



Department of Environmental Protection

Jeb Bush Governor

May 20, 2004

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

Colleen M. Castille Secretary

CERTIFIED MAIL

Mr. M. A. Daigle, Vice President IMC Phosphates Company PO Box 2000 Mulberry, FL 33860

Re: Title V Permit Renewal Project 1050059-045-AV IMC Phosphates Company - New Wales Plant

Dear Mr. Daigle:

On April 22, 2004 the Department received your additional information for the renewal of the Title V permit for the IMC Phosphates Company New Wales Plant. The application is still incomplete. Specifically, the following information remains outstanding:

For each pollutant at each emissions unit that is subject to CAM, provide the test date, allowable operating capacity, operating capacity during the test, percentage of allowable operating capacity during the test, tested emissions rate, allowable emissions rate, percentage of allowable emissions rate measured during the test, maximum and minimum scrubber flow rates, maximum and minimum pressure drops across the scrubber(s). If the control device is a baghouse, provide the maximum and minimum pressure drop across the baghouse that assures compliance and is protective of the bags.

A minimum of five test results must be submitted for each emission unit's pollutant(s) in order to determine and justify the chosen indicator ranges.

The following units are subject to CAM for the pollutants specified and will need to provide the information requested above:

- -009 DAP #1 for PM
- -045 DAP II East for SO₂ and PM
- -046 DAP II West for SO₂ and PM
- -047 DAP II West Cooler for PM (baghouse)
- -056 DAP II East Cooler for PM
- -078 GMAP for PM
- -011 MAP Prill for PM
- -027 Animal feed granulation plant for PM
- -036 Multifos A & B Kilns, dryer and blending for PM and F
- -055 MAP Cooler for PM

Mr. M. A. Daigle May 20, 2004 Page 2 of 2

As a reminder, 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.

Please submit all requested information as soon as possible to me at FDEP Bureau of Air Regulation, MS 5505, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. If you have any questions regarding this request for additional information, please contact me at Cindy.Phillips@dep.state.fl.us or (850) 921-9534. To discuss the specific CAM requirements, please contact Mr. Jonathan Holtom at (850)921-9531 or Jonathan.Holtom@dep.state.fl.us.

Cindy C. Phillips

Cindy L. Phillips, P.E. Bureau of Air Regulation

cc: Jason Waters, FDEP-SWD

Jonathan Holtom, FDEP - DARM

Pradeep Raval, Consultant, Koogler and Associates John B. Koogler, PhD., P.E., Koogler and Associates

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Mr. M.A. Daigle, Vice President IMC Phosphate Company			
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