

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 1140 0002 1578 1635

OFFICIAL USE
 Mr. M. A. Daigle, Vice President

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. P.O. Box 2000
 City, State, ZIP+4 Mulberry, Florida 33860
 PS Form 3800, January 2001 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 Phosphates Company
 P.O. Box 2000
 Mulberry, Florida 33860

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) ISHMAEL M'GILL	B. Date of Delivery 8-16-09
C. Signature X <i>Ismael McGill</i>	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
D. Is delivery address different from item 1? If YES, enter delivery address below:	<input type="checkbox"/> Yes <input type="checkbox"/> No

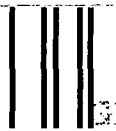
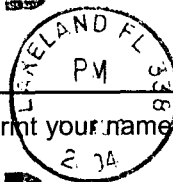
3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2 Article Number (Copy from service label)

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UNITED STATES POSTAL SERVICE



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

FROM

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

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR RESOURCES MANAGEMENT
BUREAU OF AIR REGULATION - TITLE V
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

m. 8 5505

RECEIVED

AUG 18 2004

BUREAU OF AIR REGULATION



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 IMC Phosphates Company
 P.O. Box 2000
 Mulberry, Florida 33860

2. Article Number (Copy from service label)

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COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

ISHMAEL MCGILL

8-16-04

C. Signature

X *Ismael McGill*

☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes

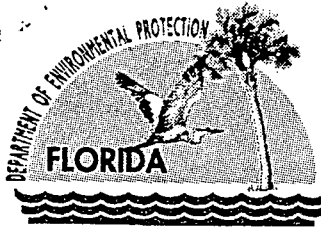
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

August 11, 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 for CAM
Reference Permit No. 1050055-014-AV
South Pierce Facility

Dear Mr. Daigle:

On July 12, 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 submitted on July 12, 2004:

1. Upon review of the facilities HAP Emissions Estimates (Attachment 1), the Department does not agree with your emission estimates used to determine the total amount of HAPs released at the facility. We believe the estimated HF emissions to be larger than your estimations based on the report prepared by Dr. Arthur L. Fricke, dated December 14, 2002. This would result in the facility being subject to the MACT standards, 40 CFR 63 subparts AA and BB. The department intends to incorporate the MACT standards into the permit. The facility in the future may do testing to show minor status to have Subpart AA and BB standards removed from the permit. The Department will also add this language to the Title V Renewal determination of major source status regarding HF MACT applicability:

If additional testing and modeling demonstrate that the facility is not and has never been a major source of hazardous air pollutants since at least June 10, 2002, the permittee shall have the right to request that the Department revise the permit to remove those requirements and conditions that are applicable because the facility is a major source of hazardous air pollutants as determined by the Department.

The facility may contact the Department's Emissions Monitoring group to discuss Alternative Monitoring options. If an Alternative Monitoring Plan is developed, it will be incorporated into the permit as well.

2. Phosphoric Acid Plant – A and B Train (EU 008 & 009). Being subject to the MACT, this emission unit will no longer be subject to CAM for fluoride.

3. No. 2 Ball Mill Grinding System (EU 022). The choice of pressure drop across the baghouse is an acceptable indicator to monitor PM. Can the emission limit be met with new clean bags, or do the bags

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need some material build up to enhance efficiency? Please specify a minimum pressure drop across the baghouse that equates to the condition of the bags following a cleaning cycle that assures compliance with the emissions limit that can be used as an indicator in addition to the 15 inch maximum pressure drop listed. Please provide additional test data for EU 002. 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.

4. GTSP Production Plant (EU 023). The choice of scrubber pressure drop and liquid flow rate through the scrubbers are acceptable indicators to monitor PM. 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. Using these as CAM indicator ranges will result in a permit violation every time that a CAM excursion is recorded. From your test 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. Being subject to the MACT, this emission unit will no longer be subject to CAM for fluoride.

5. GTSP East Storage Building (EU 024 and 025). 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 to monitor PM. If not, scrubber pressure drop and scrubber water flow might be more appropriate. From your test data, provide a justification of your choices and clearly indicate specific indicator ranges that will assure compliance with the emission limits. Being subject to the MACT, this emission unit will no longer be subject to CAM for fluoride.

Additionally, the CAM plan was not submitted in the proper format. Format examples can be found on the EPA Website. Please refer to <http://www.epa.gov/ttn/emc/cam.html> for format examples (Appendix A), and submit your CAM plan in this manner.

Please submit all requested information, postmarked by October 1, 2004, to Mr. Bobby Bull at FDEP Bureau of Air Regulation, MS 5505, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. If the Department does not receive a full and complete response postmarked by October 1, 2004, the Department will determine and take appropriate agency action to process your application. If you have any questions regarding this request for additional information, please contact Mr. Bull at robert.bull@dep.state.fl.us or (850) 921-9585. To discuss the specific CAM requirements, please contact Mr. Jonathan Holtom at (850) 921-9531 or jonathan.holtom@dep.state.fl.us.

Sincerely,



Trina Vielhauer, Chief
Bureau of Air Regulation

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