



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

**Unum Corporation
Cumberland County
Portland, Maine
A-657-71-J-M (SM)**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #2**

After review of the air emissions license application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Unum Corporation (Unum) of Portland, Maine was issued Air Emission License A-657-71-H-R on October 26, 2007, permitting the operation of emission sources associated with their insurance office building. This License was amended on December 19, 2008.

Unum has requested a modification to their Air Emission License in order to use Generators #4 and #5 for demand response and facility peak shaving.

B. Application Classification

As Unum is not requesting an increase in licensed generator operating time, this amendment will not increase emissions of any pollutant. Therefore, this modification is determined to be a minor revision and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 24, 2005).

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Definitions Regulation, 06-096 CMR 100 (last amended December 24, 2005). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 624-6550 FAX: (207) 624-6024
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-6477 FAX: (207) 764-1507

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. Generators #4 and #5

Unum's current air emission license specifically prohibits them from running their emergency generators, for purposes other than for regular maintenance, until off-site power becomes unavailable.

In order for Unum to participate in the Demand Response Program, they need to start their generators and run them prior to, or in lieu of, loss of off-site power. Unum will only operate in this manner if there is a documented request from ISO New England under their emergency OP-4 procedures. ISO New England's OP-4 is a procedure which establishes criteria and guidelines for actions during capacity deficiencies. OP-4 is implemented when there is determined to be a serious threat to the integrity of the bulk power system.

Unum has also requested that Generators #4 and #5 be permitted to peak shave to provide an additional benefit for the facility during times of peak power demand. Therefore, BPT for Generators #4 and #5 shall consist of the following:

1. Unum shall be permitted to operate Generators #4 and #5 in response to an OP-4 emergency for a combined total of no more than 50 hours on a 12 month rolling total.
2. Unum shall be permitted to operate Generators #4 and #5 for purposes of peak shaving for a combined total of no more than 50 hours on a 12 month rolling total.

III. AMBIENT AIR QUALITY ANALYSIS

According to 06-096 CMR 115, the level of air quality analyses required for a minor source shall be determined on a case-by-case basis. Based on the information available in the file, and the similarity to existing sources, Maine Ambient Air Quality Standards (MAAQS) will not be violated by this source.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-657-71-J-M subject to the conditions found in Air Emission Licenses A-657-71-H-R and A-657-71-I-M, and the following conditions:

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

SPECIFIC CONDITIONS

The following are new conditions to be added to Specific Condition 17 in Air Emission License A-657-71-H-R:

- (17) Back-up Generators
- J. Unum shall only operate Generators HO1-Gen #1, HO2-Gen #2, and HO3-Gen #3 for periods of maintenance and readiness testing, emergencies when off-site power is unavailable. [06-096 CMR 115, BPT]
 - K. Unum shall only operate Generators #4, and #5 for periods of maintenance and readiness testing, emergencies when off-site power is unavailable, ISO New England OP-4 emergencies, or facility peak shaving events. [06-096 CMR 115, BPT]
 - L. Unum shall keep records for OP-4 emergencies which include the date, which generators were operated, start time and stop time for each generator, and documentation that Unum was contacted by ISO New England and asked to reduce consumption as part of an OP-4 event. [06-096 CMR 115, BPT]
 - M. Unum shall not operate Generators #4 and #5 for more than a combined total of 50 hours on a 12 month rolling total in response to an OP-4 emergency, and no more than a combined total of 50 hours on a 12 month rolling total for facility peak shaving. [06-096 CMR 115, BPT]

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- N. Unum shall submit an annual report documenting all times and reasons for generator operation by January 31st of each year. [06-096 CMR 115, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS 2ND DAY OF October 2009.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Brooker
DAVID P. LITTELL, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-657-71-H-R.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 8/10/2009

Date of application acceptance: 8/31/2009

Date filed with the Board of Environmental Protection: _____

This Order prepared by Jonathan Voisine, Bureau of Air Quality.

