

# **Exhibit G**

## **Materials Analysis**

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**Biglow Canyon Wind Farm  
December 2025**

**Prepared for**



**Portland General Electric Company**

**Prepared by**



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## Acronyms and Abbreviations

AC	alternating current
BCWF or Existing Facility	Biglow Canyon Wind Farm
BESS	battery energy storage system
BIGL or Project Developer	BIGL bn, LLC
Certificate Holder or PGE	Portland General Electric Company
CFR	Code of Federal Regulations
Council or EFSC	Oregon Energy Facility Siting Council
Li-ion	lithium-ion
MW	megawatt
O&M	operations and maintenance
OAR	Oregon Administrative Rules
OAR	Oregon Administrative Rule
PV	photovoltaic
RFA	Request for Amendment
Site Certificate	Site Certificate for Amendment 3
Solar Components	photovoltaic solar energy generation and battery storage
SPCC	Spill Prevention, Control, and Countermeasure

## 1.0 Introduction

The Portland General Electric Company (PGE or Certificate Holder) submits this Request for Amendment (RFA) 4 to the Site Certificate on Amendment 3, issued October 31, 2008 (Site Certificate) for the Biglow Canyon Wind Farm (BCWF or Existing Facility) to add photovoltaic (PV) solar energy generation and battery storage (Solar Components) to the operating BCWF.

BCWF, owned and operated by PGE, is located within an approved site boundary comprising approximately 25,000 acres, approximately 4.5 miles northeast of the town of Wasco in Sherman County, Oregon. The BCWF operates under the Site Certificate from the Oregon Energy Facility Siting Council (Council or EFSC) as administered by the Oregon Department of Energy. BCWF currently consists of 217 wind turbines, with a maximum blade tip height of 445 feet, and a peak generating capacity of 450 megawatts (MW).

In RFA 4, PGE proposes to add up to 125 MW alternating current (AC) generating capacity from PV solar arrays and 125 MW in battery storage capacity (Solar Components) in approximately 1,445 acres of land sited (Solar Areas) within the existing BCWF site boundary Solar Micrositing Area (RFA 4 Site Boundary<sup>1</sup>).

The Solar Micrositing Area is approximately 1,924 acres and provides a conservative estimate of the maximum area needed for development, micrositing, and temporary disturbances from the Solar Components during construction, rather than the anticipated temporary and permanent disturbance footprint. Within the Solar Micrositing Area, the Certificate Holder has identified a reduced footprint where Solar Components will be concentrated (Solar Area; 1,445 acres). Solar Components will include solar arrays, inverters, battery energy storage system (BESS) facilities and their subcomponents (i.e., inverters), a collector substation, approximately 600 feet of a new 230-kilovolt generation tie transmission line, medium voltage collector lines, operations and maintenance (O&M) structure, site access roads, internal roads, perimeter fencing, facility entry gates, and temporary laydown areas. The maximum generating capacity from the Solar Components will be 125 MW AC, and the infrastructure will be fenced within the Solar Micrositing Area and will cover up to 1,445 acres (Solar Area).

PGE will own and operate the Solar Components as a part of the BCWF (together, Amended Facility or Facility), which, to date, have been developed by BIGL bn, LLC (BIGL or Project Developer). BIGL, in its capacity as the project developer, supports PGE in this RFA 4 and may construct and temporarily operate the Solar Components on behalf of PGE under a Build-Transfer Agreement.

The Council previously found the Certificate Holder has demonstrated an ability to construct, operate, and retire the Facility in compliance with Council standards and conditions of the Site Certificate. Exhibit G provides the information required by Oregon Administrative Rules (OAR) 345-021-0010(1)(g) in support of RFA 4. The information summarized in this exhibit and described in

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<sup>1</sup> Note, as described in further detail in Section 4.1.1.2 of the RFA 4 Division 27 document, the Solar Micrositing Area is the equivalent of the RFA 4 Site Boundary.

RFA 4 demonstrate that the Facility, as proposed, can be designed, engineered, constructed, operated, and retired in a manner that satisfies the applicable Council standards. The proposed changes in RFA 4 do not alter the Certificate Holder's ability to comply with the Council's earlier findings and applicable Site Certificate Conditions. OAR 345 Division 22 does not provide an approval standard specific to Exhibit G.

## **2.0 Materials Inventory – OAR 345-021-0010(1)(g)(A)**

*OAR 345-021-0010(1)(g) A materials analysis including:*

*OAR 345-021-0010(1)(g)(A) An inventory of substantial quantities of industrial materials flowing into and out of the proposed facility during construction and operation;*

Response: As described in Section 1.0 of RFA 4's Division 27 document (Request for Amendment 4 to the Site Certificate for the Biglow Canyon Wind Farm), the layout proposed for the Solar Components includes the following main areas with infrastructure improvements: Solar Area and associated BESS; O&M building/structures (including storage containers, office trailers, and control buildings); and one proposed collector substation with overhead electrical connection between the proposed substation and the Existing Facility's substation.

The Certificate Holder is requesting to permit a range of technology to preserve permitting flexibility and will stipulate the precise details of PV solar energy generation and supporting facilities during final design and engineering prior to construction. Therefore, this exhibit analyzes the number of materials anticipated for the Solar Components assuming the full range of proposed technologies.

In addition to the construction materials previously approved by the Council in prior iterations of the BCWF, this section describes the materials needed to support the Solar Components including up to 125 MW of solar energy generation, a BESS capable of storing up to 500 megawatt-hours, and associated infrastructure. Note that 217 wind turbines are already operating at the BCWF; thus, the materials associated with the constructed portions of the Existing Facility are not repeated for the purposes of this analysis. Similarly, the quantities of materials previously documented in previous amendments for the Existing Facility are not repeated and the quantities provided in this exhibit are for only the Solar Components. Industrial materials flowing into and out of the proposed facility during construction and operation are described below in response to OAR 345-021-0010(1)(g)(A).

### **2.1 Construction**

The solar energy generation area proposed within this RFA 4 will be composed of PV solar modules made of mono- or poly-crystalline cells supported on non-specular, galvanized steel racks and trackers and BESS equipment. The modules are inert and will not introduce any hazardous materials to the Solar Components. Each tracker will be supported by steel posts. Other on-site equipment will include buried conduits, combiner boxes, inverters, and transformers. The solar inverters and transformer stations and the associated proposed substation will require concrete

foundations made of steel reinforcing bars and concrete (gravel, sand, cement, and water), as well as additional collector line and access roads to connect to the proposed substations and electrical infrastructure. Note that for the construction of foundations, concrete will come directly from licensed suppliers (i.e., with a valid water use license) in the area; an on-site batch plant is not proposed as this time.

The BESS will use lithium-ion (Li-ion) batteries. Li-ion batteries are modular in that each unit contains multiple smaller battery pouch cells. The cells are the primary containment for the electrolyte materials. The module containing the cells is relatively small, generally about the size of a desktop computer, and serves as leak-proof secondary containment. The cells are contained within a module which is collected in a pack, and then wired into a string, and finally into the full modular unit. The quantities per modular unit could change based on the most current model procured for the Solar Components, but the general framework is typical for utility-scale Li-ion systems. Although module leaks are very unlikely, any material that might leak to the floor of the container will easily be contained within the modular unit(s). The BESS will be manufactured, assembled, and inspected off-site and will be shipped to the site as outdoor-rated prefabricated enclosures, which will be installed and electrically connected on-site. The BESS enclosures will also require concrete foundations made of steel reinforcing bars and concrete (gravel, sand, cement, and water). Consequently, the primary raw materials needed for the Solar Components' construction are rock, gravel, sand, water, cement, and steel rebar.

Although some new materials will be required for the proposed BESS as compared to the Existing Facility, the materials used to construct the BESS and associated infrastructure are typical materials used for the construction of these facilities and are materials that the Council has already approved for other energy facilities.

Table G-1 provides a list of industrial materials that will be used during Solar Components construction, based on current engineering estimates. The amount of water used for concrete is discussed in Exhibit O. Solid waste generated and flowing out of the Solar Components during construction is outlined in Exhibit W.

**Table G-1. Materials Inventory for Construction**

Material	Quantity/Units	Ultimate Disposition
Solar modules	Maximum 264,836 modules	Throughout each solar module string
Steel solar module tracker posts	32,621 posts, 3,425 tons steel (210 pounds per post)	Throughout each solar module string
Solar modules per string	26 modules per one-string rack, 52 modules per two-string rack, and 104 per 4-string rack (max 8,872 strings)	Throughout each solar module string
Aggregate (rock and gravel)	88,511 tons total	See below by location
• Battery storage	7,000 tons (5 acres)	On-site graveled area
• Access roads	67,816 tons (10.5 miles new road)	On-site graveled area
• Substation	3,445 tons (3 acres)	On-site graveled area

Material	Quantity/Units	Ultimate Disposition
• O&M Building/Structures	3,250 tons (1.5 acres)	On-site graveled area
• Temporary construction areas	7,000 tons (6 acres)	On-site graveled area
Concrete	34,570 cubic yards (yd <sup>3</sup> ) total	See below by location
• Battery storage	18,000 yd <sup>3</sup> (126 blocks; pier foundations will not require any concrete)	Foundation
• Substation	510 yd <sup>3</sup> (2.5 acres)	Foundation
• O&M Building/Structures	13,000 yd <sup>3</sup> ( 0.016 acres storage containers [4 total], 0.04 acres office trailers [1 total], 0.02 acres control buildings [1 total])	Foundation
• Transmission line (230-kV) support structures	60 yd <sup>3</sup> (4 poles)	Foundation
Battery components	126 enclosures)	BESS
Batteries	126 enclosures	BESS
Centralized trunk bus system	1 system (aboveground aluminum trunk system)	Aboveground within the solar array
Substation generator step-up transformer	1 transformer	Within the substation footprint
Collector lines (34.5 kilovolt [kV])	52 miles (underground)	Between solar array and substations, underground only
Transmission line (230-kV)	Approximately 600 feet	Interconnecting the collector substations to existing substation
Transmission line (230-kV) support structures	Approximately 4 poles	Aboveground structures
Inverter/Transformers	Solar: 33 inverters and transformers BESS: 153 inverters and 39 transformers	Aboveground throughout solar array and BESS
Fencing	75,504 feet total (14.3 miles)	Will remain around solar arrays, substations, and BESS
Fuel	Diesel: 1,200 gallons/week (approx. 4,800 gallons/month)	Temporary aboveground tanks within the temporary construction areas (three 1,000-gallon tanks; See Division 27)

## 2.2 Operations

No substantial quantities of industrial materials will be brought into or removed from the Facility during the operation of the Solar Components. The materials that will be brought into or removed during operations are those needed for maintenance or replacement of damaged equipment (e.g., solar array components, electrical equipment) and will be delivered to the Solar Components as needed.

Transformer oils will be present within the Solar Components but will be fully contained within the electrical transformers. Fuel or oils needed for maintenance will be delivered by a licensed maintenance contractor on an as-needed basis, and no substantial quantities will be stored on-site.

During the Solar Components' lifetime, major maintenance issues may require the replacement of solar modules or other associated components; however, due to the unpredictable nature of major maintenance problems, no estimate has been provided for the number of major components that may be needed. Minor maintenance may also require the replacement and removal of smaller components, which are not expected to constitute substantial amounts of industrial materials.

Batteries may require periodic replacement if a component is found to be faulty; otherwise, the batteries are not expected to be replaced during the life of the Solar Components. Modules lose their effectiveness through repeated charge/discharge cycles. The BESS will require augmentation to compensate for degradation. Augmentation will add additional batteries to maintain a 125-MW output, but degraded batteries would not be removed from service. For this analysis, it is assumed that batteries are only removed due to needed repair or replacement during operations, and replacement of batteries for degradation would only happen at decommissioning. Due to the unpredictable nature of needed repair or replacement, no estimate has been provided for the number of batteries that will flow into and out of the Solar Components.

Table G-2 lists the cumulative materials and amounts used for O&M of the Solar Components.

**Table G-2. Materials Inventory for Operations**

<b>Material</b>	<b>Quantity/Units</b>	<b>Ultimate Disposition</b>
Spare solar modules	1,324 modules (0.5% of proposed modules)	Stored at the proposed O&M Buildings/Structures
Transformer oil	Substation generator step-up transformer: 10,000 – 15,000 gallons Solar array inverter step-up transformers: approximately 700 gallons each BESS inverter step-up transformers: approximately 700 gallons each	Within transformer boxes for cooling (No extra oil stored outside of transformers. Additional oil only required due to failure, provided on an as-needed basis)

### **3.0 Hazardous Materials Handling and Management – OAR 345-021-0010(1)(g)(B)**

*OAR 345-021-0010(1)(g)(B) The applicant's plans to manage hazardous substances during construction and operation, including measures to prevent and contain spills; and*

**Response:** During the construction or operations phases of the Solar Components, it may be necessary to use minor quantities of hazardous substances. In compliance with Site Certificate Condition 80, all potentially hazardous substances will be sorted, handled, and disposed of in a manner that is protective of human health, safety, and the environment and that complies with all applicable local, state, and federal environmental laws and regulations. Additionally, proposed Site



Certificate Condition 130 requires the Certificate Holder to implement a Hazardous Materials Management and Monitoring Plan to address the storage, handling, and disposal of potentially hazardous substances (as defined by Oregon Revised Statute 465.200; see Division 27 document).

Extremely hazardous substances in excess of threshold planning quantities, highly toxic substances, or explosive materials will not be necessary to support either the construction or the operations phase of the Solar Components. Additionally, materials used during construction and operations will be selected so that they minimize the potential for producing “hazardous waste,” as defined by the Resource Conservation and Recovery Act. Accidental releases of hazardous materials will be prevented or minimized through proper containment of these substances during use and transportation to the Solar Components as described in the Spill Prevention, Control, and Countermeasure Plan (SPCC) Plan, per proposed Site Certificate Condition 131 (see Division 27 document). Spills will be reported and mitigated according to Site Certificate Condition 81.

### **3.1 Construction**

During construction of the Solar Components, small quantities of potentially hazardous materials may be used including cleaners, insecticides or herbicides, paint, solvents, and spent vehicle and equipment fluids and components (e.g., used oil, used hydraulic fluids, spent fluids, oily rags, and spent lead-acid or nickel-cadmium batteries). Potentially hazardous substances will not be permanently present within the construction areas in quantities that exceed Oregon State Fire Marshal Reportable Quantities.<sup>2</sup>

Fuels will be the only hazardous material that may be stored in substantial quantities on-site during construction. The Certificate Holder anticipates that at least three 1,000-gallon diesel fuel tanks total (two diesel and one gasoline) may be kept on-site for fueling of construction equipment, or up to 3,000 gallons total. These will be stored in temporary aboveground tanks in the temporary construction area(s), within an area that provides for secondary containment. It is anticipated that each diesel tank will be filled once per month or as needed. Secondary containment and refueling procedures for on-site fuel storage will follow the contractor’s Hazardous Materials Management and Monitoring Plan (per proposed Site Certificate Condition 130). Secondary containment will comply with 40 Code of Federal Regulations (CFR) §112.7(c), which requires secondary containment for all aboveground, buried, and partially buried containers. It is anticipated that the majority of fuel containers will have self-contained secondary containment (e.g., double-walled containers) that provide capacity for the entire container plus precipitation, but in some cases smaller containers (e.g., drums) will be placed in a constructed secondary containment area that is impervious and is diked or otherwise contained to provide the required fuel and precipitation capacity.

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<sup>2</sup> “Reportable quantity” refers to the amount of hazardous substance that has to be released into the environment before the U.S. Environmental Protection Agency requires notification of the release to the National Response Center pursuant to the Comprehensive Environmental Release, Compensation, and Liability Act, also known as Superfund. These numerical designations are listed under 49 CFR 172.101 Appendix A, Table 1 and Table 2.

Construction-based equipment will be regularly inspected to detect potential leaks or other issues that may require maintenance. Potentially hazardous substances related to the maintenance of the construction equipment will only be brought to the construction site by a maintenance technician on an as-needed basis, and any unused or waste substances will be removed during the same service call. Refueling will take place a substantial distance from waterways or wetlands to prevent water quality impacts in the event of an accidental release.

As required by Site Certificate Condition 84, the Certificate Holder will implement a Construction Waste Management Plan for the Solar Components. The plan will include measures to segregate all hazardous and universal wastes such as used oil, oily rags, mercury-containing lights, and lead-acid and nickel-cadmium batteries for disposal by a licensed firm that specializes in their proper recycling/disposal.

Additionally, as required by proposed Site Certificate Condition 130, a Hazardous Materials Management and Monitoring Plan will be implemented for the Solar Components. The SPCC Plan will address spill prevention, and the Hazardous Materials Management and Monitoring Plan will address hazardous substances specifically. The Hazardous Materials Management and Monitoring Plan shall include operating procedures to prevent hazardous substances releases, control measures to contain hazardous substance releases, countermeasures to contain, cleanup, and mitigate hazardous substance releases, and procedures for required inspections and testing. The SPCC Plan will outline preventative measures and practices to reduce the likelihood of an accidental release of a hazardous or regulated liquid and, in the event such a release occurs, to expedite the response to and remediation of the release. If any inspection performed in accordance with the Hazardous Materials Management and Monitoring Plan identifies improper handling or storage of hazardous substances (as defined by Oregon Revised Statute 465.200) or improper record-keeping procedures, the Certificate Holder must correct such deficiencies promptly and must report the corrective actions.

In the event that an accidental spill occurs, the Certificate Holder will ensure the spill is mitigated according to applicable regulations and, if the spill is reportable (e.g., 42 gallons or impacts to waters of the state; ODEQ 2024), the Certificate Holder will report the spill within 72 hours (per Site Certificate Condition 81) and take appropriate remedial action. Consistent with Site Certificate Condition 81, spill kits with absorbent pads will be located on equipment and storage facilities to respond to accidental spills and will instruct employees on the proper handling, storage and cleanup of hazardous materials. Any reportable spills will be immediately called in to the Oregon Emergency Management Division's Oregon Emergency Response System, per OAR Chapter 340 Division 142. See Exhibit CC for a listing of applicable regulations.

### **3.2 Operations**

The Solar Components will not include substantial quantities of fuels, lubricating oils, hydraulic fluid for construction equipment, or other hazardous materials maintained on-site during operations. Small quantities of a few hazardous materials may be utilized; such materials may include cleaners, insecticides or herbicides, paint, or solvents. The Solar Components will not

require a significant increase in use of these items, and none will be present in substantial reportable quantities. When not in use, these items will be stored in a secure location within the proposed O&M building/structures. In compliance with Site Certificate Condition 87, an Operational Waste Management Plan will be implemented for management of both hazardous and non-hazardous waste during operations.

The BESS may include hazardous substances within internal battery components; however, batteries are integrated to safely operate when used according to the recommendations of the manufacturer and when their integrity is maintained (not damaged and internal seal is intact). Li-ion batteries specifically present a flammability hazard and require cooling systems to prevent overheating. The BESS will have integrated safety systems that monitor battery performance to detect malfunctions and implement response measures. Batteries will be housed in leak-proof enclosures to prevent inadvertent releases of hazardous materials. O&M staff will conduct inspections of the BESS for damage. Li-ion batteries may contain hazardous waste and will be handled and disposed of per the most up-to-date guidelines at the end of their life.

For the replacement of Li-ion batteries specifically, the Certificate Holder will follow the handling guidelines of 49 CFR 173.185 (Department of Transportation Pipeline and Hazardous Material Administration) related to the shipment of Li-ion batteries. The regulations include requirements for prevention of a dangerous evolution of heat, prevention of short circuits, and prevention of damage to the terminals. They also require that no battery will come into contact with other batteries or conductive materials. A licensed third-party battery supplier will transport batteries to and from the Proposed Facility in accordance with applicable regulations. Spent batteries will be disposed of at a facility permitted to handle them in compliance with applicable Resource Conservation and Recovery Act and Toxic Substances Control Act regulations administered by the U.S. Environmental Protection Agency or Oregon Department of Environmental Quality. Adherence to the requirements and regulations (including personnel training, safe interim storage, and segregation from other potential waste streams) will minimize safety hazards related to transport, use, or disposal of batteries.

Additionally, as proposed by Site Certificate Conditions 130 and 131, an operational Hazardous Materials Management and Monitoring Plan and SPCC Plan will be implemented. In the unlikely event of an accidental hazardous materials release, any spill or release will be cleaned up and the contaminated soil or other materials disposed of and treated according to applicable regulations. Employees at the Solar Components will be trained to be aware of the potential hazards through the availability of Safety Data Sheets, and to handle such releases in accordance with applicable regulations. See Exhibit CC for a list of applicable regulations. Spill kits containing items such as absorbent pads will be located on equipment and in on-site storage facilities to respond to accidental spills, if any were to occur (per Site Certificate Condition 81). Employees handling hazardous materials will be instructed in the proper handling and storage of these materials, as well as where spill kits are located. The Certificate Holder will report spills or releases of hazardous materials during construction or operation as noted above to the Oregon Emergency Response

System, per reporting requirements detailed in OAR Chapter 340 Division 142 and Site Certificate Condition 81.

## **4.0 Non-Hazardous Waste Management – OAR 345-021-0010(1)(g)(C)**

*OAR 345-021-0010(1)(g)(C) The applicant's plans to manage non-hazardous waste materials during construction and operation.*

Response: The Certificate Holder will continue to fully comply with all applicable waste handling and disposal regulations on all lands associated with the Solar Components, during both its construction and operation. Solid waste will be stored in a manner that does not constitute a fire, health, or safety hazard until such time as it can be hauled off for recycling or disposal, as appropriate. Exhibit W provides details on the types and amounts of waste, and procedures and systems for the handling and disposal of waste materials.

### **4.1 Construction**

Construction of the Solar Components will generate the same types of nonhazardous solid and liquid waste as the Existing Facility, which the Certificate Holder will manage according to the Construction Waste Management Plan (Site Certificate Condition 84). Waste construction materials generated from construction may include scrap steel, wood, concrete waste, excavated soil, and packaging material waste. When feasible, the waste generated during construction will be recycled. Steel scraps will be separated and recycled to the extent feasible. Wood from concrete forms will be reused when practicable and then recycled. Excess excavated material will be used to restore ground contours after construction, and to provide fill on-site or be transported off-site for disposal. Construction will not require the use of specialized structures, systems, or equipment for waste management or disposal. Standard construction waste bins will be kept on-site to keep construction debris until it is hauled off-site by a licensed waste hauler (see Exhibit U for waste service provider information). Further information regarding waste materials is included in Exhibit W.

The only material that has the potential to be disposed of on-site will be waste concrete generated during construction. Waste concrete will consist of concrete solids contained in the concrete chute washout water. Washdown methods will be determined by the contractor and may occur at off-site contractor-owned batch plants, within each foundation excavation and/or a designated concrete washout area (per Site Certificate Condition 86). Any excess concrete may be incorporated into foundations, or crushed and disposed of as construction waste at an appropriate location on-site with permission from the landowner, otherwise, excess concrete will be disposed of at a licensed landfill (per Site Certificate Condition 85).

Packaging waste (such as paper and cardboard) and refuse will be separated, accumulated in dumpsters, and periodically removed for recycling or disposal at the Wasco County Landfill or Columbia Ridge Landfill (see Exhibit U). In compliance with Site Certificate Condition 82, portable

toilets will be provided for on-site sewage handling during construction and will be pumped and cleaned regularly by the construction contractor.

Construction stormwater will be generated at the location of the solar array and battery energy storage construction sites. Such stormwater will be covered under the Solar Components' National Pollutant Discharge Elimination System 1200-C construction permit and its associated Erosion and Sediment Control Plan consistent with Site Certificate Condition 26. The draft Erosion and Sediment Control Plan for the Solar Components is included as Attachment I-1 to Exhibit I.

## **4.2 Operations**

Waste generated by operation of the Proposed Facility will be negligible. Operation of the Solar Components will generate the similar types of nonhazardous solid and liquid waste as previously approved for the Existing Facility, which the Certificate Holder will manage according to the Operational Waste Management Plan (Site Certificate Condition 87). The Operational Waste Management Plan will include handling procedures for lithium-ion batteries (addressed in Section 3.2 above).

Administrative activities related to the Solar Components will be conducted at the proposed O&M buildings/structures. Office waste generated at the proposed O&M buildings/structures will be disposed of at the Wasco County Landfill or Columbia Ridge Landfill. The O&M office trailers, specifically, will include potable water and a sewer connection for toilets. The sanitary sewer will be collected and treated by a new septic system sufficient for all planned full-time staff during operation (in compliance with Site Certificate Condition 83). An On-Site Septic Permit would be obtained from the North Central Public Health District, which regulates the installation, repair, and maintenance of septic systems in Sherman County.

Solar panels will be washed, but no chemicals will be mixed with the wash water. Wash water will either evaporate or will infiltrate into the ground near the point of use, consistent with Site Certificate Condition 88 (see Exhibit W). The solar panel wash water will be sourced from the City of Wasco, or other permitted water sources as needed. No additional industrial wastewater streams will be generated by the Solar Components.

## **5.0 References**

ODEQ (Oregon Department of Environmental Quality). 2024. When to report a spill. Accessed December 2024. <https://www.oregon.gov/deq/hazards-and-cleanup/er/pages/how-to-report-a-spill.aspx>.