

DOCKETED

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CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov



DATE: February 07, 2019
TO: Interested Parties
FROM: John Heiser, Project Manager

**SUBJECT: Russell City Energy Center (01-AFC-07C)
Staff Response to Russell City Energy Company, LLC's Comments on
Staff Analysis of Petition to Amend**

RESPONSE TO COMMENTS

On February 4, 2019, the petitioner docketed comments (TN 226455) on staff's analysis (TN 226354, January 23, 2019) of the Petition to Amend (PTA). The petitioner suggests that the portion of staff's proposed Condition of Certification **WORKER SAFETY-3** that calls for explicit collaboration with the Hayward City Fire Department (HCFD) in modifying the fire department's standard operating procedures is unnecessary and best done by a non-prescribed, but already existing basis with the fire department. Staff confirmed that there are already ongoing fire protection related visits and communications between Russell City Energy Center (RCEC) and the HCFD, and that the fire protection plans would be required to be provided to the HCFD for review and comment. As the local fire safety and response agency, HCFD already has the jurisdiction to visit, inspect, and train at the facility as they determine the need. Therefore, staff concurs with the proposed change.

This change is acceptable because staff has already conducted its own evaluation of the safety of lithium-ion batteries and concluded that lithium-ion batteries would pose a potential fire hazard that was in addition to the existing hazards already on site. The principal hazard associated with lithium ion batteries would be fire, which could occur if a battery casing was opened, punctured or crushed. The fire could also be caused if the battery cell is short-circuited or overheated. If a fire ensues after such an event, it may burn rapidly with flare-burning effect and may ignite other batteries in close proximity. The fire can produce corrosive and/or toxic gases including hydrogen chloride, hydrogen fluoride, and carbon monoxide, similar to a fire involving a like amount of plastics or foam-padded furniture.

As lithium-ion Battery Energy Storage Systems (BESS) have become commonly installed over the recent few years, consensus-based codes and standards covering fire safety requirements for their safe installation and operation have been adopted into the latest edition of the California Fire Code. Training courses for first responders to potential BESS fires are now widely available. Staff determines that reliance upon

compliance with applicable codes and review of fire protection measures by the local fire department, as was required in the original siting decision, would be adequate to ensure that there would be no significant impact due to the addition of the BESS to the RCEC facility.

Therefore, staff recommends adoption of Condition of Certification **WORKER SAFETY-3**, with modifications. The condition would still require that the petitioner formally notify the HCFD of the addition of a BESS. The condition would still require that the fire system be approved by the Compliance Project Manager.

PROPOSED CHANGES OR MODIFICATION TO CONDITIONS OF CERTIFICATION

Staff accepts the recommended edits from the petitioner. Therefore, staff recommends that the condition of certification that staff has proposed for adoption in their January 23, 2019 staff analysis (TN 226354) should be modified as follows: ~~Strike through~~ shows text to be deleted.

WORKER SAFETY-3. The project owner shall submit the fire protection drawings and specifications for the Battery Energy Storage System (BESS) to the Hayward City Fire Department for review and comment, to the Delegate Chief Building Official (DCBO) for plan check and inspection, and to the CPM for review and approval. ~~The project owner shall also collaborate with the Hayward City Fire Department to assist in any needed modifications of their standard operating procedures for first responders to implement when confronting a fire occurring within the BESS located on site.~~

Verification:

(1) At least sixty (60) days prior to the start of construction of the BESS project, the project owner shall:

(a) Provide the complete set of BESS fire protection drawings and specifications to the Hayward City Fire Department for review and comment, and to the DCBO for plan check approval and construction inspection, and to the CPM for review and approval, and;

~~(b) Provide a copy of a letter from the project owner to the Hayward City Fire Department offering collaboration and assistance with standard operating procedures for first responders to any fires that might occur within the BESS.~~