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Document Title:	Hazardous Materials Business Plan
Description:	This plan describes the anticipated hazardous materials, employee training, and emergency response for the project.
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Organization:	Allen Matkins Leck Gamble Mallory & Nats
Submitter Role:	Applicant Representative
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Appendix 1F

Hazardous Materials Business Plan

Hazardous Materials Business Plan

Potentia-Viridi Battery Energy Storage Project Alameda County, California

JULY 2024

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
APSA	Aboveground Petroleum Storage Act
CERS	California Environmental Reporting System, which is a State of California electronic database used to submit site information regarding environmental plans.
CWA	Clean Water Act
CUPA	Certified Unified Program Agency, the agency having local oversight for SPCC Plans in California
FCR	Federal Code of Regulations. SPCC Plans are covered under FCR Title 40, Part 112
HMBP	Hazardous Materials Business Plan
SPCC	Spill Prevention Control and Countermeasure Plan
UPA	Unified Plan Agency

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1 Introduction

Levy Alameda, LLC (Applicant), a wholly owned subsidiary of Obra Maestra Renewables, LLC, proposes to construct, operate, and eventually repower or decommission the 400-megawatt (MW) Potentia-Viridi Battery Energy Storage System (Project) on approximately 85 acres in eastern Alameda County. The primary components of the Project include an up to 3,200 megawatt-hour (MWh) battery energy storage system (BESS) facility, an operations and maintenance (O&M) building, a project substation, a 500 kilovolt (kV) overhead intertie transmission (gen-tie) line, and interconnection facilities within the Pacific Gas and Electric (PG&E) owned and operated Tesla Substation (Figures 1 and 2).

This Hazardous Material Business Plan (HMBP) "Plan" has been written as part of the project development documents for the County to describe anticipated hazardous materials, employee training and emergency response for the Project. HMBP's are "living documents" in that the documents will change based on changing activities and personnel at the project site. This originally submitted documentation will need to be reviewed and any changes will need to be updated just prior to construction, during the operating life of the Project and during decommissioning.

1.1 Elements of a Hazardous Materials Business Plan

The California Safety Code Division 20. Miscellaneous Health and Safety Provisions Chapter 6.95 §25505 establishes requirements for Hazardous Materials Business Plans (HMBPs) in the State of California. A Hazardous Materials Business Plan (HMBP) must contain the following:

- An inventory of hazardous materials onsite,
- An Emergency Response Plan including procedures and contacts for communicating an immediate response to a reportable release or threatened release of a hazardous material,
- Employee training in project safety procedures and emergency response plans and procedures in the event of a reportable release or threatened release.

1.2 Certified Unified Program Agency (CUPA)

The California Unified Program was established by the passing of California Senate Bill 1082 in 1994 to consolidate six related environmental programs into one oversight authority for the purposes of streamlining local oversight, administrative requirements, permits and emergency response. The Unified Program requires the California Environmental Protection Agency (CalEPA) to certify qualified local governments known as Certified Unified Program Agencies (CUPAs) as able to implement the programs, including HMBPs. Therefore, at a local level, it is the CUPA that oversees California HMBP plan applicability, review, inspections, and implementation. A CUPA can be a county, a city or a joint powers authority.

The six programs that have been consolidated under the Unified Program in California include:

- Aboveground Petroleum Storage Tank Program (APSA)
- Hazardous Materials Business Plan Program (HMBP)

- California Accidental Release Prevention Program
- Hazardous Material Inventory Statement and Hazardous Materials Management Plan
- Hazardous Waste Generator-Tiered Permitting
- Underground Storage Tank Program

1.3 Is a HMBP Plan Applicable to this Project?

The Project is anticipated to qualify for a Hazardous Materials Business Plan, and oversight by CUPA, during construction, operations and decommissioning because it is anticipated to have materials onsite that are greater than the State of California thresholds for quantities of hazardous materials. Threshold quantities are hazardous materials at or above the reporting quantities of 55 gallons of a liquid, 500 pounds of a solid, or 200 cubic feet of a compressed gas. The project is anticipated to qualify for a HMBP based on the quantities listed in Table 1. A list of the hazardous substances which qualify for reporting is maintained in California Occupational Safety and Health Regulations Chapter 3.2 Article 5 §339. The anticipated hazardous materials anticipated at the Project are discussed in Section 3 of this Plan.

2 Project Description

Levy Alameda, LLC (Applicant), a wholly owned subsidiary of Obra Maestra Renewables, LLC, proposes to construct, operate, and eventually repower or decommission the 400-megawatt (MW) Potentia-Viridi Battery Energy Storage System (Project) on approximately 85 acres in eastern Alameda County. The primary components of the Project include an up to 3,200 megawatt-hour (MWh) battery energy storage system (BESS) facility, an operations and maintenance (O&M) building, a project substation, a 500 kilovolt (kV) overhead intertie transmission (gen-tie) line, and interconnection facilities within the Pacific Gas and Electric (PG&E) owned and operated Tesla Substation.

The Project would draw electricity from the power grid to charge and store electrical energy and discharge back to the power grid when the stored energy is needed. The Project would provide several benefits to the power grid, including reducing the need to operate natural gas power plants to balance intermittent renewable generation and serving as an additional capacity resource that would enhance grid reliability. The Project will have operational staff onsite in addition to being remotely operated and monitored year-round and be available to receive or deliver energy 24 hours a day and 365 days a year.

2.1 Project Location

The Project site is located at 17257 Patterson Pass Road, Tracy, CA 95377. The property is southwest of Interstate 580 and Interstate 205 on a portion Alameda County Assessor's Parcel Number 99B-7890-002-04. The Project area consists of approximately 70 acres. The gen-tie line would extend southeast from the Project substation, crossing Patterson Pass Rd, and then proceed east to the Tesla Substation. The Project's gen-tie line would be sited on APNs 99B-7890-2-4, 99B-7890-2-6, and 99B-7885-12. The Project site has land use and zoning designation of Agriculture. The area surrounding the Tesla Substation is sparsely developed for residential use, with the nearest residence, which is also owned by the same landowner leasing the land for the Project, is approximately 1,500 feet southeast of the Project site and 560 feet south of the proposed gen-tie line.

2.2 Project Components

Project components include the Battery Energy Storage System (BESS) Enclosures, Power Conversion Systems (PCS), Medium voltage (MV) Collection System, Project Substation, Control Building, and Telecommunications Facilities, Access Roads, Laydown Yards, Stormwater Facilities and Outfall, Site Security and Fencing, including fire detection system, and an Operations and Maintenance Building. This section provides details of each component.

- **Battery Energy Storage System (BESS).** The energy storage facility would utilize a modular and containerized BESS. The initial Project concept has been developed assuming lithium iron phosphate (LFP) cells. It is anticipated ESS enclosure height will not exceed 12 feet. The structures may also have a heating, ventilation, and air conditioning (HVAC) system for optimal performance and safety.
- **Power Conversion Systems (PCS).** The PCS would convert electric energy from AC to DC when the energy is transferred from the grid to the battery, and from DC to AC when the energy is transferred from the battery to the grid.
- **Project Substation.** A Project substation is anticipated to be constructed adjacent to the BESS facilities. The power to and from the BESS would be passed through a final interconnection step-up transformer to convert it from 34.5 kV to 500 kV high-voltage for delivery to the PG&E Tesla Substation.

- **Telecommunications Facilities.** Fiber-optic cables will be used to connect the Project site switchyard with the PG&E point of interconnection and to existing fiber-optic lines for remote monitoring. Fiber optic cable may require trenching for installation, or it may be placed on poles, or a combination of both.
- **Access Roads.** Access to the Project site would be provided via an existing private driveway to the north of the site, off of Patterson Pass Road, and a new private driveway to the southeast of the site, off of Patterson Pass Road.
- **Laydown Yards.** There would be four laydown yards onsite. The primary laydown yard would be maintained just north of the central project substation area. This yard would be used during both construction and operation of the BESS facility.
- **Site Security, Lighting, and Fencing.** The Project would be enclosed at the perimeter by a 6-foot to 8-foot-tall security fence. Lighting would only be in areas where it is required for safety, security, or operations. Security cameras will be placed on site and monitored 7 days a week and 24 hours per day.
- **Fire detection system.** Multiple fire detection systems will be installed on-site and within the individual BESS enclosures including an infrared camera system and an onboard battery management system (BMS). In the event of an anomaly, the system will shut down to mitigate the hazard. The BESS enclosures are designed and constructed in such a way that fire would not propagate from one enclosure to a neighboring enclosure in the event of a thermal runaway.
- **Operations and Maintenance Building.** An O&M building would be constructed within the primary laydown yard for the Project's anticipated three full-time operations staff.
- **Generation Tie-Line.** Electrical energy would be transmitted to and from the Project substation to the existing Tesla PG&E Substation through a proposed 500-kV gen-tie line. The gen-tie line would extend southeast from the facility to the Tesla PG&E Substation.

2.3 Battery Energy Storage System Enclosures

The energy storage facility would utilize a modular and containerized BESS. There are several battery cell technologies commercially available, with one of the most common at present being lithium iron phosphate (LFP) cells (often colloquially referred to as 'lithium-ion'). LFP technology is considered one of the safest, most efficient, and commercially financeable energy storage technologies available on the market. The initial Project concept has been developed assuming an LFP technology. By the time the Project reaches the procurement stage, it is possible for other battery cell technology with proven safety and performance records to be suitable for the Project. Although the number and dimensions of the containers may change (as it does between LFP technology providers), the technology ultimately procured would result in potential environmental impacts substantially similar to, or less than, those analyzed based on this Project Description.

The BESS enclosures would be prefabricated off-site and arrive at the site ready to be installed and commissioned. Each modular BESS enclosure would include battery packs on racks, a battery management system (BMS), fire protection, and ancillary power electronics within a specialized steel-framed, non-occupiable container. The BESS enclosures would not exceed approximately 15 feet in height. The BESS enclosures may also have a heating, ventilation, and air conditioning (HVAC) system for optimal performance and safety. Power for the HVAC system, lighting, and other electrical systems would be provided through separate auxiliary power connection to the on-site project substation with connection lines installed above and/or below ground.

2.4 Fire Protection Systems

Fire protection would include multiple fire detection systems on-site and within the individual BESS enclosures. An infrared camera system would be installed throughout the BESS facility to achieve 100% of electrical infrastructure and trigger an alarm in case of an onsite fire. Each BESS enclosure would have a fire rating in conformance with the California Fire Code 2022. In addition, each BESS enclosure would contain an onboard battery management system (BMS) that monitors the appropriate state of individual battery cells and relays information 24-7. In the event of an anomaly, the system is designed to shut down and mitigate the hazard.

The Project's fire protection design would comply with California Fire Code 2022, Section 1207 Electrical Energy Storage Systems, which adopts the National Fire Protection Association's Standard for the Installation of Stationary Energy Storage Systems (NFPA 855). BESS enclosures would be Underwriters Laboratories (UL) listed, tested, and certified to the most rigorous international safety standards. UL independently tests equipment for compliance with the latest fire safety code requirements, and the methods were developed to minimize fire risk and safety concerns about battery storage equipment raised by fire departments and building officials in the United States.

Faults, mechanical damage, or manufacturing defects in lithium-ion batteries can cause thermal runaway, which can lead to fires or other hazards. Should a thermal runaway event occur, the BESS enclosures are designed and constructed in such a way that fire would not propagate from one enclosure to a neighboring enclosure. The Project's BESS enclosures, as part of the testing and listing process, would be subjected to destructive testing including fire testing. The Project's BESS enclosures would include the following UL certifications:

- UL 1642 – Standard for Lithium Batteries (cell level certification).
- UL 1973 – Standard for Batteries for Use in Stationary Applications (module level certification).
- UL 9540 – Standard for Energy Storage Systems and Equipment (system level certification).
- UL 9540A – Test Method for Evaluating Thermal Runaway Fire Propagation in Battery Energy Storage Systems.

CAL FIRE would review and comment on the facility fire protection plans.

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3 Hazardous Materials

The hazardous materials that are anticipated to be used at the project site are safe under normal handling and operating conditions. Each individual module will be monitored and controlled to ensure safe and efficient operations, and every BESS enclosure will be equipped with ventilation, as well as gas, heat and smoke detection and alarms. The systems will be designed, constructed, and operated pursuant to the applicable California Fire Code.

The following are types of hazardous materials that may be found at the project site during construction, operation and decommissioning of the project site:

- **Temporary Fuel Tanks:** Petroleum such as Diesel No. 2 or gasoline, may be stored onsite during construction and decommissioning to fuel construction and decommissioning equipment, including onside generators, though it is not anticipated to be stored onsite during the operation of the site.
- **Battery Energy System Components:** Lithium-ion batteries commonly contain the heavy metals cobalt, copper and nickel as well as other trace heavy metals depending on the location of the source of the mined components. The exact components will not be fully known until the batteries are sourced closer to construction.

Table 1. Potential Sources of Hazardous Materials at the Project

Location	Type of Container	Volume and Oil Type	Stage
BESS – Laydown	Temporary auxiliary fuel storage for generator	1 EA at approximately 1,000-gallon Diesel No. 2	Construction/ Decommissioning
BESS – Laydown	Temporary fueling station	1 EA at approximately 500-gallon Diesel No. 2	Construction/ Decommissioning
Substation	Temporary auxiliary fuel storage for generator	1 EA at approximately 1,000-gallon Diesel No. 2	Construction/ Decommissioning
BESS	BESS Enclosures	1,000 EA lithium-ion phosphate cells.	Construction/ Operations/ Decommissioning
Substation	Main Power Transformers	3 EA at approximately 17,000-gallons of transformer oil	Construction/ Operations/ Decommissioning

Once specific properties and quantities of onsite materials are known, a hazardous materials inventory for any hazardous materials that are greater than the State of California thresholds for quantities of hazardous materials can be uploaded onto the CERS system.

Threshold quantities are hazardous materials at or above the reporting quantities of 55 gallons of a liquid, 500 pounds of a solid, or 200 cubic feet of a compressed gas. A list of reportable hazardous substances is maintained in California Occupational Safety and Health Regulations Chapter 3.2 Article 5 §339.

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4 Emergency Response Plan

The following sections describe the Project emergency response procedures, contacts and reporting for the Project.

4.1 Emergency Action Plan

The following Emergency Action Plan covers potential onsite chemical spills, fires and earthquakes involving the hazardous materials described in Section 3 above:

Notify Internal and Onsite Personnel

1. Onsite alarm system(s) will automatically alert Internal Staff and CalFire.
2. Notify facility personnel via cell phone and evacuate if necessary.
3. Proceed to a Project Muster Point (See Figure 1).

Notify Emergency Response

4. Notify local emergency responders by calling 9-1-1.
5. Onsite alarm system(s) will automatically alert Internal Staff and CalFire.

Notify Neighboring Facilities That May Be Affected by an Off-Site Release

6. Notify Neighboring Facilities that may be affected by an off-site release:
    a. Verbally.
    b. Via Cell Phone.

Notification to CUPA and State

7. (if needed) Notify the local Unified Program Agency (UPA) Alameda County Department of Environmental Health 510.567.6702.
8. (if needed) Notify the State Warning Center at 800.852.7550.

Prior to Resumption of Operations

Following notification and before facility operations are resumed in areas of the facility affected by the incident, the Emergency Coordinator shall notify the local UPA and the local fire department's hazardous materials program, if necessary that the facility is in compliance with requirements to:

- Provide for proper storage and disposal of recovered waste, contaminated soil or surface water, or any other material that results from and explosion, fire, or release at the facility; and,
- Ensure that no material that is incompatible with the released material is transferred, stored, or disposed of in areas of the facility affected by the incident until clean up procedures are completed.

4.2 Facility and Agency Contacts

Table 2. Facility Information

	Project
Facility Name	Potentia-Viridi Battery Energy Storage System
Facility Address	17257 Patterson Pass Road Tracy, CA 95377
Facility Phone number	TBD
Facility Mailing Address	17257 Patterson Pass Road, Tracy, CA 95377
Owner or Operator Name	Levy Alameda, LLC
Owner Or Operator Address	155 Wellington Street W, Suite 2930 Toronto, Ontario M5V 3H1, Canada

Table 3. Emergency Response Phone Numbers

Resource	Phone Number	Address
Emergency Coordinator	TBD	TBD
Ambulance, Fire, Police and CHP	911	Call or Text
Nearest Fire Station	Tracy Fire Department 209.831.6700	835 N Central Ave, Tracy, CA 95376
Nearest Police Station	Tracy Police Department 209.831.6550	1000 Civic Center Drive Tracy, CA 95376
Nearest Medical Facility	Sutter Tracy Community Hospital 209.835.1500	1420 N Tracy Boulevard Tracy, CA 95376
Local Unified Program Agency (CUPA)	Alameda County Department of Environmental Health 510.567.6702	1131 Harbor Bay Parkway Alameda, CA 94502-6577
California State Warning Center / CAL OES	800.852.7550	
National Response Center (NRC)	800.424.8802	
Poison Control Center	800.222.1222	

4.3 Agency Notification Phone Numbers

Table 4. Agency Notification Phone Numbers

Agency	Phone Number / Email	Address
California Department of Toxic Substance Control (DTSC)	916.255.3545	
San Francisco Bay Regional Water Quality Control Board	510.622.2300 or spillreportR2@waterboards.ca.gov	1515 Clay Street, Suite 1400 Oakland, CA 94612

Table 4. Agency Notification Phone Numbers

Agency	Phone Number / Email	Address
US Environmental Protection Agency (EPA)	800.424.9346 – EPA Information Center phone number	US EPA Pacific Southwest, Region 9 75 Hawthorne St. San Francisco, CA 94105
California Department of Fish and Wildlife (CDFW)	916.358.2900	
US Coast Guard (USCG)	202.267.2180	
CAL OSHA	916.263.2800	
CAL Fire Office of the State Fire Marshal (OSFM)	916.323.7390	

4.4 Information and Documentation Submittals:

Documentation for HMBPs are submitted to the local CUPA by means of a statewide run database called the California Environmental Reporting System or CERS. To keep accuracy of the CERS database relevant to emergency response, project information is generally submitted just before, or when a project qualifies under one of the programs regulated under one of the Unified Programs. CERS Project information should be updated as frequently as needed to keep information current or at a minimum of once per year. If no changes are required to the plan or contacts, the Project may certify that there has been no change on the CERS database.

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5 Spill Prevention and Spill Response

5.1 Spill Prevention Measures

5.1.1 Emergency Equipment

The following emergency response equipment, containment supplies and personal protective equipment are anticipated to be available onsite at all stages of the project life. The location of the equipment will be determined based on accessibility during construction, operations and decommissioning and the Site Plan should be updated to denote the location.

Safety and First Aid Equipment

Safety glasses, hard hats, chemical protective gloves, first aid kits, portable eyewash kits and/or station.

Communication Equipment

Cell phones and automatic alarm systems as described in Section 2.4.

Firefighting equipment

Portable Fire extinguishers and individual fire detection system as described in Section 2.4.

Spill Control and Cleanup Equipment

All in one spill kit and spill kits with absorbent materials to absorb battery fluids, and leak proof, lined drums.

Safe Temporary Storage of Hazardous Waste

Safe designated Hazardous Waste Storage Location (to be determined) for storage of any hazardous waste generated during normal and emergency actions.

5.1.2 Vehicles and Transportation

Fuel Tank Loading and Unloading. The following tanker truck loading and unloading procedures will be followed when bulk petroleum product is delivered to the site:

- A spill kit containing booms, socks, and oil absorbent material will be on hand to contain any oil spills that may occur during fuel transfers.
- Appropriately trained personnel will regularly inspect the tank area for leaks, spills, signs of overflow and report any stained soil or oil sheen to the construction management team.

5.1.3 Temporary Fuel Storage Handling

Temporary fuel storage may be required during construction and decommissioning activities at the Project in the form of fueling tanks for onsite equipment and as auxiliary tanks to onsite generators. Tanks should be regularly inspected as part of project stormwater and safety inspections as required by local, state and federal law.

Spill Protection Procedures for ***Temporary Fuel Tanks and Auxiliary Fuel Tanks***:

- Establish dedicated equipment fueling and staging area that is clean and dry.
- The onsite fueling area should have a spill kit, and staff using the fueling area should be trained on the spill kit materials and how to use them.

5.2 Operational Prevention and Containment Procedures

The following are anticipated procedures for preventing, mitigating and containing releases and fires at the project site.

Monitoring

- In person inspections on a minimum of a weekly basis for leaks, ruptures and pressure build up of project battery systems and other facility components.
- 24-hour remote facility monitoring.
- Fire detection includes battery cell monitoring and infrared cameras to monitor cell temperatures. The system is designed to remove cells from operation should an anomaly be detected.

System Design:

- The BESS units are designed such that electrolytes added to the cells is absorbed into the cell material and is contained by the cell casing which prohibits material leaking from the cell even with water fire suppression techniques.
- The units are designed such that should a fire occur, it would not propagate to a neighboring cabinet.
- The BESS unit will be compliant with all applicable federal and international codes noted above.
- Onsite facility will be surrounded with fire resistant materials, usually a gravel surface, maintained free of weeds and other combustible materials.
- The onsite facility drains to detention basins located along the project perimetter, allowing for containment of larger releases if needed.

5.3 Spill Clean up and Containment

The standard procedures for all spills are as follows:

- All spills shall be immediately cleaned up upon discovery.
- The spill area shall be kept well ventilated, and personnel shall wear the appropriate protective clothing to prevent injury when cleaning up a spill.

- Use appropriate personal protective equipment and determine the source of the leak. Where appropriate, close valves, and press emergency fuel shut-off.
- Spills of hazardous materials shall be reported to the appropriate local, state, and federal authorities and/or regulatory agencies as required by law.
- All vehicles leaking oil or fluids shall be scheduled for maintenance, and drip plans shall be placed under the leak when parked prior to the maintenance event.
- All spill and cleanup material will be removed from site as soon as can be arranged and taken to a legal disposal facility.
- Use spill containment materials to absorb spill.
- Allow spill material to completely absorb the spill. Place spent sorbent material in appropriate hazardous waste container.

The designated discharge prevention person is responsible for determining whether the spill is reportable.

5.3.1 Large Spill Procedures

A hazardous materials spill at the site may be considered large based on the assessment of the onsite environmental personnel who are trained in spill prevention, control, and countermeasure management. Any oil spill that exceeds 42 gallons (one barrel) will be treated as a large spill. For any large spills, the following procedures shall be followed:

- Site personnel shall evacuate facility staff from the immediate area.
- Site personnel shall report immediately to the first available facility emergency contact.
- If possible, site personnel shall stay upwind.
- Site personnel shall don appropriate personal protective equipment and determine the source of the leak. Where appropriate, close valves and press emergency fuel shutoff.
- Site personnel shall use spill containment materials to keep spill from spreading and discharging off site.
- The emergency contact will contact the on-call spill response contractor for cleanup and disposal of fuel and sorbent materials.
- The emergency contact is responsible for reporting to the following agencies, as necessary. Reporting depends upon quantity spilled, nature of the spill, etc.
- Refer to the emergency contacts listed in Section 4 of this Plan.

Follow-up documentation, including the submission of an oil/hazardous substance discharge report, if necessary, will be the responsibility of the designated discharge prevention person. Additional documentation will include the description of corrective actions taken, root cause analysis of the spill event, and characterization of the resulting environmental or health and safety impacts.

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6 Training and Recordkeeping

6.1 Employee Training and Discharge Prevention

Employee training is required for all employees and contractors handling hazardous materials or hazardous wastes during normal or emergency situations. The actual training plan will be determined based on the specific company's requirements in their Illness Injury Preventative Program Documents.

Training of personal should be a combination of formal classroom videos, regularly scheduled safety meetings, onsite guides and manuals and hands on training for specific tasks for the following subject areas:

- The 2012 federal Hazard Communication Standard (HCS, 29 CFR 1910.1200(g)) and other applicable state and local laws. The HCS contains general information about the chemical, identification, hazards, composition, safe handling practices, and emergency control measures (e.g., fire fighting).
- The procedures outlined in this plan for emergency response, and emergency evacuation.
- Notification and coordination procedures for onsite personnel, neighboring properties, local emergency responders, CUPA, and Cal OES.
- Communication and alarm systems specific to the project site.
- Location and availability of personal protective equipment, and how to use them.
- Location and availability of spill containment and response materials and equipment and how and when to use them (fire extinguishers, respirators, spill control kits).
- Identification of facility areas, equipment and systems vulnerable to earthquakes, fire, and other natural disasters.

Training of employees should be documented and refreshed on a regular (ie annual) basis.

6.2 Recordkeeping

6.2.1 Employee, Visitor and Contractor Training

Training of employees should be documented and refreshed on a regular (i.e., annual) basis including a description of the types and methods used for training and copies of any training materials.

6.2.2 HMBP as-needed and Annual Updates

This Hazardous Material Business Plan (HMBP) has been written as part of the project development documents for the County to describe anticipated hazardous materials, employee training and emergency response for the Project.

Hazardous Materials Business Plans are submitted for electronic filing into a statewide database called the California Environmental Reporting System (CERS) once a project begins construction and will continue to be maintained online throughout operations until the site is decommissioned. The originally submitted documentation will need to be reviewed, and any changes will be uploaded, just prior to construction and re-certified at least once annually in the CERS system.

6.2.3 Inspections

It is recommended that the weekly onsite inspection information be recorded and kept for a period of at least one year.

7 References

California Code of Regulations, 2018, California Legislative Law, California Health and Safety Code, Division 20, Chapter 6.11, Sections 25404-25404.9, Effective July 1, 2018. https://calepa.ca.gov/cupa/lawsregs/ accessed June 3, 2024.

California Code of Regulations, 2018, Title 27, Division 1, Subdivision 4, Chapter 1, Sections 15100-15620., Effective July 1, 2018, https://calepa.ca.gov/cupa/lawsregs/ accessed June 3, 2024.

California Code of Regulations, 2018, Title 27, Division 3, Subdivision 1- Data Dictionary, Effective July 1, 2018, https://calepa.ca.gov/cupa/lawsregs/ accessed June 3, 2024.

Cal EPA. *Consolidated Emergency Response/Contingency Plan*. March 12, 2022 CONSOLIDATED EMERGENCY RESPONSE / CONTINGENCY PLAN (ca.gov)

Cal EPA. *Instructions for completing the CERS*. March 12, 2022 Instructions for Preparing CERS Consolidated Emergency Response/Contingency Plan (ca.gov)

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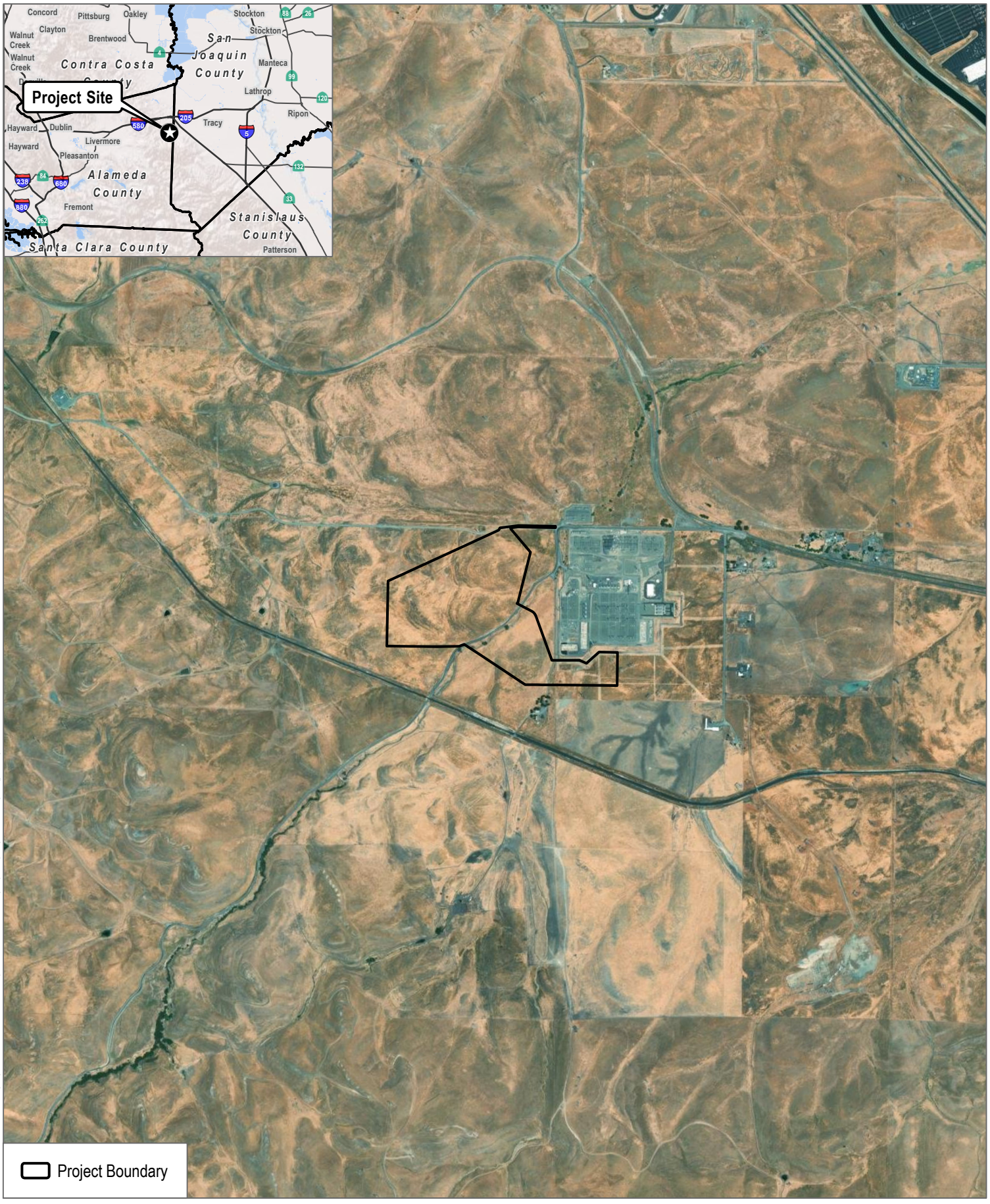

SOURCE: Bing Maps 2023

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0 500 1,000 Feet

FIGURE 1

Project Location

Potentia Viridi BESS Project

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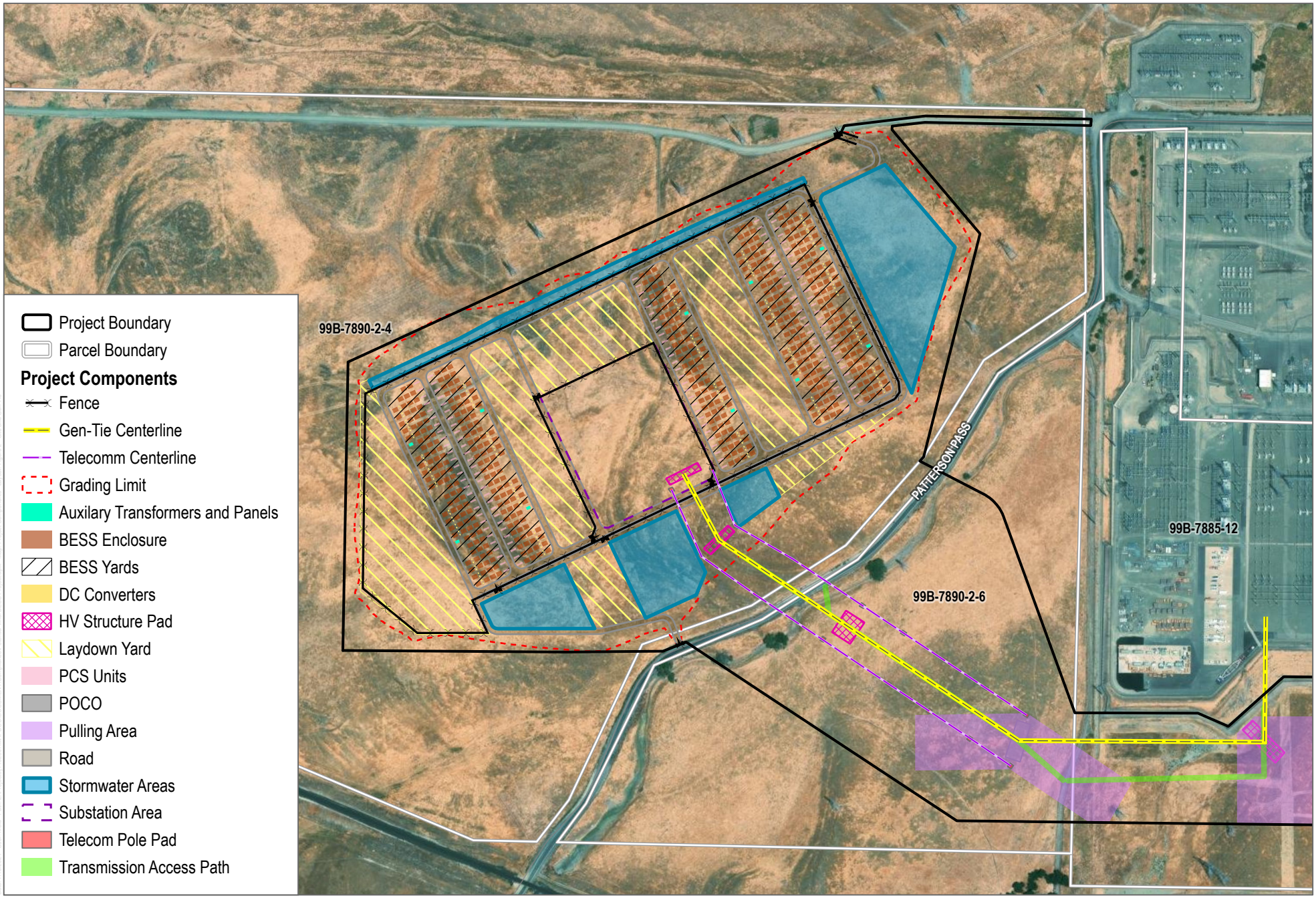

SOURCE: Bing Maps 2023, County of Alameda 2022

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0 230 460 Feet

FIGURE 2

Project Components

Potentia Viridi BESS Project

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