

## Statement of Basis For Title V Permit

Company Name	Ohio Edison, R.E. Burger Plant (Ohio Edison/First Energy Corp)	
Premise Number	1707130015	
Number of Non-insignificant Emissions Units	12	
What makes this facility a Title V facility?	Potential emissions of particulates, sulfur dioxide, nitrogen oxides, volatile organic compounds, hydrochloric acid, and carbon monoxide.	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

<b>Part II (State and Federally Enforceable Requirements)</b>			
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	new source review requirements and requirement to perform compliance demonstration for emissions units B005 through B008, prior to incorporating these units into the Title V permit, since the units have not been operated during the past 5 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							
B009 through B012	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. ET- If required, Method 9 shall be employed to demonstrate compliance with this emission limitation.
B009 through B012	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.
B001 through B003	1.2 lbs of SO2/mmBtu	18-13(B)(1)		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.
B001 through B003, and P901	20% opacity as a 6-minute average	17-07(A)		N	Y	Y	Y	Y	N	Daily visible emission checks will be used to ensure ongoing compliance with the visible particulate emission limitations. ET- If required, Method 9 shall be employed to demonstrate compliance with this emission limitation.
B001 through B003	.062 lb of PE/mmBtu	17-11(B)		N	Y	Y	Y	Y	N	Daily visible emission checks will be used to ensure ongoing compliance with the visible particulate emission limitations. ET- If required, Method 5 shall be employed to demonstrate compliance with this emission limitation.
B009 through B012	9.02 lbs of SO2/mmBtu	18-13(B)(3)		N	Y	Y	Y	Y	N	ET -Compliance based upon fuel analyses, sulfur dioxide emission tests will be performed if necessary.
F001	opacity standards per applic subsection of the rule	17-07(B)(7)(a)		N	Y	Y	Y	Y	N	
F003	opacity standards per applic subsections of the rule	17-07(B)(7)(b)(c) and (d)		N	Y	Y	Y	Y	N	

F002 through F005, and P901	RACM's req'd to minimize or eliminate visible emissions	17-08 (B)(6)		N	Y	Y	Y	Y	N	
F002, F005 and P901	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	
P901		17-11(B)								The emission limitation from this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
P901	7.0 lbs of PE/hr	31-05		N	Y	Y	Y	Y	N	ET - Compliance based upon the absence of any visible emissions from baghouse. 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.