

Jerry Smith Storage Decommissioning Plan

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Summary

Purpose

This Decommissioning Plan provides an overview for the safe and proper retiring of the Robinson Road Storage Battery Energy Storage System (BESS) facility at the end of its operational life and ensuring all activities are performed in compliance with regulatory standards.

Project Overview

The Robinson Road Storage project is located within parcel 339 Jerry Smith Road, Lansing, NY, 14882. The project consists of an energy storage system with a system capacity of 5,000 kW/ 23,500.8 kWhs which includes Six (6) Tesla Megapack 2XL BESS units, ancillary electrical equipment and fencing. The total fenced in area of the BESS is 9,689 ft² and is expected to be installed as shown in Figure 1. The expected operational life of the BESS facility is 20 years, which is assumed under the guidance of the Original Equipment Manufacturer (OEM).

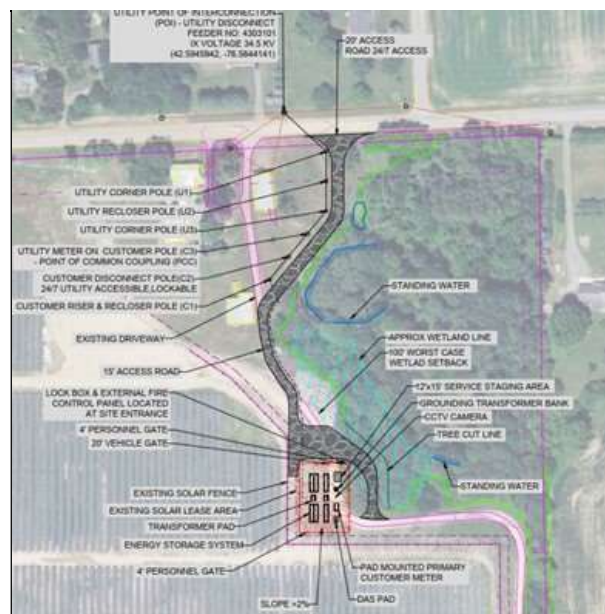


Figure 1 BESS layout

Requirements

Decommissioning will be conducted in accordance with the New York State regulations, ensuring all system equipment/components are removed, recycled, and/or disposed of safely and properly. This includes but is not limited to adhering to the following:

- Town of Lansing Building Code
- NFPA 855 2026 Edition
- 2025 FCNYS
- NYSDEC
- NYSEG DER Interconnection Guidelines

Introduction

Overview

Decommissioning activities will ensure that the site is suitable for future use by removing all equipment and its components' parts of the BESS. This will be performed to restore the site to its pre-construction condition. This protocol includes the disconnection, dismantling, material recycling, and land restoration.

Pre-planning Activities

The following activities will be done in pre-planning:

- Review and update the decommissioning plan and funding mechanism
- Establish a detailed decommissioning schedule with clear milestones
- Notify stakeholders, including local Authorities Having Jurisdiction (AHJs) and utility companies (NYSEG) at least Six (6) months before decommissioning activities begin, with Lansing Fire Department receiving written notice at least 30 days prior to the start of decommissioning
- Gather technical documents, equipment manuals, engineering drawings, material safety data sheets (MSDS) and transportation guidelines
- Secure necessary permits and approvals

Decommissioning Process

Equipment Removal

Decommissioning will proceed in the reverse order of installation, with activities including the following:

1. Electrical disconnection
 - a. Disconnect the BESS from Grid and ancillary electrical equipment
 - b. Remove above and underground electrical lines/cables, poles, and conduits
2. Removal of Major Components
 - a. BESS units (including batteries and inverters), MV transformers, and other electrical equipment will be removed and transported to certified and pre-approved facilities
 - b. Hazardous materials, including batteries and transformer oil, will be managed as per EPA, DOT, and NYSDEC standards
 - c. NYSEG Interconnection Equipment:
 - i. Remote trip/SCADA disconnect will be disconnected and decommissioned
 - ii. Metering equipment will be removed and returned to NYSEG
3. Structural Removal
 - a. Dismantle and recycle fencing, concrete foundations, and equipment pads
4. Debris and Waste Management
 - a. Separate and transport waste to approved recycling and/or disposal facilities

Material Recycling and Disposal

The following materials will be recycled and disposed of:

- Batteries will be transported to OEM and their recycling partners for proper recycling and disposal
 - Due to the nature of energy storage facilities, a Tesla Megapack 2XL specific decommissioning plan is provided within Appendix 1 (Tesla Megapack 2XL Operations

and Maintenance Manual). This plan is developed by the OEM and is intended to guide owner/operators of the energy storage system.

- Transformer oils will be sent to certified facility
- Metals and wiring will be salvaged for recycling
- Concrete foundations will be broken and transported for reuse
- Gravel and geotextiles will be reused where possible or sent to approved facilities

Site Restoration

Site restoration will include the following:

- Grade disturbed areas to restore drainage patterns to the original design
- Apply topsoil and reseed with a native seed mix to prevent the possibility of erosion
- Verify restoration quality through inspections and photographic documentation

Town of Lansing final sign-off and restoration inspection will be conducted to confirm all structures are removed or restored.

Environmental Safety and Impact

Safety Protocols

A comprehensive environmental Health & Safety Plan (EH&S) will be developed and will govern all decommissioning activities. This plan will comply with OSHA standards (29 CFR 1910.120) and incorporate best practices for protecting workers and the community. The key components of this plan includes but is not limited to the following:

- Job Hazard Analysis (JHA): Detailed risk assessment for each job/task, identifying potential hazards and their mitigating measures
- Personal Protective Equipment (PPE): Appropriate PPE will be provided to workers, including arc flash suits, gloves, etc., based on the nature of the work activity
- Fire Prevention and Control:
 - All fire protection systems will remain operational during decommissioning
 - Fire department will be made aware of the decommissioning activities in the event an emergency arises
- Emergency Response Plan:
 - Site-specific procedures for handling emergencies such as fires, thermal runaway, chemical spills, or injuries will be available, and the fire department would have been trained with respect to this plan.
 - Coordination with local emergency response teams and Lansing Fire Department for incident management.
- Emergency Response Access:
 - Nexamp will ensure that Lansing Fire Department will have site access and keys (if required) during the decommissioning phase
- Site Security:
 - Fencing and restricted zones will ensure unauthorized personnel are kept out of active work areas.

- Security measures will also safeguard equipment and prevent theft and/or vandalism.

Hazardous Material Handling

The handling and disposal of hazardous materials, such as lithium-ion batteries and transformer oils, will follow local and federal regulations, including those outlined in EPA standards. Key protocols include but are not limited to the following:

- Identification of Hazardous Materials: A thorough inventory of all regulated materials, including batteries, transformers, and associated electrical equipment.
- Containment and Transportation: Ensuring all hazardous materials are securely packaged, labeled, and transported to certified facilities using licensed hazardous material handlers/carriers.
- Spill Prevention and Control:
 - A Spill Prevention, Control, and Countermeasure (SPCC) Plan will be implemented to address potential leaks or spills during the dismantling process.
 - Secondary containment systems will be utilized for any containers exceeding 55 gallons
 - Each Tesla Megapack 2XL includes a plenum for electrolyte (hazardous material in the lithium-ion battery) leakage that has the potential to contain 200+% of the hazardous material present in a single Megapack 2XL unit
 - Trained personnel will manage cleanup of any spills, and incidents will be reported to the appropriate authorities

Lithium-ion batteries have a hazard classification of Class 9. As such, the shipping UN 38.3 classifications for the batteries ensure that safe transportation and labeling compliance can be achieved.

Stormwater Management

Nexamp will implement any required stormwater management controls as required by local AHJs and ensure compliance with the New York State Department of Environmental Conservation (NYSDEC) at the time of decommissioning. Specific measures include:

- Minimizing soil disturbance and controlling sediment runoff during decommissioning activities.
- Stabilizing disturbed areas with appropriate erosion and sediment control methods, such as silt fencing and sediment traps.
- Regular monitoring of stormwater discharge to ensure compliance with State Pollutant Discharge Elimination System permit conditions.

If any potential contaminated areas are disturbed, appropriate mitigation will be undertaken in coordination with the NYSDEC and regional water management authorities.

Financing

Robinson Road Storage, LLC will pay for the decommissioning of the system from the existing balance sheet.

Decommissioning Timeline

The following table provides an overview of the Decommissioning Timeline:

Table 1 Decommissioning Timeline

Decommissioning Activity	Timeline (Months)
Stakeholder Notifications	0-6
Permitting and Approvals	2-6
Equipment Removal and Recycling	6-9
Site Restoration	9-15
Final Reporting	15

The decommissioning process for the facility will adhere to a structured and carefully planned timeline to ensure the safe dismantling, compliance to regulations and OEM guidance, and thorough site restoration. The Decommissioning activities outlined in Table 1 are outlined in greater detail below:

1. Stakeholder Notifications (Months 0-6)

In this activity, Nexamp will notify all stakeholders of the intent to decommission the BESS facility. Notifications will be issued to Lansing Building Department, NYSEG, OEMs, and relevant AHJs (local and federal). A stakeholder list will be updated to include all involved and responsible parties, and preliminary discussions regarding permits and approvals will commence.

2. Permitting and Approvals (Months 2-6)

In parallel with Stakeholder Notifications, Nexamp will secure all necessary permits and approvals for decommissioning activities. This activity includes the submission of permit applications for decommissioning, environmental reviews, and compliance certifications. Nexamp will coordinate with regulatory agencies to ensure that all documentation is updated, complete, and compliant with the latest standards and best practices. Preparations for safe material handling and waste management will be finalized in this activity.

3. Equipment Removal and Recycling (Months 6-9)

The physical dismantling of the Facility will begin at month six and its activities include:

- a. Disconnecting the BESS from the electrical grid and ancillary equipment
- b. Removing above and underground components
- c. Transporting recyclable materials
- d. Handling and disposing of hazardous materials per EPA and NYSDEC guidelines

This phase ensures that all components are safely removed while maximizing recycling opportunities to minimize the environmental impact of the Facility and its decommissioning.

4. Site Restoration (Months 9-15)

Once all equipment has been dismantled and removed from the site, Nexamp will restore the site to a vegetated and vacant condition. Restoration activities include:

- a. Grading the land to match the original drainage patterns
- b. Applying topsoil and seeding to disturbed areas with native seed mix to stabilize soil and prevent any erosion
- c. Conducting inspections to verify restoration quality

- d. Review of restoration activities with local AHJs for approval
5. **Final Reporting (Month 15)**
- Nexamp will prepare a comprehensive decommissioning report as part of the final reporting activity. This document will detail the timeline and milestones, components removed and their whereabouts, final site conditions (with photographs and inspection results), and compliance validation to regulation and permits. The report will be submitted to any relevant AHJs to confirm the successful completion of the decommissioning process of the Facility.

Appendix 1 – Tesla Megapack 2XL Operations and Maintenance Manual