



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

July 6, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: IMC South Pierce Converter Replacement (Facility ID 1050055)

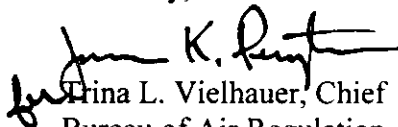
Dear Mr. Daigle:

The Department reviewed the additional information received in response to our request for preliminary design information regarding the replacement catalyst and bed dimensions.

Since the dimensions are similar, and since IMC stated in a letter dated April 23, 2004 submitted by Koogler and Associates that the type and quantity of catalyst used in the new converter will be exactly the same (463,500 liters of standard vanadium catalyst) as that for the existing converter, this project can be considered as a like kind replacement. If the type or quantity of catalyst is changed in the future, the change will have to be reviewed by the Department.

If there are any questions, please call John Reynolds at 850/921-9530.

Sincerely,


Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV:JR

cc: Jerry Kissel, SWD
Dr. John Koogler, K&A

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City, State, ZIP-4 Mulberry, Florida 33860-1100	

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 Mr. M.A. Daigle
 Vice President
 Concentrate
 IMC Phosphate Company
 Post Office Box 2000
 Mulberry, Florida 33860-1100

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