



Enbridge
915 North Eldridge Parkway
Suite 1100
Houston, Texas 77079

May 9, 2024

Seng Phouthakoun
State of Connecticut Department of Energy and Environmental Protection (CTDEEP)
Bureau of Air Management
Enforcement Division
79 Elm Street
Hartford, CT 06106-5127

*RE: Request for Order to Limit Premise-Wide Actual Volatile Organic Compounds for
Algonquin Gas Transmission, LLC – Oxford Compressor Station*

Dear Mr. Phouthakoun:

The Oxford Compressor Station (CS) is located in New Haven County which was reclassified from serious to severe ozone nonattainment by the EPA on November 7, 2022. As a result, the Oxford CS became subject to VOC RACT pursuant to §RCSA 22a-174-32(b)(1)(B) on November 13, 2023 when CTDEEP revised the regulatory definition of the ozone nonattainment areas for Connecticut. Per §RCSA 22a-174-32(d)(C) compliance must be demonstrated no later than six months after becoming subject to VOC RACT, resulting in a compliance deadline of May 13, 2024.

Pursuant to §RCSA 22a-174-32(c)(1) the commissioner may issue an individual permit, general permit, or order limiting VOC emissions in lieu of requiring RACT measures so long as the owner demonstrates that historical actual emissions of VOCs did not exceed twenty-five (25) tons, in every calendar year after December 31, 1995. Therefore, Algonquin is requesting a federally enforceable consent order limiting premise-wide actual emissions of VOCs to twenty-five (25) tons per calendar year for the Oxford CS to comply with VOC RACT.

A summary of the premise-wide actual annual VOC emissions reported in the facility's annual emission statements are presented in Table 1 below. Algonquin was first required to submit annual emission statements for VOCs upon issuance of the facility Title V permit in 2019. Per your request, annual emission statements are provided as Attachment 1, which demonstrate actual premise-wide VOC emissions did not exceed 25 tons per calendar year since 2019.

Table 1. Oxford CS Historical
Premise-Wide VOC Emissions

Year	Premise-Wide Actual VOC Emissions (tons)
2019	13.47
2020	12.07
2021	12.82
2022	12.49
2023	12.70

Algonquin understands CTDEEP plans to issue a federally enforceable “capping” consent order. In the event the facility Title V permit is updated to reflect the order, Algonquin proposes the following conditional language.

Section III: Applicable Requirements and Compliance Demonstration

C. PREMISES-WIDE GENERAL REQUIREMENTS

22. RCSA 22a-174-32 – Reasonably Available Control Technology (RACT) for Volatile Organic Compounds

a. Limitation or Restriction

Premise-wide VOC emissions shall not exceed 25 tons per calendar year.
[RCSA §22a-174-32(c)]

b. Recordkeeping Requirements

The Permittee shall maintain records sufficient to determine compliance with the limitation or restriction in Section III.C.22.a of this Title V permit. [RCSA §22a-174-32(c)(3)]

A signed certification statement is provided as Attachment 2. If there are any questions concerning this application, please contact Jimmy Ryan of TRC at (510) 666-5146 or by email at jtryan@trccompanies.com.

Sincerely,



Erika St. Pierre

Senior Engineer - Environment

Attachments

Attachment 1 – Annual Emission Statements

DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
Emission Statement



Town: 144 **Premises:** 18 **Client:** 8820 **Reporting Period:** 2019
Site Name: ALGONQUIN GAS TRANSMISSION LLC **Title V Number:** 32 ■

Site Address

Address Line 1: 40 WOODRUFF HILL RD

Address Line 2:

City: OXFORD **State:** Connecticut **ZIP Code:** 06478

GPLPE: ■ **Latitude/Longitude:** 41.484973, -73.121794

SIC: (4922) NATURAL GAS TRANSMISSION **Subject to 3c:** No

NAICS Sector:

NAICS Sub-Sector:

Company Contact

First Name: Phillip **Last Name:** Wiedenfeld

Company: Algonquin Gas Transmission **Type:** Primary Site Contact **Title:** Sr. Engineer

Address Line 1: PO Box 1642

Address Line 2:

City: Houston **State:** Texas **ZIP Code:** 77251 - 1642

Telephone: (713) 627-5400 **Ext:** **Fax:** (713) 989-8347

Mobile: (713) 627-6608 **Email:** Phillip.Wiedenfeld@enbridge.com

Owner

Name: Enbridge

Address Line 1: P.O. Box 1642

Address Line 2:

City: Houston **State:** Texas **ZIP Code:** 77251

Telephone: (713) 627-4790

■ = Data was Modified. ▲ = Modification request was Acknowledged.

DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
Emission Statement



Town: 144 Premises: 18 Client: 8820 Reporting Period: 2019

Site Emissions

Criteria Air Pollutants (CAP)

Pollutant	Actual Emission Amt (tons/yr)
Volatile organic compounds (VOC)	13.47288956
Nitrogen oxides (NOx)	13.88459769
Carbon monoxide (CO)	51.31953523
PM10, primary	3.05163804
PM10, filterable	0.84617267
PM2.5, primary	3.05163804
PM2.5, filterable	0.84617267
PM, condensable	2.20477545
Sulfur Dioxide (SO2)	6.66159133
Lead	0.0
Ammonia	0.0

Photo Chemically Reactive VOC HAPS

Pollutant	Actual Emission Amt (lbs/yr)
1,3-Butadiene	2.150897903726
Acetaldehyde	195.98046925408
Acrolein	32.015406497588
Benzene	60.030376701852
Ethylbenzene	160.079429285142
Formaldehyde	3450.722147733368
Isomers of xylene	320.158840532874
Phenol	11.796666942564
Propylene oxide	145.072713447244
Toluene	650.323036872386

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DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
Emission Statement



Town: 144 **Premises:** 18 **Client:** 8820 **Reporting Period:** 2020
Site Name: ALGONQUIN GAS TRANSMISSION LLC **Title V Number:** 32

Site Address

Address Line 1: 40 WOODRUFF HILL RD

Address Line 2:

City: OXFORD **State:** Connecticut **ZIP Code:** 06478

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Name: Enbridge

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Telephone: (713) 627-4790

DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
Emission Statement



Town: 144 Premises: 18 Client: 8820 Reporting Period: 2020

Site Emissions

Criteria Air Pollutants (CAP)

Pollutant	Actual Emission Amt (tons/yr)
Volatile organic compounds (VOC)	12.0730823
Nitrogen oxides (NOx)	14.47121637
Carbon monoxide (CO)	41.07171712
PM10, primary	2.52250416
PM10, filterable	0.70283852
PM2.5, primary	2.52250416
PM2.5, filterable	0.70283852
PM, condensable	1.81965168
Sulfur Dioxide (SO2)	5.45731847
Lead	0.0
Ammonia	0.0

Photo Chemically Reactive VOC HAPS

Pollutant	Actual Emission Amt (lbs/yr)
1,3-Butadiene	1.69993227132
Acetaldehyde	155.852011480702
Acrolein	25.303155649336
Benzene	47.435768338766
Ethylbenzene	126.495383788952
Formaldehyde	2751.550359830194
Isomers of xylene	252.990982307166
Phenol	9.669272
Propylene oxide	114.636587025784
Toluene	513.888097014374

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DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
Emission Statement



Town: 144 **Premises:** 18 **Client:** 8820 **Reporting Period:** 2021
Site Name: ALGONQUIN GAS TRANSMISSION LLC **Title V Number:** 32

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Telephone: (713) 627-4790

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DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
Emission Statement



Town: 144 Premises: 18 Client: 8820 Reporting Period: 2021

Site Emissions

Criteria Air Pollutants (CAP)

Pollutant	Actual Emission Amt (tons/yr)
Volatile organic compounds (VOC)	12.81598841
Nitrogen oxides (NOx)	16.54796026
Carbon monoxide (CO)	53.66688908
PM10, primary	3.07447235
PM10, filterable	0.8516726
PM2.5, primary	3.07447235
PM2.5, filterable	0.8516726
PM, condensable	2.22279872
Sulfur Dioxide (SO2)	6.71838123
Lead	0.0
Ammonia	0.0

Photo Chemically Reactive VOC HAPS

Pollutant	Actual Emission Amt (lbs/yr)
1,3-Butadiene	2.112276728024
Acetaldehyde	193.036485947592
Acrolein	31.438498890612
Benzene	58.947193346052
Ethylbenzene	157.192525219418
Formaldehyde	3404.77020115742
Isomers of xylene	314.385030496248
Phenol	11.9441722
Propylene oxide	142.455735246628
Toluene	638.594643501532

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DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
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Town: 144 **Premises:** 18 **Client:** 8820 **Reporting Period:** 2022
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Mobile: (713) 627-6608 **Email:** Phillip.Wiedenfeld@enbridge.com

Owner

Name: Enbridge

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Address Line 2:

City: Houston **State:** Texas **ZIP Code:** 77251

Telephone: (713) 627-4790

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DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
Emission Statement



Town: 144 Premises: 18 Client: 8820 Reporting Period: 2022

Site Emissions

Criteria Air Pollutants (CAP)

Pollutant	Actual Emission Amt (tons/yr)
Volatile organic compounds (VOC)	12.49031165
Nitrogen oxides (NOx)	23.75512172
Carbon monoxide (CO)	44.71299243
PM10, primary	3.08275108
PM10, filterable	0.86404331
PM2.5, primary	3.08275108
PM2.5, filterable	0.86404331
PM, condensable	2.2187058
Sulfur Dioxide (SO2)	6.6754235
Lead	0.0
Ammonia	0.0

Photo Chemically Reactive VOC HAPS

Pollutant	Actual Emission Amt (lbs/yr)
1,3-Butadiene	1.981080869982
Acetaldehyde	181.905196988976
Acrolein	29.48582428131
Benzene	55.285926999976
Ethylbenzene	147.429143992076
Formaldehyde	3213.933014861576
Isomers of xylene	294.858273933254
Phenol	11.8655211
Propylene oxide	133.607667836096
Toluene	598.930902902242

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DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
Emission Statement



Town: 144 **Premises:** 18 **Client:** 8820 **Reporting Period:** 2023
Site Name: ALGONQUIN GAS TRANSMISSION LLC **Title V Number:** 32

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Address Line 2:

City: OXFORD **State:** Connecticut **ZIP Code:** 06478

GPLPE: **Latitude/Longitude:** 41.484973, -73.121794

SIC: (4922) NATURAL GAS TRANSMISSION **Subject to 3c:** No

NAICS Sector:

NAICS Sub-Sector:

Company Contact

First Name: Susann ■ **Last Name:** Brown ■
Company: Algonquin Gas Transmission **Type:** Primary Site Contact **Title:** Supervisor, Air Monitoring & Reporting ■
Address Line 1: 915 North Eldridge Parkway
Address Line 2:
City: Houston **State:** Texas **ZIP Code:** 77079 - 1642
Telephone: (908) 821-1825 ■ **Ext:** **Fax:** ■
Mobile: ■ **Email:** Susann.Brown@enbridge.com ■

Owner

Name: Enbridge
Address Line 1: P.O. Box 1642
Address Line 2:
City: Houston **State:** Texas **ZIP Code:** 77251
Telephone: (713) 627-4790

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DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
Emission Statement



Town: 144 Premises: 18 Client: 8820 Reporting Period: 2023

Site Emissions

Criteria Air Pollutants (CAP)

Pollutant	Actual Emission Amt (tons/yr)
Volatile organic compounds (VOC)	12.70270767
Nitrogen oxides (NOx)	22.79586456
Carbon monoxide (CO)	47.29136696
PM10, primary	3.34196894
PM10, filterable	0.93964145
PM2.5, primary	3.34196894
PM2.5, filterable	0.93964145
PM, condensable	2.4023268
Sulfur Dioxide (SO2)	7.22281429
Lead	0.0
Ammonia	0.0

Photo Chemically Reactive VOC HAPS

Pollutant	Actual Emission Amt (lbs/yr)
1,3-Butadiene	2.160929625718
Acetaldehyde	198.62470333918
Acrolein	32.162724283608
Benzene	60.305778674232
Ethylbenzene	160.81365034634
Formaldehyde	3510.46130239724
Isomers of xylene	321.625519813992
Phenol	12.84195679
Propylene oxide	145.737209800458
Toluene	653.303801114948

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Attachment 2 – Certification



Enbridge
915 N Eldridge Parkway
Suite 1100
Houston, Texas 77079

Certification

The document preparer, premises owner, and premises operator must all sign the following certification:

I have personally examined and am familiar with the information submitted in this submittal and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under § 22a-175 of the Connecticut General Statutes, under § 53a-157b of the Connecticut General Statutes, and in accordance with any other applicable statute.

Signature of Document Preparer Date

James Ryan

Name of Document Preparer (Please print)

Project Manager

Title of Document Preparer

Don Thompson Digitally signed by Don Thompson
Date: 2024.05.06 11:44:08 -04'00'

Signature of Owner Date

Don Thompson

Name of Owner (Please print)

Don Thompson Digitally signed by Don Thompson
Date: 2024.05.06 11:45:06 -04'00'

Signature of Operator Date

Don Thompson

Name of Operator (Please Print)