

Orr&Reno

October 11, 2013

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Via Hand Delivery and Electronic Mail

NH Site Evaluation Committee
c/o Jane Murray, Secretary
29 Hazen Drive, P.O. Box 95
Concord, NH 03302-0095

Re: Docket 2010-01, Groton Wind, LLC

Dear Ms. Murray:

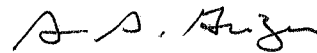
Enclosed for filing with the Site Evaluation Committee in the above-captioned docket, please find 9 copies of Groton Wind, LLC's Environmental, Health and Safety Plan which has been signed by the following persons: Roger Thompson, Groton Fire Chief; Raymond Valentine, Assistant EMS Director for the Town of Rumney; Kenneth Ward, Rumney Fire Chief; John Fischer, Hebron Fire Chief; and David Coursey, Rumney Fire Captain.

Please contact me if there are any questions about this filing. Thank you for your assistance.

Lawrence A. Kelly
(Of Counsel)

Neil F. Castaldo
(Of Counsel)

Very truly yours,



Susan S. Geiger

cc: Service List (electronic mail only)
Senior Assistant Attorney General Karen Schlitzer (electronic mail only)
Ronald Anstey (electronic mail only)
Mr. Mark Watson (U.S. mail only)
Enclosures
1072737_1



Groton Wind Plant Environmental, Health and Safety Plan

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Name: Stephanie Carey
Name: Ryan Haley

Title: O&M ESH Manager
Title: Plant Manager

Date: June 18, 2013

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1.0 PURPOSE & SCOPE

- 1.1 The purpose of this plan is to summarize the program of Iberdrola Renewables (Iberdrola or IR) relating to Environmental, Health and Safety, for the purpose of meeting requirements in the Town of Groton and Town of Rummey Agreements.
- 1.2 This document is applicable to Groton Wind LLC.

2.0 HAZARD COMMUNICATION

- 2.1 Iberdrola maintains a written Hazard Communications Program which has two main purposes:
 - 2.1.1 First is to identify and communicate each type of hazard found at an Iberdrola’s electrical generating plant, then mitigate the hazard through engineering controls, administrative controls (procedures) and PPE.
 - 2.1.2 Second is to meet the requirements of 29 CFR §1910.1200 which is safe management of hazardous substances.
- 2.2 The Hazard Communication Program describes responsibilities of personnel at the plant as they relate to hazard communications and is periodically reviewed and updated as needed.
- 2.3 The Hazard Communication Program includes tools for employees to use to:
 - 2.3.1 Conduct monthly chemical inventory – This is used for the Tier II reporting under EPCRA.
 - 2.3.2 Inspection forms and assessments which help employees find potential safety, environmental and wildlife concerns.
 - 2.3.3 Forms that are used to train employees if a new chemical is brought to the plant.
- 2.4 The Hazard Communications program provides guidance for employees for the following:
 - 2.4.1 Actions to be taken if a safety hazard is found.
 - 2.4.2 Processes to follow prior to conducting work at the wind plant.
 - 2.4.3 How to Maintain MSDS (SDS) binders at the plant.
 - 2.4.4 Proper handling, storage and transportation of compressed gasses which may be used at the plant.
 - 2.4.5 Proper labeling of all chemicals and lubricants at the plant.
 - 2.4.6 Training requirements applicable to the Hazard Communications Program.
 - 2.4.7 Inspection and recordkeeping requirements applicable to the Hazard Communications Program.

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- 2.5 Appendix A of this document is a map which shows the location of each wind turbine and the O&M Building. Appendix B of this document shows a diagram of the O&M Building and includes the location of items such as oil storage, flammable material storage, emergency response equipment, hazardous waste and universal waste storage areas.
- 2.6 Groton wind plant maintains MSDS (SDS) sheets for all chemicals at the plant in the O&M Building. These binders are kept up to date and are available at the O&M building for review by emergency services personnel upon request.

3.0 EMERGENCY RESPONSE

- 3.1 Iberdrola maintains an Emergency Response Plan which outlines the immediate and supplementary actions to be taken by plant personnel in the unlikely event of an emergency. The Emergency Response Plan has been designed to meet the requirements of 29 CFR §1910.38.
- 3.2 Responsibilities of personnel at the plant and at the corporate office are clearly defined within this procedure in the unlikely event of an emergency and are periodically reviewed and updated as needed.
- 3.3 All Iberdrola personnel assigned to the Groton Wind Plant are required to maintain current certifications in first aid, CPR and the use of an AED. Wind Plant technicians and Managers are trained in and maintain proficiency in Fall Protection and Rescue from wind turbines.
- 3.4 The Emergency Response Plan provides guidance for personnel for the following:
- 3.4.1 Methods of notification and when the notifications must be made.
 - 3.4.2 Periodic inspections of emergency response equipment such as AED's, first aid kits, eyewash/shower stations, fire extinguishers and spill kits to ensure it is available and in good condition.
 - 3.4.3 Emergency response kit which is used to rescue personnel from wind turbines.
 - 3.4.4 Training requirements for employees with regard to emergency response.
 - 3.4.5 Inspection and recordkeeping requirements applicable to the Emergency Response Plan.
- 3.5 The Emergency Response Plan also provides guidance on how to conduct plant drills to test the emergency response procedures. When Iberdrola wind plants perform drills, they are encouraged to have local emergency services participate in these drills.

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- 3.6 In the event that an employee at the Groton Wind Plant calls 911, emergency services should be dispatched to the O&M Building.
- 3.6.1 The Emergency Response Procedure directs an Iberdrola employee to meet emergency services.
 - 3.6.2 The Iberdrola employee may, if appropriate, escort emergency services to the location they are needed.
 - 3.6.3 First responders will be given maps and directions based on site signage and the site map.
 - 3.6.4 If the roads at the plant are impassible as a result of inclement weather, the Iberdrola employee will provide transportation for emergency services personnel in an all-terrain vehicle.
- 3.7 Appendix C of this document is an Emergency Contact List for the Groton Wind Plant.
- 3.8 The Emergency Response Plan contains immediate, and if applicable, supplementary actions for the following emergencies:
- 3.8.1 Plant Evacuation
 - 3.8.2 Medical Emergency
 - 3.8.3 Fire
 - 3.8.4 Hurricane
 - 3.8.5 Lightning
 - 3.8.6 Flooding
 - 3.8.7 Extreme Heat
 - 3.8.8 Snow and Winter Weather (see Section 3.9 below)
 - 3.8.9 Icing on Wind Turbines or External Equipment (see Section 3.10 below)
 - 3.8.10 High Winds
 - 3.8.11 Earthquake
 - 3.8.12 Oil/Chemical Spill
 - 3.8.13 Bomb Threat
 - 3.8.14 Sabotage
 - 3.8.15 Violence in the Workplace
 - 3.8.16 Infectious Disease/Pandemic
- 3.9 The Emergency Response Plan for the Snow and Winter Weather provides for the following actions:
- 3.9.1 Actions to take when traveling during the winter season:
- a) Listen to the forecasts before departing and postpone travel if inclement weather is occurring or expected.
 - b) Avoid traveling alone.

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- c) Inform others of your timetable and planned routes.
- d) Keep your gas tank near full.
- e) Adjust your speed to the conditions and increase following distances. Bridges and overpasses can be more slippery than other parts of the road.
- f) Carry a cell phone with you to call for assistance if needed.
- g) Carry traction devices in your vehicle.
- h) Carry a winter survival kit in your vehicle at all times.
- i) Carry winter gear such as boots, clothes, hat, gloves, jacket and a blanket in your vehicle.

3.9.2 If in your vehicle:

- a) Stay inside your vehicle and call for help.
- b) Make yourself visible to rescuers by turning on lights at night when running the engine. Also tie a red or other bright colored cloth to the antenna or door.
- c) Run the motor for ten minutes every hour, but open the windows slightly to allow for proper ventilation. Make sure the exhaust pipe is free of snow to prevent the buildup of carbon monoxide.
- d) Exercise from time to time to keep the blood circulating and to keep warm.

3.9.3 If outside:

- a) Attempt to find shelter to stay dry.
- b) Cover all exposed parts of the body.
- c) If no shelter is nearby, prepare a wind break or snow cave for protection.
- d) If possible, build a fire for heat if stranded.
- e) Do not eat snow as it will lower your body temperature.

3.9.4 If working in a turbine:

- j) Closely monitor conditions and if they become too cold, cease work and return to a warm area.
- k) Wear appropriate cold weather gear.
- l) Take frequent warming breaks.
- m) Minimize cold exposure to skin/extremities.
- n) Attempt to stay sheltered and dry.

3.10 The Emergency Response Plan for the Icing on Wind Turbines or External Equipment provides for the following actions:

Note: Ice that has formed on a wind turbine typically sheds as the air temperatures rises; however, cases have been documented when ice shedding occurred without a temperature rise. Shedding ice may be thrown a significant distance as a result of the rotor spinning or wind blowing the ice fragments. Icing

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of blades is a significant issue that during “shedding” poses a risk of injury or property damage. Everyone is reminded that at any time when “icing” may potentially occur there is no replacement for using constant vigilance in assessing your surroundings.

3.10.1 If at any time you feel that conditions are not safe, immediately move to a safe location and notify the plant manager of the hazards.

3.10.2 In cold conditions in which the weather is favorable for ice forming, an initial inspection of the wind turbine towers and cranes shall be performed before crossing the wind turbine safety setback perimeter - at Groton: **159 meters (524 feet)** from the wind turbine.

3.10.3 Any time conditions exist such that icing could occur, perform the following:

- a) Never cross a wind turbine safety setback perimeter that is actively shedding ice, or if conditions are such that ice will begin to shed.
- b) Minimize time spent in any area where ice has built up and may fall or be thrown. This includes wind turbines, met towers or other structures.
- c) Prior to approaching within the wind turbine safety setback perimeter of any turbine that you suspect has ice buildup (including driving past) the turbine must be shut down remotely and remain shut down until everyone is outside of the wind turbine safety setback perimeter.
- d) If possible approach the wind turbine from the upwind direction.
- e) Assess wind direction and yaw position, and then enter the wind turbine from a safe direction. If possible, yaw the turbine remotely to provide for a safer entry.
- f) When you leave a wind turbine with ice build-up, the wind turbine shall remain shut down until you are outside of the wind turbine safety setback perimeter, then start it remotely.
- g) Be aware of changes in the ambient temperature; as temperatures change, ice may “shed.”
- h) In the event there is ice buildup on the nacelle and/or nosecone, access to the nacelle roof and the nosecone are prohibited. The basis for this is twofold: to avoid an overload condition of the nosecone as well as avoiding a fall hazard for those turbines in which you must exit via the roof of the nacelle to enter the nosecone.

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- i) If the wind turbine starts “shedding” ice while you are inside, stay in the tower until it is safe to exit.

4.0 FIRE PREVENTION

- 4.1 Iberdrola maintains a written Fire Prevention Plan which is designed to accomplish the following:
- 4.1.1 Meet the requirements of 29 CFR §1910.39 and 29 CFR §1910 Subpart L.
 - 4.1.2 Provide the information necessary for Iberdrola personnel to maintain a safe workplace free from fire hazards.
- 4.2 The Fire Prevention Plan describes responsibilities of personnel at the plant as they relate to fire prevention. This document is periodically reviewed and updated as needed.
- 4.3 This plan provides tools for employees to use at the plant to:
- 4.3.1 Document periodic inspections for potential fire hazards.
 - 4.3.2 Methods to control ignition sources during the performance of maintenance at the plant.
- 4.4 This plan provides guidance to Iberdrola employees for the following:
- 4.4.1 Accumulation of combustible material or combustible waste.
 - 4.4.2 Storage of flammable material.
 - 4.4.3 Controlling ignition sources.
 - 4.4.4 Training requirements for employees with regard to fire prevention.
 - 4.4.5 Inspection and recordkeeping requirements applicable to the Fire Prevention Plan.
- 4.5 Iberdrola maintains a written Hot Work Program which aids in the prevention of fires.

5.0 OTHER PROGRAMS

- 5.1 Iberdrola maintains a number of other written programs and procedures to prevent safety or environmental events from occurring. These include:
- 5.1.1 Work Control Procedure – Manages work that is performed by Iberdrola or contractor personnel at the plant.
 - 5.1.2 Lockout/Tagout – Prevents the release of hazardous energy while personnel are working on equipment.
 - 5.1.3 Fall Protection and Rescue – A comprehensive program which controls who climbs wind turbines and ensures they have the correct training and equipment prior to climbing.

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- 5.1.4 Personal Protective Equipment (PPE) – A program that through assessments, has determined the correct PPE for personnel to wear while performing tasks at the plant.
- 5.1.5 Job Safety Analysis – A process by which employees perform risk assessments and the mitigation of these risks to an acceptable level prior to performing tasks at the plant.
- 5.1.6 Enclosed Space – A comprehensive program which is intended to keep personnel safe in the event they need to enter a Confined Space as defined in 29 CFR §1910.146 or an Enclosed Space as defined in 29 CFR §1910.269.
- 5.1.7 Waste Management – A comprehensive program which provides guidance to plant personnel to minimize, appropriately manage and dispose of any hazardous waste which may be generated at the plant. This program is designed to comply with RCRA requirements.

6.0 TRAINING

- 6.1 All personnel who will be performing any work at the wind plant are required to receive training. This includes emergency response personnel. Training given to emergency response personnel is typically provided prior to them participating in the plant drills.
- 6.2 Groton Wind Plant Management will provide training to applicable emergency response personnel at a date that is mutually agreed upon. This training shall consist of the following:
 - 6.2.1 Plant Specific Safety Orientation
 - 6.2.2 Safety Video
 - 6.2.3 Level A Safety Orientation Training
 - 6.2.4 Level B Safety Orientation Training
 - 6.2.5 Plant tour including assembly areas, emergency response equipment and MSDS (SDS) information. Plant tour route may include the base of a wind turbine; however, no personnel are allowed to climb without a legitimate business purpose.
 - 6.2.6 Question and answer period.
 - 6.2.7 Personnel attending this training shall take a written examination at the end of the training. Passing grade is 80%.

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Acknowledged:

Regu L. Thompson
Title: Fire Chief

Title:

Ronald Utter
Title: Assistant EMS Director

Title:

Kenneth A. Ward
Title: Fire Chief

Title:

John M. Fischer Fischer, John M.
Title: Fire Chief, Hebron

Title:

[Signature]
Title:
IBERDROLA RENEWABLES

Title:

Title:

Title:

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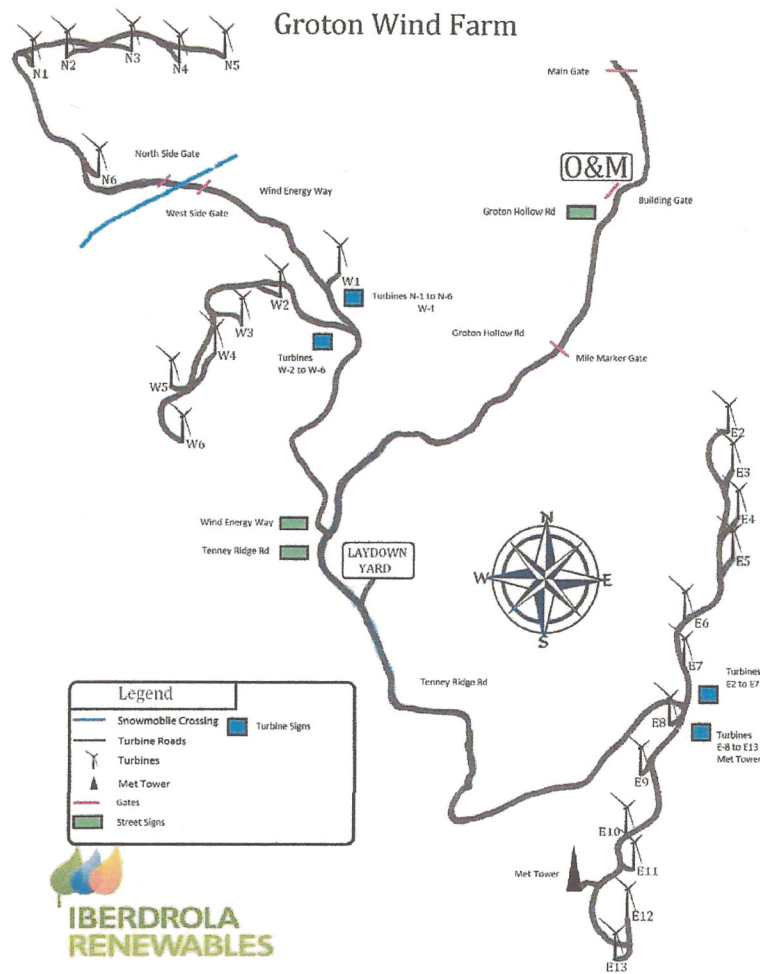


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Appendix A

Plant Map



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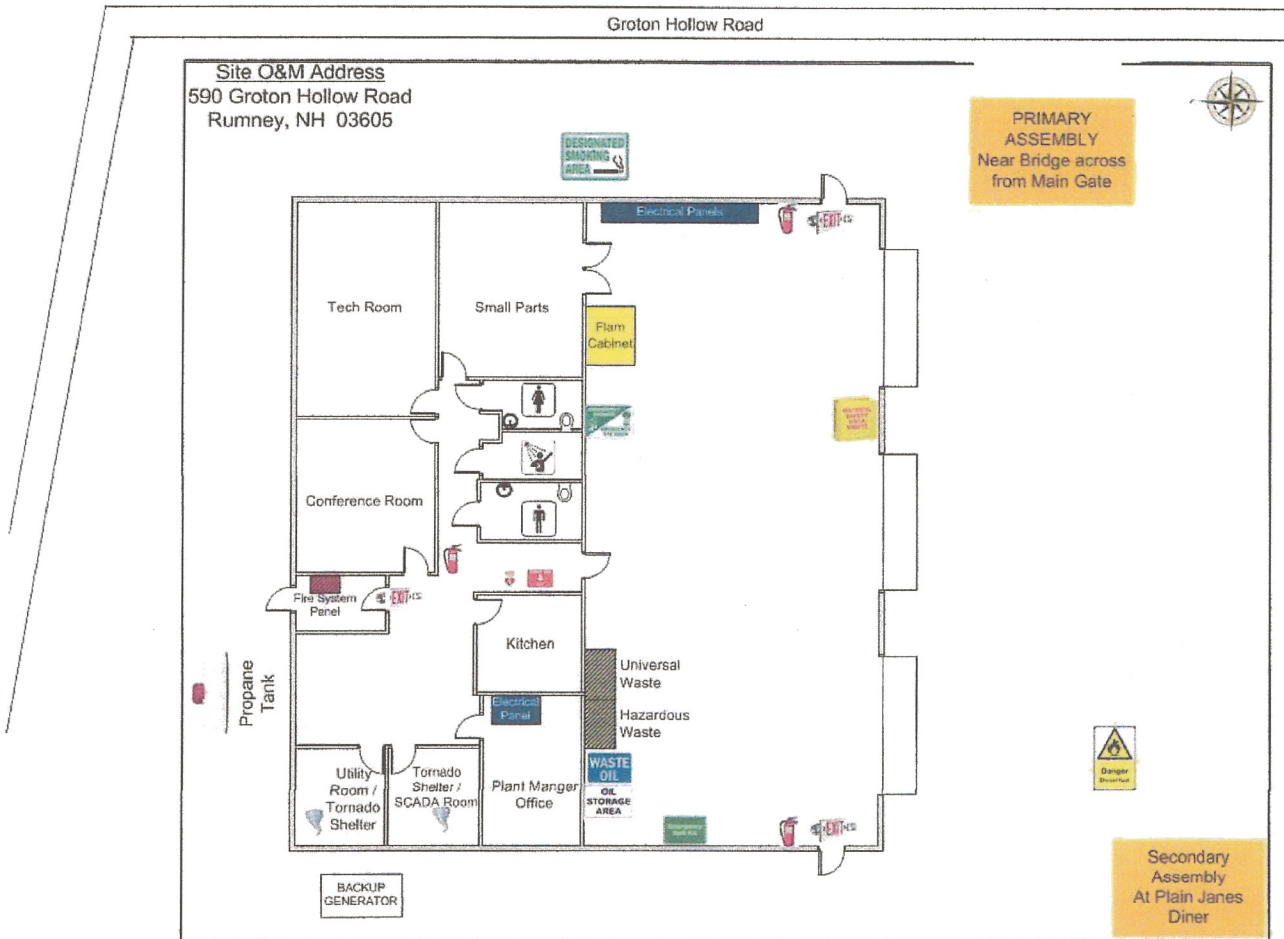


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Appendix B

O&M Building Diagram



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Appendix C

EMERGENCY CONTACT LIST		
EMERGENCY - CALL 911		
SITE EMERGENCY:	Site Address: 590 Groton Hollow Rd. Rummy, NH 03266 Site Phone/Fax: N/A / 815 915 3862 Directions: 1.1 miles south on Groton Hollow Rd.	
	Ryan Haley	815 - 915 - 3862
	Scott Van Haltern	603 - 359 - 3141
<i>Unless otherwise noted, the contact numbers listed below are NON EMERGENCY only</i>		
LAW ENFORCEMENT:	Sheriff Department	603 - 787 - 6911
FIRE:	Rummy Fire Department	603 - 786 - 9924
FBI:		603 - 472 - 2224
HOSPITALS:	Spears Hospital	603 - 886 - 1120
24 HOUR HOTLINE	National Control Center	1 - 866 - 351 - 5657
Regional Director*	Jim Eppley	864 - 871 - 2951
First Point of Contact:	Dennis Winn	503 - 575 - 0897
Other	Stephanie Carey	971 - 285 - 2653
Other	Joshua Lemmon	603 - 443 - 7995
Environmental Protection Agency or State Agency		888 - 372 - 7341
Occupational Health and Safety		603 - 225 - 1629
Poison Control		800 - 222 - 1222
Road Conditions		866 - 282 - 7579
Worker's Compensation		603 - 271 - 3176
Emergency Radio Stations:		N/A - 260-470-4442
Please Post Conspicuously Near Site Phones - Update All When Changes Are Made - Copies are saved on the Wind Ops website 05/2011 Revision 3		

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