

10/26/15

Dept. of Environmental Protection
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COMMUNITY DEVELOPMENT DEPARTMENT
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October 21, 2015

Ann Seiler
Florida Department of Environmental Protection
Siting Coordination Office
2600 Blainstone Road, MS 5500
Tallahassee, FL 32399-2400RE: Indian River County Staff Completeness Review Comments on Site Certification
Application – FPL Okeechobee Clean Energy Center (PA15-58)

Dear Ms. Seiler:

Indian River County staff appreciates the opportunity to provide completeness and information-related comments on the subject powerplant application. Staff also acknowledges diligent efforts by FPL representatives to coordinate multiple issues with county staff.

The subject powerplant facility is proposed to be located in northeastern Okeechobee County near the Okeechobee/Indian River County line, and will be accessed solely through Indian River County to SR 60. Impacts will occur during project construction and operation. Indian River County staff have reviewed the FPL site certification application submitted September 25, 2015 and offer the following comments.

Traffic (Public Works Director Chris Mora, P.E.: 772-226-1234)

1. The applicant and its representatives have coordinated with Indian River County Traffic Engineering and submitted a traffic impact study. Based on that study, Traffic Engineering and the Public Works Director have determined that an eastbound right turn lane on SR 60 at the Main Project Entrance is required. That required improvement needs to be reflected in a revised application section 5.7.2, current page 5-18. Section 6.9.1 (current page 6-20) and possibly other figures and/or sections need to be updated accordingly.

Emergency Services (Emergency Services Director John King: 772-226)

1. Section 3.2.8.3 Medical Facilities: The application states "There are nine hospitals within 30 miles of the Site." A MapQuest search for road miles, with a starting point at the Main Project Road/SR 60 entrance, yields the following:
 - Indian River Medical Center is 25.2 miles
 - Sebastian River Medical Center is 34.1 miles
 - Lawnwood Regional Medical Center is 35.9 miles
 - Raulerson Hospital is 42.2 miles

- Florida Hospital Kissimmee is 66.3 miles

It appears that the section needs to be revised accordingly. With respect to Indian River County Fire Rescue Station 7, the mileage appears accurate.

2. (Advisory) Staff agrees with FPL attorney Michael Tommaro's email to Indian River County staff dated September 30, 2015 wherein he suggests: 1) a conference call with Indian River County risk management representative and 2) a future ILA (inter-local agreement) for reimbursement related to special emergency services.

Utility Services/Water Supply (Utility Services Director Vincent Burke 772-226-1830)

1. Figure 1 under Appendix 10.9 should identify "Indian River County".
2. Figure 4.5-1, it appears the water balance from the cooling tower may be a typographical error (466000).
3. Wastewater from the water treatment system will be routed to the injection wells. As noted in the water balance on Figure 4.5-1, the peak short duration industrial wastewater sent to injection well from water plant is estimated to be 8.68MGD when 11 MGD is being pulled from the UFA. This is very close to a single pass through scenario.
4. Sample flows for domestic sanitary uses are shown on 4-16; therefore, the industrial/ process WW flows (aka water plant effluent) should also be noted in the body of the text as well (i.e. Average injection 1.92MGD, max month of 2.33MGD & 8.68MGD Peak).
5. Figure 8 under Appendix 10.9 should be extended to show the impacts of the 1-foot drawdown contour.
6. Also, if the 1-foot drawdown contour is to extend beyond the ECFS groundwater model, is it accurate to only use the subject model or should it be combined with the SEC model (which covers the east portion of Indian River County)?
7. When firing ULSD oil, when natural gas is not used, emissions of NOx will be controlled using water injection and SCR. How much additional water (process or treated) will be used in this effort?
8. "A supplemental SCA describing the solar facility layout, engineering design, drainage system, and construction specifications would be submitted prior to development of the future solar generation area of the Site." How much process/treated water, if any, will be used in the future solar panel array for cooling? If water will be used, will this future additional water be factored into the CUP allocation being requested now?
9. Cooling Towers
 - Cooling tower bactericides used in controlling microbial growth in the draft cooling tower should be evaluated to take into account drift that may affect neighbors, cattle, drivers on SR60, and visitors to the Fort Drum conservation area

- Cooling towers, evaporative condensers, and fluid coolers use a fan to move air through a recirculated water system. This allows a considerable amount of water vapor and sometimes droplets to be introduced into the surroundings, despite the presence of drift eliminators designed to limit droplet release. This water may be in the ideal temperature range for Legionnaires' disease bacteria (LDB) growth, 20°-50°C (68°-122°F). Good maintenance is necessary, both to control LDB growth and for effective operation. Does the report address either of these issues?
 - OCEC Unit 1 will utilize water from the UFA, with the expected water quality resulting in deposition ranging between 2.6 and 6 kg/ha/month within 2,000 meters of the cooling towers. These values are within the range of natural background deposition and are not anticipated to result in any adverse impacts to vegetation in the vicinity. Are these figures based on virgin process water or 5th cycle concentration?
10. If a regional WW facility becomes available at the OCEC, should connection of the facility to domestic WW be a condition of the certification/permit?
 11. Have OCEC's engineers looked at the feasibility of going to a "zero liquid discharge" system for the RO/NF concentrate (Water plant wastewater) such as the anion exchange system in use at Palm Coast Utilities?
 12. Section 5.3: What is the age of existing 10" artesian well? Please confirm the casing is in good shape and that there are no lateral leaks of artesian water.
 13. Section 5.3.1 states "Dewatering of the surficial aquifer will have no adverse impact on water levels or water supplies in the Upper Floridan Aquifer because the two aquifer systems are hydrologically separated by almost 300 feet of a clay-rich confining unit. What effect, if any, will the "dewatering of the SAS" have on the Fort Drum Marsh Conservation Area? As noted, the SJRWMD's Fort Drum Marsh Conservation Area is located adjacent to the Site, on the eastern boundary.
 14. Section 6.8 should list IRC Utilities which has 1MGD reuse available now. Transmission logistics from IRC to OCEC remain (to be determined).
 15. Report states "Additionally, using groundwater with higher chloride concentrations could reduce acceptable cooling tower cycles of concentration which in turn would increase the amount of groundwater withdrawals required for makeup and increase the discharge rate to the injection wells." Agreed, but additional process treatment technologies exist that can lessen chloride concentrations prior to cooling tower use. Has use of such technologies been considered?

Planning (Community Development Director Stan Boling, AICP 772-226-1253)

There are no planning-related issues with respect to the subject certification application.

(Advisory) Staff acknowledges that FPL is working with the County on an impact fee issue that is subject to the FPL/IRC franchise agreement and on a future ILA regarding special emergency services. It is staff's understanding that these issues will be addressed by mutual agreement prior to commencement of project construction.

Again, Indian River County staff appreciates the opportunity to review and comment. If you have any questions, please do not hesitate to contact me at (772) 226-1253.

Sincerely,



Stan Boling, AICP
Community Development Director, Indian River County

cc: Board of County Commissioners (via e-mail)
Joe Baird, County Administrator (via e-mail)
Mike Zito, Assistant County Administrator (via e-mail)
Dylan Reingold, County Attorney (via e-mail)
Bill DeBraal, Deputy County Attorney (via e-mail)
Jason Brown (via e-mail)
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Mike Busha, Treasure Coast Regional Planning Council (via e-mail)