

PINEY POINT



PHOSPHATES, INC.

*Copied
at 6/12/00
aglt*

RECEIVED

JUN 12 2000

BUREAU OF AIR REGULATION

**CERTIFIED/RETURN RECEIPT
NO. 7099 3400 0005 0933 8680**

8 June 2000

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000

Re: DEP File No. 0810002-004-AC (PSD-FL-242)
Piney Point Sulfuric Acid Plant

Dear Sir:

On 12 May 2000 Piney Point Phosphates, Inc. (PPP) received your letter concerning the above-referenced permit for construction/modification of the existing sulfuric acid plant at our Manatee County facility. In that letter you requested information concerning completion of this project and information pertaining to our plans to construct a new plant at that location. Our response is as follows:

Repairs on this project were originally commenced in December 1996. That effort was slowed, then halted by the Department's review, and then determination that an air construction permit was needed to complete the planned repairs. Halting the project in 1997 caused a loss of financing that was in place at that time. That air construction permit was issued in 1998.

During 1998 PPP subsequently renegotiated with the lending institutions and constructors associated with the project. Activities were resumed in April 1999 with significant progress being made. Absorption towers (2) have been constructed; a cooling tower and a drying tower are also complete. Removal of all replaced equipment also has been completed. Approximately \$13.2 million have been expended in this effort.

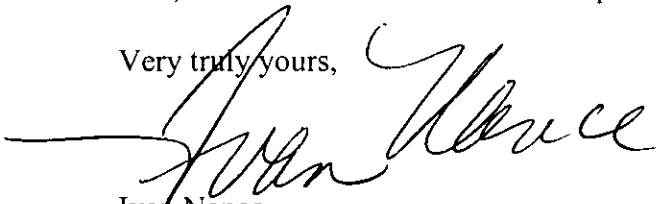
Mr. C. H. Fancy, P.E., Chief
Florida Department of Environmental Protection
8 June 2000
Page 2

PPP halted permitted activities in January 2000 due to an unanticipated downturn in fertilizer market conditions. Attached find a listing of tasks to be completed to bring the project to culmination. At this time PPP is only forecasting that resumption of permitted activities will resume in October 2000 and be completed by July 2001.

PPP does still have interest in permit application to construct a new sulfuric acid plant at that location. However, as you may recall, certain emissions control equipment capability for the proposed plant was to be determined by operation of the repaired plant. At this time PPP requests to continue that methodology to determine if design criteria for the proposed plant will change.

Please consider the foregoing information related to this request for extension of the expiration date; then if further information is required, please contact our offices.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ivan Nance", written over a horizontal line.

Ivan Nance
Corporate Environmental Manager


/rmm

Attachments

MULBERRY  CORPORATION

Mulberry Phosphates, Inc. • Piney Point Phosphates, Inc. • Nu-Gulf Industries, Inc.

--- MEMORANDUM ---

TO: Ivan Nance
FROM: G. W. Hartman, P.E. 
DATE: May 25, 2000
SUBJECT: PPP Sulfuric Acid Plant / Construction Status
COPY: Al Castle / Leon Willis

Dear Mr. Nance:

The final project status issued at the end of 1999 by Monsanto Enviro-Chem (MEC) still stands as there has been no activity this year:

Engineering:	97% complete
Procurement:	76% committed
Construction:	27% complete
Project:	68% complete

Assuming favorable market indications and approval for a project re-start by September 2000, approximately 2 months will be required for re-mobilization (on the parts of both PPP and MEC) during which time the engineering and procurement efforts should be completed. With clement weather and no unforeseen circumstances being encountered during construction, a plant start up can be anticipated as early as June 2001.

The following is a re-cap of the task list submitted with the original permit application as "APPENDIX A: List of Proposed Repairs."

1. Sulfur Burner (existing): No activity
2. BFW Heater (deaerator / new): Procured, installation pending

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3. **Waste Heat Boilers (existing): Inspection complete, repairs pending**
4. **Economizer (new): Procured, installation pending**
5. **Main Compressor (existing): Repairs complete, installation pending**
6. **No. 1 Converter (existing): Inspection complete, repairs pending**
7. **No. 2 Converter (existing): Inspection complete, repairs pending**
8. **Drying Tower (new): Vessel complete w/ brick lining installed, acid distribution procured, installation pending**
Interpass Tower (new): Vessel complete, brick lining, acid distribution procured, installation pending
Final Tower (new): Vessel complete, brick lining, acid distribution procured, installation pending
9. **Drying Tower Mist Eliminators (new): Procured, installation pending**
Interpass Tower Mist Eliminators (new): Procured, installation pending
Final Tower Mist Eliminators (new): Procured, installation pending
10. **Cold Interpass Heat Exchanger (cold shell / new): Procured, foundation complete, installation pending**
Cold Interpass Heat Exchanger (hot shell / existing): Cleaned
Hot Interpass Heat Exchanger (cold shell / new): Cleaned
11. **No. 1 Superheater (existing): Inspection not complete**
12. **Condensate Storage Tank (new): Procured, installation pending**
13. **Cooling Tower (new): Installed**
14. **Combination Acid Coolers (new): Procured, installation pending**
Product Acid Cooler (new): Procured, installation pending
15. **Acid Pump Tank (new): Part of interpass tower (#8 above)**

16. **Sulfuric Acid Tanks (existing): Repairs complete**
17. **Plant Stack (existing): Repairs complete, repainting pending**
18. **Sulfur Pumps (new): Procured, installation pending**
Common Acid Circulation Pump (new): Procured, installation pending
Acid Drain Pump (new): Procured, installation pending
Cooling Water Pumps (new): Procured, installation pending
Condensate Transfer Pump (new): Procured, installation pending
19. **Gas Ducts (new and existing): Procurement and installation pending**
20. **Strong Acid Piping: Procurement and installation pending**
Miscellaneous Piping: Procurement and installation pending
Valves: Procurement and installation pending
21. **SO₂ Monitor (existing): Repairs pending**
22. **Office - Control Room (existing): Clean-up complete, rebuild pending**
23. **Structural Steel: Repairs to existing pending, new procured w/ 25% installed**
Insulation: Procurement and installation pending
Painting: Pending
Electrical: Pending
Pilings and Foundations: Complete
24. **Instrumentation: Procurement and installation pending**
25. **Molten Storage Tank (existing): Repair complete, reinstallation and piping pending**
26. **Auxiliary Boiler (new): Complete**
27. **Miscellaneous: Most items pending**

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Robert Stewart, Sr. V.P.
Piney Point Phosphates, Inc.
P. O. Drawer 797
Mulberry, FL 33360

2. Article Number (Copy from service label)
Z 341 355 321

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery
C. Signature Agent Addressee
D. Is delivery address different from item? Yes No
If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.
 4. Restricted Delivery? (Extra Fee) Yes

Z 341 355 321

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to
Mr. Robert Stewart, Piney Pt.

Street & Number
P. O. Drawer 797

Post Office, State, & ZIP Code
Mulberry, FL 33860

Postage \$

Certified Fee

Special Delivery Fee

Restricted Delivery Fee

Return Receipt Showing to Whom & Date Delivered

Return Receipt Showing to Whom, Date, & Addressee's Address

TOTAL Postage & Fees \$

Postmark or Date
0810002-004-AC
PSD-FL-242
Mailed: 6-29-00

PS Form 3800, April 1995

LANDERS & PARSONS, P.A.
ATTORNEYS AT LAW

DAVID S. DEE
DIANE K. KIESLING
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LESLIE J. PAUGH
ROBERT SCHEFFEL WRIGHT

VICTORIA J. TSCHINKEL
SENIOR CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

RECEIVED

MAR 22 2001

BUREAU OF AIR REGULATION

March 21, 2001

MAILING ADDRESS:
POST OFFICE BOX 271
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310 WEST COLLEGE AVENUE
TALLAHASSEE, FL 32301

TELEPHONE (850) 681-0311
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Mr. Al Linero
Administrator of New Source Review
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road, Mail Station 5500
Tallahassee, FL 32399-2400

Re: DEP File No. 0810002-004-AC (PSD-FL-242)
Piney Point Sulfuric Acid Plant

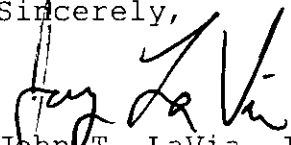
Dear Al:

The purpose of this letter is to request that the Department provide written notice to us, on behalf of Manatee County, of any agency action or proposed agency action with regard to DEP File No. 0810002-004-AC (PSD-FL-242), the construction permit for Piney Point Phosphate's existing sulfuric acid plant. Please provide the written notice to:

David S. Dee
Landers & Parsons
Post Office Box 271
Tallahassee, FL 32302

Thank you for your assistance in this matter.

Sincerely,


John T. Lavia, III

cc: Jeff Steinsnyder