



bcc: C. A. Pflaum

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 17, 1996

Mr. Gerald J. Kissel
Florida Department of
Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8318

RE: REQUEST FOR MODIFICATION OF FDEP AIR OPERATING PERMITS
Phosphoric Acid Plant "A" and "B" Train
Permit Nos. AO53-212236A and AO53-212237A
AIRS ID No. 1050055
Unit ID Nos. 008 and 009
South Pierce Plant

Dear Mr. Kissel:

The testing of the "A" and "B" scrubbers at the above-reference facility have been completed. This testing was authorized by the Department in a letter to J. M. Baretincic dated June 17, 1996. The attached results are summarized in the following table:

A Scrubber				B Scrubber			
Flow gpm	Drop in HOH	Pressure psig	Emission lb F/ton	Flow gpm	Drop in HOH	Pressure psig	Emission lb F/ton
2442	5.8	35	0.0025	2410	8.7	37	0.0027
1227	5.1	35	0.0021	1620	7.9	35	0.0049
1014	5.8	35	0.0021	1230	7.4	43	0.0052

The allowable emissions from the units are 0.02 lbs. F/ton of P₂O₅ feed. Based on the above results, a request is being made to modify the Specific Condition 7 of each permit as follows:

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7. When in operation, the liquid flow rate to the scrubber system for Phosphoric Acid Plant "A" Train (or "B" Train) shall be a minimum of 2400 1200 gallons per minute.

Thank you for your attention to this matter. If you have any questions, please contact C. D. Turley at 941-428-7153 or me at 941-428-7106.

Sincerely,



P. A. Steadham
Chief Environmental
Services - Concentrates

Enclosures

xc: C. D. Turley

Bull, Robert

From: Vielhauer, Trina
Sent: Thursday, January 20, 2005 11:01 AM
To: Bull, Robert; Pennington, Jim
Cc: Pichard, Errin
Subject: RE: IMC South Pierce

Great. Thanks. The PCS compliance plan/settlement agreement and the drafts we've sent on CF should help craft a compliance plan for IMC, too.

-----Original Message-----

From: Bull, Robert
Sent: Thursday, January 20, 2005 10:56 AM
To: Vielhauer, Trina; Pennington, Jim
Cc: Pichard, Errin
Subject: IMC South Pierce

Trina,

Good News! I spoke with Phil Steadham regarding their permit. I explained we needed to move forward with the permit, and incorporate the testing, future monitoring and parameter testing into a compliance plan.

We agreed that the "Testing to get out of the MACT" language will be in the permit as well as Subpart AA and BB will be part of the permit. The monitoring applicability will be based on the HF test results for the MACT. The CAM plan, as of now, will be based upon the facility being subject to the MACT. This will need to be updated if the tests show they are not major to include Fluoride for 4 of the 5 EU subject to CAM. Also, I think we will need to incorporate a parameter testing schedule for this testing. We will need a timeframe for the complying with the MACT if they are subject, especially for the GTSP plant and storage facility. South Pierce will need a construction permit for the GTSP storage facility scrubbers to upgrade the facility to be in compliance with the MACT.

We also agreed that the permit will not be held up for the HF testing protocol from Arcadis. Arcadis will be the testing company, and the initial plan is for a week of testing. I will forward copies of the protocol to each of you when I receive it.

Once we agree on a Compliance Plan, South Pierce should be off the board completely.

Thanks,
Bobby

1/20/2005



Mosaic Phosphates Company
P.O. Box 2000
Mulberry, FL 33860
www.mosaicco.com

Tel 863-428-2500

Certified Mail 7003 1010 0004 7147 4102
Return Receipt Requested

March 8, 2005

RECEIVED

MAR 15 2005

BUREAU OF AIR REGULATION

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

Re: **Arcadis Testing Proposal for HF Emissions From
Process Water Cooling Pond – South Pierce**

Dear Mr. Bull:

Enclosed you will find a copy of a proposed testing plan for measuring HF emissions from the process water cooling pond at the Mosaic South Pierce plant.

Once you have had an opportunity to review this plan we can discuss it at your convenience.

Thank you.

Sincerely,

P. A. Steadham
Environmental Services
Florida Concentrates

PAS:jp\SP-Bull_Arcadis_030805
enclosure

cc: D. B. Jellerson
J. A. Golwitzer
C. D. Turley
J. B. Upton
G. J. Kissel – Tampa FDEP
R. Hashmonay – Arcadis – w/o enclosure