

Michael R. Beiting
Associate General Counsel

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Public Utilities Commission of Ohio
Docketing Division, Attn: E-Filing
180 East Broad Street
Columbus, Ohio 43215-3793

November 5, 2009

Re: Bay Shore Units 2, 3, and 4
Case No.09-933-EL-REN
Supplemental Information

Dear Secretary Jenkins:

Please find enclosed a letter from OEPA granting a PTI exemption request for burning biomass at the Bay Shore Plant. FirstEnergy agreed to supply this letter in its application at page 16, Attachment 2. This confirms our ability to commence test burn at Bay Shore Units 2, 3, and 4 using biomass fuel in accordance with the OEPA letter.

Please contact the undersigned if you have any questions about this submittal.

Sincerely,



Michael R. Beiting
Associate General Counsel
FirstEnergy Service Company

MRB

Enclosure

cc: Ann Hotz, Office of Consumers Counsel
Will Resinger, The Ohio Environmental Council



State of Ohio Environmental Protection Agency

OHIO E.P.A. MAILING ADDRESS:

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

ENVIRONMENTAL DEPARTMENT
TEL: (614) 644-3184 FAX: (614) 644-3184

OCT - 8 2009 P.O. Box 1049
Columbus, OH 43216-1049

ENTERED DIRECTOR'S JOURNAL

OCT 14 2009

October 8, 2009

Mr. Fred J. Starheim, Ph.D, CCM
Manager, Permitting and Compliance
FirstEnergy Generation Corp.
76 South Main Street
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: [Signature] Date: 10-8-09

Re: PTI exemption request for a Biomass Test Burn at Bay Shore Units 1 through 4

Dear Mr. Starheim:

I have received your letter dated September 18, 2009 requesting a temporary exemption to conduct the biomass test burn for up to six months from permit-to-install requirements. FirstEnergy Generation Corp. (First Energy) plans to conduct a biomass trial burn in the Units 1, 2, 3 and/or 4 (OEPA emissions units B006, B002, B003 and B004) at the Bay Shore facility located in Oregon, Ohio. The purpose of the test burn is to evaluate the feasibility of using renewable fuels as encouraged by Senate Bill 221 and determine the air quality impacts from the fuel change.

FirstEnergy Generation Corp. - Bay Shore Station is proposing to utilize the following existing boilers for the above mentioned tests.

B002 Unit 2 - 859 mmBtu/hr coal-fired boiler with low-NOx burners and ESP
B003 Unit 3 - 835 mmBtu/hr coal-fired boiler with low-NOx burners and ESP
B004 Unit 4 - 1,197 mmBtu/hr coal-fired boiler with low-NOx burners and ESP
B006 Unit 1 - 1,764 mmBtu/hr coke/coal-fired CFB boiler with baghouse

B002-B004 and B006 have SO2 and NOx continuous emissions monitoring systems (CEMS) and continuous opacity monitoring systems (COMS). B006 also has a CO CEMS.

It is my understanding that FirstEnergy will co-fire up to a 10% compressed and/or extruded wood and agricultural products with coke in Unit 1 and up to 5% compressed and/or extruded wood and agricultural products with coal in Units 2, 3, and/or 4. The biomass fuel will range in size from 8mm x 22mm pellets to 75mm x 25mm pucks.

OAC rule 3745-31-03(A)(3)(d) allows the Director of Ohio EPA at his discretion to exempt the installation and operation or modification of an air contaminant source from

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

the requirement to obtain a permit-to-install for a period of up to six months for purposes of research and development of more effective prevention or control of air pollutant emissions or of more efficient combustion of coal. After considering your submittal, your request to conduct the biomass trial burn is granted, provided you comply with the following conditions:

1. This letter does not exempt FirstEnergy from compliance with any other applicable regulations.
2. The operation shall be in accordance with the information contained in your request letter to the Toledo Division of Environmental Services and Ohio EPA, dated September 18, 2009.
3. FirstEnergy shall notify Matt Stanfield of the Toledo Division of Environmental Services at 348 South Erie Street in Toledo, Ohio, telephone number 419-936-3938, at the beginning and completion of the operation.
4. FirstEnergy shall maintain records of the dates of operation and the amount of material burned each day of testing.
5. FirstEnergy shall analyze representative samples of the biomass fuel, coal, and coke for ash content, sulfur content, heat content, moisture content, arsenic, beryllium, cadmium, manganese, chromium, copper, chlorine, lead, mercury, nickel, selenium, and zinc.
6. FirstEnergy shall summarize and make available to Ohio EPA the NO_x, SO₂ and CO CEMS data and COMS 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 and biomass/coke fuel.
7. FirstEnergy shall perform a stack test at the common stack serving B002 through B004 to determine CO emissions while burning coal only to establish baseline emissions and a stack test to determine CO emissions while burning the biomass/coal blend.
8. Personnel from the Toledo Division of Environmental Services shall be permitted to witness the test burn and acquire data and information as necessary to ensure that the operation of the emissions unit, the CO stack testing procedures, the NO_x, SO₂ and CO CEMS and COMS provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the test burn(s), including CEMS and COMS data, CO emission test data, and fuel analysis (see condition number 6) shall be signed by the person or persons responsible for the tests and

submitted to Matt Stanfield of the Toledo Division of Environmental Services within 30 days following completion of the test(s).

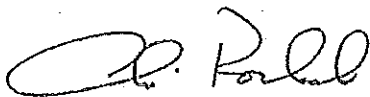
9. The results of the project evaluation and completion shall be kept on site and made available upon request.
10. This letter of exemption shall be effective on October 12, 2009 and shall expire on April 12, 2009.

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 Sudhir Singhal of the Division of Air Pollution Control in Central Office at (614) 644-3684 or Matt Stanfield of Toledo Division of Environmental Services at (419) 936-3938.

Sincerely,



Chris Korleski
Director

cc: Donald Vanterpool, Legal Office
Mike Hopkins, Central Office, DAPC
Bob Hodanbosi, Central Office, DAPC
Matt Stanfield, Toledo Division of Environmental Services
Sudhir Singhal, Central Office, DAPC
Terri Smith, Central Office, DAPC (2)

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in

Case No(s). 09-0933-EL-REN

Summary: Application OEPA Letter to make part of the application for Case 09-0933-EL-REN
Bay Shore Units 2-4 electronically filed by Mr. Joseph E Zuschak on behalf of FirstEnergy
Solutions