Iroquois
GAS TRANSMISSION SYSTEM
IROQUOIS PIPELINE OPERATING COMPANY, OPERATOR

ONE CORPORATE DRIVE, SUITE 600
SHELTON, CT 06484-6211
TEL: (203) 925-7200
FAX: (203) 929-9501
www.iroquois.com

May 14, 2021

New York State Department of Environmental Conservation
Division of Environmental Permits
625 Broadway
Albany, NY 12233-1750
Attention: Karen M. Gaidasz, Offshore Wind and Hydroelectric Section Chief

Re: Iroquois Gas Transmission System, LP
Enhancement By Compression (ExC) Project
Air State Facility Permit ID Nos. 3-1326-00211 and 4-1922-00049

Dear Ms. Gaidasz:

Enclosed please find Iroquois Gas Transmission System, L.P.'s responses to Questions 4 through 6 of the New York State Department of Environmental Conservation's March 5, 2021 Request for Additional Information related to the above-referenced Air State Facility permit Applications for the Enhancement by Compression ("ExC") Project.

Feel free to contact me if you have any questions or require additional information.

IROQUOIS GAS TRANSMISSION SYSTEM, L.P.
By its Agent
Iroquois Pipeline Operating Company

By: _____
Name: Michael Kinik
Title: Director, Engineering Services

Response to NYSDEC March 5, 2021 Request for Additional Information
Iroquois Gas Transmission System, LP
Enhancement By Compression (ExC) Project
Air State Facility Permit ID Nos. 3-1326-00211 and 4-1922-00049

Below are Iroquois Gas Transmission System, L.P.'s ("Iroquois") responses to Question Nos 4 through 6 of New York State Department of Environmental Conservation's ("DEC") March 5, 2021 Requests for Additional Information ("RFAI")[1] related to Iroquois' applications for modifications of the Air State Facility Permits (the "Applications")[2] for Iroquois' Athens Compressor Station (DEC ID No. 4-1922-00049) and Dover Compressor Station (DEC ID No. 3-1326-00211) related to the proposed Enhancement by Compression Project (the "ExC Project" or the "Project").

For convenience, set forth below are Question Nos. 4 through 6 of the RFAI followed by Iroquois' response.

Question No. 4:

The emissions calculations state that the emissions are emission rate potential numbers (ERPs) based on uncontrolled firing of the equipment. There is no basis for these numbers. Iroquois must provide the following emission tables instead of what was submitted (Note: NYSDEC staff found discrepancies in the emission totals and these tables are intended to clarify these discrepancies):

I. A table with the current potential to emit of the existing sources at the facility (controlled, if there are controls) with any permitted restrictions listed (e.g., hours per year of operation or fuel amount limits).
II. A table (i.e., project emissions summary table) with the potentials to emit for all the new sources (based on any proposed operational or time restrictions).
III. A table with the total facility potential to emit (this includes the existing source emissions plus the new source emissions).

Response:

Three emission tables (Tables 1-3 listed below) are provided with this response for each of the Applications. Each table quantifies potential to emit from existing sources, new sources, and total combined post-Project existing (as modified) and new sources. The tables identify any operational restrictions and controls.

[1] DEC sent one RFAI to Iroquois for each of the Air State Facility Permit Applications. Since the RFAI questions were identical for both Applications, this document includes Iroquois' response to both RFAI. Iroquois is continuing to evaluate RFAI Questions Nos. 1 through 3.
[2] The Applications, as supplemented, and this response have been filed with DEC without prejudice to any rights that Iroquois now has, may have, or which it seeks to assert in the future under the Natural Gas Act (15 U.S.C. § 717 et seq.), all of which are hereby expressly reserved.

- Table 1 – Potential to Emit Tons per Year
- Table 2 – Potential to Emit Pounds per Year
- Table 3 – Potential to Emit Pounds per Hour

Some of the potential to emit values and some of the emission rate potential values have been updated in the tables and on the associated air permit application forms. Values revised on the application forms are identified with adjacent red markings.

The revised application forms and tables for the Athens Compressor Station and Dover Compressor Station are attached to this response as Attachment A and Attachment B, respectively.

Question No. 5:

The ASF application states that the heat content of the fuel is required to meet 1032 Btu/scf heat content as per the New Source Performance Standards (NSPS) Subpart KKKK requirements. However, there are multiple occurrences in the application and emission calculations that cite a fuel heat content of 1016 Btu/scf as well as 1031.7 Btu/scf heat content. It is NYSDEC staff's assumption that the natural gas coming into the station will have the same heat content when burned in any of the emission sources at the facility (both new and existing). Therefore, one heat content value should be used for all the emissions calculations. Please note that while the new turbine may be the only source that has to meet the NSPS requirement of a minimum heat content, all of the potential emissions from the entire facility must be calculated using this minimum heat content of 1032 Btu/scf.

Response:

Iroquois adjusted its natural gas fuel composition for its existing sources to match that of its new sources (i.e., 1,031.7 Btu/scf). In addition to the fuel's heat content, the fuel's volatile organic compound and sulfur contents are now also uniform for all sources. Seven of the application form pages have been amended as a result of the adjustment to those values and are attached with this response. Red markings have been added to the application forms to identify revised emissions values. If DEC would like the remainder of the application package included with the amended pages, Iroquois will provide that upon request.

The New Source Performance Standards applicable to Iroquois' proposed natural gas combustion turbines do not include a minimum or maximum fuel heat content limit or threshold. Rather, Iroquois complies by meeting a sulfur dioxide emissions limit. The statements in the permit application Section III, "Facility Compliance Certification", "Compliance Activity Description", on application package Page 5, and in Section IV, "Emission Unit Compliance Certification", "Compliance Activity Description", on Page 12, have been revised and clarified to read as follows.

Iroquois will comply with its Federal Energy Regulatory Commission natural gas tariff delivery point sulfur content limit (currently 1.25 gains per 100 Scf) at the compressor station. As a result, the turbines will not burn fuel emitting potential sulfur emissions in excess of the New Source Performance Standards (40 CFR Subpart KKKK) limit of 0.06 pounds of sulfur dioxide per million Btus of fuel heat input, which is equivalent to 21 grains of sulfur per 100 Scf.

Question No. 6:

The application does not contain a map showing the locations of Potential Environmental Justice Areas (PEJAs) within the vicinity of the ExC Project. Please provide a project map which has an overlay of New York PEJAs.

Response:

Attachment C to this response includes figures showing the locations of the Athens Compressor Station, Dover Compressor Station and Potential Environmental Justice Areas.

Dated: May 14, 2021

ATTACHMENT A

Athens Compressor Station Revised Application Forms and Potential to Emit Tables

New York State Department of Environmental Conservation
Air Permit Application

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

DEC ID	Application ID	Application Type
4-1922-00049	-- /	× State Facility Title V

Section I - Certification

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information required to complete this application, I believe the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Responsible Official: Paul R. Amato	Title: VP Engineering, Operations and EH+S
Signature:	Date: 5/13/2021

Professional Engineer Certification

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments as they pertain to the practice of engineering. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Professional Engineer: Ronald E. Schroeder	NYS License No. 073452
Signature:	Date: May 4, 2021

STATE OF NEW YORK 073452 LICENSED PROFESSIONAL ENGINEER

Section II - Identification Information

Type of Permit Action Requested

New Renewal Significant Modification Administrative Amendment × Minor Modification

Application for the construction of a new facility × Application involves the construction of new emission unit(s)

Facility Information

Name: Athens Compressor Station

Location Address: 915 Schoharie Turnpike

City / Town / ✓ Village: Athens Zip: 12015

Owner/Firm Information

Business Taxpayer ID: 061285387

Name: Iroquois Pipeline Operating Company

Street Address: One Corporate Drive, Suite 600

City: Shelton State/Province: CT Country: USA Zip: 06484

Owner Classification: Federal State Municipal × Corporation/Partnership Individual

Owner/Firm Contact Information

Name: James T. Barnes Phone: 203-944-7023

E-mail Address: tim_barnes@iroquois.com Fax: 203-925-7213

Affiliation: Company Title: Manager, Environmental Services

Street Address: One Corporate Drive, Suite 600

City: Shelton State/Province: CT Country: USA Zip: 06484

Facility Contact Information

Name: James T. Barnes Phone: 203-944-7023

E-mail Address: tim_barnes@iroquois.com Fax: 203-925-7213

Affiliation: Company Title: Manager, Environmental Services

Street Address: One Corporate Drive, Suite 600

City: Shelton State/Province: CT Country: USA Zip: 06484

New York State Department of Environmental Conservation
Air Permit Application

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Facility Compliance Certification

☐ Continuation Sheet(s)

Rule Citation

Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
40	CFR	60	KKKK	60.4330	(a)	(a)(2)			

× Applicable Federal Requirement / State Only Requirement	Capping	CAS Number	Contaminant Name
		7446-09-5	Sulfur Dioxide

Monitoring Information

Work Practice Involving Specific Operations | Ambient Air Monitoring | × Record Keeping/Maintenance Procedures

Compliance Activity Description

Iroquois will comply with its Federal Energy Regulatory Commission natural gas tariff delivery point sulfur content limit (currently 1.25 gains per 100 Scf) at the compressor station. As a result, the turbines will not burn fuel emitting potential sulfur emissions in excess of the New Source Performance Standards (40 CFR Subpart KKKK) limit of 0.06 pounds of sulfur dioxide per million Btus of fuel heat input, which is equivalent to 21 grains of sulfur per 100 Scf.

Work Practice Type Code	Process Material Code	Process Material Description	Reference Test Method
04	32	natural gas fuel	ISO 19739

Monitored Parameter Code	Monitored Parameter Description	Manufacturer's Name/Model Number
32	fuel sulfur content	Galvanic Applied Science, Model: TS903

Limit Upper	Limit Lower	Limit Units Code	Limit Units Description
1.25	0	346	grains sulfur per 100 standard cubic feet

Averaging Method Code	Averaging Method Description	Monitoring Frequency Code	Monitoring Frequency Description	Reporting Requirements Code	Reporting Requirements Description
01	maximum not be exceeded	09	annually	10	upon request

Facility Emissions Summary

☐ Continuation Sheet(s)

CAS Number	Contaminant Name	Potential to Emit (tons/yr)	Actual Emissions (pounds/yr)
0NY075 - 00 - 5	PM-10	20.6	8,336
0NY750 - 02 - 5	PM-2.5	20.6	8,336
007446 - 09 - 5	Sulfur Dioxide	1.2	208
0NY210 - 00 - 0	Oxides of Nitrogen	56.8	18,347
000630 - 08 - 0	Carbon Monoxide	49.6	2,586
007439 - 92 - 1	Lead (elemental)	0.0	0.0
0NY998 - 00 - 0	Total Volatile Organic Compounds	1.5	2,266
0NY100 - 00 - 0	Total Hazardous Air Pollutants	0.9	235
0NY750 - 00 - 0	Carbon Dioxide Equivalents	93,157	33,920,880

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Section IV - Emission Unit Information

Emission Unit Description ☐ Continuation Sheet(s)

Emission Unit: 3-00001

The entire natural gas pipeline compressor station is the emission unit. It includes a single existing, natural gas-fired combustion turbine and compression facilities for delivery to downstream customers. The proposed project would add a second approximately 12,000 maximum horsepower (HP) rated simple-cycle low NOx natural gas fueled combustion turbine with an oxidation catalyst to drive a natural gas pipeline compressor.
The station also includes an existing permit-exempt 750 HP reciprocating, natural gas-fired, emergency generator, to which an oxidation catalyst will be added, and two other small natural gas combustion sources (heaters) that are exempt from air permitting (i.e., less than 10 million Btus/Hour fuel input rating).

Building Information ☐ Continuation Sheet(s)

Building ID	Building Name	Length (ft)	Width (ft)	Orientation
6	Compressor Building A-1	72	50	310
26	Compressor Building A-2	105	64	30

Emission Unit Emissions Summary ☒ Continuation Sheet(s)

Emission Unit: 3-00001

CAS Number	Contaminant Name			
0NY210-00-0	nitrogen oxides			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
113,501	16.3	113,501	11.2	18,347
CAS Number	Contaminant Name			
00630-08-0	carbon monoxide			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
125,453	12.0	99,223	3.7	2,586
CAS Number	Contaminant Name			
0NY750-02-5	particulate matter (PM2.5)			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
41,102	4.8	41,102	3.9	8,336
CAS Number	Contaminant Name			
0NY998-00-0	volatile organic compounds			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
9,514	0.4	3,053	0.6	2,266

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Air Permit Application Form

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Section IV - Emission Unit Information

Emission Unit 3-00001	**Emission Unit Emissions Summary (continuation)**			
CAS No.	Contaminant Name			
007446-09-5	sulfur dioxide			
ERP (lbs/yr)	PTE Emissions		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
2,403	0.3	2,403	0.1	208
CAS No.	Contaminant Name			
0NY100-00-0	combined hazardous air pollutants			
ERP (lbs/yr)	PTE Emissions		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
1,799	0.6	1,799	0.5	235
CAS No.	Contaminant Name			
0NY750-00-0	carbon dioxide equivalents			
ERP (lbs/yr)	PTE Emissions		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
194,890,137	21,962	186,314,204	12,608	33,920,880
CAS No.	Contaminant Name			
ERP (lbs/yr)	PTE Emissions		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
CAS No.	Contaminant Name			
ERP (lbs/yr)	PTE Emissions		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
CAS No.	Contaminant Name			
ERP (lbs/yr)	PTE Emissions		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
CAS No.	Contaminant Name			
ERP (lbs/yr)	PTE Emissions		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)

Continuation Sheet 2 of 2

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Section IV - Emission Unit Information

Process Emissions Summary (continuation)

Emission Unit	3-0001					Process	001		
CAS No.	Contaminant Name			% Throughput	% Capture	% Control	ERP (lbs/hr)	ERP How Determined	
0NY750 - 00 - 0	carbon dioxide equivalents			100	100	0	20,197	03	
PTE			Standard Units	PTE How Determined			Actual		
(lbs/hr)	(lbs/yr)	(standard units)					(lbs/hr)	(lbs/yr)	
20,285	177,696,000	NA	NA	03			9,844	24,502,946	

Emission Unit	3-0001					Process	001		
CAS No.	Contaminant Name			% Throughput	% Capture	% Control	ERP (lbs/hr)	ERP How Determined	
0NY998 - 00 - 0	volatile organic compounds			100	100	0	0.02	02	
PTE			Standard Units	PTE How Determined			Actual		
(lbs/hr)	(lbs/yr)	(standard units)					(lbs/hr)	(lbs/yr)	
0.02	152	NA	NA	02			0.16	1,213	

Emission Unit	3-0001					Process	001		
CAS No.	Contaminant Name			% Throughput	% Capture	% Control	ERP (lbs/hr)	ERP How Determined	
007446 - 09 - 5	sulfur dioxide			100	100	0	0.13	02	
PTE			Standard Units	PTE How Determined			Actual		
(lbs/hr)	(lbs/yr)	(standard units)					(lbs/hr)	(lbs/yr)	
0.27	2,361	0.06	7	02			0.07	190	

Emission Unit	3-0001					Process	001		
CAS No.	Contaminant Name			% Throughput	% Capture	% Control	ERP (lbs/hr)	ERP How Determined	
0NYI00 - 00 - 0	hazardous air pollutants			100	100	0	0.18	03	
PTE			Standard Units	PTE How Determined			Actual		
(lbs/hr)	(lbs/yr)	(standard units)					(lbs/hr)	(lbs/yr)	
0.18	1,572	NA	NA	03			0.09	229	

Emission Unit	-0001					Process			
CAS No.	Contaminant Name			% Throughput	% Capture	% Control	ERP (lbs/hr)	ERP How Determined	
PTE			Standard Units	PTE How Determined			Actual		
(lbs/hr)	(lbs/yr)	(standard units)					(lbs/hr)	(lbs/yr)	

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Emission Unit	Emission Point	Process	Emission Source	Emission Unit Applicable Federal Requirements								☐ Continuation Sheet(s)		
				Title	Type	Part	Subpart	Section	Subdiv.	Parag.	Subparag.	Cl.	Subcl.
00001	00001	001	00001	40	CFR	60	GG						
00001	00002	001	00002	40	CFR	60	KKKK						
00001	00001	001	00001	40	CFR	60	A						
00001	00002	001	00002	40	CFR	60	A						

Emission Unit	Emission Point	Process	Emission Source	Emission Unit State Only Requirements								☒ Continuation Sheet(s)		
				Title	Type	Part	Subpart	Section	Subdiv.	Parag.	Subparag.	Cl.	Subcl.
00001	00001	001	00001	6	NYCRR	200	200.2	safeguarding					
00001	00001	001	00001	6	NYCRR	200	200.3	false statements					
00001	00001	001	00001	6	NYCRR	200	200.4	severability					
00001	00001	001	00001	6	NYCRR	200	200.5	sealing					

Emission Unit Compliance Certification ☐ Continuation Sheet(s)

Rule Citation

Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
40	CFR	60	KKKK	60.4330	(a)	(a)(2)			

× Applicable Federal Requirement ☐ State Only Requirement ☐ Capping

Emission Unit	Emission Point	Process	Emission Source	CAS Number	Contaminant Name
00001	00002	001	00001	7446-09-05	sulfur dioxide

Monitoring Information

☐ Continuous Emission Monitoring
☐ Intermittent Emission Testing
☐ Ambient Air Monitoring
☐ Monitoring of a Process or Control Device Parameters as a Surrogate
☐ Work Practice Involving Specific Operations
× Record Keeping/Maintenance Procedures

Compliance Activity Description

Iroquois will comply with its Federal Energy Regulatory Commission natural gas tariff delivery point sulfur content limit (currently 1.25 gains per 100 Scf) at the compressor station. As a result, the turbines will not burn fuel emitting potential sulfur emissions in excess of the New Source Performance Standards (40 CFR Subpart KKKK) limit of 0.06 pounds of sulfur dioxide per million Btus of fuel heat input, which is equivalent to 21 grains of sulfur per 100 Scf.

Work Practice Type Code	Process Material		Reference Test Method
	Code	Description	
04	32	natural gas fuel	ISO 19739

Monitored Parameter		Manufacturer's Name/Model Number
Code	Description	
32	fuel sulfur content	Galvanic Applied Science, Model: TS903

Limit		Limit Units	
Upper	Lower	Code	Description
1.25	0	346	grains sulfur per 100 standard cubic feet

Averaging Method		Monitoring Frequency		Reporting Requirements	
Code	Description	Code	Description	Code	Description
01	maximum not to be exceeded	09	annually	10	upon request

New York State Department of Environmental Conservation
Air Permit Application

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

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Supporting Documentation and Attachments	
Required Supporting Documentation	Date of Document
× List of Exempt Activities (attach form)	2/28/20
× Plot Plan	2/14/20 and 11/5/20
× Process Flow Diagram	2/28/20
Methods Used to Determine Compliance (attach form)	
× Emissions Calculations	5/2021
Optional Supporting Documentation	Date of Document
× Air Quality Model	April and November 2020
Confidentiality Justification	
Ambient Air Quality Monitoring Plan or Reports	
Stack Test Protocol	
Stack Test Report	
Continuous Emissions Monitoring Plan	
Lowest Achievable Emission Rate (LAER) Demonstration	
Best Available Control Technology (BACT) Demonstration	
Reasonably Available Control Technology (RACT) Demonstration	
Toxic Impact Assessment (TIA)	
Environmental Rating Demonstration	
Operational Flexibility Protocol/Description of Alternate Operating Scenarios	
Title IV Permit Application	
Emission Reduction Credit (ERC) Quantification (attach form)	
Baseline Period Demonstration	
Use of Emission Reduction Credits (attach form)	
Analysis of Contemporaneous Emissions Increase/Decrease	
Other Supporting Documentation	Date of Document

Iroquois Pipeline Operating Company
Athens Compressor Station
ExC Project
Table 1 - Potential to Emit - Tons per Year

Existing Sources Potential to Emit (PTE) Tons/Year (TPY)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Turbine Unit A1 (no restrictions)	39.29	47.87	0.05	16.43	0.605	0.40	43,502
Existing Emergency Generator (500 hours per year **without** oxidation catalyst) EXEMPT	0.88	0.57	0.01	0.02	0.002	0.11	184
Existing Compressor Building Water Glycol Boiler (no restrictions) EXEMPT	2.84	0.60	0.11	0.34	0.017	0.00	3,069
Existing Office/Control Room Heat Furnace (no restrictions) EXEMPT	0.24	0.05	0.01	0.03	0.001	0.00	256
Existing Compressor Seal Gas Leakage (no restrictions or recovery) EXEMPT	0.00	0.00	1.48	0.00	0.00	0.00	3,351
Existing Domestic Water Heater (no restrictions) EXEMPT	0.06	0.01	0.002	0.01	0.000	0.00	63.9
Station Blowdowns and ESD (3-year average)	0.00	0.00	0.30	0.00	0.00	0.00	670
Total	**43.30**	**49.10**	**1.95**	**16.82**	**0.63**	**0.52**	**51,094**

New Sources Potential to Emit (PTE) Tons/Year (TPY)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Turbine Unit A2 (unlimited operation with oxidation catalyst)	13.45	0.91	0.03	3.73	0.58	0.38	45,346
Existing Emergency Generator (500 hours per year **with** oxidation catalyst) EXEMPT	0.88	0.17	0.01	0.02	0.002	0.11	184
Pipeline Liquids Tank (300 gallons per year) EXEMPT	0.00	0.00	1.00	0.00	0.00	0.00	0.0
Proposed Compressor Seal Gas Leakage (no restrictions but with 90% recovery) EXEMPT	0.00	0.00	0.15	0.00	0.00	0.00	335
Incremental Station Blowdowns and ESD (same 3-year average as existing station)	0.00	0.00	***0.03***	0.00	0.00	0.00	66.97
2023 Minor Modification	**14.33**	**1.08**	**1.21**	**3.75**	**0.58**	**0.50**	**45,932**
Major Source Thresholds	100	100	50	100	100	25	100,000
% Major Source	14.3%	1.1%	2.4%	3.7%	0.6%	2.0%	0.5

Total Facility Potential to Emit (PTE) Tons/Year (TPY)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Existing Station	43.30	49.10	1.95	16.82	0.63	0.52	51,094
Proposed Turbine	13.45	0.91	0.03	3.73	0.58	0.38	45,346
Changes due to adding CO oxidation catalyst to existing emergency engine	0.00	-0.40	0.00	0.00	0.00	0.00	0.00
Proposed pipeline liquids collection tank	0.00	0.00	1.00	0.00	0.00	0.00	0.00
Proposed compressor's seal gas emissions	0.00	0.00	0.15	0.00	0.00	0.00	335
Changes due to recovering existing facility blowdown and seal gas emissions	0.00	0.00	-1.60	0.00	0.00	0.00	-3,618
Combined Post-Project Emissions	**56.8**	**49.6**	**1.5**	**20.6**	**1.2**	**0.9**	**93,157**
Major Source Thresholds	100	100	50	100	100	25	100,000
% Major Source	56.8%	49.6%	3.1%	20.6%	1.2%	3.6%	93.2%

Iroquois Pipeline Operating Company
Athens Compressor Station
ExC Project
Table 2 - Potential to Emit - Pounds per Year

Existing Sources Potential to Emit (PTE) Pounds/Year (PPY)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Turbine Unit A1 (no restrictions)	78,577	95,747	96.74	32,857	1,210	806	87,004,000
Existing Emergency Generator (500 hours per year without oxidation catalyst) EXEMPT	1,764	1,146	11	32	5	227	367,664
Existing Compressor Building Water Glycol Boiler (no restrictions) EXEMPT	5,676	1,192	217	681	34.06	0.00	6,137,069
Existing Office/Control Room Heat Furnace (no restrictions) EXEMPT	473	99.33	18.11	56.76	2.84	0.00	511,422
Existing Compressor Seal Gas Leakage (no restrictions or recovery) EXEMPT	0.00	0.00	2,964	0.00	0.00	0.00	6,701,290
Existing Domestic Water Heater (no restrictions) EXEMPT	118	24.83	4.53	14.19	0.71	0.00	127,856
Station Blowdowns and ESD (3-year average)	0.00	0.00	592.34	0.00	0.00	0.00	1,339,353.52
Total	**86,608**	**98,209**	**3,903**	**33,641**	**1,252**	**1,033**	**102,188,654**

New Sources Potential to Emit (PTE) Pounds/Year (PPY)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Turbine Unit A2 (unlimited operation with oxidation catalyst)	26,893	1,816	55.03	7,461	1,151	767	90,692,000
Existing Emergency Generator (500 hours per year with oxidation catalyst) EXEMPT	1,764	344	10.58	31.70	4.63	227	367,664
Pipeline Liquids Tank (300 gallons per year) EXEMPT	0.00	0.00	1,999	0	0.00	0.00	0
Proposed Compressor Seal Gas Leakage (no restrictions but with 90% recovery) EXEMPT	0.00	0.00	296	0.00	0.00	0.00	670,129
Incremental Station Blowdowns and ESD (same 3-year average as existing station)	0.00	0.00	59.23	0.00	0.00	0.00	133,935
2023 Minor Modification	**28,657**	**2,160**	**2,420**	**7,493**	**1,156**	**993.8**	**91,863,728**

Total Facility Potential to Emit (PTE) Pounds/Year (PPY)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Existing Station	86,608	98,209	3,903	33,641	1,252	1,033	102,188,654
Proposed Turbine	26,893	1,816	55	7,461	1,151	767	90,692,000
Changes due to adding CO oxidation catalyst to existing emergency engine	0.00	-802	0.00	0.00	0.00	0.00	0.00
Proposed pipeline liquids collection tank	0.00	0.00	1,999	0.00	0.00	0.00	0.00
Proposed compressor's seal gas emissions	0.00	0.00	296	0.00	0.00	0.00	670,129
Changes due to recovering existing facility blowdown and seal gas emissions	0	0	-3,200	0	0	0	-7,236,579
Combined Post-Project Emissions	**113,501**	**99,223**	**3,053**	**41,102**	**2,403**	**1,799**	**186,314,204**

Iroquois Pipeline Operating Company
Athens Compressor Station
ExC Project
Table 3 - Potential to Emit - Pounds per Hour

Existing Sources Potential to Emit (PTE) Pounds/Hour (PPH)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Turbine Unit A1 (no restrictions)	8.97	10.93	0.01	3.75	0.14	0.09	9,932
Existing Emergency Generator (500 hours per year without oxidation catalyst) EXEMPT	3.53	2.29	0.02	0.06	0.01	0.45	735
Existing Compressor Building Water Glycol Boiler (no restrictions) EXEMPT	0.65	0.14	0.02	0.08	0.00	0.00	701
Existing Office/Control Room Heat Furnace (no restrictions) EXEMPT	0.05	0.01	0.00	0.01	0.00	0.00	58.38
Existing Compressor Seal Gas Leakage (no restrictions or recovery) EXEMPT	0.00	0.00	0.34	0.00	0.00	0.00	765
Existing Domestic Water Heater (no restrictions) EXEMPT	0.01	0.003	0.001	0.002	0.0001	0.00	14.60
Station Blowdowns and ESD (3-year average)	0.00	0.00	0.07	0.00	0.00	0.00	153
Total	**13.21**	**13.37**	**0.47**	**3.90**	**0.15**	**0.55**	**12,359**

New Sources Potential to Emit (PTE) Pounds/Hour (PPH)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Turbine Unit A2 (unlimited operation with oxidation catalyst)	3.07	0.21	0.01	0.85	0.13	0.09	10,353
Existing Emergency Generator (500 hours per year with oxidation catalyst) EXEMPT	3.53	0.69	0.02	0.06	0.01	0.45	735.33
Pipeline Liquids Tank (300 gallons per year) EXEMPT	0.00	0.00	0.23	0.00	0.00	0.00	0.00
Proposed Compressor Seal Gas Leakage (no restrictions but with 90% recovery) EXEMPT	0.00	0.00	0.03	0.00	0.00	0.00	76.50
Incremental Station Blowdowns and ESD (same 3-year average as existing station)	0.00	0.00	0.01	0.00	0.00	0.00	15.29
2023 Minor Modification	**6.60**	**0.90**	**0.30**	**0.92**	**0.14**	**0.54**	**11,180**

Total Facility Potential to Emit (PTE) Pounds/Hour (PPH)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Existing Station	13.2	13.37	0.47	3.90	0.15	0.55	12,359
Proposed Turbine	3.07	0.21	0.01	0.85	0.13	0.09	10,353
Changes due to adding CO oxidation catalyst to existing emergency engine	0.00	-1.60	0.00	0.00	0.00	0.00	0.00
Proposed pipeline liquids collection tank	0.00	0.00	0.23	0.00	0.00	0.00	0.00
Proposed compressor's seal gas emissions	0.00	0.00	0.03	0.00	0.00	0.00	76.50
Changes due to recovering existing facility blowdown and seal gas emissions	0.00	0.00	-0.37	0.00	0.00	0.00	-826
Combined Post-Project Emissions	**16.3**	**12.0**	**0.4**	**4.8**	**0.3**	**0.6**	**21,962**

ATTACHMENT B

Dover Compressor Station Revised Application Forms and Potential to Emit Tables

New York State Department of Environmental Conservation
Air Permit Application

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

DEC ID	Application ID	Application Type
3-1326-00211	- - /	× State Facility Title V

Section I - Certification

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information required to complete this application, I believe the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Responsible Official: Paul R. Amato	Title: VP Engineering, Operations and EH+S
Signature:	Date: 5/13/2021

Professional Engineer Certification

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments as they pertain to the practice of engineering. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Professional Engineer: Ronald E. Schroeder	NYS License No. 073452
Signature:	Date: May 4, 2021

STATE OF NEW YORK 073452 LICENSED PROFESSIONAL ENGINEER

Section II - Identification Information

Type of Permit Action Requested

New Renewal Significant Modification Administrative Amendment × Minor Modification

Application for the construction of a new facility × Application involves the construction of new emission unit(s)

Facility Information

Name: Dover Compressor Station

Location Address: 186 Dover Furnace Road

City / × Town / Village: Dover Zip: 12522

Owner/Firm Information

Business Taxpayer ID: 061285387

Name: Iroquois Gas Transmission System, L.P.

Street Address: One Corporate Drive, Suite 600

City: Shelton State/Province: CT Country: USA Zip: 06484

Owner Classification: Federal State Municipal × Corporation/Partnership Individual

Owner/Firm Contact Information

Name: James T. Barnes Phone: 203-944-7023

E-mail Address: tim_barnes@iroquois.com Fax: 203-925-7213

Affiliation: Company Title: Manager, Environmental Services

Street Address: One Corporate Drive, Suite 600

City: Shelton State/Province: CT Country: USA Zip: 06484

Facility Contact Information

Name: James T. Barnes Phone: 203-944-7023

E-mail Address: tim_barnes@iroquois.com Fax: 203-925-7213

Affiliation: Company Title: Manager, Environmental Services

Street Address: One Corporate Drive, Suite 600

City: Shelton State/Province: CT Country: USA Zip: 06484

New York State Department of Environmental Conservation
Air Permit Application

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

DEC ID
3 - 1 3 2 6 - 0 0 2 1 1

Facility Compliance Certification

☐ Continuation Sheet(s)

Rule Citation

Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
40	CFR	60	KKKK	60.4330	(a)	(a)(2)			

× Applicable Federal Requirement / State Only Requirement	Capping	CAS Number	Contaminant Name
		7446-09-5	Sulfur Dioxide

Monitoring Information

Work Practice Involving Specific Operations | Ambient Air Monitoring | × Record Keeping/Maintenance Procedures

Compliance Activity Description

Iroquois will comply with its Federal Energy Regulatory Commission natural gas tariff delivery point sulfur content limit (currently 1.25 gains per 100 Scf) at the compressor station. As a result, the turbines will not burn fuel emitting potential sulfur emissions in excess of the New Source Performance Standards (40 CFR Subpart KKKK) limit of 0.06 pounds of sulfur dioxide per million Btus of fuel heat input, which is equivalent to 21 grains of sulfur per 100 Scf.

Work Practice Type Code	Process Material Code	Process Material Description	Reference Test Method
04	32	natural gas fuel	ISO 19739

Monitored Parameter Code	Monitored Parameter Description	Manufacturer's Name/Model Number
32	fuel sulfur content	Galvanic Applied Science, Model: TS903

Limit Upper	Limit Lower	Limit Units Code	Limit Units Description
1.25	0	346	grains sulfur per 100 standard cubic feet

Averaging Method Code	Averaging Method Description	Monitoring Frequency Code	Monitoring Frequency Description	Reporting Requirements Code	Reporting Requirements Description
01	maximum not be exceeded	09	annually	10	upon request

Facility Emissions Summary

☐ Continuation Sheet(s)

CAS Number	Contaminant Name	Potential to Emit (tons/yr)	Actual Emissions (pounds/yr)
0NY075 - 00 - 5	PM-10	30.5	9,551
0NY750 - 02 - 5	PM-2.5	30.5	9,551
007446 - 09 - 5	Sulfur Dioxide	1.6	2,507
0NY210 - 00 - 0	Oxides of Nitrogen	65.1	28,359
000630 - 08 - 0	Carbon Monoxide	15.2	2,764
007439 - 92 - 1	Lead (elemental)	0.0	0.0
0NY998 - 00 - 0	Total Volatile Organic Compounds	1.7	2,142
0NY100 - 00 - 0	Total Hazardous Air Pollutants	1.2	318
0NY750 - 00 - 0	Carbon Dioxide Equivalents	119,197	33,809,633

New York State Department of Environmental Conservation
Air Permit Application

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

DEC ID
3-132-00211

Section IV - Emission Unit Information

Emission Unit Description ☐ Continuation Sheet(s)

Emission Unit: 5-00001

The entire natural gas pipeline compressor station is the "emission unit". It includes a single existing, natural gas-fired simple-cycle combustion turbine and compression facilities to boost natural gas pressure in the pipeline for delivery to customers. The proposed project would add a second approximately 12,000 horsepower (HP) maximum rated simple-cycle low NOx natural gas fueled combustion turbine with an oxidation catalyst to drive a second natural gas pipeline compressor. The project also would replace the existing permit-exempt 750 HP reciprocating, natural gas-fired, emergency generator engine with a similar new permit-exempt lean burn EPA-certified approximately 1,500 HP emergency engine with CO oxidation catalyst. The facility would maintain two existing small natural gas combustion sources (heaters) that are exempt from air permitting (i.e., less than 10 million Btus/Hour fuel input rating).

Building Information ☐ Continuation Sheet(s)

Building ID	Building Name	Length (ft)	Width (ft)	Orientation
8	Compressor Building A-1	74	50	40
36	Compressor Building A-2	105	64	170

Emission Unit: 5-00001

Emission Unit Emissions Summary ☒ Continuation Sheet(s)

CAS Number	Contaminant Name			
0NY210-00-0	nitrogen oxides			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
131,828	17.9	130,210	10.0	28,359

CAS Number	Contaminant Name			
00630-08-0	carbon monoxide			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
60,132	6.3	30,508	3.7	2,764

CAS Number	Contaminant Name			
0NY750-02-5	particulate matter (PM2.5)			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
61,031	7.1	60,981	3.3	9,551

CAS Number	Contaminant Name			
0NY998-00-0	volatile organic compounds			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
10,689	1.2	3,393	1.6	2,142

New York State Department of Environmental Conservation
Air Permit Application Form

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

DEC ID
3-1326-00211

Section IV - Emission Unit Information

Emission Unit 5-00001	Emission Unit Emissions Summary (continuation)			
CAS No.	Contaminant Name			
007446-09-5	sulfur dioxide			
ERP (lbs/yr)	PTE Emissions		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
3,121	0.4	3,114	0.8	2,507
CAS No.	Contaminant Name			
0NY100-00-0	combined hazardous air pollutants			
ERP (lbs/yr)	PTE Emissions		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
2,787	1.0	2,430	0.7	318
CAS No.	Contaminant Name			
0NY750-00-0	carbon dioxide equivalents			
ERP (lbs/yr)	PTE Emissions		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
243,229,136	28,304	238,394,719	18,305	33,809,633
CAS No.	Contaminant Name			
ERP (lbs/yr)	PTE Emissions		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
CAS No.	Contaminant Name			
ERP (lbs/yr)	PTE Emissions		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
CAS No.	Contaminant Name			
ERP (lbs/yr)	PTE Emissions		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
CAS No.	Contaminant Name			
ERP (lbs/yr)	PTE Emissions		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)

Continuation Sheet 2 of 2

New York State Department of Environmental Conservation
Air Permit Application Form

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

DEC ID
3-13260-00211

Section IV - Emission Unit Information

Process Emissions Summary (continuation)

Emission Unit	5-00001	Process	001

CAS No.	Contaminant Name	% Throughput	% Capture	% Control	ERP (lbs/hr)	ERP How Determined
0NY750 - 00 - 0	carbon dioxide equivalents	100	100	0	27,059	03

PTE (lbs/hr)	PTE (lbs/yr)	PTE (standard units)	Standard Units	PTE How Determined	Actual (lbs/hr)	Actual (lbs/yr)
27,059	237,038,460	NA	NA	03	16,706	30,570,651

Emission Unit	5-00001	Process	001

CAS No.	Contaminant Name	% Throughput	% Capture	% Control	ERP (lbs/hr)	ERP How Determined
0NY998 - 00 - 0	volatile organic compounds	100	100	0	0.03	02

PTE (lbs/hr)	PTE (lbs/yr)	PTE (standard units)	Standard Units	PTE How Determined	Actual (lbs/hr)	Actual (lbs/yr)
0.03	226	NA	NA	02	0.1	251

Emission Unit	5-00001	Process	001

CAS No.	Contaminant Name	% Throughput	% Capture	% Control	ERP (lbs/hr)	ERP How Determined
007446 - 09 - 5	sulfur dioxide	100	100	0	0.4	02

PTE (lbs/hr)	PTE (lbs/yr)	PTE (standard units)	Standard Units	PTE How Determined	Actual (lbs/hr)	Actual (lbs/yr)
0.4	3,104	0.06	7	02	0.8	2,506

Emission Unit	5-00001	Process	001

CAS No.	Contaminant Name	% Throughput	% Capture	% Control	ERP (lbs/hr)	ERP How Determined
0NYI00 - 00 - 0	hazardous air pollutants	100	100	0	0.24	03

PTE (lbs/hr)	PTE (lbs/yr)	PTE (standard units)	Standard Units	PTE How Determined	Actual (lbs/hr)	Actual (lbs/yr)
0.24	2,067	NA	NA	03	0.1	273

Emission Unit	-	Process	

CAS No.	Contaminant Name	% Throughput	% Capture	% Control	ERP (lbs/hr)	ERP How Determined

PTE (lbs/hr)	PTE (lbs/yr)	PTE (standard units)	Standard Units	PTE How Determined	Actual (lbs/hr)	Actual (lbs/yr)

New York State Department of Environmental Conservation
Air Permit Application

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

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Emission Unit	Emission Point	Process	Emission Source	Emission Unit Applicable Federal Requirements								☐ Continuation Sheet(s)		
				Title	Type	Part	Subpart	Section	Subdiv.	Parag.	Subparag.	Cl.	Subcl.
00001	00002	001	00002	40	CFR	60	KKKK						
00001	00001	001	00001	40	CFR	60	A						
00001	00002	001	00002	40	CFR	60	A						

Emission Unit	Emission Point	Process	Emission Source	Emission Unit State Only Requirements								☒ Continuation Sheet(s)		
				Title	Type	Part	Subpart	Section	Subdiv.	Parag.	Subparag.	Cl.	Subcl.
00001	00001	001	00001	6	NYCRR	200	200.2	safeguarding					
00001	00001	001	00001	6	NYCRR	200	200.3	false statements					
00001	00001	001	00001	6	NYCRR	200	200.4	severability					
00001	00001	001	00001	6	NYCRR	200	200.5	sealing					

Emission Unit Compliance Certification ☐ Continuation Sheet(s)

Rule Citation

Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
40	CFR	60	KKKK	60.4330	(a)	(a)(2)			

× Applicable Federal Requirement ☐ State Only Requirement ☐ Capping

Emission Unit	Emission Point	Process	Emission Source	CAS Number	Contaminant Name
00001	00002	001	00001	7446-09-05	sulfur dioxide

Monitoring Information

☐ Continuous Emission Monitoring
☐ Intermittent Emission Testing
☐ Ambient Air Monitoring
☐ Monitoring of a Process or Control Device Parameters as a Surrogate
☐ Work Practice Involving Specific Operations
× Record Keeping/Maintenance Procedures

Compliance Activity Description

Iroquois will comply with its Federal Energy Regulatory Commission natural gas tariff delivery point sulfur content limit (currently 1.25 gains per 100 Scf) at the compressor station. As a result, the turbines will not burn fuel emitting potential sulfur emissions in excess of the New Source Performance Standards (40 CFR Subpart KKKK) limit of 0.06 pounds of sulfur dioxide per million Btus of fuel heat input, which is equivalent to 21 grains of sulfur per 100 Scf.

Work Practice Type Code	Process Material		Reference Test Method
	Code	Description	
04	32	natural gas fuel	ISO 19739

Monitored Parameter		Manufacturer's Name/Model Number
Code	Description	
32	fuel sulfur content	Galvanic Applied Science, Model: TS903

Limit		Limit Units	
Upper	Lower	Code	Description
1.25	0	346	grains sulfur per 100 standard cubic feet

Averaging Method		Monitoring Frequency		Reporting Requirements	
Code	Description	Code	Description	Code	Description
01	maximum not to be exceeded	09	annually	10	upon request

New York State Department of Environmental Conservation
Air Permit Application

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

DEC ID
3-13261-00211

Supporting Documentation and Attachments	
Required Supporting Documentation	Date of Document
× List of Exempt Activities (attach form)	2/28/20
× Plot Plan	2/14/20 + 11/5/20
× Process Flow Diagram	2/28/20
Methods Used to Determine Compliance (attach form)	
× Emissions Calculations	5/2021
Optional Supporting Documentation	Date of Document
× Air Quality Model	April and November, 2020
Confidentiality Justification	
Ambient Air Quality Monitoring Plan or Reports	
Stack Test Protocol	
Stack Test Report	
Continuous Emissions Monitoring Plan	
Lowest Achievable Emission Rate (LAER) Demonstration	
Best Available Control Technology (BACT) Demonstration	
Reasonably Available Control Technology (RACT) Demonstration	
Toxic Impact Assessment (TIA)	
Environmental Rating Demonstration	
Operational Flexibility Protocol/Description of Alternate Operating Scenarios	
Title IV Permit Application	
Emission Reduction Credit (ERC) Quantification (attach form)	
Baseline Period Demonstration	
Use of Emission Reduction Credits (attach form)	
Analysis of Contemporaneous Emissions Increase/Decrease	
Other Supporting Documentation	Date of Document

Iroquois Pipeline Operating Company
Dover Compressor Station
ExC Project
Table 1 - Potential to Emit - Tons per Year

Existing Sources Potential to Emit (PTE) Tons/Year (TPY)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Turbine Unit A1 (no restrictions)	50.81	13.58	0.09	26.75	0.98	0.65	73,173
Existing Emergency Generator (without oxidation catalyst 500 hours per year) EXEMPT	1.08	0.72	0.31	0.09	0.00	0.14	*219*
Existing Office/Control Room Heat Furnace (no restrictions) EXEMPT	0.11	0.02	0.00	0.01	0.00	0.00	123
Existing Compressor Seal Gas Leakage (no restrictions or recovery) EXEMPT	0.00	0.00	1.73	0.00	0.00	0.00	784
Station Blowdowns and ESD (3-year average)	0.00	0.00	0.17	0.00	0.00	0.00	382
Existing Domestic Water Heater (no restrictions) EXEMPT	0.06	0.01	0.00	0.01	0.00	0.00	63.93
Total	**52.06**	**14.34**	**2.30**	**26.86**	**0.98**	**0.79**	**74,745**

New Sources Potential to Emit (PTE) Tons/Year (TPY)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Turbine Unit A2 (no restrictions)	13.32	0.90	0.03	3.69	0.57	0.38	45,346
Replacement Emergency Generator (with oxidation catalyst 500 hours per year) EXEMPT	0.81	0.74	0.21	0.02	0.00	0.18	289
Pipeline Liquids Tank (300 gallons per year) EXEMPT	0.00	0.00	1.00	0.00	0.00	0.00	0.0
Proposed Compressor Seal Gas Leakage (no restrictions but with 90% recovery) EXEMPT	0.00	0.00	0.17	0.00	0.00	0.00	78.39
Station Blowdowns and ESD (same 3-year average as existing station)	0.00	0.00	0.02	0.00	0.00	0.00	45.80
2023 Minor Modification	**14.12**	**1.64**	**1.43**	**3.72**	**0.57**	**0.56**	**45,759**
Major Source Thresholds	100	100	50	100	100	25	100,000
% Major Source	14.1%	1.6%	2.9%	3.7%	0.6%	2.2%	0.5

Total Facility Potential to Emit (PTE) Tons/Year (TPY)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Existing Station	52.06	14.34	2.30	26.86	0.98	0.79	74,745
Proposed Turbine	13.32	0.90	0.03	3.69	0.57	0.38	45,346
Changes due to replacing emergency engine and installing oxidation catalyst	-0.27	0.02	-0.10	-0.06	0.00	0.04	69.66
Proposed pipeline liquids collection tank	0.00	0.00	1.00	0.00	0.00	0.00	0.00
Proposed compressor's seal gas emissions	0.00	0.00	0.17	0.00	0.00	0.00	78.39
Changes due to recovering existing facility blowdown and seal gas emissions	0.00	0.00	-1.71	0.00	0.00	0.00	-1,041
Combined Post-Project Emissions	**65.1**	**15.2**	**1.7**	**30.5**	**1.6**	**1.2**	**119,197**
Major Source Thresholds	100	100	50	100	100	25	100,000
% Major Source	65.1%	15.2%	3.4%	30.5%	1.6%	4.9%	119.2%

Iroquois Pipeline Operating Company
Dover Compressor Station
ExC Project
Table 2 - Potential to Emit - Pounds per Year

Existing Sources Potential (PTE) Pounds/Year (PPY)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Turbine Unit A1 (no restrictions)	101,616	27,156	171	53,507	1,965	1,309	146,346,460
Existing Emergency Generator (without oxidation catalyst 500 hours per year) EXEMPT	2,150	1,447	620	173	0	271	438,428
Existing Office/Control Room Heat Furnace (no restrictions) EXEMPT	227	48	9	27	1	4	245,486
Existing Compressor Seal Gas Leakage (no restrictions or recovery) EXEMPT	0	0	3,467	0	0	0	1,567,849
Station Blowdowns and ESD (3-year average)	0	0	337	0	0	0	763,079
Existing Domestic Water Heater (no restrictions) EXEMPT	118	25	5	14	1	2	127,857
Total	**104,112**	**28,676**	**4,609**	**53,722**	**1,967**	**1,586**	**149,489,158**

New Soruces Potential to Emit (PTE) Pounds/Year (PPY)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Turbine Unit A2 (no restrictions)	26,630	1,799	54	7,382	1,139	758	90,692,000
Replacement Emergency Generator (with oxidation catalyst 500 hours per year) EXEMPT	1,618	1,481	421	50	7	357	577,739
Pipeline Liquids Tank (300 gallons per year) EXEMPT	0	0	1,999	0	0	0	0
Proposed Compressor Seal Gas Leakage (no restrictions but with 90% recovery) EXEMPT	0	0	347	0	0	0	156,785
Station Blowdowns and ESD (same 3-year average as existing station)	0	0	41	0	0	0	91,608
2023 Minor Modification	**28,249**	**3,279**	**2,862**	**7,432**	**1,146**	**1115.6**	**91,518,131**

Total Facility Potential to Emit (PTE) Pounds/Year (PPY)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Existing Station	104,112	28,676	4,609	53,722	1,967	1,586	149,489,158
Proposed Turbine	26,630	1,799	54.41	7,382	1,139	758	90,692,000
Changes due to replacing emergency engine and installing oxidation catalyst	-532	33.31	-200	-123	7.27	86.14	139,311
Proposped pipeline liquids collection tank	0.00	0.00	1,999	0.00	0.00	0.00	0.00
Proposed compressor's seal gas emissions	0.00	0.00	347	0.00	0.00	0.00	156,785
Changes due to recovering existing facility blowdown and seal gas emissions	0	0	-3,417	0	0	0	-2,082,535
Combined Post-Project Emissions	**130,210**	**30,508**	**3,393**	**60,981**	**3,114**	**2,430**	**238,394,719**

Iroquois Pipeline Operating Company
Dover Compressor Station
ExC Project
Table 3 - Potential to Emit - Pounds per Hour

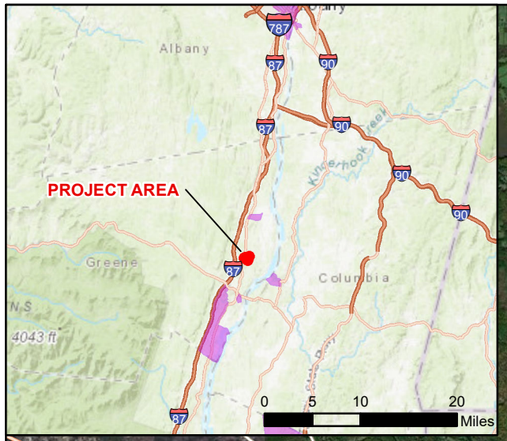
Existing Sources Potential to Emit (PTE) Pounds/Hour (PPH)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Turbine Unit A1 (no restrictions)	11.60	3.10	0.02	6.11	0.22	0.15	16,706
Existing Emergency Generator (without oxidation catalyst 500 hours per year) EXEMPT	4.30	2.89	1.24	0.35	0.00	0.54	877
Existing Office/Control Room Heat Furnace (no restrictions) EXEMPT	0.03	0.01	0.00	0.00	0.00	0.00	28.02
Existing Compressor Seal Gas Leakage (no restrictions or recovery) EXEMPT	0.00	0.00	0.40	0.00	0.00	0.00	179
Station Blowdowns and ESD (3-year average)	0.00	0.00	0.039	0.00	0.00	0.00	87.11
Existing Domestic Water Heater (no restrictions) EXEMPT	0.01	0.00	0.00	0.00	0.00	0.00	14.60
Total	**15.94**	**6.00**	**1.70**	**6.46**	**0.22**	**0.69**	**17,892**

New Sources Potential to Emit (PTE) Pounds/Hour (PPH)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Turbine Unit A2 (no restrictions)	3.04	0.21	0.01	0.84	0.13	0.09	10,353
Replacement Emergency Generator (with oxidation catalyst 500 hours per year) EXEMPT	3.24	2.96	0.84	0.10	0.01	0.71	1,155
Pipeline Liquids Tank (300 gallons per year) EXEMPT	0.00	0.00	0.23	0.00	0.00	0.00	0.00
Proposed Compressor Seal Gas Leakage (no restrictions but with 90% recovery) EXEMPT	0.00	0.00	0.04	0.00	0.00	0.00	17.90
Station Blowdowns and ESD (same 3-year average as existing station)	0.00	0.00	0.005	0.00	0.00	0.00	10.46
2023 Minor Modification	**6.28**	**3.17**	**1.12**	**0.94**	**0.14**	**0.80**	**11,537**

Total Facility Potential to Emit (PTE) Pounds/Hour (PPH)							
	NOx	**CO**	**VOC**	**PM**	**SO2**	**HAPs**	**GHG**
Existing Station	15.94	6.00	1.70	6.46	0.22	0.69	17,892
Proposed Turbine	3.04	0.21	0.01	0.84	0.13	0.09	10,353
Changes due to replacing emergency engine and installing oxidation catalyst	-1.06	0.07	-0.40	-0.25	0.01	0.17	279
Proposped pipeline liquids collection tank	0.00	0.00	0.23	0.00	0.00	0.00	0.00
Proposed compressor's seal gas emissions	0.00	0.00	0.04	0.00	0.00	0.00	17.90
Changes due to recovering existing facility blowdown and seal gas emissions	0.00	0.00	-0.39	0.00	0.00	0.00	-238
Combined Post-Project Emissions	**17.9**	**6.3**	**1.2**	**7.1**	**0.4**	**1.0**	**28,304**

ATTACHMENT C

Potential Environmental Justice Area Maps



PROPOSED & EXISTING ATHENS COMPRESSOR STATION LOCATION

Greene County

Columbia County

81 9J 87 9W 9 9H 66 32 23 9G 23B 23A

POTENTIAL ENVIRONMENTAL JUSTICE AREA
PROJECT LIMIT OF DISTURBANCE
IROQUOIS PIPELINE MAINLINE
MAJOR HIGHWAY
HIGHWAY
MAJOR ROAD

IROQUOIS GAS TRANSMISSION SYSTEM, INC.

ENHANCEMENT BY COMPRESSION PROJECT

ATHENS COMPRESSOR STATION
POTENTIAL ENVIRONMENTAL JUSTICE AREAS

GREENE COUNTY, NEW YORK

0 1 2 4 Miles

N W E S

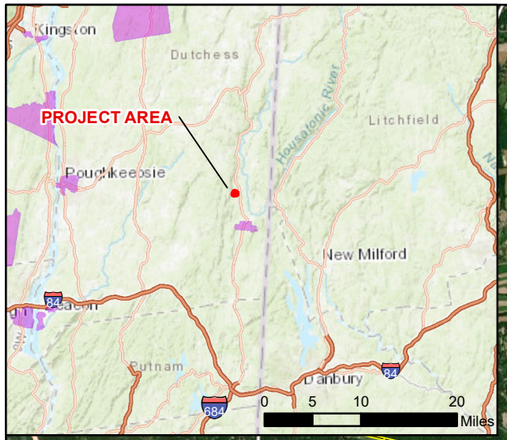
ABSOLUTE SCALE: 1:84,000

REFERENCE SCALE: 1 inch = 7,000 feet

Iroquois

MOTT MACDONALD
5295 S. Commerce Dr., Ste. 500
Salt Lake City, UT 84107

DRAWN BY:	JLM
CHECKED BY:	DRG
APPROVED BY:	DRG
REV. DATE:	05/07/2021
REVISION:	B
DESC:	IFP
DWG. NO.	1 OF 2



- POTENTIAL ENVIRONMENTAL JUSTICE AREA
- PROJECT LIMIT OF DISTURBANCE
- IROQUOIS PIPELINE MAINLINE
- MAJOR HIGHWAY
- HIGHWAY
- MAJOR ROAD

IROQUOIS GAS TRANSMISSION SYSTEM, INC.

ENHANCEMENT BY COMPRESSION PROJECT

DOVER COMPRESSOR STATION
POTENTIAL ENVIRONMENTAL JUSTICE AREAS

DUTCHESS COUNTY, NEW YORK

0 1 2 4 Miles

N W E S

ABSOLUTE SCALE: 1:84,000

REFERENCE SCALE: 1 inch = 7,000 feet

Iroquois

MOTT MACDONALD

5295 S. Commerce Dr., Ste. 500
Salt Lake City, UT 84107

DRAWN BY:	JLM
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DWG. NO.	2 OF 2