



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

4/8/2014

Certified Mail

Robert Perry
FirstEnergy Generation LLC, Bay Shore Plant
76 S. Main St. (AGO-13)
Akron, OH 44308-0000

Facility ID: 0448020006
Permit Number: P0105130
County: Lucas

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA) Preliminary Proposed Title V permit that was issued in draft form on 9/24/2013. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments. If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Toledo Department of Environmental Services



Response to Comments

Facility ID:	0448020006
Facility Name:	Toledo Edison Co., Bay Shore Plant
Facility Description:	Power plant
Facility Address:	4701 Bay Shore Road Oregon, OH 43616-0000 Lucas County
Permit:	P0105130, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Toledo Blade on 09/25/2013. The comment period ended on 10/25/2013.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: Comments from Permittee

- a. Comment: The permit should be issued to:

FirstEnergy Generation, LLC, Bay Shore Plant

4701 Bay Shore Road

Oregon, OH 43616

Response: Ohio EPA issues the permit to the facility name and address entered by the applicant in Air Services. At the time of issuance of the Draft Permit, the facility name as submitted by the applicant in Air Services was still identified as Toledo Edison. On 11/8/2013, FirstEnergy submitted an Air Services facility profile change to change the facility name to: "FirstEnergy Generation LLC, Bay Shore Plant". The submitted facility profile change does not contain a comma after "Generation" as requested in the above comment, so if the comma is still requested after "Generation", then the permittee needs to submit a facility profile change to include the extra comma in the company name identified. Based on the current facility profile, the final permit will be issued to: "FirstEnergy Generation LLC, Bay Shore Plant".

- b. Comment: The following language should be added to further clarify operation of the plant during emergencies: "except where electrical energy is necessary for the protection of public



health and safety or for the prevention of unnecessary or avoidable damage to property."

The statutory and regulatory support of the above can be found in ORC 4935.03 (B) and in CAA Section 110(f). ORC 4935.03(B) authorizes the governor to declare an energy emergency in the state and CAA Section 110(f) provides for the suspension of portions of the SIP due to a national or regional energy emergency.

Response: First, both the Governor and the President can temporarily suspend an applicable requirement in the event of an emergency under sections 110(f) and (g) of the Clean Air Act. Second, the affected utility can use the emergency provision of the Title V program to establish an affirmative defense of emergency under OAC rule 3745-77-07(G), 40 CFR Part 70.6(f) and Standard Term and Condition 16 of the Title V permit. These mechanisms are far more precise than the suggested wording provided above and are a better mechanism for exempting or providing an affirmative defense for the exceedance of emissions limits resulting from an electric system emergency. Ohio EPA declines to modify Standard Terms and Condition A.16. for the reasons stated above.

- c. **Comment:** C. Emissions Unit Terms and Conditions
1. B005, Gas Turbine

Page 21 of 141

B005, Gas Turbine description incorrectly uses "maximum" which should be changed to "nominal."

Response: The requested change will be made.

- d. **Comment:** Page 22 of 141

The monitoring requirements in 1. d) (1) should be deleted as they were not contained in the original PTI or in the previous Title V permit. The emissions unit has a 20 per cent opacity limit, however, this language requires that we report "any visible emissions" even during normal operations. As pointed out in our next comment, any new monitoring or reporting requirement should require reporting only if the visible emissions observed during the inspection are not representative of normal operations.

Response: This emissions unit did not previously receive a PTI. The previous Title V permit did not contain this term, since TES had thought that this emissions unit was considered inherently clean and that visible emissions would not be an issue with this emissions unit. However, the last time TES saw this emissions unit in operation in 2012, there was significant black smoke. It was indicated that the pump on the smoke suppression system at the combustion turbine failed. Term d)(1) is the standard term contained in Ohio EPA's Permit Library of Terms and Conditions for emissions units having a 20% opacity visible emissions limitation. No change is recommended to this term.



e. Comment: Page 23 of 141

The reporting requirement in 1. e) (1) a. and b. should be amended to add the words "not representative of normal operations" after "particulate emissions."

Response: No change is recommended to this term, since it is the standard term contained in Ohio EPA's Permit Library of Terms and Conditions for emissions units having a 20% opacity visible emissions limitation.

f. Comment: Page 24 of 141

The reporting requirement in 1. e) (3) should be deleted:

The permittee shall provide advanced notification to the Toledo Division of Environmental Services (TES) of the date and time of each startup of this emissions unit to allow for TES to conduct visible emissions observations at this emissions unit. This notification may be made by telephone or email.

We are concerned about the practical application of this requirement. B005 rarely operates, typically, only once per year to demonstrate black start capability for the Bay Shore Plant. The unit operated 1.5 hours in 2010, 5.88 hours in 2011, 4.35 hours in 2012 and just over 11 hours thus far in 2013. This unit may be called into service by PJM providing as little as 15 minutes notice but due to oil costs it is very expensive unit to operate, around \$10,000 per hour, and typically is not economic to operate. And on those infrequent occasions when the unit is called into service it only runs for a limited amount of time as is shown by these historical operating hours.

This notification requirement should be deleted due to the new requirement to conduct a visible emission inspection when the unit is operating. The addition of this notice requirement is unnecessary and logistically is unlikely to allow enough advanced notice for the Agency to conduct a duplicative visible emission observation. It is important to note that due to a PJM requirement that the unit be available in as little as 15 minutes the facility is unable to wait for TDES to arrive before the unit is put into operation.

Response: This term will be modified to require advance notification to TES of each annual black start test of this emissions unit to provide TES with the opportunity to conduct visible emissions observations at the combustion turbine. The term is being written to require advance notification of each annual black start test occurring during the term of the permit, in case weather conditions, such as heavy rain, prevent TES from conducting visible emissions observations. The notification requirement will be terminated after TES successfully records visible emissions of this emissions unit while it is in operation.

g. Comment: Page 25 of 141

The testing requirement 1. f) (2) a. should similarly be deleted:

The emission testing shall be conducted within 6 months after the effective date of the permit. If the emissions unit is not operating during this time period, then the emission testing shall be conducted within 60 days after the next startup of the emission unit.



As noted above this unit operates very infrequently hence scheduling a test of this type is not practical. The unit is scheduled to operate for about an hour once per year, due, in part, to its very high operating cost. Conducting a scheduled Method 9 emission test within 60 days after the next startup of the unit is not a practical requirement, particularly, when there is no way to predict when or even if PJM will order the unit's operation. If the agency retains the testing requirement, the time period for a test should be extended to within one year after the next startup of the unit.

Response: This term will be removed, since the permit will contain a notification requirement to allow TES to conduct visible emissions observations during the annual black start testing of this emissions unit.

h. Comment: The testing requirements in 1. f) (2) should also be deleted.

The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

The previous Title V or the existing PTI does not contain this language which is very subjective, allowing Ohio EPA to reject a test if it feels it doesn't meet some unspecified criteria. Our emission tests are based on Ohio EPA's Engineering Guide 17 so the above language is unnecessary and should be deleted.

Response: As discussed in the previous response, this term is being deleted.

i. Comment: 2. B006, Circulating Fluidized Bed Boiler

Page 30 of 141

Additional Terms and Conditions in b. (2). g. i., ii., iii., iv. includes the subpart Da SO₂ requirements that were issued a number of years after the original PTI was issued for B006. The NSPS requirements that existed when this unit was originally permitted were limited to G. i. and G. ii. This is noted in the original PTI in the Emissions Summary on Pages 4 and 5 and also on Page 19 under Additional Terms and Conditions; C. Reporting Requirements of Emission Unit B006; 2. SO₂; c. The following language should be added after the *italic* language to clarify that compliance can be achieved by satisfying any one of those options:

Compliance with these SO₂ emission limitations and percent reduction requirements are determined on a 30-day rolling average basis. Fulfilling any one of the options listed under b. (2) g constitutes compliance with this subpart Da requirement.



Response: 40 CFR 60.43Da(a) only requires that the permittee comply with one of the emissions limitations specified in 60.43Da(a)(1) through(4), and does not require all 4 emissions limitations to be met. 40 CFR 60.43Da(i)(1) includes the clarifying word "either", which was not included in in 60.43Da(a). TES will add "either" to this term to clarify that not all 4 emissions limitations have to be met.

j. Comment: Page 33 of 141

Additional Terms and Conditions b. (2) s. i. and ii. which state the Subpart UUUUU requirements under 40 CFR Part 63 Mercury and Air Toxic Standards (MATS) should be deleted and replaced by simplified language stating the obligation to comply with the MATS rule itself.

1. The rules are presently under reconsideration and certain emission limits may change.
2. The rules are not an existing requirement since they do not take effect until April 16, 2015 and the demonstration of compliance is not required until October 13, 2015.
3. Should any of the limits listed in this permit change the entire permit will need to be revised by Ohio EPA.
4. Removing these references will streamline the permit but have no impact on the level of compliance that FE will need to meet related to MATS.

Response: As required by Engineering Guide #76, TES used the incorporation by reference detailed citation approach when drafting the permit for NSPS and MACT requirements. No change is recommended to be made.

k. Comment: Additional Terms and Conditions b. (2) s. i. (b) (ii) should be corrected by noting the emission limit applies to sulfur dioxide emissions. The emission limitation of 2.0E-1 lb/mmBtu or 1.5E0 lb/mWH is an alternate standard for SO₂.

Response: The correction will be made to add SO₂.

l. Comment: Page 34 of 141

Additional Terms and Conditions b. (2) s. ii. (b) (ii) should also be corrected to note that the emission limit applies to sulfur dioxide emissions.

Response: The correction will be made to add SO₂.

m. Comment: Page 43 of 141

d) Monitoring and Recordkeeping item (15) reference the 12/26/2006 Permit to Install. It is unclear what d)(1) through d)(6) are referring to, particularly since the 12/26/2006 PTI referenced does not appear to contain these items. There are additional references which we note throughout the rest of the draft Title V which also do not appear to match up with the PTI. Please clarify in revised permit



language.

Response: d)(1) through d)(6) refers to d)(1) through d)(6) of the draft Title V renewal permit. The term will be modified to add "of this Title V permit" after the d)(1) through d)(6) reference.

- n. Comment: e) Reporting Requirements (1) states *unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.*

FE has objected to this being a requirement which limits our legal means of delivery of required information. We do not object to the continued use of Air Services, which for the most part has worked effectively, but contend that the Agency has no legal right to limit our means of delivery of required documents. We would suggest that the language "approved by the Director" be expanded to include "district office or local air agency."

Response: On October 24, 2103, Ohio EPA modified the General Term and Condition regarding electronic reporting at Section A.30. Therefore, term e)(1) may be removed from the permit.

A.30 will read as follows:

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the [DO/LAA Long Name], and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

There were several other emissions units where a similar electronic reporting term was contained and will be removed, since the general reporting has been modified as indicated above.

- o. Comment Page 55 of 141

f) Testing Requirements (2) a., b. adds a new requirement to conduct a stack test on B006 for SO₂ should be deleted since B006 has a certified continuous emission monitor for SO₂. Conducting an SO₂ test is unnecessary as it is not



used to determine compliance with any of our emission limits.

In addition, the draft permit contains a provision to test for PM₁₀ no later than 2.5 years after the permit is issued but also requires PM and SO₂ to be tested within 6 months of the expiration dates of the permit. We have already requested that the SO₂ requirement be deleted. We also request that if the PM and PM₁₀ tests are required that we have the option to complete the test once during the life of the permit. Decoupling the tests will impose added costs for additional mobilization of a testing firm. Also for MATS compliance we may utilize the option of quarterly stack tests for total PM tests.

Response: The presence of an SO₂ CEMS does not waive the requirement to conduct stack testing when testing is recommended by Engineering Guide #16. However, Ohio EPA does allow for a RATA to serve as a compliance test under certain circumstances as discussed below.

40 CFR Part 75 requires the RATA be done at the most often used loading, which may not be 90-100% load as required for the compliance test. If you complete a RATA at 90-100% load, (3) 1-hr test runs may be conducted during the RATA to count as the stack test, and the remainder of the RATA runs would could be conducted for 21 minutes per run.

To allow flexibility, the testing deadline will be revised to allow for testing for all 3 pollutants to be conducted within 2 years prior to permit expiration.

p. **Comment:** Page 56 of 141

f) Testing requirements (2) d.states test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

As we noted on Page 25 of 141, this language is not in the previous Title V or the existing PTI and should be deleted since it allows Ohio EPA to reject a test if it feels it doesn't meet some unspecified criteria. Our emission tests are based on Ohio EPA's Engineering Guide 17 so the above language is unnecessary and should be deleted.

Response: This is the standard language for stack testing requirements contained in Ohio EPA's Permit Library of Terms and Conditions. However, this term will be modified as follows.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.



- q. Comment: 3. F001, Roads and Parking
Page 63 of 141

d) Monitoring and/or Recordkeeping Requirements (1)stating "*After the permittee has performed weekly*" appears to be in error and should be "daily" to be consistent with the requirements noted.

Response: The requested correction will be made.

- r. Comment: 4. F003, Coal Pile
Page 69 of 141

d) Monitoring and Recordkeeping Requirements (4)states the minimum inspection frequency which should be amended to read "daily, when a coal pile is present."

Response: The requested change will be made.

- s. Comment: 7. F008, Coke Storage
Page 83 of 141

b) (2) Additional Terms and Conditions d.states *The operator shall avoid dragging any front-end loader bucket along the ground. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.*

This requirement was not contained in the original PTI or in the previous Title V permit and is an arbitrary and unnecessary requirement that should be deleted from the permit. The front end loader is used to load petcoke and whether the bucket contacts the ground or not does not affect the emissions from the source.

Response: This requirement was contained in Section C.1.b)(2)d. of PTI P0109770 issued on 4/17/2012 for emissions unit F008, however, an Administrative PTI Modification (P0116104) was issued 1/29/2014 that includes the requested change, and the requested change will be incorporated into the Title V permit renewal.

- t. Comment: On Page 77 of the existing Title V permit the following language appears:

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements. (Authority for term: OAC rule 3745-77-07(C)(I))

We are requesting that the above language be included in this Title V permit.

Response: At the company's request, a tiered monitoring frequency will be added to the permit that will go from daily to weekly after 30 days of seeing no VEs, and then it would revert back to daily if VEs were observed.



- u. Comment: 8. F010, Limestone Crushing & Sizing Operation
Page 96 of 141

f) Testing Requirements requiring a Method 5 test to be conducted on this emissions source is unnecessary and should be deleted. The initial compliance test required by 40 CFR Part 60.8 has already been completed and the plant is conducting daily visual inspections to ensure ongoing compliance.

Response: TES discussed this issue with permittee and Ohio EPA has determined that the permit terms will be revised to require particulate emission testing at the limestone receiving hopper, limestone silo feeder conveyor filter, and the auxiliary dust collector stack.

- v. Comment: f) Testing Requirements (2) d. should also be deleted, as we noted previously in these comments.

Response: The testing requirement will be revised as in B006.

- w. Comment: 9. F012 Bed Ash Truck Load-out Station
Page 110 of 141

f) Testing Requirements 1.e) referring to the Applicable Compliance Method states a 100% capture efficiency will be used. This reference should be changed to 99% in order to be consistent with the compliance calculation.

Response: The compliance method will be revised to indicate that a 91% capture efficiency is assumed based on the initial PTI application that assumed a 90% overall control efficiency and 99% baghouse control efficiency.

- x. Comment: 10. F014 Coke Truck Load-out at Transfer House #1
Page 112, 113 of 141

Page 94 of the existing Title V permit contains the following language:

The permittee may, upon receipt of written approval from the Toledo Division of Environmental Services, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements. (Authority for term: PTI 04-01056)

We are requesting that the above term be added to the revised Title V permit under d) Monitoring and/or Recordkeeping Requirements.

Response: At the company's request, a tiered monitoring frequency will be added to the permit.

- y. Comment: 13. Emissions Unit Group X001: B002, B003, B004
Page 121 of 141



Under the description of the various units we are requesting that the term "maximum" be replaced with "nominal."

Response: The requested change will be made.

z. Comment: Page 123 of 141

The comments provided for B006 concerning compliance with 40 CFR Part 63 MATS are also incorporated into our comments for Emissions Unit Group X001.

Response: See response provided for B006

aa. Comment: Page 137 of 141

f) Testing Requirements (2) should be modified to add the following language. "If the Emission Units are idled testing will be required within 6 months of startup." Also the requirement for an SO₂ stack test should be deleted as these units are monitored using CEMs for SO₂ so it is unnecessary to complete a stack test to determine compliance with the existing SO₂ emission rate.

Response: The term will be modified to add the requested clarification for if an emissions unit is idled, then testing will be required at that emissions unit within 6 months of startup.

As discussed above for B006, the presence of an SO₂ CEMS does not waive the requirement to conduct stack testing when testing is recommended by Engineering Guide #16. However, Ohio EPA does allow for a RATA to serve as a compliance test under certain circumstances as discussed below.

40 CFR Part 75 requires the RATA be done at the most often used loading, which may not be 90-100% load as required for the compliance test. If you complete a RATA at 90-100% load, (3) 1-hr test runs may be conducted during the RATA to count as the stack test, and the remainder of the RATA runs would need to be conducted for 21 minutes per run.

2. Topic: Comments from U.S. EPA

a. Comment: On page 27 of 141, the draft permit includes Carbon Monoxide (CO) emission

limitations for Emission Unit (EU) B006. The draft permit states in subsection "2.b)(1)a." that the CO emissions shall not exceed 278.6 lbs/hr as a rolling, 3-hour average, except during periods of startup and shutdown. The previous Title V permit, issued 11/19/04, stated that the CO emissions shall not exceed 278.6 lbs/hr at any load. Please provide background to justify the change in requirement. If this requirement originated as a best available control technology limitation, the facility must be in compliance with it at all times, including during startup and shutdown.

Response: On 11/16/2006 a draft Permit to Install modification was issued for PTI permit number 04-01056, followed by final issuance of the Permit to Install modification



on 12/26/2006. A Title V Minor Permit Modification was issued on 4/4/2007. The 2006 Permit to Install modification revised CO emissions limitations to be based on 278.6 lbs/hr as a rolling, 3-hour average, except during periods of startup and shutdown. During periods of startup and shutdown, the permittee is still required to comply with the applicable lb/mmBtu CO emissions limitations. No change is proposed to be made to this draft Title V permit renewal term.

- b. **Comment:** On page 28 of 141, the draft permit includes Organic Compounds (OC) emission limitations for EU B006. The draft permit does not include regular testing of OC. The compliance method listed is a one-time calculation using the hourly OC emission limitation and the maximum annual operating hours. This calculation does not demonstrate compliance with the limitation, as there are no variables related to actual production at the facility. Ohio Environmental Protection Agency should use test data and actual production rates to show that the facility is in compliance with the OC emission limitations.

Response: The annual compliance method has been revised to indicate that compliance will be based on multiplying the actual emission rate determined during the most recent emission test (lb/mmBtu) by the actual annual heat input to the emissions unit (mmBtu/yr) divided by 2,000 pounds per ton. Additional testing is not being added due to the low level of emissions.

- c. **Comment:** On page 87 of 141, the draft permit lists the testing requirements for EU F008. The fugitive Particulate Emission (PE) calculation for operation of vehicles on top of storage piles assumes 2080 hours/year as maximum operational hours. However, no restrictions appear in the operational restrictions section for EU F008 on page 84. Throughout the draft permit, 8760 is used as the maximum operational hours. Please verify if the calculation incorrectly assumes 2080 operating hours or if an operational restriction should be included for F008.

Response: An Administrative PTI modification was issued 1/27/2014 that revised the emissions calculation method to be based on 8,760 hrs/yr for operation of vehicles on top of storage piles and will be incorporated into the Title V renewal.

- d. **Comment:** On page 94 of 141, the draft permit lists the testing requirements for EU F010. EU F010 is controlled by a baghouse. The applicable compliance method describes the development of the emission limitation. This calculation only describes how the limitation was created. The calculation does not include any variables related to actual production at the facility. The calculations should use actual test data. Also, the calculation assumes 99.9 percent control efficiency from the main and auxiliary dust collectors. There are no monitoring or recordkeeping requirements to ensure proper operation of the dust collectors. A Bag Leak Detection System (BLDS) and recordkeeping requirements should be included in the permit for the dust collectors to ensure continuous compliance with PE limitations.

Response: The compliance method for the main and auxiliary dust collectors has been revised to indicate that compliance will be based on the lb/ton emission factors determined during the most recent emissions test demonstrating compliance along with the actual limestone throughput. Ohio EPA is not proposing to change the compliance method for the receiving hopper and silo, since Ohio EPA does not require a Method 5 test to be conducted at these units due to the low level of



emissions.

The permit for this emissions unit requires the permittee to conduct daily visible emissions checks for stack and fugitive emissions from this emissions unit, and considers these as adequate demonstration of ongoing compliance for this emissions unit. Ohio EPA does not consider a bag leak detection system to be necessary to demonstrate continuous compliance for this emissions unit.

- e. Comment: EU F011 uses a baghouse to control PE. The permit does not include monitoring or recordkeeping requirements for the baghouse. Determining compliance with PE limit associated with coke, limestone and fly ash conveying make the assumption that the baghouse efficiency is 99 percent. There is no testing requirement to verify the control efficiency of the baghouse nor is there any periodic monitoring of the baghouse to ensure that it is operating properly. A BLDS and recordkeeping requirements should be included in the permit for the dust collectors to ensure continuous compliance with PE limitations.

Response: The permit for this emissions unit requires daily visible emissions readings to be conducted. Ohio EPA considers the daily VE readings to be sufficient for determining proper operation of the fabric filter. Ohio EPA does not think it is necessary to require stack testing for control efficiency at this emissions unit.

- f. Comment: On page 106 of 141, the permit lists testing requirements for EU F011. The subsection "g." has the requirements for fly ash conveying. This section does not include the language that may require the facility to conduct compliance testing as it appears in subsections "f." and "h." The compliance testing language should be added to this section.

Response: The requested change will be made.

- g. Comment: EU F012 uses a fabric filter to comply with limitations for PE and Particulate Matter less than 10 microns (PM10). The calculation listed as the applicable compliance method assumes a 90 percent control efficiency for the fabric filter, however, there are no monitoring or recordkeeping requirements for the fabric filter to ensure proper operation or verification that the assumed control efficiency is being met. Testing of the fabric filter, a BLDS, and recordkeeping requirements should be included in the permit for the fabric filter to ensure continuous compliance with PE and PM10 limitations.

Response: The permit for this emissions unit requires daily visible emissions readings to be conducted on stack and fugitive emissions. Ohio EPA considers the daily VE readings to be sufficient for determining proper operation of the fabric filter. Ohio does not think that a BLDS is necessary for this emissions unit, and Ohio EPA does not think that the level of emissions from this emissions unit warrants a stack test to be conducted at this emissions unit.

- h. Comment: On page 110 of 141, the permit assumes that there is 100 percent capture efficiency for stack emissions from EU F012. The permit does not have any requirements to verify the capture efficiency of the fabric filter. This assumption should be verified regularly since the process is only partially enclosed.



Response: The compliance term in the draft permit was not intended to require a 100% capture efficiency. Rather, the term was written to show what that worst case stack emissions would be if there was 100% capture of the particulate emissions. However, to clear up the confusion, the estimated capture efficiency of 91% will be used. The 2.22 ton/yr PE limitation was based on an as estimated overall control efficiency of 90%. With a design control efficiency of 99% control, the capture efficiency is $90/99 = 91\%$ capture. This term will be revised to use an estimated 91% capture efficiency in the compliance method.

- i. Comment: In several places throughout the permit, the applicable compliance method uses calculations to determine compliance. While calculating emissions from a process can be an acceptable means to determine compliance with applicable limitations, the calculations in the permit all use maximum production values and AP-42 emission factors. The permit should use actual production data from the facility as well as any emission factors that were obtained by required testing.

Response: Several changes have been made to the draft permit terms that have incorporated actual production rate in calculations, and use of stack test data where available.



PRELIMINARY PROPOSED

**Division of Air Pollution Control
Title V Permit**

for

FirstEnergy Generation LLC, Bay Shore Plant

Facility ID:	0448020006
Permit Number:	P0105130
Permit Type:	Renewal
Issued:	4/8/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
FirstEnergy Generation LLC, Bay Shore Plant

Table of Contents

Authorization	1
A. Standard Terms and Conditions	2
1. Federally Enforceable Standard Terms and Conditions	3
2. Monitoring and Related Record Keeping and Reporting Requirements.....	3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance.....	6
4. Risk Management Plans	7
5. Title IV Provisions	7
6. Severability Clause	7
7. General Requirements	7
8. Fees.....	8
9. Marketable Permit Programs.....	8
10. Reasonably Anticipated Operating Scenarios	9
11. Reopening for Cause	9
12. Federal and State Enforceability	9
13. Compliance Requirements	9
14. Permit Shield	11
15. Operational Flexibility.....	11
16. Emergencies	11
17. Off-Permit Changes	12
18. Compliance Method Requirements	12
19. Insignificant Activities or Emissions Levels.....	13
20. Permit to Install Requirement.....	13
21. Air Pollution Nuisance	13
22. Permanent Shutdown of an Emissions Unit	13
23. Title VI Provisions	13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only	14
25. Records Retention Requirements Under State Law Only.....	14
26. Inspections and Information Requests	14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements.....	15
28. Permit Transfers	15



29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	15
30. Submitting Documents Required by this Permit	16
B. Facility-Wide Terms and Conditions.....	17
C. Emissions Unit Terms and Conditions	21
1. B005, Gas Turbine.....	22
2. B006, Circulating Fluidized Bed Boiler	27
3. F001, Roads and Parking	61
4. F003, Coal Pile	66
5. F004, Coal Handling	72
6. F005, Ash Handling	76
7. F008, Coke Storage.....	81
8. F010, Limestone Crushing & Sizing Operation.....	88
9. F011, Transferring & Conveying Operation	96
10. F012, Bed Ash truck loadout Station	104
11. F014, Coke Truck Load-out at Transfer House #1	108
12. P001, Limestone Dryer	112
13. Emissions Unit Group - X001: B002, B003, B004,	118



Preliminary Proposed Title V Permit
FirstEnergy Generation LLC, Bay Shore Plant
Permit Number: P0105130
Facility ID: 0448020006
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0448020006
Facility Description: Power plant
Application Number(s): A0037439, A0037996
Permit Number: P0105130
Permit Description: Title V Renewal for coal and petroleum coke-fired power plant.
Permit Type: Renewal
Issue Date: 4/8/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0088525

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

FirstEnergy Generation LLC, Bay Shore Plant
4701 Bay Shore Road
Oregon, OH 43616-0000

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Toledo Department of Environmental Services. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Preliminary Proposed Title V Permit
FirstEnergy Generation LLC, Bay Shore Plant
Permit Number: P0105130
Facility ID: 0448020006
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))



- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:



Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Toledo Department of Environmental Services. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Toledo Department of Environmental Services by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations



from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Toledo Department of Environmental Services unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.



(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))



10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible



Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Toledo Department of Environmental Services concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Toledo Department of Environmental Services) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.



- b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Toledo Department of Environmental Services with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Toledo Department of Environmental Services as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.



This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Toledo Department of Environmental Services.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Toledo Department of Environmental Services. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine



whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Toledo Department of Environmental Services in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Toledo Department of Environmental Services must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



Preliminary Proposed Title V Permit
FirstEnergy Generation LLC, Bay Shore Plant
Permit Number: P0105130
Facility ID: 0448020006

Effective Date: To be entered upon final issuance

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Toledo Department of Environmental Services, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Preliminary Proposed Title V Permit
FirstEnergy Generation LLC, Bay Shore Plant
Permit Number: P0105130
Facility ID: 0448020006
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. The emission control action programs, as specified in OAC rule 3745-25-04, shall be developed and submitted within 30 days after receiving notification from the Ohio EPA.

[OAC rule 3745-25-03]
3. The permittee shall ensure that any emissions unit(s) subject to the Clean Air Interstate Rule (CAIR) complies/comply with the requirements of the Ohio Administrative Code (OAC) Chapter 3745-109, which includes submitting timely permit applications.

[OAC rule 3745-77-07(A)(5)]
4. All asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements specified in 40 CFR Part 61, Subpart M.

[40 CFR Part 61, Subpart M]
5. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart Da: B006. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gov> or by contacting the Toledo Division of Environmental Services.
6. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart OOO: F010. The complete NSPS requirements, including the NSPS General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gov> or by contacting the Toledo Division of Environmental Services.
7. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart ZZZZ: P003, P004, P005, and P006. The complete NESHAP requirements, including the NESHAP General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gov> or by contacting the Toledo Division of Environmental Services.
8. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart UUUUU: B002, B003, B004, and B006. The complete NESHAP requirements, including the NESHAP General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gov> or by contacting the Toledo Division of Environmental Services.
9. The Toledo Division of Environmental Services has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions units B002, B003, B004, and B006. The permittee shall comply with the provisions of the plan (as specified in Section C - Emissions Unit Terms and Conditions) during any operation of the aforementioned emissions units.

Pursuant to 40 CFR 64.2(b), CAM will not apply to the MACT emission limitations or standards in 40 CFR Part 63, Subpart UUUUU, after the compliance date in that rule.



10. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21, and/or 40 CFR Part 60 or 63:

- F006 - (PTI 04-01056) - coke truck dump to coke storage pile;
- F007 - (PTI 04-01056) - coke rail car unloading to coke storage pile;
- F009 - (PTI 04-01056) - limestone truck dump;
- F013 - (PTI 04-01056) –CFB fly ash truck load-out station;
- F015 - (PTI 04-01056) - coke truck load-out station from the coke storage pile;
- F016 - (PTI 04-01056) - coke/coal crushing and sizing operation;
- F017 - (PTI 04-01056) - emergency limestone storage pile;
- F018 - (PTI 04-01056) - emergency ash storage pile;
- F019 - (PTI 04-01056) - rail car load-out from skid mounted rail car feeder;
- G002 - (PBR02386) - Gasoline dispensing facility < 120,000 gallons throughput
- P002 - (PBR02387) - Portable non-metallic mineral processing plant;
- P003 –(PBR07449) - 162 HP (100 kW)emergency electrical generator (Propane Generator #2); and
- T002 (PTI 04-752) - 12,000-gallon above-ground sulfuric acid storage tank (Tank #2).

11. The following insignificant emissions units at this facility are exempt from permitting requirements because they are not subject to any applicable requirements or because they meet the de minimis criteria established in OAC rule 3745-15-05.

- P004 – 85 kW emergency electrical generator (Propane Generator #1) [OAC rule 3745-15-05(B)]
- P005 - 330 HP (2.4 mmBtu/hr) emergency fire water pump diesel engine (Diesel Engine #1) [OAC rule 3745-15-05(D)]
- P006 - 300 HP (2.18 mmBtu/hr) combustion turbine starter diesel engine (Diesel Engine #2) [OAC rule 3745-15-05(D)]
- T001 - 50,000 gallon fixed roof storage tank (Tank No. 2) [OAC rule 3745-15-05(B)]
- T003 - 15,228 gallon fixed roof fuel oil storage tank (Tank #3) [OAC rule 3745-15-05(B)]
- T004 - 15,228 gallon fixed roof fuel oil storage tank (Tank #4) [OAC rule 3745-15-05(B)]



Preliminary Proposed Title V Permit
FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

T005 – 3,475 gallon fixed roof fuel oil storage tank (Tank #5 Aboveground No. 1 Bulldozer Diesel Tank)
[OAC rule 3745-15-05(B)]

T006 - 1,000 gallon fixed roof fuel oil storage tank (Tank #7 Aboveground Diesel Tank - #2) [OAC rule
3745-15-05(B)]

T007 - 30,000 gallon fixed roof fuel oil storage tank (Tank #2 No. 2 fuel tank for light off of CFB) [OAC
rule 3745-15-05(B)]



Preliminary Proposed Title V Permit
FirstEnergy Generation LLC, Bay Shore Plant
Permit Number: P0105130
Facility ID: 0448020006
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. B005, Gas Turbine

Operations, Property and/or Equipment Description:

General Electric distillate oil-fired combustion turbine with a nominal heat input capacity of 283.5 mmBtu/hr

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	see b)(2)a.
b.	OAC rule 3745-17-11(B)(4)	particulate emissions (PE) shall not exceed 0.040 pound per million Btu of actual heat input
c.	OAC rule 3745-18-54(V)(2)	sulfur dioxide (SO ₂) emissions shall not exceed 0.4 pound per million Btu of actual heat input
d.	OAC rule 3745-110-02	see b)(2)b.
e.	40 CFR Part 63, Subpart YYYY (40 CFR 63.6090(b)(4))	This emissions unit is an existing stationary combustion turbine and is not required to meet the requirements of 40 CFR Part 63, Subparts A and YYYY.

(2) Additional Terms and Conditions

a. Except as provided in OAC rule 3745-17-07(A)(3), visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except:

i. visible particulate emissions may exceed 20 percent opacity, as a six-minute average, for not more than six consecutive minutes in any 60 minutes; but

ii. shall not exceed 60 percent opacity, as a six-minute average, at any time; and



- iii. the presence of uncombined water shall not be deemed a violation for failure of stack emissions meeting this requirement.
- b. This existing source is not subject to this rule since Lucas County is not listed under OAC rule 3745-110-02(A)(1)(b).
- c) **Operational Restrictions**
 - (1) The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in this permit.

[OAC rule 3745-77-07(A)(1)]
- d) **Monitoring and/or Recordkeeping Requirements**
 - (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1)]
 - (2) The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below:
 - a. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the fuel oil type



(number 2, 4, or 6), the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

- b. The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

[OAC rules 3745-18-04(E)(3) and 3745-18-04(I)]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)(c)]



- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following: any exceedance of the allowable sulfur dioxide emission limitation(0.4 pound sulfur dioxide per million Btu actual heat).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), and OAC rule 3745-77-07(C)(1)]

- (3) Not later than 14 days prior to the proposed test date(s), the permittee shall provide notification to the Toledo Division of Environmental Services (TES) of the date and time of each annual black start test of this emissions unit to allow for TES to conduct visible emissions observations at this emissions unit. This reporting requirement will terminate upon written notification by TES that TES has successfully conducted visible emissions observations of this emissions unit while in operation.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Except as provided in OAC rule 3745-17-07(A)(3), visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except visible particulate emissions may exceed 20 percent opacity, as a six-minute average, for not more than six consecutive minutes in any 60 minutes; but shall not exceed 60 percent opacity, as a six-minute average, at any time.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)]

b. Emission Limitation:

PE shall not exceed 0.040 pound per million Btu of actual heat input

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using Method 5 of 40 CFR Part 60, Appendix A to determine particulate emissions. The heat content of fuels shall be determined according to ASTM D240-02. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

[OAC rule 3745-77-07(C)]



c. Emission Limitation:

sulfur dioxide emissions shall not exceed 0.4 pound per million Btu of actual heat input

Applicable Compliance Method:

Continuous compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received, or each daily composite sample of the oil burned during each calendar day, meets the limitation.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

[OAC rule 3745-18-04(E) and OAC rule 3745-77-07(C)]

g) Miscellaneous Requirements

(1) None.



2. B006, Circulating Fluidized Bed Boiler

Operations, Property and/or Equipment Description:

Circulating fluidized bed (CFB) boiler fired primarily with petroleum coke (1736 MMBtu/hr rating) and use of coal (1764 MMBtu/hr rating) as a backup fuel, controlled by a fabric filter

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.

- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01056 issued 12/26/2006)	carbon monoxide (CO) emissions shall not exceed 0.28 lb/MMBtu actual heat input at half load as a rolling, 3-hr average (i.e., equal to 979 MMBtu/hr) CO emissions shall not exceed 0.20 lb/MMBtu actual heat input between three-quarter load and full load as a rolling, 3-hr average (i.e., equal to or greater than 1393.4 MMBtu/hr but less than 1764 MMBtu/hr) CO emissions shall not exceed 0.13 lb/MMBtu actual heat input at full load as a rolling, 3-hr average (i.e., equal to 1764 MMBtu/hr) CO emissions shall not exceed 278.6 lbs/hr as a rolling, 3-hour average, except during periods of startup and shutdown CO emissions shall not exceed 1220 tons/yr as a rolling, 12-month summation of the monthly emissions nitrogen oxides (NOx) emissions shall not exceed 0.20 lb/MMBtu actual heat input on a 30-day rolling average basis



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>NOx emissions shall not exceed 529.3 lbs/hr on a 30-day rolling average basis</p> <p>NOx emissions shall not exceed 1546 tons/yr as a rolling, 12-month summation of the monthly emissions</p> <p>particulate emissions (PE) shall not exceed 0.03 lb/MMBtu heat input</p> <p>99% reduction of PE</p> <p>particulate emissions (PE) shall not exceed 232 tons/yr</p> <p>particulate emissions less than or equal to 10 microns in diameter (PM10) shall not exceed 0.025 lb/MMBtu actual heat input</p> <p>PM10 emissions shall not exceed 193 tons/yr</p> <p>sulfur dioxide (SO₂) emissions shall not exceed 0.73 lb/MMBtu actual heat input on a 30-day rolling average basis and 90% reduction of SO₂, except that 70% reduction is allowable for all heat inputs less than 0.60 lb SO₂/mmBtu</p> <p>SO₂ emissions shall not exceed 1897.6 lbs/hr as a rolling, 3-hr average</p> <p>SO₂ emissions shall not exceed 5,541 tons/yr</p> <p>organic compound (OC) emissions shall not exceed 4.4 lbs/hr</p> <p>OC emissions shall not exceed 19.3 tons/yr</p> <p>see b)(2)a., b)(2)b., and b)(2)c.</p>
b.	OAC rules 3745-31-10 through 20 (PTI 04-01056 issued 12/26/2006)	see b)(2)e.
c.	OAC rule 3745-17-07(A)(1)	see b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-10(C)(1)	see b)(2)d.
e.	OAC rule 3745-18-54(A)	see b)(2)j.
f.	OAC rule 3745-110-02	see b)(2)t.
g.	40 CFR Part 60, Subpart Da (40 CFR 60.40Da – 60.52Da) [In accordance with 40 CFR 60.40Da(a) this emissions unit is an electric utility steam generating unit that is capable of combusting more than 73 megawatts (250 million Btu per hour) heat input of fossil fuel for which construction commenced after July 9, 1997, but before February 28, 2005 and is subject to the emissions limitations/control measures specified in this section]	see b)(2)f. through i.
h.	40 CFR Part 60, Subpart A (40 CFR 60.1 – 19)	see b)(2)k. through p.
i.	40 CFR Part 63, Subpart A (40 CFR 63.1 – 16)	Table 9 to Subpart UUUUU of 40 CFR Part 63 – Applicability of General Provisions to Subpart UUUUU shows which parts of the General Provisions in 40 CFR 63.1-16 apply.
j.	40 CFR Part 63, Subpart UUUUU (40 CFR 63.9980 – 63.10042) [In accordance with 40 CFR 63.9991, this emissions unit is an existing coal-fired (designed for coal with a heating value greater than or equal to 8,300 Btu/lb) and solid oil-derived fuel-fired electric utility steam generating unit (EGU)]	see b)(2)q., b)(2)r., and b)(2)s.
k.	40 CFR Part 64 [In accordance with 40 CFR 64.2(a), this emissions unit is a pollutant specific emissions unit located at a major source required to obtain a Title V permit, is subject to a particulate emission standard, uses a control device to achieve compliance with the emission standard, and has potential pre-	see d)(7), and d)(8) Pursuant to 40 CFR 64.2(b), CAM will not apply to the MACT emission limitations or standards in 40 CFR Part 63, Subpart UUUUU, after the compliance date in that rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	control device particulate emissions greater than 100 tons per year.]	

(2) Additional Terms and Conditions

- a. Firing coal generates the worst case emissions for CO, NO_x, PE, PM₁₀ and VOC. Firing coke generates the worst case emissions for SO₂.
- b. This is a base load emissions unit. Startup and shutdown periods for purposes of the hourly CO emissions limitation is defined as all periods of operation at less than 979 mmBtu per hour heat input.
- c. Compliance with the requirements of this rule includes compliance with the requirements of 40 CFR Part 60, Subpart Da.
- d. The emission limitation specified by this rule is less stringent than the emission limitation specified by 40 CFR Part 60, Subpart Da.
- e. The requirements of this rule are satisfied by complying with the CO emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
- f. The permittee shall not discharge from the stack serving this emissions unit, any gases which contain PE in excess of:
 - i. 13 ng/J (0.03 lb/MMBtu) heat input; and
 - ii. visible emissions from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.
- g. SO₂ emissions shall not exceed either:
 - i. 520 ng/J (1.20 lb/MMBtu) heat input and 10 percent of the potential combustion concentration (90 percent reduction);
 - ii. 30 percent of the potential combustion concentration (70 percent reduction), when emissions are less than 260 ng/J (0.60 lb/MMBtu) heat input;
 - iii. 180 ng/J (1.4 lb/MWh) gross energy output; or
 - iv. 65 ng/J (0.15 lb/MMBtu) heat input

Compliance with these SO₂ emission limitations and percent reduction requirements are determined on a 30-day rolling average basis.



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

- h. NOx emissions (expressed as NO₂) shall not exceed 200 ng/J (1.6 lb/MWh) gross energy output as determined on a 30-boiler operating day rolling average basis.
- i. The applicable PM emissions limit and opacity limit under 60.42Da, SO₂ emissions limit under 60.43Da, and NOx emissions limit under 60.44Da apply at all times except during periods of startup, shutdown, or malfunction.
- j. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- k. The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system, designed to ensure continuous valid and representative readings of opacity and compliance with 40 CFR Part 60, Appendix B, Performance Specification 1. The plan shall include, at a minimum, procedures for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring accurate operation of the continuous opacity monitoring system on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours. The permittee may keep these records electronically (on or offsite), provided the record can be made readily available when requested by Ohio EPA.

[40 CFR 60.13] and [40 CFR Part 60, Appendix B]

- l. The continuous opacity monitoring system consists of all the equipment used to acquire data and record opacity.

[40 CFR 60.2] and/or [40 CFR 63.2] and [Appendix B to 40 CFR Part 60]

- m. The permittee shall maintain written quality assurance/quality control plans for the continuous CO, NOx, and SO₂ monitoring systems, designed to ensure continuous valid and representative readings of CO, NOx and SO₂ emissions in units of the applicable standard(s). Except as allowed below, the plans shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plans and logbooks dedicated to the continuous CO, NOx and SO₂ monitoring systems must be kept on site and available for inspection during regular office hours. The permittee may keep these records electronically (on or offsite), provided the record can be made readily available when requested by Ohio EPA.

The plans shall include the requirement to conduct relative accuracy test audits for the continuous CO, NOx and SO₂ monitoring systems in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part



60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

The plans shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits pursuant to 40 CFR Part 60, and linearity checks pursuant to 40 CFR Part 75; however, linearity checks completed pursuant to 40 CFR Part 75, Appendix B, may be substituted for the quarterly cylinder gas or relative accuracy audits required per 40 CFR Part 60.

[40 CFR 60.13]; [40 CFR Part 60, Appendix F]; and [40 CFR Part 75]

- n. The permittee shall maintain a written quality assurance/quality control plan for the continuous CO₂ monitoring system, designed to ensure continuous valid and representative readings of CO₂ emissions in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous CO₂ monitoring system must be kept on site and available for inspection during regular office hours. The permittee may keep these records electronically (on or offsite), provided the record can be made readily available when requested by Ohio EPA.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous CO₂ monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits pursuant to 40 CFR Part 60, and linearity checks pursuant to 40 CFR Part 75; however, linearity checks completed pursuant to 40 CFR Part 75, Appendix B, may be substituted for the quarterly cylinder gas or relative accuracy audits required per 40 CFR Part 60.

[40 CFR 60.13]; [40 CFR Part 60, Appendix F]; and [40 CFR Part 75]

- o. The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

[40 CFR 60.2] and/or [40 CFR 63.2] and [Appendix F to 40 CFR Part 60]

- p. 40 CFR Part 60 subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.

- q. The permittee shall comply with the requirements of 40 CFR Part 63, Subpart UUUUU by no later than April 16, 2015.



- r. The permittee shall demonstrate that compliance has been achieved, by conducting the required performance tests and other activities, no later than October 13, 2015.
- s. The permittee shall comply with the following emission limitations specified in Table 2 to Subpart UUUUU:
 - i. when operating as a coal-fired EGU, the permittee shall comply with the following emission limitations:
 - (a) 3.0E-2 lb/MMBtu or 3.0E-1 lb/MWh filterable particulate matter (PM)

OR

5.0E-5 lb/MMBtu or 5.0E-1 lb/GWh total non-Hg HAP metals

OR

8.0E-1 lb/TBtu or 8.0E-3 lb/GWh antimony (Sb)

1.1E0 lb/TBtu or 2.0E-2 lb/GWh arsenic (As)

2.0E-1 lb/TBtu or 2.0E-3 lb/GWh beryllium (Be)

3.0E-1 lb/TBtu or 3.0E-3 lb/GWh cadmium (Cd)

2.8E0 lb/TBtu or 3.0E-2 lb/GWh chromium (Cr)

8.0E-1 lb/TBtu or 8.0E-3 lb/GWh cobalt (Co)

1.2 E0 lb/TBtu or 2.0E-2 lb/GWh lead (Pb)

4.0E0 lb/TBtu or 5.0E-2 lb/GWh manganese (Mn)

3.5E0 lb/TBtu or 4.0E-2 lb/GWh nickel (Ni)

5.0E0 lb/TBtu or 6.0E-2 lb/GWh selenium (Se)
 - (b) 2.0E-3 lb/MMBtu or 2.0E-2 lb/MWh hydrogen chloride (HCl) or;

2.0E-1 lb/mmBtu or 1.5E0 lb/MWh SO₂
 - (c) 1.2 E0 lb/TBtu or 1.3E-2 lb/GWh mercury (Hg)
 - ii. When operating as a solid oil-derived fuel-fired unit, the permittee shall comply with the following emission limitations:
 - (a) 8.0 E-3 lb/MMBtu or 9.0E-2 lb/MWh filterable particulate matter (PM)



OR

4.0E-5 lb/MMBtu or 6.0E-1 lb/GWh total non-Hg HAP metals

OR

8.0E-1 lb/TBtu or 7.0E-3 lb/GWh antimony (Sb)

3.0E-1 lb/TBtu or 5.0E-3 lb/GWh arsenic (As)

6.0E-2 lb/TBtu or 5.0E-4 lb/GWh beryllium (Be)

3.0E-1 lb/TBtu or 4.0E-3 lb/GWh cadmium (Cd)

8.0E-1 lb/TBtu or 2.0E-2 lb/GWh chromium (Cr)

1.1E0 lb/TBtu or 2.0E-2 lb/GWh cobalt (Co)

8.0E-1 lb/TBtu or 2.0E-2 lb/GWh lead (Pb)

2.3E0 lb/TBtu or 4.0E-2 lb/GWh manganese (Mn)

9.0E0 lb/TBtu or 2.0E-1 lb/GWh nickel (Ni)

1.2E0 lb/TBtu or 2.0E-2 lb/GWh selenium (Se)

(b) 5.0E-3 lb/MMBtu or 8.0E-2 lb/MWh hydrogen chloride (HCl) or;

3.0E-1 lb/mmBtu or 2.0E0lb/MWh SO₂

(c) 2.0E-1 lb/TBtu or 2.0E-3 lb/GWh mercury (Hg)

t. This existing source is not subject to this rule since Lucas County is not one of the counties listed under OAC rule 3745-110-02(A)(1)(b).

c) Operational Restrictions

(1) The use of number 2 fuel oil shall be permitted for the start-up and shutdown of this emissions unit and during periods of emissions unit operation at lower loads when it is needed for flame stabilization. This emissions unit shall comply with the allowable emission limitations when firing number 2 fuel oil except as otherwise provided for in b)(1)a. for CO emissions during periods of startup and shutdown.

[OAC rule 3745-77-07(A)(1) and PTI 04-01056]

(2) The quality of the number 2 fuel oil fired in this emissions unit shall have a sulfur content of no greater than 0.5% by weight and shall be sufficient to comply with the SO₂ allowable emission limitation of 0.73 lb/MMBtu actual heat input.

[OAC rule 3745-77-07(A)(1) and PTI 04-01056]



- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart UUUUU, including the following sections:

63.9991(a)(1)	meet at all times each emission limit and work practice standard in Tables 1 through 3, except as provided in 63.10009
63.9991(a)(2)	meet at all times each operating limit in Table 4
63.9991(b)	administrator may approve alternative to work practice standards
63.10000(a)	must be in compliance with applicable emission limits and operating limits at all times except during periods of startup and shutdown, and required to meet Table 3 work practice requirements during periods of startup and shutdown
63.10000(b)	must operate and maintain affected source, including associated air pollution control equipment and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions
63.10000(h)	requirements for an emissions unit that does not meet the definition of an EGU subject to this subpart on 4/16/2015 and later commences operation that causes the emissions unit to meet the definition of EGU in this subpart
63.10000(f), (g), (i), (j)	requirements following last date the unit met the definition of an EGU

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA's Central Office verifying that the continuous opacity monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter/document of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request. The permittee may keep these records electronically (on or offsite), provided the record can be made readily available when requested by Ohio EPA.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.



[OAC rule 3745-77-07(C)(1), 40 CFR 60.13, and 40 CFR Part 60, Appendix B]

- (2) The permittee shall operate and maintain the continuous opacity monitoring system to continuously monitor and record the opacity of the particulate emissions from this emissions unit. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

The permittee shall maintain records of data obtained by the continuous opacity monitoring system including, but not limited to:

- a. percent opacity on an instantaneous (one-minute) and 6-minute block average basis;
- b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- c. hours of operation of the emissions unit, continuous opacity monitoring system, and control equipment;
- d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous opacity monitoring system;
- e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous opacity monitoring system; as well as,
- f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13 and 40 CFR Part 60, Appendix B]

- (3) The permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous CO, NO_x, and SO₂ monitoring systems have been certified to meet the below requirements and have been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75.

- CO: 40 CFR Part 60, Appendix B, Performance Specification 4 or 4a (as appropriate), and the accuracy requirements of Specification 6
- NO_x 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6, and 40 CFR 60.49Da(w)
- SO₂ 40 CFR Part 60, Appendix B, Performance Specification 2 and 6, and 40 CFR 60.49Da(w).

The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request. The permittee may keep these records electronically (on or offsite), provided the record can be made readily available when requested by Ohio EPA.



Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 75]

- (4) The permittee shall operate and maintain equipment to continuously monitor and record CO, NO_x, and SO₂ emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60 and 40 CFR Part 75.

The permittee shall maintain records of data obtained by the continuous CO, NO_x, and SO₂ monitoring systems including, but not limited to:

- a. emissions of CO, NO_x, and SO₂ in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. emissions of CO in pounds per hour and pound per million Btu of actual heat input based on a rolling, 3-hour average basis;
- c. emissions of NO_x in pounds per hour (30-day rolling average), in pounds per million Btu of actual heat input (30-day rolling average), and pounds per megawatt-hour gross energy output based on a rolling (30-day rolling average);
- d. emissions of SO₂ in pounds per hour (hourly average basis), rolling, 3-hour average basis, pound per million Btu of actual heat input (30-day rolling average);
- e. results of quarterly cylinder gas audits or linearity checks;
- f. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- g. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- h. hours of operation of the emissions unit, continuous CO, NO_x, and SO₂ monitoring system, and control equipment;
- i. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous CO, NO_x, and SO₂ monitoring system;
- j. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous CO, NO_x, and SO₂ monitoring system; as well as,
- k. the reason (if known) and the corrective actions taken (if any) for each such event in (i) and (j).



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13, 40 CFR Part 60, Appendices B & F, and 40 CFR Part 75]

- (5) Using the hourly CO emissions data obtained by the continuous emissions monitoring system, the permittee shall calculate the monthly CO emissions in tons, and the annual CO emissions in tons per year as a rolling, 12-month summation of the monthly emissions.
- (6) The permittee shall maintain a log of the date, time and duration of all periods of startup and shutdown.
- (7) The permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous CO₂ monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 3; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request. The letter(s)/document(s) of certification may be maintained as an electronic record, and the electronic record may be maintained offsite, provided that the records can be made readily available to Ohio EPA personnel when requested.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 75]

- (8) The permittee shall operate and maintain equipment to continuously monitor and record the hourly average CO₂ emitted from this emissions unit in percent CO₂. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Parts 60 and Part 75.

The permittee shall maintain records of data obtained by the continuous CO₂ monitoring system including, but not limited to:

- a. the percent CO₂ with each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. results of quarterly cylinder gas audits or linearity checks;
- c. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- d. results of required relative accuracy test audit(s);
- e. hours of operation of the emissions unit, continuous CO₂ monitoring system;



- f. the date, time, and hours of operation of the emissions unit without the continuous CO₂ monitoring system;
- g. the date, time, and hours of operation of the emissions unit during any malfunction of the continuous CO₂ monitoring system; as well as,
- h. the reason (if known) and the corrective actions taken (if any) for each such event in (f) and (g).

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13, 40 CFR Part 60, Appendices B & F, and 40 CFR Part 75]

- (9) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for visible particulate emissions is the opacity of the visible emissions from the baghouse exhaust stack as measured and recorded by the certified continuous opacity monitoring (COM) system. The visible particulate emissions indicator range is each three-hour block average with an opacity value greater than 10%. The three-hour block average opacity shall be based on the one-minute values recorded in d)(2)a. When the opacity value over the averaging period of the indicator range is greater than 10%, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) shall be assessed and implemented as appropriate.

Upon detecting an excursion of the visible particulate emission indicator range listed above, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (10) After the compliance date specified in 40 CFR Part 63, Subpart UUUUU, the PM monitoring requirements specified in 40 CFR section 63.10010 may satisfy the monitoring requirements of 40 CFR Part 64 specified in d)(9), if the permittee chooses to comply with the PM emission limitation specified in Table 2 to 40 CFR Part 63, Subpart



UUUUU. Since the CAM requirements of 40 CFR Part 64 will continue to apply after the date specified in 40 CFR Part 63, Subpart UUUUU, the CAM plan shall be revised at such time to be consistent with the MACT monitoring requirements, if the permittee chooses to comply with PM emission limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (11) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart Da, including the following sections:

60.48Da(q)	monitor opacity according to 60.49Da(a)
60.48Da(s)	affirmative defense for exceedance of emissions limit during malfunction
60.49Da(a)	continuous opacity monitoring system (COMS) requirements
60.49Da(b)	SO ₂ continuous emissions monitoring system (CEMS) requirements
60.49Da(c)	NO _x CEMS requirements
60.49Da(d)	CEMS requirements when not complying with an output based limit
60.49Da(e)	CEMS operation requirements
60.49Da(f)	CEMS data supplement requirements for when minimum CEMS availability is not met
60.49Da(g)	1-hr averages under 60.13(h)
60.49Da(h)	CEMS data supplement methods and procedures
60.49Da(i)	CEMS performance evaluation methods and procedures
60.49Da(j)	alternative CEMS performance evaluation methods and procedures
60.49Da(k)	procedures for determining gross output
60.49Da(l)	continuous flow monitoring system requirements
60.49Da(m)	alternative Part 75 continuous flow monitoring system requirements



60.49Da(s)	monitoring system plan requirements
60.49Da(w)	SO ₂ , NO _x , CO ₂ , and O ₂ CEMS requirements

- (12) The permittee shall collect daily samples of the fuel (petroleum coke or coal) burned in this emissions unit. The individual samples for each day shall be collected from the hopper. The fuel sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. Alternative, equivalent methods may be used upon written approval from the Ohio EPA Central Office or Toledo Division of Environmental Services.

[OAC rule 3745-77-07(C)(1) and PTI 04-01056]

- (13) Each daily sample of fuel shall be analyzed for sulfur content (percent), and heat content (Btu/pound of fuel). The analytical methods for sulfur content and heat content shall be ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke; ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter; ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isooperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the Ohio EPA Central Office or Toledo Division of Environmental Services.

[OAC rule 3745-77-07(C)(1) and PTI 04-01056]

- (14) The permittee shall maintain daily records of the total weight of fuel burned, and the results of the analyses for sulfur and heat content.

[OAC rule 3745-77-07(C)(1) and PTI 04-01056]

- (15) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the fuel oil type (number 2, 4, or 6), the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.



[OAC rule 3745-77-07(C)(1) and PTI 04-01056]

- (16) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart UUUUU, including the following sections:

63.10000(d)	site specific monitoring plan requirements
63.10000(k)	monitoring systems necessary for newly applicable requirements resulting from cessation or recommencement of operations
63.10001, (a)	affirmative defense
63.10005(j)	startup and shutdown requirements
63.10007(f)	availability of performance test records
63.10010(a)	continuous monitoring system requirements for CEMS, PM CPMS, and sorbent trap monitoring systems
63.10010(b)	installation requirements for O ₂ and CO ₂ monitoring systems
63.10010(c)	flow monitoring requirements
63.10010(d)	moisture monitoring requirements
63.10010(e)	HCl and/or HF CEMS requirements
63.10010(f)	SO ₂ CEMS requirements
63.10010(g)	Hg CEMS or sorbent trap monitoring system requirements
63.10010(h)	PM CPMS requirements
63.10010(i)	PM CEMS requirements
63.10010(j)	HAP metals CEMS requirements
63.10020(a)	monitor and collect data according to site-specific monitoring plan required by 63.10000(d)
63.10020(b)	monitoring system operation and quality assurance or quality control activities
63.10020(c)	use of data collected



63.10020(d)	deviations from monitoring requirements
63.10021(h)	keep records specified in 63.10032 during periods of startup and shutdown
63.10032(a)	recordkeeping requirements
63.10032(b)	CEMS and CPMS recordkeeping requirements
63.10032(c)	keep records required in Table 7 including records of all monitoring data and calculated averages for applicable PM CPMS operating limits
63.10032(d)	monthly fuel usage records, combusting secondary materials, LEE records
63.10032(e)	emissions averaging records
63.10032(f)	startup and shutdown records
63.10032(g)	malfunction records
63.10032(h)	records of actions taken to minimize malfunction period emissions
63.10032(i)	records of type(s) and amount(s) of fuel used during each startup and shutdown
63.10033(a)	records must be in a form readily available for expeditious review
63.10033(b)	records retention
63.10033(c)	location of records

(17) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #04-01056, issued on 12/26/2006:d)(1) through d)(8) of this Title V Permit. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous opacity monitoring system:



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, and OAC rule 3745-17-07. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance.
- b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous opacity monitor;
 - iii. a description of any change in the equipment that comprises the continuous opacity monitoring system (COMS), including any change to the hardware, changes to the software that may affect COMS readings, and/or changes in the location of the COMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. the total operating time (hours) of the emissions unit;
 - vi. the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;
 - vii. the date, time, and duration of any/each malfunction** of the continuous opacity monitoring system, emissions unit, and/or control equipment;
 - viii. the date, time, and duration of any downtime** of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and
 - ix. the reason (if known) and the corrective actions taken (if any) for each event in (b)(vii) and (viii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* where no exceedance of the opacity limit has occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the quarterly EER report

** each downtime and malfunction event shall be reported regardless of whether there is an exceedance of the opacity limit



[OAC rule 3745-77-07(C)(1) and 40 CFR 60.7, PTI 04-01056]

- (2) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous CO, NO_x, and SO₂ monitoring systems:
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter, documenting all instances of CO, NO_x, and SO₂ emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, and OAC Chapter 3745-31. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
 - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous CO, NO_x, SO₂ and other associated monitors;
 - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. the total CO, NO_x, and SO₂ emissions for the calendar quarter (tons);
 - vi. the total operating time (hours) of the emissions unit;
 - vii. the total operating time of the continuous CO, NO_x, and SO₂ monitoring system while the emissions unit was in operation;
 - viii. results and dates of quarterly cylinder gas audits or linearity checks;
 - ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
 - x. unless previously submitted, the results of any relative accuracy test audit showing the continuous CO, NO_x, and SO₂ monitor out-of-control and the compliant results following any corrective actions;



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

- xi. the date, time, and duration of any/each malfunction** of the continuous CO, NO_x, and SO₂ monitoring system, emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime** of the continuous CO, NO_x, and SO₂ monitoring system and/or control equipment while the emissions unit was in operation;
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii);

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term OAC 3745-31-05(A)(3) rule-based or NSPS-based limitation(s) in this permit.

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

** each downtime and malfunction event shall be reported regardless of whether there is an exceedance of any applicable limit

[OAC rule 3745-77-07(C)(1), 40 CFR 60.7, 40 CFR Part 75]

- (3) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous CO₂ monitoring system:
 - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter, documenting all instances of continuous CO₂ monitoring system downtime and malfunction while the emissions unit was on line.
 - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous CO₂ and other associated monitors;
 - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

- iv. the total operating time (hours) of the emissions unit;
- v. the total operating time of the continuous CO₂ monitoring system while the emissions unit was in operation;
- vi. results and dates of quarterly cylinder gas audits or linearity checks;
- vii. unless previously submitted, results and dates of the relative accuracy test audit(s) (during appropriate quarter(s));
- viii. unless previously submitted, the results of any relative accuracy test audit showing the continuous CO₂ monitor out-of-control and the compliant results following any corrective actions;
- ix. the date, time, and duration of any/each malfunction* of the continuous CO₂ monitoring system while the emissions unit was in operation;
- x. the date, time, and duration of any downtime* of the continuous CO₂ monitoring system while the emissions unit was in operation; and
- xi. the reason (if known) and the corrective actions taken (if any) for each event in (b)(ix) and (x).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* each downtime and malfunction event shall be reported regardless of whether there is an exceedance of any applicable limit

[OAC rule 3745-77-07(C)(1), 40 CFR 60.7, and 40 CFR Part 75]

- (4) The permittee shall collect, record, and maintain measurements, data, records, and reports required per 40 CFR Part 75; and shall submit certification, recertification, notifications, applications, monitoring plans, petitions for alternative monitoring systems, electronic quarterly reports, and any other pertinent record and/or report to the Administrator (U.S. EPA), as required by this Part.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 75]

- (5) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

All days during which the quality of the number 2 fuel oil fired in this emissions unit had a sulfur content of greater than 0.5% by weight, or the quality was not sufficient to comply with the SO₂ allowable emission limitation of 0.73 lb/MMBtu actual heat input.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI 04-01056]



- (6) The permittee shall submit quarterly deviation (excursion reports that identify the following:

All periods during which the CO emissions exceeded 1,220 tons per year as a rolling, 12-month summation of the monthly emissions.

- (7) If the results of CAM monitoring or record keeping data indicate that the particulate emission limitations may have been exceeded when burning coal, the permittee shall submit the results of that data, and document any corrective action taken to restore operation of the emissions unit, or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (8) After the compliance date specified in 40 CFR Part 63, Subpart UUUUU, the reporting requirements specified in 40 CFR section 63.10031 may satisfy the reporting requirements of 40 CFR Part 64 specified in e)(7), if the permittee chooses to comply with the PM emission limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU. Since the CAM requirements of 40 CFR Part 64 will continue to apply after the date specified in 40 CFR Part 63, Subpart UUUUU, the CAM plan shall be revised at such time to be consistent with the MACT reporting requirements, if the permittee chooses to comply with PM emission limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (9) The permittee shall submit reports and other such notifications as are required pursuant to 40 CFR Part 60, Subpart Da, per the following sections:

60.48Da(s)	affirmative defense for exceedance of emissions limit during malfunction
60.51Da(a)	reporting performance test data from performance tests and from performance evaluation of continuous monitors
60.51Da(b)	SO ₂ and NO _x reporting
60.51Da(c)	reporting for when minimum quantity of emission data is not met
60.51da(e)	reporting for claim of fuel pretreatment credit toward the SO ₂ standard
60.51Da(f)	signed statement required when opacity, SO ₂ , or NO _x emissions data are not available



60.51Da(h)	signed compliance statement requirement
60.51Da(i)	reporting opacity levels in excess of standard
60.51Da(j)	semi-annual reporting requirement
60.51Da(k)	electronic quarterly reporting

- (10) The permittee shall submit reports and other such notifications as are required pursuant to 40 CFR Part 63, Subpart UUUUU, per the following sections:

63.9984(c)	meet notification requirements in 63.10030 according to schedule in 63.10030 and in 40 CFR Part 63, Subpart A some notifications are due prior to the April 16, 2015 compliance date
63.10000(i)(2)	notification requirements for when EGU will cease complying with this subpart
63.10001(b)	affirmative defense notification requirements
63.10005(k)	submit Notification of Compliance Status per 63.10030
63.10006(j)	report results of performance tests and performance tune-ups within 60 days after completion
63.11011(e)	submit Notification of Compliance Status containing the results of the initial compliance demonstration
63.10021(f)	reporting requirements
63.10021(g)	reporting deviations from an applicable operating limit or operating limit in Tables 1 through 4
63.10021(i)	submit reports specified in 63.10031 concerning activities and periods of startup and shutdown
63.10030(a)	submit all notifications in 63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply by the dates specified
63.10030(b)	Initial Notification submission deadline
63.10030(d)	Notification of Intent to conduct a performance test



	submittal requirement
63.10030(e)	Notification of Compliance Status submittal requirements
63.10031(a)	submit each report in Table 8 that applies, and, if you are required or elect to continuously monitor Hg and/or HCl, and/or HF emissions, submit the electronic reports required under Appendix A and/or B at the specified frequency
63.10031(b)	reporting schedule
63.10031(c)	compliance report content
63.10031(d)	compliance report content when using a CMS
63.10031(e)	semiannual monitoring report
63.10031(f)	requirements for submitting performance test results to EPA's WebFIRE database
63.10031(g)	malfunction compliance report requirements

(11) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 04-01056, issued on 12/26/2006: e)(1) through e)(6) of this Title V permit. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

CO emissions shall not exceed: 278.6 pounds per hour; 0.28 lb/mmBtu of actual heat input at half load; 0.20 lb/mmBtu of actual heat input between three-quarter load and full load; and 0.13 lb/mmBtu of actual heat input at full load, all based on a rolling, 3-hour average basis.

Applicable Compliance Method:

The CO continuous emissions monitoring data shall be used to demonstrate compliance with this emissions limitation. If required, the permittee shall



demonstrate compliance using Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

b. Emission Limitation:

CO emissions shall not exceed 1,220 tons per year as a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The permittee shall calculate and record the monthly CO emissions using the actual hourly emission rates recorded by the CO continuous emissions monitoring system for each month. The CO emissions for each month shall be added to the total CO emissions for the previous 11 months to determine the rolling, 12-month summation of CO emissions.

c. Emission Limitation:

NO_x emissions shall not exceed 0.20 lb/mmBtu actual heat input and 529.3 pounds per hour on a 30-day, rolling average basis.

Applicable Compliance Method:

The NO_x continuous emissions monitoring system data shall be used to demonstrate compliance with these emissions limitations.

d. Emission Limitation:

NO_x emissions shall not exceed 200 ng/J (1.6 lb/MWh) gross energy output.

Applicable Compliance Method:

Compliance shall be demonstrated according to the methods and procedures specified in 40 CFR 60.48Da(b), 60.48Da(d), 60.48Da(h), 60.48Da(i), 60.50Da(d).

e. Emission Limitation:

NO_x emissions shall not exceed 1,546 tons per year as a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The ton per year emission limitation was developed by multiplying the allowable NO_x lb/mmBtu emission limitation (0.20 lb/mmBtu) by the maximum heat input (1,764 mmBtu/hr when burning coal), multiplied by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the lb/mmBtu NO_x allowable emission limitation, compliance shall also be shown with the annual emission limitation.



f. Emission Limitation:

PE shall not exceed 0.03 lb/mmBtu actual heat input; PE shall not exceed 13 ng/J (0.03 lb/mmBtu) heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance according to 40 CFR 60.50Da(b). The permittee may use the methods specified in 40 CFR 60.50Da(e) as alternatives to the reference methods specified in 40 CFR 60.50Da(b).

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

g. Emission Limitation:

PE shall not exceed 232 tons per year.

Applicable Compliance Method:

If required, multiply the actual annual firing rate (mmBtu/yr) by the actual particulate emission rate determined during the most recent emissions test (lb/mmBtu), and divide by 2,000 pounds per ton.

h. Emission Limitation:

PM10 emissions shall not exceed 0.025 lb/mmBtu heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using Method 201 of 40 CFR Part 51, Appendix M.

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

i. Emission Limitation:

PM10 emissions shall not exceed 193 tons per year.

Applicable Compliance Method:

If required, multiply the actual annual firing rate (mmBtu/yr) by the PM10 emission rate determined during the most recent PM10 emissions test (lb/mmBtu), and divide by 2,000 pounds per ton.



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

j. Emission Limitation:

PE shall be reduced by 99 percent of the potential combustion concentration.

Applicable Compliance Method:

40 CFR 60.48Da(a) as it existed when PTI 04-01056 was issued specified that compliance with 0.03 lb/mmBtu constitutes compliance with the 99 percent reduction requirement. The 2012 update to this rule removed the 99% efficiency requirement from 40 CFR Part 60, Subpart Da, however, the same method for this limitation is being retained as demonstration of compliance with this emission limitation established pursuant to BAT.

k. Emission Limitation:

Visible stack emissions shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method:

Ongoing compliance with the opacity limitation contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Recordkeeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60.

The permittee shall be deemed in compliance with 40 CFR 60.42Da(b) and OAC rule 3745-17-07(A)(1) if less than 1.5 percent of nonexempt* 6-minute average opacity values during a calendar quarter exceed 20 percent opacity. (Historical continuous opacity monitoring data for coal-fired boilers equipped with electrostatic precipitators or baghouses indicate that an excess emissions level of 1.5 percent (nonexempt emissions) is representative of good operation and maintenance of the emissions unit and the associated control equipment).

*exempt emissions are defined in 40 CFR 60.42Da(b)

If required, the permittee shall demonstrate compliance using Method 9 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

[40 CFR 60.13, 40 CFR Part 60, Appendix B, and PTI 04-01056].

l. Emission Limitation:

SO₂ emissions shall not exceed 0.73 lb/mmBtu actual heat input on a 30-day rolling average basis.



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be demonstrated according to the methods and procedures specified in 40 CFR 60.48Da(b), 60.48Da(d), 60.48Da(h), and 60.50Da(c).

m. Emission Limitation:

SO₂ emissions shall be reduced by not less than 90% on a 30-day rolling average basis. SO₂ emissions shall be reduced by not less than 70% based on a 30-day rolling average basis, for all emission rates less than 0.60 lb/mmBtu.

Applicable Compliance Method:

Compliance shall be demonstrated according to the methods and procedures specified in 40 CFR 60.48Da(b), 60.48Da(e), 60.48Da(h), and 60.50Da(c).

n. Emission Limitation:

SO₂ emissions shall not exceed:

520 ng/J (1.20 lb/MMBtu) heat input and 10 percent of the potential combustion concentration (90 percent reduction);

30 percent of the potential combustion concentration (70 percent reduction), when emissions are less than 260 ng/J (0.60 lb/MMBtu) heat input;

180 ng/J (1.4 lb/MWh) gross energy output; or

65 ng/J (0.15 lb/MMBtu) heat input

Applicable Compliance Method:

Compliance shall be demonstrated according to the methods and procedures specified in 40 CFR 60.48Da(b), 60.48Da(d), 60.48Da(e), 60.48Da(h), and 60.50Da(c).

o. Emission Limitation:

SO₂ emissions shall not exceed 1897.6 lbs/hr on a rolling, 3-hour average basis.

Applicable Compliance Method:

The SO₂ continuous emissions monitoring system data shall be used to demonstrate compliance with this emissions limitation. If required, the permittee shall demonstrate compliance using Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

p. Emission Limitation:

SO₂ emissions shall not exceed 5,541 tons/yr.

Applicable Compliance Method:

The permittee shall calculate and record the monthly SO₂ emissions using the hourly emission rates recorded by the SO₂ continuous emissions monitoring system for each month. The SO₂ emissions for each month shall be added to the total SO₂ emissions for the previous 11 months to determine the rolling, 12-month summation of SO₂ emissions.

q. Emission Limitation:

OC emissions shall not exceed 4.4 lbs/hr.

Applicable Compliance Method:

Compliance may be determined by multiplying the VOC emissions factor determined during the most recent emission test that demonstrated compliance (lb/mmBtu) by the actual heat input to the boiler (mmBtu/hr).

If required, the permittee shall demonstrate compliance using Methods 1 through 4 and 25 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

r. Emission Limitation:

OC emissions shall not exceed 19.3 tons/yr.

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the VOC emission factor determined during the most recent emission test that demonstrated compliance (lb/mmBtu) by the actual annual heat input to the boiler (mmBtu/yr) divided by 2,000 pounds per ton. Method 25A testing conducted at this emissions unit in 2010 demonstrated an average VOC emission rate of 1.1E-04 lb/mmBtu.

[OAC rule 3745-77-07(C)(1)]

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 2 years prior to the permit expiration for PE, PM₁₀, and SO₂.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rates for:



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

PE: pound per million Btu actual heat input;

PM10: pound per million Btu actual heat input; and

SO₂: pounds per hour.

- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

PE: 40 CFR 60.50 Da(b)(1) or (e)

PM10: Method 201 of 40 CFR part 51, Appendix M

SO₂: Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A (lb/hr limit)

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. The permittee shall include continuous opacity monitoring data for time periods during which the above PE and PM10 testing was conducted in the written reports on the results of the emissions tests.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1)]



- (3) Ongoing compliance with the CO₂ monitoring requirements contained in this permit, 40 CFR Parts 60 and 75, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Recordkeeping Section of this permit; and demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13, 40 CFR Part 60, Appendices B & F, and 40 CFR Part 75]

- (4) The permittee shall comply with the applicable compliance requirements required under 40 CFR Part 63, Subpart UUUUU, including the following sections:

63.10000(c)(1)	initial performance testing requirements – testing is required for all pollutants to demonstrate compliance with applicable emission limits
63.10000(e)	perform periodic tune-ups according to 63.10021(e)
63.10005(a)	initial compliance demonstration requirements
63.10005(b)	initial performance testing requirements
63.10005(c)	establishing operating limits during initial compliance demonstration
63.10005(d)	CMS initial compliance demonstration requirements
63.10005(e), (f)	conduct performance tune-up according to 63.10021(e)
63.10005(h)	low emitting EGUs (LEE)
63.10006(a)	when using PM CPMS to monitor continuous performance, conduct testing according to Table 5 and 63.10007 at least every year
63.10006(b)	LEE repeat test frequency
63.10006(d)	HCl repeat testing requirements when the permittee does not use HCl CEMS to monitor compliance if an SO ₂ CEMS to monitor compliance with an alternate equivalent SO ₂ emission limit
63.10006(f)	repeat testing frequency requirements
63.10006(g)	repeat testing requirements when using emissions averaging compliance option



63.10006(h)	repeat testing requirements for when non-mercury LEE shows emissions greater than 50% of limit
63.10006(i)	if required to meet tune-up work practice standard, conduct performance tune-up according to 63.10021(e)
63.10007(a)	requirements for performance tests; conduct tests according to 63.7(d), (e), (f), and (h); and develop site-specific test plan according to 63.7(c)
63.10007(b)	conduct each performance test (including traditional 3-run test and 30-boiler operating day tests based on CEMS) according to Table 5
63.10007(c)	establishing operating limits when using PM CPMS
63.10007(d)	conducting performance tests
63.10007(e)	using performance testing to determine compliance with applicable Table 1 or 2 emission limits
63.10009(a)	emissions averaging compliance option
63.10009(b)	equations for EGU emissions averaging group
63.10009(c)	emissions averaging EGU groups venting to separate stacks
63.10009(d)	emissions averaging provisions for each EGU in the averaging group
63.10009(e)	emissions averaging compliance schedule
63.10009(f)	emissions averaging group eligibility demonstration
63.10009(g)	determining the weighted rolling average emissions rate
63.10009(h)	using a CEMS or sorbent trap to demonstrate compliance with emissions averaging
63.10009(i)	demonstrating compliance with emissions averaging through manual emission testing
63.10009(j)	emissions averaging plan
63.10009(k), (l), (m), (n)	emissions averaging with a common stack
63.10011(a)	demonstrate initial compliance with each emission



	limitation that applies by performance testing
63.10011(b)	establish an operating limit in accordance with Table 4 when using a PM CPMS
63.10011(c)(1)	initial performance test when using a CEMS or sorbent trap to measure HAP
63.10011(d)	deviations from the monitoring requirements
63.10011(f)	determine cleanest fuel for burning during startup and shutdown periods
63.10011(g)	follow startup and shutdown requirements in Table 3
63.10021(a)	demonstrate continuous compliance with each emissions limit, operating limit, and work practice standard in Tables 1 through 4 according to Tables 6 and 7 and 63.10021(b) through (g)
63.10021(b)	demonstration of compliance when using a CEMS to measure SO ₂ , PM, HCl, HF, or Hg emissions
63.10021(c)	demonstrating compliance when using a PM CPMS to measure compliance with an operating limit in Table 4
63.10021(d)	using quarterly stack testing to demonstrate compliance with one or more limits in Table 1 or 2
63.10021(e)	periodic performance tune-up requirements
63.10022(a)	continuous compliance provisions
63.10022(b)	continuous monitoring requirement deviations
63.10023(a)	recording PM CPMS output values during performance testing
63.10023(b)	determining PM CPMS operating limit
63.10023(c)	operate and maintain process and control equipment such that the 30 operating day average PM CPMS output does not exceed the operating limit



- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #04-01056, issued on 12/26/2006: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) None.



3. F001, Roads and Parking

Operations, Property and/or Equipment Description:

Roadways and parking lots

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0109173 issued 1/6/2012) Administrative Modification	particulate emissions (PE) shall not exceed 7.4 tons per year particulate matter emissions less than or equal to 10 microns in diameter (PM10) shall not exceed 1.6 tons per year there shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period there shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period see b)(2)a., and b)(2)d. through i.
b.	OAC rule 3745-17-07(B)(7)(a)(ii)	see b)(2)k.
c.	OAC rule 3745-17-08(B)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see b)(2)j.



(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B)(7)(a)(ii) and OAC rule 3745-17-08(B).
- b. The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

all paved roadways and all paved parking areas.
- c. The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

all unpaved roadways and unpaved parking areas.
- d. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by watering and sweeping at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas by chemical stabilization at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- g. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.



- h. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- i. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- j. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably available control measures requirements of OAC rule 3745-17-08(B).
- k. The emission limitation specified by this rule is equivalent to the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>roadways and parking areas</u>	<u>minimum inspection frequency</u>
all paved roads and parking areas	daily
all unpaved roads and parking areas	daily

After the permittee has performed daily inspections of the paved and the unpaved roadways and parking areas for one calendar quarter and no visible particulate emissions of fugitive dust have been observed, the permittee may begin inspections of the paved and the unpaved roadways and parking areas once per week. If visible particulate emissions of fugitive dust are observed during subsequent weekly inspections, the permittee shall return to an inspection frequency of once per day until no visible particulate emissions of fugitive dust are observed for another calendar quarter. All inspections shall be performed during representative, normal traffic conditions as stated in section d)(2).

[OAC rule 3745-77-07(C)(1)]

- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.



[OAC rule 3745-77-07(C)(1)]

- (3) The permittee may, upon receipt of written approval from the Toledo Division of Environmental Services, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspection would be sufficient to ensure compliance with the above-mentioned applicable requirements.

[OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

[OAC rule 3745-77-07(C)(1)]

- (5) The information required in d)(4)d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

[OAC rule 3745-77-07(C)(1)]

- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1)]



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

1.6 tons per year of fugitive PM10

7.4 tons per year of fugitive PE

Applicable Compliance Method:

Compliance with fugitive PE and PM10 limitations shall be determined by using the emission factor equations in Sections 13.2.1 (dated 1/11) and 13.2.2 (dated 11/06), in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 for paved roadways and unpaved roadways respectively. Should further updates in AP-42 occur, the most current equations for paved and unpaved roads shall be used taking into consideration an 80% control efficiency for watering paved roadways and a 50% control efficiency for watering unpaved roadways.

b. Emission Limitation:

No visible PE from paved roadways and parking areas except for a period of time not to exceed 6 minutes during any 60-minute observation period. No visible PE from unpaved roadways and parking areas except for a period of time not to exceed 13 minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

[OAC rule 3745-77-07(C)(1) and PTI P0109173]

g) Miscellaneous Requirements

(1) None.



4. F003, Coal Pile

Operations, Property and/or Equipment Description:

Coal storage piles including load-in by coal stacker, load-out by underground reclaimer, wind erosion, and operation of vehicles on top of the piles

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
load-in or load-out of coal storage piles (see b)(2)a. for identification of coal storage piles)		
a.	OAC rule 3745-17-07(B)(7)(b)	visible particulate emissions (PE) shall not exceed 20 percent opacity as a 3-minute average
b.	OAC rule 3745-17-08(B), (B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see b)(2)b., b)(2)c. and b)(2)g.
operation of vehicles on top of coal storage piles, excluding emissions from the combustion of fuels in such vehicles (i.e., pile working)		
c.	OAC rule 3745-17-07(B)(7)(c)	visible PE shall not exceed 20 percent opacity as a 3-minute average
d.	OAC rule 3745-17-08(B), (B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see b)(2)d., b)(2)f. and b)(2)g.
wind erosion from coal storage piles		
e.	OAC rule 3745-17-07(B)(7)(d)	no visible PE from any material storage pile except for a period of time not to exceed thirteen minutes during any sixty-minute observation period
f.	OAC rule 3745-17-08(B), (B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		see b)(2)e. through b)(2)g.

(2) Additional Terms and Conditions

- a. The coal storage piles that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

all coal storage piles at the plant.
- b. The permittee shall employ reasonably available control measures on all coal load-in and load-out operations associated with the coal storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall employ precautionary operating practices (i.e., minimize coal load-in if wind speeds appear to be excessive, minimize pile disturbance, etc.), use of a variable height stacker, and/or treat the coal load-in and load-out operations with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The above-mentioned control measures shall be employed for each coal load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures is unnecessary.
- d. The permittee shall employ reasonably available control measures on all pile working operations associated with the coal storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to employ precautionary operating practices and/or treat the pile working operations with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The permittee shall employ reasonably available control measures for wind erosion from pile surfaces associated with the coal storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to employ precautionary operating practices and/or treat the pile working operations with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph



shall prohibit the permittee from employing other control measures to ensure compliance.

- f. The above-mentioned control measures shall be employed for each pile working operation and wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measures shall not be necessary for a coal storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- g. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each coal load-in operation at each coal storage pile in accordance with the following frequencies:

coal storage pile identification: minimum coal load-in inspection frequency:

all coal storage piles at the plant daily when in use

[OAC rule 3745-77-07(C)(1)]

- (2) Except as otherwise provided in this section, the permittee shall perform inspections of each coal load-out operation at each coal storage pile in accordance with the following frequencies:

coal storage pile identification: minimum coal load-out inspection frequency:

all coal storage piles at the plant daily when in use

[OAC rule 3745-77-07(C)(1)]

- (3) Except as otherwise provided in this section, the permittee shall perform inspections of each pile working operation associated with each coal storage pile in accordance with the following frequencies:

coal storage pile identification: minimum coal pile working inspection frequency:

all coal storage piles at the plant daily when in use

[OAC rule 3745-77-07(C)(1)]



- (4) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each coal storage pile in accordance with the following frequencies:

coal storage pile identification: minimum wind erosion inspection frequency:

all coal storage piles at the plant daily, when a coal pile is present

[OAC rule 3745-77-07(C)(1)]

- (5) No inspection shall be necessary for wind erosion from the surface of a pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

[OAC rule 3745-77-07(C)(1)]

- (6) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for coal load-in or load-out of a storage pile, pile working operations, and wind erosion from the surface of a coal storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

[OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in (7)d. shall be kept separately for (i) the coal load-in operations, (ii) the coal load-out operations, (iii) the coal pile working operations, and (iv) the coal pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[OAC rule 3745-77-07(C)(1)]



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

[OAC rule 3745-77-07(C)(1)]

- (2) The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

visible PE shall not exceed 20% opacity for coal load-in or load-out of coal storage piles, as a 3-minute average

Applicable Compliance Method: If required, Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03 shall be used to demonstrate compliance.

b. Emission Limitation:

visible PE shall not exceed 20% opacity for pile working operations on top of coal storage piles, as a 3-minute average

Applicable Compliance Method:

If required, Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a), (B)(3)(b) and (B)(3)(e) of OAC rule 3745-17-03 shall be used to demonstrate compliance.



c. Emission Limitation:

no visible emissions except for 13 minutes during any 60-minute observation period for wind erosion from the coal storage pile surfaces

Applicable Compliance Method:

If required, Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03 shall be used to demonstrate compliance.

[OAC rule 3745-77-07(C)]

g) Miscellaneous Requirements

(1) None.



5. F004, Coal Handling

Operations, Property and/or Equipment Description:

Enclosed rotary railcar unloading, enclosed coal crusher, and enclosed coal transfer and conveying

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)(7)(b)	visible emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average
b.	OAC rule 3745-17-08(B), (B)(3)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see b)(2)b. through b)(2)d.

(2) Additional Terms and Conditions

a. The material handling operation(s) that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

rotary railcar coal unloading, coal crusher, coal transfer and conveying, and coal bunkers

b. The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

<u>material handling operation(s)</u>	<u>control measure(s)</u>
rotary railcar coal unloading	watering
coal crusher	enclosure



material handling operation(s)
 coal transfer & conveying

control measure(s)
 enclosure & rotoclones vented
 indoors

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- c. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- d. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section and for coal unloading stations that are not adequately enclosed, the permittee shall perform inspections of such coal unloading stations with the following frequencies:

<u>coal unloading station identification:</u>	<u>minimum inspection frequency:</u>
rotary railcar coal unloading	daily when in operation

[OAC rule 3745-77-07(C)(1)]

- (2) Except as otherwise provided in this section and for coal conveyors that are not adequately enclosed, the permittee shall perform inspections of such coal conveyors with the following frequencies:

<u>coal conveyor identification:</u>	<u>minimum inspection frequency:</u>
all coal conveyors at the plant	daily when in operation

[OAC rule 3745-77-07(C)(1)]

- (3) Except as otherwise provided in this section and for coal handling operations that are not adequately enclosed, the permittee shall perform inspections of such coal handling operations with the following frequencies:



The information in (8)d. shall be kept separately for (i) the coal unloading stations, (ii) the coal conveyors, (iii) the coal handling operations, and (iv) the coal transfer points, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency; and
 - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

visible emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average

Applicable Compliance Method:

If required, Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03 shall be used to demonstrate compliance.

[OAC rule 3745-77-07(C)]

g) Miscellaneous Requirements

- (1) None.



6. F005, Ash Handling

Operations, Property and/or Equipment Description:

Fly ash (from B002-B004) conveying to silos and loading into trucks, dredged bed ash (from B002-B004) handling and loading into trucks.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Fly ash pneumatic conveying from ESP to silos, fly ash silo vents controlled by fabric filter, and pneumatic dry fly ash truck loading		
a.	OAC rule 3745-17-07(A)(1)	visible particulate emissions from any stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule see b)(2)a.
b.	OAC rule 3745-17-08(B), (B)(3)	see b)(2)b. through b)(2)d., and b)(2)g.
c.	OAC rule 3745-17-07(B)(7)(b)	visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average
Fly ash truck loading (wet loading), dredged bed ash truck loading		
d.	OAC rule 3745-17-07(B)(7)(b)	visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average
e.	OAC rule 3745-17-08(B), (B)(3)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see b)(2)e. through b)(2)g.

(2) Additional Terms and Conditions

a. Per Engineering Guide #75, this limitation only applies when the 0.030 grain per dry standard cubic foot particulate emission limitation specified under OAC rule



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

3745-17-08(B)(3)(b) is less stringent than the no visible particulate emission limitation specified under OAC rule 3745-17-08(B)(3)(b).

- b. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirements:
 - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and
 - ii. the control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions (whichever is less stringent) from the exhaust stack of this emissions unit.
- c. The permittee shall employ reasonably available control measures on all fly ash pneumatic conveying equipment for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall maintain a total enclosure of such equipment vented to a fabric filter to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The permittee shall employ reasonably available control measures for operations employing pneumatic loading of fly ash from storage silos to trucks for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall use coaxial spouts or other mechanisms that tightly fit to the tank hatch of the truck to prevent leaks and vent the displaced air from the tank to the baghouse serving the vent of the storage silo to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The permittee shall employ reasonably available control measures for loading dredged bottom ash into trucks by clam shell crane for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall apply sufficient water to the dredged bottom ash during any loading into trucks to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. The permittee shall employ reasonably available control measures for gravity loading of fly ash from storage silos into trucks for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall employ a total enclosure and/or apply sufficient water to the fly ash during any load-out from storage silos to trucks to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.



[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible particulate emissions were observed from any stack serving this emission unit; and
- b. any corrective actions taken eliminate the visible emissions;
- c. all days during which any visible emissions of fugitive dust were observed from fly ash loading into trucks or from bottom ash loading into trucks; and
- d. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources").

b. Emission Limitation:

The controlled emissions from the stack shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible emissions from the exhaust stack.

Applicable Compliance Method:

If required, compliance with the requirement for no visible particulate emissions from the exhaust stack, identified in this permit, shall be determined in accordance with U.S. EPA Method 22. If opting to comply with the outlet particulate emissions rate, compliance with the 0.030 grain of particulate



emissions per dry standard cubic foot of exhaust gases from the stack shall be determined in accordance with U.S. EPA Methods 1 through 5, as appropriate.

c. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



7. F008, Coke Storage

Operations, Property and/or Equipment Description:

Coke storage piles including load-in, load-out and wind erosion

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0116104 Administrative Modification issued 1/29/2014)	particulate emissions (PE) shall not exceed 13.50 tons per year particulate matter less than or equal to 10 microns in diameter (PM10) emissions shall not exceed 3.88 tons per year see b)(2)a. and b)(2)c. through b)(2)i.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	see b)(2)b.
load-in and load-out of storage piles and operation of vehicles on top of coke storage piles, excluding emissions from the combustion of fuels in such vehicles (i.e., pile working)		
c.	OAC rule 3745-17-07(B)(7)(b)	visible PE of fugitive dust shall not exceed 20 percent opacity as a 3-minute average
d.	OAC rule 3745-17-08(B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see b)(2)d. through b)(2)f. and b)(2)i.
wind erosion from storage piles		
e.	OAC rule 3745-17-07(B)(6)	there shall be no visible particulate emissions from any material storage pile except for a period of time not to exceed 13 minutes during any 60-minute observation period



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-17-08(B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see b)(2)(g) through b)(2)i.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM10 emissions from this emissions unit since the uncontrolled potential to emit for PM10 is less than 10 tons per year. The BAT requirements of OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this emissions unit since, per ORC 3704.03(T), BAT only applies to pollutants having a National Ambient Air Quality Standard.

c. Compliance with this rule includes compliance with the requirements of OAC rule 3745-17-07(B)(6) and (B)(7)(b).

d. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to maintain minimal drop heights for stackers and front-end loaders, and chemical stabilization/dust suppressants and/or watering/sprinkling systems at sufficient treatment frequencies to ensure compliance.

e. The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-



mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.

- f. The permittee shall employ best available control measures on all pile working operations associated with the coke storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to employ precautionary operating practices and/or treat the pile working operations with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- g. The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the application, the permittee has committed to perform one or more of the following: (chemical stabilization, watering/sprinkling systems/hoses, covering the storage piles) to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- h. The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- i. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05(A)(3) and OAC rule 3745-17-08(B)(6).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
all coke piles	daily when in operation

[OAC rule 3745-77-07(A)(3)]



- (2) Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
all coke piles	daily when in operation

[OAC rule 3745-77-07(A)(3)]

- (3) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
all coke piles	daily

[OAC rule 3745-77-07(A)(3)]

- (4) No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

[OAC rule 3745-77-07(A)(3)]

- (5) After the permittee has performed weekly inspections of the storage piles for 30 days, and no visible emissions of fugitive dust have been observed, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission points by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily until such time as there are no visible particulate emissions for another 30 days.

[OAC rule 3745-77-07(A)(3)]

- (6) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

[OAC rule 3745-77-07(A)(3)]

- (7) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;



- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

[OAC rule 3745-77-07(A)(3)]

- (8) The information required in d)(7)d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(A)(3)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
13.50 tons/year of fugitive PE
Applicable Compliance Method:
If required, compliance with this emissions limitation may be determined by the following calculation.



Multiply the actual annual tons of coke received by the particulate emission factor calculated from Equation 1 of AP-42 Section 13.2.4 dated 11/06 (3.02E-04 lb/ton), multiply by 2 to account for load-in and load-out, and divide by 2,000 pounds per ton to determine the actual particulate emissions from load-in and load-out (ton per year).

Multiply the particulate emission factor calculated from Equation 4-9 of *Control of Open Fugitive Dust Sources* EPA-450-3-88-008 (6.05 lb/day/acre) by the number of days per year that a storage pile was present, multiply by the surface area of the storage pile (acres), and divide by 2,000 pounds per ton to determine the actual particulate emissions from wind erosion (tons/yr).

Multiply the bulldozing particulate emission factor calculated from AP-42 Table 11.9-1 dated 10/98 for overburden (1.97 lbs/hr) by the actual annual hours of operation (hrs/yr) and divide by 2,000 pounds per ton to determine the actual particulate emissions from operation of vehicles on top of the piles (tons/yr).

Sum the particulate emissions from load-in and load-out, wind erosion, and from operation of vehicles on top of the storage pile to determine the total particulate emissions from this emissions unit.

b. Emissions Limitation:

3.88 tons/year of fugitive PM10

Applicable Compliance Method:

If required, compliance with this emissions limitation may be determined by the following calculation.

Multiply the actual annual tons of coke received by the PM10 emission factor calculated from Equation 1 of AP-42 Section 13.2.4 dated 11/06 (1.43E-04 lb/ton), multiply by 2 to account for load-in and load-out, and divide by 2,000 pounds per ton to determine the actual PM10 emissions from load-in and load-out (tons per year).

Multiply the PM10 emission factor calculated from Equation 4-9 of *Control of Open Fugitive Dust Sources* EPA-450-3-88-008 (3.025 lb/day/acre) by the number of days per year that a coke storage pile was present, multiply by the surface area of the storage pile (acres), and divide by 2,000 pounds per ton to determine the actual PM10 emissions from wind erosion (tons/yr).

Multiply the bulldozing PM10 emission factor calculated from AP-42 Table 11.9-1 dated 10/98 for overburden (0.334 lbs/hr) by the actual annual hours of operation and divide by 2,000 pounds per ton to determine the actual PM10 emissions from operation of vehicles on top of the piles (tons/yr).

Sum the PM10 emissions from load-in and load-out, wind erosion, and from operation of vehicles on top of the storage pile to determine the total PM10 emissions from this emissions unit.



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

c. Emission Limitation:

There shall be no visible PE except for a period of time not to exceed thirteen minutes in any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

d. Emission Limitation:

Visible PE of fugitive dust shall not exceed 20 percent opacity as a 3-minute average.

Applicable Compliance Method:

If required, Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03 shall be used to demonstrate compliance.

[OAC rule 3745-77-07(C)]

g) Miscellaneous Requirements

(1) None.



8. F010, Limestone Crushing & Sizing Operation

Operations, Property and/or Equipment Description:

Limestone crushing and sizing and conveying operation with baghouse control

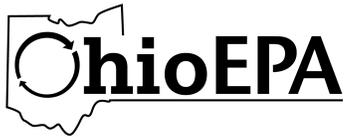
a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01056 issued 12/26/2006)	particulate emissions (PE) shall not exceed 14.2 tons per year particulate matter less than or equal to 10 microns in diameter (PM10) emissions shall not exceed 12.8 tons per year see b)(2)a.
b.	OAC rule 3745-17-07(A)(1)	see b)(2)f.
c.	OAC rule 3745-17-08(B)	see b)(2)f.
d.	40 CFR Part 60, Subpart OOO (40 CFR 60.670 – 60.676) [In accordance with 40 CFR 60.670(A)(1), this emissions unit is a fixed nonmetallic mineral processing plant with a crushing capacity of 50 tons per hour subject to the emissions limitations/control measures specified in this permit.]	see b)(2)b. through d.
e.	40 CFR 60.1 – 19 (40 CFR 60.670(f))	Table 1 to Subpart OOO of 40 CFR Part 60 - Exceptions to Applicability of Subpart A to Subpart OOO shows which parts of the General Provisions in 40 CFR 60.1-19 apply.



(2) Additional Terms and Conditions

- a. The requirements of this rule include compliance with the requirements of 40 CFR Part 60, Subpart OOO.
- b. The permittee shall not cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any stack emissions which:
 - i. contain particulate emissions in excess of 0.05 gram per dry standard cubic meter (0.022 grain per dry standard cubic foot); and
 - ii. exhibit greater than 7% opacity as a 6-minute average.

Any baghouse that controls emissions from only an individual, enclosed storage bin is exempt from the applicable stack PM concentration limit above, but must meet the applicable stack 7% opacity limit. This exemption from the stack PM concentration limit does not apply for multiple storage bins with combined stack emissions.

- c. There shall be no visible fugitive particulate emissions from any building enclosing any transfer point on a conveyor belt or any crushing and screening operation, except emissions from a vent as defined by 40 CFR Part 60.671. The permittee shall not cause to be discharged into the atmosphere from any building enclosing a transfer point on a conveyor belt or any crushing and screening operation which exceed the stack emission limitations in b)(2)b.i. and b)(2)b.ii.
- d. For conveyors that are not enclosed in a building, the permittee shall not cause to be discharged to the atmosphere from any transfer point on belt conveyors any fugitive emissions which exhibit greater than 10% opacity as a 6-minute average.
- e. The permittee shall not cause to be discharged into the atmosphere from any baghouse that controls emissions from only an individual, enclosed storage bin, stack emissions which exhibit greater than 7% opacity as a 6-minute average.
- f. The emission limitation(s) and/or control requirements established by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) The maximum annual hours of operation for this emissions unit shall not exceed 5840 hours, based upon a rolling, 12-month summation of the hours of operation.

[OAC rule 3745-77-07(A)(1) and PTI 04-01056]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks



and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-17-07(A) and(B)] or if TV [OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall maintain monthly records of the following information:

- a. The hours of operation for each month; and
- b. The rolling, 12-month summation of the hours of operation.

[PTI 04-01056]

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #04-01056, issued on 12/26/2006:d(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements



constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the hours of operation restriction in c)(1). The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
- b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
- c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)(c)]

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #04-01056, issued on 12/26/2006: d)(2) . The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

14.2 TPY PE



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

This emissions unit includes emissions from the limestone preparation building and from limestone transfer and conveying.

The emissions from the limestone preparation building include those from the main dust collector and from the auxiliary dust collector. Compliance with the annual particulate emissions limitation for Emissions unit F010 shall be determined as the sum of the annual emissions from all stacks associated with F010 (main dust collector, auxiliary dust collector, receiving hopper filter, limestone silo feeder conveyor, limestone silo vent filter, and limestone boiler feed day bins) according to the following series of calculations for the all stacks associated with F010.

Add the pound per hour particulate emissions rates determined during the most recent emissions test conducted on the main dust collector exhaust and auxiliary dust collector exhaust to determine the hourly emission rate from the limestone processing building. Multiply the particulate emission rate from the limestone processing building (lbs/hr) by the actual annual operating hours and divide by 2,000 pounds per ton to determine the annual particulate emissions from the limestone preparation building.

The limestone transferring and conveying emissions are calculated as the sum of the emissions from the: receiving hopper filter, limestone silo feeder conveyor filter, limestone silo vent filter, and the limestone boiler feed day bins.

Multiply the pound per hour particulate emissions rate determined during the most recent emissions test conducted on the receiving hopper filter exhaust by the actual annual hours of operation and divide by 2,000 pounds per ton to determine the annual emissions from the receiving hopper filter.

Multiply the controlled particulate emission factor from AP-42 Table 11.19.2-2 dated 8/04 for conveyor transfer point (0.00014 lb/ton), multiply by the actual annual limestone processing rate (tons/yr), and divide by 2,000 pounds per ton to determine the annual emissions from the limestone silo dust filter.

Multiply the actual annual limestone processing rate (tons/yr) by the controlled AP-42 particulate emission factor for conveyor transfer point from Table 11.19.2-2 dated 8/04 (0.00014 lb/ton), and divide by 2,000 pounds per ton to determine the controlled stack emissions from the limestone boiler feed day bins.

Add the controlled particulate emissions from the limestone receiving hopper filter, limestone silo feeder conveyor filter, limestone silo filter, the limestone processing building, and the limestone boiler feed silo filters to obtain the total controlled particulate emissions from this emissions unit.

If required, the permittee shall demonstrate compliance using Methods 1 through 5 of 40 CFR Part 60, Appendix A, and the actual annual limestone processing rate.



b. Emission Limitation:

12.8 tons per year PM-10

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the particulate emission rate determined according to f)(1)a. by the estimated decimal fraction of particulates emitted as PM10 (0.9). If required, the permittee shall demonstrate compliance using Method 201 of 40 CFR Part 60, Appendix A, and the actual annual limestone processing rate.

c. Emission Limitation:

7% opacity from stacks or vents

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated using Method 9 of 40 CFR Part 60, Appendix A and the procedures in 40 CFR Part 60.11 and 40 CFR Part 60.675.

d. Emission Limitation:

0.05 gram of PE/dscm or 0.022 grain of PE/dscf

Applicable Compliance Method:

If required, Methods 1 through 5 or Methods 1 through 4 and 17 shall be used to determine the particulate emission concentration. The sample volume shall be at least 1.70 dscm (60 dscf). For Method 5, if the gas stream being sampled is at ambient temperature, the sampling probe and filter may be operated without heaters. If the gas stream is above ambient temperature, the sampling probe and filter may be operated at a temperature high enough, but no higher than 121 degrees C (250 degrees F), to prevent water condensation on the filter.

e. Emission Limitation:

No visible fugitive emissions from the building except from the stacks and vents.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 22 and the procedures specified in 40 CFR 60.675.

f. Emission Limitation:

Visible fugitive emissions shall not exceed 10% opacity from any transfer point on belt conveyors that are not enclosed in a building.



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

Method 9 of 40 CFR Part 60, Appendix A and the procedures in 40 CFR Part 60.11, with the following additions contained in 40 CFR Part 60.675(c), as follows:

- i. The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet).
- ii. The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g., road dust). The required observer position relative to the sun (40 CFR Part 60, Appendix A, Method 9, Section 2.1) must be followed.
- iii. When determining compliance with the opacity of stack emissions from any baghouse that controls emissions only from an individual enclosed storage bin, using Method 9, the duration of the Method 9 observations shall be one hour (ten six-minute block averages).

[OAC rule 3745-77-07(C)]

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months of the effective date of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the stack particulate emission limitation of 0.05 gram per dry standard cubic meter (0.022 grain per dry standard cubic foot) from the following stacks: limestone receiving hopper filter, limestone silo feeder conveyor filter, and auxiliary dust collector exhaust.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR 60.675.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #04-01056, issued on 12/26/2006: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) None.



9. F011, Transferring & Conveying Operation

Operations, Property and/or Equipment Description:

Petroleum coke, limestone, CFB fly ash, and CFB bed ash transferring and conveying operations vented to a baghouse

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01056 issued 12/26/2006)	particulate emissions (PE) shall not exceed 12.0 tons per year particulate matter less than or equal to 10 microns in diameter (PM10) emissions shall not exceed 6.79 tons per year there shall be no visible emissions from any stack serving this emissions unit see b)(2)a., b)(2)c.
b.	OAC rule 3745-17-07(A)(1)	see b)(2)b.
c.	OAC rule 3745-17-07(B)(7)(b)	visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average
d.	OAC rule 3745-17-08(B)	see b)(2)b.
e.	OAC rule 3745-17-11(B)(1)	the combined PE from all stacks associated with coke conveying shall not exceed 3 pounds per hour the combined PE from all stacks associated with fly ash conveying shall not exceed 36 pounds per hour the combined PE from all stacks associated with bed ash conveying shall not exceed 14 pounds per hour



(2) Additional Terms and Conditions

- a. The requirements of this rule include compliance with the requirements of OAC rule 3745-17-07(B)(7)(b).
- b. The emission limitation(s) and/or control requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
- c. The permittee shall minimize or eliminate visible fugitive particulate emissions through installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, and vent and control the fugitive dust. In accordance with the permittee's permit application, the permittee has committed to venting the enclosed fly ash and bed ash conveying system to a baghouse. In accordance with the permittee's permit application, the permittee has committed to enclosing the coke conveyors.

c) Operational Restrictions

- (1) The combined tons of coke loaded-in to the premises by emissions units F006, F007 and F011 shall not exceed 730,000 tons per rolling, 12-month period.

[OAC rule 3745-77-07(A)(1) and PTI 04-01056]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:

- a. the tons of coke loaded-in to the premises by emissions units F006, F007, and F011, combined; and
- b. The rolling, 12-month summation of the tons of coke loaded-in to the premises by emissions units F006, F007, and F011, combined.

[OAC rule 3745-77-07(C)(1) and PTI 04-01056]

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. the total duration of any visible emissions incident; and
- c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1)]



- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. each month during which the operational restriction specified in c)(1) was exceeded.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(C)(1)(c)]

- (2) The permittee shall submit semiannual written reports that identify:
- a. all days during which any visible particulate emissions were observed from any stack serving this emissions unit; and



- b. any corrective actions taken to eliminate the visible particulate emissions from any stack serving this emissions unit.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit semiannual written reports that identify:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

PE shall not exceed 12.0 tons per year

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by the following calculation.

Coke transfer and conveying

If required, multiply the actual annual coke throughput (tons/yr) by the AP-42 emission factor for PE determined from Equation 1 of Section 13.2.4 dated 11/06 (0.01 lb/ton), multiply by 5 transfer points, multiply by one minus the decimal fraction control efficiency for insertable dust collector (1-0.999) and divide by 2,000 pounds per ton to determine the controlled stack emissions (0.02 ton/yr). These 5 emission points include: Conveyor Belt 1 through loadout diverter gate to conveyor 2; Conveyor 2 to Conveyor 3; Conveyor 3 to Conveyor 4; Stack out diverter and reclaim feeder to conveyor 4; and Conveyor 5 to CFB bunkers. If required, the permittee shall determine the actual hourly particulate emissions



rate from the coke conveying using Methods 1 through 5 of 40 CFR Part 60, Appendix A.

Multiply the actual annual coke throughput (tons/yr) by the AP-42 emission factor for PE determined from Equation 1 of Section 13.2.4 dated 11/06 (0.01 lb/ton), multiply by 2 transfer points, multiply by one minus the decimal fraction control efficiency for maintaining high moisture content (1-0.9) and divide by 2,000 pounds per ton to determine the controlled emissions from railcar transfer system hopper to conveyor and belt conveyor to receiving hopper.

Fly ash and bed ash transfer and conveying

Multiply the sum of the vendor supplied uncontrolled emission factors for PE from the silo ash silo vent filter and vacuum blower exhaust stack (330 lbs/hr + 280 lbs/hr), multiply by one minus the design decimal fraction control efficiency (1-0.999), multiply by the actual annual hours of operation, and divide by 2,000 pounds per ton to determine the controlled emissions from fly ash transfer and conveying. If required, the permittee shall determine the actual hourly particulate emissions rate from the silo ash vent filter and vacuum blower exhaust stack using Methods 1 through 5 of 40 CFR Part 60, Appendix A.

Multiply the vendor supplied uncontrolled emission factors for PE for bed ash conveying (140 lbs/hr), multiply by one minus the design decimal fraction control efficiency (1-0.999), multiply by the actual annual hours of operation, and divide by 2,000 pounds per ton to determine the controlled emissions from bed ash transfer and conveying. If required, the permittee shall determine the actual hourly particulate emissions rate from bed ash conveying using Methods 1 through 5 of 40 CFR Part 60, Appendix A.

Sum the annual PE from each of the above operations to determine the controlled emissions from transfer and conveying.

b. Emission Limitation:

PM10 emissions shall not exceed 6.79 tons per year

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by the following calculation.

Coke transfer and conveying

Multiply the actual annual coke throughput (tons/yr) by the AP-42 emission factor for PM10 determined from Equation 1 of Section 13.2.4 dated 11/06 (0.005 lb/ton), multiply by 5 transfer points, multiply by one minus the decimal fraction control efficiency for insertable dust collector (1-0.999) and divide by 2,000 pounds per ton to determine the controlled stack emissions. These 5 emission points include: Conveyor Belt 1 through loadout diverter gate to conveyor 2; Conveyor 2 to Conveyor 3; Conveyor 3 to Conveyor 4; Stack out diverter and



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

reclaim feeder to conveyor 4; and Conveyor 5 to CFB bunkers. If required, the permittee shall determine the actual hourly PM10 emissions rate from coke conveying using Method 201 of 40 CFR Part 51, Appendix M.

Multiply the actual annual coke throughput (tons/yr) by the AP-42 emission factor for PM10 determined from Equation 1 of Section 13.2.4 dated 11/06 (0.005 lb/ton), multiply by 2 transfer points, multiply by one minus the decimal fraction control efficiency for maintaining high moisture content (1-0.9) and divide by 2,000 pounds per ton to determine the controlled emissions from railcar transfer system hopper to conveyor and belt conveyor to receiving hopper.

Fly ash and bed ash transfer and conveying

Multiply the sum of the vendor supplied uncontrolled emission factors for PM10 from the silo ash silo vent filter and vacuum blower exhaust stack (300 lbs/hr + 250 lbs/hr), multiply by one minus the design decimal fraction control efficiency (1-0.999), multiply by the actual annual hours of operation, and divide by 2,000 pounds per ton to determine the controlled emissions from fly ash transfer and conveying. If required, the permittee shall determine the actual hourly PM10 emissions rate from the silo ash vent filter and vacuum blower exhaust stack using Method 201 of 40 CFR Part 60, Appendix A.

Multiply the vendor supplied uncontrolled emission factors for PM10 for bed ash conveying (130 lbs/hr), multiply by one minus the design decimal fraction control efficiency (1-0.999), multiply by the actual annual hours of operation, and divide by 2,000 pounds per ton to determine the controlled emissions from bed ash transfer and conveying. If required, the permittee shall determine the actual hourly particulate emissions rate from bed ash conveying using Method 201 of 40 CFR Part 51, Appendix M.

Sum the annual PE from each of the above operations to determine the controlled emission rate for transfer and conveying.

c. Emission Limitation:

visible PE of fugitive dust shall not exceed 20 percent opacity as a 3-minute average

Applicable Compliance Method:

If required, Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03 shall be used to demonstrate compliance.

d. Emission Limitation:

there shall be no visible emissions from any stack serving this emissions unit



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using Method 22 of 40 CFR Part 60, Appendix A.

e. Emission Limitation:

the combined PE from all stacks associated with coke conveying shall not exceed 3 pounds per hour

Applicable Compliance Method:

Multiply the actual hourly throughput (tons/hr) by the AP-42 emission factor for PM10 determined from Equation 1 of Section 13.2.4 dated 11/06 (0.005 lb/ton), multiply by 5 transfer points, multiply by one minus the decimal fraction control efficiency for insertable dust collector (1-0.999) to determine the controlled stack emissions. These 5 emission points that are vented to a stack include: Conveyor Belt 1 through loadout diverter gate to conveyor 2; Conveyor 2 to Conveyor 3; Conveyor 3 to Conveyor 4; Stack out diverter and reclaim feeder to conveyor 4; and Conveyor 5 to CFB bunkers.

If required, the permittee shall demonstrate compliance using Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

f. Emission Limitation:

the combined PE from all stacks associated with fly ash conveying shall not exceed 36 pounds per hour

Applicable Compliance Method:

Multiply the sum of the vendor supplied uncontrolled emission factors for PE from the silo ash silo vent filter and vacuum blower exhaust stack (300 lbs/hr + 250 lbs/hr), multiply by one minus the design decimal fraction control efficiency (1-0.999) to determine the controlled particulate emissions from fly ash transfer and conveying (0.55 lb/hr).

If required, the permittee shall demonstrate compliance using Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

g. Emission Limitation:

the combined PE from all stacks associated with bed ash conveying shall not exceed 14 pounds per hour

Applicable Compliance Method:

Multiply the vendor supplied uncontrolled emission factor for PE for bed ash conveying (140 lbs/hr), multiply by one minus the design decimal fraction control



efficiency (1-0.999) to determine the controlled emissions from fly ash transfer and conveying (0.14 lb/hr).

If required, the permittee shall demonstrate compliance using Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

[OAC rule 3745-77-07(C)]

g) Miscellaneous Requirements

(1) None.



10. F012, Bed Ash truck loadout Station

Operations, Property and/or Equipment Description:

CFB bed ash truck load-out station with telescoping spout vented to fabric filter

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01056 issued 12/26/2006)	particulate emissions (PE) shall not exceed 2.22 tons per year particulate matter less than or equal to 10 microns in diameter (PM10) emissions shall not exceed 0.78 tons per year there shall be no visible emissions from the stack serving this emissions unit see b)(2)a.
b.	OAC rule 3745-17-07(A)(1)	see b)(2)b.
c.	OAC rule 3745-17-07(B)(7)(b)	visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average
d.	OAC rule 3745-17-08(B)	see b)(2)b.
e.	OAC rule 3745-17-11(B)	PE from the stack serving this emissions unit shall not exceed 3.8 pounds per hour

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall perform the following control measure(s) to ensure compliance:

material handling operation(s):
bed ash truck load-out



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

control measure(s):

telescoping spout vented to fabric filter, partial enclosure

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- b. The emission limitation specified by this rule is less stringent than the limitation specified by OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and, when the weather conditions allow, for any visible particulate emissions from the exhaust stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from any points of capture and/or the stack, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. the total duration of any visible emissions incident; and
- c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
 - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
 - c. any corrective actions taken eliminate the visible emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)]



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible fugitive dust emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be determined in accordance with Method 9 of 40 CFR Part 60, Appendix A and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

b. Emission Limitation:

PE shall not exceed 2.22 tons per year

Applicable Compliance Method:

Compliance may be determined by the following calculation. Multiply the actual annual bed ash loaded-out (tons/yr) by the AP-42 PE factor from Equation 1 of Section 13.2.4 dated 11/06 (0.2507 lb/ton), divide by 2000 lbs/ton and multiplying the results by one minus the decimal fraction control efficiency for telescoping chute vented to fabric filter (1-0.9).

c. PM10 emissions shall not exceed 0.78 ton per year

Applicable Compliance Method:

Compliance may be determined by the following calculation. Multiply the actual annual bed ash loaded-out (tons/yr) by the AP-42 PE factor from Equation 1 of Section 13.2.4 dated 11/06 (0.0878 lb/ton), divide by 2000 lbs/ton and multiplying the results by one minus the decimal fraction control efficiency for telescoping chute vented to fabric filter (1-0.9).

d. Emission Limitation:

there shall be no visible emissions from the stack

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with Method 22 of 40 CFR Part 60, Appendix A.



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

e. Emission Limitation:

PE from the stack serving this emissions unit shall not exceed 3.8 pounds per hour

Applicable Compliance Method:

Compliance may be demonstrated by the following calculation. Multiply the actual loading rate (tons/hr) by the particulate emission factor for bed ash calculated using Equation 1 of AP-42 Section 13.2.4 dated 11/06 (0.205 lb PE/ton) by the estimated capture efficiency (91%) and multiply by the 1 minus the decimal fraction design control efficiency (1-0.99) to determine the actual stack emission rate.

If required, the permittee shall demonstrate compliance using Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

[OAC rule 3745-77-07(C)]

g) Miscellaneous Requirements

(1) None.



11. F014, Coke Truck Load-out at Transfer House #1

Operations, Property and/or Equipment Description:

Coke truck load-out station at transfer house 1

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01056 issued 12/26/2006)	particulate emissions (PE) shall not exceed 5.48 tons per year particulate matter less than or equal to 10 microns in diameter (PM10) emissions shall not exceed 2.74 tons per year see b)(2)a. and b.
b.	OAC rule 3745-17-07(B)(7)(b)	visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average
c.	OAC rule 3745-17-08	see b)(2)c.

(2) Additional Terms and Conditions

a. The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

coke truck load-out at transfer house #1

The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to ensure that the coke contains sufficient moisture to ensure compliance with the visible emissions limitation.



Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- b. The coke truck loadout shall be treated with water and/or suitable dust suppression chemicals, if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- c. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section and for coke load-out stations that are not adequately enclosed, the permittee shall perform inspections of such coke load-out stations with the following frequencies:

coke load-out station identification: minimum inspection frequency:

coke truck load-out station at transfer house #1 daily when in operation

[OAC rule 3745-77-07(C)(1)]

- (2) The above-mentioned inspections shall be performed during representative, normal operating conditions.

[OAC rule 3745-77-07(C)(1)]

- (3) After the permittee has performed weekly inspections of the coke truck load-out station at transfer house #1 for 30 days, and no visible emissions of fugitive dust have been observed, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily until such time as there are no visible particulate emissions for another 30 days.

- (4) The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;



- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented.

The information in (4)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[OAC rule 3745-77-07(C)(1)]

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 04-01056 issued on 12/26/2006:d)(1) and d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency; and
 - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Visible fugitive dust emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be determined in accordance with Method 9 of 40 CFR Part 60, Appendix A and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.



b. Emission Limitation:

PE shall not exceed 5.48 tons per year

Applicable Compliance Method:

If required, multiply the actual annual petroleum coke handled (tons/yr) by the AP-42 PE factor from Equation 1 of Section 13.2.4 dated 11/06 (0.01 lb/ton), divide by 2000 lbs/ton and multiplying the results by one minus the decimal fraction control efficiency for watering (1-0.5).

c. PM10 emissions shall not exceed 2.74 tons per year

Applicable Compliance Method:

If required, multiply the actual annual petroleum coke handled (tons/yr) by the AP-42 PM10 factor from Equation 1 of Section 13.2.4 dated 11/06 (0.005 lb/ton), divide by 2000 lbs/ton and multiplying the results by one minus the decimal fraction control efficiency for watering (1-0.5).

[OAC rule 3745-77-07(C) and PTI 04-01056]

g) Miscellaneous Requirements

(1) None.



12. P001, Limestone Dryer

Operations, Property and/or Equipment Description:

Limestone dryer serving the limestone preparation building controlled by the baghouse (12.0 mmBtu/hr direct-fired natural gas or No. 2 fuel oil)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0111034 as Administratively Modified on 10/3/2012)	carbon monoxide (CO) emissions shall not exceed 1.01 pounds per hour and 4.4 tons per year nitrogen oxides (NOx) emissions shall not exceed 1.74 pounds per hour and 7.63 tons per year particulate emissions (PE) shall not exceed 0.002 pound per hour and 0.008 ton per year particulate matter less than or equal to 10 microns in diameter (PM10) emissions shall not exceed 0.001 pound per hour and 0.004 ton per year sulfur dioxide (SO ₂) emissions shall not exceed 4.83 pounds per hour and 21.15 tons per year volatile organic compounds (VOC) emissions shall not exceed 0.07 pound per hour and 0.31 ton per year see b)(2)a.
b.	OAC rule 3745-17-07(A)(1)	visible particulate emissions from the stack serving this emissions unit shall not



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 20 percent opacity as a 6-minute average
c.	OAC rule 3745-17-11(B)	see b)(2)b.
d.	OAC rule 3745-18-06(C)	exemption - see b)(2)c.
e.	40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480 - 63.7575)	the dryer is direct-fired and is not subject to the requirements of this rule

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-17-11(B).
- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. This emissions unit is exempt from OAC rule 3745-18-06(E), since the maximum weight of fuel that can be combusted is less than 1,000 pounds per hour.

c) Operational Restrictions

- (1) The permittee shall only burn natural gas or burn number 2 fuel oil with a sulfur content of no greater than 0.39 percent sulfur by weight in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI P0111034]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI P0111034]

- (2) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittee's or oil suppliers' analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as ASTM methods D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

[OAC rule 3745-77-07(C)(1) and PTI P0111034]



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. an identification of each day during which the sulfur content of fuel received contained greater than 0.39 percent sulfur by weight on an as-received basis.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI P0111034]

- (2) The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day when a fuel other than natural gas or number two fuel oil was burned in this emissions unit.

Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI P0111034]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

20% opacity from stacks or vents

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated using Method 9 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:

CO emissions shall not exceed 1.01 pounds per hour and 4.4 tons per year

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by the following calculation. Divide the actual firing rate (mmBtu/hr) by the natural gas heating value (1,020 mmBtu/mmscf), and multiply by the AP-42 emission factor for CO from Table 1.4-1 dated 7/98 (84 lb/mmscf) to determine the hourly emissions.



If required, the permittee shall demonstrate compliance with the hourly emission limitation using Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

The ton per year emission limitation was developed by multiplying the short-term allowable CO emission limitation (1.01 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission Limitation:

NOx emissions shall not exceed 1.74 pounds per hour and 7.63 tons per year

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by the following calculation. Multiply the actual oil firing rate (gal/hr) by the AP-42 emission factor for NOx from Table 1.3-1 dated 5/10 (20 lb/1000 gal).

If required, the permittee shall demonstrate compliance with the hourly emission limitation using Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A.

The ton per year emission limitation was developed by multiplying the short-term allowable NOx emission limitation (1.74 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

d. Emission Limitation:

PE shall not exceed 0.002 pound per hour and 0.008 ton per year.

Applicable Compliance Method:

Compliance may be determined by the following calculation. Multiply the actual oil firing rate (gal/hr) by the AP-42 emission factor for PE from Table 1.3-1 dated 5/10 (2 lb/1000 gal), and multiply by one minus the decimal fraction control efficiency (1-0.99) to determine the hourly emissions.

If required, the permittee shall demonstrate compliance with the hourly emission limitation using Methods 1 through 4 and 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

The ton per year emission limitation was developed by multiplying the short-term allowable PE limitation (0.002 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.



e. Emission Limitation:

PM10 emissions shall not exceed 0.001 pound per hour and 0.004 ton per year

Applicable Compliance Method:

Compliance may be determined by the following calculation. Multiply the actual oil firing rate (gal/hr) by the AP-42 emission factor for PE from Tables 1.3-1 (2 lb/1000 gal), multiply by the PM10 decimal fraction from AP-42 Table 1.3-6 dated 5/10 (0.5), and multiply by one minus the decimal fraction control efficiency (1-0.99) to determine the hourly emissions.

If required, the permittee shall demonstrate compliance with the hourly emission limitation using Method 201 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

The ton per year emission limitation was developed by multiplying the short-term allowable PM10 emission limitation (0.001 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

f. Emission Limitation:

SO₂ emissions shall not exceed 4.83 pounds per hour and 21.15 tons per year

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by the following calculation. Multiply the actual oil firing rate (gal/hr) by the AP-42 emission factor for SO₂ from Table 1.3-1 dated 5/10 (142S lb/1000 gal, where S = 0.39) to determine the hourly emissions.

If required, the permittee shall demonstrate compliance with the hourly emission limitation using Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

The ton per year emission limitation was developed by multiplying the short-term allowable SO₂ emission limitation (4.83 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

VOC emissions shall not exceed 0.07 pound per hour and 0.31 ton per year



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by the following calculation. Multiply the actual oil firing rate (gal/hr) by the AP-42 emission factor for nonmethane TOC from Table 1.3-3 dated 5/10 (0.34 lb/1000 gal).

If required, the permittee shall demonstrate compliance with the hourly emission limitation using Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A.

The ton per year emission limitation was developed by multiplying the short-term allowable VOC emission limitation (0.07 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[OAC rule 3745-77-07(C)(1) and PTI P0111034]

g) Miscellaneous Requirements

(1) None.



13. Emissions Unit Group -X001: B002, B003, B004,

EU ID	Operations, Property and/or Equipment Description
B002	Babcock & Wilcox pulverized coal-fired, dry bottom boiler, having a nominal heat input capacity of 1240 mmBtu/hr, and controlled with an electrostatic precipitator (ESP)
B003	Babcock & Wilcox pulverized coal-fired, dry bottom boiler, having a nominal heat input capacity of 1217 mmBtu/hr with low-NOx burners, and controlled with an electrostatic precipitator (ESP)
B004	Babcock & Wilcox pulverized coal-fired, dry bottom boiler, having a nominal heat input capacity of 1862 mmBtu/hr with low-NOx burners, and controlled with an electrostatic precipitator (ESP)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) b)(1)d.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule
b.	OAC rule 3745-17-10(C)(1)	see b)(2)a.
c.	OAC rule 3745-18-54(V)(1)	sulfur dioxide (SO ₂) emissions shall not exceed 1.94 pounds per million Btu actual heat input
d.	OAC rule 3745-110-02	see b)(2)j.
e.	40 CFR Part 63, Subpart UUUUU (40 CFR 63.9980 – 63.10042) [In accordance with 40 CFR 63.9991, this emissions unit is an existing coal-fired (designed for coal with a heating value greater than or equal to 8,300 Btu/lb) electric utility steam generating unit (EGU) subject to the emissions limitations/control measures specified in this section]	see b)(2)f. through i.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR Part 63, Subpart A (40 CFR 63.1 – 16)	Table 9 to Subpart UUUUU of 40 CFR Part 63 – Applicability of General Provisions to Subpart UUUUU shows which parts of the General Provisions in 40 CFR 63.1-16 apply.
g.	40 CFR Part 64 [In accordance with 40 CFR 64.2(a), this emissions unit is a pollutant specific emissions unit located at a major source required to obtain a Title V permit, is subject to a particulate emission standard, uses a control device to achieve compliance with the emission standard, and has potential pre-control device particulate emissions greater than 100 tons per year.]	Pursuant to 40 CFR 64.2(b), CAM will not apply to the MACT emission limitations or standards in 40 CFR Part 63, Subpart UUUUU, after the compliance date in that rule.

(2) Additional Terms and Conditions

- a. The particulate emissions for the fuel burning equipment fired with coal shall not exceed the allowable emission rate specified by “Curve P-1” of “Figure I0”, from the Appendix of OAC rule 3745-17-10, or shall not exceed 0.1 pound per million Btu actual heat input.
- b. The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system, designed to ensure continuous valid and representative readings of opacity and compliance with 40 CFR Part 60, Appendix B, Performance Specification 1. The plan shall include, at a minimum, procedures for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring accurate operation of the continuous opacity monitoring system on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours. The permittee may keep these records electronically (on or offsite), provided the record can be made readily available when requested by Ohio EPA.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13 and 40 CFR Part 60, Appendix B]
- c. The continuous opacity monitoring system consists of all the equipment used to acquire data and record opacity.



[OAC rule 3745-77-07(C)(1), 40 CFR 60.2 and/or 40 CFR 63.2, and Appendix B to 40 CFR Part 60]

- d. The permittee shall maintain a written quality assurance/quality control plan for the continuous SO₂ monitoring system, designed to ensure continuous valid and representative readings of SO₂ emissions in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous SO₂ monitoring system must be kept on site and available for inspection during regular office hours. The permittee may keep these records electronically (on or offsite), provided the record can be made readily available when requested by Ohio EPA.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous SO₂ monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits pursuant to 40 CFR Part 60, and linearity checks pursuant to 40 CFR Part 75; however, linearity checks completed pursuant to 40 CFR Part 75, Appendix B, may be substituted for the quarterly cylinder gas or relative accuracy audits required per 40 CFR Part 60.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13, 40 CFR Part 60, Appendix F, and 40 CFR Part 75]

- e. The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

[40 CFR 60.2] and/or [40 CFR 63.2] and [Appendix F to 40 CFR Part 60]

- f. The permittee shall comply with the requirements of this subpart no later than April 16, 2015, or on the date the emissions unit meets the definition of an EGU subject to this subpart. Additional compliance deadlines are specified in 40 CFR 63.9984.

- g. Except as provided under the Emissions Averaging provisions specified in 63.10009, the permittee shall comply with the following:

- i. 3.0E-2 lb/MMBtu or 3.0E-1 lb/MWh filterable particulate matter (PM);
- ii. 5.0E-5 lb/MMBtu or 5.0E-1 lb/GWh total non-mercury HAP metals; or
- iii. the following individual HAP metals;



- (a) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh antimony (Sb);
- (b) 1.1 lb/TBtu or 2.0E-2 lb/GWh arsenic (As);
- (c) 2.0E-1 lb/TBtu or 2.0E-3 lb/GWh beryllium (Be);
- (d) 3.0E-1 lb/TBtu or 3.0E-3 lb/GWh cadmium (Cd);
- (e) 2.8 lb/TBtu or 3.0E-2 lb/GWh chromium (Cr);
- (f) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh cobalt (Co);
- (g) 1.2 lb/TBtu or 2.0 E-2lb/GWh lead (Pb);
- (h) 4.0 lb/TBtu or 5.0E-2 lb/GWh manganese (Mn);
- (i) 3.5 lb/TBtu or 4.0E-2 lb/GWh nickel (Ni); and
- (j) 5.0 lb/TBtu or 6.0E-2 lb/GWh selenium (Se).

- h. Except as provided under the Emissions Averaging provisions specified in 63.10009, the permittee shall comply with the following:
 - i. 2.0E-3 lb/MMBtu or 2.0E-2 lb/MWh hydrogen chloride (HCl); or
 - ii. 2.0E-1 lb/MMBtu or 1.5 lb/MWh sulfur dioxide (SO₂).
- i. Except as provided under the emissions averaging provisions specified in 63.10009, the permittee shall comply with the following:
 - i. 1.2 lb/TBtu or 1.3E-2 lb/GWh mercury (Hg).
- j. This existing source is not subject to this rule since Lucas County is not one of the counties listed under OAC rule 3745-110-02(A)(1)(b).

c) Operational Restrictions

- (1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart UUUUU, including the following sections:

63.9991(a)(1)	meet at all times each emission limit and work practice standard in Tables 1 through 3, except as provided in 63.10009
63.9991(a)(2)	meet at all times each operating limit in Table 4
63.9991(b)	administrator may approve alternative to work practice standards
63.10000(a)	must be in compliance with applicable emission limits and operating limits at all times except during



	periods of startup and shutdown, and required to meet Table 3 work practice requirements during periods of startup and shutdown
63.10000(b)	must operate and maintain affected source, including associated air pollution control equipment and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions
63.10000(h)	requirements for an emissions unit that does not meet the definition of an EGU subject to this subpart on 4/16/2015 and later commences operation that causes the emissions unit to meet the definition of EGU in this subpart
63.10000(f), (g), (i), (j)	requirements following last date the unit met the definition of an EGU

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA’s Central Office verifying that the continuous opacity monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter/document of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13 and 40 CFR Part 60, Appendix B]

- (2) The permittee shall operate and maintain the continuous opacity monitoring system to continuously monitor and record the opacity in the stack serving this emissions unit. The continuous monitoring and recording equipment shall comply with the operational and maintenance requirements specified in 40 CFR Part 60.

The permittee shall maintain records of data obtained by the continuous opacity monitoring system including, but not limited to:

- a. percent opacity on an instantaneous (one-minute) and 6-minute block average basis;
- b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

- c. hours of operation of the emissions unit, continuous opacity monitoring system, and control equipment;
- d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous opacity monitoring system;
- e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous opacity monitoring system; as well as,
- f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).

[40 CFR 60.13] and [40 CFR Part 60, Appendix B]

- (3) To obtain an exemption pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain a temperature monitor that measures the temperature of the boiler exhaust gases entering the ESP (a) during all periods of startup until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b) during all periods of shutdown until the inlet temperature of the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i). An electronic or hardcopy record of the temperatures during periods of start-up and shutdown shall be maintained.

The temperature monitor shall be installed, calibrated, operated, and maintained in accordance with manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in units of degrees Fahrenheit.

[OAC rules 3745-77-07(C)(1), 3745-17-07(A)(3)(a)(i) and 3745-17-07(A)(3)(b)(i)].

- (4) The permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous SO₂ monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

[40 CFR 60.13]; [40 CFR Part 60, Appendix B]; and [40 CFR Part 75]

- (5) The permittee shall operate and maintain equipment to continuously monitor and record SO₂ emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60 and 40 CFR Part 75.

The permittee shall maintain records of all data obtained by the continuous SO₂ monitoring system including, but not limited to:



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

- a. emissions of SO₂ in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. emissions of SO₂ in pounds per hour and in units of the applicable standard(s) in the appropriate averaging period;
- c. results of quarterly cylinder gas audits or linearity checks;
- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of the emissions unit, continuous SO₂ monitoring system, and control equipment;
- g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous SO₂ monitoring system;
- h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous SO₂ monitoring system; as well as,
- i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).
- j. All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

[OAC rule 3745-18-04(D)(2) and OAC rule 3745-77-07(C)(1)]

- (6) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for visible particulate emissions is the opacity of the visible emissions from the common stack as measured and recorded by the certified continuous opacity monitoring (COM) system. The visible particulate emissions indicator range is each three-hour block average with an opacity value greater than 20%. The three-hour block average opacity shall be based on the one-minute values recorded in d)(2)a. When the opacity value over the averaging period of the indicator range is greater than 20%, corrective action (including, but not limited to, an evaluation of the emissions unit and electrostatic precipitator) shall be assessed and implemented as appropriate.

Upon detecting an excursion of the visible particulate emission indicator range listed above, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the



likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (7) After the compliance date specified in 40 CFR Part 63, Subpart UUUUU, the PM monitoring requirements specified in 40 CFR section 63.10010 may satisfy the monitoring requirements of 40 CFR Part 64 specified in d)(6)), if the permittee chooses to comply with the PM emission limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU. Since the CAM requirements of 40 CFR Part 64 will continue to apply after the date specified in 40 CFR Part 63, Subpart UUUUU, the CAM plan shall be revised at such time to be consistent with the MACT monitoring requirements, if the permittee chooses to comply with PM emission limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (8) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart UUUUU, including the following sections:

63.10000(d)	site specific monitoring plan requirements
63.10000(k)	monitoring systems necessary for newly applicable requirements resulting from cessation or recommencement of operations
63.10001, (a)	affirmative defense
63.10005(j)	startup and shutdown requirements
63.10007(f)	availability of performance test records
63.10010(a)	continuous monitoring system requirements for CEMS, PM CPMS, and sorbent trap monitoring systems
63.10010(b)	installation requirements for O ₂ and CO ₂ monitoring systems



63.10010(c)	flow monitoring requirements
63.10010(d)	moisture monitoring requirements
63.10010(e)	HCl and/or HF CEMS requirements
63.10010(f)	SO ₂ CEMS requirements
63.10010(g)	Hg CEMS or sorbent trap monitoring system requirements
63.10010(h)	PM CPMS requirements
63.10010(i)	PM CEMS requirements
63.10010(j)	HAP metals CEMS requirements
63.10020(a)	monitor and collect data according to site-specific monitoring plan required by 63.10000(d)
63.10020(b)	monitoring system operation and quality assurance or quality control activities
63.10020(c)	use of data collected
63.10020(d)	deviations from monitoring requirements
63.10021(h)	keep records specified in 63.10032 during periods of startup and shutdown
63.10032(a)	recordkeeping requirements
63.10032(b)	CEMS and CPMS recordkeeping requirements
63.10032(c)	keep records required in Table 7 including records of all monitoring data and calculated averages for applicable PM CPMS operating limits
63.10032(d)	monthly fuel usage records, combusting secondary materials, LEE records
63.10032(e)	emissions averaging records
63.10032(f)	startup and shutdown records
63.10032(g)	malfunction records
63.10032(h)	records of actions taken to minimize malfunction period emissions



63.10032(i)	records of type(s) and amount(s) of fuel used during each startup and shutdown
63.10033(a)	records must be in a form readily available for expeditious review
63.10033(b)	records retention
63.10033(c)	location of records

e) Reporting Requirements

- (1) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous opacity monitoring system:
 - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of opacity values in excess of any limitation specified in this permit, and OAC rule 3745-17-07. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance.
 - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous opacity monitor;
 - iii. a description of any change in the equipment that comprises the continuous opacity monitoring system (COMS), including any change to the hardware, changes to the software that may affect COMS readings, and/or changes in the location of the COMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. the total operating time (hours) of the emissions unit;
 - vi. the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;
 - vii. the date, time, and duration of any/each malfunction** of the continuous opacity monitoring system, emissions unit, and/or control equipment;



- viii. the date, time, and duration of any downtime** of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and
- ix. the reason (if known) and the corrective actions taken (if any) for each event in (b)(vii) and (viii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* where no exceedance of the opacity limit has occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the quarterly EER report

** each downtime and malfunction event shall be reported regardless of whether there is an exceedance of the opacity limit

[OAC rule 3745-77-07(C)(1), and 40 CFR 60.7]

- (2) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous SO₂ monitoring system:
 - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of SO₂ emissions in excess of any applicable limit specified in this permit, and OAC Chapter 3745-18. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
 - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous SO₂ and other associated monitors;
 - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

- v. the total SO₂ emissions for the calendar quarter (tons);
- vi. the total operating time (hours) of the emissions unit;
- vii. the total operating time of the continuous SO₂ monitoring system while the emissions unit was in operation;
- viii. results and dates of quarterly cylinder gas audits or linearity checks;
- ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- x. unless previously submitted, the results of any relative accuracy test audit showing the continuous SO₂ monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction** of the continuous SO₂ monitoring system, emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime** of the continuous SO₂ monitoring system and/or control equipment while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

** each downtime and malfunction event shall be reported regardless of whether there is an exceedance of any applicable limit

[OAC rule 3745-77-07(C)(1)], [40 CFR 60.7] and [40 CFR Part 75]

- (3) The permittee shall collect, record, and maintain measurements, data, records, and reports required per 40 CFR Part 75; and shall submit certification, recertification, notifications, applications, monitoring plans, petitions for alternative monitoring systems, electronic quarterly reports, and any other pertinent record and/or report to the Administrator (U.S. EPA), as required by this Part.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 75]

- (4) If the results of CAM monitoring or record keeping data indicate that the particulate emission limitations may have been exceeded when burning coal, the permittee shall submit the results of that data, and document any corrective action taken to restore operation of the emissions unit, or its control equipment to its normal or usual manner of



operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

- (5) After the compliance date specified in 40 CFR Part 63, Subpart UUUUU, the reporting requirements specified in 40 CFR section 63.10031 may satisfy the reporting requirements of 40 CFR Part 64 specified in e)(1), if the permittee chooses to comply with the PM emission limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU. Since the CAM requirements of 40 CFR Part 64 will continue to apply after the date specified in 40 CFR Part 63, Subpart UUUUU, the CAM plan shall be revised at such time to be consistent with the MACT reporting requirements, if the permittee chooses to comply with PM emission limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (6) The permittee shall submit reports and other such notifications as are required pursuant to 40 CFR Part 63, Subpart UUUUU, per the following sections:

63.9984(c)	<p>meet notification requirements in 63.10030 according to schedule in 63.10030 and in 40 CFR Part 63, Subpart A</p> <p>some notifications are due prior to the April 16, 2015 compliance date</p>
63.10000(i)(2)	notification requirements for when EGU will cease complying with this subpart
63.10001(b)	affirmative defense notification requirements
63.10005(k)	submit Notification of Compliance Status per 63.10030
63.10006(j)	report results of performance tests and performance tune-ups within 60 days after completion
63.11011(e)	submit Notification of Compliance Status containing the results of the initial compliance demonstration
63.10021(f)	reporting requirements
63.10021(g)	reporting deviations from an applicable operating limit or operating limit in Tables 1 through 4
63.10021(i)	submit reports specified in 63.10031 concerning



	activities and periods of startup and shutdown
63.10030(a)	submit all notifications in 63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply by the dates specified
63.10030(b)	Initial Notification submission deadline
63.10030(d)	Notification of Intent to conduct a performance test submittal requirement
63.10030(e)	Notification of Compliance Status submittal requirements
63.10031(a)	submit each report in Table 8 that applies, and, if you are required or elect to continuously monitor Hg and/or HCl, and/or HF emissions, submit the electronic reports required under Appendix A and/or B at the specified frequency
63.10031(b)	reporting schedule
63.10031(c)	compliance report content
63.10031(d)	compliance report content when using a CMS
63.10031(e)	semiannual monitoring report
63.10031(f)	requirements for submitting performance test results to EPA's WebFIRE database
63.10031(g)	malfunction compliance report requirements

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule

Applicable Compliance Method:

Compliance with this emission limitation shall be determined according to the following:



Preliminary Proposed Title V Permit

FirstEnergy Generation LLC, Bay Shore Plant

Permit Number: P0105130

Facility ID: 0448020006

Effective Date: To be entered upon final issuance

- i. Method 9 of 40 CFR Part 60, Appendix A; or as an alternative
- ii. use of the continuous opacity monitoring system data. The continuous opacity monitoring system shall comply with the requirements specified in 40 CFR 60.13 and shall be certified in accordance with the requirements of "USEPA Performance Specification 1." During each calendar quarter, the permittee shall be deemed in compliance with paragraph (A)(1) of rule 3745-17-07 of the Administrative Code if the following conditions are met:
 - (a) the nonexempt opacity values in excess of 20% opacity are less than 1.10 percent of the 6-minute average opacity values. (Exempt opacity values are defined in paragraphs (A)(1)(b), (A)(2), and (A)(3) of OAC rule 3745-17-07.)
 - (b) none of the nonexempt 6-minute average opacity values exceeds 60%.
 - (c) the total amount of time, in hours, of exempt and nonexempt opacity values greater than 20% and less than 60% (not including start-up, shutdown, and malfunction exemptions provided in paragraphs (A)(2), and (A)(3) of OAC rule 3745-17-07) does not exceed the product of 0.10 times the actual number of hours the emissions unit was in operation during the calendar quarter.

In the event of a discrepancy between the continuous opacity monitoring data and any observations performed in accordance with paragraph (B)(1)(a) of OAC rule 3745-17-03 during the same time period, an evaluation may be performed by the Ohio EPA to assess the accuracy of the continuous opacity monitoring data (which may include an audit of the continuous opacity monitoring system performed in accordance with U.S. EPA document 340/1-86-010) and "Acid Rain Program Continuous Emission Monitoring Systems (CEMS) Field Audit Manual" and the validity of the observations performed in accordance with paragraph (B)(1)(a) of OAC rule 3745-17-03. The Ohio EPA may accept and utilize any data or observation it finds credible. The permittee is not precluded from using any credible evidence in defense of any enforcement action that may be initiated by the Ohio EPA.

[OAC rule 3745-17-03(B)(1); and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

The particulate emissions for the fuel burning equipment fired with coal shall not exceed the allowable emission rate specified by "Curve P-1" of "Figure 1", from the Appendix of OAC rule 3745-17-10, or shall not exceed 0.1 pound per million Btu actual heat input.



Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using the methods and procedures specified in OAC rule 3745-17-03(B)(9) for determining amount of particulate emissions, heat content, and ash content.

c. Emission Limitation:

SO₂ emissions shall not exceed 1.94 pounds per million Btu actual heat input.

Applicable Compliance Method:

Ongoing compliance with the SO₂ emission limitations contained in this permit shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75.

If required, the permittee shall demonstrate compliance using the methods and procedures specified in OAC rule 3745-18-04(D)(1).

d. Emission Limitation:

- i. 3.0E-2 lb/MMBtu or 3.0E-1 lb/MWh filterable particulate matter (PM); or
5.0E-5 lb/MMBtu or 5.0E-1 lb/GWh total non-Hg HAP metals; or
the following individual HAP metals:
 - 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh antimony (Sb),
 - 1.1 lb/TBtu or 2.0E-2 lb/GWh arsenic (As),
 - 2.0E-1 lb/TBtu or 2.0E-3 lb/GWh beryllium (Be),
 - 3.0E-1 lb/TBtu or 3.0E-3 lb/GWh cadmium (Cd),
 - 2.8 lb/TBtu or 3.0E-2 lb/GWh chromium (Cr),
 - 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh cobalt (Co),
 - 1.2 lb/TBtu or 2.0E-2 lb/GWh lead (Pb),
 - 4.0 lb/TBtu or 5.0E-2 lb/GWh manganese (Mn),
 - 3.5 lb/TBtu or 4.0E-2 lb/GWh nickel (Ni), and
 - 5.0 lb/TBtu or 6.0E-2 lb/GWh selenium (Se).
- ii. 2.0E-3 lb/MMBtu or 2.0E-2 lb/MWh hydrogen chloride (HCl); or
2.0E-1 lb/MMbtu or 1.5 lb/MWh sulfur dioxide (SO₂).



iii. 1.2 lb/TBtu or 1.3E-2 lb/GWh mercury (Hg).

Applicable Compliance Method:

The permittee shall demonstrate compliance according to 40 CFR 63.10011, 63.10021, 63.10022, and 63.10023. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

[OAC rule 3745-77-07(C)]

(2) The permittee shall conduct, or have conducted, emission testing for emissions units B002, B003 and B004 in accordance with the following requirements:

a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to the permit expiration. If an emissions unit is idled during this time period, then testing shall be conducted within 6 months of startup.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for opacity, particulate emissions, in pound per million Btu actual heat input, and sulfur dioxide emissions in pound per million Btu actual heat input.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

The procedures in OAC rule 3745-17-03(B)(9) shall be used to determine amount of particulate emissions, heat content, and ash content.

The applicable compliance method specified f)(1)a. shall be used to determine the opacity.

OAC rule 3745-18-04(D)(1) shall be used to determine sulfur dioxide emissions.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The following additional information shall be included in the test report:

i. all 6-minute block average opacity values recorded by the continuous opacity monitoring system on the day the emission test was conducted;

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating



parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall comply with the applicable compliance requirements required under 40 CFR Part 63, Subpart UUUUU, including the following sections:

63.10000(c)(1)	initial performance testing requirements – testing is required for all pollutants to demonstrate compliance with applicable emission limits
63.10000(e)	perform periodic tune-ups according to 63.10021(e)
63.10005(a)	initial compliance demonstration requirements
63.10005(b)	initial performance testing requirements
63.10005(c)	establishing operating limits during initial compliance demonstration
63.10005(d)	CMS initial compliance demonstration requirements
63.10005(e), (f)	conduct performance tune-up according to 63.10021(e)
63.10005(h)	low emitting EGUs (LEE)
63.10006(a)	when using PM CPMS to monitor continuous performance, conduct testing according to Table 5 and 63.10007 at least every year
63.10006(b)	LEE repeat test frequency



63.10006(d)	HCl repeat testing requirements when the permittee does not use HCl CEMS to monitor compliance if an SO ₂ CEMS to monitor compliance with an alternate equivalent SO ₂ emission limit
63.10006(f)	repeat testing frequency requirements
63.10006(g)	repeat testing requirements when using emissions averaging compliance option
63.10006(h)	repeat testing requirements for when non-mercury LEE shows emissions greater than 50% of limit
63.10006(i)	if required to meet tune-up work practice standard, conduct performance tune-up according to 63.10021(e)
63.10007(a)	requirements for performance tests; conduct tests according to 63.7(d), (e), (f), and (h); and develop site-specific test plan according to 63.7(c)
63.10007(b)	conduct each performance test (including traditional 3-run test and 30-boiler operating day tests based on CEMS) according to Table 5
63.10007(c)	establishing operating limits when using PM CPMS
63.10007(d)	conducting performance tests
63.10007(e)	using performance testing to determine compliance with applicable Table 1 or 2 emission limits
63.10009(a)	emissions averaging compliance option
63.10009(b)	equations for EGU emissions averaging group
63.10009(c)	emissions averaging EGU groups venting to separate stacks
63.10009(d)	emissions averaging provisions for each EGU in the averaging group
63.10009(e)	emissions averaging compliance schedule
63.10009(f)	emissions averaging group eligibility demonstration
63.10009(g)	determining the weighted rolling average emissions rate



63.10009(h)	using a CEMS or sorbent trap to demonstrate compliance with emissions averaging
63.10009(i)	demonstrating compliance with emissions averaging through manual emission testing
63.10009(j)	emissions averaging plan
63.10009(k), (l), (m), (n)	emissions averaging with a common stack
63.10011(a)	demonstrate initial compliance with each emission limitation that applies by performance testing
63.10011(b)	establish an operating limit in accordance with Table 4 when using a PM CPMS
63.10011(c)(1)	initial performance test when using a CEMS or sorbent trap to measure HAP
63.10011(d)	deviations from the monitoring requirements
63.10011(f)	determine cleanest fuel for burning during startup and shutdown periods
63.10011(g)	follow startup and shutdown requirements in Table 3
63.10021(a)	demonstrate continuous compliance with each emissions limit, operating limit, and work practice standard in Tables 1 through 4 according to Tables 6 and 7 and 63.10021(b) through (g)
63.10021(b)	demonstration of compliance when using a CEMS to measure SO ₂ , PM, HCl, HF, or Hg emissions
63.10021(c)	demonstrating compliance when using a PM CPMS to measure compliance with an operating limit in Table 4
63.10021(d)	using quarterly stack testing to demonstrate compliance with one or more limits in Table 1 or 2
63.10021(e)	periodic performance tune-up requirements
63.10022(a)	continuous compliance provisions
63.10022(b)	continuous monitoring requirement deviations
63.10023(a)	recording PM CPMS output values during



	performance testing
63.10023(b)	determining PM CPMS operating limit
63.10023(c)	operate and maintain process and control equipment such that the 30 operating day average PM CPMS output does not exceed the operating limit

g) Miscellaneous Requirements

- (1) None.