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E	Sen Mr. Neil R. Greenwood, P.E.			
<u>-</u>	Jacobs Engineering Group Inc. 5321 Glenmore Drive City Lakeland, Florida 33813			
7001				
	PS Form 3800. January 2	001	See Reverse for Instructions	

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5321 Glenmore Drive Lakeland, Florida 33813	3. Service Type ★ Certified Mail	
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PS Form 3811, August 2001

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Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

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Department of Environmental Protection

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

Colleen M. Castille Secretary

May 11, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Neil R. Greenwood, P.E. Jacobs Engineering Group Inc. 5321 Glenmore Drive Lakeland, Florida 33813

Re: Mosaic Phosphates Company DAP #5 Reactor Tank

Dear Mr. Greenwood:

The Department has reviewed your request that you submitted on behalf of Mosaic for an "in-kind" replacement of the Number 5 DAP reactor tank (RT). Please provide the following information to the Department so a determination can be made if a modification is taking place:

- 1. Indicate the name of the facility/plant where the replacement of RT is taking place.
- 2. Provide a flow diagram of the plant showing the main components and highlighting the replacement to be made.
- 3. Provide a summary of production rate and emissions from the Number 5 DAP for the last two years (2003 and 2004). Also, include annual operating hours for those two years.
- 4. In order to verify like-kind replacement relative to its size, please provide drawings of the old and new RT showing important dimensions. Also, include documentation stating the design capacity of the new RT as well as the old RT.
- 5. Provide the total cost of replacing the RT as well as percentage of cost when compared to a DAP plant.
- 6. Please explain why increased efficiency due to improved liquid flows for the new RT will not increase production capacity.

After we review the requested information, we will make a determination if this change constitutes a modification.

For your information, modification is defined in Rule 62-210.200(169) as "any physical change in, change in the method of operation of, or addition to a facility which would result in an increase in the *actual emissions* of any air pollutant subject to regulation under the Act, including

"More Protection, Less Process"

Mr. Neil R. Greenwood Page 2 May 11, 2005

any not previously emitted, from any emissions unit or facility". Actual emissions are defined in Rule 62-210.200(11).

If you have any questions, please call me at (850)921-9528.

Sincerely,

Syed Arif, P.E. II

North Permitting Section

/sa

cc: Joel Smolen, DEP-SWD