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Document Title:	Chapter 3_Facility Closure_VDPC
Description:	This chapter discusses facility closure. Section 3.1 discusses temporary facility closure, and Section 3.2 discusses permanent facility closure. Section 3.2, Permanent Closure, describes the framework for decommissioning and reclamation for the Project.
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3 Facility Closure

The Vaca Dixon Power Center Project (Project) includes construction of the Vaca Dixon 57 megawatt hour (MWh) battery energy storage system (BESS) facilities installation and the Arges 400 MWh BESS component. The planned Project life of the facilities is expected to be up to 35 years. The Vaca Dixon 57 MWh BESS component is planned to be operational from 2028 to 2062, and the Arges 400 MWh BESS component is planned to be operational from 2029 to 2063. This section discusses potential temporary closure and permanent facility closure.

Facility closure can be temporary or permanent. Temporary closure is defined as a shutdown for a period exceeding the time required for normal maintenance, including battery augmentation with an intent to restart in the future. Causes for temporary closure may include equipment upgrades and repowering the Project or damage to the Project components from earthquake, fire, storm, or other natural acts. Permanent closure is defined as a cessation in operations with no intent to restart operations because of facility age, damage to facilities, economic conditions, or other reasons. Section 3.1 discusses temporary facility closure, and Section 3.2 discusses permanent facility closure.

3.1 Temporary Closure

Over the life of the Project, components would need to be periodically augmented and/or replaced to increase the Project's efficiency by swapping out or adding batteries, and possibly inverters, for efficiency. For these activities, it is assumed that existing foundations and infrastructure would be utilized, and that ground disturbance would be minimal. The Project could be offline for several weeks or months during optimization activities but would subsequently continue delivering electricity to the electrical grid via the existing PG&E Vaca-Dixon Substation for many decades.

For a temporary closure where there is no release of hazardous materials, such as in the case of repowering/augmentation, the Project would maintain security of the Project components and would notify the California Energy Commission and other responsible agencies as required by law. Where the temporary closure includes damage to the Project components, and where there is a release or threatened release of regulated substances or other hazardous materials into the environment, procedures would be followed in accordance with emergency response procedures set forth in the Emergency Action Plan and the Hazardous Materials Business Plan. Refer to Section 5.10, *Worker Safety*, for a description of the Hazardous Materials Business Plan and Emergency Action Plan. Procedures would include methods to control releases, notification of applicable authorities and the public, emergency response, and training for personnel in responding to and controlling releases of hazardous materials. Once the immediate problem is solved and the regulated substance/hazardous material release is contained and cleaned up, temporary closure would proceed as described above for a closure where there is no release of hazardous materials.

3.2 Permanent Closure

Project equipment has an anticipated useful life of up to 35 years. At that time, the Applicant would seek to either repower or decommission the Project. At the time of decommissioning, all decommissioning related activities would follow the then-applicable laws, ordinances, regulations, and standards as well as landowner preferences.

Upon decommissioning, many Project components would be suitable for recycling (e.g., batteries, copper and aluminum wiring, and concrete) or reuse (e.g., transformers, wiring). All dismantling, removal, recycling, and disposal of materials generated during decommissioning would comply with rules, regulations, and prevailing federal, state, and local laws at the time decommissioning is initiated and would use approved local or regional disposal or recycling sites as available.

Decommissioning activities would require similar equipment and workforce as construction. It is anticipated that the decommissioning activities for the Project can be completed in less than one year. The following activities would be involved:

- Removal and transportation of all Project components from the Project Site
- Removal of foundations, overhead and underground cables and lines, equipment pads and foundations, equipment cabinets, and ancillary equipment
- Discharge and removal of the battery modules, inverters, transformers, switchyards, and other electrical equipment
- Removal of civil facilities, access roads, security fences, and stormwater detention/sedimentation basins

Foundations for modular battery and inverter enclosures would include concrete, which can be crushed and recycled. Similarly, asphalt surfaced access roads would be removed, crushed, and recycled. Underground conduit and wire can be removed by uncovering trenches, removing the conduit and wire, and backfilling. The electrical wiring (overhead and underground) is made from copper and/or aluminum and would be reused or recycled.

Batteries, battery enclosures, inverters, transformers, switchgears and other electrical equipment would be recycled and/or reused to the maximum practical extent.

The Project Site would be restored and reclaimed to pre-construction conditions, to the extent practicable. Removal of transmission facilities on leased property within the PG&E Vaca-Dixon Substation parcel would be performed in a manner consistent with the site lease agreement with PG&E. After equipment and infrastructure is removed during decommissioning, holes or voids created by poles, concrete pads, and other equipment would be filled in with native soil and imported fill (as needed) to match the surrounding grade. Access roads and other areas compacted by equipment during the decommissioning would be decompacted to make the site conditions consistent and compatible with the surrounding area and associated land use at the time of decommissioning. Disturbed areas would be stabilized to minimize erosion.

The goal of the reclamation effort would be to restore the pre-development condition to the greatest extent practicable while minimizing new disturbance.