



SIERRA CLUB

Connecticut Chapter
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September 16, 2025

Mr. James Grillo
Bureau of Air Management
Connecticut Department of Energy & Environmental Protection
79 Elm Street
Hartford, CT 06106-5127
Via electronic mail: james.grillo@ct.gov.

Dear Mr. Grillo,

On behalf of the Sierra Club and our more than 30,000 members and supporters in Connecticut, thank you for the opportunity to provide public comment in opposition to DEEP's Notice of Tentative Determination to Approve Point Source New Source Review Permit Applications for Iroquois Gas Transmission System, L.P. Application Nos. 202003147 & 202003148; 202003146 & 202003805 (Modified Units) in Brookfield, Connecticut. There are numerous reasons, enumerated below, that Sierra Club Connecticut opposes these permits, and urges DEEP to reverse its tentative determination.

1. No need and no benefit for Connecticut, just risk

Iroquois's "Expansion by Compression" project will increase the amount of gas transported through Connecticut to New York City by 125 million cubic feet per day.¹ It involves expanded compression and gas cooling at two compressor stations in New York and two compressor stations in Connecticut, in Brookfield and Milford. The methane gas will not be used in Connecticut, and is intended for New York. Yet, Connecticut is assuming the health, safety, climate and air pollution risks associated with the operation of two compressor stations on the pipeline.

2. Increased carbon emissions

Connecticut's Global Warming Solutions Act, Section 22a-200a of the General Statutes, updated by the legislature in 2025, mandates that the state reduce the level of emissions of greenhouse gases by 45% below 2001 level by 2030, 65% below 2001 levels by 2040, and that, by 2050, the state be at an economy-wide net-zero level, if direct and indirect GHG emissions are at least 80% below the 2001 level. As the state agency charged with the implementation of the Clean Air Act in Connecticut, Connecticut DEEP has a key role to play in meeting this mandate.

According to DEEP's most recent Greenhouse Gas Inventory, greenhouse gas emissions in Connecticut are not on track to meet the 2030 mandate.² The Inventory shows that in 2023, total emissions increased 1.5% from 2022 levels. The Inventory states that "While the state met its 2020 goal, deeper cuts to emissions must be made to reach the 2030 target of 45% below 2001 levels by 2030."

¹ <https://www.iroquois.com/operations/projects/exc-project/>

² https://portal.ct.gov/-/media/deep/climatechange/1990-2023-ghg-inventory/deep_ghg_report_1990-2023-final.pdf



If issued, these permits will increase greenhouse gas emissions in Connecticut by over 80,000 metric tons of CO₂e emissions per year. These additional emissions will impede DEEP's ability to achieve the mandated emission reductions of the GWSA.

3. Increased air pollution levels in a severe ozone nonattainment zone, less than 1,900 feet from Brookfield's only middle school.

Brookfield is located in Fairfield county which is designated a severe ozone nonattainment zone. Severe ozone nonattainment zones experience high levels of ground-level ozone, also known as smog. Smog causes chronic respiratory illnesses resulting in asthma attacks, bronchitis, and premature death.

The Brookfield compressor expansion will emit hazardous pollutants, including Volatile Organic Compounds (VOCs) such as benzene, toluene, ethylbenzene, and xylene; formaldehyde, a known human carcinogen; nitrogen oxides (NO_x) and particulate matter (PM_{2.5}, PM₁₀), which exacerbate asthma, cardiovascular disease, and respiratory illness; and carbon monoxide and sulfur dioxide, contributing to both acute and chronic health stressors.

Children, seniors, pregnant women, and people with pre-existing conditions are all at higher health risk from exposure to dangerous emissions. Whisconier Middle School enrolls 790 fifth through eighth grade students less than 1,900 feet from the facility. Of the 2,000 residents who live in the 800 neighboring residences within a mile of the facility, 674 are children under 18 and 293 are over 65.³

DEEP is the agency responsible for meeting the 2008 National Ambient Air Quality Standards (NAAQS or standards) for ozone. The recent change to severe nonattainment was a result of failure to attain the NAAQS by the attainment date of July 20, 2021.

The air quality in Fairfield County is at stake.

4. The facility should be considered a Major Modification

The potential to emit NO_x at the facility is 63.99 tons per year (tpy)⁴ and the baseline is 13.71 tpy.⁵ The difference puts the proposal in the Major Modification category. While DEEP places limits on NO_x emissions, those limits cannot be used to determine the potential to emit, which the tentative permit does.

5. The permit conditions do not ensure that Iroquois does not exceed NO_x emission limits

DEEP's tentative permit contains terms that the proposed new methane gas turbines be subject to NO_x emission limits. The permit would limit allowable NO_x emissions to 24.9 tpy – within one-half of percent of the allowable threshold of 25 tpy.

³<https://www.sierraclub.org/sites/default/files/2024-08/Brookfield%20Compressor%20Final%20Report%2007.24.24%20.pdf>

⁴Iroquois, Attachment H: Major Modification Determination Form, Part III: Total Project Emissions Increase.

⁵DEEP, NSR Engineering Evaluation at 14.



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The limit on emissions and the restrictions in the tentative permit are not protective if DEEP does not actively monitor and enforce it. As it stands, Iroquois would self-monitor its emissions. This allows Iroquois to test emissions at times of its choosing, and to select only the tests that meet the requirement of the permit.

The tentative permit places additional restrictions on the amount of time that the turbines can run, and at what load levels. These additional restrictions are not sufficient to ensure that Iroquois does not exceed NOx limits.

Finally, DEEP's tentative determination does not incorporate Best Available Control Technology (BACT), as required by Conn. Agencies Regs. § 22a-174-3a(j).

The attached memo on the permits from Bruce Buckheit provides further detail on the tentative determination and these issues.

For these reasons, it is imperative that the permit be rejected.

Sincerely,

Samantha Dynowski, State Director
Sierra Club Connecticut

Attachments:

- Report: Potential Impacts of the Expanded Iroquois Compressor Station in Brookfield, CT
- Letter to DEEP April 16, 2025, Evaluation of permit Terms for the expansion of the Brookfield Compressor Station, Application Nos. 202003147 and 202003148
- Memo: September 16, 2025, Review of Tentative Permit Decision for the Brookfield Compressor Station Expansion