

**Strong Breeze Wind Project -
Decommissioning Plan Report**

DRAFT REPORT



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July 26, 2017

**STRONG BREEZE WIND PROJECT -
DECOMMISSIONING PLAN REPORT**

Table of Contents

ABBREVIATIONS	1
1.0 INTRODUCTION	1.1
1.1 PROJECT OVERVIEW.....	1.1
1.2 REPORT REQUIREMENTS.....	1.1
2.0 PROBABLE FUTURE USE OF THE FACILITY	2.1
3.0 DECOMMISSIONING	3.1
3.1 DECOMMISSIONING DURING CONSTRUCTION (ABANDONMENT OF PROJECT)	3.1
3.2 DECOMMISSIONING AFTER CEASING OPERATION.....	3.1
3.2.1 General Environmental Protection During Decommissioning.....	3.1
3.2.2 Pre-Dismantling Activities.....	3.2
3.2.3 Equipment Dismantling and Removal.....	3.2
3.3 SITE REHABILITATION/RESTORATION	3.4
3.3.2 Water Bodies	3.5
3.3.4 Municipal Road Allowances.....	3.6
3.3.1 Natural and Forested Lands.....	3.6
3.3.2 Spills.....	3.6
3.4 MANAGING EXCESS MATERIALS & WASTE.....	3.6
4.0 DECOMMISSIONING NOTIFICATION AND COMMUNICATIONS	4.1
5.0 OTHER APPROVALS	5.1
6.0 SIGN-OFF PAGE	6.1
7.0 REFERENCES	7.1

LIST OF TABLES

Table 1.1: Decommissioning Plan Report Requirements (as per O. Reg. 359/09 – Table 1)	1.2
Table 3.1: Typical Facility Decommissioning Waste Materials and Modes of Disposal.....	3.7
Table 5.1: Potential Decommissioning Permits and Approvals.....	5.1

LIST OF APPENDICES

APPENDIX A: PROJECT LOCATION

**STRONG BREEZE WIND PROJECT -
DECOMMISSIONING PLAN REPORT**

Abbreviations

DFO	Fisheries and Oceans Canada
DPR	Decommissioning Plan Report
IESO	Independent Electricity System Operator
GC	General Contractor
km	kilometre
kV	kilovolt
LTVCA	Lower Thames Valley Conservation Authority
m	metre
MW	megawatt
MNRF	Ministry of Natural Resources and Forestry
MOECC	Ministry of the Environment and Climate Change
O. Reg.	Ontario Regulation
SBWPP	Strong Breeze Wind Power Partnership
the Proponent	SBWPP
the Project	Strong Breeze Wind Project
OPSS	Ontario Provincial Standard Specification
PPE	personal protective equipment
PV	Photovoltaic
REA	Renewable Energy Approval
ROW	right-of-way
Stantec	Stantec Consulting Ltd.

STRONG BREEZE WIND PROJECT - DECOMMISSIONING PLAN REPORT

Introduction
July 26, 2017

1.0 INTRODUCTION

1.1 PROJECT OVERVIEW

Strong Breeze Wind Power Partnership (SBWPP or the Proponent) is proposing to develop, construct, and operate the Strong Breeze Wind Power Project (the Project) in the Municipality Dutton Dunwich, within Elgin County, Ontario. The Project was awarded a power purchase contract with the Independent Electricity System Operator (IESO) in March 2016. The Project requires a Renewable Energy Approval (REA) as per Ontario Regulation (O. Reg.) 359/09 (as amended May 2016) under Part V.0.1 of the Ontario *Environmental Protection Act*. Strong Breeze Wind Power Partnership has retained Stantec Consulting Ltd. (Stantec) to prepare the REA application, as required under O. Reg. 359/09.

The proposed Project is considered a Class 4 Wind Facility according to subsection 6(3) of O. Reg. 359/09. The Project will include up to 20 wind turbine generators each with a rated capacity between 3.0 MW and 4.2 MW depending on the make/model chosen. The REA application for the Project will include 20 turbine locations but the actual number of turbines will be chosen during detailed design and the final maximum installed nameplate capacity will be no greater than 57.5 MW. Other Project components include: access roads, electrical lines, substation, communication tower, meteorological tower(s), temporary construction areas, corner improvements, and an operations and maintenance building. The Project will connect to the existing 230 kilovolt (kV) transmission circuit located north of Aberdeen Line and west of Iona Road. A map showing the Project Location¹ is provided in **Figure 1, Appendix A**.

1.2 REPORT REQUIREMENTS

This draft Decommissioning Plan Report describes the Project activities planned during the decommissioning phase so that potential negative environmental effects may be identified and mitigation measures can be proposed where required.

The draft Decommissioning Plan Report is one component of the REA application for the Project and has been prepared in accordance with O. Reg. 359/09 and the Ministry of the Environment and Climate Change (MOECC)'s *Technical Guide to Renewable Energy Approvals* (MOECC 2017). **Table 1.1** summarizes the requirements of this report as specified under O. Reg. 359/09 and provides a cross-reference to where the information can be found in this report.

¹ The term "Project Location" is defined by O. Reg. 359/09 as: a part of land and all or part of any building or structure in, on or over which a person is engaging in or proposes to engage in the project and any air space in which a person is engaging in or proposes to engage in the project.

**STRONG BREEZE WIND PROJECT -
DECOMMISSIONING PLAN REPORT**

Introduction
July 26, 2017

Table 1.1: Decommissioning Plan Report Requirements (as per O. Reg. 359/09 – Table 1)

Requirements	Section Reference
Set out a description of plans for the decommissioning of the renewable energy generation facility, including the following:	
1. Procedures for dismantling or demolishing the facility.	3.1-3.2
2. Activities related to the restoration of any land and water negatively affected by the facility.	3.3
3. Procedures for managing excess materials and waste.	3.4

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STRONG BREEZE WIND PROJECT - DECOMMISSIONING PLAN REPORT

Probable Future Use of the Facility
July 26, 2017

2.0 PROBABLE FUTURE USE OF THE FACILITY

The Project is anticipated to have an operational lifespan of 20 or more years. At the end of the Project lifespan, the Project components are expected to be decommissioned as described in Section 3.0. If Project economics remain viable at that time, the facility could be “repowered” and continue operating for an extended period. Repowering may involve, for example, switching/updating generators with new equipment, replacing blades, and upgrading electrical equipment. The Proponent would engage the public, as appropriate and as required based on regulations and requirements in effect at the time of decommissioning, prior to incorporating substantial Project changes.

The proposed Project will be located on privately-owned agricultural lands and within municipal Right of Ways (ROWs). Following any repowering activities, at the end of the useful life of the Project, decommissioning activities would be implemented. The decommissioning and restoration process comprises removal of above-ground structures; removal of below-ground structures to a depth of approximately 1.0 m; and re-vegetation and seeding. The intent of decommissioning is to return the land to its pre-existing condition or better. Current Zoning and Official Plan designations for the properties on which Project Components are proposed are predominantly agricultural. As such, it is anticipated that the properties will be returned to a similar agricultural use after the termination of the project.

There is potential for the planned post-Project land use to change prior to actual decommissioning. The information in this Report will be updated, if required, in advance of decommissioning to represent the applicable conditions and regulatory requirements in effect at that time.

STRONG BREEZE WIND PROJECT - DECOMMISSIONING PLAN REPORT

Decommissioning
July 26, 2017

3.0 DECOMMISSIONING

At the end of the Project's useful life, the Project components are expected to be decommissioned as described below.

3.1 DECOMMISSIONING DURING CONSTRUCTION (ABANDONMENT OF PROJECT)

In the unlikely event that construction cannot be completed and decommissioning of the Project is required during the construction phase, restoration of lands to pre-construction conditions will follow the same procedure as for the decommissioning at the end of Project life, as described in the sections below.

The Proponent would assume responsibility for environmental protection. If the site has been cleared and/or excavated in preparation for installation of Project infrastructure, appropriate environmental protection measures would be implemented to prevent topsoil erosion and/or watercourse sedimentation. The extent of environmental protection measures required would depend on the progress made at the time of Project abandonment, and would be determined through site inspections by experienced professionals in their respective field including aquatic and terrestrial biologists and environmental engineers.

3.2 DECOMMISSIONING AFTER CEASING OPERATION

It is anticipated that the Project would have an operational lifespan of 20 or more years. The Project life could be further extended with proper maintenance, component replacement and repowering (see **Section 2.0**). For this section of the DPR, it is assumed that the Project will be decommissioned at the end of the 20-year power purchase agreement with the IESO, and prior to any substantial repowering efforts.

3.2.1 General Environmental Protection During Decommissioning

During all decommissioning and restoration activities, general environmental protection and mitigation measures would be implemented. Many activities during decommissioning would be comparable to the construction phase. As such, general mitigation measures and management practices that would be used, as appropriate, including erosion and sediment control, air quality and noise mitigation, and contingency plans for unexpected finds and spills, are provided in the Draft Construction Plan Report.

All decommissioning and restoration activities will be performed as per the requirements of relevant governing agencies, and will be in accordance with all relevant statutes in effect at the time of decommissioning.

STRONG BREEZE WIND PROJECT - DECOMMISSIONING PLAN REPORT

Decommissioning
July 26, 2017

3.2.2 Pre-Dismantling Activities

At the end of the Project's useful life, it will first be de-energized and isolated from all external electrical lines.

Turbine staging areas and crane pads would be delineated at each turbine prior to any dismantling or removal of equipment. All decommissioning activities would be conducted within this designated area, which includes ensuring that all vehicles and personnel stay within the demarcated areas.

Temporary erosion and sedimentation control measures will be implemented during the decommissioning phase of the Project. These measures will be installed and maintained to ensure proper functioning with consideration of industry best management practices. More detail on the erosion and sedimentation control measures are included in the Construction Plan Report.

3.2.3 Equipment Dismantling and Removal

The following sections describe the process that will be undertaken to remove the various components associated with the Project. Dismantling, removal, recycling and disposal will be in accordance with applicable regulation at the time and consistent with land owner agreements.

3.2.3.1 Turbines

The turbines can be disassembled into their original component parts. A crane would be used to carry out the reverse sequence of steps that occurred during construction (detailed throughout the Construction Plan Report), namely:

- Lowering hub and blades
- Lowering nacelle
- Decoupling and lowering the tower sections

Once the components are disassembled and at ground level (within the same staging areas beside each turbine as described in the Construction Plan Report), the materials will be broken down into manageable sizes to enable transport to various salvage facilities. The main sources of salvage material are concrete, steel, copper, fibreglass and plastic, which may be sold to recycling facilities. All non-salvageable components will be processed and safely transported to an MOECC approved disposal facility. See Section 3.4 for more information on waste removal.

STRONG BREEZE WIND PROJECT - DECOMMISSIONING PLAN REPORT

Decommissioning
July 26, 2017

3.2.3.2 Turbine Transformers

The small transformer associated with each turbine will be removed for reuse, reconditioning or disposal. The foundation associated with each transformer will likely be entirely removed as its depth will be less than 1.0m below grade.

3.2.3.3 Turbine Foundations

The turbine foundations will be partially removed to a depth of approximately 1.0m below grade. This depth enables normal agricultural practices to resume over the foundation areas following soil remediation. The concrete will be removed from the site by dump truck for disposal at an approved site.

3.2.3.4 Electrical System

Any above-ground transmission or collector lines and poles that are no longer being used by the local distribution system will be removed from the site and recycled, reused, or disposed of appropriately.

Underground collector lines on optioned properties would likely remain in place. The ends of the collector lines that come to the surface would be excavated and severed at approximately 1.0m below grade. Collector lines at a depth of greater than 1.0 m should not present a significant hazard to the environment or agricultural activities if left in place. Removal of the buried wires may result in disturbance to the environment and agricultural activities due to excavation. The final decision of whether to remove the cables from the ground or leave them in place will be made in consultation with the landowners.

Dependent on requirements for the municipality, underground collector and transmission lines buried within municipal road ROWs may be removed during decommissioning of the Project. If required, underground lines will be excavated, trenches backfilled with appropriate native or engineered material and sites restored to preconstruction condition.

The foundations of the transformer substation and ancillary equipment will be removed to a depth of 1.0m below grade to permit the site to return to its pre-Project land use. Transformer fluids and lubricants contained within the equipment will be drained and disposed of in accordance with applicable regulations. Steel, conductors, switches, and transformers will be reconditioned and reused, sold as scrap, recycled or disposed of at an approved facility.

As practicable, areas otherwise undisturbed but used by decommissioning equipment will be restored to a condition suitable for agricultural use or re-vegetation.

STRONG BREEZE WIND PROJECT - DECOMMISSIONING PLAN REPORT

Decommissioning
July 26, 2017

3.2.3.5 Operations and Maintenance Building

The operations and maintenance building would be dismantled as agreed to, or as necessary, in accordance with the land lease agreement. The fencing would be removed, and the concrete foundation would be removed to approximately 1.0m below grade or completely removed. All granular and geotextile materials would be removed from the site to an approved location by dump truck. All electrical system components would be taken off-site by truck and reused, recycled or disposed of at an approved facility.

3.2.3.6 Turbine Laydown/Staging Areas and Crane Pads

During turbine dismantling a temporary laydown/staging area and orientation like that needed for construction would be used for the crane pad, storage of the turbine components, parking, and the foundation spoil pile. This area would be prepared in the same manner as described in the Construction Plan Report and would be restored to pre-existing conditions at the end of the decommissioning phase.

3.2.3.7 Access Roads

To facilitate the disassembly of the turbines, temporary access roads may be installed at entrances from municipal roads, temporary truck turnarounds may be installed to allow for safe entry by trucks, and existing access roads may be upgraded with geotextile or aggregate material if deemed necessary. The location of these accesses and construction techniques would be the same as those detailed in the Construction Plan Report.

After the dismantling and removal of the turbine components, access roads, truck turnarounds and widened entrances would be removed. All granular and geotextile materials would be excavated and removed by dump truck and disposed of at an approved location. Subject to individual land owner agreements and appropriate regulatory approvals (if required) access roads or portions of access roads, and/or construction material may be left in place.

Culverts would be removed if requested by the landowner. Such removal will be done in accordance to conditions from the municipality, LTVCA and/or the Department of Fisheries and Oceans (DFO).

3.3 SITE REHABILITATION/RESTORATION

Most of the lands within the Project Location are currently used for agricultural purposes with a smaller amount of land that is forested or wetland. If at the time of decommissioning the lands used for the Project will revert to their current use a Rehabilitation Plan will be designed to restore lands affected by the Project to a state suitable for this use.

STRONG BREEZE WIND PROJECT - DECOMMISSIONING PLAN REPORT

Decommissioning
July 26, 2017

The Rehabilitation Plan will be prepared prior to decommissioning and should include (or update) the information detailed below.

3.3.1 Agricultural Lands

Agricultural lands that have become compacted due to facility operation or decommissioning activities (e.g., where access roads and crane dismantling pads are located) should be de-compacted using suitable equipment.

Minor regrading may be required to even out the land surface. The grading should be done in a way that will not impact the flow of surface water to natural features, water bodies and Lower Thames Valley Conservation (LTVCA) regulated areas.

Any artificial agricultural drainage damaged during decommissioning would be repaired by a drainage contractor.

Topsoil would be added to similar depth as surrounding areas, where necessary. Imported topsoil would be of the same or similar soil type and texture as pre-construction conditions and/or adjacent lands and would be selected with input from the landowner. Soil would be inspected and/or tested prior to importation to prevent transmission of agricultural pests to the property.

3.3.2 Water Bodies

Any proposed decommissioning works within or near watercourses will implement the mitigation and monitoring measures used during construction as described in the Construction Plan Report. Site-specific mitigation requirements determined during the detailed design and permitting process will also be applied. Standard construction practices at the time of decommissioning should include erosion and sediment control measures to mitigate potential impacts to water bodies.

Decommissioning activities will be discussed with the LTVCA as necessary, to determine applicable current guidelines, permitting, site-specific mitigation, and/or remediation plans that apply at the time of decommissioning.

3.3.3 Storm Water Management

If any Storm water management facilities were constructed for the operations and maintenance building and substation these may be left in place subject to landowner agreement. If grading is required to remove/infill the pond, it should be done in a way that will not impact the flow of surface water to natural features, water bodies and nearby regulated areas. Temporary storm water management measures, like those used during construction, will be employed during decommissioning to mitigate potential erosion and sedimentation.

STRONG BREEZE WIND PROJECT - DECOMMISSIONING PLAN REPORT

Decommissioning
July 26, 2017

3.3.4 Municipal Road Allowances

Electrical lines located either above- or below-ground in the municipal ROW will be removed in consultation with the Municipality, County, and LTVCA, as applicable. Should any of the municipal road allowances be disturbed during decommissioning activities, they will be restored. It is expected that conduits directionally drilled under Highway 401 for the electrical lines will be cut below grade, capped, and left in place.

3.3.1 Natural and Forested Lands

Pre-construction lands that were naturally vegetated (e.g., buffer areas to ploughed fields) will be revegetated in consultation with landowners using native plant material and seeds that are appropriate for the Project Location or the land will be allowed to revegetate naturally. Where Project infrastructure has been removed and disturbed areas require quick seeding to prevent topsoil erosion, quick growing native species will be used. The seed mixture will be determined at in consultation with the landowners. Erosion and sediment control measures will be installed at ditches and will be left in place until ground cover is fully established.

3.3.2 Spills

In the very unlikely event that small spills occur during decommissioning, site restoration may be required. Mitigation and clean up measures for spills are described in the [Construction Plan Report](#).

Hazardous materials or wastes will not be stored on-site during decommissioning of the Project. Should a spill occur that requires remediation of lands, this will be done in compliance with applicable regulations and in consultation with the MOECC to restore the lands to their pre-construction condition.

3.4 MANAGING EXCESS MATERIALS & WASTE

Prior to dismantling and demolition of the Project, SBWPP or the Project operator would complete a waste audit of the materials to be handled and prepare a waste reduction work plan in accordance with *A Guide to Waste Audits and Waste Reduction Work Plans for Construction & Demolition Projects*, as required under Ontario Regulation 102/94 (O. Reg.102/94), as amended or other applicable regulation that is in place at the time of decommissioning. All wastes would be managed in accordance with *Ontario Regulation 347, General – Waste Management* (O. Reg.347) and with reference to *Ontario Provincial Standard Specification 180 - General Specification for The Management of Excess Materials* (OPSS 180), or relevant regulations and specifications in effect at that time.

Typical waste materials and modes of disposal, recycling or reuse are presented in **Table 3.1** below:

**STRONG BREEZE WIND PROJECT -
DECOMMISSIONING PLAN REPORT**

Decommissioning
July 26, 2017

Table 3.1: Typical Facility Decommissioning Waste Materials and Modes of Disposal

Component	Typical Mode of Disposal
Turbine blades	Cut and dispose in regulated landfill
Turbine Towers (concrete sections)	Crush and recycle as granular material
Turbine Towers (steel sections)	Recycle
Generators and gearboxes	Salvage for reuse or recycle for scrap
Nacelle	Salvage for reuse or recycle for scrap
Concrete foundations	Remove section, crush and recycle as granular material
Cabling	Recycle
Transformers and switchgear	Salvage for reuse, reconditioning or recycle for scrap
Granular materials (roads, tower sites, etc.)	Reuse or dispose in landfill
Oils/Lubricants	Recycle or disposal
Hazardous materials	Dispose through licensed hauler and disposal/treatment facility
Geotextile material	Dispose in a licensed landfill
Miscellaneous and non-recyclable materials	Dispose in a licensed landfill

Major pieces of equipment may be recyclable or reusable. Electrical equipment could either be salvaged for reuse or recycled. Components, such as the generators and cabling, would have a high resale value due to copper and aluminum content. Concrete from footings and tower sections could be crushed and recycled as granular fill material. Spent liquids could be recovered for recycling through existing reprocessing companies.

As much of the facility would consist of reusable or recyclable materials, there would be minimal residual waste for disposal as a result of decommissioning the Project. Small amounts of registerable, hazardous waste materials (i.e., material where leachate concentration exceeds 100 times the values given in Schedule 4 of the Regulation 558 under *Environmental Protection Act* of Ontario) would be managed in accordance with O. Reg. 347 or subsequent applicable legislation. Residual non-hazardous wastes would be disposed of at a licensed landfill in operation at the time of decommissioning.

STRONG BREEZE WIND PROJECT - DECOMMISSIONING PLAN REPORT

Decommissioning Notification and Communications
July 26, 2017

4.0 DECOMMISSIONING NOTIFICATION AND COMMUNICATIONS

Advance notification of decommissioning will be provided to the Municipality of Dutton Dunwich, the County of Elgin, Aboriginal communities, the LTVCA, other government agencies and the public. Notification may be in the form of letters, newspaper notices, phone calls and/or updates on the Project website. The Decommissioning Plan Report will be reviewed and updated as needed at least 6 months prior to the Project's retirement date, and if changes are required, a revised report will be provided to the MOECC.

The Emergency Response and Communications Plans (ERCP) detailed in the Design & Operations Report will be updated and used during the decommissioning of the Project. These plans include methods for informing the public, municipalities, Aboriginal communities, nearby landowners, other stakeholders, and relevant agencies about activities occurring at the Project site (from standard decommissioning activities to emergencies). The plans will also include contact information for the Proponent and/or general contractor responsible for decommissioning, methods for registering complaints, recording how complaints are managed, and methods for reporting spills to the MOECC. The Decommissioning Plan Report and/or ERCP will be updated prior to decommissioning with any additional notification and communication plans applicable at the time.

**STRONG BREEZE WIND PROJECT -
DECOMMISSIONING PLAN REPORT**

Other Approvals
July 26, 2017

5.0 OTHER APPROVALS

The Proponent would obtain authorizations, permits and approvals required at the time of decommissioning from the appropriate government and regulatory agencies/bodies. Authorizations, permits, and approvals that may be required at the time of decommissioning are provided in Table 5-1.

Table 5.1: Potential Decommissioning Permits and Approvals

Administering Agency	Permit / Approval	Rationale
MUNICIPAL		
County of Elgin	Road User Agreement	For use of municipal road allowances for electrical line siting, surveys and traffic management.
	Road Occupancy Permit	Required for changes, improvements, or crossings for a municipal drain.
	Road Cut Permit	May be required for works to county roads.
Municipality of Dutton Dunwich	Demolition Permit	Demolition/Removal of operations and maintenance building.
	Transportation Plan	To adhere to road safety and suitability.
PROVINCIAL		
LTVCA	Development, Interference with Wetlands, and Alterations to Shorelines and Watercourses Permit	Work within floodplains, watercourse crossings, river or stream valleys, hazardous lands and within or adjacent to wetlands.
MOECC	Record of Site Condition	A change of property use and/or ownership.
Ministry of Labour	Notice of Project	Notify the Ministry of Labour before decommissioning begins.
Ministry of Transportation	Special Vehicle Configuration Permit	Use of non-standard vehicles to transport large components.
	Transportation Plan	Adherence to road safety and suitability.
	Highway Entrance Permit	Interference or obstruction of the highway.
	Change of Access and Heavy/Oversize Load Transportation Permit	Compliance with provincial highway traffic and road safety regulations.
	Wide or Excess Load Permit	Transportation of large or heavy items on provincial highways.

STRONG BREEZE WIND PROJECT - DECOMMISSIONING PLAN REPORT

Sign-Off Page
July 26, 2017

6.0 SIGN-OFF PAGE

This document entitled Strong Breeze Wind Project -Decommissioning Plan Report was prepared by Stantec Consulting Ltd. ("Stantec") for the account of Strong Breeze Wind Power Partnership (the "Client") to support the approvals and permitting process for the Client's application for a Renewable Energy Approval for the Strong Breeze Wind Project in the Municipality of Dutton Dunwich, within Elgin County, Ontario. In connection thereto, this document may be reviewed and used by the federal, provincial and municipal government agencies participating in the approvals and permitting process in the normal course of their duties; and stakeholders may provide comment as part of the regulatory approvals process. Except as set forth in the previous sentence, any reliance on this document by any third party for any other purpose is strictly prohibited. The material in it reflects Stantec's professional judgment in light of the scope, schedule and other limitations stated in the document and in the contract between Stantec and the Client. The opinions in the document are based on conditions and information existing at the time the document was published and do not take into account any subsequent changes. In preparing the document, Stantec did not verify information supplied to it by others, unless otherwise stated therein. Any unauthorized use which a third party makes of this document is the responsibility of such third party. Such third party agrees that Stantec shall not be responsible for costs or damages of any kind, if any, suffered by it or any other third party as a result of decisions made or actions taken based on unauthorized use of this document.

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STRONG BREEZE WIND PROJECT - DECOMMISSIONING PLAN REPORT

References
July 26, 2017

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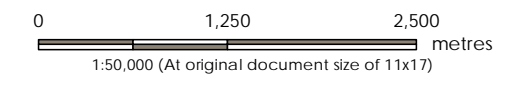
Ontario Provincial Standard Specification (OPSS). 2011. Ontario Provincial Standard Specification 180 - General Specification for The Management of Excess Materials. Last revised: November 2011.

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**APPENDIX A:
PROJECT LOCATION**

Legend

- Project Location
- 300 m from the Project Location
- Expressway / Highway
- Major Road
- Minor Road
- Existing Hydro Line
- Property Boundary
- Lot
- Municipal Boundary - Lower Tier



- Notes
1. Coordinate System: NAD 1983 UTM Zone 18N
 2. Base features produced under license with the Ontario Ministry of Natural Resources and Forestry © Queen's Printer for Ontario, 2016.
 3. Orthoimagery © First Base Solutions, 2016. Imagery Date, 2010.



Project Location 160950885 REVA
 Municipality of Dutton Dunwich and Prepared by BCC on 2017-05-10
 County of Elgin Technical Review by ## on 2017-##-##
 Independent Review by ## on 2017-##-##

Client/Project
STRONG BREEZE WIND POWER PARTNERSHIP
STRONG BREEZE WIND PROJECT

Figure No.

1

Title

Project Location

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