



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

November 29, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Paul H. Barrett,
General Manager
White Springs Agricultural Chemicals, Inc.
Post Office Box 300
White Springs, Florida 32096

Re: DEP File No. 0470002-052-AC
Pipe Reactor on 'Z' Train (MAP/DAP Plant)
Suwannee River Complex

Dear Mr. Barrett:

The Department received the response to our letter of October 18, 2004 for installing pipe reactor on 'Z' Train. Based on our review of the response for the proposed project, we have determined that additional information is needed in order to continue processing this application package. Please submit the information requested below to the Department's Bureau of Air Regulation:

1. The response states that the proposed project will involve installing two pipe reactors in parallel. In doing research for this project, the Department determined that there are various forms of pipe reactor technology with the main purpose of effective use of the heat of reaction and heat distribution methodology for energy efficiency. The purpose of variations is to enable flexibility of various grades of fertilizers. Please explain where the two parallel pipe reactors will be installed and the advantages of installing the pipe reactors there.
2. The Department also determined that the major advantage of pipe reactor technology is reduced moisture input, lower solid recycle ratio thus giving higher capacity compared to a tank reactor. Please provide the Department MAP production data for the last five years. The Department may impose a condition to restrict future production at those levels.

Any additional comments from the Northeast District Office will be forwarded to you after we receive them.

The Department will resume processing this application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. A new certification statement by the authorized representative or responsible official must accompany

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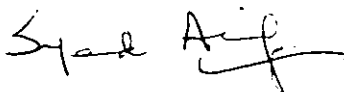
Mr. Paul H. Barrett
November 29, 2004
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any material changes to the application. Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

Please note that in accordance with Rule 62-4.055(1), "The applicant shall have **ninety days** after the Department mails a timely request for additional information to submit that information to the Department..... Failure of an applicant to provide the timely requested information by the applicable date **shall** result in denial of the application."

We will be happy to meet and discuss the details with you and your staff. I may be contacted at 850/921-9528.

Sincerely,

A handwritten signature in black ink that reads "Syed Arif". The signature is written in a cursive style with a long horizontal stroke at the end.

Syed Arif, P.E.
Permitting North Section
Bureau of Air Regulation

cc: C. B. Pults, WSAC, Inc.
C. Kirts, DEP-NED
J. Koogler, Ph.D., P.E., Koogler & Associates

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1. Article Addressed to:
 Mr. Paul Barrett, General Manager
 White Springs Agricultural
 Chemicals, Inc.
 Post Office Box 300
 White Springs, Florida 32096

2. Arti
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 White Springs Agricultural Chemicals
 Post Office Box 300
 White Springs, Florida 32096