



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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VIA U.S. Mail and Electronic Mail: brad.shamla@enbridge.com

September 29, 2020

Mr. Brad Shamla
Vice President, U.S. Operations
Algonquin Gas Transmission, LLC
5400 Westheimer Ct.
Houston, Texas 77056

Re: Weymouth
Class: SM-25
FMF No.: 571926

RE: Final BACT Determination for Weymouth Compressor Station

Dear Mr. Shamla:

On August 7, 2020, the Massachusetts Department of Environmental Protection (“MassDEP”), Bureau of Air and Waste issued a preliminary best available control technology (“BACT”) determination to you pursuant to the *Proposed Remand Adjudication Schedule*, dated June 22, 2020, issued by Presiding Officer Jane Rothchild and approved by the Commissioner on June 24, 2020 (“Remand Schedule”). The preliminary BACT determination was based on the Addendum submitted to MassDEP by Algonquin Gas Transmission, LLC (“Algonquin”) on July 24, 2020, and additional information submitted on August 3, 2020, August 5, 2020 and August 7, 2020, to supplement Algonquin’s Non-major Comprehensive Plan Application (“Application”).

After further review and evaluation, including review of over 230 comments received by MassDEP on the preliminary BACT determination, MassDEP has determined that an electric motor drive (“EMD”) does not represent BACT, because 1) an EMD is properly excluded in Step 1 of the top-down BACT analysis because it would redefine the source; and 2) even if an EMD were not excluded in Step 1, an EMD is not a cost-effective control under Step 4 of the top-down BACT analysis. Therefore, MassDEP reaffirms its BACT determination in the Plan Approval issued on August 26, 2019.

In support of its final BACT determination, MassDEP filed with the Office of Appeals and Dispute Resolution (“OADR”) my pre-filed direct testimony related to the BACT analysis and Glenn Keith’s pre-filed direct testimony related specifically to the issue of redefining the source.

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.
TTY# MassRelay Service 1-800-439-2370

MassDEP Website: www.mass.gov/dep

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This testimony is required by the Remand Schedule issued by OADR. In addition, a response to comment document that addresses the comments received by MassDEP on the preliminary BACT determination is posted on MassDEP's website and filed with OADR.

Thomas Cushing

Thomas Cushing
Air Quality Section Chief
Bureau of Air and Waste

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