



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

MEMORANDUM

TO: Justin Wolfe, Deputy General Counsel
THROUGH: Cindy Mulkey, Program Administrator
FROM: Amanda Dyer, Case Manager
DATE: March 28, 2018
SUBJECT: SHEC Shady Hills Combined Cycle Facility Completeness Determination

Pursuant to §403.5066, Florida Statutes, the Department of Environmental Protection (DEP), after consulting with the affected agencies, has determined that the Shady Hills Energy Center (SHEC) Shady Hills Combined Cycle Facility Site Certification Application (Application) is not complete.

Below are requests for additional or clarifying information from:

- Pasco County; and
- DEP Siting Coordination Office

The following agencies found the application complete and/or did not provide comments:

- Department of Economic Opportunity
- Southwest Florida Water Management District;
- Florida Fish and Wildlife Commission;
- Department of Transportation; and,
- Department of State – Division of Historical and Cultural Resources

Agency comments/questions are listed below “*as received*” by the Department. It should be noted that some questions proposed are those for which answers may not be available until the post-certification phase of the certification process, should the project be approved. SHEC should identify those items it believes may be more suitably handled through post-certification submittals and propose related conditions of certification.

A. PASCO COUNTY

1. Regarding Section 4.4 of the Application:
 - a. Does SHEC plan on applying for the required utility service connections and submitting all supporting documentation, design plans, construction permits, etc. for water, wastewater, and reclaimed water service to and on the site, outside the site certification process?
 - b. Where will the delivery point be for reclaimed water supply?
 - c. What will be the flow-rate variations, volumes, on-site storage, improvements, and delivery configurations for reclaimed water supply?
2. Regarding Section 4.6 of the Application:

Pasco County needs further clarification about the solid waste streams to come from the plant; specifically, the dewatered lime softening clarifier sludge and dewatered solids from Zero Liquid Discharge wastewater treatment technology. The application states, *“An approved commercial solid waste contractor will collect and transport the solid waste for disposal in accordance with Chapters 62-701 or 62-702, F.A.C.”* Where does SHEC intend ultimate disposal of the non-hazardous waste to occur?
3. Regarding Section 9.3 of the Application:
 - a. The proposed electrical corridor is proposed to be on the site of the Pasco County Resource Recovery Facility. Will this corridor replace the corridor that currently serves the neighboring power facility?
 - b. The 200' easement does back up near the southwest corner of the cleared area of the biosolids facility. Will the new power line require the removal of the existing trees and to what extent?
 - c. Will a sufficient visual and noise barrier for the biosolids facility be provided?

B. DEP SITING COORDINATION OFFICE

1. The boundary of the certified Shady Hills Combined Cycle Facility Site is unclear in the Application. For example:
 - The SCA includes the following statement on page 7 in Section 3.1: *“Off-site associated facilities that are being certified include the 0.6 mile 230-kV interconnection tie-line, which will be approximately one-mile in length and connect with a new DEF (Hudson North) substation (which in the process of being sited) and an offsite temporary construction parking and laydown area.”*

This statement implies that the temporary lay-down area is to be certified and therefore become a part of the “Site”.

- There are two definitions of “SHCCF Project” on page xvii of the application. One definition seems to refer to the “Project” and the other seems to refer to the “Certified Project” or the “Project”. Both definitions include the same associated facility components of the site (the 230-kV interconnection and the construction parking and laydown area).

Please provide clarification and a map delineating the boundaries of:

- a. the site for which you are seeking certification and which you are proposing will ultimately become the certified “Site” (including associated facilities); and,
 - b. the boundaries of off-site associated facilities that are a part of the project review, but that you are not proposing to become part of the certified “Site”.
2. It is unclear in the application the dimensions of the 230-kV interconnection tie-line corridor. For example:
- Pages i, xxii, 1, 4, 40, and 90 describe the 230-kV interconnection tie-line as being, “*about 0.6 mile in length;*”
 - Pages xvi and 90 state that, “*the transmission corridor is about 0.6 mile in length, 200-feet wide...*”
 - Page 7 states “*Off-site associated facilities that are being certified include the 0.6-mile 230-kV interconnection tie-line, which will be approximately one-mile in length and connect with a new DEF (Hudson North) substation (which is in the process of being sited) and an offsite temporary construction parking and laydown area.*”

Please provide clarification on the length and width of the 230-kV interconnection tie-line corridor.

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

IN RE: SHADY HILLS ENERGY CENTER, LLC
COMBINED CYCLE FACILITY POWER PLANT
SITING APPLICATION NO. PA 18-59

CASE No. 18-0995EPP
OGC CASE No. 18-0119

PASCO COUNTY'S STATEMENT OF COMPLETENESS

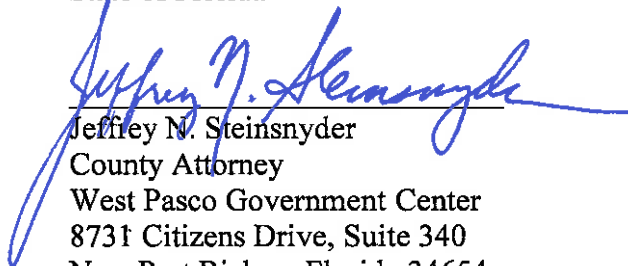
Pursuant to Section 403.5066, Florida Statutes, Pasco County, by and through the undersigned counsel, files the County's Statement of Completeness regarding the application for site certification of the proposed Shady Hills Combined Cycle Facility (SHCCF).

1. Pasco County has reviewed the application submitted to the Department of Environmental Protection on February 16th, 2018.

2. Pasco County has the following questions on the application's completeness attached hereto as Exhibit "A".

Respectfully submitted, this 23rd day of March, 2018.

PASCO COUNTY, a political subdivision of the
State of Florida


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Exhibit A

Pasco County comments - Shady Hills Combined Cycle Facility Power Plant

Siting Application No. PA 18-59 - Shady Hills Energy Center, LLC

Case No. 18-0995EPP; OGC Case No. 18-0119

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