

## William Cundiff

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**From:** Robert Anders [lhanders3@aol.com]  
**Sent:** Wednesday, January 26, 2011 5:31 AM  
**To:** wCundiff@DouglasMa.org  
**Subject:** Fwd: Unsigned Letter on Vestas Letterhead Submitted by Ms. Argo and Mr. Jane  
**Attachments:** Vestas Letter submitted by Liz Argo.pdf; ATT00007.htm; vestasv90-100\_safetymanual.pdf; ATT00010.htm

Begin forwarded message:

**From:** Eric Bibler <[ebibler@gmail.com](mailto:ebibler@gmail.com)>  
**Date:** January 26, 2011 12:16:06 AM EST  
**To:** Kristy Senatori <[kseiatori@capecodcommission.org](mailto:kseiatori@capecodcommission.org)>, Martha Hevenor <[mhevenor@capecodcommission.org](mailto:mhevenor@capecodcommission.org)>, Page Czepiga <[pczepiga@capecodcommission.org](mailto:pczepiga@capecodcommission.org)>, Paul Niedzwiecki <[pniedzwiecki@capecodcommission.org](mailto:pniedzwiecki@capecodcommission.org)>, Ryan Christenberry <[rchristenberry@capecodcommission.org](mailto:rchristenberry@capecodcommission.org)>, Sarah Korjeff <[skorjeff@capecodcommission.org](mailto:skorjeff@capecodcommission.org)>, Sharon Rooney <[srooney@capecodcommission.org](mailto:srooney@capecodcommission.org)>  
**Subject:** Unsigned Letter on Vestas Letterhead Submitted by Ms. Argo  
**Return-Path:** <[randers+caf\\_lhanders3=aol.com@blueberryhillassociation.com](mailto:randers+caf_lhanders3=aol.com@blueberryhillassociation.com)>  
**Received:** from mtain-dk07.r1000.mx.aol.com (mtain-dk07.r1000.mx.aol.com [172.29.180.11]) by air-ma08.mail.aol.com (v129.4) with ESMTP id MAILINMA084-b5334d3fae543e4; Wed, 26 Jan 2011 00:17:08 -0500  
**Received:** from mail-vw0-f51.google.com (mail-vw0-f51.google.com [209.85.212.51]) by mtain-dk07.r1000.mx.aol.com (Internet Inbound) with ESMTP id 6636738000FF for <[lhanders3@aol.com](mailto:lhanders3@aol.com)>; Wed, 26 Jan 2011 00:16:59 -0500 (EST)  
**Received:** by vws20 with SMTP id 20so264696vws.38 for <[lhanders3@aol.com](mailto:lhanders3@aol.com)>; Tue, 25 Jan 2011 21:16:59 -0800 (PST)  
**Received:** by 10.220.182.7 with SMTP id ca7mr1474168vcb.163.1296019015793; Tue, 25 Jan 2011 21:16:55 -0800 (PST)  
**Received:** by 10.220.188.137 with SMTP id da9cs137567vcb; Tue, 25 Jan 2011 21:16:32 -0800 (PST)  
**Received:** by 10.236.105.180 with SMTP id k40mr1486130yhg.93.1296018987363; Tue, 25 Jan 2011 21:16:27 -0800 (PST)  
**Received:** from mail-yx0-f173.google.com (mail-yx0-f173.google.com [209.85.213.173]) by mx.google.com with ESMTPS id I9si3227846yhl.10.2011.01.25.21.16.24 (version=TLSv1/SSLv3 cipher=RC4-MD5); Tue, 25 Jan 2011 21:16:25 -0800 (PST)  
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**X-Forwarded-To:** [lhanders3@aol.com](mailto:lhanders3@aol.com)  
**X-Forwarded-For:** [randers@blueberryhillassociation.com](mailto:randers@blueberryhillassociation.com) [lhanders3@aol.com](mailto:lhanders3@aol.com)  
**Delivered-To:** [randers@blueberryhillassociation.com](mailto:randers@blueberryhillassociation.com)  
**Received-Spf:** pass (google.com: domain of [ebibler@gmail.com](mailto:ebibler@gmail.com) designates 209.85.213.173 as permitted sender) client-ip=209.85.213.173;  
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**Content-Type:** multipart/mixed; boundary=002354435d18c7d05e049ab8ee05  
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**X-Aol-Vss-Info:** 5400.1158/67703  
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**X-Aol-Scoll-Authentication:** mail\_rly\_antispam\_dkim-d006.2 ; domain : gmail.com DKIM : fail  
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**X-Aol-Ip:** 209.85.212.51  
**X-Mailer:** Unknown (No Version)

Ms. Ryan Christenberry  
Energy Planner  
Cape Cod Commission

Ms. Page Czepiga  
Regulatory Officer  
Cape Cod Commission

Re: Letter Submitted by Ms. Argo Regarding Vestas Safety Manual

January 25, 2011

Dear Ms. Christenberry,

Thank you for providing me with a copy of the letter that was submitted by Ms. Liz Argo, a paid spokesperson for the Cape and Vineyard Electric Cooperative (CVEC), during the meeting of the Cape Cod Commission on January 20th, 2011. I've attached a copy of the letter here for reference.

According to Ms. Argo, this is a letter from Vestas which "corrects and clarifies" certain errors in the Vestas Safety manual for the Vestas Model V90 Wind Turbine which CVEC. The letter is dated "November 15, 2010" and it bears the heading:

"RE: Vestas Safety Manual -- Correction and Clarification of Language"

To be frank, we are concerned about the authenticity and the significance of this letter for reasons that are enumerated below.

1. To the best of my recollection, Ms. Argo said in her remarks that she would be submitting a letter from Vestas stating that the Safety Manual for the Vestas V90 contained an error, but she did not say how this letter came into her possession. Where did it come from and how did Ms. Argo obtain it?
2. The letter is not addressed to anyone.
3. The letter is not signed by anyone at Vestas, nor is there any indication what authority, if any, that it carries.
4. The letter states that in "certain older versions" of the Vestas V90 manual, the specific precaution that workers stay outside a specific radius was misplaced in the "General Precautions" section and "was meant to apply only in case of abnormal operation such as fire" and was not meant to apply to normal operations.

The manual also states in the preamble, however, in a Section entitled "Updating of the Manual," that:

**The manual will continuously be brought up to date. Corrections to each specific chapter are listed for the past year under the heading of "History of this Document"**

Why not simply produce an updated version of the safety manual? Or, at minimum, the relevant pages? Why does the letter not say that "the manual has been corrected and the new language reads as follows...."

5. The letter asserts that the wind turbines are safe "under normal operation" but affirms that the prescribed safety perimeter applicable to the particular model still obtains in case of "abnormal operation" such as fire.

What does it mean, from a legal standpoint, for a manufacturer to say that no safety perimeter is required if the machine functions normally but that the prescribed perimeter should be enforced if the machine malfunctions or catches fire? Can abnormal operations be predicted? Isn't that like saying that one needn't wear a seat belt in a car, as long as one doesn't have an accident and hit anything?

Under the circumstances, we would respectfully ask the Joint Planning Committee and the Commission *not to accept* this letter at face value *until* its authenticity can be verified by the Vestas legal department or until a revised version of the Safety Manual can be obtained. We believe that it is important to know where it came from and that it carries the same legal authority as the owners safety manual.

#### What is the Proper Perimeter, Under Normal Circumstances, to Ensure Safety Against "Abnormal Operation"?

We also firmly believe that even in the event that this "correction" proves to be authentic, that the Commission should consider carefully the extent to which it is willing to sanction the exposure of property, buildings, businesses, employees, residents, roads, recreational users and other people and structures to risk from "abnormal operation" of a wind turbine whose individual blades weigh more than 14,000 lbs.

If the Joint Committee and the Commission do decide to allow industrial wind turbines to be constructed in such a manner that buildings, residents, innocent bystanders and motorists may all be subjected to this kind of risk within the "stay clear" area (even under "abnormal operation"), we believe that they should give some serious thought to whether an operator would realistically be capable of sounding the alarm, and evacuating a vast area -- a circular area with a diameter of approximately half a mile -- on short notice.

It goes without saying that lightning strikes, fires, mechanical malfunctions, blade throw and the like, are not "scheduled events." Furthermore, it is worth noting that the wind turbines are usually remotely managed by technicians off site, to a large degree,

What sort of procedures should a wind turbine operator have in place? And how much margin for error should be tolerated in terms of the "clear area"?

These are all relevant questions, in addition to the question of what the most recent Vestas Safety Manual actually says.

I would appreciate it if you would provide me with any additional information that you receive which serves to authenticate the source and its authority.

Sincerely,

Eric Bibler  
President

Cc: Bourne Planning Board

Cc: Brewster Planning Board

Cc: Assembly of Delegates