

10/26/2025

Subject: Urgent request for review of the Beach Haven Battery Energy Storage System

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Dear Congressman Van Drew, Senator Amato, Assemblyman Rumpf, Assemblyman Myhre, President Guhl-Sadovy, Sheriff Mastronardy, Administrator Zeldin, Mr. Martucci, Mr. LaTourette, and Mr. Anthony,

We are writing you once again over deep concerns regarding the Battery Energy Storage System (BESS) in Beach Haven, NJ, and to share troubling information about the safety record of similar facilities.

As you know, Lithium-ion batteries in these BESS installations can fail catastrophically, triggering self-sustaining thermal runaway events (TREs). TREs are cascading chain reactions that result in extremely intense fires which cannot be extinguished with water. According to the Community Right-to-Know disclosure, this facility contains an estimated 10,000-24,999 pounds of lithium-ion batteries, and is located in the center of Beach Haven with no appreciable setback from adjacent homes and businesses. Current fire service guidance instructs departments to allow these battery fires to burn themselves out, a process that can take days and even weeks, while crews use water streams to cool exposures. During the October 1, 2025 BESS fire in Peoria, Arizona, three ladder truck master streams flowed an estimated 3000 plus gallons of water per minute, an incapacitating volume for our local water system.

Additionally, enormous volumes of toxic and explosive gases are released during a TRE, along with heavy metal nanoparticles and other contaminants. The aftermath ensues stranded energy, reignition, and a protracted EPA directed hazardous waste cleanup with environmental monitoring.

Given that this site lacks a containment basin and lies directly over key aquifers, adjacent to the environmentally sensitive Barnegat Bay, and within an extremely densely populated and popular summer destination, the potential consequences for public health, safety, and the

environment are severe. Bess facilities are now more appropriately located in remote areas where such events reduce the impact on public safety and the environment.

When our concerns were previously referred to the BPU, the response focused solely on the “safety features and measures” described by Atlantic City Electric (ACE), and citing a declining failure rate for these facilities. Unfortunately, this offers little reassurance in light of the recent data:

- Since the Beach Haven BESS was approved in April 2022, there have been 10 thermal runaway events at other BESS facilities in the US.
- The three most recent incidents occurred in the past two months, Parkfield, CA (8/30/25), Boulder City, NV (9/23/25), and Peoria, AZ (10/1/25).
- According to the EPRI May 2024 White Paper on BESS Failures, 72% of BESS failures (where system age was known) occurred during construction, commissioning, or within the first two years of operation.
- Even more concerning, only 36% of failures (2018-2023) had an identifiable root cause.
- Identified causes included electrical faults (short circuits, overcharging) manufacturing defects, poor design, assembly errors, improper installation, and inadequate temperature/humidity control, as well as lightning strike and coolant leak.

In April, 2022, ACE failed to disclose to the land use board any of the inherent hazards of lithium-ion batteries including a worst case scenario, a TRE. Additionally, ACE has failed to answer more than 60 of our submitted questions, including the last 20 on the following page of this letter. Beach Haven Mayor Colleen Lambert has clearly stated that the risks of this project far outweigh any potential benefits, and has called for its removal.

In light of this mounting evidence, we urge you to revisit and fully investigate the approval and placement of this Beach Haven BESS. This project presents a dangerous and irresponsible risk to our residents, visitors, environment, wildlife, and drinking water supply.

Thank you for your attention into this urgent matter, and your continued commitment to the safety and well-being of our communities.

Regards,

Robert Jacobson Beach Haven Resident  
Jim Ciulla Beach Haven Resident  
Matt Gideon Long Beach Township Resident  
Harry Befumo Long Beach Township Resident

Additional 20 questions for ACE submitted 10/20/25

10 Questions remain unanswered sent to ShayLa Salter on 2/24/25, resent to [BHBatteryStorage@exeloncorp.com](mailto:BHBatteryStorage@exeloncorp.com) on 7/22/25

30 Questions remain unanswered given to ACE in person on 3/18/25, resent to [BHBatteryStorage@exeloncorp.com](mailto:BHBatteryStorage@exeloncorp.com) on 7/23/25

1. There have been 10 thermal runaway events (TRE) at Battery Energy Storage System (BESS) facilities since April 2022, the month the Atlantic City Electric (ACE) BESS application was heard and approved by the Beach Haven Land Use Board. The most recent 3 failures occurred within the past 2 months; Parkfield, CA on 8/30/25, Boulder City, NV on 9/23/25, and Peoria, AZ on 10/1/25. A shocking statistic from EPRI's May 2024 White Paper Analysis of BESS Failures is 72% of BESS failures when system age is known, happen during construction, commissioning, or within the first 2 years of operation. Additionally, only 36% of the failures from 2018 to 2023 had an identifiable root cause. Failures that we were identified were due to electrical issues like short circuits, overcharging, manufacturing defects, physical damage, poor design, installation, assembly, construction, integration, and inadequate environmental management such as temperature and humidity control, even a lightning strike and a coolant leak. Has ACE investigated these failures and made any changes or improvements to increase safety? Has any of the suppliers/manufacturers for the componentry of this BESS experienced a previous failure which has, or could have, resulted in a TRE? Who designed and assembled this BESS, how many of this type are in use, and have there been any failures? How experienced are the ACE operators of this BESS?

2. According to the community Right to Know disclosures there are between 10,000 and 24,999 pounds of Lithium-ion batteries at the BESS. While this is a very wide range, what is the actual number of pounds of Lithium-ion batteries at this facility?

3. Did ACE consider using lithium iron phosphate (LFP) batteries which many experts consider more stable and safer for a BESS?

4. Did ACE do plume modeling with different wind and weather conditions? Which modeling techniques were used? Was this done for the emergency response plan and

risk assessment? How many people are estimated to be at risk for exposure to toxic fumes from a TRE in the worst case scenario with stable atmospheric conditions on a holiday weekend in the summer? What are the exposure risks for the emergency responders?

5. What would be the size and boundaries for the evacuation and isolation zones for an incident at the BESS given plume modeling results? The EPA suggests an isolation zone of at least 330 feet in all directions to start for a commercial BESS, while the US Department of Transportation stipulates a 1/3 of a mile isolation evacuation zone for a burning railcar or trailer of Lithium-Ion batteries, and those batteries are only charged to 30% or less.

6. The BESS is located over the Atlantic City 800 foot and the Kirkwood-Cohansey Aquifers and adjacent to the environmentally sensitive Barnegat Bay. What measures are implemented to protect the drinking water supply and the wildlife habitats of Barnegat Bay from contaminants from a TRE?

7. Beach Haven is seashore location with corrosive salt mist, high winds and humidity, and is prone to flooding from salt water. All these factors can reduce equipment life and/or create failures e.g. HVAC systems, electrical connections, fasteners, short circuits etc. What changes were made to this BESS to take into account this challenging coastal environment?

8. What are the 3 metal boxes added to the poles supporting the regulators? What do they do? What is their elevation and what happens if they become submerged in flood waters? With much of the Boulevard (Bay Ave) closed during this past weekend storm (Oct 11-13), how close did the flood waters come to these boxes, keeping in mind wakes from vehicles can increase the flood water level?

9. Did ACE take into account the possibility of a TRE during a flood event, and how would that affect the emergency response?

10. Could the flames from a TRE at the BESS take out the nearby overhead wires or regulators, and what would happen if that occurred?

11. Lithium-ion NMC batteries during a BESS TRE release toxic and explosive gases, nanoparticles, heavy metals, Lithium, Copper, Aluminum, Nickel, Magnesium, Cobalt, and VOC's, Per- and polyfluoroalkyl substances, etc. What is the composition of the batteries in the BH BESS, and what would be the likely contaminants released during a TRE? Have base levels of these likely contaminants been established, and if so, what contaminants were tested and where were samples taken?

12. Does ACE have BESS insurance that covers the town, residents, and businesses for health related issues, revenue losses, property devaluation, environmental remediation, cleanup of heavy metals and contaminants, etc.? Will you share the policy and coverage?

13. The National Fire Protection Association (NFPA), publishes a fact sheet outlining the advantages and hazards of a BESS e.g. a TRE, release of toxic flammable gases, stranded energy, and reignition of the batteries days or weeks later. Why did ACE omit the potential hazards of a BESS from the Beach Haven Land Use Board, and on the ACE Battery Fact and FAQ's sheets?

14. What is the permanent fix for power to the south end of the island? Is the BESS a temporary fix and will it be removed if a permanent fix is implemented such as an additional feeder line, and what is the timeline?

15. In light of the serious and increasing concerns of cyber or physical attacks on water and electric utilities, the BESS is considered a prime target with severe and catastrophic safety hazards. What is being done to prevent the BESS from being compromised or successfully targeted?

16. The severity of a TRE is a function of the state of charge of the batteries. Does ACE have a plan or procedure to immediately discharge the batteries if an incident occurred?

17. Knowing that there are no suppression systems that can stop a cascading TRE, standard practice for dealing with a TRE at a BESS is to use water to cool exposures, while allowing for the involved BESS batteries to burn themselves out, which can take days or longer. Therefore, BESS facilities are more appropriately being located in remote places where they create the least amount of disruption and damage. Wouldn't ACE agree, knowing what we know today, this represents an undeniably risky, dangerous, and irresponsible location for a BESS? Rationale: adjacent homes and businesses are too close, extremely high summertime population creates extraordinary health and safety risks, contamination risks to vulnerable drinking water supplies and environmentally sensitive habitats, the main evacuation route is within the isolation zone, summertime traffic with one way on and off could severely delay emergency response, and all of fire departments in the area are voluntary with limited resources for handling a TRE of this size.

18 There could be remarkable amounts of water used from firefighting activities to protect exposures if the BESS experiences a TRE. The recent BESS fire in Peoria, AZ which involved one battery container on 10/1/2025 shows 3 master streams from ladder trucks protecting exposures using an estimated 1500 to 3000 plus gallons per minute. These operations can go on for hours, even days with batteries reigniting after the TRE. What provisions has ACE made ensure adequate water supplies can be maintained? Could salt water from the Bay be an option? Have the local towns been made aware of the potential crippling strain to the water systems? This runoff water could become contaminated.

19. Is there a decommissioning plan?

20. Was an internal risk assessment performed, and did it include a TRE?

