



October 9, 2026

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

RE: Peggs Mountain BESS Emergency Response Plan disposition update

PLC Fire Safety Engineering, a Jensen Hughes Company, has reviewed the Peggs Mountain BESS Emergency Response Plan (ERP), Rev. 1, approved August 21, 2025, and SolarBank's March 2, 2026, Q&A, received by the Township on August 27, 2026. Enclosed Appendix A provides proposed dispositions for 24 distinct original findings and three follow-up corrections. The second finding previously numbered 21 is designated 21A.

Several original findings can close for ERP purposes; others remain open. Final concurrence should await a controlled, consolidated ERP revision and confirmation of applicable tracked actions, including the proposed water supply. Principal outstanding matters include community protective-action criteria, local alarm response and ROC contingencies, and the firefighter training program.

Appendix A provides the item-by-item dispositions and required follow-up. The firefighter lesson plan has been reviewed and remains open pending the details identified in Item 7. Once accepted, it should be included in the ERP or controlled by reference.

This is a draft technical review, not final concurrence or verification that proposed response resources have been installed. It does not address land-use approval.

Prepared by:

Signed by:

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Rudy Cronk
Senior Technical Specialist

Reviewed by:

Signed by:

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Enclosure: Appendix A, Updated Disposition of ERP Findings

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Appendix A¹ Updated Disposition of ERP Findings

Status basis: 24 legacy findings. 15 findings have been closed and 12 findings remain open, this includes three (3) new findings.

Note: Item number 21 was utilized twice in the previous edition and has been relabeled items 21 and 21A in this edition.

NO.	REVIEWER COMMENT	SOLARBANK RESPONSE	UPDATED REVIEWER DISPOSITION
1	PPE Standard Reference – Section 6.1.6 references NFPA 1971 and not the latest version of the standard for PPE NFPA 1970. The ERP must provide a clear justification for continuing to use NFPA 1971 or commit to updating its reference and requirements to NFPA 1970 to align with current standards. Reference: NFPA 1970	Rev. 1 Section 6.1.6 references NFPA 1970.	CLOSED.
2	Community Notification – The ERP (Sections 7 and 9) lacks integration of the Township of Armour's formal notification procedures or clearly defined evacuation thresholds. Include detailed protocols aligned with the township's existing emergency management framework. The ERP needs detailed protocols for public notifications that align seamlessly with municipal emergency management practices to enhance public safety during an incident. Reference: CodeRED - https://www.armourtownship.ca/codered	Rev. 1 Section 7 and 9.3 provide notification and municipal mass-notification language; the CEMC is listed.	CLOSED.
3	Hazard Zones – Sections 8 and 9 describe the 100-foot exclusion zone around the battery enclosure and the provision of a 10-foot standoff distance for arc flash precautions. However, protocols for establishing Hot, Warm, and Cold Zones for the hazards defined in the ERP are not described therein. Clarify the procedures for defining and managing these distinct hazards zones around identified hazards, beyond just the exclusion zone, need to be clearly outlined. Reference: NFPA 1500	Rev. 1 Section 9.3 and Figures 24–25 show a 100 ft hot zone and additional 50 ft warm zone. The Q&A later proposes an initial 100 m air-monitoring zone.	CLOSED WITH TRACKED ACTION. The original hot/warm-zone comment has been addressed. Suggest that clarification of the distinct 100 m public-monitoring purpose under item 11 should be made; i.e. Both distances should not be labeled "exclusion zone."

¹ **Sources:** SolarBank ERP Doc. 875-001 Rev. 1 (August 21, 2025); SolarBank ERP Doc. No. 875-001 Rev. 0 (December 11, 2024), SolarBank Q&A (March 2, 2026, received August 27, 2026); Ontario Firefighter Guidance Note 6-53; Ontario Fire Code; NFPA 1; U.S. EPA BESS incident guidance and AEGLs; NIOSH IDLH guidance; Ontario Regulation 851.

NO.	REVIEWER COMMENT	SOLARBANK RESPONSE	UPDATED REVIEWER DISPOSITION
4	Incident Command Structure – Section 8.3 references a sample Incident Command Structure (ICS), but no diagram or organizational structure is provided. Clarify whether the Unified Command structure provided in section 8.2 is to be adopted for incident command or provide an alternative incident command structure. The ERP should provide a more granular breakdown of the SME's responsibilities and specific tasks tailored to different types of incidents, clarifying their integration and decision-making authority within the unified command structure. Reference: NFPA 1561	Rev. 1 Section 8.2 states: the event "will not be managed by one individual Incident Commander." Rev. 1 Section 8.3 states: The fire department retains full command authority over any incident, although it is highly recommended that operational decisions are coordinated with the BESS SME and site personnel on scene.	OPEN. Present wording is confusing and contradictory. Remove wording implying shared fireground authority. Suggested Wording: The fire department controls emergency scene operations. SolarBank, its ROC and its SME provide technical information and retain responsibility for operating or isolating site equipment. They must coordinate any actions affecting incident safety with the Incident Commander. Figure 23 references a SolarBank I/C. To be updated.
5	Incident Command Authority – Clarify explicitly throughout the ERP document that the Fire Department retains full command authority and will communicate directly with BESS staff through a designated liaison from the Fire Department.	Rev. 1 Section 8.3 expressly states that the fire department retains full command authority and allows direct contact with the SME.	CLOSED.
6	Post-Incident Decontamination Procedures – Section 10 omits procedures for firefighter decontamination and handling of contaminated PPE. Provide decontamination protocols for firefighters leaving the hot/warm zones. Also provide post incident decontamination requirements for contaminated PPE. Reference: NFPA 1072	The scope of the emergency response plan covers response to battery emergency scenarios. The purpose is to provide guidance to the Incident Commander on the site hazards and response tactics to mitigate a potential failure scenario. Decon is outside the scope of the plan. However, products of combustion identified in UL9540a large scale fire testing can also be found in ordinary residential fires so your existing post fire decontamination procedures should be followed.	CLOSED WITH TRACKED ACTION. PLC assumes that the Armour Fire Department has a PPE Hygiene and decontamination program in place that is in compliance with Firefighter Guidance Note 6-1. However, a review of the procedure should be completed to determine if the hazards found at the BESS would require the document to be updated.

NO.	REVIEWER COMMENT	SOLARBANK RESPONSE	UPDATED REVIEWER DISPOSITION
7	Training Program Detail – Section 11 lacks details on training curriculum, delivery methods, audience segmentation, instructor qualifications, and performance evaluation. Specifically include details of expected fire department support roles, such as ventilation operations. Where there is an expectation that the Fire Department may be required to support ventilation operations to reduce the possibility of explosive atmosphere development, this needs to be detailed in the training document. Provide a detailed training program document. Reference: NFPA 1001, NFPA 1072	A detailed Lesson plan has been provided and can be added as an appendix to the emergency response plan.	OPEN – The information provided does not include: 1. Role-specific objectives, 2. Lesson timings, 3. Instructor guide, 4. Practical site walk-through, 5. Scenario exercises, 6. Competence checks, 7. Attendance records, and 8. A refresher process. Where an Armour Fire Department training process and procedure is utilized to address one or more of the gaps identified above, these will be accepted by the Third-Party Reviewer.
8	Suppression Agents – Although CO₂, dry chemical, and Purple-K agents are mentioned, their deployment procedures, volumes, and equipment types are not described. Additionally, the ERP lacks a visual map identifying extinguisher types and locations. Clearly describe deployment procedures, agent quantities, and equipment types for CO₂, dry chemical, Purple-K, or other agents. Include a visual site map indicating extinguisher locations and ratings. Reference: NFPA 10, Best Practice, NFPA 855	The emergency response plan will be revised to remove any obligation that requires the fire department to use a fire extinguisher.	OPEN UNTIL INCORPORATED. Where fire extinguishers are required by code or the management of specific hazards, at minimum the ERP needs to provide their location, type, size and any specific instructions related to the site-specific hazards and extinguishing methods.
9	Fire Suppression System Details – The ERP describes the alarm annunciation (Section 5.3) but lacks detailed information on the activation procedures, manual override capabilities, maintenance schedules, and inspection requirements for any integrated fire suppression systems. Comprehensive procedures for the operation, override, and ongoing maintenance/inspection of the fire suppression systems are to be included in the ERP.	This is an emergency response plan that is limited to tactical guidance. It is not designed to provide information on inspection testing and maintenance associated with NFPA 72. This obligation belongs to SolarBank.	CLOSED WITH TRACKED ACTION. SolarBank shall provide the Chief Fire Official, upon request, with the Code-required inspection, testing, verification² and corrective-action records for the site's fire protection systems. Note: Testing shall be completed with the requirements of CAN/ULC-S536-2019 and not NFPA 72.

² Where a fire alarm system is required by the OBC, verification will need to be completed as per the requirements of CAN/ULC S537. The fire department may also require an approved cause-and-effect matrix and the S1001 integrated testing plan and report.

NO.	REVIEWER COMMENT	SOLARBANK RESPONSE	UPDATED REVIEWER DISPOSITION
10	Water Supply and Fire Flow Calculations – The ERP states that water will be supplied by fire department tankers (Section 2.1) but critically omits fire flow calculations, detailed water delivery strategies, or specifics on available drafting sites/hydrants. This section requires significant details, including precise fire flow calculations and comprehensive water delivery strategies, identifying all drafting/hydrant locations and their capacities.	Solarbank to provide a drafting hydrant as discussed with the fire services. Flow, pressure and appliances for water delivery were outlined in Section 9.3 (8). (1 ¼ line, 100 psi, 120 gpm = 7,200 gallons an hour)	CLOSED WITH TRACKED ACTION. Base on the information provided a 6" Dry Hydrant will be designed and installed to achieve the 500 gpm flow requirements as defined by Solarbank (Section 9.3 - A single handline intermittently flowing up to 250 gpm should be sufficient to provide adequate exposure cooling for the facility. In extreme situations, a second handline may be needed to protect additional exposures).
11	Evacuation Routes and Safety Zones – The ERP lacks clearly defined evacuation routes, an evacuation radius, and designated hold-and-secure zones. Clearly define evacuation routes, the evacuation radius, and designated hold-and-secure zones. Provide detailed maps and descriptions.	Air monitoring defines the need for shelter in-place or evacuation orders. Evacuation routes are defined by the AHJ not private industry. During a potential fire condition an exclusion zone of 100 meters is established to perform air monitoring. This distance was recommended by the <u>United States EPA</u> after having investigated prior BESS failures. This zone can be expanded on contracted based on actual readings. Similar BESS fires have failed to demonstrate any readings outside the perimeter of the facility that warranted public displacement. There are no residential structures within 100 meters of the site. New graphics have been added to the plan which outline the location and distances of all residential structures with the closest being 286 meters away.	CLOSED WITH TRACKED ACTION. The responder zones should be distinguished from the initial monitoring/public-protection area.
12	Comprehensive Evacuation Plan – Develop a thorough evacuation plan that addresses variables including wind direction, time of day, seasonal variations, and specific types of incidents to ensure effective emergency management and public safety.	This is an emergency response plan that provides guidance to the fire department on how to address a battery system emergency. It is not the place of a private entity to dictate to the AHJ how and when an evacuation should occur. We merely provide guidance on what to evaluate and the AHJ is charged with making those decisions. Evacuation plans must be developed by the AHJ who are familiar with the residential, industrial, and commercial landscapes within their community. It is reasonable to assume that you would be legally required to develop a master community-based response plan that incorporates all risk along with response triggers as we are sure there are many other hazards within your community.	OPEN. The ERP or the Training Curriculum should provide guidance or triggers that would assist the I/C when determining if the following measures were necessary: 1. Seal in Place 2. Evacuation Order

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13	Emergency Lighting and Backup Power – The ERP does not address provisions for emergency lighting or backup power for critical systems in the event of a power outage during an incident. Details on emergency lighting systems and backup power provisions for all critical systems within the facility are necessary.	The ERP is a guide that outlines the response to emergencies. It is not a standard operating procedure. To that point, upon loss of auxiliary power the battery systems are designed to enter into a safety shut down until aux power has been restored. This has nothing to do with the fire services and would not be mentioned in an emergency response plan. This is not an indoor facility that is staffed, which would require emergency lighting.	OPEN PENDING CONFIRMATION BACK-UP POWER. A statement has been included that states <i>“The fire detection and alarm system is connected to backup power that will allow the system to function in the event of a power failure.”</i>. Please confirm the EMS system is provided with backup power and duration the backup power will be available in a outage.
14	Emergency Shutdown Procedures – The ERP discusses autonomous equipment isolation by the EMS (Section 9.2) and mentions Lock Out/Tag Out (Section 10.3), but it lacks detailed, step-by-step emergency shutdown procedures for various critical systems (e.g., electrical, HVAC, battery management system) that might require manual intervention or specific coordinated actions by emergency personnel or BESS staff. Clear, sequential shutdown procedures for all critical systems are required.	The ERP is a guide for the fire services to manage emergencies; there is no expectation that the fire services would be engaging in any level or switching or electrical work which would clearly be in violation of your local safety rules for qualified electrical workers.	OPEN. The ERP states “Trouble equipment will be isolated from the facility grid autonomously by the EMS and relay protection schemes as appropriate.”. Specify who verifies automatic isolation, what happens if the autonomous shutdown fails; who can perform/confirm local isolation, who will be providing the I/C with the relevant information. Firefighter switching steps are not required.
15	Emergency Contacts – Update the ERP to include the Township of Armour’s Community Emergency Management Coordinator, Amy Tilley (705-382-3332), in the Emergency Contact List.	Amy Tilley (705-382-3332) now listed in Section 1.6	CLOSED.
16	Local Alarm Response – Section 5.3 (Alarm Enunciation) does not adequately address procedures for responding to local alarm activations given that the monitoring site is located four hours away. Provide clear and actionable guidance on immediate response steps when local alarms activate.	This is clearly defined in a step process that begins in section 9.3	OPEN. There are two items that are not adequately addressed in the ERP. 1. Section 3.11 states that the SME may not arrive for “approximately 2 hours”. What actions are the local responders to undertake during this time? 2. Section 9.2 states that upon arrival the I/C should contact the ROC to obtain a status briefing. What contingency plan is in place, if contact with ROC cannot be established?

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17	SolarBank Response Protocol – Clarify the protocol and provide specific anticipated response times for local SolarBank representatives during a significant emergency event. Clarify in Section 9.3 the expected arrival time of BESS Subject Matter Experts (SMEs) and indicate whether preliminary incident assessment actions should begin while SMEs are en route to the facility. Provide more detailed and concrete timelines for the arrival of other BESS staff and trained electricians during emergency conditions, as generalized terms are insufficient for planning and operational effectiveness.	Rev. 1 gives an on-site SME response target of less than two hours and allows external size-up before arrival.	CLOSED.
18	Alarm Notification Sequence – Clarify alarm notification sequences in Section 9. The ERP should explicitly indicate that the primary purpose of monitoring the company's notification is to provide timely alerts to the Fire Department. Notifications to other parties would be initiated post Fire Department notification.	Rev. 1 Section 7 includes a notification matrix and ROC sequence indicating fire-department notification.	CLOSED.
19	Mandatory Air Monitoring – Mandate and detail community air monitoring procedures during all active fire scenarios including stranded energy, cell venting, thermal runaway, large-scale fires, and explosions. The ERP needs to be revised to reflect that community air monitoring is a mandatory procedure during all specified active fire scenarios, not merely a consideration.	Rev. 1 Section 9.3 updated to state "Air monitoring should always be conducted to ensure safety and address community concerns."	OPEN. NIOSH (IDLH) values are strictly for occupational settings to help healthy adult workers escape a contaminated area and should not be used for determining evacuations. Measurement criteria such as Acute Exposure Guideline Level 2 (AEG-2) measurement criteria may be utilized in the ERP to establish substance-specific monitoring and protective-action criteria. Monitoring locations, decision criteria, responsibilities and public-notification triggers should be stated in the ERP
20	Roles and Notification Clarity – The ERP requires clear delineation of roles and responsibilities, specifying levels of notification and activation procedures (e.g., Full Alert vs. Stand-by) for distinct scenarios, ensuring accountability and clarity of actions during emergencies.	Rev. 1 Section 7–8 identify notification and command roles.	CLOSED.

NO.	REVIEWER COMMENT	SOLARBANK RESPONSE	UPDATED REVIEWER DISPOSITION
21	Comprehensive Scenario Coverage – The ERP lists four response scenarios (Section 9.4). While a "Transformer Fire" is depicted in a figure, it is not detailed as an explicit response scenario with associated tactics within the text of Section 9.4, nor are wildland fires impinging on the facility included. The ERP must expand its scenario coverage to include all plausible emergencies, specifically detailing hazards and tactical responses for events such as transformer fires and wildland fires threatening the facility. Clearly detail associated hazards and tactical responses for informed decision-making by emergency responders.	Rev. 1 Section 9.4 adds transformer/electrical failure and wildfire scenarios.	CLOSED. Note: Wildfire interface should be confirmed during site familiarization.
21A	Lightning Protection – The ERP does not address the potential impacts of a lightning strike on the facility, nor does it detail preventative measures or expected mitigation responses. Information on lightning protection, including potential impacts, preventative strategies, and mitigation responses, should be added.	The emergency response plan does not postulate every scenario, just the response to the outcome. If cells failed or there was a lightning strike, there potentially could be a fire. The plan explains the response posture to such an event. In addition, this is an emergency response plan. It is not an electrical specification document that outlines bonding, grounding and other requirements associated with NFPA 70 which is part of the design.	CLOSED. Grounding/lightning design to be reviewed separately.
22	Post-Incident Procedures – Clarify specific post-incident procedures including billing responsibilities to SolarBank for emergency services rendered and related administrative processes.	This is an ERP that outlines the response to site emergencies. This is not a financial agreement that should be executed separately from this agreement. We do not disagree with the request, just it's inclusion into the document.	CLOSED.
23	Post-Incident Environmental Remediation – The ERP does not include procedures for post-incident environmental remediation, such as spill containment, hazardous waste disposal beyond general "disposal", or soil/water contamination assessment. Detailed procedures covering spill containment, hazardous waste disposal, and environmental assessment for soil and water contamination are critical additions.	The ERP provides response guidance to mitigate risk from an equipment failure at a BESS facility. It should be noted that when battery cells fail, they do not release any liquid. The electrolyte is expelled as a gas. Since suppression is not recommended the only water use is for asset protection on uninvolved equipment. So, runoff would be similar to that of rainwater. Ultimately, it will be up to the Ministry of the Environment if post-incident sampling is required.	OPEN. Add immediate spill/runoff and debris controls, responsible environmental contact and regulatory notification/assessment handoff. A detailed recovery plan may be separately referenced; reconcile the conflicting source statements.
24	Additional Comment – Ontario lockout reference Rev. 1 Section 10.3 cites U.S. OSHA 29 CFR 1910.147 as the required rule at an Ontario site.		OPEN. Replace the U.S. legal citation with the applicable Ontario framework and qualified-person procedure, after checking which occupational regulation applies. For industrial establishments, O. Reg. 851 includes electrical/lockout provisions.

NO.	REVIEWER COMMENT	SOLARBANK RESPONSE	UPDATED REVIEWER DISPOSITION
25	Additional Comment – SME description and document quality. Rev. 1 Section 8.1 describes the SME as familiar with the “DDDD.” Some command wording and cross-references need editorial review.		OPEN. Replace the placeholder with the intended equipment/system description; check zone labels, figure/table references, named roles and revision references before issuing the next controlled ERP.
26	Additional Comment – Section 2.1 now references NFPA 1 in lieu of the reference to OBC Section 3.2.5 – OFC Section 2.5.		OPEN. The use of an American Standard in place of the Ontario Fire Code requirement, needs to be justified.