

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.

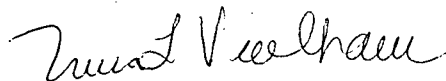
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2. All cost data submitted in the past should be re-evaluated and done on a non-incremental basis (total costs per total tons of F removed). Additionally, provide information on the selling price of the animal feed ingredient in \$/ton of product.
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