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JUN 6 1989

June 6, 1989

DER-BAQM

OF COUNSEL  
W. ROBERT FOKES

BY HAND DELIVERY

Mr. Willard Hanks  
Division of Air Resources Management  
Florida Department of Environmental  
Regulation  
2600 Blair Stone Road, Room 338  
Tallahassee, Florida 32399-2400

Re: Central Phosphates, Inc.  
Plant City Phosphate Complex  
Construction Permit

Dear Willard:

On behalf of Central Phosphates, Inc., I would like to extend sincere thanks for your prompt attention to the application for construction permit submitted on May 25, 1989.

In order to promote expedited permit processing, we have taken the liberty of suggesting the attached changes to the draft permit and supporting documents. Our suggestions are provided in a strike-through/underscore format; proposed deletions are shown as stricken and proposed additions are underlined. The central issues of concern addressed by our suggested changes are as follows:


- We respectfully submit that a more accurate characterization of the permitted activity in the Intent to Issue would be: "alter an existing facility by adding a product cooler [etc]."
- The general permit conditions should conform with Rule 17-4.160, as amended on August 3, 1988.

Mr. Willard Hanks  
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- Installation of the cooler, absent "modification" (40 CFR §60.14) or "reconstruction" (40 CFR §60.15), does not trigger the Subpart V NSPS. We expect an EPA official to contact you shortly to confirm this interpretation of the regulations.
- We do not perceive a legal, technical, or environmental rationale for limiting particulate matter emissions to present actual emissions.

Again, we appreciate your willingness to write a draft permit and consider these issues on an expedited basis. Please let us know how you would like to proceed regarding resolution of the issues identified in this letter and attachments. We would be pleased to meet with you or confer by telephone.

Very truly yours,



James S. Alves

JSA/gb

Enclosures