

Statement of Basis For Title V Permit

Company Name	First Energy - Lake Shore Plant	
Premise Number	1318000245	
Number of Non-insignificant Emissions Units	8	
What makes this facility a Title V facility?	Potential emissions of particulates, sulfur dioxide, nitrogen oxides, and hydrochloric acid.	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1	25-03		emission control action program

- **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

- If there were any "common control" issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	O t h e r							
B001 through B005	20% opacity as a 6-minute average	17-07(A)		N	Y	Y	Y	Y	N	These emissions units are considered to be inherently clean when fired with number two fuel oil. ET- If required, Method 9 shall be employed to demonstrate compliance with this emission limitation.
B006	20% opacity as a 6-minute average	17-07(A)		N	Y	Y	Y	Y	N	COMS ET- If required, Method 9 shall be employed to demonstrate compliance with this emission limitation.
B009	20% opacity as a 6-minute average	17-07(A)		Y	Y	Y	Y	Y	N	OR - This is an inherently clean emissions unit based upon our knowledge and experience in regulating these types of emissions units. The emissions unit shall only be fired with number two fuel oil. ET- If required, Method 9 shall be employed to demonstrate compliance with this emission limitation.
B001 through B004	0.10 lb/mmBtu	17-10(C)(1)		Y	Y	Y	Y	Y	N	OR - The ESP must be in operation when firing number 6 fuel oil with more than 1.25 weight percent sulfur. These emissions units are considered to be inherently clean when fired with number two fuel oil. ET- If required, Method 5 shall be employed to demonstrate compliance with this emission limitation. M, R, & Rp - The continuous opacity monitoring system will be used to ensure ongoing compliance with particulate emission limitation. Previous particulate emission tests conducted with all ESP fields in operation have show visible particulate emissions in compliance with the limitations specified in OAC rule 3745-17-07(A). Therefore, if the continuous opacity monitoring system data indicates opacity values in excess of the limitation, we would presume a potential compliance problem with the particulate emission limitation and would take appropriate actions as necessary.
B005	0.10 lb/mmBtu	17-10(C)(1)		N	Y	Y	Y	Y	N	This emissions unit is considered to be inherently clean when fired with number two fuel oil. ET- If required, Method 5 shall be employed to demonstrate compliance with this emission limitation.
B006	0.10 lb/mmBtu	17-10(C)(1)		N	Y	Y	Y	Y	N	

B009	.020 lb/mmBtu	17-10(B)(1)		Y	Y	Y	Y	Y	N	OR - This is an inherently clean emissions unit based upon our knowledge and experience in regulating these types of emissions units. The emissions unit shall only be fired with number two fuel oil. ET- If required, Method 5 shall be employed to demonstrate compliance with this emission limitation.
B001, B002, and B004	1.9 lbs/mmBtu	52.1881(b)(2 3)(xxviii)(A)		Y	Y	Y	Y	Y	N	OR - The quality of oil must meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation. ET -Compliance based upon fuel analyses and AP-42 calculations, sulfur dioxide emission tests will be performed if necessary.
B005	1.6 lbs/mmBtu	18-06(C)		Y	Y	Y	Y	Y	N	OR - The quality of oil must meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation. ET -Compliance based upon fuel analyses and AP-42 calculations, sulfur dioxide emission tests will be performed if necessary.
B009	0.5 lb/mmbtu	40 CFR Part 60.42c(d)		Y	Y	Y	Y	Y	Y	OR - The quality of oil must meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation. ET -Compliance based upon fuel analyses and AP-42 calculations, sulfur dioxide emission tests will be performed if necessary. Misc. - Requirement to permanently remove emissions unit B003 from service upon the installation of emissions unit B009.
F002 and F003	20% opacity as a 3-minute average	17- 07(B)(7)(b)		N	Y	Y	Y	Y	N	
F002 and F003	RACM	17-08(B)		N	Y	Y	Y	Y	N	
F002	20% opacity as a 3-minute average	17- 07(B)(7)(c)		N	Y	Y	Y	Y	N	
F002	no VEs except for 13 min. during any 60-min. period	17- 07(B)(7)(d)		N	Y	Y	Y	Y	N	

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

- **Instructions for Part III:**

- All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M”, “R”, “Rp” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

- Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.