Applicant Exhibit 39

BEFORE
THE OHIO POWER SITING BOARD

In the Matter of the Application of Firelands Wind, LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Wind-Powered Electric Generation Facility in Huron and Erie Counties, Ohio.	)))))	Case No: 18-1607-EL-BGN

DIRECT TESTIMONY OF

Rob Corzatt
Senior Project Manager
Hull & Associates, LLC

on behalf of
Firelands Wind, LLC

September 11, 2020

/s/ Christine M.T. Pirik
Christine M.T. Pirik (0029759)
(Counsel of Record)
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1. Please state your name, current title, and business address.

My name is Rob Corzatt. I am a Senior Project Manager for Hull & Associates, LLC, located at 6397 Emerald Parkway, Suite 200, Dublin, Ohio 43016.

2. Please summarize your educational background and professional experience.

I received a Bachelor of Arts Degree from The Ohio State University, College of Arts & Sciences at the end of Spring Quarter 1988. My major was in Geology. I have been employed in the environmental consulting industry since 1988. I joined Hull & Associates in April 2002. I am currently a Senior Project Manager and manage projects for our Environmental Services Division. In my 30 plus years as an environmental consultant, I have conducted, and then supervised, multiple hydrogeological investigations in a variety of hydrogeological settings throughout the State of Ohio. My experience includes investigations for the siting of solid waste landfills, alternative energy projects and redevelopment of former industrial properties through the Ohio Voluntary Action Program. My resume is attached as Attachment RC-1.

3. On whose behalf are you offering testimony?

I am testifying on behalf of the Applicant in the case, Firelands Wind, LLC ("Applicant" or "Firelands"), which is seeking to develop the proposed Emerson Creek Wind Farms ("Project").

4. What is the purpose of your testimony?

The purpose of my testimony is to describe the certain information presented in the Groundwater, Hydrogeological, and Geotechnical Report ("Report"), which is Exhibit E to the Application for Certificate of Environmental Compatibility and Public Need filed on January 31, 2019 ("Application"). I am prepared to testify regarding groundwater and hydrogeological conditions as they may pertain to the Project. My testimony, together with the other witnesses for Firelands testifying in this case, supports the Ohio Power Siting Board's ("Board's") adoption of the Joint Stipulation and Recommendation ("Stipulation"), which was filed in this docket on September 11, 2020, and is being offered in this proceeding as Joint Exhibit 1.

5. Please describe the history of your involvement with the Project.

Hull was contacted by Apex Clean Energy, Inc. in February 2018 to provide a proposal to perform a desktop study of the hydrogeology and geotechnical/geological conditions of the proposed Emerson Creek Wind Project. Hull's proposal was submitted by Mr. Cory Schoonover, Project Manager and Mr. Shawn McGee, Hull's former Geotechnical Practice Leader. I was asked by the management team for the Project to provide senior overview of the hydrogeologic portion of the desktop report. I did not personally conduct the research described in the report or perform the site reconnaissance referenced in the Report. However, I provided guidance on the selection of resources available for review and supervised completion of the hydrogeological portion of our desktop study. I provided a technical and editorial review of the hydrogeological portions of the Report while Mr. McGee directed the field reconnaissance and provided review of the geotechnical portions of the report.

6. Please describe the requirements set forth in the Board's rule and the documentation provided by Firelands Wind in response to the requirements.

In accordance with Ohio Administrative Code ("O.A.C.") Rule 4906-04-08, Firelands Wind submitted the following information:

- An evaluation of the impact to public and private water supplies due to construction and operation of the proposed facility.
- An evaluation of the impact to public and private water supplies due to pollution control equipment failures.
- Existing maps of aquifers, water wells, and drinking water source protection areas that may be directly affected by the proposed facility.
- How construction and operation of the facility will comply with any drinking water source protection plans near the Project area.
- An analysis of the prospects of floods for the area, including the probability of occurrences and likely consequences of various flood stages, and plans to mitigate any likely adverse consequences.
- A description of the suitability of the site geology and plans to remedy any inadequacies.

- A description of the suitability of soil for grading, compaction, and drainage, and plans to remedy any inadequacies and restore the soils during post-construction reclamation.
- A description of plans for the test borings, including closure plans for such borings and a timeline for providing the test boring logs and the following information to the Board: (i) subsurface soil properties; (ii) static water level; (iii) rock quality description; (iv) percent recovery; and (v) depth and description of bedrock contact.

The Report addresses each of these requirements set forth within the Board's rules.

7. What is the role of you and your firm in regards to the Report set forth in Exhibit E to the Application?

Hull was contracted to complete a desktop review regarding the hydrogeological and geotechnical/geological characteristics of the Project area for the proposed Emerson Creek Wind Farm. Our research included reviewing publicly available information from various state and federal agencies that were referenced in our report. In addition, Hull performed a "drive by" reconnaissance of the Project area. My role was to provide senior review of the hydrogeologic summary included in the desktop report and to determine if there were any potential issues for development of the turbine sites relative to the local hydrogeology based on the information obtained during the desktop analysis.

8. What work have you performed on this Project?

As noted in my response to Question 5, I supervised the project team throughout their review of the various hydrogeological resources and report preparation. I provided editorial and technical review of the hydrogeological portions of the desktop survey and assisted in the determination if there were potential development issues related to the hydrogeology of the Project area. Our Geotechnical Practice Leader at the time, Mr. McGee, directed the field reconnaissance and provided technical review related to the geotechnical and geological portions of the report.

9. Please generally summarize the findings of the Report set forth in Exhibit E to the Application as it relates to the purpose of your testimony.

The summary presented in the desktop Report was based on hydrogeologic and geologic references for the Project area and a field reconnaissance of the potential sites from publicly available rights-of-way. Based on our previous experience with other wind turbine projects, it was assumed that the turbine foundations would be relatively shallow in depth below the existing ground surface and approximately 60 to 70 feet in diameter. The property owner well surveys included in the Report indicated that at some locations private water wells and corresponding groundwater levels were less than 20 feet deep. The surveys also indicated that the wells were typically located close to the homes, barns, or other outbuildings on the property. Based on setback requirements of the wind turbines from habitable structures and neighboring properties, the construction of the proposed turbines is not likely to have a negative impact on the local geology and/or hydrogeology of the Project boundary. The local geology and/or hydrogeology will not be prohibitive regarding construction of the proposed wind turbines, access roads, and/or substations.

Based on published reports from the Ohio Department of Natural Resources, Division of Geological Survey, known and suspected karst geology is located in the extreme western portion of the Project area near Bellevue. The limestone bedrock beneath the surface in this area is prone to karst development. However, the majority of the proposed wind turbines are located to the east and south of Bellevue where the underlying bedrock is shale. The shale is not prone to karst development and is also not typically conducive to well development due to poor yields. Boring logs included in the geotechnical investigation report completed by RRC indicated that only a couple borings advanced through limestone bedrock exhibited potential voids within the limestone. These voids appeared to be limited to less than 2 feet in vertical extent. Therefore, construction of the proposed wind turbines and support structures should have minimal impact on the quality, availability, and/or movement of groundwater in the Project area.

Information provided by the Ohio Environmental Protection Agency ("Ohio EPA") indicates there are several Source Water Protection Areas ("SWPAs") located within the

Project area. At the time the desktop survey was completed, approximately 49 of the proposed turbines were located within one of the designated SWPAs. Although there are specific agricultural, commercial, and industrial activities that are prohibited within SWPAs, Hull's review of the regulatory programs indicated that construction of the wind turbines would not be a restricted activity within the limits of a surface water or groundwater SWPA. Best management practices during construction and operation of the wind turbines and support structures should result in minimal impact to the SPWAs.

In summary, we concluded that the primary constructability issues potentially associated with the Project were based on the geology (potential karst geology and shallow bedrock depths) and poor surface drainage in the area. We recommended that a geotechnical investigation be completed prior to finalizing the foundation system design and Applicant followed that recommendation.

10. What degree of confidence do you have in the Report set forth in Exhibit E of the Application?

I have a high degree of scientific certainty in the conclusions and recommendations presented in the Report. This conclusion stems from:

1) The availability of publicly available hydrogeologic and geologic references for the Project area;
2) The capabilities and experience of Hull's project team; and
3) Our understanding of the design and construction of the wind turbines.

11. Please explain what, if any, additional testing needs to be performed prior to construction.

Based on our review of publicly available hydrogeologic information and drive by reconnaissance of the Project area, no additional testing is necessary.

12. Do the Board's rules require that a final geotechnical report be prepared before construction begins?

Yes. O.A.C. Rule 4906-4-09(A)(2)(b)(i) requires that Firelands submit a fully detailed geotechnical exploration and evaluation 60 days before the preconstruction conference. This final report will address whether proposed turbine locations are located above karst formations and whether potential mitigation measures are recommended. It is our understanding this report has been prepared by others.

13. Are your opinions and conclusions in your testimony made with a reasonable degree of scientific certainty?

Yes.

14. Does this conclude your testimony?

Yes. However, I reserve the right to update this testimony to respond to any further testimony, reports, and/or evidence submitted in this case.

CERTIFICATE OF SERVICE

The Ohio Power Siting Board's e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to these cases. In addition, the undersigned certifies that a copy of the foregoing document is also being served upon the persons below this 11th day of September, 2020.

/s/ Christine M.T. Pirik
Christine M.T. Pirik (0029759)

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Attachment RC-1

Resume

DICKINSON WRIGHT PLLC

■ ROBIN (ROB) CORZATT | Senior Project Manager

HULL
Environment / Energy / Infrastructure

EDUCATION:
- Bachelor of Arts, Geology, The Ohio State University, 1988

TRAINING:
- OSHA 40-Hour Hazardous Waste Site Activities (1989) and Annual 8-Hour Refresher Courses
- OSHA 8-Hour Supervisor Training (1991)
- ODOT Categorical Exclusion Training Class (2000)

Years with Hull: 18
Other: 14

Rob Corzatt is a Project Manager and Geologist with 30+ years of experience in environmental consulting. He has additional valuable experience in planning hydrogeological investigations for assorted hydrogeologic environments. Rob has worked at both solid and hazardous waste landfill sites, brownfield sites, operating industrial and commercial properties, and petroleum UST sites.

Rob's expertise includes:

Environmental Assessment

- Directs completion of Phase I Environmental Site Assessment and Phase I Property Assessments compliant with ASTM and Ohio Voluntary Action Program (VAP) standards.
- Prepares and directs completion of Phase II assessments including the installation of soil borings and monitoring points for the collection of environmental samples of soil, groundwater and soil gas.
- Serves as lead author and/or peer reviewer of Phase I and Phase II assessments, Property-specific Risk Assessments and Remedial Action Plans.
- Directs Closure and Tier I/II investigations for closure of underground storage tanks pursuant to the Bureau of Underground Storage Tank Regulations (BUSTR).
- Prepared National Environmental Protection Act (NEPA)documentation and Categorical Exclusion Levels 1 and 2 for transportation projects.
- Conducted comprehensive hydrogeologic assessments and preparation of Construction Permit Applications for landfills in Ohio and Michigan.

Brownfield Redevelopment and Site Remediation

- Implemented oversight and confirmatory sampling of remedial excavations on former contaminated industrial sites.
- Directed preparation of Ohio VAP No Further Action (NFA) Letters for multiple former brownfield sites across Ohio.
- Conducted oversight activities at National Priorities List (NPL) and other sites and conducted technical reviews.
- Directed an investigation to classify and reveal the horizontal and vertical extent of pesticide-contaminated soils along the right-of-way of a major roadway; has conducted multiple assessments for ODOT.

Selected project experience:

Brownfield Redevelopment

- Springfield Regional Cancer Center | VAP MOA Project | Springfield, Ohio. First MOA project in State to receive Covenant Not to Sue (CNS) from Ohio EPA.
- Former International Truck & Engine Corporation, Lagonda Body Plant | CORF/VAP-MOA Project | Springfield, Ohio
- Former Greenawalt-Trenor Complex | CORF/VAP-MOA Project and CNS | Springfield, Ohio
- Buck Creek Redevelopment Project | COAF/VAP Project and CNS | Springfield, Ohio
- Former Greenawalt-Trenor Complex | CORF/VAP-MOA Project and CNS | Springfield, Ohio
- Former Haucke Property | CORF/VAP Project and CNS | Springfield, Ohio

- Former SPECO Kelsey Hayes Property | CORF/VAP-MOA Project and CNS | Springfield, Ohio
- Former D&H Manufacturing Facility | TSCA PCB Closure, CORF/VAP-MOA Project and CNS | Springfield, Ohio
- Monument Avenue Gateway Project | CORF/VAP-MOA Project and CNS | Dayton, Ohio
- Dayton Aviation Heritage Development Project | TSCA PCB Closure, CORF/VAP-MOA Project and CNS | Springfield, Ohio
- Former Electronics Manufacturer | VAP Project and CNS | Ottawa, Ohio
- Former Frick-Gallagher Manufacturing Facility | VAP Project and CNS | Lancaster, Ohio
- Former Ford Transmission Plant | VAP Project and CNS| Batavia, Ohio
- Former General Motors Powertrain Assembly Plant | VAP Project and CNS| Parma, Ohio
- Former Johnson Manufacturing and Q3 Properties | Ongoing VAP Project | Urbana, Ohio
- Confidential Manufacturing Client | Ongoing VAP Project and Remedial Design| Columbus, Ohio

Environmental Assessment

- Leaking Salt Storage Facility Investigations | Springfield and Franklin, Ohio
- Automotive Parts Manufacturer | Environmental Support for Redevelopment of VAP/MOA Property | Springfield, Ohio
- Former Ohio Metals Alloy Property | VAP Compliant Phase II Property Assessment and Redevelopment Support | Clarington, Ohio
- Multiple Solar and Wind Farm Clients | Lead Peer Reviewer for Desktop Hydrogeological Surveys and Environmental Assessments | Various Locations in Western and Southern, Ohio
- Former Union Terminal | BUSTR Closure Reporting and NFA for multiple USTs | Cincinnati, Ohio
- Former Printing Company | BUSTR Closure reporting and NFA | Springfield, Ohio
- Commercial Trucking Company in Northeast Ohio and Pennsylvania | Ongoing VAP Project | Parma, Ohio
- Confidential Industrial Client | Ongoing VAP and Urban Setting Designation (USD) Project | Columbus, Ohio
- Ohio Department of Transportation | Phase I and II Environmental Site Assessments for Road Improvement Project | Harrisburg Pike, Columbus, Ohio
- Ohio Department of Transportation | Phase I and II Environmental Site Assessments for Road Improvement Project | Weber Road, Columbus, Ohio
- Ohio Department of Transportation | Phase I and II Environmental Site Assessments for Road Improvement Project | US 40 and 42, London, Ohio
- Former Ludwig Farms Property | Phase I Environmental Site Assessment | Woodsfield, Ohio
- Former Quarto 4 Mining Property | Phase I Environmental Site Assessment | Powhatan, Ohio
- Former Cochransville Property | Phase I Environmental Site Assessment | Monroe County, Ohio
- Former Coal Spoil Pile | Phase I Environmental Site Assessment | Dilles Bottom, Ohio

- Former Trucking Company Property | Phase I Environmental Site Assessment | Shadyside, Ohio
- Ohio State University Medical Offices | Limited Phase II Environmental Site Assessment | Upper Arlington, Ohio
- Springfield Air Park | Phase I Environmental Site Assessment | Springfield, Ohio
- Buck Creek Bike Trail Realignment | Limited Phase II Environmental Site Assessment | Springfield, Ohio
- Former Genie Company Site | Phase I and II Environmental Site Assessments, Remedial Excavations | Alliance, Ohio
- Automotive Manufacturer, Former Employee Parking Area| Phase I and II Environmental Site Assessments | Cleveland, Ohio
- Former Sawmill and Kiln | Phase I Environmental Site Assessment | Moundsville, West Virginia
- Multiple Former Residential and Commercial Properties | Phase I and II Environmental Site Assessments | Former Columbus Urban Growth Corporation, Columbus, Ohio

Summary: Testimony - Direct Testimony of Rob Corzatt electronically filed by Christine M.T. Pirik on behalf of Firelands Wind, LLC