

Statement of Basis For Title V Permit

Company Name	Ohio Edison, W. H. Sammis Plant (Ohio Edison/First Energy Corp)	
Premise Number	1741160017	
Number of Non-insignificant Emissions Units	18	
What makes this facility a Title V facility?	Potential emissions of particulates, sulfur dioxide, nitrogen oxides carbon monoxide, volatile organic compounds 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
A.2	20	Yes	40 CFR Part 61 asbestos renovation and removal activities.

- **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-)	Oth er							
B002 through B006	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.
B002 through B006	0.062 lb of PE/mmBtu	17-11(B)(5)(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 number two fuel oil. ET- If required, Method 5 shall be employed to demonstrate compliance with this emission limitation.
B002 through B006	0.8 lb of SO ₂ /mmBtu	18-47(L)(2)		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 number two fuel oil. ET -Compliance based upon fuel analyses. Sulfur dioxide emission tests will be performed if necessary.
B007 through B013	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.
B007 through B013	0.10 lb of PE/mmBtu	17-10(C)(1)		N	Y	Y	Y	Y	N	The continuous opacity monitoring system will be used to ensure ongoing compliance with the particulate emission limitation.
B007 through B013	2.91 lbs of SO ₂ /mmBtu	18-47(L)(5)		N	Y	Y	Y	Y	N	The permittee has the option of meeting alternative sulfur dioxide emission limitations for these emissions units. The permittee may elect to have emissions units B007 through B010 comply with a sulfur dioxide emission limitation of 1.61 lbs/mmBtu (OAC rule 3745-18-47(L)(3)) and have emissions units B011 through B013 comply with a sulfur dioxide emission limitation of 4.46 lbs/mmBtu (OAC rule 3745-18-47(L)(4)).
F001	opacity standards per applic subsection of the rule	17-07(B)(7)(a)		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	
F002 through F006	20% opacity as a 3-minute average	17-07 (B)(7)(b)		N	Y	Y	Y	Y	N	
F002 through F006	RACM's req'd to minimize or eliminate visible emissions	17-08 (B)(6)		N	Y	Y	Y	Y	N	
F003	opacity standards per applic subsections of the rule	17-07 (B)(7) (c) and (d)		N	Y	Y	Y	Y	N	
F004	RACM's req'd to minimize or eliminate visible emissions	17-08 (B)(3)		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

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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.