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Clover Leaf Gin, Inc.
Marianna Facility
Facility ID No.: 0630039
Jackson County

Air Construction Permit
Permit No.: 0630039-004-AC

Permitting and Compliance Authority:
Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, FL 32501-5794
Telephone: 850/595-8364
Fax: 850/595-8096

[electronic file name: 0630039-004-ac]

Air Construction Permit
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Jeb Bush
Governor

Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

David B. Struhs
Secretary

Permittee:
Clover Leaf Gin, Inc.

Permit No.: 0630039-004-AC
Facility ID No.: 0630039
SIC Nos.: 07, 0724
Project: Cotton Ginning Facility

This construction permit is for modifications to the Marianna facility located at 4455 Highway 162, Jackson County; UTM Coordinates: Zone 16, 670.30 km East and 3416.30 km North; Latitude: 30° 52' 11" North and Longitude: 85° 13' 06" West.

STATEMENT OF BASIS: This air construction permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 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.

Referenced attachments made a part of this permit:
Appendix G-1, General Conditions

Effective Date: October 25, 2000
Expiration Date: October 25, 2001

**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

Andrew S. Allen
Air Permitting Supervisor

ASA/rbc

"More Protection, Less Process"

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Section I. Facility Information.

Subsection A. Facility Description.

This is a cotton ginning facility consisting of raw cotton unloading, seed cotton cleaning, lint cotton handling, and trash/mote handling. Particulate emissions from these systems are controlled by cyclones. Three LP gas-fired heaters are used to dry the seed cotton during unloading and conveying. Cleaned (lint) cotton is baled as the final product. A 2 MMBtu steam generator is used to humidify the cotton as it is baled.

This construction permit is for the modification to the existing facility. The modifications include the replacement of two, LP gas-fired, 3MMBtu per hour heaters and the upgrade of three cyclones to a larger capacity. The two new heaters will be rated at 4 and 8 MMBtu per hour. Cyclones Nos. 3, 4 and 7 will be upgraded to handle a greater flow and cyclone 16 will be removed from the system.

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

E.U.

<u>ID No.</u>	<u>Brief Description</u>
001	Raw Cotton Unloading
002	Seed Cotton Cleaning
003	Lint Cotton Handling
004	Trash From Lint Cotton, Mote and Seed Handling
005	Conveying/Drying Operation Air Heaters and Steam Generator

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.

This document is provided to the permittee for information purposes only:
Table 1-1, Summary of Air Pollutant Standards and Terms.

This document is on file with permitting authority:
Construction Permit Application received September 25, 2000.

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. 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)(a), F.A.C.]
5. 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. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
 - e. Landscaping or planting of vegetation.
 - f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
 - g. Confining abrasive blasting where possible.
 - h. Enclosure or covering of conveyor systems.
[Rule 62-296.320(4)(c)2., F.A.C.]

6. The applicant shall retain a Professional Engineer, registered in the State of Florida, for the inspection of this project. Upon completion, the engineer shall inspect for conformity to the permit application and associated documents. The engineer shall submit a certification of completion of construction within 30 days of initial operation.

[Rules 62-210.300(2) and 62-4.050(3), F.A.C.]

7. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

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

Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32501-5794

A copy of all compliance related notifications shall be sent to the Northwest District Branch Office in Panama City at 2353 Jenks Ave, Panama City FL 32405.

9. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (850) 595-8364, extension 1220, 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) 595-8364, then press 7, during normal working hours.

[Rules 62-210.700 and 62-4.130, F.A.C.]

10. The Department shall be notified upon commencement of construction. The Department shall be notified and prior approval shall be obtained of any changes or revisions made during construction. Projects beyond one year require annual status reports.

[Rule 62-4.030, F.A.C.]

Section III. Emissions Units and Conditions.

Subsection A. This section addresses the following emissions units.

Emission Unit 001, Raw Cotton Unloading

<u>Cyclone</u>	<u>Diameter</u>	<u>Process</u>
1	58"	Unloading Suction Fan
2	58"	Unloading Suction Fan

Emission Unit 002, Seed Cotton Cleaning

<u>Cyclone</u>	<u>Diameter</u>	<u>Process</u>
3, 4 (new)	52"	#1 Inclined Screen Cleaner fan
5, 6	46"	#2 Inclined Screen Cleaner fan

Emission Unit 003, Lint Cotton Handling

<u>Cyclone</u>	<u>Diameter</u>	<u>Process</u>
7 (new)	54"	Seed Cotton Module Trash Blower
8, 9	58"	Lint Cleaning System -Motes fan
10, 11	68"	Lint Cleaning System - #3A, #3B Lint Cleaners, Nits Fan #3
12, 13	68"	Lint Cleaning System - #2A, #2B Lint Cleaners, Nits Fan #2
14, 15	68"	Lint Cleaning System - #1A, #1B Lint Cleaners, Nits Fan #1
17, 18, 23	72"	Lint Baling System - Battery Condenser

Emission Unit 004, Trash From Lint Cotton, Mote and Seed Handling

<u>Cyclone</u>	<u>Diameter</u>	<u>Process</u>
16	N/A	Taken out of service
19	52"	Mote Baling - Motes Inclined Screen Cleaner Pull Fan
20	54"	Nits Trash Fan
21	52"	Trash Handling - Trash Piles
22	56"	Trash Handling - Trash Piles

Emission Unit 005, Conveying/Drying Operation Air Heaters and Steam Generator

<u>Size</u>	<u>Description</u>
8 MM Btu/hr heat input (new)	LP gas-fired air heater, # 1 drying column
4 MM Btu/hr heat input (new)	LP gas-fired air heater, # 2 drying column
3 MM Btu/hr heat input	LP gas-fired air heater, module heater
2 MM Btu/hr heat input	LP gas-fired steam generator, baling humidifier

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

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The maximum operating rate shall not exceed 16,500 pounds of lint cotton per hour, equivalent to 33 bales of lint cotton (finished product) per hour. This is the operating rate at which compliance with standards shall be demonstrated.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.2. Methods of Operation. The maximum annual throughput shall not exceed 44,000 bales of lint cotton (finished product) per year. The Permittee shall maintain throughput records certifying total throughput, which shall be made available for Department inspection.
[Rules 62-4.160(2) and 62-213.440(1), F.A.C.]

A.3. Hours of Operation. The maximum hours of operation are 4,380 hours per year. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation annually.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

A.4. Visible emissions. Visible emissions shall be less than 20% opacity.
[Rule 62-296.320(4)(b)1., F.A.C.]

Test Methods and Procedures

A.5. Emissions tests shall be conducted as outlined by the facility's operating permit 0630039-002-AO. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.
[Rules 62-4.070 and 62-297.310(7), F.A.C.]

A.6. 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 standard 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 which 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.
[Rule 62-297.310(7)(b), F.A.C.]

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GENERAL CONDITIONS:

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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. Nor 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 does not constitute 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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of this permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,
 - c. Sampling or monitoring 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

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Appendix G-1

GENERAL CONDITIONS:

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recurrence of the noncompliance. The permittee shall be responsible for any and all damages which 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 transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

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 measurement;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- 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.