



Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215
Office: 614.227.2300
Fax: 614.227.2390

Dylan F. Borchers
Direct Dial: 614.227.4914
dborchers@bricker.com
www.bricker.com
info@bricker.com

November 28, 2022

Via Electronic Filing

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

**Re: Clean Energy Future-Trumbull, LLC
Case No. 16-2444-EL-BGN and 22-223-EL-BGA**

Dear Ms. Troupe:

The October 5, 2017, Opinion, Order, and Certificate ("Certificate") approving Clean Energy Future-Trumbull, LLC Certificate of Environmental Compatibility and Public Need to Construct the Trumbull Energy Center approved a Stipulation which set forth a set of conditions as part of the Certificate. Within this set of conditions, Condition No. 24 requires that:

At least 30 days before the preconstruction conference, the Applicant shall submit to Staff for review and confirmation that it complies with this condition an emergency response plan to be used during construction.

In compliance with Condition No. 24, attached for filing is a copy of Trumbull Energy Center's Emergency Response Plan. If you have any questions please do not hesitate to contact me.

Sincerely,

Dylan F. Borchers

Attachment

Cc: Ashton Holderbaum (w/Attachment)

Gemma Power Systems



Trumbull Energy Center Emergency Response Plan

Lordstown Fire Department - (330) 824-2321

Lordstown Police Department - (330) 824-2545

Mercy Occupational Health Warren – 627 Eastland Ave SE Suite 102 Warren, OH 44484 – (330) 306 5030

Table of Contents

1.0	INTRODUCTION
1.1	Objectives
1.2	Scope
1.3	Development
1.4	Revisions
1.5	Distributions of the Plan
2.0	DESCRIPTION OF IMPLEMENTATION
2.1	Emergency Organization
2.2	Duties and Responsibilities of the Emergency Coordinator, Primary or Alternate
2.3	Duties and Responsibilities of Key Personnel
2.4	Command Center
2.5	External Communication and Media Guidelines
3.0	TRAINING REQUIREMENTS
3.1	General Training
3.2	New Employee Training
3.3	Emergency Response Team Training
4.0	EVACUATION PROCEDURE
4.1	General Procedures
4.2	Accountability Procedures
5.0	SEVERE WEATHER EMERGENCY PROCEDURE
5.1	General Procedures
5.2	Tornado and Hurricane Preparations
5.3	Earthquake Procedures
5.4	Lightning
5.5	After Severe Weather/High Water
6.0	BOMB THREAT PROCEDURE
7.0	THREAT OF VIOLENCE PROCEDURE
8.0	FIRE EMERGENCIES
9.0	LIMITED SITE ACCESS AND TRAFFIC CONTROL
10.0	OFF-SITE MEDICAL CARE PROCEDURES
11.0	HAZARDOUS SPILL RESPONSE
12.0	NOISE MITIGATION
13.0	UNINTENTIONAL RELEASE OF HIGH-PRESSURE NATURAL GAS

Appendix:

- A** – Site Assembly Areas
- B** – Bomb Threat Procedure Chart
- C** – Bomb Threat Report
- D** – Plan Holders and ERT Members
- E** – In-Network Medical Providers
- F** – ERP Signatory Page

1.0 INTRODUCTION

1.1 Objective

Safety is extremely important to Gemma Power Systems (“Gemma”), and Gemma believes that each site must be prepared for potential emergencies to protect employees, visitors, contractors, community, environment, and facilities from all such foreseeable events and to assist Facility personnel and outside emergency response entities. This Emergency Response Plan (“ERP” or “Plan”) has accordingly been developed to address different types of potential emergencies; emergency resources (equipment or personnel); levels of emergency response; principles to be applied during a response; detailed measures for initial response; containment, rescue, first aid and evacuation; termination of an emergency; notification procedures; drills and training; and the process for updating and modifying emergency procedures.

1.2 Scope

This Plan outlines procedures to be used during emergency situations that may be encountered on the Trumbull Energy Center (the “Project”) such as severe weather, bomb threat, threat of violence, fire, limited site access, traffic control, or hazardous spill response, in conjunction with training requirements, rescue, first aid, and evacuation procedures.

This Plan forms part of Gemma’s overall HSE Plan for the Project. This Plan further addresses the fire protection, detection, and alarm systems for use throughout the construction process and operation, including the classification of hazard areas, and provision of adequate fire water and other fire-fighting systems to address fire situations.

1.3 Development

This plan is based upon similar plans successfully utilized by Gemma at its other construction sites, modified or adjusted for the specific scope and conditions of this project.

Prior to mobilization Gemma will conduct the following activities in support of this project specific Emergency Response Plan:

- Survey the site and access routes to the Facility Site, including routes to occupational medical clinics, hospitals and emergency responders.

- Interview occupational medical clinics within the vicinity of the Facility Site and selected the clinic best suited for the Project based upon location, quality of care and commitment to injury management principles.
- Work closely with all local providers of emergency medical response services to address response times and capabilities of each responder. The assessment included capabilities to rescue from various heights and the equipment and means to affect such rescue.
- Survey local hospitals to verify services and other details as an occupation safeguard, including identifying the location of the nearest trauma center.
- Conduct initial visits with local law enforcement agencies. Further and periodic visits will be conducted before construction initiation and during the construction process to ensure familiarity of local authorities with the schedule, planned activities, and other relevant details. Gemma has further discussed arrangements for police details if needed for traffic control.
- Contract with a security firm to secure the Facility Site and construction materials.

1.4 Revisions

The Emergency Response Plan will be modified when required to reflect operation conditions, including a detailed review of procedures and resources to ensure appropriate measures are implemented.

When a revision is made to the Emergency Response Plan, the revised ERP will be sent to all key response personnel listed in Appendix D, they will be required to sign, date, and return Appendix F to the Site Safety Manager. These practices will ensure that personnel on the distribution list have a current copy of the plan in their possession.

1.5 Distribution of the Plan

The Site Safety Manager who is responsible for ensuring that all documents are current and available to appropriate personnel maintains the Emergency Response Plan. Any changes, revisions, or deletions will be made with the approval of the Corporate Safety Director who will sign and date such approval in Appendix F.

***Note:** Plan holders and key personnel are listed in **Appendix D**

***Note:** A list of names, telephone numbers and addresses of Gemmas' and Project subcontractors' key management personnel will be kept by the Gemma Site Safety Manager and for review and approval by the Project Manager.

***Note:** Gemma's Director of Safety or his designee has conducted interviews with local occupational medical center. See **Appendix E** for a listing of In-Network Medical Providers.

2.0 DESCRIPTION OF IMPLEMENTATION

2.1 Emergency Organization

2.1.1 The Project Manager, as the Primary Emergency Coordinator, is responsible for the implementation of the Gemma Power Emergency Response Plan and for its general operation in the event of an emergency.

2.1.2 The General Superintendent, in the absence of the Primary Emergency Coordinator or if immediate action requires, will take over the implementation of the Gemma Power Emergency Response Plan as the Alternate Emergency Coordinator.

2.1.3 The Assistant Project manager, in the absence of the Primary and Alternate Emergency Coordinators or if immediate action requires, will take over the implementation of the Gemma Power Emergency Response Plan as the Tertiary Emergency Coordinator.

2.1.3 The Emergency Coordinator, Primary or Alternate or Tertiary, will see that the efforts of the emergency personnel, both internal and external, are coordinated and directed toward the goal of terminating the state of emergency with minimum harm to people and property.

- The Emergency Coordinator has overall control over the emergency scene unless noted otherwise herein.
- It is the responsibility of the Emergency Coordinator to call off emergency efforts if the emergency is beyond the control or scope of employee training. The appropriate external parties will then be engaged.

2.1.4 If external parties are engaged, once on site, the local Fire Chief, or highest-ranking responder, shall assume command.

2.1.5 The activities of the emergency organization will be directed from the Command Center. If an outside emergency organization is in control, then activities will be directed from their command center.

2.1.6 The Emergency Coordinator will maintain liaison with the client site contact to facilitate emergency maintenance work such as cut-off and restoration of services.

2.2 Duties and Responsibilities of the Emergency Coordinator, Primary or Alternate:

- 2.2.1** The Emergency Coordinator has ultimate responsibility during an emergency situation and has the authority to commit the resources which Gemma has at its disposal necessary to carry out the Emergency Response Plan, unless authority is ceded to an external party.
- 2.2.2** The Emergency Coordinator works in conjunction with the members of the Gemma ERT and other Project emergency personnel to fulfill his duties.
- 2.2.3** If the Project has had an emission, discharge, fire, or explosion, which could threaten human health or the environment, the Gemma Site Safety Manager will notify the Project Manager, client site representative, and applicable local, state, and federal authorities
- 2.2.4** During an emergency, all reasonable measures must be taken to ensure that a fire, explosion, emission, or discharge does not occur, reoccur, or spread to other materials at the plant. These measures shall include:
- Stopping related or affected operations.
 - Ensure employees are protected from exposure to potential fire, explosion, emission, or discharge.
 - Collecting and containing released materials and wastes or arranging for the same.
 - Arranging for the proper removal or isolation of above containers.
- 2.2.5** Provide employee contact information as required. Notify the Gemma corporate office and client site representative immediately of any accident involving death, hospitalization of personnel, or severe property damage. Notify external agencies in accordance with requirements.

2.3 Duties and Responsibilities of Key Personnel

2.3.1 Project Manager

- Periodically reviews this plan and assigns plan holders and key personnel, as needed.
- Coordinates external and media communications with the Corporate Communications Director and the client Project Manager.

2.3.2 Site Safety Manager

- Accompany first responders.

- Provide sufficient emergency first aid and medical support until external aid can be secured.
- Monitor emergency area and restrict access to all non-essential personnel.
- Implement necessary steps to minimize accidental injury beyond that caused by the initial emergency.
- Notify the Corporate Safety Director.
- Arrange for escorts to accompany assigned representatives of the insurance carriers on their investigation of affected areas.
- Preparation of Loss Reports required.

2.3.3 General Superintendent

- Direct the safe shutdown of operations in the emergency area under the control of Gemma.
- Request fire, police, and medical, ambulance, and/or hospital services as requested by the Emergency Coordinator.
- Provide additional detailed information on Internal and External Communications are described in *Section 2.5*.

2.3.4 Assistant Project Manager

- Gather the findings from each trade at their assembly area and report findings to the Command Center.
- Supervise the assembly areas and do not allow employees to leave the area until notification is received from the Command Center.
- Keep roadways clear for first responder access.
- Provide employee contact information as required.

2.3.5 Corporate Communications Director

- Directing any communications including issuance to the client.

2.4 Command Center

- 2.4.1** The primary Command Center will be located in the Project's main office trailer and serves as the central gathering area for Key Personnel and Plan Holders.

2.4.2 All members of the Emergency Organization (ERT and Plan Holders on Project premises), excluding the Assistant Project Manager or Site Safety if occupied with first aid efforts, should report to the Command Center during an emergency.

2.4.3 The following equipment and supplies are maintained by Gemma at the Main Office Trailer (Command Center):

- Copy of the Emergency Response Plan
- Two-way radios
- Traffic warning vests
- Flashlights
- Emergency lights
- Employee Emergency Phone Lists
- Phone for outside calls
- Detailed maps of the facility

2.4.4 The Assistant Project Manager should report findings from the muster counts to the Command Center.

2.4.5 The Site Safety Manager should maintain radio communications with the Command Center during the emergency for information on emergency vehicle arrivals.

2.4.6 The Command Center will be the only source releasing information pertaining to the emergency to outside emergency response agencies.

2.4.7 Local Emergency Response Contacts

Lordstown Fire Department - (330) 824-2321

Lordstown Police Department - (330) 824-2545

911

In-Network Medical Provider – Mercy Occupational Health Warren – 627 Eastland Ave SE Suite 102 Warren, OH 44484 – (330) 306 5030

2.5 External Communications and Media Guidelines

2.5.1 If federal, state, and local emergency response personnel must be notified, the Gemma Project Site Safety Manager will make those notifications.

2.5.2 ***All information pertaining to the emergency will be channeled through the Command Center.***

2.5.3 Only client representatives, with permission from the client Project Manager, will escort news media personnel.

2.5.4 Employees will not give interviews to the media unless given permission by the client Project Manager and the Gemma Corporate Communications Director.

2.5.5 If employees are approached for information pertaining to the accident, they should refer the media to the client Project Manager. The following statement can be used in this instance:

“I’m sorry, but I do not have the information you need, please speak to a spokesperson for that information.”

3.0 TRAINING REQUIREMENTS

3.1 General Training

3.1.1 There are several training programs that teach employees how to respond to an emergency. These courses include instruction in emergency procedures, emergency equipment, and emergency systems. When required, and in addition to initial training, employees participate in annual review training programs. Training completion records are maintained onsite for all employees. When site conditions or emergency response procedures are significantly updated, Plan Holders will be retrained to this program.

3.1.2 Each craft holds daily safety meetings for all employees. During these meetings, safety and emergency response topics are reviewed and discussed as appropriate.

3.1.3 Periodic drills of the emergency procedures will be conducted at the request of the Corporate Safety Director. Drills will be conducted when site conditions change significantly, and at minimum yearly.

3.2 New Employee Training

3.2.2 All new employees receive initial training before beginning their work assignment. The training consists of the following elements:

- How to report an emergency
- A description of the Project Evacuation alarm
- Procedures to follow when alarm sounds
- Location of the evacuation assembly/muster areas
- Instructions to remain at the assembly area until told to leave by Headcount Coordinator (Assistant Project Manager)

3.3 Emergency Response Team Training

- 3.3.1** The on-site Emergency Response Team (the “ERT”) shall be made up of personnel that have specific training in areas that are necessary in emergency situations, including but not limited to high angle and confined space rescue techniques. Sufficient equipment, i.e cranes and manlifts of sufficient height to rescue employees from elevated work areas, will be kept on site when such activities are planned.
- 3.3.2** ERT training will at minimum exceed the requirements of OSHA’s confined space regulations. The training will also exceed the performance requirements of NFPA 1670 and 1006.
- 3.3.3** Local Emergency Response Teams; Ambulance, Fire, Rescue, Police, etc. will be called to the site when situations are beyond that of the training of the on-site ERT or when required by law.
- 3.3.4** The Lordstown Police Department and Lordstown Fire Department will be invited to the site periodically to review our site conditions and emergency response procedures, as well as to participate in drills. Familiarization of local authorities with the schedule, planned activities, and other relevant details will occur at such times as needed.

4.0 EVACUATION PLAN FOR PLANT PERSONNEL

4.1 General Procedures

- 4.1.1** The Emergency Coordinator will determine:
 - If the emergency area should be cleared, however
 - The Emergency Coordinator, or Alternate, have the authority to decide if the entire site should be evacuated.
- 4.1.2** Upon hearing the evacuation alarm, walk quickly to your assigned assembly area and report to your supervisor. Do not leave the area until directed by the Headcount Coordinator (Assistant Project Manager).
- 4.1.3** Evacuation supplies (high-visibility vests, flashlights, employee lists) are in the primary Command Center.
- 4.1.4** The Headcount Coordinator shall report their findings to the Command Center via radio or runner. Immediate notification must be made if anyone is missing to determine if a rescue is required.
- 4.1.5** The Emergency Coordinator must account for **all** personnel.
- 4.1.6** See attached *Appendix A* for a map of site Assembly areas.

4.2 Accountability Procedures

- 4.2.1 The Project will utilize a badge scanning system for project personnel entering and exiting the site each day. A report will be generated using the scan system and used for accountability verification. This report will be generated by the Project Safety Manager or his designee.
- 4.2.2 All visitors to the site will be required to sign in at the security gate.
- 4.2.3 Deliveries will be directed on where to go for unloading.
- 4.2.4 Visitors that are granted permission to enter the site will be given directions to the Gemma Main Office.
- 4.2.5 Once they arrive at the Gemma Main Office reception area, they will sign in on the Daily Site Roster and list who their Point of Contact (Escort) is.
- 4.2.6 The escort will be responsible for their visitor during their time on site, this would include safely accessing the assembly point in case of evacuation.
- 4.2.7 Prior to leaving the site, the visitor will sign out at the reception area and sign out with the security guard before leaving the project
- 4.2.8 The receptionist will keep the Daily Site Roster and use it in confirming accountability for all visitors during an evacuation.

5.0 SEVERE WEATHER EMERGENCY PROCEDURES

5.1 General Procedures

- 5.1.1 During severe weather, the Project Manager, General Superintendent, and Site Safety Manager have the authority to cease operations under Gemma's control at the site.
- 5.1.2 If the site is to be closed due to severe weather a message will be recorded on the voice mail of the project main office call-in number. The message will describe the action to be taken by the employees and the specific dates for the action.
- 5.1.3 If an external authority declares a **state of emergency**, employees should follow the instructions given by the authorities.

5.2 Tornado and Hurricane Preparations

Tornadoes and Hurricanes are common seasonal occurrences throughout the year. To minimize the damage, reduce personnel injury and to expedite recovery should a tornado strike the jobsite, the following procedures will be implemented.

- When temporary buildings/trailers are brought on the jobsite, they shall be properly anchored immediately.
- When erecting scaffolding that will be up during the hurricane period, all boards must be tied down or secured.
- Stored materials should be secured to the extent practical.

5.2.1 PREPARATIONS

In the event of a forecasted Tornado or Hurricane the following preparations will be completed, if feasible:

- Obtain a supply of tie-down and protection materials. Rope, tie wire, roofing felt, plywood, polyethylene, and screw anchors.
- Secure partially erected structures with cable or rope to a sufficient anchor point.
- Clean up area of all loose lightweight materials that could be windblown.
- Remove scaffold boards that are not tied down or secure.
- Secure all sump pumps and hoses to prepare for water removal, if necessary.
- Locate and retain portable generating equipment, as needed.
- Fill all gas and diesel tanks for portable generating and emergency response equipment. Be prepared to hand pump. Ensure all vehicles are fueled.
- Fill all other fuel storage tanks with a minimum of four feet of water of ballast.
- Know the evacuation route. Follow the posted EVACUATION ROUTE signs and listen to announcements on the radio for evacuation procedures.
- Remove all construction equipment from low areas that may get flooded. Tie down all portable buildings, porta-cans, paint shacks, etc.
- Lower booms of all cranes, cherry pickers, boom trucks, etc., to their lowest position and secure to a permanent structure.
- Roll up all welding leads and torches.

- Make final cleanup of area.
 - Check to see that all underground piping is protected against flotation.
 - Secure all drawings, files, etc. Provide water/wind protection in case of roof or window damage. Store all calculators, typewriters, etc. Cover all printing equipment and print paper. Remove all vital records, payroll, cash payment journals, permit compliance logs, etc., and move to safe storage. Protect and seal data processing equipment.
 - Release employees on a rotating basis to take precautions at home.
 - Prior to leaving the jobsite, turn off power at main switches.
- *Note:** The Emergency Coordinator will communicate with subcontractors to establish an orderly and timely evacuation.
- In the event that all phone systems will be out of service, employees should tune to local radio or local cablevision for work instructions.

5.2.3 Severe Weather Watch

When a severe weather watch (forecast) is announced, severe weather is expected in or near your areas. Keep jobsite radio turned to a local station for information and advice from local government and weather service. Also, keep watching the sky for an approaching funnel-shaped cloud.

***Note:** The Project Manager has the authority to call off work for the Project in the event of serious weather concerns.

5.2.4 Severe Weather Warning

A severe weather warning means that there is severe weather in the immediate area. Actions should be taken to protect employees from being injured by falling objects, flying debris, and other weather hazards. If necessary, have the employees assemble in an interior hallway. Employees should be instructed to take the following steps in case they are out in the open during severe storm activity.

- If there isn't time to relocate safely away from the storm, or if the employee is walking, he/she should take cover and lie flat in the nearest depression, such as a ditch, culvert, excavation or ravine.

***Note:** The Project Manager has the authority to call off work for the Project in the event of serious weather concerns.

5.4 Lightning

When there is a potential for lightning; field employees will pay extra attention for visible lightning and let their supervisor know if they witness any lightning in the area, office employees shall use computerized systems (WeatherBug, Weather Sentry, etc.) to forewarn of lightning when possible.

- At twenty (20) miles, a verbal notification will be announced that lightning has breached the 20-mile mark along with the anticipated direction. If the lightning is headed in the direction of the site, then elevated workers should prepare for the possibility of exiting their work area to seek shelter (no new work should start where it would be difficult to exit if needed; confined space, elevated work, etc.)
- At ten (10) miles all work shall stop, and employees must seek shelter in an approved area. All permits are canceled; confined space, hot work, etc.
- Following a period of twenty (20) minutes, with no lightning within 10 miles, GPS management will give an 'all clear' to proceed back to work
- At this point, all work locations will be inspected for new hazards and if the suspension of work exceeds 1 hour all permits must be re-verified.

5.5 After Severe Weather/High Water

- Only clean-up crews, medical attendants, and authorized supervisory personnel should be allowed at the disaster area. The presence of unnecessary personnel will only hamper rescue and other emergency operations.
- Do not handle live electrical equipment in wet areas. Electrical equipment should be checked and dried before start-up.
- Use battery-powered lanterns or flashlights, not oil or gas lanterns or torches, to examine buildings. Flammables may be inside as an aftermath of the extreme weather.
- Report broken utility lines to local police, fire, or other appropriate authorities.
- Keep tuned to radio or television stations for advice and instructions of your local government or where to obtain medical care and assistance for housing, clothing, and food.
- Stay out of any affected areas until entry is authorized by the Emergency Coordinator.

6.0 BOMB THREAT PROCEDURE

DO NOT POST THIS PROCEDURE ON A BULLETIN BOARD

Appendix B – Bomb Threat Procedure Chart can be found attached.

Appendix C – Bomb Threat Report can be found attached.

6.1 If a bomb threat by the phone is received, the following steps are to be taken. Note the following information carefully:

- Exact time of call
- Background noise such as vehicles, bar room sounds, etc.
- Voice characteristics, male, female, accent, etc.

6.2 Without overly interrupting, attempt to gain the following information from the caller. Some “bombers” are quite ready to provide such information, which would prove invaluable.

- When will the bomb go off?
- Where is it located?
- What kind of bomb is it?
- How big is it?
- How can we identify it?
- What kind of container is it enclosed in?

After receiving the call, immediately notify the Emergency Coordinator.

6.3 The person receiving the bomb threat phone call should proceed to assembly area and give the bomb threat information to the Emergency Coordinator who will proceed to the Command Center. If the bomb is in the Command Center, the Emergency Coordinator will notify the Plan Holders and ERT of such and meet at the Alternate Command Center at the Receiving Trailer.

6.4 The Emergency Coordinator, or alternate, shall dial **911** on from the project site phone system and provide as much information as possible such as:

- Location of bomb, if known
- Date & time of call
- Detonation time

- Description of what the caller said, etc.

6.5 The person receiving the phone call should complete the attached BOMB THREAT REPORT.

7.0 THREAT OF VIOLENCE PROCEDURE

7.1 Intruder- If an intruder is observed entering the site that appears to have malicious intent towards personnel or property, the employees should;

7.1.1 Stay clear of the intruder, do not confront them.

7.1.2 Alert other personnel in the area.

7.1.3 Notify the Site Safety Manager along with security immediately.

7.1.4 Utilize the Run, Hide, Fight techniques as described by your site safety training.

8.0 FIRE EMERGENCIES

8.1 General Procedures

8.1.1 When a fire is observed, the observer should immediately notify a Supervisor and any endangered personnel. Only trained employees shall attempt to extinguish the fire.

8.1.2 The observer shall report ALL fires to the Site Safety Manager via project radio or other reliable form of communication.

8.1.3 An alarm will be sounded to announce fire emergencies. If the fire is extinguished, or if it was a false alarm, the Emergency Coordinator will announce all clear to affected areas.

8.1.4 **DEFINITION OF FIRE EMERGENCY:** If the fire is uncontrollable, a fire, which cannot be extinguished with two, portable fire extinguishers, the Site Safety Manager should be notified so an evacuation alarm can be sounded.

8.1.5 The Safety Manager shall call the Security Gate and give the following information:

“I have notified the local authorities of an Emergency and am expecting the emergency equipment at... *location in plant.*” “I can be reached at”

- 8.1.6** The Project Manager, as the Primary Emergency Coordinator, is responsible for the implementation of the Emergency Response Plan and for its general operation in the event of a plant emergency.
- 8.1.7** The General Superintendent, in the absence of the Primary Emergency Coordinator, or when immediate action is required, will take over the implementation of the Emergency Response Plan as the Alternate Emergency Coordinator.
- 8.1.8** Headcounts from the assembly area shall be reported to the Command Center. All personnel must be accounted for.
- 8.1.9** Requests for information from the media/public should be referred to client management.
- 8.1.10** Gemma will make use of 20LB type ABC fire extinguishers located within 20 feet of travel of any hot work activities and a maximum of 50 feet of travel from any flammable storage areas. Alternatively, CO2 extinguishers will be located around equipment deemed sensitive to type ABC extinguishant.
- 8.1.12** At least one week prior to natural gas being introduced to the Project, the Project will employ Gemma's hot work program for all hot work activities in conjunction with %LEL detecting air monitors to minimize potential hazards.

9.0 LIMITED SITE ACCESS AND TRAFFIC CONTROL

- 9.1** The Project has limited site access with one vehicle entrance/exit and no emergency exit road.
- 9.2** The site or adjacent laydown area will have a suitable helipad area to accommodate aerial evacuation via helicopter to the hospital if necessary.
- 9.3** In the event of a heavy haul road blockage during an incident that requires external emergency responders, the General Superintendent will direct the external responders as to the best way to access the site. The General Superintendent will also direct the heavy haul to move to a suitable pull-off area.
- 9.4** When work encroaches upon or is close to traveled roadways, traffic control measures will be used in accordance with the authorizing agency, and following state or federal standards for uniform traffic control signs and devices as published by the Department of Transportation.
- 9.5** If it becomes necessary to delay, detour or otherwise inconvenience the public, every effort will be made to do so as courteously and safely as possible.
- 9.6** Barricades, warning, and direction signs of sufficient size and number will be placed at appropriate locations to warn the public of lane closures and other

traffic control measures.

- 9.7** The condition of traffic control devices will be monitored continuously to insure their proper operation.
- 9.8** Traffic control devices should be removed or covered upon completion of the work protected by such devices.
- 9.9** Personnel on foot who are exposed to mobile equipment or motor vehicle traffic WILL wear high visibility vests or other equivalent high visibility warning apparel. During the hours of darkness warning apparel must be reflective with at least one horizontal stripe that completely surrounds the wearer.
- 9.10** Gemma may also contract limited police service and/or a private traffic control provider as needed.

10.0 OFF-SITE MEDICAL CARE PROCEDURES

In the event of a serious incident which requires the employee to be taken off-site to receive medical care the following steps will occur:

- 10.1** The Site Safety Manager or Project Manager will immediately call the GPS Director of Safety after appropriate medical attention has been arranged. (Mike Bennett, Cell: 724-388-0218, Office: 860-659-0509 ext1119). See **Appendix E** for a listing of In-Network Medical Providers.
- 10.2** The Site Safety Manager will be responsible for interfacing with the treating physician and collecting the following information pertaining to the injured employee:
 - Name
 - Date of Birth
 - Address
 - Telephone Number
 - Date of Hire/Length of Employment
 - Occupation
 - Marital Status
 - Time and Date of Injury
 - Description of Incident
 - Witness Names and Contact Numbers
 - Name and Phone Number of the Treating Medical Facility
- 10.3** The Site Safety Manager will call Travelers Telephone Claim Report Line at 1-800-238-6225 and give them our Policy information.
- 10.4** Policy Number: DTEUB977K761719 (Replace the last two digits with those of the current year)
- 10.5** Your name, location and telephone number

- 10.6** Tell them that Mike Bennett will be the contact person and give the main office number and address as the place for correspondence to be sent.
- 10.7** The representative will give a claim number which you should document and email to Mike Bennett.
- 10.8** Complete the incident investigation and report as mandated in Gemma Power System's Incident Reporting Policy.

11.0 HAZARDOUS SPILL RESPONSE

Following a spill, the source of the spill shall be located and the Supervisor responsible shall take immediate corrective action to contain it, The responsible Supervisor shall immediately notify the Safety Manager, The Safety Manager will notify the client of all hazardous or non-hazardous releases regardless of size and/or environmental impact. The Safety Manager will complete a spill report and forward the report to client Management.

- 11.1** Containment and Clean-up Operations are as follows:
- 11.2** Gemma Power field employees shall have the responsibility for initial and/or temporary containment/clean-up of all incidental and minor spills,
- 11.3** All containment/clean-up operations performed by Gemma Power and/or Subcontractors, shall be directed and supervised by the Gemma Power Safety Manager
- 11.4** In the absence of the Safety Manager, any such operations will be directed and supervised by the designated competent person,
- 11.5** The Safety Manager or competent person should be contacted immediately to determine if the containment/clean-up operation is/is not regulated under 29 CFR 1910.120,
- 11.6** All hazardous waste operations that fall under 29 CFR 1910.120 will be contracted to a qualified hazardous waste cleanup company through coordination with the Site Safety Manager

12.0 NOISE MITIGATION

Construction noise is expected to be typical of the construction of similar industrial and power generating facilities. Nighttime construction is expected to be limited and the construction activities are expected to be focused during the daytime hours. Typical construction schedule is expected to occur during the weekdays; however, construction work may continue over the weekend to finish an ongoing activity. Blasting activities are not anticipated. Construction noise is typically worse during the pile driving operations of

the project; however, in this case auger cast piles will be utilized. Auger cast pile installation is much quieter in comparison to the noisy impact hammer pile driver operation.

13.0 UNINTENTIONAL RELEASE OF HIGH-PRESSURE NATURAL GAS

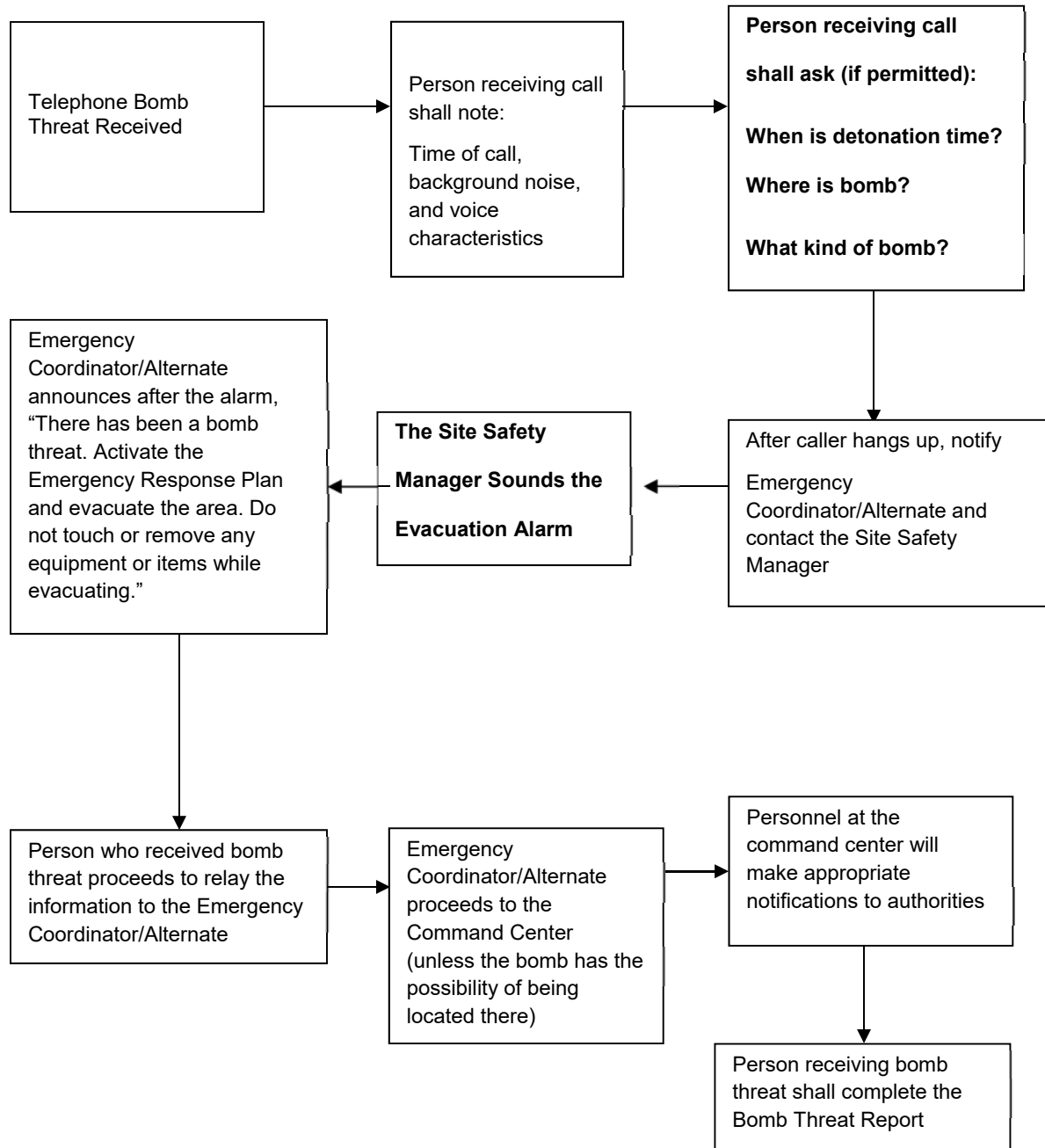
13.1 In the event of a release, all work shall cease, and employees will follow evacuation protocols.

13.2 The gas company, Dominion East Ohio, shall be contacted (info) and site response shall be at their direction.

13.2.1 Dominion East Ohio
6500 Hampsher Rd
Clinton, OH 44216
330-497-5103

Appendix A: Site Assembly Areas - TBD

Appendix B: BOMB THREAT PROCEDURE CHART



Appendix C: BOMB THREAT REPORT

Date _____	Start Time _____	End Time _____	(AM or PM)
Call answered by _____	Phone number called _____		
Questions you should ask			
Time bomb is set to explode? _____			
Where is it located? Floor _____ Area _____			
What kind of bomb is it? _____			
What does it look like? _____			
Why do you want to injure people? _____			
Voice Description			
Male _____	Female _____	Nervous _____	Slow _____
Loud _____	Emotional _____	Angry _____	Frantic _____
Refined _____	Young _____	Rough _____	Raspy _____
Other _____			
Accent Description _____			
Unusual Phrases _____			
Recognize voice?	Yes _____	No _____	
Background noises			
Music _____	Traffic _____	Motors _____	Airplane _____
Bells _____	Whistles _____	Horns _____	Machinery _____
People _____	Other _____		
Additional information			
Did the caller indicate any knowledge of the project? _____			
Was the caller employed by the company? _____			
Did you know the caller personally? _____			

Appendix D – Plan Holders and Key Personnel

Plan Holders:

<u>Plan Number</u>	<u>Holder of the Plan</u>	<u>Name and Contact Info</u>
1	Director of Safety	Mike Bennett (724) 388-0218
2	Director of Projects	Tracy Sutton (860) 682-0845
3	General Superintendent	Sean Andrews (813) 848-4886
4	Project Manager	Ian Ivanoff (860) 819-4606
5	Assistant Project Manager	TBD
6	Civil Superintendent	Paul Herlihy (860) 992-9971
7	Mechanical Superintendent	TBD
8	Electrical Superintendent	TBD
9	Site Safety Manager	TBD
10	Corporate Communications	TBD

Key Personnel:

Owner's On-Site Representative:

TBD

Rescue Team Members:

TBD

Receptionist:

TBD

Security Guard Company:

TBD

APPENDIX E


In-Network Medical Providers for Trumbull Energy Center

Provider Name	Type of Facility	Address	Phone Number	Distance from Project
Mercy Occupational Health Warren	Occupational Medicine Clinic	627 Eastland Ave SE Suite 102 Warren, OH 44484	330-306-5030	~3.5
WellNow Urgent Care	Urgent Care Clinic	1997 Niles Cortland Rd SE Warren, OH 44484	330-505-4900	~2
Steward Trumbull Memorial Hospital	Hospital: General Acute Care	1350 E Market St Warren, OH 44483	330-841-9011	~4.5

Appendix F – ERP Signatory Page

Current Revision: 3

Director of Safety review and approval:

Signature:  Date: 8/10/2022

Plan Holders, and Key Personnel:

I have read and understand the current revision of the ERP, and will be able to conduct all aspects pertaining to my role.

Signature: _____ Date: _____

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on
11/28/2022 2:36:36 PM**

in

Case No(s). 16-2444-EL-BGN, 22-0223-EL-BGA

Summary: Notice of Compliance with Condition No. 24 - Trumbull Energy Center's
Emergency Response Plan electronically filed by Teresa Orahood on behalf of
Dylan F. Borchers