



KOOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

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

KA 124-00-05

December 11, 2002

RECEIVED

DEC 13 2002

BUREAU OF AIR REGULATION

Mr. Syed Arif, P.E.
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: IMC Phosphates MP, Inc. (New Wales)
Multifos Plant - Kiln C Permit Revision
No. 1050059-024-AC, PSD-FL-244

Dear Mr. Arif:

This is a follow up to your telephone conversation with Pradeep Raval regarding the status of FDEP's review of the above referenced project.

It is our understanding that the additional information submitted to you during the meeting on November 4, 2002 is under FDEP review; and, a response to the remaining items in your letter dated September 10 is not required at this time. The emission unit operation information requested by Trina Vielhauer last week will be submitted in the next few weeks, as soon as it is compiled.

We really appreciate your willingness to extend the permit expiration date to allow for time to resolve the permitting issues.

If you have any questions, please call Pradeep Raval or me.

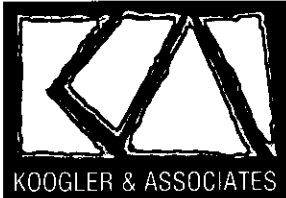
Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:par

c: C. Dave Turley, IMC



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

KA 124-00-05

January 15, 2003

RECEIVED

JAN 21 2003

BUREAU OF AIR REGULATION

Mr. Syed Arif, P.E.
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: IMC Phosphates MP, Inc. (New Wales)
Multifos Plant - Kiln C Permit Revision
No. 1050059-024-AC, PSD-FL-244

Dear Mr. Arif:

This is a follow up to your recent telephone conversation with Pradeep Raval regarding the emissions information requested by Trina Vielhauer for the above referenced emission unit.

The estimated annual emission rate of fluorides, summarized in the attached table, is based on the emission test information previously submitted to FDEP and the unit's operating hours. The calculations are based on the methodology previously discussed with Trina and you.

IMC will revise the permit application, as necessary, subsequent to your review of the enclosed information.

If you have any questions, please call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES



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

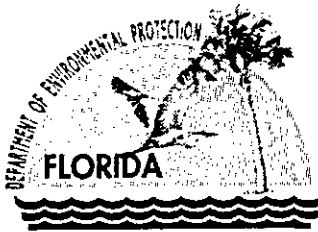
JBK:par
Encl.

c: C. Dave Turley, IMC

IMC New Wales - Multifos C Kiln Operation/Emission Estimates

Date (1)	Emissions, lb F/hr (2)	Hours	Emissions, TPY	COMMENTS	YEAR END (7)	TPY F
10/15/1999				start gas		
10/26/1999	assume same	191	0.04	start feed		
7/13/2000	0.45	5453	1.23			
8/4/2000	0.58	490	0.14			
10/31/2000	0.62	1274	0.40		1	1.81
11/30/2000	0.56	357	0.10			
12/1/2000	0.5	24	0.01			
12/8/2000	1.37	168	0.12	freshwater to demist section (3)		
12/15/2000	0.68	168	0.06			
12/20/2000	1.23	120	0.07	test at highest operation rate (4)		
1/16/2001	0.54	643	0.17			
1/17/2001	1.44	24	0.02	3 hours on indirect source (5)		
5/3/2001	0.66	2496	0.82			
5/3/2001	0.41	24	0.01	4 hours on indirect source (5)		
5/11/2001	0.55	192	0.05			
5/14/2001	assume same	34		start use as dryer (6)		
5/24/2001	0.17	214				
6/1/2001	assume same	156	0.04	end use as dryer (6)	2	1.96
5/18/2002	0.38	7717	1.48		3	1.48
1/9/2003	assume same	5289	1.02		Mid 4	1.02

- NOTES:
- (1) The dates correspond to the dates of the performance and research testing.
 - (2) The lbF/hr emission rates are based on measurements during the performance and research testing.
 - (3) The use of freshwater on demister does not represent normal operation.
 - (4) Testing was conducted at high operation rates without sufficient unit debugging at that rate.
 - (5) Use of indirect source of scrubber water does not represent normal operation.
 - (6) Operation of the unit as a dryer does not represent normal operation and was conducted after special authorization from FDEP.
 - (7) The annual periods are arbitrary time frames of prior 12-months based on test dates.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

June 26, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. M. A. Daigle
Vice President, Florida Concentrates
IMC Phosphates Company
P.O. Box 2000
Mulberry, FL 33860-1100

Re: Extension Request/DEP File No. 1050059-033-AC (PSD-FL-244)

Dear Mr. Daigle:

The Department reviewed your request dated June 10, 2003 submitted on your behalf by Koogler & Associates to extend the expiration date of the construction permit from March 31, 2003 to December 31, 2003. A similar request was submitted to the Department in October 2002, and the construction permit was extended for a period of six months. The reasons given for this extension request are similar to the previous request, to resolve the remaining technical issues associated with the project, in particular problems with non-compliance of Fluoride (F) BACT emission limits of Multifos Kiln C.

Per Rule 62-4.080(3), F.A.C., an extension for a construction permit shall be granted if the applicant can demonstrate reasonable assurances that upon completion, the extended permit will comply with the standards and conditions required by applicable regulation.

The Department in their letter dated September 10, 2002, requested additional cost information related to a separate neutralized scrubber pond as well as cost data for any additional modification to the existing scrubber in order to comply with the established BACT limits on a non-incremental basis. A copy of the letter is attached. Since IMC had decided to look at the synthetic minor aspects for Kiln C, the additional cost information was never provided to the Department. To complete the reasonable assurance requirement in extending a construction permit, please submit the following information:

1. The original BACT determination refers to a separate neutralized scrubber pond for scrubber water for the three kilns. Please provide an estimate (\$/ton of F removal) on a non-incremental basis if a separate neutralized pond is to be used for Kiln C only. Preliminary costing was submitted to the Department via a facsimile on June 23, 2003. The costing is incomplete and should be resubmitted in the form requested.


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2. All cost data submitted in the past should be re-evaluated and done on a non-incremental basis (total costs per total tons of F removed). Additionally, provide information on the selling price of the animal feed ingredient in \$/ton of product.
3. According to the AOR information submitted by IMC to the Department, the annual production from Kiln C for the years 2000 and 2001 were 43,685 and 75,439 tons, respectively. Additionally, the total operating hours for those two years were 6895 and 7994 hours, respectively. Please provide information as to how much production (tons) and operation (hours) were a direct consequence of different tests that were performed on Kiln C. What was the eventual outcome of the product produced in Kiln C?
4. The Department understands that IMC received a proposal from Bionomic Industries, Inc. of Oceanside, California for scrubber retrofit costs to comply with the existing BACT limit for F. Please provide a copy of the proposal, as well as any supporting documents.

According to Rule 62-4-080(3), the permit will remain in effect until the Department takes final action. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If you have any questions regarding this matter, please call Syed Arif, P.E. at 850/921-9528.

Sincerely,



Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/sa
Enclosures

cc: Jerry Kissel, DEP-SWD
John Koogler, P.E., Koogler & Associates



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

September 10, 2002

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. John B. Koogler, Ph.D., P.E.
Koogler & Associates Environmental Services
4014 N.W. 13th Street
Gainesville, FL 32609

Re: IMC Phosphates MP, Inc. (New Wales)
DEP File No. 1050059-033-AC (PSD-FL-244)
Multifos Plant – Kiln C Permit Revision

Dear Mr. Koogler:

The Department received additional information on August 12, 2002 in response to our request for information letter dated May 22, 2002.

In order for the Department to make an informed decision regarding the BACT limits established for fluorides, the following information is required:

- 1) IMC makes reference to a proposal received from Kimre, which proposes to replace the packing in the cross-flow scrubber with four pads in order to control fine particulate. This was stated in IMC's letter to the Department dated May 11, 2001. Please provide a copy of Kimre's proposal and cost data.
- 2) The original BACT determination refers to a separate neutralized scrubber pond to be used for scrubber water for the three kilns. Please provide an estimate (\$/ton of F1 removal) if a separate neutralized pond is to be used for the Kiln C only.
- 3) All cost data should be based on non-incremental allocations (total costs per total tons removed).

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

If you have any questions regarding this matter, please contact me at 850/921-9528.

Sincerely,

Syed Arif, P.E. II
New Source Review Section

cc: Dave Turley, IMC
Jerry Kissel, DEP-SWD

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KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

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

KA 124-00-05

July 10, 2003

RECEIVED

JUL 14 2003

BUREAU OF AIR REGULATION

Mr. Syed Arif, P.E.
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: IMC Phosphates MP, Inc. (New Wales)
Multifos Plant - Kiln C Permit Revision
No. 1050059-024-AC, PSD-FL-244

033

Dear Mr. Arif:

This is a notification, as a follow up to your telephone conversation with Pradeep Raval, regarding IMC's proposal to try using a venturi throat section in addition to the current scrubbing system in the above referenced project.

As you know, IMC has tried several different approaches in trying to resolve the air emissions issue, including some alternatives suggested by FDEP. We are hopeful that the installation of a venturi throat section leading into the existing caustic scrubber, using the same recirculating scrubbing medium, will reduce air emissions. As mentioned to you, this approach will be implemented immediately as the kiln is currently down for maintenance. If the approach works, full details of the arrangement will be forwarded to FDEP soon. Thank you for your continued assistance and suggestions in this matter.

If you have any questions, please call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:par

c: C. Dave Turley, IMC

RECEIVED

JUL 23 2003

BUREAU OF AIR REGULATION



Certified Mail 7002 0460 0002 8878 6363
Return Receipt Requested

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

July 18, 2003

Trina L. Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

**Subject: IMC Phosphates MP Inc. (New Wales)
Multifos Plant - Kiln C Permit Revisions
No. 1050059-024-AC, PSD-FL-244**

033

Dear Ms. Vielhauer:

This is a response to your letter of June 26, 2003, which requested additional information relative to the above referenced construction permit. A response to Questions 1. and 2. has not been prepared at this time in accordance with a discussion between Syed Arif and Pradeep Raval (Koogler & Associates). Based on the outcome of the current project to install a venturi throat section between the two scrubbers, these issues will be addressed as necessary. Questions 3. and 4. are addressed below:

- 3. According to the AOR information submitted by IMC to the Department, the annual production from Kiln C for the years 2000 and 2001 were 43,685 and 75,439 tons, respectively. Additionally, the total operating hours for those two years were 6895 and 7994 hours, respectively. Please provide information as to how much production (tons) and operation (hours) were a direct consequence of different tests that were performed on Kiln C. What was the eventual outcome of the product produced in Kiln C?*

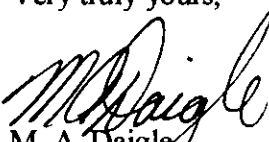
The tonnages reported in the AOR submittals were feed tons recorded to the Kiln, not production tonnages. The production for 2000 from Kiln C was 34,981 tons for the hours reported. Excluding the time period when C Kiln was operated as a dryer, the production in 2001 was 51,278 tons for 7629 hours. This would equate to 67,420 feed tons. The production and operating hours that were a direct consequence of testing in 2000 were 1,262 tons over about 120 hours. In 2001, production and operating hours that were a direct consequence of testing were 1,004 tons over about 120 hours. The outcome of the product produced in C Kiln was to supplement customer demand.

Trina L. Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
July 18, 2003
Page 2

4. *The Department understands that IMC received a proposal from Bionomic Industries, Inc., of Oceanside, California for scrubber retrofit costs to comply with the existing BACT limit for F. Please provide a copy of the proposal as well as any supporting documents.*

Based on contact with John Enhoffer at Bionomic Industries, Inc., there were several proposals made for projects at New Wales. The Multifos scrubbing system was only discussed generally and no specific proposal made for it.

If you have any questions or concerns at all regarding the above information, please do not hesitate to contact me or Dave Turley (863.428.7153).

Very truly yours,

M. A. Daigle
Vice President
Florida Concentrates

MAD :jp\rsp0626

cc : P. A. Steadham
C. D. Turley
Koogler & Associates
S. Arif
Q. Kissel



Certified Mail 7002 0460 0002 8878 6523
Return Receipt Requested

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

August 15, 2003

Trina L. Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

AUG 19 2003

BUREAU OF AIR REGULATION

**Re: IMC Phosphates MP Inc. (New Wales)
Multifos Plant - Kiln C
No. 1050059-024-AC, PSD-FL-244**

633

Dear Ms. Vielhauer:

It was a pleasure to meet with you and Department staff last week at IMC's New Wales facility to discuss the Multifos C Kiln testing program. We have made great strides in understanding the complex processes at work in the kiln system and believe that the installation and testing of new equipment will enable us to provide the Department with reasonable assurance of consistent compliance with fluoride emission limits under normal production conditions.

In accordance with the commitment made by IMC, within the next 90 days we will complete a rigorous engineering and design effort based on testing results. Our engineers will design and install equipment which will enable IMC to have a predictable operation of C Kiln while demonstrating the ability to consistently control fluoride emissions to a level below the PSD significance level of 3 TPY. Our optimism is based on the recent installation of an experimental venturi which has identified mechanisms that control fluoride emissions. As we stated to you at the meeting, we are dedicating sufficient human and physical resources to complete our evaluation prior to November 5, 2003.

We believe the program will provide fluoride emission data that will support a retroactive permit change to the fluoride emission limitation for the Multifos C Kiln to below the PSD significance level of 3 TPY. The fluoride emission measurements will be made using EPA Method 13b. A summary report on this program will be submitted as soon as possible, but no later than November 5, 2003, with interim reporting as appropriate.

During the program, IMC will determine the optimum venturi scrubber operating parameters needed to allow proper kiln operation under normal conditions. It is important that the tests be

Trina L. Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
August 15, 2003
Page 2

done under expected and permitted operating conditions to ensure valid and defensible emissions testing data. We hope to avoid repeated kiln shutdowns, start-ups, and other operational problems which create a greater potential of damage to the kiln. The test data and operation parameters will also be analyzed to identify any surrogate parameters that can also provide additional assurance of compliance. We are preparing and plan to submit an application for a revised fluoride emission limit for Multifos C Kiln to less than 3 TPY in the next few weeks.

Additionally, as discussed during our meeting, IMC is agreeable to a revision of the permitted maximum capacity of the Multifos C Kiln from 25 TPH to 17 TPH feed input. This revision would include a provision that adjusts the maximum permitted operating rate to 110 percent of the rate at which compliance is demonstrated by testing if less than the 17 TPH. This type of condition is presently included in the New Wales Title V Permit. The limit of 17 TPH is 110 percent of the demonstrated operation rate of the existing kilns. They are similar, if not identical, in design to the Multifos C Kiln.

The topic of the other emission testing specified by the construction permit arose at the end of our meeting. As an update, the NOx emissions from the Multifos C Kiln were determined to be 8.2 lb/hr. During the test, the Multifos C Kiln was operating at a production rate of 8 TPH with a heat input rate of 42 mmBtu/hr. This test was conducted on September 19, 2002 and the results were submitted to FDEP on October 20, 2002. The metal emissions from the Multifos C Kiln were 0.061 Cr, 0.0003 Ni, 0.021 Cd, and 0.001 Hg lb/hr. The kiln was operating at an input feed rate of 11.3 TPH. The test was conducted on April 3 and 4, 2000. The test results were submitted to FDEP on June 9, 2000. The fluoride emissions from the mixed feed storage building were determined to be an average emission rate of 0.01 lb/hr. The measurements were made April 5-7, 2000 and the report was also submitted to FDEP on June 9, 2000.

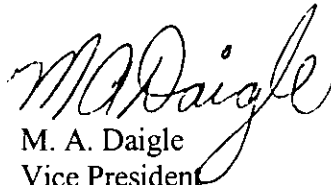
We are encouraged about the promising prospects of success in our operational and testing program. We feel close to fully understanding and controlling the production and emissions from the Multifos C Kiln. We would certainly welcome any input and advice from the Department regarding our testing program, systems or methods to consistently control fluoride emissions.

We would like to take this opportunity to thank you as well as Syed Arif, Al Linero, Bill Thomas (retired), Jerry Kissel, Sheila Schneider and Joel Smolen for your patience, understanding and guidance and for helping to bring these complex issues to an amicable conclusion.

Trina L. Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
August 15, 2003
Page 3

Please feel free to contact me if you have any questions or need additional information, or contact C. D. Turley at 863.428.7153 or P. A. Steadham at 863.428.7106.

Sincerely,


M. A. Daigle
Vice President
Florida Concentrates

MAD :jp

cc : W. C. Tims, Jr., IMC
P. A. Steadham, IMC
J. R. Gruber, IMC
Pradeep Raval, Koogler & Associates
Al Linero, FDEP
Syed Arif, FDEP
Jerry Kissel, FDEP
Joel Smolen, FDEP
Sheila Schneider, FDEP

Q\multrespd



Via Certified Mail 7002 0460 0002 8878 6530
Return Receipt Requested

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

August 15, 2003

Mr. A. L. Linero, P.E.
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

AUG 18 2003

BUREAU OF AIR REGULATION

Re: **Multifos C Kiln**
Meeting Notes

Dear Mr. Linero:

As we indicated after our meeting with you on August 7, enclosed you will find the revised notes from the presentation on Multifos C Kiln.

If you have any questions, please call me at (863) 428-7153.

Sincerely,

A handwritten signature in black ink, appearing to read "C. D. Turley", written over a faint, larger version of the same signature.

C. D. Turley, P.E.
Senior Environmental Engineer

CDT:jp\multifosckiln
enc.

cc: M. A. Daigle
P. A. Steadham
W. C. Tims, Jr.
A. P. Williams



IMC Phosphates Company
New Wales Operations

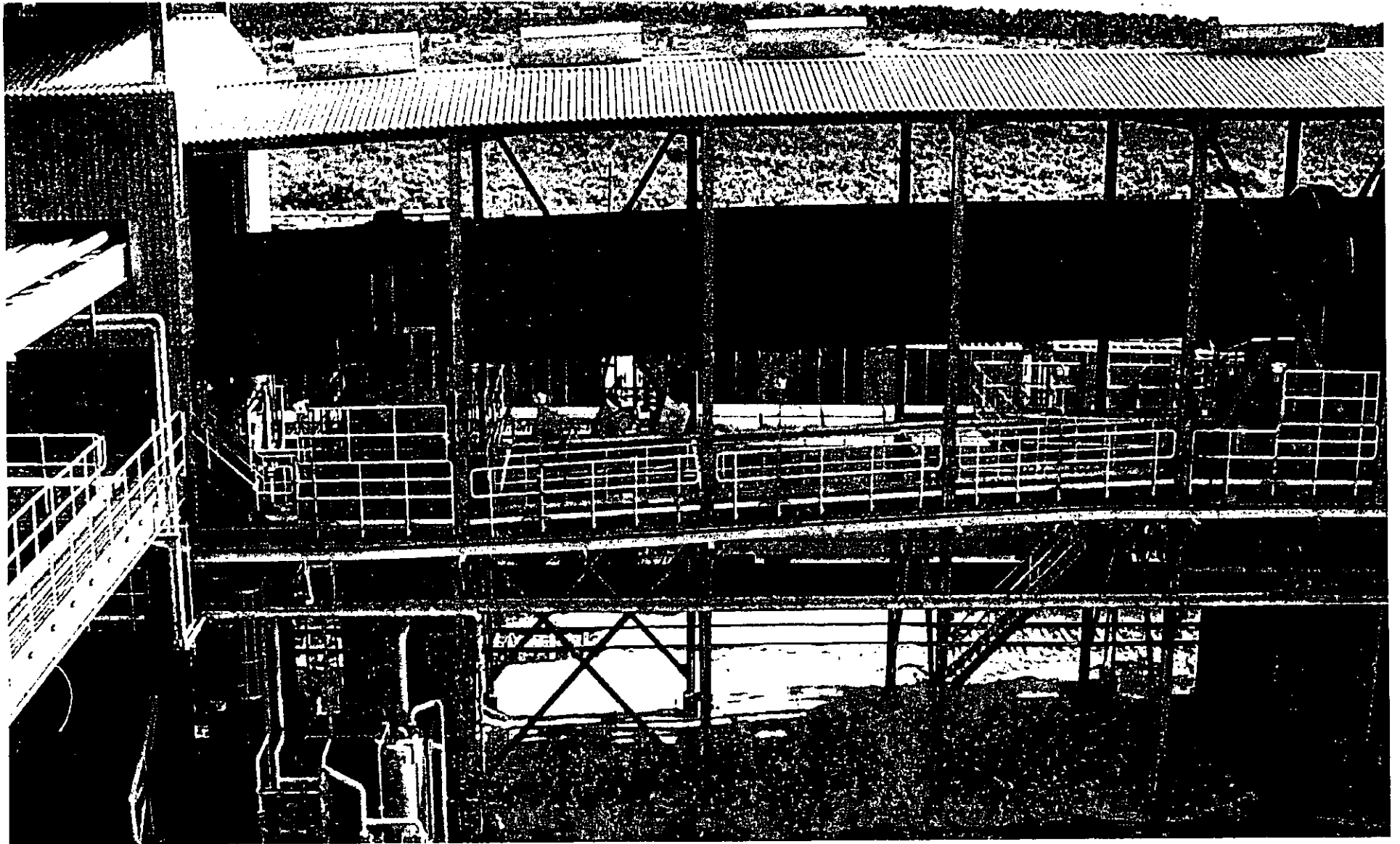
Multifos C Kiln

August 7, 2003

IMC Representatives

Mike Daigle	V.P. Florida Concentrates
James Gruber	Area Production Manager Feeds/Shipping
Phillip Steadham	Manager Environmental Services Concentrates - FI
Willie Tims, Jr.	V.P. Environmental Health & Safety
David Turley	Sr. Environmental Engineer
Andrea Williams	Process Engineering Manager – Concentrates

C Kiln

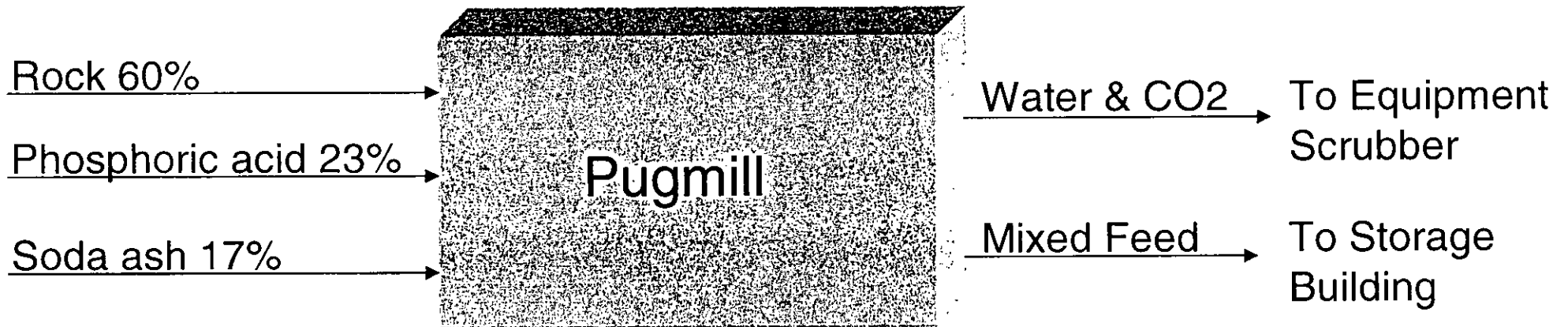


Multifos Specifications

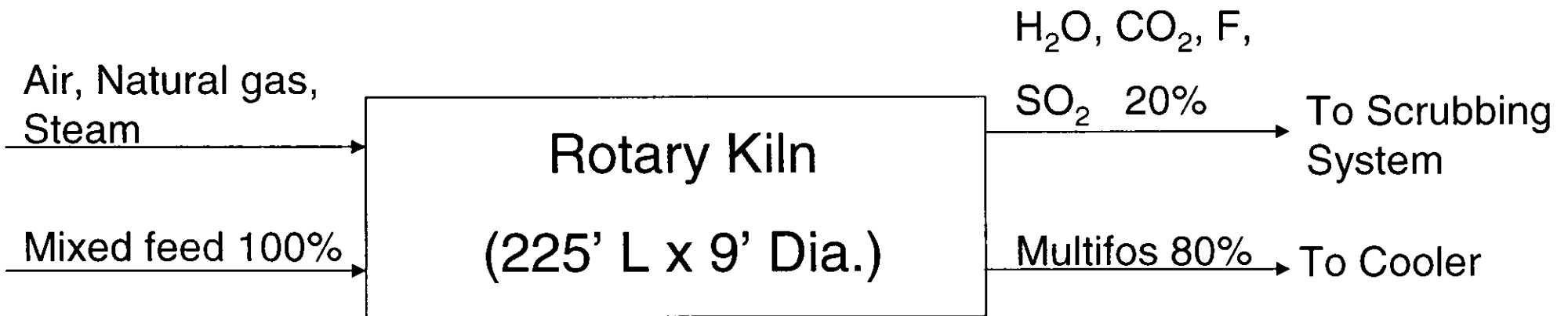
- Multifos[®] IMC's tradename for defluorinated tricalcium phosphate
- Used primarily as a feed supplement for poultry
- Defluorination is via thermal decomposition with maximum temperatures of ~2800°F
- Chemical specifications
 - 18% P (min)
 - 30% Ca (min)
 - 4.7 – 5.2% Na
 - P/F > 100

Manufacturing and Scrubbing System Process Overview

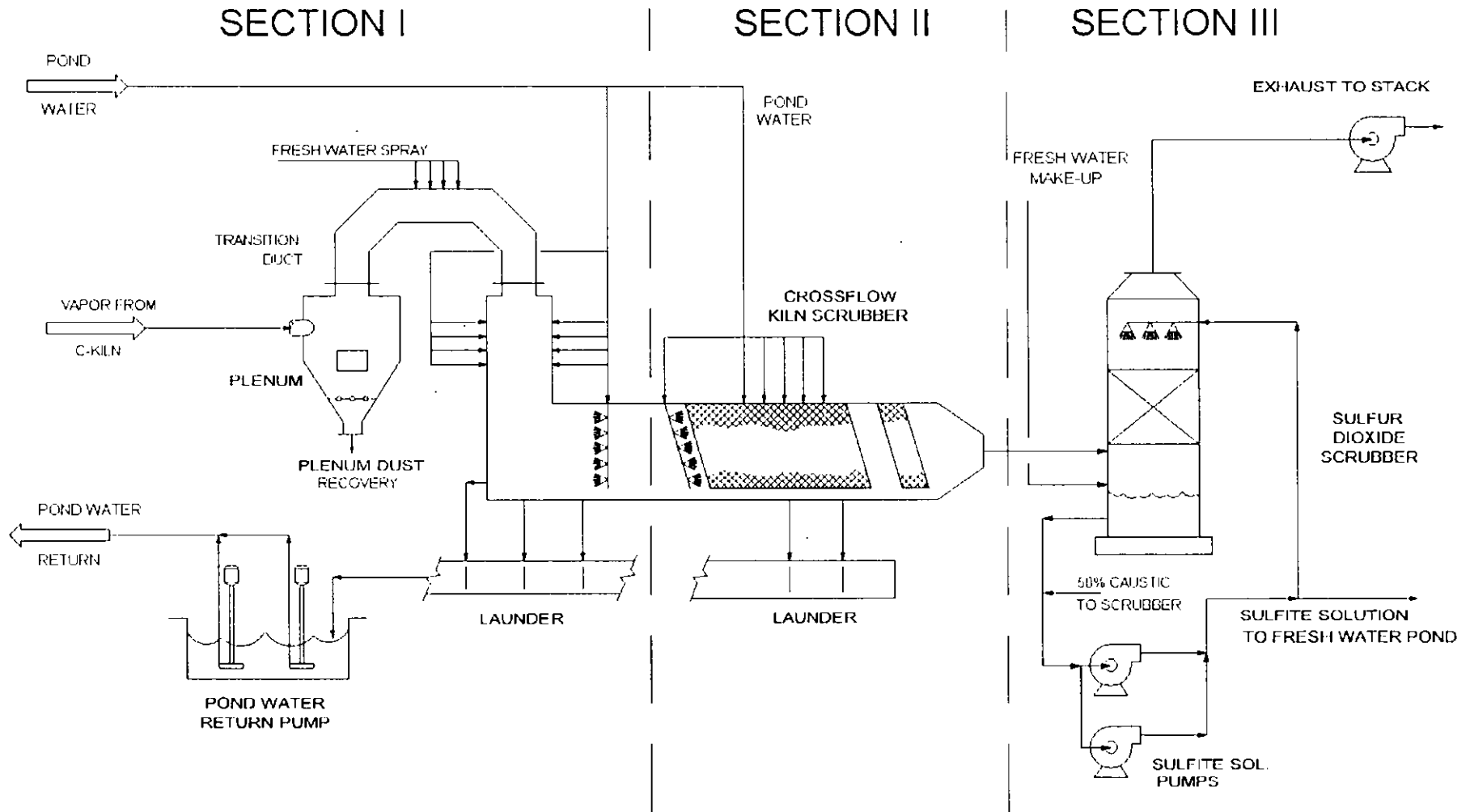
Mixed Feed Preparation Process



Kiln Defluorination Process



C Kiln Scrubbing System



Allowable Emissions

Allowable Emissions	Limit	Aux Limit
Particulate Matter (A & B Kilns)	29.83 lb/hr	
Particulate Matter (C Kiln)	14.3 lb/hr	1.5 lb/ton P ₂ O ₅ in
Fluoride (A & B Kilns)	4.20 lb/hr	0.37 lb/ton P ₂ O ₅ in
Fluoride (C Kiln)	0.36 lb/hr	0.038 lb/ton P ₂ O ₅ in
Sulfur Dioxide (C Kiln)	8.7 lb/hr	

Present Emissions Control

- **Sulfur dioxide (SO₂)**

- Averaging 1/3 of allowable (De minimis)
- >98% efficient

- **Fluoride (F)**

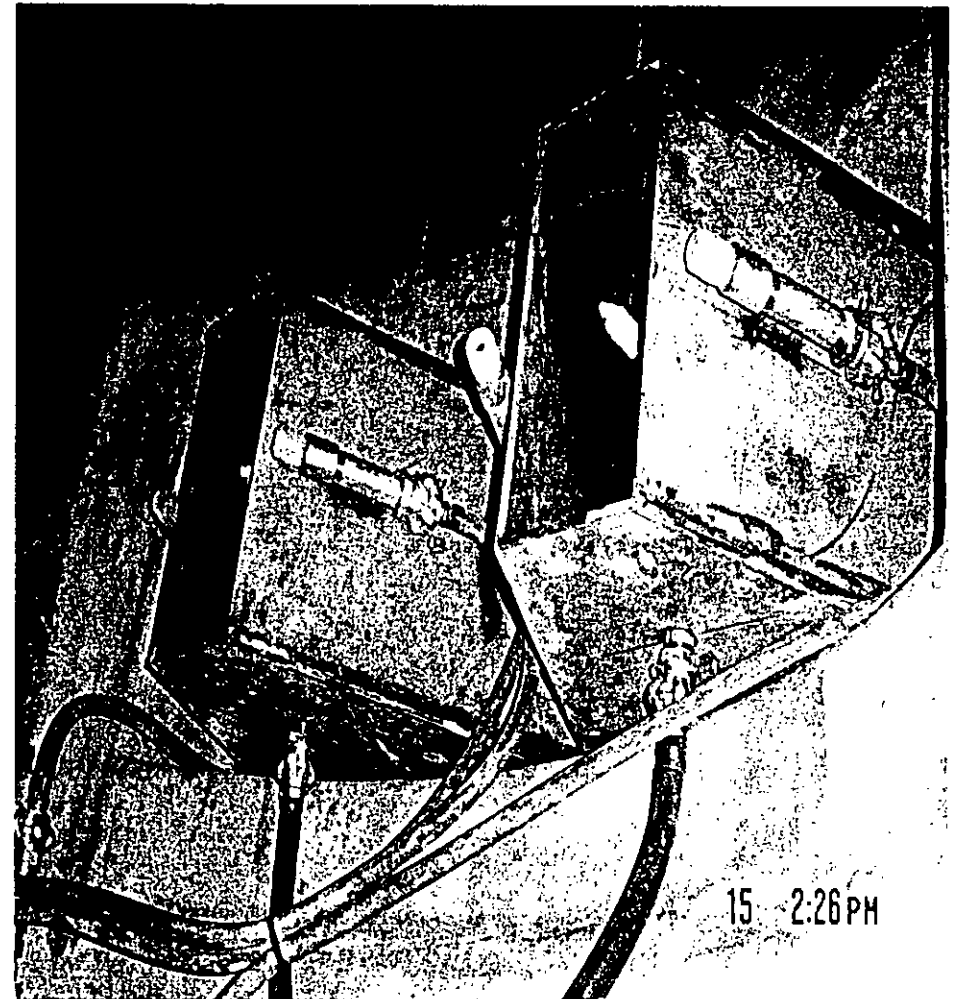
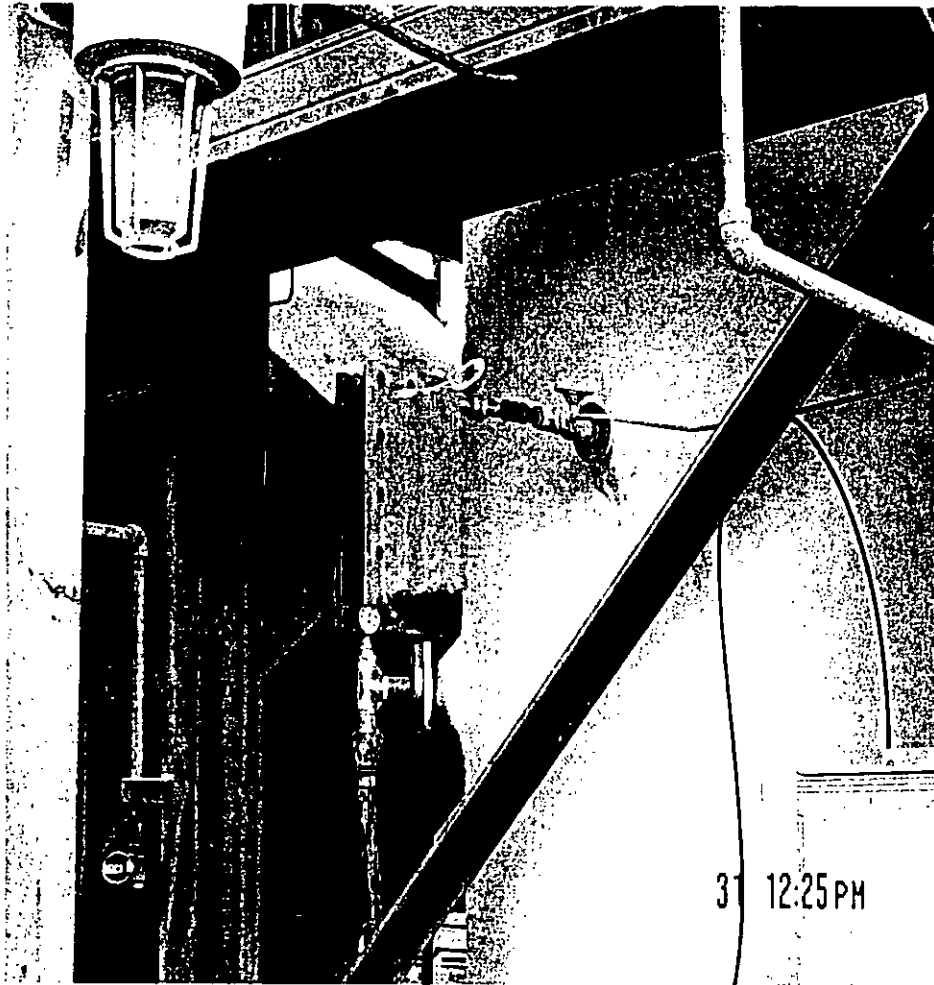
- 99% efficient for fluoride removal
- Testing shows fluoride is not HF
- Design criteria was for HF removal

- **Particulate matter (PM)**

- Tests to date show an average of 3.62 lbs/hr vs. 5.67 lbs/hr allowable

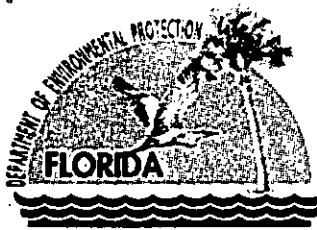
Action Plans

C Kiln Experimental Venturi



Next Phase

- Adjust venturi throat diameter to optimize performance
- Evaluate kiln and scrubber performance



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

October 24, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. M. A. Daigle
Vice President, Florida Concentrates
IMC Phosphates Company
P.O. Box 2000
Mulberry, FL 33860-1100

Re: Extension Request/DEP File No. 1050059-033-AC
Original Permit PSD-FL-244 (1050059-024)

Dear Mr. Daigle:

On July 23, 2003 the Department received your response (dated July 18) to our request for additional information dated June 26. The incompleteness letter related to the subject request received on July 10 from Koogler Associates to extend the original PSD permit for tricalcium phosphate animal feed (Multifos) Kiln C.

The July 18 response deferred answers to the first two questions based on the outcome of the project to install a ventur~~e~~ throat section between the two scrubbers. Because the permit extension request is for Kiln C as a PSD source, responses to those issues are still required to consider extension of the permit.

IMC submitted a separate application (received September 26) that requests substantial changes to the permit and apparently decided not to address the two questions regarding the extension that were outstanding. This letter is to remind IMC (as acknowledged in the July 18 letter) that the application to extend the PSD permit is still incomplete despite the information received in the separate application received on Septemebr 26.

For reference, the outstanding information items still required regarding are:

1. The original BACT determination refers to a separate neutralized scrubber pond for scrubber water for the three kilns. Please provide an estimate (\$/ton of F removal) on a non-incremental basis if a separate neutralized pond is to be used for Kiln C only. Preliminary costing was submitted to the Department via a facsimile on June 23, 2003. The costing is incomplete and should be resubmitted in the form requested.
2. All cost data submitted in the past should be re-evaluated and done on a non-incremental basis (total costs per total tons of F removed). Additionally, provide information on the selling price of the animal feed ingredient in \$/ton of product.

"More Protection, Less Process"

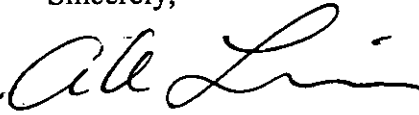
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According to Rule 62-4-080(3), the permit will remain in effect until the Department takes final action. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

Although we are reviewing the separate application, a response to the open questions is still required and is governed by the referenced provision. That means a response is required by January 22, 2004 unless the Department takes final action on the separate application that would moot the extension request.

If you have any questions regarding this matter, please call me at 850/921-9523.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. A. Linero".

A. A. Linero, Administrator
New Source Review Program

AAL/aal

cc: Jerry Kissel, DEP-SWD
John Koogler, P.E., Koogler & Associates

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

OFFICIAL USE

7000 2870 0000 7028 3284

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To
M. A. Daigle
Street, Apt. No.; or PO Box No.
PO Box 2000
City, State, ZIP+4
Mulberry, FL 33860-1100

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, Florida Concentrates
 IMC Phosphates Company
 Post Office Box 2000
 Mulberry, FL 33860-1100

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery
 6-28-03

C. Signature
 X *Joe Howard* 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

2. 7001 0320 0001 3692 5658

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

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

OFFICIAL USE

7001 0320 0001 3692 5658

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

 Postmark
 Here

Sent To
 M. A. Daigle
 Street, Apt. No.,
 or P.O. Box 2000
 City, State, ZIP+4
 Mulberry, FL 33860-1100

PS Form 3800, January 2001

See Reverse for Instructions