Waste Minimization Exhibit

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REFERENCE
Oregon Energy Facility Siting Council

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ACRONYMS AND ABBREVIATIONS

Acronym	Description
Applicant	DECH bn, LLC
BESS	Battery energy storage system
Facility	Solar photovoltaic power generation facility and related or supporting facilities in Wasco County, Oregon
O&M	operations and maintenance
OAR	Oregon Administrative Rules

1. INTRODUCTION

DECH bn, LLC (Applicant) plans to construct a solar photovoltaic power generation facility and related or supporting facilities in Wasco County, Oregon (Facility). The Facility will include up to 1,000 megawatts of solar capacity and a battery energy storage system (BESS) with up to 4,000 megawatt hours storage capacity. This Waste Minimization Exhibit has been prepared to meet the requirements in OAR 345-022-0120.

2. MAJOR TYPES OF WASTE PRODUCED WITH QUANTITY ESTIMATES

OAR 345-022-0120(4)(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

2.1.1 CONSTRUCTION

The Facility construction will generate several waste streams including equipment packaging (e.g., cardboard, plastic, metal parts and wooden pallets), discarded wooden forms from concrete foundations, temporary erosion control devices, general domestic-type waste generated by the construction workforce, and damaged materials (e.g., damaged/broken solar photovoltaic panels, metals, and wiring if any components are delivered damaged). A significant amount of packaging waste will be recycled and reused, though erosion control materials typically require landfill disposal after use.

Facility construction is estimated to generate a total of 40,000 cubic yards of solid waste, with a significant portion of this being recyclable materials. Construction waste generation will be concentrated during the equipment delivery and installation periods, typically occurring for over 18 to 24 months. These waste volumes are comparable to, or less than, other industrial projects of a similar size.

Local waste management contractors will handle waste collection throughout construction. This will likely require several large-capacity containers placed on-site temporarily during construction to be serviced weekly. Construction waste will be segregated with dedicated recycling receptacles to reduce landfill impact.

Earthwork during construction will follow balanced cut-and-fill approaches and no earth material waste is anticipated. Developing access roads, grading, and excavating structure foundations will generate limited spoils, which will be redistributed across previously disturbed areas. Soil redistributed during construction will be managed consistently with the Construction Vegetation and Soil Management Plan, provided as Attachment 2 in the Soil Protection Exhibit.

2.1.2 OPERATIONS

Facility operation will generate minimal solid waste, mostly from the operations and maintenance (O&M) building, consisting of typical office waste such as packaging and food related wastes. Waste will be collected and processed at local disposal and recycling facilities in accordance with county solid waste ordinances.

Operational waste generation will be spread out over the life of the Facility. A significant portion of this waste will be recyclable materials. The estimated solid waste generation during Facility operation is approximately 60 cubic yards annually from O&M operation. Equipment maintenance activities will generate minimal waste. The solar array itself will produce negligible waste during operation, as these systems typically function for decades without significant degradation, resulting in infrequent replacement needs throughout the Facility's lifespan. Maintenance of the BESS will require periodic (i.e., approximately every 4 years) augmentation to adjust for standard changes in the capacity of existing units. This includes the installation of additional BESS enclosures while maintaining existing equipment; some equipment packaging waste will be generated when augmentation units are installed.

Approximately 60 cubic yards of solid waste will be generated from each BESS augmentation, which is expected to occur approximately every 4 years (i.e., years 4, 8, 12, 16, and 20), totaling 300 cubic yards over the lifetime of the Facility.

2.1.3 DECOMMISSIONING

When the Facility reaches end-of-life, aboveground equipment and structures will be disassembled, with materials either recycled, reused, sold as scrap, or transported to appropriate landfills.

The total decommissioning waste volume is estimated at 80 cubic yards of light construction material, with approximately 65 percent potentially recyclable or reusable materials, particularly metals, glass, and certain electronic components.

Information and analysis on the decommissioning process, estimated useful life of the Facility, major components, sequencing, transportation, and estimated costs can be found in the Retirement and Financial Assurance Exhibit.

2.2 WASTEWATER

2.2.1 CONSTRUCTION

During construction, wastewater will be generated from sanitation facilities and from equipment and concrete washout activities. Sanitation requirements during Facility construction will be met through strategic placement of portable toilets throughout the construction area. A licensed subcontractor will provide these toilets, with specific locations determined by the construction contractor based on work patterns and site layout. This subcontractor will be responsible for regular servicing of the toilets and proper disposal of collected wastewater in compliance with local regulations. The construction contractor will ensure adequate toilet facilities are available, and that the subcontractor adheres to applicable regulations.

Construction activities will generate minimal wastewater, primarily from equipment and concrete truck wash operations after deliveries. Equipment washout will be used to avoid transporting dust from the Facility onto public roadways, and resulting washout water will either evaporate or infiltrate into the ground. Concrete truck chutes require cleaning at each foundation site to prevent hardening of materials within the equipment. This will only be required where concrete is used; additional information about anticipated concrete volumes is provided in the Soil Protection Exhibit. The specific wash methods will be determined by the contractor at designated concrete washout stations, though it is expected that the contractor will practice recovery or recycling techniques to minimize water use. Concrete washout water typically goes through a simple treatment to separate suspended solids. The remaining water then evaporates or is pumped into adjacent basins for evaporation. When the concrete silt solids are dried out, they will be transported off-site for disposal.

The Applicant will ensure that no construction water is discharged into wetlands, streams, or other waterways. Stormwater management will follow strict protocols outlined in the Construction Stormwater Discharge General Permit 1200-C and its associated Erosion and Sediment Control Plan[1] to control stormwater runoff.

Total construction phase wastewater generation is projected at approximately 2.3 million gallons across the construction timeline, which includes sanitary wastewater and water associated with equipment and concrete washing activities. Refer to the State and Local Laws and Regulations Exhibit for further analysis regarding water usage during construction.

2.2.2 OPERATIONS

Water usage for Facility operations will be minimal; most water required for Facility operation will be for sanitation at the O&M building and for periodic solar panel washing. Waste water from the O&M building will be managed by an on-site septic system, licensed and constructed in compliance with state permit requirements.

The solar panels will be washed periodically to help minimize the negative effects of dust and dirt accumulation on energy production efficiency. Panels will be washed approximately once per year, though the washing frequency will depend on local environmental conditions, with increased washing potentially required during drought periods when dust accumulation is greater. As described in the State and Local Laws and Regulations Exhibit, panel washing will require approximately 432,120 gallons of water per event. A third-party contractor that washes the solar panels may seek coverage under the Water Pollution Control Facilities-1700-B permit from Oregon Department of Environmental Quality if washing activities will result in discharge to surface waters. However, it is expected that wash water will either evaporate or infiltrate into the ground, and that solar panel washing will not produce wastewater requiring off-site disposal. If such a permit is required, the contractor will initiate an application following the completion of construction and before initiating any washing activities.

[1] 2022 Construction General Permit (CGP) | US EPA

2.2.3 DECOMMISSIONING

The primary type of wastewater generated during Facility decommissioning will be sanitary wastewater, which will be managed following similar protocols to those established during construction, with portable toilets provided for workers and serviced by licensed contractors in accordance with applicable regulations.

During decommissioning, workers will generate approximately 5 gallons of sanitary wastewater a day per worker, and approximately 892,500 gallons across the decommissioning timeline. Sanitation requirements will be met with portable toilets placed throughout the decommissioning area.

Refer to the Retirement and Financial Assurance Exhibit for further analysis regarding the decommissioning of the Facility.

3. STRUCTURES, SYSTEMS, AND EQUIPMENT TO MANAGE AND DISPOSE OF WASTE

OAR 345-022-0120(4)(a)(B) A description of any structures, systems and equipment for management and disposal of solid waste, wastewater and storm water;

3.1 CONSTRUCTION

Standard waste management practices will be implemented during Facility construction. No specialized equipment or infrastructure is required beyond what is typically used in construction.

Construction debris will be collected in standard roll-off dumpsters until transported for disposal or recycling. Transportation impacts will be minimized by scheduling waste removal during off-peak hours whenever feasible and utilizing established truck routes. Unless there is a major, unexpected road closure, all Facility truck traffic, regardless of point of origin, will follow the primary access route which avoids highways with higher traffic volumes related to Mount Hood and surrounding attractions. Additional analysis of vehicle traffic is provided in the Public Services Exhibit. Designated containers will be provided separately for hazardous materials like oily rags or soil from minor spills, following the contractor's Spill Prevention, Control, and Countermeasure Plan.

For wastewater and stormwater handling, the Facility will employ conventional industry-standard best management practices as detailed in the contractor’s Erosion and Sediment Control Plan. The construction team will accurately estimate materials required for construction to minimize waste generation, and waste materials will be recycled where possible to reduce landfill impact.

All waste handling during construction will adhere to local regulations, including Wasco County Solid Waste Collection and Disposal Ordinances. This approach uses standard industry practices without requiring any specialized waste management systems or structures.

3.2 OPERATION

During operation, the Facility will produce electricity with minimal waste generation, eliminating the need for specialized waste management infrastructure. Over the Facility's operational lifespan, some electrical components, solar panels, and battery elements will need repair, replacement, or augmentation, generating periodic waste.

Standard collection methods will handle regular waste from the O&M building, with recyclable materials separated when feasible. Maintenance supplies, including cleaning products and lubrication oils, will be managed according to regulatory guidelines and best management practices as outlined in Facility documentation.

Periodic solar panel washing will create minimal wastewater that will either evaporate or infiltrate into the ground near the panels, requiring no additional management structures. While the installation of various components (buildings, foundations, substations, battery containers) increases impervious surface area, the resulting stormwater increase will be negligible and will require only standard design considerations rather than specialized management systems.

3.3 DECOMMISSIONING

During decommissioning, components will be reused or sold as scrap, where possible, to minimize the amount of waste requiring disposal in solid waste facilities. If reuse proves impractical, the components will be dismantled to reclaim valuable constituent materials including aluminum, glass, metals, and silicon solar cells. Electrical equipment and associated systems will be managed as incidental waste, collected and recycled where feasible. Any non-recyclable materials (e.g., steel and reinforced concrete) will be collected and assessed for potential reuse and repurposing. Recycling or reusing materials will be prioritized whenever feasible; any remaining construction materials that cannot be recycled or reused will be transported to the Wasco County Landfill for disposal.

The decommissioning process will implement best management practices like those used during construction and operations to ensure stormwater quality protection.

Refer to the Retirement and Financial Assurance Exhibit for further analysis regarding the decommissioning of the Facility.

3.4 SOLID WASTE DISPOSAL SITE

All solid waste generated by the Facility during construction will be assessed for responsible end of life disposal methods including recycling and reuse. Waste materials that cannot be recycled or reused will be collected and transported to the Wasco County Landfill in The Dalles for final disposal. Correspondence provided as Attachment 4 of the Public Services Exhibit confirms that the Wasco County Landfill has sufficient capacity to accommodate waste generated throughout construction, operation, and decommissioning phases.

The Applicant will work with their solid waste handler during construction and operation to provide information requested through the Oregon Department of Environmental Quality's Recycling Collector Survey to the Wasco County Wasteshed representative annually. As required by the

Wasco County Solid Waste Collection and Disposal Ordinances, the Applicant will report to the Wasco County Wasteshed regarding the types and quantities of waste sent for landfill disposal or recycling.

4. WATER USE REDUCTION

OAR 345-022-0120(4)(a)(C) A discussion of any actions or restrictions proposed by the applicant to reduce consumptive water use during construction and operation of the facility;

While Facility construction requires water, the Applicant will deploy strategic best management practices to limit water consumption wherever feasible. During construction, water will be required for concrete work, dust control, road compaction, and sanitation. To reduce the water needed for dust control, stabilization materials like soil binders, may be used to reduce watering frequency, subject to landowner approval and regulatory compliance. Additionally, construction personnel will conduct regular weather and soil monitoring, so that water is only applied for dust control when needed. If there are severe drought conditions, alternative suppressants might be utilized—ranging from polymer emulsions to wood fiber materials—applied by qualified vendors knowledgeable in relevant environmental regulations.

During operation, panel washing will only be conducted as needed, likely once a year, and will use the minimal water necessary for optimal panel performance. Additionally, advancements in solar panel cleaning technology may reduce the water needs for solar panel washing in the future.

Refer to the State and Local Laws and Regulations Exhibit for further analysis regarding water usage during construction and operation.

5. PLANS FOR RECYCLING AND REUSE

OAR 345-022-0120(4)(a)(D) The applicant's plans to minimize, recycle or reuse the solid waste and wastewater described in (A);

The Applicant will implement comprehensive measures to minimize, recycle, and reuse solid waste and wastewater across the Facility's lifecycle. During construction, precise material estimation and strict waste segregation protocols will maximize recycling opportunities while reducing excess. Operationally, a preventative maintenance program will extend component lifespan, with thorough evaluation for potential refurbishment before recycling or disposal[2]. When specialized components require replacement, partnerships with certified recycling and collection facilities will ensure proper handling and material recovery, particularly for battery systems[3] and solar panels. In particular, much of the weight of solar panel components can use existing recycling supply chains for glass, aluminum, copper, and plastic[4]. To manage waste responsibly, the Applicant will work with vendors and suppliers that have an end-of-life waste management contract in place and will

[2] Best Practices for Operation and Maintenance of Photovoltaic and Energy Storage Systems; 3rd Edition
[3] Lithium-Ion Battery Recycling | US EPA
[4] Solar Panel Recycling | US EPA

comply with Hazardous Waste Regulations applicable to the selected technologies, which may be in flux until late in the design and development process.

Water conservation will be prioritized through low-flow fixtures in Facility buildings and efficiency-optimized cleaning processes. Panel washing will use specialized equipment that maximizes cleaning effectiveness while minimizing water use. All waste minimization efforts will be documented through comprehensive tracking systems, allowing for continuous improvement while ensuring compliance with applicable regulations.

6. IMPACTS OF PROJECT WASTE

6.1 DESCRIPTION OF IMPACTS

OAR 345-022-0120(4)(a)(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's waste management activities during construction and operation will have no anticipated adverse impacts on surrounding and adjacent areas. During construction, temporary accumulation of solid waste in designated collection areas will be managed with proper containment measures to prevent litter dispersal or leachate issues. Construction debris will be promptly removed by licensed haulers, eliminating prolonged storage concerns. Transportation activities may cause minor, short-term increases in local traffic, but these will be scheduled during normal business hours to minimize disruption to surrounding communities.

Stormwater will be managed during construction and comprehensive erosion and sediment control measures will prevent significant off-site impacts. Construction wastewater will be minimal and managed by the contractor according to regulatory requirements, preventing contamination of nearby water resources. Sanitary wastewater will be managed by a licensed contractor as described in Section 2.2.1. Equipment and concrete wash wastewater will be stored on-site in tanks and, where possible, the contractor will minimize the water required for concrete washing by deploying water recycling and reuse practices. During operations, the Facility will generate negligible solid waste volumes, with regular collection preventing any accumulation issues. Periodic panel washing activities will produce minimal wastewater that will typically evaporate or infiltrate near the point of use without adversely affecting adjacent properties.

Refer to the Public Services Exhibit for further analysis regarding local impacts of the Facility.

6.2 EVIDENCE THAT IMPACTS ARE MINIMAL

OAR 345-022-0120(4)(a)(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

The Applicant will take a comprehensive approach to avoid and mitigate impacts related to Facility waste generation and management. There will be minimal adverse impacts from waste generation and management activities over Facility construction, operation, and decommissioning.

As described in Section 2.1.1 and 2.2.1 construction solid waste generation will first be minimized through actions such as accurately estimating the quantities of materials required for construction and following balanced cut-and-fill practices. Construction waste that is generated will be recycled or reused wherever possible; waste that does require disposal will be properly managed as described further in Section 3.1.

Facility operation will generate very little waste; component replacement will occur infrequently, with maintenance activities generating minimal waste volumes as described in Section 2.1.2. Periodic panel washing will not use any chemicals or detergents and will generate such small quantities of wastewater that off-site migration is highly unlikely as described in Section 2.2.2.

As described in Section 2.1.3 and 3.3, following the end of the Facility's useful life, the Applicant will follow responsible end-of-life management methods for solar PV and battery waste. Additionally, much of the Facility components will be able to be recycled or reused and the Applicant will prioritize recycling or reuse wherever possible.

For stormwater management, the Facility will implement an Erosion and Sediment Control Plan featuring best management practices such as silt fencing, sediment basins, and stabilization measures (where necessary), effectively preventing off-site sediment migration.

The comprehensive approach to waste minimization and management described above provides substantial evidence that adverse impacts to surrounding areas will be minimal throughout the Facility's lifecycle.

6.3 MONITORING PROGRAM

OAR 345-022-0120(4)(A)(G) The applicant's proposed monitoring program, if any, for minimization of solid waste and wastewater impacts.

The Facility does not propose a formal monitoring program specifically for solid waste and wastewater impacts, as standard operational procedures and regulatory compliance mechanisms will provide sufficient oversight. During construction, the general contractor will document waste removal including retaining disposal receipts and recycling records as part of standard project management practices. These records will verify proper waste handling and disposal while identifying opportunities for waste reduction. Construction stormwater management will be monitored through regular site inspections as required by the applicable stormwater permit, with corrective actions implemented promptly if deficiencies are identified.

During operations, Facility personnel will conduct routine visual inspections of waste collection areas, stormwater management features, and panel washing activities as part of standard maintenance protocols. While not constituting a formal monitoring program, these regular inspections will ensure waste management systems function as designed and identify any potential issues before they affect surrounding areas. Additionally, the Facility will comply with all

reporting requirements specified in Wasco County Solid Waste Collection and Disposal Ordinances, providing information on waste volumes and recycling activities to appropriate regulatory agencies. This approach provides appropriate oversight without requiring a dedicated monitoring program.

7. MATERIALS ANALYSIS

OAR 345-022-0120(4)(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.

An inventory of industrial materials flowing into and out of the Facility during construction and operation is provided as Tables 1 (Inventory of Construction Materials) and 2 (Inventory of Operational Materials) of the Soil Protection Exhibit. As described in more detail in Section 2.3 of the Soil Protection Exhibit, all potentially hazardous materials stored on-site during construction and operation will be managed following strict protocols to safeguard human health and the environment. During construction, fuel storage, if required, will be in secondary containment in designated areas within temporary staging areas. Storage protocols and refueling procedures will be established in the contractors' Spill Prevention, Control, and Countermeasure Plan and all vehicle maintenance will occur off-site. During operation, batteries will be housed in purpose-built, leak-proof enclosures (like shipping containers) and will be inspected regularly by O&M personnel. The O&M building will store limited quantities of maintenance materials (e.g., lubricants, degreasers, herbicides). Storage of maintenance materials will follow manufacturer guidelines and the Spill Prevention, Control, and Countermeasure Plan established for Facility operation. Non-hazardous waste will be managed following standard practices (e.g., solid waste will be stored in conventional waste bins that will be serviced by licensed waste haulers); additional details are provided in Section 2.4 of the Soil Protection Exhibit.

The non-hazardous waste management plan prioritizes reuse and recycling, with concrete waste management, on-site soil reuse, and construction waste sorting to minimize landfill disposal. Further materials analysis details are provided in the Soil Protection Exhibit.

8. APPROVAL STANDARDS

The Applicant has satisfied the standards for the Waste Minimization Exhibit outlined in OAR-022-0120. Approval standards are summarized in Table 1.

TABLE 1 APPROVAL STANDARDS MATRIX

Requirement	Location
OAR 345-022-0120(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;	Section 5
(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.	Section 6
(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.	
(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
(B) A description of any structures, systems and equipment for management and disposal of solid waste, wastewater and storm water;	Section 3
(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
(D) The applicant's plans to minimize, recycle or reuse the solid waste and wastewater described in (A);	Section 5
(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

Requirement	Location
(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 6.3
(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.	Section 7

9. REFERENCES

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