

Statement of Basis For Title V Permit

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| Company Name | Ohio Edison, Edgewater Plant (Ohio Edison/First Energy Corp) | |
| Premise Number | 0247080049 | |
| Number of Non-insignificant Emissions Units | 10 | |
| What makes this facility a Title V facility? | Potential emissions of particulates, sulfur dioxide, nitrogen oxides and carbon monoxide. | |
| 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 |
| A.2 | 20 | Yes | 40 CFR Part 61 asbestos renovation and removal activities. |
| A.3 | NA | Yes | requirement to perform compliance demonstration for emissions units B001 and B002, prior to incorporating these units into the Title V permit, since the units have not been operated during the past six years |

? **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-) | Other | | | | | | | |
| B003 | 20% opacity as a 6-minute average | 17-07(A) | | N | Y | Y | Y | Y | N | The continuous opacity monitoring system will be used to ensure ongoing compliance with the visible particulate emission limitations. |
| B003 | 0.10 lb of PE/mmBtu | 17-10(C) | | N | Y | Y | Y | Y | N | The continuous opacity monitoring system will be used to ensure ongoing compliance with the particulate emission limitation. |
| B003 | 0.020 lb of PE/mmBtu | 17-10(B) | | N | Y | Y | Y | Y | N | The continuous opacity monitoring system will be used to ensure ongoing compliance with the particulate emission limitation. |
| B003 through B006 | 3.40 lbs of SO ₂ /mmbtu | | 40 CFR Part 52.1881(b)(20)(v) | Y | Y | Y | Y | Y | N | OR - The quality of the oil fired in these emissions units must meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation. 40 CFR Part 52.1881(b)(20)(v) only applies to emissions unit B006 when firing natural gas. The emission limitation from 40 CFR Part 60, Subpart Dc applies when firing oil. |
| B004 through B006 | 20% opacity as a 6-minute average | 17-07(A) | | N | 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 distillate oils (excluding number 4). ET- If required, Method 9 shall be employed to demonstrate compliance with this emission limitation. |
| B004 and B005 | .040 lb of PE/mmBtu | 17-11(B) | | N | 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 distillate oils (excluding number 4). ET- If required, Method 9 shall be employed to demonstrate compliance with this emission limitation. |
| B006 | 0.020 lb of PE/mmBtu | 17-10(B) | | 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 distillate oils (excluding number 4). ET- If required, Method 5 shall be employed to demonstrate compliance with this emission limitation. |

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| B006 | 0.5 lb of SO ₂ /mmBtu | | 40 CFR Part 60, Subpart Dc | 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. The emissions unit shall only be fired with distillate oils (excluding number 4). ET -Compliance based upon fuel analyses and AP-42 calculations, sulfur dioxide emission tests will be performed if necessary. |
| B006 | 4.51 lbs of SO ₂ /mmBtu | 18-53(A)(1) | | | | | | | | The sulfur dioxide emission limitation from this rule is less stringent than the emission limitations from 40 CFR Parts 52 and 60. |
| B006 | NA | 21-08 | | | | | | | | The permittee has satisfied the “best available control techniques and operating practices” required pursuant to OAC rule 3745-21-08 by committing to only fire natural gas and distillate oil in this emissions unit. |
| B006 | NA | 23-06 | | | | | | | | The permittee has satisfied the “latest available control techniques and operating practices” required pursuant to OAC rule 3745-23-06 by committing to only fire natural gas and distillate oil in this emissions unit. |
| F001 | opacity standards per applicable subsection of the rule | 17-07(B)(7)(a) | | N | Y | Y | Y | Y | N | |
| F002 | opacity standards per applicable subsections of the rule | 17-07(B)(7)(b)(c) and (d) | | N | Y | Y | Y | Y | N | |
| F002 through F004 | RACM’s req’d to minimize or eliminate visible emissions | 17-08(B)(6) | | N | Y | Y | Y | Y | N | |
| F003 and F004 | 20% opacity as a 3-minute average | 17-07(B)(7)(b) | | N | Y | Y | Y | Y | N | |
| F001 | RACM’s req’d to minimize or eliminate visible emissions | 17-08(B)(2) and (B)(8) | | N | Y | Y | Y | Y | N | |

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|---------------|--|-----------------------|---------------------------|---|---|---|---|---|---|--|
| P001 and P002 | | 17-07(A) and 17-11(B) | 40 CFR Part 60, Subpart Y | | | | | | | The emission limitations from these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05. |
| P001 | 5% opacity as a 6-minute average | 31-05 | | Y | Y | Y | Y | Y | N | OR - Thermal dryer temperature restriction based upon data from most recent compliance demonstration. ET - If required, the permittee shall demonstrate compliance with this emission limitation through emission tests. |
| P001 | 0.006 gr of PE/dscf and 2.6 lbs of PE/hr | 31-05 | | Y | Y | Y | Y | Y | N | OR - Thermal dryer temperature restriction based upon data from most recent compliance demonstration. ET - If required, the permittee shall demonstrate compliance with this emission limitation through emission tests. |
| P001 | 5.05 lbs of NOx/hr | 31-05 | | N | N | N | N | Y | N | M, R, and Rp - This emission limitation represents the emissions unit's potential to emit and is based upon firing natural gas at the emissions unit's maximum hourly firing capacity and the use of an AP-42 emission factor. ET - If required, the permittee shall demonstrate compliance with this emission limitation through emission tests. |
| P001 | 0.02 lb of SO2/hr | 31-05 | | N | N | N | N | Y | N | M, R, and Rp - This emission limitation represents the emissions unit's potential to emit and is based upon firing natural gas at the emissions unit's maximum hourly firing capacity and the use of an AP-42 emission factor. ET - If required, the permittee shall demonstrate compliance with this emission limitation through emission tests. |
| P001 | 0.31 lb of OC/hr | 31-05 | | N | N | N | N | Y | N | M, R, and Rp - This emission limitation represents the emissions unit's potential to emit and is based upon firing natural gas at the emissions unit's maximum hourly firing capacity and the use of an AP-42 emission factor. ET - If required, the permittee shall demonstrate compliance with this emission limitation through emission tests. |
| P001 | 3.02 lbs of CO/hr | 31-05 | | N | N | N | N | Y | N | M, R, and Rp - This emission limitation represents the emissions unit's potential to emit and is based upon firing natural gas at the emissions unit's maximum hourly firing capacity and the use of an AP-42 emission factor. ET - If required, the permittee shall demonstrate compliance with this emission limitation through emission tests. |
| P002 | 0.55 lb of PE/hr | 31-05 | | N | Y | Y | Y | Y | N | ET - If required, the permittee shall demonstrate compliance with this emission limitation through emission tests. |
| P002 | 5% opacity as a 6-minute average | 31-05 | | N | Y | Y | Y | Y | N | ET - If required, the permittee shall demonstrate compliance with this emission limitation through emission tests. |

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

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? **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.