



RICHARD T. CROTTY
ORANGE COUNTY PROPERTY APPRAISER
100 East Pine Street, 2nd Floor
Orlando, Florida 32801-2799

October 26, 1995

Department of Environmental Protection
Margorie Stoneman Douglas Building
Attention Hamilton S. Oven
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Regarding: Assessment of Pollution Control Equipment

Dear Mr. Oven,

Pursuant to Florida Statute 193.621 and Ad Valorem Tax Assessment Rules Chapter 62-8, please review the attached materials and advise me as to the eligibility of the proposed pollution control equipment.

This taxpayer has a Value Adjustment Board hearing and your recommendation will assist us in resolving this matter.

Please note for your records that our mailing address will be changing effective October 30, 1995 to 200 S. Orange Av. 17th Floor, Tangible Personal Property Orlando, Florida 32801 - 3438

Sincerely Yours,

John L. Witcher C.F.E.
Assistant Director, Taxpayer Services

Attachment:

1. Florida certified engineer's report
2. Listing of equipment
3. DR492

Tax Department
Air Products and Chemicals, Inc.
7201 Hamilton Boulevard
Allentown, PA 18195-1501
Telephone (610) 481-7778
Fax (610) 481-8555



VIA FEDERAL EXPRESS

25 October 1995

**Mr. John Witcher
Orange County Property Assessor
Second Floor
100 East Pine Street
Orlando, FL 32801**

Dear Mr. Witcher:

Re: Orlando CoGen - Pollution Assets

As requested, I am enclosing a statement prepared by Mr. William DeLaurentis, a Florida certified engineer, concerning the equipment previously submitted as pollution control. It is my understanding that this information will be forwarded to the Department of Environmental Protection for a determination as to its classification as pollution control equipment.

Thank you for your efforts in resolving this issue. If you have any further questions, please feel free to contact me. I look forward to seeing you in a few months to discuss the 1996 valuations.

Respectfully yours,

A handwritten signature in blue ink, appearing to read "J. L. Cernobyl Jr.", written in a cursive style.

**J. L. Cernobyl Jr.
Supervisor, Property Tax
(610) 481-8558**

Enclosure
pdu:n:\jle\witcher.doc

Raytheon
Engineers & Constructors

96320.001

October 24, 1995

Mr. J. L. Cernobyl
Supervisor Property Taxes
Air Products & Chemicals Inc.
7201 Hamilton Blvd.
Allentown, PA 18195

Dear Sir,

I have reviewed the equipment listed on Attachment A which is installed at the Orlando Cogen Limited, L.P. (OCL) Cogeneration Facility in Orlando, Florida. It is my opinion that the equipment listed was selected and is used for the express purpose of controlling pollution. This opinion is supported by the following:

Air Pollution Control Equipment

The OCL facility utilizes an advanced dry low NOx combustion technology to constrain the formation of nitrogen oxides. The components listed as items 1, 2, 6, 7, 10.1, 10.2 and portions of 8 and 9 are part of the low NOx combustion control system.

Specifically, items 1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.7, and 10.2 are components of the EV LO NOx Combustion System including its installation and adjustment for performance. Items 2 and 10.2 and a portion of items 8 and 9 are required for CEMS.

Other items which are also part of the air pollution control equipment include the HRSG stack (item 6) which is required for the dispersion of NOx and other trace pollutants and the piling (item 7) which was installed to facilitate the future retrofit of a Selective Catalytic Reduction (SCR) System should the need arise. In the case of the piling, pre-installation was necessary so as not to preclude the installation of an SCR at some future time.

Effluent Water Treatment Equipment

Items 3, 4, 5, 10.3 and the remaining portions of items 8 and 9 are required to collect the facility effluent water, remove oil and grease from the effluent water stream and ensure that the pH is within permit limits.

2847CWP(1)

Page 2
Mr. Cernobyl
October 24, 1995

If there are any further questions in this matter, please feel free to contact me at the address above.

Very truly yours,



William L. DeLaurentis
Florida P.E. License No. PE 46497

WLD/cld

Attachment



PE No 46497
10/24/95

ATTACHMENT A

POLLUTION CONTROL EQUIPMENT

1. EV LO NO_x Combustion System

- 1.1 Six (6) high performance burner control valves
- 1.2 Thirty-six (36) additional burners
- 1.3 EV burner heat shield (upgrade versus conventional single silo burner heat shield)
- 1.4 Stainless steel natural gas piping and valves to additional burners.
- 1.5 Combustion controls hardware and software for EV LO NO_x system.
- 1.6 Incremental field technical service for commissioning of the EV LO NO_x combustion control system.
- 1.7 Incremental field technical service to adjust burners and controls for low NO_x and for guarantee of 15 ppm NO_x (previous baseline was 25 ppm).

2. Continuous Emissions Monitoring System (CEMS)

3. Oil/Water Separator

Removes oil from waste water prior to discharge to the sewer.

4. Oily Drains Lift Pumps

5. Neutralization Waste Transfer Pumps

6. Heat Recovery Steam Generator (HRSG) Stack

The top 35 feet are needed for dispersion.

7. Piling

Pre-installed to facilitate the future addition of a selective catalytic reduction system (SCR) if required at a future date.

8. Foundations

For CEMS Building and Neutralization Pit

9. Mechanical Installation

For CEMS Building, Oil/Water Separator and related pumps, Neutralized Waste Transfer Pump, HRSG Stack Extension.

10. Field Electrical Construction

- 10.1 Installation of CEMS equipment, wiring, conduit, instrument tubing.
- 10.2 EV LO NO_x burner control valves and instrumentation, power and control wiring and conduit.
- 10.3 Instruments, controls, wiring, conduit, etc. for wastewater processing pumps and the Oil/Water Separator.

POLLUTION EQUIPMENT: Orlando CoGen Facility

1. EV LO NOx Combustion System (included in Section 01.30)

The EV LO NOx Combustion System represents additional investment for pollution control, relative to the standard ABB GT IINI single silo combustor.

The EV LO NOx combustor makes use of 37 individual combustion burners, grouped into six separately controlled "rings."

Incremental costs for the six (6) ring control valves and control instruments; and for an additional 36 burners is considered to be solely for pollution control. The EV LO NOx combustor top heat shield which supports the burners and manifolds the combustion air to the individual burner is more complex and costly than a standard GT IIN combustor. The incremental costs for the EV LO NOx heat shield is also part of the EV LO NOx system.

Costs for Equipment and Vendor Labor (Section 01.30)

-Six (6) high performance burner control valves @ \$20,000/valve	\$120,000
-Thirty-six (36) additional burners @ \$20,000 per burner	\$720,000
-Incremental cost increase for EV LO NOx combustor heat shield	\$800,000
-Additional natural piping (stainless steel) and manual valves	\$75,000
-Combustion controls (hardware and software for EV LO NOx)	\$150,000
-Field technicians for EV burners relative to the standard combustor	\$40,000
-Field technician service to adjust burners for low NOx and for guarantee of 15 PPM NOx to get from 25 pp	<u>\$225,000</u>
	\$1,630,000
2. Continuous Emissions Monitoring Equipment (Section 12.20)	\$153,535
3. <u>Oil/Water Separator (Section 14.50)</u> Cleans up wastewater prior to discharge to server	\$15,014
4. Oily Drains Lift Pumps (Section 14.51)	\$11,550
5. Neutralization Waste Transfer Pump (Section 14.70)	\$7,299
6. HRSG (top 35' needed for dispersion) (included in Section 22.10)	\$35,000

7.	Piling (in Section 30.30) installed for future addition of selective catalytic reduction (SCR) if required at a future date	\$30,000
8.	Foundations for CEMS Building and Neutralization Pit (31.00)	\$15,000
9.	Mechanical (included in Section 34.40) installation of CEMS Building, Oil/Water Separator Pump, Neutralized Waste Transfer Pump, stack extension	\$60,000
10.	<u>A/G Electrical (included in 36.10)</u>	\$85,000
	-Installation of CEMS, wiring, conduit, tubing	\$35,000
	-EV burner, control valves and instruments - power and control wiring on conduit	\$20,000
	-Wastewater processing pumps and oil/water separator	\$30,000

DR-482
R. 6/83

RETURN OF POLLUTION CONTROL DEVICES FOR AD VALOREM TAX PURPOSES

FLORIDA STATUTES CHAPTER 193.421

To the Property Appraiser Richard T. Croft

County, Florida, Orange

Return is hereby made for the assessment of the following described property under Florida Statutes as pollution control devices.

Description of Property

See Attached Schedule

Description of Facility

Copiersation facility

Name and address of owner:

The undersigned taxpayer hereby agrees to furnish such other reasonable information as the Appraiser may request in regard to the assessment requested herein.

Taxpayer's Signature

[Signature]

This form must be filed with the County Property Appraiser before April 1st.

ORIGINAL TO BE RETAINED BY PROPERTY APPRAISER
COPY TO BE GIVEN TO TAXPAYER



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

October 12, 1995

Mr. Richard T. Crotty
Orange County Property Appraiser
100 East Pine Street
Orlando, Florida 32801-2799

Attention: John L. Witcher

Re: Assessment of Pollution Control Equipment - Orlando Cogen Limited,
Air Products and Chemicals

Dear Mr. Crotty:

I have reviewed the materials faxed to me on October 10, 1995, concerning Orlando Cogen Limited's request for relief from ad valorem taxes. The material provide satisfies the requirements of Chapter 62-8, Florida Administrative Code. The Department has determined that the equipment listed for the Low Nox combustion system and other equipment listed as pollution equipment is eligible for assessment as pollution control equipment pursuant to ss. 193.621, Florida Statutes with one exception. Item 10., the piling installed for a future selective catalytic reduction system is not now supporting a pollution control activity. If an SCR system should ever be installed, the piling one then become eligible.

If you have any questions, I may be contacted at (904) 487-0472.

Sincerely,

Hamilton S. Oven, P.E.



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

October 12, 1994

Mr. J. L. Cernobyl, Jr.
Supervisor, Property Tax
Air Products and Chemicals, Inc.
7201 Hamilton Boulevard
Allentown, PA 18195-1501

DELIVERY VIA FACSIMILE TELECOPIER TO (610)481-8555

Dear Mr. Cernobyl:

This is in reply to your recent inquiry as to whether an "EV LO NOx Combustion System" may be considered to be pollution control equipment.

I have discussed this matter with engineers in the Department's Division of Air Resources Management and it is their opinion that burners designed to combust fuel in such a manner that results in lowered emissions of nitrogen oxides (NOx), compared to conventional burners, are properly considered to be pollution control equipment.

The engineers explained that a trend in modern industrial technology seeks to reduce or eliminate the need for post combustion pollution control devices by optimizing the burning of fuel at the front end of the process, thereby resulting in lowered emissions of pollutants and a reduced requirement for emissions control. Furthermore, the Department includes such up front technology as a low NOx burner in its review when determining what constitutes "best available control technology" for a given source of air pollution. The Division of Air Resources Management, in fact, encourages the use of such low NOx burner technology, where appropriate, for industry to meet its applicable emissions limitations.

If you have any further questions please feel free to contact the Division of Air Resources Management at (904) 488-1344.

Sincerely yours,

Henry Estévez
Assistant General Counsel

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

POLLUTION EQUIPMENT:**1. EV LO NOx Combustion System (included in Section 01.30)**

The EV LO NOx Combustion System represents additional investment for pollution control, relative to the standard ABB GT IINI single silo combustor.

The EV LO NOx combustor makes use of 37 individual combustion burners, grouped into six separately controlled "rings".

Incremental costs for the six (6) ring control valves and control instruments; and for an additional 36 burners is considered to be solely for pollution control. The EV LO NOx combustor top heat shield which supports the burners and manifolds the combustion air to the individual burner is more complex and costly than a standard GT IIN combustor. The incremental costs for the EV LO NOx heat shield is also part of the EV LO NOx system.

Costs for Equipment and Vendor Labor (Section 01.30)

-Six (6) high performance burner control valves @ \$20,000/valve	\$120,000
-Thirty-six (36) additional burners @ \$20,000 per burner	\$720,000
-Incremental cost increase for EV LO NOx combustor heat shield	\$300,000
-Additional natural piping (stainless steel) and manual valves	\$75,000
-Combustion controls (hardware and software for EV LO NOx)	\$150,000
-Field technicians for EV burners relative to the standard combustor	\$40,000
-Field technician service to adjust burners for low NOx and for guarantee of 15 PPM NOx to get from 25 pp	<u>\$225,000</u>
	\$1,630,000

- | | | |
|----|--|-----------|
| 2. | <u>Cost for Gas Turbine Air Intake Silencer</u>
Incremental cost over simple air intake ducting | \$40,000 |
| 3. | Continuous Emissions Monitoring Equipment (Section 12.20) | \$153,535 |
| 4. | <u>Oil/Water Separator (Section 14.50)</u>
Cleans up wastewater prior to discharge to sewer | \$15,014 |

5.	Oily Drains Lift Pumps (Section 14.51)	\$11,550
6.	Neutralization Waste Transfer Pump (Section 14.70)	\$7,299
7.	Steam Vent Valve Silencers (Sections 21.50 and 21.51)	\$57,492
8.	HRSG Stack Silencer (included in Section 22.10)	\$46,000
9.	HRSG (top 35' needed for dispersion) (included in Section 22.10)	\$35,000
10.	Piling (in section 30.30) installed for future addition of selective catalytic reduction (SCR) if required at a future date	\$30,000
11.	Foundations for CEMS Building and Neutralization Pit (31.00)	\$15,000
12.	Structural Steel to support steam vent valve silencer (included in 32.10)	\$15,000
13.	Noise attenuation insulators in turbine/generator (included in 32.40)	\$25,000
14.	Low noise louvers in T/G Building (included in 32.40)	\$31,098
15.	Mechanical (included in Section 34.40) installation of CEMS Building, Oil Water Separator Pump, Neutralized Waste Transfer Pump, stack extension, stack silencer, steam vent silencer	\$70,000
16.	<u>A/G Electrical (included in 36.10)</u>	\$85,000
	-Installation of CEMS, wiring, conduit, tubing	\$35,000
	-EV burner, control valves and instruments - power and control wiring on conduit	\$20,000
	-Waste water processing pumps and oil/water separator	\$30,000



RICHARD T. CROTTY
ORANGE COUNTY PROPERTY APPRAISER
100 East Pine Street, 2nd Floor
Orlando, Florida 32801-2799

October 6, 1995

DEPARTMENT OF
ENVIRONMENTAL PROTECTION

OCT 10 1995

SITING COORDINATION

Department of Environmental Protection
Margorie Stoneman Douglas Building
Attention Hamilton S. Oven
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Regarding: Assessment of Pollution Control Equipment

Dear Mr. Oven,

Thank you for your recent help in determining the eligibility of a local uniform company's pollution control status pursuant to Chapter 62-8, Florida Administrative Code. I appreciate your assistance and the prompt attention you gave that matter.

As a contact person within the Department of Environmental Protection I am forwarding a copy of a letter signed by Henry Estevz Assistant General Counsel Department of Environmental Protection which is addressed to Mr J. L. Cernobyl, Jr. Supervisor, Property Tax for Air Products and Chemicals, Inc. This letter was presented to the Value Adjustment Board in 1994. I read this letter to you yesterday during my phone conversation with you. Prior to speaking with you I spoke with Mr Cernobyl and asked that he consider requesting the Value Adjustment Board to reschedule his October 13th case of this year to the last available convenient hearing date in order to allow time for him to submit the required documentation to our office. If he were able to do so, we would in turn pursuant to Florida Chapter 193.621(8) and Chapter 62-8 Florida Administrative code submit the proper materials and documentation to you so that you could make a determination for 1995.

I am writing today to ask that you review Mr. Estevez's letter. I would like to know if Mr Estevez's letter in any way officially satisfies the Department of Environmental Protection's requirements that would allow Orange County to consider Orlando Cogen Limited, L.P.'s "EV LO Nox Combustion System" to be assessed as pollution control equipment.

This case, if not postponed is set to be heard on October 13, 1995. I would appreciate a response as soon as possible. If you have any questions please feel free to contact me at (407) 836-5049.

Sincerely Yours,

John L. Witcher C.F.E.
Assistant Director, Taxpayer Services

Attachment:

Copy of Department of Environmental Protection Letter dated October 12, 1994