



Draft Decommissioning Plan

Alcazar BESS, LLC
430 Hurley Avenue, Town of Ulster

A. SITE RESTORATION AND DECOMMISSIONING PLAN

This Site Restoration and Decommissioning Plan (Plan) outlines the framework for decommissioning and reclamation of the Alcazar BESS LLC (Project Company) Battery Energy Storage Project (Project) in the Town of Ulster. The Plan describes the means and methods that may be used to remove all containers, structures, foundations, underground cables, and equipment and to reclaim and restore the land altered during the construction and operation of the Project to its pre-development conditions to the extent feasible. This Plan will be updated prior to commencing decommissioning activities based on final Project layout and design, existing site conditions, and current local, state, and federal regulations.

1. Existing Conditions and Proposed Improvements

The Project will be located at 430 Hurley Ave, Hurley, Ulster County, 12443, a 15-acre parcel, APN: 48.17-1-26 (Property) , that is the site of the former Coleman High School, which is currently closed and deteriorating. The Project Company is documenting the existing condition and working with New York State Historic Preservation Office regarding the proposed demolition. The portion of the Property located closest to Hurley Ave is currently undeveloped and served as athletic fields for the former school. In addition to the vacant school, there are existing access roads and parking areas on the Property that will be removed or modified as part of the construction of the Project. The rear of the property is undeveloped and adjacent to the I-87 corridor.

Utility-scale energy storage technologies available on the market today are typically designed to last for a minimum of 20 years. The batteries and other equipment will be continually maintained throughout the life of the Project.

BESS Facility Components

The storage system consists of battery banks housed in outdoor, purpose built enclosures and buried electrical conduits. The system includes air conditioners or heat exchangers, inverters and other ancillary electrical equipment. Roughly 240 battery enclosures measuring approximately 50 feet by 10 feet and a max of 14 feet tall will be installed on piles or concrete foundations. The Project will use commercially available lithium-ion battery technology, including but not limited to LFP (lithium iron phosphate), NMC (nickel manganese cobalt), and NCA (nickel cobalt aluminum) batteries.

Project Substation

The on-site Project substation will step-up the medium voltage collection system for the BESS system from 34.5 kV to 345 kV. The substation would terminate the medium

voltage feeders to several common medium voltage buses and transform the power at these buses to the high voltage required for transmission on the Project gen-tie line to the Central Hudson 345kV Hurley substation located adjacent to the Project site and across Hurley Avenue to the north. The internal arrangements for the substation will include:

- Power and auxiliary transformers with foundations
- Prefabricated control building(s) to enclose the protection and control equipment, including relays and low voltage switchgear
- Metering stand
- Capacitor bank(s)
- Circuit breakers and disconnect switches
- Up to two microwave towers
- Dead-end structure(s) to connect the step-up Project substation to the grid

A. PERFORMANCE CRITERIA

The list below includes site restoration performance criteria proposed for Project decommissioning.

1. Safety During Removal of Systems

During the decommissioning process, critical support equipment should remain operational to the extent possible. During removal, there will be a review of all systems adjacent to and supporting the BESS that may be impacted by decommissioning and the Project Company will determine means of protecting said systems. These systems include but are not limited to: structural elements, means of egress, fire detection and suppression systems and interface points, communications equipment, and electrical interconnection equipment including the on-site POI Substation.

2. Environmental Impacts

The goal of decommissioning is the safe and efficient removal of all the batteries and battery storage energy facility components. The reclamation of the site to conditions as

close to pre-construction characteristics as possible. Erosion control and storm water management measures are utilized to maintain water quality and prevent soil erosion and water runoff. All above ground facilities will be removed and reseeded will take place.

3. Aesthetics

Aesthetically, after decommissioning, the Facility Site should be in as close to pre-construction condition as possible. That will be accomplished by removing all above ground facilities and restoring the areas where facilities have been removed and reseeded the affected areas.

4. Salvage and Recycling

To the extent possible, all Project materials will be salvaged and/or recycled. If possible, facilities will be removed, relocated and reused. Metal facilities (steel, copper, aluminum) if not reused, will be salvaged and sold for scrap metal that can be recycled for use for other manufacturing purposes.

5. Potential Future Uses for the Site

The Property and Project site has multiple future potential uses, especially considering that Project Company is covering the expense of demolition of the former school. The Project Company or future landowner at the time of decommissioning will determine the future use at their discretion.

6. Useful Life

The useful life of the Project is a minimum of 20 years.

B. DECOMMISSIONING AND REMOVAL PLAN

All decommissioning, reclamation, and restoration activities will adhere to the requirements of appropriate governing authorities, and will be in accordance with all applicable federal, state, and local permits.

1. Plan for Decommissioning and Restoration

The Applicant has prepared the Plan to outline the methods and means to decommission the Project at the end of the Project's useful life. The purpose of the Plan is to identify

the methodology to be used to mitigate potential impacts resulting from the cessation of operation of the Facility.

The Project will have an economical and technological lifetime of a minimum of 20 years. At the end of its life the Project will be decommissioned, and batteries, racks, ancillary equipment, building and infrastructure subsequently removed.

In general, facility decommissioning will occur in the general sequence outlined below:

- Disconnect Battery Racks within containers
- Remove Battery Racks
- Battery Disposal
- Remove Racks
- Remove Cabling
- Remove Electrical Equipment (Inverters, Transformers, Switchgear, Gen-tie line, etc.)
- Breakup Foundations
- Remove Stone
- Demolish/Remove Asphalt
- Remove Fence
- Backfill
- Bring in Topsoil / Grading
- Seeding

The United States 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 U.S. Department of Transportation as Class 9 hazardous materials. All applicable requirements related to the packaging, labeling, 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.

Prior to commencing reclamation of the BESS site, 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 containers. Hazmat training will also be conducted for all qualified personnel handling lithium-ion (or other) batteries during the process.

The battery facility will be fully discharged to the minimum state of charge required for removal and safe transportation as per battery manufacturer specifications. The battery modules will be removed from their racks, repackaged on site, and shipped intact to a regional recycling hub within 500 miles of the Project Site. No disassembly of battery modules will be required on-site, and the battery terminals will be taped off to avoid any potential for a short to occur. In the event of any breakage or damage to individual battery modules, such modules will be placed in individual, non-metallic inner packaging that completely encloses the cell.

The refrigerant/coolant from heating, ventilation, and air conditioning (HVAC) units will be collected into separate containers 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. Similarly, all fire suppression units will be cleared of the suppression fluids and sent to the suppliers for reuse following the industry standard practice. All electrical equipment 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, 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, consistent with applicable regulations and industry standards. Clean aggregate can often be used as "daily cover" at landfills for no disposal cost. All pile foundations will be pulled out completely. Underground cables and duct banks will be removed. Topsoil will be reapplied to the disturbed area. Soil and topsoil will be de-compacted, and the site will be restored to the pre-construction condition and revegetated in accordance with the stormwater pollution prevention plan and/or construction stormwater permits.

In all cases, Project Company, 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.

Prior to commencing decommissioning, the Project will be shut down, de-energized and disconnected from the generation tie line at the Project collection substation. The Applicant will coordinate de-energization with Central Hudson and NYISO to ensure no disruption to the overall electrical system.

All aboveground components including structures and equipment will be removed during decommissioning. In addition, all foundations and wiring will be removed to a depth of four feet below ground surface, except in cases where removal would cause impact to environmentally sensitive areas, backfilled, and then covered with topsoil.

The goal of decommissioning is the safe and efficient removal of all facility components and reclamation of the site to conditions as close to pre-construction characteristics as practicable. The same safety protocols that are used during construction will be used during decommissioning.

The decommissioning process is expected to take approximately 3 months. This time includes one-week site mobilization and preparation; ten-week period to disassemble the facility; an additional seven weeks to remove and reclaim foundations and reclamation work including grading, backfilling, erosion control activity, reseeding will take place; and an eight-week contingency period.

C. SITE RESTORATION AND RECLAMATION

Project Company will restore and reclaim the site to the extent practicable to pre-construction conditions consistent with site control agreements and in coordination with the Town during the site plan review process. The current site is encumbered with an abandoned school, roads, parking lots and associated facilities, which will be removed and not restored. After all equipment and infrastructure is removed during decommissioning, any holes or voids created by poles, concrete pads, and other equipment will be filled in with native soil to the surrounding grade. All access roads and other areas compacted by equipment during the decommissioning will be de-compacted to a depth necessary to ensure proper density of topsoil, drainage of the soil, and root penetration prior to fine grading and tilling to a condition consistent and compatible with the surrounding area and associated land use.

Project Company assumes that most of the site will be returned to vacant and/or natural vegetation after decommissioning through implementation of appropriate measures to facilitate such uses. Assuming no specific use is identified, Project Company will vegetate the site with a grassland seed mix comprised of a combination of native and naturalized grasses and forbs. The goal of the reclamation will be to restore natural hydrology and vegetative cover to the greatest extent practicable while minimizing new disturbance and removal of existing vegetation.