



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

November 28, 2001

Mr. Gregg Worley, Chief  
Air Planning Branch  
U.S. EPA – Region IV  
61 Forsyth Street  
Atlanta, Georgia 30303

Re: IMC Phosphates MP, Inc. – New Wales Plant  
Sulfuric Acid Production Increase  
1050059-036-AC, PSD-FL-325

Dear Mr. Worley:

Enclosed for your review and comments is a confidential letter submitted by Koogler & Associates on behalf of IMC Phosphates. IMC proposes to modify the five existing sulfuric acid plants over the next few years in order to increase the sulfuric acid production rates. The modifications are a combination of maintenance and replacement of some equipment along with upgrading of the converters. A schedule of equipment repairs/replacements is included in the enclosed confidential letter.

The Company has requested input from EPA in identifying the items that constitute routine repair and maintenance in order to distinguish them from items that constitute modification. The proposed project does not involve any changes to the manufacturing process.

The Company requests that the Department and EPA keep the integrity of the enclosed confidential letter and file the letter appropriately. The complete application for this project is being sent to you under a separate cover. We would appreciate your early review and determination. Your comments can be forwarded to my attention at the letterhead address or faxed to me at (850) 922-6979. If you have any questions, please contact Syed Arif at (850) 921-9528.

Sincerely,

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

AAL/sa  
Enclosures

cc: S. Arif, BAR

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