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Facility closure refers to a ceasing of the Unit 3 Repower Project operations either temporarily or permanently. Temporary closure is a temporary shutdown for extended periods. This does not include outages for normal maintenance. Temporary closure can be caused by major equipment overhaul/replacement or by significant disruptions to the natural gas supply, water supply, or electric transmission delivery systems. Temporary closures can also be a result of significant damage to the Unit 3 Repower Project due to various events (earthquake, fire, flood, equipment failures, etc.). Permanent closure is a long-term permanent cessation of operations where there are no plans for re-commissioning the Project. A permanent closure could be due to significant damage that is deemed to be economically or physically beyond repair, due to age of the Project equipment, unfavorable market conditions, etc. Temporary and permanent closures are discussed in more detail below.

Temporary closures can be divided into two categories: (1) closures due to the spill/release of hazardous materials, and (2) those NOT due to the spill/release of hazardous materials.

5.1 TEMPORARY FACILITY CLOSURE

Temporary closures due to an actual spill/release or a threatened spill/release of hazardous materials will follow the Hazardous Material Business Plan (HMBP) developed for the ECGS, including the Project Site. The procedures outlined in the plan will include methods to control and contain the spill/release, proper response from trained plant personnel, notification of the proper authorities and the public, and clean up/mitigation procedures for the spill/release. After these steps are completed, temporary closure of the Project will proceed as described below for a temporary closure NOT due to the spill/release of hazardous materials.

Temporary closures NOT due to the spill/release of hazardous materials can include closure caused by major equipment overhaul/replacement, by significant disruptions to the major utilities (natural gas, water, or electric transmission delivery systems), and by significant damage to the Project due to various events (earthquake, fire, flood, equipment failures, etc.). For these types of temporary closures, additional security will be added as needed. A plan will be implemented for proper cessation of operations. The plan will ensure conformance with applicable LORS and ensure the protection of public health and safety and protection of the environment. Depending upon the length of the temporary closure and the expected ambient temperatures, the plan may include draining of water-based systems, draining of chemicals, N₂ purge of equipment, and safe shutdown/lay-up of equipment. All water and chemicals drained will be disposed of in accordance with the applicable LORS.

5.2 PERMANENT FACILITY CLOSURE

Permanent closure could be due to significant damage that is deemed to be economically or physically beyond repair, due to Project age, unfavorable market conditions, etc. Although the Unit 3 Repower Project is designed for a 30-year life, the actual life may be less than or more than 30 years, depending upon many factors such as premature equipment failure, aging of equipment, level of maintenance performed, cost of maintenance and operation, fuel pricing, etc.

Permanent closure of the Project may range from abandoning in-place to removal of all equipment and systems from the Project Site, dependent upon the conditions at that time and the intended future use of the Project Site. Since this information is unknown and highly variable, a

specific procedure/plan (decommissioning plan) will be developed and submitted to CEC, Imperial County, and City of El Centro when the situation and timing becomes known. The plan will ensure conformance with applicable LORS and ensure the protection of public health and safety and protection of the environment.

At a minimum, the decommissioning plan for the Project will contain the following items:

- Proposed decommissioning activities for the equipment and systems associated with the Project
- Conformance of the decommissioning plan to applicable LORS
- Plan for permanent site conditions and maintenance
- Estimated costs for the proposed decommissioning including the source of the funds to be used for decommissioning

The decommissioning plan may include recycling of equipment and materials from the Project. If possible, unused chemicals and oils will be sold or given back to the suppliers or to other users. Used chemicals and oils, along with all hazardous and non-hazardous wastes, will be collected and disposed of in accordance with applicable LORS in appropriate landfills or waste collection facilities if they cannot be recycled. Equipment containing chemicals and oils will be drained and shut down to ensure public health and safety and to protect the environment. Site security will be maintained during the decommissioning period as needed.