Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

Facility Name: South Georgia Cotton Gin LLC
Facility Address: 438 Broxton Hwy
Hazlehurst, Georgia 31539 Jeff Davis County
Mailing Address: 438 Broxton Highway
Hazlehurst, Georgia 31539
Facility AIRS Number: 04-13-161-00016

is issued a Permit for the following:

The construction and operation of a Cotton Gin Plant, including associated air pollution control equipment.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 24028 dated October 20, 2016; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 4 pages.

[Signed]

Richard E. Dunn, Director
Environmental Protection Division
1. General Requirements

1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.

1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.

1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.

1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.

1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

2.1 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from all process equipment listed below, any gases which exhibit visible emissions, the opacity of which is equal to or greater than 40 percent, unless otherwise specified.

2.2 Particulate Matter emissions shall not exceed the amounts determined from Rule 391-3-1-.02(2)(q), as shown below:

\[ E = 7B^{0.5} \]
Where: \( E \) = allowable emission rate in pounds per hour; and

\( B \) = number of standard bales per hour (A standard bale is defined as a finished bale weighing 500 pounds.)

3. Fugitive Emissions

3.1 The Permittee shall take all reasonable precautions to prevent fugitive dust from becoming airborne from any operation, process, handling, and transportation or storage facility. The opacity from any fugitive dust source shall not equal or exceed twenty (20) percent. Reasonable precautions that should be taken to prevent dust from becoming airborne include, but are not limited to, the following:

[391-3-1-.02(2)(n)]

a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;

b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;

c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;

d. Covering, at all times when in motion, open-bodied trucks, transporting materials likely to give rise to airborne dust; and

e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

4. Process & Control Equipment

4.1 Routine maintenance shall be performed on all air pollution control equipment. Maintenance records shall be recorded in a permanent form suitable and available for inspection by the Division. The records shall be retained for at least five years following date of such maintenance.

4.2 All processes and operations with high-pressure exhausts shall be controlled by high efficiency cyclones.
4.3 The Permittee shall operate the applicable cyclones at all times the applicable equipment is in operation and shall be operated and maintained in accordance with the manufacturer’s specifications.

5. Monitoring

5.1 The Permittee shall implement a Preventative Maintenance Program for the cyclones. At a minimum, the following operation and maintenance checks shall be made on a weekly basis and a record of the findings and corrective actions taken shall be kept in a maintenance log. [391-3-1-.02(6)(b)1]

a. Check exterior of the cyclone for holes in the body or evidence of malfunction in the interior of the cyclones.

b. Check hoppers for bridging and plugging.

c. Check screw conveyors (or other particulate transfer devices) for proper operation to ensure dust removal.

6. Performance Testing

6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:

a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division’s Procedures for Testing and Monitoring Sources of Air Pollutants.

b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.

c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.

d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.
7. **Notification, Reporting and Record Keeping Requirements**

7.1 The Permittee shall keep a log of the number of standard bales produced each calendar month and the total produced for each ginning season. This log shall be kept for five years from the date of last entry. The log shall be available for inspection or submittal to the division.

8. **Special Conditions**

8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.

8.2 The Permittee shall keep, at the permitted facility, the originals or complete copies of his Air Quality Permit and any subsequent Amendments to it.  
[391-3-1-.03(2)(c)]

8.3 All Georgia Air Quality Permits previously issued to this facility, including Air Quality Permit No. 0724-080-8926 are hereby revoked in their entirety.

8.4 The existing cotton gin plant shall be decommissioned upon construction of the new cotton gin plant.