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September 15, 2014

Via Electronic Filing

Ms. Barcy McNeal
Public Utilities Commission of Ohio
Administration/Docketing
180 East Broad Street, 11th Floor
Columbus, OH 43215-3793

Re: Letter of Notification of Compliance for the Oregon Clean Energy Center, LLC, Case No. 12-2959-EL-BGN

Dear Ms. McNeal:

The May 1, 2013 Opinion, Order, and Certificate approving Oregon Clean Energy, LLC's ("Oregon") Certificate of Environmental Compatibility and Public Need to Construct an Electric Generation Facility and the March 15, 2013 Second Supplement to Application established a set of conditions and supplemental commitments pertaining required to be completed 30 days prior to the preconstruction meeting.

Specifically, Oregon is required to comply with Supplemental Commitment #2, #3, and #12, stated below:

(#2) Prior to the preconstruction conference, the Applicant will have in place a complaint resolution procedure to address potential public grievances resulting from project construction and operation. The complaint resolution procedure must provide that the Applicant will work to resolve or mitigate any issues with those who submit a complaint and that the Applicant will provide monthly updates on the status of all complaints to Staff. After first three months of initial operation, updates on the status of complaints may be provided on a semi-annual basis. The complaint resolution process must include procedures for handling construction and operational noise complaints, as well as mitigation plans for any noise complaints for which validly measured operational noise levels exceed 60 dBA at existing residences. The Applicant shall provide the complaint resolution procedure to Staff for review and confirmation that it complies with this requirement, at least 30 days prior to the preconstruction conference.

...

(#3) At least 30 days before the preconstruction conference, the Applicant will submit to Staff, for review and acceptance, one set of

detailed engineering drawings of the final project design, including the facility, temporary and permanent access roads, any crane routes, construction staging areas, and any other associated facilities and access points so that Staff can determine that the final project design is in compliance with the terms of the certificate. The final project layout will be provided in hard copy and as geographically-referenced electronic data. The final design will include all requirements of the certificate and references at the locations where the Applicant and/or its contractors must adhere to a specific requirement in order to comply with the certificate.

...

(#12) At least 30 days before the preconstruction conference, the Applicant will submit to Staff for review and confirmation that it complies with this requirement, a proposed emergency response plan to be used during construction, to be developed in consultation with the fire department(s) and emergency personnel having jurisdiction over the area. The Applicant will coordinate with fire, safety, and emergency personnel during all stages of the project.

This letter is to inform the OPSB Staff that Oregon is in compliance with the above mentioned commitments. Each of the deliverables required at least 30 days before the preconstruction meeting were delivered to Christina Burri, of the Ohio Power Siting Board Staff, via an online data-room within the required timeframe. The Complaint Resolution Process is attached as Exhibit A, the Engineering Drawings are attached as Exhibit B, and the Emergency Response Plan is attached as Exhibit C.

If you have any questions please call at the number listed above.

Sincerely,



Sally W. Bloomfield

cc: Chris Cunningham; Christina Burri

Exhibit
A

COMPLAINT RESOLUTION PROCEDURE

816N. Lallendorf Rd.
Oregon, OH 43616

B&V PROJECT NO. 184704

PREPARED FOR

Oregon Clean Energy Center

8 SEPTEMBER 2014

Proprietary Statement

The information contained in this manual is proprietary and its contents may not be copied, disclosed to other parties, or used for other than the express purpose for which it was provided without the written consent of Black & Veatch.

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1. Introduction

This procedure defines the requirements and process for management of complaints received during the construction, startup, and commissioning of the Oregon Clean Energy Center (OCEC) project. In all cases, Black & Veatch will work to resolve or mitigate any issues with those who submit a complaint. In addition, Black & Veatch will provide monthly updates on the status of all complaints to the Owner and the Ohio Power Siting Board (OPSB).

This procedure only applies to the construction, startup, and commissioning period for which Black & Veatch is in control of the unit. Following substantial completion and commercial operation, the Owner will take control of this process.

Black & Veatch is committed to reducing employee and subcontractor exposure to high noise levels during construction, commissioning, and initial operation and will comply with applicable Occupational Safety and Health Administration (OSHA) standards.

2. Noise Complaint Process

Throughout the construction, startup, and commissioning of the OCEC project, Black & Veatch will document, investigate, evaluate, and attempt to resolve all project-related noise complaints. Black & Veatch will perform the following:

- Use the Noise Complaint Resolution Form (refer to Exhibit 1), or a functionally equivalent procedure acceptable to the OPSB, to document and respond to each noise complaint.
- Attempt to contact the person(s) making the noise complaint within 24 hours, or 72 hours if the complaint is made over the weekend.
- Conduct an investigation to determine the source of noise related to the complaint.
- Take all feasible measures to reduce the noise at its source, if the noise is project related.
- Submit report documenting the complaint and the actions taken. The report will include: a complaint summary, including final results of noise reduction efforts, and if obtainable, a signed statement by the complainant stating that the noise problem is resolved to the complainant's satisfaction.

The reports will be filed and maintained by the Site Manager documenting the resolution of the complaint.

3. Noise Restrictions

Project design and implementation, once completed, will include appropriate noise mitigation measures adequate to ensure that the noise levels at the following boundary limits, due to operation of the project alone, will not exceed the following levels:

- Property boundary: Less than or equal to 75 decibel A-weighting (dBA).
- Nearest residential receptors: Less than or equal to 60 dBA.

The far field A-weighted sound level emissions from the OCEC project will be as stated above, in a free field environment, when measured 5 feet above the ground.

Black & Veatch will design and construct the project with the following noise attenuation factors:

- The combustion and steam turbine generators will be located indoors.
- The gas compressors will be located indoors.
- Plant equipment will be supplied appropriate noise mitigations to achieve the abovementioned noise limits.
- High noise equipment will be furnished with appropriate sound enclosures to meet limits.
- Construction activities that produce significant sound (such as pile driving) will be restricted to daylight hours.

STEAM BLOW PROCESS

During the high-pressure steam blow process, Black & Veatch will equip the steam blow piping with a temporary silencer that quietens the noise of steam blows.

Construction Time Restrictions

Noisy construction work relating to the facility, including pile driving, the use of a hoe ram, and blasting operations, if required, will be restricted to the following times:

- Monday through Friday: 10 a.m. to 5 p.m.

General construction activities will be limited to the following times:

- Monday through Friday: 7 a.m. to 7 p.m. or until dusk when sunset occurs after 7 p.m.
- Weekends and holidays: 7 a.m. to 7 p.m.

Construction activities that do not involve noise increases above ambient levels at sensitive receptors are permitted outside of the hours listed above.

Haul trucks and other engine-powered equipment will be equipped with adequate mufflers. Haul trucks will be operated in accordance with posted speed limits. Truck engine exhaust brake use will be limited to emergencies.

4. Noise Complaint Procedural Steps

NOISE 1 At least 10 days prior to the start of ground disturbance, Black & Veatch will notify all residents within 1 mile of the site and 1/2 mile of the linear facilities, by mail or other effective means, of the commencement of project construction. At the same time, Black & Veatch will establish a telephone number for use by the public to report any undesirable noise conditions associated with the construction and operation of the project and will include that telephone number in the above notice. Since the telephone is not staffed 24 hours a day, an automatic answering feature, with date and time stamp recording capability to answer calls when the phone is unattended, will be established. During construction, this telephone number will be posted at the project site in a manner visible to passersby. OCE will be also be notified of such activities in parallel with the resident notifications.

Verification Prior to ground disturbance, the project Owner shall transmit to the Black & Veatch Site Manager a statement, signed by the project Owner’s Project Manager, stating that the above notification has been performed and describing the method of that notification.

NOISE 2 At least 10 days prior to the first steam blow(s), Black & Veatch will notify all residents within 1 mile of the site of the planned steam blow activity and shall make the notification available to other area residents in an appropriate manner. The notification may be in the form of letters to the area residences, telephone calls, fliers, or other effective means. The notification will include a description of the purpose and nature of the steam blow(s), the proposed schedule, and the explanation that it is a one time operation and not part of normal plant operations. OCE will be also be notified of such activities in parallel with the resident notifications.

Verification Within 5 days of notifying residents, the project Owner shall send a letter to the Site Manager confirming that the residents have been notified of the planned steam blow activities, including a description of the method(s) of that notification.

5. Miscellaneous Complaint Process

Similar to the noise complaint process described in Section 2, Black & Veatch will document, investigate, evaluate, and attempt to resolve any other project-related complaints (e.g., traffic, etc.). Black & Veatch will:

- Use the General Complaint Resolution Form (refer to Exhibit 2), or a functionally equivalent procedure acceptable to the OPSB, to document and respond to each general complaint.
- Attempt to contact the person(s) making the noise complaint within 24 hours, or 72 hours if the complaint is made over the weekend.
- Conduct an investigation to determine the cause related to the complaint.
- Take all feasible measures to reduce or prevent the recurrence of the complaint.
- Submit a report documenting the complaint and the actions taken. The report will include a complaint summary, including final results of mitigation efforts, and if obtainable, a signed statement by the complainant stating that the problem is resolved to the complainant’s satisfaction.

The reports will be filed and maintained by the Site Manager documenting the resolution of the complaint.

EXHIBIT 1 - NOISE COMPLAINT RESOLUTION FORM

Oregon Clean Energy Center		
NOISE COMPLAINT LOG NUMBER _____		
Complainant's name and address:		
Phone number: _____		
Date complaint received: _____		
Time complaint received: _____		
Nature of noise complaint:		
Definition of problem after investigation by plant personnel:		
Date complainant first contacted: _____		
Initial noise levels at 3 feet from noise source: _____	dBA	Date: _____
Initial noise levels at complainant's property: _____	dBA	Date: _____
Final noise levels at 3 feet from noise source: _____	dBA	Date: _____
Final noise levels at complainant's property: _____	dBA	Date: _____
Description of corrective measures taken:		
Complainant's signature: _____ Date: _____		
This information is certified to be correct:		
Site Manager's Signature: _____		

(Attach additional pages and supporting documentation, as required).

EXHIBIT 2 - GENERAL COMPLAINT RESOLUTION FORM

Oregon Clean Energy Center
GENERAL COMPLAINT LOG NUMBER _____ Complainant's name and address: Phone number: _____
Date complaint received: _____ Time complaint received: _____
Nature of complaint:
Definition of problem after investigation by plant personnel: Date complainant first contacted: _____
Description of corrective measures taken: Complainant's signature: _____ Date: _____
This information is certified to be correct: Site Manager's Signature: _____

(Attach additional pages and supporting documentation, as required).

EMERGENCY ACTION PLAN REFERENCE MANUAL

816 N. Lallendorf Rd.
Oregon, OH 43616

B&V PROJECT NO. 184704

PREPARED FOR

Oregon Clean Energy Center

8 SEPTEMBER 2014



Proprietary Statement

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Emergency Action Plan Quick Reference*

IN CASE OF EMERGENCY

Medical Emergency	<ol style="list-style-type: none"> 1. Call TBD for Emergency Responders. 2. After normal working hours, contact Security at TBD. 3. Provide the specific location and the nature of the injury. 4. Call 911 to report the emergency or to request an ambulance. 5. Provide the following address: 816 N. Lallendorf Rd., Oregon, OH 43616 6. Do not move the affected person unless necessary to prevent further injury.
Fire	<ol style="list-style-type: none"> 1. Exit the area. 2. Call Security at TBD. 3. Provide the specific location and the extent of the fire. 4. Call 911 to report the fire. 5. Provide the following address: 816 N. Lallendorf Rd., Oregon, OH 43616 6. Proceed to the designated evacuation assembly area located at TBD. 7. Account for all employees. <p>NOTE: Use portable fire extinguishers only if trained to do so.</p>
Tornado, Weather Disaster	<ol style="list-style-type: none"> 1. Listen for weather alerts and announcements. 2. Go to the area directed by the announcement or take shelter under a sturdy object. 3. Move away from any glass area.
Earthquake, Natural Disaster	<ol style="list-style-type: none"> 1. Listen for announcements. 2. Go to the area directed by the announcement. 3. Move away from any glass area. 4. Account for all employees if building is evacuated.
Bomb Threat	<ol style="list-style-type: none"> 1. Call 911 with the information and notify supervisor. 2. Leave the area only if directed to do so by an announcement. 3. Refer to the list of Black & Veatch emergency coordinators listed in the section "Other Important Phone Numbers."
Suspicious Items	<ol style="list-style-type: none"> 1. Call the Global Security Operations Center Manager at 913-458-1145. 2. Isolate the suspicious item and keep others away.
Active Shooter	<ol style="list-style-type: none"> 1. If there is an accessible escape path Evacuate. 2. If unable to do above, Hide Out. 3. If all else fails, Take Action against the shooter. 4. Call 911 (or emergency number) when safe to do so.
Workplace Violence, Missing Professionals, or other Security Threats	<ol style="list-style-type: none"> 1. Call Security at TBD to report the situation. 2. Do not intervene while violence is in progress if there is any likelihood of further violence or personal injury. 3. Notify the Department Head, Employee Relations Director at 913-458-8583 and Global Security Operations Center at 913-458-1145. 4. For missing professionals or other threats, contact the Global Security Operations Center at 913-458-1145.
Bloodborne Pathogen Exposure	<ol style="list-style-type: none"> 1. Call TBD for Emergency Responders. 2. After normal working hours, contact Security at TBD. 3. Limit access to exposure areas and victims. 4. Define and isolate the hazard area. 5. Use protective equipment and containers.

*Refer to the *Emergency Action Plan Reference Manual* for detailed information regarding these emergencies.

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Emergency Phone Numbers

Ambulance	<u>911</u>
Fire	<u>911 or 419-698-7064</u>
Police	<u>911 or 419-698-7064 (non-emergencies)</u>
National Poison Control Center	<u>800-222-1222</u>
Site Security (During Work Hours)	<u>TBD</u>
Site Security (After Hours)	<u>TBD</u>
Global Security Operations Center (GSOC)	<u>913-458-1145</u>

MEDICAL TREATMENT

Preferred, if Non-Emergency¹

Facility	<u>US HealthWorks Oregon</u>
Address	<u>3028 Navarre Ave.</u>
Phone	<u>419-697-6850</u>
Hours of Operation	<u>US HealthWorks Oregon, M-F 08:00 – 18:00</u>

Non-Emergency* After Normal Work Hours

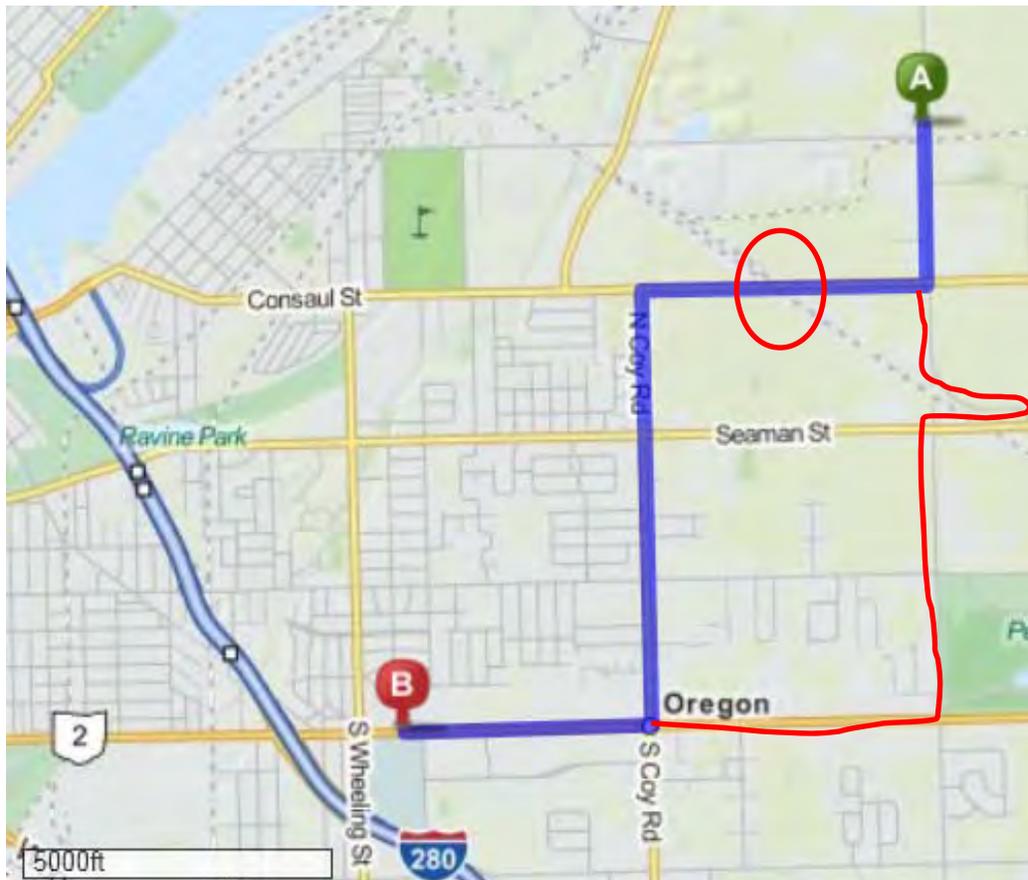
Facility	<u>St. Charles Emergency Room</u>
Address	<u>2600 Navarre Ave.</u>
Phone	<u>419-696-7300</u>
Hours of Operation	<u>24-7</u>

¹Non-emergency refers to a situation where skilled medical care is not needed immediately.

Local Emergency Health Care Facilities

St. Charles Emergency Room

- | | | |
|---|--|---------------------|
| ● | 1. Start out going south on N Lallendorf Rd toward York St. | 0.5 mi
1 minute |
| ↘ | 2. Take the 3rd right onto Corduroy Rd. | 1.0 mi
1 minute |
| ↙ | 3. Turn left onto N Coy Rd. | 1.5 mi
3 minutes |
| ↘ |  4. Turn right onto Navarre Ave / OH-2. | 0.9 mi
1 minute |
| ■ | 5. 2600 NAVARRE AVE. | |



Other Important Phone Numbers

	Office	Cell
Energy Division Environmental, Safety, Health & Security (ESH&S) Manager – <i>Kent Kringen</i>	913-458-4622	913-314-3526
Director and VP of Corporate ESH&S – <i>John H. Johnson</i>	913-458-8225	913-221-4837
Corporate ESH&S Admin/Resource Line – <i>Julie Lauck</i>	913-458-4100	
Global Security Manager – <i>John Kendall</i>	913-458-6597	913-523-4164
Global Security Operations Center (GSOC)	913-458-1145	
Workers' Compensation Coordinator – <i>Carre Schaufler</i>	913-458-8561	
Employee Relations – <i>Craig Anderson</i>	913-458-8583	913-231-4668
Director of Media Relations – <i>George Minter</i>	913-458-8001	913-972-8811
Division HR Contact – <i>Craig Anderson</i>	913-458-8583	913-231-4668
Highway Patrol	419-865-5544	
FBI	216-522-1400	
County Sheriff	419-213-4784	

Black & Veatch Onsite Emergency Coordinators

Tom Magdanz, Field Project Manager	863-602-2098
Kevin Perry, Field ESH&S Manager	304-521-3386
Garrett Wageman, Field ESH&S Specialist	913-645-3710

Introduction

This Emergency Action Plan (EAP) provides information necessary to ensure the health and safety of employees in case of an emergency. This manual can also be used for providing new employees with basic emergency information and as a reference manual for emergency procedures. The EAP may be used by B&V Managers to aid in emergency planning, by site office administrators and specialists who need full details on their plan, and by individual professionals to help with initial reaction to an emergency situation. The manual will tell you the following:

- What to do during an emergency involving illness or injury; fire, tornado, earthquake, or other natural disasters; bomb threats; and workplace violence.
- Emergency escape routes and procedures for your location.
- Procedure to account for all personnel after an emergency evacuation has been completed.
- Names or job titles, locations, and phone numbers of persons or organizations to be contacted during an emergency situation.
- Emergency and important telephone numbers.
- Routes and transit time to emergency care facilities.

EMERGENCY RESPONDERS

Emergency Responders are B&V professionals who have been specially trained to provide first aid and adult CPR in emergency situations. These responders are B&V volunteers who are trained and certified through a nationally recognized certifying agency. Lists containing the names of Emergency Responders are posted on bulletin boards throughout the site buildings/offices and change trailers and are updated regularly. First aid kits are available from all Emergency Responders. Some of these responders may have additional duties, such as ensuring that all professionals in their areas have left during an evacuation.

Subcontractors which have more than 12 personnel onsite, will also be required to have a full-time safety professional monitoring their scope of work. This safety professional will also serve as a Emergency Responder dedicated to their work scope.

TRAINING

All professionals shall be made aware of the EAP for their location or for areas they visit frequently, and know how to access it. The responsible B&V supervisor shall review the plan with all professionals and subcontractors as they are assigned, and periodically thereafter, to ensure that they understand and remain current on emergency procedures. All occupants should familiarize themselves with the locations of applicable medical facilities, building exits, assembly areas, and fire alarm pull stations.

The EAP shall be reviewed at least annually or when responsibilities of personnel or hazards change. Any changes in the plan shall be communicated to all affected employees.

Medical Emergencies Procedures

QUICK REFERENCE

1. Call **TBD** for Emergency Responders.
2. After normal working hours, contact Security at **TBD**.
3. Provide the specific location and the nature of the injury.
4. Call **911** to report the emergency or to request an ambulance.
5. Provide the following address: 816 N. Lallendorf Rd., Oregon, OH 43616
6. Do not move the affected person unless necessary to prevent further injury.

IN MORE DETAIL

Critical Emergencies*

1. If the injury or illness is severe or critical, call **911** immediately and give the address (816 N. Lallendorf Rd., Oregon, OH 43616). Be prepared to answer the operator's questions. Emergency Responders should try to stabilize the injured or ill employee until medical assistance arrives (refer to the section "Request for Ambulance").
2. Call **TBD** for Emergency Responders to treat minor medical emergencies onsite. Render first aid or CPR if qualified to do so.
3. Do not move the affected person unless he or she is in danger of further injury.
4. Direct the emergency personnel to the affected person if an ambulance has been called. Designate one or more persons to do the following:
 - Notify security to stop any vehicles from entering site and open the access control gate.
 - Keep onsite access roads clear for the ambulance.
 - Meet the ambulance at the main access gate and direct them accordingly.
5. Following the emergency assistance, the senior responsible person should contact Division Environmental, Safety, Health & Security (ESH&S) and the Workers' Compensation Coordinator (refer to the section "Other Important Phone Numbers").
6. If the injury or illness requires emergency transportation assistance, the B&V Emergency Responders should arrange for transportation to the appropriate medical facility. If time allows, they should complete the form in the section "Request for Ambulance."
7. In some cases, the injury or illness may require the use of an Automatic External Defibrillator (AED). The AED is a device that defibrillates a victim of sudden cardiac arrest in an attempt to restore the normal heart rhythm. AEDs should be used only by those trained in their use.

*A critical emergency is one where life or limb may be in jeopardy. Emergency Responders may aid in making this distinction if it is not obvious.

Non-Critical Medical Emergencies*

1. Render first aid if qualified to do so.
2. Call **TBD** for Emergency Responders.
3. After normal working hours, contact Security at **TBD**.
4. Provide the specific location and the nature of the injury.
5. Contact the B&V individual responsible for the injured or ill person.
6. If injury or illness is serious, but not life threatening, the supervisor or Emergency Responder should transportation the individual to St. Charles Emergency Room at 2600 Navarre Ave.
7. If the injury involves exposure to a chemical and is a non-emergency situation, the appropriate Safety Data Sheet should be sent with the injured employee to the medical facility. Safety Data Sheets are available from the onsite ESH&S Manager.
8. Report all incidents to the onsite ESH&S Manager.

Emergency Automatic External Defibrillator (AED) Protocol

Do the following in the event of an emergency requiring the use of the AED:

1. Call **TBD** for Emergency Responders. Inform the Emergency Responder of the specific location of the employee.
2. After normal working hours, contact Security at TBD.
3. When the first Emergency Responders who arrive at the scene, one should be designated to be in charge of the emergency situation.
4. Only first aid/CPR trained personnel who have been trained in the proper use of the AED should operate the equipment.
5. During an evacuation, the AED should be kept with one of the Emergency Responders.

*A non-critical medical emergency is one where life or limb is not in immediate danger, and skilled medical care is not needed immediately.

Bloodborne Pathogen Exposure Procedures

QUICK REFERENCE

1. Call **TBD** for Emergency Responders.
2. After normal working hours, contact Security at **TBD**.
3. Limit access to exposure areas and victims.
4. Define and isolate the hazard area.
5. Use protective equipment and containers.

IN MORE DETAIL

This section provides precautions necessary for professionals to use during treatment of emergencies when exposed to blood, body fluids, and other potentially infectious materials. All professionals who administer first aid and CPR as a part of their job duties are required to attend training on bloodborne pathogens and must be offered the Hepatitis B vaccination prior to accepting duties that may expose the individual to potentially infectious materials.

Work Practice Controls

The primary methods used to reduce bloodborne pathogen exposure during emergencies include the following:

- Isolate or contain the hazard.
- Use disposable, puncture-resistant containers that are closeable and leak proof on the sides and bottoms, and properly labeled with the “biohazard” symbol, for used needles, blades, implements of treatment, and/or other regulated waste (blood or other potentially infectious materials in a liquid or semi-liquid state). These containers must be easily accessible, kept upright, replaced routinely and not allowed to be overfilled. When containers of regulated waste are moved, the containers must be securely closed to prevent spillage or leakage. For disposal of biohazard waste, contact the Field ESH&S Manager.
- Use appropriate personal protective equipment, including disposable gloves, surgical masks, protective eyewear, etc.
- Limit access to potential exposure areas.
- Have a bloodborne pathogen exposure kit available and easily accessible.
- Have available germicide hand wipes or hand washing fluid facilities with soap and running water.
- Prohibit storage or consumption of food, drink, tobacco, etc., or the application of contact lenses, cosmetics, lotions or chap-stick in areas of potential exposure.
- Observe universal precautions, all blood and other potentially infectious materials are treated as though they are infectious.

Request for Ambulance Procedures

HAS AN AMBULANCE BEEN CALLED? Yes No

IF NO, DIAL 911 AND ASK FOR AN AMBULANCE.

1. Name of person calling position: _____
2. Are you an Emergency Responder? Yes No
If No, is there one on the scene? Yes No
3. Victim's exact location: _____
Example: 816 N. Lallendorf Rd., Oregon, OH, southeast corner of the HRSG.
4. Nature of problem and care being given: _____
(Example: chest pains)
5. Victim's name: _____
Approximate age: _____

The B&V Emergency Responder will designate persons to do the following:

- Notify security to stop any vehicles from entering site and open the access control gate.
- Keep onsite access roads clear for the ambulance.
- Meet the ambulance at the main access gate and direct them accordingly.

Emergency Facility Map

Name of Facility St. Charles Emergency Room

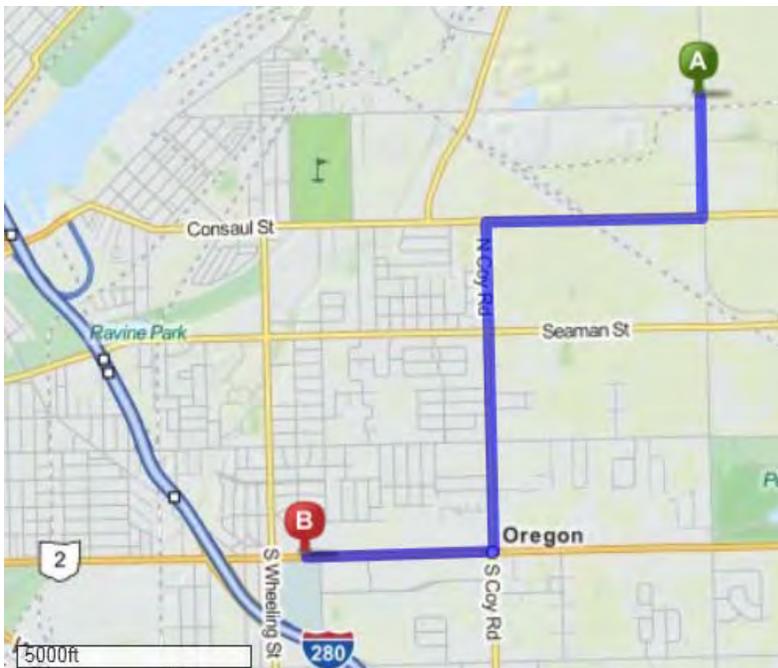
Hours of Operation 24/7

Phone 419-696-7300

Address 2600 Navarre Ave.

St. Charles Emergency Room

- | | | |
|---|---|---------------------|
| ● | 1. Start out going south on N Lallendorf Rd toward York St. | 0.5 mi
1 minute |
| ↘ | 2. Take the 3rd right onto Corduroy Rd. | 1.0 mi
1 minute |
| ↙ | 3. Turn left onto N Coy Rd. | 1.5 mi
3 minutes |
| ↘  | 4. Turn right onto Navarre Ave / OH-2. | 0.9 mi
1 minute |
| ■ | 5. 2600 NAVARRE AVE. | |



Fire Emergency Procedures

QUICK REFERENCE

- | | |
|--------------------------|--|
| If you see fire or smoke | <ol style="list-style-type: none">1. Exit the area.2. Call Security at TBD.3. Provide the specific location and the extent of the fire.4. Call 911 to report the fire.5. Provide the following address: 816 N. Lallendorf Rd., Oregon, OH 436166. Proceed to the designated evacuation assembly area located at TBD.7. Account for all employees. |
|--------------------------|--|

NOTE: Use portable fire extinguishers only if trained to do so.

IN MORE DETAIL

If a fire occurs, the B&V Field ESH&S Manager or designated alternate will determine if emergency assistance is required (refer to the sections titled “Emergency Phone Numbers” and “Other Important Phone Numbers”). In the event of a fire alarm, all employees shall evacuate the premises and assemble in their designated areas. Please note the map at the end of this manual that shows the assembly areas.

Major Emergency

Anyone who discovers a fire or smoke should call Security at **TBD**. If the alarm sounds, the site will be evacuated. The B&V Field ESH&S Manager or designated alternate will attempt to determine that all employees have evacuated safely.

When calling the fire department, be prepared to relay as much of the following information as possible:

- Type of emergency.
- Building number and street address (816 N. Lallendorf Rd., Oregon, OH 43616).
- Specific location where smoke or fire exists.
- Severity of emergency.
- Number of personnel onsite.
- Name and telephone number of the person making the call.

The B&V Field ESH&S Manager or designated alternate must also contact Corporate Environmental Safety, Health & Security (ESH&S).

Minor Emergency

If trained to do so, and if the fire is in a beginning stage, the professional may attempt to extinguish the fire. **Use the portable fire extinguishers only if you have been trained to use them.**

In all cases of major or minor fire emergency, the B&V Field EHS&S Manager or designated alternate should report the incident to Corporate ESH&S.

Evacuation Procedures

QUICK REFERENCE

When an evacuation is ordered:	<ol style="list-style-type: none">1. Immediately stop what you are doing.2. Report to the nearest designated TBD assembly areas.3. Remain in the designated assembly area until instructed otherwise.
--------------------------------	--

IN MORE DETAIL

1. Upon hearing an alarm or if instructed to evacuate, all employees must immediately leave their work area and go directly to the designated evacuation assembly area.
2. Designated Emergency Responders will attempt to account for all employees by sweeping the site to ensure that all professionals have evacuated.
3. Designated Emergency Responders will report to the B&V emergency coordinator on the status of the evacuation in their sectors.
4. Upon the arrival of the fire department, the coordinator will report any missing persons.
5. Occupants will remain in the evacuation assembly area until released by the B&V emergency coordinator or designated alternate.
6. Your location at the time of the evacuation orders will determine your route to the evacuation assembly areas. Go to your designated evacuation assembly area for further instructions. Do not cross a fire to get to an exit; choose an alternate exit.
7. Familiarize yourself with your location onsite and the flow pattern on the evacuation route map located on the last page of this section and the last page of this manual.
8. First Aid/CPR Responders should evacuate with their emergency equipment.
9. The B&V emergency coordinator will be stationed at the B&V Safety Office.
10. Be alert for arriving emergency vehicles and give them the right-of-way.
11. Schedule evacuation drills at least quarterly and critique and document evacuation effectiveness.

Tornado and Weather Disaster Procedures

QUICK REFERENCE

A **tornado warning** means that a tornado has been detected and may be approaching the area. A **tornado watch** indicates that weather conditions are right for a tornado to form. The basic response to a tornado **warning or watch** is as follows:

- | | |
|-------------------------------|---|
| Tornado/Severe Weather | <ol style="list-style-type: none">1. Listen for announcements.2. Go immediately to the area directed by the announcements.3. Move away from any glass or loose materials. |
|-------------------------------|---|

IN MORE DETAIL

The B&V supervisor or designated alternate will attempt to make the decision for an evacuation in any natural disaster event if time is available. When alerted to an impending tornado or other severe weather, the B&V coordinator or designated alternate will relocate all employees and visitors to the designated shelter area (**TBD**) and attempt to account for all employees.

Typical severe weather shelter areas are located in **TBD**.

The following will occur for any severe weather:

1. Impending emergency will be announced over the intercom if information and time permit.
2. Move out of offices on the building's perimeter and close the doors.
3. Go to the designated shelter area (interior conference rooms). Wait for further instructions.
4. Do not leave the building unless instructed to do so.
5. If no advanced warning has been given, take shelter under a sturdy object such as a desk.
6. Stay away from windows, potential falling objects, and open areas.
7. If building damage occurs, leave the building when safe to do so and assemble in designated areas. Do NOT use matches or lighters for light. Avoid all electrical use.

Earthquake Emergency Procedures

QUICK REFERENCE

Earthquake, Natural Disaster	<ol style="list-style-type: none">1. Immediately take cover under a desk/table or in a doorway.2. Move away from any glass area.3. Listen for announcements and account for all employees if building is evacuated.
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IN MORE DETAIL

An earthquake may hit without warning. There may be no siren, alarm or radio tone signals to alert you. All employees should be familiar with the workspaces in their office so they can find shelter without hesitation. When time allows, do the following:

1. Move away from windows, cabinets, or other potential falling hazards.
2. Take cover under desks, strong tables, or door frames during tremors.
3. Drop to your knees or sit with your upper torso bent forward.
4. Put head down toward knees, hands clasped behind neck, arms against ears, and eyes closed. Hold that position for a minimum of 60 seconds after shaking stops.
5. Use jackets or other materials for head protection.
6. Be silent and listen for additional directions.
7. Stay calm, and be prepared for aftershocks.
8. Avoid all exposed electric lines.
9. DO NOT smoke or use matches or open flames.
10. DO NOT attempt to leave the building until you are advised to do so by management or emergency personnel or the tremors stop. Most injuries occur from falling objects during a panic evacuation.
11. As soon as practical after the event, assess conditions and further required actions.

Workplace Violence Procedures

QUICK REFERENCE

Threat of Violence	<ol style="list-style-type: none"> 1. Call Security at TBD to report the situation. 2. Assess the situation before intervening. 3. Do not become a victim yourself.
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IN MORE DETAIL

Black & Veatch's goal is to provide a working environment for its employees, subcontractors, and any visitors that is free from violence. Verbal or physical aggression and threats of violence, whether directed at a supervisor, coworker, client, vendor, or visitor, are prohibited.

An employee who threatens, initiates, or participates in any act of violence while on the site premises, including parking lots, will be subject to disciplinary action up to and including termination of employment, arrest and prosecution. Any subcontractor or visitor who instigates or performs an act of violence or intimidation on company property, including parking lots, will be subject to arrest and prosecution.

Act of Violence in Progress

1. Call security at **TBD** and report the situation.
2. Be prepared to direct security to the incident.
3. Do not attempt to intervene physically or verbally.
4. If the situation merits it, advise those nearby to move away from the area.
5. Follow directions of security when they arrive.
6. Do not evacuate the site unless directed to do so.

Threat of Violence

1. If you hear, observe or receive a threat, contact security at **TBD**.
2. Take all threats seriously.

Active Shooter Procedures

QUICK REFERENCE

Active Shooter Situation	<ol style="list-style-type: none"> 1. If there is an accessible escape path Evacuate. 2. If unable to do above, Hide Out. 3. If all else fails, Take Action against the shooter. 4. Call 911 (or emergency number) when safe.
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IN MORE DETAIL

An Active Shooter is an individual actively engaged in killing or attempting to kill people in a confined and populated area; in most cases Active Shooters use firearm(s) and there is no pattern or method to their selection of victims. In other cases, the intended victim(s) are co-workers, ex-co-workers, or intimate partners.

Active Shooter situations are unpredictable and evolve quickly. Typically, the immediate deployment of law enforcement is required to stop the shooting and mitigate harm to the victims. Because active shooter situations are often over within 10 to 15 minutes, before law enforcement arrives at the scene, employees must be prepared both mentally and physically to deal with an active shooter situation.

Best Practices in an Active Shooter Situation

1. Be aware of your environment and any possible dangers.
2. Take note of the two nearest exits in any facility or location you are in or visit.
3. Place your cell phones on vibrate or silent to not give away your location.
4. If you are in an office or restroom, stay there and secure the door. Try to barricade the door with furniture, boxes, chairs, etc. If you are in a room that the door opens out try to secure it by using a belt around the door knob and tie it to something or hold tight to it. Wrap the belt around the closer arm to prevent it from being opened.
5. If you are in a hallway, get into a room and secure the door.
6. As a last resort, attempt to take the Active Shooter down. When the shooter is at close range and you cannot flee, your chance of survival is much greater if you try to incapacitate him/her. Use everything as a weapon and throw anything you can at their face/head. This will distract the person and break their concentration.
7. CALL 911 WHEN IT IS SAFE TO DO SO! Stay calm give as much detail as possible location of where you are and the location of the shooter if known, what the person was wearing if known, who it is if known.

How to React when Law Enforcement Arrives

1. Remain calm and follow officers' instructions.
2. Put down any items in your hands, immediately raise your hands and spread your fingers, keeping hands visible at all times.
3. Avoid making quick movements toward officers, pointing, screaming or yelling.
4. Do not stop to ask officers for help or direction if evacuating.
5. If you secure a weapon from the shooter place it in a trash can and carry the trash can over your head with your hands visible to law enforcement.

When Safe

Contact the Global Security Operations Center or the appropriate Regional Security Manager.

Title	Contact	Office No.	Cell No.	E-mail
Global Security Manager	John Kendall	913-458-6597	913-523-4164	KendallJR@bv.com
Regional Security Manager-Americas	Tom Krupp	913-458-2361	913-207-8488	KruppTM@bv.com
Global Security Operations Center	Duty Officer	913-458-1145		

Remember in most of these situations the person that is doing the shooting has come to do HARM! They are not planning on going home. Time and distance is in your favor, attempt to get both when possible. When you cannot escape create mass chaos, create sounds, sights, and touches that will increase the skill level required to harm people. Hitting a passive, static target is easy. Chaos and movement will increase the skill required to do harm.

A.L.Ⓢ.C.E.

- Alert! - Get the word out!
- Lockdown - If you can't get out, hide out (barricade, impede access, etc.)
- Ⓢnform - communicate with others and inform authorities
- Counter - apply skills to distract, confuse, and gain control
- Evacuate - reduce the number of potential targets for the shooter, and reduce the chances of victims resulting from friendly fire when help arrives

Bomb Threat Procedures

QUICK REFERENCE

Bomb Threat	<ol style="list-style-type: none"> 1. Call <u>911</u> with the information. 2. Signal others if possible to aid you in monitoring the call. 3. Fill out the bomb threat checklist as much as possible. 4. If you were/are not the person receiving the call, leave the area as directed by the announcement.
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IN MORE DETAIL

Report call immediately to: Global Security Operations Center

Phone No.: 913-458-1145

A majority of bomb threats to businesses are hoaxes that result in nothing more than a disrupted work routine. The threat **must be taken** seriously, however, and appropriate action taken.

Personnel who are likely to receive bomb threats should follow the sequence of actions below and have on hand a copy of the Bomb Threat Checklist, which follows:

1. If the threat is received by phone, keep the caller on the line as long as possible and get as much information as possible (refer to checklist).
2. Immediately inform the appropriate B&V Field ESH&S Manager or designated alternate (refer to the list in the section titled "Other Important Phone Numbers") who will determine with the fire and police departments whether the building should be evacuated. Tell no one else.
3. All bomb threats are to be reported to the Global Security Operations Center at 913-458-1145.

Bomb Threat Checklist

Note: Print this sheet and provide the most complete information possible.

Name of person receiving threat: _____	Phone No.: _____	Location: _____
Department: _____		

Sex of Caller: _____	Race: _____
Age: _____	Length of call: _____
Number at which call is received: _____	
Time: _____	Date: _____

ASK THE CALLER:

1. When is the bomb going to explode? _____
2. Where is it right now? _____
3. What does it look like? _____
4. What kind of bomb is it? _____
5. What will cause it to explode? _____
6. Did you place the bomb? _____
7. Why? _____
8. What is your address? _____
9. What is your name? _____

WORDING OF THREAT:

WAS THE CALLER'S VOICE:

<input type="checkbox"/> Calm	<input type="checkbox"/> Nasal
<input type="checkbox"/> Angry	<input type="checkbox"/> Stuttering
<input type="checkbox"/> Excited	<input type="checkbox"/> Lisp
<input type="checkbox"/> Slow	<input type="checkbox"/> Raspy
<input type="checkbox"/> Rapid	<input type="checkbox"/> Deep
<input type="checkbox"/> Soft	<input type="checkbox"/> Ragged
<input type="checkbox"/> Loud	<input type="checkbox"/> Clearing Throat
<input type="checkbox"/> Laughing	<input type="checkbox"/> Deep Breathing
<input type="checkbox"/> Crying	<input type="checkbox"/> Crackling Voice
<input type="checkbox"/> Normal	<input type="checkbox"/> Disguised
<input type="checkbox"/> Distinct	<input type="checkbox"/> Accented
<input type="checkbox"/> Slurred	<input type="checkbox"/> Familiar

If voice is familiar, whom did it sound like?

WERE THERE BACKGROUND SOUNDS?

<input type="checkbox"/> Street Noises	<input type="checkbox"/> Animal Noises
<input type="checkbox"/> Dishes	<input type="checkbox"/> Clear
<input type="checkbox"/> Voices	<input type="checkbox"/> Static
<input type="checkbox"/> PA System	<input type="checkbox"/> Local
<input type="checkbox"/> Music	<input type="checkbox"/> Long Distance
<input type="checkbox"/> House Noises	<input type="checkbox"/> Booth
<input type="checkbox"/> Motor	<input type="checkbox"/> Other
<input type="checkbox"/> Factory Machinery	_____

THREAT LANGUAGE:

<input type="checkbox"/> Well Spoken	<input type="checkbox"/> Incoherent
<input type="checkbox"/> Foul Language	<input type="checkbox"/> Taped
<input type="checkbox"/> Irrational	<input type="checkbox"/> Message Read

Remarks: _____

Suspicious Items Procedures (Packages and Letters)

QUICK REFERENCE

Suspicious Items, Packages, and Letters	<ol style="list-style-type: none"> 1. Do not panic; call the Global Security Operations Center at <u>913-458-1145</u>. 2. Contact your supervisor. 3. Isolate the suspicious item, do not move it, and keep others away. 4. Be prepared to remain at location.
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IN MORE DETAIL

If an improvised explosive device (IED) or biological or chemical weapon is left at the site or mailed via the postal or delivery system, employees must be protected. Plans and training must be put into place to detect such items prior to their use or to mitigate their results upon discovery or opening.

Detection of a Suspicious Item (such as a backpack, briefcase, etc.) in an Unusual Location

1. Do not panic.
2. Contact your supervisor.
3. Attempt to determine ownership among other professionals present.
4. If directed or if in doubt, call 911 (or local emergency number).
 - Contact Global Security Operations Center at 913-458-1145.
5. Contact the 24x7 B&V news media information line at 866-496-9149.

Delivery of a Suspicious Package or Letter

1. Do not panic.
2. Contact your supervisor.
3. Isolate the package or letter.
4. Leave the package or letter sealed; only emergency personnel should open or touch it.
5. Leave the package or letter in place.
6. Protect the package or letter in a plastic bag and/or cover it up.
7. Keep others away.
8. Consider shutting down the HVAC systems, if applicable.
9. If directed or if in doubt, call 911 (or local emergency number).
 - Contact Global Security Operations Center at 913-458-1145.
10. Contact the 24x7 Black & Veatch new media information line at 866-496-9149

Other Security Threats: Procedures

QUICK REFERENCE

1. Immediately call the Global Security Operations Center at [913-458-1145](tel:913-458-1145).
2. Notify the Global Security Operations Center before notifying any police or government agencies.

IN MORE DETAIL

1. Threats of violent acts toward B&V employees, visitors, vendors, or subcontractors should be reported to the Global Security Operations Center immediately.
2. Call the Global Security Operations Center at the following phone number:

913-458-1145
3. Call the Global Security Operations Center before notifying any police or government agencies.
4. Threats include bomb threats; telephone threats; threats via the mail or communicated electronically or verbally; threats to commit acts of violence upon any B&V employee or property; threats against any visitors, vendors, or subcontractors associated with B&V; and threats to extract money or assets from B&V in lieu of committing any act of violence or other criminal acts (e.g., criminal vandalism or destruction). In the case of bomb threats, this notification may take place after you have followed your EAP (refer to Bomb Threat section).

Missing Professionals Procedures

QUICK REFERENCE

1. Immediately call the Global Security Operations Center at 913-458-1145.
2. Notify the Global Security Operations Center before notifying any police or government agencies.

IN MORE DETAIL

1. If any person, professional, visitor, vendor, or subcontractor does not report at the arranged time or you are unable to contact these persons, and reasonable efforts have been undertaken to determine the location and status of these individuals, you are to immediately notify the Global Security Operations Center.
2. Call the Global Security Operations Center at the following phone number:

913-458-1145
3. Call the Global Security Operations Center before notifying any police or government agencies.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

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in

Case No(s). 12-2959-EL-BGN

Summary: Correspondence of Oregon Clean Energy Center, LLC in Compliance with Opinion, Order, and Certificate electronically filed by Teresa Orahoad on behalf of Sally Bloomfield