



**Decommissioning Plan**

**Miller Road Solar, LLC**

**465 Miller Rd, East Greenbush, NY**

**Decommissioning Plan**

**August 9, 2023**

**1 INTRODUCTION**

Miller Road Solar, LLC is the project owner and will be referred to as “The Project Owner” throughout this document. The Project Owner proposes to develop two solar facilities with a maximum name plate capacity of approximately 4.95 megawatts (MW-AC) and 4.85 megawatts (MW-AC) located on two parcels (167.-4-36 and 167.-4-37) located at 465 Miller Road, East Greenbush, NY 13138.

Its purpose is the generation of electricity and will interconnect to existing electrical distribution lines on Miller Road. The Project is a ground-mounted solar array; the solar panels are mounted on a single-axis tracker racking system that tracks the sun’s path from East to West. The Project conforms to local wetlands, storm water control, zoning regulations and received SHPO approval. The solar array will be connected to a series of string inverters, which are current conversion equipment. The electric power from the inverters will be run via overhead conduit to electric utility interconnect equipment at the edge of the arrays, and from that to the electricity distribution line (i.e., grid) that runs along the street frontage of the property.

The Decommissioning Plan is being submitted to the Town of East Greenbush’s Planning Board and represents a comprehensive description of decommissioning.

The Decommissioning Plan describes how The Project Owner proposes to restore the project location to a clean and safe condition suitable for the likely future use of the land on which it is located. The report provides an overview of all anticipated activities during the decommissioning phase of the project and outlines mitigation measures to address potential negative environmental effects as a result of these activities. It also discusses the restoration of land and water and the management of excess materials and waste.

**2 THE PROPONENT**

Miller Road Solar, LLC is the developer of commercial-scale solar energy projects in the Northeast. The Project Owner endeavors to work closely with all interested stakeholders in their projects including landowners, local communities, the general public, municipalities, government agencies and ministries. The Project Owner’s main objective is to design and construct projects that are environmentally beneficial, technologically efficient, and financially viable.

Contact information for the proponent is as follows:

www.seboardsolar.com 143 West Street, Suite C201, New Milford, CT 06776 (860) 717-2104

# Attachment 13

Full Name of Companies: Miller Road Solar, LLC  
Prime Contact: Bennett Ramsay, Project Manager  
Address: 143 West Street, Suite C201, New Milford, CT 06776  
  
Telephone: (860) 717-2104  
Fax: (866)304-0939  
Email: [bramsay@seboardsolar.com](mailto:bramsay@seboardsolar.com)

Bohler Engineering is the consultant responsible for the preparation of civil engineering and for consultation activities for the development of the Miller Road Installations. The contact at Bohler Engineering is:

Full Name of Company: Bohler Engineering  
Prime Contact: Steve Wilson  
Address: Bohler, 17 Computer Dr W, NY 12205  
Telephone: (518) 438-9900  
Email: [Steven.Wilson@bohlereng.com](mailto:Steven.Wilson@bohlereng.com)

## 3 PROJECT LOCATION

The proposed Solar Facility is located on Miller Road within the Town of East Greenbush, New York as shown in Figure 1.



**Figure 1** shows the proposed location of the site in East Greenbush, New York, highlighted in blue. The project comprises approximately 59.22 acres as part of approximately 198 acres of privately-owned land (to be owned by the proponent).

## **4 DECOMMISSIONING PLAN OVERVIEW**

Decommissioning consists of the removal of facility components, management of excess wastes and materials and the restoration of project location lands and waters, as applicable. The exact procedures for decommissioning of the project will depend upon the future use of the project location (e.g., for an agricultural use decommissioning will involve returning the land to productivity). Activities are expected to take between 5-6 weeks. Potential negative environmental effects from decommissioning of the facility will be mitigated through established measures. These measures include the use of erosion and sediment control measures, maintaining a buffer from natural features, timing decommissioning activities so that they do not interfere with wildlife breeding times, and rapidly establishing a vegetative cover on disturbed areas. The Project Owner's staff and contractors will be made aware of the environmental management commitments contained in these reports to ensure they are implemented.

The Project Owner will restore the project location to its pre-construction condition. All decommissioning and restoration activities will adhere to the requirements of OSHA, NYSDEC, and NYSAGM, and will be in accordance with all applicable federal, state and local permitting. As with the construction phase, a manager responsible for safety will be present on site (generally the contractor's project manager) while decommissioning activities are taking place.

The decommissioning plan is based on current procedures and experience. These procedures may be subject to revision based on new experiences and requirements over time. At the time of decommissioning various options and procedures will be re-evaluated to ensure that decommissioning is safe and beneficial to the environment. Soil erosion and sedimentation control measures, as well as other mitigation measures used during construction will be re-implemented during the decommissioning phase and until the site is stabilized.

### **4.1 DECOMMISSIONING DURING CONSTRUCTION (ABANDONMENT OF PROJECT)**

While not expected and considered to be extremely unlikely, in the event that construction or operation activities cease prior to facility completion, with no expectation of construction restart, the project would be decommissioned in a manner as described in Section 5 of this report. Any installed components will be removed and managed as per Section 5.1 and 5.4 and the site will be restored to its original pre-construction condition as per Section 5.2 and 5.3. Potential negative effects related to construction and decommissioning (e.g., dust and sedimentation or erosion) and appropriate mitigation measures are addressed in the plans for final decommissioning and site restoration as outlined in this document.

### **4.2 DECOMMISSIONING AFTER CEASING OPERATION**

Properly maintained photovoltaic (PV) panels have an expected lifespan of twenty-five (25) years. At the time of decommissioning the installed components will be removed and

reused/recycled, where possible, and the site restored in accordance with the activities discussed in Table 1 and Table 2. As with the steps for decommissioning during construction, mitigation measures will be implemented. All removal of equipment will be done in accordance with applicable regulations.

### 4.3 RESTORATION OF LANDS NEGATIVELY AFFECTED BY THE FACILITY

As with the project’s construction, noise levels during the decommissioning work will increase. Proper steps will be followed to minimize this disturbance, such as working only during daylight hours. Also, as with the project’s construction, road traffic in the area may increase temporarily due to crews and equipment movements. Further details on site restoration are included in Section 5.3.

## 5 DECOMMISSIONING OF THE RENEWABLE ENERGY GENERATION FACILITY

### 5.1 EQUIPMENT DISMANTLING AND REMOVAL

After the facility has been disconnected from the utility power grid and all electrical components have been disconnected within the facility, components will be dismantled and removed as outlined in Table 1. Decommissioning will be undertaken by licensed subcontractors and in coordination with the equipment supplier using similar techniques and equipment as those employed during construction.

**Table 1: Equipment Dismantling and Removal**

Component	Description
PV modules and associated equipment	<ul style="list-style-type: none"> <li>● Disconnect all wiring, cables and electrical interconnections.</li> <li>● Remove PV modules from racks, temporarily store on-site in delineated area before removal.</li> <li>● Dismantle and remove all racks and support structures; temporarily store on-site before removal.</li> </ul>
Inverter units and transformers	<ul style="list-style-type: none"> <li>● Disconnect all electrical equipment;</li> <li>● Remove inverters, transformers, meters, and other electrical components</li> <li>● Recycle off-site by an approved recycler;</li> <li>● Remove all waste.</li> </ul>
Access roads	<ul style="list-style-type: none"> <li>● Consult with Town to determine if access roads should be left in place for their continued use;</li> <li>● If access road is deemed unnecessary, remove access road and restored access</li> </ul>

	road location as near as practical to its original condition with native soils and seeding.
Equipment foundations	<ul style="list-style-type: none"> <li>● The system is proposed as ground mounted. Steel and concrete foundation components will be removed in their entirety.</li> </ul>
Underground cables	<ul style="list-style-type: none"> <li>● Underground electrical lines running between inverters and the substation will be removed in their entirety by pulling and/or trenching.</li> </ul>
Other components	<ul style="list-style-type: none"> <li>● Above ground lines and poles that are not owned by the utility will be removed, along with associated equipment (isolation switches, fuses, metering), disconnecting from utility grid and holes will be filled with clean fill.</li> <li>● Fences and gates will be removed.</li> </ul>

## 5.2 ENVIRONMENTAL EFFECTS

Decommissioning activities, particularly the removal of project components and grading could cause negative environmental effects similar to those of the construction phase. For example, there is the potential for disturbance (erosion/sedimentation/fuel spills) to significant natural features. Mitigation measures similar to those employed during the construction phase of the project will be implemented. These will remain in place until the site is stabilized in order to mitigate erosion and silt/sediment runoff and any potential effects on the significant natural features located adjacent to the project location.

Road traffic will temporarily increase due to the movement of decommissioning crews and equipment. There may be an increase in particulate matter (dust) in adjacent areas during the decommissioning phase. Decommissioning activities will lead to temporary elevated noise levels from heavy machinery and an increase in trips to the project location. Work will be undertaken during daylight hours and conform to all local noise By-laws.

## 5.3 SITE RESTORATION

A detailed description of environmental conditions and natural features at the project location prior to construction is provided in the Full Environmental Assessment Form Part 1 – Project and Setting as part of the Application for Site Plan Approval. Through the decommissioning phase, the project location will be restored to its former condition or to a condition required for the future intended land use. As the project will be submitted to NYSAGM due to existing prime soils on the site, all necessary standards and requirements of theirs will be met.

All project components will be removed as discussed in Table 1. The Project Owner will consult the town at the time of decommissioning to determine whether the access road will either be left as is

or the aggregate and filter fabric will be removed and the area graded to restore terrain profiles. Topsoil will be replaced as necessary. Rehabilitated lands may be seeded with a low-growing native vegetation to help stabilize soil conditions, enhance soil structure and increase soil fertility.

The site will be restored so that the post decommissioning drainage patterns and the quality/quantity of stormwater will be similar to pre-construction conditions. It is not expected that the lands surrounding the facility will require any special remediation since any hazardous materials used on the site will be contained with adequate spill protection.

Prior to abandonment of the site, a land survey will be conducted to ensure that conditions satisfy those set out by the NYSDEC and in any agreements with agencies (e.g., Town Board, Planning Board).

#### **5.4 MANAGING EXCESS MATERIALS AND WASTE**

During the decommissioning phase a variety of excess materials and wastes (listed in Table 2) will be generated. Most of the materials used in a solar facility are reusable or recyclable and some equipment may have manufacturer take-back and recycling requirements. Any remaining materials will be removed and disposed of off-site at an appropriate facility. The Project Owner will maximize recycling and reuse and will work with manufacturers, local subcontractors and waste firms to segregate material to be recycled, reused and/or disposed of.

The Project Owner will be responsible for arranging for the collection and recycling of the PV modules and for minimizing the potential for modules to be discarded in the municipal waste stream. If there is no possibility for reuse, panels will either be returned to the manufacturer for appropriate recycling/disposal or will be transported to a recycling facility where the glass, metal and semiconductor materials will be separated and recycled. Panels will be managed as per best management practices that may be in effect at the time of decommissioning.

**Table 2: Management of Excess Materials and Waste**

<b>Material/Waste</b>	<b>Means of Managing</b>
PV panels	If there is no possibility for reuse, the panels will either be returned to the manufacturer for appropriate recycling/disposal or will be transported to a recycling facility where the glass, metal and semiconductor materials will be separated and recycled. Panels will be managed as per best management practices that may be in effect at the time of decommissioning.
Metal array mounting racks and steel supports	These materials will be recycled offsite at an approved facility.
Transformers and substation components	The substation transformer will be transported offsite for re-use or disposal at an approved facility.
Inverter units	The metal components of the inverters, fans and fixtures will be recycled, where possible.

## Attachment 13

	The step-up transformers will be transported off-site for reuse or disposal at an approved facility
Gravel (or other granular)	It is assumed that the material will be removed from the project location by truck to a location where the aggregate can be processed for salvage. It will then be reused as fill for construction.
Geotextile fabric	It is assumed that during excavation of the aggregate that a large portion of the geotextile will be “picked up” and sorted out of the aggregate at the aggregate reprocessing site. Geotextile fabric that is remaining or large pieces that can be readily removed from the excavation aggregate will be disposed of at an approved disposal facility.
Concrete inverter/transformer foundations	Concrete foundations will be broken down and transported by the contractor to landfill or a recycling facility.
Cables and wiring	Cables and lines will be disconnected and recycled (if possible), or disposed of at an approved facility. Associated electronic equipment (isolation switches, fuses, metering) will also be removed will be sent to either a recycling depot or an approved disposal facility.
<b>Material/Waste</b>	<b>Means of Managing</b>
Fencing	Fencing will be removed and recycled at a metal recycling facility.
Debris	Any remaining debris on the site will be separated into recyclables/wastes and will be transported from the site and managed as appropriate.

Recyclable materials will be transported off-site by truck and managed at appropriate facilities in accordance with federal, state, and local waste management regulations. Residual waste materials for disposal will be removed by a licensed contractor and transported to landfill. It is not anticipated that any waste materials will be left onsite. All underground electrical wiring will be removed from the site along with all concrete foundations. Given that methods of managing wastes and recyclables may change in the future, information in this report will be updated as necessary to conform to future local and state requirements.



## 6 DECOMMISSIONING ESTIMATE

For this proposal, it is assumed that the fencing, electrical cabinetry, solar racks, solar panels, wiring and all other equipment hold no salvage value and therefore are left out of the cost proposal. The cost of decommissioning is the labor to dismantle and load as well as the cost of trucking. The concrete pads will be broken up at the site and hauled to the nearest transfer station.

The primary cost of decommissioning is the labor to dismantle and load as well as the cost of trucking. Proper disposal of all solid or hazardous materials and wastes from the site in accordance with local, State and Federal solid/hazardous waste-disposal regulations. Restoration of the location of The Project to its natural condition, including stabilization and re-vegetation of the site as necessary to minimize erosion and runoff; landscaping consistent with the character of the site and neighborhood may remain.

We estimate that the removal work will take 5-6 weeks to complete. All electrical equipment will be removed from their concrete pads. The electrical equipment will be sold back to the manufacturers or to a recycling facility. The project contains copper, aluminum and other metals that will be recycled. Racking materials and fencing will be pulled from the ground and folded for transport. This estimate assumes the project lifetime is 25 years and an annual escalator of 2.5 percent as the Inflation Adjustment. **The estimated cost of decommissioning the project is \$247,250.00** (see the following table). These tasks and figures are based on NYSERDA's 'Decommissioning Solar Panel Systems' guidelines.

Tasks	Estimated Cost Per MW(NYSERDA Guidelines)	Estimated Total Cost for Project(5MW)
Remove Rack Wiring	\$1,230	\$6,150
Remove Panels	\$1,225	\$6,125
Dismantle Racks	\$6,175	\$30,875
Remove Electrical Equipment	\$925	\$4,625
Breakup and Remove Concrete Pads or Ballasts	\$750	\$3,750
Remove Racks	\$3,900	\$19,500
Remove Cable	\$3,250	\$16,250
Remove Ground Screws and Power Poles	\$6,925	\$34,625
Remove Fence	\$2,475	\$12,375
Grading	\$2,000	\$10,000
Seed Disturbed Areas	\$125	\$625
Truck to Recycling Center	\$1,125	\$5,625
Current Total	\$30,105	\$150,525
Total After 20 Years (2.5% inflation rate)	\$49,450	\$247,250

## 7 DECOMMISSIONING NOTIFICATION

The process for notification of decommissioning activities will be the same as the process for notification of construction activities and non-emergency communications. The Project Owner will provide notifications of decommissioning activities via certified letter to the required parties.

Decommissioning activities may require the notification of stakeholders given the potential for increased noise and traffic volumes at the project location. The local municipality in particular will be notified prior to commencement of any decommissioning activities to discuss the potential for activities to interfere with traffic on local roads or any other municipal services.

Six months prior to decommissioning The Project Owner will update their list of stakeholders and notify, as appropriate, of decommissioning activities. Federal, state and local authorities will be

notified, as needed to discuss the potential approvals required to engage in decommissioning activities. Once the facility has been fully decommissioned, all responders and stakeholders will be notified. This will allow those parties to make the appropriate changes to their own plans and organization.

In the event any subsidiary or successors assume ownership of the Miller Road Installation, the subsidiary or successor also assumes responsibility in fulfilling regulatory requirements as mandated by the federal, state and local government agencies for the decommissioning of the Miller Road Installation. Notification to the Town Board and Planning Board will be provided within sixty (60) days of any such change in ownership.

In the event that the facility has not operated for a continuous period of twelve (12) months where such inactivity is not the result of a casualty, equipment problem, permitting matter, natural disaster, or financial matter that The Project Owner is in good faith attempting to remedy and in the absence of notification by the Project Owner of a designated decommissioning date, this would constitute a cease in operation. The town may verify operation by requesting a production printout from the project Owner at any time or by calling the power utility to ask for the last months production value.

## **8 OTHER APPROVALS**

Well-planned and well-managed renewable energy facilities are not expected to pose environmental risks at the time of decommissioning. The Project Owner will ensure that the decommissioning stage of the project is carried out in accordance with conservation requirements and with the measures and practices described in this report. The Project Owner understands that the Town Board and Planning Board could request any additional information with regards to decommissioning in the future and that the Town Board and Planning Board will use its powers of compliance enforcement, as appropriate, to ensure risks are managed.

Miller Road Solar, LLC is aware that decommissioning activities may also require permits from other government agencies or entities, which are expected to be similar to those required in the construction phase of the project. The Project Owner shall obtain all required permits and approvals prior to commencement of decommissioning activities.

The Decommissioning Plan will be updated as necessary in the future to ensure that changes in available technology and site restoration methods are taken into consideration.

## **9 FAILURE TO DECOMMISSION**

In the event that The Project Owner fails to undertake decommissioning within one (1) year of cease of operations, the Town of East Greenbush shall have the right to undertake decommissioning activities and make a claim against the Decommissioning Assurance. In this event, The Project Owner and Property Owner, if different, shall agree to allow access to the site for the Town's contractors to complete the decommissioning.

Additionally, in the event that the Project Owner fails to decommission the project and the Town undertakes such actions under the terms of this document, then the Project Owner shall

indemnify the Town for expenses reasonably incurred by the Town in connection to the decommissioning, if such expenses exceed the amount of the Decommissioning Assurance.

## **10 FORM OF DECOMMISSIONING ASSURANCE**

Prior to the issuance of the building permit for the Project, the Project Owner shall provide a form of surety bond or a letter of credit to the Town for the amount equal or greater to the decommissioning estimate stated in this document (\$247,250.00). Such surety bond or letter of credit shall be reviewed and approved by the Town prior to the issuance of the building permit. The Decommissioning Assurance shall be in place for the lifetime of the Project.

## **11 CONCLUSIONS**

This Decommissioning Plan has been completed to assist The Project Owner and any subsidiary or successors in fulfilling regulatory requirements as mandated by the federal, state and local government agencies for the decommissioning of the Miller Road Installations. In the event of the abandonment of the proposed facility or in the event that the solar operation ceases, Miller Road Solar, LLC and any subsidiary or successors will adhere to all decommissioning requirements provided in this report, or stipulated by the Town Board and Planning Board, and will ensure that the project location is properly restored to a safe, clean, pre-facility condition. The Miller Road Installations and any ancillary equipment will be conducted in such a manner as to ensure that there will be no significant negative environmental or social effects.