Golden Gin and Warehouse, Inc.
Jay Facility
Facility ID No.: 1130026
Santa Rosa County

Air Operation Permit
Permit No.: 1130026-008-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, FL 32502-5740
Telephone: 850/595-8300
Fax: 850/595-8096

[Electronic file name: 1130026-008-AO.doc]

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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

Permittee:
Golden Gin and Warehouse, Inc.
Jay Facility

Permit No.: 1130026-008-AO
Facility ID No.: 1130026
SIC No(s).: 07, 0724
Project: Air Operation Permit

This permit is for the operation of the Golden Gin and Warehouse, Inc., Jay Facility located at 400 Commerce Street, Jay, Santa Rosa County; UTM Coordinates: Zone 16, 485.6 km East and 3424.8 km North; Latitude: 30° 57' 52" North and Longitude: 87° 09' 05" 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: September 5, 2012
Renewal Application Due Date: July 7, 2017
Expiration Date: September 5, 2017

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

/s/

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Rick Bradburn
Air Program Administrator

RB/ha/c

Section I. Facility Information.

This is a renewal of Permit 1130026-007-AO, effective November 6, 2007.

Subsection A. Facility Description.

This facility consists of a raw cotton unloading system, a seed cotton cleaning system, a lint cotton handling system and a trash/mote system. 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.

Seed cotton is pneumatically conveyed from the transport vehicles at a maximum rate of 63,000 pounds of seed cotton per hour. It may be conveyed through a separator to seed cotton cleaning, or it may be conveyed directly from cotton modules. Heated air, produced by the facility's three natural gas fired heaters, is used to dry and convey seed cotton. The separator conveying air flows through a cyclone system (cyclones 18 and 19) to collect the particulate matter (trash). Seed cotton is then processed through inclined screen cleaners and through stick and burr machines. Particulate emissions associated with the seed cotton cleaning process are controlled by cyclones 1, 2, 3, 4, 6 and 11.

Cleaned dried cotton is then fed to a distributor system, feeding gin stands 1, 2 and 3, which separates the seed, trash and fibers from the lint cotton. Excess cotton falls into an overflow hopper and is returned to the distributor system. Particulate emissions from the distributor system and gin stands are controlled by cyclones 5 and 12. Lint cotton fibers from the gin stands are pneumatically conveyed to four parallel lint cleaners where trash is combed from the fibers. Particulate emissions from the lint cleaners are controlled by cyclones 7, 8, 9, 10, 13 and 14. The lint cotton fibers are conveyed to the condenser, which collects the fibers to be baled as cleaned (lint) cotton. Particulate emissions from the condenser are controlled by cyclones 15, 16 and 17. Lint fly (emissions) from the cotton baling press are captured by cyclone 23. Trash from the lint cleaners is pneumatically conveyed to cyclones at the mote house and combined (after seeding) with trash from gin stands 1, 2 and 3. Mote house/gin stand emissions are controlled by cyclones 21, 22, 24 and 25, and the combined trash emissions are controlled by cyclone 20. Seeds are conveyed to the seed house where they are stored in bins prior to shipment. Trash from the cyclones is routed to enclosed screw conveyors that empty into a dumpster for disposal.

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

Unit Designation	Size	Description
Dryer Heater #1	6 MM Btu/hr heat input	Natural gas-fired air heater, unloading
Dryer Heater #2	3 MM Btu/hr heat input	Natural gas-fired air heater, cleaning
Dryer Heater #3	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 limited use of the dryers (2,000 operating hours 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 & 2.

The facility is a synthetic minor source. The maximum operating rate is 45 bales of finished product per hour, the annual throughput limit is 75,000 bales of finished product per year, and total operating hours are limited to 2,000 hours per year. These permit limits were established to limit emissions of PM to less than 100 tons per year and keep this facility from becoming a major source (Title V).

Based on the permit application, received August 21, 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**
006	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 documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are on file with permitting authority:
Application for Non-Title V Air Operation Permit Renewal received August 21, 2012.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. All listed Appendices are 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) 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) Maintain process equipment and remove debris and trash from the facility on a regular basis.

[Rule 62-296.320(4)(c), F.A.C., and permit 1130026-004-AC]

8. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit a permit renewal application 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. Alternatively, a text searchable of the application form can be submitted electronically to nwdair@dep.state.fl.us. [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. 1130026	
EU ID No.	**Emissions Unit Description**
006	Cotton Gin Operations

This emission unit consists of a raw cotton unloading system, a seed cotton cleaning system, a lint cotton handling system and a trash/mote system. 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.

Particulate emissions from the cotton gin operations are controlled by high efficiency type cyclones developed by Texas A & M University. Ginning operations and associated cyclones are listed in the following tables.

Raw Cotton Unloading		
Cyclone	**Diameter (inches)**	**Process**
18	46	Unloading System Suction
19	46	Unloading System Suction

Seed Cotton Cleaning		
Cyclone	**Diameter (inches)**	**Process**
1, 2	46	1A Cleaner, 1st Stage Seed Cotton Cleaning and Drying
3, 4	46	1B Cleaner, 1st Stage Seed Cotton Cleaning and Drying
6	62	2A Cleaner, 2nd Stage Seed Cotton Cleaning and Drying
11	62	2B Cleaner, 1st Stage Seed Cotton Cleaning and Drying

Lint Cotton Handling		
Cyclone	**Diameter (inches)**	**Process**
5	40	Gin System – Gin Stand Trash
12	40	Gin System – Gin Stand Overflow
13, 14	60	Lint Cleaning System - #1 Gin Lint Cleaner
9, 10	60	Lint Cleaning System - #2 Gin Lint Cleaner
7, 8	60	Lint Cleaning System - #3 Gin Lint Cleaner
15, 16, 17	58	Lint Baling System - Battery Condenser

Trash From Lint Cotton handling, Seed House, Mote House		
Cyclone	**Diameter (inches)**	**Process**
20	36	Mote System – Mote Trash
21, 22	38	Mote System – Mote Cleaner (Gin Stand 3)

24, 25	44	Mote System – Mote Cleaner (Gin Stand 1 and 2)
23	44	Cotton Baling Press – Lint Fly Cleaner

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

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The maximum operating rate shall not exceed 45 bales of lint cotton (500 lbs per bale of 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., and permit 1130026-004-AC.]

A.2. Methods of Operation. The maximum annual throughput shall not exceed 75,000 bales of lint cotton (finished product) per 12-consecutive-month period (year). [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and permit 1130026-004-AC]

A.3. Hours of Operation. The hours of operation for this emissions unit shall not exceed 2,000 hours per 12-consecutive-month period (year). [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and permit 1130026-004-AC]

Emission Limitations and Standards

A.4. Visible Emissions. Visible emissions shall be less than 20 percent opacity. [Rule 62-4.030 and permit 1130026-001-AC]

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 thirty (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; Seed Cotton Cleaning; Lint Cotton Handling; and Trash from Lint Cotton, Mote House and Seed House handling processes. 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. Notification of compliance testing may be submitted by electronic mail to nwdair@dep.state.fl.us. Results shall be submitted to the Department within 45 days after testing. [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 F.A.C. Rule 62-297.310, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.310(7). 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. 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. The Permittee shall maintain a daily record of finished product output (number of 500 pound bales produced) and operational hours, certifying total product output and total hours of operation. This information shall be provided in the form of a monthly summary (product output and operational hours) and kept on site for Department inspection for at least three years. [Rule 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.