



Department of Environmental Protection

FILE COPY

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

ENV PRO
JUL 16 1996

PERMITTEE:

Clover Leaf Gin, Inc.

AIRS I.D. Number: 0630039
Air Permit Number: 0630039001AC
Emission Units: 001, 002, 003, 004 & 005
Date of Issue: July 16, 1996
Expiration Date: December 31, 1997
County: Jackson
Project: Cotton Ginning Facility

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 62-296, 62-297 and 62-4. The above named applicant, hereinafter called 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 Department and made a part hereof and specifically described as follows:

Construction at an existing Cotton Ginning Facility involving process flow changes and installation of new cyclones: In the process seed cotton is pneumatically conveyed through dryers, gins and cleaners to remove seeds and trash. Cleaned (lint) cotton is baled as the final product.

The process consists of raw cotton unloading, seed cotton cleaning, lint cotton handling, and trash/mote handling. Particulate emissions from these systems are controlled by cyclones. LP gas-fired heaters are used to dry the seed cotton during unloading and conveying.

Seed cotton is pneumatically conveyed from transport vehicles or seed cotton modules are fed into a module feeder at a maximum rate of 49,500 pounds of seed cotton per hour. The seed cotton from the module feeder is run through a hot box for drying and then all seed cotton is conveyed to a stone trap and unloading separator. The unloading separator conveying air flows to a cyclone system to collect trash with particulate emissions controlled by cyclones C1 and C2.

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Seed cotton is then processed through tower dryers and thence to inclined screen cleaners and stick and burr machines. Heated air is used to dry and convey the seed cotton to the inclined screen cleaners and through the stick and burr machines. Particulate emissions associated with the seed cotton cleaning process are controlled by cyclones C3, C4, C5 and C6.

The dried cotton is then fed to a distributor system feeding gin stands 1,2, & 3. The gins separate 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 overflow separator are controlled by cyclone C7.

Lint cotton fibers from the gin stands are pneumatically conveyed to three parallel Super Jets and twin lint cleaners where trash is combed from the fibers. Nits and particulate emissions from the lint cleaners are controlled by cyclones C10, C11, C12, and C15. Motes from the lint cleaners are conveyed to cyclones C8 and C9. The motes are passed through an inclined screen cleaner and then baled by a motes bales press. Emissions from the cleaner are controlled by cyclone C19.

Trash from the Super Jets and lint cleaners is combined with trash from the gin stands and conveyed to a trash pit by a screw conveyor. Emissions from the trash pit are pulled by a hull fan and controlled by trash cyclone C16. Seeds are conveyed from the gins to the seed house where they are run through a cyclone which exhausts within the seed house. The seed house has two screened exhaust vents.

The lint cotton fibers are the conveyed to the battery condenser which collects the fibers to be baled as cleaned (lint) cotton. Particulate emissions from the condenser are controlled by cyclones C17 and C18. A 2 MMBtu steam generator is used to humidify the cotton as it is baled.

The trash cyclones have their trash routed to enclosed screw conveyors which empty onto piles outside for disposal. Particulate emissions are controlled by cyclones C21 and C22. The piles are kept wet by water sprays to control fugitive emissions.

Construction and process operation shall be consistent with the permit application signed May 6, 1996, and additional information submitted by letter dated June 5, 1996.

Located: 4455 Highway 162, 1/2 mile west of State Road 167, 3.5 miles west of Greenwood, Marianna

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SPECIFIC CONDITIONS:

General

1. The attached General Conditions are part of this permit. [FAC Rule 62-4.160]

Construction

2. The Department shall be notified upon commencement of construction, and within 15 days of completion of construction. Annual status reports shall be provided no later than January 31 of each year reviewing the status of construction during the preceding year up to completion of the project. [FAC Rule 62-4.070]
3. The Department shall be notified and prior approval shall be obtained of any changes or revisions made during construction. [FAC Rule 62-4.030]
4. Satisfactory ladders, platforms and other safety devices as well as necessary parts shall be provided/made available to facilitate an adequate inspection program. [FAC Rule 62-297.310(6)]

Operation

5. The maximum allowable operating rate is 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. [FAC Rule 62-4.070, construction permit application]
6. 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. [FAC Rule 62-4.070, construction permit application]
7. 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. [FAC Rule 62-4.070, construction permit application]

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SPECIFIC CONDITIONS:

Emissions

8. The maximum allowable visible emissions from each emission unit shall not be equal to, or exceed, 20% opacity. [FAC Rule 62-297.320(4)(b)]

9. All fugitive dust generated at this site shall be adequately controlled by existing good housekeeping practices such as protecting the seed and trash conveyors, chutes and bins from the action of the wind, keeping trash piles wet, periodic sweeping and/or vacuuming of work areas, and closing doors on windy days as needed. [FAC Rule 62-296.320(4)(c)]

10. No objectionable odors shall be allowed off plant property. If the Department determines the facility is emitting objectionable odors, the Permittee shall submit an odor remediation plan within 45 days of receipt of written notification from the Department. The plan shall include, but not be limited to, dispersion modeling analysis, strategies to reduce odorous chemicals utilization, and modifications of manufacturing production cycles, manufacturing methods and/or plant exhaust systems. [FAC Rule 62-296.320(2)]

Testing

11. 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. [FAC Rule 62-297.310(2)] The test shall be conducted in accordance with DEP Method 9 for 30 minutes on the one cyclone from emission units 001, 002, 003 and 004 deemed to have the highest visible emissions. The test shall be scheduled within 30 days after construction is completed. 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.

Test reports shall comply with F.A.C. Rule 62-297.310(8), Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.310(7)(b). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.

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, then 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, then 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. [FAC Rule 62-297.310(2)]

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SPECIFIC CONDITIONS:

Administrative

12. 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. An application for an operation permit [Form DEP 62-210.900(1), Long Form or 62-210.900(2), Short Form, as applicable] shall be submitted with the compliance test results and appropriate fee when applicable. These are to be submitted within 75 days of completion of construction. The permittee shall obtain an amended operating permit for this source before the expiration of this construction permit if the permittee desires to continue operation. [FAC Rules 62-4.030, 62-210.300]

13. The emission units covered by this permit are:

001 Raw Cotton Unloading

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

002 Seed Cotton Cleaning

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

003 Lint Cotton Handling

<u>Cyclone</u>	<u>Diameter</u>	<u>Process</u>
7	52"	Ginning System Overflow Separator Exhaust Fan
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	72"	Lint Baling System - Battery Condenser

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

<u>Cyclone</u>	<u>Diameter</u>	<u>Process</u>
16	50"	Trash Pit - Hull Fan
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
23		Seed House cyclone/vents

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005 Conveying/Drying Operation Air Heaters and Steam Generator

<u>Size</u>	<u>Description</u>
3 MM Btu/hr heat input	LP gas-fired air heater, unloading
3 MM Btu/hr heat input	LP gas-fired air heater, cleaning
3 MM Btu/hr heat input	LP gas-fired air heater, cleaning
2 MM Btu/hr heat input	LP gas-fired steam generator, baling humidifier

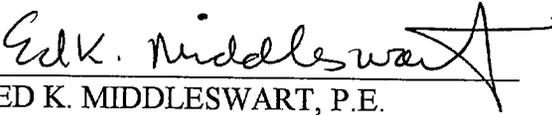
Please cite the appropriate number on all test reports and other correspondence specific to a permitted emission unit. [FAC Rule 62-297.310(8)]

14. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8364, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 444-8364 during normal working hours. [FAC Rule 62-4.130]

Expiration Date:
December 31, 1997

Issued this 16th day of July,
1996.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


ED K. MIDDLESWART, P.E.
Air Program Administrator

GENERAL CONDITIONS:

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,

GENERAL CONDITIONS:

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 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.

GENERAL CONDITIONS:

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.