring equipment and perform monitoring to demonstrate compliance with any permit provision. Such monitoring may include, but not be limited to, continuous emission monitoring (CEM);*

The draft permits require the Applicant to install monitoring equipment and CEMS for NO_x emissions to ensure compliance with permit conditions. The proposed permits require the installation of appropriate monitoring equipment. Failure to install and operate the equipment in accordance with the permits would result in a violation of law and be subject to enforcement action and considerable monetary penalties.

- (L) *Provide the commissioner with current information regarding air pollutant emissions from such stationary source or modification, and in accordance with the commissioner's request, submit updated and current information regarding air pollutant emissions from any other stationary sources located on the applicable premises;*

The Applicant has provided detailed information on the expected emissions from these sources. The draft permits contain monitoring, record keeping and stack testing requirements to show compliance with the emissions limits contained in the permit.

- (M) *Comply with any applicable maximum allowable stack concentration or other emission limitation of section 22a-174-29 of the Regulations of Connecticut State Agencies, as may be amended;*

The draft permits require that each emission of HAP not exceed any applicable MASC, and that the Applicant comply with RCSA Section 22a-174-29 at all times. The draft permits contain record keeping requirements to show compliance with the applicable MASC.

- (N) *Demonstrate that the emission limitation required of such stationary source or modification for the control of any air pollutant shall not be affected by that portion of the stack height of such stationary source or modification that exceeds good engineering practice stack height or by any other dispersion technique;*

The minimum allowable stack heights specified in all of the permits are equal to or below GEP stack heights. Therefore, the emissions limits required of each stationary source are not affected by any portion of the stack height of such stationary source that actually exceeds good engineering practice stack height or by any other dispersion technique.

- (O) *Comply with an approved operation and maintenance plan submitted pursuant to subsection (c)(2) of this section;*

The commissioner's determination of appropriate operation and maintenance requirements for these sources are specified in the draft permit rather than in an optional, separate plan submitted pursuant to RCSA Section 22a-174-3a(c)(2). The Applicant must comply with these permit requirements or it will be subject to enforcement action for violating the permit and RCSA Section 22a-174-3a.

- (P) *Have completed and submitted, on forms prescribed by the commissioner, a pre inspection questionnaire, if requested to do so by the commissioner, which describes the equipment, processes and materials used;*

A pre-inspection questionnaire has not been requested of the Applicant. The NSR applications and additional requested information provide all of the information required to issue the Tentative Determination and draft permits.

(Q) *Make the permit available at the subject premises throughout the period that such permit is in effect; and*

The draft permits require that the Applicant keep copies of the final permits on the premises at all times and be available for inspection during regular working hours.

(R) *Comply with the applicable provisions of this section and any other applicable regulations, permits or orders of the commissioner for such stationary source or modification.*

The draft permits do not relieve the Permittee of the responsibility to conduct, maintain and operate the regulated activity in compliance with all applicable requirements of any federal, municipal or other state agency. Nothing in the permits shall relieve the Applicant of other obligations under applicable federal, state and local law.

All permit and prior public notice fees were paid by the applicant on August 15, 2025.

/s/ James Grillo
James Grillo, APCE

7/24/2026
Date

Review

/s/ Louis J. Corsino III
Louis J. Corsino III, SAPCE

7/24/2026
Date

/s/ Jaimeson Sinclair
Jaimeson Sinclair, Director

7/24/2026
Date

Appendix A

List of Commenters

Written Comments:

Comments themselves may be viewed and downloaded here: [In Re Iroquois Comments](#). This link will only work for the recipients of this email. To share the contents, please download the files within, save them to your computer, and share those saved copies.

1. Written Comments received prior to Tentative Determination (P1 – P6)
2. Tentative Determination Comments (1-189)
3. Written Comments received through January 6, 2026 (H1 - H15)
4. Written Hearing Comments received through January 15, 2026 (H16 – H189)

Appendix B

January 8, 2026 Iroquois Gas Transmission Hearing Transcript

Notes:

- All speakers are identified at the start of their comments by the following nomenclature Commenter O1 – O42.

O1

Selectman Stephen Dunn

00:34:13

Yeah, I thank you for the opportunity to comment. The Connecticut Department of Energy and Environmental Protection is a cornerstone of the state's efforts to balance environmental regulation and environmental stewardship under one administrative umbrella.

- Deep plays a critical role in ensuring that Connecticut meets the demands of the present without compromising the needs of future generations.
- Recognizing that growing interdependence between environmental policy and energy production, the Connecticut General Assembly passed legislation in 2011 to create the Department of Energy and Environmental Protection.
- This reorganization formally began operations on July 1st, 2011. The consolidation reflected a modern understanding that environmental quality and energy management must be addressed jointly to achieve sustainability.
- DEEP's mission encompasses three main areas. Environmental protection, energy regulation, and natural resource conservation. We're going to talk about, really, two today. Environmental protection.
- DEEP enforces state and federal environmental laws to protect air and water quality, manage waste, and preserve ecosystems. It also

oversees programs to reduce pollution, restore contaminated sites, and maintain biodiversity.

- Its energy policies deep regulates energy generation, distribution, and use in the state. It promotes renewable energy development, energy efficiency, and reduced greenhouse gas emissions.
- The Department's Bureau of Energy and Technology Policy developed strategies to increase the use of clean and affordable energy sources, ensuring energy security while mitigating the impacts of climate change.
- These efforts sustain both the environment and the state's
- economy. Through partnerships with municipalities, advocacy groups, and private entities, DEEP continues to lead regional and national initiatives that address climate change, promote environmental education, and expand renewable energy structure.
- And here, this is from your website. The Connecticut Department of Energy and Environmental Protection represents a forward-thinking model of governance, reflecting the state's commitment to a sustainable future. By combining environmental and energy policy under roof... one roof.
- deep ensures that Connecticut remains a leader in protecting its natural heritage while advancing clean, reliable, and equitable energy systems.
- You say, that we want to... how can DEEP not protect our residents by requiring these straightforward and reasonable requests of our town and its residents? Asking for, electric compressors, ambient air testing.
- Not one ounce of the gas that flows through these pipes benefits residents in Connecticut.
- So why wouldn't we, instead of getting 9 parts per million, get 0 parts per million, rather than 25 tons of particulate matter? We ask that DEEP reconsider that, and do what's right for the town and for the state of Connecticut. Thank you.

O2:

Daniel Myers

00:37:40

My name's Dan Myers. I'm a Brookfield resident, a core author of the Stop the Brookfield Compressor Station Expansion Petition, a parent, and an engineer.

- I want to focus on a core technical defect in the backed analysis, one that has not been meaningfully addressed in the draft permit. The proposed turbines have a potential NOX emissions rate of roughly 76 tons per year, yet the draft permit limits total station emissions in a way that effectively restricts the new equipment to 24.9 tons per year.
- In practical terms, this technology only complies because it is limited to roughly one-third of its usable capacity. That restriction's not incidental, it's a synthetic control.
- And this is where the backed analysis fails. The applicant's cost analysis treats that permit limit as if it were free.
- But constraining the compressors to a fraction of their designed throughput is a control cost. The permit restrictions represent hundreds of millions of dollars per year by limiting total transport

of gas by the new compressors and in impairing firm service guarantees by the shipper. This

- is the cost of the control. And when that cost is properly attributed to the emissions reductions achieved, the claimed backed cost of roughly \$2,300 per ton becomes meaningless. The emissions reductions are being achieved through constrained operation, not through inherently clean technology.
- A valid-backed analysis cannot compare technologies while assigning a zero cost to a binding operational restrictant acting as a control.
- If the permit itself is the control strategy, its economic impact must be included. And once that's done, alternatives such as electric motor drives, which achieve low emissions without crippling throughput, cannot be dismissed so casually.
- I also want to note that DEEP is relying on this paper limit without requiring continuous emissions monitoring in a long-standing non-attainment area with documented deficient enforcement practices.
- This permit, as drafted, is unenforceable under the Clean Air Act. Finally, I want to address process.
- Commissioner Dykes has the discretion to convene an adjudicatory hearing. And given the volume of public engagement, the hundreds of comments, and the tens of thousands of residents represented by their elected officials objecting, declining to provide that forum is unreasonable.
- Further, 3 separate petitioners followed the instructions on CT Deep's own website, only to have their petitions denied procedurally. This was Deep's mistake, not the petitioner's. This is dishonest and unethical, Officer Reiser.
- DEEP must make it right. The back determination is incomplete, the permit is unsound, the public was misled by DEEP, and the only reasonable remedy is an adjudicatory hearing.

03

Jessica Roberts

00:40:37

Thank you. Good evening. My name is Jessica Roberts. I'm a staff attorney with Save the Sound, a regional nonprofit organization dedicated to protecting and preserving Connecticut's air, land, and water.

- We petitioned for an adjudicatory hearing in this matter to participate as a party in the administrative proceedings, and to preserve the right to judicial review of the final permits.
- While we maintain that an adjudicatory hearing is required here.
- We do want to emphasize that we appreciate this opportunity to voice some of our concerns. And given the 3-minute time limitation, my testimony tonight is just going to focus on one of our concerns, and that's that DEEP has unlawfully failed to treat this project as a major modification.
- So, as Deep explained, a major modification is a modification to the compressor station that would result in a net emissions increase of NOx equal or greater than 25 tons of NOx nitrogen oxide emissions per year.
- In this case, DEEP determined that the net emissions increase will be 24.9 tons of NOx per year.

- Which is obviously 0.1 ton less than the threshold. And this determination was in error.
- For some very brief backgrounds, the net emissions increase should be calculated by subtracting the baseline emissions from the potential of the project to emit.
- Here, Deep inserted an emissions cap of 38.6 tons per year of NOx into the permits, and then relied on this cap to determine the project's potential to emit.
- But courts have held that this is not lawful.
- A permit condition that merely limits the amount of actual emissions cannot be used to determine the potential to emit.
- If DEEP does not rely on this emissions cap, then the project would clearly qualify as a major modification, and DEEP would have to require the lowest achievable emissions rate, rather than backed
- In addition to other requirements.
- So for this reason alone, the permit violates the law.
- And Save the Sound urges DEEP to determine that the project is a major modification.
- And revise the permits accordingly.
- And I also want to flag, while I have the time, that any NOx limitation has to comply with EPA's new source performance standards.
- Per a consent agreement, the EPA must finalize these by tomorrow, January 9th, and these new source performance standards may well affect the NOx limitations here.
- We urge DEEP to take these new source performance standards into account, and we will also be submitting written comments that detail our concerns further. Thank you.

O4

Senator Stephen Harding

00:43:54

Yes, thank you for holding this this evening. I'm fortunate to represent Brookfield in the State Senate, and I'm also fortunate to live in Brookfield nearly my entire life.

- and live nearly miles away from where this compressor station is being expanded. I can tell you that as a senator representing neighbors in Brookfield, but also as an individual that is going to be impacted by this in my neighborhood, this is critically important to be provided an opportunity for all of my constituents, all of my neighbors, to be providing full input on this, and in a judic court
- judicatory process. I think as Mr. Meyer said, as well as the attorney for Save the Sound, they're exactly right, and the commissioner does have the authority to allow for that process. I think from the public input here, we have over 100 people on this Zoom call tonight.
- I could venture to say that in nearly no circumstances is that occurring in most of these processes with these projects. Just by pure volume, if you represent the people of this state in deep, give them a full process to adjudicate this fully.
- These are health risks, unrisk for our kids, for our families, these are environmental risks for everyone in our community. This is being

put up literally yards away from a school, a middle school, which my children are going to be attending.

- This needs a full, transparent process where every single one of my constituents, every single one of my neighbors have an ability to object to this. This should not be approved in any circumstance.
- I know, deep.
- works hard for the people of this state on environmental-related issues, on health issues. I'm asking you, in this one particular instance, on behalf of my constituents, on behalf of my neighbors, show that transparency here. Show that you care here. Give us that opportunity of an adjudicatory process to fully flesh this out on behalf of my constituents. I thank you for listening to my concerns tonight, and hope that you follow up on this process. Thank you.

O5

Selectman Karl Hinger

00:46:23

Good evening. My name is Carl Hinger, and I'm a selectman in Brookfield. I'm here to express my concerns, and the concerns of many Brookfield residents regarding this permit.

- I want to ask a simple but critical question raised by the draft permit. How will Deep actually know whether this expanded compressor station is harming the people who live and learn nearby?
- This facility sits just 1,900 feet from the Wisconeer Middle School, which serves nearly 800 students in grades 6 through 8.
- Hundreds more residents live within a mile of the compressor station, yet despite being well within Deep's authority, this draft permit includes no requirement for ambient air quality monitoring in the surrounding community, including near the school.
- This is especially concerning, given that Brookfield is already located in a severe ozone non-attainment area.
- In this context, approving additional emissions without close and continuous monitoring is not consistent with the department's responsibility to protect public health and the environment.
- If DEEP does not measure what residents are breathing at ground level, then potential impacts will remain invisible, even if they are very real.
- Second, the monitoring conditions included in this permit are inadequate to ensure compliance or deter violations.
- Stack testing under ideal conditions and heavy reliance on operator self-reporting do not reflect the real operating profile of a compressor station, where emissions can fluctuate during startups, shutdowns, malfunctions, and blowdowns.
- Without continuous monitoring or independent verification, exceedance may never be detected, and it is our children who will bear that risk.
- DEEP has both the authority and the obligation to protect the air quality and health of Connecticut residents. Given the location of this facility, next to homes, next to our middle school.

- That obligation is even greater. If this expansion is to move forward, it must begin with ensuring that the air breathed by Brookfield children for 7 hours a day, 5 days a week, over multiple years of their development is safe.
- That requires consistent site-specific ambient air monitoring. Thank you for your time.

O6

Selectman Bob Belden

00:49:06

So, thank you for the opportunity to speak tonight.

- My comments this evening are directed at the deep leadership and deep staff.
- We, one of the things... just as background, I've been in public office now for close to 25 years, elected 6 times in Brookfield. I'm currently one of the selectmen.
- And one of the lessons I've learned over 25 years is that as a public advocate, I listen to the people who talk to us.

00:49:51

No worries, no worries. I've been on lots of Zoom meetings over my life. The,

- You listen to the public, you respond to the public, you take... when you hear lots of the same concerns, you take it very seriously, and you actually assure the public that we're on top of this and we're working on it.
- the, in Brookfield, We had 2 years where every single
- Board of Selectmen meeting we had, we had multiple speakers concerned about this project.
- As a result, the Board of Selectmen wrote a very serious and well-thought-out letter with our concerns too deep. We wrote to the governor, we wrote to our elected officials.
- And I was warned about this. It has been like a brick wall.
- Right? There has been no response, no acknowledgement, no engagements, no public hearings before a preliminary permit was issued. And as I sit here in tonight's meeting, it's very clear there's been lots of engagement with the applicant.
- So, the balance between, listening to your constituents and listening to your applicant is Notably unbalanced.
- And we've had no meaningful response to our letters, to written comments.
- to our request for an adjudicatory hearing, and it doesn't matter which of the organizations has done it, but for sure, the Board of Selectmen has tried multiple times to communicate, and we take it seriously. I simply ask
- that you listen really carefully tonight. These are heartfelt concerns. We've had members of the public and parents who have come to us almost in tears, concerned about their children's health.
- at the school that's just around the corner. And and it's not things that... it's things that we can do things about.

- Right? And we had made proposals on that, and if you members of the DEEP do not have the, the written letter from the Board of Selectmen, please read it. Thank you.

O7

Shannon Riley - BDTC Chair

00:52:56

Thank you. Good evening. I'm speaking tonight as, the chair of the Brookfield Democratic Town Committee, as well as a parent and mother of four children.

- Two of my children have already attended school at Wiskoneer Middle School. One is graduated, and one will be graduating this year. And then I will have two children that are going to be, in that building
- In the future. My concern is for the children that are in that building, as well as the staff and faculty.
- you know, the children come in there for 3 years and then move on, but the staff and faculty there are there for the long haul. They are the people that are, and the people in the neighborhood are the ones that are going to be seeing the long-term effects of this increase.
- There's... as far as I can see and can tell, there's very little benefit to Brookfield.
- for this expansion. This is, you know, a compressor that is coming into Connecticut to go from New York to go right back to New York, just because, for whatever reason, it was...
- Deemed, you know, okay to come into our,
- Our town to move this gas line.
- I'm worried about the potential, you know, domino effect, that if the compressor is, upgraded, that then it will, you know, there's the other pipeline that comes through here too, what they might decide that they want to increase as well.
- The fact that it's an unmanned compressor station, you know, is,
- very concerning to me, what happens in the... the effect that some... in...
- That something tragic does happen, and there's no one on site to immediately shut down, or to monitor, or to even see, you know, the potential of a risk happening there.
- I really do encourage, Deep to, participate in the adjudicory, hearing. It was very disheartening that,
- Through all of the letters and petitions that were signed that are... that everything was rejected.
- It seemed to be, again, as Mr. Belden stated, kind of one-sided, where engagement is with Iroquois, and not so much with the town of Brookfield, the Save the Sound, and the, 1900 feet.
- So...
- Thank you very much for my time tonight. I will be sending a, you know, more explicit letter, but I do appreciate having the time to speak this evening.

O8

Gabby Meredith

00:56:24

My name is Gabrielle Meredith, and I'm a concerned student of Connecticut. There is no doubt many of you in this room and in the Zoom grew up with climate change as a distant problem, something, you know, put off for company profit, and because it won't happen anytime soon.

- And it seemed to brush off then, but it's 2025 now.
- And as a 14-year-old, to be honest, my most reoccurring thought is, do I even have a future?
- Take your time recalling your thoughts at that age, because right now is a luxury.
- Today, we are 4 years away from the Global Reduced Emissions Goal of 2030, made to combat the worst of climate change and not pass any more tipping points than scientists say we already have. Despite this, we're not even close to the goal.
- This project is yet another step back into the comfort we're familiar with, back into fossil fuel profits, when an electrical option was available.
- even under the stand... even if it's under the standards, it is still pollution, as is... as it's been said in other comments. And it's already...
- A zone where we cannot afford any more pollution.
- And
- the only real benefit is to the pockets of these... of the companies in New York and the companies of the Iroquois, and probably the companies of cardiovascular medication,
- CEOs, because that is how much it may affect the health of this community that it is being placed in.
- As it has been said, it's 1900 feet away from a middle school.
- I'm sorry, I didn't prepare for this. Okay.
- The severe non-attainment, it's, as I've said.
- It's... it's already, a major risk...
- We already have major wrist compressions, and it's not... and it's not a minor, addition, because Sorry.
- But... I'm... sorry, I'm nervous, but...

00:58:54

Citizens know that if, the project goes through, it is so likely, it's very likely, that, as I said before, more projects will turn up.

- And knowing that there are cleaner options, like EMD, I urge you to consider not only the children's future of Brookfield, but children everywhere affected by climate change, and not just your companies. Thank you.

09

Valdi Weiderpass

00:59:37

Thank you, and thank you to the previous, student who had the courage and kept going, even though she had trouble. I'm having trouble right now because I'm in tears.

- The big picture here, I'm a retired engineer.

- So I know a little bit about compressors and pipelines and the chance for leaks.
- What was mentioned by the engineer representing the company in the beginning was that they won't exceed permitted pressure maximum levels.
- Fine, but you are boosting the pressure on a 33-year-old pipeline, which risks the safety.
- Of anybody along this pipeline.
- Not just people in Brookfield.
- Not just people at that school, but yeah, especially at the people at the school.
- Every joint, every valve, every pressure gauge, every compressor station has multiple points for leaks and multiple points of possible failure. When you increase the pressure, that increases the chance of failure.
- And has anybody really reviewed the, the integrity of all of the welds in this existing pipeline that's 33 years old?
- You're increasing emissions. That's the other major thing. So what? It's less than originally proposed in terms of the amount of the increase.
- And as the student said.
- Climate change is the thing we're supposed to be worried about, and that's what the Department of Energy and Environmental Protection should have as its major goal.
- It's not even clear that this... the demand is going to go up, because the All Electric Buildings Act of New York is going to be implemented. New York City is going to have an All Electric Buildings Act already coming into force.
- And people are moving away from fossil fuel heat.
- including natural gas to, both air source heat pumps and geothermal heat pumps, and adding efficiency, better insulation, better weather stripping, so...
- Likely, the gas demand is gonna go down.
- So, I don't think this is really justified, and the United States is already exporting liquefied natural gas.
- So we're adding to the world's problems.
- the... just, the total of the climate-driven disasters is now 23 for the year 2025. That's billion-dollar disasters. There's one occurring every 16 days.
- And this was a total of 20... Of, \$115 billion just for 2025 alone. And there were 276 deaths from this.
- And, There's also a significant number of deaths. I think that there's...
- Over the past 5 years, there's at least one major compressor station or pipeline explosion every year, so this is not safe.
- Please don't do it.

O10

Diane Keefe

01:03:21

Yes, I do. Thank you very much. I'm Diane Keefe. I'm a resident and long-term

- Connecticut person from Norwalk, Connecticut. It's disappointing to me that a Democratic administration is turning its back on an executive order to decrease greenhouse gas emissions.
- Instead, DEEP has been blindly implementing the governor's all-of-the-above strategy, which effectively reinforces continued natural, in quotes, mostly methane gas infrastructure development.
- I oppose this expansion of the Brookfield station because of the near-term impact of increased methane emissions. Methane creates over 80 times the damage of carbon dioxide emissions in the first 10 years after its emission.
- Emitted. Front-loading damage in a time when we should be preventing it.
- An adjudicatory hearing is necessary to address the serious air quality issues that have been raised by other testifiers.
- And we really do deserve that kind of accountability from the administration. We're in a severe ozone non-attainment zone, and we know that the federal government is not protecting us against climate change.
- In fact, they're denying it, so Democratic Connecticut government needs to stand up for it. Also, Iroquois is owned by international energy giants whose legal obligation is to maximize shareholder value
- And that is not what the state of Connecticut should be worried about. They should be concerned about Connecticut citizens and their health.
- Commissioner Dykes and Governor Lamont should explain to Connecticut residents why they're prioritizing the interests of multinational energy companies over the health, safety, and economic stability of Connecticut residents. Why is new methane infrastructure being approved when the evidence clearly shows that compressor stations
- Gas leaks frequently.
- Increased natural gas as a percent of total energy supply creates higher electric prices for all nutmeggers, and increased price volatility, is
- in part of our electric grid more than it needs to be. We need to rely on more renewables, and the emissions measurement systems need to be improved so that we can actually assure
- That, citizens are not,
- Unduly exposed. Additional methane gas emissions from the facility will impede DEEP's mandate to achieve the state's climate law requiring emission reductions. As a lifelong Democrat, I expect more of my state government than empty promises. Let's practice what the executive order proclaimed, and thank you for your attention.

011

Susan Eastwood

01:06:22

Thank you.

- Yes, thanks for the opportunity to speak today. Just turning on my...

- timer for myself. Great. So, I just wanted to add my, agreement that this permit deserves an adjudicatory hearing for lots of reasons that you've heard, but particularly for the children of our state, and especially for Brookfield.
- And I have submitted comments, and I will do it again, but I will summarize today. As you know, the compressor stations are highly toxic facilities, and I am very concerned about the way that
- the, emissions standards were calculated in this case. If it's unlawful, it certainly should be,
- taken to court, or at least corrected by DEEP, that would be much better.
- But to summarize some of the objections, which you'll hear more about, I'm sure, Connecticut doesn't need this gas. We're not going to get this gas. It's going to pass through, and we're going to be paying for it with our health and with the death of residents, including our children, who will be affected for their entire lives.
- Additional greenhouse gas emissions from this facility will probably prevent DEEP and Connecticut from achieving their mandate under state climate law requiring emissions reductions.
- And Kirkfield and all of Fairfield County already, as you've heard, is in a severe ozone non-attainment zone. Adding more to that should be... should be criminal, even if it's not. Providing, oops, providing,
- More done... needs to be done to require this facility and facilities like it to lower emissions.
- As you've just heard, pipeline safety is very risky, leaking all over, all of the pipelines. So, why don't you spend the money, I'm speaking to Iroquois, I guess, now, testing those leaks and fixing those before you put any more pressure on a system like this?
- So, I just wanted to...
- go back and urge you to remember your mission, providing a healthy environment for the state of Connecticut, and especially for the Chaders.
- Sorry about that. And I'll leave it at that for today. Thank you.

O12

Kim Fraczek, Director, Sane Energy Project

01:09:04

Hi there.

- Ugh, here we go again. Good evening, my name is Kim Fracek, I'm the Director of SANE Energy Project. We represent about 15,000 members of the public.
- Who work to protect their health and our collective climate.
- And I've spent nearly two decades working with communities across the tri-state region on the impacts of climate, pipeline and compressor station expansions, witnessing first-hand health, safety, and environmental consequences of poorly planned fossil fuel infrastructure.
- And before I address the project, I...
- I just want to note how this hearing began. The first three presenters, Michael Kinnick, James Grillo, and the Iroquois team,

and the attorney, you know, they spoke calmly about their jobs while completely ignoring the harm, that the project will, have on people, wildlife, water, and air.

- affected by this expansion. It's... it was frankly nauseating to hear the infrastructure technical details discussed as if communities and ecosystems didn't work and don't exist.
- So, the segmentation is not only immoral, but it's Deep's responsibility to do your jobs and to serve the people, and everybody on this hearing so far has asked for an adjudicated process, so I urge you to follow the lead of the people that you're supposed to serve.
- And I say this not to attack deep, but to highlight the human reality behind these technical descriptions. These are neighborhoods, ecosystems, and lives. You heard from students and parents of the middle school nearby. This is not just abstract lines on the map.

01:11:02

So I live, I live in downstate New York in Brooklyn, and I'm directly affected by the Iroquois Pipeline as a National Grid customer. So, National Grid, the gas utility here, pushed for the Iroquois Pipeline expansion.

- Which intersects with Brookfield. This expansion is not... like, the gas... we don't even need the gas. National Grid's own numbers say that we don't need the gas, and I will get... send that to you to look at this. I've been fighting this for nearly 7 years now, and...
- This expansion is not wanted by the public, and it will cost millions in higher rates, and expose your constituents, the residents of Connecticut, to additional air pollution for gas that we don't even need.
- You know, we should not be forced to pay to poison our neighbors across the Long Island Sound so a multi-billion dollar corporation can profit while misleading the public.
- You know, a fun fact, the CEO of National Grid makes \$4,300 an hour. She's based in Trafalgar Square in London, the UK, and, you know.
- National Grid is the largest importer of LNG in Europe at grain. So these are bad players. This is not just, you know, listening to your local Connecticut guy who happens to work at, Iroquois Pipeline Company. Like, this is a massive international expansion that does not serve
- The constituents that you are supposed to serve.
- So, please, listen to your people, like...

013

Tai Michaels | Sunrise Project NY

01:14:17

Great, thank you. I just wanted to follow up on the point that was just made by Ms. Frextech, which is that New York City does not need this. The people behind this expansion, National Grid and Con Edison, the gas providers here in New York, are the ones funding this project, and I want

to point out that it is not only bad for Connecticut, but bad for us as New Yorkers.

- I'm a New York resident, but I was a long-time Connecticut resident before this, and I'm here
- as part of Sunrise Project New York City, a climate activist youth group.
- I just want to point out that
- The same problems that we're listing about Brookfield are also true on the receiving end of this project in New York. This pipeline runs to New York, which is also an entire area that is in huge ozone non-attainment, just like Brookfield. We also face rapidly rising gas bills, just like much of Connecticut.
- And at the same time, we have stated strong climate goals here in New York City, which make this project not only inadvisable economically and inadvisable from health perspective, but just make
- just plain doesn't make sense. New York City has passed an All Electric Buildings Act, and that covers the entire city, and as it's going into effect, fewer and fewer buildings will need gas power.
- At the same time, National Grid, as Ms. Fraxic pointed out, has noted that it doesn't need this gas expansion for its gas supply, so why are they approving this project? Well, the answer lies in how utilities work. Utilities customers have to pay for this expansion no matter whether it's necessary or not.
- Gas utilities make money by building projects, not by delivering on their customers' needs. So in the end, it is New York customers footing the bill for this expansion, which is going to harm the residents of Brookfield.
- As I mentioned, the state has also set strong climate commitments.
- In the state's own climate law, we've set strong commitments for where our emissions need to be in 2030. Goals that the state is not meeting.
- State courts recently ruled and ordered the state government to take stronger action to meet these goals. So how is building more gas pipelines into the state gonna help meet this? At the same time, New York State just approved the Williams-Nisi pipeline.
- Which will bring 400 million cubic feet of gas into New York City every day. That is enough to power 5.5 million homes. So why would we need another project adding to this burden?
- In the end, this is gonna just contribute to New York City residents paying with their pockets for a project that they don't need, while at the same time, Brookfield residents are paying with their health for this same project. Thank you.

O14

Sydney Collins

01:17:15

Hi and good evening. My name is Sydney Collins, and I work and am an alumni at the University of Connecticut, working across UConn's regional campuses.

- I'm here today because this permit decision affects the thousands of students from Fairfield County, including Brookfield, with over

4,000 of them attending our source campus, and more than 3,000 of the students at UConn Stanford.

- This proposed expansion would add two methane gas-burning turbines that produce over 125 million cubic feet of gas per day. This means 80,000 more metric tons of CO2 each year, and over 25 tons of nitrogen oxides.
- Many of our students already struggle with asthma, respiratory illness, and other health conditions that can either be tied to where they grew up and or made worse with more pollution. And it's Deep's responsibility to provide them a healthy environment and not to make it worse.
- I'm deeply concerned that DEEP has denied the community an adjudicatory hearing. Our students are taught to engage critically, ask questions, and rely on data, yet this process denies them and their broader community any meaningful ability to ask questions, ask for evidence, or appeal a decision that puts their health at risk.
- Also, as someone that works at a research-based university, I find it unacceptable that this permit relies on self-reported admissions from a fossil fuel company with a documented history of environmental and safety violations, including felony convictions and \$22 million in fines.
- We live in a state with an incredible world-class research institution like UConn that could support stronger monitoring and help develop a generation of scientists, but instead, Deep chose a cheaper path and a worse-off one.
- While Yukon itself is legally required to comply with the Global Warming Solutions Act in our own decarbonization efforts, I find it pitiful that this state and fossil fuel companies are not held to the same standard, as this premise undermines Connecticut's own climate laws by increasing local pollution and ignoring lower emissions technologies.
- I urge DEET to deny this permit, require an adjudicatory hearing, and uphold its responsibility to protect the public health of our students and our climate. Thank you so much.

015

Kerry Swift

01:19:43

Hi, I'm Carrie Swift. I am a 35-year Brookfield resident.

- And we've been breathing these emissions for almost 20 years now. My son, now grown, I'm also, I live about a mile from the site. My son, now grown, suffers from asthma. No child should have to struggle to breathe. Given our status as a severe non-attainment zone, and
- At 11%, Brookfield's nearly double the national average rate of childhood asthma. Clearly, DEEP has forgotten the P stands for protection.
- Scientific medical consensus is that the types of emissions from these turbine stations emit cause asthma, cardiac disease, and cancers. Setting our suffering aside, we can break this down to dollars spent.
- Dollars on medical bills, lost productivity, and missed school and work. Studies have shown children 10 to 12 the age of whiskoneer

students exposed to pollutants never develop their full lung capacity. Therefore, a compensation fund should be established

- to reimburse residents for our medical expenses and lost time from both school and work. What DEEP is allowing is the picking of our pockets in order to stuff the already full pockets of TC Energy and Enbridge. Also, while I know this is the Air Division.
- Deep is responsible for the protection of our drinking water as well.
- I want to put on record the mistake in the FERC permit EA, which states we have a public water supply.
- Our entire area is actually on private well water. I have written for several years trying to have this correction made, but neither TC Energy nor FERC have fixed this issue. It's apparently disgraceful.
- I would also protest that this is not an adjudicatory hearing, and this permit should be denied.
- And that's all I have to say for tonight. I will submit more... more written comments. By the way, I still haven't heard back on my letter of 2 years ago, on multiple letters, so...

O16

Sarra Bridges

01:22:07

Thank you for the opportunity to comment this evening. My name is Sarah Bridges, and I'm the Northeast Project Coordinator at the Environmental Health Project, a nonprofit organization defending public health in the face of oil and gas development.

- EHP is opposed to the expansion of the Brookfield Compressor Station because it would be detrimental to the health of nearby residents. Every stage of shale gas development poses public health risks, including compressor stations, which emit a mixture of chemicals that are known to be harmful to human health.
- The proposed changes to the Brookfield Compressor Station will increase emissions of greenhouse gases, nitrogen oxides, particulate matter, sulfur oxides, carbon monoxide, and volatile organic compounds.
- A particular concern with this expansion is ozone. While not directly emitted from compressor stations, other pollutants emitted from the facility, including NOx and VOCs, contribute to ozone formation.
- This expansion would significantly increase nitrogen oxide emissions from this facility, increasing ozone formation in Fairfield County, which has been in serious or severe non-attainment for the National Ambient Air Quality Standards for ozone every year since 2012.
- The health impacts of ground-level ozone include respiratory symptoms such as throat and lung irritation, reduced lung function, and worsening of existing conditions such as asthma and bronchitis. Expanding this compressor station would increase the cumulative ozone pollution burden for the county, and thus the public health impacts for community members.
- Emissions of toxic pollutants from compressor stations happen in a variety of ways, including blowdowns, incomplete combustion, leaks,

and accidents. Once emitted, these pollutants can travel significant distances depending on various factors, including weather conditions, wind direction, and topography.

- EHP's pollution dispersion modeling has shown that the local topography results in unequal dispersion of pollutants ranging from 6 to 12 miles from the facility.
- Within this area of likely pollution dispersion are several recreational and community gathering spaces, including parks, trails, schools, childcare centers, businesses, and churches. The varied terrain in this area, as well as changing weather conditions and intermittent emissions from the facility, contribute to short-term episodic air pollution exposures, which can trigger acute and chronic health impacts.
- A map showing the modeled air pollutant dispersing can be found in our written comments.
- In addition to the level and duration of air pollution exposure, additional factors contribute to the health impacts experienced by individuals and communities.
- Some people are more vulnerable to air pollution, including children, older adults, expecting or new parents, and individuals with chronic respiratory or cardiovascular conditions. There are 21 schools within a 5-mile radius of the compressor station, with one middle school only 1,900 feet away. There are also more than 800 homes within 1 mile.
- The additional air pollution, a consequence of the expansion of the facility, would impact young learners and other vulnerable groups of people living near this compressor station the most.
- In summary, HP recommends the Connecticut Deep reject the permit applications to expand the Brookfield Compressor Station, given the known public health impacts associated with the air pollutants emitted from the compressor station, Fairfield County's non-attainment status for the NACS for ozone, and the proximity of homes and schools to the compressor station
- Preventing an increase in emissions would prevent further harm to the health of the Brookfield community and beyond.

O17

Michael Ungaro

01:25:30

Thank you. Hello, everyone. My name is Michael Langaro. I'm a Hartford resident, an attorney, and I volunteer with Sierra Club.

- I urge Deep to deny this gas company a permit to install additional methane gas turbines at the Brookfield Compressor Station, which would increase its compression force and double the amount of gas it pumps through the connected pipeline.
- In its current state, the compressor station already emits excessive amounts of hazardous pollutants, including volatile organic compounds such as benzene and toluene, and greenhouse gases. It's a highly toxic facility that burns gas to create pressure along the gas pipeline. And the pipeline that the station pressurizes is old, unsafe.

- and susceptible to leaks. Making matters worse, the station is in a neighborhood where people live and children go to school nearby. There's a middle school less than 1,900 feet from the facility. 2,000 residents, including 674 children, live within a mile of the facility.
- Expanding the compressor station would make everything worse.
- The strain put on this old pipeline from doubling the pressure from the station would make it more vulnerable to accidents and leaks. An expanded compressor station would produce more greenhouse gas emissions and would leak more methane due to the greater gas volume.
- This would expose the nearby residents and the children at that school to more health-harming pollution on a daily basis, and increase the risk of a major environmental accident.
- DEEP should prioritize the health and welfare of these residents over the profits of this gas company, and deny its
- permit requests. Providing for a healthy environment is part of DEEP's mission. DEEP is also mandated to achieve the state's climate law requiring emission reductions. Granting this permit would be in contravention of that mandate by increasing greenhouse gas emissions from the facility.
- If DEEP is not prepared to outright deny the permit request at this time.
- In the interest of transparency and fairness to the people of Brookfield, it should be... it should at the very least reverse its decision and hold an adjudicatory hearing.
- This would allow all of these issues to be fully examined, with questioning of Deep and the gas company, expert testimony, and evidence. Thank you.

O18

Madison Spremulli

01:28:24

Thank you.

- My name is Madison Sprimuli, and I am a lifelong resident of Bethel, Connecticut, and my home is less than 2 miles from the Brookfield Compressor Station.
- I am asking Connecticut Deep to prioritize environmental and public health over a company's financial gain.
- If DEEP approves this permit, the department would blatantly contradict its own mission, as well as state and federal laws by increasing greenhouse gas emissions. I do want to echo some of the comments before mine, that testing from the applicant is not enough. The applicant can test and retest the air quality until they get the results they want.
- We need continuous air monitoring and testing from deep at a minimum.
- I also want to echo the comments from Sarah that the topography where the compressor station is holds pollutants in the valley, which exaggerates the harms of the pollutions, especially because the school is in such close proximity, we do not need those pollutants sitting

- There, with the students.
- It is incredibly disheartening to know that the financial gain of private polluters is more important to the state and to DEP than the well-being of Connecticut residents.
- To give the green light to expand a pollution source discredits DEEP entirely. This is a Department of Environmental Protection, but in what way does a compressor station expansion protect the environment or benefit from the Connecticut residents?
- There are many reasons as to why DEEP would deny this permit, and I'm struggling to find a viable reason as to why DEEP has tentatively approved this permit.
- Because of this, I urge DEEP to reconsider, or at least allow for an adjudicatory hearing. The people need a chance to speak and express their concerns, and to...
- you know, question in more than just a public hearing. So, thank you for your time.

O19

Nivo Roveto

01:30:27

Okay, I'm ready. Good evening, everyone, and my name's Nivo Rovito. I live, west of you all, in Dutchess County, New York, where our misguided Department of Environmental Conservation gave air permits to the Iroquois EXC project.

- Near me is the Dover Gas Compressor Station, which, along with the Athens station in New York, is slated to be augmented to raise the pressure for this Iroquois project.
- And the pipeline goes right through my county.
- Please do not make the same mistake in Connecticut that we've made in New York.
- Don't let the gas companies greatly augment the pressure in the line. Deny the air permits. Brookfield, the Northeast, and the Earth deserve better.
- We've heard all about the mitigation technology that is being implemented for the compression.
- to reduce harm, but it is still polluting and causing harm, and the CO2, when that gas is burned, is killing our planet.
- The gas is not needed, as several have said, and the expansion will make it more difficult for us to wean ourselves off of fossil fuels that are causing health impacts, as well as pushing our global climate
- To the point of uninhabitability in large areas of the world. Why is Iroquois even needed when we also have the Nessie-Williams pipeline approved, as someone else pointed out?
- The fact is that neither is needed. Extra methane gas is just an excuse for gas companies to profit by investing in infrastructure that they will get a guaranteed return on. And what about affordability? Gas prices are volatile, while solar is cheapest.
- With added utility-scale batteries, we can blunt those huge price spikes in energy.

- Your approval means making the same mistake that New York State's DEC made.
- The result? Higher costs to ratepayers, poorer health for residents, increased risk of explosions, and a bailout in the future that taxpayers will have to foot the bill for as the methane infrastructure becomes a liability, and more pollution.
- Besides, the old pipeline has safety flaws, more pressure increases the risk of trouble. The project is misguided, unnecessary, harmful, and contrary to protecting the environment. Do your job.

O20

Caroline FRIAS

01:33:13

Thank you.

- I'm Caroline Frias. I am a lifelong resident of Brookfield. I have lived within the compressor location within a mile since I was 6 years old.
- So I'll just give you my comments. The constitutional standard ensures that we receive fair procedures when the government interacts with our property, safeguarding our ability to use and benefit from it.
- The proposed pipeline expansion further disregards this standard, and by doing so, our right to healthy and clean air and the safe use and enjoyment of our property. As such, I would like to offer the following points for the record.
- Fairfield County, including Brookfield, has the worst ozone pollution in New England. This is dangerous for me, as well as other residents. I have lived, as I said, within a mile of the compressor location since I was 6. I am at a higher health risk from exposure to dangerous emissions.
- I've had asthma since I was 16. The project will only worsen my current condition.
- I wonder what pollutants are in the air that I am breathing on a daily basis. I'm very prone and predisposed to bronchitis and other upper respiratory and lung issues.
- As a child, I attended Wiskiner Middle School, which is less than 1,900 feet from the Iroquois facility. There has never been, and is not today, a safe or effective emergency evacuation plan for Wiskiner Middle School. Can you picture a mass casualty event
- Where roughly 790 students plus staff need to be evacuated. There is only one entrance and exit to the grounds. It's a disaster in the making, which would result in hundreds of unnecessary injuries and deaths. How would you feel if your child was exposed to these dangers daily?
- A massive explosion on a school day. Unimaginable casualty. Think about it. Really sit and think about it.
- We are entitled to an adjudicatory hearing. By denying that right, you continue to effectively turn your back on our children and families and residents of Brookfield, as well as surrounding towns.
- In conclusion, this project violates current safety and emission regulations and shows little to no regard for the health and safety of the people that live or work in Brookfield, their families.

- or the right to use and safely enjoy their property. Simply put, the project does not meet the constitutional standard. Please, we have a right to be heard and have
- The ability to present evidence And...
- have a ruling from a judge. We're entitled to an adjudicatory hearing. Thank you.

O21

Samantha Dynowski

01:36:03

Thank you. Good evening. My name is Samantha Danowski. I'm the State Director of Sierra Club's Connecticut chapter, representing 30,000 Sierra Club members and supporters in Connecticut. We urged you to deny the permits that are being requested by Iroquois Gas.

- In these 3 minutes, I'll summarize some of our key concerns, but I will be submitting written comment
- for Deep to respond to.
- And the first issue I want to touch on is unreasonable pollution. The addition of two new methane gas-fired turbines at the Brookfield Compressor Station will add unreasonable pollution.
- to the already compromised air in Brookfield and Fairfield County. The U.S. EPA has designated Fairfield County a severe ozone non-attainment area. That's a standard set to protect public health because of the health risks from high ozone levels.
- These permits would allow for 24.9 tons of additional NOx and ozone precursor to be emitted per year in this severe ozone unattainment zone, adding to the already poor air quality.
- Secondly, the limits and controls required by the permits.
- as well as the monitoring, reporting, and DEEPS enforcement are all inadequate to keep this facility below
- 25 tons of NOx per year.
- While the permit restrictions purport to keep the operation.
- to 24.9 tons of NOx, just a hair below that 25
- ton limit that would require a major modification, there are serious questions about the sufficiency of those restrictions and Indeed's ability to effectively monitor and force the restrictions.
- On the sufficiency side, expert analysis submitted with Sierra Club's previous comments conclude that off-cycle operations of just a few minutes per day
- as well as other operating scenarios would push the emissions above the 24.9 ton limit. On Deep's ability to effectively monitor and force, in 2024,
- Deep held a public hearing 10 years after the Cromwell compressor station violated its pollution restrictions. The permits contemplated here have similar limitations and requirements.
- that the compressor station in Cromwell has. How is DEEP going to ensure that these permit restrictions are followed when it wasn't able to do so in Cromwell?
- Unless DEEP requires continuous emission monitoring of all emission points, including the existing combustion turbines, emergency, and

other internal combustion engines, the public cannot be assured that the facility is adhering to the restrictions of the permit.

- Finally, an adjudicatory hearing is necessary to address these concerns. While I appreciate, and Sierra Club appreciates, the opportunity to voice concerns at this hearing, it is simply no substitute for an adjudicatory hearing.
- In sum, we urge you to deny the permits and put our clean air and our residents' health before that of this giant, profit-driven energy company. Thank you.

O22

Sena Wazer

01:39:20

Okay, good evening, my name is Senna Weezer, and I'm here today to testify in opposition to the proposed expansion of the Brookfield Compressor Station.

- Already, people have spoken to the devastating health impacts, procedural irregularities, and concern over the continued expansion of fossil fuels. I echo all of those concerns.
- In my testimony, I want to highlight the emissions and climate impacts of this decision, and the misalignment with our state's climate targets.
- Connecticut has strong greenhouse gas emission reduction targets of 45% by 2030, and net zero emissions by 2050.
- To me, those goals represent a commitment from our state, and particularly from DEEP and Governor Lamont, to ensuring that young people like me have a future to look forward to.
- A statement that while we might live in the fastest-warming region of the contiguous United States, and while we are a small state, our elected officials and our agencies, most importantly DEEP, which is charged with protecting our environment and helping to move towards cleaner energy, will take climate action seriously.
- But the past years of climate advocacy have forced me to question that commitment.
- Over and over again, community members and advocates have laid out in detail the harm that this expansion would cause to air quality, to the health of residents, especially the middle school students 1,900 feet away, and to our climate.
- And yet it appears that DEEP has become an agency that rubber stamps fossil fuel infrastructure, despite its clear harmful impacts on the community, despite the fact that if this expansion is approved, it will produce enough emissions to ensure that we don't meet climate targets, which we're already falling behind on, and despite the fact that we are seeing climate change in our communities now.
- And so I'm here today to ask DEEP to deny this permit, and to grant the community an adjudicatory hearing, to take a meaningful stand on fossil fuel infrastructure, and to stop rubber-stamping the very thing harming our communities and destroying our future. Thank you.

O23

Eric Myers

01:41:30

Good evening, my name is Eric Myers. Thank you for the opportunity to comment on this,

- On this, these tenancy permits. In a past life, I was an environmental regulator, as well as an applicant and permittee.
- And building on that, I have never seen or heard of a hearing officer being an employee of the agency where the hearing occurs. Other jurisdictions try to create some separation
- From the permitting agency. I can't say with certainty that this is a kangaroo cork, but it sure smells like a marsupial.
- Last year's Public Act 2584 amendments were intended to cut down on frivolous adjudicatory hearings, according to testimony from
- deep staff.
- When Iroquois' tentative draft permits were issued in July 30, 2025, three petitions were filed for an adjudicatory hearing, all rejected for procedural reasons.
- Petitioners were denied an opportunity to remedy the deficiencies. It seems the department is more than happy to shield their staff from the challenge of an adjudicatory hearing.
- The second problem with the procedures in this case is the inability to get a complete set of documents from the agency's files. We've requested files... we've requested documents from the basement file room, and
- received nothing that was, adequate. We filed a FOIA request, which took, approximately four to four and a half months to file, which isn't very helpful in a timely action. So.
- The whole, FOIA access to files is really flawed and really deep, in my opinion.
- And the final deficiency area that's been mentioned recently, are DEEP's monitoring requirements and enforcement protocols. There is no way that infrequent stack testing and monitoring runtimes can accurately measure
- NOX charges to ensure they are under the 25 allowed under the draft permit.
- A real-time monitoring protocol must be put into place.
- to do that. Given the enforcement actions against gas-fired turbine compressors, monitoring may not particularly matter. Only two enforcement actions were found against these type of facilities.
- One at the Cromwell Compressor Station took almost 10 years to resolve, and did not contain a significant financial penalty
- or any effective deterrence for violating permit conditions. Another violation at the Milford Compressor Station has been ongoing for 5 years with no resolution in sight.
- Based on the above procedural deficiencies, we demand that the tentative permits be withdrawn pending an adjudicatory hearing where DEP is questioned under oath about its procedures and draft permits.
- The tenancy permits are totally inappropriate areas.

01:44:44

- for ozone adjacent to the town's middle school, especially when there is a feasible non-polluting alternative, electric motor drive compressors. Thank you.

O24

Jonathan Webster

01:45:03

Thank you, I'm Jonathan Webster. I'm a climate activist with Extinction Rebellion from Easton, Connecticut.

- Simple truths about this project are getting buried behind technical jargon and regulatory shortcuts. A 2015 peer-reviewed study published in Environmental Science and Technology directly measured methane emissions at 45 compressor stations and found leakage at every site.
- Crucially, the researchers found that emissions were highly skewed. The highest emitting 10% of the stations accounted for roughly half of the total emissions.
- This means two things. First, you cannot rely on averages to estimate real-world pollution from compressor stations, and second, you cannot know in advance what sites will become super-emitters, because high emissions arise from normal operating conditions, not just rare accidents.
- Another key point. Natural gas sets the marginal price of electricity. When gas prices rise, electric bills almost always follow. Adding more gas infrastructure does not fix this structural flaw.

O25

Jonathan Webster

01:46:16

Recent peer-reviewed research found that dependence on gas.

01:46:19

electricity price volatility compared to systems with more non-fossil generation. Deep denied an adjudicatory hearing for this project. That hearing would have allowed the public to test Iroquois' claims and assumptions and require evidence to support them. Denying it shields those assumptions from public scrutiny.

- The same studies that documented methane leakage at compressor stations also exposed a deeper problem, how emissions are measured and reported. Under current protocols, only about 38% of measured methane emissions are reported. When you include super emitters, that number drops to 25%.
- This means that DEEP is relying on data that is known to systematically underestimate air pollution.
- The same pollution linked to negative health impacts for exposed communities.
- Deep is showing textbook example of regulatory capture. As Diane mentioned earlier, Iroquois is not a local utility. It's owned by energy giants TC Energy and Berkshire Hathaway Energy, whose legal obligation is to maximize shareholder value, in this case at the expense of the residents of Brookfield.
- Why is DEEP prioritizing the interests of a multinational energy giant over the health, safety, and economic stability of Connecticut residents? This project is not a minor upgrade with no meaningful impacts. When you account for the health, climate, and economic costs, it is a life and death issue.

- This is about asthma and air quality for Brookfield residents and students at the middle school, only 1,900 feet away. It's about cementing electricity bills to volatile gas markets, and whether or not DEEP actually serves the public.
- The path forward should be clear. Grant an adjudicatory hearing, put the full science and facts on the record, and stop approving infrastructure that deepens climate risk and price instability. Connecticut does not need more methane, it needs renewables, it needs battery storage, and it needs accountability in the executive branch.

O26

Brian McGovern

01:55:18

I'm ready. Good evening, my name is Brian McGovern. I'm a resident of Brookfield. I'm speaking in firm opposition to the proposed expansion of the Brookfield Compressor station.

- I want to begin with process. Deep denied Brookfield and the community organizations an adjudicatory hearing, the only form that allows questions, evidence, and appeal. What we have tonight is not meaningful participation, although I do appreciate being heard.
- It is a procedural checkpoint. That alone should give deep pause before issuing a final permit of this magnitude.
- Substantively, this proposal defies both environmental reality in common sense. Brookfield and all of Fairfield County are in a severe ozone non-attainment area, the worst in New England. Adding new combustion sources of nitrogen oxides.
- volatile organic compounds and fine particulates in this location. It's not just ill-advised, it's inconsistent with DEEP's statutory obligation to pursue attainment of federal air quality standards for our community.
- This facility is located less than 1,900 feet away from a middle school, and within a mile of thousands of residents, including hundreds of children's and seniors.
- DEEP's own mission include protecting public health, approving a permit that knowingly increases exposure to pollutants linked to asthma, cardiovascular disease, and premature death contradicts this mission.
- I'm also deeply concerned by Deep's decision to reject lower-emission technology, such as electric motor drive and selective catalytic reduction, primarily on cost grounds. The law requires best available technology, not cheapest available technology.
- When the burden of the pollution falls on the public, cost cannot be the decisive factor.
- Finally, this expansion is incompatible with Connecticut's climate law. Increasing combustion emissions and methane leakage from an aging pipeline system moves us further from, not closer to, our legally mandated greenhouse gas reductions.
- Brookfield receives no benefit from this expansion, no energy security, no price relief, no jobs, only increased risk. I urge DEEP to deny this permit, require the full hearing, and place public health and the law above expediency. Thank you.

O27

Ian McDonald

01:57:43

Yeah, well, first of all, I would just like to second the comments by Sarah Bridges, Samantha Dynowski, and SennaWazer in terms of localized pollution.

- And several of the other points they raised there. I'll just say, you know, I'm in Killingly, Connecticut, and we have an 840 megawatt power plant.
- And we had another large power plant proposed that thankfully didn't get built. But I've been coaching soccer the last few years, and...
- there isn't a, I don't think I've had a season, where I haven't had a kid who's been kind of dealing with asthma and struggling with asthma.
- And my son has asthma as well. And, and it's scary, it's scary when it's your kid, it's scary when it's somebody else's kid.
- And... You don't know how much they can take, how much they can run.
- And parents don't even know it. And, in fact, we had a kid who died just a couple years ago, not one of my, on my teams, but on a baseball team, about my son's age from asthma. And...
- what I can say pretty clearly is that this expansion is not going to help any of those kids with asthma in Brookfield.
- You know, it puts parents and coaches and all kinds of people in a difficult spot of
- you know.
- are they... maybe this is a town they grew up in, and they're wondering, you know, am I not doing the right thing for my kid?
- By being here. And it's very scary when you see them already struggling with something, and now we're gonna do something that's gonna make it worse.
- And... I'll leave that at that. I'll also say,
- You know, in terms of the climate, both the state's climate goals.
- and just the overwhelming scientific consensus on climate change, that we shouldn't be expanding things. I don't think that's a controversial statement from a scientific perspective.
- I don't... Know that that message has really, settled into,
- Deep, or maybe this is the last one they're gonna permit, but it seems like there's always one more.
- And, lastly, I'll just say that
- In terms of Caroline Fry's, comments about concerns about emergency situation.
- You know, we had a fire at our power plant,
- I think 2 years ago, and it's a very scary situation for our local firefighters. There was...
- real uncertain things, there were some very unexpected things that happened that there wasn't in their training. They've been...
- One of them has expressed to me his frustration that they haven't gotten adequate training to deal with fires at this facility, and I think there's a lot of promises made, but I'm very concerned that

the same could be true for this Brookfield Compressor station. And so, please deny this permit.

- And at a minimum, have an adjudicatory hearing. Thank you.

O28

Kate Donnelly

02:00:52

My name's Kate Donoy, I'm from Hampton, Connecticut, and I'm here today to voice my strong opposition to DEEPS granting an air permit to the expansion of the two gas turbines at Brookfield Compressor Station.

- It's DEEP's role to protect the environment in the state of Connecticut.
- And this responsibility would be violated by this expansion. DEEP's role as the managers of our state's stated climate goals also contradicts granting the expansion of the Brookfield Compressor Station. Residents of our state look to DEEP to protect us from environmental hazards.
- This expansion not only negatively affects those in Brookfield, but all of us in Connecticut, as pollution knows no boundaries.
- The state of Connecticut has to deal with the immense environmental burden of this project without any energy benefits for our state. Just because an energy company decides it wants to seek more profits from fossil fuels
- and can hire lawyers who can properly fill out the paperwork for permits does not mean that the permits should be granted. We look to DEEP for protection against dangers to our health and environment. Approving this permit will increase toxins into our environment with the burning of dangerous methane gas. It will make
- worst... the worst ozone pollution in New England, even worse. It will increase smog, which leads to chronic respiratory illnesses, including asthma.
- It will put children and seniors with pre-existing conditions at higher health risks from dangerous admissions. This project will put added pressure on the aging pipeline that was built in disregard for public safety.
- Due to the age of the pipeline and the way it was built, it is susceptible to leaks and ruptures.
- Additional greenhouse gas emissions from this facility will impede DEEP's mandate to achieve the state's climate law requiring emission reductions. The expansion of the compressor station is not compatible with this law.
- The compression station will reduce more... produce more greenhouse gas emissions from combustion, and will leak more methane gas due to the greater gas volume from blowdowns.
- We in the state of Connecticut are indeed in a crisis, not only from pollution, but from high energy prices. Approving this expansion will not help us lower energy prices, or help us move forward onto affordable, clean, renewable energy.
- But for all these... with all the reasons against expansion that were talked about tonight, and so many more, I fail to understand Deep's

rationale for granting approval to this expansion, and urge you to take your role seriously as a state's protectors of the environment.

- And not be a rubber stamp for the fossil fuel industry. Please do not issue the permit for this project.

029

Melissa Hoffmann

02:04:05

Hi, my name is Melissa Hoffman, and I'm an organizer with Food and Water Watch. We're a national organization fighting for clean air, safe food, and a livable climate.

- And I'm speaking out in opposition to this horrendous plan to expand the Brookfield Compressor station.
- I'm absolutely appalled that the Governor, Lamont, and the Deep would even consider going through with any kind of expansion of the Brookfield Compressor Station, given that there has been violation after violation at the site.
- And that the local community near the state has had to alert you and local authorities when malfunctions occur, and not the other way around.
- In short, this expansion cannot be approved because it's an egregious violation of the safety of Brookfield residents.
- It violates the rights of Connecticut residents to a clean and safe environment, putting further burden on a community that is already facing severe ozone pollution, and it's also against the state climate law.
- And I'm joining from the New York side of the fight against the compressor station expansion for the Iroquois Pipeline.
- Where over 8,000 New Yorkers sent in comments opposing the pipeline expansion, over 60 elected officials, 9 municipalities, and over 100 organizations have spoken out in opposition to the pipeline.
- Saying no to dirty, expensive, and dangerous compressor stations and pipeline expansions.
- Is a winning strategy, and we need more government leadership to step up and speak out against dangerous fossil fuel expansions.
- Our Lieutenant Governor in New York, Antonio Delgado, has stood out for the size of the people and not for polluters, and we really need Connecticut leadership to follow that example and speak out against these dangerous fossil fuel projects.
- If Governor Lamont issues the permits for this compressor station, he will be signaling to his constituents that he only cares about fossil fuel profits, and not the health and safety of his constituents.
- I sincerely hope that the governor and DEEP choose wisely, because Brookfield residents and the greater public
- We'll feel the impacts of climate change.
- And they should not be used as pawns in a game of corporate greed.
- Please do your job and deny these permits. Thank you.

030

Janet Bellamy

02:06:52

Hi, thank you for letting me speak. I'm Janet Bellamy, I'm a resident of Ashford, Connecticut. I'm a member of Sierra Club and on a board of a number of local commissions, and I've worked my adult life to leave our state cleaner and healthier for all of our residents. I oppose this application, I agree with most of the objections made.

- And I would just like to make 3 points. One is, how does this application meet Connecticut's Global Warming Solutions Act, which was updated last year to reduce greenhouse gases?
- And after the ratepayers have been charged millions of dollars, what are the chances that this project will become a stranded asset? As we know that renewables are now less expensive, not only to build and to operate.
- Then, fossil fuel facilities.
- And how is it possibly safe to approve this without continuous emissions monitoring? I urge DEEP to reject this, or at the very least, allow an adjudicatory hearing. Thank you.

O31

Syed Noorwez

02:08:19

Good evening, my name is Syed Norweiz, and I'm a student at Wesleyan University, and I'm here today in opposition to the expansion of the Brookfield Compressor Station.

- First of all, thank you for the opportunity to speak tonight.
- What troubles me most about the proposed expansion of this compressor station is the effects it will have on the children in the community.
- This compressor station is stationed less than half a mile from Wiskinyear Middle School.
- Which absolutely presents problems as it pertains to air quality. These compressor stations are known to pollute air and spread particulate matter where they're built.
- As a child, I experienced severe allergies, which were exacerbated by the worsening effects of climate change, and they made it harder for me to focus and learn in school.
- I cannot imagine the detrimental effects the existing compressor station would have had on a child like me, let alone the impact of doubling the size of the compressors in a county that already has poor air quality compared to the rest of the surrounding region.
- Furthermore, the expansion of the station does raise safety planning concerns. This project will put greater pressure on an aging pipeline and compressor station that is already in close proximity to a school, not to mention hundreds of homes.
- All of us have experienced school evacuations and drills and understand that even when plans are laid out, things can go wrong.
- In light of this little public consideration has been given to what would happen should a disaster occur, because these seemingly unimaginable incidents do happen.

- I remember watching in horror a few years ago as an overpressurized pipeline exploded in Merrimack County, Massachusetts.
- Having just been in middle school myself at the time, it's hard to express the concern and the angst I felt for my fellow citizens.
- It becomes increasingly difficult to understand that the problems I saw growing up will continue to be the same problems that shape the coming years of my generation.
- As Mr. McDonald said, it is scary when it's your child, or your family member, or your community member.
- But it's even scarier when you are that child at risk.
- For these reasons, I call on the Connecticut Department of Energy and Environmental Protection to deny the proposed permit and grant an adjudicatory hearing that allows community members to advocate for the protection of their children. Thank you.

O32

Ann Finneran

02:10:38

Yes, I am ready. I am more... I am Anne Finneran. I'm from upstate New York.

- And I watched... the hearings with Athens and with Dover in New York. I saw the,
- Repeated problems, duplicate problems, the same problems being repeated? Why are they being repeated separately?
- This segmentation is a major problem. Why does the industry get to have control over the same snake when the segments are being... having to argue the same thing over and over again?
- How many people are arguing the same thing?
- Why is the DEEP of Connecticut even considering this? It has nothing to do with their state.
- All the demerits and none of the benefits, unless some people are getting their palms greased.
- So, this is something that just must be denied.
- The DEEP... this is a moral... this is moral imperative, it's socially moral imperative. The DEP has the power
- to deny this permit. They have the power to reverse their decision and allow the adjudicatory hearing, and I call on the DEEP to do just those things.
- And the system, the system of segmentation must end. All the people together in all those segments
- have power over the industry. Thank you for the opportunity. I'm done.

O33

Kathleen VanDuzee

02:13:14

Great, thank you. I can't... my mouse is very finicky, sorry. So, I'm Kathy Van Duzzi from Brookfield, and a retired special education advocate.

- At this juncture, Connecticut deep decision makers must surely recognize that Brookfield Town leadership and residents are united behind the common goal of eliminating the high-risk effects of air

pollution currently and potentially generated from the compressor station compound right in our backyard, as you know.

- Initially, we collectively trusted this state agency to align with their department goal number one, which is...
- We are actively addressing climate change by advancing emission reduction strategies that support an affordable, reliable, and clean energy economy, and integrating science-based adaption and resilience planning into our stewardship
- of natural sources, state and utility infrastructure and operations, and our efforts to protect public health and safety, unquote. Yet, we're here
- We're experiencing the polar opposite of this promise to the people of Connecticut and our children.
- The 2020 Census calculates 28.5% of Brookfield population is under the age of 18.
- The 2025 American Lung Association State of the Air report indicates that life-threatening harm to humans living their lives in a non-attainment environment can only bring harm to our community, without question.
- The 2024 Connecticut Public Health?
- Asthma program surveillance Report clearly indicates their commitment to the Department 7 goals. The most important one, in our case, being reducing and eliminating exposure to indoors and outdoors environmental asthma triggers.
- The report referenced the CDC middle school asthma prevalence statistics.
- National, 6.5%.
- Connecticut is 8.5%. Brookfield, 11.5%, and these are their pairs of middle school students.
- How can Brookfield count on the Department of Public Health to fulfill its goal for these children when our community at large have no way of knowing what's in the air we breathe, or to assist these children if their air is polluted with invisible triggers?
- We need ambient air testing, and we've been asking for the past 3 years, and it's fallen on deaf ears in Hartford.
- The residents of Brookfield and surrounding towns can no longer shoulder the risks of fossil fuel pollution of any kind.
- Brookfields respectfully, respectfully, asking DEEP to rise to the challenge of meeting the goals of our state so that we here in Brookfield can abandon any further suggestions of expanding current sources of toxic pollutions once and for all. We need zero emissions.
- Please deny the permit, or at the minimum, afford us that hearing, and
- I'm just saying, we're just not having it.
- Thank you.
- Thank you for your public comment.

O34

Jill Fieldstein

02:17:21

Okay.

- Hello, my name's Jill Fieldstein. I am a resident of Dover, New York, home to one of the Iroquois compressor stations slated for expansion.
- Like Brookfield, the Dover Compressor Station sits just a few thousand feet from the Dover Middle School and High School.
- Our students and teachers are already at risk from the pollutants from the compressor station, and the proposed expansion will only further imperil the health and safety of Dover's residents.
- It's late, so I'm not going to repeat all of the compelling comments that have been made here tonight, but I certainly concur with all of them.
- I just want to implore DEEP to please do what New York failed to do. That is prevent the health and safety of New York's and Connecticut's residents from being put further at risk, simply to increase Iroquois' share price.
- Thank you.

035

Christine Feely

02:18:39

I'm Christine Feeley, and I'm here to oppose the expansion of the compressor station in Brookfield, Connecticut.

- Connecticut needs more environmental protection, not less.
- These are highly toxic facilities that emit hazardous pollution, such as benzene, which causes cancer, including leukemia, ethylbenzene, which causes liver and kidney damage.
- Xylene, which harms the nervous system, formaldehyde, which causes leukemia, and very small particulate matter, which can increase the risk of health problems like heart disease, and as we've heard, asthma, and also low birth weight.
- So the day-to-day operations are bad, but as noted by others, certain events can require the release of many, many tons of natural gas through emergency pressure valves.
- The excess pollution can cause acute respiratory events in people living or working nearby, and those events may require hospitalization in addition to the long-term effects. So the people who live, work, and go to school experience the typical emissions all the time, then they experience these emergency release events periodically, which vastly increase the amount of emission.
- So, the current compressor station is bad enough. Why should the pipeline be expended? As you've heard, again, not for the benefit of anyone in Connecticut.
- And not for, as it appears, for anyone in New York, and New York has not asked for the expansion. So, there's no more need... there's no need for more natural gas to be piped in New York. Only the consolidated Edison and the National Grid and their investors will benefit.
- It's time to stop poisoning Connecticut residents and leaving them vulnerable to explosion risks and emergency release events, as well as the day-to-day risks.

- Two of my close family members have been treated for lung cancer in the last few years, and even though their surgeries were considered successful, you're not the same after you've had parts of your lungs taken out.
- The nearby residents of the compressor stations are very vulnerable to this and other risks.
- Greed is a terrible reason to make people sick and possibly cut short their lives. Again, Connecticut needs more environmental protection, not less, and DEEP should say no to this expansion. Thank you.

O36

Joshua Caskey

02:21:36

Hello, I am Joshua Caskey. I live in East Lyme, Connecticut. I am also here today to express my opposition to the

- Brick-fueled compression, expansion.
- Also disappointed in the back of the adjudicaria hearing, that Deep failed to.
- have for, the community of, Connecticut, as well as, New York.
- I'm mostly concerned about the environmental impact of nitrogen oxide emissions, as well as the greenhouse gas emissions. As many others have said.
- Brookfield and the wider Fairfield area.
- have a very...

02:22:36

very, very bad nitrogen expansion or minor project, that does not mean that this will be a minor impact, to the community, especially considering how, Deep's analysis was flawed, as others have previously noted. This additional ozone

- will cause more cancer, will cause more asthma of Brookfield and Fairfield County residents. As for the environmental impact from the greenhouse gas emissions, this project would be directly opposed
- to the, governors and the DEEPS,
- goals for reducing the climate impact of Connecticut.
- Already, our state is not meeting those guidelines, and this project will only exacerbate that issue. So by
- moving forward through this permit will only lead us further away from meeting those goals, thereby meaning more people will die, our oceans will become warmer, and all of our shoreline will disappear as sea levels rise.
- Even though I'm not directly,
- living by this compressor station, its impacts will, impact me. I've, I... I drive through.
- Mr. Caskey again. I drive to, I live on the shoreline, so when the sea level rise... rises, my home will be, impacted by that as well.
- So in closing, I would just like to say that I urge the DEEP to deny this permit for expansion. We should be doing the exact opposite. We should be transitioning along.
- From, gas expansion and, transitioning more towards renewable energy expansion.

037

Mary Finneran

02:24:54

Hi, my name is Mary Finneran, and I taught in the Cooksaukee Athens School District. Athens is where the compressor station is, and the pipeline passes 1 tenth of a mile from the elementary school there.

- One... somebody mentioned the, fine that
- Iroquois was given in 95-96, when they built the pipeline in 92, they had done it very badly. They crossed streams and dredged and left the dredgings there, but they also, when they laid the pipeline, the fine was for a Clean Water Act, it wasn't for anything else, but they did note that when they laid the pipeline, because of
- time to rush it through. They used large stones and boulders to place the pipeline versus small gravel, which is appropriate. Though their pipeline is still... much of it is still on those large stones. It is not placed... it is not placed well. So...
- I... another person mentioned the maximum allowable pressure.
- For... it was 1440, Operate... maximum allowable operating pressure.
- But currently, it's about 600 that it runs, and they said that it will never exceed that. Well, it's going to get up over \$1,200, it's going to be extremely close to the maximum, and when you're going through a pipeline that is poorly constructed, they had a \$22 million fine in 1995 after it had been running for 3 years. You've got to consider what
- is going to happen. In Merrimack Valley, somebody else mentioned it. There was an accident where they were turning things on and turning things off, and they put too much pressure through a pipeline. It was just a service line. Just a smaller service line. But it destroyed 40 houses, and it destroyed an 18-year-old man's life.
- What is going to happen when they increase the pressure? And I'm so sorry for all you people in Brookfield, it breaks my heart, it breaks my heart for the people in Athens and in Dover. What is going to happen when they increase the pressure in this poorly built pipeline? What is going to happen? I want to read to you, and I'll close with this, the DEP mission, deep mission.
- The mission of the Connecticut Department of Energy and Environmental Protection is to conserve, improve, and protect the air, water, and other natural resources and environment of the state of Connecticut while fostering sustainable development. How can you possibly foster sustainable development when
- Nothing will be sustained when it's potentially going to be destroyed, and even if it's not any explosions, there's going to be so many emissions that... and air knows no borders. Stop this. You can stop it now, you don't even have to wait for an adjudicatory hearing. Just stop it.
- And if you can't do that, if you have to have the judge tell you to stop it, then have that adjudicatory hearing. All power to the people. Thank you.

O38

Pamela Krauss

02:28:20

My name is Pamela Krause. I was an environmental regulator, code enforcement officer, and out-of-state attorney, environmental attorney. I'm currently a resident of Brookfield. Deep, your process is biased, violated full public record access, shut out public participation.

- and does not provide for adequate enforcement. Therefore, a permit cannot be issued. These acts are inconsistent with policy and rules. Using a hearing officer, a deep employee, for this contested permit promotes bias and partiality.
- Past hearing records suggest a valid concern for a presidential prejudicial outcome.
- The permit is adjudicated without evidentiary fairness. Agency efficiency is substituting for proper administration, demonstrating your buddy up with staff and the applicant.
- Superior Court is now burdened with your bias as you and the applicant misutilize 2584 to shirk evidentially rigor.
- Not the intent of the legislation.
- DEEP did not provide proper file review and staff access, a basis for denial. Current project files were requested using DEEP forms, and published procedure initially produced ancient, closed files.
- The active file was elsewhere.
- In another file request, documents were missing that we knew were submitted. DEEP violates its own procedure and fails public access law.
- Last spring, a qualified expert submitted comments to DEEP concerning the gas turbines. Your staff engineer stated that DEEP does not have to respond.
- Now, an air permit supervisor says all comments will be addressed. Old ones, new ones, which ones? The public had no opportunity to engage until after the tentative permit.
- This reeks of bias.
- Against both lay and technical experts.
- Another roadblock on substantive issues. This permit involves a segmented facility located where every Brookfield child goes to our only middle school. Do your job, follow your own rules and policies, and insist that deep staff serve the public.
- Deep's record of enforcing permits for compressors is abysmal.
- Violations linger for years.
- Pitiful financial consequences encourages violations, like in Cromwell and Milford. The tentative permit does no better.
- There are butchered rules and policies enough for denial. Concerns have been ignored. In my years before local, state, and federal environmental agencies, this process and tentative permit is an embarrassing disgrace for DEEP. This permit should not be issued.
- Thank you.

O39

Jennifer Weber

02:31:25

Hi, my name is Jennifer Weber. I live in New Fairfield, Connecticut.

- This permit deserves an adjudicatory hearing to address the concerns of the community and nearby residents. Approving the permit, contradicts Connecticut's climate commitments under the Global Warming Standards Act... Solutions Act.
- I echo the concerns that increasing pressure in old infrastructure increases risks of explosion at all locations along the pipeline, but especially to the nearby middle school and residents.
- As a mother of a child with asthma, I'm deeply concerned about the health risks of increasing air pollutions near the school, especially. As stated, children are vulnerable to air pollution, and exposing them to this pollution every day is unacceptable. I'm also the chair to the Southern Connecticut chapter of the Climate Reality Project.
- And want to say that methane is leaking from the existing compressor stations right now. You can see with cameras the pollution pouring out of them.
- Adding more compressor stations means adding more seals, valves, vents for more leaks. In the presentation, Iroquois cited vent recovery systems to collect and reuse leaked gas as part of their pollution reduction effort, but that sounds as problematic to me as Iroquois self-reporting their own emissions data.
- Methane contributes 80 times more powerfully to global temperature rising than carbon dioxide. If the global temperature rises more than 1.5 degrees above pre-industrial levels, we'll go from damaging the planet with pollution to destabilizing the planetary systems that we rely on for food, water, and safety.
- Methane in this pipeline acts as an accelerator to rising global temperatures.
- There are enough concerns that this permit deserves an adjudicatory hearing. Thanks.

O40

Sara-Jo Banks

02:33:29

Thank you.

- Good evening, my name is Sarah Jo Banks, and I live next to the Wiskoneer Middle School, so about 2,000 feet from the existing compressor station.
- I believe that tonight we can all agree that we've heard so many informed and caring citizens that are currently and will be affected by this expansion.
- I have continued to edit my testimony as each speaker made points that, honestly, I don't know if I could have said better. Both residents from Connecticut and New York have given numerous valid reasons why this application should be denied, and at the very least, allow for a judicatory hearing.

- For Deep to deny us that hearing, they are not working to protect Connecticut residents and silencing our voices.
- Again, tonight we have heard about the questionably... er, tonight we have heard from many speakers, and we've heard about the questionably... the questionable aged infrastructure that they want to put more pressure on. We've heard about the lack of... of the need for this expansion.
- We've heard about the constant reoccurrence of incidences at these types of stations. We've heard about the proven health hazards connected to these stations, and that the lack... and the lack of air quality and ground testing that's being done.
- I say it again, we've heard so many great, sound arguments against this permit tonight. So at this point, the only thing that I can really add is my personal connection. As I stated, I live 2,000 feet from the station.
- On my property, I have a hobby farm, where I grow some of my food, and we eat, and my family spends most of our time tending and enjoying the outsides in our garden.
- We breathe the air every day, both inside and outside of our home.
- And we have well water that is susceptible to ground contamination.
- We can hear when the stacks blow out.
- With the lack of comprehensive air quality testing and ground testing, what security do I have that we are actually safe now, let alone with the added toxins from this expansion?
- I will add a personal side note that I recently was diagnosed with a very rare and aggressive form of cancer.
- I'm not saying this is connected to the known toxins currently being omitted.
- I'm not a doctor or expert in any way.
- However, there's been no true concern shown by requiring any experts or having these tests done to see if there are contaminants affecting or harming people.
- What future can I hope for for my 18-month-old son's health?
- I urge DEEP to deny this permit, and at the very least, do your job of protecting and giving a voice to Connecticut residents by granting the adjudicatory hearing. Thank you.

O41

Amanda Sutor

02:36:30

Alright, yes, I'm ready.

- My name is Amanda Suter, and, I'm a Brookfield mom.
- As of next year, I will have two children at, the Wiskin Air Middle School.
- And I'd like to urge Jeep to protect my children, their friends, the teachers, Everyone else...
- That is affected now, and who will be affected in the future, and correct their mistake by denying this premise. Thank you.

O42

Anthony Cappiello

02:37:17

Thank you. My name is Anthony Capiello, a long-time resident of Brookfield, retired mechanical engineer, current member and former chairman of our Town Conservation Commission.

- Thank you for the opportunity to speak this evening on this matter, which has become a major concern to my community.
- For the sake of brevity, I will limit my comments, since so many previous speakers this evening have very effectively expressed a number of valid concerns and questions which I share.
- **In particular, I urge the Connecticut Department of Energy and Environmental Protection to reconsider its current posture and further address, as a minimum, the following considerations. The treatment of this proposal as a major expansion, including an editorial hearing in the review process.**
- The use of electric motor drives, and the implementation of continuous monitoring of air quality. That's all I have to say. Thank you very much for your time and attention.

Appendix A
List of Commenters

Written Comments contained within zip file in folder named as:

1. Written Comments received prior to Tentative Determination (P1 – P20)
2. Tentative Determination Comments (1-230)
3. Written Comments received through January 6, 2026 (H1 - H15)
4. Written Hearing Comments received through January 15, 2026 (H16 – H189)