



COLUMBUS | CLEVELAND
CINCINNATI-DAYTON
MARIETTA

BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
MAIN: 614.227.2300
FAX: 614.227.2390

www.bricker.com
info@bricker.com

Sally W. Bloomfield
614.227.2368
sbloomfield@bricker.com

March 7, 2016

Via Electronic Filing

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

**Re: Clean Energy Future-Lordstown, LLC,
OPSB Case No. 14-2322-EL-BGN**

Dear Ms. McNeal:

The September 17, 2015, Opinion, Order, and Certificate ("Certificate") approving Clean Energy Future-Lordstown, LLC ("CEFL") Certificate of Environmental Compatibility and Public Need to Construct the Lordstown Energy Center established a set of conditions as part of the Certificate.

Within this set of conditions, **Condition No. 6** requires that:

At least 30 days prior to the preconstruction conference, the Applicant shall have in place a complaint resolution procedure to address potential public grievances resulting from project construction. The resolution procedure must provide that the Applicant will work in good faith to mitigate or resolve any issues with those who submit a complaint. The Applicant shall provide the complaint resolution procedure to Staff, for review and confirmation that it complies with this condition.

Attached is a copy of CEFL's Complaint Resolution Procedure, which was provided to OPSB Staff on February 12, 2016. Thus, this letter is to inform the OPSB Staff that CEFL is in compliance with **Condition No. 6**.

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

Sincerely,

Sally W. Bloomfield

Attachment

cc: Jon Whitis (w/Attachment)

Complaint Resolution Procedure

Clean Energy Future – Lordstown

Trumbull County, Lordstown, Ohio

February 2016

Prepared for:

Siemens

Prepared by:

Tetra Tech, Inc.

6715 Tippecanoe Road, Suite C201
Canfield, OH 44406

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INTRODUCTION

This procedure defines the requirements and process for management of complaints received during the construction, startup, and commissioning of the Clean Energy Future - Lordstown project. In all cases, Siemens will work to resolve or mitigate any issues with those who submit a complaint. In addition, Siemens 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 Siemens is in control of the unit. Following substantial completion and commercial operation, the Owner will take control of this process.

Siemens 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.

NOISE COMPLAINT PROCESS

Throughout the construction, startup, and commissioning of the Clean Energy Future - Lordstown, Siemens will document, investigate, evaluate, and attempt to resolve all project-related noise complaints. Siemens 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.

NOISE CONTROL MEASURES

The Project will incorporate design features to minimize potential noise impacts on the surrounding community. Sound resulting from Project operation will be minimized through design measures both inherent in the equipment and added for additional attenuation. Through the modeling process, alternative noise control mitigation measures underwent two evaluations before they were incorporated in the final noise mitigation design. First, all major potential noise sources were entered into the software model. Next, candidate mitigation strategies were tested and applied or discarded until the design was optimized. Specific measures may be refined through final design details, but will be required to be fully compliant with the applicable standards. The following mitigation measures have been included in this analysis to demonstrate that compliant sound levels can be achieved by the Project:

- Project siting to achieve an adequate distance buffer between noise sensitive areas and noise-producing equipment;
- Combustion and steam turbines and the steam turbine generators will be housed in acoustical enclosures equipped with acoustic silencers and attenuators as required to reduce noise emissions from ventilation openings, fans, and make-up air units.
- Safety and relief valves that release high pressure steam will be equipped with silencing, to the extent permitted by the American Society for Mechanical Engineers code;
- A combustion turbine inlet silencing package designed to reduce air inlet sound power levels below the base design inlet silencer;
- Acoustical lagging of the CTG exhaust diffuser as it exits the turbine compartment and enters the HRSG;
- On-site gas compressors (if required) will be located within a self-contained building with sound insulation.
- A stack silencing package inclusive of the HRSG will be designed to achieve a total sound power level of 114 dBA to reduce sound pressure levels leaving the flue in the stack structure, which is consistent with Siemens plan to install HRSG exhaust silencing;
- National Electrical Manufacturers Association low-noise-rated step-up transformers associated with the CTG and the STG, combined with the use of fire walls and acoustical barriers will further serve to reduce offsite transformer noise levels;
- A low-noise design WCT is specified in the design. Use of splash attenuators or other acoustical treatments will be applied as necessary to achieve far-field acoustic design targets; and
- For balance of plant components, no additional mitigation is required beyond what is typically provided by the manufacturers as part of their standard design. This may include the use of low-noise gas heaters and housing large pumps and air compressors associated with the HRSG and power train (i.e. boiler feed water pumps, vacuum pumps, and fuel oil forwarding pumps) in buildings or acoustical enclosures.

In addition, all equipment will include sound attenuation to meet OSHA nearfield sound levels whenever practical. Hearing protection will be mandatory in any areas where this is not practical.

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.

NOISE COMPLAINT PROCEDURAL STEPS

At least 10 days prior to the start of ground disturbance, the project Owner shall 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, Siemens 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.

Verification Prior to ground disturbance, the project Owner shall transmit to the Siemens 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.

At least 10 days prior to the first steam blow(s), the project Owner shall 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.

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.

MISCELLANEOUS COMPLAINT PROCESS

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

Lordstown 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

Lordstown 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)

This foregoing document was electronically filed with the Public Utilities

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Case No(s). 14-2322-EL-BGN

Summary: Correspondence of Clean Energy Future-Lordstown in Compliance with Condition No. electronically filed by Teresa Orahod on behalf of Sally Bloomfield