



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 7003 1010 0004 2923 4833
RETURN RECEIPT REQUESTED

January 11, 2010

M. Gail Twymon
FirstEnergy Corp.
76 South Main Street, 13th Floor
Akron, OH 44308

HIGH PRIORITY FACILITY
HIGH PRIORITY VIOLATOR – GC7

FACILITY ID: 13-18-00-0245

NOTICE OF VIOLATION: Failure to continuously monitor sulfur dioxide

Dear Ms. Twymon:

On January 7, 2010, the Cleveland Division of Air Quality (CDAQ) reviewed the second and third quarter 2009 emissions summary reports sent by Cleveland Electric Illuminating Co. – Lakeshore Plant (CEI) located at 6800 South Marginal Road in Cleveland. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations or air permit conditions.

CEI's operation of emissions unit B006: 2239 mmBtu/hr Coal-fired Utility Boiler for Electric Generation, is in violation of its Title V operating permit and Ohio Revised Code Section 3704.05(C) and (J)(2), in that the equipment to monitor sulfur dioxide emissions did not operate continuously. Between April 1st and June 30, 2009, emissions unit B006's continuous sulfur dioxide monitor did not operate 10.69% of the 159.11 hours of total operating time. Likewise, between July 1st and September 30, 2009, B006's continuous sulfur dioxide monitor did not operate 17.30% of the 508.63 hours of total operating time.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that CEI submit a corrective action plan to prevent such lengthy monitor downtime to the following enforcement representative:

Valerie Shaffer
Cleveland Division of Air Quality
75 Erieview Plaza, 2nd Floor
Cleveland, Ohio 44114-1839



Your written response to this letter must be received by CDAQ within fourteen (14) days of your receipt of this letter. If there is insufficient time to correct the alleged violations within this timeframe, your response must include a timeline for correcting the alleged violations.

Violations of Ohio air pollution laws and/or permit terms and conditions are subject to the penalties stipulated in Ohio Revised Code Section 3704.99(A), which allows fines of not more than twenty-five thousand dollars or imprisonment for not more than one year, or both, for each violation.

CDAQ issues this letter with Ohio EPA's concurrence. The failure to mention any specific violation does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Valerie Shaffer at (216) 664-6292. All correspondence with CDAQ must include the Ohio EPA facility identification number for CEI: 13-18-00-0245.

Sincerely,

George Baker
Chief of Enforcement

GB/vls

cc: John Babula, CEI Lakeshore Plant
Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318000245\2010-01-11 NOV.doc

February 2, 2010

Ms. Valerie Shaffer
Cleveland Division of Air Quality
75 Erieview Plaza, 2nd Floor
Cleveland, Ohio 44114-1839

Dear Ms. Shaffer:

RE: Lake Shore Plant - Facility ID 13-18-00-0245
Explanation of SO2 Monitor Downtime – Q2 and Q3 2009

We are responding to your letter dated January 11, 2010 and entitled: *“Notice of Violation for Failure to continuously monitor sulfur dioxide*, which we received on January 19, 2010.

As stated in my December 1, 2009 e-mail to you, we initially believed that sporadic operation and reduced manpower may have contributed to continuous emission monitoring system (CEMS) downtime during both the 2nd and 3rd quarters. Further investigation revealed that the preparer of the 2nd quarter, 2009 report inadvertently selected a different parameter than spelled out in Lake Shore’s Title V Permit resulting in the SO2 continuous emissions monitor software calculating 17 hours of monitor downtime. Using the parameter (SO2C), in accordance with the permit section A.IV.2, downtime for the SO2 monitor for 2nd quarter, 2009 is 0 hours. We will resubmit the second quarter report through Ohio EPA’s eBusiness Center. Also, personnel will be retrained in the calculation of CEMs monitor downtime.

Our investigation of the third quarter downtime revealed a problem with the boiler operating signal to the CEMs (July 8, 2009) resulting in approximately 51 hours being incorrectly flagged as out-of-control. Plant technicians identified the problem and the signal was re-established on July 10, 2009.

Additionally, we discovered that during this sporadic operation, the monitor would pass a calibration, then the boiler would be taken off-line; and upon being brought on line again, the CEMS software would flag data intermittently as out-of-control (even during the off line hours). Further investigation revealed that the data status indicator was toggled in the off position. This was corrected on January 27, 2010.

Calibration problems associated with the SO2 monitor account for the remaining downtime. A problem with moisture in the calibration manifold was resolved by purging the calibration manifold with cal gas.

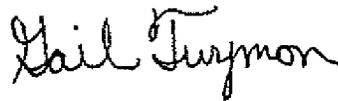
In addition, to resolve calibration drift issues, a new SO₂ monitor has been purchased for installation; and delivery and certification is scheduled for the end of February. Test notifications have been submitted. Short term steps (see bullet list below) are being taken to maintain reliability until the new monitor is installed. (Todd Brown is scheduled to witness the certification test.)

Please note the following:

- An early warning alert system has been implemented to notify various facility personnel and management of CEMS monitor calibration errors.
- Technicians are being retrained on responses to CEMS data flags and a review of calibration periods that impact valid data.
- A CEMS consultant has also been contracted to install the SO₂ monitor and review the CEMS operation with FirstEnergy personnel.

We apologize for the inadvertent errors in these reports and ask that you reassess our compliance based on the corrected information.

Sincerely,



M. Gail Twymon
Advanced Environmental Specialist

MGT

cc: J. Babula
R. Gould
D. Henslee
M. Krzywicki, CDAQ
J. Paulian, OEPA-CO
L. Holscher, USEPA Region V

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X <i>Joe Mason</i></p>
<p>1. Article Addressed to:</p> <p style="text-align: center;">FIRST ENERGY CORP. ATTN: M. GAIL TWYMON 76 SOUTH MAIN STREET, 13TH FLR AKRON, OH 44308</p>	<p>B. Received by (Printed Name) C. Date of Delivery</p> <p>Joe Mason X 1-19</p>
<p>2. Article Number (Transfer from service label)</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>PS Form 3811, August 2001</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p> <p style="text-align: center;">7003 1010 0004 2923 4833</p>