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August 13, 2013

Ellen Riley
Office of Regional Counsel
U.S. EPA Region 5 (SC-5J)
77 W. Jackson Blvd.
Chicago, IL 60604

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Re: *FirstEnergy Generation Corp., Supplemental Environmental Project (SEP) Consent Agreement and Final Orders(CAFOs) – Docket Nos. CWA-05-2013-0004, CWA-05-2013-0005, and CWA-05-2013-0005*

Dear Ms. Riley:

The following SEP completion report is being submitted in accordance with the above-referenced CAFOs:

a. Detailed description of the SEP as completed

FirstEnergy's SEP protects and maintains ecologically and environmentally important property along Lake Erie, in perpetuity, through donation of over 194 acres of property to CVG, LLC, a wholly owned subsidiary of the Western Reserve Land Conservancy, along with a \$40,000 conservation fee. The property consists of high quality forested wetlands, and bedrock streams that provide direct benefits by reducing adverse impacts to the Lake Erie watershed.

b. Copy of the fully executed deed donating and transferring fee title of the 194.52 acres of land, part of parcels 28-036-00-002-00 and/or 28-036-00-004-00, to WRLC;

See enclosed fully executed quit claim deed. Also enclosed is a copy of a \$47,309.12 wire transfer payment of the \$40,000 conservation fee and closing costs.

c. Certification that Respondent has completed the SEP in compliance with this CAFO; and

I certify that FirstEnergy Generation Corp. is not required to perform or develop the SEP by any law, regulation, order, or agreement or as injunction relief as the date that I am signing this CAFO. I further certify that FirstEnergy Generation Corp. has not received, and is not negotiating to receive, credit for the SEP in any other enforcement action.

I certify that FirstEnergy Generation Corp. is not a party to any open federal financial assistance transaction that is funding or could be used to fund the same activity as the SEP. I further certify that, to the best of my knowledge and belief after reasonable

inquiry, there is no such open federal financial transaction that is funding or could be used to fund the same activity as the SEP, nor has the same activity been described in an unsuccessful federal financial assistance transaction proposal submitted to EPA within two years of the date that I am signing this CAFO (unless the project was barred from funding as statutorily ineligible). For purposes of this certification, the term "open federal financial assistance transaction" refers to a grant, cooperative agreement, loan, federally-guarantee or other mechanism for providing federal financial assistance whose performance period has not expired.

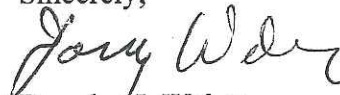
d. Description of the environmental public health benefits resulting from each SEP (quantify the benefits and pollution reductions, if feasible).

The SEP will provide pollution prevention and ecological benefits far exceeding any adverse effects from the oil spills that were quickly and effectively contained and remediated. Wetlands, particularly these high quality wetlands, are known to improve water quality through removal of suspended solids, and absorption of excess nutrients. Although the spills at the Bay Shore, Edgewater and Lake Shore plants involved petroleum, EPA's SEP policy provides that a "SEP may have sufficient nexus even if the SEP addresses a different pollutant in a different medium." (pages 5-6.)

FirstEnergy's SEP is particularly important given the location of these wetlands near a highly developed industrial area along Lake Erie. Preservation of these wetlands will not only provide continued reduction of pollutants within the Lake Erie watershed near an existing industrialized area but also provide habitat for a diverse species of plants and animals (including rare, threatened and endangered species, such as the Indiana bat, Small Fringed Gentian, Striped Maple, Appalachian Sedge, and Gray Birch). These continued habitat benefits, in perpetuity, also help to offset impacts to plants or animals from the petroleum spills.

I certify that I am familiar with the information in this document and that, based on my inquiry of those individuals responsible for obtaining the information, it is true and complete to the best of my knowledge. I know that there are significant penalties for submitting false information, including the possibilities of fines and imprisonment for knowing violations.

Sincerely,



Douglas J. Weber

Sr. Corporate Counsel II

Enclosures

cc:

Karen Peaceman

Regional Hearing Clerk

David Wareham (w/o enclosures)