Case No. 21-182-EL-BGA

Third Amendment Application to the Ohio Power Siting Board for a Certificate of Environmental Compatibility and Public Need



Submitted by:

Guernsey Power Station, LLC

March 2021



Bricker & Eckler LLP 100 South Third Street Columbus, OH 43215 Office: 614.227.2300 Fax: 614.227.2390 Dylan F. Borchers Direct Dial: 4914 dborchers@bricker.com www.bricker.com info@bricker.com

March 15, 2021

Via Electronic Filing

Ms. Tanowa Troupe Administration/Docketing Ohio Power Siting Board 180 East Broad Street, 11<sup>th</sup> Floor Columbus, Ohio 43215-3793

**Re:** Guernsey Power Station LLC

Case No. 21-182-EL-BGA

Dear Ms. Troupe:

Enclosed for filing in the above-referenced case is a copy of the Third Amendment Application of Guernsey Power Station LLC for its electric generating facility, Guernsey Power Station, in Valley Township, Guernsey County, Ohio. The Third Amendment requests authorization of adjoining parcels now owned by the Applicant for construction parking, material storage and trailer uses. Pursuant to Ohio Administrative Code 4906-2-04(A)(3), the Applicant makes the following declarations:

Name of Applicant: Guernsey Power Station LLC

whose authorized representative is

Mitchell Garber

Caithness Energy, LLC 565 5<sup>th</sup> Avenue, 29<sup>th</sup> Floor New York, NY 10017 Telephone: (614) 227-4914 Facsimile: (614) 227-2390

E-Mail: dborchers@bricker.com

Name/Location of Proposed Facility:

Guernsey Power Station LLC

Valley Township, Guernsey County, Ohio

# Bricker & Eckler ATTORNEYS AT LAW

Guernsey Power Station LLC Case No. 21-182-EL-BGA March 15, 2021 Page 2

# **Authorized Representative**

**Legal:** Dylan F. Borchers

Bricker & Eckler LLP 100 South Third Street Columbus, OH 43215

Telephone: (614) 227-4914 Facsimile: (614) 227-2390

E-Mail: <u>dborchers@bricker.com</u>

**Notarized Statement:** See Attached Affidavit of Mitchell Garber,

on behalf of Guernsey Power Station, LLC

Sincerely on behalf of

**GUERNSEY POWER STATION LLC** 

Dylan F. Borchers

Enclosure

### BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Third Amendment of	)
Guernsey Power Station LLC to its Certificate	)
of Environmental Compatibility and Public	) Case No. 21-182-EL-BGA
Need for an Electric Generating Facility in	)
Guernsey County, Ohio	)

#### AFFIDAVIT OF MITCHELL GARBER

STATE OF NEW YORK

: SS.

COUNTY OF NEW YORK

I. Mitchell Garber, being duly sworn and cautioned, state that I am over 18 years of age and competent to testify to the matters stated in this affidavit and further state the following based upon my personal knowledge:

- 1. I am Senior Vice President. Engineering. Construction and Project Management of Guernsey Power Station LLC ("GPS"). The Guernsey Power Station is a combined cycle power generation facility, is being developed by GPS. I am the primary individual in charge of the construction of the facility for GPS.
- I have reviewed the Third Amendment Application of Guernsey Power Station LLC to the Ohio Power Siting Board for the Guernsey Power Station.
- 3. To the best of my knowledge, information, and belief, the information and materials contained in the above-referenced Amendment are true and accurate.
- 4. To the best of my knowledge, information, and belief, the above-referenced Amendment is complete.

Mitchell Garber

Sworn to before and signed in my presence this \2 day of March 2021.

GAIL M. CONBOY
Notary Public, State of New York
No. 4964579
Qualified in New York County
Commission Expires 4/2

Notary Public

[SEAL]

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# BEFORE THE OHIO POWER SITING BOARD

# Third Amendment Application of Guernsey Power Station LLC Guernsey Power Station

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- Figure 02-2 Additional Temporary Work Area Northern Aerial View
- Figure 02-3 Additional Temporary Work Area Northern Proposed Use
- Figure 02-4 Additional Temporary Work Area Southern Aerial View
- Figure 02-5 Additional Temporary Work Area Southern Proposed Use

#### Section 4906-4-03 Project Description and Schedule

• Updated Figure 03-2 Proposed Facility and Vicinity

#### Section 4906-4-04 Project Area Selection and Site Design

No updated figures

#### Section 4906-4-05 Electric Grid Interconnection

• No updated figures

# Section 4906-4-06 Economic Impact and Public Interaction

No figures

# Section 4906-4-07 Air, Water, Solid Waste, and Aviation Regulations

No updated figures

# Section 4906-4-08 Health and Safety, Land Use, and Ecological Information

- Updated Figure 08-5 FEMA Flood Zones
- Updated Figure 08-6 Soils
- Updated Figure 08-7 Natural Resource Characteristics of the Site and Surroundings
- Updated Figure 08-10B Surrounding Land Use Structures

# **ACROYNYMS AND ABBREVIATIONS**

the Applicant	Guernsey Power Station LLC	
тетричан	the application provided to the Ohio Power Siting Board to support	
	a request for a Certificate of Environmental Compatibility and Public	
the Application	1 7	
the Application	Need to Construct an Electric Generation Facility	
	Certificate of Environmental Compatibility and Public Need to	
the Certificate	Construct an Electric Generation Facility	
the Facility	the Guernsey Power Station	
	the approximately 118-acre location proposed for the Guernsey	
the Facility Site	Power Station in Valley Township, Guernsey County	
•	the first amendment to the original Ohio Power Siting Board	
the First Amendment	Application for the Guernsey Power Station	
GPS	Guernsey Power Station LLC	
MW	megawatts	
OPSB	Ohio Power Siting Board	
the pandemic	the COVID-19 pandemic	
PJM	the regional electric transmission independent system operator	
the Project Area	The 133-acre property consisting of the Guernsey Power Station and	
	temporary work areas	
the Second Amendment	the second amendment to the original Ohio Power Siting Board	
	Application for the Guernsey Power Station	
the Third Amendment	the third amendment to the original Ohio Power Siting Board	
	Application for the Guernsey Power Station	

4906-4-02 Project Summary and Applicant Information

As discussed in Section 4906-13-01 of the original Application for Certificate of

Environmental Compatibility and Public Need (the Application) in Case Number

16-2443-EL-BGN to the Ohio Power Siting Board (OPSB), Guernsey Power Station LLC (GPS

or the Applicant) plans to own and operate the Guernsey Power Station (the Facility). The

Application reflected a Facility net planned generation of 1,650 megawatts (MW), but consistent

with the original PJM<sup>1</sup> interconnection application, the Certificate of Environmental Compatibility

and Public Need (the Certificate) reflected authorization of a Facility net generation of 1,100 MW.

On January 11, 2018, GPS filed an amendment (Case Number 18-0090-EL-BGA; the First

Amendment) to authorize increase of the Facility's electric generating output to 1,650 MW. A

Certificate was issued granting this increase on March 15, 2018. GPS filed a further amendment

(Case No. 20-0033-EL-BGA; the Second Amendment) on January 8, 2020 to authorize and

additional 225 MW of electric generating output for a total of 1,875 MW.

Due to the need for increased staffing levels based on the current stage of the Project while

maintaining social distancing requirements associated with constructing the Facility during the

COVID-19 pandemic (the pandemic), this amendment under Case 21-182-EL-BGA (the Third

Amendment) requests authorization of adjoining parcels now owned by the Applicant for

construction parking, material storage and trailer uses. Aspects of the Facility itself remain

unchanged prior those reflected in prior authorizations.

-

<sup>1</sup> PJM is the regional independent transmission organization that coordinates the movement of wholesale electricity in all or part of 13 states (including Ohio) and the District of Columbia. Its name results from its origin serving Pennsylvania (P), New Jersey (J), and Maryland (M).

Section 4906-04-02 Guernsey Power Station Case No. 21-182-EL-BGA

1

(A) SUMMARY OF THE PROPOSED PROJECT

No change from the prior filings.

(1) General Purpose of the Facility

No change from the prior filings.

(2) Facility Description

The Application addressed the Facility, an 1,875-MW natural gas-fired combined cycle

electric generating facility to be developed, built, owned, and operated by GPS. Although the

initial Certificate authorized the initial 1,100 MW, approval of the First Amendment and Second

Amendment authorized the full 1,850 MW. The Facility is proposed on a 118-acre property that

is located entirely within Valley Township, Guernsey County, Ohio (the Facility Site). No changes

to major components of the Facility have occurred since the Application, First Amendment, and

Second Amendment.

This Third Amendment solely addresses the temporary use of two additional parcels

adjacent to existing Facility work areas that are now owned by the Applicant. No change to the

Facility is planned. The use of these additional temporary work spaces will allow for compliance

with pandemic requirements while construction is ongoing, protecting health and safety with no

material change in environmental effect.

The first additional temporary work area is an approximately 1-acre property located north

of Seneca Lane that previously consisted of a home and residential lawn surrounded by

construction laydown area to the north, east, and west, and by the Facility to the south on the

opposite side of Seneca Lane (Updated Figure 02-1). Following acquisition of this parcel in June

2020, GPS installed security fencing and completed demolition of the existing vacant residential

structures so they would not pose a hazard; current conditions are reflected in Figure 02-2. During

2

Section 4906-04-02 Guernsey Power Station the balance of the construction effort, it is proposed that this area be used to house construction

trailers as well as for parking and/or storage of materials (as shown on Figure 02-3). At the

completion of construction, temporary features will be removed from this parcel and it will either

be stabilized and seeded to revert to open vegetated area or be conveyed to others for agricultural

use.

The second temporary work area is an approximately 1-acre parcel located south of Seneca

Lane and surrounded to the east, west, and south by Facility-related property (Updated

Figure 02-1). This property was the former location of a residential structure, lawn, and informal

automobile repair facility. Upon acquiring the property in November 2020, GPS has removed

debris from the property, and is in the process of demolishing the vacant structure for safety

reasons; representative conditions are show on Figure 02-4, with demolition work expected to be

completed in early March 2021. During the balance of the construction effort, it is proposed that

this parcel be used to house construction trailers as well as for parking and/or storage of materials

(as shown on Figure 02-5). At the completion of construction, temporary features will be removed

from this parcel and it will be stabilized and seeded to remain as an open vegetated area.

(3) Site Suitability

No change from the prior filings.

(4) Project Schedule

The Facility is currently under construction, with a plan for commencement of commercial

operation by the winter of 2022/23.

(B) ADDITIONAL INFORMATION

(1) Description of Future Plans/Plans for Future Additions

No change from the prior filings.

Section 4906-04-02 Guernsey Power Station

Case No. 21-182-EL-BGA

3

# (2) Applicant Information

# 4906-4-03 Project Description and Schedule

### (A) DETAILED DESCRIPTION OF THE PROJECT AREA

# (1) Project Map

No change from the prior filings.

#### (2) Project Area

No change from the prior filings, with the exception of including temporary uses during construction on two parcels adjacent to and in close proximity to the existing Facility Site.

# (B) PROPOSED FACILITY DESCRIPTION

No change from the prior filings.

# (1) Project Details

No change from the prior filings.

#### (a) Generation Units

No change from the prior filings.

# (b) Description of Wind Turbine Equipment

No change from the prior filings.

#### (c) Fuel Quantity and Quality

No change from the prior filings.

#### (d) Pollutant Emissions

No change from the prior filings.

# (e) Water Volume Requirement

# (2) Description of Construction Method and Project Components

# (a) Generation Equipment

No change from the prior filings.

# (b) Storage Facilities

No change from the prior filings.

# (c) Processing Facilities

No change from the prior filings.

# (d) Water Supply and Discharge

No change from the prior filings.

#### (e) Transmission Facilities

No change from the prior filings.

#### (f) On-Site Electric Components

No change from the prior filings.

# (g) Ancillary Facilities

No change from the prior filings.

# (h) Meteorological Towers

No change from the prior filings.

#### (i) Transportation Facilities

No change from the prior filings.

# (j) Laydown and Parking Areas

No change from the prior filings, other than the addition of the two parcels to allow for separation of workers consistent with pandemic safety requirements.

#### (k) Security

No change from the prior filings, other than encompassing the two additional parcels into ongoing temporary security measures in place during the construction effort.

#### (l) Other Installations

No change from the prior filings.

# (3) Description of New Transmission Facilities

#### (a) Electric Transmission Line

No change from the prior filings.

#### (b) Natural Gas Pipelines

No change from the prior filings.

# (4) Map of Project Site

Updated Figure 03-2 illustrates the Facility on an aerial photograph, showing the two additional temporary work areas, as well as surrounding roads and other major features of the Facility.

#### (C) DETAILED PROJECT SCHEDULE

## (1) Schedule

The Facility is currently under construction, with a projected commercial operation date in winter of 2022/23.

# (2) Construction Sequence

No change from the prior filings.

# (3) Delays

# 4906-4-04 Project Area Selection and Site Design

#### (A) SITE SELECTION PROCESS

# (1) Description of Study Area

No change from the prior filings.

# (2) Maps of Evaluated Alternate Sites

No change from the prior filings.

# (3) Siting Criteria

No change from the prior filings.

# (4) Process for Identifying the Proposed Site

No change from the prior filings.

# (5) Factors in Selecting the Proposed Site

No change from the prior filings.

# (B) FACILITY LAYOUT DESIGN

No change from the prior filings.

# (1) Constraints Map

No change from the prior filings.

# (2) Facility Layout and Alternatives Considered

No change from the prior filings.

# (3) Comments Received

# 4906-4-05 Electric Grid Interconnection

# (A) INTERCONNECTION TO THE REGIONAL ELECTRIC POWER SYSTEM

No change from the prior filings.

# (B) INTERCONNECTION REQUEST

# (1) Feasibility Study

No change from the prior filings.

# (2) System Impact Study

# 4906-4-06 Economic Impact and Public Interaction

#### (A) OWNERSHIP

No change from the prior filings.

# (B) CAPITAL AND INTANGIBLE COSTS

# (1) Estimated Capital and Intangible Costs

No change from the prior filings.

# (2) Capital Cost Comparison

No change from the prior filings.

#### (3) Present Worth and Annualized Capital Costs Comparison to Alternatives

No change from the prior filings.

# (C) OPERATION AND MAINTENANCE EXPENSES

#### (1) Estimated Annual Operation and Maintenance Expenses

No change from the prior filings.

#### (2) Operation and Maintenance Expenses Comparison

No change from the prior filings.

#### (3) Present Worth and Annualized O&M Expenses Comparison to Alternatives

No change from the prior filings.

#### (D) COST OF DELAYS

No change from the prior filings.

# (E) ECONOMIC IMPACT

# (1) Annual Total Present Worth of Construction and Operation Payroll

No change from the prior filings.

#### (2) Construction and Operation Employment

# (3) Increase in Local Revenue

No change from the prior filings.

# (4) Economic Impact on Local Commercial and Industrial Activities

No change from the prior filings.

# (F) RESPONSIBILITY TO THE PUBLIC

# (1) Public Information Program

No change from the prior filings.

# (2) Liability Compensation Plans

No change from the prior filings.

# (3) Impact to Surrounding Infrastructure

No change from the prior filings.

# (4) Transportation Permits

No change from the prior filings.

# (5) Plan for Decommissioning

# 4906-4-07 Air, Water, Solid Waste, and Aviation Regulations

### (A) COMPLIANCE WITH APPLICABLE REGULATIONS

No change from the prior filings.

# (B) AIR QUALITY

#### (1) Preconstruction

#### (a) Ambient Air Quality

No change from the prior filings.

# (b) Pollution Control Equipment

No change from the prior filings.

#### (c) State and Federal Performance Standards

No change from the prior filings.

#### (d) Required Permits

No change from the prior filings.

# (e) Air Monitoring Stations and Major Source Mapping

No change from the prior filings.

#### (f) Compliance Plans

No change from the prior filings.

# (2) Construction

No change from the prior filings.

#### (3) Operation

#### (a) Description of Air Monitoring Plans

#### (b) Estimated Air Concentration Isopleths

No change from the prior filings.

# (c) Potential Failure of Air Pollution Control Equipment

No change from the prior filings.

# (C) WATER QUALITY

No change from the prior filings.

#### (1) Preconstruction

# (a) Required Permits

No change from the prior filings.

#### (b) Location of Survey Data Sources

No change from the prior filings.

#### (c) Description of Data Sampling Stations and Reporting Procedures

No change from the prior filings.

# (d) Water Quality of Receiving Stream

No change from the prior filings.

# (e) Water Discharge Permit Information

No change from the prior filings.

#### (2) Construction

# (a) Location of Water Monitoring and Gauging Stations

No change from the prior filings.

# (b) Aquatic Discharges

#### (c) Mitigation Plans

No change from the prior filings; as is the case for the balance of the temporary work areas, appropriate Best Management Practices will be identified, implemented, and monitored in accordance with a Stormwater Pollution Prevention Plan.

#### (d) Changes in Flow Patterns and Erosion

No change from the prior filings.

# (e) Description of Equipment for Control of Effluents in Receiving Waters

No change from the prior filings.

#### (3) Operation

#### (a) Location of Monitoring Equipment

No change from the prior filings.

#### (b) Water Pollution Control Equipment and Treatment Process

No change from the prior filings.

# (c) Issuance of Required Permits

No change from the prior filings.

# (d) Quantitative Flow Diagram

No change from the prior filings.

#### (e) Water Conservation

No change from the prior filings.

# (D) SOLID WASTE

#### (1) Preconstruction

#### (a) Debris and Solid Waste

#### (b) Waste Management Plan

No change from the prior filings.

# (2) Construction

#### (a) Debris and Solid Waste

No change from the prior filings. Waste associated with structures and other materials formerly located on the two additional temporary work area parcels have been disposed of in accordance with applicable regulations and guidance.

#### (b) Waste Management Plan

No change from the prior filings.

#### (3) Operations

#### (a) Solid Waste

No change from the prior filings.

# (b) Waste Management Plan

No change from the prior filings.

#### (4) Licenses and Permits

No change from the prior filings.

#### (E) AVIATION

#### (1) Surrounding Air Navigation Facilities

No change from the prior filings.

# (2) Federal Aviation Administration Filings

# 4906-4-08 Health and Safety, Land Use, and Ecological Information

No change from the prior filings.

#### (A) HEALTH AND SAFETY

# (1) Equipment Safety

# (a) Public Safety Equipment

No change from the prior filings.

# (b) Equipment Reliability

No change from the prior filings.

# (c) Safety Manuals

No change from the prior filings.

#### (d) Public Access

No change from the prior filings. The same security measures will be applied to these additional temporary work areas as are in effect for other Facility construction work areas, including appropriate fencing and gating.

#### (e) Emergency Plans

No change from the prior filings.

#### (2) Impact of Air Pollution Control Equipment Failures

No change from the prior filings.

#### (3) Noise

No change from the prior filings.

#### (a) Construction Noise

No change from the prior filings. The additional temporary work spaces will be used to spread out parking, material storage, and construction trailer activities and will not increase construction-related noise levels. The two additional temporary work spaces are surrounded by other property currently used for construction purposes and, therefore, do not represent a material change.

#### (b) Operational Noise

No change from the prior filings.

#### (c) Noise-Sensitive Areas

No change from the prior filings.

#### (d) Noise Mitigation Measures

No change from the prior filings.

#### (e) Existing Ambient Conditions

No change from the prior filings.

### (4) Water

No change from the prior filings.

# (a) Construction and Operation Impacts

No change from the prior filings.

# (b) Impact of Pollution Control Equipment Failure

No change from the prior filings.

#### (c) Proximate Water Sources

No change from the prior filings.

# (d) Compliance with Water Source Protection Plans

# (e) Potential for Flooding

No change from the prior filings. As shown in Updated Figure 08-5, no flood zones exist on the additional parcel located north of Seneca Lane. Although a very small portion of mapped flood zone insects with northeastern corner of the additional parcel located south of Seneca Lane, no work will occur in that area.

# (5) Geological Features

# (a) Site Geology

No change from the prior filings.

#### (b) Soils and Soil Suitability

No change from the prior filings. No new mapped soil types exist within the additional work areas. As shown on Updated Figure 08-6, the additional parcel north of Seneca Lane is mapped with predominantly MeB soils, with a small area of McA soils. The additional parcel south of Seneca Lane is mapped with MeB and MeC soils, with a small lobe of GnA soils. All soils and their characteristics have been described in prior filings, and do not pose unusual constraints.

#### (c) Geotechnical Evaluation Plan

No change from the prior filings.

#### (6) Potential for High Wind Conditions

No change from the prior filings.

# (7) Potential Impact from Blade Shear

No change from the prior filings.

# (8) Potential Impact from Ice Throw

# (9) Potential Impact from Shadow Flicker

No change from the prior filings.

#### (10) Potential Impact to Radio and TV Reception

No change from the prior filings.

# (11) Potential Impact to Radar Systems

No change from the prior filings.

# (12) Potential Impact to Microwave Communications

No change from the prior filings.

#### (B) ECOLOGICAL RESOURCES

#### (1) Existing Ecological Resources

#### (a) Nearby Resources

No change from the prior filings. An Updated Figure 08-7 shows the presence of highly erodible or potentially highly erodible land within the additional temporary work spaces, similar to the larger Facility site.

#### (b) Vegetation, Wetland and Surface Water Survey

No change from the prior filings. The additional temporary work spaces previously consisted of a home and residential lawn; vegetation in these areas align with those species identified in Table 08-7 (as presented in the Application). In addition, the additional temporary work spaces were included in the July 2016 wetland survey. During the survey, Wetland C27, a 0.03-acre palustrine emergent wetland, was identified within the southern parcel of the additional temporary work spaces, along the edge of a farm road; no work will occur in that area. On the norther parcel, two small wet areas (totaling approximately 0.01 acre) are located in the

northwestern portion of the parcel, associated with a prior septic system in that location. This area will also be avoided.

TABLE 08-7
VEGETATION RECORDED WITHIN RESIDENTIAL LAWNS, MAINTAINED
UTILITY ROWS, UPLAND FIELDS, MANAGED AGRICULTURAL AREAS, AND
ACTIVE PASTURES

Common Name	Latin Binomial	
Allegheny Blackberry	Rubus allegheniensis	
Bitter Dock	Rumex obtusifolius	
Black Raspberry	Rubus occidentalis	
Canada Goldenrod	Solidago Canadensis	
Canada Thistle	Cirsium arvense	
Chicory	Cichorium intybus	
Coltsfoot	Tussilago farfara	
Common Chickweed	Stellaria media	
Common Cinquefoil	Potentilla simplex	
Common Dandelion	Taraxacum officina	
Common Milkweed	Asclepias syriaca	
Common Mugwort	Artemisia vulgaris	
Common Plantain	Plantago major	
Common Ragweed	Ambrosia artemisiifolia	
Common Wintercress	Barbarea vulgaris	
Common Yarrow	Achillea millefolium	
Crown Vetch	Securigera varia	
Eastern Daisy Fleabane	Erigeron annuus	
English Plantain	Plantago lanceolata	
Field Fescue	Festuca pratensis	
Garlic Mustard	Alliaria petiolate	
Green Headed Coneflower	Rudbeckia laciniata	

Common Name	Latin Binomial	
Ground Ivy	Glechoma hederacea	
Groundsel	Senecio vulgaris	
Horse Nettle	Solanum carolinense	
Indian Hemp Dogbane	Apocynum cannabinum	
Jimson Weed	Datura stramonium	
Mullein	Verbascum Thapsus	
Multiflora Rose	Rosa multiflora	
Onion Grass	Allium cernuum	
Orchard grass	Dactylis glomerata	
Path Rush	Juncus tenuis	
Poison Ivy	Toxicodendron radicans	
Pokeweed	Phytolacca Americana	
Poverty Grass	Danthonia spicata	
Purple Dead Nettle	Lamium purpereum	
Queen Anne's Lace	Daucus carota	
Red Clover	Trifolium pretense	
Redtop	Agrostris gigantean	
Reed Canarygrass	Phalaris arundinacea	
Shepherd's Purse	Capsella bursa-pastoris	
Small-flowered Agrimony	Agrimonia parviflora	
Small-flowered Bittercress	Cardamine parviflora	
Soft Rush	Juncus effuses	
Tall Goldenrod	Solidago altissima	
Tall Ironweed	Vernonia angustifolia	
Timothy	Phleum pratensis	
Unidentified Grape	Vitis sp.	
Unidentified Grass	Poaceae sp.	

Common Name	Latin Binomial
White Avens	Geum canadense
White Clover	Trifolium repens
Wild Onion	Allium cernuum
Wood Strawberry	Fragaria vesca
Yellow Foxtail	Setaria pumila

#### (c) Species Literature Survey

No change from the prior filings. As outlined in the Application, all tree clearing will be restricted to winter months (between October 1 and March 31), when Indiana bats (*Myotis sodalis*) and northern long-eared bats (*Myotis septentrionalis*) are not using roost trees unless appropriate mist net surveys are conducted to confirm the species are not present. As shown in Figures 02-2 and 02-4, only scattered trees are located within these parcels, resulting in limited additional clearing. It is not expected that these trees would be in use for summer roosting habitat given the active construction ongoing in surrounding areas.

Although the Ohio Department of Natural Resources did identify the Facility as within the range of the northern harrier (*Circus cyaneus*), based on location and field conditions, the additional temporary work spaces (residential lawn) do not represent potentially suitable nesting, breeding or hunting habitat.

#### (d) Additional Ecological Studies

No change from the prior filings.

#### (2) Potential Construction Impact

#### (a) Ecological Resource Impact Evaluation

#### (b) Mitigation

No change from the prior filings.

# (3) Potential Operation and Maintenance Impact

# (a) Ecological Resource Impact Evaluation

No change from the prior filings.

# (b) Mitigation

No change from the prior filings.

### (c) Post-Construction Monitoring of Wildlife Impacts

No change from the prior filings.

# (C) LAND USE AND COMMUNITY DEVELOPMENT

#### (1) Land Use

#### (a) Land Use Mapping

No change from the prior filings.

# (b) Existing Structures

All previously existing structures within the Facility area, including within the two new temporary work areas, have been demolished and disposed of appropriately. This includes S-4, S-5, S-6, S-7, S-8, and S-9; see Updated Table 08-11. No other change from the prior filings.

# UPDATED TABLE 08-11 STRUCTURES WITHIN 1,000 FEET AND 250 FEET FROM GENERATING EQUIPMENT AND FACILITY FOOTPRINT

Structure (S-X)	Structure Type	Approximate Distance from Generating Equipment and Supporting Features (up to 1,000 feet)	Distance from Facility Footprint (within 250 feet)	Property being leased by Applicant, option to purchase, purchased or Not Applicable (N/A)
S-1	Residential structure with garage	765 feet	-	N/A
S-2	Residential structure with garage	870 feet	-	N/A
S-3	Residential structure with garage	800 feet	-	N/A
S-4	Residential structure with garage	Demolished	Demolished	Purchased
S-5	Residential structure	Demolished	Demolished	Purchased
S-6	Residential structure with garage	Demolished	Demolished	Purchased
S-7	Residential structure with garage	Demolished	Demolished	Purchased
S-8	Residential structure	Demolished	Demolished	Purchased
S-9	Large storage structure	Demolished	Demolished	Purchased
S-10	I-77 Rest Stop Building	950 feet	-	N/A
S-11	Residential structure with garage	900 feet	-	N/A
S-12	Residential structure with garage	790 feet	-	N/A
S-13	Residential structure with garage	800 feet	-	N/A

Structure (S-X)	Structure Type	Approximate Distance from Generating Equipment and Supporting Features (up to 1,000 feet)	Distance from Facility Footprint (within 250 feet)	Property being leased by Applicant, option to purchase, purchased or Not Applicable (N/A)
S-14	Residential structure with garage	690 feet	-	N/A
S-15	Residential structure with garage	950 feet	-	N/A
S-16	Residential structure with garage	730 feet	-	N/A
S-17	Residential structure with garage	860 feet	-	N/A
S-18	Industrial structures	600 feet	-	N/A

# (c) Land Use Impacts

No change from the prior filings. The additional temporary work spaces will be restored following completion of construction.

#### (d) Structures to be Removed or Relocated

As shown on in Updated Figure 08-10B, two residences (S-4 and S-6), previously located within the additional temporary work spaces, have been demolished. No other changes from the prior filings.

# (2) Wind Turbine Structure Locations

No change from the prior filings.

# (3) Land Use Plans

# (a) Formally Adopted Plans for Future Use

# (b) Applicant Plans for Concurrent or Secondary Use of the Site

No change from the prior filings.

#### (c) Impact to Regional Development

No change from the prior filings.

# (d) Compatibility with Current Regional Plans

No change from the prior filings.

# (e) Demographic Characteristics

No change from the prior filings.

#### (D) CULTURAL AND ARCHAEOLOGICAL RESOURCES

No change from the prior filings.

#### (1) Cultural Resource Mapping

No change from the prior filings.

#### (2) Cultural Resource Impacts

No change from the prior filings. Similar to other areas within the Facility area, the additional temporary work spaces are considered residential disturbance. As outlined in the May 2017 Cultural Report, disturbances from modern residential activity including the construction of recreation facilities, modern outbuildings, and the creation of trash dumps, push piles, farm roads were noted around the existing residences on the property and were not subject to subsurface as a result of the disturbance. The additional temporary work spaces have also been subject to residential impacts within each 1-acre area and are not considered to have archaeological sensitivity. Coordination will occur with the Ohio Historic Preservation Office for confirmation.

#### (3) Recreational Areas

#### (4) Visual Impacts

# (a) Project Visibility

No change from the prior filings.

# (b) Existing Landscape

No change from the prior filings.

# (c) Landscape Alterations

No change from the prior filings.

#### (d) Visual Impacts

No change from the prior filings.

# (e) Photographic Simulations

No change from the prior filings.

#### (f) Proposed Mitigation Measures

No change from the prior filings.

#### (E) AGRICULTURAL DISTRICTS

# (1) Agricultural Land Mapping

No change from the prior filings.

# (2) Potential Impact to Agricultural Land

#### (a) Acreage Impacted

No change from the prior filings.

# (b) Impact of Project Activities

No change from the prior filings.

# (c) Agricultural Mitigation Practices

0	F)	(F) OTHER CONSIDERATIONS IN PREPARING THE APPLICATION	ATION
٠.	-,	1) OTHER CONSIDERATIONS IN TREE MAINS THE MITTERS	

# Figures

# Section 4906-4-02 Project Summary and Applicant Information

- Updated Figure 02-1 Facility Location
- Figure 02-2 Additional Temporary Work Area Northern Aerial View
- Figure 02-3 Additional Temporary Work Area Northern Proposed Use
- Figure 02-4 Additional Temporary Work Area Southern Aerial View
- Figure 02-5 Additional Temporary Work Area Southern Proposed Use

# Section 4906-4-03 Project Description and Schedule

• Updated Figure 03-2 Proposed Facility and Vicinity

# Section 4906-4-08 Health and Safety, Land Use, and Ecological Information

- Updated Figure 08-5 FEMA Flood Zones
- Updated Figure 08-6 Soils
- Updated Figure 08-7 Natural Resource Characteristics of the Site and Surroundings
- Updated Figure 08-10B Surrounding Land Use Structures

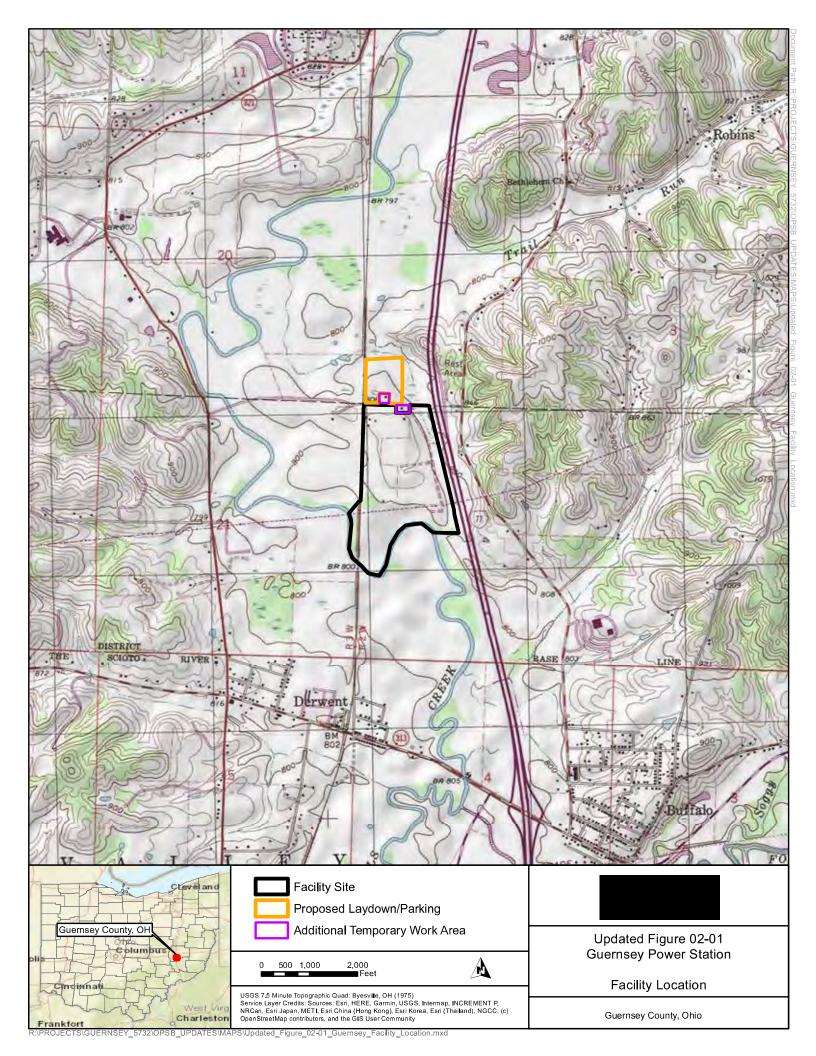




Figure 02-2 Additional Temporary Work Area – Northern – Aerial View

Guernsey Power Station Guernsey County, Ohio



Figure 02-3
Additional Temporary Work Area – Northern – Proposed Use

Guernsey Power Station Guernsey County, Ohio



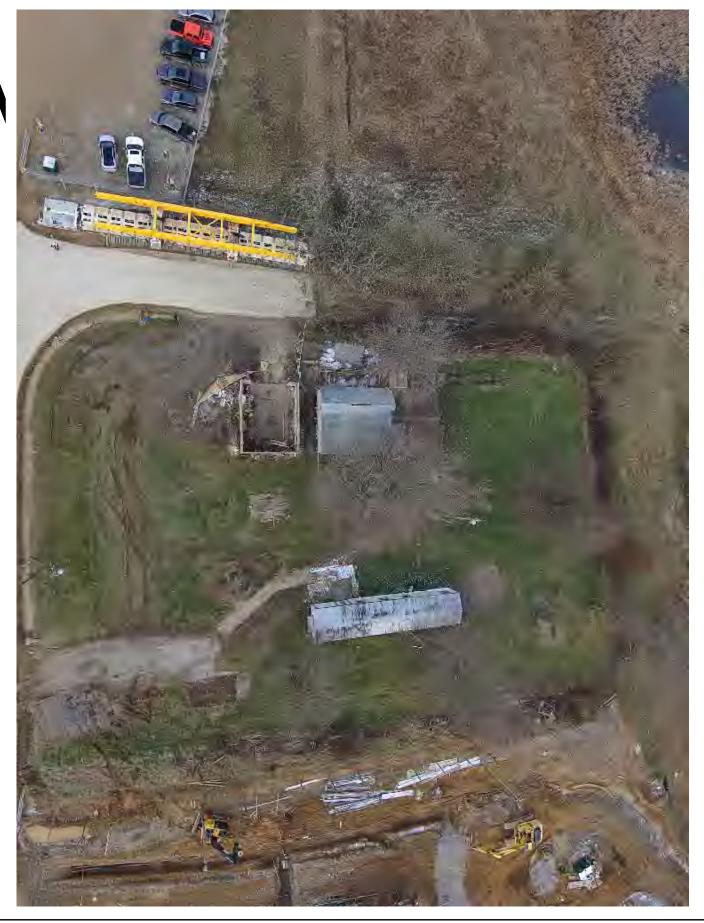


Figure 02-4 Additional Temporary Work Area – Southern – Aerial View

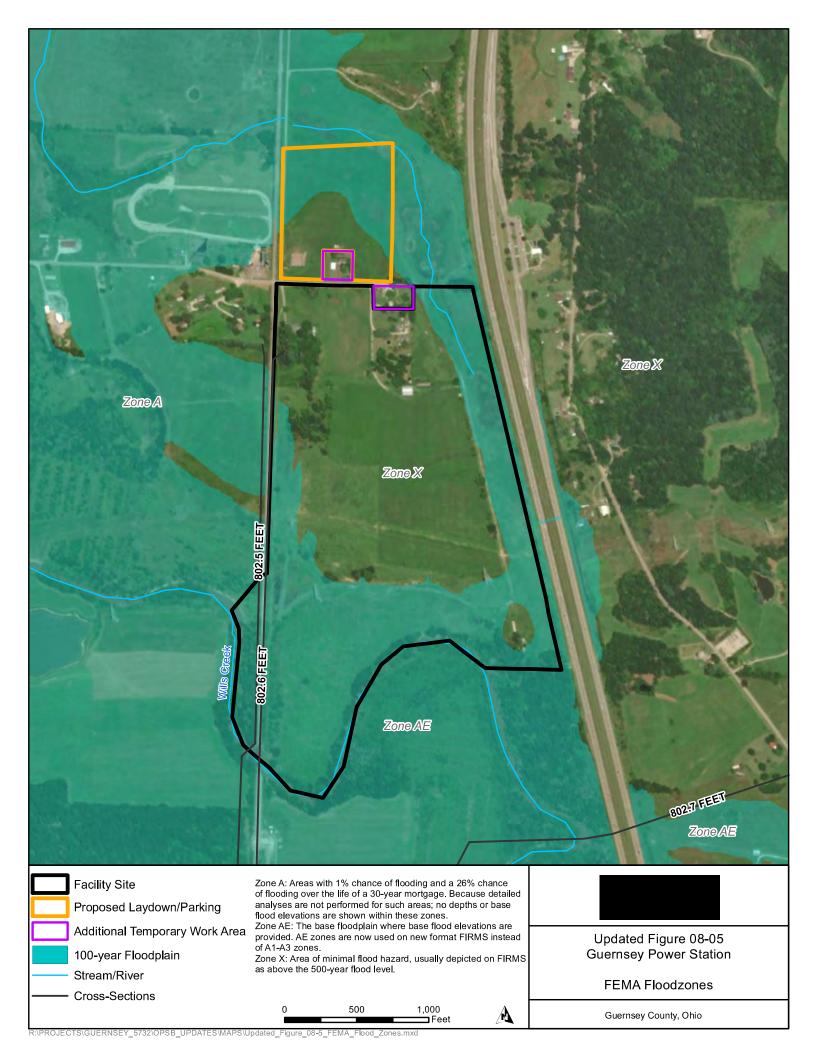
Guernsey Power Station Guernsey County, Ohio

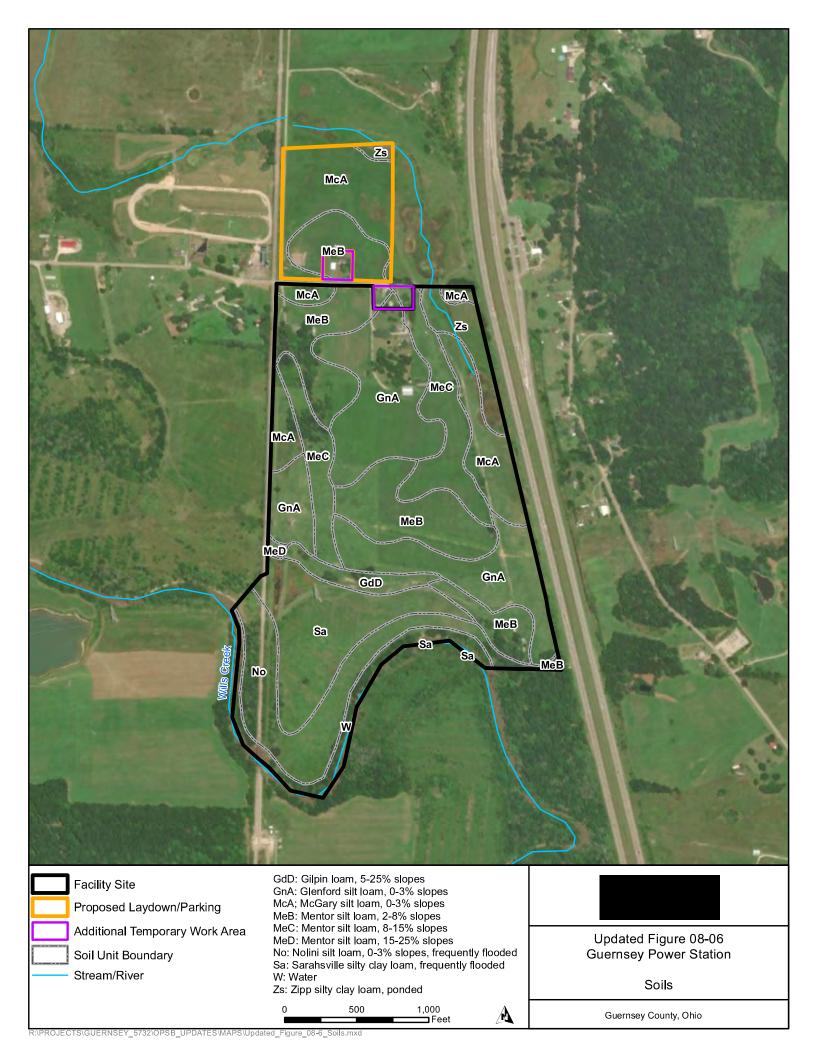


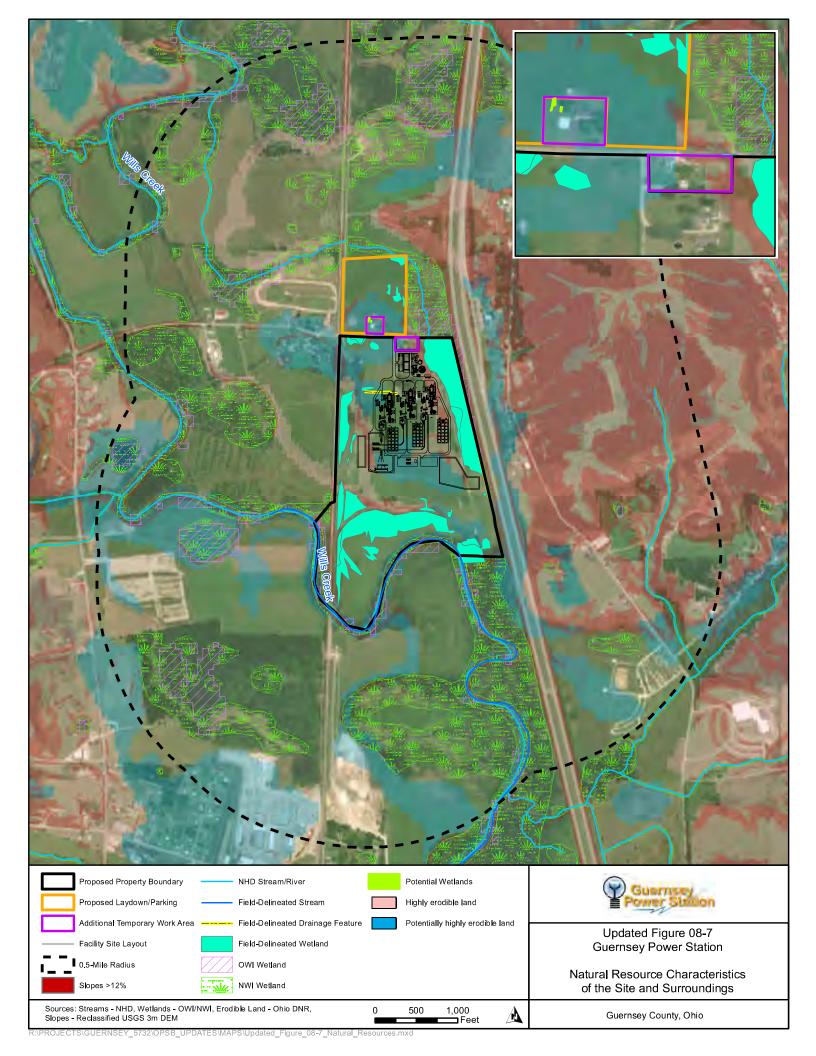
Not to Scale

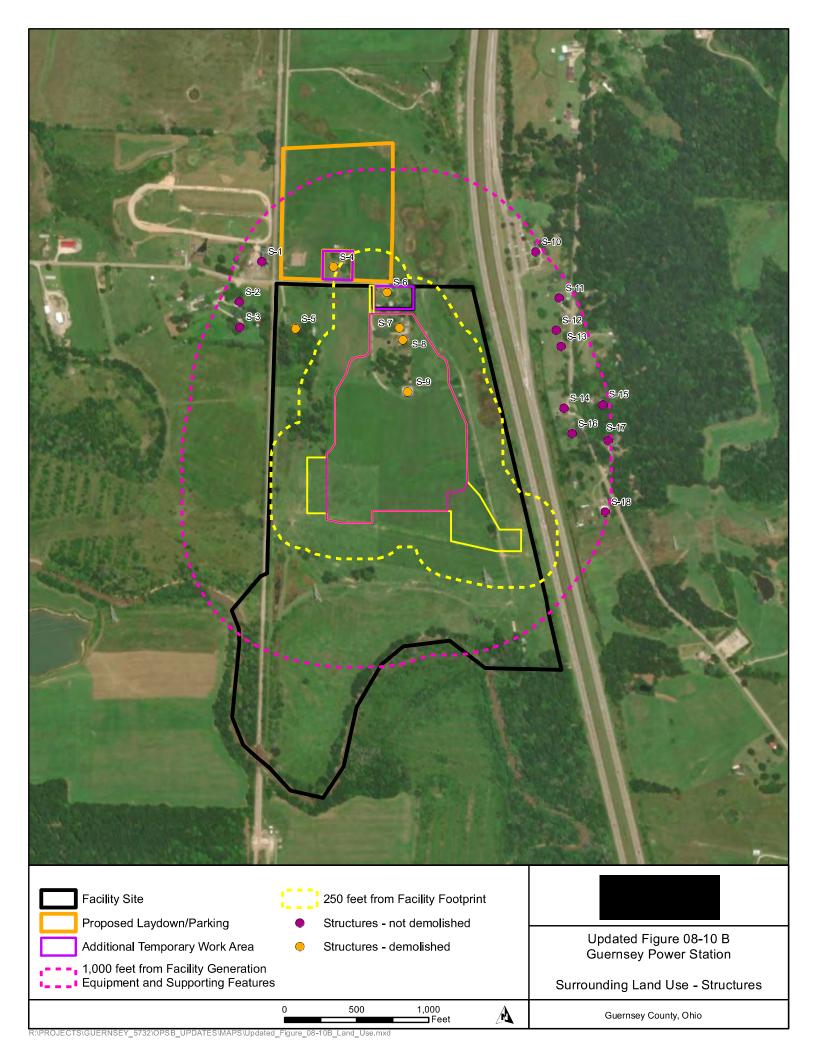
Figure 02-5
Additional Temporary Work Area – Southern – Proposed Use

Guernsey Power Station Guernsey County, Ohio









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Summary: Text Third Amendment Application of Guernsey Power Station, LLC electronically filed by Teresa Orahood on behalf of Dylan F. Borchers