From: Pradeep Raval

To: Sheplak, Scott; "Iyer, Rama - FishHawk"

Cc: "David, Steve - Plymouth"; Arif, Syed; "Baig, Ghani A - New Wales"; "Jellerson, David - FishHawk"

Subject: RE: MOSAIC New Wales - Extension Request for BART Exemption Permit 1050059-061-AC

**Date:** Wednesday, June 19, 2013 11:02:11 AM

Scott: Thanks for the feedback.

I assume you will be extending the expiration date of Permit No. 1050059-061-AC as requested, in view of the RAI.

Regards,

Pradeep Raval KOOGLER AND ASSOCIATES, INC. 4014 NW 13TH STREET GAINESVILLE, FL 32609 CELL: 352-317-8635

DIRECT: 352-505-4559 OFFICE TEL: 352-377-5822

FAX: 352-377-7158

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**From:** Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]

Sent: Wednesday, June 19, 2013 10:31 AM

To: 'lyer, Rama - FishHawk'; praval@kooglerassociates.com

**Cc:** David, Steve - Plymouth; Arif, Syed; Baig, Ghani A - New Wales; Jellerson, David - FishHawk **Subject:** RE: MOSAIC New Wales - Extension Request for BART Exemption Permit 1050059-061-AC

Good morning Rama & Pradeep,

Fyi, I perused our current guidance. The circa May 24, 1995 memo was made obsolete by OGG-01 (see attached); PER-43 (attached) is valid & pertinent.

Scott

From: Iyer, Rama - FishHawk [mailto:Rama.lyer@mosaicco.com]

**Sent:** Tuesday, June 18, 2013 3:06 PM

To: Sheplak, Scott; <a href="mailto:praval@kooglerassociates.com">praval@kooglerassociates.com</a>

Cc: David, Steve - Plymouth; Arif, Syed; Baig, Ghani A - New Wales; Jellerson, David - FishHawk

Subject: RE: MOSAIC New Wales - Extension Request for BART Exemption Permit 1050059-061-AC

Scott,

Mosaic is providing the answers to the three questions in your email below as follows, following your numbering.

- 1. There are no more physical changes that need to be done under Permit No. 1050059-061-AC on the basis of Mosaic having formally chosen Scenario A.
- 2. No additional testing needs to be done.
- 3. We are requesting an extension of the expiration date of 061-AC from June 30, 2013 to December 31, 2013 due to the May 24, 1995 FDEP Guidance for Extending the Expiration Date of Construction Permits for Title V Sources memorandum which dwells upon 62-210.300(2)(a)3.a not having an effect on an air construction permits and goes on to say air construction permits should be extended. The May 24, 1995 memo is attached for your reference.

Mosaic would also like to add that with respect your questions number 1 and 2 and our answers, we are relying upon the Department's May 20, 2011 letter to Mr. Ron Yasurek, New Wales Facility Plant Manager, which acknowledges Mosaic informing the Department via letters dated February 2, 2011 and April 7, 2011 of, amongst other things, the installation of HRS tower, internal distribution header, external piping, economizer, superheater and an acid diluter vessel in SAP3 during the 2012 turnaround.

Sincerely,

Rama Iyer, P.E.
Sr. Engineer
Environmental Affairs
Mosaic Fertilizer, LLC | 13830 Ci

Mosaic Fertilizer, LLC | 13830 Circa Crossing Dr | Lithia, FL 33547 T: 813-500-6478 | C: 863-232-7094 | rama.iyer@mosaicco.com |

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From: Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]

**Sent:** Monday, June 17, 2013 2:19 PM **To:** praval@kooglerassociates.com

Cc: Iyer, Rama - FishHawk; David, Steve - Plymouth; Arif, Syed

Subject: RE: MOSAIC New Wales - Extension Request for BART Exemption Permit 1050059-061-AC

Pradeep,

Correct, Permit No. 1050059-061-AC (New Wales Facility, BART Exemption Project) expires on June 30, 2013 (the end of this month).

I spoke with Syed about your below request. We have a few questions. I briefly discussed these with you this afternoon.

Can Mosaic-New Wales follow up on these?

- 1. Are there any more physical changes that need to be done under Permit No. 1050059-061-AC?
- 2. Is there any additional testing that needs to be done under Permit No. 1050059-061-AC to demonstrate compliance?
- 3. Is the request merely to have a complete Title V permit revision application on file prior to Permit No. 1050059-061-AC's expiration?

Scott

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. <u>DEP Customer Survey</u>.

From: Pradeep Raval [mailto:praval@kooglerassociates.com]

Sent: Monday, June 17, 2013 12:47 PM

To: Sheplak, Scott; Arif, Syed

Cc: 'Rama Iyer'; 'David, Steve - Plymouth'

Subject: MOSAIC New Wales - Extension Request for BART Exemption Permit 1050059-061-AC

Scott: This is a follow up to our meeting last Friday regarding the processing of the 1050059-083-AV revision for Mosaic New Wales facility.

Per our discussion earlier today, the permit 1050059-061-AC (BART Exemption Project) will expire at the end of this month while the permit revision to incorporate it into the AV may take a few more months to process.

If the timeline is not critical to FDEP, please consider this email, on behalf of Mosaic, a request to extend the expiration date of the above AC from June 30, 2013 to December 31, 2013.

If a different format for the permit extension, such as extending it through the issuance of the revised AV is more practical for FDEP, please let us know and we can revise our permit extension request accordingly.

The additional time will allow the AC to be incorporated in to the AV before the AC expires.

If you have any questions, please feel free to call me or Rama.

Pradeep Raval KOOGLER AND ASSOCIATES, INC. 4014 NW 13TH STREET GAINESVILLE, FL 32609 CELL: 352-317-8635

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