

## Pivot Solar 20 LLC – Decommissioning

The useful life of each phase of the solar facility is expected to be up to 40 years. At the end of the project's useful life, Pivot will suspend operations and decommission the plant, which will include any necessary demolition, removal of above and below ground equipment, and site reclamation efforts. Pivot's obligation under the Solar Lease Agreement is to return the site to the landowner in substantially the same condition that the property was in prior to the improvements being made.

This document establishes a detailed plan for decommissioning and reclamation activities once the project reaches the end of its useful life. The proposed activities will likely need to be refined throughout the project's life to reflect future best practices of the solar industry.

Pivot has assumed the planning process will be initiated one to two years prior to the anticipated end of commercial operation. The final plans will be developed in consultation with the Town of Johnstown and any other applicable agencies that have jurisdiction of activities in the decommissioning process.

### *1. Decommissioning Project Elements and Milestones*

The key tasks of project decommissioning are divided into related activities that represent milestones in the process. Each activity is described in further detail below. The decommissioning schedule reflects the conceptual timing of the milestones and overall process.

The individual project components to be decommissioned will either be 1) recycled or reused to the maximum extent practicable, or 2) removed from the site and disposed of at an appropriately licensed disposal facility. The general decommissioning approach will be the same whether a portion of, or the entire Project is decommissioned.

The activities involved in the facility closure will depend on the expected future use of the site. Certain facility equipment and features may be left in place at the property owner's request, such as transmission facilities, roads, and drainage features. At the time of decommissioning, a plan will be submitted to the County proposing the equipment that will be removed and, if applicable, equipment that will remain, based on expected future use of the site.

Pre-closure activities include final closure and reclamation planning, which identifies measures to be taken to restore the site to near pre-construction conditions. This includes but is not limited to the following:

- Complete an analysis of the project materials and their composition to identify those specific components that may be recycled, re-used, scrapped, or sent to disposal sites; as well as identifying specific recycling facilities and disposal sites for materials.
- Coordinate with local officials to obtain permits and develop plans for the transportation of materials and equipment to and from the site.
- Develop specifications for demolition and reclamation, which will serve as the basis for contractor bids for decommissioning the project and establish the scope of demolition and reclamation, including developing reclamation plans in compliance with local, state, and federal regulations.

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During the planning process Pivot will brief the County and other applicable agencies on the decommissioning process and plans. All necessary permits and approvals required for the decommissioning will be obtained prior to commencing operations.

The first step in the decommissioning process will be assessing existing site conditions and preparing the site for demolition. Site decommissioning and equipment removal is expected to take up to one year. Therefore, access roads, fencing, some electrical power, and other facilities will temporarily remain in place for use by the decommissioning workers until no longer needed. Demolition debris will be placed in temporary onsite storage areas pending final transportation and disposal and/or recycling according to the procedures listed below.

A plan will be implemented for de-energizing portions of the facility to allow safe decommissioning and formal lock out and tag out procedures. This will ensure all electrical components are placed and maintained in a safe condition for demolition activities prior to the start of work.

### **PV Module and Tracker Removal and Recycling**

During decommissioning, project components that are no longer needed will be removed from the site and Recycled, reused or disposed of at an appropriately licensed disposal facility. The first operation is to disconnect and remove modules from the tracker assemblies.

Next, the tracker and mounting structures, DC wiring materials, and combiner boxes will all be disassembled and segregated for disposal or salvage. Steel piles that support the PV racking system will be removed and either re-used or recycled to the maximum amount possible. Below ground portions of the supports will either be removed or cut off at least two feet below ground surface and left in place.

The demolition debris and removed equipment will be safely removed from the premises and transported to an appropriately licensed disposal facility or recycling center. Photovoltaic modules will either be re-used, recycled or disposed of in accordance with applicable laws at the time of decommissioning.

### **Roads**

Onsite access roads will remain in place during the decommissioning process. The roads may remain intact after decommissioning if the property owner deems them beneficial for the future use of the site. Roads that will not be used after the solar project's decommissioning will be removed at the end of the process.

### **Fencing**

Project site perimeter fencing will be removed at the end of the decommissioning project, unless it may be utilized for future use of the site and the property owner requests the fence remain in place. This includes the removal of all posts, fencing material, gates, etc. to return the site to pre-project condition.

### **Transportation and Clean-up**

During the disassembly and demolition process, materials will be segregated and temporarily placed in gathering areas for transportation. Various materials including, but not limited to, concrete, steel, aluminum, and copper will be temporarily stockpiled at or near a designated processing location pending transport to an appropriate offsite recycling facility. All such materials will then be transported from the site to approved designated facilities for

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recycling, scrapping or disposal. All metals will be recycled to the extent practical given the recycling options available at the time of decommissioning.

In general, the decommissioning will be undertaken using traditional heavy construction equipment including, but not limited to, front end loaders, cranes, track mounted and rubber-tired excavators, bull dozers, and scrapers. Areas where excavation is required will be backfilled with natural material and compacted. Any voids left from the removal of foundations will be backfilled with surrounding subsoil and topsoil and fine graded to ensure suitable drainage and reclamation of natural grades.

Soil management and re-contouring operations will be conducted so as to minimize the surface area disturbance and implement the activities in the safest and most efficient manner and in accordance with applicable local requirements. Major earthwork is not anticipated as construction of the site will not alter the general grade across the site.

To account for post-decommissioning dust control, areas of exposed soils will be revegetated, consistent with the expected future use of the site and State or County requirements. The native dry grass vegetation will be reestablished to prevent the spread of weeds. Mulching or palliatives may be used for temporary dust control until vegetation is established.

### **Monitoring Site Restoration**

Upon completion of the decommissioning process, a one-year restoration monitoring period will begin. Monitoring will ensure that grading and drainage implemented is successful in stabilizing water flow patterns and that the cover vegetation (native dry grass vegetation or other depending on land use) will be reestablished to prevent the spread of weeds. Corrective actions will be implemented if such monitoring determines adverse conditions are present as a result of an inadequate restoration.