

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

February 6, 2023

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. 22-697-EL-BLN

Dear Ms. Troupe:

On August 9, 2022, the Ohio Power Siting Board ("OPSB") Staff issued a Report of Investigation approving the Letter of Notification. Clean Energy Future—Trumbull, LLC held a preconstruction meeting with Staff on January 20, 2023 for the purpose of commencing construction for the switchyard and electrical interconnection line. The attached preconstruction agenda was submitted to Staff prior to the January 20, 2023 meeting. In addition, the attachment contains the presentation to OPSB Staff during the preconstruction conference, providing additional details of the construction activities and compliance with certificate conditions.

The project will be commencing construction activities on or around February 13, 2023. If you have any questions please do not hesitate to contact me.

Sincerely,

Dylan F. Borchers

Attachment

Cc: Ashton Holderbaum (w/Attachment)

ELECTRICAL CONSTRUCTION SERVICES M. J. ELECTRIC, LLC

Trumbull Energy Center

- Ohio Power Siting Board (OPSB)
- **Pre-Construction Conference**
- Construction



































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Welcome & Introductions

- **OPSB Representatives**
- **CEF-T Representatives**
- M. J. Electric/Realtime Utility Engineers
- City of Warren















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A QUANTA SERVICES COMPANY

Agenda

- Introductions
- Safety Moment
 - Project Team Overview
- Project Phases
- Switch Yard Collector Yard
 - Lead Line
- Certificate Condition Requirements
- Prior to Construction
 - During Construction

- Lines of Communication
- Erik Peterson 906- 221-6611
 - Chase LaFave 906-310-248
- **Questions?**















Safety Moment







































Safety Moment























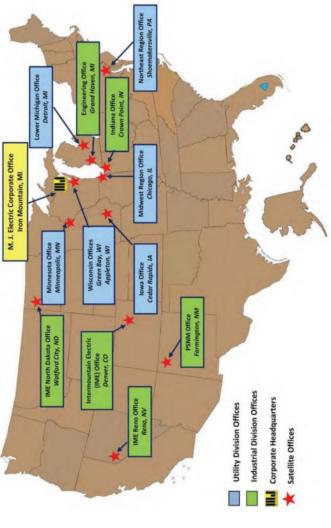




M. J. Electric, LLC

foundation construction services that increase the security, reliability, and capacity of our nation's infrastructure. Our customers experience the benefit of our local presence with a national reach. M. J. Electric, LLC invests in and fosters trusting relationships as we safely deliver electric transmission, substation, distribution, renewable energy, power, industrial, and concrete

Founded on integrity, we are committed to raise our industry's expectation for safety, quality, and project execution.



INVESTED INSPIRED INTEGRITY























Realtime Utility Engineers

Vision - Mission - Values

Vision:

Realtime's vision is to be the "best in class" provider of engineering services in the electric power industry.

Mission

Realtime's mission is to excel at understanding and meeting the needs of our clients, our employees, and our stockholders.

For our clients, we will provide engineering services, solutions, and designs that:

- utilize the latest, proven, advances in technology
- are of the highest level of quality and accuracy
- exceed our client's expectations for responsiveness, communication, and delivery

For our employees, we will manage an engineering organization that:

REALTIME Utility Engineers

ENGINEERING TOMORROW'S POWER - TODAY

- adheres to safe operating practices
- creates opportunity for professional development and growth

For our stockholders, we will operate and grow our business that:

- is profitable and grows revenue year after year
- adheres to, and supports, the goals of our clients and our parent company, Quanta Service

Values

- Realtime is driven to meet the needs of our customers.
- We understand the needs of our customers and deliver superior services to meet those needs.
- Realtime employees respect each other, respect all of the employees across Quanta, and work together as a team in
- As a team, we pursue and achieve excellence in everything we do.
- We uphold the highest level of ethical standards, honesty, and integrity in everything we do and with everyone we interact with in the course of serving our clients and operating our business.























Current Conditions

Tree clearing is expected to be completed February 2022









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Road Access



















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Traffic Management



Site Specific Access Plans

- Switch Yard
- **Collector Yard**
- Lead Line

Traffic Management

Trumbull Energy

Renewable Energy Industrial Distribution

nstrumentation

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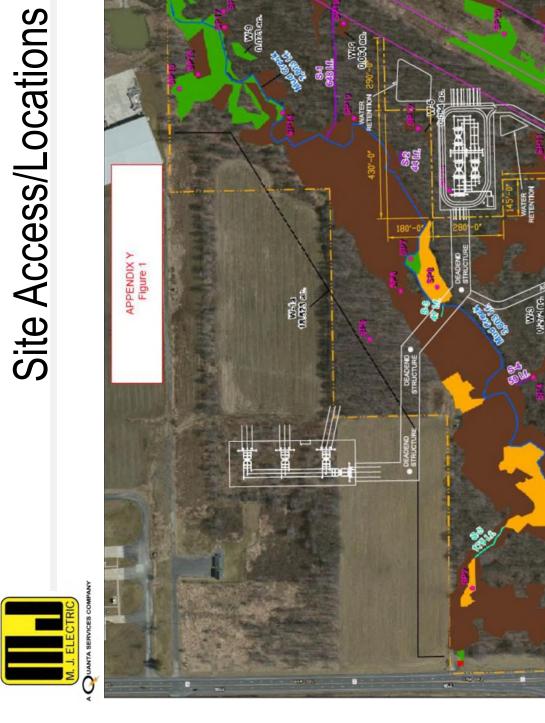


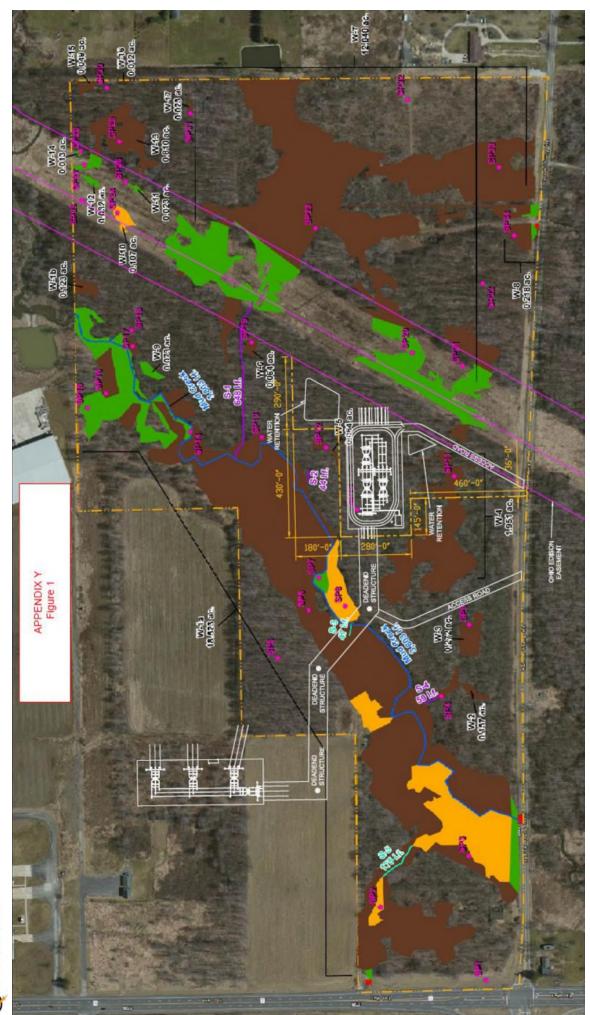






















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Erosion and Sediment Control



- Once a week
- After a rain event of more than ½"

Endangered Species

Report if encountered

Spill Plan

- Will be reported promptly
- Will be fully cleaned-up to fulfill requirements

SWPPP Plan

Trumbull Energy Center

enewable Energ **MJE Drilling**

Industrial

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Vegetation Management

- All activities will be conventional tools performed with
- Plan will take effect after the construction of the transmission line is completed

Management Plan Vegetation

rumbull Energy Center

Renewable Energy

Distribution Industrial

Storm Response Instrumentation **MJE Drilling**

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Construction Phases

Switch Yard

- Site Development/Earthwork
- Foundations
- **Below Grade**
- Above Grade
- Testing & Commissioning

Collector Yard

- Site Development/Earthwork
- Foundations
- **Below Grade**

- Above Grade
- Testing & Commissioning

Lead Line

- Road Development/Earthwork

Foundations

- Poles
- Wire













Safety

RULES TO LIVE BY

Our Vision is to be an injury-free workplace. The "Rules Io Live By" are a fundamental building block for achieving our vision and are embraced as a core company value. The rules focus on critical areas of safety controls, and if neglected have the potential to cause serious injury or death to employees, customers, vendors or members of the public.

Our Goal is to create an environment where there is no tolerance for willfully bypassing or ignoring any Safety Policy and where each employee is taking every step to ensure their safety and the safety of all their co-workers.

the "Rules To Live By" are practiced every time. understand, support, and 'speak up' to ensure We ask that every M. J. Electric employee

Non-compliance with the 10 listed itemsALE policies below could have serious consequences to employee so and the public. Including allumities, M. J. Electric will take action for those that choose to employee so and the public. Ourse by, "including disciplinary action up to end including dismissel."

- The Testing and Grounding of Every Line We Work On
- 2. Rubber Gloves and Sleeves Policy
- 3. LOTO (Lock Out Tag Out Policy)
- 4. FR Clothing Policy
- 5. Fall Protection Policy
- following MJE's Excavation Policy 6. Entering an Excavation without
- 7. Entering a Confined Space without following MJE's Confined Space Policy
- 8. Vehicle Usage Policy
- 9. MJE's Substance Abuse Policy
- 10. Being Under the Influence of Drugs or Alcohol



Everyone Goes Home Safely Every Day safe work place and to ensure that Our commitment is to provide a







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Emergency Response

Emergency Contacts

Emergency Policies & Procedures

Emergency Action Plan

Trumbull Energy Center

December 2022

Instrumentation Storm Response

Renewable Energy

MJE Drilling

Substation Industrial Distribution

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Complaint Resolution

Contact Plan

Procedure

Complaint Form

Resolution Procedure Complaint

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Instrumentation Storm Response

Renewable Energy Industrial Distribution

Substation

MJE Drilling

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OPSB Certificate Conditions

Prior to Construction

- Condition 1
- Prior to the commencement of construction activities in areas that require permits or authorizations violation received by the applicant from the permitting agency shall be provided on the case docket by federal or state laws and regulations, the Applicant shall obtain and comply with such permits or supporting documentation, on the case docket prior to commencement of construction. Any permit authorizations. The applicant shall provide copies of permits and authorizations, including all within seven days of receipt.









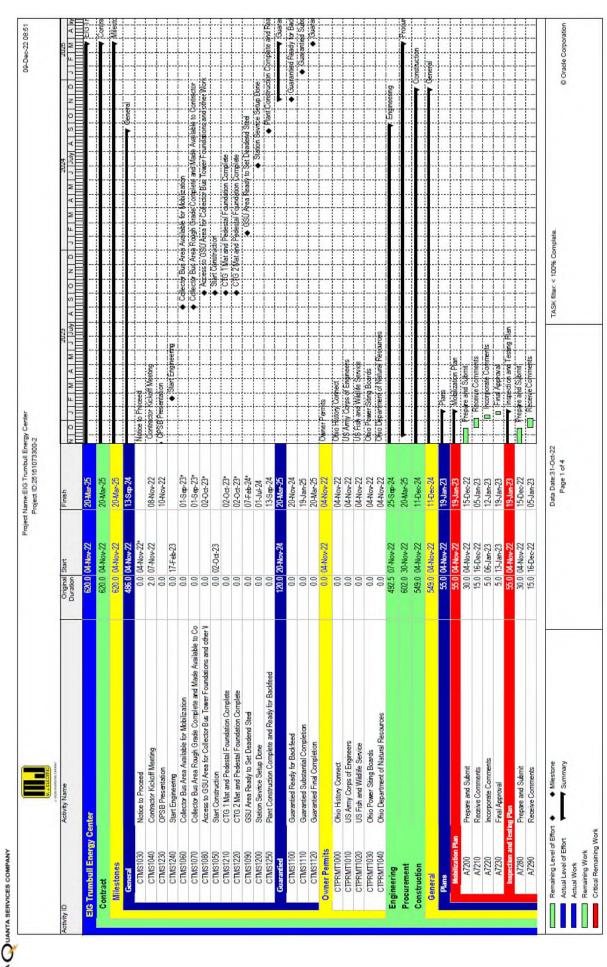








Schedule









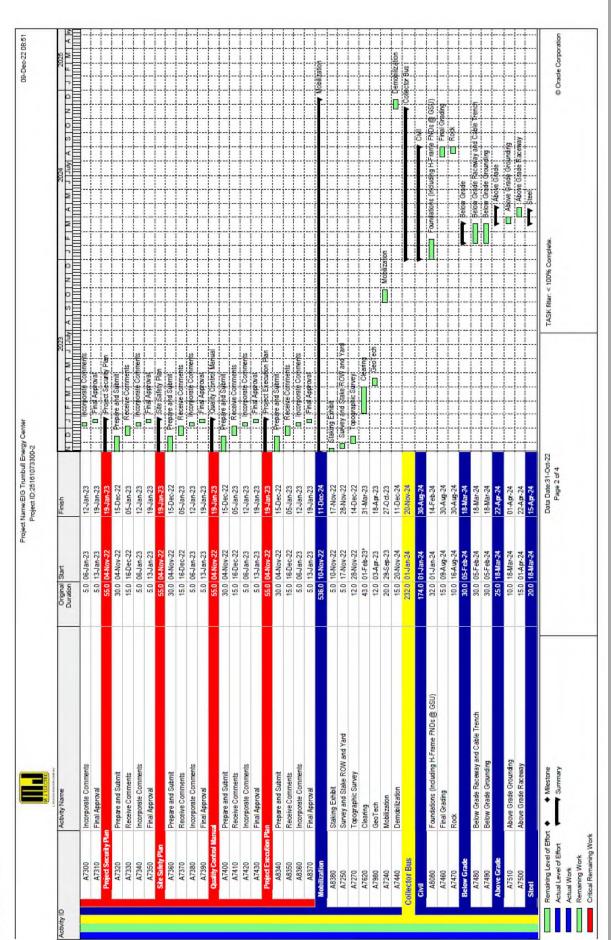






QUANTA SERVICES COMPANY

Schedule





















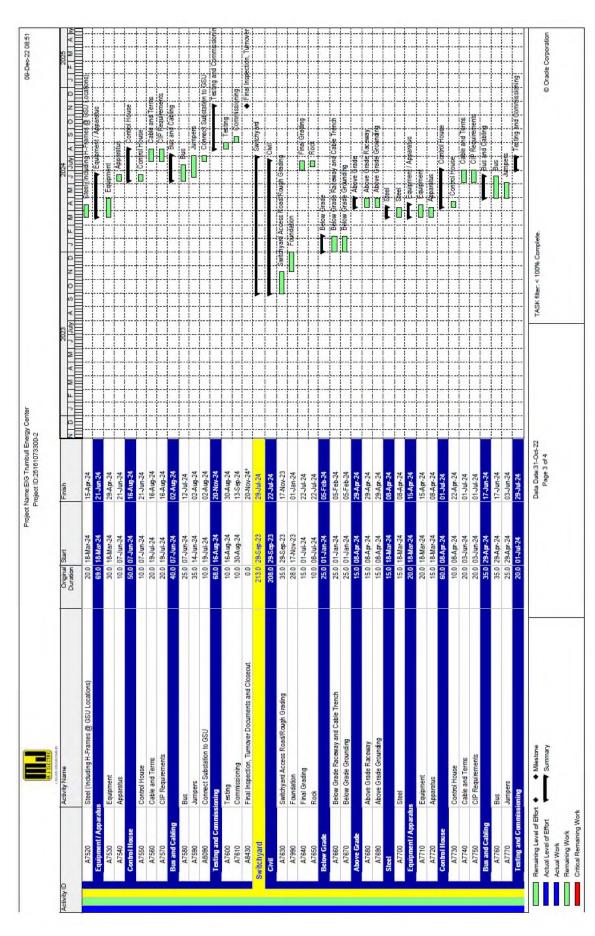






Schedule

	CTRI	





















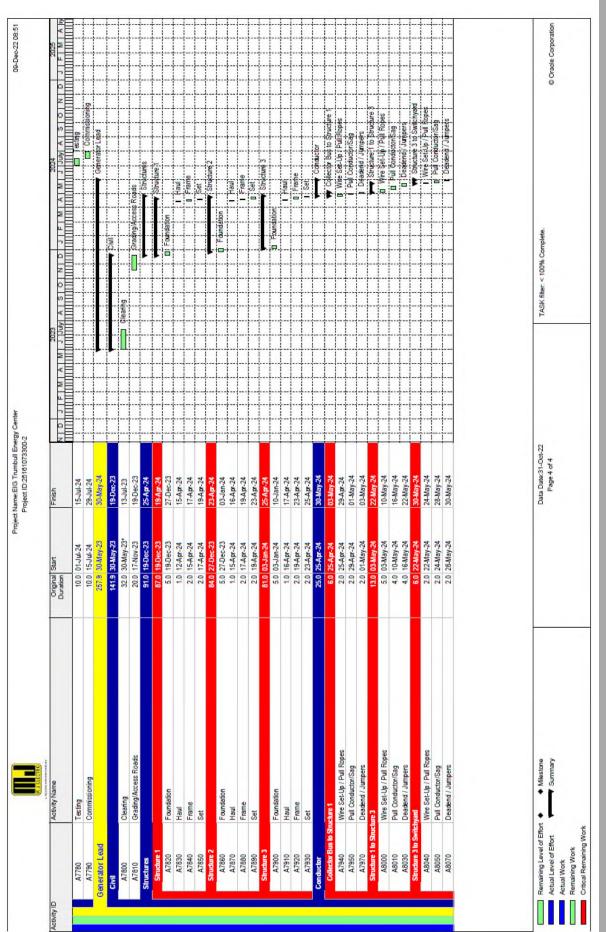






A QUANTA SERVICES COMPANY

Schedule





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OPSB Certificate Conditions

During Construction

- Condition 2
- Coordinate with U.S Fish & Wildlife Service, Ohio Department of Natural Resources, and staff to assure impacts to bat species are minimized
- Condition 3
- Construction Hour Limitations
- 7 AM 7 PM or until Dusk when sunset occurs after 7 PM
- Impact pile driving, Hoe ram, and blasting operations, if required, shall be limited to the hours of 10 AM to 5PM Monday through Friday
 - Construction activities that do not involve noise increases above ambient levels at sensitive receptors are permitted outside of daylight hours when necessary
- Condition
- Applicant Shall not conduct mechanized clearing or stump removal within 25 feet of any stream or



















Communication

Andy Hoffman – Operations Manager

906-282-4962

ahoffman@mjelectric.com

Chase LaFave— Senior Project Manager

248-310-9430

cclafave@mjelectric.com

Erik Peterson – EPC Project Manager

906-221-6611

epeterson@mjelectric.com





















Trumbull Energy Center

Thank You!

Questions?

Safe Travels

























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Transmission

Power Generation

Substation

Industrial

Distribution

Renewable Energy

MJE Drilling

Instrumentation

Storm Response





Trumbull Energy Center

Locations

- ï Switch Yard
 - 1500 Hallock Young Rd, Warren, OH 44481

Contacts

- ï Chase LaFave Senior Project Manager
 - o Cell: 248-310-9430
 - o Email: cclafave@mjelectric.com
- i Andy Hoffman Operations Manager
 - o Cell: 906-282-4962
 - o Email: ahoffman@mjelectric.com
- ï Erik Peterson EPC Project Manager
 - o Cell: 906-221-6611
 - o Email: epeterson@mjelectric.com
- ï Chris Patterson –Superintendent
 - o Cell: 906-221-3575
 - Email: cpatterson@mjelectric.com
- i Gerald Lipowski Construction Manager
 - o Cell: 906-282-4900
 - Email: glipowski@mjelectric.com
- ï Mark Phillips Safety Representative
 - o Cell: 248-840-1421
 - Email: mphillips@mjelectric.com



Road Coordination

Access from I-80 to Job Locations:

From I-80 (Ohio Turnpike) Southbound to Switch Yard

While traveling southbound on I-80, take exit 215 to exit toll road. Continue straight through the intersection onto Hallock Young Rd. Follow Hallock Young Rd and you will come to the gravel drive to the site. There will be signage at the start of the gravel road indicating the site and where to go.

From I-80 (Ohio Turnpike) Southbound to Collector Yard

While traveling southbound on I-80, take exit 215 to exit toll road. Continue straight through the intersection onto Hallock Young Rd. Follow Hallock Young Rd for approximately 2 miles to the intersection of Hallock Young Rd and Tod Ave. Turn left onto Tod Ave and head north approximately .25 miles where the entrance to the site will be located on the right.





Site Specific Access Plans:

Switch Yard

i Site Access

- There will be signs off of Hallock Young Rd showing the entrance drive to the site location.
- Follow the gravel drive approximately 0.30 miles to the switch yard access drive.
- At the end of the switch yard access drive there will be a fence gate.

ï Site Layout & Storage

- Material storage areas will be along the north fence line and south fence line. Along with multiple connex boxes along the east fence line.
- Once you enter the west gate, the job trailer will be along the west fence.
- The porta john's will be adjacent to the job trailer.
- Bulk fuel tank will be in the south east corner of the yard. It will be properly barricaded with concrete jersey barricades.
- Site parking will be on the west fence line near the job trailer.

Ϊ

ï Traffic Flow

There will be personal vehicle use by employees on Hallock Young Rd around 7am and 5:30pm every day. Employees will be informed of the proper speed limit of that road

Signage

Contractor will implement signs to clearly mark the entrance of site locations. Signage will also identify the site office and parking areas for all personnel, visitors, and emergency vehicles.

Speed Limit

While on the road ways obey all posted, local, state and federal laws pertaining to the driver and vehicle. Within the job area follow their posted speed limit signs (10mph).

Parking

Employees must park in the designated employee parking areas.

Deliveries

All deliveries must call General Foreman 1hr prior to delivery. Deliveries must stop at designated point of all job sites and cannot precede any farther without the permission of the General Foreman.



SWPPP Plan

Trumbull Energy Center

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FINAL GEOTECHNICAL SUBSURFACE INVESTIGATION PROPOSED TRUMBULL ENERGY PROJECT LORDSTOWN, OHIO

FOR

FLUOR CONSTRUCTORS INTERNATIONAL, INC. 3 POLARIS WAY ALISO VIEJO, CALIFORNIA 92698

SUBMITTED

FEBRUARY 28, 2017 TTL PROJECT NO. 14837.02

TTL ASSOCIATES, INC.
1915 NORTH 12TH STREET
TOLEDO, OHIO 43604
(419) 324-2222
(419) 321-6257 fax



EXECUTIVE SUMMARY

This geotechnical subsurface investigation report has been prepared for the Trumbull Energy Project, a proposed gas-fired electrical generating plant to be constructed in Lordstown, Ohio. The site is approximately 21 acres in size, with a rectangular shaped footprint encompassing roughly 1,200 feet by 800 feet of laydown area for the Lordstown Energy Center under construction at the time of our investigation. This investigation included 14 test borings, 4 Cone Penetration Test (CPT) soundings, 3 downhole seismic CPT (SCPT) soundings, 5 test pits, 4 field electrical resistivity tests, and one field percolation test, laboratory testing, and engineering evaluations for foundations for the proposed facility.

- 1. The site is bounded by Lordstown Energy Center and Henn Parkway to the north, commercial development to the northeast, a wooded area and Mud Creek to the east and south, a former agricultural area to the southwest (currently being utilized as construction parking and temporary fill mound placement), a former residence to the west, and a commercial development to the northwest, with Tod Avenue (State Route 45) further to the west.
- 2. The surface materials consisted of crushed stone, with topsoil encountered in one boring.
- 3. Based on the results of our field and laboratory tests, the subsoils encountered underlying the surface materials consisted of cohesive glacial till deposits to depths ranging from 12 to 19 feet below existing grades (approximate Elevs. 953 to 946), underlain by shale bedrock.
 - 4. Using Terzaghi's bearing capacity formulas and a nominal Factor of Safety (FoS) of 3, shallow foundations may be designed utilizing a net allowable bearing pressure of 4,500 pounds per square foot (psf) for strip and square footings. A gross allowable bearing pressure of 5,000 psf may be utilized for mat foundation design. Our evaluations, considering Boussinesq stress distribution beneath the foundation, indicate total settlement should not exceed 1 inch for the proposed buildings and the majority of the proposed equipment. However, for each HRSG stack, total settlement was calculated on the order of ¾ inch to 1¼ inch using a gross allowable bearing pressure of 5,000 psf with a 30-foot diameter mat foundation. The bearing materials should be field-verified as being native lean clay (CL) having a minimum unconfined compressive strength of 4,500 psf, or properly placed and compacted new engineered fill. In using these relatively high allowable bearing pressures, new engineered fill must consist of dense-graded aggregate, such as Ohio Department of Transportation (ODOT) Item 304.
- 5. For mat foundation design, we recommend a subgrade modulus (k) of 150 pounds per cubic



inch (pci).

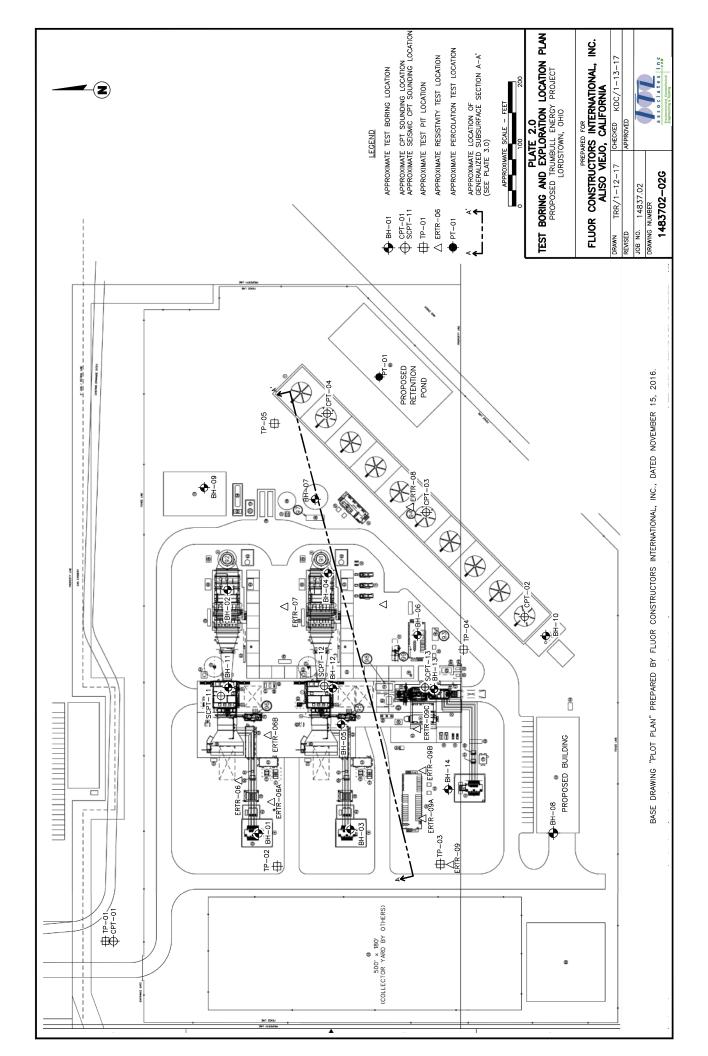
- 6. Following the satisfactory completion of the site preparation and footing excavation inspections outlined in this report, using Terzaghi's bearing capacity formulas and a nominal Factor of Safety (FoS) of 3, the proposed ringwall foundations may be designed utilizing a net allowable bearing pressure of 4,500 pounds per square foot (psf). The tank bottom slabs may be designed using an allowable bearing pressure of 5,000 psf. Based on the allowable bearing pressure of 5,000 psf, total settlement at the center of a tank with a 36-foot diameter was calculated using Boussinesq stress distribution beneath the tank bottom to be on the order of 1 to 1¾ inches. In all cases, suitable bearing should be field-verified as having a minimum unconfined compressive strength of 4,500 psf, or properly placed and compacted new engineered fill. In using these relatively high allowable bearing pressures, new engineered fill must consist of dense-graded aggregate, such as Ohio Department of Transportation (ODOT) Item 304.
- 7. Where heavily loaded structures are planned, or where building and equipment settlement tolerances are particularly sensitive, it is likely that foundations will need to consist of drilled shafts. Based on the shale bedrock at the site, we recommend that piers bear within the native cohesive soils or on rock, with an allowable end-bearing pressure of 10 kips per square foot (ksf).
- 8. Based on the SPT N-values determined for the overburden soils at the site and consideration of rock below 15 feet, the average SPT N_{ch}-value for the overall profile was calculated to be approximately 68 blows per foot (bpf). This average SPT N_{ch}-value greater than 50 bpf is indicative of Site Class C, "Very Dense Soil and Soft Rock," in accordance with ASCE 7-10 Table 20.3-1 criteria.
- 9. Based on SCPT test results, and accounting for an average of approximately 85 feet of bedrock, the weighted average shear wave velocity for the entire profile was determined to be approximately 1,725 feet per second (fps), using relatively conservative assumed shear wave velocity (v_s) in the rock of 2,500 fps. A weighted average shear wave velocity less than 2,500 fps and greater than 1,200 fps is also indicative of a Site Class C designation.
- 10. Based on the results of the laboratory testing and visual classifications, we recommend a subgrade CBR value of 5 percent for flexible pavement design for the Group A-6b or better soils. This CBR value is based on subgrade compacted to at least 100 percent of the maximum dry density as determined by ASTM D 698 (Standard Proctor) or verified as stable through proof rolling.

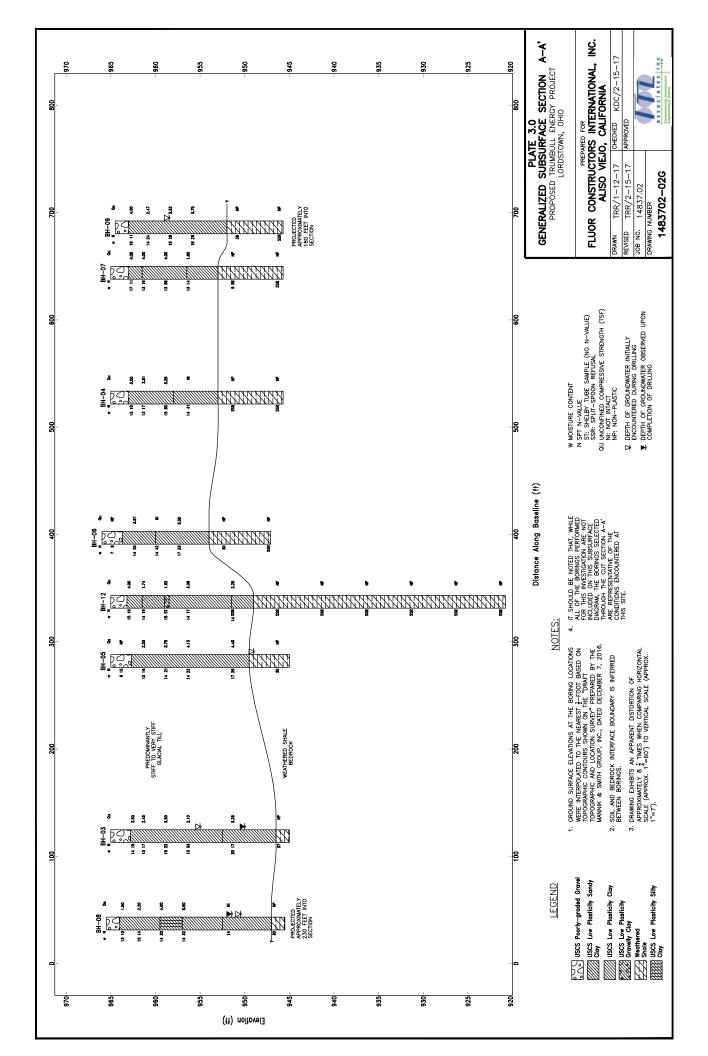


- 11. For properly prepared subgrade soils, a modulus of subgrade reaction (k) of 135 pounds per cubic inch (pci) may be used for rigid pavement design. This section should consist of a minimum of 6 inches of reinforced, air-entrained concrete with a minimum compressive strength of 3,500 pounds per square inch (psi) underlain by a minimum of 6 inches of a densegraded aggregate base such as ODOT Item 304. The pavement section should be supported on subgrade compacted to at least 100 percent of the maximum dry density as determined by ASTM D 698 (Standard Proctor) or verified as stable through proof rolling.
- 12. Based on the composite of the data from the tested samples, it is our opinion that the on-site soils do not represent a significant corrosion risk to buried structural concrete or underground utilities. Based on all of the test data, it is our opinion that there is low to moderate potential for corrosion in underground ductile iron pipe. In any case, if underground ductile iron pipe is planned for this project, it may be prudent to provide corrosion protection, or alternately, consideration should be given to other types of piping.
- 13. Subgrade preparation at the site should consist of removing vegetation, root systems, and other deleterious non-soil materials from the proposed construction area. Suitable topsoil stripped from the areas of buildings and structures may be stockpiled for later use in landscaped areas. Based on the predominance of crushed stone surface materials encountered throughout much of the site, topsoil quantities may be limited.
- 14. It is our opinion that "normal" long-term groundwater levels will be generally encountered at depths of approximately 12 feet or deeper, corresponding to approximate Elev. 953 or lower. It is our experience that adequate control of groundwater seepage, perched water, or surface water run-off into shallow excavations should be achievable by minor dewatering systems, such as pumping from prepared sumps.

This executive summary highlights our evaluations and recommendations and should only be utilized in conjunction with the accompanying report, including the detailed findings, conclusions, and qualifications presented herein.









Trumbull Energy Center

December 2022

Rev: 0

MJE Proposal Number: 25161073300

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Complaint Resolution Procedure

INTRODUCTION AND PROJECT SUMMARY

- Construction duration: 94 weeks.
- Construction schedule: February 6, 2023 thru November 20th, 2024
- Anticipated work days and hours: 5 days per week, 10 hours per day, 7:00 am to 5:30 pm

LOCAL CONTACT / OUTREACH PLAN

- We will notify the City of Warren one week prior to mobilization to the site. We will also notify the City of Warren one week prior to de-mobilizing from the site.
- We will post a sign with the MJ logo and contact information at the road entrance. The sign will be clearly labeled with contact information for inquiries and information.
- Any complaints received through the B&V complaint program related to MJ activities will be communicated to MJ and will be addressed according to our plan

ANTICIPATED NOISE IMPACTS

- Construction Phase
 - Noise related to substation construction is anticipated to be less than 60 dBA at existing residences.
 - Noise complaints for which validly measured operational noise levels exceed 60 dBA will be investigated and resolved through the complaint resolution process and mitigated to the extent possible for resolution.
- Operation Phase
 - Ownership of the Switchyard will transfer post-COD and noise complaints related to Operations will be directed to First Energy.
 - The sound level contribution from the switchyard would be less than .1 dB and 0 dB within a ¼ mile of the site

COMPLAINT RESOLUTION PROCESS

- Response time
 - All complaints responded to within 24 hours of receipt of complaint, except when received on weekends or holidays, in which they will be responded to by the end of the next business day
- Follow up investigation
 - MJ representative will contact the complainant to investigate the nature of the complaint.
- Resolution
 - o MJ will negotiate an acceptable resolution to the complaint
- Form completion
 - Complaints, investigation results and resolutions will be documented on the attached Complaint Resolution Form.
 - Both parties will sign the form, documenting successful resolution of the complaint

COMPLAINT RECORDS KEEPING

- LEC will communicate the status of any complaints received related to Switchyard construction to Staff
 monthly. Once the ownership of the Switchyard is transferred to First Energy, such communications will be
 the responsibility of First Energy. Should LEC receive any complaints after the transfer, LEC will convey those
 complaints to First Energy.
- During construction, complaint forms will be maintained on site and will be submitted to the project team on a monthly basis.

INTEGRITY • INSPIRED • INVESTED



Date Complaint Received:
N:Address: Phone No
1 Hone No
Date:
Date:



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Project Name: Trumbull Energy Center

Project Address: 1500 Hallock Young Rd, Warren, OH 44481

EMERGENCY CONTACTS:

Project Manager: Chase LaFave 248-310-9430

Fire & Rescue Squad (Local):

Name: Lordstown Fire Dept

Address: 1595 Salt Springs Rd, Warren, OH 44481

o Phone: 330-824-3795

Medical Facility – Emergency

O Name: Mercy Health - St. Elizabeth Hospital

Address: 1044 Belmont Ave, Youngstown, OH 44501

o Phone: 911

Occupational Health Clinic – Non-Emergency / Drug/Alcohol Testing

Name: Accord Occupational Health

Address: 7067 Tiffany Blvd #270, Youngstown, OH 44514

o Phone: 330-758-4990

State Police

Name: OH State Highway Patrol

Address: 9423 OH-45, Lisbon, OH 44432

o Phone: 911

Local Police / Sheriff

O Name: Lordstown Police Department

Address: 1583 Salt Springs Rd, Warren, OH 44481

o Phone: 330-824-2545



ON-SITE COMMUNICATION METHODS:

The following may be utilized on-site to report and maintain communication during emergencies.			
	☐ Satellite Phone		
	∨ Verbal	☐ Smoke/Flares	Other:

SITE LOCATIONS:

Muster Area: All employees shall meet in office trailer.

Tornado Shelter: Meet in the Office trailer. General Foreman will perform a head count to verify all employees are accounted for. If emergency permits, take shelter at:

Howland Branch Library – 9095 East Market St, Warren, OH 44484

Lightning/Severe Weather Shelter: Meet in the Office trailer. General Foreman will perform a head count to verify all employees are accounted for. Employees will then leave the station and return to work the next day or when it is determined safe.

Fire Emergency: In office trailer (Unless it is the office trailer then employees shall meet in the trade parking on the southeast corner of station.)

Site Evacuation Route: In office trailer, General foreman will perform a head count to verify all employees are accounted for. Once all present the General Foreman will provide further instructions.

Material Safety Data Sheets (MSDS/FDS): In Office Trailer

First Aid Supplies: In office trailer and foreman's trucks.

EMERGENCY PROCEDURES:

- Emergency:
 - 1. Secure the scene.
 - 2. Notify the MJE Electric Project Manager by phone.
 - 3. General Forman will Notify Customer Field Representative by phone.
 - 4. Complete the MJE "First Report of Incident" Form and send to Iron Mountain before the end of the day.
 - 5. Investigate cause and write-up MJE Incident Report Form with Project Manager explaining the cause of the accident and precautions that will be taken to ensure that it does not happen again.
 - 6. Communicate incident with all contractor crews.
- Event requiring more than first aid:
 - 1. Stabilize accident victim and secure accident scene
 - 2. Call 911.
 - 3. General Foreman or crew shall appoint employee to meet emergency services at the gate at intersection of Melita Rd and Webster Rd. Then employee shall direct emergency services to the



scene.

- 4. Notify the MJE Electric Project Manager by phone.
- 5. MJE Project Manager will Notify Customer Field Representative, MJE Project Manager and MJE Safety Representative by phone.
- 6. Complete the MJE "First Report of Incident" Form and send to Iron Mountain before the end of the day.
- 7. Investigate cause and write-up MJE Incident Report Form with Project Manager explaining the cause of the accident and precautions that will be taken to ensure that it does not happen again.
- 8. Communicate incident with all contractor crews.

First Aid:

- 1. Stabilize accident victim and secure accident scene.
- 2. Notify the MJE Electric Project Manager by phone.
- 3. General Forman will Notify Customer Field Representative by phone.
- 4. Complete the MJE "First Report of Incident" Form and send to Iron Mountain before the end of the day.
- 5. Investigate cause and write-up MJE Incident Report Form with Project Manager explaining the cause of the accident and precautions that will be taken to ensure that it does not happen again.
- 6. Communicate incident with all contractor crews.

Fire/Explosion:

- 1. The whole crew will meet in the office trailer. (If the office trailer is on fire meet in the trade parking lot on the southeast corner of the station)
- 2. General Foremen will perform head count on crew.
- 3. Call fire department.
- 4. If possible secure the scene. (Fire extinguishers in Conex Boxes/Office trailer/in trucks)
- 5. Notify the MJE Electric Project Manager by phone.
- 6. General Forman will Notify Customer Field Representative by phone.
- 7. Complete the MJE "First Report of Incident" Form and send to Iron Mountain before the end of the day.
- 8. Investigate cause and write-up MJE Incident Report Form with Project Manager explaining the cause of the accident and precautions that will be taken to ensure that it does not happen again.
- 9. Communicate incident with all contractor crews.

Severe Weather:

- 1. Crew members shall meet in the office trailer. General Foreman will perform a head count to verify all employees are accounted for. Once all present employees the General Foreman will release the crews from work for the day. Crew member will return the following working day. For tornadoes: shelter at Howland Branch Library 9095 East Market St, Warren, OH, 44484
- Fall Rescue Plan: See Attached Fall Rescue Plan
 - 1. Secure the scene.



- 2. Determine appropriate procedures to take for aiding the employee. Refer to MJE Safety manual for Pole Top Rescue Aerial Basket, or Down Hole Rescue.
- 3. Notify the MJE Electric Project Manager by phone.
- 4. MJE PM to notify the owner of property damage so it can be corrected.
- 5. General Forman will Notify Customer Field Representative by phone.
- 6. Complete the MJE "First Report of Incident" Form and send to Iron Mountain before the end of the day.
- 7. Investigate cause and write-up MJE Incident Report Form with Project Manager explaining the cause of the accident and precautions that will be taken to ensure that it does not happen again.
- 8. Communicate incident with all contractor crews.

Dig-in:

- 1. Secure the scene.
- 2. Notify the MJE Electric Project Manager by phone.
- 3. MJE PM to notify the owner of property damage so it can be corrected.
- 4. General Forman will Notify Customer Field Representative by phone.
- 5. Complete the MJE "First Report of Incident" Form and send to Iron Mountain before the end of the day.
- 6. Investigate cause and write-up MJE Incident Report Form with Project Manager explaining the cause of the accident and precautions that will be taken to ensure that it does not happen again.
- 7. Communicate incident with all contractor crews.

Spill:

- 1. Secure the scene.
- 2. Use spill kits and pools to contain and clean the spill.
- 3. Dispose of contaminated materials properly.
- 4. Notify the MJE Electric Project Manager by phone.
- 5. General Forman will Notify Customer Field Representative by phone.
- 6. Complete the MJE "First Report of Incident" Form and send to Iron Mountain before the end of the day.
- 7. Investigate cause and write-up MJE Incident Report Form with Project Manager explaining the cause of the accident and precautions that will be taken to ensure that it does not happen again.
- 8. Communicate incident with all contractor crews.

EVENT REPORTING:

When working for MJE Transmission Engineering and Project Services, once the scene is secure, Contractor shall report all events immediately utilizing the MJE procedures for event reporting. Events of a more serious nature shall also be reported immediately (verbal reporting is sufficient). Events of a more serious nature include, but are not limited to, injuries requiring transport to a hospital or other medical facility



and customer outages. Following initial notification, standardized incident reports shall be completed and submitted.

- An initial written report shall be submitted by 8:00 am the following day. Within 48 hours, Contractor shall submit an in depth written report.
- When working for MJE, once the scene is secure, Contractor shall report all events immediately. Following
 initial notification, standardized incident reports shall be completed and submitted.
- An initial written report shall be submitted by 8:00 am the following day. Within 48 hours, Contractor shall submit an in depth written report.
- All environmental spills must be reported immediately to the MJE General Foreman and Project Manager as appropriate.

DRUG/ALCOHOL TESTING:

- All Contractor and its subcontractor employees must complete and pass the following drug/alcohol testing:
 - MJE Pre-Employment (48 hours or less prior to first employment on an MJE site)
 - o Post Event (within two hours) on all employees involved in any safety related event
 - o Random
 - Reasonable Suspicion
- Screening substances and their associated cut-off limits will be the same as listed in the applicable General Terms and Conditions. Contractor shall incur all costs associated with the drug testing identified in this section.
- Contractor shall share test results with Owner upon request to the extent allowed by applicable federal, state, or local law. If applicable, Contractor will ensure that employees, agents, subcontractors, or independent contractors and the employees of subcontractors or independent contractors sign an appropriate authorization prior to such tests being conducted, acknowledging the tests are being conducted and authorizing the information obtained to be provided to the Owner.
- Contractor shall have and ensure compliance with a comprehensive substance abuse/drug and alcohol
 policy that complies with all applicable federal, state, and/or local statues or regulations.



EMERGENCY ACTION PLAN REVIEW LOG:
The following employees have reviewed the Emergency Action Plan for this site and verify that they understand and will abide by all the policies and procedures outlined.

NAME: (PRINT)	NAME: (SIGN)	DATE:	COMPANY:	EMERGENCY CONTACT #:



Trumbull Energy Center

December 2022

Rev: 0

MJE Proposal Number: 25161073300

M. J. ELECTRIC, LLC 200 West Frank Pipp Drive | PO Box 686 Iron Mountain, Michigan 49801 P: 906.774.8000 | F: 906.779.4217 www.mjelectric.com



Transmission

Power Generation

Substation

Industrial

Distribution

Renewable Energy

MJE Drilling

Instrumentation

Storm Response



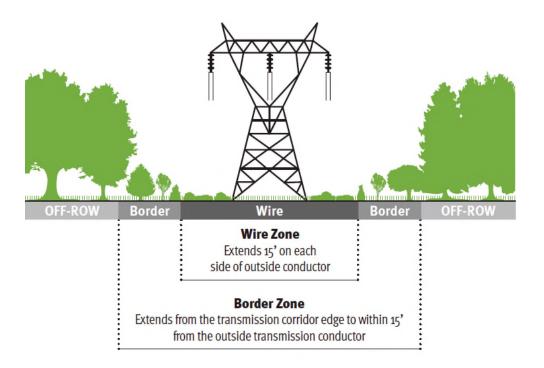
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Vegetation Management Plan

Transmission Lines and Rights-of-Way

Vegetation around transmission lines is treated much differently than vegetation around distribution lines. On transmission rights-of-ways, we typically clear rather than established trees in order to maintain safe and reliable electric service. Some low-growing shrubs are allowed to remain in the transmission corridor to provide a viable habitat for wildlife as long as they do not obstruct safe access.



The approach we take is the control or removal of all incompatible vegetation in the wire zone and border zone that has potential to interfere with the safe and efficient operation of the transmission system. The goal in the wire zone is to promote a low-growing plan community of grasses, herbs, and shrubs (approximately 3-5' in height). In the border zone, we suppose a plant community of flowering plans and taller compatible shrubs (approximately 12-15' in height).



Spill Plan

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1. PURPOSE

To prevent discharges of petroleum into the waters of the United States by complying with the EPA requirements for preparing and maintaining an SPCC Plan where applicable under the Oil Pollution Prevention regulations, Title 40 CFR 112.

2. OBJECTIVES

- 2.1 To prevent employee injury, illness or death resulting from potential petroleum discharge.
- 2.2 To provide guidance necessary to assist operations in their adoption of safe work practices associated with spill prevention control and countermeasure methods when working with petroleum.
- 2.3 To develop work practices and techniques to control the hazards associated with potential petroleum discharges.
- 2.4 To establish necessary training requirements to ensure employees have the understanding of proper safe work practices regarding spill prevention control and countermeasure methods.

3. SCOPE

These methods shall apply to all M.J. Electric work sites where employees or the environment may be exposed to potential petroleum discharge situations under normal working conditions or during an emergency.

4. RESPONSIBILITIES

- 4.1 The M.J. Electric Safety and Health Department will assist the affected Operational or Leasing Department with maintaining their specific SPCC Plan.
- 4.2 The facility manager shall be responsible for implementing and maintaining their site specific SPCC Plan for the affected facility or location.
- 4.3 The facility manager, with assistance from the Safety and Health Department, shall be responsible for the development of the site specific SPCC Plan when applicable.
- 4.4 The petroleum supplier shall be responsible for the maintenance of petroleum storage tanks and tank trucks under their ownership and spill prevention during petroleum transfers under their control.
 - 4.4.1 The petroleum supplier shall be responsible for all petroleum discharges occurring from their vehicles.

5. OWNER INFORMATION

5.1 Owner Name: M.J. Electric, LLC.

Street Address: 200 W. Frank Pipp Dr.

Mailing Address: P.O. Box 686, Iron Mountain, MI 49801

Contact: SPCC Plan Administrator – Administrative Coordinator for Safety and Health; M.J. Electric, 200 W. Frank Pipp Dr., P.O. Box 686, Iron Mountain, MI 49801, Phone: (906) 774-8000



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Location: Locations vary depending on the work being performed.

General Description: Some M.J. Electric facilities handle, store, and dispense petroleum products in the form of gasoline, fuel oil, new and used engine oil, grease, transmission fluid, hydraulic fluid, and radiator fluid.

5.2 Storage Tanks

- 5.2.1 Facility specific bulk storage containers and total petroleum storage capacity varies depending on facility needs.
- 5.2.2 Standard bulk storage containers include:
 - 5.2.2.1 Portable above ground storage tanks (AST's) for unleaded gasoline, fuel oil, new engine oil, and used oil: 1,000 gallon, 660 gallon, and 500 gallon capacities.
 - 5.2.2.2 Drums: 55 gallon capacity.

6. OVERVIEW

- 6.1 All Spill Prevention Control and Countermeasure Plans for M.J. Electric facilities are prepared and implemented as required under the Oil Pollution Prevention regulations in 40 CFR 112.
- 6.2 A non-transportation related facility is subject to SPCC regulations if:
 - 6.2.1 Due to its location, the facility could reasonably be expected to discharge petroleum into or upon the navigable waters of the United States; and
 - 6.2.2 The storage capacity of any Underground Storage Tank (UST) exceeds 42,000 gallons; or
 - 6.2.3 The total aggregate Aboveground Storage Tank (AST) capacity exceeds 1,320 gallons (calculated total of containers with capacity of 55 gallons or more).
- 6.3 M.J. Electric mobile facilities are not required to prepare a new Plan each time the facility is moved to a new site. The Plan may be a general plan. When the mobile or portable facility is moved, it must be located and installed using the discharge prevention practices outlined in the Plan for the facility. The Plan is applicable only while the facility is in a fixed (non-transportation) operating mode.
- 6.4 Facilities can self certify SPCC Plans or have a licensed Professional Engineer (PE) certify SPCC Plans.
 - 6.4.1 This certification attests that:
 - 6.4.1.1 Certifier is familiar with provisions of 40 CFR 112;
 - 6.4.1.2 Engineer or designated person has examined the facility;
 - 6.4.1.3 The Plan has been prepared in accordance with good engineering practices, regulatory guidance, industry recommended practices, or standard design and operational protocols;
 - 6.4.1.4 Procedures for required inspections and testing have been established; and



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6.4.1.5 The plan is adequate for the facility.

- 6.4.2 If a PE certifies the Plan, the PE must be registered in at least one State. It is not necessary to be registered in the State in which the facility is located.
- 6.4.3 See Appendix B for SPCC Plan certification.
- 6.5 The SPCC Plan is not required to be filed with the EPA, but a copy must be available for on-site review by the Regional Administrator during normal working hours if the subject facility is attended at least 4 hours a day. The SPCC Plan must be submitted to the local EPA Regional Administrator and the State agency in charge of petroleum pollution control along with the other information specified in 40 CFR 112.4 if either of the following occurs:
 - 6.5.1 The facility discharges more than 1,000 gallons of petroleum into or upon navigable waters of the United States or adjoining shorelines in a single event; or
 - 6.5.2 The facility discharges more than 42 gallons of petroleum in each of two discharge events within any 12-month period.
- 6.6 Discharge information must be reported to the local EPA Regional Administrator and the state agency within 60 days if either of the thresholds in Section 6.5 is reached. The report should contain the following information:
 - 6.6.1 Name of facility;
 - 6.6.2 Name(s) of the owner or operator of the facility;
 - 6.6.3 Location of the facility;
 - 6.6.4 Maximum storage or handling capacity of the facility and normal daily throughput;
 - 6.6.5 Corrective actions and/or countermeasures taken, including a description of equipment repairs and/or replacements;
 - 6.6.6 An adequate description of the facility, including maps, flow diagrams, topographical maps as necessary;
 - 6.6.7 The cause of the discharge, including a failure analysis of the system or subsystem that failed;
 - 6.6.8 Additional preventative measures taken or contemplated to minimize the possibility of recurrence; and
 - 6.6.9 Such other information the Regional Administrator may require pertinent to the Plan or discharge.
- 6.7 The SPCC Plan shall be amended within 6 months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's discharge potential.
- 6.8 The Plan must be reviewed once every 5 years and amended to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a discharge event and has been proven in the field.



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6.9 All technical amendments must be certified as to their effectiveness and noted in the Plan.

- 6.10 M.J. Electric facilities are not required to develop a Facility Response Plan. A Certification of the Applicability of the Substantial Harm Criteria Checklist is included as Appendix A.
- 6.11 Refer to the M.J. Electric Safety and Health Policy and Procedure Material Handling, Storage, Use and Disposal for further requirements concerning Flammable and Combustible Liquids.

7. GENERAL REQUIREMENTS

- 7.1 The requirements for SPCC Plans listed in 40 CFR 112.7 and specific discharge prevention and containment procedures listed in 40 CFR 112.8 which are applicable to M.J. Electric mobile facilities and remote locations shall be satisfied when the site specific SPCC Plans are created.
- 7.2 All M.J. Electric SPCC Plans shall be specific to the facilities they are written for.
- 7.3 Facility management has determined use of containment and diversionary structures and use of readily available spill equipment to prevent discharged petroleum from reaching navigable waters is practicable and effective and shall be used at affected M.J. Electric facilities.
- 7.4 When required, an SPCC Plan shall be developed. The location of the bulk storage containers; general arrangements of the facility; storm water drain inlets; flow (slope) directions of rain water and spilled petroleum paths; location and contents of each container and transfer stations shall be included in the Plan.
- 7.5 A potential for equipment failure (such as loading or unloading equipment, tank overflow, rupture, or leakage, or any other equipment known to be a source of a discharge) prediction of flow shall be made and included in the SPCC Plan of the direction of flow, rate of flow, and total quantity of petroleum which could be discharged from the facility as a result of major and minor equipment failures.
- 7.6 When it is determined that secondary containment is not practicable, an explanation of why such measures are not practicable will be included in a petroleum spill contingency plan. The contingency plan shall also include a written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of petroleum discharged that may be harmful.

8. SECONDARY CONTAINMENT

- 8.1 Secondary containment or diversionary structures are utilized to control drainage or a discharge of petroleum around bulk storage containers applicable to all Plans.
- 8.2 Secondary containment or diversionary structures shall be provided for all bulk storage containers applicable to all Plans which store petroleum products.
 - 8.2.1 The capacity of the secondary containment structure shall be 125% of the largest tank inside the secondary containment, which allows for precipitation.
 - 8.2.2 The entire containment system, including walls and floor, shall be capable of containing petroleum and shall be constructed so that any discharge from a primary containment system, such as a tank, will not escape the containment system before cleanup occurs.
- 8.3 At a minimum, at least one of the following prevention systems or its equivalent shall be utilized for secondary containment or diversionary structures:
 - 8.3.1 Dikes, berms, or retaining walls sufficiently impervious to contain petroleum;



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- 8.3.2 Curbing;
- 8.3.3 Culverting, gutters, or other drainage systems;
- 8.3.4 Weirs, booms, or other barriers;
- 8.3.5 Spill diversion ponds;
- 8.3.6 Retention ponds; or
- 8.3.7 Absorbent materials.
- 8.4 Walls of diked areas shall be restricted to an average height of 6 feet above the interior grade. Earthen walls 3 feet or more in height shall have a flat section at the top not less than 2 feet wide. The slope on an earthen wall shall be consistent with the slope requirements of the material of which the wall is constructed.
 - 8.4.1 For further slope requirements refer to Safety and Health Policy and Procedure- Excavating Trenching and Shoring, Chapter 7 of the Safety Manual.
- 8.5 No loose combustible material, rubbish, or trash shall be permitted within secondary containment areas or diversionary structures.
- 8.6 Diversionary ponds and catch basins shall not be located in areas subject to periodic flooding.

9. BULK STORAGE CONTAINERS

- 9.1 Each bulk storage container shall be of UL-142 steel construction and shall be compatible with the petroleum they contain and the temperature and pressure conditions of storage.
- 9.2 All bulk storage containers applicable to this Plan shall have secondary containment with a volume that can hold the largest single container (100%), plus another 25% freeboard to contain precipitation.
 - 9.2.1 The UL-142 stamped bulk storage containers of double wall design require no further secondary containment.
 - 9.2.2 Any empty or full drum or barrel applicable to this Plan shall be provided with its own secondary containment system.
 - 9.2.3 Spill pallets shall be provided as secondary containment for 55 gallon drums when stored outside, or inside near floor drains.
- 9.3 Each bulk storage container (except for drums) shall be equipped with a direct-reading level gauge. Venting capacity shall be suitable for the anticipated fill and withdrawal rates.
- 9.4 The bulk storage containers shall be located to prevent discharged petroleum from reaching navigable waters and shall be located where they are not subject to periodic flooding.

10. MOBILE EQUIPMENT

10.1 Large spill kits shall be stored at the job site office and made available to the crews.



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10.2 Small spill kits shall be immediately available to the crew and shall be stored in/on or near the mobile equipment.

11. PETROLEUM TRANSFER AREAS

- 11.1 The petroleum transfer area shall be the only area used to transfer petroleum from the tank trucks to the bulk storage containers and routine handling of products (loading, unloading, and facility transfers).
- 11.2 A sand filled catch basin for minor, routine spillage at petroleum transfer areas shall be installed. The sand shall be periodically replaced as needed.
- 11.3 The bypass valve, pumps and ejectors shall be closed or in the "off" position during fuel transfer.
- 11.4 A physical barrier system, warning signs, or wheel chocks shall be provided in petroleum transfer areas to prevent vehicles from departing prior to complete disconnection of the petroleum transfer lines.
- 11.5 All tank trucks shall be inspected by the person in charge of the site for discharges prior to unloading and departure. All outlets and drains on these vehicles shall be tightened, adjusted, or replaced if necessary to prevent petroleum discharge while in transit.
- 11.6 Warning signs and/or physical barriers (crash protection) shall be placed as needed to prevent vehicles from damaging aboveground tanks and containers, pipelines, or other petroleum transfer operations.

12. FACILITY DRAINAGE

- 12.1 Drainage of rain water from containment areas is accomplished by manually operated spring loaded bypass valves, pumps, or ejectors.
- 12.2 The drainage devices from containment areas shall be sealed closed or in the "off" position except when draining the containment area.
- 12.3 Accumulated rainwater shall be inspected by the person in charge of the site for the presence of any petroleum sheen before draining the uncontaminated (petroleum free) water.
- 12.4 The bypass valve, pumps and devices shall be opened under supervision only after the petroleum transfer is completed and the tank truck has departed.
- 12.5 Facility effluent discharged from containment areas shall be observed by the person in charge of the site to detect possible petroleum contamination and documented each time effluent is discharged. If petroleum is present, it is then contained and disposed of properly.
- 12.6 The person in charge of the site shall keep records of every drainage event, refer to Appendix E for the Dike Drainage Form.

13. SECURITY

- 13.1 The master flow and drain valves shall be locked in the closed position when in non-operating or standby status.
- 13.2 The electrical supply to each petroleum pump shall be locked in the "off" position or disconnected at the end of each work day. When feasible, the starter controls for each petroleum pump shall be located at a site accessible only to authorized personnel when the pump is in a non-operating or non-standby status.



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- 13.3 The dispensing nozzles shall be locked down at the end of each work day.
- 13.4 The loading and unloading connections of petroleum pipelines shall be capped when not in-service or when in standby service for an extended period of time.
- 13.5 Area lights shall be located in such a position to illuminate the office and storage areas to assist in discovery of discharges at night, and deter vandalism.

14. INSPECTIONS

- 14.1 Visual inspections shall consist of a complete walkthrough of the facilities petroleum storage areas and related equipment.
- 14.2 All aboveground tanks, supports, containment structures, gauges, alarms, vents, pipelines, valves, and appurtenances shall be examined and documented once a month using Appendix D to assess their condition.
- 14.3 All flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces shall be inspected.

15. TRAINING

- 15.1 All petroleum handling personnel shall be given site specific petroleum discharge prevention training for each new work site they are assigned to and shall include the operation and maintenance of equipment to prevent discharges of petroleum and spill response procedures.
- 15.2 Yearly petroleum discharge prevention training shall be provided for all petroleum handling personnel to ensure adequate understanding of the SPCC Policy and any Plans applied to their location. These briefings should highlight any past discharge events or failures, standard prevention measures, recently developed precautionary measures, and spill response procedures.

16. REMEDIATION AND RESTORATION

- 16.1 Visible petroleum discharges shall be promptly corrected, including removing accumulations of discharged petroleum in diked areas.
- 16.2 Countermeasures for discharge discovery, response, and cleanup (both the facilities capability and those that might be required of a contractor) include the use of spill kits to clean up minor spills. Large spills shall be handled by the designated clean-up contractors.
 - 16.2.1 Adequate absorbent materials shall be provided in spill kits located strategically throughout all facilities that store petroleum or have equipment that uses petroleum to operate.
- 16.3 Petroleum spill response procedures and contact list for discharge notification, clean up contractors and equipment supply vendors are listed in Appendix C of this policy.
 - 16.3.1 The petroleum spill response procedures in Appendix C shall be posted at the office and / or the show up trailer.
- 16.4 A Petroleum Spill Report, shown in Appendix F, shall be completed for each petroleum spill.



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16.5 Once the emergency coordinator determines the area is safe from any further threat, remediation may be implemented. The emergency coordinator shall be on site to ensure all remediation activities are properly managed. Outside emergency response firms shall be retained to help facilitate remediation.

16.6 All material including soil, water, and absorbent material contaminated with discharged oil shall be removed and put into containers for disposal. The material shall be characterized by the safety and health representative or environmental representative for ultimate disposal.

16.7 Disposal of recovered materials shall be in accordance with Federal, State, and local requirements.

16.8 Restoration of all emergency equipment used during the incident shall begin immediately following the emergency incident. Shovels, rakes, and other reusable equipment shall be consolidated into the least number of drums possible, labeled, and placed in the storage yard. All process equipment exposed to discharged petroleum shall be cleaned using an appropriate solvent. The used cleaning solvent shall be labeled appropriately and stored until properly disposed of.

16.9 All personnel exposed to discharged petroleum shall be decontaminated as needed.

17. **DEFINITIONS**

Alteration means any work on a container involving cutting, burning, welding, or heating operations that changes the physical dimensions or configuration of the container.

Bulk storage container means any container used to store petroleum. These containers are used for purposes including, but not limited to, the storage of petroleum prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container.

Completely buried tank means any container completely below grade and covered with earth, sand, gravel, asphalt, or other material. Containers in vaults, bunkered tanks, or partially buried tanks are considered aboveground storage containers for purposes of this part.

Contract or other approved means:

- 1. A written contractual agreement with an petroleum spill removal organization that identifies and ensures the availability of the necessary personnel and equipment within appropriate response times; and/or
- 2. A written certification by the owner or operator that the necessary personnel and equipment resources, owned or operated by the facility owner or operator, are available to respond to a discharge within appropriate response times; and/or
- 3. Active membership in a local or regional petroleum spill removal organization that has identified and ensures adequate access through such membership to necessary personnel and equipment to respond to a discharge within appropriate response times in the specified geographic area; and/or
- 4. Any other specific arrangement approved by the Regional Administrator upon request of the owner or operator.

Discharge includes, but is not limited to, any spilling, leaking, pumping, pouring, emitting, emptying, or dumping of petroleum, but excludes discharges in compliance with applicable permits.

Facility means any mobile or fixed, onshore or offshore building, structure, installation, equipment, pipe, or pipeline used in oil well drilling operations, petroleum production, petroleum refining, petroleum



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storage, petroleum gathering, petroleum transfer, petroleum distribution, and waste treatment, or in which petroleum is used.

Note: A facility may be as small as a piece of equipment, for example, a tank, or as large as a military base.

Harmful quantity means discharges which affect the water quality standards or cause a film or sheen upon or discoloration of the water or adjoining shorelines.

Mobile Facility means any equipment that is capable of being moved or can move under its own power which stores new or used petroleum for transfer, distribution, storage, or disposal.

Navigable waters means the waters of the United States, including the territorial seas.

- 1. The term includes:
 - 1.1 All waters that are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters subject to the ebb and flow of the tide;
 - 1.2 All interstate waters, including interstate wetlands;
 - 1.3 All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sand flats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation, or destruction of which could affect interstate or foreign commerce including any such waters:
 - 1.3.1 That are or could be used by interstate or foreign travelers for recreational or other purposes; or
 - 1.3.2 From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or,
 - 1.3.3 That are or could be used for industrial purposes by industries in interstate commerce;
 - 1.4 All impoundments of waters otherwise defined as waters of the United States under this section;
 - 1.5 Tributaries of waters identified in paragraphs 1.1 through 1.4 of this definition;
 - 1.6 The territorial sea; and
 - 1.7 Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraph 1 of this definition.
- 2. Waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of the CWA (other than cooling ponds which also meet the criteria of this definition) are not waters of the United States. Navigable waters do not include prior converted cropland. Notwithstanding the determination of an area's status as prior converted cropland by any other Federal agency, for the purposes of the CWA, the final authority regarding CWA jurisdiction remains with EPA.

Non-petroleum oil means oil of any kind that is not petroleum-based, including but not limited to: fats, oils, and greases of animal, fish, or marine mammal origin; and vegetable oils, including oils from seeds, nuts, fruits, and kernels.

Oil means oil of any kind or in any form, including, but not limited to: fats, oils, or greases of animal, fish, or marine mammal origin; vegetable oils, including oils from seeds, nuts, fruits, or kernels; and, other oils



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and greases, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.

Onshore facility means any facility of any kind located in, on, or under any land within the United States, other than submerged lands.

Owner or operator means any person owning or operating an onshore facility or an offshore facility, and in the case of any abandoned offshore facility, the person who owned or operated or maintained the facility immediately prior to such abandonment.

Partially buried tank means a storage container that is partially inserted or constructed in the ground, but not entirely below grade, and not completely covered with earth, sand, gravel, asphalt, or other material. A partially buried tank is considered an aboveground storage container for purposes of this part.

Permanently closed means any container or facility for which:

- 1. All liquid and sludge has been removed from each container and connecting line; and
- 2. All connecting lines and piping have been disconnected from the container and blanked off, all valves (except for ventilation valves) have been closed and locked, and conspicuous signs have been posted on each container stating that it is a permanently closed container and noting the date of closure.

Petroleum oil means petroleum in any form, including but not limited to crude oil, gasoline, fuel oil, mineral oil, new and used engine oil, sludge, oil refuse, and refined products.

Regional Administrator means the Regional Administrator of the Environmental Protection Agency, in and for the Region in which the facility is located.

Secondary Containment or Diversionary Structures mean one of the following systems or its equivalent:

- 1. Dikes, berms, or retaining walls sufficiently impervious to contain petroleum;
- 2. Curbing:
- 3. Culverts, gutters, or other drainage systems;
- 4. Weirs, booms, or other barriers;
- 5. Spill diversion ponds;
- 6. Retention ponds; or
- 7. Absorbent materials.

Note: The entire containment system, including walls and floor, shall be capable of containing petroleum and shall be constructed so that any discharge from a primary containment system, such as a tank or pipe, shall not escape the containment system before cleanup occurs.

Spill Prevention Control and Countermeasure Plan, SPCC Plan, or Plan means the document that details the equipment, workforce, procedures, and steps to prevent, control, and provide adequate countermeasures to a discharge.

Wetlands means those areas that are inundated or saturated by surface or groundwater at a frequency or duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include playa lakes, swamps,



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marshes, bogs, and similar areas such as sloughs, prairie potholes, wet meadows, prairie river overflows, mudflats, and natural ponds.

18. DEVELOPMENT HISTORY

(Final Program)	Date 02/24/2006
Writer	Matt Rossing - Safety and Health Administrative Manager
Reason Written	To establish a uniform SPCC Plan
Reviewed By:	Safety and Health: David Houle, Garth Brasure, Rocky Schuster, Dave Lemke, Tom Hogue, Terry Alwine, Jeff Walling, Robin Abel, Al Dame, Ann Hicks Operations: Steve Lindley, George Troutman, Kent Richmond, John Capra, Erik Stenvig, Russ Pomeroy, Roy Ruohomaki, David Carlson, Ed Farrington, Andy Gardner, Earl Koski, Jack Mueck, Bill Nagy, Tom Nagy, Greg Rogers, Mike Shuba, Marty Sutinen, Michael Troutman, Joey Wade
Approved By:	
Signature	

(Revision 1)	Date 02/01/2007
Writer	Matt Rossing – Safety and Health Administrative Manager
Reason for Change	Updated logo and removed the inc. from M.J. Electric references
Reviewed By:	Safety and Health:
	Operations:
Approved By:	
Signature	

(Revision 2)	Date 08/08/2008
Writer	Al Schultz – Administrative Coordinator of Safety and Health
Reason for Change	Revised policy to reflect regulatory changes
Reviewed By:	Safety and Health Committee Members
Approved By:	Attendees of the Safety Committee meeting on 08/08/08
Signature	COO: Peter Pasch

19. APPENDICES



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$\begin{array}{c} \textbf{APPENDIX A-CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA} \\ \textbf{CHECKLIST} \end{array}$

FACILITY NAME: M.J. Electric, LLC
FACILITY ADDRESS (Home Office): 200 W. Frank Pipp Dr, Iron Mountain, MI 49801
Note: This checklist applies to all M.J. Electric facilities including Mobile facilities.
1. Does the facility transfer petroleum over water to or from vessels and does the facility have a total petroleum storage capacity greater than or equal to 42,000 gallons?
YesNo
2. Does the facility have a total petroleum storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground petroleum storage tank plus sufficient freeboard to allow for precipitation within any aboveground petroleum storage tank area?
YesNo
3. Does the facility have a total petroleum storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the formula in Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Environments" (Section 10, Appendix E, 40 CFR 112 for availability) and the applicable Area Contingency Plan.
YesNo
4. Does the facility have a total petroleum storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula (Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula 1) such that a discharge from the facility would shut down a public drinking water intake ² ?
YesNo
5. Does the facility have a total petroleum storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
YesNo
CERTIFICATION:
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.
Name (print) Title
Signature Date

¹If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form. ²For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c). (From 40 CFR 112 Appendix C, Attachment C-II)



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APPENDIX B - PLAN REVIEW

This M.J. Electric SPCC Plan has been reviewed and certified by a Corporate representative or by a Registered Professional Engineer (PE) as shown below:

I herby attest that:

- I am familiar with the requirements of 40 CFR 112;
- I or my agent has visited and examined the facility (or a representative mobile facility);
- The SPCC Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR 112;
- Procedures for required inspections and testing have been established; and
- The SPCC Plan is adequate for the facility.

Site Location:		
Job Number:		
Corporate Representative (Print):		
Signature:	Date:	
Title:		
Professional Engineer (PE): (Print)		
Signature:	Date:	
PE registration number:	State(s):	



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APPENDIX C – PETROLEUM SPILL RESPONSE PROCEDURES

PETROLEUM SPILL RESPONSE PROCEDURES

A quick response to a spill will reduce damage to your property, to neighboring properties, to the environment, and will reduce your costs in cleaning up the contamination. The four main steps in an effective spill response are:

- 1. Contain the spill and address immediate threats
 - -Call 911 for fire/explosion or other serious safety hazard
 - -protect onsite personnel and the general public
 - -establish site security
 - -identify material spilled / MSDS
 - -contain the spill

-Identify and protect any on-site or nearby environmentally sensitive areas such as surface waters, wetlands, drainage ditches, storm sewers, drinking water wells, etc. This can be accomplished by constructing berms or covering/plugging storm sewers and manholes. If a hazardous substance does reach a surface water, absorbent booms and dikes may be needed to contain the spilled substance.

-protect spill from weather conditions

2. Immediately notify the M.J. Electric Administrative Coordinator for Safety and Health

Al Schultz - desk (906) 776-4594, cell (906) 282-0144

- 3. Investigate and cleanup
 - -investigate the incident
 - -a specialized contractor may need to be hired to cleanup depending on severity of spill
 - -dispose of the recovered waste and absorbent materials per Federal, State and Local requirements
- 4. Document your spill response
 - -complete an M.J. Electric Incident Report
 - -complete an M.J. Electric Oil Spill Report

PHONE NUMBERS

- 1. M.J. Electric 24-hour Hotline: 1-800-451-6866
- 2. Police/Fire Department: 911
- 3. Local Contact:

Clean-up Contractors

- 1. ONYX Environmental Services (Nationwide): 1-800-688-4005
- 2. Local Contractor:_____

Supplies and Equipment

- 1. M.J. Electric Tool Control: 906-776-4568
- 2. Grainger Industrial Supply: 1-800-323-0620
- 3. Airgas Industrial Safety Products: 1-800-548-0909
- 4. Lab Safety Supply (LSS): 1-800-356-0783
- 5. Local Supplier:_____



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APPENDIX D - FACILITY MONTHLY INSPECTION CHECKLIST

Job #:	Project Location:				
Description of facility or area	inspected:				
	storage areas, and refi			tis checklist is used for monthly inspections of p All defective items shall be recorded and repor	rted to the on-site
Item		Yes	No	Equipment Description / Corrective Act	tion Date Corrected
1. Tank surfaces show signs of le	eakage				
2. Tanks are damaged, rusted, or	deteriorated				
3. Tank supports appear to be so	und				
4. Tank foundations have eroded	l or settled				
5. Level gauges or alarms are inc	operative				
6. Vents are un-obstructed and w	orking properly				
7. Pipelines or supports are dama	aged or deteriorated				
8. Buried pipelines are exposed					
9. Loading/unloading area is dan	naged or deteriorated				
10. Connections are not capped of	or blank-flanged				
11. Petroleum-related labels or s	igns are legible				
12. Secondary containment is da	maged or stained				
13. Dike drainage valves are clos	sed				
14. If rainwater is present in the system area, does sufficient volu control?	me remain for spill				
15. Pipes, valves, or pumps show	v signs of leaking				
16. The petroleum-containing eq have crash protection to prevent motor vehicles etc.)	physical damage (i.e.				
17. Are there any oil or petroleur ground around the tank or machi containment area?	inery or in secondary				
18. Area lighting is functioning					
19. Emergency spill kits and equavailable					
	Corrective action is	require	ed if ar	ny of the above items indicate a need.	
Inspector Name: (Please Prin	t)			Telephone #: Da	nto:
inspector name: (Please Filiit)				Telephone #.	ite.
Comments:					



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APPENDIX E - RECORD OF DIKE DRAINAGE

Job #:	Project Location:					
Description of facility <i>or</i> area:						
Instructions: This record will be completed when rainwater from diked areas is drained into a storm drain, open water course, lake, or pond.						
Diked Area	Date	Presence of Oil	Time Started	Time Finished	Initials	Comments
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						
11.						
12.						
13.						
14.						
15.						
16.						
Additional Comments:						
Corrective Actions Tak	ken:					



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APPENDIX F - PETROLEUM SPILL REPORT

Report all petroleur	n spills to th	ne M.J. F	Flectric	Safety	and Health D	enartn	nent or En	vironmental R	enresent	ative the day	of the discovery
M.J. Electric 24-				Guicty	una meann b	Сраги	none or En				906-776-4590
Job#:	Spill #:	Spill	location:					Date	of discover	y: Ti	me of discovery:
											: □ AM □ PM
First reported by:	1		R	eported to:				Date	reported:	Ti	me reported:
											: AM PM
Name of first responder:			N	ames of ot	her individuals a	nd / or or	ganizations w	ho have been cont	acted:	L	
Type of petroleum discharg	ed: Motor C	Oil Hy	draulic Fl	uid 🔲 Di	esel Fuel 🔲 G	asoline	Other:				
Description of spill:											
Cause of early											
Cause of spill:											
Any pictures taken of spill a	rea? C	Quantity pe	etroleum o	discharged	: Source of	the disch	narge:				
☐ Yes ☐ No		, , ,		ŭ			Ü				
Spill containment procedure	es:										
Is petroleum flowing ☐Yes	s ☐ No Is pe	etroleum c	contained	☐Yes ☐	No Did any	thing ca	tch on fire?	☐ Yes ☐ No	Was fire de	epartment dispat	ched? Yes No
Did any material reach a dit	ch or storm drai				h a sanitary sew			caused by the disc	charge?		aused by the discharge?
☐ Yes ☐ No			Yes	∐ No			Yes _] No		☐ Yes ☐	No
Any soil samples taken?	1/4	Date tak	ken:		Time taken:		Taken by:		5	Sent to:	
☐ Yes ☐ No ☐ N	V/A				: AM	PM					
Was the contaminated soil ☐ Yes ☐ No ☐ N		Date dis	sposed:		Time disposed:		Method of	disposal:			
	W/A				AM	PM					
In order to complete	the prelimin	nary doc	cument	ation of	the spill, obt	ain an	d attach th	ne completed o	documen	ts as follows	3:
1. M.J. Electric Incident Rep	oort: Yes	☐ No	□ N/A			2. MSI	OS of the spille	ed material: Ye	s 🗌 No	D □ N/A	
3. Chain-of-Custody form for	or soil sampling:	☐ Yes	☐ No	□ N/A	1	4. Soil	4. Soil sampling analysis results: ☐ Yes ☐ No ☐ N/A				
5. Disposal receipts: ☐ Yes ☐ No ☐ N/A					6. Other:						
Comments:											
Report completed by: (Plea	se Print)			Title:				Telephone #:			Date:
The M. I. Claretinic Or	المصميلية	- مالمام	. بدلیو می			l Deni		اال مملاف			
The M.J. Electric Safety and Health Department or Environmental Representative will notify: -The DNR Spills Coordinator for the region if it is a DNR reportable spill.											
					•		•	n EPA reporta	ble snill		
'		3.0.1u. /	.Griffin	Jacoi u	0	agoni	., ui	/ . roporta	and opin.		



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APPENDIX F - PETROLEUM SPILL REPORT

Diagram: Use the box below to draw a diagram of the location of the spill. Use roads, pole numbers a as reference points. When drawing the diagram, remember someone may have to return to this location	nd edges of right-of-ways on in the future.
	Ņ
	w E
	S
Comments:	



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APPENDIX G – CROSS REFERENCE

The following is a Cross Reference of the M.J. Electric SPCC Policy to Subparts A through D of the amended Oil Pollution Prevention regulations in 40 CFR Part 112 dated July 17, 2002 as required by the Environmental Protection Agency.

40 CFR Part 112	M.J. Electric SPCC Plan					
112.1 112.7 Subport A Applicability Definitions	and Conaral Paguiroments For All Facilities and All					
	112.1 – 112.7 Subpart A – Applicability, Definitions, and General Requirements For All Facilities and All Types of Petroleum's.					
112.1 General Applicability.						
112.1 (a1) (a2)	Section 1					
112.1 (b) (b1) (b2) (b3) (b4)	Section 3					
112.1 (c)	Not Applicable					
112.1 (d) (d1) (d1i) (d1ii) (d1iii)	Not Applicable					
112.1 (d2) (d2i) (d2ii)	Section 6.2					
112.1 (d3)	Not Applicable					
112.1 (d4)	Not Applicable					
112.1 (d5)	Section 6.2					
112.1 (d6)	Not Applicable					
112.1 (e)	Section 6.1					
112.1 (f)	Section 6.1					
112.1 (f1) (f2) (f3) (f4) (f5)	Not Applicable					
112.2 Definitions	Section 16					
112.3 Requirements to prepare and implement a Spill						
112.3 (a)	Section 6.1					
112.3 (a) 112.3 (b)	Section 6.1					
112.3 (c)	Section 6.3					
112.3 (d) (d1) (d1i) (d1ii) (d1ii) (d1iv) (d1v)	Section 6.4 Pending amendment to final rule					
112.3 (d2)	Section 6.1					
112.3 (e) (e1) (e2)	Section 6.5					
112.3 (f) (f2i) (f2ii) (f2iii) (f3)	Not Applicable					
112.4 Amendment of Spill Prevention, Control, and Co						
112.4 (a)	Section 6.5 and 6.6					
112.4 (a1) (a2) (a3) (a4) (a5) (a6) (a7) (a8) (a9)	Section 6.6					
112.4 (b) (c) (d) (e) (f)	Not Applicable					
112.5 Amendment of Spill Prevention, Control, and Co	· · · · · · · · · · · · · · · · · · ·					
112.5 (a)	Section 6.7					
112.5 (b)	Section 6.8					
112.5 (c)	Section 6.9 Pending amendment to final rule					
112.6 Amendment to self certify SPCC Plans of qualify						
112.6	Section 6.4					
112.7 General requirements for Spill Prevention, Cont	Section 7					
112.7 (a1) (a2) 112.7 (a3)	Section 7 Section 7.4					
112.7 (a3) 112.7 (a3i)	Section 7.4 Section 5.2 and 7.4					
112.7 (a3i) 112.7 (a3ii)	Section 1.2 and 7.4 Section 11					
112.7 (a3ii) 112.7 (a3iii)	Section 8					
112.7 (a3ii) 112.7 (a3iv)	Section 16					
112.7 (a3v)	Section 16.7					
112.7 (a3vi)	Section 16.3					
112.7 (a4)	Section 7.5 and 16.3					



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110.7 (5)	0 .: 162					
112.7 (a5)	Section 16.3					
112.7 (b)	Section 7.5					
112.7 (c)	Section 8.2					
112.7 (c1) (c1i) (c1ii) (c1ii) (c1iv) (c1v) (c1vi) (c1vii)	Section 8.3					
112.7 (c2) (c2i) (c2ii)	Not Applicable					
112.7 (d) (d1) (d2)	Section 7.6					
112.7 (e)	Section 14					
112.7 (f1)	Section 15.1					
112.7 (f2)	Section 4					
112.7 (f3)	Section 15.2					
112.7 (g1)	Not Applicable					
112.7 (g2)	Section 13.1					
112.7 (g3)	Section 13.2					
112.7 (g4)	Section 13.4					
112.7 (g5)(g5i) (g5ii)	Section 13.5					
112.7 (h1)	Not Applicable Supplier Responsible					
112.7 (h2)	Section 11.4					
112.7 (h3)	Section 11.5					
112.7 (i)	Not Applicable					
112.7 (j)	Section 1					
112.0 112.11 Cubmont D. Doguinomonto for Detuctory Oils and Non-Detuctory Oils Freent Animal Fata						

112.8 – 112.11 Subpart B - Requirements for Petroleum Oils and Non-Petroleum Oils, Except Animal Fats and Oils and Greases, and Fish and Marine Mammal Oils; and Vegetable Oils (Including Oils from Seeds, Nuts, and Fruits, and Kernels).

112.8 Spill Prevention, Control, and Countermeasure Plan requirements for onshore facilities.					
112.8 (a)	Section 7.1				
112.8 (b1)	Section 12.1 and 12.3				
112.8 (b2)	Section 12.1				
112.8 (b3)	Section 8.6				
112.8 (b4)	Not Applicable				
112.8 (b5)	Not Applicable				
112.8 (c1)	Section 9.1				
112.8 (c2)	Section 9.2				
112.8 (c3)	Section 12				
112.8 (c3i)	Section 12.2				
112.8 (c3ii)	Section 12.3				
112.8 (c3iii)	Section 12.4				
112.8 (c3iv)	Section 12.6				
112.8 (c4)	Not Applicable				
112.8 (c5)	Not Applicable				
112.8 (c6)	Section 4.4 and 14; Supplier responsible for testing				
112.8 (c7)	Not Applicable				
112.8 (c8) (c8i) (c8ii) (c8iii)	Not Applicable Supplier Responsible				
112.8 (c8iv)	Section 9.3				
112.8 (c8v)	Not Applicable				
112.8 (c9)	Not Applicable				
112.8 (c10)	Section 16.1				
112.8 (c11)	Section 9.4				
112.8 (d)	Section 11				
112.8 (d1) (d2) (d3)	Not Applicable				
112.8 (d4)	Section 14.2 and 14.3				
112.8 (d5)	Section 11.6				



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112.9 Spill Prevention, Control, and Countermeasure Plan requirements for onshore oil production facilities.				
112.9	Not Applicable. This facility is not an oil production			
	facility.			
112.10 Spill Prevention, Control, and Countermeasure	Plan requirements for onshore oil drilling and work			
over facilities.				
112.10	Not Applicable. This facility is not an oil drilling and			
	work over facility.			
112.11 Spill Prevention, Control, and Countermeasure	Plan requirements for offshore oil drilling and work			
over facilities.				
112.11	Not Applicable. This facility is not an oil drilling and			
	work over facility.			
112.12-112.15 Subpart C – Requirements for Anim	nal Fats and Oils and Greases, and Fish and Marine			
Mammal Oils; and for Vegetable Oils, Including Oils from Seeds, Nuts, Fruits, and Kernels.				
112.12 – 112.15	Not Applicable. This facility does not work with Animal			
	Fats and Oils and Greases, and Fish and Marine			
	Mammal Oils; or Vegetable Oils, including Oils from			
	Seeds, Nuts, and Fruits and Kernels.			
112.20 – 112.21 Subpart D – Response Requirements				
112.20 – 112.21	Not Applicable. A Certification of the Applicability of			
	the Substantial Harm Criteria Checklist is included as			
	Appendix A.			



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APPENDIX H – VEHICLES

Vehicles

M.J. Electric vehicles that store and transfer petroleum include:

2000 Ford F750 Lube/Oil Truck #1484

The total petroleum storage capacity of the vehicle is 1,413 gallons. The individual petroleum storage tanks include: (1) 60 gallon hydraulic fluid tank, (1) 850 gallon diesel fuel tank, (3) 95 gallon new oil tanks, (1) 30 gallon new oil tank, (1) 60 gallon antifreeze tank, (1) 128 gallons used oil tank.

2005 Chevrolet C7500 Lube/Oil Truck #2387

The total petroleum storage capacity of the vehicle is 1303 gallons. The individual petroleum storage tanks include: (1) 50 gallon new oil tank, (2) 150 gallon new oil tanks, (2) 250 gallon new oil tanks, (1) 300 gallon used oil tank, (1) 30 gallon hydraulic oil reservoir, (1) 55 gallon drum new anti-freeze, (1) 55 gallon drum used anti-freeze, and (1) 120 lbs. (13 gallon) grease drum.

2007 Chevrolet C7500 Lube/Oil Truck #2647

The total petroleum storage capacity of the vehicle is 1303 gallons. The individual petroleum storage tanks include: (1) 50 gallon new oil tank, (2) 150 gallon new oil tanks, (2) 250 gallon new oil tanks, (1) 300 gallon used oil tank, (1) 30 gallon hydraulic oil reservoir, (1) 55 gallon drum new anti-freeze, (1) 55 gallon drum used anti-freeze, and (1) 120 lbs. (13 gallon) grease drum



Trumbull Energy Center

December 2022

Rev: 0

MJE Proposal Number: 25161073300

M. J. ELECTRIC, LLC 200 West Frank Pipp Drive | PO Box 686 Iron Mountain, Michigan 49801 P: 906.774.8000 | F: 906.779.4217 www.mjelectric.com



Transmission

Power Generation

Substation

Industrial

Distribution

Renewable Energy

MJE Drilling

Instrumentation

Storm Response



M. J. ELECTRIC, LLC 200 West Frank Pipp Drive | PO Box 686 Iron Mountain, Michigan 49801 P: 906.774.8000 | F: 906.779.4217

www.mjelectric.com

Trumbull Energy Center

Site Locations

- ï Switch Yard
 - 1500 Hallock Young Rd., Warren, Ohio 44481

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Case No(s). 22-0697-EL-BLN

Summary: Notice of Compliance electronically filed by Teresa Orahood on behalf of Dylan F. Borchers