



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

December 7, 2001

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) **A**
Multifos Plant – Kiln C Permit Revision

Dear Mr. Koogler:

The Department reviewed your letter dated November 9, 2001 in which you submitted a cost proposal on installation of a venturi scrubber as part of the Kiln C scrubbing system.

The cost proposal submitted by Penn Pro is ambiguous as it uses the cost estimate submitted earlier for replacement with a Kimre Scrubber. It then adds the additional amount required for installation of a venturi scrubber. The attached letter of Penn Pro indicates that IMC would re-use the existing packing in the cross flow scrubber, and also mentions on the following page of installing the monorail system to pull the Kimre panels. The Department is interested of cost analysis under the scenario of using the existing cross flow scrubber and installing a venturi scrubber upstream of the cross flow scrubber. Please indicate if the cost analysis submitted represents this scenario, and if it does, why was the cost data used as provided for the Kimre Scrubber.

The Department in extending the expiration date of the Kiln C construction permit to March 31, 2002 accepted two approaches as possible methods to further reduce fluoride emissions in the existing system: 1) the source of pond water for the quench tower and the cross flow scrubber can be changed and 2) steam can be introduced in the transition section in order to retard any potential evaporation of the pond water. This testing was supposed to be completed by June 1, 2001, as indicated in IMC's letter to the Department of May 11, 2001. Please submit the results of the testing, and if the testing has not been completed, indicate the reasons for the delay.

Additionally, submit a detailed summary of all the tests conducted on C Kiln from the initial test until present time. The summary should include but not be limited to the date of the test, production rate of the kiln, emission results etc.

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

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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 Syed Arif, P.E. at 850/921-9528.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. A. Linero', written in a cursive style.

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

cc: Dave Turley, IMC
Bill Thomas, DEP-SWD

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C. Signature <i>[Signature]</i>							
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<p>1. Article Addressed to:</p> <p>Mr. John B. Koogler, Ph.D., P.E. Koogler & Associates Environmental Services 4014 N.W. 13th St. Gainesville, FL 32609</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type:</p> <table border="1"> <tr> <td><input checked="" type="checkbox"/> Certified Mail</td> <td><input type="checkbox"/> Express Mail</td> </tr> <tr> <td><input type="checkbox"/> Registered</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td><input type="checkbox"/> C.O.D.</td> </tr> </table> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	<input checked="" type="checkbox"/> Certified Mail	<input type="checkbox"/> Express Mail	<input type="checkbox"/> Registered	<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Insured Mail	<input type="checkbox"/> C.O.D.
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