



June 4, 2014

Via Email

Jeff Koerner, Administrator
Air Permitting and Compliance Program
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399
Jeff.koerner@dep.state.fl.us

RE: Argos Newberry Cement Plant
Facility ID No.: 0010087
Response to "Opening for Cause Letter" and Request for
Permit Revision and Correction

Dear Jeff:

As we have discussed, the Argos Newberry Cement Plant is subject to the emission guidelines under 40 CFR 60 Subpart DDDD, incorporated by under Rule 62-204.800, Florida Administrative Code, and this should be reflected in our air permit. In addition, and consistent with the Department's April 9th letter, the compliance date under 40 CFR 63 Subpart LLL is now September 7, 2015. While the new deadline is effective as a matter of law, the Title V permit should be revised to reflect the appropriate compliance date. As requested by the Department, we have carefully reviewed the facility's Title V permit to note where the corrections should be made. In our review, we have noted other corrections that should also be made. A marked-up version of the Title V permit is attached for your review and consideration.

Argos Cement LLC formally requests that the Department revise the Title V permit, and to the extent appropriate, to issue an air construction permit under parallel processing to accomplish the following:

- A. Reflect the applicability of the emission guidelines under 40 CFR 60 Subpart DDDD to Emission Units 003 and 010 (the in-line aw mill/kiln line systems for lines 1 and 2);
- B. Reflect the non-applicability of 40 CFR 63 Subpart LLL to these two Emission Units (003 and 010);
- C. Reflect the current requirements of 40 CFR 63 Subpart LLL applicable to Emission Units 2, 4, 5, 6, 8, 9, 11, 12, 13, and 14;
- D. Correct the name of the current owner and operator throughout the permit, consistent with Permit No. 0010087-048-AV; and,
- E. Correct provisions throughout the permit to ensure that they appropriately reflect the applicable requirements of prior air construction permits and the Department's current rules.

As noted in the Department's April 9th letter, Rule 62-213.430(4), Florida Administrative Code, provides that the Department will revise Title V permits when a source becomes subject to new regulatory requirements. Because of the regulatory applicability determination inherent in this request and because of the substantive nature of the corrections and changes, Argos Cement LLC respectfully requests that the Department's Division of Air Resource Management issue the construction permit and revised Title V air operation permit with involvement, as appropriate, by the Northeast District Office.

As the new owner of the Newberry Cement Plant, Argos Cement LLC sincerely appreciates the Department's cooperation and willingness to work with us to ensure that all applicable requirements are appropriately and correctly reflected in the facility's air permits. If you have any questions regarding the suggested revisions, if you need additional information to complete your review, or if you would like to schedule a meeting or a telephone conference for further discussions, please let me know so I can immediately respond. Thank you again for your time and efforts, and for your responsiveness to our requests.

Sincerely,

Argos Cement LLC



William Voshell

US Environmental Director

Attachment

cc: Richard Rachal, DEP NE District, Richard.rachal@dep.state.fl.us
David Read, Florida DEP DARM, david.read@dep.state.fl.us
Hastings Read, Florida DEP DARM, hastings.read@dep.state.fl.us
Al Linero, Florida DEP DARM, Alvaro.linero@dep.state.fl.us
Max Lee, Koogler and Associates, mlee@kooglerassociates.com
Angela Morrison, Esq., angela@morrisonlaw.com



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

| | |
|--|--|
| 1. Facility Owner/Company Name: Argos Cement LLC | |
| 2. Site Name: Argos Newberry Cement Plant | |
| 3. Facility Identification Number: 0010087 | |
| 4. Facility Location... Street Address or Other Locator: 4000 NW CR 235 City: Newberry County: Alachua Zip Code: 32669 | |
| 5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

Application Contact

| | |
|--|--|
| 1. Application Contact Name: Max Lee, Ph.D, P.E. | |
| 2. Application Contact Mailing Address... Organization/Firm: Koogler and Associates, Inc Street Address: 4014 NW 13th Street City: Gainesville State: Florida Zip Code: 32609 | |
| 3. Application Contact Telephone Numbers... Telephone: (352) 377 - 5822 ext. 19 Fax: (352) 377 - 7158 | |
| 4. Application Contact E-mail Address: mlee@kooglerassociates.com | |

Application Processing Information (DEP Use)

| | |
|------------------------------------|-----------------------------------|
| 1. Date of Receipt of Application: | 3. PSD Number (if applicable): |
| 2. Project Number(s): | 4. Siting Number (if applicable): |

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

The Argos Newberry Cement Plant is subject to the emission guidelines under 40 CFR 60 Subpart DDDD, incorporated by under Rule 62-204.800, Florida Administrative Code, and this should be reflected in the Title V permit. In addition, and consistent with the Department's April 9th letter, the compliance date under 40 CFR 63 Subpart LLL is now September 9, 2015, not September 9, 2013. While the new deadline is effective as a matter of law, the Title V permit should be revised to reflect the appropriate compliance date. As requested by the Department in the April 9th letter, we have carefully reviewed the facility's Title V permit to note where the corrections should be made. In our review, we have noted other corrections that should also be made. A marked-up version of the Title V permit is attached for your review and consideration.

Argos Cement LLC formally requests that the Department revise the Title V permit, and to the extent appropriate, to issue an air construction permit under parallel processing to accomplish the following:

- A. Reflect the applicability of the emission guidelines under 40 CFR 60 Subpart DDDD to Emission Units 003 and 010 (the in-line kiln/raw mill systems for lines 1 and 2);
- B. Reflect the non-applicability of 40 CFR 63 Subpart LLL to these two Emission Units (003 and 010);
- C. Reflect the current requirements of 40 CFR 63 Subpart LLL applicable to Emission Units 2, 4, 5, 6, 8, 9, 11, 12, 13, and 14;
- D. Correct the name of the current owner and operator throughout the permit, consistent with Permit No. 0010087-048-AV;
- E. Correct provisions throughout the permit to ensure that they appropriately reflect the applicable requirements of prior air construction permits and the Department's current rules.

Scope of Application

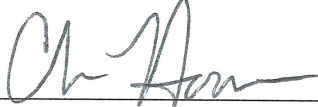

| Emissions Unit ID Number | Description of Emissions Unit | Air Permit Type | Air Permit Proc. Fee |
|---|---|-----------------|----------------------|
| 001 002 003 004 005 006 007 008 009 010 011 012 013 014 017 | EU 001- Raw Material Handling and Storage. EU 002- Raw Mill System Line 1 EU 003- Kiln System Line 1. EU 004- Clinker Handling Line 1. EU 005- Finish Grinding Operation Line EU 006- Cement Handling, Loading, and Bagging Operation EU007- Coal Handling and Grinding Operation Line EU008- Clinker-to-Railcar/ Truck Transfer Conveyor Common Conditions (EU- 002, 003, 004, 009, 010 & 011) Common Conditions (EU- 001-014) Common Conditions (EU- 002-006, 008-013) EU009- Raw Mill System- Line EU010- In line Kiln/Raw Mill- Line 2 EU 011- Clinker Handling- Line 2 EU 012- Finish Grinding Operation- Line 2 EU 013- Cement Load-Out Silos 6 & 7 EU 014- Coal Handling - Mill 2 EU017 Three Emergency Engines | NA | NA |
| | | | |

Application Processing Fee

Check one: Attached - Amount: \$_____ Not Applicable

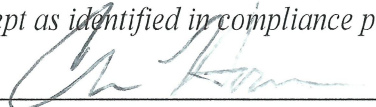

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

| |
|---|
| 1. Owner/Authorized Representative Name : Chris Horner |
| 2. Owner/Authorized Representative Mailing Address. Argos Cement LLC Street Address: 4000 NW CR 235 City: Newberry State: Florida Zip Code: 32669 |
| 3. Owner/Authorized Representative Telephone Numbers... Telephone: (352) 472 -4722 ext. 130 Fax: (352) 472 -2449 |
| 4. Owner/Authorized Representative E-mail Address: CHorner@argos-us.com |
| 5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>  _____ Signature  _____ Date |

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the “application responsible official” need not be the “primary responsible official.”

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| 1. Application Responsible Official Name: Chris Horner |
| 2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source. |
| 2. Owner/Authorized Representative Mailing Address... Organization/Firm: Argos Cement LLC Street Address: 4000 NW CR 235 City: Newberry State: Florida Zip Code: 32669 |
| 4. Application Responsible Official Telephone Numbers. Telephone: (352) 472 -4722 ext. 130 Fax: (352) 472 -2449 |
| 5. Application Responsible Official E-mail Address: CHorner@argos-us.com |
| 6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  _____ Signature  _____ Date |

Professional Engineer Certification

| |
|--|
| 1. Professional Engineer Name: Max Lee, Ph.D. P.E. Registration Number: 58091 |
| 2. Professional Engineer Mailing Address... Organization/Firm: Koogler and Associates, Inc. Street Address: 4014 NW 13th Street City: Gainesville State: Florida Zip Code: 32609 |
| 3. Professional Engineer Telephone Numbers... Telephone: (352) 377-5822 ext.19 Fax: (352) 377-7158 |
| 4. Professional Engineer E-mail Address: mlee@kooglerassociates.com |
| 5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> Signature _____ Date <u>6/3/14</u> (seal) |

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

| | | | |
|---|--------------------------------------|--|------------------------------------|
| 1. Facility UTM Coordinates... Zone 17 346.4 East (km) 3285.7 North (km) | | 2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 29°57'45" Longitude (DD/MM/SS) 82°51'03" | |
| 3. Governmental Facility Code: 0 | 4. Facility Status Code: A | 5. Facility Major Group SIC Code: 32 | 6. Facility SIC(s): 3241 |
| 7. Facility Comment : None | | | |

Facility Contact

| |
|---|
| 1. Facility Contact Name: Henry Gotsch - Environmental Manager |
| 2. Facility Contact Mailing Address... Organization/Firm: Argos Cement LLC Street Address: 4000 NW CR 235 City: Newberry State: Florida Zip Code: 32669 |
| 3. Facility Contact Telephone Numbers: Telephone: 352-472-4722 ext. 121 Fax: 352-472-2449 |
| 4. Facility Contact E-mail Address: OGotsch@argos-us.com |

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I that is not the facility "primary responsible official."

| |
|--|
| 1. Facility Primary Responsible Official Name: |
| 2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code: |
| 3. Facility Primary Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () - |
| 4. Facility Primary Responsible Official E-mail Address: |

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

| | |
|--|---|
| 1. <input type="checkbox"/> Small Business Stationary Source | <input checked="" type="checkbox"/> Unknown |
| 2. <input type="checkbox"/> Synthetic Non-Title V Source | |
| 3. <input checked="" type="checkbox"/> Title V Source | |
| 4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs) | |
| 5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs | |
| 6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs) | |
| 7. <input type="checkbox"/> Synthetic Minor Source of HAPs | |
| 8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60) | |
| 9. <input checked="" type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60) | |
| 10. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63) | |
| 11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5)) | |
| 12. Facility Regulatory Classifications Comment: | |

List of Pollutants Emitted by Facility

| 1. Pollutant Emitted | 2. Pollutant Classification | 3. Emissions Cap [Y or N]? |
|------------------------|-----------------------------|----------------------------|
| PM | A | N |
| PM₁₀ | A | N |
| SO₂ | A | N |
| NO_x | A | N |
| CO | A | N |
| HAPS | A | N |
| VOC | B | N |
| SAM | B | N |
| H114 | B | N |
| | | |

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

| 1. Pollutant Subject to Emissions Cap | 2. Facility-Wide Cap [Y or N]? (all units) | 3. Emissions Unit ID's Under Cap (if not all units) | 4. Hourly Cap (lb/hr) | 5. Annual Cap (ton/yr) | 6. Basis for Emissions Cap |
|---|--|---|-----------------------|------------------------|----------------------------|
| N/A | | | | | |
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| 7. Facility-Wide or Multi-Unit Emissions Cap Comment: | | | | | |

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

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|---|
| 1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: <u> N/A </u> <input type="checkbox"/> Previously Submitted, Date: _____ |
| 2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: <u> N/A </u> <input type="checkbox"/> Previously Submitted, Date: _____ |
| 3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: <u> N/A </u> <input type="checkbox"/> Previously Submitted, Date: _____ |

Additional Requirements for Air Construction Permit Applications

| |
|--|
| 1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility) |
| 2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility) |
| 3. Rule Applicability Analysis: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility) |
| 4. List of Exempt Emissions Units: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable |
| 5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable |
| 6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable |
| 7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable |
| 8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable |
| 9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable |
| 10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable |

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units:

Attached, Document ID: _____ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities: (Required for initial/renewal applications only)

Attached, Document ID: _____ Not Applicable

2. Identification of Applicable Requirements: (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought)

Attached, Document ID: _____

Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan: (Required for all initial/revision/renewal applications)

Attached, Document ID: _____

Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only)

Attached, Document ID: _____

Equipment/Activities Onsite but Not Required to be Individually Listed

Not Applicable

5. Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only)

Attached, Document ID: _____ Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:

Attached, Document ID: _____ Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program

1. Acid Rain Program Forms:

Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable (not an Acid Rain source)

Phase II NO_x Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable

New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable

2. CAIR Part (DEP Form No. 62-210.900(1)(b)):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable (not a CAIR source)

3. Hg Budget Part (DEP Form No. 62-210.900(1)(c)):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable (not a Hg Budget unit)

Additional Requirements Comment