Florida Department of
Environmental Protection
Northwest District
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

August 12, 2011

By Electronic Mail, Received Receipt Requested
scott@cloverleafgin.com

Mr. Scott Mitchell
Executive Vice President
Clover Leaf Gin, Inc.
Post Office Box 366
Donalsonville, Georgia 39845

Dear Mr. Mitchell:

This is to acknowledge receipt of your application for an air operation permit, DEP file number 0630039-009, to modify the cotton gin operations, Emissions Unit 006, at the Clover Leaf Gin in Marianna, Jackson County. This letter constitutes notice that a permit will be required for your project pursuant to Chapter 403, Florida Statutes.

Your application for permit is incomplete. Please provide the information listed below. References made below to "Application" refer to DEP Form No. 62-210.900(3), Effective 2/11/1999 and its instructions.

1) On page 2 of the application, please check the box for an air construction permit to construct or modify one or more emissions units, instead of a Non-Title V operation permit revision. Resubmit corrected page.
2) On page 5, please change the permit type to AC1F (the $250 fee will remain the same and has already been received). Resubmit corrected page.
3) On page 9, there should not be an emissions cap for PM or PM10, because this is not a limit in the permit. The emissions unit is limited by hours of operation and has a maximum throughput. Resubmit corrected page.
4) On page 10, a new facility plot plan and process flow diagram needs to be submitted if the location of the new equipment will be in a different place than the equipment that is being replaced.
5) The emissions factor that is used for PM and PM10 is the cotton gin total No. 1 (from Table 9.7-1 of AP-42). However, the footnote (v) mentions that the factor does not include a third dryer and cleaner, cyclone robber system, mote trash fan, lint cleaners with screened drums or cages , and battery condenser with

screened drums or cages. On the process flow diagrams that were submitted in the past, there is a battery condenser. This emission factor and resulting emissions should be added to the total emissions factor. Also, does the facility have the other items listed above? If so, those should be included in revised emissions calculations.

6) Please submit information about the new dryers and 54" cyclones that are to be installed; for example, manufacturer name, model, efficiency, etc.

Professional Engineer (P.E.) Certification Statement**:** Rule 62-4.050(3), Florida Administrative Code (F.A.C.), requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, at a minimum your response to the above should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the Non-Title V application form, DEP Form No. 62-210.900(3) (enclosed).

When referring to this project, please use the file number indicated above. The application states that the facility would like to begin construction by Sept. 1, 2011. However, construction should not begin until the final permit has been issued (after the intent has been issued and the facility has published the public notice - 14 days). If you have any questions, please contact Debbie Moore at 850/595-0624 or e-mail deborah.l.moore@dep.state.fl.us.

Sincerely,

/s/

Armando I. Sarasua, P.E.
Air Permitting Supervisor

AIS/dm/c

Enclosure
c: William Arlington, Environmental Consultant: barlington@arlingtonenvironmental.com
Eugene Schaltenbrand, P.E.: via facsimile 954/796-3058
DEP Northwest District Branch Office, Panama City

Professional Engineer Certification

1.	Professional Engineer Name: Registration Number:
2.	Professional Engineer Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:
3.	Professional Engineer Telephone Numbers: Telephone: ( ) - Fax: ( ) -

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [ ], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

_____ _____

Signature Date

(seal)

* Attach any exception to certification statement.