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Formal Opposition to Corby BESS Inadequate Toxic Plume Modeling, Insufficient Firefighting Resources, and Failure to Analyze a

Additional submitted attachment is included below.

Dear Commissioners,

My name is Alex Carpineta. I am writing to express opposition to the Corby Battery Energy Storage System (BESS) Project Staff Assessment in which the CEC is recommended approval. In its current form due to serious deficiencies in its smoke, toxic gas, water supply, staffing, and overall risk assessment analysis. The project relies heavily on idealized, laboratory scale computer simulations that do not accurately represent the unpredictable and catastrophic nature of an actual lithium ion thermal runaway fire. The applicant has not provided any guarantee that toxic smoke produced during such an event will not reach nearby homes, leaving surrounding residents and agricultural areas exposed to unacceptable and health risks. I have family and grandparents who will be in direct contact with this smoke in the event of a fire, leading to a high risk of severe health issues.

The current toxic smoke plume assessment relies on theoretical AERMOD dispersion modeling using laboratory based UL 9540A testing, literature compilations, and small scale forced failure assumptions, rather than full scale real world testing. These laboratory tests deliberately minimize wind effects and fail to replicate prolonged, multi unit outdoor fires. As demonstrated by real world incidents like the 2025 Moss Landing fire and the 13 hour Escondido fire in 2024, outdoor containerized BESS fires routinely burn for many hours or even days, producing toxic emissions including hydrogen fluoride (HF), nitrogen dioxide (NO₂), hydrogen chloride (HCl), and hydrogen cyanide (HCN). The output of any simulation is entirely dependent on weather conditions such as wind direction, wind speed, temperature, and atmospheric stability, all of which constantly change. With the nearest residential receptor located just a few feet away, even a small, unexpected shift in wind direction could send hazardous concentrations of toxic gases directly toward neighboring homes and agricultural lands. We are essentially being asked to accept a “best case scenario” projection instead of a scientifically validated, worst case emergency planning analysis.

Additionally, the current risk evaluation only considers a single container experiencing thermal runaway over an assumed 6 hour fire or 10 hour non fire off gassing period. This does not reflect the realistic maximum hazard presented by the site. A true and responsible analysis must include a cascading, multi container failure scenario, as this could occur from a major power system malfunction, seismic activity, or even a targeted cyberattack that disables safety controls. Emergency response agencies do not prepare based on optimistic outcomes, and neither should the Commission. A comprehensive air plume dispersion analysis must define evacuation and shelter in place zones using concentrations that reflect Immediately Dangerous to Life or Health thresholds, not lab derived assumptions that underestimate cumulative harm.

This risk is further compounded by critical flaws in emergency response planning and fire protection infrastructure. The Dixon Fire Department requested 9 additional staff members to support operations for this massive facility, but that request was denied. Furthermore, it remains

completely unclear what funding or financial agreements the fire department will receive, or whether those amounts will ever be sufficient to support a safe emergency response for a project of this scale. Why isn't that public information? On top of these operational deficits, the applicant proposes a single 24,000 gallon on site water tank. Both California Energy Commission staff and the Dixon Fire Department (DFD) have explicitly stated that this water supply is inadequate. DFD requires a fire flow of 1,200 gallons per minute (gpm) for life safety rescue and unit cooling. At 1,200 gpm, the proposed 24,000 gallon tank will be completely depleted in just 20 minutes. Given DFD's limited tender capacity in our rural area, denied staffing requests, and the fact that standard industry response requires continuous cooling over many hours or days to prevent fire propagation, the local fire response resources are dangerously underfunded and undersized.

Given these unresolved risks, public safety must take priority over developer convenience or project timing. Until a full, independent, and scientifically verifiable worst case air plume analysis is completed, one that reflects multi unit burn durations, realistic wind conditions, adequate staffing and funding for local responders, and proper water supply standards, the project cannot be considered safe. I respectfully request that the Commission reject the current risk assessment and require a complete reevaluation that includes a cascading failure scenario before any approval is considered.

Thank you,

Alex Carpineta, Solano County