



October 12, 2017

Mr. Mohsen Keyvani
Director, Section 47.5, EPA
Ministry of the Environment & Climate Change
(Hand Delivered Hardcopy & by e-mail)

Mr. Steven Moggy
Sr. Environmental Officer, Sudbury District
Ministry of the Environment & Climate Change
(by e-mail)

**SUBJECT : McLean's Mountain Wind Farm - REA Approval # 7733-8XUNS5
2014 Acoustic E-Audit Review Status and Corrective Action**

Re-submission of Wind Turbine E-Audits – Turbines #5, #15 and #16

This letter is in reply to your letter dated July 11, 2017, specifically regarding the Acoustic E-Audit (REA Condition F) section, and in reply to your e-mail dated September 20, 2017, point #3. Those correspondence are attached for your reference following this cover page.

As agreed, please find attached one copy each of up-dated acoustic E-Audit reports conducted and prepared in accordance with IEC 61400-11 Edition 3.0 standard, for Turbines #5 (2.66 MW rating), #15 (2.49 MW rating) and #16 (2.49 MW rating).

We trust these re-submissions will meet with your satisfaction. Please feel free to contact me if you have any concerns about this matter.

Regards

Jim Mulvale

Senior Director, EH&S
Northland Power Inc.
30 St. Clair Ave West, 12 th Floor
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416 662 1437 (cell)
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jim.mulvale@northlandpower.ca

Jim Mulvale

From: Keyvani, Mohsen (MOECC) <Mohsen.Keyvani@ontario.ca>
Sent: September-20-17 4:47 PM
To: Jim Mulvale
Cc: Cameron, Brian (MOECC); Brennan, Drew (MOECC); Moggy, Steven (MOECC); Miller, Denton (MOECC); Zangeneh, Mahdi (MOECC); Satkunanathan, Kuruparan (MOECC); Keyvani, Mohsen (MOECC)
Subject: RE: McLean's Mtn Wind Farm - Follow-up to MOE Noise Audit Letter (E-Audit)

This correspondence is in response to your September 8, 2017 letter to myself and Mr. Steven Moggy, Sr. Environmental Officer, Sudbury District Office.

The September 8, 2017 letter acknowledges / states that:

1. the REA approval (as amended) requires the following E-Audits:
 - a. One (1) audit at a 2.66 MW turbine;
 - b. Two (2) audits at turbines rated at 2.49 MW; and
 - c. One (1) audit at the only turbine rated at 2.38 MW in the facility.
2. None of the submitted audits have adequate data for a detailed review. *(To date only three of the required four audit were submitted. An audit for the only 2.38 MW turbine in the facility was not submitted.)*
3. Your firm will resubmit the following audits, assessed by edition three of the applicable standard by **October 15, 2017** (this submission date exceeds a date of 60 days after my July 11, 2017 which was September 9, 2017):
 - a. One (1) audit at a 2.66 MW turbine; and
 - b. Two (2) audits at turbines rated at 2.49 MW.
4. In regards to the fourth E-Audit which was to address the only 2.38 MW turbine, your firm proposes to submit an application to amend the REA. The amendment will provide justification to delete the audit requirement for the 2.38 MW turbine.

The rationale for the exclusion of an audit at this location is primarily due to the topography and vegetation in proximity to the 2.38 MW turbine. It is stated that the subject area is heavily forested and very hilly. As a result of the proximity of the trees, it is not possible to install the sound level meter and the wind mast/anemometer to conform to the requirements of the IEC standard. Please submit the REA amendment application no later than **October 15, 2017** (this submission date exceeds a date of 60 days after my July 11, 2017 which was September 9, 2017).

In response to items 3 and 4 above, we find the proposed approach and timings to be acceptable. Please proceed as detailed above.

Furthermore, it is ministry's expectation that you post a copy of the complete acoustic audit reports on the company's website within 10 days of submission of the reports to the ministry.

Sincerely,

Mohsen Keyvani

Mohsen Keyvani, P.Eng. | Supervisor – Team 5 (Renewable Energy) | Environmental Approvals Branch | Ministry of the Environment and Climate Change
2 St. Clair Avenue West, Floor 12A, Toronto, ON M4V 1L5 | Tel: 416-314-8573 | Fax: 416-314-8452 | Toll Free: 1 800 461-6290 | Email: mohsen.keyvani@ontario.ca

Jim Mulvale

From: Jim Mulvale
Sent: September-08-17 10:47 AM
To: 'Moggy, Steven (MOECC)'; 'Keyvani, Mohsen (MOECC)'
Cc: 'Miller, Denton (MOECC)'
Subject: McLean's Mtn Wind Farm - Follow-up to MOE Noise Audit Letter (E-Audit)
Attachments: MMWF_MOE_Noise E-Audit Action Ltr-2017 09 08.pdf

Further to our discussion on August 24, 2017, please find our response to the MOE&CC letter of July 11, 2017, related to the E-Audits of the McLean's Mountain Wind Farm and the determination that some aspects of the reporting are "incomplete".

Sorry for the delay in documenting our corrective action approach, Aercoustics needed a bit of time to review the data we had previously collected.

Regards

Jim Mulvale, P.Eng. | Sr. Director, EH&S
Northland Power Inc
30 St. Clair Ave. West, 12th Floor
Toronto, Ontario
M4V 3A1

d: 647.288.1273 | c: 416 662 1437



September 8, 2017

Mr. Mohsen Keyvani
Director, Section 47.5, EPA
Ministry of the Environment & Climate Change
(by e-mail)

Mr. Steven Moggy
Sr. Environmental Officer, Sudbury District
Ministry of the Environment & Climate Change
(by e-mail)

**SUBJECT : McLean's Mountain Wind Farm - REA Approval # 7733-8XUNS5
2014 Acoustic E-Audit Review Status and Corrective Action**

This letter is in reply to your letter dated July 11, 2017, specifically regarding the Acoustic E-Audit (REA Condition F) section, and is also a follow-up to our phone conference call of August 24, 2017.

As discussed during our conference call, the REA approval (as amended) requires E-Audits at 4 turbines, and specifically 1 audit at a 2.66 MW turbine, 2 audits at the 2.49 turbines and 1 audit at the only 2.38 MW turbine. The E-audits are to be completed in accordance with the IEC-61400-11 standard. Based on a preliminary review of the E-Audits submitted under a cover page dated November 21, 2014, the MOE&CC concludes that the submitted audits are not complete enough to proceed to a comprehensive review.

Your letter, dated July 11, 2017, suggested that we should review the Compliance Protocol Section 3 for options on how to address the incomplete report situation.

As discussed in our phone call, and upon review of the Compliance Protocol, we wish to confirm that we will prepare and re-submit E-Audit reports for the 2.66 MW and the two 2.49 MW turbines and the analysis and reports will conform to Edition 3 of the IEC 61400-11 Standard. Your letter, dated July 11, 2017, stipulated a due date of September 11 for submission of any corrections to the original reports, and we respectfully request an extended due date of October 31, 2017, to allow the acoustic consultant time to fully analyze the historical data and prepare three new reports.

In regards to the fourth E-audit covering the only 2.38 MW, I propose to submit an application to amend our REA permit to delete this audit requirement. As the acoustic consultant described, the physical location of the 2.38 MW turbine is situated in a forest area which is very hilly and undulating. As a result of the trees, there is no way to install the noise meter and the wind mast/anemometer and conform to the IEC standard. Since we have never received a noise complaint associated with the operation of this turbine, we feel that the E-Audit requirement can be removed. We will provide further rationale in our amendment application. I would also ask that we be allowed to submit the amendment application not later than October 31, 2017.

We trust this letter meets with your satisfaction. Please feel free to contact me if you have any concerns about this matter.

Regards



Jim Mulvale

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July 11, 2017

TO: Jim Mulvale
McLean's Mountain Wind GP Inc. (Northland Power)
30 St. Clair Ave W 12th Floor
Toronto, ON, M4V 3A1

RE: REA Approval #7733-8XUNS5 – Acoustic Audit Status and Options

Dear Mr. Mulvale,

Ministry of the Environment and Climate Change (ministry) records indicate that the McLean's Mountain Wind Farm Project is operational and has been issued Renewable Energy Approval (Approval) #7733-8XUNS5. Within the Approval are two acoustic audit Conditions (E and F) that require your attention.

I-Audit (Condition E):

Condition E of the Approval requires two (2) sets of Acoustic Audit -Immission (I-Audit) Reports to be conducted at three (3) Points of Reception. The first set of I-Audit Reports must be conducted and submitted to the ministry no later than nine (9) months, and the second set, no later than fifteen (15) months after commencement of operations. Based on a preliminary review of the I-Audit Reports submitted, the ministry has determined that they do not contain enough information to begin our comprehensive review process required to demonstrate compliance with the noise performance limits.

Based on consultation with the regulated community, the ministry released on April 19, 2017 an updated Compliance Protocol for Wind Turbine Noise – 2017, NPC 350 (Protocol), which outlines the options available to proponents with incomplete acoustic audits. Here is a summary of options available:

Option #1. Supplement Audits with Existing Data

The proponent or the consultant that conducted the audit may have additional data that was not initially provided to the ministry. This option allows proponents to revisit all existing data already

collected and use it to supplement their audit reports, and then re-submit them to the ministry. The supplementary data may be enough to deem the I-Audit Report(s) complete without further measurements being required. For additional details, please refer to the Protocol.

If Option #1 is selected, you must submit the additional information to the ministry within 3 months of the date of this letter.

Option #2. Combining Audit Measurements

The proponent may combine data from two existing, but incomplete, I-Audit Reports (audits conducted prior to April 19, 2017) if the background noise criteria are met. This may result in one complete I-Audit Report based on the previous Compliance Protocol for Wind Turbine Noise, July 2011. The proponent would then be required to conduct an additional I-Audit in accordance with the Protocol. For additional details, please refer to the Protocol.

If Option #2 is selected, you must submit the first I-Audit Report (combined and complete) within 3 months of the date of this letter and the second (new) I-Audit Report, within 9 months of the date of this letter.

Option #3. Conduct Two Audits as per 2017 Protocol

The proponent may opt to conduct two audits in accordance with the Protocol, and submit to the ministry for review.

If Option #3 is selected, the proponent must submit the additional information to the ministry within 15 months of the date of this letter.

Please select an option above and notify the ministry of your selection, in writing, within 30 days of the date of this letter. In addition, please re-submit your I-Audit Reports / additional information according to the requirements and timelines outlined above.

E-Audit (Condition F):

Condition F of the Approval requires an Acoustic Audit -Emission (E-Audit) Report to be conducted at three (3) different turbine locations, and submitted to the ministry no later than six (6) months after commencement of operations. Based on a preliminary review of the E-Audit Report submitted, the ministry has determined that it does not contain enough information to begin our comprehensive review process required to demonstrate compliance with the noise performance limits.

The Protocol outlines options available to proponents with incomplete E-Audit Reports. Please submit the missing data to the ministry within 60 days of the date of this letter (per section E.3.2), or consult section E.3 of the Compliance Protocol for additional options to address this matter.

The ministry looks forward to your prompt reply and continued cooperation in addressing the items outlined above. Failure to comply with this request will result in a referral to the local district office which may choose to utilize appropriate compliance and enforcement tools to bring the facility into compliance. These tools may include a Provincial Officer's Order requiring a

company implement a Noise Abatement Action Plan (e.g. de-rate turbines) or requiring turbine operation to be suspended until compliance can be assured. If you have any questions or require any further information regarding the above, please contact me at 416-326-6095 or mohsen.keyvani@ontario.ca.

Yours truly,

A handwritten signature in blue ink, appearing to read 'Mohsen Keyvani', with a long horizontal stroke extending to the right.

Mohsen Keyvani, P.Eng.
Director
Section 47.5, *Environmental Protection Act*

c.c. Ron Dorscht, District Manager, Sudbury District Office