

Exhibit W

Generation of Solid Waste and Wastewater

**Sunstone Solar Project
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Prepared for



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Acronyms and Abbreviations

Applicant	Sunstone Solar, LLC, a subsidiary of Pine Gate Renewables, LLC
BMP	best management practice
ESCP	Erosion and Sediment Control Plan
EPA	U.S. Environmental Protection Agency
Facility	Sunstone Solar Project
Li-ion	lithium-ion
NPDES	National Pollutant Discharge Elimination System
O&M	operations and maintenance
OAR	Oregon Administrative Rule
ODEQ	Oregon Department of Environmental Quality

1.0 Introduction

Sunstone Solar, LLC, a subsidiary of Pine Gate Renewables, LLC (Applicant), proposes to construct and operate the Sunstone Solar Project (Facility), a solar energy generation facility and related or supporting facilities in Morrow County, Oregon. This Exhibit W was prepared to meet the submittal requirements in Oregon Administrative Rule (OAR) 345-021-0010(1)(w).

2.0 Major Types of Waste Produced with Quantity Estimates

OAR 345-021-0010(1)(w) Information about the applicant's plans to minimize the generation of solid waste and wastewater and to recycle or reuse solid waste and wastewater, providing evidence to support a finding by the Council as required by OAR 345-022-0120. The applicant must include:

(A) A description of the major types of solid waste and wastewater that construction, operation and retirement of the facility are likely to generate, including an estimate of the amount of solid waste and wastewater;

To address the Waste Minimization standard, this exhibit describes the Applicant's plan to minimize the generation of solid waste and wastewater during construction, operation, and decommissioning of Facility components. The types of solid waste and wastewater generated during Facility construction, operations, and decommissioning, as well as the procedures and practices used to handle these materials, are discussed in the following sections.

2.1 Solid Waste

The following sections identify the types and quantities of solid waste anticipated to be generated throughout the Facility. During construction and operation, the Applicant will coordinate with its solid waste handler to provide the information solicited through the Oregon Department of Environmental Quality's (ODEQ) Recycling Collector Survey to the Morrow County Wasteshed representative on an annual basis.

2.1.1 Construction

Solid waste produced from construction will include discarded construction materials, packaging materials, and spent erosion control materials. Wood form work used for cast-in-place foundations for the substations, inverter/transformer pads, operations and maintenance (O&M) pads, and battery pads will be discarded. Concrete for transmission line posts, if used, will have no associated concrete wood form work. Other discarded construction materials could include scrap metal from damaged pilings or racking equipment, or unused wiring. Solar photovoltaic modules, battery parts, and associated electrical equipment will be delivered to the site in cardboard and plastic packaging, along with wood pallets. This packaging will be recycled to the extent practicable and disposed of

off-site. Erosion control material (e.g., straw wattles, silt fencing) will be removed following site stabilization and disposed of at a landfill, as these materials are typically nonrecyclable.

Access road construction and grading are expected to produce negligible amounts of dirt and rock spoils that will need disposal, because cut and fill measures are expected to balance the need for and use of soils. Excavations for the solar array foundations, support structures, and the collector substations are not expected to produce significant amounts of dirt and rock spoils. These materials will be spread over areas previously disturbed during construction. Materials will only be spread as appropriate, with adequate measures for soil conservation and erosion and sediment control, as required by the Erosion and Sediment Control Plan (ESCP). A copy of the draft ESCP is included as an attachment to Exhibit I. When it is not appropriate to spread materials over previously disturbed areas, materials will be hauled to appropriate disposal sites on participating landowner property; the location of such sites will be determined on an as-needed basis during construction. If off-site soil disposal is necessary, the contractors disposing of the material will obtain a signed agreement with the party receiving the earth materials and will confirm that the disposal sites have been inspected as to not disturb sensitive environmental resources.

The nonhazardous waste produced during construction will be managed by a local solid waste hauler. Estimated volume of construction solid waste will total approximately 800 cubic yards per phase (six phases total, inclusive of overlapping phases, as applicable; see Exhibit B for further details on construction schedule) during active construction. Each individual phase is estimated to span 21 months, and the total Facility construction duration is estimated to be complete within approximately 47 months. Overall, the solid waste types and quantities from construction are typical of any large-scale construction project, and the total amount of construction solid waste across all phases is estimated at approximately 14,400 cubic yards. To accommodate solid waste produced during construction, two large dumpsters (40 tons each) will be required every other day during active module installation; otherwise, two dumpsters per week before and after solar installation will be required.

2.1.2 Operations

An insignificant amount of solid waste is expected to be generated during the operation and maintenance of the Facility. This waste may include equipment and components that are replaced, packing materials for replacement components, and waste typical of a small office employing up to 40 people. Office waste, such as paper and food packaging and scraps, will be generated at the O&M buildings. It is estimated that no more than 3 cubic yards of solid waste will be produced weekly during operations, to be disposed of at the Finley Butte Landfill. The waste will be handled consistent with the Morrow County Solid Waste Management Ordinance.

Repair or replacement of solar array and associated electrical equipment could generate incidental solid waste. However, a solar array typically lasts more than 30 years without significant degradation in function and panels will be replaced infrequently, if at all. The Applicant estimates that, using a replacement rate of 0.13 percent annually, an estimated 5,118 modules will be replaced

each year, which is estimated to produce 550 cubic yards of module waste per month. Therefore, operation of the solar array will not result in a significant amount of solid waste.

The battery energy storage system may also generate incidental waste from repair or replacement of electrical equipment. The battery energy storage system will require regular replacement of batteries as they degrade over time. These batteries will be replenished at a rate dependent on usage. For example, a battery that is cycled more often will degrade faster than one that is used less often. For this analysis, it is assumed that the battery will be fully discharged each day and the useful life of the battery will be 20 years requiring likely replacement after year 20. This assumption likely overestimates the number of batteries that will be replaced over the life of the Facility, because not all batteries will be replaced during each replenishment cycle (e.g., fewer batteries will need replacing early in the Facility life).

For the replacement of lithium-ion (Li-ion) batteries (if selected) during operation, the Applicant will follow the handling guidelines of 49 Code of Federal Regulations 173.185 – Department of Transportation Pipeline and Hazardous Material Administration related to the shipment of Li-ion batteries. Licensed third-party battery suppliers will be responsible for transporting batteries to and from the Facility in accordance with applicable regulations, as required through their licensure. 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 (EPA) or the ODEQ. Note that used 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.

2.1.3 Decommissioning

The anticipated working lifespan of the Facility is 40 years, after which time the Facility may be extended, repowered, or decommissioned. Facility decommissioning is discussed in greater detail in Exhibit X. When the Facility is decommissioned, and the site restored to a useful, non-hazardous condition for other planned uses, the amount of solid waste can be inferred from the materials inventory provided in Exhibit G. At the time of decommissioning, the components as well as other aboveground equipment will be disassembled and the materials will be recycled or reused, sold for scrap, or taken to a landfill. Such components and equipment include the solar photovoltaic modules, steel mounting racks, posts, and trackers; and associated support structures; inverters, transformers, and battery energy storage modules; concrete and aggregate used for foundations and road construction; the substations; the O&M buildings; and transmission line, poles, and other associated structures. As an alternative to demolition, the landowner may opt to use the Facility's O&M buildings for agricultural purposes. Internal roads, fences, and gates will be removed and the area revegetated unless otherwise requested or agreed to by the landowner. Ancillary components, such as the buried collector line, concrete pads, and gravel, will be removed to a minimum depth of 3 feet below grade but left in place below that point. To allow for agricultural activities, concrete foundations will be removed, recycled, and replaced by suitable clean fill.

The decommissioning of the battery energy storage system will involve disposing of battery components at an off-site facility designed and approved for disposal or recycling of batteries by licensed third-party battery suppliers, who will be responsible for transporting batteries to and from the Facility in accordance with applicable regulations, as required through their licensure. The batteries will be disposed of at the time of decommissioning in the same manner described above for operational replacement. Ancillary components of the battery energy storage system will also be removed in a manner similar to the methodology of the other concrete pads.

2.2 Wastewater

Wastewater generated by the Facility will include construction wastewater consisting of sanitary wastewater, equipment washwater and concrete washout water, and operational wastewater produced at the O&M buildings and from washing solar panels. This section discusses how each of these types of wastewater will be handled throughout the life of the Facility.

2.2.1 Construction

Sanitation during construction activities will be addressed through the provision of portable toilets located throughout the Facility construction area at locations that will be determined by the construction contractor prior to and during construction. Portable toilets will be provided by a licensed subcontractor, who will be responsible for servicing the toilets at regular intervals and disposing of wastewater in accordance with local jurisdictional regulations. The construction contractor will ensure that a sufficient number of toilets are provided, and that the licensed subcontractor complies with applicable regulations, including the use of holding tanks for biological waste that conform to OAR 340-071 and transportation of waste in accordance with Oregon Revised Statutes 466.005. Small amounts of wastewater will be generated from washdown of concrete trucks after concrete loads have been emptied. Concrete truck chutes will be washed down at each foundation site to prevent the concrete from hardening within the chutes. Washdown methods will be determined by the contractor and may occur at contractor-owned batch plants or a designated concrete washout.

During construction of the Facility, the Applicant will ensure that no water used for construction will be discharged into wetlands, streams, or other waterways. The Applicant will implement erosion control measures required by its National Pollutant Discharge Elimination System (NPDES) Construction Stormwater Discharge General Permit 1200-C and its associated ESCP to control stormwater runoff (see Exhibit I for further information).

2.2.2 Operations

During operations, the on-site septic systems within the O&M buildings will be licensed, constructed, and maintained in compliance with state permit requirements and will have a discharge capacity of less than 2,500 gallons per day.

Operational wastewater sources will also include maintenance activities associated with the solar array. There may be periodic washing of the solar modules to minimize the effects of dust and dirt on energy production which will be dependent on weather conditions (e.g., during drought conditions when there is more dust the panels may require washing). The water used for array cleaning is not anticipated to require off-site disposal due to the extremely high evaporation rate and expected infiltration at the site. Any washwater will likely evaporate before it could be collected for transport off-site. Therefore, washwater will be evaporated or infiltrated into the ground. The Applicant will ensure that there is no runoff of washwater from the site or discharges to surface waters, storm sewers, or dry wells. No acids, bases, or metal brighteners will be used in the washwater and biodegradable, phosphate-free cleaners may be used sparingly.

2.2.3 Decommissioning

Wastewater will be generated during decommissioning of the solar arrays and supporting facilities including electrical systems, roads, and buildings similar to the generation of wastewater during construction. The number of on-site workers, and generation and handling of sanitary wastewater, will be comparable to construction. New concrete will not be required during decommissioning, and therefore concrete washwater will not be generated. Facility decommissioning is discussed in greater detail in Exhibit X.

3.0 Structures, Systems, and Equipment to Manage and Dispose of Waste

OAR 345-021-0010(1)(w)(B) A description of any structures, systems and equipment for management and disposal of solid waste, wastewater and storm water;

3.1 Construction

Construction will not add any new types or significant quantities of waste as compared to similar construction projects in the vicinity, and as a result, no new structures, systems, or equipment will be needed to manage and dispose of construction wastes. Standard construction waste bins will be kept on-site to keep construction debris until it is hauled off-site. Separate containers for small quantities of hazardous materials, such as oily rags or contained soil from minor spills, will be provided according to the contractor's Spill Prevention, Control, and Countermeasure Plan. Wastewater and stormwater will be managed through measures and best management practices (BMPs) outlined in the ESCP.

Generation of waste from construction will be minimized through detailed estimating of materials needs and through efficient construction BMPs. As noted earlier, materials will be recycled as feasible. The Applicant will comply with the Morrow County Solid Waste Management Ordinance Section 5.000 as discussed in the following sections.

3.2 Operation

As described above, the Facility will generate electricity without producing significant solid waste, wastewater, or stormwater. The Facility is designed to operate without replacement parts, but some repair or replacement of electrical, solar, or battery equipment is expected over the life of the Facility. Damaged equipment and other solid waste will be collected by the maintenance crews, removed, and transported to off-site to facilities such as Finley Butte Landfill that handle the disposal or recycling of these items. Operational waste will be handled according to the Morrow County Solid Waste Management Ordinance Sections 5.020 and 5.030.

Waste from the O&M buildings and other solid waste generated at the Facility will be collected and recycled as practicable. Non-recyclable wastes will be collected and transported to a local landfill. Disposal of materials for routine maintenance and housekeeping, such as lubrication oils and cleaning supplies, will be managed according to the pertinent BMPs, regulations, and the guidelines outlined in Exhibit G.

Self-contained battery components and spent batteries will be removed and disposed of or recycled by a license vendor in compliance with applicable Resource Conservation and Recovery Act and Toxic Substances Control Act regulations administered by the EPA or ODEQ. The batteries will be handled by a licensed third-party battery supplier in accordance with applicable regulations, as required through their licensure. Additionally, waste hauling by facility personnel within Morrow County will be performed in compliance with Morrow County Solid Waste Management Ordinance Section 5.000 Public Responsibilities and 5.030 Responsibility for Proper Disposal of Hazardous Waste.

Battery containers will require periodic replacement because the modules lose their effectiveness through repeated charge/discharge cycles. The frequency of replacement will depend on operational parameters that are not yet fully designed, but for purposes of this analysis, it is conservatively assumed that all batteries will need to be replaced every 20 years, or once over the life of the Facility (40 years). The following procedures are anticipated to be implemented for battery replacement:

- The Facility operator will disconnect and de-energize the battery system prior to removal from the installed racks, and package the batteries for transport to an approved facility.
- At the recycling facility, the qualified contractor will dismantle battery modules and prepare individual cells for metals recovery.
- Individual cells will be processed in a furnace to recover metals. Recovered metals may include aluminum, calcium, lithium, and a metal alloy comprising cobalt, copper, nickel, and iron.
- Recovered metals will be recycled or separated to recover individual metals where economically viable.

Some washing of solar panels will be conducted (see Exhibit O). The limited quantity of washwater will evaporate or will infiltrate into the ground near the point of use. No additional industrial

wastewater streams will be generated during operation of the solar array. No additional structures, systems, or equipment are required for stormwater resulting from the addition of the solar arrays.

The Facility will increase the impervious area within the watershed with the installation of the battery energy storage containers, collector substations, O&M buildings, inverter/transformer stations, and transmission line concrete foundations for supporting the solar array. The increase in impervious area will not likely result in a significant amount of additional stormwater runoff during operations.

3.3 Decommissioning

Waste produced from decommissioning activities will be managed in a similar manner to the waste produced during construction and operations (see Sections 2.1 and 2.2 above). To the extent practicable, Facility components will be sold for reuse or scrap, which will minimize the amount of waste requiring disposal at a solid waste facility. As noted above, the landowner may opt to use the Facility's O&M buildings for agricultural purposes. Similar BMPs to those used in the construction and operations phases will be implemented to protect stormwater quality.

The solar array will be removed and recycled or disposed of at Facility decommissioning. At the expected Facility life span of 40 years, an available solar array could still be capable of generating 80 to 85 percent of its initial capacity, in which case the solar panels could be repurposed for use at other locations. Decommissioning of the Facility is described in Exhibit X. If continued reuse is not practical, the array will be dismantled and recycled to reclaim constituent parts, such as glass, aluminum, silicon solar cells, and metals.

The battery energy storage system will require disposal of the container structures housing the batteries and their constituent parts. The batteries will be disposed of at decommissioning in the same manner described above for operational replacement. Electrical systems and associated equipment will be disposed of as incidental waste and will be collected and recycled, as feasible. Non-recyclable wastes will be collected and transported to the Finley Butte Landfill.

3.4 Solid Waste Disposal Site

The incorporated communities near the Facility will provide solid waste management services to their respective incorporated areas. Solid waste disposal for the Facility will be provided through a private contract with local commercial haulers. Solid waste generated by the Facility will ultimately be disposed of at the Finley Butte Landfill in Morrow County. See Exhibit U for further discussion of landfills. Correspondence with the Finley Butte Sales Manager (see Exhibit U attachments) confirms that the Finley Butte Landfill has adequate capacity to handle the projected waste generated by construction, operation, and decommissioning of the Facility. During construction and operation, the Applicant will coordinate with its solid waste handler to provide the information solicited through ODEQ's Recycling Collector Survey to the Morrow County Wasteshed representative on an annual basis. The Applicant will provide information to the Morrow County Wasteshed on the amounts and types of wastes sent to landfill or recycling, as required by the Morrow County Solid

Waste Management Ordinance. The Morrow County Wasteshed will benefit through the reporting of recyclable disposal.

4.0 Water Use Reduction

OAR 345-021-0010(1)(w)(C) A discussion of any actions or restrictions proposed by the applicant to reduce consumptive water use during construction and operation of the facility;

Minimizing use of water for the Facility will be an important environmental consideration as the Facility moves into the construction phase. The Applicant will use appropriate BMPs to reduce water use to the greatest extent feasible; solar energy facility construction by its nature does not afford the construction contractor significant opportunities for reducing water use. Water will be used on an as-needed basis to construct concrete foundations and pads, suppress dust on the roads (and other areas disturbed by grading), and wash out concrete truck chutes. To reduce the water used for dust suppression, stabilization materials such as mulch, or soil tackifiers and binders such as magnesium chloride, may be used to lengthen the interval between necessary dust control water applications, if such additives are permitted by landowners and applicable regulations.

Additionally, weather and soil conditions will be regularly monitored to minimize watering the construction roads while maintaining regulatory compliance for fugitive dust issues. Water for dust control will not be applied if weather conditions are such that disturbed soils will remain sufficiently damp and fugitive dust will not be created. Additionally, other dust suppressants besides water may be utilized as necessary during extreme drought conditions (synthetic polymer emulsions, chemical suppressants, organic glues, and wood fiber materials) depending on the site and condition (to be applied by trained and certified vendors familiar with applicable environmental regulations including federal, state, and local regulations).

During operations, water used for solar panel washing will be limited to the minimum necessary for effective panel function. No additional water use, and therefore no additional actions to limit water use, will result from installation of the battery energy storage system. Water will be trucked to the Facility and held in a water tank or obtained from an on-site well. The water used at the O&M buildings will meet building code requirements for water conservation practices.

5.0 Plans for Recycling and Reuse

OAR 345-021-0010(1)(w)(D) The applicant's plans to minimize, recycle or reuse the solid waste and wastewater described in (A);

Waste generated during construction will be minimized through implementation of efficient construction practices and detailed estimates of material needed. Waste generated during each phase of the Facility will be recycled as practicable. Typical recycled waste includes metals, glass, paper, wood, and concrete. Damaged solar modules or used batteries may be returned to the manufacturer for recycling or reuse. When recycling is not feasible, the materials will be sorted and

stored in dumpsters or other suitable containers, and transported by a licensed waste hauler to an approved disposal location where necessary. Licensed waste haulers must comply with OAR 340-093-0220 for transportation of wastes as well as the Morrow County Solid Waste Management Ordinance. Employees will be trained to minimize and recycle solid waste. Water used for solar panel washing during operations will be discharged for infiltration into the ground near the point of use, but will not be discharged into wetlands, streams, or other waterways.

At the time of decommissioning, the Applicant will attempt to reuse the Facility's components including collector substations and transmission line for another use. However, it is difficult to forecast the future energy materials and infrastructure needs; therefore, it is uncertain if the Facility collector substations and transmission line will be reused.

6.0 Impacts of Project Waste

6.1 Description of Impacts

OAR 345-021-0010(1)(w)(E) A description of any adverse impact on surrounding and adjacent areas from the accumulation, storage, disposal and transportation of solid waste, wastewater and stormwater during construction and operation of the facility;

The Facility will not generate significant quantities of solid waste, wastewater, or stormwater during construction and operation, and no adverse impacts on surrounding or adjacent areas are anticipated. Waste will be removed from the site and reused or recycled, or, when necessary, disposed of at permitted disposal facilities. Any waste disposed of on-site (e.g., concrete waste and wastewater) will be inert, disposed of in a manner consistent with applicable regulations, and protective of human health and the environment.

Wastewater will be collected and treated using an on-site septic tank and drain field during operation of the Facility. Therefore, no aboveground accumulation or transportation of this waste will be needed. During construction, portable toilets will be serviced regularly. As necessary, wastewater generated during construction will be transported by a local contractor via tank trucks to a treatment facility. Water used for dust suppression will percolate into the ground.

Stormwater generated on-site during construction and operation is expected to be minimal. Stormwater controls will be implemented on-site as needed in accordance with the NPDES Construction Stormwater Discharge General Permit 1200-C and associated ESCP. During operations, the stormwater will infiltrate into the ground.

6.2 Evidence that Impacts are Minimal

OAR 345-021-0010(1)(w)(F) Evidence that adverse impacts described in (D) are likely to be minimal, taking into account any measures the applicant proposes to avoid, reduce or otherwise mitigate the impacts; and

See Section 6.1 for a description of the reasons why no adverse impacts on surrounding and adjacent areas from solid waste, wastewater, and stormwater are expected during construction and operation of the Facility. Further evidence is provided in Section 2, which describes the predominately low quantities of solid waste and wastewater for a commercial project of this proportion, particularly as the Facility will not create wastes directly from electricity generation. Disposal and waste reduction methods are described above in Sections 3, 4, and 5. All proposed waste management practices are protective of human health and the environment and consistent with applicable regulations. Given this evidence, there will be no or minimal impacts from Facility-generated waste.

7.0 Monitoring Program

OAR 345-021-0010(1)(w)(G) The applicant's proposed monitoring program, if any, for minimization of solid waste and wastewater impacts.

The Applicant will monitor construction stormwater impacts in accordance with a NPDES Construction Stormwater Discharge General Permit 1200-C to be issued by the ODEQ, and an associated ESCP (see Exhibit I for additional detail on construction stormwater management and the application for a 1200-C permit). The ESCP describes BMPs for erosion and sediment control, spill prevention and response procedures, proper disposal procedures, regular maintenance for vehicles and equipment, and employee training on spill prevention.

No significant impacts from solid waste and wastewater are expected from construction and operation of the Facility. Therefore, no monitoring program aside from the ESCP is proposed.

8.0 Submittal Requirements and Approval Standards

8.1 Submittal Requirements

Table W-1. Submittal Requirements Matrix

Requirement	Location
OAR 345-021-0010(1)(w) Information about the applicant's plans to minimize the generation of solid waste and wastewater and to recycle or reuse solid waste and wastewater, providing evidence to support a finding by the Council as required by OAR 345-022-0120. The applicant must include:	-
(A) A description of the major types of solid waste and wastewater that construction, operation and retirement of the facility are likely to generate, including an estimate of the amount of solid waste and wastewater;	Section 2.0
(B) A description of any structures, systems and equipment for management and disposal of solid waste, wastewater and storm water;	Section 3.0
(C) A discussion of any actions or restrictions proposed by the applicant to reduce consumptive water use during construction and operation of the facility;	Section 4.0

Requirement	Location
(D) The applicant's plans to minimize, recycle or reuse the solid waste and wastewater described in (A);	Section 5.0
(E) A description of any adverse impact on surrounding and adjacent areas from the accumulation, storage, disposal and transportation of solid waste, wastewater and stormwater during construction and operation of the facility;	Section 6.1
(F) Evidence that adverse impacts described in (D) are likely to be minimal, taking into account any measures the applicant proposes to avoid, reduce or otherwise mitigate the impacts; and	Section 6.2
(G) The applicant's proposed monitoring program, if any, for minimization of solid waste and wastewater impacts.	Section 7.0

8.2 Approval Standards

Table W-2. Approval Standard

Requirement	Location
OAR 345-022-0120 Waste Minimization	
(1) Except for facilities described in sections (2) and (3), to issue a site certificate, the Council must find that, to the extent reasonably practicable:	-
(a) The applicant's solid waste and wastewater plans are likely to minimize generation of solid waste and wastewater in the construction and operation of the facility, and when solid waste or wastewater is generated, to result in recycling and reuse of such wastes;	Sections 2.0 through 7.0
(b) The applicant's plans to manage the accumulation, storage, disposal and transportation of waste generated by the construction and operation of the facility are likely to result in minimal adverse impact on surrounding and adjacent areas.	Sections 2.0 through 7.0
(2) The Council may issue a site certificate for a facility that would produce power from wind, solar or geothermal energy without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.	Sections 2.0 through 7.0
(3) The Council may issue a site certificate for a special criteria facility under OAR 345-015-0310 without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.	N/A