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Emergency Action Plan
Westwood
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Emergency Action Plan

Grover Hill Wind Farm

Paulding County, Ohio

Prepared For:

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1.0 Project Information

Grover Hill Wind, LLC (Grover Hill), a wholly-owned subsidiary of Starwood Energy Group Global, Inc. (Starwood), a Delaware limited liability company, proposes to develop and construct an up to 150 megawatt (MW) wind-powered electric generating facility (Grover Hill Project or Project) located in Paulding County, Ohio. The Project will consist of up to 23 wind turbine generators and associated improvements, including buried electric cables, pad-mount transformers, access roads, an electrical substation, overhead electric lines, permanent meteorological towers, and an operations and maintenance building.

2.0 Introduction

The purpose of an Emergency Action Plan (EAP) is to protect the employees, contractors, and visitors from serious injury, property loss, or loss of life in the event of an actual or potential major disaster. A major disaster may include any of the following: fire, tornado, earthquake, bomb threat, or hazardous chemical spill. In the event of a major disaster, this Emergency Action Plan describes initial responsibilities and actions which must and will occur in order to protect the safety of all employees, contractors, and visitors until the appropriate local/county health and safety responders take over.

3.0 Regulatory Scope

This EAP addresses Occupational Safety and Health Act (OSHA) requirements for emergency response management and plans (29 Code of Federal Regulations (CFR) 1910.38 and 1910.120). A Spill Prevention Control and Countermeasure Plan (SPCC) will be prepared under separate cover that addresses oil pollution prevention and spill response requirements as specified in 40 CFR Part 112.

It is a requirement that the employer review with each employee upon initial assignment or when the plan changes, those parts of the plan that the employee must know to protect themselves in the event of an emergency. In addition, the written plan shall be made available for all employees, contractors, and visitors to review and plan for their evacuation.

4.0 Emergency Action Plan Overview

It is impossible to provide specific information for all potential situations and the development and implementation of this EAP does not guarantee implied that a perfect response to disaster emergency incidents will be practical or possible. This plan is provided to serve as a guide for employees and an aid to assist them to become familiar with basic emergency planning, response, and evaluation.

5.0 Emergency Action Plan Design

5.1 Preparatory Planning

Pre-planning for emergencies is a crucial element of this plan. The following steps have been taken in planning for emergencies at the site:

- Main road exits are established and are posted in the O&M Building.

- Evacuation route diagrams have been documented and posted in the O&M Building. Employees should be familiar with at least two evacuation routes. The following information should be marked on the maps.
 - Emergency and accessible exits
 - Evacuation routes
 - Location of fire extinguishers
 - Inclement severe weather (Tornado) shelter
- Site personnel receive instruction to keep exits from the site or O&M Buildings clear and to maintain ready access to fire extinguishers by not blocking them with furniture, or any other means.
- The Site Manager and Lead Technician have been trained in their specific duties and all building occupants have been instructed in what to do in case of an emergency through their copies of procedures, and training as needed.
- Fire evacuation drills, tornado drills, chemical agent threat drills, and bomb threat drills are each held at least annually on this site and are critiqued and documented. Prior to holding a drill, the plant management will be given a timeframe within which the drill will be conducted (ie – during a specific calendar week).

5.2 Notification of Emergency Warning

In advance of or at the onset of a disaster, warning may come from any of the following sources: commercial radio or television, NOAA radio, web/internet, building smoke detection, emergency siren or local authorities. It is recommended that several sources be monitored to assist in determining when emergency situations exist since no one system can cover all circumstances. A person receiving notification of a possible disaster, or a building emergency should immediately notify employees/contractors/visitors and immediate supervisor who will initiate evacuation of the building and/ or project area.

5.3 Management Team Assignments and Responsibilities

Should an emergency occur at the Project, management personnel will assume leadership roles for the emergency response. The Site Manager and Lead Technician will assist in the implementation of this plan by knowing and communicating evacuation routes to workers during emergency evacuation and reporting the status of the evacuation to the Site Manager or Lead Technician and the Fire Department. The Site Manager is responsible for seeing that this plan is implemented and will appoint an adequate number of personnel to enforce the plan, assure everyone is familiar with this plan and act as a liaison with the local Fire Departments.

Specific duties to be assumed by the Site Manager and Lead Technician in the implementation of this EAP include:

- Conducting an annual review of the EAP. Revise and update information, as necessary.
- Make copies of the EAP and ensure that they are available to employees, contractors, and visitors. Provide copies to corporate management, as necessary.
- Schedule training exercises to test evacuation plan annually.
- Instruct personnel on their duties and obligations to understand and adhere to the EAP.
- Direct initial emergency response actions
 - Assign specific safety or emergency response tasks to personnel
 - Order evacuation, if deemed necessary
- Assess the nature and extent of all emergencies and be able to communicate those details to local emergency responders

- Assume initial control of all emergency action until local emergency responders arrive

5.4 Emergency Evacuation

5.4.1 Evacuation Planning

Preparation and planning for emergencies are essential for emergency evacuations to be effective, efficient, and safe. Grover Hill will perform regular evacuation drills to familiarize employees and contractors of the evacuation procedures in the event of a real emergency. If possible, local emergency responders will be invited to participate and assist with critique of evacuation drills.

Grover Hill employees and contractors will be instructed on the following:

- Be aware of at least two exits whenever possible. If terrain features do not allow for two exits, any means for egress is to be addressed before work can be initiated in these areas.
- Be familiar with the evacuation routes posted in the O&M Building.
- Establish a procedure to account for employees and coordinate with contractors to receive a confirmed headcount
- Establish a procedure for reporting to emergency personnel any missing, trapped, or injured occupants

A Grover Hill evacuation sheet must be posted and orally communicated to site personnel. It is recommended that these procedures be discussed at periodic safety meetings in addition to being covered during new employee orientation.

5.4.2 Evacuation Routes

A map of all evacuation routes will be displayed throughout the O&M building. Each map will highlight the most expedient route to an exit relative on where that person is located. It will be the responsibility of Site Managers/ Chaperones to inform employees/contractors/visitors of these evacuation routes. The Operations Manager shall verify that signs are in place and up to date during self-site inspections

Depending upon the degree of emergency, weather and/or site conditions, roadways as designated on the site drawings will be used for routes of evacuation. In the event of an evacuation, all personnel will meet at the O&M Building for further information. If personnel are unable to make it to the designated assembly area, they should seek shelter wherever possible and contact their supervisor for further instructions.

5.4.3 Evacuation Procedures

When notified to evacuate, site personnel shall do so in a calm and orderly fashion, keeping the following instructions in mind.

- Walk, don't run.
- Drive safely through smoke, if you must.
- Watch for other traffic.
- Move at a 90° angle to the fire wall, not towards, or away if possible.
- Keep conversation level down.
- Help others in need of assistance.

Site personnel will go immediately to the primary designated assembly area which is the O&M Building to coordinate evacuation efforts. If employees are unable to make it to the O&M building, they should contact their supervisor for further instructions. During evacuation, the Site Manager and Lead Technician should assure every person on his/her crew has been notified and that evacuation routes are clear. Any person with a disability (mobility, hearing, sight) who requires assistance to evacuate is responsible for pre-arranging with someone in their immediate work area to assist them in the event of an emergency. Anyone knowing of a person with a disability or injury who was not able to evacuate will report this immediately to the Site Manager, Lead Technician, or Emergency Coordinator.

5.4.4 Specific Evacuation Needs / Disabilities

Each person has different skills and abilities. Specific provisions for individuals with disabilities in the event of an emergency may be necessary and must be defined in advance of emergency situations. The employee with a specific need or disability is responsible for informing his/her immediate supervisor that he/she will require assistance during an evacuation. It is important not to assume that persons with obvious disabilities need assistance, or to assume what type of assistance they may need.

5.5 Tower Work Safety Procedure

All personnel involved in elevated work situations are to be familiar with the safety requirements so that they can help establish and maintain a safe work environment. All equipment used for fall protection shall comply with ANSI 1359. I and Subpart M (Fall Protection Standard). All employees performing elevated tower work must have formal "Tower Safety and Rescue training" as specified by company policy. When ascending a tower, there must be a minimum of two climbers that have had formal training in Tower Safety and Rescue Training. Proof of certification for each climbing employee must always be maintained on site. Local emergency response authorities will be given turbine locations in the event of an injury; any injured person will be lowered to the base of the turbine and met by local emergency response authorities.

When a Tower Rescue becomes necessary due to a fall, injury, or other emergency, the person discovering the situation will immediately make notification by radio/cell phone about the nature of the emergency. Upon notification of the emergency, the Site Manager/Emergency Coordinator or the person receiving notification of the emergency will call 911. The person notifying the Emergency Center will inform the dispatcher of the location, tower number, the degree of the emergency and the extent of injuries. The Site Manager or Emergency Coordinator will appoint someone to meet emergency personnel and direct them to the tower location.

5.6 Fire Procedure

In the event of an incipient stage (beginning, small) fire, employees should immediately notify adjacent individuals of this situation and exit the area via defined evacuation routes. Only employees trained in the use of fire extinguishers should attempt to use an extinguisher. Employees are not expected or authorized to respond to fires beyond the incipient stage (i.e., fires that are beyond the beginning stage and which cannot be extinguished using a hand-held, portable fire extinguisher). If necessary, the fire department should be immediately notified by dialing 911. Even in the event of a small fire that is extinguished by employees, the fire department will come to check the area out with a thermal imager to ensure fire has not spread anywhere not readily visible. The site management shall also be immediately notified of any emergency.

The following actions should be taken by area personnel while awaiting the local fire department:

- Verbally warn employees in the immediate area upon discovery of smoke or fire. All employees are required to evacuate the building.
- Dial 9-1-1 to report the fire to the authorities.
 - Give your name and address with closest major intersection and type of emergency.
 - Stay on the line with dispatcher until all necessary information has been given.
- Make sure the immediate area of the fire is clear of personnel.
- **CLOSE THE DOORS AS YOU LEAVE.**
- Station available personnel at road intersections to stop traffic flow into the fire scene.
- Use stairways. When out, move away from building to the **PRIMARY MEETING PLACE** (secondary if primary is compromised) for a head count. You should be as far out from the building as it is high.
- Account for all employees, contractors, and visitors working in the area of the fire.
- Notify firefighters if you suspect someone may be trapped inside the building.
- Remove obstructions (vehicles, material, etc.) that might impede response to the scene.

In the event of an out-of-control fire, employees are to exit the area as quickly as possible and assemble for head count. At least one employee (if available) should be sent to the site entrance to direct responding emergency services personnel to the appropriate location. When emergency services are responding, they will meet a Grover Hill representative at the entrance to the O&M Building. From there, the Grover Hill representative will escort the fire department personnel to the site of the fire emergency.

5.6.1 Grass or Brush Fire

In the event of grass or brush fire, the notifying employee will contact the Site Manager/Emergency Coordinator with the exact location and size of the fire. The Site Manager/Emergency Coordinator will contact 911 and/or the local emergency response service and coordinate with the notifying employee to lead firefighting equipment to the fire. All other employees will be notified by radio or cell phone of the plant entrance at which to rendezvous with the fire department, if needed. Grover Hill will contact any homeowners in the area with the location and size of the fire. Employees may be directed by Grover Hill to visit any dwellings that may be in the anticipated path of fire. Employees shall at no time attempt to extinguish or "fight" a large brush or grass fire. The employee role is to notify Grover Hill and lead firefighting equipment to the scene.

5.6.2 Turbine/Tower Fire

Turbine fires which occur when the turbine is unoccupied will be managed with the same protocols defined for a grass or brush fire. If a fire occurs in the bottom control cabinet or the tower while employees are working in the nacelle, employees shall immediately open all nacelle hatches, then following all fall safe procedures, remain in smoke free air until directed by firefighting personnel to climb down. If a fire occurs in the nacelle while employees are present, employees shall abandon all tool and equipment and immediately descend the tower ladder or evacuate via an emergency descent device.

5.6.3 Electrical Fire

In the event of a fire inside a substation enclosure, the notifying employee shall provide the Site Manager/Emergency Coordinator with the location and source of the fire. The Site Manager/Emergency Coordinator will contact 911 or the local emergency response service and coordinate with the notifying employee to lead firefighting equipment to the location of the substation. Transformers and capacitors contain flammable, combustible material and all personnel must remain in safe areas away from these explosive sources.

5.7 Environmental Emergencies / Severe Weather

Severe weather (thunderstorm, tornado, flash floods) can occur with minimal notice based on local weather conditions. A DTN weather satellite may be monitored via computer at the O&M Building. SCADA operators also monitor this system and when inclement weather threatens, they will notify employees to evacuate the site, or to take cover.

In the case of a severe storm approaching the Project, the following steps are to be taken:

Severe Storm Warning (1 to 24 hours' notice):

1. Employees should make sure that all materials and equipment are secured by this time.
2. All crane booms shall be lowered to the ground and secured.
3. All small vehicles, welding machines and compressors shall be secured.
4. All office trailers and buildings shall be locked.
5. Storm will be monitored and, if necessary, site shall be evacuated.

Prevention efforts and common practice in advance of severe weather would include maintaining access to local television, AM/FM radio, or NOAA Weather Radio to be made aware of severe weather watches or warnings.

A Severe Weather Watch is issued when weather conditions are favorable for the possible development of severe weather (thunderstorms/tornadoes). Under a watch it is anticipated that normal operation activities will continue but someone should monitor the situation and notify others if conditions deteriorate.

A severe Weather Warning is issued when a thunderstorm or tornado has been occurring or sighted in the area. In addition to dark clouds and/or hail the emergency siren may sound.

5.7.1 Lightning

No employees, contractors, or visitors are allowed in or near a turbine during or within at least one hour after an electrical storm has passed. This protocol is established due to the potential risk of static electricity on the blades and possible discharge. A warning will be issued to the site by the Site Manager when the lightning is detected within 30 miles of the site. Crews will be notified that lightning has been detected within 30 miles and the tower evacuation may be initiated at that time.

Following the notification of potential severe weather each work crew must acknowledge the warning by radio or cell phone. It is incumbent of work crews to monitor their work area themselves upon notification and be alert for lightning strikes in their immediate region as some lightning strikes are undetected by the monitoring services. Notification of any such observation must be forwarded to the Site Manager.

A stand down notification will be issued when lightning is detected within eight (8) miles of the Project site. Upon notification crews will stop work, acknowledge the notification by radio or cell phone, evacuate the wind turbine generator and return to the O&M Building.

The stand down order will remain in effect until the Project site has received an "ALL CLEAR". An "ALL CLEAR" will be issued when the lightning has been outside of the 30-mile radius for at least five (5) minutes.

5.7.2 Thunderstorms, High Winds

In the event of storm events that produce lightning, work will be stopped in all towers on site, as they attract lightning. Once lightning is observed within 50 miles of the work site, personnel working up tower will start getting tools and equipment together in preparation of evacuation. Towers will be evacuated when lightning is within 30 miles of the work site. Lightning can strike from an approaching storm or one that has already passed that is up to 20 miles away.

Employees are to evacuate any towers when given the signal from the SCADA Operator, Lead Technician, Site Manager/Emergency Coordinator, and take cover in vehicles or trailers. Water, high ground, open spaces, solitary tall trees, and metal objects should be avoided. If shelter is not available, employees/contractors should: 1) crouch down with both feet together; 2) do not lie down or place hands on the ground; 3) do not stand near other people. Keep a minimum distance of 15 feet apart.

If inside a shelter, employees/contractors should: 1) stay away from doors, windows and avoid water; 2) turn off and unplug electrical appliances (e.g., computers, power tools); 3) if appliances cannot be unplugged (e.g., telephones), stay away from them.

Individuals injured by lightning do not carry an electrical charge and can be handled safely. Trained employees/contractors should administer first aid/cardiopulmonary resuscitation (CPR) to a lightning victim. Send for help immediately.

If heavy winds occur, seek shelter immediately. Loose materials can become airborne. No work is allowed in the WTG when there are steady winds of 15m/s (40mph), or over a 10-minute average or more (authorization must be obtained from a supervisor).

5.7.3 Tornadoes

Tornadoes could occur in the Project Area. In the event of a severe storm, work will be stopped. If the National Weather Service alerts a Tornado Warning, employees will take proper shelter. If a tornado warning is activated in a neighboring county, and weather service has forecasted the tornado towards the project, employees will tie down any needed equipment. The Site Manager, Lead Technician, or Emergency Coordinator may dismiss employees from the site if conditions warrant it.

Employees and contractors are expected to understand and be familiar with the warning signs of a tornado as some tornadoes do occur without the issuance of a tornado warning. There is no substitute for staying alert to the sky. Several common features associated with tornadoes include:

- Strong, persistent rotation in the cloud base.
- Whirling debris on the ground under a cloud base. Not all tornadoes have a visible funnel.

- Hail or heavy rain followed by either calm air or a fast, intense wind shift. Tornadoes can be masked by heavy precipitation and not be visible.
- Day or night - Loud, continuous roar or rumble.

Indoors

If you are inside a building you should go to the basement, lowest floor, small center room (like a bathroom or closet), under a stairwell, an interior hallway, any room with no windows. Go to the center of the room. Stay away from corners as they attract debris if the room is exposed during the storm. Place yourself under sturdy protection (heavy table, work bench, desk), or cover with a mattress or sleeping bag.

Vehicle

If you are in a vehicle you should park the car as quickly and safely as possible away from active traffic lanes. If possible, leave the vehicle and seek shelter in a sturdy building. If no such shelter is available, find an area of low ground that is away from any cars and other larger items (which may be moved by high winds). Lie flat and face-down, protecting the back of your head with your arms. Do not seek shelter under bridges while in your vehicle as this can become a potential traffic hazard.

Open Area

If you are in open area, seek shelter in a sturdy building. If no such shelter is available, find an area of low ground that is away from any cars and other larger items (which may be moved by high winds). Lie flat and face-down, protecting the back of your head with your arms. Get as far away from trees and cars as you can; they may be blown onto you in a tornado.

Once the tornado has passed you should wait for emergency response personnel to arrive. If trained, provide first aid to those who are injured. Stay away from downed power lines as they may still be conducting electricity. Avoid debris and do not enter damaged structures. Do not use matches or lighters in case of compromised gas lines or fuel tanks. Remain calm and alert and listen for information and instructions from emergency crews or local officials.

5.7.4 Flash Flooding

Flooding can occur because of either long-term, sustained precipitation or short-term intense weather events. Monitoring of emergency broadcasts is important to ensure proper preparation for such events. While flash floods pose limited potential problems at Grover Hill, during a significant rain event, employees, contractors, and visitors should seek high ground. Flash floods can trap people in low level areas. Employees are to only travel through minimal moving water if they MUST. Otherwise, if water poses no further danger, they are to stay on high ground until the water subsides.

If the order to evacuate the Project facilities is ordered the following precautionary procedures should be executed if time permits.

- Turn off the gas, electricity, and water feeds and move vital materials and equipment to higher elevations.
- Disconnect any appliances to prevent electrical shock when power is restored.
- DO NOT attempt to drive or walk across creeks or flooded roads.
 - Six inches of water will reach the bottom of most passenger cars and potentially cause a loss of control and/or vehicle stall.

- Many vehicles will float in a foot of water.
- Two feet of rushing water can carry away most vehicles including sport utility vehicles (SUV's) and pick-ups.

Following the flash flood, it is important to avoid flooded areas as the water may be contaminated by oil, gasoline, or raw sewage. Further, flooded areas may be electrically charged from underground power cables or damaged/downed power lines. Always avoid moving water.

Before returning to work sites or re-initiating any Project-related activity, employees and contractors should review their respective work areas for any potential hazards that may have developed because of significant precipitation or flash flood waters. Roads may have weakened and could collapse under the weight of a car.

5.7.5 Earthquakes

Earthquakes generally occur without any warning. The immediacy of both the onset and impacts of an earthquake requires that personnel attempt to find shelter or reach a safe location.

If you are located within a building at the time of the earthquake seek shelter under a table or desk as soon as possible. If you get under a table and it moves, try to move with it, maintaining as much cover under the table or desk as possible. It can provide you with air space if the building collapses. In lieu of a table or desk, the inner walls or door frames of the building are generally supported by other interior structure and are less likely to collapse. The structural support may also provide a against falling objects. If other cover is not available, go to an inner corner or doorway that is separated from windows or glass panels. Avoid glass, hung objects, cabinets with doors, bookcases, or other large furniture that could fall or swing open. Shield your head and face from falling debris and broken glass. If the power goes out, use a battery-operated flashlight for light. Avoid using candles, matches, or lighters during or after the earthquake in case of a gas leak.

If you are in an automobile you should stop as quickly and as safely as possible. You should park the vehicle on the shoulder of the road or closest to the curb. If possible, find a location that is separated from utility poles and overhead power lines. Never park the vehicle under a bridge or on an overpass. You should stay in the vehicle with the parking brake set. Turn on the radio to be aware of any emergency broadcasts.

If you are performing work at a wind turbine you should stay inside the turbine while avoiding standing directly below openings. Objects may become dislodged and fall. Distance yourself from electrical panels and large, unmounted equipment.

Once the initial shock of the earthquake has passed, employees should make efforts to either contact the Site manager/Emergency Coordinator, or, if possible, return to the O&M building, or other such designated assembly area. You should assess the work site area for heavy equipment, construction, or maintenance in process, as materials may fall, tip over, or collapse in the area. Be aware that aftershocks may occur. While may be of lesser magnitude than the main earthquake, they may be significant enough to cause additional damage or bring down structures weakened during the initial earthquake.

Prior to returning to building or other structures it is important to recognize that the earthquake may have damaged internal features of the structures that are not readily observable. The following series of actions should be considered when re-entering buildings.

If there is an odor of gas:

- Open multiple windows to provide significant cross ventilation and allow the gas to escape the building and dissipate.
- If accessible and not damaged, shut off the main gas valve to the building. Do not assume that this will alleviate the presence of gas in the building.
- Do not turn any electrical appliances or lights on or off as the internal wiring may arc and ignite the gas.
- If none of the fore-going actions are possible, leave the building.
- Report the leak to authorities
- Do not reenter the building until a Utility official says it is safe to do so.

Other structural issues may become obvious during an inspection of the building.

- Check to see if there is any evidence of damaged water supply or sanitary sewage lines before using bathrooms or plumbing.
- Do not approach or touch downed power lines or objects in contact with downed lines. If possible, establish a perimeter around the potential electric hazard and report the issue to the authorities.
- Immediately clean up spilled medicines, drugs, flammable liquids, and other potentially hazardous materials using caution to protect yourself. If the material spill is of an unidentified substance, do not initiate clean-up efforts, as your actions may cause additional harm.
- Stay off all telephones except to report an emergency. Replace telephone receivers that may have been knocked off by the earthquake.
- Cooperate with emergency response officials. Respond to requests for volunteer assistance from police, fire fighters, emergency management officials, and relief organizations, but do not go into damaged areas unless assistance has been requested.

5.7.6 Blizzards, Winter Storms

Blizzards and other severe winter storms can be difficult and dangerous. The extreme cold, high winds, ice, and freezing rain often result in power outages and automobile accidents. Preparing for a blizzard means being aware of weather alerts.

Indoors

If you are inside a building stay indoors and wear warm clothes. Layers of loose-fitting, lightweight, warm clothing will keep you warmer than a bulky sweater. If you feel too warm, remove layers to avoid sweating; if you feel chilled, add layers. Listen to a local station on battery-powered radio or television or to NOAA Weather Radio for updated emergency information. Eat and drink regularly. Conserve fuel. Winter storms can last for several days, placing great demand on electric, gas, and other fuel distribution systems (fuel oil, propane, etc.). Lower the thermostat to 65° F (18° C) during the day and to 55° F (13° C) at night. Close off unused rooms, and stuff towels or rags in cracks under the doors. Cover the windows at night.

Vehicle

If you become stranded in a vehicle you should stay in the vehicle and wait for help. Do not leave the vehicle to search for assistance unless help is visible within 100 yards (91 meters). Display a brightly colored sign to indicate you are stranded and in need of help. Turn on the engine for about 10 minutes each hour (or five minutes every half hour). Short periods of engine engagement reduce the risk of carbon monoxide poisoning and conserves fuel. Use the heater

while the engine is running. Keep the exhaust pipe clear of snow, and slightly open a downwind window for ventilation.

Outdoors

If you must go outside, protect yourself from winter storm hazards by wearing layered clothing, mittens or gloves, and a hat. Outerwear garments should be tightly woven and water repellent. Mittens or gloves and a hat will prevent the loss of body heat. Cover your mouth to protect your lungs from severely cold air. Avoid taking deep breaths; minimize talking. Watch for signs of hypothermia and frostbite. Keep dry and change wet clothing frequently to prevent a loss of body heat. Wet clothing loses much of its insulating value and transmits heat rapidly away from the body.

5.7.7 Icing

Weather conditions should be assessed, and forecasts should be reviewed prior to initiating any work on Project facilities. The potential for weather conditions conducive to the accrual of ice on the turbine blades should be discussed during the pre-work meetings. When such conditions are present an initial inspection should be performed from a safe distance to assess the potential for ice shedding. Binoculars or a spotting scope should be used to help identify ice on blades, nacelle or hub. If ice is observed, personnel should notify site management immediately before proceeding.

Conditions that may indicate icing or ice shedding are possible include:

- Below normal production than expected for the current wind speed.
- Irregular patterns in wind energy production.
- Visible ice or snow on the turbine and/or blades.
- Signs of fallen ice around the turbine or in the surrounding area.
- Temperature around the freezing point.
- Freezing rain within the last 24 hours.

If the shedding of ice is observed in the area, employees and contractors should avoid the area and not attempt to enter the facility. Employees and contractors should remain at a safe distance away from the turbine and contact the Site Management/Emergency Coordinator immediately.

If entering the turbine is required when icing or ice shredding potential is identified, the turbine must be stopped, and the blades should be aligned down wind and opposite the entry door. Following the stopping of the turbine, employees and contractors should wait a minimum of 5 minutes to ensure no ice is shedding before approaching the turbine. While work is being conducted during icing or ice shredding conditions at least one crewmember will be designated to watch for shedding ice. Constant communication with the full team should be maintained. Supporting service vehicles should be parked a minimum of 60 feet away from the base of the turbine in a manner that does not require increased transport of personnel or materials through excessing snow or ice cover.

Additional safety stipulations regarding potential icing or ice shedding include:

- Approaching the turbine from behind the hub. This decreases the risk of being hit if ice falls from the hub.
- Conduct no work on top of the nacelle if ice is present on any of the exterior the walking surfaces.

- Delay any work in or on the towers until the ice has shed and/or there is no danger of ice shedding.
- If ice shedding occurs when personnel working inside of a turbine do not allow them to exit until ice shedding ceased.

5.8 Medical Emergencies

Emergency Medical Services (EMS) personnel or those individuals who are trained by a certified First Aid trainer will provide first aid until rescue personnel arrive. If an employee or contractor is injured or an accident has occurred on site and first aid is not a sufficient treatment, 911 must be called. The call to 911 can be made by phone by any available site personnel. The caller must state to the dispatch that they are at the “Grover Hill Wind Farm.” A second phone call will be made to the O&M Building, to inform others of the situation.

An automated external defibrillator (AED) and trauma bag is stored in the O&M Building and should be used, as necessary.

At least one employee (if available) should be sent to the site entrance to direct responding emergency services personnel to the appropriate location. When emergency services are responding, they will meet a Grover Hill representative at the entrance to the O&M Building. From there, the Grover Hill representative will escort the EMS personnel to the site of the medical emergency.

If the emergency requiring medical treatment to employees or contractors while working in a nacelle or tower, the Site Manager/Emergency Coordinator shall be contacted immediately. They will contact 911 and coordinate rendezvous points with the emergency rescue and/or ambulance service and site personnel. Rendezvous points shall generally be at the site of the injury. However, if Emergency Responders are unable to locate the site, the O&M building will serve as a rendezvous point. (Note: multiple site personnel may be required to lead both EMT first responders and then follow-on emergency vehicles to the injured location.). If the injured or ill employee/contractor is not capable of climbing down the tower, attending employees shall assess the situation, and respond according the appropriate action before lowering injured employees.

5.9 Hazardous Substance

The O&M building will maintain a comprehensive inventory of Spill Containment Equipment, Safety Data Sheets, and copies of the Project specific Spill Prevention, Control and Countermeasures (SPCC) Plan. Specific equipment and data sheets will be available at each separate work site, as defined by need and safety requirements. A separate SPCC plan will be developed to address spills in detail. Reference to that document is required for more detailed instructions regarding spill prevention and response.

In the event of a hazardous spill or exposure of potentially hazardous substance it will be important to execute the following actions:

- Determine the type of oil or hazardous substance involved in the spill
- Estimate the quantity of the spill
- Assess the Fire Risk
- Review the MSDS recommendations and considerations
- Inform Site Manager/Emergency Coordinator
- If determined to be safe, initiate efforts to contain the spill

Should the spill be too extensive or hazardous to be resolved using the available spill kit, the spill should be contained as much as safely possible and the site's environmental contractor should be contacted to resolve the situation.

The spill should be reported to the National Response Center (NRC) and The State:

NRC: 1-800-424-8802

State: See SPCC Plan for reporting requirements.

When reporting to the NRC and State the following information will be required:

- Identify the specific location of the spill
- Identify the substance involved
- Estimate the approximate quantity of spilled material
- Approximate concentration of the spilled material, if appropriate
- Identify the source of the spill
- Identify who is cleaning the spill
- Identify any resources damaged, if applicable
- Provide contact information
- Did the spill leave site/reach water

5.10 Biological, Radiological, Explosive, Chemical (BREC) Threat

A threat that a bomb/BREC has been planted at the Project site is usually made via telephone. In most cases, the threats have been proven false and no device or material was located. However, potential for loss of life and property is sufficient that each situation must be pursued and evaluated. A calm response to the bomb threat caller could result in obtaining additional information.

Anyone receiving such a threat via telephone, the individual answering the call should:

- Treat the caller with courtesy and respect. Complete a bomb threat report. Use this sheet as a reference while talking with the caller making the threat.
- Attempt to obtain as much information as possible.
- Ask for the exact location where threat has been or going to be planted.
- Attempt to keep the caller on the line by asking the caller to repeat the message.
- Record words spoken (as many words as possible) by the person.
- Get as much information as possible about the caller (i.e. vocal characteristics, sex, group affiliation, reason).
- Attempt to collect clues from background noises, which might indicate caller's location or area which call was placed.

Anyone receiving such a threat or suspicious package via mail, the individual answering the call should:

- Avoid handling the received materials to preserve possible fingerprint(s), handwriting or typewriting, paper, and postal marks. They may prove essential in tracing the threat and identifying the writer.
- Written messages are usually associated with generalized threats and extortion attempts, written warnings of a specific device may occasionally be received and should not be ignored.

- If a suspicious package or device is delivered or found at the facility, immediately notify the appropriate law enforcement authorities.
- Do not shake, open, or empty the contents of any suspicious package or envelope. Do not sniff, touch, taste, or look closely the item.
- Alert others in the area to the presence of the suspicious item,
- Place the package or envelope on a stable surface.
- Barrier tape should be used to mark the area where the suspicious items are by extending a continuous line of tape beginning immediately in front of the suspicious items and extending to just outside the room exit. This will also help guide local authorities to the suspicious item.
- Leave the area. Close any doors and assemble outside the room's entrance. Do not allow anyone to reenter the area.
- Wash hands with soap and water to prevent spreading potentially infectious material to face or skin.
- If possible, create a list of persons who were in the room or area when the suspicious letter or package was recognized and a list of persons who also may have handled it.

Immediately following the receipt of any such threat or suspicious package, notify the Grover Hill Site Manager/Emergency Coordinator by phone. Stop all radio transmissions from this point on until cleared by the Site manager/Emergency Coordinator or other competent authority. Radio transmissions can activate electronic detonating or timing devices.

The Site Manager/Emergency Coordinator will immediately notify 911. They will:

- Evaluate the threat and determine the appropriate course of action to take.
- Notify law enforcement and/or ambulance.
- Evacuate the facility, as necessary.
- Coordinate evacuation of any part of the surrounding community with local authorities as needed.
- Coordinate search of the site with proper authorities.

In the event of offsite impacts requiring community response, Grover Hill will contact local fire/police to make community notifications. The Site Manager/Emergency Coordinator or Lead Technician will coordinate any media efforts through the Grover Hill Asset Manager and Legal Department.

The Emergency Coordinator will ensure that the “All Clear” message is communicated once the threat has passed or is no longer present.

5.11 Criminal Activity

If you observe a crime in progress, behavior which you suspect is criminal or hostile behavior call 911 or appropriate number from emergency contact list. Report as much information as possible including:

- A description of the activity being witnessed.
- A description of the person's height, weight, gender, clothing, and any equipment or weapons observed.
- Provide detailed information regarding the location of the suspicious activity
- If the person is moving provide an indication of the direction of travel

- If the individual is in a vehicle make every attempt to determine or estimate the color, make, model and year of the vehicle. Write down the license plate information. Reference any distinguishing features of the vehicle (damage, multi-colored panels, after-market addition).
- Stay on the phone with the police dispatcher and provide additional information as changes in the situation occur until the first law enforcement officer arrives at your location.

DO NOT APPROACH OR ATTEMPT TO APPREHEND THE PERSON(S) INVOLVED.

6.0 Training Requirements

All personnel assigned to the Project will be trained on how to assist others in the proper evacuation of the building. Employees will be made aware of the existence and location of the site-specific Emergency Action Plan upon initiation of their employment on-site. The employees will participate in scheduled training activities.

7.0 Reference

29 CFR 1910.38

8.0 Attachments (to be completed prior to commencement of construction)

- 1- Map of Project Area and all Affiliated Infrastructure
- 2- Map of Evacuation Routes – Operation and Maintenance Building
- 3- Map of Evacuation Routes – Turbine Facilities
- 4- Map of Evacuation Routes – General Project Area
- 5- Map of Emergency Assembly Area
- 6- Emergency Contact List

This foregoing document was electronically filed with the Public Utilities

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Summary: Application - 27 of 40 (Exhibit T - Emergency Action Plan) electronically filed by Christine M.T. Pirik on behalf of Grover Hill Wind, LLC