



Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215
Office: 614.227.2300
Fax: 614.227.2390

Sommer L. Sheely
Direct Dial: 614.227.8870
ssheely@bricker.com
www.bricker.com
info@bricker.com

September 29, 2022

Via Electronic Filing

Ms. Tanowa Troupe
Administration/Docketing
Ohio Power Siting Board
180 East Broad Street, 11th Floor
Columbus, Ohio 43215-3793

Re: Scioto Farms Solar Project, LLC, Case No. 21-0868-EL-BGN

Dear Ms. Troupe:

On December 13, 2021, Scioto Farms Solar Project, LLC (“Scioto Farms”) filed an application for a Certificate of Environmental Compatibility and Public Need to develop, construct, an up to 110 megawatt solar-powered electric generating facility in Wayne Township, Pickaway County, Ohio.

Attached for filing in the above-referenced case is a copy of the response from Scioto Farms to a public comment filed to the docket by the Pickaway County Fire Chiefs Association on May 24, 2022. The Scioto Farms team provided these responses and met with the Fire Chiefs prior to this filing.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Sommer L. Sheely

Attachment

Cc: Thomas Crawford (w/Attachment)

SCIOTO FARMS SOLAR COMMENTS

(in red)

September 20, 2022

PICKAWAY COUNTY FIRE CHIEF'S ASSOCIATION

May 2, 2022

TO: Pickaway County Commissioners

FROM: Chief Harold DeSanto, President
Chief Brian Thompson, Vice President
Chief Neil Cline, Secretary

Conditional Opposition to New Solar Energy Farm Development within Pickaway County

The Pickaway County Fire Chiefs Association is strongly opposed to all current and proposed solar energy farm development within the county. Our opposition is based upon but not limited to the following areas of concern:

- Increased fire hazard to responding personnel
 - o Traditional fires in an electrically energized environment
 - o Non-traditional fires of electrically energized equipment
 - o Co-existing traditional and non-traditional fires
 - o Lithium-ion batteries within the environment

Response: Photovoltaic (PV) systems are energized electrical equipment like other equipment that may be present at commercial or industrial sites in Pickaway County. Scioto Farms Solar does not recommend aggressively attacking the fire for suppression. Instead, the Incident should be managed by controlling the vegetation and stopping the fire spread. If substation components are impacted they will be treated as standard procedures and policies for substations in the jurisdiction.

As provided in the project's OPSB Certificate of Conditions (#11), an emergency response plan will be prepared that includes and addresses, but is not limited to, the following: scope of the plan, communication and training, roles and responsibilities, medical emergencies, fire/explosion, confined space incidents, falls and high angle emergencies, weather related events or conditions, security incidents, and quantities and type of any specialized firefighting equipment necessary. Emergency contact information for all Construction and Operations staff will be included and the plan will be provided to Pickaway County Emergency Management Agency, Pickaway County Fire Chief's Association and the Ohio Siting Power Board at least 30 days prior to the pre-construction meeting.

Prior to construction, the Scioto Farms Solar will develop and implement a project specific Emergency Response Plan (ERP) for its construction and maintenance employees and contractors. The ERP will be developed in consultation and coordination with potentially affected local and regional emergency response personnel. The Applicant would also include

training for local responders to support a prompt response to emergencies at the solar facility.

The facilities and equipment proposed for the Project are rated to withstand the life of the Project and the Engineer of Record reviews all vendor submittals to verify products comply with design drawings. The Project is designed with interior access roads capable of providing access throughout the site for emergency personnel. During operation, the Project facilities will be continuously remotely monitored for electrical faults/system errors.

The Project does NOT include a battery energy storage component so no lithium-ion batteries are proposed for use on-site.

Availability of fire suppression for non-traditional electrically energized equipment

- o F-500 Chemical agent- amount needed for a solar farm and increase in costs
- o Other chemicals needed
- o Additional costs of fire-fighter protective equipment
- o Need for heavy equipment and vehicles specific to solar farms

Response: Emergency personnel should follow their normal tactics and strategies at fires involving PV systems but do so with awareness and understanding of possible exposure to energized electrical equipment. Emergency personnel should wear traditional Personal Protection Equipment (PPE) as well as self-contained breathing apparatus (SCBA) if the PV modules themselves are on fire. Specialized chemicals are not recommended in fire operations for a photovoltaic system. Additionally, traditional fire personal protective equipment, including a self-contained breathing apparatus, shall be worn, and no additional fire-fighter protective clothing would be needed. The design of the arrays will provide access roads that will accommodate the size and weight of the fire apparatus.

- Increased presence of hazardous materials
 - o Heavy metals leaching into waterways from unserviceable panels
 - o Inhalation hazards associated with electrical fires

Response: The Project's facilities are made of materials that are not known to adversely impact water quality. Solar panels are largely made of glass and an aluminum frame, along with other commonly used plastic and metal wires. Further, photovoltaic cells on solar panels that are used to capture sunlight are made of silicon, which is a naturally occurring element. As stated in the OPSB Application, Scioto Farms Solar will only utilize Tier 1 equipment suppliers and expects solar panels to pass the U.S. Environmental Protection Agency's (USEPA) Toxicity Characteristic Leaching Procedure (TCLP) testing to verify they are not hazardous to people or the environment. To pass the TCLP test, a solar panel, when broken into pieces, must not leach harmful amounts of any hazardous materials at levels defined by the USEPA to verify it is safe for people and the environment. Solar panels that pass the TCLP and used for the Project are therefore considered non-hazardous under federal law and broken panels could be disposed of in municipal solid waste landfills just like household garbage. Passing the USEPA TCLP test means that the components and quantities of materials in the components are safe for the environment.

In the unlikely event that a panel is broken or unserviceable, the panel will be removed or replaced as soon as practicable.

The Scioto Farms Solar ERP will address inhalation hazards and proper PPE that are recommended should an electrical fire occur.

Lack of effective regulation relating to safe operation

- o Emergency vehicle access to critical infrastructure
- o Emergency disconnect switches for first responders
- o Panel density preventing emergency operations within solar field
- o Lack of on-site monitoring personnel

Response: Scioto Farms Solar is committed to reliable and safe operation of its facilities and will work in close coordination with Pickaway County as it develops emergency plans for construction and operation. In addition to verifying that the layout of the farm allows access to the facilities in the case of emergency, Scioto Farms Solar will review monitoring and emergency disconnect procedures.

The Scioto Farms Solar facility will be monitored remotely 24/7, eliminating the need for on-site monitoring personnel. A Subject Matter Expert (SME) shall be notified if there is an incident at the site and will work with First Responders for a safe shut-down and/or isolation of the facility. Access roads throughout the facility will accommodate the size and weight of all emergency vehicle apparatus. The Emergency Response Plan (ERP) and training will address managing the incident through tactics that will include access roads and the reach of hose streams.

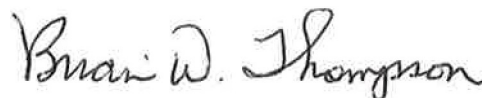
Pickaway County is a largely rural and agricultural community. Solar energy farm emergencies are significantly beyond normal operations and exceed our current capacity to respond. As such, these new hazards represent a significant threat to the community. Absent efforts to effectively regulate development and increase the capacity of first responders, the Pickaway County Fire Chiefs Association is strongly opposed to current and new solar energy farm development.

Respectfully Submitted:

Chief Harold DeSanto, President

A handwritten signature in blue ink, appearing to read "Harold DeSanto", written in a cursive style.

Chief Brian Thompson, Vice President

A handwritten signature in blue ink, appearing to read "Brian W. Thompson", written in a cursive style.

Chief Neil Cline, Secretary

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

9/29/2022 8:49:52 AM

in

Case No(s). 21-0868-EL-BGN

Summary: Notice of Response to Public Comment by the Pickaway County Fire
Chiefs Association electronically filed by Teresa Orahood on behalf of Sommer
Sheely