

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

May 22, 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) A
Multifos Plant – Kiln C Permit Revision

Dear Mr. Koogler:

The Department received additional information on March 27, 2002 in response to the request for information letter dated December 7, 2001. Additionally, a waiver of the 30-day review period was received granting the 30-day review period to be extended to May 31, 2002.

The cost proposal submitted by Penn Pro again includes installing Kimre panels in the existing scrubber. It then adds the additional amount required for installation of a venturi scrubber upstream of the existing cross-flow scrubber. The Department is interested in the cost analysis under the scenario of using the existing cross flow scrubber (without Kimre panels) and installing a venturi scrubber upstream of the cross flow scrubber. The cost proposal also indicates that the cost estimate is attached, but the detailed breakdown of the total cost was not included with the proposal.

The Department in the previous request for information letter had made reference to some special testing that IMC was going to conduct in reducing fluoride emissions in the existing system. The two possible approaches were: 1) the source of pond water for the quench tower and the cross flow scrubber can be changed and 2) steam can be introduced in the transition section in order to retard any potential evaporation of the pond water. This testing was supposed to be completed by June 1, 2001, as indicated in IMC's letter to the Department of May 11, 2001. Please submit the results of the testing, and if the testing has not been completed, indicate the reasons for the delay.

Additionally, submit an acceptable BACT limit to the applicant based on all the tests conducted on C Kiln from the initial test until present time. All the calculations in arriving at that BACT limit should be shown in detail.

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

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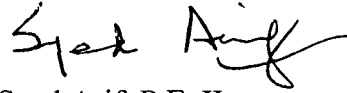
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applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Syed Arif". The signature is fluid and cursive, with the first name "Syed" and the last name "Arif" clearly distinguishable.

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

cc: Dave Turley, IMC
Bill Thomas, DEP-SWD

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.. Koogler, Ph.D., P
 Koogler & Associates
 Environmental Services
 4014 NW 13th Street
 Gainesville, FL 32609

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