Florida Department of Environmental Protection

Memorandum

TO: Rick Bradburn
THROUGH: Armando I. Sarasua, P.E.
FROM: Angelia Jackson
DATE: July 10, 2012
SUBJECT: Evaluation Summary for Clover Leaf Gin, Inc., Marianna Gin 0630039-010-AO, Jackson County

This permit revision incorporates permit 0630039-009-AC, effective September 22, 2011, into the existing operating permit 0630039-008-AO, effective December 21, 2010. Permit 0630039-009-AC authorized the replacement of Tower Dryers #1 and #2 with LP gas-fired Jet Dryers of the same heat input. Permit 0630039-009-AC also authorized the replacement of cyclones 3 and 4 with new cyclones and using the-cyclones removed from cyclones 3 and 4 to replace Cyclones 5 and 6. Construction was completed October 6, 2011.

Process Description.
This is a cotton ginning facility consisting of raw cotton unloading, seed cotton cleaning, lint cotton handling, and trash/mote handling. The conditionally exempt LP gas-fired heaters are used to dry the seed cotton during unloading and conveying. Cleaned (lint) cotton is baled (approximately 500 lb/bale) as the final product. A steam generator is used to humidify the cotton as it is baled and an additional steam generator is used to humidify the gin stands.

Pollution Control Equipment.
Particulate emissions are controlled by 22 cyclones.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	N/A	N/A	72.0	N/A	<100
SO2	N/A	N/A	0.02	N/A	<100
VOC	N/A	N/A	0.08	N/A	<100
NOx	N/A	N/A	2.10	N/A	<100
CO	N/A	N/A	0.29	N/A	<100
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE	N/A	N/A	N/A	Not more than 20% opacity	

**Cumulative NOx emissions for the conditionally exempt dryers and steam generators.*

Applicable Rules & Regulations. This source is regulated in accordance with Rule 62-296.320(4)(b)1., F.A.C. – "General Visible Emission Standards.
It is not likely that this facility would ever exceed Title V thresholds due to the short cotton ginning season (3 to 5 months).

Compliance Monitoring. The facility is required to have visible emissions tests run on the worst case cyclone or stack from each of the raw cotton unloading; seed cotton cleaning; lint cotton handling; and

trash/mote handling. The visible emissions tests must be conducted annually and shall be scheduled once per year, during the first month of the ginning season. Records must be kept to comply with fuel usage limits on steam generators and humidifiers.

Compliance History.
Inspections for 2011, 2010, 2008 and 2006 – The facility noted, "In Compliance." No VE test performed for 2007. Warning Letter issued as well as a Consent Order and the facility was assessed a penalty. The case was closed out 3/2009.

Fee Summary. This is an AOMM ($250 fee) minor modification.

AMJ/c