



State of Ohio Environmental Protection Agency

OHIO E.P.A.

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NOV 25 2009

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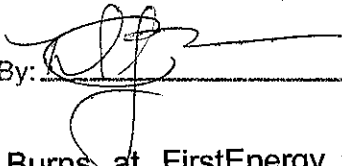
ENTERED DIRECTOR'S JOURNAL

NOV 25 2009

CERTIFIED MAIL

Mr. Fred J. Starheim, Manager
Permitting & Compliance
Environmental Department
FirstEnergy Generation Corporation.
76 South Main St.
Akron, OH 44308

I certify this to be a true and accurate copy of the
official documents as filed in the records of the Ohio
Environmental Protection Agency.

By:  Date: 11.25.09

Re: PTI exemption request for Biomass Test Burns at FirstEnergy Generation
Corporation, R.E. Burger Plant (Facility ID 0607130015)

Dear Mr. Starheim:

On October 26, 2009, Ohio EPA, Southeast District Office received your letter, dated October 23, 2009, requesting an exemption from applying for and obtaining a permit-to-install (PTI), pursuant to Ohio Administrative Code (OAC) rule 3745-31-03(A)(3)(d). FirstEnergy Generation Corporation plans to conduct biomass test burns in Boilers 7 and 8 (Ohio EPA Emissions Units B011 and B012) at its R.E. Burger Plant located near the village of Shadyside in Belmont County, Ohio. The purpose of each test burn is to research the co-firing of various biomass/coal fuel blends as encouraged by Senate Bill 221 and to determine the combustion efficiency of the fuel blends.

FirstEnergy Generation Corporation is requesting an exemption from permit modification requirements to conduct the biomass test burns for up to a six month period. My staff has informed me that these biomass test burns are scheduled to begin on or around November 30, 2009.

OAC rule 3745-31-03(A)(3)(d) allows the Director of Ohio EPA, at his/her discretion and in writing, to exempt the installation and operation or modification of an air contaminant source from the requirement to obtain a PTI for a period of up to six months, for the purposes of research and development of more effective prevention and control of air pollutant emissions or of more efficient combustion of coal.

FirstEnergy Generation Corporation, R.E. Burger Plant is proposing to utilize emissions units B011 and B012 for the above mentioned tests. These emissions units are equipped with electrostatic precipitators for particulate emissions control, and low nitrogen oxides (NOx) burners and selective non-catalytic reduction for NOx control.

Your letter states that you plan to co-fire up to 20% biomass fuels with coal in emissions units B011 and B012. The proposed biomass fuels are torrefied wood, compressed

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

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and/or extruded wood and agricultural products. The estimated total amount of biomass proposed to be burned during the trial period is 40,000 tons.

After considering your submittal, your request to conduct this temporary modification is granted, provided you comply with the following conditions:

1. This letter does not exempt the R.E. Burger Plant from compliance with any other applicable regulations.
2. The operation must be in accordance with the information contained in your request letter to Ohio EPA, dated October 23, 2009. Minor changes to the overall test plan can be made with prior approval from Ohio EPA Southeast District Office.
3. R.E. Burger Plant shall notify Mr. Dean Ponchak of Ohio EPA's Southeast District Office located at 2195 Front Street, Logan, Ohio, telephone number 740-380-5297, at the beginning and completion of the operation.
4. R.E. Burger Plant shall maintain records of the dates of operation and the amount of material burned each day of testing.
5. R.E. Burger Plant shall analyze representative samples of the biomass/coal fuel blend for ash content, sulfur content, heat content and moisture content, and keep records of the results.
6. R.E. Burger Plant shall summarize the NO_x, sulfur dioxide (SO₂) and visible particulate emissions data from the week prior to the burn and compare to the data from each respective test day to evaluate any potential emissions changes while burning the blended biomass/coal fuel.
7. R.E. Burger Plant shall conduct a stack test to determine carbon monoxide (CO) emissions while burning coal only to establish baseline CO emissions. R.E. Burger shall also conduct stack tests to determine CO emissions while burning the biomass/coal fuel blend. These tests shall be conducted at varying percent biomass/coal fuel blends so as to provide a representative indication of CO emissions at various levels of biomass content.
8. Personnel from Ohio EPA shall be permitted to witness each test burn and the stack tests to acquire data and information as necessary to ensure that the operation of the emissions unit and the stack testing procedures provide a valid characterization of the emissions from the emissions units.

A comprehensive written report on the results of each test burn, including continuous emissions monitoring data, emissions test data, and fuel analysis (see condition number 5) shall be submitted to Mr. Dean Ponchak of Ohio EPA Southeast District Office within 60 days following completion of the test burn exemption period.

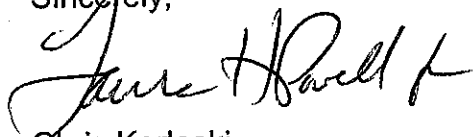
9. The results of the project evaluation and completion shall be kept on site and made available upon request.
10. This exemption period will begin with the initial installation of the temporary material handling equipment and shall be effective for six months thereafter.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Dean Ponchak of the Southeast District Office at (740) 380-5297.

Sincerely,



Chris Korleski
Director

cc: Mike Hopkins, Central Office, DAPC
Andrew Hall, Central Office, DAPC
Misty Parsons, Central Office, DAPC
Dave Morehart, Central Office, DAPC
Kara Philibin, Central Office, DAPC (2)
Dean Ponchak, Southeast District Office, DAPC
Bryan Zima, Legal Office
Drew Bergman, Director's Office