

**ATTACHMENT D:
DECOMMISSIONING SUMMARY**

1.0 Decommissioning Activities

Decommissioning of the BESS facility will include removing battery enclosures, steel foundation posts, inverters, transformers, equipment pads and foundations, a substation, an O&M facility, and ancillary equipment. The civil facilities, access roads, security fence, and drainage structures and sedimentation basins are included in the scope. Standard decommissioning practices will be utilized, including dismantling and repurposing, salvaging/recycling, or disposing of the site improvements.

During decommissioning, the landowners will be consulted to identify the extent and type of work to be completed. Some Facility infrastructure, such as the access roads, may be left in place at the landowners' request.

Decommissioning will include the removal and transportation of all project components from the Facility site. All dismantling, removal, recycling, and disposal of materials generated during decommissioning will comply with rules, regulations, and prevailing Federal, State, and local laws at the time decommissioning is initiated and will use approved local or regional disposal or recycling sites as available. Recyclable materials will be recycled to the furthest extent practicable. Non-recyclable materials will be disposed of in accordance with State and Federal law.

1.1 Decommissioning of Project Components

Prior to commencing decommissioning of the BESS, all personnel on-site during the decommissioning process will receive a site-specific safety briefing and will be made aware of all electrical shock and arc flash risks when working within the battery enclosures. Hazmat training will also be conducted for all personnel handling lithium-ion batteries during the process.

1.1.1 BESS Components

The BESS Facility will be fully discharged to the minimum state of charge required for removal and safe transportation as per battery manufacturer specifications. It is assumed the battery modules will not be kept in their enclosures for decommissioning activities. The battery modules will be removed from their racks, repackaged on site, and picked up and hauled to a regional recycling hub by a battery recycling supplier. Hauling of batteries is included in the recycling costs.

The refrigerant/coolant from HVAC units will be collected into separate enclosures on site as per the code and industry standard practice. The coolant can be reused after processing. The HVAC units will be sent to the metal recyclers along with other recycling material. All electrical equipment, including the inverters, which are stored in the enclosures, will be disconnected and disassembled. All parts will be removed from the site and reconditioned and reused, sold as scrap, recycled, or disposed of appropriately, at the Project Owner's sole discretion, consistent with applicable regulations and industry standards.

Finally, aggregate ground cover will be removed and shipped from the Project site to be reused, sold, or disposed of appropriately, at the Project Owner's sole discretion, consistent with applicable regulations and industry standards. Clean aggregate can often be used as "daily cover" at landfills for no disposal cost. All internal service roads are constructed with geotextile fabric and eight inches of aggregate over compacted subgrade. All pile foundations will be pulled out completely. Underground cables and duct banks will be removed to a depth of four feet. Topsoil removed during decommissioning will be stockpiled, then reapplied to the disturbed area during restoration efforts. Soil and topsoil will be de-compacted, and the site will be restored to the pre-construction condition and re-vegetated in accordance with the SWPPP and/or construction stormwater permits.

In all cases, Project Owner, or their subcontractor as applicable, shall ensure all applicable OSHA, security, safety and health requirements are complied with during the removal and

decommissioning of the BESS and its related equipment.

The United States (US) Environmental Protection Agency (EPA) has guidelines for responsible disposal and recycling of lithium-ion batteries that have reached end of life (Title 40 Code of Federal Regulations Part 273: Standards for Universal Waste Management). Additionally, lithium-ion batteries are classified by the US Department of Transportation (DOT) as Class 9 hazardous materials. All applicable requirements related to the packaging, labelling, transportation, and disposal or recycling of the lithium-ion batteries will be followed during the decommissioning process. contained in the Code of Federal Regulations, Title 49, Subchapter C, Parts 171-180, or the applicable regulation will be followed.

1.1.2 Steel Foundation Posts

All structural foundation steel posts used to support the battery enclosures and other equipment will be pulled out to full depth, removed, processed to appropriate size, and shipped to a recycling facility. The posts can be removed using back hoes or similar equipment. During decommissioning, the area around the foundation posts may be compacted by equipment and, if compacted, the area will be decompacted in a manner to adequately restore the topsoil and sub-grade material to a density consistent for vegetation.

1.1.3 Pad Mounted Transformers

All pad mounted transformers within the BESS Facility will be disconnected and disassembled. The parts will be removed from the site and recycled, consistent with applicable regulations and industry standards. The concrete transformer foundations will be removed, crushed, loaded onto trucks, and disposed as construction debris at a licensed disposal facility. All unexcavated areas compacted by equipment used in decommissioning will be decompacted in a manner to adequately restore the topsoil and sub-grade material to a density similar to the surrounding soils. All materials will be removed from the site and reconditioned and reused, sold as scrap, recycled, or disposed of appropriately, at the owner's sole discretion, consistent with applicable regulations and industry standards.

1.1.4 Fence

All fence parts and foundations will be removed from the site and reconditioned and reused, sold as scrap, recycled, or disposed of appropriately, consistent with applicable regulations and industry standards. The surrounding areas will be restored to pre-construction conditions.

1.1.5 Access Roads

Facility access roads will be used for decommissioning purposes, after which removal of roads will be discussed with the Landowner and one of the following options will be pursued:

1. After final clean-up, roads may be left intact through mutual agreement of the landowner and the owner unless otherwise restricted by federal, state, or local regulations. If a road is to be removed, aggregate will be removed and shipped from the site to be reused, sold, or disposed of appropriately, at the Owner's sole discretion, consistent with applicable regulations and industry standards. Clean aggregate can often be used as "daily cover" at landfills for no disposal cost. All internal service roads are constructed with geotextile fabric and eight inches of aggregate over compacted subgrade. Any ditch crossing connecting access roads to public roads will be removed unless the landowner requests it remains. The subgrade will be decompacted in a manner to adequately restore the topsoil and sub-grade material to a reintroduction of farming.
2. Topsoil that was stockpiled during the original construction will be distributed across the open area. Finally, the access road corridors will be restored to an agricultural condition.

1.1.6 Substation

Decommissioning of the project substation will be performed with the rest of the Facility. All steel, conductors, switches, transformers, and other components of the substation will be

disassembled and taken off site to be recycled or reused. Foundations and underground components will be removed to depth. The rock base will be removed using bulldozers and backhoes or front loaders. The material will be hauled from the site using dump trucks to be recycled or disposed at an off-site facility. Additionally, any permanent stormwater treatment facilities (e.g., infiltration ponds and engineered drainage swales) will be removed. Topsoil will be reapplied to match surrounding grade to preserve existing drainage patterns. Topsoil and subsoil will be decompacted in a manner to adequately restore the topsoil and sub-grade material for the reintroduction of farming.

1.1.7 Overhead Gen-Tie Cables and Lines

Overhead gen-tie lines, support poles, and attachments will be removed from the project and taken to a recycling facility.

1.2 Reclamation

The Owner will restore and reclaim the site to the pre-battery energy storage system condition. The Owner assumes that most of the site will be returned to farmland and/or pasture after decommissioning through implementation of appropriate measures to facilitate such uses. In addition to the reclamation activities described above for each decommissioning activity, all unexcavated areas compacted by equipment and activity during the decommissioning will be decompacted as needed to ensure proper density of topsoil consistent and compatible with the surrounding area and associated land use. All materials and debris associated with the Facility decommissioning will be removed and properly recycled or disposed of at off-site facilities.

2.0 Best Management Practices (BMPs)

2.1 Construction Stormwater Practices

During decommissioning, erosion and sediment control BMPs will be implemented to minimize potential for erosion of site soils and sedimentation of surface waters and waters of the state. Because decommissioning will entail disturbance of more than one acre of soil, the Applicant will prepare a Stormwater Pollution Prevention Plan (SWPPP) and obtain coverage under the state-specific National Pollutant Discharge Elimination System (NPDES) permit prior to initiating soil disturbing activities. Potential BMPs to be implemented during decommissioning activities are described below and will be subject to refinement in the SWPPP. The decommissioning team will review the permitting requirements at the time of decommissioning and obtain any other necessary permits, which may include a US Army Corps of Engineers Section 404 Permit to Discharge Dredged or Fill Material.

2.1.1 Erosion Control

Erosion control measures will be refined based on the standard of practice current at the time the SWPPP is developed for decommissioning. All disturbed areas without permanent impermeable or gravel surfaces, or planned for use as crop land, will be vegetated for final stabilization. All slopes steeper than 4:1 should be protected with erosion control blankets. Restoration should include seed application prior to application of the blanket. All slopes 4:1 or flatter should be restored with seed and mulch, which will be disc anchored.

2.1.2 Sediment Control

Sediment controls, such as silt fence, fiber logs, dewatering practices, construction entrances, and sedimentation traps and/or basins will be implemented during construction to prevent the transport of sediment off-site during decommissioning activities. Street sweeping/scraping will also be implemented to mitigate potential tracking of sediment onto public roadways.

2.1.3 Controlling Stormwater Flowing onto and Through the Project

Given the low gradient of the slopes in the project area, controlling stormwater flow that enters the project area will likely require minimal effort during decommissioning activities. Only newly disturbed areas may require new, temporary stormwater control. If necessary, water may be diverted around the project site using diversion berms.

2.2 Permitting

All decommissioning and reclamation activities will comply with Federal and State permit requirements. Decommissioning activities that will disturb more than one acre of soil will require coverage under the state-specific NPDES permit for construction stormwater. The permits will be applied for and received prior to decommissioning construction activities commencing. A SWPPP will be developed prior to filing for construction stormwater permit coverage.

If necessary for decommissioning activities, wetlands and waters permits will be obtained from the US Army Corps of Engineers (USACE). A Spill Prevention, Control, and Countermeasure (SPCC) Plan for decommissioning will likely also be required for decommissioning work.

2.3 Health and Safety Standards

Work will be conducted in strict accordance with the Applicant's health and safety plan. The construction contractor hired to perform the decommissioning will also be required to prepare a site-specific health and safety plan. All site workers, including subcontractors, will be required to read, understand, and abide by the Plans. A site safety office will be designated by the construction contractor to ensure compliance. This official will have stop-work authority over all activities on the site should unsafe conditions or lapses in the safety plan be observed.

3.0 Timeline

It is anticipated that the decommissioning activities for the project can be completed in a 16 - week period. The estimated costs for decommissioning are tied to assumptions about the amount of equipment mobilized, the crew sizes, weather and climate conditions, and the productivity of the equipment and crews.

4.0 Decommissioning Costs

The decommissioning costs will be calculated during the building permit phase of the project using current pricing at that time. The decommissioning costs will include an estimate for the total cost of decommissioning as well as the salvage value through the life of the project. The net costs will be calculated as the decommissioning costs minus the credit for salvage value. The estimate of net costs will be updated, and audited periodically over to the life of the project to recognize price trends for the decommissioning costs. The salvage and resale values of the components will updated periodically as well to reflect industry standard values.