III-q | EMERGENCY RESPONSE PROCEDURES TECHNICAL SUMMARY

Stream Data Centers Emergency Response Protocols

Stream Data Centers is committed to ensuring the safety and well-being of its personnel, visitors, and surrounding communities through comprehensive emergency preparedness. Due to their robust design, 24/7 on-site expert staffing, and lack of waste-generating operations, Stream's data center facilities maintain an extremely low risk profile.

Our rigorous Emergency Response Protocols are a systematic approach that incorporates superior facility engineering, high maintenance standards, robust operator training, and pre-established procedures tailored for the unique operational environment of a data center.

Hazardous materials in modern data centers are strictly limited and handled with specialized care. They are typically confined to uninterruptible power supply (UPS) batteries, backup generator fuel, and common, low-volume office materials (e.g., cleaners). These materials are stored and handled via strict safety protocols, specialized storage, and continuous monitoring, ensuring they are not present in large quantities or in a form that poses a high inherent risk.

Uninterruptible Power Supplies (UPS) batteries within these facilities pose specific risks primarily related to electrical hazards, such as arc flash and shock. These hazards are mitigated through a rigorous manufacture-specific and Stream developed **Method of Procedure (MOP)** that mandates the use of specialized personal protective equipment (PPE)—specifically Category 2 arc flash clothing—and requires "dual-custody" verification for all critical switching evolutions.

To ensure continuous system integrity, Operations performs manufacturer-recommended **Quarterly Preventative Maintenance (QPM)** to monitor battery health and capacity, identifying potential electrical failures before they escalate. In the event of a thermal incident, these proactive maintenance protocols are backed by a **Site Emergency Action Plan (EAP)** specifically designed for fire suppression and containment in critical power environments.

Fuel Storage and Spill Preparedness in modern data centers are mainly focused on backup generators, where fuel is stored in self-contained manufacturer-designed double wall tanks which have regular inspections by 24/7 on-site technicians. Fuel spills are extremely rare due to these preventative measures, and on the rare occasion they occur, they are contained within engineered secondary containment barriers. For Project Double Reed, the risk is even lower given the limited number of generators, significantly reducing the volume of stored fuel compared to facilities of similar size. Further, the site will comply with both Federal SPCC (Spill Prevention, Control, and Countermeasure) standards and New York State Department of Environmental Conservation (NYSDEC) petroleum bulk storage requirements. Additionally, as per **6 NYCRR Part 613**, all petroleum storage tanks exceeding state-defined capacity thresholds (1,100 gallons) are registered with the NYSDEC. Compliance is maintained through mandatory monthly inspections by 24/7 on-site technicians and formal periodic integrity testing.

Secondary Containment and Environmental Protections

The secondary containment strategy utilizes both engineered physical barriers and temporary tactical measures:

- **Engineered Barriers:** Federal law requires that all bulk storage containers (such as the generator tanks and main storage) provide a secondary means of containment. The facility utilizes double-walled, manufacturer-designed tanks where the outer wall serves as the secondary barrier, capable of holding the entire capacity of the primary tank.

- **Tactical Environmental Protection:** During refueling operations, technicians are required to apply magnetic storm drain covers to all nearby drains. This creates an immediate, temporary seal that prevents any accidental surface spill from entering the local water system.
- **Point-of-Connection Containment:** The "Generator Refueling Method of Procedure" (MOP) mandates the use of **absorbent mats** under every hose connection point to catch drips and the deployment of a **spill kit** directly adjacent to the generator receiving fuel for immediate response.

Spill Preparedness and Mitigation Protocols

Stream maintains a state of constant readiness through specific procedural requirements defined in the site-specific MOP developed for each site:

- **Pre-Fueling Verification:** Technicians must establish a safety ground between the fueling equipment and the generator to prevent static ignition and verify fuel levels using manual measurements to prevent overfilling.
- **Active Monitoring:** Refueling is treated as a Critical Step, requiring technicians to monitor for leaks continuously. If a leak is discovered, the Back-Out Plan dictates the immediate cessation of the fueling process and the commencement of cleanup using petroleum-safe PPE and on-site kits.

Staff Training: All personnel involved are trained in the use of high-visibility safety equipment, fire extinguishers (Class B), and the specific location of emergency shut-off valves and spill response materials.
Fire Suppression Technology: Our facilities integrate advanced fire detection and suppression systems which do not utilize chemical foams or hazardous chemical agents. Instead, we rely on environmentally safer, non-chemical methods as the first line of defense, backed by water-based systems, to safeguard individuals and critical infrastructure. Fire detection and suppression in our facilities are controlled by:

> **Early Detection:** We utilize highly sensitive systems, such as Very Early Smoke Detection Apparatus (VESDA), which continuously sample the air for microscopic combustion particles. This provides warning of a potential incident well before visible smoke or heat are present, enabling operators to intervene.
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> **Non-Chemical Suppression (Primary):** The first line of defense is often a localized response (e.g., portable fire extinguishers, per **NFPA 10**) guided by our 24/7 on-site staff. We do not use chemical foams or gaseous agents that pose a respiratory or environmental hazard.
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> **Water-Based Suppression (Secondary):** If primary containment cannot be achieved, an automated suppression system (typically a pre-action sprinkler system) activates. This system is the safest water-based approach for critical IT environments.

System Integrity: All emergency systems are subject to stringent testing, comply with or exceed best practices, and are supported by redundant power supplies and backup generation. This includes, for example, monitoring of potential fire, equipment failure, or fuel spills—allowing for immediate, controlled responses.
Remote monitoring mechanisms across all critical infrastructure components automatically alert local emergency responders and/or SDC's security and operations teams, who maintain 24/7 on-site coverage to facilitate a prompt and coordinated response.

Rigorous Training: The organization upholds rigorous training standards and detailed accident response procedures. Employees are thoroughly trained in the use and location of all emergency equipment and protocols, including water and fuel shutoff valves as well as fire safety systems.

Operational Readiness: To maintain a high level of operational readiness, SDC conducts daily site inspections and routine emergency drills that replicate real-world conditions, evaluating both procedural effectiveness and employee preparedness.

Proven Safety: Our commitment to these safety measures is proven. SDC maintains a strong safety record, with an internal operational safety record showing an extremely low incident rate, well below industry averages for comparable mission-critical facilities.
With these rigorous training standards, continuous monitoring, and maintenance, data center facilities have an extremely low incident rate, supporting their classification as a low-risk environment.