



MANTENO COMMUNITY FIRE PROTECTION DISTRICT

July 13, 2026

Chris LaRoque
Village of Manteno
98 East Third Street
Manteno, Illinois 60950

Re: Fire Brigade Staffing Requirement – Gotion Illinois New Energy, LLC

Dear Chris LaRoque:

The Manteno Community Fire Protection District, acting as the Authority Having Jurisdiction (AHJ) for fire prevention and life-safety matters, has reviewed the current fire brigade staffing at the Gotion Illinois battery manufacturing facility and determined that the existing staffing arrangement is insufficient for the facility's hazard profile.

On July 9, 2026, District personnel evaluated the facility's fire brigade program and determined that Gotion currently maintains a roster of six (6) fire brigade members. At the time of the evaluation, staffing was reported as follows:

- Four (4) brigade members assigned to a twelve-hour day shift.
- Two (2) brigade members assigned to a twelve-hour night shift.

The District's review confirms that this arrangement does not provide six qualified fire brigade members on-site during each operational shift. Because the facility's hazards exist continuously, the required brigade staffing level must be maintained twenty-four (24) hours per day and cannot be limited to daytime production or a single shift.

Lithium phosphate battery manufacturing, charging, testing, storage, and related material handling present unique hazards, including thermal runaway, rapid fire spread, toxic gas generation, and rapidly escalating emergency conditions that require immediate on-site intervention by trained personnel.

Under **IFC §104.8**, the fire code official may require technical reports, engineering analyses, inspection reports, and related documentation to evaluate whether facility conditions, materials, processes, and operations provide adequate fire and life safety protection. Based on the facility's hazard profile and the District's prior findings, a

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continuously available and adequately staffed fire brigade is a required safeguard for this facility.

Further, **IFC Chapter 50** requires hazardous materials to be evaluated and controlled based on their quantity, hazards, storage, use, handling, and operational controls. The hazardous materials and lithium phosphate battery operations at the facility support enhanced on-site emergency response capability and brigade staffing commensurate with the facility's hazard profile.

This determination is consistent with the Village's July 9, 2026 correspondence to Gotion, which recognized that the approved Emergency Action Plan and related permit and occupancy approvals require six (6) basic-operation-trained fire brigade members per shift, including one qualified Incident Commander and one qualified Incident Safety Officer. The District's hazard-profile review provides the fire protection basis for maintaining that requirement as a continuous operational condition.

For clarity, the Village's July 9, 2026 correspondence requires Gotion to enter into a fire brigade agreement by **July 31, 2026** and to fully staff and operate the required brigade by **August 31, 2026**. Until that staffing is fully implemented and maintained on each operational shift, the District considers the facility's fire protection posture insufficient for the site's hazard profile. Continued noncompliance endangers Manteno residents, Gotion employees, and responding firefighters.

Accordingly, consistent with the Village's July 9, 2026 correspondence and the District's facility hazard-profile review, the District determines that the minimum required fire protection staffing level for the Gotion facility is:

A minimum of six (6) basic-operation-trained firefighters per shift, present and available on-site at all times, twenty-four (24) hours per day, seven (7) days per week, including one (1) firefighter qualified as an Incident Commander and one (1) firefighter qualified as an Incident Safety Officer.

This staffing level is required to maintain emergency response capability consistent with the hazards present at the facility.

The District requests that the Village continue to recognize and enforce this requirement as the minimum fire brigade staffing level for the facility and incorporate it



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into all applicable reviews, permits, agreements, inspections, compliance discussions, and enforcement actions involving Gotion Illinois New Energy, LLC.

Respectfully,

A handwritten signature in black ink, appearing to read "Richard Petersen".

Richard Petersen

Fire Chief

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