Florida Department of

Memorandum

Environmental Protection

TO: Sandra F. Veazey

FROM: Angelia Jackson

THROUGH: Kevin White

DATE: January 14, 2003

SUBJECT: Evaluation Summary for Burkhead Gin Company, Jay Facility, 1130027-003-AO, Santa Rosa County

We recommend issuing a permit to Burkhead Gin Company to operate their Jay Facility.

Process Description This is a cotton ginning facility consisting of seven processes: raw cotton unloading, seed cotton drying and cleaning, ginning, lint cleaning and bailing, 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, all 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 heat content of 1,050 Btu per cubic feet.

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 lbs/hr	Estimated Emissions T/yr	Allowable Emissions lb/hr	Allowable Emissions T/yr
PM	N/A	N/A	76.24	N/A	N/A
SO2	N/A	N/A	0.01	N/A	N/A
VOC	N/A	N/A	0.09	N/A	N/A
NOx	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" and 62-210.200(178) – "Major Source of Air Pollution" or "Title V Source."

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 On October 25, 2000, the Department conducted an annual inspection in which no significant compliance issues were reported. However, the inspector did suggest that the facility begin logging operational hours. It was explained that the records are necessary for the Department to determine the facility's throughput and verify compliance. On October 18, 2001, the Department conducted an annual inspection. During this visit it was determined that the gin had most likely exceeded the permitted maximum production limit. However, due to the age of the permit and the changes that have occurred in the way Gins are monitored for compliance and at the facility, it was not completely clear. The inspection report recommended that the facility immediately submit an air construction permit application to increase their permitted production limits and their hours of operation if necessary. Once again the facility was recommended to keep operational hour records. On November 05, 2002, the Department conducted an annual inspection in which no significant compliance issues were reported. Once again, the inspector suggested that the facility begin logging operational hours.

Fee Summary This is an AO2B ($1,000 fee) minor source with no stack test. The original construction permit fee was $2,000 for a non-Title V facility (source less than 50 TPY). The last issued permit was an AC1D ($2,000 fee) with an increase of emissions of 25 tons/year but less than 50 tons/year. The previous application processed was an AO2B ($1,000 fee) minor source with VE testing.

SFV:ajc