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

Air Operation Permit
Permit No.: 0630039-005-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, FL 32501-5794
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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.

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SIC Nos.: 07, 0724
Project: Air Operation Permit

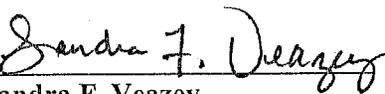
This permit is for the operation of the Marianna Gin located in Marianna, Jackson County; UTM Coordinates: Zone 16, 670.30 km East and 3416.30 km North; Latitude: 30° 52' 11" North and Longitude: 85° 13' 06" West.

STATEMENT OF BASIS: This air 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.

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

Effective Date: August 7, 2001
Renewal Application Due Date: June 9, 2006
Expiration Date: August 7, 2006

**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**


Sandra F. Veazey
Air Program Administrator

SFV/kwc

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 22 cyclones. Three LP gas-fired heaters; of eight, four and three MMBtu per hours of heat input; are used to dry the seed cotton during unloading and conveying. Cleaned (lint) cotton is baled as the final product. A 2 MMBtu per hour steam generator is used to humidify the cotton as it is baled.

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 or heater 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. Seed cotton is then processed through tower dryers and then 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 bur machine. 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, and 3. The gin 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 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, C13 C14, and C15. Emissions from the nit trash fan are controlled by cyclone 20. 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. 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 then 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, C18, and C23. A 2 MMBtu per hour 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 spray to control fugitive emissions.

Based on the permit application received July 16, 2001, this facility is not a major source of hazardous air pollutants (HAPs).

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

E.U. ID

<u>No.</u>	<u>Brief Description</u>
006	Cotton Gin Operations

Emission Units 001 (raw cotton unloading), 002 (seed cotton cleaning), 003 (lint cotton handling), 004 (trash from lint cotton, mote and seed handling), and 005 (conveying/drying operation air heaters and steam generator), utilized in construction permit No. 0630039-004-AC, have been incorporated into the facility-wide cotton gin operations emission unit (006), denoted above. The fuel-burning air heaters and steam generator (conveying/drying operation air heaters and steam generator) have been incorporated into this permit as conditionally exempt (condition A.2.). As long as the facility does not burn more than 85,800 gallons of propane during any 12 consecutive months, the units are exempt from permitting by rule 62-210.300(3)(b)1. – “Generic Emission Unit Exemption.” The fuel limit (85,800 gallons/year) is the maximum amount of fuel burned when producing the facility limited 44,000 bales of cotton per year. If at anytime the facility expects to exceed this fuel limit, the Department must be notified and an air construction permit submitted.

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:
Permit Application received July 16, 2001

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 which 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, volatile organic compounds (VOC) or organic solvents (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. 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.[Rule 62-296.320(4)(c)2., F.A.C.]
6. 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.]

7. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications 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.
[Rule 62-4.090, F.A.C.]

8. 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 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8364, press 7; Fax: 850/595-8096

Notification of compliance testing may be submitted by electronic mail to NWDAIR@dep.state.fl.us. 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.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

Emission Unit 006

✓ **Raw Cotton Unloading**

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

✓ **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

✓ **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

✓ **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

(Conditionally Exempt) 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 unit(s) 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 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) or 85,800 gallons of propane (conditional exemption limit for air heaters and steam generator) per 12 consecutive month period (year). The Permittee shall maintain monthly throughput and fuel usage records, which shall be made available for Department inspection (Condition A.8.).

[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 12 consecutive month period. The Permittee shall maintain operational records available for Department inspection certifying the total hours of operation (Condition A.8.).

[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 percent opacity.

[Rule 62-296.320(4)(b)1., F.A.C.]

Test Methods and Procedures

A.5 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 for 30 minutes on the one cyclone from the ~~(Raw Cotton Unloading, Seed Cotton Cleaning, Lint Cotton Handling)~~ and ~~(Trash From Lint Cotton, Mote and Seed 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. 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.

[Rule 62-297.310(2), F.A.C.]

A.6. 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.

[Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

A.7. Testing emissions shall be conducted with the sources operating at capacity. Capacity is defined as 90-100 percent 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 percent of 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.

[Rules 62-297.310(2) and 62-4.070, F.A.C.]

Recordkeeping and Reporting Requirements.

A.8. The Permittee shall maintain throughput, fuel usage, and operational hours records certifying total throughput, fuel usage, and total hours of operation. This information shall be provided in the form of a monthly summary and kept on site, for Department inspection, for at least five years.
[Rules 62-4.160(2) and Rule 62-210.200 (PTE), 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 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.

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GENERAL CONDITIONS:

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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.