



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

September 5, 2001

Mr. M. A. Daigle, General Manager  
IMC Phosphates Company  
P.O. Box 2000  
Mulberry, FL 33860-1100

Re: DEP File No. 1050059-033-AC (PSD-FL-244)  
Multifos Plant – Kiln A and B Scrubbing System Change

Dear Mr. Daigle:

The Department reviewed Koogler & Associates request on your behalf dated August 20, 2001 regarding a proposal for a change in the scrubbing system for the above referenced project.

The current caustic scrubbing system for Kilns A and B introduces caustic into the demist section of the cross-flow scrubber. This set-up was to be tried over a period of a year to evaluate any operational problems that may be encountered with this approach. This set-up of introducing caustic for sulfur dioxide emissions control into the demist section created serious plugging problems, from the likely reaction of pond water carry-over with the caustic in the de-mist section, prompting frequent replacement of scrubber packing. The build-up is determined to be a precipitate consisting of sodium, silica and fluoride. The replacement of scrubber packing has led to plant downtime.

Given these problems, and considering the fact that the set-up was a temporary one for evaluation purposes, the Department has no objections to IMC introducing the caustic in the duct after the de-mist section, as shown in the attached drawing. The permittee shall still comply with the caustic solution flow requirements as specified in Specific condition 7 of PSD-FL-244. With this scrubbing system change, the Department requests that IMC conduct sulfur dioxide emissions test using EPA Method 8 for information purposes only. The test shall be conducted with Kilns A and B operating at maximum capacity. Result of this test shall be sent to the Bureau of Air Regulation in Tallahassee for placement in the permittee's file. The test result shall be used for reference only and shall not be used for compliance or enforcement purposes.

If you have any questions regarding the Department's determination, please contact me at 850-921-9528.

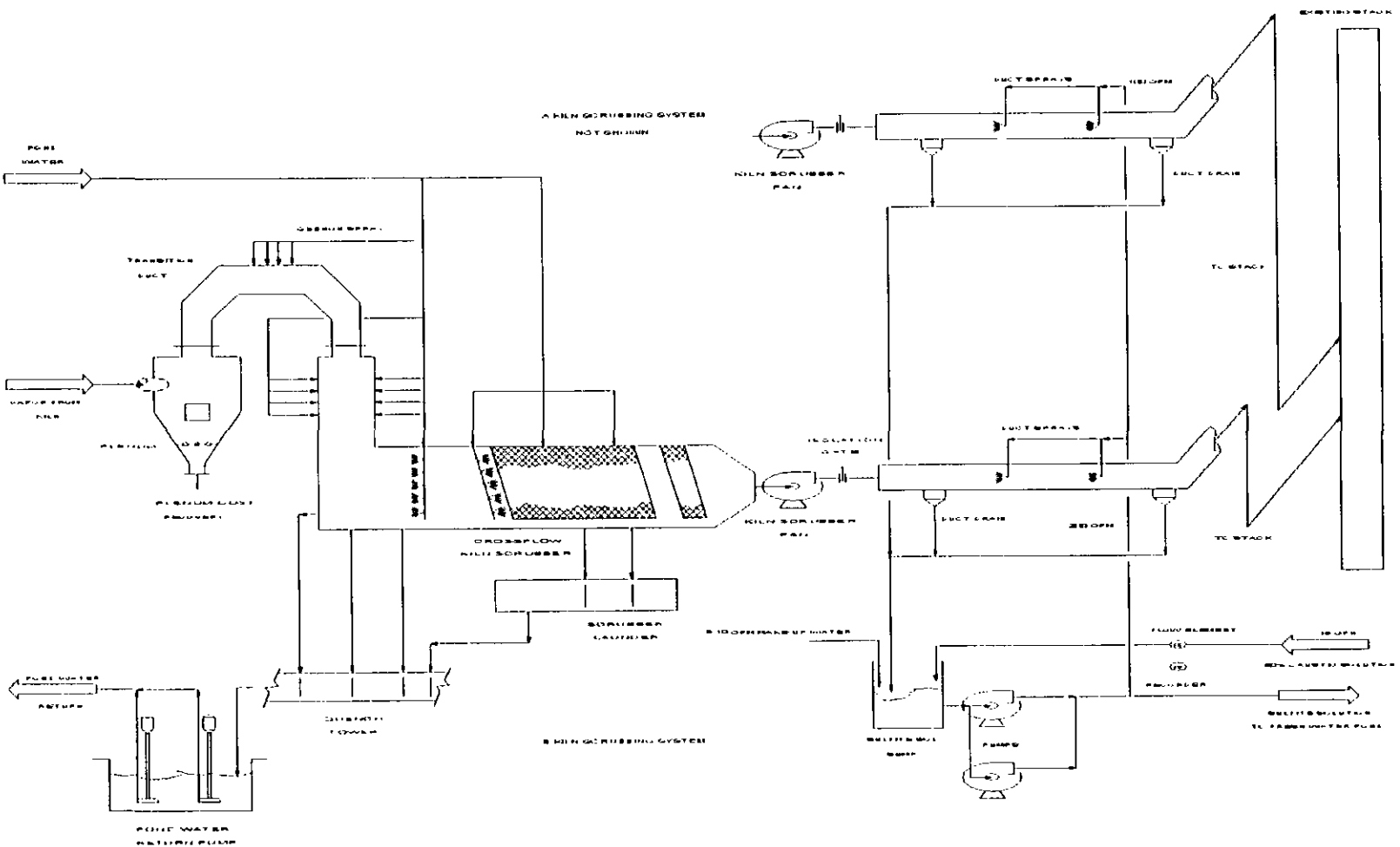
Sincerely,

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

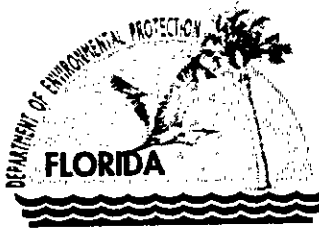
cc: Bill Thomas, DEP SWD  
John Koogler, Ph.D., P.E., Koogler & Associates  
Dave Turley, IMC

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*Printed on recycled paper.*



DATE	CDT	PROPOSED MULTIPHASE KILN C	IMC-ARIGO CO.
DATE	11/13/97	MODIFICATIONS TO AAB SCRUBBER SYSTEMS	NEW WALES
DATE	8/25/98		NONE
DATE			KILN02
DATE			LS



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# Department of Environmental Protection

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

David B. Struhs  
Secretary

February 6, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John B. Koogler, Ph.D., P.E.  
Koogler & Associates Environmental Services  
4014 N.W. 13<sup>th</sup> Street  
Gainesville, FL 32609

Re: Extension Request/DEP File No. 1050059-024-AC (PSD-FL-244)

Dear Mr. Koogler:

The Department reviewed your request dated January 23, 2002 to extend the expiration date of the construction permit from March 31, 2002 to December 31, 2002.

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.

We already have fairly extensive information about the facility and the control equipment. To complete the reasonable assurance requirement allowing extension of the permit, please submit the following information:

1. List any additional tasks to be performed to achieve "normal operating conditions" and the approximate dates for completing those tasks.
2. Identify additional production and emission testing that needs to be conducted and provide estimated dates for completion of those tasks.
3. Provide a statement (and basis for believing) that the facility will comply with applicable regulation.

According to Rule 62-4-080(3), the permit will remain in effect until the Department takes final action. 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,

A. A. Linero, P.E. Administrator  
New Source Review Section

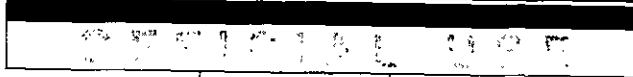
Cc: Bill Thomas, DEP SWD  
Dave Turley, IMC

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**John B. Koogler**  
 Street, Apt. No.  
 or P.O. No. **4014 NW 13th St.**  
 City, State, ZIP+4  
**Gainesville, FL 32609**

PS Form 3800, January 2001 See Reverse for Instructions

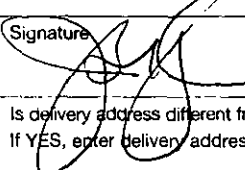
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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

John B. Koogler, Ph.D., P.E.  
 Koogler & Associates  
 Environmental Services  
 4014 N.W. 13th Street  
 Gainesville, FL 32609

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4. Restricted Delivery? (Extra Fee)  Yes

<sup>2</sup> 7001 0320 0001 3693 9341