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TOWNSHIP OF ARMOUR

Third-Party Review Report

Emergency Response Plan - Battery Energy Storage System (BESS)

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June 24, 2025

PLC-ARMOUR-P2738-ERP-TPR-D

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REVISION HISTORY

REVISION NO.	ISSUE DATE	DESCRIPTION OF REVISION
0	2025-XX-XX	Initial Issue

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Table 1 – Review of ERP	6
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ABBREVIATIONS

ABBREVIATION	DESCRIPTION
BESS	Battery Energy Storage System
BFD	Burk's Falls & District Fire Department
BMS	Battery Management Systems
EMS	Energy Management System
COF ₂	Carbonyl fluoride
CO	Carbon monoxide
CO ₂	Carbon Dioxide
CDC	Centers for Disease Control
ERP	Emergency Response Plan
H ₂	Hydrogen Gas
HF	Hydrogen Fluoride
HFC	Hydrofluorocarbon
ICS	Incident Command System
IDLH	Immediate Dangerous to Life or Health
LFP	Lithium Iron Phosphate
OPI	Opportunity for Improvement
PCS	Power Conversion System
PLC	PLC Fire Safety Engineering
PPE	Personal Protective Equipment
SCBA	Self Contain Breathing Apparatus
SDS	Safety Data Sheet
SME	Subject Matter Expert
SOC	State of Charge
TOA	Township of Armour
TPR	Third Party Review
UCS	Unified Command System

1. INTRODUCTION

The Township of Armour (TOA) is a municipality situated within the Almaguin Highlands region of Parry Sound District, Ontario, surrounding but excluding the Village of Burk's Falls.

The TOA council is evaluating the proposed installation of a 4.99 MW Battery Energy Storage System (BESS) at the SolarBank Project 903 site, located at 219 Peggs Mountain Road. The proposed project comprises nine identical energy storage containers, five inverters, two transformers, overhead connection poles interfacing with the Hydro One 44kV distribution system and associated auxiliary electrical equipment. Lithium Iron Phosphate (LFP) (LiFePO_4) batteries will serve as the energy storage medium for this system.

SolarBank has developed an Emergency Response Plan (ERP) (Document No. 875-001 Peggs Mountain BESS ERP Rev 0), for the SolarBank Project 903 facility. PLC Fire Safety Engineering (PLC) was contracted to conduct an independent Third-Party Review (TPR) of this plan. This report summarizes the findings of PLC's review.

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2. SCOPE AND OBJECTIVE

The scope of this TPR was limited to a review of the ERP and associated documents. The ERP and other documentation provided for review is listed in APPENDIX B of this report.

The objective of this TPR was to determine if the ERP is aligned with the requirements of the following codes and standards and to confirm that the intended level of firefighter safety is maintained:

- NFPA 1072 - Standard for Hazardous Materials/Weapons of Mass Destruction Emergency Response Personnel Professional Qualifications, 2017 Edition [R-1];
- NFPA 855 - Standard for the Installation of Stationary Fuel Cell Power Systems, 2023 Edition [R-2];
- NFPA 1001 - Standard for Fire Fighter Professional Qualifications, 2019 Edition [R-3];
- NFPA 1002 - Standard for Fire Apparatus Driver/Operator Professional Qualifications, 2017 Edition [R-4];
- NFPA 1970 - Standard on Protective Ensembles for Structural and Proximity Firefighting, Work Apparel, Open-Circuit Self-Contained Breathing Apparatus (SCBA) for Emergency Services, and Personal Alert Safety Systems (PASS), 2025 Edition [R-5];
- NFPA 2800 - Standard on Facility Emergency Action Plans, 2023 Edition [R-6];
- NFPA 780: Standard for the Installation of Lightning Protection Systems, 2026 Edition [R-13];
- Other applicable codes and standards referenced therein; and
- Industry Best Practices.

The documentation was reviewed to determine if the proposed ERP was adequate for mitigating the fire hazards presented by the BESS facility and their potential impacts on firefighter and community safety.

3. METHODOLOGY

The methodology implemented for this review was as follows:

1. An introductory meeting was held with Armour Township staff to confirm the scope of work and other pertinent background information for the project. No site inspections were performed.
2. The hazards as defined in the ERP and their respective safety data sheets were reviewed to determine their impact on a response to an emergency. A list of the documentation reviewed is included in APPENDIX B.
3. The ERP was reviewed to determine if it adequately addressed the hazards related to the BESS facility. Deviations from the codes and standards referenced in Section 2 along with clarification requests were documented in APPENDIX A for response by SolarBank.
4. Conclusions regarding this third-party review were documented in Section 6 of this report.

4. PLC PROJECT TEAM

4.1. PROJECT MANAGER

Sam Zareian, EIT, RHFAC, MASc., is a Technical Specialist at PLC, specializing in fire protection, code consulting, and accessibility compliance. With a research-focused background in mechanical engineering and over five years of experience, she has contributed to fire and life safety reviews, hazard assessments, and fire safety plan development for diverse projects across Canada. Sam is highly skilled in building code compliance, performance-based fire protection solutions, fire modeling, and site audits, ensuring that projects align with Ontario and National Building & Fire Codes, NFPA, and CSA Standards.

4.2. TECHNICAL LEAD

Rudy Cronk is a principal at PLC, currently holds the position of Vice President of Business Development. With 35 years of extensive experience in the fire protection industry, Mr. Cronk is a highly experienced Senior Fire Officer with a background spanning both municipal and industrial fire protection.

Mr. Cronk has occupied Chief Officer roles in various municipal and private sector organizations. He is a graduate of the Ontario Fire College's fire technology program and remains actively engaged in fire protection committees, including CSA N293 and N393. His notable contributions include pivotal roles in the development of the Town of Haldimand recruit training program, amalgamation transition committee for the Haldimand County Fire Department, and serving on the Canadian Association of Fire Chiefs (CAFC) Codes Committee.

4.3. INTERNAL REVIEWER

Ghaith Qamheiah, P. Eng. is a principal of PLC where he currently serves in the role of President. Mr. Qamheiah holds a Bachelor of Engineering degree from McMaster University in Chemical Engineering, as well as professional engineering designations in Ontario, Manitoba, Saskatchewan and British Columbia.

Mr. Qamheiah has 20+ years of experience in fire and life safety engineering consulting primarily focused on fire hazard assessments, code and intent analysis, development of alternative solutions and performance-based designs, and review of building and fire safety system designs.

5. EVALUATION

5.1. General

The Peggs Mountain BESS Emergency Response Plan (ERP) presents a generally comprehensive and site-specific framework intended to guide emergency responders in managing incidents at the SolarBank facility located in Armour Township, Ontario. The ERP provides a general response structure by identifying key hazards, prescribing tactical response strategies, and supporting coordinated incident management under a Unified Command model. However, certain gaps limit its overall effectiveness as a fully actionable emergency planning document.

The plan effectively establishes its purpose and scope, emphasizing multi-agency coordination between fire service personnel, BESS Subject Matter Experts (SMEs), and local stakeholders. The facility's rural setting, with adjacent residential and commercial exposures necessitates a robust risk mitigation approach. The ERP reflects this with a thorough inventory of chemical (e.g., LFP off-gassing, hydrogen, R-410A refrigerant, and FR3 oil), electrical (e.g., stranded energy and arc flash), and physical hazards (e.g., thermal runaway and explosion potential). Protective measures for firefighters, including exclusion zones, Personal Protective Equipment (PPE) and the use of SCBA, however additional information has been identified which is necessary to address several gaps.

Operational response guidance is well-structured through scenario-specific tactical matrices covering likely emergencies, including cable failures, cell malfunctions, full battery enclosure involvement, and PCS equipment failures. Each scenario outlines expected suppression agents (CO₂, dry chemical, or Purple-K), fire classifications, and operational considerations such as the required 100-foot exclusion zone. The ERP appropriately reinforces a defensive, non-intervention posture for fully involved enclosures, reflecting modern best practices for lithium-ion incidents. Additionally, post-incident phases—such as tiered stand-down periods and lockout/tagout procedures—are addressed, though further clarification on criteria for re-entry and decommissioning steps would strengthen the plan.

The ERP references the implementation of a Unified Command structure but lacks a finalized graphic of the Incident Command Structure (ICS), which limits its utility as a field reference. Furthermore, while the role of the SME is emphasized, particularly in conducting incident size-up, analyzing EMS data, and initiating equipment isolation, more defined protocols for decision-making authority within Unified Command would benefit responders.

The Emergency Management System (EMS) is identified as a central tool for hazard detection, communication, and equipment control. However, the ERP could be improved by providing more detailed workflows on EMS-alarm integration with tactical response actions.

The training provisions outlined in the ERP are generally consistent with industry standards. Annual training for the Burk's Falls & District Fire Department (BFD) is mandated, with coverage of hazard identification, suppression tactics, and stabilization protocols. Training requirements align with NFPA 855, but the plan would benefit from a more detailed curriculum, competency verification methods, and provisions for periodic refresher training.

5.2. EVALUATION SUMMARY

PLC conducted a TPR of the Peggs Mountain BESS ERP. The evaluation assessed the completeness, clarity, and operational applicability of the ERP against recognized standards, best practices, and the specific needs of first responders.

The ERP was reviewed against the codes and standards listed in Section 2 of this report. Table 1 summarizes the evaluation.

Table 1 – Review of ERP

Review Item	Compliance	Referenced Doc.
Section 1 – General Information	Acceptable	
Section 2 – Energy Storage Information	Acceptable	
Section 3 Definitions & Acronyms	Acceptable	
Section 4 – Energy Management System	Acceptable	
Section 5 – Detection and Suppression System	Acceptable	
Section 6 – Hazards	Two (2) Item for Clarification	NFPA 1970 [R-5] NFPA 780 [R-13]
Section 7 – Notifications	Four (4) Item for Clarification	TWSP of Armour website, Industry Best Practices
Section 8 – Unified Command	Four (4) Items for Clarification	NFPA 1500 [R-7] – NFPA 1561 - Province of Ontario Mutual Aid Plan – NFPA 1720 [R-9]
Section 9 – Response Tactics	Ten (10) Items for Clarification	NFPA 10 [R-10], Best Practice – NFPA 1408 [R-11]– NFPA 855 [R-2] – NFPA 1500 [R-7] – NFPA 1408 [R-11] Industry Best Practices
Section 10 – Post Incident Operations	Three (3) Item for Clarification	NFPA 1072 [R-1] Industry Best Practices
Section 11 – Training	Two (2) Item for Clarification	NFPA 1001 [R-1] – NFPA 1072 [R-1]

The review identified nine (9) items for clarification relating to ICS documentation, public notification protocols, and training program detail. The items are documented in APPENDIX A and await disposition by SolarBank.

6. CONCLUSIONS

SolarBank is proposing the installation of a utility-scale Battery Energy Storage System (BESS) consisting of nine (9) Lithium Iron Phosphate (LiFePO_4) battery enclosures and has developed an accompanying ERP for the facility.

PLC Fire Safety Engineering has completed a third-party review of the ERP prepared by SolarBank to assess its alignment with applicable codes, standards, and best practices. This review, conducted on behalf of the Burk's Falls & District Fire Department, identified nine (9) clarification items, which are detailed in APPENDIX A for consideration and resolution by the project proponents.

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7. REFERENCES

- [R-1] National Fire Protection Association, NFPA 1072 – “Standard for Hazardous Materials/Weapons of Mass Destruction Emergency Response Personnel Professional Qualifications”, 2017 Edition
- [R-2] National Fire Protection Association, NFPA 855 – “Standard for the Installation of Stationary Fuel Cell Power Systems”, 2023 Edition
- [R-3] National Fire Protection Association, NFPA 1001 – “Standard for Fire Fighter Professional Qualifications”, 2019 Edition
- [R-4] National Fire Protection Association, NFPA 1002 – “Standard for Fire Apparatus Driver/Operator Professional Qualifications”, 2017 Edition
- [R-5] National Fire Protection Association, NFPA 1970 – “Standard on Protective Ensembles for Structural and Proximity Firefighting, Work Apparel, Open-Circuit Self-Contained Breathing Apparatus (SCBA) for Emergency Services, and Personal Alert Safety Systems (PASS)”, 2025 Edition
- [R-6] National Fire Protection Association, NFPA 2800 – “Standard on Facility Emergency Action Plans”, 2023 Edition
- [R-7] National Fire Protection Association, NFPA 1500 – “Standard on Fire Department Occupational Safety, Health, and Wellness Program”, 2021 Edition
- [R-8] National Fire Protection Association, NFPA 1561 – “Standard on Emergency Services Incident Management System and Command Safety”, 2020 Edition
- [R-9] National Fire Protection Association, NFPA 1720 – “Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Volunteer Fire Departments”, 2020 Edition
- [R-10] National Fire Protection Association, NFPA 10 – “Standard for Portable Fire Extinguishers”, 2022 Edition
- [R-11] National Fire Protection Association, NFPA 1408 – “Standard for Training Fire Service Personnel in the Operation, Care, Use, and Maintenance of Thermal Imagers”, 2020 Edition
- [R-12] Ontario Electrical Safety Code, 2024 Edition.
- [R-13] National Fire Protection Association 780: Standard for the Installation of Lightning Protection Systems, 2026 Edition

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APPENDIX A

Items for Clarification

DISPOSITION OF FINDINGS

NO.	REVIEWER COMMENT	SOLARBANK DISPOSITION	REVIEWER CONCURRENCE
1	<p>PPE Standard Reference - Section 6.1.6 references NFPA 1971 and not the latest version of the standard for PPE NFPA 1970.</p> <p>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.</p> <p><i>Reference: NFPA 1970</i></p>		
2	<p>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.</p> <p>The ERP needs detailed protocols for public notifications that align seamlessly with municipal emergency management practices to enhance public safety during an incident.</p> <p><i>Reference: CodeRED - https://www.armourtownship.ca/codered</i></p>		

NO.	REVIEWER COMMENT	SOLARBANK DISPOSITION	REVIEWER CONCURRENCE
3	<p>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.</p> <p>Clarify the procedures for defining and managing these distinct hazards zones around identified hazards, beyond just the exclusion zone, need to be clearly outlined.</p> <p><i>Reference: NFPA 1500</i></p>		

NO.	REVIEWER COMMENT	SOLARBANK DISPOSITION	REVIEWER CONCURRENCE
4	<p>Incident Command Structure - Section 8.3 references a sample Incident Command Structure (ICS), but no diagram or organizational structure is provided.</p> <p>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.</p> <p>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.</p> <p><i>Reference: NFPA 1561</i></p>		
5	<p>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.</p>		

NO.	REVIEWER COMMENT	SOLARBANK DISPOSITION	REVIEWER CONCURRENCE
6	<p>Post-Incident Decontamination Procedures - Section 10 omits procedures for firefighter decontamination and handling of contaminated PPE.</p> <p>Provide decontamination protocols for firefighters leaving the hot/warm zones. Also provide post incident decontamination requirements for contaminated PPE.</p> <p><i>Reference: NFPA 1072</i></p>		
7	<p>External Resource Coordination - Although the ERP references local fire services, it lacks protocols for engagement with mutual aid departments or hazmat contractors.</p> <p>Define clearly in the ERP how mutual aid departments and hazardous materials contractors will be engaged, including roles and responsibilities of each agency.</p> <p><i>Reference: Province of Ontario Mutual Aid Plan/NFPA 1720</i></p>		

NO.	REVIEWER COMMENT	SOLARBANK DISPOSITION	REVIEWER CONCURRENCE
8	<p>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.</p> <p>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.</p> <p>Provide a detailed training program document. <i>Reference: NFPA 1001, NFPA 1072</i></p>		
9	<p>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.</p> <p>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.</p> <p><i>Reference: NFPA 10, Best Practice, NFPA 855</i></p>		

NO.	REVIEWER COMMENT	SOLARBANK DISPOSITION	REVIEWER CONCURRENCE
10	<p>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.</p> <p>Comprehensive procedures for the operation, override, and ongoing maintenance/inspection of the fire suppression systems is to be included in the ERP.</p>		
11	<p>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.</p> <p>This section requires significant details, including precise fire flow calculations and comprehensive water delivery strategies, identifying all drafting/hydrant locations and their capacities.</p>		

NO.	REVIEWER COMMENT	SOLARBANK DISPOSITION	REVIEWER CONCURRENCE
12	<p>Thermal Imaging Camera (TIC) Use - The ERP notes that thermal imaging is required during a response to a fully involved battery container, but it does not define who supplies the TIC, its specifications, or who performs the assessment.</p> <p>Clarify responsibility for providing the TIC, detail its required specifications, and identify who will perform thermal assessments during incidents.</p> <p><i>Reference: NFPA 1408</i></p>		
13	<p>Evacuation Routes and Safety Zones - The ERP lacks clearly defined evacuation routes, an evacuation radius, and designated hold-and-secure zones.</p> <p>Clearly define evacuation routes, the evacuation radius, and designated hold-and-secure zones. Provide detailed maps and descriptions.</p>		
14	<p>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.</p>		

NO.	REVIEWER COMMENT	SOLARBANK DISPOSITION	REVIEWER CONCURRENCE
15	<p>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.</p> <p>Details on emergency lighting systems and backup power provisions for all critical systems within the facility are necessary.</p>		
16	<p>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.</p> <p>Clear, sequential shutdown procedures for all critical systems are required.</p>		
17	<p>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.</p>		

NO.	REVIEWER COMMENT	SOLARBANK DISPOSITION	REVIEWER CONCURRENCE
18	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.		
19	SolarBank Response Protocol – <ol style="list-style-type: none"> 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. 		

NO.	REVIEWER COMMENT	SOLARBANK DISPOSITION	REVIEWER CONCURRENCE
20	<p>Alarm Notification Sequence - Clarify alarm notification sequences in Section 9.</p> <p>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.</p>		
21	<p>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.</p> <p>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.</p>		
21	<p>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.</p>		

NO.	REVIEWER COMMENT	SOLARBANK DISPOSITION	REVIEWER CONCURRENCE
22	<p>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.</p> <p>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.</p> <p>Clearly detail associated hazards and tactical responses for informed decision-making by emergency responders.</p>		
23	<p>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.</p> <p>Information on lightning protection, including potential impacts, preventative strategies, and mitigation responses, should be added.</p>		
24	<p>Post-Incident Procedures - Clarify specific post-incident procedures including billing responsibilities to SolarBank for emergency services rendered and related administrative processes.</p>		

NO.	REVIEWER COMMENT	SOLARBANK DISPOSITION	REVIEWER CONCURRENCE
25	<p>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.</p> <p>Detailed procedures covering spill containment, hazardous waste disposal, and environmental assessment for soil and water contamination are critical additions.</p>		

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APPENDIX B

Documents Review

Document Number	Document Name	Rev.	Issue Date	Document Type
Document No. 875-001 Peggs Mountain BESS	FIRE & RISK ALLIANCE - EMERGENCY RESPONSE PLAN - SOLARBANK	0	2024-12-11	Document
SOLARBANK 875-002	FIRE & RISK ALLIANCE - BATTERY ENERGY STORAGE FIRE SUPPRESSION SYTEMS			Document

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