



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

April 29, 2002

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. John B. Koogler, Ph.D., P.E.  
Koogler & Associates Environmental Services  
4014 N.W. 13<sup>th</sup> Street  
Gainesville, FL 32609

Re: Clarification of Permit Conditions  
DEP File No. 1050051-015-AC (PSD-FL-321)  
USAC – Ft. Meade Granular MAP/DAP Plant

Dear Mr. Koogler:

The Department reviewed your letter dated April 8, 2002 in which you asked for clarifications on couple of items in the above referenced permit, issued on March 15, 2002. The Department's response is as follows:

1. Section II, Administrative Requirements, Condition 11: The word "if applicable" is acceptable to the Department.
2. Section III, Emission Unit(s) Specific Condition 15: The Department does not agree with the facility making the determination of the total mass rate in only short tons per hour instead of both short tons per hour and megagram per hour (Mg/hr). The Granular MAP/DAP Plant is subject to the applicable requirements of the New Source Performance Standards as codified in 40 CFR 60 Subpart V. 40 CFR 60.223(b) requires the owner or operator to determine the total mass rate in Mg/hr of phosphorus bearing feed using a flow monitoring device. Specific Condition 3 of Subsection B of the permit limits the production rate to not exceed 60 tons of MAP (31.8 tons of P<sub>2</sub>O<sub>5</sub> feed per hour) or 60 tons of DAP (28.2 tons of P<sub>2</sub>O<sub>5</sub> feed per hour). The facility is required to comply with both the requirements.

If you have any questions regarding this matter, please contact Syed Arif, P.E. at 850/921-9528.

Sincerely,

A. A. Linero, P.E. Administrator  
New Source Review Section

cc: J. Girardin, USAC

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John B. Koogler, Ph.D., P.E.  
 Koogler & Associates Environmental Services  
 4014 N.W. 13th Street  
 Gainesville, FL 32609

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