

PCS
Phosphate



WHITE SPRINGS

P.O. BOX 300, WHITE SPRINGS, FL 32096 DIRECT: (386) 397-8101 FAX: (386) 397-8103

September 22, 2008

Mr. Syed Arif, P.E.
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Rd
Tallahassee, FL 32399-2400

RECEIVED

SEP 25 2008

Subject: Permit Extension Request
White Springs Agricultural Chemicals, Inc
File No: 0470002-39-AC, PSD-FL-297

BUREAU OF AIR REGULATION

Dear Mr. Arif:

0470002-063-AC / PSD-FL-297B

This is a follow up to recent discussions with Rita Felton-Smith and you regarding an extension of the above referenced permit from December 31, 2008 to December 31, 2009. The additional time will allow completion of the replacement of the North Filter Pans at the "B" Phosphoric Acid Plant (EU 020) located at White Springs Agricultural Chemicals' facility in Hamilton County.

The proposed replacement of the North Filter Pans was initially expected to occur no earlier than 2010 due to budget constraints (see enclosed letter dated October 8, 2007). Based on a two year gap between completion of the replacement of the South Filter Pans in mid-2008 and the projected replacement date for the North Filter Pans, FDEP suggested submitting a separate construction permit application for the North Filter Pan replacement. However, since the installation of the North Filter Pans is now proposed for mid-2009, the time frame is well within what FDEP would consider reasonable for extension of the existing PSD permit.

Please note that all references under the "B" Phosphoric Acid Plant for the "A" Phosphoric Acid Plant components are being deleted from the Title V. PCS has determined that the "A" Phosphoric Acid Plant components will not be required for future operations. A letter requesting this change, as part of the revisions to the existing Title V (060-AV Draft), has been sent to the NED of FDEP. For more information on this aspect, as originally proposed, please refer to CP-2 (enclosed).

This project has been reviewed and approved by our management. Final approval to expend the necessary funds will be determined at the Potash Corp Board of Directors meeting in November. Following approval by the Board, and pending approval of this extension request by the Department, we will begin ordering the necessary equipment.

The material for this project is custom fabricated and has a significant lead time. We will place our order as soon as all the necessary approvals are received. Fabrication is expected to take approximately six months. Once the fabrication is complete the new pans will be installed during a scheduled plant turn-around. We currently anticipate that this will occur in June 2009.

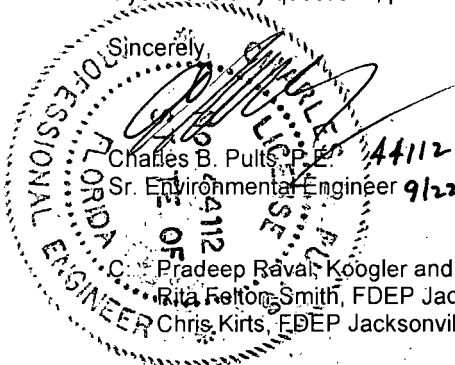
If you have any questions, please call me at 386-397-8442 or email at cpults@pcsphosphate.com.

Sincerely,

Charles B. Pults, P.E.
Sr. Environmental Engineer 9/22/08

Pradeep Raval, Koogler and Associates, Inc.
Rita Felton-Smith, FDEP Jacksonville
Chris Kirts, FDEP Jacksonville

W. K. Thornton
General Manager



Livingston, Sylvia

From: Livingston, Sylvia
Sent: Tuesday, September 30, 2008 4:20 PM
To: 'forney.kathleen@epa.gov'; 'Abrams.Heather@epamail.epa.gov'
Cc: Felton-Smith, Rita; 'catherine_collins@fws.gov'; 'peter_courtney@dnr.state.ga.us'; Walker, Elizabeth (AIR); Arif, Syed
Subject: White Springs Agricultural Chemicals, Inc. - 0470002-063-AC/ PSD-FL-297B

A new **Permit Application** has been received in Florida and is currently under review.

Link to Permit Application Documents:

<http://arm-permit2k.dep.state.fl.us/psd/0470002/00003122.pdf>

ARMS PA Project ID:	0470002-063-AC
	PSD-FL-297B

Facility Name:	WHITE SPRINGS AGRICULTURAL CHEMICALS,INC
Florida County:	Hamilton
Project Description:	EXTENSION OF 0470002-039-AC
Permit Application Processor:	Syed Arif
Processor Phone:	(850)921-9528
Processor Email Address:	Syed.Arif@dep.state.fl.us

Or, Search for other Air Permit Documents on [Florida's Air Permit Documents Search](#).

Please direct any questions regarding this permit application to the permit application processor. If you have any problems accessing these documents please let me know.

Thanks,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-0771
sylvia.livingston@dep.state.fl.us

Tracking:	Recipient	Delivery
	'forney.kathleen@epa.gov'	
	'Abrams.Heather@epamail.epa.gov'	
	Felton-Smith, Rita	Delivered: 9/30/2008 4:20 PM
	'catherine_collins@fws.gov'	
	'peter_courtney@dnr.state.ga.us'	
	Walker, Elizabeth (AIR)	Delivered: 9/30/2008 4:20 PM
	Arif, Syed	Delivered: 9/30/2008 4:20 PM



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

October 16, 2008

Electronically Sent - Received Receipt Requested

wkthornton@pcsphosphate.com

Mr. W.K. Thornton, General Manager
PCS Phosphate
Post Office Box 300
White Springs, Florida 32096-0300

Re: Extension Request/DEP File No. 0470002-063-AC (PSD-FL-297C)
White Springs Agricultural Chemicals, Inc.

Dear Mr. Thornton:

The Department reviewed your request of September 22, 2008 to extend the expiration date of the above referenced construction permit from December 31, 2008 to December 31, 2009. The additional time will allow completion of the replacement of the North Filter Pans at the 'B' Phosphoric Acid Plant (EU 020) at the Suwannee River Complex in Hamilton County.

Per Rule 62-4.080(3), Florida Administrative Code (F.A.C.), an extension for a construction permit shall be granted if the applicant can demonstrate reasonable assurances that upon completion, the extended permit will comply with the standards and conditions required by applicable regulation.

We already have fairly extensive information about the facility and the control equipment. To complete the reasonable assurance requirement allowing extension of the permit, please submit the following information:

1. The letter refers to two different enclosures which were not submitted with the request. Please submit the two enclosure documents.
2. The letter states that the project of replacing the North Filter Pans has been reviewed and approved by the Management. Final approval to expend the necessary funds will be determined at the Potash Corporation Board of Directors meeting in November. Please submit the necessary documents to show approval by the Management for replacing the North Filter Pans. Additionally, submit the final approval by the Potash Corporation Board of Directors to expend the necessary funds when it gets approved in November 2008. The Department will make a determination of extending the construction permit once all the requested approval documents have been submitted by PCS.

3. Please provide documentation that shows when the last construction activity took place at the 'B' Phosphoric Acid Plant or other projects related to PSD-FL-297. The Department needs to make a determination that there was not a delay of more than 18 months in either commencing construction or any break in construction activities for all the emission units that underwent modification.
4. Please provide a detailed project and construction schedule if the funds are approved by the Board of Directors in November 2008.

According to Rule 62-4.080(3), F.A.C. the permit will remain in effect until the Department takes final action. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If you have any questions regarding this matter, please call me at 850/921-9528.

Sincerely,



Syed Arif, P.E.

New Source Review Section

cc: Rita Felton-Smith, DEP-NED rita.felton-smith@dep.state.fl.us
Charlie Pults, PCS Phosphate cpults@pcsposphate.com
Pradeep Raval, Koogler & Associates praval@kooglerassociates.com

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Thursday, October 16, 2008 8:57 AM
To: 'wkthornton@pcosphosphate.com'
Cc: Felton-Smith, Rita; 'cpults@pcosphosphate.com'; 'praval@kooglerassociates.com'
Subject: RAI -0470002-063-AC/PSD-FL-297C (PCS Phosphate- White Springs Agricultural Chemicals, Inc.)

Attachments: 0470002-063-AC.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html>> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-0771
sylvia.livingston@dep.state.fl.us



0470002-063-AC.p
df (461 KB)

Tracking:

Recipient	Read
✓ 'wkthornton@pcosphosphate.com'	
✓ Felton-Smith, Rita	Read: 10/16/2008 9:04 AM
✓ 'cpults@pcosphosphate.com'	
✓ 'praval@kooglerassociates.com'	



0470002-063-AC.p
df (461 KB)

Tracking:

Recipient	Delivery	Read
✓ Arif, Syed	Delivered: 10/16/2008 9:07 AM	Read: 10/16/2008 9:20 AM
Walker, Elizabeth (AIR)	Delivered: 10/16/2008 9:07 AM	
✓ Gibson, Victoria	Delivered: 10/16/2008 9:07 AM	Read: 10/16/2008 9:07 AM

Livingston, Sylvia

From: wkthornton@pcsphosphate.com
Sent: Thursday, October 16, 2008 9:22 AM
To: Livingston, Sylvia
Cc: cpults@pcsphosphate.com; praval@kooglerassociates.com; Felton-Smith, Rita; sPosey@pcsphosphate.com
Subject: Re: RAI -0470002-063-AC/PSD-FL-297C (PCS Phosphate- White Springs Agricultural Chemicals, Inc.)
Attachments: 0470002-063-AC.pdf

I received the e-mail.
W.K. Thornton

"Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us>

10/16/08 08:58 AM

To <wkthornton@pcsphosphate.com>
cc "Felton-Smith, Rita" <Rita.Felton-Smith@dep.state.fl.us>,
<cpults@pcsphosphate.com>, <praval@kooglerassociates.com>
Subject **RAI -0470002-063-AC/PSD-FL-297C (PCS Phosphate- White Springs Agricultural Chemicals, Inc.)**

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Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-0771
sylvia.livingston@dep.state.fl.us

<<0470002-063-AC.pdf>>

10/16/2008

Livingston, Sylvia

From: cPults@pcsphosphate.com
Sent: Thursday, October 16, 2008 9:08 AM
To: Livingston, Sylvia
Subject: Re: RAI -0470002-063-AC/PSD-FL-297C (PCS Phosphate- White Springs Agricultural Chemicals, Inc.)

Got it.

Livingston, Sylvia

From: pradeep [praval@yahoo.com]
Sent: Thursday, October 16, 2008 10:06 AM
To: Livingston, Sylvia; wkthornton@pcsphosphate.com
Cc: Felton-Smith, Rita; cpults@pcsphosphate.com; praval@kooglerassociates.com
Subject: Re: RAI -0470002-063-AC/PSD-FL-297C (PCS Phosphate- White Springs Agricultural Chemicals, Inc.)

Sylvia, thanks, I got the RAI.

Regards, Pradeep.

--- "Livingston, Sylvia"
<Sylvia.Livingston@dep.state.fl.us> wrote:

> Dear Sir/Madam:
> Please send a "reply" message verifying receipt of the attached
> document(s); this may be done by selecting "Reply" on the menu bar of
> your e-mail software, noting that you can view the documents, and then
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> We must receive verification of receipt and your reply will preclude
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> The document(s) may require immediate action within a specified time
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>
> <<http://www.adobe.com/products/acrobat/readstep.html>>
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> of any changes to your e-mail address or that of the
> Engineer-of-Record.
> Thank you,
>
>
> Sylvia Livingston
> Bureau of Air Regulation
> Division of Air Resource Management (DARM)
> 850/921-0771
> sylvia.livingston@dep.state.fl.us
>
> <<0470002-063-AC.pdf>>
>
>
>
> The Department of Environmental
>
> Protection values your feedback as a customer. DEP
> Secretary Michael W. Sole is committed to
> continuously assessing and
>
> improving the level and quality of services provided
> to you. Please take a few minutes to comment on the
> quality of
>
> service you received. Copy the url below to a web
> browser to complete the DEP

PCS
Phosphate



WHITE SPRINGS

P.O. BOX 300, WHITE SPRINGS, FL 32096 DIRECT: (386) 397-8101 FAX: (386) 397-8103

January 6, 2009

Mr. Syed Arif, P.E.
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Rd
Tallahassee, FL 32399-2400

Subject: Permit Extension Request
White Springs Agricultural Chemicals, Inc
File No. 0470002-063-AC, PSD-FL-297C

Dear Mr. Arif:

This letter is in response to your letter of October 16, 2008, requesting additional information and assurances that the proposed work will go forward pending approval of the extension of the current PSD permit. There were four specific items to be addressed. They are as follows:

1. Two enclosures referenced in my letter of September 22, 2008, were missing. This was an oversight on my part. Enclosed are a copy of my letter of October 8, 2007, addressed to you and referencing a previous extension request, and a copy of Compliance Plan CP-2 from the Title V permit.
2. Documentation of PCS Board approval of this project. A copy of an internal memo dated December 31, 2008, referencing the Board's action and approval to move forward with this project is enclosed.
3. Documentation that shows when the last construction activity took place on this project and that there has not been a break in construction activity that has exceeded 18 months. The close-out of the work on the south filter (part of the work authorized under PSD-FL-297) took place in early July of 2008. A copy of the AFE Project Completion Report is enclosed. Based on the enclosed Gantt Chart (Item 4) and the Project Completion Report it can be established that there has not been a break in construction that exceeds 18 months.
4. A detailed project and construction schedule (Gantt Chart) is enclosed for the installation of the north filter pans.

If you have any questions, please call me at 386-397-8442 or email at cpults@pcsphosphate.com.

Sincerely,

Charles B. Pults, P.E.
Sr. Environmental Engineer

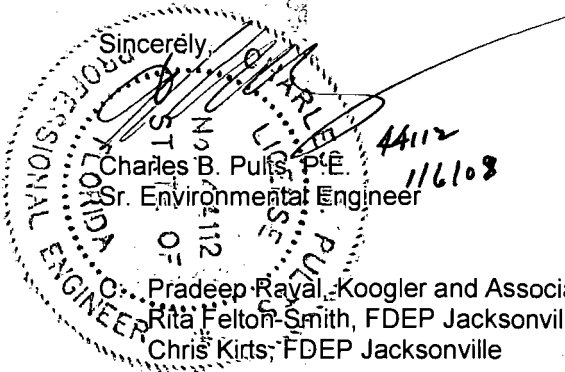
Pradeep Rayal, Koogler and Associates, Inc.
Rita Felton-Smith, FDEP Jacksonville
Chris Kirts, FDEP Jacksonville

Certified Mail
7007-2680-0002-8360-6933

RECEIVED

JAN 09 2009

BUREAU OF AIR REGULATION



W. K. Thornton
General Manager

October 8, 2007

Mr. Syed Arif, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Request for Extension of the Expiration Date
PSD-FL-297 (0470002-039-AC)

Dear Mr. Arif:

The Department's letter of July 17, 2006 extending the expiration date of the referenced permit to December 31, 2007 provided conditions that will allow the further extension of the expiration date to December 31, 2008. By this letter, WSA, Inc. is requesting the extension of the expiration date to December 31, 2008 to allow further work to be completed on the "B" Phosphoric Acid plant.

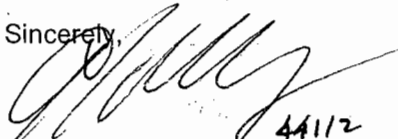
The letter cites three specific tasks to be completed during the current time extension. They are:

- Complete the refurbishment and tie-in of the "C" Plant scrubber – This is complete, the scrubber has been emission tested, and is working satisfactorily.
- Modify the pans on one filter to prevent slurry leakage at the pan to cloth attachment – We attempted a modification to correct this problem. It was determined that this was not a feasible project due to the condition of the pans.
- Study the installation of additional vacuum for the filters – This has been completed and each filter now has a primary and secondary vacuum system. This has improved filtration.

As you are aware, there are two phosphoric acid filters in use at the "B" Phosphoric Acid plant. The filter pans are large items with long lead times for ordering and installation. Additionally, they are expensive (~\$3MM each) which requires extensive justification and significant resources. We have corporate approval to purchase one set of pans for installation during the plant's turn-around next June. The extension through December, 2008 will allow us sufficient time to complete the installation, make any required adjustments, and complete appropriate testing. We do not anticipate approval to purchase the second set of pans until 2009 with installation occurring mid-year 2010.

If you have any questions concerning this request, please contact me at 386-397-8442 or by email at cpulsts@pcsphosphate.com.

Sincerely,


Charles B. Pults, P.E. 44112
Sr. Environmental Engineer 10/8/07



W. K. Thornton
General Manager

Compliance Plan CP-2
Title V Renewal 0470002-048-AV
And PSD-FL-297
Testing of B Phosphoric Acid Plant

Permit Nos. 0470002-039-AC (PSD-FL-297) and 0470002-053-AC (PSD-FL-297B) are incorporated into the Title V renewal project, 0470002-048-AV. All construction and testing has been completed except for B Phosphoric Acid Plant. All applicable conditions have been incorporated into project 048.

1. Within 45 days of B Phosphoric Acid Plant commencing operation, the permittee shall conduct all testing required by Permit No. 0470002-039-AC PSD-FL-297 for B Phosphoric Acid Plant. A permit modification revises conditions 11 and 20 to account for design changes authorized by 0470002-053-AC (PSD-FL-297B). The permittee shall comply with the following conditions regarding the required testing:

- a. The subject emission units shall be tested for compliance with the above emission limits in accordance with the requirements of Rule 62-297-.310, F.A.C. and methods in this permit. For the duration of all tests the emission unit shall be operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emission unit may be tested at less than permitted capacity (i.e., 90% of the maximum operating rate allowed by the permit); in this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.
- b. Phosphoric Acid Plant B: Phosphoric acid plant B is required to initially test both B and C stacks. The six combined runs will be required to be completed in the 5-day period, and may be performed sequentially, provided that each valid run is within 10% of the previously tested capacity. The combined emissions from both B and C stacks shall not exceed 1.2 lb/hour of fluoride. Until filtering commences at the A Phosphoric Acid Filters, annual compliance will be based on emissions from B and C stacks. Within 45 days of start up of the A phosphoric acid filters, the permittee shall conduct stack tests on stacks A, B, and C. The nine combined runs shall be completed in the 5-day period, and may be performed sequentially, provided that each valid run is within 10% of the previously tested capacity. The sum total of emissions from stacks A, B, and C shall not exceed the 1.2 lb/hour of fluoride. Upon startup of the A phosphoric acid filter, the permittee shall conduct annual testing of all three stacks during each federal fiscal year (October 1- September 30) to demonstrate compliance with the emissions standards.

[Rule 62-4.070(3) and 62-297.310, F.A.C.]

2. Stacks A, B, and C shall be subject to all process requirements of Phosphoric Acid Plant B. Phosphoric Acid Plants A and C will no longer produce phosphoric acid independently, however integral portions of both Phosphoric Acid Plants A and C will assist Phosphoric Acid Plant B to filter the phosphoric acid and control fluoride emissions. The Phosphoric Acid Plant A filter system, scrubber and stack will be used with B Phosphoric Acid Plant when additional filtering is required. Phosphoric Acid Plant A components will not operate independently or when Phosphoric Acid Plant B is not operating. Phosphoric Acid Plant C scrubber and stack will be used continuously with Phosphoric Acid Plant B to control emissions from the Phosphoric Acid Plant B production. Phosphoric Acid Plant C components will not operate independently or when Phosphoric Acid Plant B is not operating. The sum total of emissions from all three stacks (A, B,

and C) shall comply with the maximum daily average and annual operating rates in condition 3 and fluoride emission rate of 1.2 lb/hr and 3.6 tpy in condition 5 of this permit. Initial and annual testing must be in compliance with this permit. [Application No. 0470002-053-AC (PSD-FL-297B) and Rules 62-4.070(3) and 62-210.200, F.A.C. (Definitions - Potential Emissions)]

3. The permittee shall meet all the notification, testing and reporting requirements of Rule 62-297, F.A.C., 40 CFR 63 Subparts A (General Provisions) and AA (NESHAP for Phosphoric Acid Plants), and Alternate Sampling Plan 04-I-AP.

4. Once the permittee satisfactorily demonstrates compliance with the conditions of this Compliance Plan, compliance demonstrations shall resume in accordance with the specific conditions of the Title V permit.

Date December 31, 2008
To Distribution
From J. Fair
Subject AFE Approval – SRC Prayon North Filter Car Frame & Filter Pan Replacement

The above referenced AFE has been approved as a Major sustaining capital AFE for \$3,633,000. The AFE number is 092727. The capital entity is established on Marcam and is C09-2727. Please use the following work order number for all costs related to this AFE.

Work Order: **323031** All appropriate links are established between this work order number and the Marcam entity/account number for the AFE.

Total dollars in the amount of \$3,633,000 have been planned against the above work order as Task 01- Installation, and the work order is approved and ready for use. Changes may be made or additional numbers may be established as necessary.

The work order is approved and ready for use. Changes may be made or additional numbers may be established as necessary.

For auditing purposes equipment lists associated with this project must be documented as the project progresses and confirmed upon project completion. Please submit these data to the complex planner, C. Johnson in Accounting, and J. Fair in Engineering. Please feel free to call if you have any questions or need help (ext. 8476).

Distribution: I. S. Akly
R. Little
C. Johnson
M. Parden

cc: S. Beckel
B. Clarisse
S. Posey
B. Ruark
J. S. Thomson
K. Thornton
D. Townsend
J. Werner

SRC North Filter Car Frame and Filter Pan Replacement

ID	Task Name	Duration	Start	Finish	Predecessors	Timeline											
						Dec	1st Quarter			2nd Quarter			3rd Quarter			4th Quarter	
							Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
1	AFE Approval	2 wks	Thu 1/1/09	Wed 1/14/09			■										
2	Issue Purchase Order	2 wks	Thu 1/15/09	Wed 1/28/09	1		■										
3	Purchase Car Frame	189 days	Thu 1/29/09	Tue 10/20/09	2			■	■	■	■	■	■	■	■	■	■
4	Fabricate Car Frame	30 wks	Thu 1/29/09	Wed 8/26/09			■	■	■	■	■	■	■	■	■	■	■
5	Install Car Frame	14 days	Thu 10/1/09	Tue 10/20/09												■	■
6	Purchase Filter Pans	189 days	Thu 1/29/09	Tue 10/20/09	2			■	■	■	■	■	■	■	■	■	■
7	Fabricate Filter Pans	30 wks	Thu 1/29/09	Wed 8/26/09			■	■	■	■	■	■	■	■	■	■	■
8	Install Filter Pans	14 days	Thu 10/1/09	Tue 10/20/09												■	■
9	Purchase Level Track/ Turnover Track	189 days	Thu 1/29/09	Tue 10/20/09	2			■	■	■	■	■	■	■	■	■	■
10	Fabricate Level Track/Turnover Track	30 wks	Thu 1/29/09	Wed 8/26/09	2		■	■	■	■	■	■	■	■	■	■	■
11	Install Level Track/Turnover Track	14 days	Thu 10/1/09	Tue 10/20/09												■	■
12	SRC Filter Pan/Car Frame Turnaround	14 days	Thu 10/1/09	Tue 10/20/09												■	■
13	Remove/Replace Filter Components	14 days	Thu 10/1/09	Tue 10/20/09												■	■
14	Demo Old Filer Pans and Car Frame	21 days	Wed 10/21/09	Wed 11/18/09	13												■

Project: North Filter Pans and Car Fra
Date: Tue 1/6/09

Task		Progress		Summary		External Tasks		Deadline	
Split		Milestone		Project Summary		External Milestone			