

PLC-ARMOUR-P2738-001-TPR-Disposition Response Letter-1

<https://plcfiresafety.sharepoint.com/sites/Projects/Shared Documents/ACTIVE PROJECTS/P2738-HA-Armour Township-FHA-ON/-001 TPR Hazard Mitigation/Deliverables/Rev /PLC-ARMOUR-P2738-001-TPR-Disposition Response Letter-1.docx>

November 5, 2025

Ms. Charlene Watt
Township of Armour
PO Box 533, 56 Ontario Street
Burk's Falls, Ontario

RECEIVED
NOVEMBER 6, 2025
TOWNSHIP OF ARMOUR

Dear Ms. Watt:

Subject: Project 903 Battery Energy Storage System – Response to Dispositions

PLC Fire Safety Engineering (PLC) has completed a review of the responses to the Third-Party Review (TPR) of the Hazard Mitigation Analysis Report for the above-captioned project. The original review, documented in report # PLC-ARMOUR-P2738-001-TPR-C, dated May 15, 2025, identified nine (9) clarification items.

Further responses to our clarification items (dated June 5th, 2025), resulted in four (4) items being satisfactorily addressed and closed. The remaining five (5) items required additional information. Another round of responses was provided for the remaining five (5) items (dated August 12th, 2025). PLC has determined that three (3) items have been satisfactorily addressed and are now considered closed. The remaining two (2) items required additional information.

Following email correspondence (dated October 22nd, 2025), PLC determined that the remaining two (2) items have been satisfactorily addressed and are now considered closed. **All clarification items have now been addressed and are considered closed.**

Please find enclosed PLC's response addressing the two (2) clarification items that remained outstanding, and associated emails.

Prepared by,

Reviewed by,



Gary Chan, P.Eng.

Technical Specialist



Mohamed Mushantat, P.Eng., M.Eng.

Senior Fire Protection Engineer

DISPOSITION OF FINDINGS

NO.	REVIEWER COMMENT	DESIGN DISPOSITION	REVIEWER CONCURRENCE
4	HMA Report Section 5.4.3 states that the requirements of NFPA 1142 apply. Clarify what are the relevant requirements, and whether they are met for this site. <i>Reference: NFPA 855 Subsection 4.9.4</i>	FRA Response [06-05-2025]: <i>Added the clarification to Section 4.1.6 that the water supply requirements can be relaxed with agreement between AHJ and site owner as listed in NFPA 855 Section 9.5.2.5.</i> FRA Response [08-12-2025]: <i>The reference to alternative fire suppression system was made in error and corrected.</i> FRA Response [10-22-2025]: <i>The agreement with the AHJ, resulting from an in-person meeting at the Township of Armour office on Nov 26, 2024, was the installation of a dry hydrant at a location of their choosing which was added to the HMA. See below and attached additional details in this regard.</i>	PLC Response [07-24-2025]: Section 5.4.3 of the updated report states that: <i>"The ERP recommends alternate methods of suppression that do not rely on water. As such, the Project 903 BESS site design complies with the NFPA 855 water supply requirements".</i> Clarify or explain what is the alternate fire suppression system that is being proposed and how it complies with NFPA 855 requirements. PLC Response [08-25-2025]: It is acknowledged that no alternative fire suppression is proposed. As noted, Section 9.5.2.5 of NFPA 855 does permit fire suppression system and water supply requirements to be relaxed if there's agreement between AHJ and site owner. No details on an agreement with the AHJ have been provided. Please clarify. PLC Response [11-03-2025]: Based off the information provided, we have calculated that there is an adequate water supply to maintain fire ground operations for an extended period. Therefore, it is our opinion that the proposed firefighting approach is reasonable, and we do not identify any technical concerns that would preclude acceptance. That said, as the relaxation permitted by Section 9.5.2.5 of NFPA 855 requires approval by the AHJ. Provided the AHJ is comfortable with this rationale, we have no objection to its approval and will close this item. Disposition accepted. Item closed.

5	HMA Report Section 4.1.5 states that a dry hydrant is being proposed. Confirm the details regarding its location and what standard it is to comply with.	FRA Response [06-05-2025]: <i>Added details to Section 4.1.5 for the location of the dry hydrant.</i> Section 4.1.5 of the HMA report indicates that the hydrant is located at 1014 Ferguson Rd. FRA Response [08-12-2025]: <i>The distance to the proposed dry hydrant is 5.7 km, which was added in consultation with and at the direction of the Fire Chief. OBC regulation referencing distance to hydrant is not relevant and does not apply to this BESS installation as it is not classified as a building.</i> FRA Response [10-22-2025]: <i>The question of whether these units would be classified as buildings has been discussed extensively with both the Fire Department and the Township of Armour's Chief Building Official. The Chief Building Officer confirmed that these are not classified as buildings, as they are containerized, outdoor, non-walk-in units with no internal access and no potential for occupancy. They would be classified as electrical equipment, similar to transformers etc. Please also see the attached correspondence from EVLO engineer which provides additional technical detail and confirms that these units are not classified as buildings under NFPA definitions either. As such, OBC Article 3.2.5.5 does not apply.</i> <i>Our OPA/ZBA applications were not deemed complete by the municipality until the Fire Chief confirmed that he was satisfied with both the ERP and the HMA. One of the key topics of discussion was the water supply. At the Fire Chief's recommendation, a dry hydrant was added at a location of his choosing to provide additional assurance that adequate water would be available in the unlikely event of a thermal incident, although Chief Building Official had confirmed that water supply would not be required by code as these are not classified as buildings. We were happy to incorporate this measure and the HMA was updated accordingly. Following that update, the Fire Chief provided written confirmation of his satisfaction with the HMA, at which point the municipality</i>	PLC Response [07-24-2025]: Section 4.1.5 of the HMA report states the address of where the hydrant is located, however it does not specify the distance to the Solarbank Project 903 site. Please clarify the distance of the hydrant to the site and whether it complies with OBC Article 3.2.5.5. PLC Response [08-25-2025]: While not a conventional building, the structure meets the definition of building under the Ontario Building Code Act. Therefore, application of the OBC is to be addressed. Furthermore, no information regarding consultation with the Fire Department has been provided. Please provide clarity on this issue. PLC Response [11-03-2025]: Based on the provided correspondence from the Fire Chief and our response to the Item above, the proposed location of the dry hydrant relative to the site's remote location is acceptable. Disposition accepted. Item closed
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NO.	REVIEWER COMMENT	DESIGN DISPOSITION	REVIEWER CONCURRENCE
		<i>accepted our applications as complete and issued the formal notice of completeness.</i> <i>i. See attached discussion with the Fire Department regarding location of dry hydrant.</i> <i>ii. See attached email chain with Clerk stating they cannot move forward with the application until they get confirmation from the Fire Chief that the ERP/HMA are satisfactory</i> <i>iii. See attached email chain with Fire Chief confirming he was waiting for confirmation from building official that these are not classified as buildings</i> <i>iv. Phone call was had with the Chief where he advised that the building official confirmed these are not classified as buildings and we could proceed with the HMA/ERP</i> <i>v. See attached email chain with Fire Chief confirming that he was satisfied with the latest HMA</i> <i>vi. See email chain with Clerk confirming we could now proceed to next steps as Fire Chiefs confirmation was received.</i>	

Ina Lila

From: Jérémie Lepage <Lepage.Jeremie@evloenergie.com>
Sent: November 12, 2024 3:25 PM
To: Ina Lila
Cc: Alexandrine Joseph; Andrew van Doorn; Hashmat Rahin; Dennis Stainton; Tracy Zheng; Bruno Soulières; Mathilde Garrigue
Subject: RE: 903 BESS

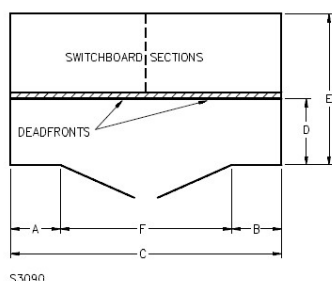
Hi Ina,

As discusses :

- The EVLOFLEX is not a walk-in unit
- The EVLOFLEX is within the maximum dimension described by NFPA 855 9.5.2.4.1 and is non considered a building as per 9.5.2.4.2
- All equipment and accessories that may require maintenance are accessible without stepping into the equipment, including the batteries themselves
- Non-walk in requirements are described in figure 12 of UL 891, referred to by UL9540 (see image bellow). The EVLOFLEX complies as a non-walk in enclosure.

Figure 12
Single sided non-walk in enclosed switchboard

(See 8.2.1.5.8)



Values of variables

A (maximum) ^a		B (maximum) ^a		C (minimum)		D		E (maximum) ^b		F (minimum)	
mm	(in)	mm	(in)	mm	(in)	mm	(in)	mm	(in)	mm	(in)
12.7	(1/2)	12.7	(1/2)	Not specified		Not specified		610	(24)	Not specified	
76.2	(3)	76.2	(3)	356 (A + B)	14 + (A + B)	Not specified		610	(24)	356	(14)
76.2	(3)	76.2	(3)	610 + (A + B)	24 + (A + B)	Not specified		610	(24)	610	(24)

^a If the value of dimension A or B is exceeded, then Figure 11 shall apply.

^b If back access panels are provided, dimension E is not specified. If back access panels are not provided and dimension E exceeds 610 mm (24 inches), then Figure 11 shall apply.

BR

JÉRÉMIE LEPAGE, ING.

Ingénieur principal des ventes

Principal sales engineer

Gary Chan

From: Ina Lila <ina.lila@powerbankcorp.com>
Sent: Monday, January 13, 2025 11:59 AM
To: Joe Readman
Subject: RE: BESS ERP & HMA with Revisions

Hi Chief Readman,

Thank you so much for your review! We can certainly adjust the wording as needed. The reason I initially used "if feasible" was because, at the time—and even now—we haven't received confirmation from the municipality regarding a suitable location for the hydrant. I'll revise the language to say "pending confirmation of location from the municipality" instead, which should provide better clarity.

Please confirm that is acceptable to you.

Thanks,

Ina

From: Joe Readman <fire@ryersontownship.ca>
Sent: January 13, 2025 2:55 PM
To: Ina Lila <ina.lila@solarbankcorp.com>
Subject: RE: BESS ERP & HMA with Revisions

Good afternoon,

I have reviewed the documents everything looks good.
Only concern is the wording around Emergency water, and it being feasible for the dry hydrant..

I think the best location for a dry hydrant would be adjacent to the Katrine beach into the Magnetawan River; good depth and lots of water.
Let me know if you need anything else.

Thank you,
Joe Readman
Fire Chief
Burk's Falls and District Fire Department
cell: 705-783-3571
Office:705-382-4010
email: fire@ryersontownship.ca

From: Ina Lila <ina.lila@solarbankcorp.com>
Sent: January 13, 2025 9:43 AM
To: Joe Readman <fire@ryersontownship.ca>
Cc: Andrew van Doorn <andrew.vandoorn@solarbankcorp.com>; Dennis Stainton <dennis.stainton@solarbankcorp.com>; Tracy Zheng <tracy.zheng@solarbankcorp.com>

Subject: RE: BESS ERP & HMA with Revisions

Importance: High

Good morning Chief Readman,

I hope you had a lovely weekend! I tried reaching you by phone this morning but wasn't able to connect, so I wanted to follow up via email regarding your final review of the HMA and ERP. Your confirmation on these documents is essential for us to move forward with the permitting process, and given our contractual obligation to have the site operational by May 2026, the timing is becoming increasingly critical.

I would really appreciate it if you could provide your response by the end of the day today. Please let me know if there's anything else I can do to assist.

Thank you so much for your time. I look forward to hearing from you soon!

Thank you,

Ina

From: Ina Lila

Sent: January 6, 2025 1:27 PM

To: Chief Joe Readman (fire@ryersontownship.ca) <fire@ryersontownship.ca>

Cc: Charlene Watt (Deputy Clerk) <deputyclerk@armourtownship.ca>; Andrew van Doorn <andrew.vandoorn@solarbankcorp.com>; Dennis Stainton <dennis.stainton@solarbankcorp.com>; John Theriault (Clerk-Treasurer Administrator) <clerk@armourtownship.ca>; Amy Tilley <landfill@armourtownship.ca>

Subject: RE: BESS ERP & HMA with Revisions

Hi Chief Readman,

Happy New Year! Hope you had a lovely holiday season with your loved ones.

I wanted to follow up on the ERP & HMA revisions we sent over to ensure that they meet your expectations. Your timely response would be greatly appreciated so that we can move forward with the next steps in the OPA/ZBA process.

Thank you,

Ina

From: Ina Lila

Sent: December 17, 2024 4:16 PM

To: Chief Joe Readman (fire@ryersontownship.ca) <fire@ryersontownship.ca>

Cc: Charlene Watt (Deputy Clerk) <deputyclerk@armourtownship.ca>; Andrew van Doorn <andrew.vandoorn@solarbankcorp.com>; Dennis Stainton <dennis.stainton@solarbankcorp.com>; John Theriault (Clerk-Treasurer Administrator) <clerk@armourtownship.ca>; Amy Tilley <landfill@armourtownship.ca>

Subject: RE: BESS ERP & HMA with Revisions

Good afternoon Chief Readman,

I hope you're doing well. I wanted to follow up to see if you've had a chance to review the revised HMA & ERP, and whether you're comfortable with the changes made. If so, we'd love to move forward with the OPA/ZBA

applications. We are eager to proceed with the permitting process and were hoping to submit the OPA/ZBA packages by the end of this week, pending your confirmation.

Thank you for your time and consideration.

Thank you,

Ina

From: Ina Lila

Sent: December 11, 2024 5:08 PM

To: Chief Joe Readman (fire@ryersontownship.ca) <fire@ryersontownship.ca>

Cc: Charlene Watt (Deputy Clerk) <deputyclerk@armourtownship.ca>; Andrew van Doorn

<andrew.vandoorn@solarbankcorp.com>; Dennis Stainton <dennis.stainton@solarbankcorp.com>; John Theriault (Clerk-Treasurer Administrator) <clerk@armourtownship.ca>; Amy Tilley <landfill@armourtownship.ca>

Subject: BESS ERP & HMA with Revisions

Good afternoon Chief Readman,

Thank you for taking the time to review the ERP & HMA and provide your valuable feedback. We have revised both documents based on your comments and have attached the updated versions for your review. Additionally, I've included Notes & Revisions trackers for each document, which outline the changes made and provide responses to the remaining comments from the meetings. Not all items discussed required revisions; some were simply clarifications, which I have noted in the trackers. Any item marked as "Done" in the Status column reflects a change, while those left blank in the Status column pertain to points that needed further clarification, which I have addressed in the Comments/Explanations column.

I've also attached the additional back up documents that we discussed during the meetings which have also been referenced in the Revision trackers in their relevant sections.

We trust that all comments from the meetings have been addressed and would appreciate your final review and confirmation.

Thank you again for your time, and I look forward to hearing from you.

Thank you,

Ina

Gary Chan

From: Joe Readman <fire@ryersontownship.ca>
Sent: Tuesday, December 10, 2024 10:41 AM
To: Ina Lila
Subject: RE: HMA Question Clarification

Good afternoon,

Sorry about the delay in response.

The comment was the quotes were not 100% accurate in the HMA from NFPA. I was concerned with 4.4.3.1 but once Doug confirms these are not “buildings” we don’t have to worry about the 2 hour fire resistance rating specified in 9.6.4 as is in the standard 4.4.3.1 but not quoted in the HMA

Thank you,
Joe Readman
Fire Chief
Burk's Falls and District Fire Department
cell: 705-783-3571
Office: 705-382-4010
email: fire@ryersontownship.ca

From: Ina Lila <ina.lila@solarbankcorp.com>
Sent: November 27, 2024 10:15 PM
To: Joe Readman <fire@ryersontownship.ca>
Subject: HMA Question Clarification

Hi Chief Readman,

I hope you’re doing well. I’ve been reviewing the HMA notes and the revisions we discussed in yesterday’s meeting, and I was hoping you could clarify something for me as I want to make sure I clearly address everything in this first round of revisions.

You mentioned that under Section 1.1 where NFPA 855 4.4.2 and 4.4.3 are referenced, that only part of the NFPA code was included. I wanted to clarify which additional code sections you might be referring to. Are you pointing to the remaining parts under the Failure Modes section, such as 4.4.4 and 4.4.5 (below), or is it something else?

I would really appreciate your guidance on this.

Thank you,

Ina

4.4.2 Failure Modes.

4.4.2.1* The hazard mitigation analysis shall evaluate the consequences of the following failure modes and others deemed necessary by the AHJ:

- (1) A thermal runaway or mechanical failure condition in a single ESS unit
- (2) Failure of an energy storage management system or protection system that is not covered by the product listing failure modes and effects analysis (FMEA)
- (3) Failure of a required protection system including, but not limited to, ventilation (HVAC), exhaust ventilation, smoke detection, fire detection, fire suppression, or gas detection

4.4.2.2 Only single failure modes shall be considered for each mode given in 4.4.2.1.

4.4.3 The AHJ shall be permitted to approve the hazard mitigation analysis as documentation of the safety of the ESS installation if the consequences of the analysis demonstrate the following:

- (1) Fires will be contained within unoccupied ESS rooms for the minimum duration of the fire resistance rating specified in 9.6.4.
- (2) Fires and products of combustion will not prevent occupants from evacuating to a safe location.
- (3) Deflagration hazards will be addressed by an explosion control or other system.

4.4.4 The hazard mitigation analysis shall be documented and made available to the AHJ and those authorized to design and operate the system.

4.4.5* Construction, equipment, and systems that are required for the ESS to comply with the hazard mitigation analysis shall be installed, tested, and maintained in accordance with this standard and the manufacturer's instructions.

Gary Chan

From: Charlene Watt (Deputy Clerk) <deputyclerk@armourtownship.ca>
Sent: Tuesday, January 14, 2025 8:22 AM
To: Ina Lila
Cc: Chief Joe Readman (fire@ryersontownship.ca); John Theriault (Clerk-Treasurer Administrator); Amy Tilley; Andrew van Doorn; Dennis Stainton; Tracy Zheng; Robert Miller; Robert Miller - Planner (plansifter@gmail.com); cameron haffner; Kaiyla Hoffmann; leodeloyde@gmail.com; Dave Creasor; Mayor Rod Ward
Subject: RE: OPA/ZBA Application

Hello Ina,
Thanks for the confirmation email regarding the ERP and HMP from the Fire Chief. Please forward the revised documents once you have completed them. I will be in touch tomorrow about next steps.

Thanks for your patience.

Charlene Watt

Deputy Clerk, Dipl.M.M.
Township of Armour
PO Box 533, 56 Ontario Street
Burk's Falls, Ontario P0A 1C0
Telephone: 705-382-3332
Fax: 705-382-2068

Website: www.armourtownship.ca

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From: Ina Lila <ina.lila@solarbankcorp.com>
Sent: January 14, 2025 11:17 AM
To: Charlene Watt (Deputy Clerk) <deputyclerk@armourtownship.ca>
Cc: Chief Joe Readman (fire@ryersontownship.ca) <fire@ryersontownship.ca>; John Theriault (Clerk-Treasurer Administrator) <clerk@armourtownship.ca>; Amy Tilley <landfill@armourtownship.ca>; Andrew van Doorn <andrew.vandoorn@solarbankcorp.com>; Dennis Stainton <dennis.stainton@solarbankcorp.com>; Tracy Zheng <tracy.zheng@solarbankcorp.com>; Robert Miller <robertj.miller@sympatico.ca>; Robert Miller - Planner (plansifter@gmail.com) <plansifter@gmail.com>; cameron haffner <chaffner.bffd@gmail.com>; Kaiyla Hoffmann <buildingadmin@armourtownship.ca>; leodeloyde@gmail.com; Dave Creasor <creasor1@gmail.com>
Subject: RE: OPA/ZBA Application
Importance: High

Hi Charlene,

I hope your week is going well!

I'm happy to share that I received confirmation from Chief Readman yesterday that he is satisfied with the ERP and HMA, with only one minor language change, which I've already made and uploaded to the shared drive where all documents are stored. Now that all documents have been submitted and we've received the Fire Chief's confirmation, could you kindly confirm if our application is accepted and let us know what the fee is?

I also wanted to follow up on my previous request to schedule an in-person meeting to discuss the next steps for the OPA/ZBA. As mentioned, we have a contractual obligation to have the site operational by May 2026, so timing is becoming increasingly critical for us.

Looking forward to your response and thank you so much for your time!

Thank you,

Ina

From: Ina Lila

Sent: January 10, 2025 1:18 PM

To: Charlene Watt (Deputy Clerk) <deputyclerk@armourtownship.ca>

Cc: Chief Joe Readman (fire@ryersontownship.ca) <fire@ryersontownship.ca>; John Theriault (Clerk-Treasurer Administrator) <clerk@armourtownship.ca>; Amy Tilley <landfill@armourtownship.ca>; Andrew van Doorn <andrew.vandoorn@solarbankcorp.com>; Dennis Stainton <dennis.stainton@solarbankcorp.com>; Tracy Zheng <tracy.zheng@solarbankcorp.com>; Robert Miller <robertj.miller@sympatico.ca>; Robert Miller - Planner (plansifter@gmail.com) <plansifter@gmail.com>; cameron haffner <chaffner.bffd@gmail.com>; Kaiyla Hoffmann <buildingadmin@armourtownship.ca>; leodeloyde@gmail.com; Dave Creasor <creasor1@gmail.com>

Subject: Meeting Request to Discuss OPA/ZBA Application

Importance: High

Good afternoon Charlene,

I hope you are doing well.

I'm reaching out to request an in-person meeting next week to discuss the next steps in the OPA/ZBA application process. Our planner will be joining the meeting along with Andrew and myself. I spoke with the Fire Chief yesterday, and he mentioned that he would provide feedback on the ERP and HMA today. This timing aligns well for us to meet next week and review how we can move the application forward efficiently now that we have submitted the required materials. Given our contractual obligation with the IESO to have the site operational by May 2026, time is of the essence, and I'd appreciate discussing a clear path toward achieving that goal.

I look forward to your response.

Thank you,

Ina

From: Charlene Watt (Deputy Clerk) <deputyclerk@armourtownship.ca>

Sent: January 3, 2025 11:48 AM

To: Ina Lila <ina.lila@solarbankcorp.com>

Cc: Chief Joe Readman (fire@ryersontownship.ca) <fire@ryersontownship.ca>; John Theriault (Clerk-Treasurer Administrator) <clerk@armourtownship.ca>; Amy Tilley <landfill@armourtownship.ca>; Andrew van Doorn <andrew.vandoorn@solarbankcorp.com>; Dennis Stainton <dennis.stainton@solarbankcorp.com>; Tracy Zheng <tracy.zheng@solarbankcorp.com>; Robert Miller <robertj.miller@sympatico.ca>; Robert Miller - Planner (plansifter@gmail.com) <plansifter@gmail.com>; cameron haffner <chaffner.bffd@gmail.com>; Kaiyla Hoffmann <buildingadmin@armourtownship.ca>

Subject: RE: OPA/ZBA Applications

Hello Ina,

I have not received confirmation from the Fire Chief that the HMA and ERP are satisfactory.
I've cc'd Bob Miller to advise you on next steps but the Fire Chief's approval of any emergency response materials is a priority.
Thanks,

Charlene Watt

Deputy Clerk, Dipl.M.M.
Township of Armour
PO Box 533, 56 Ontario Street
Burk's Falls, Ontario P0A 1C0
Telephone: 705-382-3332
Fax: 705-382-2068

Website: www.armourtownship.ca

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Gary Chan

From: Ina Lila <ina.lila@powerbankcorp.com>
Sent: Monday, January 6, 2025 6:24 AM
To: Charlene Watt (Deputy Clerk)
Cc: Chief Joe Readman (fire@ryersontownship.ca); John Theriault (Clerk-Treasurer Administrator); Amy Tilley; Andrew van Doorn; Dennis Stainton; Tracy Zheng; Robert Miller; Robert Miller - Planner (plansifter@gmail.com); cameron haffner; Kaiyla Hoffmann
Subject: RE: OPA/ZBA Applications

Hi Charlene,

Happy New Year! Hope you had a lovely holiday season.

I will continue to follow up with the Fire Chief this week to obtain his confirmation on the ERP & HMA. In the meantime, I look forward to hearing from you or Bob regarding the next steps, so I can begin working on them.

Thank you!

Ina

From: Charlene Watt (Deputy Clerk) <deputyclerk@armourtownship.ca>
Sent: January 3, 2025 11:48 AM
To: Ina Lila <ina.lila@solarbankcorp.com>
Cc: Chief Joe Readman (fire@ryersontownship.ca) <fire@ryersontownship.ca>; John Theriault (Clerk-Treasurer Administrator) <clerk@armourtownship.ca>; Amy Tilley <landfill@armourtownship.ca>; Andrew van Doorn <andrew.vandoorn@solarbankcorp.com>; Dennis Stainton <dennis.stainton@solarbankcorp.com>; Tracy Zheng <tracy.zheng@solarbankcorp.com>; Robert Miller <robertj.miller@sympatico.ca>; Robert Miller - Planner (plansifter@gmail.com) <plansifter@gmail.com>; cameron haffner <chaffner.bffd@gmail.com>; Kaiyla Hoffmann <buildingadmin@armourtownship.ca>
Subject: RE: OPA/ZBA Applications

Hello Ina,
I have not received confirmation from the Fire Chief that the HMA and ERP are satisfactory.
I've cc'd Bob Miller to advise you on next steps but the Fire Chief's approval of any emergency response materials is a priority.
Thanks,

Charlene Watt

Deputy Clerk, Dipl.M.M.
Township of Armour
PO Box 533, 56 Ontario Street
Burk's Falls, Ontario P0A 1C0
Telephone: 705-382-3332
Fax: 705-382-2068

Website: www.armourtownship.ca

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From: Ina Lila <ina.lila@solarbankcorp.com>

Sent: December 23, 2024 2:42 PM

To: Charlene Watt (Deputy Clerk) <deputyclerk@armourtownship.ca>

Cc: Chief Joe Readman (fire@ryersontownship.ca) <fire@ryersontownship.ca>; John Theriault (Clerk-Treasurer Administrator) <clerk@armourtownship.ca>; Amy Tilley <landfill@armourtownship.ca>; Andrew van Doorn <andrew.vandoorn@solarbankcorp.com>; Dennis Stainton <dennis.stainton@solarbankcorp.com>; Tracy Zheng <tracy.zheng@solarbankcorp.com>

Subject: OPA/ZBA Applications

Hi Charlene,

Please find attached the OPA and ZBA applications for the proposed Battery Energy Storage System (BESS) at Peggs Mountain Road. Due to the size and number of additional documents, all other relevant materials have been uploaded to the shared drive at the link below. For your reference, I've also attached a checklist based on our pre-consultation meeting, which details the files uploaded to the drive.

 [12. 903 Armour](#)

Could you kindly confirm receipt of the attached documents and verify if the OPA/ZBA packages are now complete? Additionally, I would appreciate it if you could please advise on next steps.

Thank you for your time and support throughout this process!

Wishing you, everyone at the Township of Armour, and the Burks Falls Fire Department a very Merry Christmas and a Happy New Year!

Thanks,

Ina

Gary Chan

From: Joe Readman <fire@ryersontownship.ca>
Sent: Thursday, May 22, 2025 2:25 PM
To: Ina Lila
Cc: Charlene Watt (Deputy Clerk); Robert MacFarlane - Zelinka Priamo Ltd.; Robert Miller - Planner (plansifter@gmail.com); Dave Creasor; Amy Tilley
Subject: Re: SolarBank: Third Party Review of Hazard Mitigation Analysis
Attachments: image001.png; image002.png; image003.png; image004.png; image005.png

The best location and my recommendation would be across the road from the katrine beach located at 1014 Ferguson rd. This location gives good line of sight either direction for firefighter safety, allows multiple routes guaranteeing access and has unlimited water.

Thank you,
Joe Readman
Fire Chief
Burk's Falls and District Fire Department
cell: 705-783-3571
Office: 705-382-4010
email: fire@ryersontownship.ca

On May 22, 2025, at 4:37 PM, Ina Lila <ina.lila@solarbankcorp.com> wrote:

Thanks for sending this over Charlene! I reviewed the comments and was hoping to get [@Chief Joe Readman \(fire@ryersontownship.ca\)](#) input on one of the questions listed.

They would like to know the location of the dry hydrant, however based on our previous conversations this was to be determined by the municipality together with the Fire Department. Have you given this location any further thought and is there a particular one you would like me to include in the report? Or would you prefer me explaining that it will be decided at a later stage in the permitting process?

Looking forward to your feedback.

Thank you,

Ina Lila, CPA
Director of Business
Development
<image001.png>

<image002.png> (647) 835 5503
<image003.png> Ina.Lila@solarbankcorp.com
<image004.png> www.solarbankcorp.com
<image005.png> 505 Consumers Road, Suite 803
Toronto, Ontario, Canada M2J 4V8



Book time to meet with me

From: Charlene Watt (Deputy Clerk) <deputyclerk@armourtownship.ca>
Sent: May 21, 2025 4:02 PM
To: Ina Lila <ina.lila@solarbankcorp.com>; Robert MacFarlane - Zelinka Priamo Ltd. <robert.m@zpplan.com>
Cc: Robert Miller - Planner (plansifter@gmail.com) <plansifter@gmail.com>; Dave Creasor <creasor1@gmail.com>; Chief Joe Readman (fire@ryersontownship.ca) <fire@ryersontownship.ca>; Amy Tilley <landfill@armourtownship.ca>
Subject: SolarBank: Third Party Review of Hazard Mitigation Analysis

Hello Ina,
Please see attached the HMA peer review.
Thank you,

Charlene Watt

Municipal Clerk, Dipl.M.M.
Township of Armour
PO Box 533, 56 Ontario Street
Burk's Falls, Ontario P0A 1C0
Telephone: 705-382-3332
Fax: 705-382-2068

Website: www.armourtownship.ca

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From: Sam Zareian <szareian@plcfire.com>
Sent: May 15, 2025 2:51 PM
To: Charlene Watt (Deputy Clerk) <deputyclerk@armourtownship.ca>
Subject: Third Party Review of Hazard Mitigation Analysis

Hi Charlene,

Please see attached for the Third-Party Review (TPR) of Hazard Mitigation Analysis (HMA) in draft for your review and feedback. Please circulate it with the appropriate individuals, as necessary.

Best regards,
Sam

Sam Zareian, MASC., EIT., RHFAC.
Technical Specialist



4 Robert Speck Parkway, Suite 1500
Mississauga, ON L4Z 1S1

P: (905) 949-2755 x 207

E: szareian@plcfire.com

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Gary Chan

From: Joe Readman <fire@ryersontownship.ca>
Sent: Friday, October 31, 2025 9:26 AM
To: Charlene Watt (Deputy Clerk); Sam Zareian
Cc: Gary Chan; Mohamed Mushantat; Rudy Cronk; Robert Miller; Sam Soja
Subject: RE: PowerBank - Peer Review of HMA P2738

Warning! This email came from outside your company.

With this location we would travel south on Ferguson rd, fill and then travel up highway 11 full. Safer operation when we don't need to pass on two lane roads.

Thank you,
Joe Readman
Fire Chief
Burk's Falls and District Fire Department
cell: 705-783-3571
Office: 705-382-4010
email: fire@ryersontownship.ca

From: Charlene Watt (Deputy Clerk) <deputyclerk@armourtownship.ca>
Sent: October 31, 2025 9:37 AM
To: Joe Readman <fire@ryersontownship.ca>; Sam Zareian <szareian@plcfire.com>
Cc: Gary Chan <gchan@plcfire.com>; Mohamed Mushantat <mmushantat@plcfire.com>; Rudy Cronk <rcronk@plcfire.com>; Robert Miller <plansifter@gmail.com>; Sam Soja <sam.soja@tulloch.ca>
Subject: RE: PowerBank - Peer Review of HMA P2738

Here's the same document with the BESS property highlighted, not a random property on Madill Road.

From: Charlene Watt (Deputy Clerk)
Sent: October 31, 2025 9:33 AM
To: 'Joe Readman' <fire@ryersontownship.ca>; Sam Zareian <szareian@plcfire.com>
Cc: Gary Chan <gchan@plcfire.com>; Mohamed Mushantat <mmushantat@plcfire.com>; Rudy Cronk <rcronk@plcfire.com>; Robert Miller <plansifter@gmail.com>; Sam Soja <sam.soja@tulloch.ca>
Subject: RE: PowerBank - Peer Review of HMA P2738

Hello
Here are a couple maps from our CGIS system and Google Maps. I don't know if the fire trucks will be turning around after filling up and going back up Ferguson Road or if they will take the Katrine Road and loop back through to 219 Peggs Mountain Road.

Cheers,

Charlene Watt

Municipal Clerk, Dipl.M.M.
Township of Armour
PO Box 533, 56 Ontario Street
Burk's Falls, Ontario P0A 1C0

Telephone: 705-382-3332

Fax: 705-382-2068

Website: www.armourtownship.ca

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From: Joe Readman <fire@ryersontownship.ca>

Sent: October 31, 2025 9:15 AM

To: Sam Zareian <szareian@plcfire.com>; Charlene Watt (Deputy Clerk) <deputyclerk@armourtownship.ca>

Cc: Gary Chan <gchan@plcfire.com>; Mohamed Mushantat <mmushantat@plcfire.com>; Rudy Cronk <rcronk@plcfire.com>; Robert Miller <plansifter@gmail.com>; Sam Soja <sam.soja@tulloch.ca>

Subject: RE: PowerBank - Peer Review of HMA P2738

Please see my replies in red.

We are assessing the firefighting strategy for the site with respect to the proposed dry hydrant. Can the fire chief clarify the following for responding to a fire at this site:

- *The number of tankers units (and their capacities) available to respond.*
 - *From Burks Falls 1-2000Gal tanker*
 - *From Auto Aid partners 4-2000Gal tankers*
- *Estimated response times. Specifically, please provide the fill time, travel time to scene, dump time and return time.*
 - *Too many variables to answer this one.. a google map will give you an idea, Fill times vary depending on truck and design.*
- *Are the tankers units equipped with on-board pumps? If not, how will water be added to the tankers?*
 - *We send a pumper to our fill sites as a "fill truck", most tankers do have an onboard pump as well.*
- *Confirm the source of the water supply feeding the dry hydrant.*
 - *The proposed location is part of the Magnetawan river system*

Thank you,

Joe Readman

Fire Chief

Burk's Falls and District Fire Department

cell: 705-783-3571

Office: 705-382-4010

email: fire@ryersontownship.ca

From: Sam Zareian <szareian@plcfire.com>

Sent: October 31, 2025 9:07 AM

To: Charlene Watt (Deputy Clerk) <deputyclerk@armourtownship.ca>

Cc: Joe Readman <fire@ryersontownship.ca>; Gary Chan <gchan@plcfire.com>; Mohamed Mushantat <mmushantat@plcfire.com>; Rudy Cronk <rcronk@plcfire.com>; Robert Miller <plansifter@gmail.com>; Sam Soja <sam.soja@tulloch.ca>

Subject: RE: PowerBank - Peer Review of HMA P2738

Hi Charlene,

Our team (copied in the email) reviewed the below information on the dispositions relevant to the HMA, and provided the below comment. Please let me know if you and the fire chief would like to have a call.

We are assessing the firefighting strategy for the site with respect to the proposed dry hydrant. Can the fire chief clarify the following for responding to a fire at this site:

- *The number of tankers units (and their capacities) available to respond.*
- *Estimated response times. Specifically, please provide the fill time, travel time to scene, dump time and return time.*
- *Are the tankers units equipped with on-board pumps? If not, how will water be added to the tankers?*
- *Confirm the source of the water supply feeding the dry hydrant.*

Best regards,
Sam

From: Charlene Watt (Deputy Clerk) <deputyclerk@armourtownship.ca>

Sent: October 22, 2025 1:38 PM

To: Sam Zareian <szareian@plcfire.com>; Rudy Cronk <rcronk@plcfire.com>

Cc: Chief Joe Readman (fire@ryersontownship.ca) <fire@ryersontownship.ca>; Sam Soja <sam.soja@tulloch.ca>; Robert Miller <plansifter@gmail.com>

Subject: FW: PowerBank - Peer Review of HMA

Warning! This email came from outside your company.

Hello Sam and Rudy,

I think a response from PLC is required on this one. Below are my thoughts.

Please note that the majority of the attached emails were sent **prior** to the initiation of the PLC peer review process. Only one email, dated May 2025, contains a recommendation from Chief Readman regarding the preferred location for the dry hydrant.

I am concerned that the advice suggesting the units are not classified as buildings may be an attempt to circumvent the building permit requirements. I have confirmed that all municipalities in Ontario with BESS projects have required building permits.

It is important to emphasize that the information conveyed prior to the peer review process pertained only to the completeness of the application and should not be interpreted as indicative of the final requirements.

The "limited scope" items are concerns that require a response to PLC in their capacity as our professional peer reviewers. I do not believe it is appropriate for the Township to interfere with or influence PLC's independent review process.

Would appreciate your input on the below email.

Thanks,

Charlene Watt

Municipal Clerk, Dipl.M.M.

Township of Armour

PO Box 533, 56 Ontario Street

Burk's Falls, Ontario P0A 1C0

Telephone: 705-382-3332

Fax: 705-382-2068

Website: www.armourtownship.ca

From: Robert MacFarlane - Zelinka Priamo Ltd. <robert.m@zpplan.com>
Sent: October 22, 2025 12:59 PM
To: Charlene Watt (Deputy Clerk) <deputyclerk@armourtownship.ca>; 'Ina Lila' <ina.lila@solarbankcorp.com>
Cc: Robert Miller - Planner (plansifter@gmail.com) <plansifter@gmail.com>; Chief Joe Readman (fire@ryersontownship.ca) <fire@ryersontownship.ca>; Sam Soja <sam.soja@tulloch.ca>; Sam Zareian <szareian@plcfire.com>; gchan@plcfire.com; mmushantat@plcfire.com
Subject: RE: PowerBank - Peer Review of HMA

Hi Charlene and Sam Z., thank you for providing the HMA Comments. Given the relatively limited scope of outstanding comments, we were hoping to provide some clarity via email here, and if needed we are glad to arrange a brief call to discuss further. Please see attached some email correspondence referenced below to provide context for the responses and HMA.

Our intent is that the below responses provided to us by Powerbank, do address the two outstanding items. If there are any outstanding comments/questions, we would be glad to arrange a brief call, perhaps next week, to discuss further. Please let us know and we can coordinate.

Please see below and attached:

- 1) "It is acknowledged that no alternative fire suppression is proposed. As noted, Section 9.5.2.5 of NFPA 855 does permit fire suppression system and water supply requirements to be relaxed if there's agreement between AHJ and site owner. No details on an agreement with the AHJ have been provided. Please clarify."
 - The agreement with the AHJ, resulting from an in-person meeting at the Township of Armour office on Nov 26, 2024, was the installation of a dry hydrant at a location of their choosing which was added to the HMA. See below and attached additional details in this regard.
- 2) "While not a conventional building, the structure meets the definition of building under the Ontario Building Code Act. Therefore, application of the OBC is to be addressed. Furthermore, no information regarding consultation with the Fire Department has been provided. Please provide clarity on this issue."
 - The question of whether these units would be classified as buildings has been discussed extensively with both the Fire Department and the Township of Armour's Chief Building Official. The Chief Building Officer confirmed that these are not classified as buildings, as they are containerized, outdoor, non-walk-in units with no internal access and no potential for occupancy. They would be classified as electrical equipment, similar to transformers etc. Please also see the attached correspondence from EVLO engineer which provides additional technical detail and confirms that these units are not classified as buildings under NFPA definitions either. As such, OBC Article 3.2.5.5 does not apply.
 - Our OPA/ZBA applications were not deemed complete by the municipality until the Fire Chief confirmed that he was satisfied with both the ERP and the HMA. One of the key topics of discussion was the water supply. At the Fire Chief's recommendation, a dry hydrant was added at a location of his choosing to provide additional assurance that adequate water would be available in the unlikely event of a thermal incident, although Chief Building Official had confirmed that water supply would not be required by code as these are not classified as buildings. We were happy to incorporate this measure and the HMA was updated accordingly. Following that update, the Fire Chief provided written confirmation of his satisfaction with the HMA, at which point the municipality accepted our applications as complete and issued the formal notice of completeness.
 - i. See attached discussion with the Fire Department regarding location of dry hydrant.
 - ii. See attached email chain with Clerk stating they cannot move forward with the application until they get confirmation from the Fire Chief that the ERP/HMA are satisfactory
 - iii. See attached email chain with Fire Chief confirming he was waiting for confirmation from building official that these are not classified as buildings
 - iv. Phone call was had with the Chief where he advised that the building official confirmed these are not classified as buildings and we could proceed with the HMA/ERP
 - v. See attached email chain with Fire Chief confirming that he was satisfied with the latest HMA
 - vi. See email chain with Clerk confirming we could now proceed to next steps as Fire Chiefs confirmation was received

Thanks

Rob MacFarlane
Zelinka Priamo Ltd. – Land Use Planners
C: 416-801-6140

From: Charlene Watt (Deputy Clerk) <deputyclerk@armourtownship.ca>
Sent: Monday, October 6, 2025 9:04 AM
To: Robert MacFarlane - Zelinka Priamo Ltd. <robert.m@zpplan.com>; 'Ina Lila' <ina.lila@solarbankcorp.com>
Cc: Robert Miller - Planner (plansifter@gmail.com) <plansifter@gmail.com>; Chief Joe Readman
(fire@ryersontownship.ca) <fire@ryersontownship.ca>; Sam Soja <sam.soja@tulloch.ca>; Sam Zareian
<szareian@plcfire.com>
Subject: PowerBank - Peer Review of HMA

Good morning,
Please see attached. Two items remained open for SolarBank/PowerBank to provide feedback on.
Thank you,

Charlene Watt

Municipal Clerk, Dipl.M.M.
Township of Armour
PO Box 533, 56 Ontario Street
Burk's Falls, Ontario P0A 1C0
Telephone: 705-382-3332
Fax: 705-382-2068

Website: www.armourtownship.ca

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