

76 South Main Street Akron, Ohio 44308

1-800-646-0400 March 6, 2020

Tanowa Troupe Docketing Division The Public Utilities Commission of Ohio 180 East Broad Street Columbus, OH 43215-3793

### Letter of Notification Hanna-Newton Falls 138 kV Transmission Line Rebuild Project <u>Case No. 19-1857-EL-BLN</u> Supplemental Information

Dear Ms. Troupe:

Please find enclosed a copy of the Storm Water Pollution Prevention Plan for the Hanna-Newton Falls 138 kV Transmission Line Rebuild Project.

As requested by Staff in the Staff Report of Investigation, recommended Condition #1, we are submitting this additional information into the docket. The remaining permits and approvals for this Project will be docketed as they are received.

Should the Ohio Power Siting Board desire further information or discussion of this submittal, please contact me at (330) 384-2526.

Sincerely,

Scott M. Humphrys Transmission Siting Supervisor Energy Delivery Transmission and Substation Design FirstEnergy Service Company

Attachments



Mike DeWine, Governor Jon Husted, Lt. Governor Laurie A. Stevenson, Director

Mar 03, 2020

ATSI, a FirstEnergy Company Amanda Habershaw 76 South Main Street Akron, OH 44308

Re: Approval Under Ohio EPA National Pollutant Discharge Elimination System (NPDES) - Construction Site Stormwater General Permit - OHC000005

Dear Applicant,

Your NPDES Notice of Intent (NOI) application is approved for the following facility/site. Please use your Ohio EPA Facility Permit Number in all future correspondence.

Facility Name:	Hanna-Newton Falls 138kV Transmission Line Rebuild
Facility Location:	Portage County and Trumbull County, Ohio
City:	Multiple
County:	Trumbull
Township:	
Ohio EPA Facility Permit Number:	3GC11406*AG
Permit Effective Date:	Mar 03, 2020

Please read and review the permit carefully. The permit contains requirements and prohibitions with which you must comply. Coverage under this permit will remain in effect until a renewal of the permit is issued by the Ohio EPA.

If more than one operator (defined in the permit) will be engaged at the site, each operator shall seek coverage under the general permit. Additional operator(s) shall submit a Co-Permittee NOI to be covered under this permit. There is no fee associated with the Co-Permittee NOI form.

Please be aware that this letter only authorizes discharges in accordance with the above referenced NPDES CGP. The placement to fill into regulated waters of the state may require a 401 Water Quality Certification and/or Isolated Wetlands Permit from Ohio EPA. Also, a Permit-To-Install (PTI) is required for the construction of sanitary or industrial wastewater collection, conveyance, storage, treatment, or disposal facility; unless a specific exemption by rule exists. Failure to obtain the required permits in advance is a violation of Ohio Revised Code 6111 and potentially subjects you to enforcement and civil penalties.

To view your electronic submissions and permits please Logon in to the Ohio EPA's eBusiness Center at http://ebiz.epa.ohio.gov.

If you need assistance or have questions please call (614) 644-2001 and ask for Construction Site Stormwater General Permit support or visit our website at http://www.epa.ohio.gov.

Sincerely,

hamie & Stevenson

Laurie A. Stevenson Director

Hanna-Newton Falls 138 kV



Portage County and Trumbull County, Ohio

### COVER PAGE

Storm Water Pollution Prevention Plan is prepared in accordance with the Ohio Environmental Protection Agency (EPA), National Pollutant Discharge Elimination System (NPDES) Permit No. OHC000005 for Storm Water Discharges Associated with Construction Activity (General Permit). References to the General Permit are identified beginning with "Part".

Project Name and Location:	Hanna-Newton Falls 138kV Transmission Line Rebuild	
	Portage County and Trumbull County, Ohio	
Anticipated Schedule:	March 2020 to February 2021	
Project Owner / Site Operator:	American Transmission Systems, Incorporated (ATSI) (A FirstEnergy Company) 76 South Main Street Akron, Ohio 44308	
Project Contact:	Amanda B. Habershaw - FirstEnergy Corp. 800 Cabin Hill Drive Greensburg, PA 15601 Ph.: (724) 830-5971	
Authorized Representative:	Amanda B. Habershaw - FirstEnergy Corp. 800 Cabin Hill Drive Greensburg, PA 15601 Ph.: (724) 830-5971	
Prepared by:	GPD Group 520 South Main Street, Suite 2531 Akron, Ohio 44311	
Preparation Date:	January, 2020. LEONARDO A. SFERRA E -71842 G/STER G/STER JONAL	

**Storm water Pollution Prevention Plan** 

Hanna-Newton Falls 138 kV

#### Hanna-Newton Falls 138 kV

### Portage County and Trumbull County, Ohio

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### APPENDICES

- A. CONTRACTOR'S CERTIFICATION STATEMENT INSPECTION/MAINTENANCE LOGS TRAINING LOG DISTURBANCE AND STABILIZATION LOG.
- B. STANDARD EROSION CONTROL DETAILS
- C. NPDES PERMIT NO. OHC000005
- D. USDA SOIL REPORT
- E. OHIO EPA NOI AND CO-PERMITTEE APPROVALS
- F. CONSTRUCTION SCHEDULE

# 1.0 MANAGEMENT CERTIFICATION [Part V.H.]

I, the undersigned, certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Signature:

Type text here

Name:

Amanda B. Habershaw

Title:

Supervisor, Energy Delivery Permitting

Date Approved:

02/26/2020

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# 2.0 CONTRACTOR'S CERTIFICATION [Part III.E]

All contractors and subcontractors engaged in land disturbance activities that may result in the introduction of sediment and/or other pollutants to storm water are required to review and understand the terms and conditions of the General Permit and this Storm Water Pollution Prevention Plan (SWP3).

The contractors or subcontractors shall sign the Contractor's Certification Statement (Appendix A) following this review. This statement indicates that the contractor or subcontractor acknowledges and accepts responsibility for compliance with the terms and conditions of this SWP3 and the control measures and best management practices (BMPs) contained herein, and is familiar with the terms of the General Permit (OHC000005).

# 3.0 PROVISIONS FOR PLAN REVISIONS [Part III.D]

The proposed construction control measures, BMPs, inspection schedules, and other provisions presented in this SWP3 represent anticipated minimum controls based upon the available project information. It is the responsibility of the on-site construction supervisor, contractors, subcontractors, and qualified inspection personnel, with input from the project engineer, to recognize and implement any changes to this SWP3 that may be needed during the period of construction.

The SWP3 is required to be amended whenever there is a change in design, construction, operation, or maintenance that has a significant effect on the potential for the discharge of pollutants to surface waters of the state, or if the plan or controls prove to be ineffective in achieving the general objectives of controlling pollutants in storm water discharges associated with construction activity. Any plan amendments, revisions, or modifications will be documented on page 3 (Plan Revision Log).

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### PLAN REVISION LOG

REV. NO.	REV. DATE	PREPARED BY NAME/INITIAL	REVIEWED BY NAME/INITIAL	DESCRIPTION

Hanna-Newton Falls 138 kV

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# 4.0 SITE AND PROJECT DESCRIPTION [Part III.G]

Project Name:	Hanna-Newton Falls 138kV Transmission Line Rebuild
Project Location:	Portage County and Trumbull County, Ohio
Project Owner:	American Transmission Systems, Incorporated (ATSI) A FirstEnergy Company 76 South Main Street, Akron, Ohio 44308

This SWP3 has been developed to address the Storm water runoff from construction areas and prevent storm water pollution.

a) Nature and Type of Activity (Part III.G1a): The project described in this SWP3 is being conducted by American Transmission Systems, Incorporated (ATSI). The project includes the rebuilding of transmission lines, addition mid span structures and the replacement of poles of 138 kV overhead electric transmission lines. The project will take place in Paris Township, Charlestown Township, Ravenna Township and Rootstown Township in Portage County and Braceville Township and Newton Township in Trumbull County, Ohio. The transmission line trails in farmlands and undeveloped wooded areas. The total length of the transmission line is approximately 20.4 miles.

The latitude and longitude along the linear project starts and terminates approximately as per table below.

START	TERMINATES
(Existing Newton Falls Substation located at 3391 Warren-Ravenna Road in Newton Falls, Ohio)	(Existing Hanna Substation located at 4650 Sandy Lake Road in Ravenna, Ohio)
41.2065	41.1200
-80.9431	-81.2275

The anticipated amount of soil disturbance within the transmission line ROW will be based on the construction activities being performed in each area. The construction will primarily consist of replacement of wood poles and related hardware and install new H-Frame steel structures. In order to facilitate installation of the new poles, H-Frame steel structures, conductors and transmission line, soil-disturbing activities may include the clearing of existing vegetation for temporary access routes, pull sites and laydown areas (if matting is not used) and the clearing of vegetation and limited grubbing in the vicinity of replacement pole locations, and the potential placement of gravel or construction mats for access routes and equipment/material laydown areas. The equipment/material areas include pull pads (locations where wire storage and tensioning occurs), laydown yards (locations where equipment and materials are stored and staged) and guard structure locations (locations where existing power lines are structurally supported above road crossings and other ground activities). Areas of soil disturbance will be protected with the specified minimum erosion and sediment controls BMP's identified in Appendix B and stabilized in accordance with Section 6.0. If additional soil disturbance activity is required, supplementary erosion and sediment controls will be required in order to provide protection from sedimentation to adjacent properties. Minor temporary crossing of surface waters, as necessary, will be made utilizing construction matting, steel plates, and/or other BMPs to minimize disturbance. Following construction, these crossing areas will be stabilized and restored appropriately.

No new, permanent surface changes are anticipated; segments of construction that are not part of existing installations will be returned to pre-construction conditions at the conclusion of the project.

The project corridor is located in the general vicinity of a number of named streams and unnamed tributaries. Detailed information, including corridor crossing locations and names of streams (where available) in the vicinity of the project corridor, is presented in Item 5h. The project is related only to the rebuild of existing transmission line, installing H-Frame steel structures and pole replacements.

A project overview map is included as Figure 1. Maps depicting the local soil types are provided in Appendix D. Color aerial photographs of the project area depicting the transmission line and

access routes and structures are provided on Figures 2-1 through 2-49. Example drawings, specifications, and installation methodologies for erosion and sediment control practices are included in Appendix B.

Site Area (Part III.G1b): The total project area includes approximately 20.4 mile b) transmission line corridor and any temporary construction access routes and pull sites located outside of the transmission line ROW. This total project area is estimated to be approximately 173 acres. Of this, the total area of the project that is planned to be disturbed under the definition provided in Part VII.K (alteration of land surface where natural or man-made cover is destroyed in a manner that exposes the underlying soils) is conservatively anticipated to be up to 55.7 acres, the total anticipated area of disturbance is composed of sporadic small areas of disturbance along the total length of the project. This estimate assumes that the entire length of the access routes outside paved areas will result in disturbance if matting is not used. The standard access roads will have an 8 inch cut and placement of 8 inch gravel, after completion of work the gravel will be covered with backfill/topsoil, if stone removal is requested then stone will be carefully scraped out and area will be covered with backfill/topsoil. For access roads in floodplain the cut will be 12 inch and 8 inch gravel will be placed and later after construction 4 inch of backfill/topsoil is placed to match grade with existing. All efforts will be made during construction to minimize this disturbance and the actual disturbed area is anticipated to be less than the estimated cumulative 55.7 acres. Temporary sediment and erosion control measures will be used as needed throughout construction to prevent sediment migration and to protect nearby sensitive features such as streams or wetlands. Disturbed areas will be re-seeded following construction, as appropriate, and the temporary sediment and erosion control measures used during construction will be removed within thirty (30) days after final site stabilization.

*c) Impervious Areas (Part III.G1c):* The impervious areas that currently exist within the project area are primarily roadways, driveways, and similar features. Construction access routes will be temporary and constructed of pervious soil, construction matting, and/or DGA/gravel materials; therefore the percentage of imperviousness is not anticipated to change.

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Hanna-Newton Falls 138 kV Pole Replacement Project

*d)* **Runoff Coefficients (Part III.G1d):** As described above, the limited placement of gravel materials for this project (primarily associated with construction access, pads, and similar features) will result in a *de minimis* effect on existing runoff conditions. For this reason, the post-construction runoff coefficients for this project will effectively be consistent with the preconstruction conditions.

e) Existing Soil Data (Part III.G1e): According to the United States Department of Agriculture (USDA) Web Soil Survey, the soil series within the site area primarily include Bogart-Haskins comp, Canadice silt Ioam, Chili Ioam, Chili gravelly Ioam, Chili silt Ioam, Chili-Oshtemo complex, Ellsworth silt Ioam, Fitchville silt Ioam, Geeburg silt Ioam, Geeburg-Urban Iand complex, Geeburg and Glenford silt Ioam, Glenford silt Ioam, Haskins Ioam, Holly silt Ioam, Lorain silty clay Ioam, Loudonville silt Ioam, Mahoning silt Ioam, Orrville silt Ioam, Remsen silt Ioam, Rittman silt Ioam, Sebring silt Ioam, Caneadea silt Ioam, Carlisle muck, Damascus Ioam, Jimtown Ioam, Lakin Ioamy fine sand, Mitiwanga silt Ioam, Oshtemo sandy Ioam, Rawson silt Ioam, Seward Ioamy fine sand and Tioga Ioam. The hydrologic rating group, slopes and percentages of soils are given in USDA soil report (Appendix D). The majority of soils in the project area generally have a moderate to Iow infiltration rates when already saturated.

**f) Prior Land Use (Part III.G1f):** The proposed project is located in Portage County and Trumbull County, Ohio and will predominately be performed in areas of existing FirstEnergy easement. Land use in the area is primarily areas of residential, commercial and is exempt property owned by USA. Some residences are located at the project perimeter or adjacent to the access routes. These residents will be informed of the proposed project by ATSI. Work efforts shall take special care for any sensitive land use areas located within the project area.

*g)* **On-Site Stream Condition (Part III.G1g):** No disturbance to any channels or streams are anticipated as part of this project, construction matting will be used for any wetlands or stream crossings.

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*h)* **Schedule (Part III.G1h):** Project construction is expected to begin early in March 2020 (preliminary vegetation clearing activities) and will be completed February 2021. ATSI or their contractors will install the erosion and sediment control measures for the project construction. These measures are primarily anticipated to include the installation of silt fence or similar media (i.e., filter socks) around all disturbed areas and in appropriate locations along access routes (near sensitive environmental features and steep sloped areas >5%). The installed erosion and sediment control measures will not be removed until permanent stabilization has occurred (e.g., restoration of vegetation, etc.). Due to the linear nature of the transmission line construction activities, calendar dates for the activities above cannot be specified (likely start in March 2020). However, the requirements will be communicated to the contractor and the general schedule considerations will be noted on the project schedule.

*i)* **Receiving Waters (Part III.G1i):** The proposed project corridor will cross a number of named and unnamed streams apart of West Branch and Lake Milton.. Where possible, access locations and connected access roadways are configured to avoid stream crossings. This project is located in Portage County and Trumbull County, Ohio. This project does not have defined or concentrated discharge points to any city/township MS4.

As described in Item 5a, permanent disturbance to streams or wetlands are not anticipated as part of this project. In minimal areas where minor temporary crossings of wetlands are required to facilitate access, construction matting, steel plates, and/or other appropriate BMPs will be used to minimize disturbance, in accordance with all applicable permit requirements. A temporary crossing detail for wetland and stream areas is provided in Appendix B.

The following table lists streams spanned by the overhead transmission line. Aerial crossings that are not physical (i.e. no bridging, culverts, or other crossings required) are listed as "Spanned Only". When applicable, crossings that are physical are listed as "Access Road". The overall intent of the access road planning is to avoid jurisdictional waters wherever possible. Based on surface water delineation (in ROW) and a desktop study of NHD data, and topographic conditions, no structural encroachment or filling of jurisdictional waters will be required to support access requirements for the project. If a temporary stream crossing is deemed necessary based on a change in project scope, crossings will be made by bridging

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with construction matting with no impact to these features. In the event that bridging is infeasible at a particular location and a temporary fill (e.g., culvert) is required, USACE permits will be obtained and an approved temporary crossing will be installed. Additionally, this SWP3 will be updated with appropriate BMPs for these features.

Excess soils generated during installation of direct-embedded pole structures shall be transported outside of stream and wetland areas for management / placement.

Based on current information, no physical crossings of streams will be required. Therefore, all streams crossed by the transmission line are listed as "Spanned Only".

Name of Stream	Type of Crossing	Latitude	Longitude
S-1	Spanned Only	41.20620	-80.94260
S-2	Spanned Only	41.19020	-80.93860
S-3	Spanned Only	41.18800	-80.93860
S-4	Spanned Only	41.18690	-80.93860
S-5	Spanned Only	41.18710	-80.93860
S-6	Spanned Only	41.16910	-80.94620
S-7	Spanned Only	41.16260	-80.95770
MAHONING RIVER	Spanned Only	41.159700	-80.962200
KALE CREEK	Spanned Only	41.149400	-80.987300
S-8	Spanned Only	41.14960	-80.98830
S-9	Spanned Only	41.14740	-81.02750
S-10	Spanned Only	41.14740	-81.04580
S-11	Spanned Only	41.14740	-81.04610
S-12	Spanned Only	41.14740	-81.05600
S-13	Spanned Only	41.15580	-81.07430
W.B. MAHONING	Spanned Only	41.156800	-81.074800
S-14	Spanned Only	41.15740	-81.07540
S-15	Spanned Only	41.16060	-81.09510
S-16	Spanned Only	41.15830	-81.10200
S-17	Spanned Only	41.15700	-81.10530

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S-18	Spanned Only	41.15640	-81.10740
S-19	Spanned Only	41.15580	-81.10910
S-20	Spanned Only	41.15470	-81.11800
S-21	Spanned Only	41.15430	-81.12020
S-22	Spanned Only	41.15430	-81.12000
S-23	Spanned Only	41.15360	-81.12640
S-24	Spanned Only	41.15330	-81.12880
S-25	Spanned Only	41.15320	-81.12920
S-26	Spanned Only	41.15280	-81.13270
S-27	Spanned Only	41.15270	-81.13380
S-28	Spanned Only	41.15240	-81.13560
S-29	Spanned Only	41.15210	-81.13830
S-30	Spanned Only	41.15060	-81.15200
S-31	Spanned Only	41.15010	-81.15580
S-32	Spanned Only	41.14950	-81.16150
S-33	Spanned Only	41.14830	-81.18410
W.B. MAHONING	Spanned Only	41.14840	-81.19230
ANABRANCH	Matted Crossing	41.14770	-81.19420
S-34	Spanned Only	41.14480	-81.20010
S-35	Spanned Only	41.14530	-81.20340
S-36	Spanned Only	41.14500	-81.20470
S-37	Spanned Only	41.14290	-81.21290
S-38	Spanned Only	41.14220	-81.21550
S-39	Spanned Only	41.13730	-81.22780
S-40	Spanned Only	41.12860	-81.22560
S-41	Spanned Only	41.16360	-81.08000
S-42	Spanned Only	41.16420	-81.08910
S-43	Spanned Only	41.13450	-81.22590
S-44	Spanned Only	41.12060	-81.22750

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- *j)* **Subdivided Developments (Part III.G1j):** This is not a project involving subdivided developments. This part is not applicable.
- k) Asphalt and Concrete Discharges (Part III.G1k): This project does not involve asphalt or concrete production plant associated discharges. Localized concrete washout pit shall be utilized where installation of concrete takes place.

*I)* **Cover Page and Contact Information (Part III.G1I):** A cover page meeting the requirements of this part has been provided (see page 1).

*m)* Log Documenting (Part III.G1m): Appendix A has been prepared to provide the required recordkeeping logs, including those to document contractor review/acceptance of this SWP3, stabilization activities, applicable training, and routine inspections. ATSI and their contractors are responsible for completing and maintaining the records required under this permit. A log to record amendments to this SWP3 is provided on page 3. Additional information on inspections and recordkeeping is also provided in Section 7.0.

*n)* Site Maps (Part III.G1m): The General Permit describes a number of items that should be shown on the site maps provided for the project. Given the nature and linear extent of the project, it is impractical to include all of these items on the site maps. Instead, a number of these items will be described in this section, and others will be shown on the site maps, as practical and appropriate.

The various project maps provided with this SWP3 include the following:

- A project overview map is included as Figure 1.
- Soils map is provided in Appendix D.
- The project site and erosion and sediment control maps are provided as Figure 2-1 thru 2-49 and included the entire, approximately 20.4 miles transmission line route.

The following items are required by the General Permit Part III, Item G1n:

Limits of Disturbance: The limits of disturbance are described throughout this SWP3 and are

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primarily related to the laydown yards, pull and guard sites, temporary construction access routes, additional mid span structures, and pole locations. The total area of the transmission line ROW is approximately 173 acres, and the total area of disturbance is anticipated to be limited to a maximum of 55.7 acres. The areas of anticipated earth disturbance within the project limits are as follows:

- Temporary Construction Access Routes (Gravel with no rise in elevation): Access routes to each pole location are required. In general, existing routes will be utilized when possible, however up to 36.2 acres of disturbance may be associated with the construction of new access routes. The total length of access routes is estimated to be approximately 105,142 feet. The 36.2 acre estimate assumes a 15-foot access route width (105,142 \* 15 feet = 1,577,130 square feet = 36.2 acres).
- Pads, including Temporary Equipment/Material Laydown, and Pole Areas: It will be necessary to construct a number of different pad types and temporary equipment areas, including pull sites, guard locations, laydown areas, turn around areas, pole work locations for additional mid span structures, and existing/replacement pole installations. BMPs will be installed at the perimeter of these locations if they have a potential for earth disturbance. The total disturbance for these areas is conservatively estimated to be 19.5 acres.
- Equal Potential Zone (EPZ) and/or timber matting will be placed within the above described areas wherever possible in such a way that does not disturb the existing condition. Any temporary impact associated with the placement or removal of these mattings will be restored by the contractor to a condition equal to or better than the existing condition. Areas which are properly matted are not considered as disturbed areas.

<u>Soil Types:</u> The soil types within the project limits are described in Item 5e above. Appendix D provides a soils report for the project area.

<u>Contours</u>: Due to the linear nature of this project, it is not anticipated to have any permanent contour changes. Existing contour data has been shown on the provided maps. The placement

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of fill materials, if any, will be limited to the installation of layout pads or updated access roads. Construction activities will not result in the delineation of a new watershed.

<u>Riparian setbacks</u>: Contractor shall reaffirm with governing authority to stay outside of riparian setbacks.

<u>Conservation easements</u>: Contractor shall reaffirm with governing authority to stay outside of conservation easements.

<u>Surface Waters:</u> The tributaries, streams, and wetland areas within the project vicinity are depicted on Figures 2-1 through 2-49. The depicted streams and wetlands are based on a formal surface water delineation (in ROW) and desktop review of NHD and NWI data and formal surface water delineation by a team of qualified ecologists. Surface waters will not be permanently impacted by the construction activities associated with the project. Storm and surface water within the project vicinity ultimately discharges to the streams that are identified in Item 5i. The project is related only to the rebuild of an existing transmission line, addition of mid span structures, and replacement of power poles.

<u>Locations of Buildings, Roads, Parking, and Utilities:</u> The locations of existing features (e.g., buildings, roads, parking areas, and utilities) and new features (e.g., wooden poles or steel lattice structures) within the project vicinity are generally depicted on Figures 2-1 through 2-49.

<u>Erosion/Sediment Control Locations:</u> The locations for erosion and sediment control practices will be dependent on the nature and extent of the construction activities and where soildisturbing activities occur. The minimum locations of these features are depicted in Figures 2-1 through 2-49. The construction activities will be carefully monitored during execution and placement of controls at additional locations may be necessary as the project evolves. The practices that will be employed are discussed in Section 6.0.

<u>Sediment and Storm Water Management Basins:</u> Basins are not anticipated to be required for this project because:

• This is a linear and phased construction project that primarily consists of the installation of temporary access roads, construction laydown areas, and construction entrances.

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Areas of disturbance are isolated and will result in less than 1-acre in total area being disturbed at one time (within a common drainage area).

• The pre-construction and post-construction runoff conditions are not anticipated to change, as described in Item 5d.

<u>Permanent Storm Water Management Practices:</u> The areas disturbed including temporary access drives as part of the project will be returned to pre-construction conditions and no post-construction storm water management controls are anticipated to be required. This is a linear construction project that will not result in the installation of additional impervious surfaces.

<u>Other Wastes:</u> During the construction activities, all solid wastes will be collected and stored in closed-top dumpsters (as needed) or other similar containers and disposed of off-site at an appropriately licensed facility. The generation or storage of toxic wastes is not anticipated as part of this project. The contractor may install temporary sanitary facilities (portable toilets) as needed. Any sanitary wastes will be managed appropriately by the supplier providing and servicing the portable sanitary facilities. During construction, there may be locations for vehicle and equipment fueling and it is anticipated that these activities will be performed at designated areas that are sufficiently buffered from wetlands and streams (minimum 50 feet). Any temporary tanks will be double-walled or otherwise provided with secondary containment, and the fueling activities will be manned at all times so that spills can be quickly responded to.

Given the linear nature of this project, it is impractical to depict the locations of these features on the project maps. More discussion related to these items is provided in Section 6.0.

<u>Construction Entrances:</u> Construction entrances will be installed for construction activities, as necessary and appropriate (e.g. if sediment from vehicles is being tracked into the public roads a construction entrance should be installed). All sediment spilled, washed or tracked onto public roadways shall be removed immediately.

<u>Stream Crossings</u>: Existing public infrastructure will be utilized wherever possible for stream crossings in the project vicinity. Based on a formal surface water delineation (in ROW) and a desktop study of NHD data, designated access locations have been chosen to avoid stream

crossings wherever possible. Based on the desktop review, physical stream crossing construction for access is not believed to be necessary for this project. If stream crossings are not avoidable through the selection of access routes and use of public infrastructure, streams will be bridged by use of temporary construction matting. If necessary, the feasibility of bridging by this method will be verified during construction activities. Unless contradicted by a change in project scope or field conditions, it is assumed that minimal stream crossings will require the use of a temporary crossings that impact stream flow. In the event that a temporary fill is required to support a stream crossing, the necessary permitting will be obtained prior to installation. A temporary crossing detail for wetland and stream areas is provided in Appendix B.

### 5.0 SEDIMENTATION AND EROSION CONTROL MEASURES [Part III.G2]

This SWP3 must contain a description of the controls appropriate for the construction operations covered by this permit and the operator must implement such controls. The contractors and subcontractors responsible for implementation of the controls will be defined following preparation of this SWP3, following bidding and contract award. ATSI will define the responsibilities of these contractors and provide the SWP3 to them for review, acceptance, and implementation.

This SWP3 has been prepared to provide a description of the anticipated minimum sedimentation and erosion control measures based on the current understanding of the construction activities. However, as the construction conditions change it is the operator's or the contractor's responsibility to update this SWP3 in accordance with Section 4.0 to include other required sedimentation and erosion control standards. The erosion, sediment, and storm water management practices used should meet the standards and specifications provided in the current edition of the Ohio Department of Natural Resources (ODNR) Rainwater and Land Development Manual. Excerpts from the 2006 edition depicting the currently proposed erosion and sedimentation control measures are provided in Appendix B for reference.

a) Non-Structural Preservation Methods [Part III.G2a]: An objective of the SWP3 is to preserve the natural, existing conditions within the project area to the extent practical. In general, the construction of the project will require minimal disturbance to develop access

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routes for equipment and is anticipated to only consist of the clearing of vegetation, unless weather conditions require the placement of aggregate. In addition, the use of existing access routes to the extent practical reduces the overall project disturbance. The primary disturbance associated will be at the pole replacement locations. Permanent disturbance of stream and wetland areas is not anticipated to be required, as discussed in Item 5g, 5i and Item 5n.

*b) Erosion and Sediment Control Practices [Part III.G2b, Part III. G2d]:* This SWP3 must specify erosion controls that are capable of providing cover to disturbed soils. These erosion control practices must be implemented in accordance with the schedule provided in the NPDES General Permit (see page 9 of Appendix C).

In summary, the installation of erosion control practices must include the following:

- Installation of temporary stabilization measures in accordance with the General Permit Rules Part II.B, Table 2, as follows:
  - Within 2-days of any disturbance within 50-feet of a surface water of the state, if construction activities will be idle for more than 14-days,
  - Within 7 days of any disturbance that will be idle for more than 14 days but less than one year, and not within 50 feet of a surface water of the state, and/or
  - Prior to the onset of winter weather for any disturbance that will be idle over winter.
- Installation of permanent stabilization measures in accordance with the General Permit Rules Part II.B, Table 1, as follows:
  - Within 7-days of any disturbance that will remain idle/lie dormant for 1-year or more,
  - Within 2-days of reaching final grade for activities within 50-feet of surface water of the state, and/or
  - Within 7-days of reaching final grade for any disturbed areas.

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Temporary and permanent stabilization measures are generally anticipated to consist of the reestablishment of vegetation. Based on the site conditions, the use of rolled erosion control blankets may be necessary in addition to mulching and seeding activities for the restoration of vegetative cover. The re-establishment of vegetative cover shall also occur in tree clearing areas, if applicable.

Silt fence and/or filter sock will be used for structural sediment control in this project. The intent of the silt fence and/or filter sock sediment control practices is to store runoff and allow sediments to settle and be collected in the proposed devices in order to prevent them from reaching surface waters. These structural practices should be implemented before any land- disturbing activities if the duration of disturbance will exceed 14-days. At a minimum, the silt fence will be installed at the locations shown on Figure 2-1 through 2-49. The sediment control practices shall be inspected maintained, and modified to maintain functionality. Additional information regarding the use of silt fence can be found in the General Permit (see pages 18 through 19 of Appendix C) and in Appendix B.

The use of silt fence and/or filter socks as part of the project will be utilized in areas adjacent to the proposed substation pad, wetlands, streams, floodplains, work pads and other areas with earth disturbing activities. Maximum slope length and capacity of silt fencing is restricted as follows:

	Maximum Slope Length Above Silt Fence		
S	lope	Slope Length (ft.)	
0% - 2%	Flatter than 50:1	250	
2% - 10%	50:1 - 10:1	125	
10% - 20%	10:1 - 5:1	100	
20% - 33%	5:1 - 3:1	75	
33% - 50%	3:1 - 2:1	50	
> 50%	> 2:1	25	

Note: For larger drainage areas, see standards for temporary diversions, sediment traps and sediment basins.

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Maximum drainage area (in acres) to 100 linear feet of sediment barrier	Range of slope for a particular drainage area (in percent)
0.5	< 2%
0.25	> 2% but < 20%
0.125	≥ 20% but < 50%

For this project, it is anticipated that contributing drainage areas and slopes will not be significant given the small size of this project and the flat landscape. Additionally it is not anticipated that the total area of disturbance will approach or exceed 1-acre at any given time in any common drainage location, therefore the use of storm water diversion practices (swales, dikes, berms, etc.) should not be necessary.

Straw bales will not be used as part of this project.

Inlet protection is not anticipated to be necessary for this project. In the event that inlet protection is necessary, geotextile – stone inlet protection or equivalent, will be used to prevent sediment from entering storm sewer systems/reaching surface waters of the state.

Dewatering activities are not anticipated as part of this project. In the event that dewatering is necessary, filter socks or small settling basins will be used to prevent the migration of sediments from these activities.

Construction entrances will be installed, as necessary, at access routes that intersect public roads. The construction entrances will be maintained throughout construction, and removed following use. The public roads adjacent to disturbed areas will also be cleaned on a daily basis or as necessary to keep public roads free of sediment.

*c)* **Runoff Control Practices [Part III.G2c]:** Runoff control practices generally consist of measures designed to control the flow of runoff from disturbed areas and prevent erosion. These measures generally consist of temporary rock check dams, velocity dissipation practices, diversions to direct flow from disturbed areas, and protective grading practices. Given the relatively flat nature of the limits of the project and the isolated areas that are anticipated to be disturbed, these runoff control practices are not anticipated to be required for this project.

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*d)* Sediment Control Practices [Part III.G2d]: The structural sediment control practices that are anticipated to be implemented for this project include the installation of silt fence and/or filter sock. The intent of these sediment control practices is to store runoff and allow sediments to settle and be collected in the proposed devices in order to prevent them from reaching surface waters of state. These structural practices should be implemented before any land-disturbing activities. At a minimum, these controls will be installed at the locations shown on Figures 2-1 to 2-49 and adjacent to tree clearing areas, before any land-disturbing activities. The sediment control practices shall be inspected, maintained, and modified to maintain functionality.

Sediment settling ponds are required when there is concentrated runoff (e.g., storm sewer or ditch), or when the design capacity of silt fence or inlet protection has been exceeded. Due to the linear and phased nature of the construction activities, it is not anticipated that the total runoff from disturbed area will exceed the design capacity of the BMPs at any given time.

Inlet protection is not anticipated to be necessary for this project. In the event that inlet protection is necessary, geotextile – stone inlet protection or equivalent, will be used to prevent sediment from entering storm sewer systems/reaching surface waters of the state.

Dewatering activities are not anticipated as part of this project. In the event that dewatering is necessary, filter socks or small settling basins will be used to prevent the migration of sediments from these activities.

Where construction activity disturb areas adjacent to surface waters of the state, the structural practices will be designed and implemented on site to protect all adjacent surface waters of the state from impacts of sediment runoff. No structural sediment control (e.g., the installation of silt fence etc.) will be installed in the surface waters of the state but will be installed immediately adjacent to surface waters of the state and will comply with the buffer non-numeric effluent limitation in Part II.A.6 as measured from the ordinary high water mark of the surface water.

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e) **Post-Construction Storm Water Management Requirements [Part III.G2e]:** This is a linear project which will not result in the installation of additional impervious surface; therefore this project is exempt from this requirement.

*f) Surface Water Protection [Part III.G2f]:* Based on field delineation of surface waters, NWI, and NHD data, the overall limits of the construction corridor include approximately 33.5 acres of wetlands and 6,628 feet of streams.

As described throughout this SWP3, the project has been designed to eliminate permanent disturbance and minimize temporary disturbance to these sensitive areas. BMPs will be utilized when working in the vicinity of streams or wetlands. This includes, but is not limited to, the installation of silt fencing (or similarly effective measures) prior to initiating construction near streams and wetlands. It also may include the installation of orange construction fence around streams and wetlands adjacent to, but outside of the construction corridor or the limits of disturbance, which will be used to delineate and protect stream and wetland areas that are not to be disturbed. The movement of equipment working within wetlands will be limited to the minimum necessary to accomplish the work. All heavy equipment that is required to traverse wetland areas will be supported on either construction matting or steel plates to minimize ground disturbance. A temporary crossing detail for wetland and stream areas is provided in

Appendix B. Low ground pressure equipment may also be used without matting, provided ground disturbance can be sufficiently minimized (e.g. ground is frozen or dry).

# g) Other Controls [Part III.G2g]:

### 1) Non-Sediment Pollutant Controls

This SWP3 must also give consideration to pollutant sources other than sediments. These may include liquid or solid wastes (including concrete washout), off-site tracking of sediments by vehicles, sanitary or septic wastes, vehicle fueling and maintenance activities, and other similar non-sediment pollutant sources. This SWP3 also give consideration to prevent and respond to chemical spills and leaks. Incidents involving a reportable quantity release of potentially hazardous materials

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are expected to be limited to the accidental release of small quantities of petroleum products from construction vehicles, including but not limited to motor oil, transmission fluids, and hydraulic oils. To prevent any spill runoff, re-fuel construction vehicles in designated areas away from waters of the state. Spill cleanup kits and personnel trained in their use will be generally accessible in the event of a spill. Any contaminated soil must be removed and properly disposed of.

For large spills (25 or more gallons) of petroleum products, in addition to contacting the FirstEnergy Environmental Emergency Hotline (at 1-888-544-4877), the Ohio Environmental Protection Agency (Ohio EPA) (at 1-800-282-9378), the local fire department, and the local emergency planning committee (LEPC) must also be contacted immediately following the spill.

No vehicle maintenance activities that could result in storm water contamination (e.g., oil changes, engine repairs) will be permitted in construction area, it should be done outside on topographically flat area and not without appropriate spill control measures in place before maintenance activities occur. All maintenance and fueling areas will be located away from watercourses, drainage ditches, field drains, or other streams.

2) Off-site Vehicle Tracking: Trucks hauling materials and equipment to and from the project site will use the access routes identified in Figures 2-1 through 2-49. Where necessary for control of sediment, construction entrances will be established where construction traffic enters and exits public roadways. All sediment spilled, washed, or tracked onto public roadways shall be removed immediately. Equipment cleaning (if necessary) will be limited to water washing as required to prevent the removal of excessive dirt and mud from the project site. Washings will be collected in a catchment area to prevent sediment migration.

- 3) Compliance with Other Requirements: ATSI and their contractors shall comply with applicable state and/or local waste disposal, sanitary sewer, or septic system regulations, including prohibiting waste disposal by open burning.
- 4) Trench and Ground Water Control: Dewatering activities are not anticipated as part of the construction activities but appropriate measures shall be utilized if dewatering is required.
- 5) *Contaminated Sediment:* The project area is not located within a formerly developed area and contaminated sediments/soils are not anticipated to be encountered during construction. This section is not applicable to the proposed construction activities.

# 6.0 MAINTENANCE, INSPECTIONS, AND RECORDS [Part III.Gh, Part III.Gi]

To maintain the storm water management system in effective operating condition, erosion and sedimentation control structures will receive routine observation from construction personnel. In addition, each installed erosion and sedimentation control structure, and areas contributing to storm water discharges at the locations of these structures, will also be regularly inspected by qualified personnel at least weekly and again after each rainfall/precipitation event exceeding 0.5-inch in 24-hours. Areas that have been temporarily stabilized will be inspected at least once a month during construction. The results of such inspections will be noted on the written Inspection and Maintenance Report Forms included in Appendix A and must be signed by the inspector. The regular inspections will include:

- Disturbed areas of the construction site that are exposed to precipitation;
- Receiving surface drainage ways for evidence of siltation effects resulting from construction;
- Structural control measure integrity and efficacy to prevent impacts to receiving water resources or wetlands; and

• Locations where vehicles enter or exit the project site as potential locations of off-site sediment tracking.

Any damage or deficiency noted during routine or regular inspections will be written down on an Inspection and Maintenance Report Form (Appendix A) and corrected by the construction crew as directed by ATSI or their contractors. The written inspection records will be kept and maintained by ATSI, and will include notes on any corrective actions taken. These records will be made available for inspection by any regulating agency. The records will also be maintained for a period of 3-years following construction.

Any deficiencies will be corrected immediately following observation, by repair of damaged or deteriorated controls, or by modifying structural or operational practices to achieve the desired results. If needed, the erosion and sedimentation control plan shall be revised within 10 days following such modifications.

Maintenance of stabilization and structural erosion control measures will include the following:

- Seeded areas shall be checked regularly for bare spots, washouts, and healthy growth to assure that a good stand of grass is being maintained. Areas that fail to establish vegetation cover will be re-seeded as soon as such areas are identified.
- Silt fencing will be inspected for depth of sediment and tears, to see if the fabric is securely
  attached to the fence posts, and to see that fence posts are firmly in the ground. Built-up
  sediment will be removed from silt fencing before it has reached one- third the height of
  the fence. Removed sediments will be stabilized/spread on-site.
- Construction entrances will be observed and maintained by the replacement or addition of aggregate materials (if applicable).
- ATSI or their contractors will be responsible for inspections, maintenance, erosion control measure repair, and filling out of the Inspection and Maintenance Report Forms.

It is also the responsibility of ATSI and their contractors to confirm that the personnel selected for inspection and maintenance responsibilities are qualified to assess the conditions of the erosion and sediment controls and identify the maintenance activities necessary to keep the erosion and sedimentation controls used on-site in good working order.

All maintenance and inspection records must be maintained for a period of at least 3-years following submission of the Notice of Termination (NOT) for the project.

# 7.0 COMPLIANCE WITH NON-NUMERIC EFFLUENT LIMITATIONS [Part II]

The General Permit Part II specifies non-numeric effluent limitations that are to be achieved through the design of appropriate controls and the implementation of this SWP3. This section provides a summary of the non-numeric effluent limitations and the section(s) of this SWP3 where the criteria for achieving the effluent limitations are described and/or identifies the construction activity-specific reason that the effluent limitations are not applicable to this project.

# • Item A – Erosion and Sediment Controls:

- 1. Control storm water volume and velocity to minimize soil erosion Section 6.0, Item b.
- 2. Control storm water discharges to minimize erosion at outlets and to minimize downstream channel and streambank erosion A single point source/outlet is not anticipated for this project.
- 3. Minimize the amount of exposed soil during construction activity Section 6.0, Item a.
- 4. Minimize the disturbance of steep slopes Section 6.0, Item b.
- 5. Minimize sediment discharges from the site Section 6.0, Item d.
- 6. If feasible, maintain a 50-foot undisturbed natural buffer around surface waters of the state Section 6.0, Item f.
- 7. Minimize soil compaction and, unless infeasible, preserve topsoil Mechanical soil compaction is only anticipated to occur within limited areas of the transmission structure

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foundations, and is necessary for structural stability. Limited topsoil clearing may occur in the vicinity of laydown areas or as necessary to facilitate construction access. In areas where topsoil is cleared, the subgrade will be stabilized with the use of DGA/gravel materials.

- Item B Soil Stabilization: Section 6.0, Item b.
- Item C Dewatering: Section 6.0, Item b and g (4).
- Item D Pollution Prevention Measures:
  - 1. Minimize the discharge of pollutants from wash waters Section 6.0, Item g (2).
  - Minimize the exposure of building materials and wastes The transmission line poles, conductors and other "building" materials will be stored off site. These materials are not anticipated to result in the release of pollutants to storm water. The management of waste materials is described in Section 6.0, Item g (1).
  - 3. Minimize the discharge of pollutants from spills and leaks Section 6.0, Item g (1).
- Item E Prohibited Discharges: Section 6.0, Item g (1).
- Item F Surface Outlets: Section 6.0, Items b and d.

### 8.0 COMPLIANCE WITH ENVIRONMENTAL REGULATIONS [Parts III.G3 & V.M]

All discharges regulated under the General Permit must comply with the lawful requirements of municipalities, counties, and other local agencies regarding discharges of storm water from construction activities. Furthermore, no condition of the General Permit shall release the permittee from any responsibility or requirements under other environmental statutes or regulations. At a minimum, this includes the following environmental programs:

#### a) Ohio EPA General Permit

A Notice of Intent (NOI) to be submitted by FirstEnergy to the Ohio EPA for coverage under NPDES Permit No. OHC000005 (General Storm Water Permit for Construction Activities). A

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copy of the General Permit is provided in Appendix C. The NOI and Co-Permittee approval letters from Ohio EPA shall be inserted into Appendix E.

### b) Sections 401 and 404 of the Clean Water Act

It is anticipated that there will be no impacts to wetlands or other "Waters of the United States" and a 401/404 filing will not be required.

### c) Ohio EPA Isolated Wetland Permit

It is anticipated that an Ohio EPA Isolated Wetland Permit will not be required.

### d) Ohio Dam Safety Law

The Ohio Dam Safety Law does not apply since there are no dams within the project footprint.

# FIGURE 1

# PROJECT OVERVIEW MAP

**Storm water Pollution Prevention Plan** 

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FIGURE 2

**EROSION AND SEDIMENT CONTROL PLANS** 

**Storm water Pollution Prevention Plan** 

Hanna-Newton Falls 138 kV









Issued: February 25, 2020









Source: BMCD, ESRI, NWI, NPMS



3174.00. WILLIAM **HMEADORS**J NN MEAI

63169.00, JASON CSPEICHERJ/S **KERIASPEICHER** 

0003

63168.00, AMY JYURICEK

Utility (Observed in Field) Utility (Based on NPMS Data)

Culvert (Inlet/Outlet) ----- Culvert

Impacted Parce Municipality Township

County USACE District

FirstEnergy Ohio Edison Hanna-Newton Falls 138kV Preliminary SWPPP Mapbook

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Case No(s). 19-1857-EL-BLN

Summary: Notice of Docketing of Stormwater Pollution Prevention Plan per Recommended Condition in Staff Report of Investigation (Part 1 of 2) electronically filed by Mr. Robert J Schmidt on behalf of American Transmission Systems Inc.