



IMC Phosphates Company  
P. O. Box 2000  
Mulberry, Florida 33860-1100  
863.428.2500

**CERTIFIED MAIL 7099 3400 0005 0929 7253**  
**RETURN RECEIPT REQUESTED**

January 29, 2001

Mr. A. A. Linero, P.E.  
Administrator, New Source Review Section  
Bureau of Air Regulation  
Florida Department of  
Environmental Protection  
2600 Blair Stone Road MS 5505  
Tallahassee, Florida 32399-2400

**RE: Caustic Addition to A and B Scrubbers**  
**Permit No. 1050059-~~024~~AC (PSD-FL-244)A**  
**AIRS No. 1050059 *033***  
**Emissions Unit No. 036**  
**New Wales Plant**

Dear Mr. Linero:

Pursuant to Specific Condition 7, 15 gallons per hour of 50% caustic is to be added to the A and B Kiln Scrubber Demist Sections. This is to occur at a recirculation rate of 100 gallons per minute for each scrubber. This requirement has resulted in a severe operational problem. The caustic addition has generated a heavy buildup of insoluble, white solids on the packing which has restricted operation of the kiln.

Based on a conversation between J. Reynolds and C. D. Turley on January 24, 2001, please be advised that the caustic flow will be removed for a period of 8-12 hrs. for one of the systems. The original shut down period of 2 days will not be required as discussed. Each of the kilns will be shut down for 8-12 hours to clean and restore the packing in the demist sections. The caustic flow will be stopped in order to check and clean the recirculation sump. The caustic flow will then be resumed at the addition rate of 15 gallons per hour with a recirculation rate of 100 gallons per minute. Any further adjustment of this recirculation rate will be based on minimizing the amount of scaling in the demist packing.

Further evaluations will be made to optimize the means by which this caustic solution is used to scrub the discharge gases in each of the scrubber systems. This will be addressed under separate cover as part of the pending permitting review of the C Kiln system.

Mr. A. A. Linero, PE  
January 29, 2001  
Page 2

Thank you for your attention to this matter. If you have any questions, please contact P.A. Steadham at 863/428-7106 or C.D. Turley at 863/428-7153.

Sincerely,



M. A. Daigle  
General Manager  
New Wales Plant

MAD: oan

Q:\CDT\KILNC07.doc

cc: J. R. Gruber  
G. J. Kissel, FDEP Tampa  
Koogler and Associates  
S. Arif, FDEP Tallahassee  
J. Reynolds, FDEP Tallahassee