

14 May 2012

Eric Gasbarro
Vice President Human Resources
Blue Cross Blue Shield of Rhode Island
500 Exchange Street
Providence, RI 02903-2699

Dear Mr. Gasbarro:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your applications for permits for three Emergency Generators at your facility located at 500 Exchange Street, Providence, RI.

Enclosed are a General Permit and two Minor Source Permits issued pursuant to our review of your applications (General Permit No. GPEG-111 and Approval Nos. 2164 and 2165).

These generators were installed in 2009 without first obtaining an approval as required by RI Air Pollution Control Regulation No. 9. A Notice of Violation, which was issued by the Department of Environmental Management in March 2012, was settled in April 2011. The issuance of the general permit and the minor source permits brings Blue Cross Blue Shield of Rhode Island into compliance with the requirement to obtain approvals for these generators.

If there are any questions concerning these permits, please contact me at 401-222-2808, extension 7418.

Sincerely,

Carlene B. Newman
Air Quality Specialist
Office of Air Resources

Cc: Don DiCristofaro, Blue Sky Environmental, LLC

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES

MINOR SOURCE PERMIT

BLUE CROSS BLUE SHIELD OF RHODE ISLAND

APPROVAL NOs. 2164 and 2165

Pursuant to the provisions of Air Pollution Control Regulation No. 9, this minor source permit is issued to:

Blue Cross Blue Shield of Rhode Island

For the following:

Two Caterpillar emergency generators, Model G3512LE, Serial Nos., CTM00525 and

CTM00546, 814 HP, 570 kW units. These emergency generators are to be fired with

natural gas only.

Located at: *Blue Cross Blue Shield of Rhode Island*

500 Exchange Street, Providence, RI (SE corner of roof)

This permit shall be effective from the date of its issuance and shall remain in effect until revoked by or surrendered to the Department. This permit does not relieve *Blue Cross Blue Shield of Rhode Island* from compliance with applicable state and federal air pollution control rules and regulations. The design, construction and operation of this equipment shall be subject to the attached permit conditions and emission limitations.

**Douglas L. McVay, Acting Chief
Office of Air Resources**

Date of Issuance

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES**

Permit Conditions and Emission Limitations

BLUE CROSS BLUE SHIELD OF RHODE ISLAND

APPROVAL NOs. 2164 and 2165

A. Emission Limitations

1. Sulfur Dioxide

The sulfur content of any gaseous fuel burned in the emergency generators shall not exceed 10 grains total sulfur per 100 dry standard cubic feet.

2. Visible emissions from the emergency generators shall not exceed 10% opacity except for a period or periods aggregating no more than three minutes in any one-hour. This visible emission limitation shall not apply during startup of an emergency generator. Startup shall be defined as the first ten minutes of firing following the initiation of firing.

B. Operating Requirements

1. The maximum firing rate for the each emergency generator shall not exceed 5,626 cubic feet per hour.
2. The emergency generators shall each not operate more than 500 hours in any consecutive 12-month period.
3. The emergency generators shall be used only during emergencies or for maintenance or testing purposes. Emergency means an electric power outage due to a failure of the electrical grid, on-site disaster, local equipment failure, or public service emergencies such as flood, fire, or natural disaster. Emergency shall also mean periods during which ISO New England, or any successor Regional Transmission Organization, directs the implementation of operating procedures for voltage reductions, voluntary load curtailments by customers or automatic or manual load shedding within Rhode Island in response to unusually low frequency, equipment overload, capacity or energy deficiency, unacceptable voltage levels or other such emergency conditions.
4. The emergency generators shall not be operated in conjunction with any voluntary demand-reduction program or any other interruptible power supply arrangement with a utility, other market participant or system operator unless such program is

implemented at the same time as ISO New England, or any successor Regional Transmission Organization, directs the implementation of operating procedures for voltage reductions, voluntary load curtailments by customers or automatic or manual load shedding within Rhode Island in response to unusually low frequency, equipment overload, capacity or energy deficiency, unacceptable voltage levels or other such emergency conditions.

C. Continuous Monitoring

1. The emergency generators shall be equipped with non-resettable elapsed time meters to indicate, in cumulative hours, the elapsed engine operating time for each unit.

D. Record Keeping and Reporting

1. The owner/operator shall, on a monthly basis, no later than 5 days after the first of each month, determine and record the hours of operation and fuel use for each emergency generator for the previous 12-month period.
2. The owner/operator shall notify the Office of Air Resources, in writing, whenever the hours of operation in any 12-month period exceed 500 hours for either emergency generator.
3. The owner/operator shall notify the Office of Air Resources of any anticipated noncompliance with the terms of this permit or any other applicable air pollution control rules and regulations.
4. The owner/operator shall notify the Office of Air Resources in writing of any planned physical or operational change to any equipment that would:
 - a. Change the representation of the facility in the application.
 - b. Alter the applicability of any state or federal air pollution rules or regulations.
 - c. Result in the violation of any terms or conditions of this permit.
 - d. Qualify as a modification under APC Regulation No. 9.

Such notification shall include:

- Information describing the nature of the change.
- Information describing the effect of the change on the emission of any air contaminant.

- The scheduled completion date of the planned change.

Any such change shall be consistent with the appropriate regulation and have the prior approval of the Director.

5. The owner/operator shall notify the Office of Air Resources, in writing, of any noncompliance with the terms of this permit within 30 calendar days of becoming aware of such occurrence and supply the Director with the following information:
 - a. The name and location of the facility;
 - b. The subject source(s) that caused the noncompliance with the permit term;
 - c. The time and date of first observation of the incident of noncompliance;
 - d. The cause and expected duration of the incident of noncompliance;
 - e. The estimated rate of emissions (expressed in lbs/hr or lbs/day) during the incident and the operating data and calculations used in estimating the emission rate.
 - f. The proposed corrective actions and schedule to correct the conditions causing the incidence of noncompliance.
6. All records required as a condition of this permit shall be maintained for a minimum of five years after the date of each record and shall be made available to representatives of the Office of Air Resources upon request.

E. Other Permit Conditions

1. To the extent consistent with the requirements of this approval and applicable Federal and State laws, the emergency generators shall be designed, constructed and operated in accordance with the representation of the equipment in the permit application.
2. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter the facility at all times for the purpose of inspecting any air pollution source, investigating any condition it believes may be causing air pollution or examining any records required to be maintained by the Office of Air Resources.
3. At all times, including periods of startup, shutdown and malfunction, the owner/operator shall, to the extent practicable, maintain and operate the emergency generators in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on

information available to the Office of Air Resources which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the emergency generators.

4. The owner/operator is subject to the requirements of 40 CFR 60, Subpart A (General Provisions) and Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines). Compliance with all applicable provisions therein is required.