

DOCKETED

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Incomplete Analysis

Additional submitted attachment is included below.

First, I take offense in the living, breathing citizen being reduced and referred to as Receptors, we are humans deserving of respect, not Receptors. Additionally, the second scenario listed was Off gassing with no fire. The fact is there will be Off Gassing in both scenarios with or without fire. The plum AELG modeling is inadequate as it considers a 5 year average of meteorological data. Was your data compiled with the Deflagration Panels Open or closed as when open the Off Gassing will be greatly increase as they are there to rapidly relieve the internal pressure within the BESS Units to reduce potential explosions. It does not analyze data during the worst-case scenarios when winds are high or low and out of different directions such as the North with gust exceeding 50 MPH and sometime Zero with are not uncommon in the proposed area. It is also based on a 1 hour modeling and not the long term cumulative effects. When in modern history has a lithium fire only lasted one hour—the burn for days to weeks. Please redo your analysis and provide the results to include plum modeling not of averages but worst case and from various wind directions. I think you will find the result do not match your current findings of Minimal to No effect, unless of course you adjust your threshold stands to meet your objective. I look forward to seeing the results.

1. Engineering Controls --Flammable Gas and Smoke Detectors—That is nice but by the time they trigger it will be too late as a meltdown and fire will be active by the time a response team is on scene. How does this really help? NFPA 69 Roof Exhaust Ventilation System---This will help place increased toxins into the surrounding air—How does this help?
2. Administrative Controls—Ship BESS units with minimum charge – I guess this is good but I have never heard of a BESS unit fires while in-transit only when in operation. Why is this necessary if this is safe technology---I would like an answer to this question. Emergency Response Plans—Your answer—None exist—they will be developed once the BESS is in operation—That is not a satisfactory answer. You need to develop and publish a plan that is coordinated and signed off by all local fire agencies that will or could be called on to support a fire including required safety equipment PPE as well as Thermal Imaging Camera Systems and on-site or near-site explosion proof command and control facilities and who will provide these at no cost to the taxpayers or local fire agencies. In your report you indicated that the Dixon Fire District was onboard with this project—The Chief of the Dixon Fire District gave a compelling report that contradicts your assessment and clearly voiced opposition to this project. Please Explain your Confusion or Lie.