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July 5, 2005

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BUREAU OF AIR REGULATION

Ms. Trina Vielhauer, Chief  
Bureau of Air Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**RE: Mosaic Phosphates – South Pierce Facility**  
**Hydrogen Fluoride Emission Rate Measurements**

Dear Ms. Vielhauer:

Please find enclosed for your review a first draft copy of the above referenced report prepared by Arcadis for Mosaic's South Pierce facility.

The report's authors summarize sampling activities conducted, briefly present potential study limitations, and provide preliminary conclusions which attempt to determine emission factors for various operational areas, i.e., cooling ponds and gypsum stack ponds. This methodology is primarily applicable to landfills and still is under peer review.

There is a substantial difference between previous estimated emissions and those presented in this report, both from very similar measured concentration data. Therefore, Mosaic intends to further investigate and verify or dispute any and/or all aspects of the study plan, and comment on the validity of the conclusions presented in this document. Mosaic plans on conducting further studies, confirming parallel methodologies and seeking peer reviews regarding HF emissions from these fugitive sources. Mosaic does not represent or present this study report as a validated final document.

Pursuant to draft Compliance Plan CP-1, copies of the previous emission unit HF testing are included. Also included you will find process water analyses for the samples collected during the corresponding test periods.

Sincerely,

J. A. Golwitzer  
Plant Manager  
Mosaic – South Pierce

JAG:jp\HF Emission Rate\_070505  
enclosure

Trina Vielhauer, Bureau of Air Regulation  
Florida Department of Environmental Protection  
July 5, 2005  
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cc: Robert Bull, FDEP-Tallahassee  
Joel Smolen, FDEP-Tampa  
Dean Ahrens, Mosaic Phosphates  
Dave Turley, Mosaic Phosphates  
Koogler & Associates