DICKINSON WRIGHT PLLC

180 E. BROAD STREET, SUITE 3400
COLUMBUS, OH 43215-3707
TELEPHONE: 614-744-2570
FACSIMILE: 844-670-6009
http://www.dickinsonwright.com

CHRISTINE M.T PIRIK
CPirik@dickinsonwright.com
614-591-5461

April 23, 2025

Ms. Tanowa Troupe, Secretary
Ohio Power Siting Board
Docketing Division
180 East Broad Street, 11th Floor
Columbus, Ohio 43215-3797

Re: Application
Case No. 25-90-EL-BLN
In the Matter of the Application of PowerConneX New Albany, LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Natural Gas Fired Electric Generating Facility to Serve a Data Center in New Albany, Licking County, Ohio.

Dear Ms. Troupe:

Accompanying this letter is an application by PowerConneX New Albany, LLC ("Applicant") for a Certificate of Environmental Compatibility and Public Need to Construct a Natural Gas Fired Electric Generating Facility in New Albany, Ohio. The original application was electronically filed, and the required number of copies both in hard copy and electronic have been provided to the Docketing Division.

Along with this filing, we also provided the Docketing Division copies of the redacted portions of the Application Narrative and have filed a Motion for Protective Order and Memorandum in Support, requesting protective treatment of the confidential information contained therein.

The Applicant further notes that the information presented in the preapplication notification letters filed on January 29, 2025 and March 5, 2025, regarding the anticipated request for waivers has been revised. The Applicant does not anticipate requesting waivers of Ohio Adm.Code 4906-4-08(D)(3), Ohio Adm.Code 4906-4-08(D)(4), and Ohio Adm.Code 4906-4-08(D)(6) at this time. All other information in the preapplication notification letters remains unchanged.

In accordance with Ohio Adm.Code 4906-2-04, we make the following declarations:

Name of the Applicant:

PowerConneX New Albany, LLC
251 Little Falls Dr.
Wilmington, DE 19808

Name and location of the facility:

PCX I
The City of New Albany and Jersey Township
Licking County, Ohio

Name of authorized representative:

Christine M.T. Pirik
Dickinson Wright PLLC
180 East Broad Street, Suite 3400
Columbus, Ohio, 43215
(614) 591-5461
cpirik@dickinsonwright.com

Notarized Statement:

See attached Affidavit of Edmund Wilson,
Chief Operating Officer,
PowerConneX New Albany, LLC

Respectfully submitted,

/s/ Christine M.T. Pirik
Christine M.T. Pirik
(Counsel of Record)
Terrence O'Donnell (0074213)
Matthew C. McDonnell (0090164)
Dickinson Wright PLLC
180 E. Broad Street, Suite 3400
Columbus, Ohio 43215
(614) 591-5461
cpirik@dickinsonwright.com
todonnell@dickinsonwright.com
mmcdonnell@dickinsonwright.com
(*Counsel agrees to receive service by email*.)

Attorneys for PowerConneX New Albany, LLC

Enclosures
4864-9903-4397 v1 [59714-28]

BEFORE THE
OHIO POWER SITING BOARD

In the Matter of the Application of PowerConneX New Albany, LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Natural Gas Fired Electric Generating Facility to Serve a Data Center in New Albany, Licking County, Ohio.	)))))	Case No. 25-90-EL-BLN

OFFICER'S AFFIDAVIT FOR
POWERCONNEX NEW ALBANY, LLC.

STATE OF Ohio :
: ss
COUNTY OF Franklin :

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

1. I am the Chief Operating Officer of PowerConneX New Albany, LLC, which is the applicant under this Application.

2. I have reviewed PowerConneX New Albany, LLC 's Application for a Certificate to Construct a Natural Gas Fired Electric Generating Facility in New Albany, Licking County, Ohio in Case No. 25-90-EL-BLN.

3. To the best of my knowledge, information, and belief, the information and materials contained in the above-referenced Application are true and accurate.

4. To the best of my knowledge, information, and belief, the above-referenced Application is complete.

Edmund Wilson
Chief Operating Officer
PowerConneX New Albany, LLC

Sworn to before and signed in my presence this 23rd day of April 2025.

SUSAN L JOHNSON, NOTARY PUBLIC STATE OF OHIO

Notary Public
Comm. Exp. 3/13/2028

BEFORE
THE OHIO POWER SITING BOARD

In the Matter of the Application of PowerConneX New Albany, LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Natural Gas Fired Electric Generating Facility to Serve a Data Center in New Albany, Licking County, Ohio.	))))))	**Case No. 25-90-EL-BLN**

APPLICATION

Submitted by PowerConneX New Albany, LLC
April 2025

Christine M.T. Pirik (0029759)
(Counsel of Record)
Terrence O'Donnell (0074213)
Matthew C. McDonnell (0090164)
Dickinson Wright PLLC
180 East Broad Street, Suite 3400
Columbus, Ohio 43215
(614) 591-5461
cpirik@dickinsonwright.com
todonnell@dickinsonwright.com
mmcdonnell@dickinsonwright.com

Attorneys for PowerConneX New Albany, LLC

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

LIST OF EXHIBITS

Name	Exhibit Number
Ecological Resources Study	Ex. A
Complaint Resolution Plan	Ex. B
Water Quality Study	Ex. C
Aviation Study	Ex. D
Geotechnical Report	Ex. E
Preliminary Emergency Action Plan	Ex. F
Noise Study	Ex. G
AM/FM Study	Ex. H
Television Study	Ex. I
Radar Systems Study	Ex. J
Microwave Study	Ex. K
Cultural Resources Study	Ex. L

4906-4-01 Purpose and scope

(A) General background and scope

PowerConneX New Albany, LLC (Applicant, PowerConneX, or PCX) proposes to construct and operate a 120-megawatt alternating current (MW) behind-the-meter, natural gas fired, electric generating facility located on an industrial site at 9850 Innovation Campus Way, New Albany, Licking County, Ohio (Project or PCX I).

The materials contained herein and attached hereto constitute the Applicant's submittal (Application) for a Certificate of Environmental Compatibility and Public Need (Certificate). The energy generated from the facility will deliver power to the data center located within the existing industrial warehouse building (referred to herein as the existing building). While this case was initiated under the name PowerConneX, Inc., for corporate reasons, the name of the Applicant has been changed and will, heretofore, be PowerConneX New Albany, LLC.

This Application was prepared following the requirements for the filing of standard certificate applications for electric generation facilities, as described in Ohio Adm.Code Chapter 4906-4. On April 17, 2025, the Ohio Power Siting Board (OPSB) issued an entry granting the Applicant's motion requesting that this Application be reviewed under a 90-day automatic process permitted by Ohio Revised Code (R.C.) 4906.03(F)(2) and in accordance with the 90-day review process set forth in Ohio Adm.Code Chapter 4906-6 for letters of notification, rather than the review process for a standard certificate application set forth in Ohio Adm.Code Chapter 4906-3. Thus, while the outline of this Application tracks the provisions of Ohio Adm.Code Chapter 4906-4, all of the information required by Ohio Adm.Code Chapter 4906-6 is included herein. Furthermore, the case caption of the Application has been revised to reflect that this is a letter of notification application (BLN).

PowerConneX intends to develop two separate facilities on adjacent parcels in New Albany, PCX I and PCX II. PCX I will be developed on an existing industrial site to serve a data center that is located in the existing building on site. PCX II will be developed on a

separate, adjacent parcel of land to the north of PCX I. PCX II will serve a new data center building on the same site. Each facility will operate independently of one another, but both will provide the following benefits to the community.

- **Well paying, sustainable job growth:** Creates significant direct and indirect jobs to the community and state of Ohio.
- **State and local tax revenue:** Contributes new tax revenue to support schools and community investment.
- **Support for Ohio's high-tech sector:** Further bolsters Ohio's high-tech corridor and substantiate the Columbus metros growing reputation as the silicon valley of the Midwest.

(B) Waivers

Because this Application is being submitted as a letter of notification under Ohio Adm.Code Chapter 4906-6 no motions for waiver are necessary at this time.

4906-4-02 Project summary and Applicant information

(A) General purpose of the facility

Energy generated at the facility will deliver power to the existing building that will house a data center. The general purpose of the facility is to provide a reliable and efficient behind-the-meter prime power source to meet the operational needs of a data center located on the same site. Due to constraints on the electric transmission grid system, behind-the-meter power generation provides a reliable source of power to the existing building without impacting customers connected to the grid. The facility is required to provide reliable and resilient electricity to support the critical infrastructure associated with the data center.

(B) General location, size, and operating characteristics of the facility

The facility will be located on approximately 48.6 acres of land within an existing industrial site at 9850 Innovation Campus Way, Licking County, New Albany, Ohio (Project Area). The 48.6 acres are shared between the existing building and the proposed power generation equipment, with approximately 8 acres being utilized for installation of generation and associated support equipment.

The facility generation equipment will consist of containerized, natural gas fired, reciprocating internal combustion engines and natural gas fired linear generators. Each container will be provided with emission controls for compliance with Ohio Environmental Protection Agency (Ohio EPA) requirements. Auxiliary electrical and mechanical systems will be provided on site to support the generation equipment.

The 120-MW generation facility capacity is based on the adjacent data center peak usage effectiveness (PUE) of approximately 1.5. The facility will be designed to operate as a prime power source for the adjacent data center and will operate continuously 24 hours a day, 7 days a week, 365 days a year.

(C) Description of the suitability of the site for the facility

The Project Area site selection analysis concluded that the site meets all necessary factors to support a viable behind-the-meter natural gas generation facility. The size of the site

allows for the installation of required generation equipment, support equipment, and construction staging. The site is zoned primarily for industrial and commercial uses and the parcels contemplated for the Project are within the boundary of an existing industrial warehouse facility. Parcels within the Project Area are zoned primarily for General Employment (GE) with a small portion of Infill Planned Unit Development (IPUD) as indicated on the City of New Albany zoning plan (See 23-0216-Official-Zoning-Map.pdf), which supports the development of a natural gas generation facility. The facility is located near other industrial sites with few environmentally sensitive areas. The facility is situated south of the Technology Manufacturing District with the nearest residential properties abutting the south property line. These residential properties are currently zoned as agricultural but are intended to be developed into retail per the New Albany 2020 Strategic Plan (See 220823-Engage-New-Albany-Strategic-Plan-Updated.pdf). Robust natural gas supply networks in the region enable efficient fuel supply to the Facility.

There are no significant areas of potential visibility beyond two (2) miles from the facility, and there are no recreational/scenic resources, major waterways or landmarks within two (2) miles. There are residential structures located adjacent to the southeast property line of the facility that have visibility. However, these residences have all been purchased for planned commercial/industrial development as shown in City of New Albany's strategic plan for retail space. Elements of the facility that are taller than the existing building are proposed with aesthetic enclosures to minimize visual impacts. Given the predominantly built landscape of the surrounding area and the existing development on the Project site, the overall visual impact of the proposed facility is minimal.

The Project Area is the ideal location for the proposed power generation facility as it allows for co-location with the customer's data center while providing islanded, behind-the-meter power necessary for the development of the existing industrial site on a timeline that meets near term business-critical needs.

(D) Description of Applicant's history, affiliate relationships, and current operations

PowerConneX New Albany, LLC, a wholly owned subsidiary of EdgeConneX, Inc. (EdgeConneX) since 2024, was established to support EdgeConneX's strategic initiatives

in power-constrained markets. EdgeConneX, founded in 2009, is a global data center developer and operator known for delivering innovative and proximate infrastructure solutions ranging from 40 kilowatt (kW) to over 500 MW.

PowerConneX was incorporated to enhance EdgeConneX's capabilities by developing and deploying critical energy infrastructure, including substations, distributed power generation, and transmission assets. This approach enables EdgeConneX to offer best-in-class, grid-independent power solutions tailored to meet the needs of hyperscale data center operators and other energy-intensive users.

PowerConneX specializes in delivering sustainable and reliable on-site power systems that ensure continuous operation while supporting the transition to zero-carbon energy sources. Its solutions are designed to operate independently of local utilities, providing resilience and flexibility for customers.

A comparable project has been successfully developed by EdgeConneX in Dublin, Ireland: a 90-MW, natural gas-fired electric generating facility co-located with a data center. This facility, equipped with Jenbacher reciprocating engines similar to those proposed for the PCX I Project, operates in coordination with the local utility and is primarily utilized during utility load-shedding events.

(E) Future plans for additional generation facilities in region

PCX plans to file a second application with OPSB for a certificate to construct and operate a 216-MW behind-the-meter, natural gas fired, electric generating facility adjacent to and north of PCX I (PCX II). The application for PCX II will be submitted separately (OPSB Case No. 25-302-EL-BGN). The energy generated at the PCX II facility will deliver power to a co-located data center on the same site as PCX II. PCX II will also operate in an islanded arrangement, without a connection to the electric utility grid.

4906-4-03 Project description and schedule in detail

(A) For all applications:

(1) Project schedule and Gantt chart

Table 1 below includes all relevant major Project activities and milestones.

Table 1. Project Schedule

	Q4 2024	Q1 2025	Q2 2025	Q3 2025	Q4 2025	Q1 2026	Q2 2026	Q3 2026
Preparation of the application and studies.								
Submittal of the application for certificate.								
Issuance of the certificate.								
Preparation of the final design.								
Site clearing and prep work.								
Construction of site access.								
Construction stormwater management.								
Earthwork/grading.								
Underground utility installation/relocation.								
Foundations.								
Above-ground structure installation.								
Equipment Installation.								
Exhaust system installation.								
Equipment Commissioning								
Site restoration.								
Placement of the facility in service.								

(2) Construction sequence

Site construction is anticipated to occur between July 2025 and July 2026, followed by plant commissioning to be completed by the end of September 2026. Construction sequencing is outlined as follows.

Construction activities will commence following Certificate issuance by OPSB and receipt of other environmental and regulatory permits. Activities will begin with site preparation and removal and relocation of any remaining existing utilities in conflict with the proposed generation facility. In areas where new generation equipment will be installed, existing asphalt will require removal for relocation of existing utilities and installation of new underground utilities and equipment pads. Existing paving will be maintained to the greatest extent possible. No existing structures require demolition on the proposed site. Grading, site perimeter security and access, construction stormwater management, and underground utilities installation and relocation will be completed, followed by equipment foundations. Deep foundations will be installed to support screen walls and exhaust stack structures. The remaining excavation and grading will be completed followed by the installation of roadway paving, shallow foundations, and equipment curbs. Installation of generation equipment, electrical systems, mechanical systems, and steel structures will occur in parallel. Equipment and structural steel installation is intended to begin on the southeast side of the site and move northwest. Once the equipment has been secured to foundations, auxiliary mechanical and electrical work will begin. When the structural steel is complete, the exhaust system will be installed and connected from the engines to the vertical exhaust structures. After the exhaust installation is complete, each vertical structure will be wrapped with a ventilated metal panel.

As each generation unit installation is complete and final connections are made, testing and commissioning will occur to ensure systems are operating as intended.

At the same time, finish coatings, insulation, site restoration, and landscaping activities will be completed.

(3) Project area description

(a) Area map

The proposed facility is located on the east side of New Albany, Ohio, at 9850 Innovation Campus Way. The site is situated on a single parcel of approximately 48.6 acres in the General Employment zoning district within city limits of New Albany. The site is between the elevations of 1,170 and 1,200 feet according to the United States Geological Survey (USGS) 7.5-minute Series Jersey, Ohio quadrangle (USGS, 1975). Refer to Figure 1 for location of the proposed facility, major population centers and administrative boundaries, electric transmission lines, and named bodies of water within a 2-mile radius. There are no railroads, recreation areas, or landmarks within a 2-mile radius of the proposed facility.

(4) Project proposed installation methods

(a) Proposed site clearing, construction methods, and reclamation operations

(i) Surveying and soil testing

A topographical survey has been completed to map the terrain, including elevation changes, slopes, and natural obstacles. A geotechnical investigation has been completed to determine soil suitability and required improvements. More in-depth information on soil surveying, suitability, and testing can be found in Section 4906-4-08(A)(5).

(ii) Grading and excavation

Grading and excavation will be required to accommodate the modified access roads, generation equipment foundations, and stormwater controls. Excavation is required to remove and relocate existing utilities and installation of new underground utilities and foundations. After completion of underground works, areas will require regrading prior to installation of new pavement and equipment slabs.

(iii) Construction of temporary and permanent access roads and trenches

The site contains existing permanent access roads from public streets that will not require any changes. Modifications to existing paving around the existing building will be required for generation equipment access roads, equipment foundations, and underground utility installation and relocation as shown in Figure 2.

(iv) Stringing of cable and/or laying of pipe

Each piece of generation equipment will have a network of electric cabling that will provide power from the generator into the existing building to serve the data center. Medium voltage cabling will be strung out within the Project Area before being pulled through underground conduits into the existing building. Medium voltage conduits will be installed underground, with concrete encasement, between the generation equipment and the associated transformers, from the transformers to a manhole outside of the existing building, and from the manhole into the existing building. The Project conduit installation will stop at the manhole.

The proposed engine generation equipment will have a network of mechanical piping installed on the site. Each engine will require urea and oil to be piped to each unit from the centralized storage systems. These systems will consist of a main supply and return header located within a concrete trench and branch piping will be installed to each unit. Piping will be laid out with the Project Area before being installed.

All generation equipment will require natural gas fuel piping. Natural gas distribution systems will be installed underground with branch piping to each unit. Pipe installation will require trenching through the Project Area to serve each piece of generation equipment. Piping will be laid within trenches, backfilled and compacted as required by final site plan.

(v) Installation of electric transmission line poles and structures, including foundations

The proposed facility is an electric generation project without connection to electric transmission grid; therefore there will be no electric transmission poles or structures.

(vi) Post-construction reclamation

Post-construction reclamation will include soil stabilization and preservations of soils for future use. Topsoil and subsoil will be collected through the construction process and redistributed to preserve approximate preconstruction capability. Any disturbed areas that will not be used for Project components will be restored to approximate preconstruction quality.

(b) Layout of facilities

A preliminary layout of the generation facility is provided in Figure 2 and Figure 3. Generation and associated auxiliary equipment are located on grade along the northeast and southeast side of the existing building. As shown in Figure 2, permanent access roads are existing on the site from Innovation Campus Way and perimeter security fencing is shown around the entire property with controlled access. Refer to 4906-4-03(B)(4) for a description of the generation facility equipment.

(5) Critical infrastructure information may be redacted

The Applicant is not aware at this time of any redactions needed to protect critical energy infrastructure information. The facility will operate as an islanded electric generation facility with no connection to the grid. Damage to the facility would only impact the co-located data center and would not have impacts on the electric grid.

(B) Electric generation facility

(1) Interactive map

The Project launched its website (https://www.edgeconnex.com/pcx-new-albany-energy-center/) at least 21 days before its first public information meeting (PIM) and before it filed its first preapplication letter. An interactive map was made available on the Project's website at least 14 days before the first PIM that displays all required features with a two-mile radius from the Project Area. The interactive map is available for viewing at the following web address: https://indi5eba4de0d443.maps.arcgis.com/apps/instant/basic/index.html?appid=33ac9cd564d04a73aed75bb41a548bcf. The Applicant plans to update and maintain the map to reflect any significant changes until the end of construction.

(2) Area in acres owned and leased properties, number of properties

The facility will be sited on approximately 48.6 acres.

(3) Examples of alternative generation equipment

Table 2 below outlines the type and quantity of proposed generation equipment, estimated capacity, heat rate, and estimated hours of annual operation. Refer to 4906-4-03(B)(4) for description of generation equipment.

Table 2. Generation Equipment Performance

Unit Type (Model)	Quantity	Capacity (kW)	Heat Rate (BTU/kWh)	Estimated Hours of Operation	Gas Consumption (SCFH)	Estimated Gas Quality (BTU/SCF)
Jenbacher RICE Engine (J624)	28	4,459	7,359	7,200	35,785	917
Jenbacher RICE Engine (J620)	4	3,328	7,819	7,200	28,384	917
Mainspring Linear Generator (MSE3)	16	230	8,416	2,000	2,120	917

(a) Indicative manufacturers, models, specifications, and material safety data sheets for all solar panels, inverters, racking systems, wind turbine models, and all other material components.

The proposed facility does not include solar panels or wind turbines. This section is not applicable. Refer to Table 2 for proposed generation equipment manufacturers and model numbers.

(b) Fuel quantity and quality

Refer to Table 2 for fuel quantity and quality for each generation asset. Gas consumption is determined using the gas quality indicated. It is expected the gas quality on site is better than indicated. As gas quality improves, gas consumption will be reduced.

(c) List of types of pollutant emissions and estimated quantities

Table 3 below includes the estimated total yearly plant emissions in tons per year for PCX I and PCX II. Estimates included below correlate to the potential for both facilities to emit and include proposed redundant equipment. Due to the air permit processing requirements, PCX I and PCX II air permit is considered as a single permit. It is expected the actual facility emissions will be lower than the values included below.

Table 3: Generation Equipment Emissions

Pollutant	*Estimated Emissions – Tons Per Year
Nitrogen Oxides - NOx	126.59
Carbon Monoxide - CO	247.86
Sulfur Dioxide - SO_2	32.73
Total Particulate Matter - $PM_{2.5}$	105.88
Total Particulate Matter - PM_{10}	105.88
Volatile Organic Compound - VOC	186.73
Total Hazardous Air Pollutant- HAP	61.46
Formaldehyde	29.34
Ammonia	125.53

**Air permit process is currently pending with Ohio EPA. Estimated emissions may be updated once air permit process is complete.*

(e) Water volume requirement, source of water, treatment, quantity of any discharge and names of receiving streams

The facility does not anticipate utilizing water at the facility. No water treatment will be required. There will be no facility discharge to a receiving stream.

(4) Information on the construction method, site preparation, and reclamation method, material, color and texture of surfaces, dimensions, and structures

(a) Electric power generation plant

A detailed description of the facility is provided below. The equipment specifications presented in this Application are representative of the options that will be selected for the final procurement of facility components and materials. Any changes in equipment specifications from what is presented here are not expected to increase potential impacts.

As shown in Figure 3 of the Application, Energy Center Layout, the proposed facility design includes a combination of natural gas fired generation equipment including reciprocating internal combustion engines and linear generators. Battery energy storage skids are provided to accommodate the fluctuation in demand from the associated data center. The facility is designed to provide an energy efficient and reliable peak power supply of 120 MW to the co-located data center. All generation and auxiliary equipment will be installed on grade on the northeast side of the existing building at 9850 Innovation Campus Way, New Albany, Ohio. The preliminary facility design consists of the following generation and auxiliary systems:

- Generation Equipment
  - 28 - Containerized Jenbacher J624 Reciprocating Engines
  - 4 - Containerized Jenbacher J620 Reciprocating Engines
  - 16 - Mainspring Model MSE3 Linear Generators
- Auxiliary Equipment

- 12 - Volvo Penta 3MW Battery Energy Storage Skids with Inverters
- 6 - 8,850 gallon Urea Storage Tanks
- 4 - Urea Pumping Skids
- 2 - 5,000 gallon Lubricating Oil Storage Tanks
- 2 - 5,000 gallon Waste Oil Storage Tanks with Integral Pumps
- 2 - Prefabricated Low-Voltage Power Equipment Centers
- 58 - Transformers
- 22 - Switchgear

Each proposed containerized engine includes selective catalytic reduction equipment for emission controls, closed-loop air-cooled heat rejection radiators, compressed air starting systems, container ventilation systems, auxiliary mechanical and electrical systems, and a control room. Auxiliary mechanical systems (i.e., urea and lubricating oil) will be routed from the storage tanks through site piping to each container. Low voltage electricity will be provided to each container from the associated power equipment center through conduits installed on the site.

Engine exhaust from each reciprocating engine will be installed along intermediate structures from the container to a common vertical structure. Eight vertical structures will be provided to collect exhaust from each group of 4 engines. Each vertical structure will include silencers prior to exhaust outlet. The proposed exhaust outlet termination height is estimated between 65-85 feet above grade in compliance with Ohio EPA standards. Once Ohio EPA has provided information for air permit modeling, these heights may be updated.

(b) All proposed storage facilities, including those for fuel, waste, water, and hazardous chemicals

The site will require storage facilities for selective catalytic reduction agent (urea) and lubricating oil systems. The facility will require 6, 8,850 gallon urea storage tanks, 4 urea pumping skids, 2, 5,000 gallon lubricating oil storage tanks, and 2, 5,000 gallon waste oil storage tanks. Each tank is anticipated to be provided with double wall construction for containment.

(c) All proposed processing facilities, including those for fuel, waste, water, and hazardous chemicals

No processing facilities are currently anticipated for the facility. Fuel quality requirements are currently under review. While a natural gas conditioning skid is not anticipated at this time, once additional review is complete, if a skid is needed, the Applicant will update OPSB.

(d) Water supply, effluent, and sewage lines

The facility does not anticipate a connection to the municipal water or sewer lines for the generation equipment.

(e) Associated electric collection, transmission and distribution lines and gas pipelines

The facility will not have a connection to the electric transmission system. Power will be generated by the facility and provided directly to the co-located data center.

The Applicant is working with a Local Distribution Company (LDC) to bring the required natural gas capacity to the site. The LDC will submit the pipeline project application separately to the OPSB. It is expected the LDC will provide a delivery pressure that is sufficient for the proposed equipment. A compressor station is not required. Fuel quality requirements are currently under review. While a natural gas conditioning skid is not anticipated at this time, once additional review is complete, if a skid is needed, the Applicant will update OPSB.

(f) Substations, switching substations, and transformers

The Project will not include substations, switching substations, and associated transformers. The proposed facility will not be grid-connected.

(g) Temporary and permanent meteorological towers

The facility does not include the installation of meteorological towers.

(h) Transportation facilities and proposed upgrades, access roads, and crane paths

The site is located in close proximity to a strong transportation network, including several major highways (Interstate 270 and OH-161). Since the site was previously developed, permanent access is provided off Innovation Campus Way, which extends west off Mink Street. Permanent access to the site is approximately 0.5 miles from OH-161, which will minimize impacts to local traffic.

(i) Construction laydown areas

The Project Area will be utilized for construction staging. Existing paved areas and grassland area to the northwest of the facility will be used for laydown and staging for the generation facility. The existing grassland area will be graded to serve as a staging and laydown area. Once the area is no longer required for staging or laydown, it will be converted to a stormwater basin to serve PCX I and PCX II. Existing paving on site will require removal for relocation and removal of existing utilities, installation of new utilities, access roads, and equipment pads. Refer to Figure 2 of the application, Preliminary Site Plan, for areas where paving will be replaced. The Applicant anticipates starting installation on the southeast side of the site and moving northwest. This will maximize available space in the Project Area for staging and laydown.

(j) Security, operations, and maintenance facilities or buildings

The public does not have access to the private facility. Additionally, efforts will be made to prevent unauthorized site access with a combination of

perimeter security fencing, controlled access gates, signage, and site monitoring.

(k) Other pertinent installations

No additional installations are anticipated.

(5) Map of the Project Area

(a) An aerial photograph

Refer to Exhibit 5 within Ecological Resources Study, Exhibit A to this Application – for aerial of Project Area.

(b) Proposed facility, including all components listed in paragraph (B)(4) of this rule

Refer to Figure 2 Preliminary Site Plan of this application, for the preliminary facility layout including items outlined in paragraph (B)(4)(a).

(c) Road names

Refer to Figure 1 Area Map of this application, for map of Project Area with road names.

(d) Property lines

Refer to Figure 1 Area Map of this application, for map of Project Area with property boundary.

(C) Electric power transmission or gas pipeline

This section is not applicable since the Project is a natural gas fired electric generation facility. The Project will not include electric transmission lines. Natural gas will be delivered to the facility via a local utility.

(D) Basis of need for electric power transmission line

This section is not applicable since the Project is a natural gas fired electric generation facility.

(E) Gas pipeline

Natural gas will be provided to the facility by a local operator and will be submitted as a separate application to the OPSB at a later date.

4906-4-04 Project Area selection and site design

(A) Description of the Project Area selection

(1) Description and rationale for selecting study area or geographic boundaries

The Project Area is located near New Albany, Ohio and is approximately 5 miles east of Johnstown and 22 miles from Columbus, Ohio. The Project Area is bordered by Jug Street, Mink Street, and Innovation Campus Way. The Project Area was evaluated as a brownfield development opportunity due to the existing building, which is suitable for a data center as well as sufficient acreage surrounding the existing building, when accounting for easements and regulatory requirements, for placement of the supporting facility.

(2) Map of study area

Refer to Figure 4 Study Area of this application, for an aerial map with the boundary of the study area.

(3) List and description of all qualitative and quantitative siting criteria

The site location for PCX I was selected based on a consideration of a range of key characteristics for a successful project. Upon selection of this site a range of issues was considered prior to initiating engineering and environmental activities necessary for completion.

- Adequate space for the facility and generation equipment.
- Land availability.
- Cost and constructability.
- Compatible zoning and land use.
- Natural gas supply and availability.
- Air quality, noise, and visual impacts.
- Ecological and cultural resource impacts.

(4) Description of the process and how the Applicant used the siting criteria

The siting criteria for PCX I was reviewed internally to evaluate the positives and negatives of the site and the overall cost, as well as risk in pursuing development. If approved internally, customers are then approached to further evaluate interest in the development and securing lease agreements to support a path forward. The business then proceeds with development.

The Project Area site selection analysis concluded that the site meets all necessary factors to support a viable behind-the-meter natural gas generation facility. Behind-the-meter generation facilities require an electric consumer to be co-located on the same site, or within reasonable proximity of the generation facility. This requires the site to be suitable for not only the generation facility but also the electric consumer. The items outlined previously under Section 3 were evaluated and the site was determined to be suitable for the generation facility.

(5) Description of Project Area selected for evaluation

Project areas considered must be located in an area with sufficient supplies of natural gas in order to provide an adequate supply of fuel. Other factors included zoning, land availability, cost and constructability, air quality impacts, noise impacts, visual impacts, resource impacts, and the siting of the power generation equipment and auxiliary equipment.

The site had to be in an area with willing land lessor or seller, as well as a host community. The site needed to be accessible to accommodate equipment delivery, construction, and operation and maintenance activities.

The facility siting required an area that did not interfere with any ecological or cultural resources.

The siting criteria identified the Project Area as a good opportunity for development primarily as it is a brownfield site with the existing building ideal for housing a new

data center with some modifications. A customer was also identified that supported this development.

(B) Process for designing facility layout

The facility layout and site design were based on a number of factors. The site already had an existing building that will be repurposed. The selection of engines determine the layout of the generation equipment, as well as environmental factors such as air compliance rules and noise considerations. There is also a high voltage power line in the area with an easement that contributed to the site layout.

(1) Constraint map

Refer to Figure 5 – Constraint Map indicating setbacks, property lines, utility corridors, and public right-of-way.

(2) Criteria used to determine site layout/comparison of alternative designs

The facility layout and site design were based on a number of factors. The site already had an existing building that will be repurposed. The selection of generation and auxiliary equipment was based on site availability and environmental factors such as air compliance rules and noise considerations. Visual impacts were minimized by locating generation equipment behind the existing building. There is also a high voltage power line in the area with an easement that contributed to the site layout constraints.

(3) Number and types of comments received

The Applicant held two PIMs on February 19 and March 26, 2025. Notice of the PIMs was served on property owners and tenants potentially affected by the Project, as well as the city, county, and township public officials and agencies, the local library, and the school district. The PIMs were also noticed in the *Newark Advocate* and the *Columbus Dispatch*. None of the attendees at either meeting provided comments on the available comment cards. Additional detail regarding the PIMs is described in Section 4906-4-06(E)(1) of the Application.

4906-4-05 Electric grid interconnection

(A) Connection to the regional electric grid

(B) Interconnection information

(1) Generation interconnection request information

(2) System studies on generation interconnection

This section is not applicable as the proposed facility will not be connected to the local or regional electric grid.

4906-4-06 Economic impact and public interaction

(A) Ownership

PowerConneX New Albany, LLC, a wholly owned subsidiary of EdgeConneX, Inc. since 2024, was established to support EdgeConneX's strategic initiatives in power-constrained markets. EdgeConneX, founded in 2009, is a global data center developer and operator known for delivering innovative and proximate infrastructure solutions ranging from 40 kW to over 500 MW.

(B) Construction costs

(1) Estimated capital and intangible costs for various alternatives

The Applicant is not a utility company. The preliminary estimated capital and intangible costs of the Project are approximately $[redacted]. Total costs for the Project may vary depending on final design considerations. These costs are broken out in Table 4 below based on current project estimates. No Project alternatives are being considered so no cost comparison can be developed.

Table 4: Estimated Capital and Intangible Costs

Tangible Costs	
Equipment and Installation Costs	$[redacted]
Mechanical and Electrical Costs	$
General Construction Costs	$
Total Tangible Costs	$
Intangible Costs	
Development and Management	$
Other	$
Total Intangible Costs	$
Total Cost	$
Cost per kW	$

(2) Cost comparison with similar facilities

The Applicant does not have similar operational facilities to compare costs too.

(3) Present worth and annualized capital costs

No Project alternates are being considered so no cost comparison can be developed.

(C) Operation and maintenance expenses

(1) Estimated annual operation and maintenance expenses

The Applicant is not a utility company. Total operations and maintenance (O&M) costs are estimated at $[redacted] annually. At this time, the first two years O&M costs are estimated at $[redacted] and exclude natural gas costs.

(2) Operation and maintenance cost comparison

No similar facilities are currently in operation for comparison. A site is coming online in Dublin, Ireland in 4Q 2025 and at that time the O&M approach for this proposed site will be evaluated against those costs to identify any differences.

(3) Present worth and annualized cost for capital costs

No Project alternates are being considered so no cost comparison can be developed.

(D) Economic impact of the facility

An analysis of the economic contribution of the planned energy center complex in New Albany, Ohio was performed. The complex, with its state-of-the-art infrastructure and advanced technological capabilities, is expected to generate a significant contribution to the local economy, driving job creation and economic growth. The analysis highlights the following key findings:

- **Job Creation**: The construction and operation of the energy center in New Albany, Ohio, will create a substantial number of employment opportunities in the Columbus Metropolitan Statistical Area (MSA). During the construction phase, a large number of jobs will be generated, including both direct and indirect employment. Additionally, once operational, the energy center will require a skilled workforce to manage and maintain its facilities, leading to continued job growth in the long term.

- **Economic Output**: The establishment of the planned the energy center in New Albany, Ohio, will contribute to the overall economic output of the region. It is projected that it will attract businesses and organizations, creating a ripple effect on the local economy. This increased economic activity will result in additional job

opportunities and higher incomes for residents, leading to increased consumer spending and overall economic growth.

- **Tax Revenue**: The planned energy center's presence will have a positive effect on local tax revenue. As the facility generates economic output and employment, it will contribute to both direct tax revenue from its operations, indirect tax revenue from increased economic activity in the surrounding area, and induced tax revenue when employees at the complex and throughout its supply chain spend their income. These tax revenues can be utilized by local authorities to invest in infrastructure, education, healthcare, and other essential public services.

The Applicant is in the process of finalizing the analysis for the PCX I portion of the energy center complex in New Albany, Ohio. Once the analysis is complete, the Applicant will provide the information to OPSB.

(E) Public responsibility

(1) Public interaction

The Applicant has made significant efforts to engage the local community and address any potential concerns.

The Applicant held two PIMs on February 19 and March 26, 2025. Notice of the PIMs was served on property owners and tenants potentially affected by the Project, as well as the city, county, and township public officials and agencies, the local library, and the school district. The PIMs were also noticed in the newspaper. Positive feedback was received at both PIMs, although no written comments were received as described above. At the first PIM, the Project team addressed questions about an unrelated project (liquefied natural gas plant) that is being proposed south of the Project Area, the pipeline location, noise from the plant and questions on what the plant would look like. Many of the attendees used the interactive map to view their residence in relation to the facility. At the second PIM, no elected officials were in attendance and the attendees were a mix of labor and people with vested interest in the Project.

The following key stakeholders attended the first PIM:

- Chip Fellows, City of New Albany Councilman (and his wife)

- Joseph Stefanov, City of New Albany City Manager
- Sara Ziegler, Economic Development Manage, City of New Albany
- Rick Platt, President and CEO, Licking County Port Authority
- Kristy Hawthorne, Administrator, Licking County Soil and Water
- Scott Ryan, Chief of Community Engagement, Ohio Department of Development
- Brian Bemiller, Fire Chief at Monroe Township
- Cherie Nelson, Executive Director, New Albany Chamber
- Frank Uhl, Jason Baker, and Paul Dixon from Operating Engineers, Local 18
- Two individuals from the Carpenters Union
- Paul Briggs, Director of Government Affairs and Econ Dev, Enbridge

The following key stakeholders attended the second PIM:

- Dale Arnold, Ohio Farm Bureau Federation
- Sara Zeigler, Economic Development Manager, City of New Albany
- Scott Ryan, Ohio Department of Development
- Individuals of the Operating Engineers, Local 18

The Complaint Resolution Plan for the Project is included as Exhibit B, of this application which includes plans for preconstruction and pre-operation notices, preconstruction updates to the plan, and filing the plan on the public docket for the case.

(2) Liability insurance and corporate programs

The Applicant is in the process of finalizing the liability insurance and will provide the information once it is complete.

(3) Impact to roads and bridges

A review of heavy equipment delivery routes was conducted to assess and establish appropriate routing strategies, taking into account various factors such as load capacity, width requirements, steerability, and additional constraints. The proposed routes underwent preliminary reviews and consultations with both the Ohio Department of Transportation (ODOT) and Licking County authorities.

Following the feedback received during these reviews, it was determined that all current routes are adequate, and there are no sections deemed unsuitable for traversal. Furthermore, no adverse impacts to the integrity of roads or bridges are

anticipated, and no repairs are expected to be required as a result of the routing plan.

The site has existing permanent entrances off Innovation Campus Way that will be utilized for construction traffic. These entrances are located approximately 0.5 miles from OH-161. Utilizing the existing entrances will minimize disruptions to local traffic along Mink Street. Due to the proximity of the site entrances to OH-161, impacts from construction traffic are not anticipated. A complete transportation plan will be coordinated with local authorities.

(4) Transportation permits for construction and operation

The Applicant will finalize the delivery route plan, ensuring all necessary transportation permits for oversized or overweight units are obtained from the ODOT. Currently, no transportation permits are required from Licking County.

While not anticipated at this time, the Applicant will coordinate with the relevant authorities, if needed, to address temporary or permanent road closures, lane closures, road access restrictions, and traffic control measures essential for the Project's construction and operation.

(5) Plan for decommissioning

The Project is designed to meet and sustain the energy requirements of the data center for a minimum of 15 years. Following the completion of the facility's designed operational life, a comprehensive evaluation will be conducted to assess the current and future power demands, as well to identify feasible options for ensuring continued power supply to the data center. All financial provisions along with the necessary resources for decommissioning and site restoration, will be clearly articulated and documented in the lease/operating agreement.

(6) Counties, townships, villages, and cities

The Project Area is located within Jersey Township, Licking County, and the city limits of New Albany.

(7) Public officials

The list of the public officials contacted regarding the application is provided below in Table 5:

Table 5: Contacted Public Officials

Stakeholder	Name	Address	City	State	Zip	Email	Phone
Licking County Commissioners	Duane Flowers, President	20 S. Second St.	Newark	Ohio	43055	dflowers@lickingcounty.gov	740-670-5110
Licking County Commissioners	Rick Black, Vice President	20 S. Second St.	Newark	Ohio	43055	rblack@lickingcounty.gov	740-670-5110
Licking County Commissioners	Timothy Bubb	20 S. Second St.	Newark	Ohio	43055	tbubb@lickingcounty.gov	740-670-5110
Licking County Planning Commission	Brad Mercer Planning Manager	20 S. Second St.	Newark	Ohio	43055	BMercer@lickingcounty.gov	740-670-5200
Licking County Engineer	Jared Knerr, P.E., P.S.	20 S. 2nd Street	Newark	Ohio	43055	jknerr@lickingcounty.gov	740-670-5280
New Albany Mayor	Sloan Spalding, Mayor	99 W. Main St.	New Albany	Ohio	43054	mayor@newalbanyohio.org	614-939-4019
New Albany City Council	Matt Shull, President Pro Tempore	99 W. Main St.	New Albany	Ohio	43054	mshull@newalbanyohio.org	614-939-4024
New Albany City Council	Andrea Wiltrout	99 W. Main St.	New Albany	Ohio	43054	awiltrout@newalbanyohio.org	614-939-4020
New Albany City Council	Kasy Kist	99 W. Main St.	New Albany	Ohio	43054	kkist@newalbanyohio.org	614-939-4025
New Albany City Council	Marlene Brisk	99 W. Main St.	New Albany	Ohio	43054	mbrisk@newalbanyohio.org	614-939-4021
New Albany City Council	Mike Durik	99 W. Main St.	New Albany	Ohio	43054	mdurik@newalbanyohio.org	614-939-4022
New Albany City Council	Chip Fellows	99 W. Main St.	New Albany	Ohio	43054	cfellows@newalbanyohio.org	614-939-4023
New Albany City Council	Joseph Stefanov, City Manager	99 W. Main St.	New Albany	Ohio	43054	admin@newalbany.org	614-855-3919
New Albany Economic Development	Jennifer Chrysler, Director	99 W. Main St.	New Albany	Ohio	43054	jchrysler@newalbany.org	614-939-2259
Jersey Township Trustees	Dan Wetzel	1481 Mink Street SW	Pataskala	Ohio	43062	dwetzel@jerseytownship.us	740-927-0331
Jersey Township Trustees	Jeff Fry	1481 Mink Street SW	Pataskala	Ohio	43062	jfry@jerseytownship.us	740-258-1498
Jersey Township Trustees	Ben Pieper	1481 Mink Street SW	Pataskala	Ohio	43062	bpieper@jerseytownship.us	614-679-2288
Jersey Township Trustees	Marko Jesenko, Fiscal Officer	1481 Mink Street SW	Pataskala	Ohio	43062	fo@jerseytownship.us	614-395-5054
Columbus Metropolitan Library, New Albany Branch		200 Market St.	New Albany	Ohio	43054	N/A	614-645-2275
Licking County Chamber of Commerce	Jennifer McDonald, CEO	50 W. Locust Street, P.O. Box 702	Newark	Ohio	43058	jmcdonald@lickingcountychamber.com	740-345-9757
New Albany Chamber of Commerce	Cherie Nelson, Executive Director	55 W Main St	New Albany	Ohio	43054	N/A	614-855-4400
Johnstown-Monroe School District	Dr. Philip H. Wagner	85 W. Douglas Street	Johnstown	Ohio	43031	pwagner@jmk12.org	740-967-6846

(8) Complaint resolution process for certificates issued after May 30, 2024

The Complaint Resolution Plan for the Project is included in this application as Exhibit B. The Applicant will file the final complaint resolution plan on the public docket and provide notifications at least 7 days before construction and facility operations begin. These notices will be sent via mail to affected property owners, residents within one mile of the Project, public officials, emergency responders, and other relevant parties, including those who have requested updates. The notices

will include Project details, contact information, and a copy of the complaint resolution plan. Additionally, the Applicant will confirm compliance with all preconstruction and construction-related conditions before commencing work and facility operations, providing timelines for these activities. During the first 5 years of facility operation, the Applicant will submit semi-annual complaint summary reports detailing complaints received, actions taken, and unresolved issues while ensuring complainant identities remain protected upon request. All preconstruction notices and complaint summaries will also be filed on the public docket.

4906-4-07 Compliance with air, water, solid waste, and aviation regulations

(A) Explanation of information requested in this rule

This section provides environmental data and information regarding air, water, and solid waste in terms of site conditions, and potential impacts/mitigation measures of the proposed facility. The Applicant will comply with the regulations and required permits that pertain to air, water, solid waste, and aviation.

(B) Information on compliance with air quality regulations

(1) Preconstruction air quality and permits

(a) Ambient air quality

The proposed facility will be located in Licking County, which is designated "in attainment" or "unclassifiable" for all regulated pollutants. The current attainment designations for Ohio can be found in 40 CFR 81.336.

(b) Air pollution control equipment

Refer to Table 6 below for emission control equipment for generation equipment. Table 6 includes the air pollutants considered in the air application which are as follows: Nitrogen Oxides (NOx), Carbon Monoxide (CO), Sulfur Dioxide (SO_2), Total Particulate Matter 2.5 (Total PM2.5), Total Particulate Matter 10 (Total PM10), Volatile Organic Compounds (VOC), Total Hazardous Air Pollutants (Total HAP), Formaldehyde (CH_2O), Ammonia (NH_3). Emergency Diesel Engines are certified by the manufacturer to specific emissions standards set by the United States Environmental Protection Agency (US EPA) to control emissions. Selective Catalytic Reduction (SCR) is an emissions control technology designed to reduce NOx in exhaust gases. The process injects a reductant, such as ammonia or urea, where it reacts with NOx over a catalyst. The chemical reaction converts NOx into nitrogen and water vapor.

Oxidation Catalyst reduce emissions like CO and VOCs. These catalysts facilitate chemical reactions that convert pollutants into CO_2 and water.

Table 6: Emission Controls Equipment

Fuel Type	Equipment Description	Pollution Control Equipment	Potential Emissions Applicability								
			NO_X	CO	SO_2	Total PM2.5	Total PM10	VOC	Total HAP	CH_2O	NH_3
Diesel	CAT C18 750 KW Diesel Emergency Generator	NSPS Tier II Certified	X	X	X	X	X	X	X	X	-
Diesel	*CAT C13 350 KW Diesel Emergency Generator	NSPS Tier III Certified	X	X	X	X	X	X	X	X	-
Natural Gas	Jenbacher J620 Engines	SCR, Oxidation Catalyst	X	X	X	X	X	X	X	X	X
Natural Gas	Jenbacher 624 Engines	SCR, Oxidation Catalyst	X	X	X	X	X	X	X	X	X
Natural Gas	*Wartsila 18V50SG	SCR, Oxidation Catalyst	X	X	X	X	X	X	X	X	X
Natural Gas	Mainspring MSE Generator	Oxidation Catalyst	X	X	X	X	X	X	X	X	-

** Equipment associated with PCX II project. Equipment is only included in the chart because it is included in the single air permit application. Air permit process is currently pending with Ohio EPA. Estimated emissions may be updated once air permit process is complete.*

(c) Air quality standards and limitations

The Applicant has filed a Permit to Install (PTI) with the Ohio EPA for the operation of 22 proposed generators and 47 proposed generator and engines for this Project.

This section presents information to demonstrate compliance with potentially applicable federal and state air permitting and regulatory requirements for the proposed Project. Specifically, the applicability of the Project to Major New Source Review (NSR), Title V permitting, New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and Ohio Adm.Code 3745 regulations are addressed.

The federal NSR program regulates the installation of new major sources or major modifications to existing major sources. The NSR permitting regulations are comprised of 2 programs: 1) Prevention of Significant Deterioration (PSD) for projects located in areas where specified pollutant levels have met National Ambient Air Quality Standards (NAAQS); and 2) Nonattainment New Source Review (NANSR) for projects located in areas where pollutant levels have not attained the corresponding NAAQS. Ohio EPA's federally approved state implementation plan (SIP) includes specific provisions in Ohio Adm.Code 3745-31 governing the application of the NSR program in the State of Ohio. The proposed facility will be located in Licking County, which is designated "in attainment" or "unclassifiable" for all regulated pollutants. Therefore, the applicability of PSD must be reviewed, and NANSR is not applicable to the Project. Due to the classification of source category, PSD was determined to not be required as this is a minor source with respect to NSR.

The Title V operating permit program consolidates state and federal requirements applicable to major sources into a single comprehensive operating permit for the purposes of facilitating ongoing compliance. In accordance with Ohio Adm.Code 3745-77, sources with a potential to emit of 100 tons per year (tpy) or more for criteria pollutants, 25 tpy or more for Total HAP, or 10 tpy or more for individual HAP are considered major sources for which applicants must obtain a Title V operating permit. The facility is classified as a major source for Title V purposes.

The proposed engines are subject to NSPS under 40 CFR 60. The following outlines each NSPS standard to which the facility is potentially subject:

- Affected sources under NSPS IIII include owners or operators of compression ignition (CI) internal combustion engines (ICE) that commenced construction after July 11, 2005 where the CI ICE are manufactured after April 1, 2006 pursuant to 40 CFR 60.4200(a)(2). The proposed diesel-fired emergency generators will be subject to NSPS IIII.

- Affected sources under NSPS JJJJ includes owners or operators of spark ignition (SI) ICE that commenced construction after June 12, 2006, and were manufactured on or after July 1, 2007, that have a maximum engine power greater than 500 horse power (HP).
    - Linear generators do not meet the definition of an internal combustion engine and are therefore no subject NSPS JJJJ.

The facility is subject to NESHAPs, located in 40 CFR 63, are typically applicable to specific categories of sources that have the potential to emit HAP in levels greater than 10 tpy for any individual HAP or 25 tpy for any combination of HAP (i.e., major HAP sources). The following outlines the NESHAP standard that the facility is potentially subject:

- 40 CFR 63 Subpart ZZZZ (MACT ZZZZ) applies to reciprocating internal combustion engines (RICE) located at a major or area source of HAP emissions. The proposed natural gas-fired engines and emergency diesel generators will be classified as "new" RICE because they have a rating greater than 500 HP will be constructed after June 12, 2006, at a major source of HAP emissions pursuant to 40 CFR 63.6590(a)(2)(i).

- The proposed linear generators do not meet the definition of a RICE as internal combustion does not occur. Therefore, the linear generators are not subject to MACT ZZZZ.

- The proposed emergency diesel generators will be subject to limited requirements under 40 CFR 63.6590(b)(1) and the applicant will be required to submit an initial notification under 40 CFR 63.6645(f).

Ohio Adm.Code 3745-17-07(A) limits visible particulate emissions from all stacks to less than 20% opacity, as a six-minute average, except during periods of startup, shutdown, and malfunction specified in the rule. However, visible emissions may exceed 20% opacity, as a six-minute average, but not for more than six consecutive minutes in any one-hour period. Visible emissions may not exceed 60% opacity, as a six-minute average, at any time. The exhaust stacks associated with the emergency generators, linear generators, and engines will be subject to this visible emissions standard.

(d) List of required permits to install and operate air pollution sources

The Applicant has filed a PTI application, as required by the Ohio EPA for the installation of the equipment at this location. The final permit for the facility has not been issued at the time of this Application. An update will be provided once the permit have been issued.

(e) Except for wind farms and solar facilities, air quality map

Refer to Figure 6, Air Monitoring Stations, of this Application, for locations of air monitoring stations and Figure 3, Energy Center Layout, of this application, for air pollution point sources. Refer to Table 7 for coordinates and elevations of air monitoring stations.

Table 7: Air Monitoring Station Locations

Air Agency ID	Site Name and Address	Latitude	Longitude	Elevation
39-049-0029	New Albany- 7600 Fodor Road, New Albany	40.084514	-82.815585	311 Meters
39-061-0040	Taft NCore PAMS-250 William Howard Taft, Cincinnati	39.12886	-84.50404	256 Meters

(f) Compliance with permits and standards

The Applicant has filed a PTI application, as required by the Ohio EPA for the installation of the equipment at this location. The final permit for the facility has not been issued at the time of this Application. An update will be provided once the permit have been issued.

(2) Plans to control emissions and fugitive dust during site clearing and construction

Although no offsite impacts are anticipated, the Applicant will control fugitive dust as needed. The Applicant will control dust utilizing best management practices (BMPs) such as watering the road as needed. The Applicant will work with local stakeholders and officials to assure visibility is not impaired and dust does not accumulate offsite.

No issues or concerns regarding air emissions are anticipated. Construction vehicles and equipment will be equipped with standard air pollution control equipment in compliance with applicable state and federal standards. Vehicles and equipment will be maintained and in good working condition to minimize emissions from construction-related activities.

(3) Except for wind farms and solar facilities, information on air quality during operation

(a) Ambient air quality monitoring

The Applicant has filed a PTI application, as required by the Ohio EPA for the installation of the equipment at this location. Once the permit is issued, the Applicant will comply with any applicable ambient air quality monitoring requirements.

(b) Map of estimated concentrations in excess of significant emissions rates

The Applicant has filed a PTI application, as required by the Ohio EPA for the installation of the equipment at this location. Once the modeling is deemed complete, the applicant will provide an update and will provide the requisite map to OPSB.

(c) Procedures if air pollution control equipment fails

The Applicant has filed a PTI application, as required by the Ohio EPA for the installation of the equipment at this location. Once the permit is issued,

the Applicant will comply with any applicable procedures for air pollution control equipment failure.

(C) Information on compliance with water quality regulations

(1) Preconstruction water quality and permits

(a) List of permits

As described in the Water Quality Study, Exhibit C of this Application, a list of all permits required to install and operate the facility, including water pollution control equipment and treatments processes is shown below:

- Ohio National Pollutant Discharge Elimination System (NPDES) permit – The exterior storage of uncovered, erodible materials or similar operations is not anticipated: therefore a NPDES permit should not be required for operation of the facility. However, if more than one acre of earth is disturbed during construction, a Notice of Intent (NOI) and Stormwater Pollution Prevention Plan (SWPPP) for the NPDES Construction General Permit coverage will be required for construction activities.

- The City of New Albany has requested a new Site Development Permit if additional tributary areas are added to the existing basins or additional impervious areas are added. A new Site Development Permit has been submitted to the City of New Albany.

Furthermore, the Water Quality Study, Exhibit C of this Application, indicated that the following permits are not required of the facility:

- Section 404 of the Clean Water Act
- Water Quality Certification Section 401 from the Ohio EPA
- Ohio Isolated Wetland Permit
- Wastewater Discharge Permit

(b) Water quality map

This section is not applicable. No water quality sampling was necessary because the existing site already has stormwater basins in place, which were implemented under a previously approved NPDES permit. The site is located at the far northern extent of the Headwaters South Fork Licking

River watershed (HUC 05040006-04-02). The closest USGS stream gauge is in Kirkersville, more than 17 miles downstream. The closest Ohio EPA water quality monitoring location is at Cable Road outside Pataskala, which is more than 7 miles downstream. Ohio EPA data has not been updated since 2008.

(c) Water monitoring and engagement stations

There are no known existing water monitoring or engagement stations in existence on the property. There is no water treatment or water discharges on the property that require monitoring. There are no known water monitoring sites near the property.

(d) Existing water quality of receiving stream

According to the Water Quality Study Exhibit C, of this Application there will be no water quality impacts during preconstruction since the existing site already has stormwater basins in place.

(e) Permit application data

No water discharge permits from state or federal agencies are anticipated for this facility.

(2) Construction water quality

(a) Water quality map

This section is not applicable. Refer to response noted above regarding permits in Section 4906-4-07(C)(1)(a).

(b) Estimate of quality and quantity of aquatic discharges

Discharges are not anticipated to occur in association with the construction of the facility that would impact aquatic resources.

(c) Mitigation plans

A NOI will be submitted for NPDES coverage and a SWPPP will be prepared as more than one acre is expected to be disturbed during construction. The SWPPP will be followed and once the construction activities are complete, the site will be stabilized, and the permit coverage will be terminated once the closure requirements have been met.

(d) Changes in flow patterns and erosion due to clearing and grading

No changes in flow patterns or erosion are anticipated from grading activities. The Project site is mostly flat and existing drainage patterns will be maintained to the greatest extent possible.

(e) Equipment for control of effluents discharged into water and streams

The facility will not discharge effluents into bodies of water or receiving streams. A NPDES construction general permit with a SWPPP will be in place and maintained to minimize impacts from construction erosion and sediment runoff.

(3) Operation water quality

(a) Water quality map

This section is not applicable. Refer to response noted above in Section 4906-4-07(C)(1)(a).

(b) Water pollution control equipment and treatment process

There will be no water treatment processes at the facility and no water pollution control equipment is required.

The facility will utilize double wall carbon steel tanks for oil and urea storage. Oil and urea distribution piping throughout the site will be installed within a concrete trench for spill containment. While not anticipated,

trenches will be manually drained and properly disposed of in the event of a pipe failure. Any oil or urea manually removed from trench will be disposed of according to all local, state, and federal regulations.

(c) Receipt of National Pollution Discharge Elimination System permit

The existing stormwater basins are currently configured with their permanent outlet structure design. The current construction plans require disturbance of more than one acre of land, a NPDES construction general permit, and NOI will be required. The NPDES permit for construction has not yet been submitted. Once the construction activities have ceased and the facility has been stabilized in accordance with the construction NPDES permit, then the NPDES permit will no longer be required and will be terminated according to the requirements.

(d) Quantitative flow diagram or description of wastes

Sewage:

The generation equipment at the facility is not connected to the sanitary sewer system.

Blow-down:

Blow-down is not anticipated for these operations.

Chemical and Additive Processing:

The facility will not have chemical or additive processing.

Wastewater processing:

The facility will not contain wastewater processing.

Run off from Leachates from Fuels and Solid Wastes:

The facility does not produce leachates or have any run-off from fuel or solid waste. In the unlikely event a spill occurs from diesel or oil, the Spill Prevention, Control and Countermeasures (SPCC) plan will be

implemented, and appropriate actions will be taken immediately to resolve the situation.

Oil Water Separator:

There will not be any oil water separators located at the facility.

Run off from soil and other surfaces:

Run off from soil is not anticipated after construction activities.

(e) Conservation Practices

The generation equipment and systems do not have a municipal water connection. Each engine system utilizes a closed loop glycol-water heat rejection system that will be filled and drained manually as required. A small amount of glycol-water will be required at periodic maintenance intervals. This will be brought in pre-mixed from offsite and equipment will be filled as needed.

(D) Compliance with solid waste regulations

(1) Preconstruction solid waste

(a) Nature and amount of solid waste

The Applicant is not aware of any debris or solid waste deposits within the Project Area that would require removal in support of preconstruction development of the facility.

(b) Plans to deal with waste

No preconstruction solid waste is anticipated.

(2) Construction solid waste

(a) Nature, amount, and composition of solid waste

It is anticipated that a limited amount of debris and other solid waste may be generated during construction. These types of debris or waste may

include plastic, wood, cardboard, concrete, metal and other packaging/packing materials, construction debris, and general refuse.

(b) Storage, treatment, transportation, and disposal of waste

If any such debris or solid waste are generated, it will be secured and removed and disposed of at an appropriate disposal facility. Collection facilities will be located at the Project Area to collect waste from construction activities. It is anticipated that a private contractor will remove the collected debris and solid waste as necessary.

(3) Operation solid waste

(a) Nature, amount, and composition of solid waste

During normal facility operations, the facility may generate small quantities of office refuse. Waste may be generated from regular O&M activities such as used oil, oil filters, universal waste (batteries, lamps), scrap metal, and other general debris.

(b) Storage, treatment, transportation, and disposal of waste

The Applicant will manage, store, and dispose of all waste in accordance with federal, state, and local regulations. The Applicant will utilize appropriate vendors for solid waste management.

(4) Licenses and Permits

Management of waste generated during the construction or operation of the facility will not require a license, registration, or permit. The Applicant will utilize waste disposal contractors that are registered, as required. The Applicant will comply with all waste tracking and reporting requirements, as applicable.

(E) Compliance with environmental and aviation regulations

(1) Height of tallest structures

The tallest anticipated aboveground structure for the facility is the top of the proposed power generation exhaust stacks and they are anticipated to be 65-85 feet in height.

(2) List of airports, heliports, landing strips, medical use heliports, and seaplane sites and map

Airports, heliports, landing strips, medical use heliports, and seaplane landing sites within six nautical miles of the Project Area have been identified and are listed below:

- **Warped Wing Private Airstrip (Federal Aviation Administration [FAA] ID OH56)** is a privately owned, private use turf airstrip located approximately 4.1 nautical miles (4.7 miles) north of the nearest edge of the Project Area.

Figure A in the Aviation Study Exhibit D of this Application, Aviation Study, provides a map that shows the airports, heliports, landing strips, medical use heliports, and seaplane landing sites within six nautical miles of the Project Area or property within or adjacent to the Project Area. The map includes three other air transportation facilities that were identified, but those were beyond the six nautical mile study radius.

(3) Federal Aviation Administration

Given the distance from the airstrips, heliports, and airports and the proposed facility being of a similar height to other existing surrounding structures, the facility is not anticipated to have any impact on navigable airspace. Refer to Figure 7, FAA Notice Criteria Tool, of this Application, for the results for the FAA Notice of Criteria tool indicating the proposed heights do require notification for impacts to signal reception, not navigable airspace. Once the structure heights have been finalized in coordination with Ohio EPA, a filing will be submitted in accordance with CFR Title 14 Part 77.9.

(4) 14 CFR part 77 impacts

The airspace surrounding the Project Area was analyzed and the facility structures are not anticipated to penetrate or create any obstructions to the 14 CFR Part 77 imaginary surfaces. However, due to the proximity of the proposed structure to John Glenn Columbus International Airport, the FAA Notice Criteria Tool states that it may impact the assurance of navigation signal reception, and, in accordance with CFR Title 14 Part 77.9, requested a filing. A notice of construction will be filed with the FAA and construction will not be initiated until receipt of a determination from the FAA. Notice of construction will also be submitted to ODOT Office of Aviation for review prior to initiating construction. All supplemental notices will be filed as required.

(5) Licenses and permits

A notice of construction will be filed with the FAA and construction will not be initiated until receipt of a determination from the FAA. Notice of construction will also be submitted to ODOT Office of Aviation for review prior to initiating construction. All supplemental notices will be filed as required.

(6) Construction debris and disposal

It is anticipated that a limited amount of debris and other solid waste may be generated during construction. These types of debris or waste may include plastic, wood, cardboard, metal and other packaging/packing materials, construction debris and general refuse.

If any such debris or solid waste are generated, they will be secured and removed and disposed of at an appropriate disposal facility. Collection facilities will be located at the Project Area to collect waste from construction activities. It is anticipated that a private contractor will remove the collected debris and solid waste as necessary.

(7) Confirmation of stormwater control and minimization of erosion

The existing stormwater basins are currently configured with their permanent outlet structure design and because more than one acre is expected to be disturbed during construction, NPDES coverage will be applied for and a SWPPP plan will be prepared and followed to ensure erosion is minimized during construction.

(8) Disposition of contaminated soil and hazardous materials

No contaminated soils or hazardous materials were found during geotechnical investigation as outlined in the Geotechnical Report Exhibit E of the Application. In the event contaminated soils or hazardous materials are generated, they will be characterized and disposed of based on federal, state, and local regulations.

(9) Construction and dusty muddy soil conditions

During periods of time when the site may become excessively dusty, dust control mitigation may be warranted and will be implemented according to BMPs. If the site becomes excessively muddy, then conditions will be evaluated to ensure the safety of the onsite workers. Additionally, excessive mud is tracked off site from the site then additional measures may need to be implemented to address any adverse conditions.

4906-4-08 Health and safety, land use, and ecological information

(A) Health and safety

(1) Safety and reliability of equipment

(a) Compliance with applicable state and federal statutes and regulations

Facility access will be limited to authorized personnel to minimize public safety concerns. The construction contractor(s) will be required to define a rigorous safety protocol and engage with onsite personnel throughout the construction of the facility. The Applicant will only utilize contractors that have a demonstrated safety record, as well as commitment to a culture of safety.

The presence of medium voltage electrical equipment at the Facility could present a potential safety risk. All equipment will be installed according to the National Fire Protection Association (NFPA) 70E and/or National Electrical Code (NEC) standards prior to being brought online.

The facility will utilize a high-pressure natural gas line to fuel the associated power generation equipment at the facility. During the construction and operation, the Applicant will comply with all applicable regulations under the U.S. Department of Transportation gas pipeline safety standards as well as the Ohio Gas Pipeline Safety regulations under Ohio Adm.Code 4909:1-16.

(b) Major public safety equipment

To prevent unauthorized entrance to the Project Area, access control measures will be implemented during the construction and operation phases. Signage will be posted around the Project Area during construction warning of the potential dangers within the site. Efforts will be made to prevent unauthorized site access with a combination of perimeter security

fencing, controlled access gates, and site monitoring. Personnel that may be exposed to public vehicular traffic will utilize reflective and high-visibility garments.

(c) Equipment reliability

Equipment reliability is a critical element of the facility. The applicant will only select equipment that is reliable and compatible with the operations. All equipment will follow industry code(s) as applicable including Institute of Electrical and Electronics Engineers (IEEE), American National Standards Institute (ANSI), National Electrical Safety Code (NESC), and NEC. Additionally, equipment will meet any state or local codes as applicable. The equipment will be regularly maintained on a preventative maintenance schedule to ensure continued operation and plant reliability.

(d) Generating equipment safety manuals

Generation equipment manufacturer's safety standards will be kept with the facilities O&M plans. All equipment will be compliant with Underwriters Laboratories (UL), IEEE, NEC, NESC, and ANSI. The Applicant will follow all safety and setback requirements as outlined in the manufacturer's product manuals and specifications.

(e) Measures to restrict public access

The public does not have access to the private facility. Additionally, efforts will be made to prevent unauthorized site access with a combination of perimeter security fencing, controlled access gates, and site monitoring.

(f) Fire protection, safety, and medical emergency plans during construction and operation

All facility employees and contractors will be required to adhere to an Emergency Action Plan (EAP). A preliminary EAP is provided in Exhibit

F of this Application. Additionally, a Health and Safety Plan will be developed with consultation from all necessary local emergency services, including medical facilities. The Applicant will consult with local emergency service personnel (fire, police, medical) to review and discuss the planned construction process. The Applicant will include local emergency service personnel in joint training exercises as necessary. The final EAP will be submitted to OPSB prior to the preconstruction meeting.

The battery energy storage system (BESS) will conform to the NFPA 855 fire protection requirements and include hazardous gas detection and removal systems as well as fire sensors and alarms. The Project will adhere to the International Fire Code 2021 Chapter 12 for BESS-specific guidance and the Ohio Fire Code for general guidance. Further guidance will be obtained from collaborating with the local Fire Chief or Authority Having Jurisdiction (AHJ). The Applicant will coordinate with the local Fire Chief or AHJ to ensure there is sufficient water resources available to properly address any firefighting needs at the facility in accordance with the applicable fire code. The final design of the BESS will also adhere to the latest accepted industry standards, including, but not limited to, NFPA 855 (2023), NFPA 69, 70, 70E, UL 1642, UL 1973, UL 9540, and UL 9540A. These standards establish procedures and certification of fire safety design and testing for battery storage systems. Further, a fire protection engineer will be involved to review and approve the final construction plans for the battery energy storage fire protection system.

(g) Sensitive receptor considerations

All considerations were taken when preparing this Application.

(2) Probable impacts due to failure of air pollution control equipment

Federal and state regulations set the requirements for emission controls. Each unit equipped with emissions control equipment will be monitored as required by

federal and state regulations as well as permit requirements. If failures are noted in the emissions control equipment based on the monitoring equipment data, the units will be shut down safely until the emissions control equipment is repaired. During this time, redundant equipment may be utilized. Possible failures in emissions control equipment could result in temporary higher emissions rates until the equipment can be safely shut down. These events would be expected to be short in duration and therefore have minimal impacts.

(3) Construction and operational sound

(a) Sound from the following sources

Refer to the Noise Study Exhibit G of this Application for nature and associated sound levels from the following sources.

(i) Blasting activities

No blasting is planned.

(ii) Operation of earthmoving equipment

Earth moving equipment is expected to generate the highest sound levels at the southwest property line, with an estimated level of approximately 72 A-weighted decibels (dBA).

(iii) Driving of piles, rock breaking or hammering, and horizontal directional drilling

Impact pile driving is anticipated to contribute the highest non-continuous sound levels compared to other construction activities to the nearest residential property line. Sound levels are expected to reach approximately 80 dBA to the nearest residential property line east of the energy center, and approximately 83 dBA to the southwest property line.

(iv) Erection of structures

Structural erection is expected to produce the highest sound levels at the southwest property line, with an estimated sound level of approximately 75 dBA.

(v) Truck traffic

Truck traffic is projected to generate the highest sound levels at the southwest property line, with an estimated sound level of approximately 68 dBA.

(vi) Installation of equipment

Due to minimal simultaneous operation of equipment during installation, this scenario is expected to produce the lowest noise levels of all construction activities. The highest sound levels are anticipated at the south property line, with an estimated sound level of approximately 64 dBA.

(b) Operational sound levels at the nearest property boundary

Refer to the Noise Study Exhibit G of the Application for nature and associated sound levels from the following sources.

(i) Generation equipment

Noise levels range from 48-68 dBA at the property line. At property lines shared with residential properties, the maximum noise level is 57 dBA. The Noise Study Exhibit G of the Application provides additional details.

(ii) Processing equipment

Noise levels from processing equipment during operations is not included, as it is not expected to significantly contribute to overall

project noise levels. No processing equipment is anticipated for the operation of equipment.

(iii) Associated road traffic

Noise levels from associated road traffic during operations is not included, as it is not expected to significantly contribute to overall project noise levels. Operation of the Facility will require approximately 10-15 employees and impacts are not anticipated.

(c) Location of sound-sensitive areas within 1 mile of the facility

Figure 3 within the Noise Study Exhibit G of the Application describes potential noise levels at a 1-mile radius from the site. Tabulated noise levels at various receiver locations are included in Table 6 within the Noise Study Exhibit G. As noted in the Noise Study Exhibit G, maximum noise levels are expected to be the same during daytime and nighttime, as equipment is expected to operate continuously. It is anticipated the nighttime levels will be less impactful due to cooler temperatures requiring fewer pieces of generation equipment to operate.

(d) Mitigation of sound emissions during construction and operation

Power from the facility will be provided by 28 containerized Jenbacher J624 engines, 4 containerized Jenbacher J620 engines, and 16 Mainspring Linear Generators. Jenbacher and Mainspring generators are housed in sound-attenuating enclosures to reduce emitted noise levels. Jenbacher enclosures are rated for a sound level 75 dBA measured at 33 feet, and Mainspring enclosures are rated for a sound level of 70 dBA measured at 6 feet.

Additionally, a 35 foot and 15 foot tall acoustic louver is included between the power generating equipment and the nearest residences to the south of the Project Area to mitigate noise emissions. Figure 1 within Noise Study Exhibit G provides additional details. Barriers heights were determined to minimize visual impacts and align with a specific noise level at the property line. The exact location and height of these barriers is subject to change as the design specifics are determined.

Project construction will take place between the hours of 7:30 a.m. to 7 p.m. These hours conform to the hours permitted under the City of New Albany, Ohio Code of Ordinances Section 521.12,

(e) Preconstruction background sound study

To determine existing background noise levels on site, baseline sound measurements were taken at specific locations as shown in Figure 4 within the Noise Study Exhibit G. Table 8 below shows the background noise measurement results from the associated analysis. The analysis indicates that nighttime noise levels were higher than daytime levels, primarily due to elevated insect activity. In contrast, daytime noise levels were largely influenced by traffic from nearby roadways, which served as the dominant background noise source.

Table 8: Background Noise Measurement Results

Location	Daytime Leq (dBA) 7am – 7pm	Nighttime Leq (dBA) 7pm – 7am
24 - Hour Measurement	48	52
20 - Minute Measurement A	55	-
20 - Minute Measurement B	63	-

(4) Water impacts

(a) Impacts to public and private water supplies from construction and operation

As explained previously, the existing stormwater basins are currently configured with their permanent outlet structure design and if more than one acre is disturbed during construction, a NOI will be required and the basins will need to be retrofitted for sediment control. No impacts are expected to water supplies.

(b) Impacts to public and private water supplies due to pollution control equipment failure

No impacts are expected. Temporary Sediment and Erosion Control materials will be utilized in accordance with state and local requirements during construction activities. No pollution control equipment will be required for on-going operational activities. No discharges are expected during operations.

(c) Water resource map of areas directly affected

Refer to Figure 8, Water Resources Map, of the Application for a depiction of the aquifers, water wells, and Drinking Water Source Protection Areas (groundwater) located in proximity to the Project site. Per a search of the Ohio EPA's Drinking Water Source Protection Areas Map, there is one surface water Drinking Water Source Protection Areas located within one miles of the Project Area.

(d) Compliance with local water source protection plans

There is one Drinking Water Source Protection Area (groundwater) within one mile of the project area. It is a non-community, groundwater system serving the Shell station located at the southeast corner of Harrison Road and Worthington Road NW, 0.87 mile southwest of the Project Area. The

private groundwater drinking water source protection plan is not available through online resources; it is unlikely that the proposed activities will affect this drinking water source given its distance from the site and the very limited protection area. The Applicant will coordinate with the applicable local authorities to ensure protection of local drinking water sources. The Facility will implement an SPCC plan in the event there are any unintended oil spills.

(e) Analysis of prospects of floods in the area

Exhibit 5 within the Ecological Resources Study, Exhibit A to this Application, provides an analysis of floods in the area. The Project Area is in Zone X and it is over 1.5 miles from a stream with a Federal Emergency Management Administration (FEMA) regulated floodplain.

(5) Geological features map

(a) Geological suitability

The proposed development is located at the site of the existing building, which contains the slab-on-grade structure as well as associated pavements, stormwater basins, and utilities. Topographically, the site has been leveled or slightly sloped to allow for the current development. Prior to development of the existing building, the site was gently rolling with a prevailing northeast to southwest slope. The Applicant estimated the relief at about 10 feet. Based on preliminary foundation loads and plans, it was determined that the structures (i.e., power generators, tanks, etc.) can be supported using conventional shallow foundations or mats bearing on site soils or ground improvement if needed.

The Geotechnical Report found in Exhibit E of the Application did not identify any concerns with the suitability of the site or plans to remedy site-specific inadequacies.

(b) Soil suitability for grading, compaction, and drainage

As shown in Figure 10 – Soil Survey Map of the Application, the site soils are predominated by Condit silt loam (Cn), Bennington silt loam (BeA and BeB), and Pewamo silty clay loam (Pe). The ramification of the presence of these Pewamo and Condit soils, particularly where poorly drained and during wet periods, is that they tend to be soft and wet, and oftentimes require some form of drying to obtain stable subgrades during mass grading. A preliminary Grading Plan is provided in Figure 9 – Preliminary Grading Plan of the Application.

(c) Soil suitability for foundations construction and areas with slopes

As shown in Figure 10 – Soil Survey Map of the Application, the soils located within the facility footprint include Bennington silt loam with 2 to 6 percent slopes (BeB); Centerburg silt loam, 6 to 12 percent slopes, eroded (Cen1C2); and Pewamo silty clay loam (Pe). Within the larger study area, Bennington silt loam, 0 to 2 percent slopes (BeA); Condit silt loam, 0 to 1 percent slopes (Cn); and Shoals silt loam, 0 to 2 percent slopes, occasionally flooded (Sh) are also present. None of these soil types are classified as highly erodible, nor do they exhibit slopes greater than 12 percent.

The generalized soil profile consists of topsoil over lean clay and glacial till with intermittent layers of sand, gravel, and silt. The upper-level lean clay was generally medium stiff. However, portions of the deposit were soft. The glacial tills were generally stiff to very stiff.

The softness and "wetness" of the upper-level lean clay will have an impact of site preparations and foundations. Some of the noted wetness and softness could be seasonal. Issues associated with the soft, wet upper lean clay include subgrade stability and foundation support on the lean clay.

There is a possibility for some of the equipment pads to be more heavily loaded than assumed. In this case a ground improvement system such as

rammed aggregate piers (RAPs) or rigid inclusions can be used to increase bearing capacities and reduce expected settlements.

(d) Plans for test

The boring logs, a summary table of encountered subsurface conditions, and a boring location plan is provided within the Geotechnical Report Exhibit E of the Application. Refer to individual boring logs in the appendix for more detailed subsurface information at specific boring locations.

A third-party contractor, GCI, mobilized a truck-mounted, rotary drill-rig (with automatic sampling hammer) to the site on February 24, 2025, to drill the six (6) standard penetration borings to obtain a generalized profile of existing subsurface conditions. The borings were drilled to a depth of 30 feet to aid in foundation design in areas of prior shallow borings.

Borings were drilled in a landscaped area of the site to avoid damaging pavements or slabs. The contractor measured 0.3 to 0.6 feet of topsoil. Existing fill was encountered in four of the borings. The fill was encountered to depths of 1 to 2 feet and consisted of mixtures of lean clay (CL), sandy CL, and trace amounts of topsoil. It was noted that these borings were drilled in areas where the site was likely cut to existing grades and fill depths are likely deeper on the southwest building line and pavements beyond. Limited standard penetration testing indicated variable soft to stiff consistencies.

<u>Lean Clay Mantile</u>

Below the topsoil of fill in borings B-101, B-102, and B-106, a lean clay mantle was encountered that was classified as brown to brown mottled gray lean clay to lean with sand (classified as CL in the ASTM/Unified Soils Classification System). These soils are typically considered to have a moderate plasticity; however, the Pewamo soils tended to have some higher plasticity veining as noted in the logs.

- Standard penetration tests indicated this layer to be generally medium stiff to stiff in cohesive consistency, with isolated soft zones, typically from high moisture.
- The lean clay mantle is characterized as variably moist to very moist with an isolated wet zone in boring B-101.
- The upper lean clay layer extended to a depth of about 4 feet.

Glacial Till

Below the upper lean clay soils, the borings encountered brown and gray glacial till commonly classified as sandy lean clay to sandy CL with gravel. The soils were noted as low to moderate plasticity.

- The till contained random thin layers of sand and silt.
- Standard penetration tests indicated the till was generally medium stiff to very stiff in cohesive consistency.
- The till was typically characterized as moist, with very moist and wet zones, particularly where seepage was encountered.

Bedrock

Bedrock was not encountered within the 30-foot drilled depths of the borings. Review of the Ohio Department of Natural Resources (ODNR) Shaded Drift-Thickness Map suggested bedrock depths between 200 to 250 feet at this site.

Groundwater:

Groundwater seepage was encountered in four of the borings at depths of 13 to 25 feet. In general, seepage was encountered within sand and gravel seams within the glacial tills. The contractor noted that groundwater levels and moisture conditions can vary with changes in season, stabilization time, and in response to precipitation events.

It is not anticipated that groundwater will pose significant problems with most normal shallow footing or shallow utility excavations. CGI

recommended that, if water is encountered in site excavations, the excavations should be dewatered to allow footing construction and utility trench backfilling in dry conditions. The contractor notes that use of working mats of crushed stone and portable sump pumps should be sufficient to allow construction in dry conditions for footings and shallow utilities.

Laboratory Testing

The third-party contractor, GCI, implemented a limited laboratory soil testing program. This testing consisted of:

- Index Testing (Atterberg Limits and gradation analysis); four 4 bulk samples at various borings at depths of 1 to 5 feet
- Testing for Standard Proctor (moisture/density) for thermal resistivity testing; 4 bulk samples

GCI performed index testing on 4 bulk samples; index testing included Atterberg Limit tests, moisture content and gradation analysis on each sample. The results of this testing are summarized below:

Table 9: Index Testing Summary

Summary of Atterberg Limits and Gradation Testing

Boring	Depth (feet)	Water Content (%)	Liquid Limit	Plastic Limit	Plasticity Index	%Fines (<#200 Sieve)	ASTM/USCS
B-101	1 to 5	21.8	28	17	11	76.7	Lean Clay with Sand (CL)
B-102	1 to 5	18.3	35	19	16	65.6	Sandy Lean Clay (CL)
B-103	1 to 5	16.7	31	16	15	65.5	Sandy Lean Clay (CL)
B-105	1 to 5	15.2	31	16	15	68.8	Sandy Lean Clay (CL)

Standard Proctor testing was performed on bulk samples. These results were needed for use in thermal resistivity testing. The results can be used during construction to evaluate the degree of compaction being achieved by the contractor. Refer to the appendix of the Geotechnical Report Exhibit E - of the Application for the test results. The results of this testing are summarized below:

Table 10: Proctor Testing Summary

Summary of Standard Proctor Testing

Sample ID	Depth (feet)	Water Content (%)	Dry Density, pcf	Optimum Moisture (%)	ASTM/USCS
B-101	1 to 5	21.8	113.8	15.9	Lean Clay with Sand (CL)
B-102	1 to 5	18.3	114.1	14.8	Sandy Lean Clay (CL)
B-103	1 to 5	16.7	119.0	13.0	Sandy Lean Clay (CL)
B-105	1 to 5	15.2	117.3	13.6	Sandy Lean Clay (CL)

(6) Prospects of high winds for the area

Per ASCE/SEI 7-16, the basic wind speed is a nominal design 3-second gust wind speed that is derived at a height that is 33 feet above grade for Wind Exposure Category "C". This wind speed has a mean reoccurrence interval (MRI) of 700 years, which gives it an annual exceedance probability of 0.00143. For a 50-year life cycle of the building, the probability of exceedance is 7%.

The design of buildings and other structures will conform to the requirements of the 2024 Ohio Building Code, which require that the provisions of ASCE/SEI 7-16 be observed. To mitigate any adverse consequences, the structural engineer will:

- Ensure that each building/structure on the Project site has a suitable lateral load resisting system.
- Design, or provide performance requirements to enable the design of, each building/structure for applicable design-level wind loads.
- Evaluate the effects of design-level wind loads on the roof of each building/structure. Where a net uplift force occurs, design, or provide performance requirements to enable the design of, roof structural members capable of resisting net uplift forces.
- Design, or provide performance requirements to enable the design of, secondary structure to resist design-level wind loads and distribute the applied wind loads to the building lateral load resisting system.
- Design, or provide performance requirements to enable the design of, foundations to resist design-level wind loads and the overturning effects that result from wind loads being exerted on the building/structure.
- Design, or provide performance requirements to enable the design of, hold-downs for equipment mounted to the roof of each building/structure or to

equipment mounted to concrete foundation pads. The hold-downs must be capable of resisting tension and shear forces resulting from wind loads exerted on the equipment.

(7) Blade sheer

This section is not applicable to the facility.

(8) Ice throw

This section is not applicable to the facility.

(9) Shadow flicker

This section is not applicable to the facility.

(10) Radio and television reception

Radio Reception: Comsearch conducted an AM and FM Study that is provided as AM/FM Study Exhibit H of this Application.

As there were no stations found within 1.86 miles of the Project, which is the maximum possible exclusion distance based on a directional AM antenna broadcasting at 1000 kilohertz (KHz) or less, the Project should not impact the coverage of local AM stations. The coverage of FM stations is generally not sensitive to interference due to large metallic structures and generators, especially when they are located in the far field region of the radiating antenna to avoid the risk of distorting its radiation pattern. The nearest FM station, Station WNKO, to the project is 5.78 miles away. At this distance there is adequate separation to avoid radiation pattern distortion. Since no impact on the licensed and operational AM or FM broadcast stations was identified, no recommendations or mitigation techniques are required for this project. Refer to AM/FM Study Exhibit H of the Application for additional details.

Television Reception: Comsearch conducted a television reception study that is included as the Television Study Exhibit I of this Application. Both cable service and direct broadcast satellite service will be unaffected by the presence of the power facility. Refer to the Television Study Exhibit I – of the Application for additional details.

The coverage of television stations is generally not sensitive to interference due to large metallic structures and generators. In addition, power facilities typically do not cause electromagnetic interference (EMI) to over-the-air (OTA) television reception. Title 47 Part 15B of the Federal Communications Commission (FCC) rules and regulations provide guidelines for unintentional radiators such as power generators such that their EMI emissions are controlled to within certain limits and thereby limiting the potential impact on other devices including television receivers.

(11) Military and civilian radar systems

Comsearch conducted a radar study, provided in the Radar Systems Study Exhibit J of this Application. Based on the analysis referenced in the Radar System Study Exhibit J, none of the 13 Doppler radar systems and 4 NEXRAD radar systems in the vicinity of the PCX I Project, which was established at 155 miles from the Project Area, could be impacted by the Project. Given that no impact was identified, no measures are needed to minimize interference.

To determine the potential impact of the facility on the radar systems in the area, calculations were done to confirm whether the facility is in line-of-sight (LOS) of the radar systems. Considering the LOS locations in the Project, the height of the generators, the distance and centerline of the radars, the generator structures with regard to call sign WQGK748 would fall below a 0.12° elevation angle. Since this angle falls well below the lowest radar elevation angle of 0.50°, the project will not be visible to the commercial Doppler and NEXRAD radars and, therefore, they will not be impacted.

(12) Navigable airspace interference

Kimley-Horn conducted an Aviation Study, included as the Aviation Study Exhibit D to this Application. Given the distance from these airstrips, heliports, and airports and the proposed facility being of a similar height to other existing surrounding

structures, the facility is not anticipated to have any impact on navigable airspace. Refer to the Aviation Study Exhibit D for additional information.

(13) Microwave communication paths and systems

Comsearch prepared a Microwave Study, included as Microwave Study Exhibit K of the Application. Microwave bands that may be affected by the installation of energy facilities operate over a wide frequency range [900 megahertz (MHz) – 23 gigahertz (GHz)]. To determine if the proposed facility interferes with microwave communications paths, obstruction analysis was performed using a third-party proprietary microwave database that contains all non-government licensed, proposed and applied paths from 0.9 - 23 GHz. The first step of the analysis determined all microwave paths that intersect the area of interest. The area of interest is defined as one mile from the Project Area which encompasses the proposed facility. Based on this analysis, no microwave paths that intersect the Project Area were identified and, therefore, there are no potential obstructions at this time. Refer to Microwave Study Exhibit K of the Application for additional details.

(14) Electric and magnetic fields

The proposed facility will not require any electric transmission lines and no impacts to electric or magnetic fields are anticipated.

(B) Ecological resources

(1) Ecological information in the Project Area

(a) Map

(i) Proposed facility and limits of disturbance

Refer to Figure 9, Preliminary Grading Plan of the Application for limits of disturbance associated with the Facility.

(ii) Undeveloped or abandoned land such as wood lots, wetlands, or vacant fields

Refer to Figure 11, Ecological Resources Map for location of undeveloped forested areas within 1,000 feet of the facilities.

(iii) Wildlife areas, nature preserves, and conservation areas

There are no wildlife areas, nature preserves and/or other conservation areas located within 1,000 feet of the proposed facilities. Refer to Figure 11, Ecological Resource Map of the Application for areas within 1,000 feet of the Facility.

(iv) Surface bodies of water, including wetlands, ditches, streams, lakes, reservoirs, and ponds

Refer to Figure 11, Ecological Resources Map of the Application. There are no water resources located within the footprint of the power generation facility. There is one stream, three stormwater ponds, and one farm pond located within 1,000 feet of the facility. There are no wetlands present; all wetlands previously identified within 1,000 feet of the facility have been previously permitted for impact.

(v) Highly-erodible soils and slopes of 12% or greater

As shown in Figure 10, Soil Survey Map, of the Application the soils located within the facility footprint include Bennington silt loam with 2 to 6 percent slopes (BeB); Centerburg silt loam, 6 to 12 percent slopes, eroded (Cen1C2); and Pewamo silty clay loam (Pe). Within the larger study area, Bennington silt loam, 0 to 2 percent slopes (BeA); Condit silt loam, 0 to 1 percent slopes (Cn); and Shoals silt loam, 0 to 2 percent slopes, occasionally flooded (Sh) are also present. None of these soil types are classified as highly erodible, nor do they exhibit slopes greater than 12 percent.

(vi) Areas of proposed vegetative screening

As shown in Figure 12, Vegetative Communities Map, of the Application, clearing will be limited to maintained grass and landscape trees. No clearing of naturally occurring woody or herbaceous vegetation is proposed.

(vii) Woody and herbaceous vegetation land

As shown in Figure 11, Ecological Resources Map of the Application, non-maintained, naturally occurring vegetation within 1,000 feet of the facility is limited to the ±6.6 acres of forest located southeast of the proposed facility. This forest will not be cleared or otherwise impacted by the proposed project.

(viii) Sensitive habitat areas

As shown in Figure 11, Ecological Resources Map of the Application, there are no sensitive habitat areas onsite that will be potentially impacted by the project. The USFWS and ODNR identified certain bat and migratory bird species as being of concern if suitable habitat is located onsite and will be impacted by the project. The only suitable habitat area onsite is the forested riparian corridor located along the southern site boundary. This habitat will not be impacted.

(b) Field survey and map of vegetative communities and surface water within 100 feet of construction

As shown in Figure 12, Vegetative Communities Map of the Application, no clearing of naturally occurring woody or herbaceous vegetation is proposed on the site.

As shown outlined in the Water Quality Study Exhibit C of the Application, there are no surface water source protection areas within 100 feet of the

facility. Refer to Figure 8, Water Resource Map of the Application, for locations of water resources within 1 mile of the site.

(c) Impacts of construction on vegetation and surface waters

As shown in Figure 11, Ecological Resources Map and Figure 12, Vegetative Communities Map of the Application, impacts to vegetative communities and surface waters are not expected from construction activities.

(d) Literature review of plant and animal life within 0.25 miles of construction

As described in Section 4.1 of the Ecological Resources Study, Exhibit A of the Application, there are no records of state or federally listed plants within one mile of the Project area as per a review of the Natural Heritage Database (NHD) dated April 3, 2025.

(e) Results of field surveys for plant and animal species identified in literature review

Plant Species:

According to Section 4.1 within the Ecological Resources Study, Exhibit A of the Application, there are no records of state or federally listed plants within one mile of the project area as per a review of the NHD dated June 22, 2015.

However, according to Section 4.2 within the Ecological Resources Study Exhibit A of the Application, Amur honeysuckle (*Lonicera maackii*) and Multiflora rose (*Rosa multiflora*) are invasive species that were observed on the Project site. These are typically common along wooded fringe areas and poorly maintained areas in Licking County.

It is important to note that the City of New Albany and Licking County have no ordinances or regulatory requirements for the protection of trees.

Animal Species:

According to Section 5.2 within the Ecological Resources Study, Exhibit A of the Application, the following federally listed animal species may occur in the vicinity of the Project site:

- Indiana bat (*Myotis sodalis*) – Endangered
- Northern long-eared bat (*Myotis septentrionalis*) – Endangered
- Monarch butterfly (*Danaus plexippus*) – Proposed Threatened

The following birds of concern may be located in the vicinity of the Project:

- Bald eagle (*Haliaeetus leucocephalus*)
- Cerulean warbler (*Setophaga cerulea*)
- Chimney swift (*Chaetura pelagica*)
- Lesser yellowlegs (*Tringa flavipes*)
- Pectoral sandpiper (*Calidris melanotos*)
- Red-headed woodpecker (*Melanerpes erythrocephalus*)
- Wood thrush (*Hylocichla mustelina*)

Due to the location and type of habitat within the Project Area, the bald eagle, cerulean warbler, chimney swift, lesser yellowlegs, and pectoral sandpiper are not expected to be encountered. However, the woodlot within the southern portion of the Project Area offers marginally suitable habitat for the red-headed woodpecker and the wood thrush, both of which are tree nesting species.

To avoid incidental take, any tree clearing will be conducted outside the breeding and nesting season, which is April 1 to July 15.

Threatened Species:

As stated in the Ecological Resources Study, Exhibit A of the Application, the following federally listed animal species may occur in the vicinity of the Project site:

- Indiana bat (*Myotis sodalis*) – Endangered
- Northern long-eared bat (*Myotis septentrionalis*) – Endangered
- Monarch butterfly (*Danaus plexippus*) – Proposed Threatened

The study found that based on a review of the NHD, dated April 3, 2025, there are no records of state or federally listed animals within one mile of the Project Area. Refer to Appendix A of the Ecological Resources Study, Exhibit A of this Application, for ODNR's review letter.

The habitat for the listed bat species consists of suitable trees in riparian corridors including: (1) dead and dying trees with exfoliating bark, crevices or cavities; and (2) living trees with exfoliating bark, cavities or hollow areas formed from broken branches or tops. Most of the trees within the Project site are medium-aged, living trees that lack significant exfoliating bark, cracks, or crevices. No bats were observed on the Project Area during the site visit.

Per Appendix A of the Ecological Resources Study, Exhibit A of this Application, coordination conducted with the USFWS and ODNR, seasonal tree cutting (clearing of trees ≥3 inches diameter at breast height between October 1 and March 31) is recommended and sufficient to avoid impacts to listed bat species. Generally, no bats were observed on the subject property during the site visit.

(f) Additional ecological impact studies

Invasive Species:

According to Section 5.3 Invasive Species within the Ecological Resources Study, Exhibit A of this Application, no invasive insects were reported or observed at the site. It is also noted that no invasive aquatic species are located within the portion of the site occupied by the facility.

(2) Potential ecological resource impacts during construction

(a) Impact of construction on resources surveyed

No streams will be crossed or are located within the footprint of the facility. As shown in Figure 13, Delineation Map of the Application, Stream 5 will not be impacted by the power generation facility.

As shown in Figure 13, Delineation Map of the Application, all wetlands previously located onsite were permitted and impacted by the prior site development. These wetlands were permitted (Ohio EPA ID No. 217323W) and were disturbed during the construction of the existing building. Therefore wetlands are no longer present on the site.

The Project will be developed within maintained open space (turf grass).

The Ecological Resources Study, Exhibit A of the Application, concluded there would be no impacts from construction, as the Project will be developed within maintained open space (turf grass) and any tree clearing required will be limited to landscape trees. As previously noted, the City of New Albany and Licking County have no ordinances or regulatory requirements for the protection of trees.

Per the Ecological Resources Study, Exhibit A of the Application, impacts to ecological resources such as surface water resources, vegetation, and animal plant resources will be minimal or will be avoided.

(b) Mitigation procedures to minimize short- and long-term construction impacts

(i) Post-construction restoration of disturbed soils

There are no riparian areas or wetlands within the Project Area. Areas that are disturbed as part of construction activities will be returned to previous conditions including reseeding.

(ii) Frac out contingency plan for stream and wetland crossings

This section does not apply. Horizontal directional drilling is not anticipated for this Project.

(iii) Methods to demarcate surface waters and wetlands

This section is not applicable because there are no surface waters or wetlands within the Project Area. Refer to Figure 13, Delineation Map of the Application, for wetlands that were already impacted as part of the previous development.

(iv) Inspection and repair of erosion control measures

Earth disturbance greater than one acre, requires a NPDES permit. All inspection and repair of erosion control measures will be outlined in the SWPPP that will be prepared prior to initiating construction at the site.

(v) Methods to protect vegetation

This section is not applicable, because there are no mature trees or wetlands located within the Project Area. The City of New Albany and Licking County have no ordinances or regulatory requirements for the protection of trees.

(vi) Options for disposal of trees, brush, and other vegetation

This section is not applicable, because any clearing will be limited to a minimal number of small, recently installed landscaping trees.

(vii) Avoidance measures for major species and their habitat

Birds:

To avoid incidental take, any tree clearing will be conducted outside the breeding and nesting season, which is April 1 to July 15.

Bats:

Seasonal tree cutting (clearing of trees ≥3 inches diameter at breast height between October 1 and March 31) will be followed in order to avoid impacts to listed bat species.

(viii) Measures to divert stormwater runoff

A SWPPP will be implemented to minimize erosion and sedimentation from storm water runoff. Various BMP's such as silt fences or erosion control blankets will be utilized to minimize impacts from construction related activities. These strategies will be inspected to validate proper installation and ensure continued effectiveness.

(ix) Herbicides use for maintenance

No herbicides are expected to be used for maintenance beyond typical lawn care protocols.

(3) Potential impacts to ecological resources during operations and maintenance

(a) Evaluation of impact of operations and maintenance on undeveloped areas, plants and animals

This facility has already been developed with an existing building as shown in Figure 11, Ecological Resources Map of the Application. Noise from the proposed facility may cause temporary impacts to wildlife in the nearby, limited forested areas. Noise may potentially cause birds, bats, squirrels, and other wildlife to move away from the Project Area, but it is expected that this will not have a long-term impact as these wildlife species are highly mobile and can recolonize to suitable habitat located elsewhere. As such, it is unlikely that construction noise would result in any direct, adverse effects to wildlife.

(b) Procedures to avoid/minimize/mitigate short- and long-term O&M impacts

(i) Procedures to be utilized to avoid, minimize, and mitigate both the short- and long-term impacts of O&M

This facility has been developed adjacent to an existing building.

Refer to Figure 11, Ecological Resources Map of the Application.

(ii) Methods for protecting streams, wetlands, and vegetation, particularly mature trees, wetland vegetation, and woody vegetation in riparian areas

This facility has been developed adjacent to an existing building.

Refer to Figure 11, Ecological Resources Map of the Application.

(iii) Description of any expected use of herbicides for maintenance

No herbicides are expected to be used for maintenance beyond typical lawn care protocols.

(c) Post-construction monitoring of wildlife impacts

The site has been previously developed; therefore, no post construction monitoring of wildlife impacts is anticipated to be necessary.

(4) Mitigation procedures for vegetation, surface water, and species

To avoid incidental take of birds, any tree clearing will be conducted outside the breeding and nesting season, which is April 1 to July 15. Seasonal tree cutting (clearing of trees ≥3 inches diameter at breast height between October 1 and March 31) will be followed in order to avoid impacts to listed bat species.

(5) Propagation of noxious weeds

To control noxious weeds and invasive species during pollinator-friendly plantings, the Applicant will conduct regular surveys for early detection and use clean

equipment and certified seeds to prevent their spread. The Applicant will implement mechanical, chemical, and biological control methods to manage weed populations effectively. In addition, the Applicant will replant native species and maintain soil health to prevent re-infestation. Further, the Applicant will ensure compliance with public orders and educate operations staff and the community on weed management practices.

(C) Land use and community development

(1) Regional land uses and potential impacts of the facility

The site land use consists of industrial development, developed space, maintained space, and open water (stormwater basins), as depicted on Figure 11, Ecological Resources Map of the Application. The majority of the site has been consistently maintained/mowed which provides little opportunity for wildlife habitat. The developed areas include a building/warehouse, paved roadways, parking lots, stormwater basins, and mowed areas that are generally not conducive to wildlife.

The proposed facility is consistent with the planning resources. Parcels within the Project Area are zoned primarily for GE with a small portion of IPUD as indicated on the City of New Albany zoning plan (See 23-0216-Official-Zoning-Map.pdf). These residential properties are currently zoned as agricultural but are intended to be developed into retail per the New Albany 2020 Strategic Plan (See 220823-Engage-New-Albany-Strategic-Plan-Updated.pdf).

Exhibit 10 of the Ecological Resources Study, Exhibit A of the Application, identifies the structures located within 250 feet and 1,000 feet of the proposed generation equipment and associated facilities. The identified structures are listed in Table 2 of the Ecological Resources Study, Exhibit A of the Application. A total of 23 structures are located within 1,000 feet, consisting of dwellings/houses, sheds, and garages. There are no structures located within 250 feet.

(a) Land use map

Refer to Figure 14, Land Use Map of the Application, for drawing including Project Area, proposed equipment locations, land use, structures, and road names within 1 mile of the facility.

(b) Structures table

For the types of structures identified on the map in paragraph (C)(1)(a) of this rule, a table showing the following:

(i) Within 1,500 feet of generation equipment
(ii) Within 250 feet of collection line, access road, substation, or other associated facility component
(iii) Land lease status
(iv) Mitigation measures

Refer to Table 11 below for Existing Structures within 1,500 feet of the proposed generation equipment. Refer to Figure 14, Land Use Map of the Application for structures within 1 mile of the generation equipment.

Construction activities will occur during the hours allowed by the City of New Albany Code or Ordinances to minimize noise impacts to adjacent properties. The facility design will incorporate sound attenuating measures to limit noise impacts during operation and maintenance. A visual and acoustic screen wall is proposed along a portion of the south property line to mitigate sound impacts to the current agricultural zoning planned for future retail use. Air emissions from the facility during operation are designed in compliance with Ohio EPA requirements.

Table 11: Existing Structures

Parcel Number	Number of Structures	Type of Structure	Lease Status
093-107490-03.002	2	Dwelling, garage	Not available
093-107490-03.001	2	Dwelling, shed	Not available
093-107478-00.002	1	Dwelling	Not available
035-106518-00.000	15	Dwelling (7), shed or garage (8)	Not available
035-107490-01.004	*3*	*Dwelling, garage, shed*	*Not available*
095-112236-00.000	1	Dwelling	Not available
093-106422-00.002	1	Industrial	Not available
093-107478-00.001	1	Industrial	Not available
093-107490-00.001	1	Industrial	Not available
095-112074-00.000	2	Industrial	Not available
095-112056-00.006	2	Commercial	Not available

Note: None of the existing structures are leased or owned by the Applicant.

(c) Impact of facility on land uses

The facility is located on an existing industrial site. Given the predominantly built landscape of the surrounding area and the existing development on the Project site, the overall visual impact of the proposed power generation facility is minimal.

The land use of the Project Area consists of industrial development, developed space, maintained space, and open water (stormwater basins), as depicted on Exhibit 8 of the Ecological Resources Study, Exhibit A of the Application. The majority of the Project Area has been consistently maintained/mowed, which provides little opportunity for wildlife habitat.

The Project Area includes a building/warehouse, paved roadways, parking lots, stormwater basins, and mowed areas that are generally not conducive to wildlife.

(d) Structures that will be removed or relocated

No structures will be removed or relocated as part of the Project.

(2) Wind farm maps

This section is not applicable to the facility.

(3) Wind turbine setbacks

This section is not applicable to the facility.

(4) Plans for land use

(a) Formally adopted plans for future use of Project Area and surrounding lands

Parcels within the Project Area are zoned primarily for GE with a small portion of IPUD as indicated on the City of New Albany zoning plan (See 23-0216-Official-Zoning-Map.pdf). These residential properties are currently zoned as agricultural but are intended to be developed into retail per the New Albany 2020 Strategic Plan (See 220823-Engage-New-Albany-Strategic-Plan-Updated.pdf). The facility is compatible with current zones and regional plans.

(b) Applicant's plans for concurrent or secondary uses

The Applicant has no plans for concurrent or secondary uses.

(c) Impact on regional development

The proposed Project will have a positive impact on regional development due to investments in local economy. There are not any anticipated adverse impacts to housing. Construction and operation of the facility will generate employment opportunities.

(d) Compatibility with current regional plans

Parcels within the Project Area are zoned primarily for GE with a small portion of IPUD as indicated on the City of New Albany zoning plan (See 23-0216-Official-Zoning-Map.pdf). These residential properties are currently zoned as agricultural but are intended to be developed into retail per the New Albany 2020 Strategic Plan (See 220823-Engage-New-Albany-Strategic-Plan-Updated.pdf). The facility is compatible with current zones and regional plans.

(e) Current and projected population estimates and projections

Based on data from the U.S. Census, Licking county has an estimated population of 184,898 as of July 1, 2024. For reference: https://www.census.gov/quickfacts/fact/map/lickingcountyohio/PST045224. According to the Ohio Department of Development, by 2050 Licking County population will have grown to 210,522. By 2035, the population may be estimated at 195,148.

(D) Cultural and archaeological resources

(1) Map of landmarks of cultural significance and recreational areas

Figure 16, Recreation Resources Map of the Application, identifies the recreation areas and registered landmarks located within 5 miles of the site. The identified recreational resources are listed in Table 3 of the Cultural Resources Study, Exhibit L of the Application. There are no recreational trails, scenic rivers, routes or byways within 5 miles of the Project Area.

(2) Studies used to determine location of cultural resources

A desktop review was completed, including a review of publicly available historic atlases and topographic maps and information archived at the Ohio State Historic Preservation Office (SHPO) including Ohio Genealogical Society Cemeteries, Ohio Historic Inventory (OHI) forms, Ohio Archaeological Inventory forms,

Census Determination of Eligibility (DOE) files, National Register of Historic Places (NRHP) files, National Historic Landmarks files and previously completed Cultural Resources Surveys. Refer to the Cultural Resources Study, Exhibit L of the Application, for archived maps noted.

(3) Description of impact on landmarks and plans to avoid or mitigate

Based on the desktop review described in the Cultural Resources Study, Exhibit L of the Application, there are no previously recorded cultural resources documented within the proposed Project Area. Review of the records found at SHPO identified two previous surveys which incorporate portions of the current Project Area. One prehistoric archaeological site ineligible for inclusion in the NRHP was identified in close-proximity to but outside of the proposed Project Area during one of the previous surveys. However, the proposed Project will be confined to existing pavement and, therefore, does not have the potential to affect subsurface archaeological deposits.

Twenty-one cemeteries, 176 OHI properties, 6 DOE properties, and 5 NRHP properties are recorded within 5 miles but outside of the proposed Project Area. A viewshed analysis of the proposed Project Area indicated that 3 previously recorded OHI properties within the study area may have potential visibility to the proposed Project. One of these properties (LIC0119913) has been previously determined not eligible for inclusion in the NRHP. The remaining 2 OHI properties (LIC0120013 and LIC0120113) have been demolished. No other above ground resources have potential visibility to the proposed Project.

Based on the size, scope, and location, the proposed Project as planned will have no direct or indirect effect on any previously identified or unidentified cultural resources.

(4) Recreation and scenic areas

(a) Description of the recreation and scenic areas

Figure 16, Recreational Resources Map of the Application, identifies the recreation areas and registered landmarks located within 5 miles of the site. The identified recreational resources are listed in Table 3 of the Ecological Resources Study found in Exhibit A of this Application. There are no recreational trails, scenic rivers, routes or byways within 5 miles of the site. Refer to the Cultural Resources Study, Exhibit L of this Application, for details.

(b) Evaluation of the impact of the proposed facility on those identified recreational and scenic areas and describe plans to mitigate any adverse impact

No adverse impact to recreational and scenic areas are anticipated since there are no recreational trails, scenic rivers, routes or byways within 5 miles of the Project Area.

(5) Description of impact to recreational areas and plans to mitigate

As described previously, based on the size, scope, and location, the proposed Project as planned will have no direct or indirect effect on any previously identified or unidentified cultural resources. Refer to the Ecological Resources Study, Exhibit A of the Application, for details.

(6) Visual Impacts

(a) Visibility, viewshed analysis, and map

Figure 17, Viewshed Map of the Application provides a viewshed analysis within 2 miles of the Project Area. Figure 18, Viewshed Sightlines of the Application, provides a series of visual simulations showing existing and proposed conditions. Given the predominantly built landscape of the

surrounding area and the existing development on the Project site, the overall visual impact of the proposed facility is minimal.

(b) Scenic quality of existing landscape

There are no significant areas of potential visibility beyond two 2 miles from the facility, and there are no recreational/scenic resources, major waterways or landmarks within 2 miles. There are residential structures located adjacent to the southeast property line of the facility that have visibility. However, these residences have all been purchased for planned commercial/industrial development as shown in City of New Albany's strategic plan for retail space. Elements of the facility that are taller than the existing building are proposed with aesthetic enclosures to minimize visual impacts. Given the predominantly built landscape of the surrounding area and the existing development on the Project site, the overall visual impact of the proposed facility is minimal.

(c) Description of existing landscape and evaluate scenic quality

The existing landscape to the north, south, and west of the Project is comprised predominantly of commercial/industrial development. The site is located within the City of New Albany's 'Beech Road North District' and is zoned as IPUD and GE. This area is planned for continued commercial/industrial development. The landscape to the east is comprised predominantly of rural residential and agricultural land uses. However, as stated previously, this land has been recently purchased for future development. Given the predominantly built landscape of the surrounding area and the existing development on the Project site, the overall visual impact of the proposed facility is minimal.

(d) Landscape alterations and impact to scenic quality

As the proposed facility is located on an existing industrial site within the GE Zoning District, the overall visual impact of the proposed facility is minimal. There will be no visual impacts on any scenic or community resources, nor cultural or archaeological resources. Refer to Figure 18, Viewshed Sightlines of the Application for vantage points from the southwest, south, northeast, and northwest of the site. The majority of generation equipment is located behind the existing building that will house data center. The large generation equipment (containerized engines) were intentionally located behind the existing building to reduce visual impacts from Innovation Campus Way. The containerized engines will be provided with an Oyster Grey enclosure to align with the existing color of the existing building. Containerized engines will have their exhaust routed to a common location before rising vertically in a structure and terminating at a point to comply with Ohio EPA requirements. Each vertical structure is proposed with an enclosed ventilated metal panel to reduce visual impacts from public vantage points. The linear generators are located on the southwest side of the existing building because they are shorter in height (9.5 feet tall) and are more easily shielded from public view. A visual wall is proposed along the south side of the property to shield view of engine containers from residential properties to the south of the facility.

(e) Visual impacts within 10 miles

As described in the Ecological Resources Study, Exhibit A of this Application, there will be no visual impacts on cultural and archaeological resources.

(f) Photographic simulations/pictorial sketches

Given the predominantly built landscape of the surrounding area and the existing development on the Project site, the overall visual impact of the proposed facility is minimal. There will be no visual impacts on any scenic or community resources, nor cultural or archaeological resources. Accordingly, renderings were provided from points surrounding the facility, including vantage points southwest, south, northeast, and northwest as shown in Figure 18, Viewshed Sightlines of the Application.

(g) Visual impact mitigation measures

The Applicant has taken great efforts to ensure that the Project is sited in a reasonable manner so as to minimize to the greatest extent possible all potential visual impacts. The majority of generation equipment is located behind the existing building that will house data center. The large generation equipment (containerized engines) were intentionally located behind the existing building to reduce visual impacts from Innovation Campus Way. The containerized engines will be provided with an Oyster Grey enclosure to align with the existing color of the existing building. Containerized engines will have their exhaust routed to a common location before rising vertically in a structure and terminating at a point to comply with Ohio EPA requirements. Each vertical structure is proposed with an enclosed ventilated metal panel to reduce visual impacts from public vantage points. The linear generators are located on the southwest side of the existing building because they are shorter in height (9.5 feet tall) and are more easily shielded from public view. A visual wall is proposed along the south side of the property to shield view of engine containers from residential properties to the south of the facility.

(E) Agricultural districts and potential impacts to agricultural land

(1) Agricultural district map

The proposed facility does not contain any agricultural zoning within the Project boundaries. Refer to Figure 14, Land Use Map of the Application, for land use of surrounding areas.

(2) Impact on agricultural land, uses, and districts

(a) Acreage impacted

The facility is not expected to impact existing agricultural lands.

(b) Impact of construction and operation and maintenance on land, agricultural facilities, and practices

(i) Field operations

The facility is not expected to impact agricultural operations. There are no agricultural operations, soils, irrigation systems or drain tiles on the facility.

(ii) Irrigation

The facility is not expected to impact agricultural irrigation systems. There are no agricultural operations, soils, irrigation systems or drain tiles on the facility.

(iii) Field drainage systems

The facility is not expected to impact agricultural drain tile systems. There are no agricultural operations, soils, irrigation systems or drain tiles on the facility.

(iv) Soils

The facility is not expected to impact existing agricultural soils. There are no agricultural operations, soils, irrigation systems or drain tiles on the facility.

(v) Structures used for agricultural operations

The facility does not have any existing agricultural structures on site.

(vi) Viability as agricultural district land

The facility will not be located on agricultural land or within agricultural district land.

(c) Measures to mitigate during construction and operation and maintenance impacts to agricultural land, structures, and practices

The construction, operation, and maintenance of the facility are not expected to have impacts on agricultural land, structures, or practices. The facility will not be located on agricultural land or within agricultural district land.

(3) Drain tile considerations

The construction and operation of the facility is not expected to have impacts on agricultural drain tile systems. There are no drain tiles in the Project Area.