

ATTACHMENT 4

Emergency / Contingency Plan for Accidental Spills

Names, Locations, and Quantities of Chemicals on Site

Lithium Iron Phosphate (LFP) batteries comprise the entirety of the source of hazardous material to be used on site. The battery array will be located within a fenced area as shown on the attached site plan. The fenced area is approximately 400 feet from New London Road, 700 feet from the nearest residence to the North, 400 feet from the commercial building to the west, and 700 feet from the nearest residence to the east. Each battery pack will contain 104 individual lithium battery cells. There are 48 packs installed in 12 racks, for a total of 4,992 individual battery cells in each battery module (container), with 5 containers initially installed on-site. Each battery container weighs 94,800 lbs, so total weight of all containers on site will be 474,000 lbs.

The primary hazardous material of concern is the LFP electrolyte within the individual battery cells. Each battery cell contains approximately a quarter gallon of electrolyte; each module contains approximately 1,200 gallons of electrolyte, and there is a total of 6,000 gallons of electrolyte across the site on Day 1, with a total of 8,400 gallons of electrolyte with the two additional augmentation battery modules.

Potential Paths of Flow and Effected Waterbodies from Chemical Containers in the Event of a Spill

The majority of lithium content on-site will be in its solid state, with the remainder suspended in the battery electrolyte. An even smaller percentage of this electrolyte is comprised of free-standing electrolyte that presents a spill risk in the event the cell container is compromised. However unlikely, in the event of a spill of water utilized for fire suppression purposes, or of released electrolyte containing lithium, the runoff would flow toward the storm water retention basin adjacent to the BESF.

Proposed Stormwater and Erosion Controls

FLL will use the following measures to protect watershed resources: (1) multiple layers of Compost Filter Socks and Silt Fence protecting the downstream to prevent sediment run-off into water sources and (2) the installation of a stormwater management basin post-construction so that any sediments associated with the project site settle before water enters the watershed. Any temporary perimeter E&S controls will be removed following approval from the Planning Board and once the site is sufficiently stabilized (i.e. 70% vegetative cover).

Endangered Species and Historical Preservation Areas

Per the Connecticut NDDB database, no endangered species habitats or historical preservation sites are located in the vicinity of the project site.

Facility Spill History

There is no previous history of spills at this facility. No corrective action has been taken at this facility.

Spill Prevention Measures

The batteries on site shall not be opened under any normal circumstance. Each battery unit is hermetically sealed during normal operation. This hermetic seal will also act as the primary containment in the unlikely event of a spill from the battery unit. The larger enclosures provide a form of secondary containment in the event individual cell containers are compromised and liquid electrolyte leaks from the cells. It is highly unlikely that a significant quantity of the cells within an enclosure would simultaneously rupture and leak electrolyte. Furthermore, the liquid electrolyte is a more viscous material, further reducing the possibility of any prolonged leakage from the cells containers and the larger enclosures.

In the unlikely event of a catastrophic release from any of the battery cells, the enclosures provide a measure of secondary containment that provide an impervious barrier to the exterior environment and prevent any immediate environmental exposure.

FLL has additionally committed manpower and resources to control and remove any lithium that becomes exposed to the exterior environment through any catastrophic event. A spill kit is in close proximity for use in the event of a spill. In addition, the outer envelopes of the battery enclosures are to be inspected monthly.

Storage Container Information

The battery storage units are hermetically sealed. Between inspections no activity will occur on site. The most significant potential for damage to the hermetic seal is during the shipping process. If the components arrive to the site and are installed without damage to the seal, it is unlikely the seal will fail unless it is intentionally damaged or still in use past its expected lifespan.

Potential Leaks of Buried or Exposed Pipelines

No liquid pipeline, buried or exposed, is proposed on site. Electrical conduit is proposed but has no risk of leaking.

Vehicle Loading/Unloading Procedures

FLL will not utilize any vehicle loading/unloading racks on site and does not anticipate heavy truck traffic on site after the installation of the battery storage facility. No hazardous materials will be delivered to the facility.

Inspection Procedure

Batteries will be inspected monthly by qualified, trained personnel. The inspection will look for any signs that the hermetic seal has been broken. Visual inspection of the surrounding equipment pad and ground cover will also be conducted for signs of leaks.

Site Security Plan

Unauthorized access to the site may increase the potential for spills if untrained persons come into contact with the proposed system. To prevent unauthorized person from accessing the equipment a 7' tall aluminum security fence with a locking double swing gate is proposed.

Personnel Training

The Environmental, Health & Safety (EHS) Manager is the designated person accountable for spill prevention at BlueWave (the Primary SPCC Coordinator). This person also has the authority to implement spill removal actions. The EHS Specialist will serve as the Alternate Spill Coordinator. During the annual FLL SPCC training, spill prevention will be discussed. Sign-in sheets, which include the topics of discussion at each meeting, shall be maintained for documentation.

Emergency Contacts

Table 1. Emergency Contacts Internal Notifications

SPCC Coordinators	
Primary SPCC Coordinator Joe McGee	Office: (617) 209-3122 Mobile: N/A

Table 2. Emergency Contacts Off-site Notifications

City/State Agencies	
Salem Fire Department	911 Non-Emergency (860) 859-0942
Salem Police Department	911 Non-Emergency (860) 859-3873
Connecticut State Police Department	911 or Dispatch Center (860) 896-3200
Connecticut DEEP Spill Hotline	1-866-DEP-SPIL
Federal Agencies	
National Response Center	(800) 424-8802
EPA Region 1	Main Number (888) 372-7341 Environmental Emergencies (800) 424-8802

Spill Response Procedures

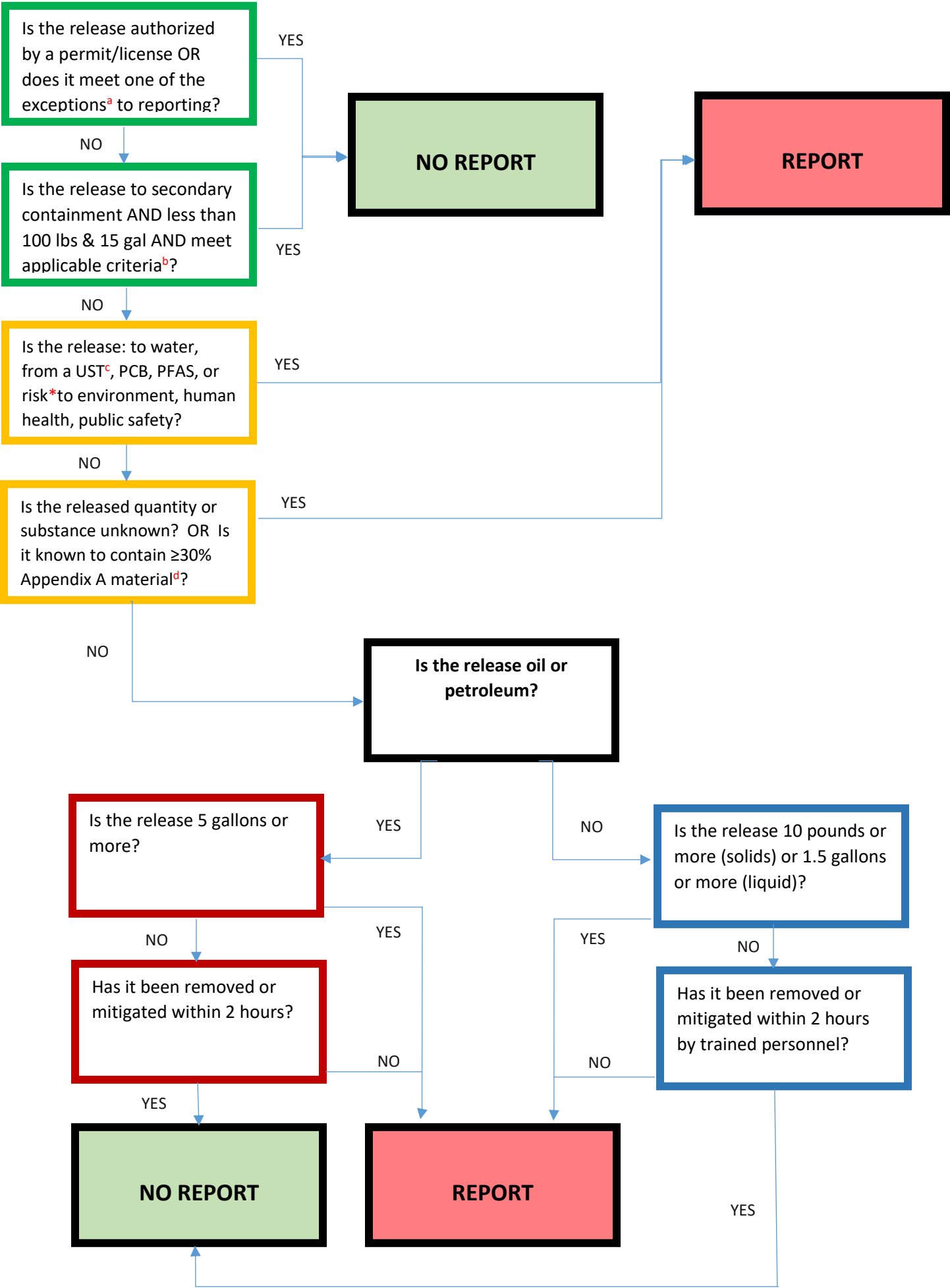
1. Extinguish all sources of ignition.
2. Isolate incompatible or reactive chemical substances.
3. Determine if the spill is incidental¹ or non-incidental².
4. Before attempting to stop or contain any potential spill, allow for any potentially released hazardous fumes to dissipate, and utilize proper PPE when using spill response equipment.
5. For incidental spills (see definition below) - Without endangering yourself or others, attempt to stop or contain the spill at the source (e.g., plug leaks, deploy absorbent materials, cover drains, etc.).
6. For non-incidental spills (see definition below) - Immediately report the spill to the Primary SPCC Coordinator. Do not attempt emergency response measures.
7. Isolate all potential environmental receptors including drains, sumps, soil, etc. through the placement of drain covers, plugs, berms, absorbent materials etc.
8. Report to the Primary SPCC Coordinator or Alternate SPCC Coordinator who will conduct all necessary reporting to external agencies:
 - a. If a spill of hazardous waste/material exceeds the Connecticut Department of Energy and Environmental Protection (CT DEEP) limits as shown in the Flow Chart (attached below) - report to CT DEEP and the Local Emergency Planning Commission (Salem Fire Departments).
 - b. If spill migrates off FLL's leased property and/or results in personal injury - also report to the Salem Fire Departments.
 - c. If spill causes a sheen or discoloration of navigable waters or adjoining shorelines - also report to the National Response Center (NRC).
9. Response contractor will recover material spilled, clean up spill area, and securely containerize and stage or dispose of contaminated material and waste.
10. Decontaminate tools and equipment. Collect all rinsate and debris.
11. Dispose of waste materials in accordance with all applicable regulations (i.e., 310 CMR 30.000) and procedures. The SPCC Coordinator will confirm that the waste is appropriately stored, labeled, and profiled for disposal.
12. The SPCC Coordinator will conduct follow-up written notifications to applicable agencies.
13. The SPCC Coordinator will coordinate an incident analysis with the involved parties to develop plans necessary to prevent recurrence.

¹ “**Incidental**” spill is defined as a spill which meets ALL of the following criteria: 1) personnel are familiar with the hazards associated with the spilled material; 2) containment/response does not pose potential health and safety hazards (e.g. fire, explosion or chemical exposure); 3) a small quantity (less than ten gallons) of oil is spilled/released which DOES NOT reach the environment or pose potential health and safety hazards, and 4) spilled/released material can be readily absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate area or by maintenance personnel.

² “**Non-incidental**” spills include: 1) major spills/release (e.g. greater than ten gallons) that do not reach the environment or 2) any amount of spilled oil that reaches the environment.

CONNECTICUT RELEASE REPORTING REGULATIONS – REPORTABLE QUANTITIES

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Footnotes

- ^aExceptions – Allowed (regardless of exceedance or violation) by:
- 1) State or federal law;
 - 2) Judgement or order of the court;
 - 3) Contained under a laboratory fume hood;
 - 4) Minor sheen from roadway, parking lot, driveway normal vehicle use;
 - 5) Food products (if it does not pose a risk to human health or the environment);
 - 6) Domestic sewage less than 100 gallons;

^bCriteria for releases to containment, must be cleaned within 2 hours AND must NOT be:

- 1) more than 100lbs or 15gal.; 2) involve a UST or PCB; 3) create an emergency

^cUnless it is limited to drips from nozzle during dispensing;

^dUnless contained under a laboratory fume hood

*risk includes actual or imminent releases per 22a-450-2(c)

KEY

- = exceptions
- = oil or petroleum
- = non-petroleum
- = always report