ZBA "Asks" – 48 Schoosett St BESS (Updated as of Today)

1. Require a Determination on Use Before Anything Else

- **Confirm that a stand-alone BESS is *not* a permitted use** in RA or BB.
- If the developer claims "accessory use," **require a Special Permit** with proper findings under §VI.D.
- Until that determination is made, the Planning Board approval **cannot stand**.

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2. Require Complete Safety Documentation *Before* Any Permit or Approval

Now that the make/model/chemistry is known, the ZBA must require:

A. UL 9540 & UL 9540A Full-Scale Test Reports

- Actual certificates, not summaries
- Unit-level and installation-level test data
- Propagation risk
- Gas release (HF, CO)
- Heat release rate (HRR)

B. A Site-Specific Hazard Mitigation Analysis (HMA)

The Palmer document is generic. ZBA should require a true, engineering-based HMA that includes:

- Quantitative hazard calculations using the actual 9540A test results
- Container-to-container propagation analysis
- Gas detection + automatic exhaust/venting design
- Deflagration risk control (McMicken lessons)
- Isolation and shutdown protocol
- Safe firefighter entry procedure
- Updated distances to buildings, parking areas, and abutters

C. A Complete NFPA 855 / 527 CMR Code Compliance Narrative

Not a checklist — a full code path explaining:

- Required clearances
- Ventilation design
- Fire department access
- Hydrant distance deficiency
- Overcurrent protection, grounding, and isolation

- Required placards and signage
- Vent/exhaust hazard direction

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3. Require Full Toxic Gas Plume Modeling

Now that chemistry is disclosed, the ZBA should require modeling for:

- HF and CO plume distances
- Evacuation vs. shelter-in-place decisions
- Impacts on **South Shore Therapies** (medically sensitive clients)
- Impacts during full parking lot events (Friday bingo)
- Downwind impacts to wetlands/North River

This is standard for other MA communities permitting BESS.

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4. Require a Fire Water / Runoff Containment Plan

Stormwater construction plans do not address fire runoff.
Require:

- Worst-case thermal event runoff volume
- HF-contaminated water containment
- Overflow analysis
- Protection of wetlands
- Required post-incident sampling & cleanup

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5. Require a Complete Emergency Response Plan (ERP) – Signed by Pembroke Fire

Before any approval, require:

- Zone maps (hot/warm/cold zones)
- Entry protocol (don't-open-door guidance)
- Evacuation & traffic management plan
- Parking-lot control plan
- Alarm/notification procedures
- Annual drills and training plan
- Contact hierarchy

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6. Require a Third-Party Fire Protection Engineer Peer Review

Because:

- The Palmer HMA and code analysis are not site-specific
- NFPA 855 permits and many towns require independent review
- PFD has neither the time nor capacity to engineer a solution internally

Make completion of peer review a **condition precedent** before any action.

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7. Require a Noise Impact Study

Palmer provided no noise information.

ZBA should require a third-party analysis of:

- HVAC and inverter/transformer noise
- Tonal noise penalties (MA DEP)
- Nighttime sound levels
- Sensitive receptors, especially **South Shore Therapies**
- Mitigation plan (walls, setbacks, shielding)

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8. Require Parking and Access Mitigation for Knights of Columbus Events

ZBA should require:

- Fire lane protection during events
- Traffic/parking management plan
- Secondary access route or fire lane widening
- Prohibition of vehicle obstruction at all times
- Event coordination with the Fire Department

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9. Require Environmental Protection Conditions

Specifically:

- Wetlands & groundwater protection during fire events
- Soil/groundwater sampling after any incident
- Annual reporting of system inspections & BMS logs
- No discharge to basin during fire (unless designed for it)

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10. Require Robust Financial Assurance

Not just “surety for removal.” Require:

- A decommissioning bond covering full removal + cleanup
- Environmental remediation coverage
- Annual inflation escalation
- Insurance naming the Town as additional insured

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11. Require All Missing Documents Before Any Further ZBA Action

ZBA should state explicitly that:

Incomplete submissions will not be deemed “complete applications,” and the ZBA will not proceed until all safety, environmental, and emergency documentation is delivered and peer-reviewed.

This is standard practice for high-risk facilities.