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02/01/2024

Holliston Planning Board 703 Washington Street Holliston, MA 01746

Subject: 600 Central St Proposed BESS Project - Additional Information and Responses

Dear Members of the Planning Board:

BlueWave would like to submit the following response letter and associated information to address the final, identified outstanding items discussed during the last public hearing for the 600 Central Street proposed project.

#1: Sound Analysis Peer Review

BlueWave previously submitted a sound analysis conducted by Epsilon Associates assessing predevelopment and post-development noise conditions at 600 Central Street and nearby sensitive receptors. The Board requested a peer review to be conducted for the analysis, to which BlueWave agreed. The Town engaged with Christopher Menge of HMMH, who submitted a peer review of the sound analysis dated October 25th, 2023.

The conclusion of HMMH's report confirms the analysis results presented in Epsilon's assessment, that MassDEP and the Town of Holliston noise limits will not be exceeded, and that the noise generated by the system will not be considered intrusive or detrimental to the existing character of the nearby neighborhood. BlueWave agrees that a condition of approval would require the mitigation identified in the report be implemented, and that if any changes in equipment and subsequent mitigation requirements are made that a new noise assessment be conducted to confirm continued compliance with noise policies.



Since HMMH's submission of their peer review to the Town, BlueWave has not received any comments from the Board or members of the public in regard to its content or conclusions. Therefore, BlueWave considers this item sufficiently addressed.

#2: New York State Investigation Results into Summer of 2023 BESS Fires

At previous hearings, members of the public raised concerns regarding a series of battery energy storage system fires that occurred in New York state over the summer of 2023. After the occurrence of the fires, New York state created a working group to conduct assessments of any environmental or health impacts the fires may have had, as well as to review fire codes and generate recommendations for improvements to code and best standards and practices.

On December 21st, 2023, New York State announced the initial findings from the working group's investigations. There were confirmed to be "no reported injuries" and analyses found that "no harmful levels of toxins detected at sites of battery storage fires". Analysis involved surface sampling of nearby buildings, on and off-site soil sampling, and private well testing for nearby residents. Furthermore, the group found that there is "there is no evidence of significant off-site migration of contaminants associated with the fires."

The analyses associated with the findings are also publicly available upon request to the State. The press release associated with the initial findings can be found at the following link:

https://www.governor.ny.gov/news/governor-hochul-announces-release-initial-findings-inter-agency-fire-safety-working-group

Overall, BlueWave believes that the findings of the state investigation confirm previous statements made over the course of the 600 Central Street public hearing process: that in the event of a battery energy storage fire, the technology, when developed with correct emergency response procedures and appropriate first-responder training, does not present a hazard or risk to public or environmental safety or welfare.

#3: NFPA 855 Hazard Mitigation Analysis

BlueWave also submits alongside this response letter a hazard mitigation analysis provided by AESI, conducted in compliance with NFPA 855 code requirements for stationary battery energy storage systems. This analysis demonstrates how the proposed system appropriately mitigates the potential failure scenarios and hazards identified in NFPA 855 and is representative of the safety of the system in the field.

BLUEWAVE

BlueWave looks forward to discussing these responses and additional materials provided in greater detail at the February 8th hearing. It is of BlueWave's opinion that this information, alongside the extensive list of proposed conditions provided in our response letter dated September 21st, 2023 and other materials submitted to date, provide the basis for an approval with conditions that will result in a safe, non-intrusive project that stands to benefit the Town of Holliston and its residents.

Sincerely,

<u>Josh Lariscy</u>

Joshua Lariscy – Director of Energy Storage Development