

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

October 24, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. M. A. Daigle
Vice President, Florida Concentrates
IMC Phosphates Company
P.O. Box 2000
Mulberry, FL 33860-1100

Re: Extension Request/DEP File No. 1050059-033-AC
Original Permit PSD-FL-244 (1050059-024)

Dear Mr. Daigle:

On July 23, 2003 the Department received your response (dated July 18) to our request for additional information dated June 26. The incompleteness letter related to the subject request received on July 10 from Koogler Associates to extend the original PSD permit for tricalcium phosphate animal feed (Multifos) Kiln C.

The July 18 response deferred answers to the first two questions based on the outcome of the project to install a venturi throat section between the two scrubbers. Because the permit extension request is for Kiln C as a PSD source, responses to those issues are still required to consider extension of the permit.

IMC submitted a separate application (received September 26) that requests substantial changes to the permit and apparently decided not to address the two questions regarding the extension that were outstanding. This letter is to remind IMC (as acknowledged in the July 18 letter) that the application to extend the PSD permit is still incomplete despite the information received in the separate application received on September 26.

For reference, the outstanding information items still required regarding are:

1. The original BACT determination refers to a separate neutralized scrubber pond for scrubber water for the three kilns. Please provide an estimate (\$/ton of F removal) on a non-incremental basis if a separate neutralized pond is to be used for Kiln C only. Preliminary costing was submitted to the Department via a facsimile on June 23, 2003. The costing is incomplete and should be resubmitted in the form requested.
2. All cost data submitted in the past should be re-evaluated and done on a non-incremental basis (total costs per total tons of F removed). Additionally, provide information on the selling price of the animal feed ingredient in \$/ton of product.

"More Protection, Less Process"

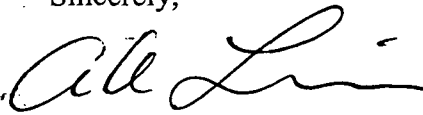
Printed on recycled paper.

According to Rule 62-4-080(3), the permit will remain in effect until the Department takes final action. 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 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.

Although we are reviewing the separate application, a response to the open questions is still required and is governed by the referenced provision. That means a response is required by January 22, 2004 unless the Department takes final action on the separate application that would moot the extension request.

If you have any questions regarding this matter, please call me at 850/921-9523.

Sincerely,



A. A. Linero, Administrator
New Source Review Program

AAL/aal

cc: Jerry Kissel, DEP-SWD
John Koogler, P.E., Koogler & Associates

U.S. Postal Service
CERTIFIED MAIL RECEIPT
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OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To
M. A. Daigle
Street, Apt. No.; or PO Box No.
PO Box 2000
City, State, ZIP+4
Mulberry, FL 33860-1100

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. M. A. Daigle
 Vice President, Florida Concentrates
 IMC Phosphates Company
 Post Office Box 2000
 Mulberry, FL 33860-1100

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery
 6-28-03

C. Signature
 X *Joe Howard* Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. 7001 0320 0001 3692 5658

PS Form 3811, July 1999

Domestic Return Receipt

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 Mulberry, FL 33860-1100

PS Form 3800, January 2001

See Reverse for Instructions

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PS Form 3800, May 2000 See Reverse for Instructions

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PS Form 3811, July 1999

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