

SEPTEMBER 23, 2023 AT 15.45 PM PT

Page 01

RUTH BROCK'S EMAIL CORRESPONDENCE WITH LA COUNTY FIRE DEPARTMENT REQUESTING A DETAILED HAZARD MITIGATION ANALYSIS (HMA) BE REQUIRED FOR THE PROPOSED HECATE GRID HUMIDOR STORAGE 1 BESS FACILITY TO BE LOCATED IN ACTON, CA

FROM: Ruth Brock <actontakesaction@att.net>
TO: Albert Yanagisawa <Albert.Yanagisawa@fire.lacounty.gov>
CC: Barger, Kathryn <Kathryn@bos.lacounty.gov>
Bostwick, Charles <CBostwick@bos.lacounty.gov>
Acton Town Council <atc@actontowncouncil.org>
***Jeremiah Owen <jeremiahowen@gmail.com>
Amy Bodek <ABodek@planning.lacounty.gov>
Anthony Curzi <acurzi@planning.lacounty.gov>

SUBJECT: Hecate Humidor BESS project inquiry

Hello Chief Yanagisawa,

As one of the lead representatives of Acton in the opposition to the Hecate Humidor BESS project, I am reaching out once again on behalf of my fellow concerned Acton residents.

I have been researching safety measures and hazards associated with Battery Energy Storage facilities, and I have come across ICC 104.8.2 which allows the Fire Code official to require a project to provide a detailed Hazard Mitigation Analysis (HMA).

Will you be requiring this HMA for the Hecate Humidor project?

This is stated recommended industry requirement for any BESS facilities that exceed 600 MWh in energy capacity, which Hecate Humidor does at 400 MW/1600MWh.

<https://codes.iccsafe.org/s/IFC2021P2/chapter-1-scope-and-administration/IFC2021P2-Pt01-Ch01-SubCh02-Sec104.8.2>

[A] 104.8.2 Technical Assistance.

To determine the acceptability of technologies, processes, products, facilities, materials and uses attending the design, operation or use of a building or premises subject to inspection by the fire code official, the fire code official is authorized to require the owner or owner's authorized agent to provide, without charge to the jurisdiction, a technical opinion and report. The opinion and report shall be prepared by a qualified engineer, specialist, laboratory or fire safety specialty organization acceptable to the fire code official and shall analyze the fire safety properties of the design, operation or use of the building or premises and the facilities and appurtenances situated thereon, to recommend necessary changes. The fire code official is authorized to require design submittals to be prepared by, and bear the stamp of, a registered design professional.

RUTH BROCK'S EMAIL CORRESPONDENCE WITH LA COUNTY FIRE DEPARTMENT REQUESTING A DETAILED HAZARD MITIGATION ANALYSIS (HMA) BE REQUIRED FOR THE PROPOSED HECATE GRID HUMIDOR STORAGE 1 BESS FACILITY TO BE LOCATED IN ACTON, CA — CONTINUED...

In this link to ScienceDirect: "Lithium-ion battery energy storage systems (BESS) hazards"

<https://www.sciencedirect.com/science/article/abs/pii/S095042302200208X>

The article states the following:

Codes and Standards

The following codes and standards are currently considered by the industry for the installation of BESS and the hazard mitigation analysis for those systems. Once a BESS exceeds 600 kWh in energy capacity, a hazard mitigation analysis (HMA) that can help identifying additional mitigation measures is typically required.

2021 International Fire Code (IFC), Chapter 12, Electric Energy Storage Systems:

- The 2021 edition of the International Fire Code provides prescriptive requirements and identifies:

HAZARD ANALYSIS

An evaluation of potential energy storage system failure modes and the safety-related consequences attributed to the failures is good practice and a requirement when industry standards are being followed. It was established above that several national and international codes and standards require that a hazard mitigation analysis (HMA) is performed. Consequences and failure modes must be evaluated that include thermal runaway condition in a single module, array, or unit, for example.

PREVENTION AND MITIGATION MEASURES

Prevention measures should be directed at thermal runaway. This is by far the most severe BESS failure mode as demonstrated in the introduction to the hazard mitigation analysis. If it cannot be stopped, fire and explosion are the most severe consequences. The battery management system (BMS) provides the primary thermal runaway protection and is one of the most important barriers. This is why BESS safety standards, such as NFPA 855, require that the BMS is evaluated together with the batteries.

Chief Yanagisawa, we believe a HMA is absolutely necessary as a requirement for this proposed project, not just for the safety of our residents of Acton but also for your HAZMAT squad and supporting firefighters who would respond to an incident at the BESS.

As an example, there was a recent fire incident on Sept. 19th at the Valley Center BESS in San Diego County which was small and was successfully contained to the facility but required the following during the response:

RUTH BROCK'S EMAIL CORRESPONDENCE WITH LA COUNTY FIRE DEPARTMENT REQUESTING A DETAILED HAZARD MITIGATION ANALYSIS (HMA) BE REQUIRED FOR THE PROPOSED HECATE GRID HUMIDOR STORAGE 1 BESS FACILITY TO BE LOCATED IN ACTON, CA — CONTINUED...

- Evacuation of 1/4 mile radius of facility
- Shelter in place of 1/2 mile radius.
- The all-clear was given after 4 hours.

<https://pv-magazine-usa.com/2023/09/19/lithium-ion-battery-fire-in-california-energy-storage-facility/>

The Valley Center BESS was required to provide a HMA. I'm certain this helped the incident response be more safe for fire personnel and helped facilitate the evacuation and shelter in place in a more timely manner because the Fire IC knew exactly what they were dealing with.

Below is their HMA which provides great detail and helpful information for incident responses by fire personnel.

https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/STP-20-011/Hazards%20Analysis_VCStorage_2020-07-14.pdf

Chief, please require an HMA of the Hecate Humidor project, especially in light that this project with known potential for fire risk has been given ministerial approval through a simple site plan review. This review process was greatly inferior to that which the CEC approval process would have required.

It's insanity for this project to be sited amongst residential ranches in east Acton in a designated and mapped VERY HIGH FIRE HAZARD AREA. This same area is designated and mapped by the CPUC and the map adopted by SCE as an EXTREME FIRE SEVERITY RISK AREA.

It stuns the residents of Acton that LA County would allow this project to be sited in this location, putting our residents at such risk when there are so many other siting location alternatives more appropriate that would not pose safety and health risk to people— nor devalue their property for which they have worked so hard.

Thank you,

Ruthie Brock

Representing the residents of Acton through our community task force, Acton Takes Action

LA COUNTY FIRE DEPARTMENT CHIEF YANIGASAWA'S RESPONSE BEGINS ON PAGE 4.

LACoFD CHIEF YANIGASAWA'S RESPONSE TO RUTH BROCK'S EMAIL CORRESPONDENCE WITH LA COUNTY FIRE DEPARTMENT REQUESTING A DETAILED HAZARD MITIGATION ANALYSIS (HMA) BE REQUIRED FOR THE PROPOSED HECATE GRID HUMIDOR STORAGE 1 BESS FACILITY TO BE LOCATED IN ACTON, CA

On Sunday, September 24, 2023, 7:17 AM, Albert Yanagisawa <Albert.Yanagisawa@fire.lacounty.gov> wrote:

Dear Ms. Brock,

Thank you for your email addressing the Hecate Humidor Battery Energy Storage System (BESS) project and the concerns of the residents of Acton. Your research and citation of ICC 104.8.2 and other industry standards are duly noted.

The International Fire Code (IFC) does authorize the Fire Code official to require a detailed Hazard Mitigation Analysis (HMA) for projects such as the Hecate Humidor BESS facility. Given that this project may energy capacity indicated as a threshold for HMA, I can confirm that it is under consideration to require an HMA as part of the project's safety review process.

Your point regarding the recent incident at the Valley Center BESS in San Diego County is taken into consideration. HMAs can indeed provide invaluable information for incident responses, enabling first responders to act more efficiently and safely.

Regarding your concern about the location of the project in a Very High Fire Hazard Area, I assure you that we take this matter seriously. The Los Angeles County Fire Department is committed to ensuring the safety and well-being of all county residents and emergency response personnel.

I understand your concerns about the ministerial approval process for the project and the potential risks it poses to the community and first responders. Rest assured, we are diligently reviewing all relevant codes, standards, and project-specific factors as part of our safety assessment.

Thank you for representing the concerns of Acton residents and for your dedication to community safety.

Sincerely,

Albert T Yanagisawa
Assistant Chief Fire Marshal
Los Angeles County Fire Department
Fire Prevention Division

Albert.Yanagisawa@fire.lacounty.gov
(323) 346-4092
5823 Rickenbacker Rd
Commerce, Ca 90040

fire.lacounty.gov