



IMC

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Return Receipt Requested

al- FYI Howard 10/3
Willie C. Tims, Jr.
Vice President, Environmental
Health & Safety

RECEIVED

OCT 03 2002

DIVISION OF AIR
RESOURCES MANAGEMENT

October 1, 2002

Gerald Kissel
Professional Engineer III
Division of Air Resources Management
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619-8318

RE: DAP II East and West Units
Title V No. 1050059-014-AV
New Wales Plant, IMC Phosphates

Dear Mr. Rhodes:

Thank you for meeting with us on September 12, 2002 to discuss our concerns relating to the results of our most recent internal audit of IMC's New Wales Facility. As discussed during our meeting, the company is concerned about the variability surrounding the DAP II East and West units, and their associated air emission control devices. Accordingly, IMC submitted a Title V Compliance Certification Supplement and is expeditiously implementing a three-tiered program that will alleviate any issues regarding the compliance status of the DAP II East and West units.

As indicated during our meeting, we are focusing on the West plant at this time, however, since the plants are similar we believe the solutions identified for West can be applied to the East. A schedule detailing this review process is attached. We will keep the Department fully updated on our progress and any schedule changes. Please do not hesitate to contact us if you have any additional questions or comments.

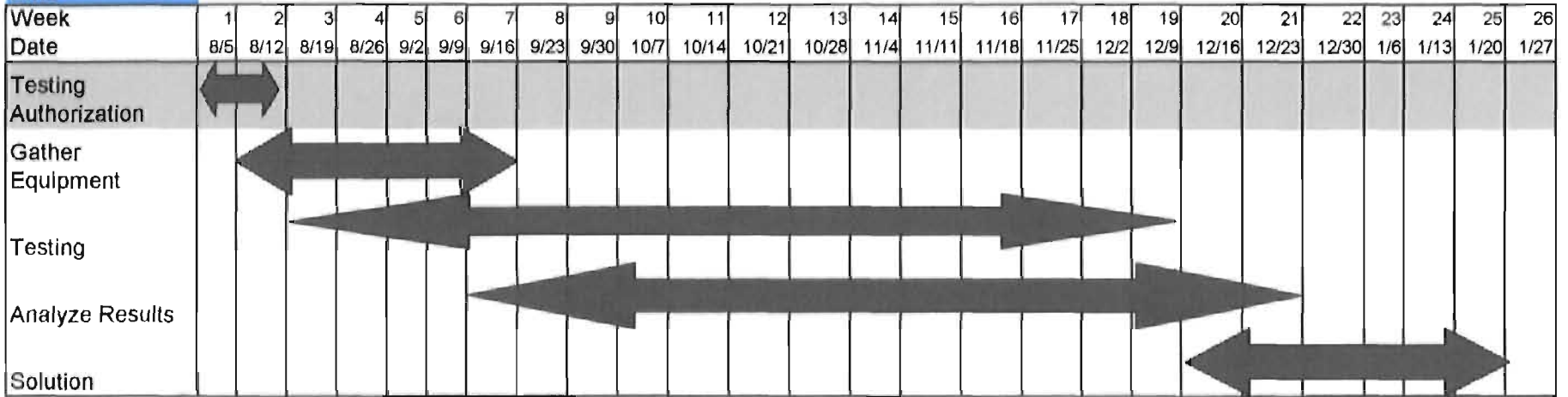
Sincerely,

Willie C. Tims, Jr.

Attachment

xc: **Howard L. Rhodes**
Division Director
Division of Air Resources Management
Florida Department of Environmental Protection
2600 Blair Stone road MS 5500
Tallahassee, Florida 32399-2400

**DAP2W
Scrubber
Project:
Estimated Time
Line**



30-Sep-02