

CITY OF TOLEDO



DEPARTMENT OF PUBLIC UTILITIES

March 11, 2010

CERTIFIED MAIL

Mr. Charles R. Ferrell
Director
First Energy Generation Corporation
Bay Shore Power Plant
4701 Bay Shore Road
Oregon, Ohio 43616

Re: Warning Letter for Fugitive Dust Emissions

Dear Mr. Ferrell:

Toledo Division of Environmental Services (TES) personnel responded to a citizen complaint on March 5, 2010 regarding fugitive dust emissions on Bay Shore Road in front of the Bay Shore Plant. Trucks exiting the Bay Shore Plant are tracking ash from the facility onto Bay Shore Road. On March 5, TES personnel recorded 7 minutes and 24 seconds of visible emissions during a 20 minute observation period on Bay Shore Road in front of the Bay Shore Plant.

TES was informed that the reason for visible emissions on Bay Shore Road last week was due to the sweeping contractor's vacuum truck being broken down. Instead of using a vacuum sweeper, the sweeping contractor used a broom sweeper which was not effective at removing ash from the roadway. Bay Shore Plant personnel informed TES that they looked for, and found a different contractor with a vacuum sweeper. The new contractor began cleaning Bay Shore Road on Sunday.

I drove by the Bay Shore facility on March 9 and found that there was much less ash material on Bay Shore Road than there was last week. I did not see dust being generated by traffic on Bay Shore Road. However, the vacuum sweeper itself was in operation and generating some fugitive dust emissions - either by ash not being captured by the sweeper, or from dust being exhausted from the vacuum.

Timothy D. Murphy, Commissioner
DIVISION OF ENVIRONMENTAL SERVICES
Quilter Environmental Center

348 South Erie Street, Toledo, Ohio 43604-8633 USA

Telephone: 419-936-3015 Fax: 419-936-3959 E-mail: tim.murphy@toledo.oh.gov

Due to quick action taken by Bay Shore Plant personnel to arrange for equipment to vacuum Bay Shore Road, we are sending a warning letter, rather than a Notice of Violation. Our office first warned the Bay Shore Plant of the issue of tracking ash onto Bay Shore Road by Certified Mail on April 12, 2006. Please note that unless permanent measures are implemented by First Energy to prevent tracking of ash onto Bay Shore Road, First Energy needs to continue being attentive to promptly removing ash tracked on to Bay Shore Road.

If you have any questions, please feel free to contact me at 419-936-3938.

Sincerely,



Matthew A. Stanfield
Staff Professional Engineer

Enclosure

cc: Tim Murphy
Karen Granata
Joyce Anagnos
John Paulian, OEPA
Lisa Holscher, USEPA Region V