

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

PERMIT BOOK

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: 062008-001 Project Number: 2008-02-055

Parent Company: McCord Gin Company

Parent Company Address: 999 South Main (HWY 153), Gideon, MO, 63848

Installation Name: McCord Gin Company South

Installation Address: 999 South Main (HWY 153), Gideon, MO, 63848

Location Information: New Madrid County, S36, T21, R10

Application for Authority to Construct was made for:

McCord Gin Company is increasing their capacity from 36 bales/hr to 45 bales/hr by installing a booster pump for their bale press. They are also installing a mote baling process. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

-
- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

JUN - 4 2008

EFFECTIVE DATE

Handwritten signature of Steven J. Fisher in black ink.

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the departments' Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

STATE OF MISSOURI



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MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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Standard Conditions (on reverse) are applicable to this permit.

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EFFECTIVE DATE

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Permit No.	
Project No.	2008-02-055

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

McCord Gin Company South
New Madrid County, S36, T21, R10

1. **Superseding Condition**
The conditions of this permit supersede all special conditions found in the previously issued construction permit (Permit Number 0996-021) from the Air Pollution Control Program.
2. **Emission Limitation**
 - A. McCord Gin Company South shall emit less than 30 tons of particulate matter less than ten (10) microns in diameter (PM₁₀) in any consecutive 12 month period from the emission points listed in Table 2: Project Emissions Calculations.
 - B. McCord Gin Company South shall maintain an accurate record of PM₁₀ emitted into the atmosphere. Attachment A or an equivalent form shall be used for this purpose. McCord Gin Company South shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
 - C. McCord Gin Company South shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 2.B indicate that the source exceeds the limitation of Special Condition Number 2.A.
3. **Control Device Requirement – Cyclones**
 - A. The cyclones must be in use at all times on all high pressure exhausts when this plant is in operation and shall be operated and maintained in accordance with the manufacturer's specifications.
 - B. McCord Gin Company South shall maintain an operating and maintenance log for the cyclones that shall include the following:

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Project No.	2008-02-055

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

- 1) Incidents of malfunction: with impact on emissions, duration of event, probable cause and corrective actions.
- 2) Maintenance activities: with inspection schedule, repair actions and replacements, etc.

4. Control Device Requirement – Screens

- A. The screens must be in use at all times on all low pressure exhausts when this plant is in operation and shall be operated and maintained in accordance with the manufacturer's specifications.
- B. McCord Gin Company South shall maintain an operating and maintenance log for the screens that shall include the following:
 - 1) Incidents of malfunction: with impact on emissions, duration of event, probable cause and corrective actions.
 - 2) Maintenance activities: with inspection schedule, repair actions and replacements, etc.

5. Fugitive Emission Control Requirement

- A. McCord Gin Company South shall apply a chemical dust suppressant or water to all unpaved portions of the haul roads and vehicular activity areas (other than employee parking areas). The suppressant will be applied in accordance with the manufacturer's suggested application rate and re-applied as necessary to maintain an adequate ground inventory to control fugitive emissions. The following conditions apply to watering:
 - 1) The water application rate shall be 30 gallons per 1000 square feet at least once every four (4) hours.
 - 2) A quarter inch or more rainfall during the preceding 24 hours shall substitute for one (1) daily water application
 - 3) Water/surfactant application shall not be required when the ground is frozen or when there will be no traffic on the roads.
- B. McCord Gin Company South shall record the time, date and the amount of material applied for each application of the dust suppressant.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2008-02-055
Installation ID Number: (143-0034)
Permit Number:

McCord Gin Company South
999 South Main (HWY 153)
Gideon, MO, 63848

Complete: February 19, 2008

Parent Company:
McCord Gin Company
999 South Main (HWY 153)
Gideon, MO, 63848

New Madrid County, S36, T21, R10

REVIEW SUMMARY

- McCord Gin Company South has applied for authority to install a mote baler and modify its process to increase the capacity from 36 bales per hour to 45 bales per hour.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- High efficiency cyclones and screens are being used to control the PM₁₀ emissions from the equipment in this permit.
- This review was conducted in accordance with Section (Section 5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are conditioned below de minimis levels.
- This installation is located in New Madrid County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].

- Ambient air quality modeling was not performed since potential emissions of the application are conditioned below de minimis levels.
- Emission testing is not required for the equipment.
- A Basic Operating Permit application is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

McCord Gin South, formerly known as Fletcher’s Gin, is a cotton ginning facility. Cotton ginning is the process whereby cotton is removed from the seed. The cotton is brought into the installation and transferred to dryers where the moisture content is reduced. The cotton is then conveyed to a cleaner that removes small objects (leaves, sand, dirt, etc.) and then to a second cleaner that removes larger objects (sticks, trash, stems, etc.). After this, the cotton is transferred to gin stands that remove more of the hulls, sticks and other trash. The gins extract the seeds from the cotton and then transfer the remaining cotton product, called lint cotton, to battery condensers. The condenser’s job is to remove the lint cotton from the air, collecting the material together and pressing it into bales.

McCord Gin South was issued only (1) construction permit (Permit No. 0996-021) which limited the facility to 15 tons of PM₁₀ emissions. Although the facility holds an intermediate operating permit, this was not required since their facility was limited to less than de minimis levels. Since this project will have an additional limit of 15 tons of PM₁₀ emissions, their facility will have a new conditioned potential of 30 tons of PM₁₀ emissions, and McCord Gin South should apply for a basic operating permit.

The following permits have been issued to McCord Gin Company South from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
0996-021	Completed 9/30/1996 - New Equipment
143-0034-0001	Completed 11/24/1997 - Intermediate Operating Permit
0996-021A	Completed 1/28/1998 - Amendment adding two existing gin stands to the previous construction permit.
OP2002-08-133	Completed 4/9/2007 - Intermediate Operating Permit Renewal

PROJECT DESCRIPTION

McCord Gin South has applied for the authority to install a booster pump on their baler press which will increase their maximum design rate from 36 bales per hour to 45 bales per hour. In addition to the booster pump, they are also adding a mote baler. The new mote baling operation will add just one new emission point, a mote fan. Increased emissions will be controlled with the existing cyclones and screens and the addition of

one new cyclone for the mote baling operation.

EMISSIONS/CONTROLS EVALUATION

PM₁₀ is the pollutant of concern for this project. PM₁₀ emissions are controlled through the use of high efficiency cyclones on high pressure exhausts and the use of screens on the exhausts for the saw type lint cleaner and the battery condenser. These control efficiencies have been incorporated into the emission factors. The emission factors and control efficiencies used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP 42, Fifth Edition, *Compilation of Air Pollutant Emission Factors* Volume I, Section 9.7 *Cotton Ginning*, June 1996. Documented daily watering of the haul road will satisfy the requirement for 90% control efficiency.

Table 2: Project Emissions Calculations

Point ID	Description	MHDR	Units	PM ₁₀ Emission Factor	Units	Control %	PTE (lb/hr)	PTE (tons/yr)
EP-1	Unloading	45	bales /hr	0.12	lb/bale	N/A	5.400	23.652
EP-2	#1 Dryer	45	bales /hr	0.12	lb/bale	N/A	5.400	23.652
EP-3	#2 Dryer	45	bales /hr	0.093	lb/bale	N/A	4.185	18.330
EP-4	Lint Cleaner	45	bales /hr	0.55	lb/bale	N/A	24.750	108.405
EP-5	Battery Condenser	45	bales /hr	0.085	lb/bale	N/A	3.825	16.754
EP-6	Mote Fan	45	bales /hr	0.13	lb/bale	N/A	5.850	25.623
EP-7	Master Trash Fan	45	bales /hr	0.074	lb/bale	N/A	3.330	14.585
EP-8	Dryer Heater (Propane)	0.0213	1000 gal/hr	0.4	lb/1000 gal	N/A	0.009	0.037
EP-9	Haul Road (600 ft)	0.7867	VMT/hr	1.69567	lb/VMT	90	0.133	0.584
Installation Potential Emissions							231.62	tons/yr
2006 Emissions							15.64	tons
2007 Emissions							19.68	tons
Project Emissions = Installation Potential – Limited Potential							216.62	tons/yr
Composite Emission Factor							1.175	lb/bale
Estimated production based on a limit of <30 tons of PM ₁₀							51,057	bales/yr

N/A = Not Applicable

Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). The potential emissions of the project were determined by subtracting the actual emissions from the new potential emissions for the installation. Since the last two years of emissions data exceeded the limit of 15 tons, the actual emissions were reduced to 15 tons for the calculation.

Table 3: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Conditioned Potential Emissions	Existing Actual Emissions (2007 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	< 15	19.68	216.62	< 30
SO _x	40.0	N/A	N/A	N/A	N/A
NO _x	40.0	N/A	N/A	N/A	N/A
VOC	40.0	N/A	N/A	N/A	N/A
CO	100.0	N/A	N/A	N/A	N/A
HAPs	10.0/25.0	N/A	N/A	N/A	N/A

N/A = Not Applicable

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are conditioned below de minimis levels.

APPLICABLE REQUIREMENTS

McCord Gin Company South shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Katharine F. Jantz
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated February 15, 2008, received February 19, 2008, designating McCord Gin Company as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Southeast Regional Office Regional Office Site Survey, dated March 28, 2008.

Mr. Jeff Lindsey
General Manager
McCord Gin Company South
999 South Main (HWY 153)
Gideon, MO, 63848

RE: New Source Review Permit - Project Number: 2008-02-055

Dear Mr. Lindsey:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Kathi Jantz, at the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:kjl

Enclosures

c: Southeast Regional Office
PAMS File: 2008-02-055

Permit Number: