

# **EBBA SOLAR PROJECT**

## **Lincoln County**

### **Hazards and Emergency Procedures**

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#### **INTRODUCTION**

BRP Rhodochrosite 1, LLC (Applicant) proposes to construct, operate, maintain, and decommission the Ebba Solar Project (Project). The Project would be an up to 300-megawatt (MW) alternating current (AC) solar photovoltaic (PV) power generating facility with a battery energy storage system (BESS) on up to approximately 3,195 acres of private land in Lincoln County, Colorado. The Project would interconnect to the regional grid via an interconnection to the Lincoln Substation about 0.2 miles north of the.

This plan describes the potential hazards to the public and Project employees that could be associated with the Project and the measures that would be taken to respond to any incidents that occur.

#### **HAZARDS OF FIRE, EXPLOSION, AND OTHER DANGERS**

This section describes potential hazards to the health, safety and welfare of employees and the general public associated with the proposed Project.

Electrical equipment including inverters and transformers would be housed in appropriately rated National Electric Manufacturers Association (NEMA) enclosures. Each BESS container or building module would have its own fire detection, suppression, and alarm systems. There would be no vegetation or other flammable fuels in the substation and BESS areas. Vegetation around buildings and electrical equipment in the solar field would be maintained to minimize fire risk.

The Project will coordinate with fire safety personnel to ensure adequate plans and systems are in place in the unlikely event a fire issue occurs at the solar project or BESS. Furthermore, appropriate signage containing necessary contact and safety information for the BESS will be displayed in accordance with local code and coordination with County and fire district officials and staff. Also, a walk-through of the solar project and BESS site with the local authorities and public safety agencies would be scheduled once construction is complete. Emergency personnel will also be given the key or code to access the facility.

A detailed Fire Protection Plan would be provided to the County and the local fire district for review and approval prior to the start of construction.

PV solar projects generally provide minimal risk for explosion hazards. During operation, there would be limited flammable / explosive materials on-site. During construction, there would likely be some fuel stored on site for construction equipment. All fuel storage facilities would meet state and local regulatory standards.

### **Worker Health and Safety**

During proposed Project construction, standard health and safety procedures described in a detailed Health and Safety Plan (HASP) would be implemented and would be in accordance with Occupational Safety and Health Administration (OSHA) standards and industry best practice to minimize the risk of accidents or injuries from both Project and natural hazards. Safety planning and regular training sessions would occur to ensure that workers were adequately prepared to address any anticipated site-specific hazards, such as electrocution, fires, and accidents (such as slips, trips, or falls). In addition, workers would be trained on the appropriate use of safety equipment and personal protective equipment (PPE).

The Applicant would require all employees and contractors to adhere to the HASP and emergency response plans. In addition, all construction and operation contractors would be required to operate under their own HASP that meets the minimum Project and industry standards. All contractors would be required to maintain health and safety records.

Materials Safety Data Sheets (MSDS) would be available for any hazardous materials used on-site. The program would identify types of hazardous materials to be used during construction and operations activities. An SDS document control program shall be included within the Hazardous Materials program to provide the necessary information on chemicals stored and used on site.

### **Public Safety**

As discussed above, the Project is not expected to create any significant potential hazards to public safety during construction or operation. The Project would generate additional traffic on local roads during the construction period. The Project would develop and implement a traffic management plan in consultation with the County to minimize the effects this short-term traffic increase would have on local users.

The Project site would contain electrical equipment, but the perimeter would be surrounded with security fencing to preclude entry by non-project personnel. In addition the on-site high voltage electrical facilities like the site substation and the BESS would be surrounded by additional security fencing and signage to further avoid exposure to electrocution risk.

## **ENVIRONMENTAL HAZARDS**

This section describes the potential risks of environmental damage and contamination that could result from the materials used at or activities occurring at the proposed facility.

The primary wastes generated by PV solar projects during construction, operation, and maintenance would be nonhazardous solid and liquid wastes. These would include defective or broken electrical materials, empty containers, the typical refuse generated by workers, and other miscellaneous solid wastes. **Table 1** below outlines the typical wastes that could be expected. Waste management would emphasize the recycling of wastes where possible and would identify the specific landfills that would receive wastes that cannot be recycled.

Table 1 Wastes Potentially Generated by Construction of the Project				
Waste	Origin	Composition	Classification	Disposal
Scrap wood, steel, glass, plastic, paper	Construction activities	Normal refuse	Nonhazardous	Recycle and/or dispose of in industrial or municipal landfill
Scrap metals	Construction activities	Parts, containers	Nonhazardous	Recycle and/or dispose of in industrial or municipal landfill
Waste oil	Construction equipment and vehicles	Solids	Used Oil	Recycle at a permitted facility
Oily rags, oil sorbent	Cleanup of small spills	Hydrocarbons	Used Oil	Recycle or dispose at a permitted facility
Spent batteries	Equipment	Metals	Universal waste solids	Recycle or dispose offsite at a permitted facility
Sanitary waste	Portable toilet holding tanks	Solids and liquids	Nonhazardous liquid	Remove by contracted sanitary service

Limited quantities of hazardous materials would be used and stored on site for construction and O&M activities. During construction, the primary hazardous materials on site would be the fuels and solvents associated with construction equipment. **Table 2** lists the hazardous materials anticipated that would be stored and used on site during operation. Material Safety Data Sheets (SDSs) for each of these materials would be discussed in the Hazardous Materials Management Plan and Emergency Response Plan developed for the Project prior to construction.

Table 2 Hazardous Materials That May Be Used During Operation		
Hazardous Material	Storage Description; Capacity	Storage Practices and Special Handling Precautions
Equipment fuel	Above-ground tanks of various sizes	Secondary containment would be provided around each tank or group of tanks.
Batteries, lead acid based and/or lithium ion	Battery-energy storage system, battery-based emergency back-up power at each of the PCS.	If used, sufficient cooling capacity to maintain ambient temperatures appropriate for the selected battery would be provided.
Propane	Generator-based emergency back-up	If used, would be managed as required
Herbicide Pesticide	Brought on site by licensed contractor, used immediately.	No mixing will occur on site and no herbicides will be stored onsite

The potential for exposure of the public to hazards and hazardous materials during construction and operation would be low because of the undeveloped nature of the adjacent and surrounding areas and the proposed plans for handling such materials during the construction and operation of the Project.

### **Hazardous Materials Management**

Batteries, fuels, oils, lubricants, and solvents would be the primary hazardous and flammable materials that would be on-site during construction and operation. Small quantities of additional common hazardous materials would be used on-site during construction, including antifreeze and used coolant, latex and oil-based paint, paint thinners and other solvents, cleaning products, and herbicides.

Prior to construction, the Project will develop a Hazardous Materials Management Plan describing the specific measures that would be followed to manage and control the use of them on site. Also, a Spill Prevention Control and Countermeasure (SPCC) Plan would be developed if needed to define the measures to be employed to prevent spills and leaks and respond to them if they occur.

## **EMERGENCY PROCEDURES**

Despite best efforts, accidents, acts of nature, and other emergency situations can occur. Effective preparations for emergency response can reduce injuries, prevent or minimize environmental impacts, protect employees and the community, reduce asset losses, and minimize downtime. This section outlines the emergency response plan to be implemented in the event of fire, explosion or other event that could endanger the public health, safety, and welfare.

Prior to the start of construction, an Emergency Preparedness and Response Plan would be developed for the Project. This plan would provide construction crews and agencies with Project-specific information concerning emergency and response procedures. The primary objective of this plan would be to provide methods for hazards identification, prevention of and response to emergencies, a chain of command and responsibility, and a strategy for emergency communications for a broad spectrum of emergency situations.

Following the completion of construction, the Emergency Preparedness and Response Plan would be updated as needed to address the risks associated with Project operations.

### **Emergency Contacts**

The emergency contacts listed below would be called as appropriate, depending on the situation (e.g., fire, injury). The Emergency Contact List would be verified and updated as needed at the beginning of construction and updated throughout the Project by the construction contractor(s) and operational managers to ensure accurate contact information.

Further guidance on emergency response, notification, and reporting protocols would be included in some of the additional management plans that would be developed and approved prior to the start of construction. These could include a Hazardous Materials Management Plan, Spill Prevention Plan, Stormwater Pollution Prevention Plan, and Fire Prevention and Response Plan. Additional notifications, both internal and to appropriate agencies, could also be required on a case-by-case basis. A full

emergency contact list would be included in the final plans and posted at the Project site at all times during construction and operation and would be updated as necessary.

**Fire / Emergency Medical: Call 911 first**

Limon Area Fire Protection District  
(719) 775-8155

**Law Enforcement: Call 911 first**

Lincoln County Sheriff's Office  
(719) 743-2846