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Burkhead Gin Company
Jay Facility
Facility ID No.: 1130027
Santa Rosa County

Air Operation Permit
Permit No.: 1130027-005-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
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Air Operation Permit
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FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Northwest District
160 W. Government St., Suite 308
Pensacola, Florida 32502-5740

RICK SCOTT
GOVERNOR

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LT. GOVERNOR

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SECRETARY

Permittee:
Burkhead Gin Company
Jay Facility

Permit No.: 1130027-005-AO
Facility ID No.: 1130027
SIC No(s).: 07, 0724
Project: Air Operation Permit

This permit is for the operation of the Burkhead Gin Company, Jay Facility located at 14294 Highway 89 N in Jay, Santa Rosa County; UTM Coordinates: Zone 16, 485.3 km East and 3425.8 km North; Latitude: 30° 57' 22" North and Longitude: 87° 08' 43" 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: October 15, 2012
Renewal Application Due Date: August 16, 2017
Expiration Date: October 15, 2017

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Rick Bradburn

Rick Bradburn
Air Program Administrator

RB/ha/c

Section I. Facility Information.

This is a renewal of Permit 1130027-004-AO, effective December 18, 2007.

Subsection A. Facility Description.

This facility consists of the following processes: raw cotton unloading, seed cotton drying and cleaning, ginning, lint cleaning and baling, seed handling, trash and mote system, and trash handling. Seed cotton is pneumatically conveyed through dryers, gins and cleaners to remove seeds and trash. Cleaned (lint) cotton is baled as the final product. Particulate emissions from these systems are controlled by cyclones. Natural gas-fired heaters are used to dry the seed cotton during the unloading and conveying operations.

Raw Cotton Unloading: The unloading process is primarily modular. Cotton modules are unloaded from trucks and conveyed to the unloading separator. From the separator, seed cotton falls into the feed controller which controls the speed of the unloading process and prevents backup and overflow. The suction required to move the cotton through this process is provided by a pull fan, which exhausts to Cyclones #1 and #2. The facility can also unload loose cotton from trailers using a suction pipe (old process before modules). However, this method is seldom used.

Drying and Cleaning: Drying and cleaning are done in three streams. Each stream is conveyed by air pulled by a fan and heated by two natural gas heaters, #1 and #2. Each stream consists of a first step tower dryer, incline cleaner, stick and burr machine, second step tower dryer, and incline cleaner. Between the first and second cleaning steps, additional conveying air is provided by two push fans and heated by two natural gas air heaters, #3 and #4. Trash, burrs and sticks, removed by the incline cleaners and stick and burr machines, are pneumatically conveyed by exhaust systems (fans) to the facility's main trash plenum. Dried and cleaned seed cotton from all three streams fall into a distribution screw conveyor to be carried to the gin stands.

Ginning: Cotton ginning is accomplished by four gin stands into which seed cotton is fed by a distribution screw conveyor. Gin stands separate seeds, motes and trash from seed cotton. From this point on, cotton is referred to as lint cotton. Lint cotton is delivered by a pneumatic exhaust system (fan) to the next process called lint cleaning. The trash and motes removed during the ginning process are picked up by an exhaust system terminating in Cyclone #3. The seeds removed during the ginning process fall into an enclosed screw conveyor, which delivers them to the seed handling system.

Lint Cleaning and Baling: Lint cotton is pneumatically conveyed from the gin stands in four streams (one from each gin stand). Each stream is equipped with a super jet and two lint cleaners. After cleaning, lint cotton is delivered into the battery condenser by a suction conveying system (pull fan). Lint cotton is separated from the exhaust air system in the battery condenser and falls through a chute into a bale press, where it is pressed into bales as finished product. The finished bales weigh approximately 500 pounds each. An exhaust blower, providing suction for the process, exhausts into a facility dust house. The motes and trash removed from lint cotton by the super jet and cleaners are removed by exhaust blowers terminating in Cyclones #4, #5, #6 and #7. Fine fibers, called nits, are exhausted from the lint cleaners by a separate exhaust stream terminating into Cyclones #9, #10, #11 and #12.

Seed handling: Seed handling consists of a seed screw conveyor that picks up the seeds removed at the four gin stands, and several additional screw conveyors that deliver seeds to a seed house. From there, seeds are pneumatically blown into truck trailers for removal.

Trash and Mote System: The motes and trash removed by the gin stands are delivered to cyclone #3. Motes and trash removed from the lint cleaning process are delivered to cyclones #4, #5, #6, #7, #9, #10, #11 and #12. All of these cyclones discharge into a trash and mote screw conveyor. From this conveyor, trash and motes are carried by suction system (pull fan) and delivered into cyclone #8. Cyclone #8 empties into an inclined screen where trash is separated from the motes. Motes fall from the screen into a motes baler similar to the lint cotton baler. The trash is pneumatically conveyed into the facility's main trash plenum.

Trash Handling: All of the trash produced by the various activities ends up in the facility's trash plenum. From the plenum, trash is removed by a system of vacuum wheels and emptied into a pneumatic system terminating at cyclone #25. Trash is also removed from this plenum by air streams terminating at cyclones #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23 and #24. Cyclones #13, #15, #17, #19, #21, #23 and #25 discharge trash into an enclosed screw conveyor, which delivers trash into a trailer underneath. Cyclones #14, #16, #18, #20, #22 and #24 also discharge into another screw conveyor which delivers trash into a trailer parked underneath.

The facility operates three natural gas fired air heaters for drying cotton during the unloading and cleaning processes.

Unit Designation	Size	Description
Heater #1	3 MM Btu/hr heat input	Natural gas-fired air heater, unloading
Heater #2	3 MM Btu/hr heat input	Natural gas-fired air heater, unloading
Heater #3	3 MM Btu/hr heat input	Natural gas-fired air heater, cleaning
Heater #4	3 MM Btu/hr heat input	Natural gas-fired air heater, cleaning
Total Heat Input:	12 MM Btu/hr	

These conveying/drying operation air heaters are exempt from permitting by Rule 62-210.300(3)(b)1., F.A.C. – Generic Emission Unit Exemption, because potential emissions of any regulated air pollutant is less than 5.0 tons per year. This exemption is based on 60,000 bales of finished product per year, a total heat input of 12 MMBtu per hour, an assumed natural gas heating value of 1,050 Btu per cubic foot, and emission factors from AP-42 Tables 1.4-1 and 2.

The facility is a synthetic 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 Particular Matter to less than 100 tons per year and keep this facility from becoming a major source (Title V).

Based on the permit application received October 11, 2012, 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).

Facility ID No. 1130026	
EU ID No.	**Emissions Unit Description**
005	Cotton Gin Operations

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 document listed below is not a part of this permit; however, it is specifically related to this permitting action.

This document is on file with permitting authority:
Application for Non-Title V Air Operation Permit Renewal received October 11, 2012.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. Appendix G-1, General Conditions, is a 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 pursuant to Chapter 62-297, 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; Rule 62-204.800, F.A.C.; and, Chapter 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. 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 include:

a) Paving and maintenance of roads, parking areas and yards.
b) Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
c) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
d) Landscaping or planting of vegetation.

e) Enclosure or covering of conveyor systems.
[Rule 62-296.320(4)(c), F.A.C.; and permit 1130027-002-AC]

8. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit four permit renewal applications 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/emission/permitting.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 Office
160 W Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850.595.8300; Fax: 850.595.8096

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 850.595.0578, 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 emissions unit.

Facility ID No. 1130027	
EU ID No.	**Emissions Unit Description**
005	Cotton Gin Operations

The cotton ginning facility consists of the following processes: raw cotton unloading, seed cotton drying and cleaning, ginning, lint cleaning and baling, seed handling, trash and mote system, and trash handling. Seed cotton is pneumatically conveyed through dryers, gins and cleaners to remove seeds and trash. Cleaned (lint) cotton is baled as the final product. Natural gas-fired heaters are used to dry the seed cotton during unloading and conveying processes.

Particulate emissions from the cotton gin operations are controlled by cyclones. Ginning operations and associated cyclones are listed in the following tables.

Raw Cotton Unloading		
Cyclone	**Diameter (inches)**	**Process**
1	48	Unloading System Suction
2	48	Unloading System Suction

Ginning		
Cyclone	**Diameter (inches)**	**Process**
3	32	Trash and Mote Removal from Seed Cotton

Lint Cleaning and Baling / Trash and Mote System		
Cyclone	**Diameter (inches)**	**Process**
4, 5, 6, 7	36	Trash and Mote Removal from Lint Cleaners
8	60	Trash and Mote separation
9, 10, 11, 12	60	Nit Removal from Lint Cleaners

Trash Handling		
Cyclone	**Diameter (inches)**	**Process**
13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24	48	Trash Removal from Trash Plenum
25	24	Trash Removal from Trash Plenum

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

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. For compliance testing purposes only, the maximum allowable operating rate of the cotton gin is 32 bales of lint cotton (500 lbs per bale of finished product) per hour. [Rules 62-210.200(PTE) and 62-4.160(2), F.A.C., and permit no. 1130027-002-AC]

{Permitting Note: The design operating capacity of the cotton gin is 40 bales of lint cotton (500 lbs per bale of finished product) per hour as indicated in the permit application No. 1130027-005-AO received October 11, 2012. However, the cotton gin has not been tested at design capacity and the maximum allowable operating rate had been decreased by permit no. 1130027-002-AC pursuant to Rule 62-297.310(2). See Specific Condition - Testing at Permitted Capacity.}

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.(2), and 62-210.200(PTE), F.A.C., and permit 1130027-002-AC]

A.3. Hours of Operation. The maximum hours of operation are 3,000 hours per 12-consecutive-month period (year). [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and permit 1130027-002-AC]

Emission Limitations and Standards

A.4. Visible Emissions. Visible emissions shall be less than 20 percent opacity. [Rule 62-4.030, F.A.C., and permit 1130027-002-AC]

{Permitting Note: Permit 1130027-002-AC established a 20% Visible Emission requirement on the cyclones for reasonable assurance of proper operation and maintenance.}

Test Methods and Procedures

A.5.a. Required Testing. 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, Ginning, Lint Cleaning and Baling/Trash and Mote System and Trash Handling. 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, 62-297.310(7), and 62-297.401(9), F.A.C.]

A.5.b. Test Reports. The test reports shall comply with applicable portions of Rule 62-297.310, Test Reports, 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. Testing at Permitted Capacity. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department. [Rules 62-297.310(2) and 62-4.070, F.A.C.]

Recordkeeping and Reporting Requirements

A.6. Permittee shall maintain finished product output (500 pound bales produced) and operational hour's records 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. [Rules 62-4.160, F.A.C.]

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.