



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
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www.clevelandhealth.org

**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7003 1010 0004 2923 4871
RETURN RECEIPT REQUESTED**

March 15, 2010

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

HIGH PRIORITY FACILITY

**FACILITY ID: 13-18-00-0245
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Ms. Twymon:

On January 11, 2010, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation (NOV) requiring Cleveland Electric Illuminating Co. – Lakeshore Plant (CEI) to provide a corrective action plan for non-continuous sulfur dioxide emissions monitoring for CEI's emissions unit B006-2239 mmBtu/hr Coal-fired Utility Boiler. The NOV cited violations for the 2nd and 3rd quarters of 2009.

CDAQ is in receipt of a response letter dated February 2, 2010, which states that the preparer of the 2nd quarter report inadvertently selected the incorrect parameter in the continuous emissions monitoring software, which resulted in 10.69% downtime being reported. Additionally, CEI has submitted a revised quarterly report for the 2nd quarter electronically via Ohio EPA's *Air Services*. This revised report is dated February 8, 2010, and reports zero (0) hours of downtime covering April 1, 2009, through June 30, 2009.

Please note that if the incorrect parameter was selected in previous quarters that those associated quarterly reports should be corrected and resubmitted to CDAQ.

Regarding the 3rd quarter report, CEI's response letter states that a problem with the boiler operating signal contributed to approximately 51 hours of incorrectly reported downtime. This letter also reports calibration problems associated with the monitor which added to the total 3rd quarter downtime. Todd Brown with the Compliance Monitoring Unit of Ohio EPA's Division of Air Pollution Control has assured CDAQ that CEI has demonstrated that the appropriate monitoring data for sulfur dioxide emissions was collected during 51 of the total 88 hours of initially reported downtime for the 3rd quarter.

Lastly, CEI's letter stated that a new sulfur dioxide monitor would be installed and would resolve calibration drift issues. The new monitor was installed at CEI on February 25, 2010.



CEI's response letter was received in a timely manner and appropriate steps were taken to bring the source into compliance. CDAQ has determined that no further enforcement action is warranted at this time, but reserves its right to take such action in the future if necessary.

CDAQ issues this letter with Ohio EPA's concurrence and 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, CDAQ

GB/vls

cc: John Babula, First Energy Lake Shore 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 NEAR.doc

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First Energy Corp.
 M. Cecil Pwyzmon
 76 South Main St., 13th Flr
 Akron, OH 44308

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(Transfer from service label)

7003 1010 0004 2923 4871

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