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August 15, 2003

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

RECEIVED

AUG 19 2003

BUREAU OF AIR REGULATION

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

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Dear Ms. Vielhauer:

It was a pleasure to meet with you and Department staff last week at IMC's New Wales facility to discuss the Multifos C Kiln testing program. We have made great strides in understanding the complex processes at work in the kiln system and believe that the installation and testing of new equipment will enable us to provide the Department with reasonable assurance of consistent compliance with fluoride emission limits under normal production conditions.

In accordance with the commitment made by IMC, within the next 90 days we will complete a rigorous engineering and design effort based on testing results. Our engineers will design and install equipment which will enable IMC to have a predictable operation of C Kiln while demonstrating the ability to consistently control fluoride emissions to a level below the PSD significance level of 3 TPY. Our optimism is based on the recent installation of an experimental venturi which has identified mechanisms that control fluoride emissions. As we stated to you at the meeting, we are dedicating sufficient human and physical resources to complete our evaluation prior to November 5, 2003.

We believe the program will provide fluoride emission data that will support a retroactive permit change to the fluoride emission limitation for the Multifos C Kiln to below the PSD significance level of 3 TPY. The fluoride emission measurements will be made using EPA Method 13b. A summary report on this program will be submitted as soon as possible, but no later than November 5, 2003, with interim reporting as appropriate.

During the program, IMC will determine the optimum venturi scrubber operating parameters needed to allow proper kiln operation under normal conditions. It is important that the tests be

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done under expected and permitted operating conditions to ensure valid and defensible emissions testing data. We hope to avoid repeated kiln shutdowns, start-ups, and other operational problems which create a greater potential of damage to the kiln. The test data and operation parameters will also be analyzed to identify any surrogate parameters that can also provide additional assurance of compliance. We are preparing and plan to submit an application for a revised fluoride emission limit for Multifos C Kiln to less than 3 TPY in the next few weeks.

Additionally, as discussed during our meeting, IMC is agreeable to a revision of the permitted maximum capacity of the Multifos C Kiln from 25 TPH to 17 TPH feed input. This revision would include a provision that adjusts the maximum permitted operating rate to 110 percent of the rate at which compliance is demonstrated by testing if less than the 17 TPH. This type of condition is presently included in the New Wales Title V Permit. The limit of 17 TPH is 110 percent of the demonstrated operation rate of the existing kilns. They are similar, if not identical, in design to the Multifos C Kiln.

The topic of the other emission testing specified by the construction permit arose at the end of our meeting. As an update, the NOx emissions from the Multifos C Kiln were determined to be 8.2 lb/hr. During the test, the Multifos C Kiln was operating at a production rate of 8 TPH with a heat input rate of 42 mmBtu/hr. This test was conducted on September 19, 2002 and the results were submitted to FDEP on October 20, 2002. The metal emissions from the Multifos C Kiln were 0.061 Cr, 0.0003 Ni, 0.021 Cd, and 0.001 Hg lb/hr. The kiln was operating at an input feed rate of 11.3 TPH. The test was conducted on April 3 and 4, 2000. The test results were submitted to FDEP on June 9, 2000. The fluoride emissions from the mixed feed storage building were determined to be an average emission rate of 0.01 lb/hr. The measurements were made April 5-7, 2000 and the report was also submitted to FDEP on June 9, 2000.

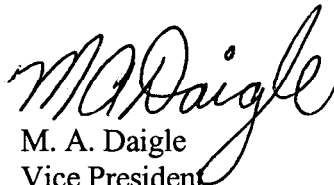
We are encouraged about the promising prospects of success in our operational and testing program. We feel close to fully understanding and controlling the production and emissions from the Multifos C Kiln. We would certainly welcome any input and advice from the Department regarding our testing program, systems or methods to consistently control fluoride emissions.

We would like to take this opportunity to thank you as well as Syed Arif, Al Linero, Bill Thomas (retired), Jerry Kissel, Sheila Schneider and Joel Smolen for your patience, understanding and guidance and for helping to bring these complex issues to an amicable conclusion.

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Please feel free to contact me if you have any questions or need additional information, or contact C. D. Turley at 863.428.7153 or P. A. Steadham at 863.428.7106.

Sincerely,


M. A. Daigle
Vice President
Florida Concentrates

MAD :jp

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