

Preliminary Application for Site Certificate for the Speedway Energy Facility

Exhibit N. Waste Minimization

**Submitted to
Oregon Energy Facility Siting Council**

Prepared for



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July 2026

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
Applicant	BGTF Speedway Project LLC
BESS	battery energy storage system
BMP	best management practice
ESCP	Erosion and Sediment Control Plan
Facility	Speedway Energy Facility
Li-ion	lithium-ion
LLC	limited liability company
NPDES	National Pollutant Discharge Elimination System
O&M	operations and maintenance
OAR	Oregon Administrative Rules
ODEQ	Oregon Department of Environmental Quality

1.0 Introduction

BGTF Speedway Project LLC (Applicant) proposes construction and operation of the Speedway Energy Facility (Facility), a renewable energy facility incorporating wind, solar, and battery energy storage, located on privately owned land in unincorporated Sherman County, Oregon. The Facility's proposed point of interconnection to the regional electrical grid will be via a new Bonneville Power Administration (BPA) switchyard to be located adjacent to the existing BPA 500-kilovolt Ashe-Marion Transmission Line, which runs northeast/southwest through the site boundary.

Exhibit N presents information supporting demonstration of compliance with the approval standard in Oregon Administrative Rules (OAR) 345-022-0120.

2.0 Description of Facility Solid Waste and Wastewater – OAR 345-022-0120(4)(a)(A)

(4) To assist the Council in determining whether the standard outlined in (1) through (3) has been met, the Applicant must submit:

(a) 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;

2.1 Solid Waste

This section identifies the types of solid waste anticipated to be generated throughout the Facility's lifespan, and the estimated quantities of such waste.

2.1.1 Construction

Construction of the Facility will generate a small amount of non-hazardous solid waste. Solid waste generated during construction is anticipated to include scrap metal (e.g., wire and rebar scraps), wood, concrete, concrete washout, and other debris. Much of this waste will be packing material such as crates, pallets, and paper wrapping to protect equipment during shipping. It is estimated that Facility construction will produce approximately 50,000 cubic yards of waste.

Access road construction and grading are expected to produce negligible amounts of dirt and rock spoils that will need disposal, since cut and fill measures are expected to balance the need for and use of soils.

The excavation of turbine foundations and installation of solar array tracker posts is expected to produce dirt and rock spoils that will require disposal due to the volume of dirt and rock produced. These materials will be spread over areas previously disturbed during construction. Materials will only be spread as appropriate, resulting in no appreciable grade change and with adequate measures for soil conservation and erosion and sediment control (see Exhibit C – Soil Protection). 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.

Some concrete waste will be created from construction of Facility turbines, solar array tracker posts, inverters/transformer foundations, substations, battery energy storage system (BESS), and operations and maintenance (O&M) buildings. 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.

2.1.2 Operations

An insignificant amount of non-hazardous 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 fewer than 20 people, such as paper, food packaging, and scraps. The non-hazardous waste generated during operation of the Facility will be disposed of by a licensed commercial waste hauler.

Waste generated from repair or replacement of wind turbines will primarily consist of replacement of wind turbine blades. Wind turbine blades have a typical lifespan of 20 to 30 years, so blades will be replaced infrequently, if at all. Turbine blades will be recycled, if practicable, or will be disposed of by a licensed commercial waste hauler.

Repair or replacement of solar modules 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. Therefore, operation of the solar arrays will not result in a significant amount of solid waste.

The BESS may also generate incidental waste from repair or replacement of electrical equipment. Throughout the Facility's lifetime, the BESS will require periodic augmentation and the addition of battery units to supplement capacity lost due to degradation, but removal and replacement of units – and therefore generation of waste – will occur infrequently, if at all.

2.1.3 Decommissioning

The anticipated working lifespan of the Facility is 30 years, after which time the Facility may be extended, repowered, or decommissioned. Facility decommissioning is discussed in greater detail in Exhibit F – Retirement and Financial Assurance. Should the Facility be decommissioned, the amount of solid waste can be inferred from the materials inventory provided in Section 5.3 of the

Background Information Exhibit. Upon decommissioning, the site will be restored to a useful, non-hazardous condition for other planned uses. All turbine components and towers would be removed, all aboveground electrical components would be removed, and concrete foundations would be cut and removed to a minimum depth of 3 feet below ground. Underground cables would typically be left in place, as removing them would cause unnecessary habitat disturbance. Metals and electrical components are expected to be recycled as scrap rather than disposed of in a landfill wherever possible. The portions of concrete foundations that are removed would be disposed of as construction waste. Transformers and other substation equipment would be removed to be reconditioned for use elsewhere or recycled as scrap metal. The O&M buildings would be demolished and disposed of in an appropriate facility or converted for agricultural uses. None of these materials are considered hazardous. Waste that cannot be recycled or sold for reuse will be disposed of at the Columbia Ridge Landfill or other licensed facility identified at the time of decommissioning.

The decommissioning of the BESS 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. BESS foundations 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. Additional information on water use and wastewater is provided in Exhibit O2 – Water Use.

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.

Most of the wastewater generated during construction will be concrete washout water produced during the construction of turbine and substation foundations. Concrete washout water typically

makes up 25 percent of the total water used for concrete in foundations. 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 Facility construction, 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 Erosion and Sediment Control Plan (ESCP) to control stormwater runoff (see Exhibit C for further information).

2.2.2 Operations

Minimal wastewater will be generated during operations. Wastewater from domestic and incidental uses at the O&M buildings (less than 5,000 gallons per day) will be discharged to county-approved septic systems located near the O&M buildings or stored in tanks and disposed of in accordance with applicable codes.

Operations wastewater sources will also include maintenance activities associated with the solar arrays. 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.

2.2.3 Decommissioning

Wastewater generated during decommissioning will be similar to that described above for construction, with the exception of wastewater generated from concrete washout. 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. Activities will be covered by a general NPDES 1200-C stormwater permit.

3.0 Description of Waste Management and Disposal Infrastructure – OAR 345-022-0120(4)(a)(B)

(B) A description of any structures, systems and equipment for management and disposal of solid waste, wastewater and storm water;

3.1 Construction

Construction staging yards, turbine pads, substations, and site access roads will be kept in an orderly condition throughout the construction period. Waste generated during Facility construction will be temporarily collected at each construction site (e.g., at each turbine location) and then consolidated into larger disposal containers at the construction yards. Disposal and recycling containers will be labeled by waste type to segregate materials as appropriate for recycling or disposal.

Disposal and recycling containers will be of adequate size, design, and number to handle the amount of waste being generated. Roll-off shipping containers will be used to collect scrap metal, wood, and paper products, and other recyclable materials. All waste containers will be fitted with lids to prevent waste from being scattered by the wind.

Solid waste generated during construction will be hauled away for recycling or disposal, as appropriate. Paper products and other materials, such as batteries, glass, metals, and plastic, will be recycled when practicable. As disposal and recycling containers reach capacity, they will be removed to disposal facilities that can handle these materials, and the containers will be replaced with empty units. Removal of the waste to appropriate disposal facilities will be done by a licensed waste hauler, under contract to the construction contractor. Licensed waste haulers must comply with OAR 340-093-0220 for transportation of wastes.

Soil and rock materials from foundation excavations will be spread within the temporary disturbance areas during construction or removed from the excavation site as soon as practicable. Most excess spoils generated during road cut and fill excavation activities will be incorporated into Facility grading activities as fill material. Excess spoils will be a very small amount, and any excess spoils from excavation of the foundations will be spread out around the foundations. Disturbed soil and rock materials will be contained using appropriate best management practices (BMPs) to prevent sediment from being released to areas outside the construction boundary, especially wetlands and other waters that may be in the vicinity. The construction contractor will arrange off-site disposal of excess soils if this should be necessary.

The Applicant and its construction contractor will create a plan for how solid waste materials during construction activities will be reused, recycled, or disposed. That plan will specify items such as the following: the number and types of waste containers to be maintained at construction sites and construction yards, how waste is to be segregated for recycling or disposal, the names and locations of appropriate recycling and waste disposal facilities, collection requirements, and hauling requirements.

Sanitation during construction activities will be addressed through the provision of portable toilets. Other types of wastewater generated during construction will be allowed to evaporate and infiltrate into the ground. Stormwater will be managed using BMPs in accordance with the terms of the NPDES 1200-C stormwater permit.

3.2 Operations

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, wind, 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 the Columbia Ridge Landfill, which has confirmed that it has sufficient capacity to accommodate the Facility's solid waste needs (see Exhibit L – Public Services).

Waste from the O&M buildings and other solid waste generated at the Facility will be collected and recycled as practicable. Non-recyclable waste 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 the Background Information Exhibit.

Self-contained battery components and spent batteries will be removed and disposed of or recycled by a licensed vendor in compliance with applicable Resource Conservation and Recovery Act and Toxic Substances Control Act regulations administered by the U.S. Environmental Protection Agency or the Oregon Department of Environmental Quality (ODEQ). The batteries will be handled by a licensed third-party battery supplier in accordance with applicable regulations, as required through their licensure.

For the replacement of batteries 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 or the ODEQ. 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. The following procedures are anticipated to be implemented for battery replacement:

- The Facility operator will disconnect and de-energize the BESS 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.

Washing of solar panels may be conducted (see Exhibit O2). 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 arrays. No additional structures, systems, or equipment are required for stormwater resulting from the addition of the solar arrays.

The Facility will slightly increase the impervious area within the watershed with the installation of the turbine foundations, BESS containers, collector substations, O&M buildings, and inverter/transformer stations. The increase in impervious area is very limited in relation to the entire site footprint and 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 3.1 and 3.2 above). Metals and electrical components are expected to be recycled as scrap rather than disposed of in a landfill wherever possible. The portions of concrete foundations that are removed would be disposed of as construction waste. Transformers and other substation equipment would be removed to be reconditioned for use elsewhere or recycled as scrap metal. The O&M buildings would be demolished and disposed of in an appropriate facility or converted for agricultural uses. None of these materials are considered hazardous. Waste that cannot be recycled or sold for reuse will be disposed of at the Columbia Ridge Landfill or other licensed facility identified at the time of decommissioning.

The BESS 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 waste will be collected and transported to the Columbia Ridge Landfill or other licensed facility identified at the time of decommissioning. Decommissioning activities are discussed in greater detail in Exhibit F.

4.0 Actions or Restrictions of Consumptive Water Use – OAR 345-022-0120(4)(a)(C)

(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 it moves into the construction phase. The Applicant will use appropriate BMPs to reduce water use to the greatest extent feasible. Wind and solar facility construction by 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. Water will be used in areas of active construction or vehicle movement as needed for dust control. To reduce the water used for dust suppression, stabilization materials such as mulch may be used to lengthen the interval between necessary dust control water applications. Weather and soil conditions will be regularly monitored to minimize watering 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.

If conducted, water used for solar panel washing will be limited to the minimum necessary for effective panel function. Operation of the Facility does not require additional consumptive water use, except for minimal amounts at the O&M buildings similar in nature to typical office use (see Exhibit O2). The water used at the O&M buildings will meet building code requirements for water conservation practices. Blade washing is not anticipated to occur; it has been found to be unnecessary in most environments, does not enhance turbine performance, and is generally not recommended by turbine manufacturers. No additional water use, and therefore no additional actions to limit water use, will result from installation of the BESS.

5.0 Minimization and Recycling Plans – OAR 345-022-0120(4)(a)(D)

(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 materials 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. 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.

6.0 Waste-Related Impacts

6.1 Description of Impacts – OAR 345-022-0120(4)(a)(E)

(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.

Water will be used primarily for dust control, concrete mixing, concrete washout, and periodic solar panel washing. None of these activities will produce wastewater that will affect area streams, wetlands, or groundwater supplies. Sanitary waste during construction will be handled by a licensed contractor according to applicable regulations. Sanitary wastes during operation of the Facility will be safely handled by a permitted and properly designed on-site septic system at the O&M buildings or stored in tanks and disposed of in accordance with applicable codes. The Facility will not generate industrial wastewater or effluent. Water used for dust suppression or panel washing will evaporate or 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 a 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 Will Be Minimal – OAR 345-022-0120(4)(a)(F)

(F) Evidence that adverse impacts described in (E) 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 waste 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.

6.3 Monitoring Program – OAR 345-022-0120(4)(a)(G)

(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 1200-C construction stormwater permit issued by ODEQ, and an associated ESCP (see Exhibit C). 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. Waste management activities will be subject to periodic inspections to ensure compliance with applicable regulations.

7.0 Materials Analysis – OAR 345-022-0120(4)(b)

(b) A materials analysis, including:

(A) An inventory of substantial quantities of industrial materials flowing into and out of the proposed facility during construction and operation;

(B) The applicant's plans to manage hazardous substances during construction and operation, including measures to prevent and contain spills; and

(C) The applicant's plans to manage non-hazardous waste materials during construction and operation.

The materials analysis for the Facility can be found in Section 5.3 of the Background Information Exhibit.

8.0 Conclusion

The evidence provided above demonstrates that the Oregon Energy Facility Siting Council's Waste Minimization Standard (OAR 345-022-0120) is met because waste generated due to construction, operation, and maintenance of the Facility will be minimized, reused, or recycled where feasible, and because minimal or no adverse impacts on the surrounding or adjacent areas will result from the management of waste related to the Facility.

9.0 Approval Standards and Submittal Requirements

Table N-1. Approval Standards and Submittal Requirements

Requirements	Location
OAR 345-022-0120 Waste Minimization	–
Approval Standards	
(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;	This exhibit/Section 8.0
(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 6.1/8.0
(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.	–
(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.	–
Submittal Requirements	
(4) To assist the Council in determining whether the standard outlined in (1) through (3) has been met, the Applicant must submit:	–
(a) 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
(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

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Requirements	Location
(F) Evidence that adverse impacts described in (E) 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 6.3
(b) A materials analysis, including:	Section 5.3 of the Background Information Exhibit
(A) An inventory of substantial quantities of industrial materials flowing into and out of the proposed facility during construction and operation;	Section 5.3 of the Background Information Exhibit
(B) The applicant's plans to manage hazardous substances during construction and operation, including measures to prevent and contain spills; and	Section 5.3 of the Background Information Exhibit
(C) The applicant's plans to manage non-hazardous waste materials during construction and operation.	Section 5.3 of the Background Information Exhibit
EFSC 2-2025, amend filed 04/02/2025, effective 04/02/2025	