South Alabama Gin Company
dba West Florida Gin & Warehouse Company
Facility ID No.: 0330136
Escambia County

Air Operation Permit
Permit No.: 0330136-006-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740
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Florida Department of Environmental Protection

Northwest District
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Pensacola, Florida 32502-5740

Rick Scott
Governor

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Herschel T. Vinyard Jr.
Secretary

Permittee:
South Alabama Gin Company
dba West Florida Gin & Warehouse Company

Permit No.: 0330136-006-AO
Facility ID No.: 0330136
SIC No(s).: 07, 0724
Project: Air Operation Permit

This permit modification is for the operation of the West Florida Gin & Warehouse facility located at 6291 Meadows Road, Walnut Hill, Escambia County; UTM Coordinates: Zone 16, 453.36 km East and 3427.89 km North; Latitude: 30° 59' 07" North and Longitude: 87° 29' 36" West.

STATEMENT OF BASIS: This air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Effective Date: January 3, 2014
Modification Date: September .12, 2014.
Renewal Application Due Date: November 4, 2018
Expiration Date: January 3, 2019

/S/

J. Charles Harp
Program Administrator
Waste Management/Air Resources
Northwest District

JCH/aj/r

Section I. Facility Information.
This is a modification of permit 0330136-005-AO effective January 3, 2014 for equipment upgrades to improve the efficiency and reduce electrical consumption. These modifications will affect the operations of the cyclone separators and will reduce the loading on the dust house, but will not affect the overall capacity and rates of the ginning operation.

A description of the upgrades follows:

1. The two incline cleaners which come after the second stage cleaning on the process flow diagram will be replaced by one incline cleaner. Fan F8 will be replaced with a larger fan and fan F9 will be removed. The discharge from the new fan F8 will be split and piped to both cyclones C4 and C5. The current operation had F8 discharge piped to C5 and F9 discharge piped to C5.
2. The Gin Stand machines on lines 1b and 1c will be replaced with one machine (1b). The existing 1a and the new 1b strand machine will continue to use the same fan and cyclone (F11 and C7)
3. Lint Cleaners 1b and 1c will be replaced with one new lint cleaner. The fans associated with 1b and 1c (F14 and F15) will be removed and a new F15 will be installed for the new machine. This new fan will continue to discharge into the dust house.
4. Lint cleaning system 2a, b, and c are no-longer needed and will be removed.
5. With the removal of the lint cleaning system 2, the associated mote system will no longer be needed. This mote system will become a spare system for lint clean system 1. Therefore, cyclone C9 will become an installed spare.

Subsection A. Facility Description.
This facility consists of a raw cotton unloading system, a seed cotton cleaning system, a lint cotton handling system, and a trash/mote system. This facility accepts seed cotton (dirty cotton from the fields) and processes it by drying, cleaning, and baling the cleaned (lint) cotton as finished product. Seed cotton is pneumatically conveyed through dryers, gins, and cleaners to remove seeds and trash. Particulate matter (PM) emissions from these systems are controlled by cyclones. Propane gas-fired heaters are used to dry the seed cotton during the unloading and conveying operations.

The unloading process is primarily modular. Cotton modules are unloaded from trucks and conveyed through a feed separator to seed cotton cleaning. The separator conveys the seed cotton to one of two cleaning lines with particulate emissions (PM) controlled by cyclone C-1. Seed cotton may be pneumatically unloaded by manual suction and conveyed to seed cotton cleaning. Particulate emissions associated with pneumatically unloading would be controlled by cyclone C-6; however, this system is not normally used and cyclone C-6 is used as a spare.

Seed cotton is processed through the 1st and 2nd stage (primary & secondary) tower dryers, inclined screen cleaners and stick machines. Heated air (produced by the facility's three propane gas-fired heaters) is used to dry and convey seed cotton to the primary and secondary inclined screen cleaners and through the stick machines. Particulate emissions associated with the seed cotton cleaning process are controlled by cyclones C-2 and C-3 for primary cleaning, cyclones C-4 and C-5 for secondary cleaning.

Cleaned dried cotton is fed to a conveyor distributor system feeding gin stands 1, 2, and 3, which separate the seed, trash, and fibers from the lint cotton. Excess cotton falls into an overflow separator and is returned to the distribution conveyor. Particulate emissions from the distribution conveyor are controlled by the facility's dust house while emissions from the gin stands are controlled by cyclone C-7.

Lint cotton fibers from the gin stands are pneumatically conveyed to six lint cleaners (a series of two for each gin stand) where trash is combed from the fibers. Particulate emissions from the lint cleaners are controlled by the facility's dust house.

The lint cotton fibers are conveyed to the battery condenser, which collects the fibers to be baled as cleaned (lint) cotton. Particulate emissions from the condenser are controlled by the facility's dust house.

Trash from the lint cleaners is pneumatically conveyed to cyclones C-8 and C-9. The trash from these cyclones or mote is then processed through an incline press and packaged as a sellable by-product. Emissions from the incline press are controlled by cyclone C-10. Cyclones C-1, C-2, C-3, C-4, C-5, C-6, C-7 and C-10 have their trash routed to cyclone C-11 and then to the trash stacker.

The facility operates three 3 MMBtu/hr propane gas fired air heaters for drying cotton during the unloading and drying processes.

Unit Designation	Size	Description
Heater #1	3 MM Btu/hr heat input	Propane gas-fired air heater, unloading
Heater #2	3 MM Btu/hr heat input	Propane gas-fired air heater, cleaning
Heater #3	3 MM Btu/hr heat input	Propane gas-fired air heater, cleaning
Total Heat Input:	9 MM Btu/hr	

These conveying/drying operation air heaters have a total heat input of 9 MMBtu per hour and are exempt from permitting by Rule 62-210.300(3)(a)33., F.A.C., because these external combustion heating units are fired exclusively with propane gas and have a total heat input capacity equal to or less than 10 million Btu per hour.

The facility is a minor source. The annual throughput limit is 60,000 bales of finished product per year, and total operating hours are limited to 3,000 hours per year. These permit limits were established to limit emissions of particulate matter (PM) to less than 100 tons per year and keep this facility from becoming a major source (Title V).

Based on the permit application received September 4, 2014, this facility is not a major source of hazardous air pollutants (HAP).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
008	Cotton Ginning Operation

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

<u>These documents are on file with permitting authority:</u>
Permit Application (EPSAP No.3865-1) received September 4, 2014
Additional Information Request dated September 5, 2014
Additional Information Response received September 10, 2014

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. All listed Appendices are part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance as described at 40 CFR Part 6, Appendix A-4, adopted and incorporated by reference at Rule 62-204.800, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standards contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests that identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us.
[Rule 62-297.310(7)(b), F.A.C.]

5. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rules 62-204.800, and 62-257, F.A.C.]

6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, VOC or OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
[Rule 62-296.320(1), F.A.C.]
{Permitting Note: Nothing is deemed necessary and ordered at this time.}

7. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include**:**

a) Application of water or other suppressants to unpaved roads to control emissions.
b) All cotton is processed (ginned) inside the process building.

c) All trash from this operation is transferred via air through cyclones to control emissions.
d) Enclosure or covering conveyor systems.

[Rule 62-296.320(4)(c), F.A.C., and permit 0330136-004-AC]

8. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit a permit renewal application using the current version of the renewal form along with the processing fee established in Rule 62-4.050(4), F.A.C., to the Northwest District Office of the Department. You can obtain a permit application form or apply for permit renewal electronically at the following web address: http://www.dep.state.fl.us/air/rules/forms/application.htm . [Rule 62-4.090, F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Waste Management/Air Resources Program
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850.595.8300; Fax: 850.595.8393

Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us.

10. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850.595.8300, day or night, and for emergencies involving a significant threat to human health or the environment is 800.320.0519. For routine business, telephone 850.595.8300 during normal working hours. [Rules 62-210.700, and 62-4.130, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emission unit.

E.U. ID No.	**Brief Description**
008	Cotton Ginning Operation

This emission unit consists of a raw cotton unloading system, a seed cotton cleaning system, a lint cotton handling system, and a trash/mote system. Seed cotton is pneumatically conveyed through dryers, gins, and cleaners to remove seeds and trash. Cleaned (lint) cotton is baled as the final product. Propane gas-fired heaters are used to dry the seed cotton during unloading and conveying operations.

Particulate matter emissions from the cotton ginning operation are controlled by cyclones. The various process steps use cyclones in different sizes and configurations to remove trash and particulate matter from exhausted air. The trash collected by the cyclones or mote is then processed through an incline press and packaged as a sellable by-product. Ginning operations and associated cyclones are summarized below.

Raw Cotton Unloading		
Cyclone	**Diameter (inches)**	**Process**
C-1	60	Unloading System / Cotton Feed Separator
C-6	36	Spare - Module Feeder Trash (from pneumatic unloading process)

Seed Cotton Cleaning		
Cyclone	**Diameter (inches)**	**Process**
C-2, C-3	60	1st Stage Seed Cotton Cleaning and Drying A & B
C-4, C-5	52	2nd Stage Seed Cotton Cleaning and Drying A & B
C-7	36	Gin system – Gin Stand Trash

Lint Cotton Handling (Emissions controlled by Dust House with five stacks with weather caps)		
Equipment	**Diameter (inches)**	**Process**
Dust House	12	Cotton Distribution Conveyor Overflow Separator
Dust House	29	Lint Cleaners 1a, & 1b
Dust House	N/A	Battery Condenser

Mote Handling, Mote Trash, and Trash Spreader		
Cyclone	**Diameter (inches)**	**Process**
C-8	42	Mote Handling A (preparation before screening and packaging)
C-9	42	Spare
C-10	32	Mote Trash (trash from mote incline screening)
C-11	48	Trash Spreader

Note: Additional information for these control devices is documented in Appendix Schedule of Devices (Rev 9-9-14).

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The maximum allowable operating rate of the cotton gin is 30 bales of lint cotton (500 lbs per bale of finished product) per hour.
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; and permit 0330136-004-AC]

{Permitting Note: Capacity is currently limited to 22 bales of lint cotton per hour based on the compliance test conducted November 14, 2013. When an emission unit is tested at less than the maximum permitted capacity, subsequent emission unit operation is limited to 110 percent of the test rate until a new test is conducted to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]}

A.2. Methods of Operation. The maximum annual throughput shall not exceed 60,000 bales of lint cotton (finished product) per 12-consecutive-month period (year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A.3. Hours of Operation. The hours of operation for this emissions unit shall not exceed 3,000 hours per 12-consecutive month period (year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; and permit 0330136-004-AC]

Emission Limitations and Standards

A.4. Visible Emissions. Visible emissions shall be less than 20 percent opacity.
[Rule 62-296.320(4)(b)1. F.A.C. and permit AC17-219056]

Test Methods and Procedures

A.5.a. Compliance Tests. Visible Emissions (VE) tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The visible emissions tests shall be conducted in accordance with EPA Method 9 for 30 minutes. Testing shall be conducted once each federal fiscal year (October 1 - September 30) on one cyclone from each group servicing the Raw Cotton Unloading; Seed Cotton Cleaning; Lint Cotton Handling; and Mote Handling, Mote Trash, and Trash

Spreader processes. The cyclone being tested shall be the one with the highest visible emissions in each group, for a grand total of four VE tests conducted. Such tests shall be scheduled once per year during the first month of each cotton ginning season. The Department shall be notified at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. Results shall be submitted to the Department within 45 days after testing.

Notification of compliance testing and test results may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rules 62-4.070(3), 62-297.310(4 & 7), and 62-204.800(8)(e)4, F.A.C.]

A.5.b. Test Reports. The test reports shall comply with applicable portions of Rule 62-297.310(8), F.A.C. The Department can require special compliance tests in accordance with Rule 62-297.310(7), F.A.C. Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing. [Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

A.5.c. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90-100% of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emission unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110% of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for purpose of additional compliance testing to regain the authority to operate at the permitted capacity, with prior notification to the Department. [Rules 62-297.310(2) and 62-4.070, F.A.C.]

Record Keeping and Reporting Requirements

A.6. Operational Data. Permittee shall maintain a record of finished product output (500 pound bales produced) and operational hours, certifying total product output and total hours of operation. This information shall be provided in the form of a monthly summary (output and operational hours) and kept on site for Department inspection for at least three years. [Rule 62-4.070(3), F.A.C.]

{Permitting Note: During the previous permitting action this facility was identified as a minor source facility. Due to the short annual operating duration of this facility (three to five months) and the only significant emissions being primarily biodegradable PM, the Department determined that the submission of an AOR is not required. The Air Resource Management System (ARMS) database was updated to reflect this change.}

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted for the purpose of:

a. Have access to and copy any records that must be kept under conditions of this permit;
b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. A description of and cause of noncompliance; and
b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages that may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the Department approves the transfer.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used;
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.