

**Portland Water District – Sebago
Lake Water Treatment Facility
Cumberland County
Standish, Maine
A-559-71-F-M**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #1**

After review of the air emissions license amendment 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

1. Portland Water District’s (PWD) Sebago Lake Water Treatment Facility (SLWTF) of Standish, Maine was issued Air Emission License A-559-71-E-R on May 31, 2005 permitting the operation of emission sources associated with their facility.
2. PWD has requested a minor revision to their license in order to redefine the term “emergency” as it pertains to the operation of the facility’s emergency diesel generators.

B. Revision Description

PWD’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. That is the point at which the term “emergency” has traditionally been applied.

Due to the potential for tight electricity supplies, ISO New England has taken several precautionary steps to ensure the reliability of the region-wide bulk power system. One of those steps is the implementation of the Demand Response Winter Supplemental Program. This program offers financial incentives to customers, such as PWD, to reduce electricity demand during peak periods thus significantly improving the reliability of the region-wide bulk power system and allowing ISO New England to avoid drastic measures, such as brown outs.

For the most part, PWD feels it can meet these load response requests by simply treating more water during off-peak hours and then cutting back significantly on power usage during high power demand days. There may be rare occasions when it will be necessary for PWD to run their emergency generators to meet the water distribution system demand due to unexpected high water usage.

In order for PWD 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. PWD 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 guides 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. Therefore, the Department has agreed to redefine the term "emergency" as it applies to PWD's generators to include ISO New England OP-4 emergencies. Additionally, although PWD is enrolling in the 12-month Load Response Program, for the period between December 1st and December 31st, PWD shall only be permitted to operate their generators in response to an OP-4 emergency between December 1st and March 31st of each year and for a total of no more than 50 hours for each winter season. OP-4 emergencies during other times of the year will be handled at PWD by a reduction in power usage.

C. Application Classification

This amendment will not increase permitted emissions of any pollutant. Therefore, this modification is determined to be a minor revision and has been processed as such.

ORDER

The Department hereby grants Air Emission License Minor Revision A-559-71-F-M subject to the conditions found in Air Emission License A-559-71-E-R, 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.

The following are new Conditions:

(21) **OP-4 Emergencies**

- A. PWD shall only operate the emergency generators for periods of maintenance, emergencies when off-site power is unavailable, and ISO New England OP-4 emergencies. PWD shall only operate the generators for OP-4 emergencies between December 1st and March 31st of each year. OP-4 emergency requests at other times during the year shall be handled by PWD without operating their generators. [MEDEP Chapter 115, BPT]
- B. PWD 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 PWD was contacted by ISO New England and asked to reduce consumption as part of an OP-4 event. [MEDEP Chapter 115, BPT]
- C. PWD shall not operate the emergency generators for more than 50 hours each between December 1st and March 31st of each year in response to an OP-4 emergency. [MEDEP Chapter 115, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2006.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
 DAVID P. LITTELL, ACTING COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-559-71-E-R.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: December 7, 2005

Date of application acceptance: December 8, 2005

Date filed with the Board of Environmental Protection: _____

This Order prepared by Rachel E. Pilling, Bureau of Air Quality.