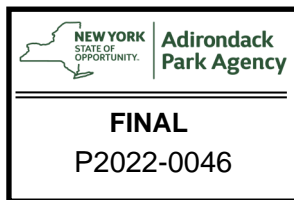




Decommissioning Plan

20.0MW Ground-Mounted Solar Array

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**BR Benson Mines
20.0MW Solar Array, Town
of Clifton, St. Lawrence
County, New York**

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1.0 Background

On behalf of the New York State Energy Research and Development Authority (NYSERDA), TRC has prepared this draft Decommissioning Plan (Plan) for the proposed BR Benson Mines Solar Facility (the Facility) located on lands north and south of State Route 3, in the Town of Clifton, New York. The proposed Facility consists of a 20.0 megawatt (MW) alternating current (AC) solar power generation facility encompassing approximately 111.5 acres and will interconnect at the 34.5kv transmission lines north of the Star Lake substation.

The intent of this Plan is to provide criterion for when the facility will be deemed out of service, describe the general scope of decommission work, including plans for disposal of solar panels and other Facility components, restoration of the site, and provide a cost estimate to execute this Plan.

1.1 Facility Description

The proposed facility will be constructed on the former Benson Mines tailings field and will interconnect at the 34.5kv lines north of the Star Lake substation.

Facility components are planned to consist of the following site features:

- 9,370 linear feet of 7-ft perimeter chain link fence encompassing approximately 111.5 acres;
- Approximately 7,450 linear feet of gravel access roads;
- 62,235 photovoltaic (PV) solar modules (i.e., “panels”);
- 641 single-axis tracker racking frames and associated tracking motors;
- Eight (8) concrete equipment pads each supporting a medium voltage transformer and inverter unit;
- Approximately 8 utility poles at the point of interconnection
- Approximately 1,200 linear feet of underground conduit and conductors;
- Approximately 78,000 linear feet of underground collector lines and conduit
- Roughly 13,800 linear feet of bypass and conveyance swales, and three (3) basins for water quality treatment.

2.0 Decommissioning Activities

Facility decommissioning will consist of the following major steps:

- Dismantle and Disassemble;
- Disposal and Recycle; and
- Site Restoration and Stabilization.

2.1 Dismantle, Demolish, and Disposal or Recycle

A significant portion of the photovoltaic system at the Facility will include recyclable or re-saleable components, which include copper, aluminum, galvanized steel, concrete, electric motors, and PV modules. Due to their resale value, these components will be dismantled and disassembled rather than being demolished and disposed.

Prior to commencing decommissioning, the Facility Owner/Lessee will coordinate with National Grid to determine schedule and procedure for disconnecting facility infrastructure from the point of interconnection. Once disconnection is completed, all Facility electrical connections will be disconnected and tested to confirm the system is de-energized prior to starting decommissioning.

Decommissioning activities shall be undertaken by the Facility Owner/Lessee or their Contractor in accordance with this Decommissioning Plan. Prior to any earth disturbance, a Stormwater Management Plan including an Erosion and Sediment Control Plan needs to be provided by the qualified decommissioning individual. If the proposed soil disturbance is greater than one acre, then a NYSDEC SPDES general permit for stormwater discharges from construction activities is required, including a stormwater pollution prevention plan (SWPPP). All best management practices (BMPs) should be installed per the Stormwater Management Plan prior to any ground disturbing activities related to decommissioning.

All electrical connections to the PV modules will be disconnected and the modules removed from their framework by cutting or dismantling the bolted connections to the supports. Modules will then be removed. The interior materials of the PV modules are silicon-based and are not considered hazardous materials. In the event of a total module fracture during removal, these modules should be permissible for disposal at a licensed landfill. The Owner/Lessee's decommissioning contractor will be responsible for assessing condition of PV modules and managing for proper disposal throughout removal procedure.

The photovoltaic module frame and racking system and all other metal components, including driven support posts, will be disassembled, and removed from the site for recycling, salvage, or disposal. Removal of the perimeter fence will be contingent on the future anticipated use of the site following decommissioning and will remain in place if the Landowner wishes to keep the fencing for future use.

Any aboveground utility poles belonging to the Facility and not the interconnecting Utility will be completely removed and disposed of off-site in accordance with utility best practices. Underground improvements, equipment, and infrastructure including, but not limited to, racking piles, cables, conduit, and inverter pad foundations located less than three (3) feet below grade will be removed and any excavations backfilled with native material. Concrete slabs on grade will be broken onsite and removed offsite completely for crushing and recycling at an approved receiving facility.

Drainage improvements and access roads constructed as part of the Facility will remain in place at the request of the Landowner, if desired, to facilitate the future land use. Should the future Landowner wish for the drainage improvements and access roads to be removed, then these features will be removed, the ground de-compacted, and regraded to match native contours. Removed aggregate will be hauled offsite and delivered to an approved receiving facility. Geotextile fabric and geogrid will be disposed of at a landfill.

A final site walkthrough will be conducted with the Landowner to remove debris and/or trash generated within the site during the decommissioning process and will include removal and proper disposal of any debris that may have been wind-blown to areas outside the immediate footprint of the Facility being removed.

2.2 Site Restoration and Stabilization

Solar facilities are largely pervious vegetated surfaces. Decommissioning and removal of equipment should not result in excessive earth disturbance; however, some restoration and site stabilization will be required upon completion of work. The areas of the facility that are disturbed will consist of the array areas where construction vehicles travel, the corridors of the perimeter fencing, and areas where underground improvements have been installed at less than three (3) feet below grade. The site will be decompacted by disking and mixing with suitable sub-grade materials selected to support revegetation and to match the existing soil types.

3.0 Permitting Requirements for Decommissioning

It will be the sole responsibility of the Facility Owner/Lessee and their Contractor to obtain any local, State, APA, or Federal permits or approvals that may be triggered by the decommissioning activities described in this plan, prior to decommissioning. Prior to decommissioning, the Facility Owner/Lessee shall confirm it is complying with any local requirements that may include time of work hours and potential noise (dB) restrictions.

It is anticipated that disturbed areas will be seeded with a grass seed mix that has been approved by the Adirondack Park Agency (APA) and topsoil if needed. All landscaping installed by the Facility Owner/Lessee shall remain in place.

If a NYSDEC SPDES general permit for stormwater discharges from construction activities is required, including a stormwater pollution prevention plan (SWPPP), the Facility Owner/Lessee or their Contractor will be responsible for the permit from the Notice of Intent (NOI) through Notice of Termination (NOT).

4.0

The Decommissioning Plan shall be implemented upon the abandonment of the Facility, discontinuance of operations of the Facility, or expiration of the Facility Owner/Lessee's property rights as described below.

4.1 Abandonment

If the facility is not completed and functioning within 48 months of commencement of construction, the Town of Clifton or the Adirondack Park Agency may direct the Facility Owner/Lessee to complete construction and installation of the facility within 12 months. If the Facility Owner/Lessee fails to perform, the Town of Clifton, Adirondack Park Agency, or landowner/lessor may direct the Facility Owner/Lessee to implement the Decommissioning Plan. The decommissioning activities must be completed within 12 months of notification. The time periods stated herein may be extended by mutual consent of the Facility Owner/ Lessee and the notifying party.

4.2 Discontinuance of Operations

Discontinuance of operations shall mean a 24 month period during which the Facility is not producing commercially useful electricity and where such inactivity is not the result of a casualty, equipment problem, permitting matter, natural disaster, interconnection with the local utility, or financial matter that the Facility Owner/Lessee is in good faith attempting to remedy.

Upon the discontinuance of operations as defined herein, the Town of Clifton or the Adirondack

Park Agency may notify the Facility Owner/ Lessee of the facility to implement the decommissioning plan. The decommissioning activities must be completed within 12 months of notification. The time periods stated herein may be extended by mutual consent of the Facility Owner/ Lessee and the notifying party.

4.3 Expiration of Property Rights

When the Facility Owner/Lessee's lease agreement with the Landowner/Lessor has reached the end of its term, or if the Facility Owner/Lessee loses rights to the property by any means, such as an early termination of the lease, and there is no intent to extend or renew said lease, then the Facility shall be decommissioned in accordance with this Plan. The landowner shall grant the Facility Owner/Lessee a twelve (12) month easement for decommissioning and restoration the facility following expiration or termination of the lease. If the Facility Owner/Lessee fails to remove any of the facility components, or fails to restore and stabilize the site in accordance with this plan during the 12-month easement period, then the Landowner/Lessor may perform any remaining decommissioning or restoration work without notice or liability to the Facility Owner/Lessee. In such event, if the Landowner/Lessor self-performs any decommissioning work, the Facility Owner/Lessee will reimburse Landowner/Lessor for costs, less any salvage value, in accordance with the terms of the Lease Agreement.

5.0 Schedule

Decommissioning, demolition, and dismantling of the facility and site restoration and stabilization is to be completed within twelve (12) months from the date of abandonment, or discontinuance of operations, or expiration of property rights.