

DOCKETED	
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Document Title:	Letter from County of Los Angeles Fire Department Regarding Opt-In Application, Prairie Song Reliability Project
Description:	N/A
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*"Proud Protectors of Life,
the Environment, and Property"*

COUNTY OF LOS ANGELES FIRE DEPARTMENT

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September 18, 2025

Lisa Worrall
Project Manager
California Energy Commission
lisa.worrall@energy.ca.gov

Dear Ms. Worrall:

THE NOTICE OF RECEIPT OF OPT-IN APPLICATION, PRAIRIE SONG RELIABILITY PROJECT, PROPOSES TO CONSTRUCT, OWN, AND OPERATE A 1,150-MEGAWATT BATTERY ENERGY STORAGE SYSTEM CONSTRUCTED ON PRIVATELY OWNED LAND. THE PROJECT WOULD CONNECT TO THE EXISTING SOUTHERN CALIFORNIA EDISON VINCENT SUBSTATION VIA THE GENERATION INTERTIE LINE ROUTE, CITY OF ANTELOPE VALLEY, FFER2025003370

The Notice of Receipt of Opt-In Application was reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

We have no comments.

For any questions regarding this response, please contact Mamikon Nalchajyan, at (213) 466-5596 or Mamikon.Nalchajyan@fire.lacounty.gov.

LAND DEVELOPMENT UNIT:

The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants. Construction plans shall be submitted to the LA County Fire Department for review and approval prior to issuance of the building permit.

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Before any permit is issued, applicant shall submit and obtain approval from the Fire Department of all necessary facility plans, including but not limited to necessary requests for variance(s) from the default prescriptive requirements of the Los Angeles County Fire Code [i.e., requests for “use an alternate material, assembly of materials, equipment, method of construction, method of installation of equipment or means of protection” (2023 LACFC §104.10)]. Said requests from the Fire Department shall be obtained from the County of Los Angeles Fire – Fire Prevention Division, Engineering Section, bear the signature of the County of Los Angeles Fire Marshal, and be submitted to the jurisdictional Building and Safety Office.

The proposed development may necessitate multiple locations for ingress/egress from the property's private on-site fire apparatus roadways to a public access roadway for emergency response to access the facility.

This property is located within the area described by the Fire Department as a Fire Hazard Severity Zone. The development of this project must comply with all applicable code and ordinance requirements for brush clearance and vegetation management programs. The preparation of a Fuel Modification Plan may be required.

The County of Los Angeles Fire Department, Land Development Unit appreciates the opportunity to comment on this project. Should any questions arise, please contact Juan Padilla at (323) 890-4243 or Juan.Padilla@fire.lacounty.gov.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, brush clearance, vegetation management, fuel modification for Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance

For any questions regarding this response, please contact Forestry Assistant, Matthew Ermino at (818) 890-5719.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division (HHMD) of the County of Los Angeles Fire Department is the Certified Unified Program Agency (CUPA) with regulatory environmental oversight of the Prairie Song Reliability Project for its handling of hazardous materials and hazardous wastes. The application for the project has been reviewed, and the following comments are as follows:

- A Hazardous Materials Business Plan (HMBP) must be prepared prior to the commencement of construction activities and during the operations. The HMBP, including the hazardous materials inventory, must be submitted to the California Environmental Reporting System (CERS) in compliance with Chapter 6.95 of the California Health and Safety Code (HSC) and Title 19, Division 5, Chapter 1 of the California Code of Regulations (CCR). (Sections 2.4.12 & 2.5.2)

- Hazardous waste manifests must be retained for a minimum of three years from the date the waste is accepted by the initial transporter. (Section 2.4.12 & 2.5.3)
 - Based on California Code of Regulations Title 19 § 5130.6 Table 3, Sulfuric acid fails the evaluation pursuant to Section 25532(g)(2) of the HSC but remains listed as a Regulated Substance only under the following conditions:
 - a) If concentrated with greater than 100 pounds of sulfur trioxide or the acid meets the definition of oleum. (The Table 3 threshold for sulfur trioxide is 100 pounds.) (The Table 1 threshold for oleum is 10,000 pounds.)
 - b) If in a container with flammable hydrocarbons (flash point < 73° F).
- Does the sulfuric acid in the control house discussed in Section 3.5 qualify as a regulated substance based on the above conditions?
- Once construction begins, the facility must obtain a CUPA permit for hazardous materials, hazardous waste, and any other applicable CUPA programs from LA County Fire Department CUPA. These permits may remain in effect during operation if the applicable CUPA programs are still required.
- In addition to the railroad soil testing referenced in Section 3.5.4.1 of the application, HHMD advises that semi-volatile organic compounds, EPA Method 8270, and pesticides, EPA Method 8080 be included in the soil testing analyses.

Please contact HHMD Hazardous Materials Specialist III, Michael Bravo at (323) 890-4031 if you have any questions.

Very truly yours,



RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

RMD:pg