

## Benz Solar Project - Decommissioning Memo

This memo describes a Decommissioning Plan that establishes the approach to conduct decommissioning activities for the permanent closure of the Facilities at the end of the Facilities' useful life or the permanent cessation of the Facilities' operation, whichever comes first. The Plan describes the approach for removal and/or abandonment of facilities and equipment associated with the Facilities and describes anticipated land-restoration activities.

### DECOMMISSIONING ACTIVITIES:

Decommissioning will involve removal and disposal or recycling of all above-surface Project components. All recyclable materials will be transported to the appropriate nearby recycling facilities. Any non-recyclable materials will be properly disposed of at a nearby landfill. 95% or greater of the Facilities' components will be recyclable.

#### *Decommissioning Preparation:*

The first step in the decommissioning process will be to assess existing site conditions and prepare the site for demolition. Site decommissioning and equipment removal can take up to six months to complete for a project of this size. Therefore, access roads, fencing, and electrical power will temporarily remain in place for use by the decommissioning and site restoration workers until no longer needed. Demolition debris will be placed in temporary on-site storage areas pending final transportation and disposal/recycling according to the procedures listed below.

#### *PV Equipment Removal and Recycling:*

During decommissioning, all the Facilities components will be either removed from the site and recycled or abandoned in place 12 inches below grade (for underground conduit). Equipment removal will include all pad-mounted cabinets, above ground and in conduit wiring, solar modules, solar module racking, transformers, switchgear, inverters, and panel boards. Major equipment such as transformers will be recycled or rebuilt for future uses.

Steel beams that supported the module racking and inverters/panelboards will be mechanically pulled out of the ground; any resulting holes will be backfilled with on-site soil to match existing site soil conditions. The concrete transformer and interconnection equipment pads will be broken up and removed from the site.

Demolition debris and removed equipment may be cut or dismantled into pieces that can easily be transported from the site. The majority of steel and aluminum will be processed for transportation and delivered to an off-site recycling center. The solar modules will be palletized and transported to the nearest recycling facility that will accept them. Minimal non-recyclable materials are anticipated; these will be properly disposed of at the nearest qualified disposal facility.

#### *Internal Power Collection System:*

The DC and AC power collection system will be dismantled and removed. All underground cables will be removed from conduit and recycled. Conduit associated with DC and AC power, may remain in place at a depth of 12 inches below ground surface. All conduit that is removed will be recycled.

#### *Access Roads:*

The onsite access driveway will remain in place to accomplish decommissioning at the end of the facility's life. At the time of decommissioning, if the landowner determines that this road will be beneficial for the future use of the site, the access road may remain in place after decommissioning. The future use of the site is currently undetermined, but it is assumed that the access to the site will remain unchanged for future development of the parcel.

#### *Security Fence:*

The chain link perimeter security fence will remain in place during decommissioning activities for site safety and security purposes. At the time of decommissioning, if the landowner determines that this fence will be beneficial for the future use of the site, the fence may remain after decommissioning. The future use of the site is currently undetermined. If the fencing is not used, it will be removed and transported to the nearest steel recycling facility. Holes left behind by the fence support posts will be backfilled with on site soil and will be seeded to match existing onsite groundcover.

#### *Landscaping:*

The double row of screening vegetation along certain areas of the northern and western perimeter of the Site will remain in place during decommissioning activities for site safety and security purposes. At the time of decommissioning, if the landowner determines that this landscaping will be beneficial for the future use of the site, the landscaping may remain after decommissioning. The future use of the site is undetermined at this time. If the landscaping is not used, it will be removed and transported to the nearest plant material disposal facility for composting or mulching. Shrubs, bushes, and trees would be stump cut to just below ground level.

#### *13.8 kV Interconnection Line:*

The interconnection cabling that runs East from the project and across Benz Street to connect the Facilities to the UI distribution circuit will remain in place during decommissioning activities to provide electric service onsite during decommissioning. At the time of decommissioning, if the landowner determines that this electric service line will be beneficial for the future use of the site, the line may remain after decommissioning. If the line is not used, it will be removed per UI guidelines and transported offsite to the nearest recycling facility.

## SITE RECLAMATION:

After the Facilities are completely decommissioned, and all equipment has been removed from the Site, additional activities will be performed to ensure appropriate surface drainage patterns and establishment of groundcover of disturbed areas.

### *Restoration Process:*

Site Restoration activities associated with decommissioning are anticipated to be very minimal. Ponds and swales will remain in place as constructed for the solar facility. The grading and sitework performed for the solar facility will have created a rolling terrain suitable for a variety of future development options for the site.

Reclamation will restore vegetative cover disturbed by the removal of equipment. The process will involve the replacement of topsoil and vegetation, as well as modification of site topography where necessary to maintain appropriate site drainage.

If any soils are determined to be compacted at levels that would affect successful revegetation, decompaction will occur. The method of decompaction will depend on how compacted the soil has become over the life of the Project.

### *Monitoring Activities:*

The Site will be monitored after Site Reclamation activities are complete to confirm that any earthwork and revegetation was performed correctly and last permanently. The Site will be periodically inspected (at least twice annually) to ensure appropriate stabilization and groundcover is established during the reclamation process. Any deficiencies will be immediately corrected. This monitoring will continue for a period of five years, or until the Site is redeveloped for a future use, whichever comes first.