



RECEIVED

June 23, 1998

JUN 29 1998

D E P

Mr. William Schroeder  
Air Permitting Engineer  
FDEP Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

**SUBJECT:** Coronet Industries, Inc.  
Hillsborough County – Air Permit  
DEP File No. 0570075-009

Dear Mr. Schroeder:

This letter shall provide the additional information requested in your letter dated May 21, 1998. All questions have been reproduced, preserving your numbering. Responses follow each question.

- 1. **Since there is a considerable contribution to sulfur dioxide emissions from sulfates in the phosphate rock, what steps will be taken to provide assurance that variations in rock quality do not cause emission higher than specified in the application.**

Response

Although the rock quality reportedly does vary, the total sulfur content in the phosphate rock has insignificant variation.

- 2. **Information from past Annual Operating Reports, supplied by Hillsborough County EPC, show that the increases requested for sulfur dioxide, particulate matter, and fluorine emissions exceed the amounts required for PSD analysis. Please address this issue.**

Response

The emissions increases resulting from the increase in feed rate (from 18.0 tons/hour to 24.3 tons/hour) were evaluated prior to the issuance of permit No. 0570075-006-AC. The increase in production rate was not subject to PSD review, because there were no federally enforceable limitations on production rate.

The current request to amend permit No. 0570075-006-AC requests only a slight increase in permitted heat input – no changes to production rate are requested. The current application represents a minor modification to a major source – therefore PSD review is not applicable.

Prior "actual" emissions are set equal to "allowable" emissions under permit No. 0570075-006-AC. This is because the plant has not operated at the rate authorized by permit No. 0570075-006-AC, and there is no representative emissions data for this production rate. The

*1/24/98  
copy of the  
INCIN LETTER  
REFERENCED IN  
LETTER TO  
DEP 6/15/98  
W/S*

emissions increases will be only those increases resulting from the increased fuel use. The current request involves no increase in the permitted emission rates for particulate matter and fluoride emissions, with respect to permit No. 0570075-006-AC. Therefore, only sulfur dioxide increases resulting from the requested increase in fuel use are to be considered. Also, the sulfur content of natural gas is generally considered insignificant, so the sulfur dioxide emissions are only considered with respect to the use of No. 2 fuel oil.

Permit No. 0570075-006-AC	Requested by Applicant, 0570075-009
Heat Input = 110.91 MMBtu/hr Hours = 8760 hrs/yr Fuel Heat Content = 141 MMBtu/10 <sup>3</sup> gal. Gallons/yr = 110.91 * 8760/141 = 6891 x 10 <sup>3</sup>	Heat Input = 128.0 MMBtu/hr Hours = 8760 hrs/yr Fuel Heat Content = 141 MMBtu/10 <sup>3</sup> gal. Gallons/yr = (Synthetic Limit) = 7591 x 10 <sup>3</sup>
Increase in fuel use (gal/yr) = 7591 x 10 <sup>3</sup> - 6891 x 10 <sup>3</sup> = 700 x 10 <sup>3</sup>	
SO2 Emission Factor = 142(%S) lbs/10 <sup>3</sup> gal, at 0.5% S = 71 lbs/10 <sup>3</sup> gal	
Increase in SO2 Emission Rate = 71 lbs/10 <sup>3</sup> gal x 700 x 1.0 ton/2000 lbs = 25 TPY	

It is important to note that the annual fuel oil use has been synthetically limited to reduce permitting fees – not to avoid PSD review. The requested heat input level without the synthetic limitation would still result in a less than significant increase in SO2 emissions.

The emissions increase for sulfur dioxide would be only that resulting from the requested increase in fuel oil use. This increase would be less than the PSD significant emission rate.

**3. Please quantify the increase in emissions from the Feed Preparation section, materiel transfer and handling, and loading of product for transport**

**Response**

The emissions increases resulting from the increase in feed rate (from 18.0 tons/hour to 24.3 tons/hour) were evaluated prior to the issuance of permit No. 0570075-006-AC. The increase in production rate was not subject to PSD review, because there were no federally enforceable limitations on production rate.

The current application does not involve an increase in production rate for Feed Preparation, material handling and transfer, and product loading; with respect to permit No. 0570075-006-AC.

---

Letter to W. Schroeder – FDEP/SWD  
Coronet Industries, Inc. – Kilns 6 & 7  
Page 3 of 3

Please contact me if further information is required.

Sincerely,

A handwritten signature in black ink, appearing to read 'S.C. Cullen', with a stylized flourish at the end.

Steven C. Cullen, P.E.  
Koogler & Associates

copy to: Frank Sweat – Coronet Industries



# Department of Environmental Protection

## DIVISION OF AIR RESOURCES MANAGEMENT

### APPLICATION FOR AIR PERMIT - LONG FORM

D.E.R.  
APR 22 1998  
SOUTHWEST DISTRICT  
TAMPA  
*project 009*

See Instructions for Form No. 62-210.900(1)

#### I. APPLICATION INFORMATION

This section of the Application for Air Permit form identifies the facility and provides general information on the scope and purpose of this application. This section also includes information on the owner or authorized representative of the facility (or the responsible official in the case of a Title V source) and the necessary statements for the applicant and professional engineer, where required, to sign and date for formal submittal of the Application for Air Permit to the Department. If the application form is submitted to the Department using ELSA, this section of the Application for Air Permit must also be submitted in hard-copy.

#### Identification of Facility Addressed in This Application

Enter the name of the corporation, business, governmental entity, or individual that has ownership or control of the facility the facility site name, if any; and the facility's physical location. If known, also enter the facility identification number.

1. Facility Owner/Company Name: <b>Coronet Industries, Inc.</b>	
2. Site Name: <b>Plant City Facility</b>	
3. Facility Identification Number: <b>0570075</b> <input type="checkbox"/> Unknown	
4. Facility Location: Street Address or Other Locator: <b>4082 Coronet Road</b> City: <b>Plant City</b> County: <b>Hillsborough</b> Zip Code: <b>33566</b>	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official: <b>Vincent T. Scialli -- President &amp; Chief Operating Officer</b>
2. Owner/Authorized Representative or Responsible Official Mailing Address:  Organization/Firm: <b>Coronet Industries, Inc.</b> Street Address: <b>P.O. Box 760</b> City: <b>Plant City</b> State: <b>FL</b> Zip Code: <b>33564-0760</b>
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: <b>(813) 752-1161</b> Fax: <b>(813) 754-2182</b>
4. Owner/Authorized Representative or Responsible Official Statement:  <i>I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. 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. 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 any permitted emissions unit.</i>  <p>_____ Signature <i>Vincent T. Scialli</i></p> <p>_____ Date <i>April 14, 1998</i></p>

\* Attach letter of authorization if not currently on file.

**Scope of Application**

This Application for Air Permit addresses the following emissions unit(s) at the facility. An Emissions Unit Information Section (a Section III of the form) must be included for each emissions unit listed.

Emissions Unit ID	Description of Emissions Unit	Permit Type
005	Defluorinating Kilns #6 and #7	ACIE

**Purpose of Application and Category**

Check one (except as otherwise indicated):

**Category I: All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.**

This Application for Air Permit is submitted to obtain:

- Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.
- Initial air operation permit under Chapter 62-213, F.A.C., for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: \_\_\_\_\_

- Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operation permit to be renewed: \_\_\_\_\_

- Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: \_\_\_\_\_

Operation permit to be revised: \_\_\_\_\_

- Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. Also check Category III.

Operation permit to be revised/corrected: \_\_\_\_\_

- Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit to be revised: \_\_\_\_\_

Reason for revision: \_\_\_\_\_

\_\_\_\_\_

**Category II: All Air Operation Permit Applications Subject to Processing Under Rule 62-210.300(2)(b), F.A.C.**

This Application for Air Permit is submitted to obtain:

- Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s): \_\_\_\_\_

- Renewal air operation permit under Rule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.

Operation permit to be renewed: \_\_\_\_\_

- Air operation permit revision for a synthetic non-Title V source. Give reason for revision; e.g., to address one or more newly constructed or modified emissions units.

Operation permit to be revised: \_\_\_\_\_

Reason for revision: \_\_\_\_\_

**Category III: All Air Construction Permit Applications for All Facilities and Emissions Units**

This Application for Air Permit is submitted to obtain:

- Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).

Current operation permit number(s), if any: AO29-218851 & 0570075-006-AC

- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s): \_\_\_\_\_

- Air construction permit for one or more existing, but unpermitted, emissions units.



**Application Processing Fee**

Check one:

Attached - Amount: **\$1000**

Not Applicable.

**Construction/Modification Information**

1. Description of Proposed Project or Alterations:

**The proposed project will increase the production rates and fuel usage rates described in permit AO29-218851.**

**The proposed project will update and amend permit 0570075-006-AC. The additional fluoride recovery equipment and electrostatic precipitators described in the AC will not be installed.**

2. Projected or Actual Date of Commencement of Construction: **Upon DEP Approval**

3. Projected Date of Completion of Construction: **No Construction Required**

**Professional Engineer Certification**

1. Professional Engineer Name: **Steven C. Cullen, P.E.**  
Registration Number: **45188**

2. Professional Engineer Mailing Address:

Organization/Firm: **Koogler & Associates**

Street Address: **4014 NW 13th Street**

City: **Gainesville**

State: **FL**

Zip Code: **32609**

3. Professional Engineer Telephone Numbers:

Telephone: **(352) 377-5822**

Fax: **(352) 377-7158**

4. Professional Engineer Statement:

*I, the undersigned, hereby certify, except as particularly noted herein\*, that:*

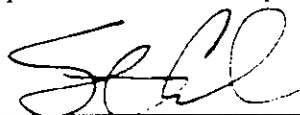
*(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and*

*(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.*

*If the purpose of this application is to obtain a Title V source air operation permit (check here [ ] 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 schedule is submitted with this application.*

*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [ X ] 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.*

*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ] 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.*



\_\_\_\_\_  
Signature

April 9, 1998

Date

(seal)

\* Attach any exception to certification statement.

**Application Contact**

1. Name and Title of Application Contact: <b>Steve Cullen - Project Engineer</b>		
2. Application Contact Mailing Address:  Organization/Firm: <b>Koogler &amp; Associates</b> Street Address: <b>4014 NW 13th Street</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32609</b>		
3. Application Contact Telephone Numbers: Telephone: <b>(352) 377-5822</b> Fax: <b>(352) 377-7158</b>		

**Application Comment**

## II. FACILITY INFORMATION

### A. GENERAL FACILITY INFORMATION

#### Facility Location and Type

1. Facility UTM Coordinates: Zone: <b>17</b> East (km): <b>393.8</b> North (km): <b>3096.3</b>			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): <b>27/59/21</b> Longitude (DD/MM/SS): <b>82/04/57</b>			
3. Governmental Facility Code: <b>0</b>	4. Facility Status Code: <b>A</b>	5. Facility Major Group SIC Code: <b>20</b>	6. Facility SIC(s): <b>2048</b> <b>2819</b>
7. Facility Comment (limit to 500 characters):  <p><b>Animal feed defluorination facility. A proprietary mixture of phosphate rock, phosphoric acid, and soda ash is defluorinated in kilns and calciners before use as an animal feed supplement. The final product is called CDP (Coronet Defluorinated Product).</b></p> <p><b>Fluorine compounds are recovered from kiln and calciner exhaust gases, and are used to produce various fluoride salts (potassium fluoborate [KBF<sub>4</sub>] and others) in the fluoride salts plant.</b></p>			

#### Facility Contact

1. Name and Title of Facility Contact: <b>Samuel Franklin Sweat - Environmental Affairs Manager</b>	
2. Facility Contact Mailing Address: Organization/Firm: <b>Coronet Industries, Inc.</b> Street Address: <b>P.O. Box 760</b> City: <b>Plant City</b> State: <b>FL</b> Zip Code: <b>33564-0760</b>	
3. Facility Contact Telephone Numbers: Telephone: <b>(813) 719-7255</b> Fax: <b>(813) 754-8558</b>	

**Facility Regulatory Classifications**

1. Small Business Stationary Source? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unknown
2. Title V Source? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3. Synthetic Non-Title V Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
4. Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5. Synthetic Minor Source of Pollutants Other than HAPs? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
6. Major Source of Hazardous Air Pollutants (HAPs)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
7. Synthetic Minor Source of HAPs? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
8. One or More Emissions Units Subject to NSPS? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9. One or More Emission Units Subject to NESHAP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
10. Title V Source by EPA Designation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
11. Facility Regulatory Classifications Comment (limit to 200 characters):     

**B. FACILITY REGULATIONS**

**Rule Applicability Analysis** (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

NA

**List of Applicable Regulations** (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

<b>Title V Core List</b>	
<b>Rule 62-4, F.A.C.</b>	
<b>Rule 62-210, F.A.C.</b>	
<b>Rule 62-213, F.A.C.</b>	
<b>Rule 62-297, F.A.C.</b>	
<b>Rule 62-296, F.A.C.</b>	
<b>40 CFR 60, Appendix A</b>	
<b>Hillsborough County EPC Rules Chapter 1-1</b>	
<b>Hillsborough County EPC Rules Chapter 1-3</b>	

**C. FACILITY POLLUTANTS**

**Facility Pollutant Information**

1. Pollutant Emitted	2. Pollutant Classification
PM	A
PM10	A
NOX	A
SO2	A
CO	A
FL	B



**D. FACILITY POLLUTANT DETAIL INFORMATION**

**Facility Pollutant Detail Information:** Pollutant \_\_\_\_\_ of \_\_\_\_\_

1. Pollutant Emitted: NA
2. Requested Emissions Cap: _____ (lb/hour) _____ (tons/year)
3. Basis for Emissions Cap Code:
4. Facility Pollutant Comment (limit to 400 characters):

**Facility Pollutant Detail Information:** Pollutant \_\_\_\_\_ of \_\_\_\_\_

1. Pollutant Emitted:
2. Requested Emissions Cap: _____ (lb/hour) _____ (tons/year)
3. Basis for Emissions Cap Code:
4. Facility Pollutant Comment (limit to 400 characters):

## E. FACILITY SUPPLEMENTAL INFORMATION

### Supplemental Requirements for All Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested <b>On File with Department</b>
2. Facility Plot Plan: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested <b>On File with Department</b>
3. Process Flow Diagram(s): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested <b>On File with Department</b>
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
6. Supplemental Information for Construction Permit Application: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

### Additional Supplemental Requirements for Category I Applications Only

7. List of Proposed Exempt Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. List of Equipment/Activities Regulated under Title VI:  <input type="checkbox"/> Attached, Document ID: _____  <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed  <input checked="" type="checkbox"/> Not Applicable
9. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

<p>11. Identification of Additional Applicable Requirements:  <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>12. Compliance Assurance Monitoring Plan:  <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>13. Risk Management Plan Verification:</p> <p><input type="checkbox"/> Plan Submitted to Implementing Agency - Verification Attached,  Document ID: _____</p> <p><input type="checkbox"/> Plan to be Submitted to Implementing Agency by Required Date</p> <p><input checked="" type="checkbox"/> Not Applicable</p>
<p>14. Compliance Report and Plan:  <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>15. Compliance Certification (Hard-copy Required):  <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>

### III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through L as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application. Some of the subsections comprising the Emissions Unit Information Section of the form are intended for regulated emissions units only. Others are intended for both regulated and unregulated emissions units. Each subsection is appropriately marked.

#### A. TYPE OF EMISSIONS UNIT (Regulated and Unregulated Emissions Units)

##### Type of Emissions Unit Addressed in This Section

1. Regulated or Unregulated Emissions Unit? Check one:

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

2. Single Process, Group of Processes, or Fugitive Only? Check one:

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

**B. GENERAL EMISSIONS UNIT INFORMATION  
(Regulated and Unregulated Emissions Units)**

**Emissions Unit Description and Status**

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters):  <b>Defluorinating Kilns #6 &amp; #7</b>		
2. Emissions Unit Identification Number: 005 [ <input type="checkbox"/> ] No Corresponding ID [ <input type="checkbox"/> ] Unknown		
3. Emissions Unit Status Code: A	4. Acid Rain Unit? [ <input type="checkbox"/> ] Yes [ <input checked="" type="checkbox"/> ] No	5. Emissions Unit Major Group SIC Code: 20
6. Emissions Unit Comment (limit to 500 characters):  <b>Kilns #6 &amp; #7 defluorinate prepared feed from the feed preparation area of the facility.</b>		

**Emissions Unit Control Equipment**

A.

1. Description (limit to 200 characters): <b>Gas Scrubber (General, Not Classified)</b>  <b>Tellerett Packed Bed Tail Gas Scrubber</b>
2. Control Device or Method Code: <b>013</b>

**Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]**

**B.**

1. Description (limit to 200 characters): **Gravity Collector - Low Efficiency**

**Low Velocity Duct**

2. Control Device or Method Code: **006**

**C.**

1. Description (limit to 200 characters): **Spray Towers**

**(2) Fluoride recovery spray towers in series**

2. Control Device or Method Code: **052**

**C. EMISSIONS UNIT DETAIL INFORMATION  
(Regulated Emissions Units Only)**

**Emissions Unit Details**

1. Initial Startup Date: NA		
2. Long-term Reserve Shutdown Date: NA		
3. Package Unit: NA		
Manufacturer:		Model Number:
4. Generator Nameplate Rating: NA		MW
5. Incinerator Information: NA		
	Dwell Temperature:	°F
	Dwell Time:	seconds
	Incinerator Afterburner Temperature:	°F

**Emissions Unit Operating Capacity**

1. Maximum Heat Input Rate: Natural Gas = 120.0 mmBtu/hr No. 2 Fuel Oil = 128.0 mmBtu/hr		
2. Maximum Incineration Rate: NA	lb/hr	tons/day
3. Maximum Process or Throughput Rate: 24.30 tons/hour of prepared feed input 0570075-006-AC, SC 3		
4. Maximum Production Rate: NA		
5. Operating Capacity Comment (limit to 200 characters):		
<p><b>Increase in heat input rate for natural gas and fuel oil.</b></p> <p>AO29-218851: Gas = 94.46 mmBtu/hr; No. 5 fuel oil = 100.82 mmBtu/hr                  0570075-006-AC: Gas = 103.91 mmBtu/hr; No. 5 fuel oil = 110.91 mmBtu/hr</p>		

**Emissions Unit Operating Schedule**

Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	8760 hours/year

**D. EMISSIONS UNIT REGULATIONS  
(Regulated Emissions Units Only)**

**Rule Applicability Analysis** (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

NA



**Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]**

**List of Applicable Regulations** (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

62-296.403(1)(h), FAC	
40 CFR 60.14(e)	
62-296.700(2)(b), FAC	
62-296.320(4)(b), FAC	

**E. EMISSION POINT (STACK/VENT) INFORMATION  
(Regulated Emissions Units Only)**

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram: <b>Stack, Kilns 6 &amp; 7</b>	
2. Emission Point Type Code: <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
3. Descriptions of Emissions Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): NA	
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:  <b>Kilns 6 &amp; 7 are described as one emissions unit (005) with a common stack.</b>	
5. Discharge Type Code: <input type="checkbox"/> D <input type="checkbox"/> F <input type="checkbox"/> H <input type="checkbox"/> P <input type="checkbox"/> R <input checked="" type="checkbox"/> V <input type="checkbox"/> W	
6. Stack Height:	150 feet
7. Exit Diameter:	5.8 feet
8. Exit Temperature:	104°F

**Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]**

9. Actual Volumetric Flow Rate:	95400 acfm
10. Percent Water Vapor :	15%
11. Maximum Dry Standard Flow Rate:	75750 dscfm
12. Nonstack Emission Point Height: NA	feet
13. Emission Point UTM Coordinates: Zone:                      East (km):                      North (km):	
14. Emission Point Comment (limit to 200 characters): NA	

**F. SEGMENT (PROCESS/FUEL) INFORMATION**  
 (Regulated and Unregulated Emissions Units)

**Segment Description and Rate:** Segment 1 of 3

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters):  <b>Food &amp; Agriculture: Other Not Classified</b>  <b>(Defluorination of prepared feed)</b>	
2. Source Classification Code (SCC): <b>3-02-999-99</b>	
3. SCC Units: <b>Tons Processed</b>	
4. Maximum Hourly Rate: <b>24.3 Tons Processed</b>	5. Maximum Annual Rate: <b>212,868 Tons Processed</b>
6. Estimated Annual Activity Factor: <b>NA</b>	
7. Maximum Percent Sulfur: <b>NA</b>	8. Maximum Percent Ash: <b>NA</b>
9. Million Btu per SCC Unit: <b>NA</b>	
10. Segment Comment (limit to 200 characters):  <b>24.3 TPH x 8760 HPY = 212868 Tons Processed</b>  <b>0570075-006-AC, SC 3</b>	

**Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]**

**Segment Description and Rate:** Segment 2 of 3

<p>1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters):</p> <p><b>In-Process Fuel Use: Natural Gas</b></p>	
<p>2. Source Classification Code (SCC): <b>3-90-006-99</b></p>	
<p>3. SCC Units: <b>Million Cubic Feet (MMcf) Burned</b></p>	
<p>4. Maximum Hourly Rate: <b>0.114 MMcf Burned</b></p>	<p>5. Maximum Annual Rate: <b>1001 MMcf Burned</b></p>
<p>6. Estimated Annual Activity Factor: <b>NA</b></p>	
<p>7. Maximum Percent Sulfur: <b>NA</b></p>	<p>8. Maximum Percent Ash: <b>NA</b></p>
<p>9. Million Btu per SCC Unit: <b>1050 MMBtu/MMcf</b></p>	
<p>10. Segment Comment (limit to 200 characters):</p> <p><b>Max. heat input = 120 MMBtu/hr</b>  <b>1050 Btu/cf = 1050 MMBtu/MMcf</b>  <b>Hourly rate = 120 MMBtu/hr x 1.0 MMcf/1050 MMBtu = 0.114 MMcf</b>  <b>Annual = 0.114 MMcf x 8760 hrs/yr = 1001 MMcf Burned</b></p>	

**Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]**

**Segment Description and Rate:** Segment  3  of  3

<p>1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters):</p> <p><b>In-Process Fuel Use: Distillate Oil</b></p> <p><b>(#2 fuel oil is permitted as an alternate fuel)</b></p>	
<p>2. Source Classification Code (SCC): <b>3-90-005-99</b></p>	
<p>3. SCC Units: <b>Thousand Gallons Burned</b></p>	
<p>4. Maximum Hourly Rate: <b>0.91 Thousand Gallons Burned</b></p>	<p>5. Maximum Annual Rate: <b>7591 Thousand Gallons Burned</b></p>
<p>6. Estimated Annual Activity Factor: <b>NA</b></p>	
<p>7. Maximum Percent Sulfur: <b>0.5</b></p>	<p>8. Maximum Percent Ash: <b>NA</b></p>
<p>9. Million Btu per SCC Unit: <b>141 MMBtu/Thousand Gallons Burned</b></p>	
<p>10. Segment Comment (limit to 200 characters):</p> <p><b>141,000 Btu/gallon = 141 MMBtu/Thousand Gallons Burned</b>  <b>Hourly rate = 128 MMbtu/hr x 1.0 TGB/141 MMBtu = 0.91 TGB</b>  <b>Annual = Synthetically limited to 7591 thousand gallons/year</b></p>	

Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]

**G. EMISSIONS UNIT POLLUTANTS  
(Regulated and Unregulated Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	010	006	EL
PM10	010	006	NS
NOX			NS
SO2	0	013	EL
FL	052	013	EL
CO			NS

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

**Pollutant Detail Information: Pollutant 1 of 3**

1. Pollutant Emitted: PM	
2. Total Percent Efficiency of Control:	99 %
3. Potential Emissions:	13.81 lb/hour                      60.5 tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3                      _____ to _____ tons/year	
6. Emission Factor: 13.81 lbs/hr Reference: 0570075-006-AC, SC #12	
7. Emissions Method Code: <input checked="" type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5	
8. Calculation of Emissions (limit to 600 characters):  Hourly = 13.81 lbs/hr Annual = 13.81 lbs/hr x 8760 hrs/yr ÷ 2000 lbs/ton = 60.5 tpy	
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):	



**Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]**

**Allowable Emissions** (Pollutant identified on front of page)

**A.**

1. Basis for Allowable Emissions Code: <b>ESCRACT</b>		
2. Future Effective Date of Allowable Emissions: <b>NA</b>		
3. Requested Allowable Emissions and Units: <b>NA</b>		
4. Equivalent Allowable Emissions:	<b>13.81 lb/hour</b>	<b>60.5 tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Method 5</b>		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):  <b>Rule basis = 62-296.700(2)(b), FAC</b>		

**B. (NA)**

1. Basis for Allowable Emissions Code:		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hr	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

**Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]**

**Pollutant Detail Information: Pollutant 2 of 3**

1. Pollutant Emitted: <b>FL</b>		
2. Total Percent Efficiency of Control:		%
3. Potential Emissions:	3.2 lb/hour	14.0 tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3      _____ to _____ tons/year		
6. Emission Factor: <b>0.37 lb/ton of P2O5 = 3.2 lbs/hr</b> Reference: <b>62-296.403(1)(h), FAC and 0570075-006-AC, SC #11</b>		
7. Emissions Method Code: <input checked="" type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
8. Calculation of Emissions (limit to 600 characters):  <b>24.3 TPH of feed = 8.66 TPH P2O5</b> <b>8.66 TPH x 0.37 lb/ton = 3.2 lbs/hr</b> <b>Annual = 3.2 lbs/hr x 8760 hrs/yr ÷ 2000 lbs/ton = 14.0 tpy</b>		
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):		

**Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]**

**Allowable Emissions** (Pollutant identified on front of page)

**A.**

1. Basis for Allowable Emissions Code: <b>RULE</b>		
2. Future Effective Date of Allowable Emissions: <b>NA</b>		
3. Requested Allowable Emissions and Units: <b>NA</b>		
4. Equivalent Allowable Emissions:	<b>3.2 lb/hour</b>	<b>14.0 tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Method 13A or 13B</b>		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):  <b>Rule basis = 62-296.403(1)(h), FAC</b>		

**B. (NA)**

1. Basis for Allowable Emissions Code:		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hr	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

**Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]**

**Pollutant Detail Information: Pollutant 3 of 3**

1. Pollutant Emitted: <b>SO2</b>		
2. Total Percent Efficiency of Control:		%
3. Potential Emissions:	<b>210.41 lb/hour</b>	<b>908.1 tons/year</b>
4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3      _____ to _____ tons/year		
6. Emission Factor: <b>142(%S) lbs/thousand gallons burned</b> Reference: AP42, 5th Edition, Table 1.3-2		
7. Emissions Method Code: <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
8. Calculation of Emissions (limit to 600 characters):  <u>Fuel Oil</u> Hourly = (142 x 0.5) lbs/TGB x 0.91 TGB/hr = 64.61 lbs/hr Annual = 7591 TGB/yr x (142 x 0.5) lbs/TGB ÷ 2000 lbs/ton = 269.5 tpy  <u>Feed</u> Approximately 6.0 lb/ton of feed @ 24.3 tph = 145.8 lb/hr @ 212,868 tpy = 638.6 tpy		
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):  $\Delta$ SO2 = 908.1 TPY - 884.3 TPY = 23.8 TPY Annual No. 2 fuel oil use is synthetically limited to 7591 thousand gallons burned.		

**Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]**

**Allowable Emissions** (Pollutant identified on front of page)

**A.**

1. Basis for Allowable Emissions Code: <b>OTHER</b>
2. Future Effective Date of Allowable Emissions: NA
3. Requested Allowable Emissions and Units: <b>0.5% Sulfur in #2 Oil</b>
4. Equivalent Allowable Emissions: <b>210.41 lb/hour</b> <b>908.1 tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>Fuel Oil Analysis</b>
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):  <b>Annual No. 2 fuel oil use is synthetically limited to 7591 thousand gallons burned. This is to limit the increase of potential SO2 emissions below 25 TPY, to incur a lower permit processing fee.</b>

**B. [NA]**

1. Basis for Allowable Emissions Code:
2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:
4. Equivalent Allowable Emissions: <b>lb/hr</b> <b>tons/year</b>
5. Method of Compliance (limit to 60 characters):
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):

**Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]**

**I. VISIBLE EMISSIONS INFORMATION  
(Regulated Emissions Units Only)**

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: <b>VE20</b>
2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other <b>Rule 62-296.320(4)(b), FAC</b>
3. Requested Allowable Opacity: Normal Conditions: <b>20%</b> Exceptional Conditions: <b>%</b> Maximum Period of Excess Opacity Allowed: <b>min/hour</b>
4. Method of Compliance: <b>EPA Method 9</b>
5. Visible Emissions Comment (limit to 200 characters):

**Visible Emissions Limitation:** Visible Emissions Limitation \_\_\_\_\_ of \_\_\_\_\_ (NA)

1. Visible Emissions Subtype:
2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: <b>%</b> Exceptional Conditions: <b>%</b> Maximum Period of Excess Opacity Allowed: <b>min/hour</b>
4. Method of Compliance:
5. Visible Emissions Comment (limit to 200 characters):

**Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]**

**J. CONTINUOUS MONITOR INFORMATION (NA)  
(Regulated Emissions Units Only)**

**Continuous Monitoring System:** Continuous Monitor \_\_\_\_\_ of \_\_\_\_\_

1. Parameter Code: NA	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer:	Serial Number:
Model Number:	
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	

**Continuous Monitoring System:** Continuous Monitor \_\_\_\_\_ of \_\_\_\_\_

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer:	Serial Number:
Model Number:	
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	

**K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT  
TRACKING INFORMATION  
(Regulated and Unregulated Emissions Units)**

**PSD Increment Consumption Determination**

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip remaining statements.

- ] The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.
- ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.
- ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.
- ] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.
- ] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.



**Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]**

2. Increment Consuming for Nitrogen Dioxide?

If the emissions unit addressed in this section emits nitrogen oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check first statement, if any, that applies and skip remaining statements.

- ] The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.
- ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.
- ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.
- ] For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.
- ] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3. Increment Consuming/Expanding Code:			
PM	<input type="checkbox"/> ] C	<input type="checkbox"/> ] E	[ X ] Unknown
SO2	<input type="checkbox"/> ] C	<input type="checkbox"/> ] E	[ X ] Unknown
NO2	<input type="checkbox"/> ] C	<input type="checkbox"/> ] E	[ X ] Unknown
4. Baseline Emissions:			
PM	lb/hour	tons/year	
SO2	lb/hour	tons/year	
NO2		tons/year	
5. PSD Comment (limit to 200 characters): <b>Both kilns installed in 1970</b>			

L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION  
(Regulated Emissions Units Only)

Supplemental Requirements for All Applications

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested <b>Department has on file</b>
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested <b>Department has on file</b>
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested <b>Department has on file</b>
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____  <input type="checkbox"/> Previously submitted, Date: _____  <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]

**Additional Supplemental Requirements for Category I Applications Only**

10. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Acid Rain Application (Hard-copy Required)  <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____  <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____  <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____  <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____  <input checked="" type="checkbox"/> Not Applicable