

Emergency Response Plan Q&A - March 2nd 2026

NO.	REVIEWER COMMENT	POWERBANK DISPOSITION	REVIEWER CONCURRENCE
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. <i>Reference: NFPA 1970</i>	Section 6.1.6 now recommends PPE compliant with NFPA 1970 (superseding 1971)	Resolved
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. <i>Reference: CodeRED - https://www.armourtownship.ca/codered</i>	Section 9.3 includes community air monitoring and public notification.	Resolved
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. <i>Reference: NFPA 1500</i>	Figures 24–25 and Section 9.3 now provide Hot, Warm and Cold zones	Resolved
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. <i>Reference: NFPA 1561</i>	Sections 8.2 & 8.3 include full Unified and Incident Command Structure graphics and detailed SME tasks	Resolved
5	Incident Command Authority – Clarify <u>explicitly</u> 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.	Section 8.3 explicitly states Fire Department retains full command authority	Resolved

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. <i>Reference: NFPA 1072</i>	Post-incident decontamination protocols are not described in Section 10.	Outstanding
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Response Q6: 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.

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. <i>Reference: NFPA 1001, NFPA 1072</i>	Section 11 exists but lacks details including curriculum and frequency of training, etc. This section should reference the formal training program in development.	A formal training program is in development and will provide to the Township of Armour. Section 11 should reference this formal training program
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Response Q7: A detailed Lesson plan has been provided and can be added as an appendix to the emergency response plan.

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. <i>Reference: NFPA 10, Best Practice, NFPA 855</i>	Fire Extinguisher types have now been defined, however, a map as to the location of the extinguishers has not been provided.	Partial
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Response Q8: The emergency response plan will be revised to remove any obligation that requires the fire department to use a fire extinguisher.

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.	Section 5 covers detection but not manual override or maintenance	Partial
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Response Q9: 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.

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.	Section 2.1 and 9.3 reference “Draft Water Analysis 11-20-2024” but no flow calculations	Partial
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Response Q10: 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 ¾ line, 100 psi, 120 gpm = 7,200 gallons an hour)

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.	Section 9.3 mentions evacuation radius and mass notification, but no maps	Partial
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Response Q11: 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 United States EPA 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.

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.	General guidance added but no wind/time-of-day matrix	Partial
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Response Q12: 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.

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.	Not addressed in Rev 1	Outstanding
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Response Q 13: 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.

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.	Section 10.3 (LOTO) covered but lacks step-by-step manual actions	Partial
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Response Q 14: 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 of switching or electrical work which would clearly be in violation of your local safety rules for qualified electrical workers.

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	Resolved
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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.	Section 5.2 notes alarm flow to ROC but local action still unclear.	Partial
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Response Q 16: This is clearly defined in a step process that begins in section 9.3

17	SolarBank Response Protocol – 1. Clarify the protocol and provide specific anticipated response times for local SolarBank representatives during a significant emergency event. 2. 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. 3. 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.	Section 3.11 adds 2-hour SME arrival standard	Resolved
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.	Section 7 adds Notification Matrix and ROC sequence	Resolved
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.	Section 9.3 explicitly requires air monitoring during active fires	Resolved
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.	Sections 8.2 & 8.3 include full Unified and Incident Command Structure graphics and detailed SME tasks	Resolved

21	Lighting 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.	Not included	Outstanding
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Response Q 21: 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 party of the design.

22	Post-Incident Procedures – Clarify specific post-incident procedures including billing responsibilities to SolarBank for emergency services rendered and related administrative processes.	Not included	Outstanding
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Response Q 22: 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.

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.	No specific spill or hazmat remediation section	Outstanding
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Response Q 23: 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