



## association to protect AMHERST ISLAND

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June 19, 2013

The Honourable Jim Bradley  
Minister of the Environment  
11<sup>th</sup> Floor, Ferguson Block  
77 Wellesley Street West  
Toronto, ON M7A 2T5

Dear Minister Bradley:

I have not had a reply to my letter to you of May 13, 2013.

That letter shared with you an emerging issue that, if not checked, will affect not only my Community of Amherst Island, but also the entire Province. That issue arises from the Province's own REA process, which requires a developer proposing a wind-turbine installation to submit a 'Decommissioning' plan for the project at the end of its useful life. Algonquin Power's proposal to install 33-37, 50-storey tall industrial-scale wind turbines on Amherst Island illustrates the point.

Algonquin's 'Decommissioning' report purports to show 'plans' to take down the turbines at the end of the OPA contract (20 years). Section 5 of the STANTEC report (for Algonquin) entitled 'Managing Excess Materials and Waste' (Table 5) describes how turbine blades would be disposed.

**Table 5**

**Component**

**Mode of Disposal**

Turbine Blades

Cut up and dispose in 'regulated landfill'

Turbine blades typically contain epoxy resins made from Bisphenol A (BPA), a chemical composition known to harm health, particularly that of children. It is being banned in Ontario. In addition, turbine blades can also contain carbon fibres, a material with the same dangerous characteristics as asbestos. (A laboratory test of turbine material from the recent fire in Goderich showed that material could not be recycled.)

My questions in my May 13 letter were (and remain):

- (i) Where in Ontario are the 'regulated land-fills' Algonquin mentions?
- (ii) Where in Ontario are the 'regulated facilities' to cut up turbine blades?
- (iii) Is BPA allowed in Ontario landfills?

Our search so far suggests that no such facility exists in Ontario. Rotor blades or fins of industrial-scale wind turbines are not recyclable. Many Member States in the European Union (EU) have banned the practice of simply sending the blades to landfill, resulting in used turbine blades being stockpiled as developers have no choice as to what to do with them.

With 1200 turbines already up in Ontario and 6000-plus apparently planned, this problem is about to become an Ontario-wide problem and has not been addressed as a waste management issue.

We have one report of an Ontario Community where the developer has 'disposed of' used turbine parts in abandoned quarries. There is a rumour that something similar has happened on Wolfe Island. The European problem is beginning to appear here.

Amherst Island is especially vulnerable. This small island (7 kilometres at its widest point and 20 kilometres long.) is an 8 kilometre, 15-minute ferry crossing from the north shore of Lake Ontario. The Island is unique in its natural heritage and historical richness. There is no room for used turbine blades or parts on the island and getting them off is a major logistical problem.

On the subject of 'Decommissioning' the Amherst Island turbines, consider this:  
-Algonquin has proposed NO funds for this phase of the project and indeed has signaled that they may well sell the project before its completion.

-Loyalist Township Council, in a June 4th letter to the Honourable Bob Chiarelli, expresses concern that the costs of 'renewable energy' projects proposed for the Township, including the proposed Amherst island project, will exceed any future financial benefits, suggesting that the Township would be financially unable to participate in the removal of aged or failed turbines from the Island.

- 'Decommissioning' would require the same (perhaps higher) costs of equipment, labour, removal from the Island etc, than needed to install the turbines originally. The poor economics of salvage and disposal, along with the lack of recycle and landfill facilities in the Province, guarantees that aged turbines will be abandoned on Amherst Island and left for future generations to clean up.

In summary, two points:

(i) The province of Ontario appears virtually certain to experience an environmental disaster of enormous proportion as Ontario's plan for 6000-plus turbines, with no regulated landfill or recycle capability. The first of the turbines built, on Wolfe Island and in Western Ontario, are already nearing their half-life.

(ii) If Algonquin's proposal for Amherst Island is approved, the Community will become a toxic dump for unrecyclable turbine pieces, a dismal legacy for the children living on the Island to-day.

A ready solution for Amherst Island is available. Algonquin's proposal has not been approved. Their REA reports show a very wide range of deficiencies and significant omissions in all areas and should be rejected as falling well below Ministry expectations.

We suggest that the Ministry consider employing the well-established 'Precautionary Principle' and stop the proposed Amherst Island project.

Respectfully submitted,

Peter G.S. Large, P.Eng,  
President, APAI

cc:

- Mr. Randy Hillier, MPP, PC.
- Loyalist Township Council
- Mr. Eric Gillespie, LL.B.
- County of Lennox and Addington
- Hon. David Oraziatti, Minister of Natural Resources
- Mr. David O'Toole, Deputy Minister of Natural Resources
- Hon. Bob Chiarelli, Minister of Energy
- Mr. Serge Imbrogno, Deputy Minister of Energy
- Mr. Paul Evans, Deputy Minister Department of the Environment
- Hon. Deborah Matthews, Minister of Health
- Ms Jane Wilson, Wind Concerns Ontario
- Hon. Kathleen Wynne, Premier of Ontario