



association to protect AMHERST ISLAND

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July 26, 2013

Mr. Ian Robertson, CEO, Algonquin Power
2845 Bristol Circle
Oakville, Ontario L6H 7H7

Dear Mr. Robertson:

The Association to Protect Amherst Island (APAI) is a registered Association of 350 members, with the current principle objective of stopping the 33-37, 50 storey-tall, Industrial scale wind turbine development proposed by Algonquin for Amherst Island.

APAI has provided science and fact based critiques for STANTEC's reports required by the REA process. One of those reports deals with 'Decommissioning' of the proposed wind-turbine project at the end of its useful life.

STANTEC's report (Dec. 2012) states (in Table 5.1), The Mode of Disposal for Turbine Components. 'Recycle' is mentioned seven times; placing turbine sections in 'regulated landfills' is mentioned four times, 'salvage' gets two minor mentions.

We have earlier pointed out to Algonquin that there are no 'landfill' sites in Ontario regulated to take turbine blades or 'miscellaneous, non-recyclable materials'. We have asked the Minister in two separate letters where those sites might be found in Ontario and have had no reply.

However, Algonquin's reply to questions arising from the Municipal Consultation Form tells a different story, saying that Algonquin will cover the cost of 'decommissioning' by selling the parts for scrap.

While the steel in turbine blades may be salvageable, these are very large units, difficult to manufacture or transport and would be as costly to disassemble and remove from Amherst Island as they would be to bring and erect.

Removal of other elements of turbines is more problematic, e.g.:

(i) Switchgear systems require SF6 gas as a hydraulic coolant. Every lb. of this gas leaked is the equivalent of releasing 11,000 tons of CO2 into the atmosphere.

- (ii) Decommissioning on Amherst Island will require removal of buried power cables, high voltage equipment involving toxic chemicals for cooling and 'high mechanical-load machinery involving flammable liquids.
- (iii) Hundreds of litres of hydraulic fluids and rare-earth metals require skilled technicians and enormous cost.
- (iv) Removal of fibre optics data-lines requires proper disposal of glass strands, scraps of which are the same as glass splinters.

Algonquin's response to this question in the Municipal Consultation Form addresses none of these points and makes no reference to how deconstruction would be done nor where the demand for salvaged material would originate and does not show, in any way, how possible income from salvage will pay for decommissioning.

Finally, regarding the costs of 'decommissioning', Sean Fairfield's letter of April 8, 2013 to then CAO of Loyalist Township says: 'The project developer (Windlectric, Inc. subsidiary of Algonquin Power Co.) is responsible (not the landowner) for all financial issues (including safety and decommissioning costs), regarding the proposed project construction and operation. This is another contradiction from what STANTEC said in its December 2012 report on 'Decommissioning'.

Summarizing these contradictions:

- (i) Algonquin provided no funding for 'decommissioning' in STANTEC's December 2012 REA report.
- (ii) In that report, STANTEC, in the 'Mode Of Disposal of turbine components mentions 'recycle' seven times, placing turbine sections in 'regulated landfills', four times, and 'Salvage' in just two minor mentions and in spite of the fact that no regulated landfills or recycling facilities appear to exist in Ontario.
- (iii) Sean Fairfield's letter of April 8th , 2013 says 'Windlectric Inc...is responsible...for all financial issues including...decommissioning.
- (iv) Algonquin's reply to questions on 'decommissioning' in the Municipal Consultation Form says 'Algonquin will cover the cost of decommissioning by selling the parts for salvage', even though 'salvage ' received just two minor mentions in STANTEC's report.

Mr. Robertson, these contradictions and discrepancies are not lost on Amherst Island residents and reinforce, yet again, that Amherst Island is the wrong place for wind turbines.

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

cc:

- Loyalist Township Council
- Hon. Jim Bradley, Minister of the Environment

- Hon. David Oraziotti, Minister of Natural Resources
- Algonquin Power Inc., Emera Board of Directors
- Mr. Paul Schliesmann, The Kingston Whig Standard
- Ms Doris Dumais, Director, Environmental Approvals, MOE
- Mr. Randy Hillier, PC, MPP
- Mr. Scott Reid , PC, MP