



Florida Department of Environmental Protection

Memorandum

PJ
TO: Rick Bradburn
THROUGH: Armando Sarasua
FROM: R. J. Prusa *[Signature]*
DATE: December 17, 2007
SUBJECT: Evaluation Summary for Burkhead Gin Company, Jay Facility, 1130027-004-AO, Santa Rosa County

We recommend issuing a permit to Burkhead Gin Company to operate their Jay Facility. There are no changes in potential emissions.

Process Description

This is a cotton ginning facility consisting of seven processes: raw cotton unloading, seed cotton drying and cleaning, ginning, lint cleaning and baling, seed handling, trash and mote system, and trash handling. Particulate emissions from these systems are controlled by 25 cyclones (1 through 25). Four natural gas-fired heaters, each with a capacity of 3 MMBtu/hour, are used to dry the seed cotton during unloading and cleaning. Cleaned (lint) cotton is baled (500 lbs/bale) as the final product.

The facility's four air heaters are exempt from permitting by F.A.C. Rule 62-210.300(3)(b)1. – Generic Emission Unit Exemption.” This exemption is based on the facility operating 3,000 hours per year, having a total capacity of 12 MMBtu per hour, and firing natural gas with an assumed heating value of 1,050 Btu per cubic foot.

Pollution Control Equipment

25 cyclones are used to control particulate, primarily greater than PM10, emissions (1 through 25).

Environmental Impact

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	N/A	N/A	76.24	N/A	N/A
SO ₂	N/A	N/A	0.01	N/A	N/A
VOC	N/A	N/A	0.09	N/A	N/A
NO _x	N/A	N/A	1.71	N/A	N/A
CO	N/A	N/A	1.44	N/A	N/A
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	

Applicable Rules & Regulations

This source is regulated in accordance with F.A.C. Rules 62-296.320(4)(b)1 – “General Visible Emission Standards.”

Compliance Monitoring

A visible emissions test is 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 test shall be conducted in accordance with DEP Method 9 on the one cyclone from the Raw Cotton Unloading; Ginning; Lint Cleaning and Baling/Trash and Mote System, and Trash Handling processes deemed to have the highest visible emissions. The test shall be scheduled once per year, during the first month of the ginning season.

Compliance History

A review of inspection reports and VE tests for the past five years indicates that the facility is in-compliance.

Fee Summary

This is an AO2B (\$1,000 fee) minor source with no stack test.

RB/rp/c