Appendix T

HEALTH, SAFETY AND NOISE PLAN

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Easley Renewable Energy Project

Prepared for

Intersect Power

IP Easley, LLC

a subsidiary of Intersect Power, LLC

Submitted by

Aspen environmental group

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1. INTRODUCTION

IP Easley, LLC is committed to the safety and health of all workers and contract personnel and visitors to IP Easley Renewable Energy Project sites and work locations. All managers, supervisors, and contractors would be held accountable for the health and safety of all workers under their supervision and would consistently work to correct or eliminate workplace hazards that can cause accidents and injuries. Managers, supervisors, and contractors are responsible to ensure that Project sites, work and office locations, machinery, and equipment are safe and that all workers work in compliance with established safe work practices and procedures.

All workers and contract personnel would be responsible and expected to protect their own health and safety by working in compliance with appropriate Occupational Health and Safety legislation and applicable regulations and standards, as well as the provisions of the health and safety program described herein and following safe work procedures. All personnel and associates would exercise responsibility and care in the prevention of illness and injury to themselves and to others. All personnel and associates are encouraged to establish and maintain high standards of health and safety and to demonstrate that commitment by personal example.

The Health and Safety Plan, described in more detail in Section 4, is comprised of (among other items) the:

- Project Safety Plan,
- Emergency Response Plan,
- Worker Education and Awareness Program, and
- Monthly Safety and Health Reports.

The Noise Plan is addressed in Section 5.

2. OBJECTIVE

The Construction Contractor(s) would be responsible for preparing and implementing a Health and Safety Plan in compliance with all local, state, and federal regulations pertaining to health and safety. The purpose of the Plan is to provide a description of measures that would be implemented in order to minimize safety-related situations that could occur and provide procedures to assist in the protection of workers and the public during the construction and operation of the Easley Renewable Energy Project (Project). IP Easley, LLC, (Proponent) has developed this Plan as part of the Plan of Development (POD) that accompanies its application to the Bureau of Land Management (BLM) seeking a right-of-way (ROW) grant for the solar facility, battery energy storage system (BESS), and gen-tie line. The Plan provides guidance to contractors and field personnel on measures to minimize effects during construction and operations activities associated with the Project.

The following text includes standard language regarding health and safety. These measures may be modified in the final POD to include measures specifically designed for the Project. The following is intended to be an overview of the Proponent or its contractors' safety and health requirements and is not intended to be a comprehensive or exhaustive list. It is not intended to supersede or replace the contractors' obligations to comply with (and ensure Contractor Representatives comply with) all applicable laws; all reasonable directions and orders given by the Proponent's representatives; and all other guidelines, rules, and procedures that may be given to contractors from time to time, including without limitation, safety and health standards, policies, and procedures resulting from a pre-job risk assessment, amendments by the Proponent or amendments resulting from changes in applicable laws.

The management practices and activities in the Health and Safety Plan are intended to accomplish the following objectives:

- Educate workers on the hazards associated with the Project and how to identify them; the safety measures that must be taken to prevent injury; how to identify potentially contaminated soils and/or groundwater; and the procedures for ensuring personnel receive necessary training.
- Identify federal and state occupational standards regarding occupational safety and safe work practices.
- Establish fire safety evacuation procedures.
- Explain the appropriate response actions for each safety hazard and develop and describe the procedures and mechanisms for responding to and reporting serious accidents to appropriate agencies and for notifying the appropriate authorities of safety issues.
- Identify requirements for temporary fencing around structure areas, staging areas, storage yards, and excavation areas during construction or decommissioning activities, as well as appropriate measures to be taken during construction of the Project to limit public access to hazardous components.
- Designate environmental field representative(s) to be on site to observe, enforce, and document adherence to this Health and Safety Plan.
- Identify where medical kits are located.

3. PROJECT DESCRIPTION

IP Easley, LLC (Applicant or Proponent), a subsidiary of Intersect Power, LLC, proposes to construct, operate and decommission the Easley Renewable Energy Project (Easley or Project), a utility-scale solar photovoltaic (PV) electrical generating and storage facility, and associated infrastructure to generate and deliver renewable electricity to the statewide electricity transmission grid.

The proposed Project application area is located on approximately 3,735 acres of private and BLM-administered land, in Riverside County north of Desert Center, California. The Project would generate and store up to 650 megawatts (MW) of renewable electricity via arrays of solar photovoltaic (PV) panels, battery energy storage system (BESS), and appurtenant facilities. A 6.7-mile 500 kilovolt (kV) generation-tie (gen-tie) line would mainly traverse across the Oberon Project site and connect into an approved substation that is under construction on the approved Oberon Renewable Energy Project site, an adjacent solar and energy storage facility owned by Intersect Power. From the Oberon onsite substation, the power generated by the Easley Project would be transmitted to the SCE Red Bluff Substation via the Oberon 500 kV gen-tie line, which is expected to be online by the end of 2023.

The public lands within the Project solar application area are lands designated as Development Focus Area (DFA) by the Desert Renewable Energy Conservation Plan (DRECP) and associated Record of Decision (ROD), and thus, have been targeted for renewable energy development. Because the proposed Project is partially located on federal land under management of the U.S. Bureau of Land Management (BLM), the BLM is the lead agency under the National Environmental Policy Act (NEPA), 42 U.S.C. section 4321 et seq.

Depending on the timing of the interconnection agreement, the Easley Project could be online as early as late 2025. The Project would operate for a minimum of 35 years and up to 50 or more years. At the end of its useful life, the Project would be decommissioned, and the land returned to its pre-Project conditions.

4. HEALTH AND SAFETY PLAN

4.1. Regulatory Compliance

IP Easley, LLC (or the Project operator at the time) would comply with all applicable federal, state, and local occupational safety and health laws, regulations, and standards. The Project operator using prior judgment, experience, and knowledge would identify such additional health and safety measures as may be required for work to be performed safely.

4.2. Safety and Occupational Health Supervisor

Before on-site services begin, the Project operator would ensure that the contractor(s) assign a designated safety and occupational health supervisor, qualified by experience and/or education, for all services taking place. The safety and occupational health supervisor would manage implementation of the practices and activities in the Health and Safety Plan and may have additional functions provided the supervisor does not interfere with the effective implementation of the Project. The contact number for the designated safety and health supervisor would be posted onsite for personnel. The roles, responsibilities, and contact information of the designated safety and health supervisor would be included in the worker education and awareness program (WEAP) training.

4.3. Competent and Qualified Persons

The Project operator would ensure contractor(s) employ a "competent person" and/or "qualified person" capable of identifying unsafe hazards. Such person(s) would have the authority to take prompt corrective measures to correct such hazards and carry out the responsibilities of a "competent" and/or "qualified" person as required by applicable Occupational Safety and Health Administration (OSHA) standards. Contractor(s) would provide the Project operator with the name and contact information of the assigned person(s) and/or any changes in the assignment.

4.4. Job Safety Analysis

Before on-site services begin, contractor(s) would complete a job safety analysis to identify occupational safety and health hazards associated with the services to be provided. For each identified hazard, hazard controls must be specified and implemented. A hazard analysis defining the required personal protective equipment for the services would also be completed in accordance with OSHA standards and other applicable federal, state, and local occupational safety and health laws, regulations, and standards. The job safety analysis would be used to establish the scope of the subsequent components of the Health and Safety Plan.

4.5. Project Safety Plan

The Project operator would ensure contractor(s) develop a Project Safety Plan (PSP) once construction specifics are known that describes how the contractor would safely provide the contractor's services. The content of the plan would address regulatory compliance, OSHA standards, and any additional health and safety measures as may be required for the contractor's services to be performed safely. The PSP would address site specific health and safety measures, relevant contact information, and reporting.

The PSP would also ensure compliance with the applicable health and safety measures found within any applicable Project mitigation measures.

In addition, the PSP will specifically address the 2019 coronavirus disease (COVID-19). A vaccine to prevent serious illness and hospitalization is available for COVID-19. The best way to prevent illness is to avoid being exposed to the virus. Therefore, the PSP will discuss the Project-specific preventative requirements for safe work practices and cleaning that would be consistent with federal, State, and local guidelines to minimize risk of exposure. The PSP will also discuss strict protocols to follow in the event that Contractor(s) or Operator personnel shows symptoms of the virus, tests positive, or has been in contact with someone who has tested positive for COVID-19.

4.6. Emergency Response Plan

Contractor(s) would develop a written Emergency Response Plan (ERP) in accordance with OSHA standards and other applicable federal, state, and local occupational safety and health laws, regulations, and standards. Contractor(s) would include the ERP within contractor's PSP. Contractor(s) would train all contractor representatives on the provisions of the ERP, which would be consistent with applicable laws and regulations governing such emergencies.

The resources and coordination required for response to a specific hazard or emergency is determined by type, severity, location, and duration of the event. Most events require management at the field operations level and would require increasing resource requirements to match the severity and duration of the event. This emergency management organization would be included as part of the ERP and would provide increasing levels of resources and the coordination necessary to support immediate or escalating emergency events.

In the event of an emergency, crews would be dispatched quickly to repair or replace any damaged equipment. Public health and safety and the health and safety of workers would have priority under emergency conditions. Repair of the transmission line and restoration of electric service is a public health and safety concern and would proceed as rapidly as possible under the circumstances. All reasonable efforts would be made to protect plants, wildlife, and other resources. Reclamation procedures following completion of repair work would be similar to those prescribed during construction.

4.7. Worker Education and Awareness Program (WEAP)

As part of the PSP, the designated health and safety supervisor would coordinate with the environmental monitor to ensure the implementation of the health, safety, and WEAP programs to properly communicate the necessity of compliance with the Project's mitigation measures and general site safety requirements for all personnel. The safety of personnel is a top priority of the construction, operations, and contractor management staff. Required staff training would include environmental, cultural, health, and safety training, in part through the Project's WEAP. The designated health and safety supervisor, with input from the environmental monitor, would prepare a PowerPoint Presentation that all construction personnel must review prior to the commencement of construction. This format is effective in the field and, once printed in hard copy, serves as the on-site training for personnel that may later join the job site. All employees and or contractors would be required to sign a form stating they have completed environmental training for the Project. Each individual that successfully completes training would be issued an environmental training hardhat sticker and would be required to display this sticker throughout construction activities. As new personnel come on-site throughout the various stages of the Project, the training would be initiated and the records (signed forms) updated and submitted to the BLM. Annual familiarity training would be conducted with the local authorities, including police and fire departments, as appropriate. Annual First Aid and CPR training would also be conducted.

During both construction and operation, there would be continuing training conducted for all facility personnel on current industry issues as well as new changes to safety equipment and procedures. The

construction, operations, and contractor management staff would work to implement safety recommendations and assist in conducting site inspections.

4.8. Monthly Safety and Health Reports

Within five (5) working days of the end of each calendar month or after all services are performed, contractor(s) would provide IP Easley, LLC with a written report containing the following information:

- Number of first aid injuries, and
- Number of OSHA recordable injuries.

5. NOISE PLAN

During construction, construction vehicles would create some noise, although much of the noise would be limited to the short period of time when earthwork is taking place. Noise generated by the Project would consist of: (1) short duration sounds resulting from construction activities, and (2) sound during normal facility operations. Received sound levels would fluctuate, depending on the construction activity, equipment type, and distance between the noise source and receiver. Otherwise, the primary noise source of vehicles would be delivery trucks. The Project would be subject to mitigation measures during construction designed to limit noise at sensitive receptors and ensure that construction noise complies with local regulations

During operations, some of the gen-tie lines would introduce a long-term source of noise related to the audible corona effect of the 500 kV line, which occurs with normal and routine operation. Corona noise from the Project transmission line would occur in the same corridor as other existing transmission lines. The Project gen-tie lines on BLM-administered land would be subject to any noise mitigation measures presented in the Environmental Assessment.

In addition, the following protection measures for noise would be implemented during construction and operations and maintenance:

- Construction vehicles and equipment would be maintained in proper operating condition and would be equipped with manufacturers' standard noise control devices or better (e.g., mufflers, engine enclosures). Improperly functioning equipment would be fixed and or removed from the construction site until the issue is corrected.
- Noise associated with construction and operations activities shall comply with applicable noise restrictions.
- The Project would comply with Riverside County Noise Ordinance Number 847 to protect the noise-sensitive receptors near the Project site. The maximum decibel level standards depend on the receiving land use, such that sound levels in a low-density "Rural Community" shall not exceed 55 dBA Lmax during the daytime hours (7:00 a.m. to 10:00 p.m.) or 45 dBA Lmax during the nighttime hours (10:00 p.m. to 7:00 a.m.). Exceptions to the noise standards can be requested for construction-related reasons. Section 2 of Ordinance No. 847 specifies that the following construction activities are exempt from the provisions of the noise ordinance:
  - Private construction projects located 0.25 mile or more from the nearest inhabited dwelling; and
  - Private construction projects located within 0.25 mile of an inhabited dwelling provided that construction activities are limited to 6:00 a.m. to 6:00 p.m. during the months of June through September and are limited to 7:00 a.m. to 6:00 p.m. during the months of October through May.

- The Applicant has voluntarily committed to implement APM NOISE-1, which states that the Applicant will make best efforts to avoid or minimize use of any impact hammer for pile driving or other equipment similarly capable of producing disruptive noise during construction activities within a one-mile radius from the residential parcel on the northeast corner of the Lake Tamarisk Desert Resort community during the winter months of highest residency (November 1 to March 31). If based on the final construction schedule, use of such equipment is necessary within this geographic area during the aforementioned time period, the Applicant will make best efforts to avoid or minimize this construction activity prior to 7:00 am and after 6:00 pm. The Applicant will also avoid nighttime equipment deliveries between 10:00pm and 7:00am.
- The Project would comply with any additional CEQA and NEPA noise mitigation measures, such as those that would implement construction schedule restrictions, public notification requirements, and/or a public complaint process.