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BUREAU OF AIR REGULATION

July 18, 2003



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IMC Phosphates Company
P.O. Box 2000
Mulberry, Florida 33860-1100
863.428.2500

Trina L. Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

**Subject: IMC Phosphates MP Inc. (New Wales)
Multifos Plant - Kiln C Permit Revisions
No. 1050059-024-AC, PSD-FL-244**

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Dear Ms. Vielhauer:

This is a response to your letter of June 26, 2003, which requested additional information relative to the above referenced construction permit. A response to Questions 1. and 2. has not been prepared at this time in accordance with a discussion between Syed Arif and Pradeep Raval (Koogler & Associates). Based on the outcome of the current project to install a venturi throat section between the two scrubbers, these issues will be addressed as necessary. Questions 3. and 4. are addressed below:

- 3. According to the AOR information submitted by IMC to the Department, the annual production from Kiln C for the years 2000 and 2001 were 43,685 and 75,439 tons, respectively. Additionally, the total operating hours for those two years were 6895 and 7994 hours, respectively. Please provide information as to how much production (tons) and operation (hours) were a direct consequence of different tests that were performed on Kiln C. What was the eventual outcome of the product produced in Kiln C?*

The tonnages reported in the AOR submittals were feed tons recorded to the Kiln, not production tonnages. The production for 2000 from Kiln C was 34,981 tons for the hours reported. Excluding the time period when C Kiln was operated as a dryer, the production in 2001 was 51,278 tons for 7629 hours. This would equate to 67,420 feed tons. The production and operating hours that were a direct consequence of testing in 2000 were 1,262 tons over about 120 hours. In 2001, production and operating hours that were a direct consequence of testing were 1,004 tons over about 120 hours. The outcome of the product produced in C Kiln was to supplement customer demand.

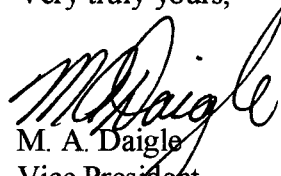
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4. *The Department understands that IMC received a proposal from Bionomic Industries, Inc., of Oceanside, California for scrubber retrofit costs to comply with the existing BACT limit for F. Please provide a copy of the proposal as well as any supporting documents.*

Based on contact with John Enhoffer at Bionomic Industries, Inc., there were several proposals made for projects at New Wales. The Multifos scrubbing system was only discussed generally and no specific proposal made for it.

If you have any questions or concerns at all regarding the above information, please do not hesitate to contact me or Dave Turley (863.428.7153).

Very truly yours,


M. A. Daigle
Vice President
Florida Concentrates

MAD :jp\rsp0626

cc : P. A. Steadham
C. D. Turley
Koogler & Associates
S. Crisp
G. Kissel