

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
OFFICIAL USE	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Postmark Here	
Sent To Mr. M.A. Daigle, Vice President	
Street, Apt. No., or PO Box No. Post Office Box 2000	
City, State, ZIP+4 Mulberry, Florida 33860	
PS Form 3800, May 2000 See Reverse for Instructions	

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Mr. M.A. Daigle, Vice President
IMC Phosphate Company
Post Office Box 2000
Mulberry, Florida 33860

2. Article Number
(Transfer from service label)

7000 1670 0013 3109 9618

PS Form 3811, August 2001

COMPLETE THIS SECTION ON DELIVERY

- A. Signature
* *[Signature]* ☐ Agent ☐ Addressee
- B. Received by (Printed Name)
[Signature]
- C. Date of Delivery
- D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

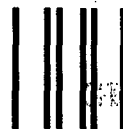
3. Service Type
- ☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

Domestic Return Receipt

102595-02-M-1540

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

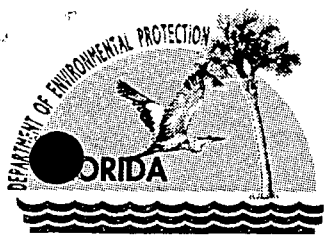
• Sender: Please print your name, address, and ZIP+4 in this box •

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

RECEIVED
MAY 26 2004
BUREAU OF AIR REGULATION

32399+2400





Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

May 20, 2004

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. M. A. Daigle, Vice President
IMC Phosphates Company
PO Box 2000
Mulberry, FL 33860

Re: Title V Renewal Request for Additional information dated April 21, 2004
Reference Permit No. 1050055-014-AV
South Pierce Facility

Dear Mr. Daigle:

On April 22, 2004, the Department received additional information for your Title V air permit application to renew your existing permit. In order to continue processing the application, the Department will need the following additional information, in addition to information that was previously requested in our letter dated November 21, 2003:

1. Emission Unit Information. You indicated in your response that Emission Units (EUs) #002, 003, 012-014, 016, 017, 027-029, 034, 044-046 have been shut down and will no longer operate at the facility. However, EUs # 034, 045, and 046 were included in the September 26, 2003 application. Please verify that you no longer want to have these units included in the renewal permit, and provide shutdown dates on each unit. Please also provide the shutdown dates for units EUs # 003, 012, 013, 014, 027, 028, and 029.
2. Maximum Achievable Control Technology (MACT) applicability. Your facility maintains it is not a major source of hazardous air pollutants. Please provide the annual amount of hazardous air pollutants emissions from the site. In particular, please quantify the annual amount of HF emissions coming from the gypsum and cooling ponds located on the property. Please provide the fluoride concentrations and pH values of the ponds, and the total acres of pond water. If applicable, please also provide information concerning the closure of these ponds.
3. Compliance Assurance Monitoring (CAM). In your April 21, 2004 response, you propose CAM as meeting the requirements for Facility Wide Condition 14. This is not acceptable. You will need to specify maximum and minimum pressure drop and flow rate for each of the units that are subject to CAM. Also, in order to satisfy the CAM submittal requirements and to approve the previously submitted CAM plans, please submit the following information that was previously requested in our letter dated November 21, 2003:

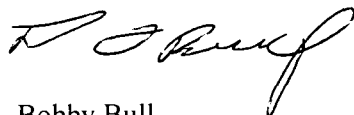
- A. Phosphoric Acid Plant – A and B Train (EU 008 & 009). CAM is applicable for fluoride. The choice of scrubber pressure drop and liquid flow rate through the scrubber are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. The stated indicator range is non-specific and is equivalent to the permit conditions. Using these as CAM indicator ranges will result in a permit violation every time that a CAM excursion is recorded. Please provide a table of test data that correlates the pressure differentials and flow rates to the tested fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop and water flow rate that will assure compliance with the emission limit.
- B. No. 2 Ball Mill Grinding System (EU 022). CAM is applicable for PM. The choice of pressure drop across the baghouse is an acceptable indicator to monitor. Please identify a minimum pressure drop across the baghouse that can be used as an indicator in addition to the 15" maximum pressure drop listed. Please provide a table of test data that correlates the pressure drop to the tested PM emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop that will assure compliance with the emission limit.
- C. GTSP Production Plant (EU 023). CAM is applicable for PM and fluoride. The choice of scrubber pressure drop and liquid flow rate through the scrubbers are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. The stated indicator ranges are non-specific and are equivalent to the permit conditions. Using these as CAM indicator ranges will result in a permit violation every time that a CAM excursion is recorded. Please provide a table of test data that correlates the pressure differentials and flow rates to the tested PM and fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop and water flow rate for each of the scrubbers that will assure compliance with the emission limits.
- D. GTSP East Storage Building (EU 024 and 025). CAM is applicable for PM and fluoride. The choice of fan amperage as an indicator range may be acceptable if a specific range is specified that can be justified by test data. If not, scrubber pressure drop and scrubber water flow might be more appropriate. Please provide a table of test data that correlates the chosen indicator range(s) to the tested fluoride and PM emission levels. From this data, provide a justification of your choices and clearly indicate specific indicator ranges that will assure compliance with the emission limits.
4. Facility Regulatory Classifications. The application is blank for several items in this section. Each item must be answered yes or no.

IMC Phosphates Company – South Pierce
Reference Permit No. 1050055-014-AV

Page 3 of 3

Please submit your response the Department immediately upon receipt of this letter. If you have any questions, please call me at (850) 921-9585 or email me at robert.bull@dep.state.fl.us.

Sincerely,



Bobby Bull
Engineer II
Bureau of Air Regulation

cc: Jason Waters, FDEP-SWD
Pradeep Raval, Consultant, Kooger and Associates
John B. Koogler, PhD., P.E., Kooger and Associates