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June 1, 2016

Ms. Barcy F. McNeal
c/o Public Utilities Commission of Ohio
180 E. Broad St., 11th Floor
Columbus, OH 43215-3793

Re: Paulding Wind Farm III LLC
OPSB Case No. 15-1737-EL-BTX
Condition Compliance

Dear Ms. McNeal:

Please find attached a copy of email correspondence from Paulding Wind Farm III LLC ("Paulding") to OPSB Staff regarding compliance with Condition 27 of the Certificate of Environmental Compatibility and Public Need for the Timber Road III Transmission Line. In demonstrating compliance with Condition 27, Paulding submitted the following documents to OPSB Staff, copies of which are attached to this letter:

- Ohio EPA Approval of NPDES Construction Site Storm Water General Permit
- Spill Prevention, Control, and Countermeasure Plan
- Storm Water Pollution Prevention Plan

Thank you for your attention to this matter.

Sincerely,

Ryan D. Elliott

RDE/rde
Enclosures

Elliott, Ryan D.

From: Distelrath, Sarah
Sent: Wednesday, April 27, 2016 2:37 PM
To: Jon Pawley (Jon.Pawley@puc.state.oh.us)
Cc: Bowser, Erin; Brooks, Chris
Subject: Timber Road III Transmission Line - Condition 27 - Case Number 15-1737-EL-BTX
Attachments: Acceptance of NOI_TRIII.pdf; TR3 SWPPP_20160407.pdf; 2016-04-11 Draft SPCC Plan - Timber Road III Rev1.pdf

Jon,

NPDES, SWPPP, and SPCC

Attached is the Timber Road III Transmission Line Case Number 15-1737-EL-BTX: SPCC, SWPPP, and Acceptance of NOI from Ohio EPA regarding the NPDES approval and Site Storm Water General Permit.

The Erosion and Sedimentation Control Plan are included within the SWPPP Section IV. (A) on page 9.

Finally the Ohio EPA BMP related to erosion and sediment control can be found in both the private and public road designs for the wind farm project area. You can access this by using the following link: [<https://edpr.securevdr.com/d-s54c7712537443bb9>]

The contents of this email confirms the Applicant has meet Stipulation Condition number 27 for Timber Road III Transmission Line Case Number 15-1737-EL-BTX.

Thank you,
Sarah Distelrath



Sarah Distelrath

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Development - Eastern Region
155 E. Market, Suite 307 Indianapolis, IN 46204
Direct 317.636.0866 Cell 713.449.8224 Fax 317.636.1418
www.edpr.com

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John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

April 13, 2016

PAULDING WIND FARM III, LLC
WAYNE BECK
808 TRAVIS STREET, SUITE 700
HOUSTON, TX 77002

Re: Approval Under Ohio EPA National Pollutant Discharge Elimination System (NPDES) Construction Site Storm Water General Permit OHC000004 (the permit)

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: Paulding Wind Farm III, LLC
Facility Location: Center of project is CR 124 & TR 33
City: Benton
County: Paulding
Township: Benton

Ohio EPA Facility Permit Number: 2GC04434*AG

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 facility permit number. 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 of 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.

You may obtain additional information, copies of the general permit and current forms/instructions from our website at <http://epa.ohio.gov/dsw/storm/index.aspx>. If you have questions, please call 614-644-2001 and ask to speak with a member of the Storm Water Section.

Sincerely,

A handwritten signature in cursive script that reads "Craig W. Butler".

Craig W. Butler
Director

Spill Prevention, Control, and Countermeasure (SPCC) Plan

For Construction of the

Timber Road III Wind Farm Paulding County, Ohio

Prepared for:

IEA Renewable Energy
2647 Waterfront Pkwy E Dr, Suite 100
Indianapolis, IN 46214

Prepared by:

Westwood

Westwood Professional Services, Inc.
7699 Anagram Drive
Eden Prairie, Minnesota 55344

Project Number: 0007159.00

April 11, 2016

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Figure 2: Laydown Yard Layout
Figure 3: Remote Site Typical Layout
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APPENDICES

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Appendix B: Plan Review Log
Appendix C: Emergency Contacts
Appendix D: Discharge Notification Form
Appendix E: Record of Secondary Containment Drainage
Appendix F: Calculation of Secondary Containment Capacity
Appendix G: Monthly Facility Inspection Checklist
Appendix H: Discharge Prevention Briefings and Training Log

1.0 INTRODUCTION

1.1 Purpose of the SPCC Plan

This Spill Prevention, Control, and Countermeasure (SPCC) Plan has been prepared for IEA Renewable Energy (IEA) for the construction of the Timber Road III Wind Farm located in Paulding County, Ohio (see **Figure 1**). The Project is located approximately 3 miles northwest of Payne, Ohio. The total Project encompasses an area of approximately 7,807 acres; however, construction activity and disturbed area will consist of approximately 396 acres. The Project consists of the construction of up to 48 wind turbines with associated access roads, temporary crane walk paths, underground collection lines, overhead transmission line, project substation and a temporary construction laydown yard.

The purpose of the SPCC Plan is to describe the procedures, methods, and equipment that are used to prevent the discharge of oil into navigable waters of the United States or their adjoining shorelines, and to minimize and abate hazards to human health and the environment should such an event occur.

SPCC plans are prepared and implemented according to U.S. EPA regulations contained in Title 40, Code of Federal Regulations, Part 112 (40 CFR 112). A non-transportation related facility is subject to SPCC regulations if: the total aboveground storage capacity exceeds 1,320 gallons; or the underground oil storage capacity exceeds 42,000 gallons; and, if due to its location, the facility could reasonably expect to discharge oil into or upon the navigable waters of the United States. At this Facility, as defined in Section 2.1, the total aboveground oil storage capacity is over 1,320 gallons; therefore, SPCC regulations apply.

For the purposes of the SPCC Plan, the term “Facility” is defined as three areas:

1. The ± 10 -acre temporary construction laydown yard (Laydown Yard – **Figure 2**)
2. The individual 48 wind turbine construction sites, associated access roads, collection lines (Remote Sites – **Figure 3**)
3. The ± 2 -acre substation (Substation – **Figure 4**)

The threat of substantial harm caused by the Facility has been evaluated and certified by IEA management. It has been determined that this Facility does not pose a risk for substantial harm and that preparation of a Facility Specific Response Plan, pursuant to 40 CFR 112.20, is not required. The Substantial Harm Determination certification is included as **Appendix A**.

1.2 Professional Engineer Certification

I certify that I am the preparer of this SPCC Plan or it was prepared under my direct supervision..

Furthermore, I certify the following with respect to this Federal SPCC Plan:

- I am familiar with the applicable requirements of 40 CFR 112;
- I have visited and examined the Facility, or have supervised examination of the Facility by appropriately qualified personal;
- This SPCC Plan has been prepared in accordance with good engineering practice;
- The procedures for required inspections and testing have been established; and
- The SPCC Plan is adequate for the Facility, as herein described.

This certification in no way relieves the owner or operator of the Facility of his/her duty to prepare and fully implement the SPCC Plan in accordance with the requirements of 40 CFR 112.

Signature

Daniel D. Beckmann

Name

77712

Ohio PE Registration Number

Date

952-906-7424

Telephone Number

1.3 Management Certification of the SPCC Plan

The Owner of the Timber Road III Wind Farm is Paulding Wind III, LLC. Paulding Wind III, LLC has engaged IEA Renewable Energy as the General Contractor for the Project. This SPCC Plan is being managed by IEA and applies to construction of the Project. Paulding Wind III, LLC will prepare a separate SPCC Plan for the construction of the operations and maintenance portion of the Project that will go into effect once construction is complete.

IEA is committed to preventing discharges of oil into navigable waters of the United States through implementation and regular review and amendment to the SPCC Plan during construction of the Timber Road III Wind Farm. IEA has committed the necessary resources to implement the measures described in this SPCC Plan.

I am the designated SPCC Emergency Coordinator and am responsible for implementation of this SPCC Plan. To the best of my knowledge, this SPCC Plan is accurate.

Ben Clevinger

Project Engineer, IEA

Title

Date

1.4 Location of the SPCC Plan

A complete copy of the SPCC Plan will be maintained at the Facility when the Facility is normally attended at least four hours per day or at the nearest field office when the Facility is attended less than four hours per day.

Because the Laydown Yard is typically attended from 7:00 am to 7:00 pm, the copy of the SPCC Plan will be located in the main office area in the IEA construction trailer at the Laydown Yard. Notice of the location of the SPCC Plan will be posted on the Project information board in the Laydown Yard.

1.5 Plan Review

Review and amendments to the SPCC Plan must be made as stated in 40 CFR 112.5 under any of the following circumstances:

- Complete a review and evaluation of the SPCC Plan at least every five years;
- There is a change in Facility design, construction, operation or maintenance that materially affects the Facility's potential for discharge of oil into navigable waters of the United States; and
- In the event of a spill into waters of the United States or adjoining shorelines.

As a result of the review listed above, the SPCC Plan will be amended within six months to include more effective prevention and control measures for the Facility, if applicable. Amendments will be implemented as soon as possible, but no later than six months following the SPCC Plan amendment.

The review and evaluation must be documented in a Plan Review Log, the form of which is contained in **Appendix B**. The Plan Review Log must state whether the SPCC Plan will be amended. Any technical revision to the SPCC Plan must be certified by a Professional Engineer.

1.6 SPCC Provision Cross-Reference

This SPCC Plan does not follow the exact order presented in 40 CFR part 112. **Table 1-1** below presents a cross-reference of Plan sections relative to the applicable parts of 40 CFR part 112.

Table 1-1: SPCC Cross-Reference		
Provision	Plan Section	Page
112.3(d)	1.2 Professional Engineer Certification	2
112.3(e)	1.4 Location of SPCC Plan	4
112.5	1.5 Plan Review	4
112.7	1.3 Management Certification of the Plan	3
112.7	1.6 SPCC Provision Cross-Reference	5
112.7(a)(3)	Part 2: General Facility Information	6
	Figures 1-5	Attached
112.7(a)(4)	4.4 Discharge Notification	18
112.7(a)(5)	Part 4: Discharge Response	15
112.7(b)	3.3 Potential Discharge Volumes and Direction of Flow	9
112.7(c)	3.5 Containment and Diversionary Structures	10
112.7(d)	3.6 Practicability of Secondary Containment	11
112.7(e)	3.7 Inspections, Tests, and Records	11
112.7(f)	3.8 Personnel, Training and Discharge Prevention Procedures	12
112.7(g)	3.9 Security	12
112.7(h)	3.10 Tank Loading/Unloading	13
112.7(i)	3.11 Brittle Fracture Evaluation	15
112.7(j)	3.12 Conformance with Applicable State and Local Requirements	15
112.8(b)	3.4 Facility Drainage	10
112.8(c)(1)	2.3 Oil Storage	8
112.8(c)(2)	3.5 Containment and Diversionary Structures	10
112.8(c)(3)	3.4 Containment Drainage	10
112.8(c)(6)	3.7 Inspections, Tests, and Records	11
112.8(c)(8)	3.5 Containment and Diversionary Structures	10
112.8(c)(10)	3.7 Inspections, Tests, and Records	11
112.8(d)	3.7 Inspections, Tests, and Records	11
112.20(e)	Certification of Substantial Harm Determination	Appendix A
112.20(f)(2)(i)	2.4 Discharge Potential	8

2.0 GENERAL FACILITY INFORMATION

2.1 Description of the Facility

Owner: Paulding Wind III, LLC

Operator/Construction Manager: IEA Renewable Energy

The address and phone number for the Project Facility Laydown Yard is:

Timber Road III Wind Farm

5104 Road 60

Payne, OH 45880

[phone number TBD]

The Project Location Map shown on a U.S. Geological Survey quadrangle map is attached as **Figure 1**. The Facility defined by this SPCC Plan consists of three distinct components described above in Section 1.1. The Facilities are located in Paulding County, Ohio.

Construction activity will disturb an area consisting of approximately 396 acres, consisting of both temporary and permanent improvements.

The majority of contaminants will be stored at the temporary construction Laydown Yard. Oil storage primarily occurs at the Laydown Yard where oil products are stored in several aboveground storage tanks (AST) for use during construction. The tanks are used by IEA and its subcontractors primarily to store fuel and other vehicle fluids. A fuel truck is used to transport fuel from the Laydown Yard to the construction equipment as needed.

Hours of operation for the Facility are typically between 7:00 am and 7:00 pm. There are construction trailers/offices at the Laydown Yard that are used by Paulding Wind III, LLC, IEA and other subcontractors. Access to the Laydown Yard is off of Road 60 and is surrounded by agricultural land.

At the Remote Sites, construction will include using distinct crews for the construction of each component of the turbines. The crews move from turbine site to turbine site as the construction progresses, and may be at 2-3 sites per day. The number of active turbine construction sites varies, but typically there may be construction occurring at up to approximately 40 different sites.

2.2 Administration of Responsibility

To fully implement this SPCC Plan, the assistance and cooperation of multiple parties is required. The following descriptions outline key roles and responsibilities involved in the implementation of this SPCC Plan.

Paulding Wind III, LLC

Paulding Wind III, LLC is the owner of the Timber Road III Wind Farm. Paulding Wind III, LLC has engaged IEA Renewable Energy as the General Contractor for the Project. Owner's responsibilities include:

- Ensure those who work with oil on the Project are aware of and follow the requirements of this SPCC Plan;
- Follow the established policies and procedures of this SPCC Plan; and
- Enforce the requirements of the SPCC Plan and have overall responsibility of the Project and SPCC Plan requirements.

IEA Renewable Energy

IEA Renewable Energy is the General Contractor for the construction of the Timber Road III Wind Farm. IEA is responsible for the construction of the wind turbines, associated access roads, underground collection, overhead transmission line, turbine foundations, laydown yard and substation. IEA will engage subcontractors for the foundations, underground electrical, overhead transmission, substation, as well as an oil company to supply fuel for the Project. Specific responsibilities include:

- Serve as SPCC Emergency Coordinator;
- Perform inspections to ensure compliance with the provisions of this SPCC Plan;
- Coordinate training and maintain training records;
- Maintain security of oil storage areas;
- Notify Paulding Wind III, LLC of any releases;
- Investigate oil releases;
- Provide the proper notification for environmental releases;
- Ensure corrective action is taken in the event of a release;
- Coordinate disposal of waste materials;
- Ensure that emergency response equipment is available and working properly; and
- Update the SPCC Plan as required.

Subcontractors

Subcontractors will be selected and include foundations, underground electrical, overhead transmission and substation. Subcontractor responsibilities include:

- Follow the established policies and procedures of this SPCC Plan;
- Adhere to fuel transfer procedures established in the SPCC Plan;
- Ensure personnel have appropriate training; and
- Inform IEA of any releases and ensure that corrective action is taken.

2.3 Oil Storage

Contractor shall use storage containers that are compatible with the material stored within considering pressure and temperature.

Bulk oil storage at the Facility consists of numerous fixed ASTs, the main power transformer and various 55 gallon drums. An inventory of the products stored at the Facility is shown in **Table 2.1**. All containers with capacity of 55 gallons or more are included, unless otherwise exempt from the rule.

Table 2-1: Oil Storage Inventory				
ID	Capacity (gallons)	Content	Description	Party Responsible for Oil Storage
Fixed Storage in Laydown Yard				
1	2,000	Diesel	Aboveground Storage Tank (double-walled tanks)	IEA
2	1,000	Unleaded Gasoline	Aboveground Storage Tank (double-walled tanks)	IEA
3	55 (ea)	Concrete Curing Compound	(3) 55-gallon drums (within containment tub)	IEA
4	55 (ea)	Hydraulic Fluid	(2) 55-gallon drums (within containment tub)	IEA
Remote Sites				
5	135 (ea)	Gearbox Oil	(48) WTG Gearboxes (Self-Contained within nacelle)	Turbine Supplier
6	76 (ea)	Hydraulic Oil	(48) WTG Hydraulic Units (Self-Contained within nacelle)	Turbine Supplier
Substation				
7	16,589	Dielectric Fluid	Main Power Transformer (within secondary containment pit)	IEA

Oil tanks used at this Facility are constructed of steel or plastic. The design and construction of all bulk storage containers is compatible with the characteristics of the oil product they contain, and with applicable temperature and pressure conditions.

2.4 Discharge Potential

The Laydown Yard (**Figure 2**) is located on relatively flat terrain and consists of a compacted gravel surface. Drainage generally flows north within the Laydown Yard and eventually reaches Flatrock Creek approximately 2.5 miles north of the Laydown Yard.

Discharge potential for the Remote Sites (**Figure 3**) is primarily associated with construction equipment refueling and breakdowns. The direction of discharge and release potential at the Remote Sites varies depending upon the individual locations of the turbines, access roads and collection lines.

The Substation (**Figure 4**) is located on relatively flat terrain and consists of a compacted gravel surface. Drainage generally flows north within the Substation and eventually reaches South Creek approximately 1.5 miles north of the Substation.

Because this is a new construction project, there is no previous history of any discharge at the Facility.

3.0 DISCHARGE PREVENTION

The following measures must be implemented to prevent oil discharges during the handling, use or transfer of oil products at the Facility. Oil-handling employees must receive training in the proper implementation of the measures.

3.1 Facility Layout Diagram and Remote Sites

The Project Location Map for the site overlaid on a USGS topographic map is attached as **Figure 1**. Facility Layout Diagrams are attached for each of the three facilities described above which show the location of storage tanks and general layout. The diagram also indicates the direction of surface water runoff. As required under 40 CFR 112.7(a)(3), the Facility diagrams indicate the location and contents of ASTs, underground storage tanks (USTs), and transfer stations and connecting piping.

3.2 Spill Reporting Procedures

A list of Emergency Contacts is listed in **Appendix C**. A Discharge Notification Form, included as **Appendix D**, will be completed upon immediate detention of a discharge and prior to reporting a spill to the proper authorities. More detailed spill reporting procedures are contained in Section 4.4.

3.3 Potential Discharge Volumes and Direction of Flow

Table 3-1 below contains expected volume, discharge rate, general direction of flow in the event of equipment failure at the Facility and means of secondary containment.

Table 3-1: Potential Discharge Volumes and Direction of Flow				
Potential Event	Maximum volume released (gallons)	Maximum discharge rate	Direction of flow	Secondary Containment
Laydown Yard				
Tank overfill	300	60 gal/min	north	Double-walled Tank
Hose leak during tank truck unloading	300	60 gal/min	north	Double-walled Tank
Dispenser hose rupture	150	30 gal/min	north	Double-walled Tank
Tank rupture	2,000	Gradual to instantaneous	north	Double-walled Tank
Remote Sites				
Leaking turbine gearbox	135	5 gal/min	varies	Turbine enclosure
Leaking turbine hydraulic unit	76	5 gal/min	varies	Turbine enclosure
Substation				
Failure of Main Power Transformer	16,589	60 gal/min	north	Concrete Containment Pit

Releases from oil-filled construction equipment could range from gradual to instantaneous depending upon the type of leak. Direction of flow will depend on the location of the operational equipment with respect to the Remote Sites.

3.4 Containment Drainage

Drainage from the plastic containment tubs surrounding drums at the Laydown Yard are controlled by the impermeable sides of the tubs. The area is drained by IEA by manually activated pumps. The retained rainwater is inspected by IEA prior to draining to ensure that only oil-free water is discharged. A sorbent filter boom will be used to absorb any oils in the containment area. Drainage events are recorded in the log included in **Appendix E**.

3.5 Containment and Diversionary Structures

Methods of secondary containment at this Facility include prefabricated structures or land-based spill response to prevent oil from reaching navigable waters and adjoining shorelines.

Double-Walled Tanks. The ASTs at the laydown yard will be double-walled to meet EPA requirements for secondary containment.

Tubs/Pits. The drum storage and main power transformer may be stored within plastic tubs at the Laydown Yard and concrete pits at the Substation. The bottom and sides are impermeable to restrict the flow of oil outside the containment area. The height of the tub/pit must be a minimum of 12 inches and have sufficient storage to contain 110% of the volume of the single largest container in the pit/tub..

In transfer areas and other parts of the Facility, such as the Remote Sites where a discharge could occur, the following measures shall be implemented:

Drip pans. During fueling operations outside of the secondary containment structures, drip pans may be utilized to contain small leaks from piping/hose connections. Drip pans may also be utilized during field repair and maintenance of oil-filled construction operational equipment.

Sorbent material. Spill cleanup kits that include absorbent material, booms, or other portable barriers shall be located near the oil storage area in the Laydown Yard. Portable spill kits shall be located in lube trucks and mechanics trucks. The spill kits are located within close proximity of the oil product storage and handling areas for rapid deployment in the event of a discharge outside the containment area or at the turbine sites.

3.6 Practicability of Secondary Containment

It has been determined that secondary containment is practicable at this facility at the laydown yard, remote sites and the substation.

3.7 Inspections, Tests, and Records

Visual inspections of tanks and containment areas are conducted monthly. Inspection of the outside of the container for signs of deterioration, discharges, or accumulation of oil inside containment areas is conducted. The monthly inspection checklist is provided in **Appendix G**. The monthly inspections cover the following key elements:

- Observing the exterior of aboveground storage tanks, pipes, and other equipment for signs of deterioration, leaks, corrosion, and thinning;
- Observing the exterior of portable containers for signs of deterioration or leaks;
- Observing the tank fill and discharge pipes and hoses for signs of poor connection that could cause a discharge, and tank vent for obstructions and proper operation;
- Verifying the proper functioning of overfill prevention systems; and
- Checking the inventory of discharge response equipment and restocking as needed.

Each aboveground tank will be tested for integrity on a regular schedule and whenever material repairs are made. The regulations require visual inspections combined with another testing technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of non-destructive shell testing. For small non-regulated aboveground

tanks, such as those in use at the Facility, the testing can be substituted by a more detailed visual inspection in accordance with the Steel Tank Institute (STI) *Standard for the Inspection of Aboveground Storage Tanks*, SP-001, latest version. This inspection will be performed annually.

Fire extinguishers will be visually inspected monthly and certified annually. Level gauge accuracy will be verified by a comparison to a stick test at least annually.

All problems regarding tanks, piping, containment, or response equipment will be immediately reported to the SPCC Emergency Coordinator listed in Section 1.3. Visible oil leaks from tank walls, piping, or other components must be repaired as soon as possible to prevent a larger spill or discharge to navigable waters or adjoining shorelines. Pooled oil shall be removed immediately upon discovery.

3.8 Personnel, Training, and Discharge Prevention Procedures

The SPCC Emergency Coordinator is responsible for oil discharge prevention, control, and response preparedness activities at this Facility.

Oil-handling personnel will be trained in the operation and maintenance of oil pollution prevention equipment, discharge procedure protocols, applicable pollution control laws, rules and regulations, general facility operations, and the content of this SPCC Plan. Any new Facility personnel with oil-handling responsibilities shall be provided with this same training prior to being involved in any oil operation associated with the Project.

Annual discharge prevention briefings shall be held by the SPCC Emergency Coordinator for all Facility personnel involved in oil operations. The briefings are aimed at ensuring adequate understanding of the SPCC Plan. The briefing will highlight and describe known discharge events or failures, malfunctioning components and any recently developed precautionary measures.

Records of the briefing and discharge prevention training shall be kept on the form contained in **Appendix H** and maintained with this SPCC Plan for a period of three years from the briefing/training date.

3.9 Security

Fencing and lighting will be provided at the Facility with full time Facility personnel at the Laydown Yard during the day in addition to on-site security patrols.

Drain valves shall be locked in the closed position to prevent unauthorized opening at all times. Fill caps on the tanks are locked at all times when not in operation. The fuel dispenser is chained

and locked at night so that it cannot be removed when the Facility is not attended. With the dispenser locked in place, the fuel dispensing pump shall be turned off.

3.10 Loading/Unloading

There is no dedicated loading/unloading rack at the Facility during the construction phase of the Project. Tank truck loading/unloading procedures conform to regulations established by the U.S. Department of Transportation. IEA will ensure that vendors understand the site layout, that they know the protocols for unloading oil products, and that they have the necessary equipment to respond to a discharge from the vehicle or fuel delivery hose. This applies to loading/unloading at the Laydown Yard and Remote Sites.

Vehicle filling and unloading operations at the Laydown Yard and Remote Sites shall be performed by Facility personnel trained in proper discharge prevention procedures. The truck driver or Facility personnel shall stay with and monitor the vehicle at all times while fuel is being transferred. Transfer operations shall be performed according to the procedures listed in **Table 3-2** on the following page.

Table 3-2: Fuel Transfer Procedures		
Stage		Tasks
Prior to loading/unloading		Visually check hoses for leaks and wet spots.
		Verify the sufficient volume is available in the storage tank or truck
		Lock, in the closed position, all drainage valves of the secondary containment structure
		Secure the tank vehicle/set parking brakes
		Verify proper alignment of valves and proper functioning of the pumping system.
		If filling a tank truck, inspect the lowest drain and all outlets.
		Establish adequate bonding/grounding prior to connecting to the bulk fuel transfer point.
		Turn off cell phone.
		No smoking.
During loading/unloading		Driver must stay with the vehicle at all times during loading/unloading.
		Periodically inspect all systems, hoses and connections.
		When loading, keep internal and external valves on the receiving tank open along with the pressure relief valves.
		When making a connection, shut off the vehicle engine. When transferring flammable liquid, shut off the engine unless it is used to operate a pump.
		Maintain communication with the pumping and receiving stations.
		Monitor the liquid level in the receiving tank to prevent overflow.
		Watch for any leaks or spills. Any small leaks or spills should be immediately stopped and then absorbed and disposed of properly.
After loading/unloading		Make sure the transfer operation is complete.
		Close all tank and loading valves before disconnecting.
		Secure all hatches.
		Disconnect all grounding/bonding wires from the bulk fuel transfer point.
		Make sure the hoses are drained to remove remaining oil before moving them away from the connection. Use a drip pan.
		Cap the end of the hose and other connecting devices before moving them to prevent uncontrolled leakage.
		Inspect the lowest drain and other outlets on tank truck prior to departure. If necessary, tighten, adjust, or replace caps, valves, or other equipment to prevent oil leaking while in transit.
		Inspect the loading/unloading point and tank to verify that no leaks have occurred or that any leaked or spilled material has been cleaned up and disposed of properly.

3.11 Fracture Evaluation

There are no field constructed tanks at the Facility.

3.12 Conformance with State and Local Applicable Requirements

Storm water runoff from the Timber Road III Wind Farm is generally discharged to North Creek, South Creek, Wildcat Creek and Flatrock Creek drainage areas as permitted under the Ohio EPA Construction Stormwater General Permit (OHC000003). The waterways and drainage flows are shown generally in **Figure 1**.

Any size release of oil that is detrimental to the quality of waters of the state (causes a film or sheen) or any size release of oil that is discharged onto land in excess of 25 gallons also requires immediate notification to the Ohio EPA (614-224-0946). If the release is not contained or threatens the health or safety of the local population, the Local Emergency Planning Committee (LEPC) within the county of the release must be notified first by dialing 911.

Verbal notification to the Ohio EPA (614-224-0946), fire department and LEPC (911) shall be made within 30 minutes of knowledge of the release, unless notification within that timeframe is impractical due to uncertain circumstances.

A written follow-up emergency notice must also be submitted within 30 days to the Ohio EPA Emergency Response Section and the LEPC of the planning district in which the release or discharge occurred. Written follow-ups to the Ohio EPA can be mailed to the following address:

Ohio EPA, DERR-ER
Lazarus Government Center
50 West Town Street
PO Box 1049
Columbus, OH 43216-1049

4.0 DISCHARGE RESPONSE

This section describes the response and cleanup procedures in the event of an oil discharge. The uncontrolled discharge of oil to groundwater, surface water, or soil is prohibited by state and/or federal laws. Immediate action must be taken to control, contain, and recover discharged product.

In general, the following steps shall be taken:

- Eliminate potential spark sources;

- If possible and safe to do so, identify and shut down the source of discharge to stop the flow;
- Contain the discharge with containers, sorbents, berms, trenches, sandbags, or other material;
- Contact the SPCC Emergency Coordinator or his/her alternate;
- Contact regulatory authorities and the response organization and report the release; and
- Collect and dispose of recovered products according to regulation.

For purposes of establishing appropriate response procedures, this SPCC Plan classifies discharges as either “minor” or “major”, depending on the volume and characteristics of the material released.

A list of Emergency Contacts is provided in **Appendix C**. This list identifies personnel to be contacted in case of emergency and will be posted on the information board in the laydown yard.

4.1 Response to a Minor Discharge

A “minor” discharge is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

- The quantity of product discharged is small (may involve less than 5 gallons of oil);
- Discharged material is easily stopped and controlled at the time of discharge;
- Discharge is localized near the source;
- Discharged material is not likely to reach water, groundwater or field drains;
- There is little risk to human health and safety; and
- There is little risk of fire or explosion.

Minor discharges can usually be cleaned by Facility personnel. The following procedures apply:

- Immediately notify the SPCC Emergency Coordinator;
- Under direction of the SPCC Emergency Coordinator, contain the discharge with discharge response materials and equipment. Place discharge debris in properly labeled waste containers; and
- The SPCC Emergency Coordinator will complete the discharge notification form in **Appendix D** and attach a copy to this SPCC Plan.

4.2 Response to a Major Discharge

A “major” discharge is defined as one that cannot be safely controlled or cleaned up by Facility personnel, such as when:

- The discharge is large enough to spread beyond the immediate discharge area;

- The discharged material enters water; groundwater or sewer drains
- The discharge requires special equipment or training to clean up;
- The discharge material poses a hazard to human health or safety; or
- There is a danger of fire or explosion.

In the event of a major discharge, the following guidelines apply:

- Safety of personnel is the primary concern. No countermeasures that risk the health or safety of personnel should be undertaken;
- If the SPCC Emergency Coordinator is not present at the Facility, the senior on-site person shall notify the SPCC Emergency Coordinator of the discharge and has the authority to initiate notification and response;
- No smoking, open flames, cell phones, or other spark inducing equipment is permitted in the area of a flammable material spill;
- Facility personnel should stop the source of the leak or spill if possible by closing a valve, turning off a pump, sealing a hole, etc. If Facility personnel feel comfortable containing the spill, use absorbent pads, booms, sand and/or speedi-dri materials to stop the spread of the spill. Contaminated soil should be placed on an impermeable liner for containment;
- Emergency medical treatment and first aid shall be administered by personnel certified in first aid/CPR. The SPCC Emergency Coordinator (or senior on-site person) must call for medical assistance if workers are injured;
- Establish fire prevention measures in the vicinity of the spill. Divert traffic (vehicular and pedestrian) from the area. The SPCC Emergency Coordinator (or senior on-site person) must call the local Fire Department or Police Department;
- If Facility personnel are unsure of the hazards involved or the amount of the spill is too large or a release to navigable waters or adjoining shorelines is threatened, the SPCC Emergency Coordinator (or senior on-site person) shall call for outside assistance from a spill response/cleanup contractor;
- The SPCC Emergency Coordinator (or senior on-site person) will immediately call the National Response Center (800-424-8802), Ohio EPA (614-224-0946) and the Local Emergency Planning Committee (911);
- The SPCC Emergency Coordinator (or senior on-site person) will complete the discharge notification form in **Appendix D** and attach a copy to this SPCC Plan; and
- The SPCC Emergency Coordinator (or senior on-site person) will coordinate cleanup and contract cleanup contractor as necessary.

If the SPCC Emergency Coordinator is not available at the time of the discharge, then the next highest person in seniority assumes responsibility for coordinating response activities.

4.3 Waste Disposal

Waste resulting from a minor discharge response will be contained in impervious bags, drums, or buckets. The SPCC Emergency Coordinator will characterize the waste for proper disposal and ensure it is removed from the Facility by a licensed waste hauler. The designated spill contractor for the site is Safety Kleen (260-484-8034)

Wastes resulting from a major discharge response will be removed and disposed of by a licensed cleanup contractor. Waste materials will be disposed of in accordance with federal and state regulations.

4.4 Discharge Notification

Any size discharge that affects or threatens to affect navigable waters (i.e., one that creates an oil film, sheen, emulsion, or sludge upon navigable waters or adjoining shorelines) must be reported immediately to the National Response Center (1-800-424-8802). The National Response Center is staffed 24 hours a day.

Any size release of oil that is detrimental to the quality of waters of the state (causes a film or sheen) or any size release of oil that is discharged onto land in excess of 25 gallons also requires immediate notification to the Ohio EPA (614-224-0946). If the release is not contained or threatens the health or safety of the local population, the Local Emergency Planning Committee (LEPC) within the county of the release must be notified first by dialing 911.

Verbal notification to the Ohio EPA (614-224-0946), fire department and LEPC (911) shall be made within 30 minutes of knowledge of the release, unless notification within that timeframe is impractical due to uncertain circumstances.

A written follow-up emergency notice must also be submitted within 30 days to the Ohio EPA Emergency Response Section and the LEPC of the planning district in which the release or discharge occurred. Written follow-ups to the Ohio EPA can be mailed to the following address:

Ohio EPA, DERR-ER
Lazarus Government Center
50 West Town Street
PO Box 1049
Columbus, OH 43216-1049

In addition, 40 CFR 112.4 requires that information be submitted to the United States Environmental Protection Agency (EPA) Regional Administrator and the appropriate state agency in charge of oil pollution control activities (see contact information in **Appendix C**) whenever the facility discharges more than 1,000 gallons of oil to a navigable water in a single

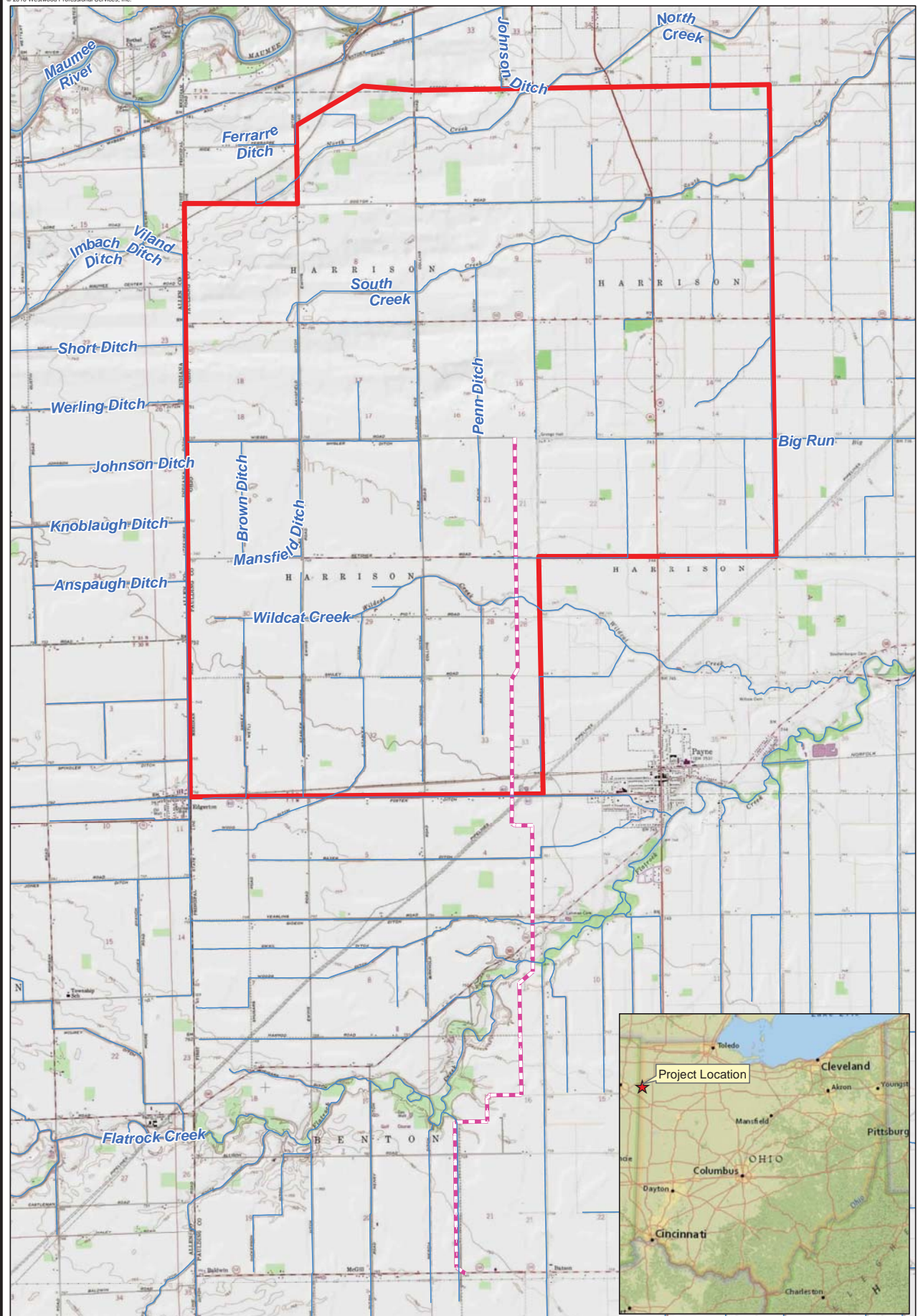
event, or discharges more than 42 gallons of oil to navigable waters in each of two discharge incidents within a 12-month period.

Contact information for reporting the discharge to the appropriate authorities is listed in **Appendix C** and is also posted at the information board in the Laydown Yard.

A summary sheet is included in **Appendix D** to facilitate the reporting. The person reporting the discharge will provide the following information:

- Name, location, organization, and telephone number;
- Name and address of the party responsible for the incident;
- Date and time of the incident;
- Source and cause of the release or discharge;
- Type of material(s) released or discharged;
- Quantity of materials released or discharged;
- Danger or threat posed by the release or discharge;
- Number and type of injuries, if any;
- Media affected or threatened by the discharge (i.e., water, land, air);
- Weather conditions at the incident location; and
- Any other information that may help emergency personnel respond to the incident.

FIGURES



Data Source(s): Westwood (2016).

Legend




-  NHD Flowline
-  Proposed Transmission Line
-  Project Area

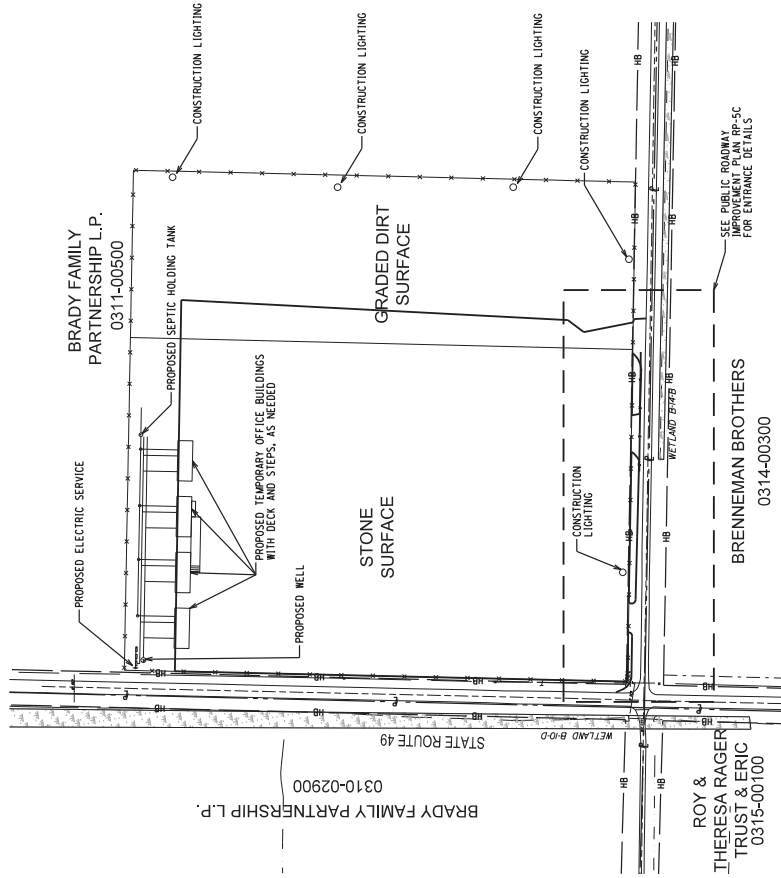
Figure 1

Timber Road III

Paulding County, OH

USGS Topographic Map

April 12, 2016



END OF ROAD SITE LAYOUT TYPE "A"
NOT TO SCALE

END OF ROAD SITE LAYOUT TYPE "B"
NOT TO SCALE

END OF ROAD SITE LAYOUT TYPE "C"
NOT TO SCALE

INTERMEDIATE SITE LAYOUT TYPE "D"
NOT TO SCALE

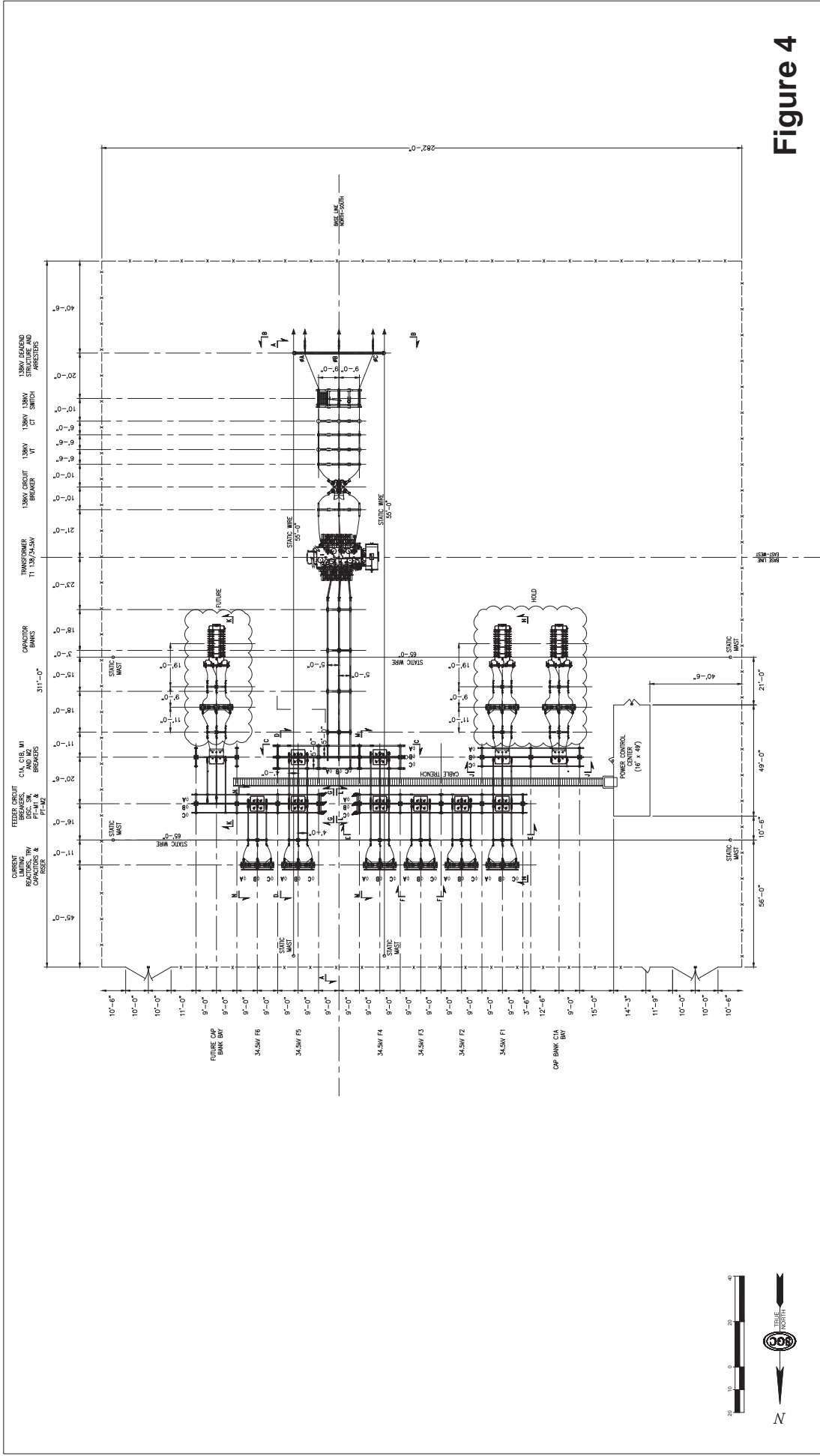




Figure 4

 SGC Engineering, LLC <small>a part of Senergy</small>	 TIMBER ROAD <small>WIND FARM</small>	PRELIMINARY NOT FOR CONSTRUCTION				NO. 1 A B	REVISED: ISSUED FOR 30% REVIEW ISSUED FOR 75% REVIEW	APPD: DATE: MKK 09/24/15 MKK 12/07/15	TITLE: GENERAL ARRANGEMENT 138/34.5KV PROJECT SUBSTATION	SGC PROJECT NUMBER: 130001 DRAWING NUMBER: 1300-05-1001 REVISION: A	SHEET NUMBER: 1 OF 1	
		DATE: SEPTEMBER 24, 2015	SCALE: 1"=20'	DRAWN: TDD	CHECKED: NOT							APPROVED: MKK
		ONLY VALID WITH DRAWING NUMBER										

APPENDICES

Appendix A
Substantial Harm Determination

Facility Name: Timber Road III Wind Farm
Facility Address: 5104 Road 60
Payne, OH 45880

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
Yes ____ No x
2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
Yes ____ No x
3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
Yes ____ No x
4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?
Yes ____ No x
5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
Yes ____ No x

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

_____ Signature	Project Engineer, IEA _____ Title
Ben Clevinger _____ Name (type or print)	_____ Date

Appendix B

Plan Review Log

Five Year Review Log (Not anticipated to be needed)

I have completed a review and evaluation of the SPCC Plan for this Facility, and will/will not amend this SPCC Plan as a result.

Review Date	SPCC Plan Amendment		Name and signature of person authorized to review this SPCC Plan
	Will Amend	Will Not Amend	

Technical Amendment Log

Any technical amendments to this SPCC Plan will be re-certified by a licensed Professional Engineer.

[illegible]

Appendix C

Emergency Contacts

Person responsible for spill prevention: Ben Clevinger, Project Engineer, IEA

EMERGENCY TELEPHONE NUMBERS

Facility:

Ben Clevinger, Project Engineer, IEA	812-281-1381
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[IEA Alternate Contact TBD]

[Phone Number TBD]

Wayne Beck, Paulding Wind III, LLC

[Phone Number TBD]

Designated Spill Contractor: Safety Kleen

260-484-8034

Local Emergency Response:

Paulding County 911	911
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Paulding County Sheriff	419-399-3791
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Paulding Fire Department	419-399-5923
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Notification:

National Response Center	800-424-8802 (24 hours/day)
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U.S. Environmental Protection Agency, Region 5	312-886-7836
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Ohio EPA Spill Reporting	614-224-0946
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Ohio EPA, Northwest District Office	419-352-8461
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Appendix D

Discharge Notification Form

In the event of a discharge to navigable waters or adjoining shorelines, the following information will be provided to the National Response Center. See also the notification information provided in Section 4.4 of the SPCC Plan.

Facility Name:	Timber Road III Wind Farm		
Address:	5104 Road 60 Payne, OH 45880		
Telephone:	[TBD]		
Operator:	IEA Renewable Energy 3900 E. White Ave Clinton, IN 47842		
Primary Contact:	Ben Clevinger, Project Engineer, IEA #812-281-1381		
Discharge Date:		Discharge Time:	
Weather Conditions and Temperature:			
Name of reporting individual:			
Type of material:			
Quantity released:			
Estimate quantity released to navigable waters:			
Cause of Discharge:			
Action taken to stop, remove and mitigate the effects of the discharge:			
Media affected:	Soil Water (specify) Other (specify)		
Damages or injuries:	No Yes	Type of Injury:	
Organizations and individuals contacted:	Fire/Police/Ambulance #911 Time:		
	Paulding Fire Dept #419 399-5923 Time:		
	National Response Center #800-424-8802 Time:		
	Ohio EPA Spill Reporting #614-224-0946 Time:		
	Facility SPCC Coordinator #812-281-1381 Time:		
	Cleanup contractor (Safety Kleen) #260-484-8034 Time:		

Appendix E

This record will be completed when rainwater from secondary containment is drained from or pumped out of secondary containment. The bypass valve will normally be sealed in a closed position. It will be opened and resealed following drainage under responsible supervision.

Rainwater is not to be drained if oil or an oily sheen is present.

[illegible]

Appendix F

Calculation of Secondary Containment Capacity

Secondary containment volume calculations will be determined upon completion of the site inspection. All secondary containment shall be sized to hold a minimum of 110% of the volume of the single largest container within the containment area.

Appendix G

Monthly Facility Inspection Checklist

The following checklist is to be used for monthly inspections. Completed checklists must be signed by the inspector and maintained at the facility, with the SPCC Plan, for at least three years.

Any item that receives a “yes” answer must be described and addressed immediately.

	Y	N	Description & Comments
<i>Storage Tanks</i>			
Tank surfaces show signs of leakage			
Tanks are damaged, rusted, or deteriorated			
Bolts, rivets, or seams are damaged			
Tank supports are deteriorated or buckled			
Level gauges are inoperable			
Vents are obstructed			
<i>Containment Areas</i>			
Secondary containment is damaged or stained			
Standing water in containment			
Drainage valve is open or not secure			
Evidence of oil release from tank			
<i>Transformers</i>			
Transformer surfaces show signs of leakage			
Transformer is damaged, rusted or deteriorated			
Bolts, rivets, or seams are damaged			
Transformer supports are deteriorated or buckled			
Transformer foundations have eroded or settled			
<i>Safety</i>			
Safety equipment missing or inoperable			
Spill response equipment used and not replaced			
Fire extinguisher not present / operational			
Fuel tank not grounded			

Date: _____ Signature: _____

Appendix H

Discharge Prevention Briefing and Training Log

Annual discharge prevention briefings will be held to ensure adequate understanding of the SPCC Plan. The briefings will also highlight and describe known discharge events or failures, malfunctioning components and any recently developed precautionary measures. Oil-handling personnel shall be trained in the operation and maintenance of oil pollution prevention equipment, discharge procedure protocols, applicable pollution control laws, rules and regulations, general facility operations, and the content of the SPCC Plan.

[illegible]

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

6/1/2016 3:44:38 PM

in

Case No(s). 15-1737-EL-BTX

Summary: Correspondence Condition 27 compliance electronically filed by Mr. Ryan D. Elliott on behalf of Paulding Wind Farm III LLC