



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
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KA 124-01-03

March 19, 2002

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BUREAU OF AIR REGULATION

Mr. A. L. Linero, 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)
Additional Information - Sulfuric Acid Production Increase
DEP File No. 1050059-036-AC, PSD-FL-325

Dear Mr. Linero:

The following additional information is in response to Mr. Syed Arif's telephone conversation with Pradeep Raval last month regarding information previously submitted to FDEP on January 25, 2002. The items are addressed in the order of the issues raised by FDEP.

1. The sulfuric acid plant production rates at the time of the sulfuric acid mist emission testing are summarized below.

Plant #	Year	Production (tpd)	SAM (lbs/hr)	SAM (lb/ton)
01	1999	2782	6	0.05
01	2000	2800	4	0.03
02	1999	2776	6	0.05
02	2000	2789	8	0.07
03	1999	2900	7	0.06
03	2001	2745	8	0.07

2. The modeling issues will be addressed after the ongoing discussions with Mr. Cleve Holladay are completed.

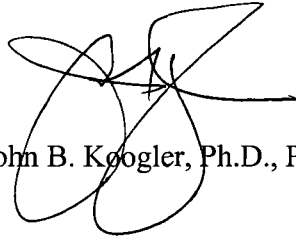
Mr. A.L. Linero, P.E.
Florida Department of
Environmental Protection

March 19, 2002

If you have any questions, please call me.

Very truly yours,

KOOGLER & ASSOCIATES

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

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

JBK:par.

c: T. Heron, FDEP
C. D. Turley, IMC
M. Daigle, IMC

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature

(seal)

Date

3/18/02

* Attach any exception to certification statement.