

CONNECTICUT DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT
Engineering Division

TO: Jaimeson Sinclair, Director
Application Nos.:
202003147, 202003148 (New Units)
202003146, 202003805 (Modified Units)
Date Received: 03/02/2020

FROM: James Grillo, APCE
Louis J. Corsino III, Supervising APCE

DATE: 07/22/2026

SUBJECT: Second Notice of Tentative Determination

Discussion:

On July 30, 2025, the Department issued a tentative determination (NTD) for two (2) new combustion turbine natural gas compressors (Permit Nos. 028-0029 and 028-0030) and two (2) modified combustion turbine natural gas compressors (Permit Nos. 028-0027 and 028-0028) to Iroquois Gas Transmissions System L.P. The public notice was published in the News-Times on July 31, 2025. On November 20, 2025, the Department published a public notice for a virtual public informational hearing which was held on January 8, 2026. The Department accepted public comments from the informational hearing until the close of business on January 15, 2026.

The Department reviewed all comments submitted by the public, which are addressed in a separate Response-to-Comments document. Between July 17 and July 22, 2026, the applicant submitted requests to increase the carbon monoxide (CO) emission limits in the July 2025 NTD permits, supporting justification for the requested increases, and minor corrections to statements in the July 2025 NTD permits. The applicant noted that the July 2025 NTD proposed permits do not represent anticipated emissions based on historical and anticipated runtime, startups, and shutdowns. The Applicant reiterated that during periods of startup and shutdown the oxidation catalyst does not effectively control CO emissions and asked to increase emissions to reflect historical and anticipated runtime, startups and shutdowns.

Specifically, the applicant has requested the following changes:

Permit Nos. 028-0029 and 028-0030

- Changed the NO_x and CO startup and shutdown emission limits from “lb/hr” to “lb/event”, along with the associated numerical value changes due to the units change, to match the values presented in the respective Solar Turbines Inc. Product Information Letters.
- Added to Part IV.I of the permits that CO low temperature emissions are based on Solar Turbines Inc., Product Information Letter No. 167, “Emissions in Non-SoLoNO_x Mode”, Revision 9, Table 1, dated 10/28/2025.
- The July 2025 NTD proposed permits stipulated that the CO startup and shutdown emissions were based on Solar Turbines Inc., Product Information Letter No. 170, “Emission Estimates at Start-up, Shutdown, and Commissioning for SoLoNO_x Combustion Products”, Revision 9, Table 2, 9/10/18 and oxidation catalyst manufacturer’s guarantee. This was updated to clarify that the CO startup and shutdown emissions are derived from *Table 4* of that Product Information Letter.
- The annual CO emissions for each turbine were updated from 1.65 tons per year to 4.65 tons per year to account for the corrections made to startup and shutdown emissions.

Permit Nos. 028-0027 and 028-0028

- Changed the NOx and CO startup and shutdown emission limits from “lb/hr” to “lb/event”, along with the associated numerical value changes due to the units change, to match the values presented in the respective Solar Turbines Inc. Product Information Letter No. 170 Rev. 5
- Added to Part IV.H of the permits that CO low temperature emissions are based on Solar Turbines Inc., Product Information Letter No. 167, “Emissions in Non-SoLoNOx Mode”, Revision 9, Table 2, dated 10/28/2025.
- The annual CO emissions after the installation of the oxidation catalyst (Phase 2) were updated from 0.7 tons per year to 3.7 tons per year for P028-0027 and 0.9 tons per year to 3.9 tons per year for P028-0028 to account for the corrections made to startup and shutdown emissions.

The Department also requested that the applicant revise the performance curves used to determine maximum rated capacity for stack testing as it appeared that the equations in the 2025 NTD used the lower heating value (LHV) rather than the higher heating value (HHV) used to calculate emissions in the permit review.

Recommendation:

Based on the above information and the information in the Response-to-Comments document, it is recommended that the proposed new and modified permits be issued to Iroquois Gas Transmission system L.P.

/s/James Grillo
James Grillo, APCE

7/23/2026
Date

Approvals:

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

7/23/2026
Date

ATTACHMENTS