



DEPARTMENT OF THE NAVY
JOINT BASE PEARL HARBOR-HICKAM
850 TICONDEROGA ST STE 100
JBPBH HI 96860-5102

5000
Ser JB4/869
30 September 19

Ms. Nicola Park
Clearway Energy Group
100 California Street, Floor 4
San Francisco, CA 94111

Dear Ms. Park:

SUBJECT: WAIAWA SOLAR FARM PROJECT – CLEARWAY ENERGY GROUP

We met with you on March 5, 2019, and have reviewed your letter dated July 22, 2019, including enclosures, regarding the proposed solar farm development and its proximity to our Waiawa Pumping Station's Zone of Contribution ("ZOC"). Based on the information provided, the Navy is, in general, supportive of the effort to supply clean, renewable energy for the Island of Oahu by locating a 36 MW solar farm, with a maximum solar footprint of 180 acres, on approximately 200 acres of non-federal properties within the ZOC.

The project information your team has provided to the Navy to date presents an acceptable approach towards protecting against contamination of groundwater within the Waiawa Pumping Station's ZOC. We note that the solar panels will be cleaned with water only (no chemicals), no lubricants will be used in the trackers, inverters and medium voltage transformers, and that oil coolant for high voltage transformers will not contain any hazardous substances. We understand that transformers will be equipped with spill containment areas, and will be designed and managed in accordance with state and federal hazardous material waste regulations. We note that the batteries for the project will be lithium-ion, will not contain any liquids, and will be housed in a steel containment. We understand that grass/vegetation will be controlled by regular mowing; chemicals, herbicides and animals will not be utilized. We note that fire suppression systems for this project will not involve water, but would instead utilize FM 200 NOVEC 1230, or a similar product, which turns to gas upon contact with the air, and is not a firefighting foam.

If material changes are made to the project, in particular, the contamination mitigation measures, the Navy should be notified.

It is imperative that sufficient mitigation measures be considered, implemented, and assessed throughout the lifecycle (design, construction, operation, decommissioning, etc.) of this project to prevent contamination of the Waiawa groundwater source. Should any spills or other unforeseen events occur that could threaten groundwater quality, Clearway Energy Group must take action to minimize impacts to the surrounding environment, and more importantly prevent contamination of the groundwater source.

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The Waiawa pumping station supplies clean, potable water to the Joint Base Pearl Harbor water system, and is an invaluable resource. In order to preserve this resource, we are relying on your organization's commitment to mitigate risk of contamination and to address any actual or threatened release of contaminants. We appreciate your consideration and partnership in support of our requirement and Navy mission. Please continue to keep us informed as the planning and development of this project progresses.

If you have any other questions, my point of contact is Mr. David Sullivan, Environmental Compliance Branch Head, Joint Base Pearl Harbor-Hickam, who can be reached at 449-3184 or at david.m.sullivan1@navy.mil.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. E. Harmeyer". To the right of the signature, the letters "JB4" are handwritten.

R. E. HARMEYER
CAPT, CEC, U.S. Navy
By direction

Copy to:
PRJ6
NAVFAC HI/PW