# Emergency Response Plan

## Prospect and Janus Solar + Storage Projects

October 2023

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# 1 General Information

The following Emergency Response Plan has been established to ensure Prospect and Janus Solar + Storage Projects can adequately and effectively respond to an emergency during the construction and/or operations phases of the project.

## 1.1 Project Description

Horus Energy is proposing to construct and operate the Prospect and Janus Solar + Storage Projects (the "Projects"), a 200 MWac solar energy generation with a 100MW battery energy storage and an 80 MWac solar energy generation with a 20MW battery energy storage located in Weld County.
The Project is further described as follows:

1. The Projects are a combined 280 MWac solar PV facility and 120MW battery energy storage facility (BESS) located on approximately 2,200 acres of privately-owned agricultural land.
2. The perimeter is planned to be fenced and accessible via distinct access points during the construction phase.
3. Access throughout the site is provided by gravel surfaced access routes.
4. The Project shall consist of approximately 582,000 solar photovoltaic modules. The PV modules are mounted on a single axis tracker system.
5. The project will contain 79 inverter/transformer stations and 29 BESS inverter stations.
6. An Operations and Maintenance facility will be located adjacent to the substation and will house safety equipment.
7. The project will be controlled by telecommunications equipment located in buildings within the substation.

## 1.2 Emergency Authority and Point of Contact

The designated project Emergency Point of Contact ("POC") will be responsible for overseeing emergency service compliance. Their duties will include ensuring that the measures in this plan are clearly communicated to project personnel as well as all agencies that the Project interacts with. In addition, their duties will include compliance with this ERP and that all agencies and appropriate stakeholders (including but not limited to local residents, emergency response units, transmission utility, and project owner) are properly notified in the event notification is required, and that all required plans and reports are prepared and submitted in a timely manner.

The Emergency Point of Contact during the construction phase of the Project will be designated as a representative of the Engineering, Procurement, Construction, and Management ("EPCM") contractor. During the operations phase, a site operations manager will assume responsibility for emergency services.

*Table 1. Emergency Contacts – Construction Phase*

| **Construction Phase Contacts:** | | | |
|---|---|---|---|
| Primary Contact | TBD | Cell Phone: | Email: |
| Secondary Contact | TBD | Cell Phone: | Email: |

*Table 2. Emergency Contacts – Operations Phase*

| **Operations and Maintenance Phase Contacts:** | | | |
|---|---|---|---|
| Primary Contact | TBD | Cell Phone: | Email: |
| Secondary Contact | TBD | Cell Phone: | Email: |

## 1.3 Emergency Response Agencies

*Table 3. Emergency Response Agency Contacts*

| **FIRE / EMS / POLICE: 911** | | | |
|---|---|---|---|
| **Department** | Contact Name | Telephone | Address |
| **Weld County Emergency Services** | | | |
| | | | |
| | | | |
| | | | |

## 1.4 Site Access

The Janus Project is in Weld County as shown in *Figure 1. Project Location*.

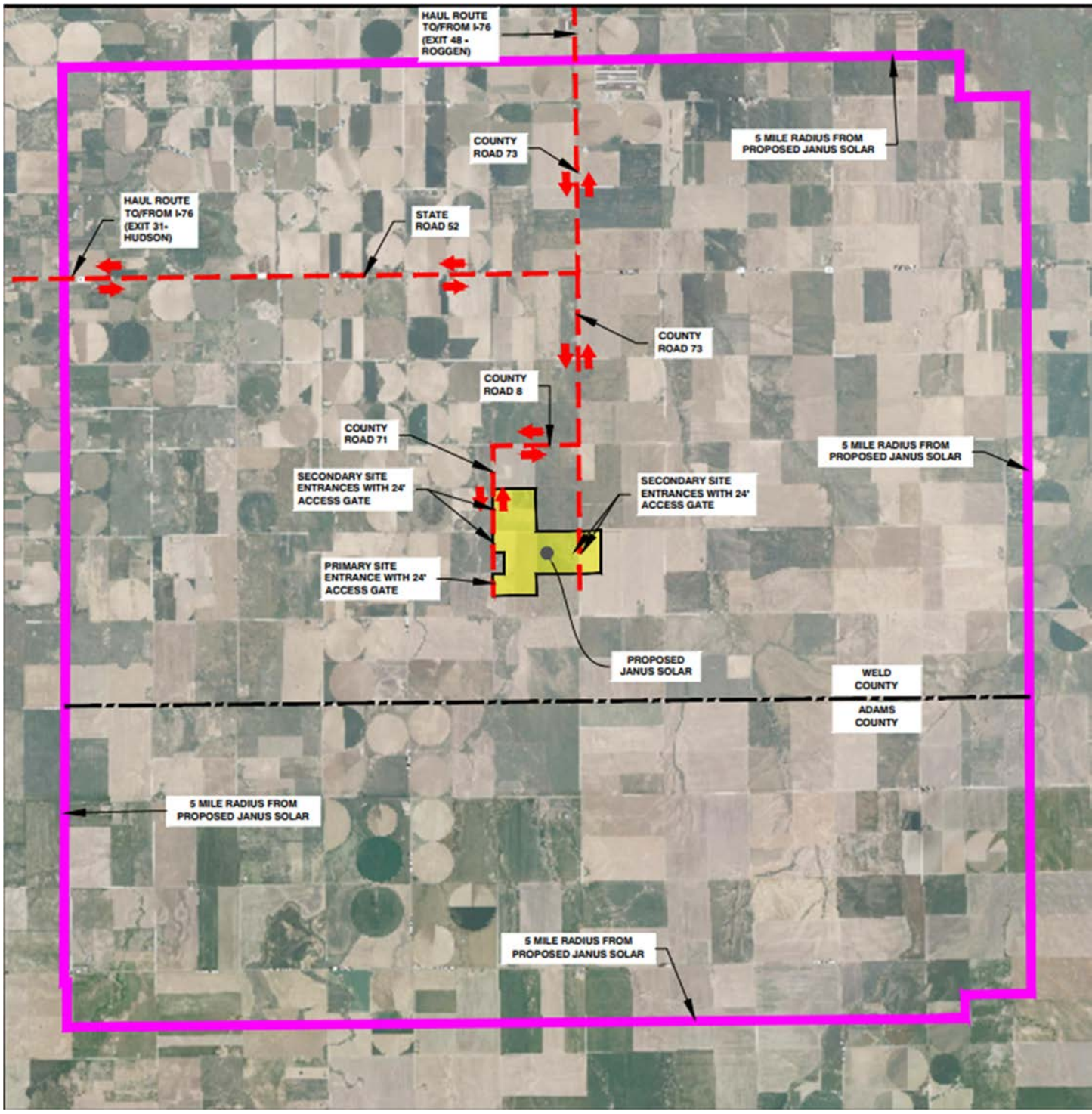


*Figure 1. Project Location*

The Prospect Project is in Weld County as shown in *Figure 2. Project Location*.

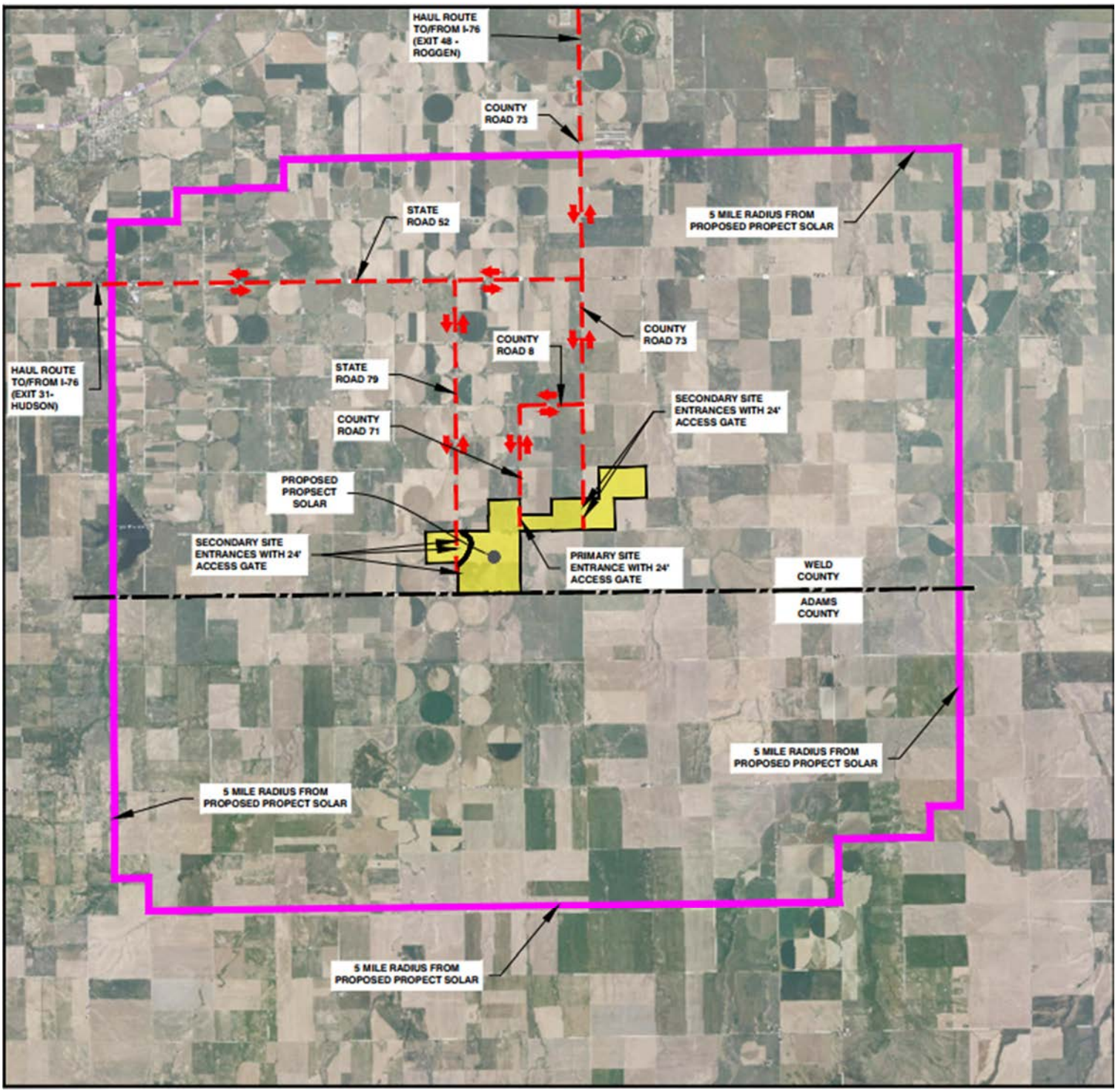


*Figure 2. Project Location*

During the construction phase access to the Project site will be from multiple access points and will follow project access routes and where necessary these routes will be upgraded to ensure access to key Project locations, including muster areas, substation, laydown yards, and main points of access.

# 2 Emergency Procedures

All employees, contractors and subcontractors will receive safety training and briefing regarding the Emergency Response Plan before they begin work onsite. This training will include pertinent information regarding hazardous material and fire prevention.

## 2.1 Communication and Training Procedures

The Emergency POC will be responsible for ensuring proper training is received by all personnel. The Emergency POC will maintain a directory of all project participants and subcontractor leadership contacts to adequately communicate any emergency situations.

## 2.2 Types of Emergencies

- Medical Emergency: worker injury or personal medical issue
- Fire: wildland/grassfire or electrical fire
- Severe Weather/Catastrophic Emergency: tornado, high wind event, blizzard, flood, lightning
- Hazardous Material Emergency: chemical spills, equipment failures, environmental conditions dangerous to personnel.
- Electrocution: contact with AC or DC conductors or step and touch hazards
- Vehicle: vehicle incident

# 3 Emergencies

## 3.1 Project Team

The Engineering, Procurement, Construction, and Management (EPCM) Contractor for the Project will be determined at a later time once the Project is permitted. The Project team will consist of:

*Table 4. EPC Project Team*

| Position | Organization | Name | Telephone |
|---|---|---|---|
| **EPC Project Manager** | | | |
| **Construction Superintendent** | | | |
| **Engineering Lead** | | | |
| **Environmental Lead** | | | |

The EPCM Contractor will provide updated contact information prior to mobilization to site and distribute during site orientations given to each employee. Upon completion of construction, the Operations

Contractor will assume control of the site, at such time each contractor will ensure proper transition and updating of this Plan has occurred and that all personnel are made aware of any changes.

## 3.2 Emergency Medical Care

Only provide care to injured persons if it is safe to do so and you are trained in First Aid/CPR or for the care required. Each Supervisor or Team Leader will identify each member of their respective crews who are First-Aid/CPR trained. In the event of a major-medical emergency, on-site personnel who are professionally trained should immediately assess the patient in conjunction with immediate notification to 9-1-1 and/or local or onsite Emergency Medical Services.

## 3.3 Equipment Requirements

The following equipment will be kept on-site (at a minimum) to support on-site care:

- First Aid Kits: standard kits containing supplies for care of minor injuries or ailments. One (1) kit per crew and one (1) kit in each jobsite office
- Automated External Defibrillator (AED): portable device capable of restoring normal cardiac rhythm during cardiac arrest. One (1) in the jobsite office, One (1) in designed Site Safety Manager vehicle.
- Emergency use non-conductive rescue hook. One (1) in each jobsite office, One (1) in designed Site Safety Manager vehicle, One (1) at substation once energized.

All First Aid equipment should be stored in clean, dry area, accessible for regular inspection by crews and have documentation indicating equipment is in proper working order and supply is adequate. Replace any questionable, expired or exhausted supplies immediately.

# 4 Fire Protection and Prevention

## 4.1 Purpose & Need for Fire Prevention Plan (FPP)

- Eliminate the potential risks and/or causes of fires.
- Prevent loss of life and property by fire
- Educate employees to promote a safe environment.
- Be prepared should a fire occur.
- Outline a procedure to follow for the safety of the individuals on site at the time of the occurrence.
- Identify risk factors and hazards.
- Set up proper storage procedures, training, and identification of personnel responsible for maintaining and servicing the equipment and systems on site that are used to prevent and/or control a fire.

## 4.2 Responsibilities and Procedures

Safety is everyone's responsibility on site. All employees are to be trained and should know how to prevent and respond to a fire emergency. All employees must:

- Complete an on-site training program identifying the fire risks for the project site.

- Know the protocol and follow emergency procedures should an event occur.
- Review and report potential fire hazards to the Onsite Primary Contact.

## 4.3 Hazards Associated with Solar PV

Photovoltaic (PV) solar arrays present a unique challenge for fire fighters. Unlike a typical electrical or gas utility, a PV array and collection system does not have a single point of disconnect. Whereas there are disconnects that will de-energize select parts of the system, if the PV panels are illuminated, the individual strings of PV panels are energized and capable of producing up to 1,500 volts. Below is a summary of the hazards associated with firefighting activities in photovoltaic solar arrays:

- Shock hazard due to the presence of water and PV power during suppression activities
- Outdoor rated electrical enclosures may not resist water intrusion from the high-pressure stream of a fire hose.
- PV panels damaged in the fire may not resist water intrusion.
- Damaged conductors may not resist water intrusion
- Shock hazard due to direct contact with energized components
- No means of complete electrical disconnect
- Multiple power sources
- Due to the dangers presented above, it is not typical to practice fire suppression by means of water inundation within solar PV arrays.

## 4.4 Hazards Associated with Battery Energy Storage Systems

In 2020, the American National Fire Protection Association published NFPA 855, *Standard for the Installation of Stationary Energy Storage Systems,* which addresses the dangers of toxic and flammable gases, stranded energy, and increase fire intensity associated with stationary energy storage systems. In general, the hazards inherent in BESS include fire and explosion, chemical, electrical, stranded or stored energy, and physical hazards. These hazards vary based on the technology used and the operating conditions.

The Project currently contemplates the use of lithium-ion (Li-ion) batteries. Hazards specific to Li-ion batteries under **normal** conditions include:

- Fire due to latent defects in the cells themselves or design issues related to the system controls
- Electrical hazards due to the risk of direct contact with high voltage equipment or high battery energy levels
- Stranded or stored energy hazards can exist if the batteries cannot be discharged or isolated for routine maintenance or replacement

Hazard considerations for Li-ion batteries under **abnormal/emergency** conditions include:

- Fire due to short circuiting and thermal runaway conditions if batteries are not maintained at appropriate operating parameters due to abnormal conditions
- Chemical hazards may be present via off-gassing or hazardous vapours
- Electrical hazards may exist if the BESS is at hazardous voltage and energy levels
- Stranded or stored energy under normal and abnormal conditions are similar. Damaged batteries may contain stored energy, which may pose a hazard during disposal.
- Physical hazards may exist due to overheating parts, damaged moving parts (e.g. fans)

## 4.5 Considerations for Emergency Responder Pre-incident Planning

The deployment and long-term operation of utility-scale BESS poses an additional challenge for rural first responders and fire fighters. NFPA 855, Annex C contains valuable information for first responders to safely and effectively respond to incidents that involve battery energy storage systems. Fire departments are encouraged to develop pre-incident plans for responding to fires, explosions, and other incidents associated with BESS installations and include:

- Awareness and understanding of procedures involved with the BESS facility operations and ERP
- Knowledge of technology (battery type) and the related hazards and methods for responding to the particular type of BESS
- Identifying the locations of all electrical disconnects
- Understanding that there may be stored or stranded electrical energy in the BESS that cannot be discharged or isolated
- Understanding procedures related to dealing with damaged BESS equipment.
- Contacting the Operations and Maintenance Manager or BESS subject matter expert to control or remove damaged equipment

## 4.6 Overheated Battery

If a fault occurs in the BESS and overheating of a battery cell(s) continues unchecked, damage may occur resulting in swelling, off-gassing, fire, or even explosion. Response to an overheated battery should include the following steps as outlined in NFPA 855, Annex C:

- Isolating area of all non-essential personnel
- Reviewing the status of the BESS buildings/containers, BESS alarm system, and facility with available system monitoring data
- Performing air monitoring of any connected spaces
- Identifying the location of overheated battery(s)
- Isolating the affected battery, string, or entire system based on the extent of damage by opening battery disconnect switched where possible
- Contacting the Operations and Maintenance Manager or BESS subject matter expert
- Continue temperature monitoring to ensure mitigation or overheating condition

## 4.7 Battery Energy Storage System Fire Response

Response to electrochemical BESS related fires should include the following steps:

- System isolation and shut down
- Hazard confinement and exposure protection
- Fire suppression
- Ventilation

### 4.7.1 Understanding Thermal Runaway Conditions

Fires in electrochemical energy storage systems are often a result of thermal runaway, whereby the batteries create heat that cannot be dissipated, resulting in dynamic temperature increase. Fire responders should be prepared for toxic and potentially explosive gas release

### 4.7.2 Battery Energy Storage System Suppression Agents

For Li-ion battery fires, water is the preferred suppression agent due to its immediate cooling capacity, availability, and ease of onsite storage and transport. Firefighting foams are not considered to be effective because they lack the ability to cool and can conduct electricity. Foams may also contribute to thermal runaway issues by insulating the burning materials and exacerbating heat rise. Dry chemical powders used in firefighting may extinguish visible flame but, similar to foams, do not provide cooling to heated battery equipment. Thermal runaway inside the battery may continue potentially causing reignition.

### 4.7.3 Air Monitoring

Battery fires generally resemble plastic fires in terms of emission of toxic gases including CO, HCl, HF, HCN, Benzene, and Toluene. Li-ion battery fires will have short peaks of toxicity as individual cells randomly fail. However, battery fires, even once extinguished, continue to emit CO as long as the batteries remain hot.

Air monitoring during and after a BESS related emergency incident should be a priority for first responders. The BESS will contain a manufacturers air-monitoring system; however, it is recommended that fire responders use gas detection equipment to determine the presence and/or levels of toxic gases. Continued monitoring of CO from BESS fires, especially in enclosed spaces, and the continued use of personal protective equipment, including self-contained breathing apparatus, until CO levels are shown to be at normal levels. These practices may include monitoring for HCl, if applicable or possible.

## 4.8 Initial Fire Response

### 4.8.1 Small Fires

Small fires that are in the early stage and can be controlled with a fire extinguisher. An example would be a small trash can fire. In the event of a small fire at the project:

The person discovering the fire should immediately call the onsite supervisor, call 9-1-1 and notify the appropriate personnel.

All non-essential personnel should be removed from the hazard area.

Fire extinguishment with a fire extinguisher or other means should be attempted if the person has been trained in the use of fire extinguishers and it is safe to do so without placing themselves in danger.

Evacuate to the muster point or designated meeting area.

All work in the area should cease immediately, take steps to safely shut down equipment, exit the evacuation area, and report to the muster point or designated meeting area.

No employees are permitted to re-enter the site until the incident commander deems it safe and will issue an "All Clear" when it is safe to do so.

### 4.8.2 Large Fires

In the event of a large stage fire at the project:

- The person discovering the fire should immediately contact the onsite supervisor and call 9-1-1 to report the fire. Onsite personnel should not attempt to fight large fires.
- All personnel should be removed from the immediate danger area in anticipation of an evacuation.

- The Onsite Primary Contact will respond to the scene and ensure that the fire department has been dispatched. They will then determine evacuation needs, recruit/dispatch employees to assist with the evacuation and issue the following statement over the radio: "Attention, there is a fire emergency at (location name). Please evacuate (the affected area) and report to (designated meeting area).
- At this point, all employees in the affected area will stop work immediately, take steps to safely shut down equipment, exit the evacuation area, and report to the designated meeting area.
- In this scenario, fire extinguishers are to be used for escape purposes only.
- The Onsite Primary Contact will take the necessary steps to ensure that no employee re-enters the evacuated area until the Fire Department arrives and assumes command.
- No employee is required or permitted to place themselves in harm's way in order to facilitate extinguishment, evacuation, or rescue. All rescue operations will be performed by trained professionals upon their arrival.
- The Onsite Primary contact will provide notification to arriving Emergency Services that all employees are present and/or accounted for.
- The Onsite Primary Contact will issue an "All Clear" only when the Fire Department informs them that it is safe to do so.

### 4.8.3 Grass / Wildland Fire Procedures

The site should be free of combustible vegetation with only a ground cover of maintained vegetation adjacent and beneath the solar racking. Flying embers from off-site fire may inundate the area during fire events. The modified fuel areas and project features will resist ignition from ember showers. Ignition of the ground cover could result in a fast moving, but lower intensity fire that burn in a patchy manner on the site beneath the modules. This type of fire would be relatively short-duration as vegetative fuels are consumed rapidly. There would not be a sustained source of heat and or flame as there would be with surrounding wildfires. In the event of a vegetation fire under or near the modules or inverters:

DO NOT attempt to extinguish the flames with water or other chemicals as an electric shock or arc could occur.
If possible, safely attempt to shut down power at the inverter using the emergency shut off push button.
Let the fire burn vegetation and self-extinguish.
If flames continue away from modules or inverters, attempt to extinguish flames.

# 5 Controlling Hazards & Prevention Practices

Identification and elimination of conditions that may cause fires is the best method for eliminating injury, loss of life, or loss of property due to fires. Fire prevention at the Project will be promoted by:

Educating employees about risks and how to maintain a safe environment
Identification of risk factors (ignitions sources, fuel sources)
Proper storage procedures
Housekeeping and site maintenance to eliminate fuel sources and identify fire risks.

All employees, contractors and sub-contractors need to be educated on fire hazards and what procedures to follow to prevent and control fire hazards. Employees need to know how to respond to the fires those hazards might cause.

## 5.1 Welding and Open Flame / Hot Work

Cutting, welding, and open flame work are naturally hazardous. Welding processes may use oxyacetylene gas, electrical current, electron beams, and heat from fuel gas. It is critical that the highest level of attention be given to these activities to prevent fires at a PV power plant.

- Cutting and welding are to be done by authorized personnel
  Welders are to wear eye protection and protective clothing as appropriate
- Oxygen-fuel gas systems are to be equipped with listed and or approved backflow valves and pressure-relief devices
- Establish a fire watch when required
- Maintain an on-site water source, such as a water truck or tank

It is important to note that Weld County has experienced dry conditions over a period of several seasons creating extreme fire hazards due to fine fuel moisture content and high fire rate of spread.

## 5.2 Class “A” Combustibles

These combustibles consist of common materials (wood, paper, cloth, rubber, and plastic) that can act as fuel and are found on most work sites.

To handle Class A combustibles safely to prevent fires:

- Dispose of waste daily (i.e. cardboard, wood pallets, packing materials etc.)
- Use trash receptacles with covers
- Keep work areas clean and free of combustible materials
- Store materials in the proper storage containers
- Do a periodic check of the job site to make sure combustibles are being handled correctly Water and multi-purpose dry chemical (ABC) are approved fire extinguishing agents for Class A Combustibles.

## 5.3 Class “B” Combustibles

These combustibles include flammable and combustible liquids (oil, grease, tar, oil-based paints and lacquers) flammable gases, and flammable aerosols.

To handle Class B combustibles safely to prevent fires:

- Use only approved pumps (with suction from the top) to dispense liquids from tanks, drums, barrels, or similar containers (or use approved self-closing valves or faucets)
- Do not dispense Class B flammable liquids into a container unless the nozzle and container are electrically interconnected by contact or bonding wire. Either the tank or container must be grounded.

- Store, handle, and use Class B combustibles only in approved locations where vapors are prevented from reaching ignition sources such as heating or electric equipment, open flames, or mechanical or electric sparks
- Do not use a flammable liquid as a cleaning agent inside a building (the only exception is in a closed machine approved for cleaning with flammable liquids)
- Do not use, handle, or store Class B combustibles near exits, stairs, or any other areas normally used as exits
- Do not weld, cut, grind, or use unsafe electrical appliances or equipment near Class B combustibles
- Do not generate heat, allow an open flame, or smoke near Class B combustibles
- Know the location of and how to use the nearest portable fire extinguisher rated for Class B fire

## 5.4 Class "C" Combustibles

Class C fires are fires that involve energized electrical equipment. In the event of a Class C fire, ALWAYS de-energize the circuit(s) supplying the fire, and then use a non-conductive extinguishing agent such as carbon dioxide. A multi-purpose dry chemical (ABC) extinguisher can also be used on Class C fires. Do not use water, foam or other electrically conducive agents when fighting electrical fires. Once the electricity is shut down to the equipment involved, the fire generally becomes a standard combustible fire.

# 6 Employee Training & Education

Personnel shall be trained in the practices of the fire safety plan relevant to their duties. Construction and maintenance personnel shall be trained and equipped to extinguish small fires to prevent them from growing into more serious threats.

All employees will have to confirm that they understand the function and elements of the fire safety plan, including types of potential emergencies, reporting procedures, evacuation plans, and shutdown procedures. Review any special hazards that might occur at the site, such as flammable materials, fuel storage, toxic chemicals, and water reactive substances. Fire safety training should occur during the site safety training. Every employee must take this training before starting work. Training to include:

- Employee roles and responsibilities
- Recognition of potential fire hazards
- Alarm system and evacuation routes
- Location and operation of manually operated equipment (fire extinguishers)
- Emergency response procedures
- Emergency shutdown procedures
- Good fire-prevention housekeeping practices and equipment maintenance

The project's site safety person as well as the Onsite Primary Contact are responsible for fire safety training.

## 6.1 Use of Portable Fire Extinguishers

- A minimum of one portable fire extinguisher should be provided within 65 meters of anywhere in the work area during construction or heavy maintenance
- Fire extinguishers should be inspected monthly
- Fire extinguishers should not be obstructed and should be in conspicuous locations

## 6.2 Site Maintenance & Housekeeping

- Combustible material should not be stored in mechanical rooms or electrical equipment rooms
- Storage is not allowed in electrical equipment rooms, or near electrical panels
- Electrical panel openings must be covered
- Power bars must be plugged directly into an outlet and should be for temporary use only
- Extension cords and flexible cords should not be substituted for permanent wiring

# 7 Equipment Fire Safety

- All internal combustion engines, both stationary and mobile, shall be equipped with spark arresters. Spark arresters shall be in good working order
- Light trucks and cars with factory-installed (type) mufflers shall be used only on roads where the roadway is cleared of vegetation. These vehicle types shall maintain their factory-installed (type) mufflers and catalytic converter shields in good condition
- Equipment parking areas and small stationary engine sites shall be cleared of all extraneous flammable materials
- The project proponent shall make an effort to restrict the use of chainsaws, chippers, vegetation masticators, grinders, drill rigs, tractors, torches, and explosives to periods outside of the official fire season. When the above tools are used, water tanks equipped with hoses, fire rakes, and axes shall be easily accessible to personnel.
- Hot work permit. Activities using open flame heat sources shall be controlled and managed via an approved hot work permit process. A fire watch shall be maintained for one hour after activities that require a hot work permit cease.

# 8 Emergency Response

Project personnel will meet with local emergency response groups to review the Fire Safety Plan, discuss the type of work taking place, duration of project schedule and emergency procedures. The following course of action should be taken if an emergency situation develops:

- Evacuation procedures and assembly are contained in the Evacuation plan, which will be posted in all office trailers. Maintain site security and control.
- Notify proper emergency services for assistance. Call 9-1-1. Emergency numbers should be posted throughout the site.
- Notify all personnel on site through use of radio or other communication devices.
- Once emergency personnel have been notified, an employee will then be designated to meet the emergency personnel at the designated gate entrance and then guide them to incident location.

# 9 Document Amendment and Distribution

This ERP will be reviewed:

- Annually.
- When there is a change of method and/or technology that may require this document to be reviewed and updated.
- Following an emergency drill, response, or significant event to which the ERP is relevant

All revisions will be documented in *Table 5. Revision Status*.

*Table 5. ERP Revision Status*

| Revision | Revision Date | Issued Date | Reason for Modification |
|---|---|---|---|
| **0** | 2023-10-13 | | Initial Draft |
| **1** | | | |
| **2** | | | |

# 10 Fire Incident Reporting

A fire report should be completed for all fires that occur on or in the vicinity of the site, including all small fires and ignitions, prescribed ecological burn fires and wildfires. If the incident is managed by Weld County Emergency Services, the fire reports from that agency / fire station will be obtained, reviewed and kept on record for monitoring and reporting purposes for the Project.

Fire reporting should include details of the following:

- Fire name, ID and location
- The person / agency responsible for responding to the fire
- The command and control arrangements / incident team
- A fire map, including a hand sketch or GIS map of the fire perimeter. Fire mapping should include known or suspected ignition point/s, fire perimeter, fire paths, asset damage, islands of unburnt areas, fire control lines, and other information specific to the fire
- Fire management/control measures and strategies. This may include a list of equipment, personnel, vehicles utilised and their role (including agencies/equipment/personnel).
- Any unintended fire impacts to ecological values or other assets
- Follow up action and additional reporting requirements, such as near-miss or injury, effectiveness of the burn, post-fire assessment requirements

The annual monitoring for the Project will include a summary of all ecological burns and fire incidents. The fire reports and outcome will also be used to inform an adaptive management approach (e.g. improvements in fire mitigation procedures and/or response procedures) and incorporated as part of the document amendment procedure (refer to Section 9).