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BLYTHE SOLAR POWER PROJECT
OPERATIONS FIRE PREVENTION PLAN

CEC Condition of Certification WORKER SAFETY-2

Prepared by:

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For Submittal to the:

California Energy Commission
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Bureau of Land Management
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Palm Springs, California

Riverside County Fire Department
210 W. San Jacinto Avenue
Perris, California

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LIST OF ACRONYMS AND ABBREVIATIONS

AED	Automated External Defibrillator
BLM	Bureau of Land Management
CALFIRE	California Department of Forestry and Fire Protection
CBC	California Building Code (2011)
CFC	California Fire Code (2011)
CFR	Code of Federal Regulations
CO2	Carbon dioxide
FAHJ	Fire Authority Having Jurisdiction
FR	Federal Register
FSP	Fire Safety Plan
IC	Incident Command or Incident Commander
MW	Megawatts
NFPA	National Fire Protection Association
NWS	National Weather Service
O&M	Operations and Maintenance
OSHA	Occupational Safety and Health Administration
Project	Blythe Solar Power Project
RCFD	Riverside County Fire Department
RFW	Red Flag Warning
SSO	Site Safety Officer
TBD	To be determined
U.L.	Underwriter's Laboratory
WUI	Wildland Urban Interface

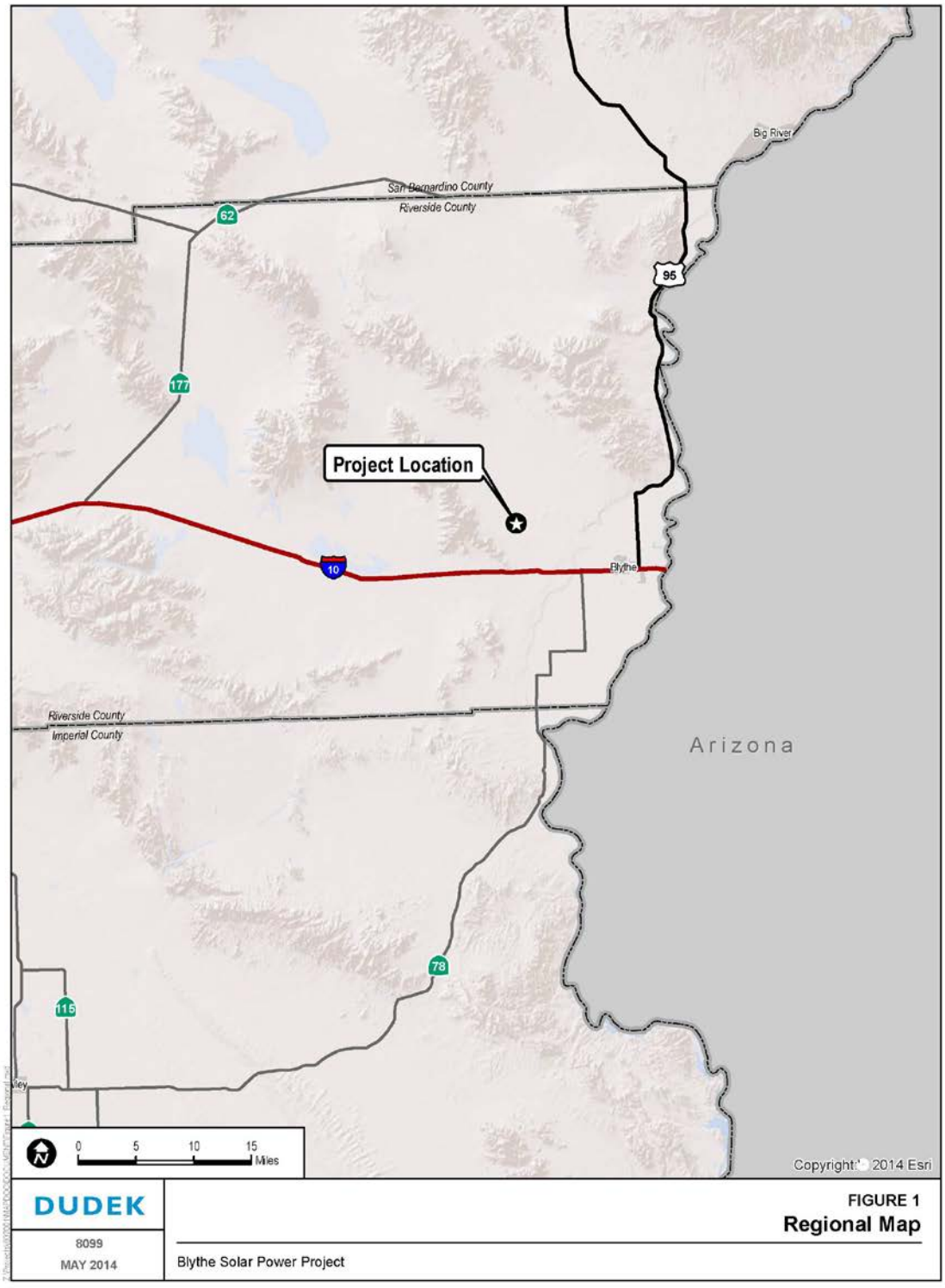
1 INTRODUCTION

The following Operations Fire Prevention Plan (FPP) has been prepared for the Blythe Solar Power Project (BSPP, or Project), located in Blythe, California (see Figure 1) in accordance with WORKER SAFETY-2, which is a requirement in the California Energy Commission (CEC) Conditions of Certification (COC) for the Project, and is required in in the Bureau of Land Management (BLM) Record of Decision (ROD) mitigation measures for the Project. WORKER SAFETY-2 includes the following requirements:

> "The project owner shall submit to the CPM a copy of the Project Operations and Maintenance Safety and Health Program containing the following:
>
> - An Operation Injury and Illness Prevention Plan;
> - An Operation heat stress protection plan that implements and expands on existing Cal OSHA regulations (8 CCR 3395);
> - A Best Management Practices (BMP) for the storage and application of herbicides;
> - An Emergency Action Plan that includes safety measures, engineering controls, and BMPs to address potential electrical shock hazards in the event of fire;
> - Hazardous Materials Management Program;
> - Fire Prevention Plan;
> - An Operations Flood Safety Plan; and
> - Personal Protective Equipment Program (8 Cal Code Regs, §§ 3401-3411).
>
> The Operation Injury and Illness Prevention Plan, Emergency Action Plan, Heat Stress Protection Plan, BMP for Herbicides, and Personal Protective Equipment, an Operations Flood Safety Plan, and Personal Protective Equipment Program shall be submitted to the CPM for review and comment concerning compliance of the programs with all applicable safety orders. The Fire Prevention Plan and the Emergency Action Plan shall also be submitted to the Riverside County Fire Department for review and comment."

This Operations FPP augments the facility's Emergency Action Plan and focuses on fire safety and prevention during the Project's operations phase. The activities anticipated during operations include potential ignition sources and fire hazards normally encountered during project operations. Because the Project is located within a remote area surrounded by native vegetation,

there is the potential for fire ignition and escape. This Operations FPP is intended to assist the project owner with identification of fire risk and implementation of important fire prevention measures. This Operations FPP is also intended to provide a training guide as well as a quick reference for all site staff for recognizing fire hazards, reporting them, and managing them during operation/maintenance and decommissioning.


Big River
San Bernardino County
Riverside County
62
95
177
Project Location
10
Blythe
Riverside County
Imperial County
Arizona
78
115
0 5 10 15 Miles
Copyright © 2014 Esri
DUDEK
8099
MAY 2014
FIGURE 1
Regional Map
Blythe Solar Power Project

2 EMERGENCY NOTIFICATION PROCEDURES

Any fire event at or near the site will trigger the emergency notification procedures identified in this section. Fire reporting is critical for tracking where, when, how, and why fire ignitions occur and will help the fire agencies develop protocols for reducing their occurrence.

2.1 First Call = 9-1-1

Reporting Fires and other emergencies: **The first call should be to 9-1-1 so that appropriate apparatus can be dispatched.** Travel times to the site require notification of 911 as early as possible after the fire or other emergency has been observed.

The personnel in Table 1 are the primary site contacts to be notified during a fire emergency:

Table 1
Emergency Notification Primary Contacts

Name	Position	Telephone Number
Gil Makabenta	Site Manager & Site Safety Officer	760.922.7820
Chris Allen	Regional Plant General Manager	207.756.0396
Eric Veerkamp	Compliance Project Manager	916.661.8458

Agency **Non-Emergency**/ Business Numbers are as follows:

- Riverside County Fire (Business Only) — Fire Marshal/Operations –760.863.8886; Local Station –760.921.7822 /Alternate – 760.921.7825
- Ambulance — Blythe Ambulance – 760.922.8460
- BLM Fire — Fed Interagency Com Center – 909.383.5652
- Riverside County Sheriff — Blythe Office – 760.921.7900
- California Highway Patrol — Blythe Office – 760.922.6141
- Hospital — Blythe Hospital – 760.922.4115

To facilitate the arrival of fire services during operations, an emergency response meeting point will be established with the Riverside County Fire Department. The Site Safety Officer (SSO), or designee will meet the emergency response team at the meeting point to lead them into the site, as possible. The meeting point will be selected with fire agency input.

2.2 Evacuation Procedures

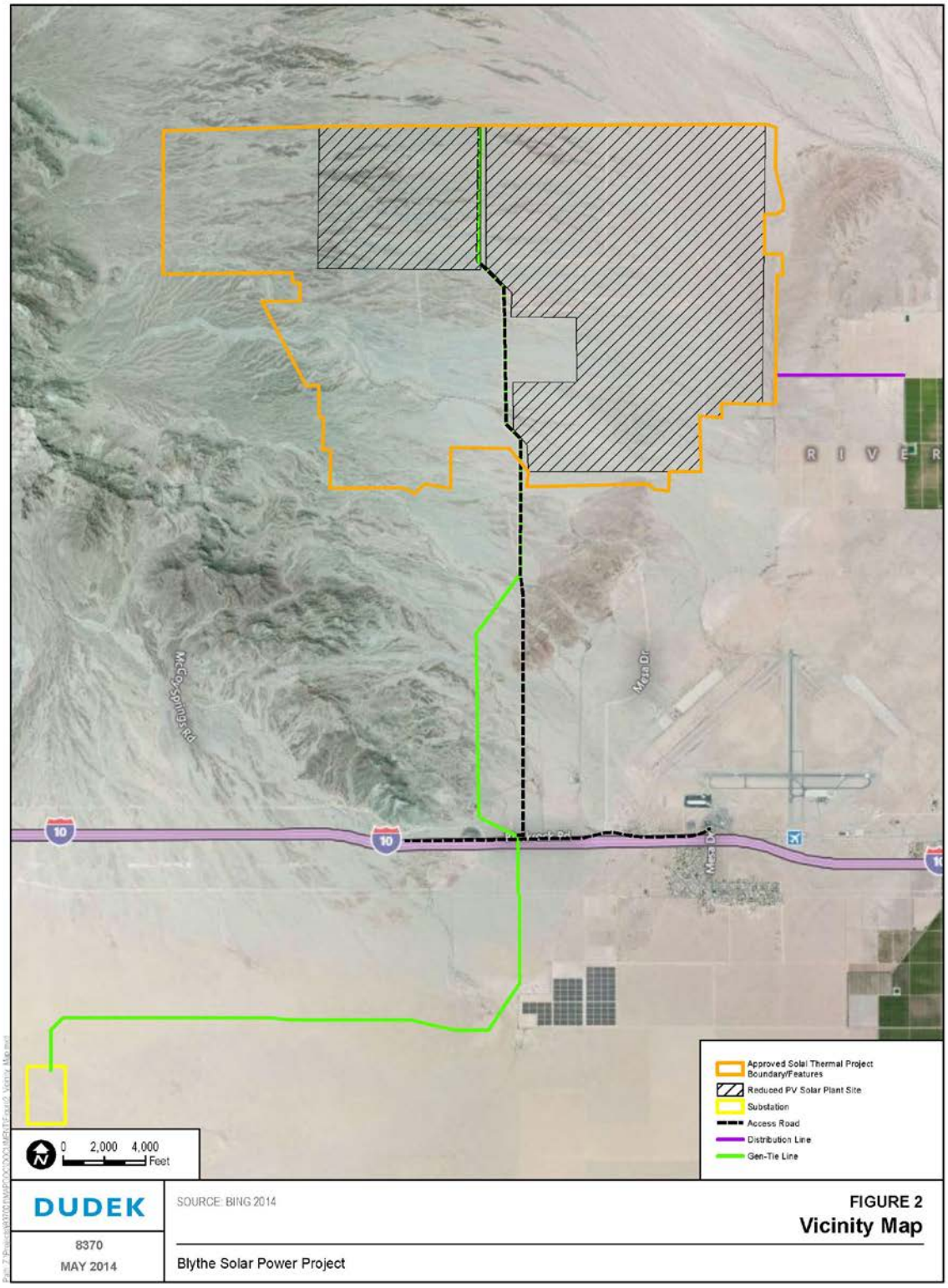
During significant emergency situations, at or near the Project site, the site manager and/or SSO, in consultation with law or fire authorities, as possible, may issue an evacuation notice. When an evacuation has been called, all site employees will gather at the designated assembly area (the primary laydown area) and the SSO will account for all personnel. Once all employees are accounted for, the vehicles will safely convoy from the site to safe zones, which are generally areas off-site away from the threat. Should there still be persons within the site after the evacuation has been called, the SSO will send convened personnel off site to safe zones and the SSO and supervisors will perform a sweep of the facility to locate persons and reconvene at the assembly area. Once all personnel are accounted for, they will exit the site.

Should a structure or wild land fire (or other emergency) occur that threatens the primary assembly area; other locations may be designated as secondary assembly areas by the SSO or supervisors, as dictated by the situation. The SSO and/or Site Supervisors should be prepared to be available to the Incident Commander throughout the Incident to facilitate information exchange.

2.2.1 Evacuation Routes

Depending on the type and severity of the emergency, along with weather and/or localized site conditions, roadways designated on Figure 2 will be used for evacuating the area. The primary site access and evacuation route is Black Rock Road. If a wildfire encroaches or threatens the primary evacuation route, the alternative route is the dedicated secondary access road: Midland Road via 6th Avenue.

The SSO and site managers are primarily responsible for evacuations. They will employ procedures to determine the emergency, talk with fire officials, as possible, and declare the emergency status. These site experts should be prepared to relay important information regarding the site and its functions and potential dangers to responding firefighters. Foreman level supervisors shall assist in accounting for personnel. The SSO or his/her designee, shall be assigned to meet and guide firefighting resources to the scene.


McCoy Springs Rd
Mesa Dr
10
Approved Solal Thermal Project Boundary/Features
Reduced PV Solar Plant Site
Substation
Access Road
Distribution Line
Gen-Tie Line
0 2,000 4,000 Feet
DUDEK
SOURCE: BING 2014
FIGURE 2
Vicinity Map
8370
MAY 2014
Blythe Solar Power Project

3 BSPP Roles and Responsibilities

All employees should know how to prevent and respond to fires, and are responsible for adhering to company policy regarding fire emergencies. In particular, the following sections detail general responsibilities, by position.

3.1 Project Owner/Management

In accordance with CEC conditions and BLM design features, the Project Owner has prepared a project-specific fire risk assessment and Operations FPP for review and approval. The project Owner/Management have also agreed to implement necessary measures to reduce the risk and comply with federal, state, and local fire safety/protection policies. Additionally, Project Owners/Management are responsible for making necessary training and equipment available to provide a safe working environment for employees and contractors.

3.2 Site Safety Officer

The SSO will manage the Operations FPP for the Project and will maintain all records pertaining to the plan. Among the other responsibilities of the SSO are:

- Understanding the FPP and its mandates for training, fire prevention, incipient fire suppression, and evacuation.
- Understanding the fire risk associated with the site and with activities that will occur on site.
- Developing and administering the fire prevention and safety training program.
- Ensuring that fire control equipment and systems are properly maintained and in good working condition.
- Monitoring combustibles on the site and managing where they are stored.
- Conducting fire safety surveys and making recommendations.
- Posting fire rules on the project bulletin board at the contractor's field office and areas visible to employees.
- Stopping project work activities that pose a fire hazard or are not in compliance with this FPP
- Reporting all fires ignited on the site, whether structural, vegetation, electrical, or other to BLM FIRE and the Riverside County Fire Department.
- Relaying site component functions, potential dangers, and general electrical information to responding firefighters.
- Providing any FPP updates to the BLM, CEC and RCFD.

3.3 Supervisors

Supervisors are responsible for:

- Ensuring that employees receive appropriate fire safety training
- Notifying the SSO when changes in operation increase the risk of fire
- Enforcing fire prevention and protection policies
- Accounting for employees/contractors in the case of an evacuation
- Performing site sweeps to round up staff
- Facilitating fire agency access to the site
- Cooperating with the fire agencies/Incident Command during and following fires
- Identifying unsafe work practices that may lead to fire ignitions

3.4 Employees/Contractors

All employees and contractors shall:

- Complete all required training before working on site without supervision
- Conduct operations safely to limit the risk of fire
- Report potential fire hazards to their supervisors
- Follow fire emergency procedures
- Understand the emergency evacuation protocols

4 FIRE SAFETY PLAN GOALS

The primary goals of this FPP are to address the identified ignition sources and risks so that the Project operations phase has clearly defined protocols and procedures for reducing fire risk and maintaining a fire safe worksite. Among the goals developed for the Project site are:

- Prevent/minimize fires during operations and decommissioning
- Provide a safe work-site for all employees, contractors, visitors and emergency personnel
- Prevent shock to emergency responders, workers, and unauthorized trespassers
- Prevent arcing or sparking, which could ignite vegetation on site
- Employ materials which will not be readily ignited by airborne burning embers or exposure to off-site wildland fires or on-site equipment fires
- Employ materials which will not emit toxic fumes during a fire and spread off site
- Prevent or minimize dollar loss to the equipment
- Prevent or minimize potential for a fire starting on site to spread off site
- Provide water, appropriate fire extinguishers and access for firefighters
- Provide adequate signage and shut off devices to stop power feed into power lines in the event of a line failure, or fire in right of way
- Provide the ability to report a fire or other emergency to emergency dispatch center without delay and to make contact with internet websites and company personnel

5 BSPP SOLAR PROJECT FIRE SAFETY STANDARDS

The Fire Safety Standards listed below will be presented during the Worker Environmental Awareness Training Program for Operations:

1. **Equipment Specifications:** Solar facility components will be periodically inspected, provided on-going maintenance, and maintained in good operating condition, according to manufacturer recommendations.
2. Equipment will be inspected to ensure internal combustion engines are equipped with spark arrestors and maintained in good working order. In addition, mufflers on all cars and light trucks will be maintained in good working order.
3. **Roads:** Light trucks and cars will be used only on roads where the roadway is cleared of vegetation. Roads are to be kept free of ruts, drainages, washboarding, and all areas maintained in a hard compacted state able to support fire trucks
4. **Staging Vehicles, Equipment, and Small Stationary Engines:** Vehicles, equipment and small stationary engine sites will be parked in areas that are cleared of flammable material to the greatest extent feasible.
5. **Vegetation Clearing/Management:** Contractors on site will be directed to restrict use of chainsaws, chippers, vegetation masticators, grinders, drill rigs, tractors, torches, and explosives to outside of the official fire season to the greatest extent feasible. When the above tools are used, water tanks equipped with hoses, fire rakes, and axes shall easily accessible to personnel. Vegetation near all solar panel arrays, ancillary equipment, and access roads will be controlled through implementing weed management practices.
6. **Smoking:** Smoking will occur in designated smoking areas that are not located within 50 feet of combustible materials storage or wildland areas, and on paved areas or areas cleared of all vegetation.
7. **Project Fire Rules:** The SSO will post fire rules contained in the Operations FPP at the O&M facility in a location visible to employees.
8. **Fire Safety and Emergency Response Training:** All personnel will be trained on the emergency response procedures detailed in the Blythe Solar Emergency Plan prior to being allowed to work at the project site. Training will cover the proper use of fire-fighting equipment to be followed in the event that a non-electrical fire is discovered onsite. All personnel will be trained not to attempt to extinguish an electrical fire of any size and instead to immediately call 9-1-1.

9. **Remote Monitoring:** Remote monitoring of all major electrical features has been incorporated into the facility design. Fire detection will include trained personnel (all site personnel will provide eyes and ears for fire detection), a SSO will implement appropriate fire monitoring and lookouts during fire weather and when hot work activities are conducted. Fire monitoring will occur for up to one hour following completion of the hot works.
10. **Technical Staff Contact:** Project contact information will be provided to local fire agencies/stations to assist responding firefighters during an emergency.
11. **Fire Extinguishers:** Fire extinguishers shall be affixed to permanent structures where fire has the potential to occur, such as buildings and inverters. Project vehicles will be required to carry standard five-pound dry chemical fire extinguishers/5BC. Additional requirements for fire extinguishers, including types, ratings and distances from applicable materials (i.e., hazardous materials storage) or activities (i.e., hot work) are included in Sections 6 and 7 of this Plan, respectively.
12. **Ignition-Resistant Buildings and Fire Protection Systems:** On-site structures such as inverter structures, water tanks, and substation control rooms will be of non-combustible construction or will comply with the ignition-resistive construction requirements: Wildland-Urban Interface (WUI) areas of Chapter 7A of the California Building Code (CBC).

    In addition, ignition resistance solar panel components are recommended, and include:

    a. Wiring, harnesses and junction boxes designed so as to not ignite and arc or spark thereby causing potential ignition source for vegetation
    b. Electrical wiring to be listed for outdoors/exterior and be fire retardant
    c. Insulation materials (sealants) on panels to be noncombustible
    d. Electrical motors to be of a type that is sealed and does not emit sparks
    e. Provide Arc-Flash protection
    f. Exposed electrical wiring to be in proper weather resistant conduit to help resist fire exposure, arcing and sparking, etc.
    g. Waterproof electrical enclosures
    h. No plastic components or cases on panels.
13. **Water:** Typical water usage will include panel washing, dust suppression (soil binding agent road applications), and personnel usage. On-site water tanks shall comply with NFPA 22, Private Fire Protection Water Tanks. The water capacity of each tank is a minimum of 15,000 gallons.

6 STORAGE OF FLAMMABLE AND COMBUSTIBLE LIQUIDS AND FUELING

Storage, use, handling, and dispensing of flammable and combustible liquids shall comply with the applicable sections 3404, 3405, and 3406 of CFC Chapter 34. The Maximum Allowable Quantities (MAQ) of flammable and combustible materials shall not exceed those in CFC Chapter 34. Flammable and combustible liquids and the fueling of vehicles and equipment shall only be done in the approved fueling areas. Approved, UL-listed containers or tanks, which comply with CFC Chapter 34, will be provided for storage and dispensing. Tanks and containers shall be labeled as required in CFC Chapter 34. Dispensing shall be done in an approved manner per CFC Chapter 34 using approved devices and hoses with approved shut offs, such approvals are Underwriters Laboratories (UL) or Factory Mutual Global (FM Global), or fire agency equivalent. Approved Fire Extinguishers with a rating of not less than 3-A-40 BC shall be provided within 50 feet of the storage/refueling area. Approved grounding and bonding will be provided for dispensing of flammable liquids. The storage and dispensing area shall have spill control and secondary containment to contain the contents of the largest container. No combustibles shall be stored in the same location as flammable or combustible liquids. All containers shall be labeled as to contents. Safety instructions and No Smoking signs shall be posted. No open flames are allowed. Vehicle or equipment motors shall be shut off prior to fueling. Any fueling of vehicles using CNG or other gases shall comply with the CFC. Gasoline shall not be stored, used, or dispensed, unless required for small equipment.

Mobile fuel or lube oil trucks shall comply with the following:

- Be in good repair and comply with the spark arrestor rules;
- Have appropriate warning signs and decals;
- Use proper bonding and grounding equipment;
- Shut off all internal combustion engines prior to refueling;
- Allow engines to cool down sufficiently as to not ignite spilled fuel;
- Be equipped with a fire extinguisher with a 10-A-120 BC rating (or equivalent);
- Have one 46” round point shovel;
- Provide one 10-A-120 BC rated fire extinguisher;
- Contain a metal can with lid for storage of rags;
- Have a suitable spill kit on truck;
- Be equipped with contractor radio and have Cell Phone;

- Equipment operators should stay in immediate area but stay off vehicle during refueling;
- Be trained in procedure for reporting emergencies;
  - No dispensing (dispensing includes re fueling) within 25 feet of any open flame or ignition source;
  - No dispensing within 15 feet of buildings, property lines, or combustible storage, per CFC 3406.5.4.5;
- No smoking within 25 feet of dispensing – no smoking at all on Red Flag Warning days

7 HOT WORK

These requirements are primarily from California Fire Code (CFC) Chapter 26, "Welding and other Hot Work," and NFPA 51-B, "Fire Prevention During Welding, Cutting and other Hot Work". Hot Work is defined in the CFC as operations involving cutting, welding, thermit welding, brazing, soldering, grinding, thermal spraying, thawing pipe, or other similar operations. Hot Work areas are defined as the areas exposed to sparks, hot slag, radiant heat, or convective heat because of the Hot Work.

A Hot Work Permit shall be obtained from the on-site safety officer, following guidelines from the Fire Agencies, for all Hot Work regardless of location. The SSO will require all Hot Work to be done per requirements in NFPA 51-B and the Fire Code Chapter 26.

Hot Work shall only be done in fire safe areas designated by the SSO and shall comply with the following:

- All personnel involved in Hot Work shall be trained in safe operation of the equipment by the SSO. This will include providing training at "tailgate safety meetings". They shall also be made aware of the risks involved and emergency procedures, such as how to transmit an alarm and who is responsible to call 911.
- Signage required in areas where workers may enter indicating "Caution; Hot Work in progress; Stay Clear."
- Hot Work shall not be done on any containers which contain or have contained flammable liquids, gases or solids until containers have been thoroughly cleaned, purged, or inerted.
- A fire extinguisher with a minimum rating of 3-A-40 BC, a 5-gallon backpack pump fire extinguisher, and a 46-inch round point shovel, shall be readily accessible within 25 feet of Hot Work area.
- The safety manager shall inspect the Hot Work area before issuing a permit and shall then make daily inspections.
- Gas Welding and cutting shall comply with 2010 California Fire Code (CFC) Section 2605.
- Electric arc hot work shall comply with CFC 2606.
- Piping manifolds and Hose Systems for Fuel Gases and Oxygen shall comply with CFC Section 2609.
- Cylinder use and storage shall comply with CFC Chapter 30, "Compressed Gases."

- All equipment shall be approved by a Fire Agency, including torches, manifolds, regulators, or pressure reducing valves, and any acetylene generators.
- Personal Protective Clothing (PPE) shall be selected to minimize the potential for ignition, burning, trapping hot sparks, and electric shock.
- As considered necessary by the SSO, post work fire monitoring may be required for up to one hour.
- Any ignitions will be immediately extinguished (as possible following the emergency response procedures detailed in the Blythe Solar Emergency Plan) by site personnel and the fire department will be notified of the incident.

The SSO shall have the responsibility to assure safe Hot Work operations, and shall have the authority to modify Hot Work activities associated with maintenance activities, and to exceed the requirements in NFPA 51-B and the Fire Code, to the degree necessary to prevent fire ignition. Workers must be trained on the Hot Work Information and Criteria in this plan.

8 SITE AND PROJECT DESCRIPTION

8.1 Location

The Project is located 9 miles northwest of Blythe, California (see Figure 1). The Project includes roughly 4,070 acres including a primary solar facility along with linear features including a main access road and a generation tie-in (gen-tie) transmission line (see Figure 2).

8.2 Vegetation

The site is situated within the Southern California Sonoran Desert region and is surrounded by vegetation dominated by Sonoran creosote bush scrub. Monsoon rains differentiate this area from most of the California deserts. These rains may result in establishment of non-native grasses and other invasive species which facilitate fire ignition and spread. The normally sparse and disconnected (shrubs separated by non-vegetated space) fuel load of the creosote scrub can become continuous as invasive plants, primarily non-native grasses dry. Dry fuels are susceptible to ignition from sparks and heat sources that may occur as part of the normal operations of the site.

8.3 Project

The Project includes the solar plant site, support facilities, access road/utility corridor, and a gen-tie transmission line. The components which are within the fenced Project site include the solar arrays, substation, access road, water storage tanks, and auxiliary systems. Project components that are outside the fenced plant include the main access road, gen-tie line, telecommunications lines, and a feeder distribution line. The project has been issued a right-of-way by the BLM for a term of 30 years and during the operations phase, is anticipated to employ 13-20 workers. Decommissioning would be anticipated to involve similar activities and worker populations as operations.

9 PROJECT SPECIFIC RISK SUMMARY

9.1 Fire Risk

Fire risks must be assessed based upon the potential frequency (probability of an incident occurring) and consequence (potential damage should an event occur). The evaluation of fire risks must take into account the frequency and severity of fires and other significant incidents.

The Study Area includes common risk types as well as heightened sources of risk. Common risks that result in emergency calls include accidental injuries (residential, vehicle, other), medical related incidents including heart attacks, strokes and other serious conditions and illnesses, accidental vegetation fires, and occasional structure fires. The study area also includes a major transportation corridor risk category that has a higher occurrence rate than commonly realized in other areas. Vehicle related incidents along the I-10 freeway, are likely to occur at higher levels in the Project area than in areas without a major freeway Roadside fires are also a significant risk with spread into the adjacent wildlands probable.

Among the listed potential causes of fire incidents involving Solar Panels and Solar Farms that are relevant for this study are:

- Explosion/Arcs, arc flashing, electrical shorts, sparking, motor or other machinery fire, wiring and harnessing fire, overheated junction boxes, rodents chewing on wires and causing arcing, etc.
- Collapse of supporting structure causing electrical shorts and fire
- Overgrown vegetative fuel under and around the array
- Equipment and supplies stored under arrays for shading
- Tables, trash cans, smoking areas and other combustible storage under arrays
- Fire in an inverter
- Short circuit and fire of components in or on a panel
- Potential for sun reflection from panels igniting vegetation
- Illegal target practice or other vandalism or arson in a rural area
- Lubricating and control oil fire
- Switchgear and cable fire

The Project's fire risks during the Operations and Maintenance and Decommissioning Phase are associated with the following:

9.1.1 Operation and Maintenance Phase Risks

Ignition risks are anticipated to drop considerably following the Project's active construction phase. Operation and maintenance activities occur within a defined project footprint where the adjacent fuels have been removed or converted to fuel modification-consistent vegetation.

- Transformers – are subject to occasional failure, sending sparks, hot materials out in any direction; fire in a transformer may result in ignition of the oil therein
- Capacitors – may overheat, fail, and cause a spark, which may result in combustion of flammable materials, such as vegetation, if nearby
- Electrical transmission lines – energized lines may arch from adjacent vegetation (trees) or if tower/pole fails, may arch on the ground, causing ignition of vegetation
- Substations – include various electrical components that may explode, fail, or ignite and include oil-cooled transformers
- Vehicles – heated exhausts in contact with vegetation may result in ignition
- Hot Works Equipment – all small hand tools either gas or electric powered that may result in sparks, flames, or excessive heat may result in vegetation ignition.

9.1.2 Decommissioning Phase Risks

- Earth-moving equipment – create sparks, heat sources, fuel or hydraulic leaks, etc.
- Chainsaws – may result in vegetation ignition from overheating, spark, fuel leak, etc.
- Vehicles – heated exhausts/catalytic converters in contact with vegetation may result in ignition
- Welders – open heat source may result in metallic spark coming into contact with vegetation
- Compost piles – large piles that are allowed to dry and are left on-site for extended periods may result in combustion and potential for embers landing in adjacent vegetation
- Grinders – sparks from grinding metal components may land on a receptive fuel bed
- Torches – heat source, open flame, and resulting heated metal shards may come in contact with vegetation
- Dynamite/blasting – if necessary, blasting may cause vegetation ignition from open flame, excessive heat or contact of heated material on dry vegetation

- Other human-caused accidental ignitions – ignitions related to discarded cigarettes, matches, temporary electrical connections, inappropriately placed generators, poor maintenance of equipment, and others.

9.1.3 Power Line Risks

Electrical transmission and collection lines such as those proposed for this project and associated structures can start fires in a number of ways, including the following:

- Uncleared vegetation, especially trees, coming into contact with conductors
- Sparks (from exploding hardware such as transformers and capacitors) coming into contact with vegetation
- Wind-blown debris coming into contact with hardware such as transformers and conductors
- Conductor-to-conductor contact
- Dust or dirt buildup on power line hardware
- Aircraft or helicopter, or attached features such as fire-fighting water buckets, coming into contact with power line hardware and support structures
- Wildlife coming into contact with power line hardware or transmission line
- Vandals shooting or throwing rocks at panels

10 REVIEW AND APPROVAL

The signatory reviewing officials are acknowledging that Blythe Solar LLC has established a Fire Safety Plan that meets the intentions of the Environmental Impact Report mitigation measure requirements and when properly implemented, maintained, and enforced, results in fire hazard and risk reduction for the BSPP operation/maintenance and decommissioning phases. Reviewing agencies do not accept any responsibility for Blythe Solar LLC's interpretation or implementation of this plan prior to, during or following operation and maintenance and decommissioning of the BSPP project or for any resulting actions associated with these activities.

Approved by:

_____	_____
Blythe Solar LLC Site Safety Officer	Date

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