

September 16, 2015

Ms. Jennifer VanVlerah  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
Lazarus Government Center  
50 West Town Street, Suite 700  
Columbus, Ohio 43215  
[jennifer.vanvlerah@epa.ohio.gov](mailto:jennifer.vanvlerah@epa.ohio.gov)

Dear Ms. VanVlerah:

Re: Proposed Rules: Sulfur Dioxide Regulations, One-Hour Sulfur Dioxide Standard and Ohio Administrative Code 3745-18, Ohio Administrative Code 3745-18-49 Lake County Emission Limits  
*Our File No. 043590*

On August 10, 2015, Ohio EPA issued a public notice requesting comments on proposed amended rules in Ohio Administrative Code 3745-18 and, specifically, Ohio Administrative Code 3745-18-49, Lake County Emission Limits. The following comments are submitted on behalf of FirstEnergy Solutions (“FirstEnergy”), which is an individual electric utility in the State of Ohio.

FirstEnergy thanks Ohio EPA for providing them with an opportunity to comment on these revisions. Based on a review of the proposed rules and the proposed State Implementation Plan, FirstEnergy provides the following comments. FirstEnergy hopes that Ohio EPA will revise the rules to reflect these comments so that the rules are technically sound and consistent with the law.

#### Ohio Administrative Code 3745-18-49 Lake County Emission Limits

Ohio EPA has proposed to strike in its entirety Paragraph (G) from Ohio Administrative Code 3745-18-49. This is incorrect. Page 24 of the April 3, 2015 State of Ohio Nonattainment Area State Implementation Plan and Demonstration of Attainment for 1-Hour SO<sub>2</sub> Nonattainment Areas indicates that Ohio EPA modeled attainment for Lake County, in part, by reducing, the currently permitted SO<sub>2</sub> rate of 7,473 lbs/hour for B001, B002, and B003 to 1,158.89 lbs/hour. However, this is not reflected in the rule. Ohio Administrative Code 3745-18-49(G) should read as follows:

The “Cleveland Electric Illuminating Company, Eastlake Plant” (OEPA ~~premise permit~~ number 0243160009) or any subsequent owner or operator of the “Cleveland Electric Illuminating Company, Eastlake Plant, 10 Erie Road, Willoughby, Ohio” shall not cause or

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permit the emission of sulfur dioxide from boiler numbers 1 through ~~5~~ 3 (OEPA source numbers B001 through ~~B005~~ B003) to exceed a maximum of ~~5.64 pounds of sulfur dioxide per MM Btu actual heat input~~ 1,158.89 lbs/hour from each boiler ~~[Reserved]~~.

FirstEnergy requests that Ohio EPA make this change (or an equivalent change expressed in pounds of sulfur dioxide per MM Btu actual heat input) for these boilers to reflect the limit used to model attainment in Lake County.

FirstEnergy appreciates the opportunity to submit these comments. If Ohio EPA has any questions, please do not hesitate to contact me at (330) 436-1404, or by email at [bkolts@firstenergycorp.com](mailto:bkolts@firstenergycorp.com).

Sincerely,



Brian P. Kolts  
Senior Scientist

By email and UPS Next Day Air