

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

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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.

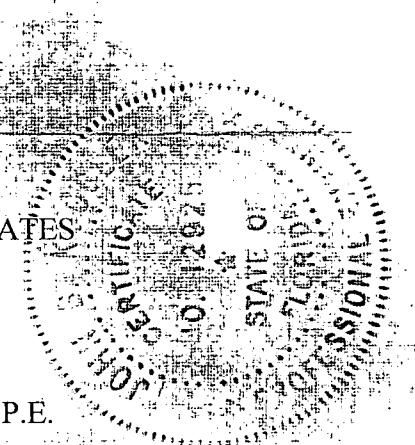
IMC will revise the permit application, as necessary, subsequent to your review of the enclosed information.

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

Very truly yours,

KOOGLER & ASSOCIATES


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



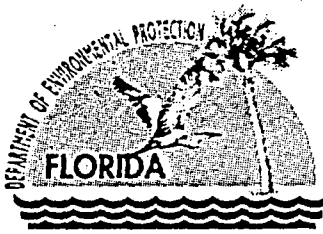
JBK:par
Encl.

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

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 FI 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

"More Protection, Less Process"

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