

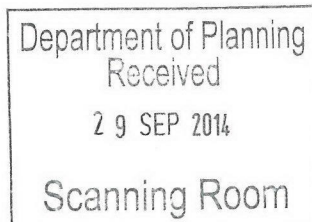


130 Gobolion St.,
WELLINGTON NSW 2820
Ph: 02 68 451546

Email: martinsannikka@bigpond.com

24 September 2014

M/s Karen Jones
Director Infrastructure Projects,
NSW Department of Planning & Environment,
GPO Box 39,
SYDNEY NSW 2001
Ph: 02 9228 6150
Email: karen.jones@planning.nsw.gov.au



Dear M/s Jones,

**RE:OBJECTION TO WELLINGTON GAS FIRED POWER STATION –
MP06_0315 MOD 2**

Further to my letter to you dated 2 September 2014 I wish to make it clear that I object to the Power Station at this site. I do not object to the Power Station provided it complies with NSW Industrial Noise Policy L90 measured background requirements, ie 25dB(A)

It has been brought to my attention by Mr Michael Tolhurst, General Manager, Wellington Council when I made a courtesy visit to him on 23 September 2014, that ambient measured noise level results of 25dB(A) were not disclosed to him prior to the submissions by Wellington Council re MOD 2 being made.

In its Submission to the Department of Planning dated 20 March 2014 Mr Michael Tolhurst, General Manager, Wellington Council states:-

"I have read the summary of the report by Parsons Brinkerhoff Australia Pty Ltd provided in the Memo by Aaron McKenzie on 20 December 2013 and have reviewed the additional information regarding noise. I note the proposed use of two 4000F gas turbines is within the Project Approval modification made on 7 September 2010. I understand this approval observed the modification around gas fired capacity allowed the station to operate as an intermediate as well as peaking plant with a modified annual capacity factor of 40%."

Apropos the PB Memo dated 20 December 2013 :-

(a) Item No.2 specifies five penalties available (tonality, impulsiveness, intermittency, irregularity and dominant low frequency) because they cause greater annoyance. PB have used none or only one in all of their assessments.

(b) Item No.3 of PB Memo – For example, in Attachment B of MOD 1 Submissions Attachment B (page 39) PB have been willing to use low frequency penalty for fin fan noise of

73dB(A) when it is meaningless but it is not added to generator noise of 96dB(A) where it is essential and the penalty is justified.

(c) Items No.3 & No.4 of the PB Memo - In Table 1 adverse conditions includes 5dB(A) penalty. In Table 2 without the 5dB(A) penalty, when added it doesn't match Table 1 where it is already included. eg Nanima in Table 2 of 34.5dB(A) plus 5dB(A) does not equal 37.5dB(A) as stated in Table 1. This is just one example of how they have fiddled figures.

(d) Item No.5 of the PB Memo - C weighting assessments are normally used for loud noises like hearing protection ear muff evaluations not quiet noises like annoyance.

In the Wellington Power Station Assessment – MOD 1 dated 5 March 2010 the total sound power level is not disclosed instead they list various components that contribute to the total. In Attachment B 1/1 Octave Band Source Noise Levels (page 39) the Exhaust Stack Tip Noise Levels are quoted at 101 dB(A) At page 42 the Power Station Revised Propagation modelling noisiest components at Nanima House are split into smaller contributions when added up do not match the original high value eg 101dB(A) exhaust stack where it is split into two areas of 95.3dB(A) ($95.3 + 95.3 = 98.3$).

In the Noise Barrier Investigation dated September 2008 that was incorporated into the original project approval submissions, Table 3.1 – Predicted noise levels with barrier adjacent to Nanima House it is stated at 43dB(A). How can this be known without knowing the total sound power level of the source ?

The width of the proposed noise barrier is stated at only 10m whereas it is said in the Scope of works section ; –

It should be noted that in reality, careful consideration to barrier placement would be required and it is expected that the length of the barrier would need to be at a minimum twice the length of the building façade.

Effects relating to flanking barrier top edge/side edge reflection and transmission coefficients have not been accounted for in the original assessment. These effects would be considered in the detailed design phase.

In other words, if they do not know the total sound power level of the source and they do not know where the barrier should be placed and the width and the material, how can it be known if it would be compliant. ? If it is 43dB(A) in front of the barrier and the barrier drops the noise by only 8dB(A) how can it meet the measured background noise of 25dB(A) and not to exceed it by EPA requirement of 5dB(A).

Yours sincerely,



M Sannikka

Cc Hon Pru Goward – Minister for Planning
Hon Andrew Gee MP – Member for Orange
Dr Norm Broner – Accoustician
Mr Michael Tolhurst , General Manager, Wellington Council,
M/s Sarah Laurie, CEO Waubra Foundation

64

Received 18/6/07 [Signature]

Parsons
Brinckerhoff
Australia
Pty Limited

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Sydney NSW 2000
Australia
Telephone +61 2 9272 5100
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Email sydney@pb.com.au

ABN 80 078 004 798
NCSI Certified Quality System ISO 9001

Our reference: 2116720A/LT_5991/PG/ra

13 June 2007

Nat Barton
'Nanima'
Mudgee Road
Wellington NSW 2820

Dear Nat

Wellington Power Station – ambient noise level monitoring results

As you will be aware, ERM Power has engaged Parsons Brinckerhoff (PB) to undertake the environmental assessment, including community and stakeholder consultation, for the proposed Wellington Power Station project. On behalf of ERM Power we would like to thank you for allowing PB to place a noise logger on your property. The purpose of the 10 day monitoring program was to determine the existing noise environment within the area (the ambient noise level), as a first step in determining the noise impact of the proposed project.

The ambient noise levels at your property were measured and are provided below:

| | | |
|------------------------|--------------------|------------------------------|
| Attended monitoring: | 8:12 am | $L_{A90} = 35 \text{ dB(A)}$ |
| Unattended monitoring: | 7:00 am – 6:00 pm | $L_{A90} = 30 \text{ dB(A)}$ |
| | 6:00 pm – 10:00 pm | $L_{A90} = 26 \text{ dB(A)}$ |
| | 10:00 pm – 7:00 am | $L_{A90} = 25 \text{ dB(A)}$ |

L_{A90} refers to the noise level present for 90% of the time (the background level).

These background levels will be used to determine the appropriate noise limits permissible for the project in accordance with the Environment Protection Authority (now the Department of Environment and Climate Change) Industrial Noise Policy.

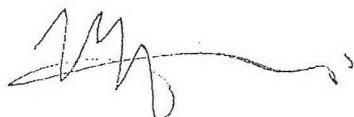
PB and ERM Power appreciate your cooperation during the initial phases of this project. Please also find enclosed a copy of the latest newsletter. This newsletter provides details of the project, the planning and approval process, the current status of the project and contact details if you wish to provide comments on the project or request further information. ERM Power wants to ensure that community comment is considered during the environmental assessment. Your ongoing involvement and feedback during the project is important.

Once again, thank you for your cooperation.

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If you have any enquiries regarding the project, please don't hesitate to contact Paul Greenhalgh, the PB project manager (02 9272 5663) or Mary Diab, PB community consultation team leader (02 9272 5360).

Yours sincerely

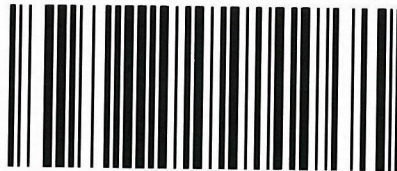


Paul Greenhalgh

Principal Environmental Planner
Parsons Brinckerhoff Australia Pty Limited

Encl. June 2007 Newsletter

2 September 2014



PCU55535

M/s Karen Jones
Director, Infrastructure Projects,
NSW Department of Planning
SYDNEY NSW 2000



Dear M/s Jones,

Re: Wellington Power Station

About 5 years ago I retired and moved to Wellington after working in Testing & Certification Australia in Sydney for 40 years. Now I live on a quiet north facing riverbank facing the proposed power station. See the attached photo taken from my living room 2 years ago.

I had heard rumours of building a massive noisy power station on the edge of the town. Due to my noise background, the idea did not make any sense, so I dismissed it outright until 2 weeks ago, when I became concerned about future noise annoyance for the entire town.

I am writing to you as the Project does not cover how to deal with noise complaints.

Most part of my working life I was an authorised NATA (National Association of Testing Authorities) Signatory in Community Noise Assessments. I have been involved in over one hundred noise complaints against Energy Australia.

I have witnessed noise test on transformers at various manufacture's premises on behalf of Energy Australia covering almost all of their purchases. I also tested some zone transformers on behalf of Tasmanian Hydro Electric Commission and SEQUEB of Queensland. During the early years, only arithmetic averages of pressure levels were calculated. Nowadays quadratic means and more meaningful sound power levels are required. Some manufactures even request frequency spectrums at various distances away.

In addition to the above witness testing, I have performed various field surveys on zone, kiosk and pole transformers. Some zone transformer surveys lasted several years due to volumes involved. The aim was to establish noise records of all zone transformers, especially the ones that had not been witnessed during the manufacturing phase.

A major portion of my work was noise annoyance testing, but I mention briefly having been involved in occupational hearing damage testing, impulse noise testing, ultrasonic noise testing, microphone testing, reverberation times, earmuff assessments, daily noise doses including allowable exposure times etc.

Justified annoyance complaints were usually against noises emanating from Distribution Zone Transformers, Roadside Kiosks Transformers, and Pole Transformers with or without platforms, Air Conditioning Units, Air Compressors and CLC (Customer Load Controller) Motor/Generator Sets used to inject the hourly signals to provide power to off-peak hot water tanks in various households. (There were also dozens of unjustified and marginally justified complaints)

Sometimes more than a single + 5 dB(A) penalty had to be used due to the character of the offending noise and occasionally, when several penalties were involved, various duration allowances were deducted for short lasting event contributions.

There was a brief period when EPA required L95 level background noise compliance. It was too hard to comply in practice and requirements were relaxed to L90 values.

To illustrate what happened with noise complaints over time, I created the following 'generic' story to make the point in layman's language without numbers, dates, places, people etc.:

'Power supplier' had to build a new substation due increasing load. They contemplated possible locations and asked a 'Test house' to perform 'Background noise' survey. 'Test house' found out that 'Location C' had the best 'Background A'. Now 'Power supplier' asked a 'Council', could we build a new substation at 'Location C', getting an answer: If you meet 'Background A', go ahead. 'Power supplier' asked a 'Manufacturer' can you make transformers suitable for 'Background A' that a 'Test house' will pass. They did. New substation was commissioned, everything was fine.

New houses were built closer to the substation. A few years later 'Power supplier' received a noise complaint and asked the 'Test house' to investigate. The result was that the noise complaint was justified. 'Power supplier' approached EPA, explaining that they were the first to arrive on the site, having done everything that was required, and now there is justified noise complaint, what can we do?. EPA answered that it makes no difference who was there first, and if there is a justified noise complaint, resolve it to complainant's satisfaction.

'Power supplier' told the 'Manufacturer' that the transformers you made earlier satisfactorily are no longer quiet enough. We have to move them somewhere else. Can you make quieter ones that the 'Test house' will pass? 'Manufacture' said yes, but best ones are very expensive. Quietest possible transformers were made and commissioned to the complainant's satisfaction.

Years passed, more houses were built closer to the substation. 'Power supplier' received a new noise complaint. 'Test house' found it justified. 'Power supplier' went to EPA, saying that we have a new justified noise complaint. We are using the quietest possible transformers and have satisfied the previous complaints. Can you give us some leniency? EPA said that it is your noise, you have to stop it. Construct brick walls around them! Walls were built and complaints stopped.

Now new high rise development started one street further away, behind the houses that had complained years earlier. New noise complaints were received from high rise residents. 'Test house' learnt that the 4-sided high brick walls reflected noise up, making noise complaints from high rise residence further away justifiable. 'Power supplier' asked EPA, what can we do now?. EPA answered that build a roof over the brick walls. It is your noise; stop it at the boundary, only 'Railways' are excused. 'Power supplier' couldn't build the roof due to heating transformers. The substation was mothballed and years later demolished and the land sold. ('Generic' end)

I was amazed how seriously Energy Australia took my evaluations and how fairly they complied with EPA requirements. Energy Australia changed their name several times, but the culture to improve quality of life stayed. Their senior engineers worked in various committees progressively improving and/or introducing new Australian Standards as technology advanced.

ERM Power Ltd has not disclosed the total sound power level of the source or used their own measured background level of LA90 = 25 dB(A) in any of their assessments.

ERM has disclosed sound pressure/distance from source information combination only for one location. Using that information, I calculated the probable sound power level of the source and estimated 2000m distance to my place and calculated that the offending noise at my place might exceed the background of 25 dB(A) by 9 dB(A)

On the attached map:

Position A indicates the location of the proposed site.

Position B shows where I live.

Inside Circle 1 Offending noises may exceed the background by more than 5 dB(A).

Inside Circle 2 In my opinion, offending tonal noises could be audible, as tonal noises can be heard below the background, hence the penalty. Older people, having lost the masking effect of the higher frequencies, could hear tonal low frequencies relatively louder, making the annoyance worse to them.

So far I have tried to convince you with illustrations, how powerful consequences even a single justified noise complaint may have.

In principle, noise assessment is easy. The most important thing is the background noise level, as the excess that determines the justification, is always referred to it. The science how noise decays with distance is well known. When the sound power level of the source and the background level into what it must decay are known, the circle of the justified complaints area can be drawn.

Please, look at Circle 1 carefully. There may be serious noise consequences anywhere inside it.

I appreciate how difficult it is to determine the total sound power level of an entire plant, that has not even been built yet. That is why the site location is vital. All I can tell you that, as for most of the town the background level is 25 dB(A) there will be problems. If the power station noise at end receiver is 30 dB(A) or less, the noise may be audible, but the noise complaints are unlikely be successful, if the values are higher than 30 dB(A) the complaints may be justified.

I would urge you not to approve the modifications and to let the Project Approval lapse.

Yours sincerely,

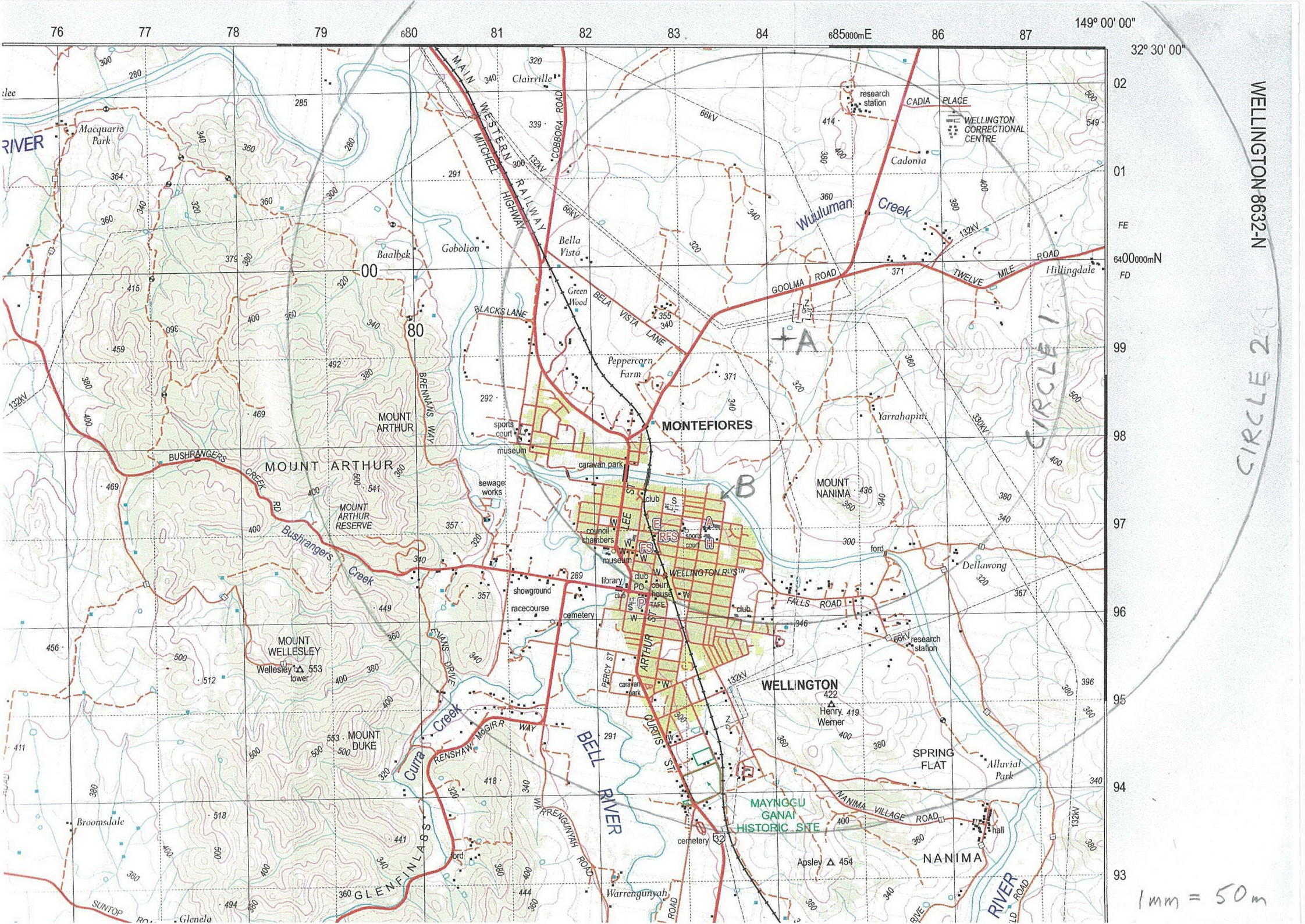


Martin Sannikka
130 Gobolion Street
WELLINGTON NSW 2820
martinsannikka@bigpond.com

cc Hon Pru Goward MP
Hon Andrew Gee MP

POWER
STATION
35 m
HIGH
2 km
AWAY





WELLINGTON 8632-N

CIRCLE 1
CIRCLE 2

1mm = 50m

Rose Rocca

From: Stokes_Office_Email <Office@Stokes.minister.nsw.gov.au>
Sent: Wednesday, 20 May 2015 5:03 PM
To: mcudop
Subject: FOR INFO ONLY : IM15/14755 : Email/Letter from Martin Sannikka 13/05/2015 -Re: Wellington Gas Fired Power Station - MP06_0315.
Attachments: Email_Fw WELLINGTON GAS FIRED POWER STN - MP06_0315.html; ISOPLETH1.docx; ERM's ISOPLETH FROM EA.pdf; TEMPLATE Corro Action Sheet -FOR INFO ONLY.doc

Hello,

Please see the attached correspondence.

Regards,

Office of Minister Stokes
Office of the Minister for Planning

Email: office@stokes.minister.nsw.gov.au
Tel: 02 8574 5924

This message is intended for the addressee named and may contain confidential information. If you are not the intended recipient, please delete it and notify the sender. Views expressed in this message are those of the individual sender, and are not necessarily those of the office of the Minister.

E-mail Message

From: [Martin Sannikka \[SMTP:martinsannikka@bigpond.com\]](mailto:Martin_Sannikka@bigpond.com)
To: [Stokes Office Email \[EX:/O=MIN/OU=EXCHANGE ADMINISTRATIVE GROUP \(FYDIBOHF23SPDLT\)/CN=RECIPIENTS/CN=7665152DA020AB49ABE35242D2EB7AE9-0001278FAB08\]](#)
Cc: [Karen Jones \[SMTP:karen.jones@planning.nsw.gov.au\]](mailto:karen.jones@planning.nsw.gov.au)
Sent: 13/5/2015 at 9:34 PM
Received: 13/5/2015 at 9:34 PM
Subject: Fw: WELLINGTON GAS FIRED POWER STN - MP06_0315

Attachments: ISOPLETH1.docx
 ERM's ISOPLETH FROM EA.pdf

Dear Minister Stokes,

Please see attached for your information.

Yours sincerely,

Martin Sannikka
 130 Gobolion St.,
 Wellington NSW 2820
 Ph: 02 68 451 546
 Email: HYPERLINK "mailto:martinsannikka@bigpond.com"martinsannikka@bigpond.com

From: HYPERLINK "mailto:martinsannikka@bigpond.com"Martin Sannikka
 Sent: Tuesday, May 12, 2015 11:04 PM
 To: HYPERLINK "mailto:wc.rodhuhr@gmail.com"Rod Buhr
 Cc: HYPERLINK "mailto:wc.pipsmith@gmail.com"Pip Smith ; HYPERLINK "mailto:wc.davidgrant@gmail.com"David Grant ; HYPERLINK "mailto:wc.terrydray@gmail.com"Terry Dray ; HYPERLINK "mailto:wc.markgriggs@gmail.com"Mark Griggs ; HYPERLINK "mailto:wc.annejones@gmail.com"Anne Jones ; HYPERLINK "mailto:alisonconn@gmail.com"Alison Conn ; HYPERLINK "mailto:wc.grahamcross@gmail.com"Graham Cross ; HYPERLINK "mailto:wc.marcushanne@gmail.com"Marcus Hanney ; HYPERLINK "mailto:dubbo@parliament.nsw.gov.au"Troy Grant ; HYPERLINK "mailto:karen.roberts@wellington.nsw.gov.au"Karen Roberts
 Subject: WELLINGTON GAS FIRED POWER STN - MP06_0315

Dear Mr Mayor, Councillors & Hon Troy Grant,

Please see attached.

Yours sincerely,

Martin Sannikka
 Ph: 02 68 451546
 Email: HYPERLINK "mailto:martinsannikka@bigpond.com"martinsannikka@bigpond.com.

Dear Mayor Rod Buhr

12 May 2015

Re: ERM's incorrect isopleth data for Wellington's proposed Gas-Fired Power Station

I am disappointed that as an elected representative, you (and ERM) have chosen to try and intimidate me through a series of press articles, expecting that the messenger will eventually shut up. Your unfair, and very public criticism, has only spurred me on to discover even more of ERM's incorrect noise data.

This time please see attached Figure 9-7 from the Environmental Assessment ("EA"). This isopleth is the source of the original incorrect data, from which most of the subsequent incorrect data is produced. This original **incorrect** data has been used as reference, from which the so called "improvements" have been deducted.

The noise impact isopleth shows that Cadonia subdivision is in a wrong location approximately 2600m from the sound source, instead the **correct** distance of 1600m. There are two symmetrical sections of the rings of 4dB(A), each of which increase the Original configuration noise level from 26.5dB(A) to 34.5dB(A). I wonder if Parsons Brinkerhoff ("PB") was confused with the nearby located Jail, the Wellington Correctional Facility, that is close to the designated location of the Cadonia subdivision. No doubt the **undisclosed** infrasound will reverberate inside the cells, causing serious health problems such as cardiovascular disease, severe depression and anxiety, and immunosuppression resulting in serious chronic infections and cancers. These serious **predictable** health problems will result from chronic sleep deprivation and chronic psychological stress, in some of the long term inmates. They will be unable to escape to protect themselves.

Unfortunately ERM's incorrect scaling of the distance for the Cadonia Subdivision wastes so much area on top of the isopleth, that the entire Wellington Township has been left out at the bottom of the isopleth. I have included the location of Council Chambers for reference. Perhaps this was a deliberate omission??

The other important incorrect location on the isopleth is Nanima House, which is shown approximately 900m from the sound source instead of the correct distance of 700m. The symmetrical section of the ring of 4dB(A) increasing the original condition noise level from 43dB(A) to 47dB(A).

Therefore ERM's first claim that the MOD1 offending noise at Nanima House inside the noise barrier is 35dB(A) has failed as $47 - 8$ (noise barrier reduction) = 39dB(A). This is clearly noisier than the Compliance goal 35dB(A).

ERM's second claim that the proposed 2 turbine noise of MOD2 at Nanima House is less than 40dB(A) has also failed, as $47 - 5$ (improvement due to "quieter" turbines being only 5dB(A) instead of incorrectly claimed 7dB(A) = 42dB(A), resulting in forced acquirement of heritage listed house. This error was pointed out to you in my "fruit salad" letter of 27 April 2015.

The problem with ERM is that they designed the Uranquinty fiasco using wrong turbines like Mars 100 for modelling, yet admitting that their preferred supplier is Siemens. ERM also grossly under estimated the frequency of temperature inversions, resulting massively incorrect adverse conditions.

For Wellington, at least ERM got the supplier's name, Siemens right. However, the weather data was measured at the wrong height resulting in a temperature inversion penalty of 1.5dB(A). When the corrected Neutral conditions are subtracted from corrected Adverse conditions the implied corrected temperature inversion is up to 5.5dB(A). This is yet another material difference which operates yet again in the proponents favour and against the protection of the residents of Wellington, this time of 4dB(A).

The problem for Wellington Council is self-inflicted. I would suggest that Council supported this Project unconditionally from the outset, and implied to the NSW Department of Planning that they were comfortable with the noise figures ERM submitted to them in the EA and MOD1. It seems to me that the Department did not evaluate these figures, for had they done so with any competence and due diligence, they would have spotted the incorrect data in the 20 instances that I have spotted so far. Parsons Brinkerhoff despite their international reputation has made mistakes and demonstrable incompetence everywhere in their Wellington data.

It is no wonder that PB has failed to produce correct data, because ERM would not disclose the total sound power level at the source even to them, and not to the NSW Department of Planning, the Wellington Council or to me.

Wellington Council has now a unique opportunity to prevent what will be a public health disaster from predictable severe noise nuisance, affecting the township of Wellington and the surrounding properties – employ someone like Steven Cooper and reject the nonsense that is peddled and advise the NSW Department of Planning that the current Council do not support this development at this site – it is too close to Wellington and MOD2 should not be approved at this site.

To make the noise intrusion appear artificially quieter and less annoying ERM and PB have used the following tricks:

1. Weather data was measured at the wrong height and in the wrong location resulting in temperature inversion of only 1.5dB(A) in the EA.
2. Over estimating the effectiveness of the noise barrier with seven assumptions in the PB Noise Barrier Investigation.
3. Adding only 3dB(A) instead of 5dB(A) as low frequency noise penalty in PB MOD2 Memo.
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6. Totally disregarded the contribution of infrasound in all of the models.
7. Introduced the plant as peaking plant to be operated only 4% of the time.
8. Not disclosing the total sound power level at the source making it impossible to determine any further away noise readings.
9. Attempted to intimidate and shut up the messenger of ERM's incorrect data news.

The NSW Department of Planning do not care about the proposed site, alternative sites or Wellington's sufferings. They have inappropriately trusted the infallibility of PB's status and blindly approved the initial application. Wellington Council has no noise expertise, but you have now been warned by me and others of the predictable unavoidable public health and legal disasters which will ensue, and for which you and your councillors and council staff will be responsible. I have advised you repeatedly to obtain independent expert acoustic advice – Mr Steven Cooper is willing and able to work for you and he is only a single phone call away for an initial contact.

In addition to employing Mr Steven Cooper, the Council should encourage the Deputy Premier and Member for Dubbo, Hon Troy Grant MP to keep his pre-election promise of a review into this project proposal. That review should include scrutiny of the actions of the NSW Department of Planning, both with respect to the noise issues, but also with the failure of the NSW Department of Planning to support their claims of substantial commencement or more importantly physical commencement. This was promised to the former Minister for Planning, Minister Goward, Hon Andrew Gee MP, Nat Barton, myself and others at our ministerial meeting in Sydney on 3 February 2015 but has never materialised.

Yours sincerely,

Martin Sannikka

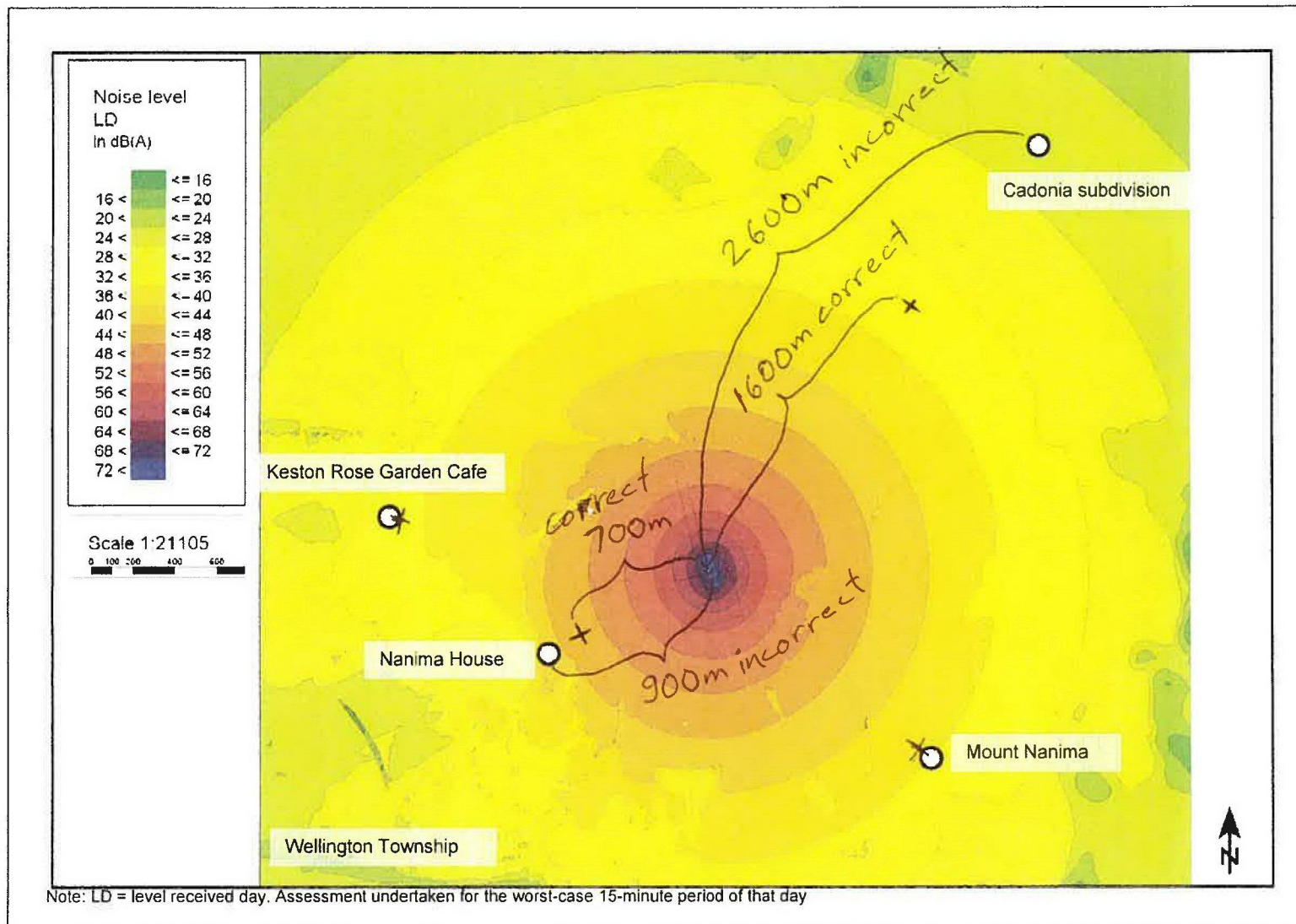


Figure 9-7 Predicted noise impact isopleth (neutral conditions with +5 dBA low frequency modifying correction factor) for the power station and surrounding environment

← Council Chambers

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8. Not disclosing the total sound power level at the source making it impossible to determine any further away noise readings.
9. Attempted to intimidate and shut up the messenger of ERM's incorrect data news.

The NSW Department of Planning do not care about the proposed site, alternative sites or Wellington's sufferings. They have inappropriately trusted the infallibility of PB's status and blindly approved the initial application. Wellington Council has no noise expertise, but you have now been warned by me and others of the predictable unavoidable public health and legal disasters which will ensue, and for which you and your councillors and council staff will be responsible. I have advised you repeatedly to obtain independent expert acoustic advice – Mr Steven Cooper is willing and able to work for you and he is only a single phone call away for an initial contact.

In addition to employing Mr Steven Cooper, the Council should encourage the Deputy Premier and Member for Dubbo, Hon Troy Grant MP to keep his pre-election promise of a review into this project proposal. That review should include scrutiny of the actions of the NSW Department of Planning, both with respect to the noise issues, but also with the failure of the NSW Department of Planning to support their claims of substantial commencement or more importantly physical commencement. This was promised to the former Minister for Planning, Minister Goward, Hon Andrew Gee MP, Nat Barton, myself and others at our ministerial meeting in Sydney on 3 February 2015 but has never materialised.

Yours sincerely,

Martin Sannikka