Environmental Mitigation Plan
for
Olean Steel Fabrication Plant
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Prepared pursuant to [contract number, date(TBD)]

with

New York State Energy Research and Development Authority
Albany, NY

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Communication Officers, Contact Information, Links		
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1. Environmental Mitigation Plan Summary

1.1. Overall philosophy and principles

Cimolai-HY has already acquired and is planning to make significant investment in the former Dresser-Rand/Siemens Energy industrial facility in Olean, NY (the "Facility"). The existing industrial manufacturing Facility is one of the largest manufacturing facilities in Cattaraugus County, and is a site where manufacturing has occurred for more than 110 years, providing multi-generational employment in the community and surrounding area. Most recently, under Siemens Energy, the Facility was used for the manufacturing of gas turbines and centrifugal compressor products used in oil and gas production, oil and gas transmission, and refining. Cimolai-HY is planning to repurpose the existing Facility into a steel fabrication plant to, among other things, support the clean energy sector and steel fabrication production for off-shore wind components. Specifically, Cimolai-HY will be partnering with Invenergy, the Proposer of the SCIP Proposal, to support the development of the New York Bight off-shore wind project and provide steel fabricated components, which will also contribute to the greater expansion of the clean energy sector supply chain within New York State.

Overall, the repurposing of the manufacturing Facility, formerly used to support the fossil fuel industry, will now support the renewable energy industry, which is a dramatic transformation that is fully consistent with New York State's aggressive climate goals and, specifically, NYSERDA's SCIP program.

1.2. Overall approach to incorporating data and stakeholder feedback

On September 8, 2022, the Cattaraugus County Industrial Development Agency ("CCIDA") accepted an application from Cimolai-HY for financial assistance related to the repurposing of the Facility (the "Project"). Prior to taking action on the application, the CCIDA was required to undertake an environmental review of the Project to assess whether the action has the potential to have a significant adverse environmental impact in accordance with the New York State Environmental Quality Review Act ("SEQRA"). As part of the application, Cimolai-HY also submitted Part 1 of the Full Environmental Assessment Form ("EAF") and supporting studies and reports regarding the potential environmental impacts associated with the Project (collectively the EAF and supporting studies and reports, the "SEQRA Materials"). By letter dated October 20, 2022, the CCIDA declared its intent to act as lead agency for the purposes of a coordinated review, as required by SEQRA, and distributed lead agency packages to all potentially interested and involved agencies, including NYSERDA. No Involved Agency contested lead agency status within the regulatory 30-day time period pursuant to SEQRA.

CCIDA conducted a coordinated review pursuant to SEQRA for the Project. CCIDA considered the significance of the potential adverse environmental impacts of the Project by: (i) carefully reviewing and examining the SEQRA Materials, the responses to

the EAF, the EAF Matter results for the Project, comments received from Interested and Involved Agencies including NYSDEC, and the potential impacts associated with the Project to the Site, stormwater and groundwater, wetlands, other water resources, agriculture, historic, archaeological and other recognized and/or protected resources, threatened or endangered plant and animal species, transportation and traffic, and community character and cumulative impacts, if any, and considered each of the other potential impacts as required by applicable regulation; (ii) considered the criteria in 6 NYCRR 617.7(c) in light of such impacts or potential impacts; and (iii) thoroughly analyzed the identified areas of relevant environmental concern.

Accordingly, by Resolution dated November 21, 2022, CCIDA found that the Project will not have any significant adverse impact on the environment in accordance with SEQRA and issued a Negative Declaration for the Project. NYSERDA, as an involved agency, received a copy of all SEQRA materials as part of the coordinated review of the Project. Pursuant to SEQR, for a coordinated review of the Project, the lead agency's (CCIDA's), determination of significance is binding on all involved agencies. See 6 N.Y.C.R.R. 617.6(b)(3)(iii) ("The determination of significance issued by the lead agency following coordinated review is binding on all other involved agencies.").

As such, an environmental review of the Facility under SEQRA has been completed. See attached Appendix F (copy of SEQRA materials for the Facility). Additionally, to the extent required, Cimolai-HY will take all commercially reasonable measures to facilitate, cooperate with, and otherwise provide information on any further environmental review of the Facility by NYSERDA pursuant to SEQRA.

1.3. Existing guidance and best practices that will be followed

Cimolai-HY is partnering with Cimolai S.p.A. ("Cimolai S.p.A."), an industrial manufacturing company specializing in the realization of large complex works and a world leader in the design, supply, and erection of various types of fabricated structural steel products for a wide range of unique infrastructure projects. Cimolai S.pA. will provide Cimolai-HY with technical expertise and personnel with significant technical and manufacturing experience in the fabrication of structural steel for the support, development, and operation of the Cimolai-HY Facility. Cimolai S.p.A. has obtained numerous national and international certifications for the quality of its manufactured products, for its quality management system, and for its health and safety programs at all of its production sites, demonstrating Cimolai S.p.A.'s commitment and capability of satisfying technical, regulatory and customer requirements. A full list of certifications Cimolai S.p.A. has obtained is provided below and in the following link: https://www.cimolai.com/certifications/.

The quality and management systems necessary to achieve and maintain these certifications are well established in Cimolai S.p.A.'s existing plants, and this

knowledge will be transferred to the Facility in Olean allowing it to fast-track the establishment of these programs and certifications here in Western NY.

Some of the certifications currently held by Cimolai S.p.A. include:

- ISO 9001: 2015 – International Standard for Quality Management System.

- AISC Certified Steel Fabricator, including endorsements for:
    - Buildings
    - Advanced Bridges
    - Fracture Critical
    - Highway and Bridge
    - Hydraulic Structures
    - Sophisticated Paint

- ISO 30415 – International Standard for Diversity and Inclusion Certification

- ISO 14001:2015 – International Quality Standard for Environmental Management System, covering the production of metallic structures for offshore.

- EN ISO 3834-2:2021 – Quality Certification for Fusion Welding Metallic Materials

- British Constructional Steelwork Charter - Steel Construction Sustainability

- EN 1090-1 – Design and Production of Structural Steel Components to execution class EXC4 (includes bridge over densely populated area, safety tanks for nuclear facilities).

- ISO 39001:2012 – Worldwide certification for the assembly and installation of metallic structures and road infrastructure.

Additionally, the Facility will require several operating permits. First, the Site has an existing National/State Pollutant Discharge Elimination System ("NPDES/SPDES") permit issued by NYSDEC, which may be transferred to Cimolai-HY, or Cimolai-HY will obtain its own NPDES permit. Cimolai-HY will adhere to the terms of any permit, and no new point sources will result from the Facility's operations. The anticipated water usage and liquid waste are 1,200 to 4,000 gallons per day. Liquid waste will be primarily sanitary wastewater, and no new water demand in excess off the previous use prior to the winding down of its operations is anticipated. Water demand will be markedly less than the previous use, as water will not be used in the production processes at the Facility. Additionally, it is estimated that the Facility will generate approximately 1 ton of characteristic hazardous industrial paint waste annually and Cimolai-HY will seek a Hazardous Waste ID and follow all applicable requirements. By

comparison, the prior use operated as a Resource Conservation and Recovery Act (RCRA) Large Quantity Generator (LQG) with ignitable, corrosive, and other hazardous chemicals. The Facility will also likely require an air permit as Cimolai-HY anticipates approximately 0.21 tons per year of nitrous oxide and 1.09 tons per year of hazardous air pollutants. By comparison, the air emissions that will result from Cimolai-HY's operations are a fraction of the air emissions allowed for the previous use. Siemens had an Air State Facility Permit issued by NYSDEC that allowed 95 tons per year of oxides of nitrogen and the release of 23 tons per year of hazardous air pollutants. The Facility will use state of the art air filtering and venting equipment and any required NYSDEC air permits will be obtained in conjunction with plant startup. The Site has an existing Petroleum Bulk Storage Tank certificate and a Chemical Bulk Storage certificate issued by NYSDEC. And finally, Cimolai-HY is in the process of obtaining a Building Permit for the Facility renovations. To the extent any further permits or approvals are required Cimolai-HY will obtain and comply with same in accordance with all applicable laws.

2. Stakeholder Identification and Stakeholder List

2.1. Overview and communication plan objectives

Cimolai-HY has conducted outreach to more than 18 entities to begin development and commissioning of the Facility, which includes coordination with state and local agencies, critical stakeholders, and local businesses. Because of the devastating loss of jobs from the closing of the Facility in 2021, local stakeholders have a keen interest and willingness to engage and coordinate with Cimolai-HY to ensure the opening and availability of jobs to the local workforce. As mentioned above, through the coordinated SEQRA review process, outreach has been made to several interested and involved agencies, who have been able to provide feedback on the Project.

The following Table 2 below is a list of key stakeholder groups and entities located in the region that Cimolai-HY has already conducted outreach and will continue to engage with as necessary.

Table 2. List of key stakeholders

	Key Stakeholders	Engagement Activity
1	County of Cattaraugus Industrial Development Agency ("CCIDA")	Applied and awarded financial assistance in the acquisition of the leasehold in the Site, acquisition and renovation of the Facility, and acquisition and improvement of the machinery, equipment, and other property. CCIDA was also the designated lead agency for the SEQRA review process. Cimolai-HY will continue to engage with the CCIDA as necessary throughout the benefits period.

2	New York State Department of Environmental Conservation ("NYDEC")	Involved or interested agency for the SEQRA review process. Coordinated with the NYDEC to review the Project for potential environmental impacts and applicable permitting required to operate the Facility. Cimolai-HY will continue to engage with NYSDEC as necessary throughout the permitting process and the operation of the Facility.
3	Empire State Development Corporation ("ESD")	Involved or interested agency for the SEQRA review process. Applied to and received acceptance from ESD to receive tax benefits in the form of the Excelsior Jobs Program. Cimolai-HY will continue to engage with ESD as necessary throughout the benefits period.
4	County of Cattaraugus (the "County")	Involved or interested agency for the SEQRA review process. Cimolai-HY is also in the process of obtaining a forgivable loan to achieve certain job commitments over a period of time. Cimolai-HY will continue to engage with the County throughout loan period.
5	City of Olean	Involved or interested agency for the SEQRA review process. Cimolai-HY will continue to engage with the City as necessary for the operation of the Facility.
6	Cattaraugus County Planning Board	Involved or interested agency for the SEQRA review process. Cimolai-HY will continue to engage with the City as necessary for the operation of the Facility.
7	Cattaraugus County Public Works	Involved or interested agency for the SEQRA review process. Cimolai-HY will continue to engage with the City as necessary for the operation of the Facility.
8	New York State Department of Health	Involved or interested agency for the SEQRA review process. Cimolai-HY will continue to engage with the City as necessary for the operation of the Facility.
9	New York State Energy Research & Development Authority ("NYSERDA")	Involved or interested agency for the SEQRA review process. Cimolai-HY is also in the process of submitting a SCIP seeking financial assistance to offset the needed renovation of the existing Facility and the significant capital costs required for the acquisition and commissioning

		of machinery and equipment. Cimolai-HY will continue to engage with NYSERDA as necessary throughout RFP process.
10	New York State Historic Preservation Office	Involved or interested agency for the SEQRA review process. Cimolai-HY will continue to engage with SHPO as necessary.
11	New York State Department of Transportation	Involved or interested agency for the SEQRA review process. Cimolai-HY will continue to engage with NYSDOT as necessary for the operation of the Facility.
12	New York Power Authority	Involved or interested agency for the SEQRA review process. Cimolai-HY will continue to engage with the NYPA as necessary for the operation of the Facility.
13	National Grid	The Facility will be powered by electricity from an existing 115V substation owned by National Grid. Cimolai-HY will to continue to coordinate with National Grid regarding the electrical and power needs of the Facility.
14	Allied Alarm Services, Inc ("Allied")	Potential partnership with Allied for alarm monitoring of the Facility, access control and video security, and life safety systems. Allied is a local business in the Western NY region located in Chautauqua County. Cimolai-HY plans to continue communication with Allied to finalize agreements for services.
15	Mazza Mechanical Services, Inc. ("Mazza")	Partnership with Mazza for HVAC maintenance services. Mazza is a local business in the Western NY region located in Erie County.
16	OSS Inc. ("OSS")	Partnership with OSS for security guard personnel. OSS is a New York based business.
17	Giardini Brothers Construction ("Giardini")	Partnership with Giardini for construction services of the Facility. Giardini is located in Olean, NY.
18	E&M Engineers and Surveyors ("E&M")	Partnership with E&M for survey and engineering support and services. E&M is located in Bradford, PA which is approximately 25 miles from the Facility.

The table above is not an exhaustive list of all potential stakeholders. Cimolai-HY is committed to continually support and incorporate local businesses and diverse groups of organizations to be involved in the progress and development of the Facility.

Further, Cimolai-HY's Local & Community Advocate will also act as a community liaison in recruitment of new hires and engaging of local business to support the Facility. Cimolai-HY will also partner with local trade schools and provide on-the-job training for hired employees in order to help provide career development and growth. Furthermore, Cimolai-HY will ensure local workforce, suppliers and community groups are engaged either directly or through established connections with the CCIDA, the County of Cattaraugus, Invest Buffalo Niagara, the City of Olean, Jamestown Community College, the Olean Chamber of Commerce, and other economic and business development stakeholders.

2.2. Communication officers/positions, responsibilities, and contact information

The following Table 3 below is a list of communication officers, their role, and name and contact information that will be provided to stakeholders to understand who should be called in the event of an issue or question. Cimolai-HY's Local & Community Advocate will be the contact and take on the role as the Facility and Operation Manager and also take lead as the main point of contact for localization of supply chain needs for the Facility. The contact information will be provided for each interested stakeholder and updated frequently by Cimolai-HY.

Table 3. Communication officers

Name/Title	Role/Responsibilities	Contact Information
Mike Johnson	Production Control & Maintenance, Supply Chain Localization Contact	Cimolai-HY@related.com
John Kelly	Manufacturing & Operations	
Charles John O'Byrne	Government Affairs & Communications	
Emad Lotfalla	Development & Operations	
Nash Tahmaz	Development	
John Palmer	Vice President of Business & Financial	
Tanya Diaz-Goldsmith	Diversity, Equity & Inclusion Officer	
Emad Lotfalla	Executive Vice President for Development & Operations	
Denny Regini	Project Lead for Cimolai-HY Olean Facility	
Andrea Zanetti	Production & Manufacturing Control	

Angelo Natolini	Head of Maintenance & Operations Management	
Enzo Baro	Production Manager and Shop Superintendent	
Alessandro Petti	Director of Technical & Commercial Operations	

2.3. Identification of stakeholders

As discussed above, an environmental review of the Facility under SEQRA has been completed. Through that process, several stakeholders have been identified and were involved in the SEQRA review. Cimolai-HY will continue to coordinate with all stakeholders as necessary while it works to reopen and operate the Facility.

2.4. Participation in stakeholder and technical working groups

There will be a significant amount of training for newly hired employees to bring the Facility to an operational state and improve efficiency of production to the point where the Facility will be competitive in the market place. Cimolai-HY will partner with local trade schools in order to provide on-the job training and retention of the employees from the community. Cimolai-HY will continue to explore new ways to modernize and improve its operations and use technologies that increase energy efficiencies and reduce emissions.

Cimolai-HY also actively seeks and responds to RFPs to partner on large infrastructure projects, including off-shore wind projects. Cimolai-HY will be partnering with Invenergy, the Proposer of the SCIP Proposal, to support the development of the New York Bight off-shore wind project. Because the Cimolai-HY Facility has the capacity for additional manufacturing of off-shore wind components, Cimolai-HY will actively solicit additional partnerships with other developers of offshore wind, onshore wind and other green energy projects.

3. Supporting Other Research

Cimolai-HY will work with Invenergy and other developers as necessary in any environmental research of the Facility or Cimolai-HY's participation in Invenergy's New York Bight off-shore wind project, or any other clean energy project of which Cimolai-HY contributes supply chain materials.

4. Proposed Mitigation of Impacts to Marine Mammals and Sea Turtles

There are no surface water bodies at or adjacent to the Site that would be impacted by the Project. Given the nature of the Project and the location of the Facility, no impacts to marine mammals and sea turtles are expected.

5. Proposed Mitigation of Impacts to Birds and Bats

According to the NYSDEC Environmental Assessment Form Mapper ("EAF Mapper"), there are no state regulated wetlands or significant natural communities on or adjacent to the Project Site. U.S. Fish and Wildlife Service correspondence shows the potential for threatened or endangered species including Clubshell, Northern Rifleshell, and Rayed Bean Clams (Endangered), as well as Northern Long-eared Bats (Threatened). Additionally, the EAF Mapper also notes the potential presence of Wavyrayed lamp mussel and Longhead darter nearby. However, there are no waterbodies on the Site so the presence of aquatic fauna is unlikely. Similarly, there will be no tree clearing that would impact the Northern Long-eared Bat or its habitat. The long term industrial use of the Site most likely precludes it for habitat for the Northern Long-eared Bat. Further, the plant renovations contemplated by the Project are interior only and would be unlikely to disturb any nearby habitats. As the Site has been operating as an industrial site for over 110 years, it is unlikely that the Site has been a habitat for threatened or endangered species for over a century and the Project would continue to allow for industrial uses.

6. Proposed Mitigation of Impacts to Fish, Invertebrates and their Habitats

There are no surface water bodies at or adjacent to the Site that would be impacted by the Project. Given the nature of the Project and the location of the Facility, no impacts to fish, invertebrates and their habitats are expected.

7. Consideration of Subsea and Overland Cables

There are no surface water bodies at or adjacent to the Site that would be impacted by the Project. Given the nature of the Project and the location of the Facility, no impacts to subsea or overland are expected.

8. Additional Considerations

As stated above, an environmental review of the Facility under SEQRA has been completed. See attached Appendix F (copy of SEQRA materials for the Facility). The CCIDA, as lead agency after a thorough review, determined that the Project will not have any significant adverse impacts on the environment and issued a Negative Declaration. As detailed below, the potential impacts associated with the Facility were thoroughly analyzed. Overall, the Facility renovations are entirely internal, the footprint of the buildings will remain unchanged and the soil undisturbed, and, when compared to the prior manufacturer, the Project will result in fewer workers onsite, less traffic, and less energy and water usage than the last manufacturing use.

8.1. Impact on Land Resources

The Site is located in an Industrial District ("ID") in the City of Olean zoning map. The manufacturing use proposed by the Project is a permitted principal use in the ID. See City of Olean City Code § 4.7.2.1.13 (allowing "Manufacture, fabrication, extraction, assembly, and other handling of material, including offices . . ."). The surrounding area includes a mix of industrial, residential, and commercial uses which will not be disturbed by the Project. Several industrial sites are located near or adjoining to the Site, and some such sites are included on the New York State Department of Environmental Conservation ("NYSDEC") Site Remediation Database for spills or cleanup programs, but all of those sites have been closed by NYSDEC and have controls in place, including use restrictions, operation and maintenance requirements, prohibitions on use of groundwater for drinking, site covers, soil vapor extraction systems, and active subslab depressurization systems. The Project will not disturb any soil on the nearby remediated properties or otherwise impact the controls in place to protect human health and the environment from remaining contaminants.
Ground disturbance for new concrete pads and footings to support the conveyor foundations will be in discrete locations totaling less than 0.9 acres and less than three to four feet deep, or as required to get below the frost line. Cimolai-HY will keep excavated soil onsite as appropriate, and any excavated soil will be removed in accordance with a Soil and Groundwater Management Plan.

During construction, trucks and other machinery will be utilized to excavate and haul away debris, packaging, and other materials, pour concrete, and deliver material to be used in the improvements. During operation, waste management will be conducted in accordance with applicable federal, state, and local law.
Manufacturing operations will produce scrap metal waste which will be removed from the site for recycling or reuse.

8.2. Impact on Water Resources

There are no surface water bodies at or adjacent to the Site that would be impacted by the Project. The NYSDEC Environmental Assessment Form Mapper ("EAF Mapper") notes the presence of a Primary Aquifer and a Principal Aquifer; however, these will be undisturbed by the project. The Site is currently located in a Zone B District, defined by the Federal Emergency Management Agency (FEMA) as an area between the limits of the base flood and the 0.2-percent-annual-chance (500-year) flood. The Site has an existing National Pollutant Discharge Elimination System ("NPDES") permit issued by NYSDEC, which may be transferred to the Applicant, or the Applicant will obtain its own NPDES permit. The Applicant will adhere to the terms of any permit, and no new point sources will result from the Project. The anticipated water usage and liquid waste are 1,200 to 4,000 gallons per day. Liquid waste will be primarily sanitary wastewater, and no new water demand in excess off the previous use prior to the winding down of its operations is anticipated. Water demand will be markedly less than the previous use, as water is not used in the production at the Facility.

8.3. Impact on Air Resources

Minor air emissions will result from the Project during construction and operation. During construction, cranes, trucks, man-lifts, excavators, and other handheld tools that may result in air emissions are planned. During operation, mobile sources of emissions will be limited to cranes, delivery trucks, and smaller vehicles. Process-related emissions include air emissions from blasting machines, drilling machines, milling equipment, and painting cabins. The previous use included an Air State Facility permit issued by NYSDEC. By comparison, the air emissions that will result from the Project are a fraction of the air emissions allowed under the previous permit. For example, the last permit allowed 95 tons per year of oxides of nitrogen, and the Project expects 0.21 tons per year of nitrous oxide. Similarly, the previous air permit allowed the release of 23 tons per year of hazardous air pollutants ("HAPs"), and the Project anticipates only 1.09 tons per year of HAPs. Cimolai-HY will likely need to apply for an air permit. In that case, Cimolai-HY will comply with the terms of its air permit. State of the art air filtering and venting equipment will be used and the required NYSDEC air permits will be obtained in conjunction with plant startup.

8.4. Impact on Ecological Resources (Plants and Animals)

According to the EAF Mapper, there are no state regulated wetlands or significant natural communities on or adjacent to the Project Site. U.S. Fish and Wildlife Service correspondence shows the potential for threatened or endangered species including Clubshell, Northern Rifleshell, and Rayed Bean Clams (Endangered), as well as Northern Long-eared Bats (Threatened). Additionally, the EAF Mapper also notes the potential presence of Wavyrayed lamp mussel and Longhead darter nearby. However, there are no waterbodies on the Site so the presence of aquatic fauna is unlikely. Similarly, there will be no tree clearing that would impact the Northern Long-eared Bat or its habitat. The long term industrial use of the Site most likely precludes it for habitat for the Northern Long-eared Bat. Further, the plant renovations contemplated by the Project are interior only and would be unlikely to disturb any nearby habitats. As the Site has been operating as an industrial site for over 110 years, it is unlikely that the Site has been a habitat for threatened or endangered species for over a century and the Project would continue to allow for industrial uses.

8.5. Impact on Agricultural Resources

The Site is not in a designated agricultural district, and the USDA NRCS soil survey indicates that although there is prime farmland to the south of the Site, the Site itself consists of primarily urban land. Further, the Site has not been used for farming and not for industrial purposes. Given the longstanding industrial use at the Site, the Site is not suitable for agricultural use.

8.6. Impact on Transportation

During operations, approximately 80 percent of inbound material is expected to be delivered by rail to a staging area between Plant 1 and Plant 2. Material will be loaded on the conveyor for entry to the respective plant. The remaining inbound material would be delivered by truck. The majority of outbound material will be trucked out and supported by onsite industrial rail lines running through the center of the Site and leading to the Buffalo Line and the Olean Secondary Line. The number of parking spaces and use of outdoor lights is not expected to change. With the exception of the movement of material, all steel fabrication operations will occur within Plant 1 and Plant 2. No outdoor industrial manufacturing except for the shot blaster is expected. The plants will operate in two shifts, from 7:30AM - 3:30AM. The planned 10-hour staggered shifts will limit any traffic impacts on nearby roadways. Further, truck traffic will be low, with only 10 inbound and outbound trucks per day anticipated. And given the Site's close proximity (0.35 miles) from the Southern Tier Expressway, the Project is unlikely to result in noticeable or adverse traffic impacts to surrounding roadways.

8.7. Impact on Energy

The plant will be powered by electricity from an existing 115V substation owned by National Grid and natural gas for heating and cooling. The estimated electricity demand during operation is approximately 4.5 million kWh to 6 million kWh, and natural gas demand is expected to be 13.3 million cu-ft.

8.8. Impact on Odor, Noise and Light

The Project will be completed in a single phase and is anticipated to take approximately 9 months. Some odor during construction and operation is possible. Noise levels are anticipated to exceed ambient levels, particularly during construction but will be limited and comply with any local ordinance governing noise. Operational noise will be internal to the plants, and no industrial operations will be conducted outside.

8.9. Impact on Public Health

The EAF Mapper notes that there are sites near or adjacent to the Site that are NYSDEC remediation parcels. However, all of the adjacent Brownfield Cleanup Program sites have received certificates of completion. Regardless of the existence of remaining contaminants and engineering controls, including a cover system, the Project will not disturb the soil in any of these areas or otherwise impact them. While herbicide and pesticide may be used during construction and operations, it will be done sparingly to avoid impacts to public health and ecological systems. The Project has been designed to minimize waste and recycle, and Cimolai-HY will follow laws and regulations governing the disposal of solid waste during construction and operations. The Project

anticipates approximately 1 ton of characteristic hazardous industrial paint waste. The Applicant will seek a Hazardous Waste ID and follow all applicable requirements.

8.10. Impact on Growth and Character of the Community and Neighborhood

The Site has a long history of industrial use beginning in the 1890s. Sanborn Maps from the turn of the century show residential units and a railroad transect, but by the 1930s, only industrial uses are shown. These uses include a machine shop, foundry, sand storage, a grinding building, warehouse and office space. Most recently Siemens Energy manufactured large turbine and compressor products for the oil and gas industry at the Site. Because of its prior use, the Site was operating as a Resource Conservation and Recovery Act (RCRA) Large Quantity Generator (LQG) with ignitable, corrosive, and other hazardous chemicals.

9. Project Decommissioning

Overall, the repurposing of the existing manufacturing facility, formerly used to support the fossil fuel industry, and will now support the renewable energy industry, is a look towards the future, and the long term success and sustainability of the Facility. As such, there are no plans for decommissioning the Facility. However, Cimolai-HY will work with Invenergy, or other developers as necessary, to explore ways of decommissioning the structural steel components, with a focus on re-use and recycling first, with waste disposal as the last option.