

SUBMISSION OPPOSING AGL PROPOSED EXTENSION TO THE LAPSE DATE - PROPOSED GAS FIRED POWER PLANT PROJECT AT DALTON

I write this submission opposing AGL's proposed extension to the lapse date for the commencement of work on the proposed gas fired power plant project at Dalton (DPP), NSW.

The planning assessment commission granted AGL Energy Ltd project approval for the construction and operation of the DPP under Part 3A of the *Environmental Assessment and Planning Act* 1979. The approval was granted on 19 July 2012.

AGL seeks to modify the project approval to extend the lapse date for a further two years to enable "AGL to review the DPP in line with current technology and energy market circumstances" I note it also mentions "new technology" in the application.

The application refers to 'fast start' aero derivative gas turbines and battery storage. Further, in an Email to Dalton resident Mr Alister Waine on 28 March 2017, Ms Diane Knott (AGL) expanded that list to include solar and diesel.

Extract of email from Ms Diane Knott (AGL) to Mr Alister Waine:

As we've discussed, AGL Energy's current application provides time to consider the gas-fired peaking power station in light of new technology, proposals including the Snowy Hydro pumped storage, and energy market conditions. Technology that AGL may consider to make the project more efficient and complement New South Wales' energy needs may include additions of solar, batteries, diesel, and higher-efficiency gas turbine options.

We are not considering modifying the approved project to a baseload power station.

Details of My Objection

The original AGL Environmental Impact Study addressing air quality notes:

1. The US EPA (2000) identified the following HAP emissions from gas turbines:
 - Acetaldehyde;
 - Acrolein;
 - Benzene;
 - Ethylbenzene;
 - Naphthalene
 - Formaldehyde;
 - Toluene;
 - PAHs; and
 - Xylenes.

Approximately 70% of the total mass HAP emissions were reported to be in the form of formaldehyde.

2. A combination of Emission Standards and Air Impact Assessment Criteria are typically used to evaluate the expected impact of air emissions on local air quality, and the effectiveness of plant design with any associated mitigation measures. The wider objective of these criteria is to ensure that the resulting local and regional ambient air quality meets the relevant Ambient Air Quality Standards.
3. Climate data was obtained for the closest Bureau of Meteorology (BoM) weather stations located at Yass and Goulburn. The weather stations were considered representative of the region, including the proposed development site.
4. Background data for this assessment were sourced from two government monitoring stations these were:
 - Monash (ACT); and
 - Chullora (NSW).

I am astounded that this data has been accepted as being consistent with the weather experienced at and the air quality in Dalton. Apart from natural topographical features such as mountain ranges between the township of Dalton and the data source location points, the assessment has not considered that Dalton and the site of the power station are in a small valley.

The valley creates a weather event that is unique to Dalton. It is a natural confined space! It traps gases and fumes that are created within it. It is not a daily occurrence, however, as the air cools it becomes more frequent as we progress into autumn and winter.

The photo below was taken not more than two weeks ago, and I have noted the event has occurred no less than 3 times since. The photo was taken from a hill on the towns southern limit looking towards the proposed power plant site. Under that cloud is the township of Dalton; and if it was built the stacks of the gas fired power plant. Surely this would increase the density of toxic fumes that resident would be exposed to.



This issue was raised with AGL representatives at a meeting with the community last week. The AGL response, in essence was: *it can be monitored and the plant will be shut down if fumes exceed the safe limit!*

- The discussion that took place with AGL is on the public record and I request you watch the complete video of the discussion taken by the Goulburn Post. The discussion about the Valley and fumes begins at the 1:02:00 mark. The video can be viewed at:

<http://www.goulburnpost.com.au/story/4580479/power-company-faces-the-people/>

With respect, the AGL response is not good enough. If the acceptable safe limit of toxins is exceeded then it is too late because people have already been exposed to unsafe limits.

How can a company be given an extension to a lapse date for a power plant project when all the risks factors have not been properly considered?

In summary, the decision by AGL to return will potentially, have significant environmental and health impacts that to date has not been recognised due to flawed modelling and data. That being the assessment of data from weather stations in Yass and Goulburn rather than data from the point of construction – the valley (a confined space) within which the township of Dalton is located.