

DOCKETED	
Docket Number:	24-OPT-05
Project Title:	Corby Battery Energy Storage System Project
TN #:	271790
Document Title:	Ruthie Brock Comments - The impacts of LFP FIRE cannot be mitigated for sensitive receptors
Description:	N/A
Filer:	System
Organization:	Ruthie Brock
Submitter Role:	Public
Submission Date:	8/2/2026 12:27:42 PM
Docketed Date:	8/3/2026

*Comment Received From: Ruthie Brock
Submitted On: 8/2/2026
Docket Number: 24-OPT-05*

The impacts of LFP FIRE cannot be mitigated for sensitive receptors

Additional submitted attachment is included below.

The impacts of a lithium iron phosphate battery fire at a BESS cannot be completely or even significantly mitigated for sensitive receptors.

FACT---The EPA has set a safety buffer of 330 feet for firefighters during a lithium-ion BESS failure incident. Firefighters have full PPE. Residents in proximity of a lithium-ion BESS project do not.

The risks associated with burning lithium iron phosphate batteries cannot be totally or even significantly mitigated, because response to battery fires are only be *reactive, not proactive*.

Manufacturing defects, battery cell damage, installation errors, management system failures are among the many reasons a battery cell can fail. A battery failure is only detected after it has begun, not before. Once propagation initiates during thermal runaway, it cannot be stopped and quickly escalates to a fire.

Once that fire starts, the current protocol is to let the battery burn, allowing it to consume itself and the stranded energy within. First responders do nothing but apply water to adjacent exposures to prevent other containers from becoming involved, because they now know that the battery fire cannot be successfully fully suppressed and extinguished. And re-igniting is more likely if the batteries are not allowed to consume themselves.

The majority of the toxic HF that is produced by the battery fire is released in the first few minutes, long before any on-site air testing has begun. Therefore accurate air sampling would have to begin within the early minutes of the failure event starting, not merely when flame is visible or even hours later when the EPA comes on scene.

The electrolyte within the batteries actually begins decomposing during the overheating stage, prior to any active visible fire. Each mole of the lithium-hexafluorophosphate (LiPF_6), which are conductive salts in the electrolyte, contains 6 moles of fluorine. This fluorine release quickly converts to HF during the initial exothermic part of the failure and continues during the burning process, yet will not likely be included in the delayed onsite air sampling that will start after onset of fire.

This conversion of the electrolyte is analyzed in comments submitted on May 21, 2026 by Jacqueline Ayer of Save Our Rural Town in the Prairie Song Reliability Project docket in (TN270152).

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=270152&DocumentContentId=107314>

Air sampling, regardless of when it begins, does nothing to mitigate the release of the toxic gases or particulate. Measuring these gases being expelled also does nothing to prevent the expulsion, it only confirms concentration levels.

Wind speeds at the time of a battery failure event will also be a variable factor that must be taken into consideration for sensitive receptors.

The CEC must base their decisions on the worst case scenario. And the only way to truly mitigate the risks of Lithium Iron Phosphate batteries during a failure event is through siting. **Safe siting = remote siting.** The CEC has already set a precedent by approving three safely-sited BESS that are more remote and far from sensitive receptors. The proposed location for the Corby does not meet that bar. The Lambie Industrial Park location would be much more inline with prior CEC BESS safety thresholds and project approvals.

Please deny the Corby BESS in the proposed location due to its proven risks to sensitive receptors which cannot be mitigated-- except through safe siting.

