



Florida Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

6/14/2011

Justin Edwards, CFE
Office Operations Supervisor
Putnam County Property Appraiser
P.O. Box 1920
Palatka, Florida 32178

Re: Florida Power & Light Company (FPL) - Putnam Power Plant
Pollution Control Devices

Dear Mr. Edwards:

In accordance with Section 193.621, Florida Statutes (F.S.), if it becomes necessary for a manufacturing or industrial plant or installation to install or construct a facility in order to eliminate or reduce industrial air or water pollution, those facilities shall be deemed to have value, for purposes of assessment for ad valorem property taxes, no greater than their market value as salvage. Only those facilities specifically installed to eliminate or reduce air or water pollution are eligible for this type of assessment.

I have reviewed the material attached to your letter dated May 23, 2011, concerning pollution control devices at the Putnam Power Plant. In my opinion, the items on the equipment list submitted by FPL (attached) are “primarily for the purpose of pollution control” and are eligible for assessment as pollution control devices pursuant to Section 193.621, F.S., with the following exceptions:

- Inlet Fogger System – Inlet fogger systems are designed to enhance the performance of a combustion turbine during hot days. The primary purpose of this equipment is arguably not pollution control.
- Noise Abatement Equipment – This does not fall into the category of air or water pollution control equipment.
- Cooling Tower System – Cooling towers are primarily for the purpose of removing heat from the condensers.
- Raw Water Supply and Demineralized Water Systems – These systems likely provide other uses at the facility such as boiler make-up and/or potable uses. I recommend asking FPL to submit more details that clearly identify what portion (%) of each system is used for the air emission control system.

FPL Putnam Plant

6/14/2011

Page 2 of 2

If you have any questions regarding this determination, please contact me at (850) 245-2175.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cindy Mulkey", with a large, sweeping loop at the end.

Cindy Mulkey
Administrator,
Siting Coordination Office

Enclosure: FPL Putnam Power Plant Pollution Control Equipment List

This is to certify that, to the best of my knowledge and belief, the listed facilities/ systems at the **FPL Putnam Plant** are primarily used to provide the following pollution control functions:

FACILITY/ SYSTEM	SYSTEM DESCRIPTION	POLLUTION CONTROL FUNCTION
Air Emission Control Systems	Stack • CEM-computer microprocessor • Analyzer, Opacity • Emission Monitoring Analyzer	System monitors various air emissions to help ensure compliance with State and Federal air emission standards. The Continuous Emission Monitoring System (CEMS) is a requirement of the Clean Air Act Amendments of 1990.
	Continuous Emission Monitoring System • (CEMS) Building	
	H.R.S.G. Enclosures • Emission Monitoring System • Emission Monitoring Analyzer • CEMS Computer/ Microprocessor	
	H.R.S.G. Enclosures • Afterburner	Provides control of visible NO ₂ plume.
	Air Intake System • Inlet Fogger System	System controls NO _x .
	NOX Control Equipment • Control/Instrumentation	
	Demineralized Water System • Control/Instrumentation • Drive, Electric Motor • Tank • Foundation • Ion Exchanger, Complete • Piping • Pump, Complete	
	Raw Water Supply System • Foundation • Raw Water Well	
	Water Treatment System • Control/Instrumentation • Water Treatment Equipment • Piping	
	Water Injection System • Water Injection System Equipment	

FACILITY/ SYSTEM	SYSTEM DESCRIPTION	POLLUTION CONTROL FUNCTION
Fuel/Oil/Chemical Spill Containment/Prevention	Oil/Paint Storage Building (J) • Superstructure • Roof • Fire Protection System • Lighting System Complete • Substructure/Foundation	Provides spill containment/protection for the storage of oil/paint.
	Diesel (Light) Oil Supply System • Retaining Enclosure	
	Light/Diesel Oil Storage System • Liner, Complete • Dike or Dam (Other) • Dike or Dam Liner • Cathodic Protection Equipment	Includes items such as storage tank containment dikes and tank liners that provide spill containment/protection.
	Light/Diesel Storage System • Cathodic Protection	
	Fuel Oil/Gas Transfer System • Cathodic Protection	
	Fuel Oil/Gas Transfer System • Piping Encasement	
	Heavy Fuel Oil/Gas Unloading Station • Oil Spill Equipment (Major)	Provides for containment of potential oil spill/leaks.
Noise Abatement Equipment	Industrial Gas Turbine • Acoustical Enclosure	Includes items such as silencers/mufflers and enclosures that provide noise abatement for the subject systems.
	H.R.S.G. Enclosures • HRSG Aux Equipment Enclosure	
	Air Intake System • Silencer/Muffler	
Industrial Wastewater Treatment System	Ponds (not cooling) • Pump, Complete • Liner, Complete • Pond	System captures and treats industrial waste streams, and storm water runoff from equipment and power block areas.

FACILITY/ SYSTEM	SYSTEM DESCRIPTION	POLLUTION CONTROL FUNCTION
Industrial Wastewater Treatment System (Continued)	Wastewater Treatment System • Control/Instrumentation System • Tank • Foundation • Piping • Waste water treatment equipment • Valve, Power Operated 8 in or Greater • Cathodic Protection Equipment • Pump, Complete • Drive, Electric Motor, Complete	System captures and treats industrial waste streams, and storm water runoff from equipment and power block areas.
Cooling Tower System	Cooling Tower • Drive, Electric Motor, Complete • Fan/Blower, Complete • Foundation • Salt Drift eliminators • Piping • Tank • Superstructure • Trays, Packing Complete • Motor Rotating Assembly • Motor Stationary Winding • Pump Complete • Water Distribution System	System mitigates thermal impacts through heat dissipation.
	Cooling Tower Make-up System • Control/Instrumentation System • Drive, Electric Motor, Complete • Piping • Pump, Complete • Valve, Power Operated 8 Inch or Greater	

Harold A. Frediani, Jr.
Signature

Name: Harold A. Frediani, Jr.
Golder Associates Inc. Certificate of Authorization No: 1670
Florida Registration No. 36394
Date: March 25, 2011

