

September 16, 2025

**Decommissioning Plan
CFP IL Bluestem Solar LLC
Kane County, Illinois
21 MW DC (15 MW AC) Community Solar Facility**

1. Introduction

This Decommissioning Plan (“Plan”) has been prepared on behalf of CFP IL Bluestem Solar LLC to support the Special Use Permit application and related approvals required for the construction and operation of the Bluestem Solar project, a community scale photovoltaic (“PV”) facility in Kane County, Illinois. The purpose of this Plan is to describe in detail the methods, responsibilities, and standards that will govern the removal of all solar facility components and the restoration of the project site once the facility has reached the end of its useful life or is deemed abandoned.

The preparation of this Plan ensures compliance with the Kane County Zoning Ordinance, the Kane County Stormwater Management Ordinance (Chapter 9), and the Illinois Department of Agriculture Agricultural Impact Mitigation Agreement (AIMA), as well as all applicable state and federal environmental requirements. The Plan also reflects accepted best practices for solar facility decommissioning.

The intent of the Plan is twofold: (1) to ensure that the Bluestem Solar site is responsibly and safely decommissioned at the conclusion of the project’s life cycle, and (2) to guarantee that the property can be restored to its pre-construction agricultural use with minimal long-term impact to soils, drainage, and surrounding landowners.

2. Project Description

Bluestem Solar is designed as a community-scale PV facility with a total system size of approximately 21 MW DC (15 MW AC). The project is located in Kane County, Illinois, with site coordinates at 41°45'08.6"N, 88°24'16.0"W

The project area encompasses approximately 139 acres, of which about 78 acres will be enclosed by the facility fence and contain solar arrays, access drives, and electrical infrastructure. The remaining acreage includes buffer areas, drainage ways, and setback space consistent with zoning requirements.

Facility components include:

- PV modules mounted on a driven pile racking system.
- String inverters mounted on concrete equipment pads.
- Medium-voltage (MV) underground electrical lines within the array boundary to the Point of Interconnection (POI).
- Step-up transformers filled with biodegradable mineral oil.
- Overhead power lines and poles at the Point of Interconnection (POI), subject to ComEd ownership boundary.

- Gravel access road with locked gate.
- An 8-foot agricultural woven-wire perimeter fence with no barbed wire, designed to meet Kane County's screening and security requirements.

The facility is expected to operate for approximately 35 years. At the end of its useful life, all above-ground and below-ground infrastructure associated with the solar facility will be removed in accordance with this Plan.

3. Decommissioning Trigger and Timeline

A solar facility is considered abandoned if it ceases operation for a period of 12 consecutive months. Once determined to be abandoned or otherwise scheduled for end-of-life decommissioning, Bluestem Solar will initiate decommissioning activities within 12 months.

Decommissioning will be substantially completed within 6 months of initiation. The project owner will target a total duration of approximately 5 months, contingent on weather and site conditions. Major earthwork, excavation, and restoration activities will be scheduled outside of winter/frozen ground conditions, as frozen soils may prevent proper backfilling, compaction, and vegetation establishment.

4. Decommissioning Activities

Decommissioning will occur in two phases:

1. Dismantling and Removal of Equipment
2. Site Restoration and Reclamation

4.1 Dismantling and Removal

The following actions will be taken:

- **PV Modules:** All modules will be disconnected, removed from racking, and transported for resale or recycling. Modules will be stacked on pallets, shrink-wrapped, and stored until hauled to a licensed facility.
- **Racking and Structural Supports:** Steel and aluminum racking will be dismantled. All driven piles, helical screws, or ballasted supports will be removed to a depth of at least 60 inches below grade, consistent with AIMA requirements.
- **Inverters, Transformers, and Electrical Equipment:** All power electronics will be removed from pads, disconnected from electrical circuits, and transported to recycling facilities. Step-up transformers will be drained of biodegradable mineral oil using spill-prevention procedures.
- **Underground Cables and Conduit:** Underground electrical cabling will be excavated and removed from within the fenced array. Cable buried outside the project fence at the POI will be removed up to the point of utility ownership.
- **Overhead Lines and Poles:** Overhead lines and poles installed by the project entity will be dismantled. Poles and terminations owned by ComEd will remain the property of the utility.
- **Concrete Pads:** Equipment pads and foundations will be broken apart and removed to at least 12 inches below grade. If permitted, clean concrete may be crushed and reused as fill or aggregate.
- **Fencing and Gates:** All perimeter fencing, posts, and access gates will be removed.

- Screening and Landscaping: All screening and landscaping plantings, including trees and shrubs installed along the facility fence line, shall be removed during decommissioning together with the perimeter fencing, unless otherwise requested in writing by the landowner. If the landowner elects to retain the trees, Bluestem Solar will coordinate with Kane County to document the request prior to commencement of decommissioning activities
- Access Roads and Culverts: Gravel access roads and associated culverts will be removed unless requested by the landowner to remain in place.
- Miscellaneous Improvements: Signage, O&M structures, staging yards, and any remaining debris will be cleared from the site.

4.2 Utility Coordination

- Bluestem Solar will coordinate with ComEd to disconnect the facility at the POI.
- Utility-owned equipment, including poles, meters, and protective devices, will remain under ComEd's jurisdiction.
- All circuits will be verified as de-energized prior to commencement of dismantling. Lock-out/tag-out procedures will be followed.

5. Safety and Environmental Protection

- Lock-Out/Tag-Out: All electrical equipment will be locked and tagged out prior to dismantling.
- Circuit Testing: All electrical connections will be tested locally to confirm that no electric current is present before dismantling.
- Public Safety: Fencing and signage will remain in place until modules and racking have been removed.
- Worker Safety: All activities will comply with OSHA standards for construction and demolition, including the use of personal protective equipment (PPE).
- Dust Control: Water will be applied as needed to minimize dust from soil disturbance.
- Spill Prevention: Absorbent pads, spill kits, and containment measures will be on site during removal of transformers and equipment with fluids.
- Debris Cleanup: A final site walkthrough will be conducted to remove all debris and trash generated during decommissioning, including wind-blown materials outside the immediate fence line.
- Sanitary Facilities: Sanitary facilities will be provided on-site for workers performing decommissioning activities.

6. Waste Management and Recycling

- PV Modules: Recycled through manufacturers' take-back programs or licensed PV recycling facilities.
- Racking Steel and Aluminum: Delivered to local scrap recyclers.
- Copper Wiring: Salvaged and recycled.
- Transformers: Drained of fluids, disassembled, and recycled.
- Concrete: Broken and removed to 12 in below grade; crushed for reuse if permitted.
- Non-Recyclable Materials: Transported to licensed solid waste disposal facilities.
- Documentation: Bluestem Solar will maintain records of all recycling and disposal to provide to Kane County upon request.

7. Site Restoration

- **Topsoil and Subsoil Handling:**
 - Topsoil shall be stripped, stockpiled, and segregated from subsoil.
 - Excavated areas shall be backfilled with clean subgrade material of similar quality to the surrounding area, compacted to a density similar to surrounding grade material, and capped with topsoil.
 - All unexcavated areas compacted by equipment used in decommissioning shall be de-compacted in a manner that restores the soil profile to compatible density with surrounding agricultural land.
 - Where possible, topsoil shall be replaced at a minimum of the original depth and surface contours.
 - Any topsoil deficiency or trench settling shall be mitigated with imported topsoil consistent with the quality of the affected site.
- **Drainage Repair:**
 - All subsurface drain tiles shall be repaired or replaced.
 - Waterways, culverts, and ditches shall be restored.
 - An independent drainage engineer shall be present during decommissioning to ensure that drainage tiles, waterways, and culverts are repaired as work progresses, in compliance with the AIMA.
- **Vegetation:**
 - All disturbed areas shall be hydroseeded with a ground treatment approved by the Kane County Building and Zoning Department.
 - Weed control shall be provided by a licensed Illinois applicator in a manner that prevents the spread of weeds onto adjacent agricultural land until vegetation is fully established.
- **Erosion and Sediment Control:**
 - Temporary BMPs such as silt fence, straw wattles, and erosion blankets used until vegetation is established.
 - Compliance with Kane County Stormwater Management Ordinance.
 - A Soil Erosion Control Plan shall be approved by the Kane–DuPage Soil & Water Conservation District (SWCD) prior to commencing decommissioning work.

8. Permits and Approvals

Prior to commencing decommissioning, Bluestem Solar will obtain:

- Kane County Stormwater Management Permit under Chapter 9.
- Soil Erosion and Sediment Control Plan approval from Kane SWCD.
- AIMA compliance certification with Illinois Department of Agriculture.
- Any additional permits required at time of decommissioning.

9. Decommissioning Schedule

- Mobilization and Utility Disconnect: ~1 month
- Equipment Removal and Recycling: ~3 months
- Site Restoration and Vegetation Establishment: ~2 months (overlapping)
- Total Duration: 5–6 months depending on season and weather

10. Financial Assurance

- Surety Instrument: A bond or letter of credit in favor of Kane County.
- Phased Contribution Schedule:
 - Year 1 (COD+1): 10% of estimated decommissioning cost
 - Year 6: 50%
 - Year 11: 100% (based on updated estimate)
- Cost Estimate: Opinion of Probable Cost prepared by Illinois Professional Engineer prior to building permit issuance; updated every 5 years.
- Return of Surety: Upon County inspection and written verification that decommissioning has been satisfactorily completed.

11. Final Inspection and Closeout

- Upon completion, Kane County will inspect the site to confirm removal and restoration are consistent with this Plan.
- Certification of compliance with AIMA will be submitted.
- Surety will be released upon written confirmation of successful restoration.

12. Conclusion

This Decommissioning Plan ensures that the Bluestem Solar facility will be responsibly dismantled at the end of its useful life. All PV modules, racking, foundations, electrical equipment, and civil improvements will be removed, with materials recycled wherever possible. The site will be restored to agricultural use consistent with pre-construction conditions.

The Plan meets the requirements of Kane County and the Illinois Department of Agriculture, provides financial assurance to protect landowners and the County, and ensures long-term stewardship of the land.