

I refer to the Project Application, Environmental Assessment (EA) and information provided for the Dalton Power project proposal.

The Executive Summary (ES) to the Dalton EA states that the project approval is to construct and operate a gas turbine power plant up to a nominal 1500 mW capacity at Dalton, to be constructed in two stages which would involve the installation of up to six gas turbines, and that approval is sought for both stages of the project under the current proposal. The ES also states that the power station would operate in open cycle mode during time of peak electricity demand, typically for less than 15% of the year.

The detailed environmental assessments of noise and air quality state (variously) that the power station is expected to operate for up to 5% or 15% of the year. The environmental acceptability of the project is predicated on a maximum operation time of 15% of the year.

AGL have stated in their April 2011 Newsletter on the Dalton Power Project that 'It is predicted that over the next decade rising electricity demand will substantially increase the need for rapid response "peaking" power generation in NSW.' AGL have also stated publically at the 27 August Open day at Dalton Church hall that the Dalton power station will operate at any time when it is economic for them to do so. These statements indicate that there is a potential for AGL to operate the power plant in excess of the nominated maximum 15% of the year.

Point 1:

The Dalton EA estimated environmental impacts are based on a maximum operation time of up to 15%. The Conditions of Approval of the project should include a maximum operating time of 15% per year. AGL should also confirm the maximum operating time for both Stage 1 and Stage 2. Any exceedance of 15% should be subject to separate environmental assessment and Department of Planning approval.

In relation to Noise assessment, the ES to the EA states that the predicted noise impacts of the proposed development upon the nearest potentially affected noise sensitive receptor locations have been assessed with consideration of INP, EPA 1999, ECRTN, EPA 1999 and ICNG, DECC, 2009 guidelines.

The detailed specialist assessment of noise identifies the nearest potentially affected noise sensitive receptor locations (Table 2-1) as various rural residences, located between 2.3 to 5.7 km from the gas turbines. Six of the receptor locations chosen are substantially further than the distance of the entire village of Dalton (comprising a population of >100 people, a primary school, churches and various commercial premises (post office, hotel, service station) from the gas turbines. These receptor locations cannot be considered to be representative of Dalton residences.

In relation to the INP assessment, the ES notes that during operation of the power station, noise exceedances above the INP (low frequency) allowable levels are expected at three receptor locations very close to the village. The noise simulation demonstrated by AGL on 26th and 27th August 2011 was based on estimates from the noise modelling that noise level contributions from the power

plant operation, of 32 dB or higher, are expected at various locations on the farthest side of the village from the gas turbines.

The ECRTN assessment of off-site traffic noise did not consider the village of Dalton, including residences adjoining the main road from Gunning, which will be used for all construction traffic movements. The noise sensitive receptor locations selected for the ECRTN assessment, Location D in Dalton, and various sites in Gunning, cannot be considered representative of Dalton as location D is further from access roads than other Dalton residences, and the selected locations in Gunning were affected by local and highway traffic noise, whereas not the case for Dalton.

Point 2: Uncertainties surround the potential noise impacts on Dalton village of construction and operation of the power station, due to the sensitive receptor locations selected not being representative of all village residences, demonstrated exceedances of INP limits, and the inherent limitations of modelling in accurate prediction of actual noise levels.

AGL should commit to, and be required by the Conditions of Approval of the project, at the commencement of both Stages 1 and 2 of the project, to confirm under normal operation the noise emission performance of the power plant, and to perform ongoing noise monitoring during the life of the power station, consistent with NSW INP Noise Policy (EPA, 2000). Appropriate remedial measures should be identified and implemented in the event of exceedances of allowable limits.

AGL should commit to strong community information, consultation, involvement and complaints procedures, and implementation of remedial measures in the event of exceedances, consistent with the statement in the noise assessment that noise impacts of the proposed construction and operation of the plant should not degrade the existing acoustic environment nor create annoyance to residents.

The EA makes extensive reference to the AGL NSW Leafs Gully gas Turbine Power Station – Director General’s Report and project Approval issued by NSW Department of Planning. It is noted that the Leafs Gully project is for a two unit gas turbine power station with a maximum capacity of 300mW. The Approval limits operation of the plant to a maximum of 15% of the year and any exceedances of that capacity requires approval by the appropriate authorities. The Summary of mitigation measures and commitments for Leafs gully includes extensive and specific mitigation measures to be implemented to prevent or minimise any impacts that may arise from construction, commissioning and operation of the plant.

Also of relevance is the approval of a Gas-fired Power Station, Uranquinty Cross Road, Uranquinty, Wagga Wagga, NSW comprising construction and operation of a 600mW gas-fired power station. Stringent conditions have been set on the approval of this project including meteorological and air quality monitoring, air quality performance verification, noise and water quality monitoring, and auditing.

The proposed AGL Dalton power station is for up to six gas turbines with a maximum capacity of 1500 mW. The size of this development greatly exceeds any gas-fired power station previously approved or planned in Australia. The EA states that the power station is expected to contribute up

to 1% of the total NSW NO_x pollutants once in operation. The power station also has an expected operation life of up to 40 years. The Draft Statement of commitments notes that a CEMP and OEMP will be prepared for the project however the proposed environmental safeguards and commitments around these are quite minimal in a number of areas.

Under Air Quality it provides for review of assumptions and emission estimates during the design stage and states that should these increase then the modelling would be revised to meet the standards, however no specific plant design criteria are identified to address this. Dalton and surrounds does not have any air pollution at present however the power station will contribute a massive amount of pollutants to the air, including carcinogens such as formaldehyde and benzene. The EA has not stated where these pollutants will deposit and impact. AGL should state where the pollutants will deposit, and what concentrations are expected in air, soils and water. The cumulative effects of 40 years exposure to these pollutants should also be quantified. NO_x emissions should also be measured throughout operation of the plant, using a Constant Emissions Monitoring System (CEMS).

It is noted that plant restoration and retrofit improvements are identified under Greenhouse Gas Emission however retrofit options are only considered if cost effective. AGL should commit to maintenance of all plant to design condition for the lifetime of the power station and implementation of all available state of technology retrofitting options.

No specific safeguards are identified to minimise dust particulates during construction, from use of trucks on the unsealed access roads surrounding Dalton village. As construction is projected to take four years (two years each for Stages 1 & 2), this should be addressed by appropriate remedial measures such as watering the roads or sealing them, and implementation of speed limits.

The noise mitigation measures and draft commitments proposed for the operation of the power station are minimal, given the size of the development, its proximity to Dalton village and potential for exceedance of noise limits and low frequency noise. AGL should commit to additional mitigation to be incorporated during the detailed design stage such as construction of sound barriers, inclusion of additional silencers, use of the existing topography to relocate/de-cluster plant and processes. Incorporation of these measures at design stage may alleviate the need for retrofit or noise mitigation measures should noise complaints arise following commissioning of the plant.

Point 3: The AGL Dalton Power Project for a 1500mW gas-fired power station is a major industrial development, which will impact the community of Dalton for a very long time. AGL should commit to specific plant design features to significantly reduce, monitor and if possible eliminate hazardous pollutants and degradation of the existing rural acoustic environment. NO_x emissions should be measured throughout the lifetime of the plant, using a constant Emissions Monitoring System (CEMS).