



Certified Mail 7004 2510 0002 0526 6806
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Mosaic Fertilizer, LLC
P. O. Box 2000
Mulberry, Florida 33860-1100
863.428.2500
www.mosaicco.com

February 24, 2006

Mr. Robert Bull
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road MS 5505
Tallahassee, Florida 32399-2400

**RE: Compliance Plan CP-1
Permit No. 1050055-014-AV
AIRS No. 1050055
Emissions Units Nos. 008, 009 and 023
South Pierce Plant**

RECEIVED
FEB 27 2006
BUREAU OF AIR REGULATION

Dear Mr. Bull:

This notification is made pursuant to Condition 3.a. of the above-referenced compliance plan. The monitoring devices have been installed on the referenced emissions units, Phosphoric Acid Plant--A and B Trains and the GTSP Production Plant, as subject to the MACT monitoring specified in 40 CFR 63 Subparts AA and BB.

Thank you for your attention to this matter. If you have any questions, please contact me at (863) 428-7106 or C. D. Turley at (863) 428-7153.

Sincerely,

Dean Ahrens
Environmental Superintendent

JDA:jp\RBull 01.doc

cc: J.A. Golwitzer, South Pierce
J. Waters, FDEP Tampa
Koogler & Associates, Inc.



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

KA 124-03-07

September 6, 2005

RECEIVED

SEP 07 2005

BUREAU OF AIR REGULATION

Mr. Bobby Bull
Florida Department of
Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Additional Comments on Draft Permit
Mosaic Phosphates Company – South Pierce Plant
File No. 1050055-014-AV

Dear Mr. Bull:

This is a follow up to your correspondence of August 23, 2005, regarding MACT applicability for the above referenced facility. This affects the CAM applicability for the emissions units as discussed below.

Additionally, as suggested by FDEP, the following three questions are answered in order to make a determination that a piece of equipment is inherent to the operation rather than strictly a control device:

1. Is the primary purpose of the equipment other than to control emissions relative to the applicable emissions limit (e.g., product recovery, worker safety)?
2. Would the equipment be installed if there were no applicable emissions limit in place for the pollutant specific emissions unit?
3. Is the efficiency at which the equipment is operated by design for purposes other than compliance with the applicable emissions limit more than sufficient to assure compliance with the applicable emissions limit (e.g., a significant margin of compliance)?

GTSP Production Plant: This emissions unit utilizes cyclones, as process equipment, to collect and return particulate matter to the process. For the cyclones, the answer to all the three questions above is "yes". The plant utilizes wet scrubbing to control fluoride emissions in order to comply with the MACT standard. There is no equipment installed specifically for particulate matter emission control. Consequently, CAM requirements do not apply.

Mr. Bobby Bull
Florida Department of
Environmental Protection

September 6, 2005

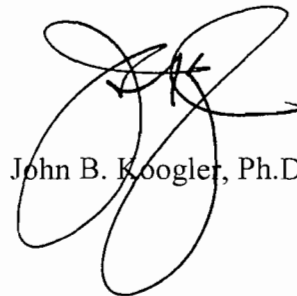
GTSP East Storage Building: This emissions unit utilizes wet scrubbing to control fluoride emissions in order to comply with the MACT standard. There is no equipment installed specifically for particulate matter emission control. Consequently, CAM requirements do not apply.

No. 2 Ball Mill Grinding System: This emissions unit utilizes a bag collector that is used for material recovery. All the material collected in the bag collector is returned to the process. For the bag collector, the answer to all the three questions above is "yes". Consequently, CAM requirements do not apply.

If you have any additional questions, please call Pradeep Raval.

Very truly yours,

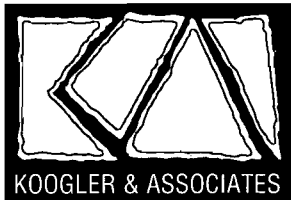
KOOGLER & ASSOCIATES

A handwritten signature in black ink, appearing to be 'JBK', enclosed within a large, loopy circular flourish.

John B. Koogler, Ph.D., P.E.

JBK:par

C: J. Golwitzer, Mosaic
D. Ahrens, Mosaic
C. D. Turley, Mosaic



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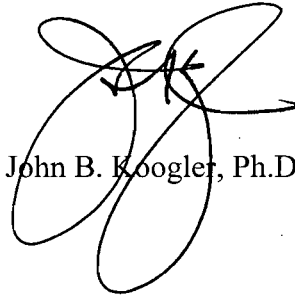
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Very truly yours,

KOOGLER & ASSOCIATES

A handwritten signature in black ink, consisting of several overlapping loops and a final horizontal stroke, positioned above the printed name.

John B. Koogler, Ph.D., P.E.

JBK:par

C: J. Golwitzer, Mosaic
D. Ahrens, Mosaic
C. D. Turley, Mosaic



RECEIVED

MAY 05 2005

Via Facsimile: 813-744-6458

BUREAU OF AIR REGULATION

April 29, 2005

Mr. Joel A. Smolen
Air Program Compliance/ Enforcement Supervisor
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8318

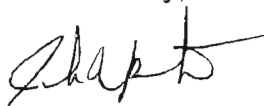
RE: Special Testing Notification
South Pierce Plant

Dear Mr. Smolen:

The Hydrogen Fluoride ambient measurement testing by Arcadis Inc. is scheduled to begin on May 13 and will extend to May 20. This testing is part of the HF Mact determination for Air Permit No. 1050055-014-AV for the Mosaic Phosphates South Pierce facility.

Please contact me if you have any questions at (863) 428-7106.

Sincerely,


for → P. A. Steadham
Environmental Services
Florida Concentrates

PAS:jp\sp_smolen_042905

cc: R. Bull (FDEP-Tallahassee)
J. A. Golwitzer
P. C. Burris
S. R. Sellers
J. D. Carnes
C. D. Turley
J. B. Upton

5/12/05

FTIR - 6 MONTHS FROM BEING
USEPA METHOD

SOUTH PIERCE POND TESTING SITE MEETING

- POND TEMP - TRENDS

- BOREAL TDL

- RPM for EMISSION CHARACTER. - PEER REVIEW - ABOUT HOW TO
SET UP CONFIGURATION FOR LAGOON/FUGITIVE EMISSIONS

• HORIZONTAL - SEARCH FOR HOT SPOTS

• VERTICAL - MEASURE EMISSIONS

- REALTIME - FLUX RATE

MEASURED AT: g/SEC/unit area

POST ANALYSIS - EMISSION RATE

- TESTING WILL TYPICALLY AFTER 11 AM DUE TO WIND

- DAY 5 FUGITIVE SOURCE ON SITE (QUANTIFY FOR FACILITY)

- DAY 1-3 COLLECTION ON CANAL - DAY 4 GYP STACK

ORDER
REQ
OPTIMUM
COLLECTION
(WEATHER)

- WATER CHEMISTRY: STL PULL SAMPLES - SAMPLING AT SAME POINT
AS MEASUREMENT

- TESTING DATES - WANT ACCESS TO WEEKEND TESTING

- SCRUBBER FLOW ΔP

- FLOW RATES I.E. FLOW TO CANAL

SETUP 8-11 AM 11-4/5 PM 1 HR - OPTIMUM CONDITIONS

DAYS
TURLEY
863-860 1322

Water δ_A		
<u>Site</u>	<u>ft.</u>	<u>Temp ($^{\circ}\text{C}$)</u>
W1	1.8	35.3
W2	1.61	46.9
W33	1.61	47.5
W4	1.63	46.8
W5	1.66	46.6



HF MEETING 5/12/05

NAME	AFFILIATION	EMAIL
Jeff Golwitzer	Mosaic	
John Upton	Mosaic	
Ross Sellers	Mosaic	
Robin Simons	MOSAIC	
Jim Carnes	Mosaic	James.Carnes@mosaicco.com
Patrick Burris	Mosaic	
DAVID TURLEY	"	David.Turley@mosaicco.com
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BOBBY BULL	FDEP	robert.bull@dep.state.fl.us
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Freddie Senterfitt	Mosaic	
PHIL STEADHAM	MOSAIC	PHIL.STEADHAM@mosaicco.com