

BAYER SOUTHERN PRODUCTION CO., LLC ~~MONSANTO COMPANY~~ - ELOY

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1. Introduction

This permit pertains to a cotton seed delinting facility, operated by **Bayer Southern Production Co., LLC** ~~Monsanto Company~~. The facility, commonly known as **Bayer Southern Production Co.** ~~Monsanto Cotton Manufacturing Co.~~, is located at ~~4384 East Highway 84~~ **1800 East Frontier Street**, Eloy, Arizona, upon a parcel also identified by Pinal County Assessor's Parcels #~~411-03-0010 and~~ 411-12-015A. The source is situated in an area classified as **serious** non-attainment for PM₁₀.

This permit Renewal B31404.000 also includes an administrative change, where the ownership company is now Bayer South Production Co., LLC. The name of the facility has also been changed to Bayer Southern Production Co.

Permit Revision C31252.R01 authorized the following changes:

- Deleting requirements associated with the Main Delinting Facility as this facility had been decommissioned and removed.
- Deleting requirements associated with hydrogen chloride as it was not being used anymore.
- Deleting requirements associated with the Hot Water Soak (HWS) line as this facility had been decommissioned and removed.

Permit Revision C31123.R04 authorized the following changes:

- Decommissioning and removal of the existing seed treater and packaging line equipment at the Foundation Plant.
- Installation of the commercial scale seed treater/dryer and packaging line.
- Relocation of the existing baghouse dust collector from the Foundation Plant Treater line (20,700 acfm) to serve the new seed handling, aspirator, and packaging units.
- Installation of a new baghouse unit for the commercial treater unit (20,000 acfm) to control dust generated by the new commercial treater system.
- Installation of a 250 HP diesel-engine driven fire water pump.
- Installation of a 3MM Btu/hr. commercial treater air handler.

Permit Revision C31123.R03 authorized the installation of two (2) vent hoods at the existing box filling station at the gin stand. Dust collected by the two new hoods will be routed to the existing Foundation Gin Inclined Cleaner Cyclone. The efficiency of the control device will be in excess of 95%. Since the increase in PM₁₀ emissions are below the significance level, this revision is considered to be minor.

Permit Revision C31123.R02 authorized the following changes:

- Reduction in the allowable annual operating hours for the Main Plant from 5,200 hours to 3,400 hours.
- Update the process description and equipment list to match the configuration of the Main Delinting Plant, Hot Water Soak (HWS) lines and the Foundation Gin line.
- Modification of the existing seed treater line for the addition of a pelletizer.
- Clarification of permit informational descriptions and specific conditions.
- Clarifying the testing requirements for the pollutants to be tested.
- Decoupling of Hot Water Soak (HWS) System from the Main Plant delinting line.

Permit Revision C31123.R01 authorized the following modifications:

- Upgrade the dust capture and control methods on the Foundation Gin and the Delinter systems by adding proper exhaust balancing, new control equipment and adding exterior wind deflector walls.
- Replacement of 15 existing cyclones with 7 new, improved efficiency cyclones.
- Addition of a separate new baghouse control for 2 Dryer Delint Drums in the Delinter Line.
- Installation of enclosed screw conveyors to carry captured waste solids or “cull” from the cyclones and baghouse to semi-truck trailers at two loadout stations, one each for the Gin and Delinter lines.
- Installation of 2 cull waste loadout stations where semi-truck trailers will be covered by a dust hood that will exhaust through 2 new cyclones for dust control.
- Installation of a new Supersack additive unloading station at the Foundation Delinter process.
- Retire the existing 2 stage Dryer/Inclined Cleaner (ID No. 100B, retain this equipment in the permit).

The above changes meet the requirements of PCAQCD’s Code §3-2-190 for a minor revision.

Source Description

The source includes a delinter, baggers, cyclones, baghouses, and other equipment used to process and prepare raw cotton seed for use in planting the succeeding cotton crop. A complete list of equipment from which emissions are allowed by this permit is given in Section 9.A of this permit.

Facility operates a small Foundation Gin and a Delinter that processes cotton and seed from crop testing plots. This gin/delinter line can process up to approximately 3,500 tons per year of raw cotton and 2,000 tons per year of cotton seed respectively at an annual operating hours of 2,500. The gin equipment and trash handling hopper are exhausted with a 10000 scfm exhaust system. This exhaust system along with three cyclone separators operating in parallel plus 2 additional cyclones control particulate emissions. Sulfuric acid is used for the delinting process. A 5,000 scfm exhaust system serves the small delinter along with two cyclone separators operating in parallel to control particulate emissions.

The new commercial seed treater and packaging line will have a throughput of 14 tons per hour. Untreated dried product seed will be loaded manually into either a box dumper or a “bag splitter” which supplies seed to a feed hopper at the base of a bucket elevator. The elevator will convey the seed to a surge bin from which the seed will be metered through an aspirator unit. The box dumper, bag splitter, conveyors, aspirator, and surge bins will be vented to the relocated treater line baghouse.

Chemical solution and seeds will be introduced and tumbled in a rotating drum. Treated, wet seeds will be dried in the dryer which will use the heated air supplied from an air handler. Heated air will be blown through the dryer section to dry off the additive solution. The Treater Drum (ID #304 a) and the Dryer/Gas-Fired Air Handler (ID #305) are physically a single piece of equipment.

From the dryer section, the coated seed will pass through a “scalping vibratory conveyor” which knocks off excess chemical dust from the seed, and will be transferred to two packaging surge bins. The treatment mixing station will be controlled by the relocated treater baghouse. Particulate emissions from the treater, dryer, and vibratory conveyor will be controlled by the new baghouse.

From the two packaging surge bins, seed to be packed will be routed either to a SeedPak feed bin or to a bagger feed bin. SeedPak will feed a bulk packaging unit that loads boxes, and the bagger feed bin will supply seed to a Premier Tech bagging system with a capacity for about 10 bags per minute.

Filled bags of seed will be placed on a palletizer which will mechanically wrap the loaded pallet in plastic wrap for shipment. Dust emissions from the bagging system will be captured by enclosures, and controlled by the relocated treater baghouse.

Particulate emissions generated during seed conveying, chemical mixing, drying, and packing will be captured and controlled by a 20,700 scfm exhaust system. A separate exhaust system leading to a new 20,000 baghouse will control treater emissions.

2. Listing of (*Federally Enforceable*) Applicable Requirements [*Mandated by 40 CFR §70.5(c)(4)*]

- A. Those specific provisions of the Pinal-Gila Counties Air Quality Control District ("PGAQCD") Regulations, as adopted by the Pinal County Board of Supervisors on March 31, 1975, and approved by the Administrator as elements of the Arizona State Implementation Plan ("SIP") at 43 FR 50531, 50532 (11/15/78), and specifically the following rules:
- | | |
|---------|---|
| 7-3-1.1 | Emission Standards - Particulates - Visible Emissions - General |
| 7-3-1.2 | Emission Standards - Particulate Emissions - Fugitive Dust |
| 7-3-1.8 | Particulate Emissions - Process Industries |
| 7-3-5.1 | NOx Emissions - Fuel Burning Equipment |
| 4-2-040 | Fugitive Dust Standards |
| 4-1-030 | Non-attainment Area Fugitive Dust |
- B. Those specific provisions of the Pinal-Gila Counties Air Quality Control District Regulations, as last amended by the Pinal County Board of Supervisors on June 16, 1980, and approved by the Administrator as elements of the Arizona SIP at 47 FR 15579 (4/12/82), specifically, the following rules:
- | | |
|-----------|----------------------------|
| 7-3-1.1 | Visible Emissions; General |
| 7-3-1.7.F | Fuel Burning Equipment |
- C. New Source Performance Standards, General Provisions, 40 CFR Part 60, Subpart A [40 CFR §60.1-60.10, 60.12-60.17, 60.19]
- ~~D. New Source Performance Standard for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart III [40 CFR §4200 et seq.]~~
- D. Those specific provisions of the Pinal County Air Quality Control District Regulations, as last amended by the Pinal County Board of Supervisors on October 27, 2004, and approved by the Administrator as elements of the Arizona SIP at 75 FR 17307, specifically, the following rules:
- | | |
|---------|----------------------------------|
| 4-2-040 | Reasonable Precautions Standards |
|---------|----------------------------------|

3. Authority to Construct

- A. Generally [*Federally enforceable pursuant to PCAQCD Code §§3-1-010, 3-1-040 (10/12/95) approved as a SIP element at 65 FR 79742 (12/20/00)*]
- This permit authorizes operations at 4384 East Highway 84, Eloy, Arizona, on a parcel also identified by Pinal County Assessor's Parcel # 411-12-015-A. Emissions from this facility, specifically emissions from the equipment described in "Equipment Schedule" section below, and the operating configuration more fully described in the application for permit, already fall subject to the independent Federally Enforceable Limitations identified elsewhere in this permit. Therefore, based on the regulations in effect upon the date of issuance of this permit and a finding that allowable emissions from the equipment described in the Equipment Schedule will neither cause nor contribute to a violation of any ambient air quality standard even without any additional limitations, and a further finding that this does not constitute a "major emitting source" within the meaning of Code §3-3-203, this permit constitutes authority to construct and operate such equipment.
- B. Minor New Source Review Requirements - Control Requirements [*Code §§3-1-010, 3-1-040 (as amended 10/12/95) approved as a SIP element at 61 FR 15717 (4/9/96)*]; Material Permit Condition [*Code §3-1-109*]

All the control equipment as identified in Section §9.A of this permit.

C. Minor New Source Review Requirements - Equipment Authorized [*Code §§3-1-010, 3-1-040 (as amended 10/12/095) approved as a SIP element at 61 FR 15717 (4/9/96); Material Permit Condition under Code §3-1-109*]

1. All the equipment as identified in Section §9.A of this permit.
2. ~~The fire water pump shall be equipped with an hour meter, configured to record hours of operation.~~
3. ~~The 187 kW (250 HP) fire water pump shall not operate more than 100 hours each per year in accordance with Section §5.H.e of this permit.~~

4. **Emission Limitations** [*Mandated by 40 CFR §70.6(a)(1)*]

A. Allowable Emissions [*Federally enforceable pursuant to PCAQCD Code § 3-1-040 (10/12/95) approved as SIP Elements at 65 FR 79742 (12/20/00)*]

The owner/operator ("Permittee") is authorized to discharge or cause to discharge into the atmosphere those emissions of air contaminants as set forth in this permit. Unless exempted under Code §3-1-040.C, or authorized by a separate permit, by this permit or by a revision or operational change allowed under Chapter 3, Article 2 of the Code, Permittee shall not commence construction of, operate or make any modification to this source in a manner which will cause emissions of any regulated air pollutant in excess of the *minimis* amount.

B. Synthetic Minor Limitation - Particulate Matter

1. Emission Cap [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*] (Code §3-1-081.A)

Permittee shall limit emissions, in any consecutive twelve-month period, such that the emissions of particulate matter, measured as PM₁₀ are less than 100 tons.

2. Operational Limitation (Code §3-1-081.A)
 - a. Permittee shall limit the total hours of the foundation gin and delinter process, based on a twelve (12) month rolling average to 3,400 hours.
 - b. Permittee shall limit the total hours of the new commercial scale seed treater, dryer, and packaging line operation, based on a twelve (12) month rolling average to 1,200 hours.

C. Process Controls - Particulate Matter [*Federally enforceable provision pursuant to Code §§3-1-084 and Code §3-1-081.A*].

1. Foundation Gin and Delinter Plant
 - a. Particulate emissions from the gin line equipment shall be controlled in the following manner:
 - i. Gin gas dryer and unloading separator cyclone (111) shall be used to control particulate matter emissions at a nominal efficiency of at least 95 percent.
 - ii. Gin stand and incline cleaner cyclone (112) shall be used to control particulate matter emissions at a nominal efficiency of at least 95 percent.

- iii. Particulate matter emissions from the two Agra vent hoods at the box filling station shall be controlled by the gin stand and incline cleaner cyclone (112) at a nominal efficiency of at least 95 percent.
 - iv. Gin overflow separator cyclone (113) shall be used to control particulate matter emissions at a nominal efficiency of at least 95 percent.
 - v. Gin lint cleaner cyclone (114) shall be used to control particulate matter emissions at a nominal efficiency of at least 95 percent.
 - vi. Gin battery condenser cyclone (115) shall be used to control particulate matter emissions at a nominal efficiency of at least 95 percent.
 - vii. Gin dust loadout cyclone (116) shall be used to control particulate matter emissions at a nominal efficiency of at least 95 percent.
 - viii. Particulate matter emissions from the ginning dust waste loadout station (117) shall be controlled by cyclone (116) at a nominal efficiency of at least 80 percent.
- b. Particulate matter emissions from the foundation delinter plant shall be controlled in the following manner:
- i. Delinting dryer/drum A&B baghouse (131) shall be used to control particulate matter emissions at a nominal efficiency of at least 95 percent .
 - ii. Clipper air screen cleaner cyclone (132) shall be used to control particulate matter emissions at a nominal efficiency of at least 95 percent .
 - iii. Gravity table cyclone (133) shall be used to control particulate matter emissions at a nominal efficiency of at least 95 percent.
 - iv. The foundation delinting system baghouse (131) shall be used to control particulate matter emissions from dryer delint drums A and B (122 A and 122 B) and the delinting dust waste loadout station (135).

2. Commercial Treater and Packaging Line

- a. Particulate matter emissions from the commercial treater and packaging line shall be controlled in the following manner:
- i. The relocated treater line baghouse (310) shall be used to control particulate matter emissions from the box dumper (300), bag splitter (301), conveyors, aspirator (302), and surge bins at a nominal efficiency of at least 99 percent.
 - ii. The relocated treater baghouse (310) shall be used to control particulate matter emissions from the treatment mixing station at a nominal efficiency of at least 99 percent.
 - iii. The relocated treater baghouse (310) shall be used to control particulate matter emissions from the SeedPak unit (307), and Premier Tech bagging system (308) at a nominal efficiency of at least 99 percent.

- iv. The new baghouse (311) shall be used to control particulate matter emissions from the treater, dryer, and vibratory conveyor at a nominal efficiency of at least 99 percent.

3. Weekly Visual Inspections

To assure continued optimal operations of each of the control devices mentioned in §§Sections 4.C.1 and 4.C.2 above, Permittee shall make a weekly visual inspection of each such device, and if perforations or other visual defects are observed, shall cease operation until the defective device is repaired or replaced.

D. Particulate Emissions Limitations

1. Opacity Limits

- a. SIP Limitation - *[Federally enforceable pursuant to PGAQCD Reg. 7-3-1.1 (6/16/80) approved as a SIP Element at 47 FR 15579 (4/12/82)]*

The opacity of any plume or effluent shall not be greater than 40 percent as determined by Reference Method 9 in the Arizona Testing Manual.

- b. Visibility Limiting Standard *[Federally enforceable provision, pursuant to Code §2-8-300 (as amended 5/18/05) approved as a SIP element at 47 FR 15043 (3/27/06)]*

The opacity of any plume or effluent from any point source not subject to a New Source Performance Standard adopted under Chapter 6 of the Code, and not subject to an opacity standard in Chapter 5 of the Code, shall not be greater than 20% as determined in Method 9 in 40 CFR Part 60, Appendix A.

- 2. Particulate Emissions - Process Industries *[Currently federally enforceable pursuant to PGAQCD Reg. 7-3-1.8 (3/31/75) approved as a SIP element at 43 FR 50531 (11/15/78)]* (Code §5-5-190)

Permittee shall capture, to the maximum practical extent, all particulate matter resulting from operation of individual equipment comprising the complete process. Permittee not cause, suffer, allow or permit the discharge of particulate matter into the atmosphere in any one hour from any existing process source whatsoever, except fuel-burning equipment, in total quantities in excess of the amount calculated by whichever of the following equations may be applicable:

- a. For any process operating at a production process weight rate ("P") up to 30 tons-per-hour, allowable emissions ("E") shall not exceed:

$$E = 4.10 P^{0.67} \text{ pounds-per-hour.}$$

- b. For any process operating at a production process weight rates ("P") equal to or greater than 30 tons-per-hour, allowable emissions ("E") shall not exceed:

$$E = (55.0 P^{0.11} - 40.0) \text{ pounds-per-hour.}$$

- 3. Particulate Matter Reasonable Precautions *[Currently federally enforceable pursuant to Code §4-2-040 (6/29/93) approved as a SIP element at 72 FR 41896 (8/1/07) and PGAQD Reg. 7-3-1.2 approved as a SIP element at 43 FR 53034 (11/15/78)]*

- a. Permittee shall not cause, suffer, allow, or permit a building or its appurtenances, subdivision site, driveway, parking area, vacant lot or sales lot, or an urban or suburban open area to be constructed, used, altered, repaired, demolished, cleared, or leveled, or the earth to be moved or excavated, or fill

- dirt to be deposited, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
- b. Permittee shall not cause, suffer, allow, or permit a vacant lot, or an urban or suburban open area, to be driven over or used by motor vehicles, such as but not limited to all-terrain vehicles, trucks, cars, cycles, bikes, or buggies, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
 - c. Permittee shall not disturb or remove soil or natural cover from any area without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne. (Code §4-2-040.E)
 - d. Permittee shall not crush, screen, handle or convey materials or cause, suffer, allow or permit material to be stacked, piled or otherwise stored without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
 - e. Stacking and reclaiming machinery utilized at storage piles shall be operated at all times with a minimum fall of material and in such a manner, or with the use of spray bars and wetting agents, as to prevent excessive amounts of particulate matter from becoming airborne. Other reasonable precautions shall be taken, as necessary, to effectively prevent fugitive dust from becoming airborne.
 - f. Permittee shall not cause, suffer, allow or permit transportation of materials likely to give rise to fugitive dust without taking reasonable precautions to prevent fugitive dust from becoming airborne. Earth and other materials that is tracked out or transported by trucking and earth moving equipment on paved streets shall be removed by the party or person responsible for such deposits. Removal of earth from paved streets shall not violate the visibility standard in Chapter 2.
 - g. Permittee shall not cause, suffer, allow, or permit the use, repair, construction or reconstruction of any road or alley without taking every reasonable precautions to effectively prevent fugitive dust from becoming airborne.
4. Surface Stabilization [*Currently federally enforceable pursuant to Code §4-1-030 (10/28/15) approved as a SIP element at 40 CFR Part 52, FR 20267 (1/9/17)*]
- a. Permittee shall not cause or allow visible fugitive dust emissions from open areas / vacant lots (areas not being utilized for an activity) to exceed 20% opacity based on EPA Method 9 or the continuous plume or intermittent plume methods listed in PCAQCD Code §4-9-340.
 - b. Permittee shall erect barriers or no trespassing signs upon evidence of trespass on open areas / vacant lots.
 - c. Permittee shall stabilize any open area / vacant lot greater than 1.0 acre that has 0.5 acre or more of disturbed surface and sign up for the Pinal County Dust Control forecast within 30 days of discovery. The open area / vacant lot shall be stabilized the day leading up to and the day that is forecast to be high risk for dust emissions.
 - d. Permittee shall not remove vegetation from open areas / vacant lots without applying dust suppressants before and during the weed abatement. Trackout

onto paved surfaces must be prevented or eliminated and dust suppressants must be applied following weed abatement to stabilize the entire surface.

- e. Stabilization of open areas / vacant lots is determined by the drop ball, threshold friction velocity, flat vegetation or standing vegetation methods listed in PCAQCD Code 4-9-320.
 - f. Permittee shall not cause or allow visible fugitive dust emissions from unpaved lots (areas being utilized for an activity) greater than 5000 square feet to exceed 20% opacity based on EPA Method 9 or the continuous plume or intermittent plume methods listed in PCAQCD Code §4-9-340.
 - g. Permittee shall not allow silt loading equal to or greater than 0.33 oz/ft² or allow the silt content to exceed 8% on unpaved lots greater than 5000 square feet.
 - h. Permittee shall stabilize unpaved lots greater than 5000 square feet by paving, applying a dust suppressant or graveling.
 - i. Permittee shall clean up trackout on a paved public roadway that exceeds 50 feet within 24 hours of discovery and limit opacity to 20% or less while using a rotary brush or broom.
 - j. Permittee shall make a record of the control measures applied.
5. Particulate Emissions - Fuel Burning [*Currently federally enforceable pursuant to PGAQCD Reg. 7-3-1.7 (3/31/75) approved as a SIP element at 43 FR 50531 (11/15/78)*] (Code §5-21-930)

Permittee shall not cause, suffer, allow or permit the discharge of particulate matter into the atmosphere, caused by combustion of fuel, in total quantities in excess of the amount calculated by:

$$E = 1.02 Q^{0.769} \text{ pounds-per-hour.}$$

where:

E = maximum allowable particulate emissions rate (lb/hr),
 Q = total heat input of all operating fuel-burning units on a plant or premises (MMBtu/hr)

- E. Cotton Gin Standards (Code §5-8-260)
 - 1. Fugitive dust, lint, bolls, cotton seed or other material emitted from a cotton gin or lying loose in a yard shall be collected and disposed of in an efficient manner or shall be treated in accordance with the fugitive dust requirements of Chapter 4 of the Code.
 - 2. Permittee shall not cause, allow or permit to be emitted into the atmosphere particulate matter which exceeds 40% opacity.
- F. Fuel Use Limitations (Code §§3-1-081)
 - 1. Primary Fuel
 - The Permittee is allowed to burn natural gas.
 - 2. Other Fuels (Code §§3-1-081.G, 5-23-1010.F)

The Permittee shall not use used oil, used oil fuel, hazardous waste, and hazardous waste fuel (as defined in federal, state, or county codes and rules) without first obtaining a separate permit or an appropriate permit revision.

~~G. NSPS Standard for the Fire Water Pump [40 CFR §§60.4205(a), 60.4206, 60.4207(a)&(b), 60.4209(a), 60.4211(c), 40 CFR Part 60 Subpart III]~~

- ~~1. Permittee shall comply with the following emission standards pertaining to the 187 kW fire water pump:~~

Unit	Mfg. Date	Displacement per Cylinder (l)	NMHC + NOX g/kw-hr	CO g/kw-hr	PM g/kw-hr
187 kW (250 HP) Fire Water Pump	2017	1.1	4.0	3.5	0.20

- ~~3. Permittee shall operate and maintain the engine according to manufacturer's written instructions or procedures developed by the Permittee that are approved by the manufacturer, over the entire life of the engine.~~

- ~~4. Fuel Requirements:~~

~~Permittee shall use diesel fuel for the ICE that meets the requirements of 40 CFR 80.510(b): Sulfur content of 15 parts per million (ppm) maximum and a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.~~

~~H. Operational Compliance Demonstration for NSPS III Engines [40 CFR §60.4211.(f).(2)]~~

- ~~1. All the emergency stationary engines are subject to the following standards:~~

~~a. Install a non-resettable hour meter.~~

~~b. There is no time limit on the use of emergency stationary engines in emergency situations.~~

~~c. Emergency stationary engines may be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. Copies of such records shall be provided to the District upon request.~~

~~d. Emergency stationary engines may be operated for a maximum of 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response program.~~

~~e. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.~~

~~I. Standards of Performance for Stationary Rotating Machinery [Code §5-23-1010.A.B.C.D]~~

- ~~a. For equipment having a heat input rate of 4200 million Btu/hr or less, the maximum allowable emissions shall be determined by the following equation:~~

$$E = 1.02 * Q^{0.769}$$

~~Where: E = the maximum allowable particulate emissions rate in pounds-mass per hour
Q = the total heat input of all operating fuel burning units on a plant premises in million btu/hr~~

- ~~b. For equipment having a heat input rate greater than 4200 million Btu/hr or less, the maximum allowable emissions shall be determined by the following equation:~~

$$E = 17.0 * Q^{0.432}$$

~~Where: E = the maximum allowable particulate emissions rate in pounds-mass per hour
Q = the total heat input of all operating fuel burning units on a plant premises in million btu/hr~~

- ~~e. For references purposes only, the actual values shall be calculated from the applicable equations and rounded off to two decimal places.~~
- ~~d. No person shall cause, allow or permit to be emitted into the atmosphere from any stationary rotating machinery, smoke for any period greater than 10 consecutive seconds which exceeds 40% opacity. Visible emissions when starting cold equipment shall be exempt from this requirement for the first 10 minutes.~~
- ~~e. When low sulfur oil is fired, stationary rotating machinery installations shall burn fuel which limits the emission of sulfur dioxide to 1.0 pound per million Btu heat input.~~

G. General Maintenance Obligation (Code §3-1-081)

At all times, including periods of start-up, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate the permitted facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

5. Compliance Demonstration

A. Regular Emissions Monitoring

1. Non-instrumental Emissions Monitoring - Oxides of Nitrogen (Code §3-1-083)
 - a. As a surrogate measurement for monitoring emissions of oxides of nitrogen, Permittee shall maintain monthly records of natural gas purchases.
 - ~~b. Permittee shall make a monthly record of the number of hours the fire water pump is operated.~~
2. Non-instrumental Emissions Monitoring - Particulate Matter [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*] (Code §3-1-083)
 - a. Since the emissions authorized under this permit constitute a direct function of the material throughput at the source, the Permittee shall maintain records, updated at least monthly, of the weight of fuzzy cotton seed processed and the weight of cotton seed produced.
 - b. In order to demonstrate compliance with the emission control requirements under this permit, the Permittee shall maintain records, updated at least monthly, of the number of times the baghouses and cyclones are emptied or cleaned.
 - c. In order to demonstrate compliance with the emission control requirements under this permit, Permittee shall maintain a written record of the results of the weekly inspections of the control equipment required under this permit.

3. Non-instrumental Emissions Monitoring - Volatile Organic Compounds (Code §3-1-083)

As a surrogate measurement for monitoring emissions of volatile organic compounds, Permittee shall maintain monthly records of the chemicals which contain VOCs and are used in the treatment of seed. The records shall include the amounts used and the VOC content of the chemicals. Emissions of VOCs shall be calculated assuming all contained VOCs are emitted.

~~4. Non-instrumental Emissions Monitoring - Sulfur Dioxide (Code §3-1-083)~~

~~As an alternative to monitoring fuel sulfur, Permittee shall maintain a verification from the fuel supplier that sulfur content of the diesel fuel for fire water pump does not exceed 15 ppm.~~

4. Opacity Monitoring [Code §3-3-260.]

a. Stack Emissions

On at least a semi-annual basis, Permittee shall conduct a visual opacity screen performed on each process and fuel-burning exhaust stack. If visible emission are observed, Permittee shall have a full Method 9 opacity test performed by a certified opacity observer, and shall provide a copy of the resulting report to the District within 10 days.

B. Testing (Codes §§3-1-083.A.1, 3-1-170)

1. Performance Testing – Commercial Scale Seed Treater, Dryer, and Packaging Line

Permittee shall conduct performance tests to verify the emissions of particulate matter from the following exhaust stacks:

- a. New Commercial Treater/Packaging (Relocated Baghouse 310)
- b. New Commercial Treater/Packaging (Baghouse 311)

- i. Test Protocol

Test protocols for all the above tests shall be submitted to the District at least (60) days prior to the test. . The test protocol shall provide for quantifying emissions in both concentration and pounds per hour.

- ii. Performance Test Notice

Notice of each performance test required by this permit shall be submitted to the District at least fourteen (14) days prior to running the tests.

- iii. Test Reports

A copy of the test report, quantifying PM₁₀ emissions in both, concentration and pound per hour shall be submitted to the District for approval within forty-five (45) days after the test.

- iv. Recurring Testing Cycle

Permittee shall conduct performance tests within five years of the previous performance tests.

2. PM₁₀ Testing

Permittee shall conduct performance tests to verify the emissions of particulate matter from the following exhaust stacks.

- a. Gin Unloading Separator (Cyclone 111)
- b. Gin Drying/Inclined Cleaner (Cyclone 112)
- c. Gin Overflow Separator (Cyclone 113)
- d. Gin Lint Cleaner (Cyclone 114)
- e. Gin Battery Condenser (Cyclone 115)
- f. Gin Dust Loadout (Cyclone 116)
- g. Delinting Dryer/Drum (Baghouse AB 131)
- h. Clipper Air Screen Cleaner (Cyclone 132)
- i. Gravity Table (Cyclone 133)
- j. Delinter Dust Loadout (Cyclone 134)

i. Test Protocol

A test plan protocol for approval shall be submitted to the District at least sixty (60) days before the testing. The test protocol shall provide for quantifying emissions in both concentration and pounds per hour.

ii. Performance Test Notice

Notice of the performance test required by this permit shall be submitted to the District at least fourteen (14) days prior to running the test.

iii. Test Report

A copy of the test report, quantifying PM₁₀ emissions in both, concentration and pound per hour shall be submitted to the District for approval within forty-five (45) days after the test.

iv. Recurring Test Cycle

Permittee shall conduct performance tests within five years of the previous performance tests.

C. Recordkeeping [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*] (Code §3-1-083)

1. Permittee shall maintain at the source a record of all measurements, including continuous monitoring-system-, monitoring-device-, and performance- testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required pursuant to any federally enforceable provision of this permit, recorded in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports and records.
2. Permittee shall maintain records of the occurrence and duration of any start-up, shutdown or malfunction in the operation of the permitted facility or any air pollution control equipment.
3. Permittee shall maintain records of natural gas purchased.

D. Regular Compliance Reporting [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*] (Code §3-1-083.A)

In order to demonstrate compliance with the provisions of this permit, the Permittee shall submit a semi-annual report containing a summary of the information required to be recorded pursuant to this permit, which summary shall clearly show that Permittee has complied with the operational and emissions limitations under this permit. The report shall be submitted to the District within 30 days after the end of each calendar half. Appendix A of this permit is a form which may be used for the report.

E. Regular Compliance/Compliance Progress Certification (Code 3-1-085.A)(Code §3-1-083.A.4.)

Permittee shall annually submit to the Control Officer a certificate of compliance with the provisions of this permit. The certification shall:

1. Be signed by a responsible official, namely the president, secretary, treasurer, vice-president of the corporation, the director of manufacturing, or such other person as may be approved by the Control Officer as an administrative amendment to this permit;
2. Identify each term or condition of the permit that is the basis of the certification;
3. Verify the compliance status with respect to each such term or condition;
4. Verify whether compliance with respect to each such term or condition has been continuous or intermittent;
5. Identify the permit provision, or other, compliance mechanism upon which the certification is based; and
6. Be postmarked within thirty (30) days of the start of each calendar year.

6. Other Reporting Obligations

A. Deviation Reporting Requirement (Code §3-1-083.A.3.b.)

Permittee shall report any deviation from the requirements of this permit along with the probable cause for such deviation, and any corrective actions or preventative measures taken to the District within fifteen days of the deviation unless earlier notification is required by the provisions of Section 9.P. of this permit.

B. Annual Emissions Inventory (Code §§3-1-103, 3-7-590.C.1.)

Permittee shall complete and submit to the District an annual emissions inventory, disclosing actual emissions for the preceding calendar year. Submittal of the form set forth in Appendix A of this permit fulfills this requirement.

7. Fee Payment (Code §3-7-600.)

As an essential term of this permit, an annual permit fee shall be assessed by the District and paid by Permittee in accord with the provisions of Code Chapter 3, Article 7 generally, and Code §3-1-081.A.9 specifically. The annual permit fee shall be due on or before the anniversary date of the issuance of an individual permit, or formal grant of approval to operate under a general permit. The District will notify the Permittee of the amount to be due, as well as the specific date on which the fee is due.

8. General Conditions

A. Term (Code §3-1-089)

This permit shall have a term of five (5) years, measured from the date of issuance.

B. Basic Obligation (Code §3-1-081.)

1. The owner or operator ("Permittee") of the facilities shall operate them in compliance with all conditions of this permit, the Pinal County Air Quality Control District ("the District") Code of Regulations ("Code"), and consistent with all State and Federal laws, statutes, and codes relating to air quality that apply to these facilities. Any permit noncompliance is grounds for enforcement action; for a permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application and may additionally constitute a violation of the Clean Air Act (1990).
2. All equipment, facilities, and systems used to achieve compliance with the terms and conditions of this permit shall at all times be maintained and operated in good working order.

C. Duty to Supplement Application (Code §§3-1-050.H, 3-1-081.A.8.e, 3-1-110)

Even after the issuance of this permit, a Permittee, who as an applicant who failed to include all relevant facts, or who submitted incorrect information in an application, shall, upon becoming award of such failure or incorrect submittal, promptly submit a supplement to the application, correcting such failure or incorrect submittal. In addition, Permittee shall furnish to the District within thirty days any information that the Control Officer may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit and/or the Code.

D. Right to Enter (Code § 3-1-132)

Authorized representatives of the District shall, upon presentation of proper credentials, be allowed:

1. To enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this permit;
2. To inspect any equipment, operation, or method required in this permit; and
3. To sample emissions from the source.

E. Transfer of Ownership (Code §3-1-090)

This permit may be transferred from one person to another by notifying the District at least 30 days in advance of the transfer. The notice shall contain all the information and items required by Code § 3-1-090. The transfer may take place if not denied by the District within 10 days of the receipt of the transfer notification.

F. Posting of Permit (Code §3-1-100)

Permittee shall firmly affix the permit, an approved facsimile of the permit, or other approved identification bearing the permit number, upon such building, structure, facility or installation for which the permit was issued. In the event that such building, structure, facility or installation is so constructed or operated that the permit cannot be so placed, the permit shall be mounted so as to be clearly visible in an accessible place within a reasonable distance of the equipment or maintained readily available at all times on the operating premises.

G. Permit Revocation for Cause (Code §3-1-140)

The Director of the District ("Director") may issue a notice of intent to revoke this permit for cause pursuant to Code §3-1-140, which cause shall include occurrence of any of the following:

1. The Director has reasonable cause to believe that the permit was obtained by fraud or material misrepresentation;
2. Permittee failed to disclose a material fact required by the permit application form or a regulation applicable to the permit;

3. The terms and conditions of the permit have been or are being violated.

H. Certification of Truth, Accuracy, and Completeness [*Federally enforceable - Code §§3-1-083.A.5, 3-1-175 (as amended 10/12/95) approved as SIP Elements at 61 FR 15717 (4/9/96)*]

Any application form, report, or compliance certification submitted pursuant to the Code shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under Chapter 3 of the Code shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

I. Renewal of Permit (Code §3-1-050.C)

Expiration of this permit will terminate the facility's right to operate unless either a timely application for renewal has been submitted in accordance with §§3-1-050, 3-1-055 and 3-1-060, or a substitute application for a general permit under §3-5-490. For purposes of a Class I permit renewal, a timely application shall be submitted at least 6 months, but not greater than 18 months prior to the date of the permit expiration.

J. Severability (Code §3-1-081.A.7)

Pursuant to Code § 3-1-081.A.7., the provisions of this permit are severable, and if any provision of this permit is held invalid the remainder of this permit shall not be affected thereby.

K. Permit Shield (Code § 3-1-102.)

Subject to the following schedule of **exclusions**¹, compliance with the terms of this permit shall be deemed compliance with any applicable requirement identified in this permit. The permit-shield exclusions include:

1. PGCAQCD Rule §7-3-1.3 Open Burning;
2. PGCAQCD Rule §7-3-4.1 Industrial – Carbon Monoxide Emissions.
3. Items listed in Section 10 of this permit as not being federally enforceable.

L. Permit Revisions (Code Chapter 3, Article 2)

1. This permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
2. The permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
3. Permit amendments, permit revisions, and changes made without a permit revision shall conform to the requirements in Article 2, Chapter 3, of the Code.

M. Permit Re-opening (Code §3-1-087.)

1. This permit shall be reopened if:
 - a. Additional applicable requirements under the Clean Air Act (1990) become applicable to this source, and on that date, this permit has a remaining term of

¹ See the Technical Support Document for an explanation of the exclusions.

three or more years. Provided, that no such reopening under this subparagraph is required if the effective date of the newly applicable requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to Code §3-1-089.C.

- b. The Control Officer determines that it contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of it;
- c. The Control Officer determines that it needs to be revised or revoked to assure compliance with the applicable requirements; or
- d. The EPA Administrator finds that cause exists to terminate, modify, or revoke and reissue this permit.

- 2. If this permit must be reopened or revised, the District will notify the permittee in accord with Code §3-1-087.A.3.

N. Record Retention (Code §3-1-083.A.2.b)

Permittee shall retain for a period of five (5) years all documents required under this permit, including reports, monitoring data, support information, calibration and maintenance records, and all original recordings or physical records of required continuous monitoring instrumentation.

O. Scope of License Conferred (Code §3-1-081.)

This permit does not convey any property rights of any sort, or any exclusive privilege.

P. Excess Emission Reports; Emergency Provision (Code §3-1-081.E, Code §8-1-030)

- 1. To the extent Permittee may wish to offer a showing in mitigation of any potential penalty, underlying upset events resulting in excess emissions shall reported as follows:
 - a. The permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. Such report shall be in two parts:
 - i. Notifications by telephone or facsimile within 24 hours or the next business day, whichever is later, of the time when the owner or operator first learned of the occurrence of excess emissions, including all available information required under subparagraph b. below.
 - ii. Detailed written notification within 3 working days of the initial occurrence containing the information required under subparagraph b. below.
 - b. The excess emissions report shall contain the following information:
 - i. The identity of each stack or other emission point where the excess emissions occurred.
 - ii. The magnitude of the excess emissions expressed in the units of the applicable limitation.
 - iii. The time and duration or expected duration of the excess emissions.
 - iv. The identity of the equipment from which the excess emissions occurred.

- v. The nature and cause of such emissions.
 - vi. If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions.
 - vii. The steps that were or are being taken to limit the excess emissions. To the extent this permit defines procedures governing operations during periods of start-up or malfunction, the report shall contain a list of steps taken to comply with this permit.
 - viii. To the extent excess emissions are continuous or recurring, the initial notification shall include an estimate of the time the excess emissions will continue. Continued excess emissions beyond the estimated date will require an additional notification.
2. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
 3. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of the following subparagraph are met.
 4. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
 - d. The permittee submitted notice of the emergency to the Control Officer by certified mail or hand delivery within 2 working days of the time when emissions limitations were exceeded due to emergency. The notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

9. Equipment

A. Equipment for which emissions are allowed by this permit are as follows:

ID	Name	Manufacturer	Model	Year	Size
100A	1 st stage Gin Line Dryer	Samuel Jackson	HG-4-1404 Sidekick	2008	4 mmbtu/hr
100C	Unloading Separator	Home Built	NA	NA	2.4 tons/hr
101	Module Feeder/Suction Tube	Chreekee	NA	2008	2.4 tons/hr

102	Incline Cleaner	NA	NA	NA	2.4 tons/hr
103	Gin Stand	Home Built	NA	NA	2.4 tons/hr
104A	Gin Incline Cleaner	Champ	NA	NA	2.4 tons/hr
104B	Gin Incline Lint Cleaner	Lummus Corporation NA	Sentinel II, 31.425J NA	2022 NA	2.4 tons/hr
104C	Battery Condenser	NA	NA	NA	2.4 tons/hr
105	Overflow Separator	NA	NA	NA	NA
111	Gin Dryer and Unloading Separator Cyclone	Compass	M240/HF-48	2013	Body = 48" Dia 7,150 scfm
112	Gin Stand and Inclined Cleaner Cyclone	Compass	M240/HF-56	2013	Body = 56" Dia 9,300 scfm
113	Gin Overflow Separator Cyclone	Compass	M240/HF-40	2013	Body = 40" Dia 5,300 scfm
114	Gin Lint Cleaner Cyclone	Compass	M240/HF-54	2013	Body = 54" Dia 9,000 scfm
115	Gin Battery Condenser Cyclone	Compass	M240/HF-56	2013	Body = 56" Dia 10,000 scfm
116	Gin Dust Loadout Cyclone	Compass	M240/HF-36	2013	Body = 36" Dia 4,100 scfm
117	Ginning Dust Waste Loadout Station	Custom	N/A	2013	Semi-truck Trailer
120	Delinter Plant Loading Hopper	NA	NA	NA	NA
121	Dryer/Delinter Heaters-2	Cimco	Series 988/989	1997	2 @ 1.0 mm btu/hr
122AB	Delinter Plant Drum (2 each)	L.T. Kincer	NA	1997	2 tons/hr
124	Clipper Cleaner	Clipper Manufacturing	X2948D	NA	2 tons/hr
125	Gravity Table	LMC Manufacturing	541-8635	NA	2 tons/hr
126	Box Filling/Bagger	NA	NA	NA	NA
131	Delinting Dryer/Drum A&B and Delinter Dust Loadout Baghouse	Compass	HIRF 232/8	2013	20,000 acfm
132	Clipper Air Screen Cleaner Cyclone	Compass	M240/HF-56	2013	Body = 56" Dia 9,700 scfm
133	Gravity Table Cyclone	Compass	M240/HF-52	2013	Body = 52" Dia 8,100 scfm

135	Delinting Dust Waste Loadout Station	Custom	NA	2013	Semi-truck Trailer
136	Supersack Unload Station with Auger	Hapman	Bulk Bag Stand, Series 300 Auger	2013	30-140 lbs/hr
210	Box Dumper	Home Built	NA	NA	NA
213	Agra Inc. Vent Hoods				1,000 cfm
300	Box Dump Infeed Hopper (Relocated)	Home Built	NA	2014	23 tph
301	Bag Splitter	Brtaney	TBD	2017	23 tph
302	Air Aspirator (Relocated)	Kice	4E48	2014	23 tph
303	Treatment Mix Station (TMTS)	Custom	TBD	2017	
304a	Treater Drum	Vector	VHC-170L1	2017	10 tph
305	Dryer/Gas-Fired Air Handler	Stelter-Brink Burner	NA	2017	3 MM Btu/hr.
306a,b	Packaging Surge Bin (2)	TBD	TBD	2017	23 tph
306c	Vibratory Conveyor	Anex	TBD	2017	23 tph
307	Seed Pack Bulk Packer	Custom	TBD	2017	23 tph
308	Bagging Station	Premier Tech	PTH-920	2017	10 bags/min
309	Palletizer (Relocated)	Chantland Corp		2014	23 tph
310	House Baghouse (Relocated)	CABCORP, Inc.	12TR10X156	2006	20,000 scfm
311	Treater and Packaging Baghouse	Farr	GS16	2017	13,000 scfm
400	Emergency Fire Water Pump	Armstrong (Pump) Clarke (Engine)	Engine— JU6H— UFADRS	2017	187 kW (250 HP)

B. Insignificant Activities:

Any activity that is not otherwise subject to any applicable requirement and which meets the following requirements or belongs to one of the following categories:

1. Electric hot water heaters for the hot water baths in the main delinting plant and Foundation Delinter;
2. Seed drying, distribution and storage for the Foundation delinting hot water soak system;
3. Electric heater to supply dry, heated air to the treatment drying drum;
4. Fuzzy cotton seed storage bays;
5. Portable bagging stations located inside the treatment and packing building to bag small quantities or low volume of treated product;
6. All vehicular traffic on paved/unpaved plant roads;
7. Seed treatment chemical storage, loading and unloading by truck;

8. Normal landscaping, building maintenance or janitorial activities;
9. Gasoline storage tanks with a capacity of 500 gallons or less;
10. Diesel and fuel oil storage tanks with a capacity of 40,000 gallons or less;
11. Batch mixers with rated capacity of ~~2.2~~ 5 cubic feet or less;
12. Hand-held or manually operated equipment used for aerosol can spray painting, buffing polishing, carving, cutting, drilling, machining, routing, sanding, sawing, surface grinding or turning of ceramic art work, precision parts, leather, metals, fiber board, masonry, carbon, glass or wood, but not including sand blasting;
13. Powder coating;
14. Internal combustion engine driven compressors, IC engine driven electrical generator sets and IC driven water pumps of less than 325 horsepower, used only for emergency replacement or standby service and whose annual operating hours never exceed 72;
15. Lab equipment used exclusively for chemical and physical analyses;
16. Any other activity which accounts for less than 1% of the source's total existing emissions of conventional air pollutants or less than 200 pounds per year of regulated pollutants, whichever is less.
17. **Emergency fire water pump, Clark, JU6H-UFADR8, 2017, 250 HP (187 kW)**

C. Emission Inventory Table

Processes	Emission Units	Pollutants	Tons/Year
	Natural Gas Fired Heaters	Nitrogen Oxides (NO _x)	1.0 2.12
		Carbon Monoxide (CO)	0.84 1.78
		Sulfur Dioxide (SO _x)	0.01 0.10
		Particulate Matter (PM ₁₀)	0.08 0.16
		Volatile Organic Compounds (VOCs)	0.06 0.12
		Hazardous Air Pollutants (HAPs)	0.02 0.40
Foundation Gin and Delinter	Foundation Gin and Delinter Cyclones	Particulate Matter (PM ₁₀)	6.74 11.3
	Foundation Delinter Baghouse	Particulate Matter (PM ₁₀)	1.87 3.9
New Commercial Treater and Packaging Line	Baghouses (310 & 311)	Particulate Matter (PM ₁₀)	0.07 3.81
		Volatile Organic Compounds (VOCs)	1.05
	Fire Water Pump	Nitrogen Oxides (NO_x)	0.4
		Carbon Monoxide (CO)	0.1
	Air Handler	Nitrogen Oxides (NO _x)	0.5 1.3
		Carbon Monoxide (CO)	0.42 1.1

		Sulfur Dioxide (SO _x)	< 0.1
		Particulate Matter (PM ₁₀)	0.04
		Volatile Organic Compounds (VOCs)	0.03
		Hazardous Air Pollutants (HAPs)	0.01
Chemical Usage		Particulate Matter (PM ₁₀)	0.27
		Volatile Organic Compounds (VOCs)	2.55
		Hazardous Air Pollutants (HAPs)	0.12

Appendix A

Semi-annual Report

Permit ~~C31252.R01~~ B31404.000

Abstract

This constitutes a semi-annual report, documenting emissions and use of emission-generating materials during the subject reporting period.

Facility - Bayer Southern Production Co., LLC
1800 East Frontier Street, Eloy, AZ
~~Monsanto Company~~
4384 East Highway 84, Eloy, AZ

Reporting Period - January to June _____ or July to December _____ Year _____

Material Report

Plant operation - _____ hours

Fuzzy seed processed - _____ tons.

Cotton seed produced - _____ tons.

Natural gas purchased - _____ therms. (From bill)

Volatile organic compound emissions - _____ pounds.

Fire Pump Report

Operation of the fire water pump during the reporting period _____ hours

Sulfur in diesel _____ percent

Were the standards in §4.G.1 met during the reporting period?..... Yes _____ No _____

Were the verifications for diesel fuel from the supplier maintained as required in section §5.A.4 of this permit?
Yes _____ No _____

Performance Tests

Was the performance test for the commercial scale seed treater, dryer and packaging line conducted as required under Section §5.B.1 of this permit? Yes _____ No _____

If yes, please list the date of the most recent performance test _____

Was the performance test for PM₁₀ conducted as required under Section §5.B.2 of this permit? Yes _____ No _____

If yes, please list the date of the most recent performance test _____

Certification by Responsible Official

I certify that, based on information and belief formed after reasonable inquiry, that the statements and information in this report are true, accurate and complete.

Signed _____

Printed Name _____

Title _____

Date _____

Contact Phone Number _____

Email to: compliancereports@pinal.gov, or

Mail to: Pinal County Air Quality Control District
 P.O. Box 987
 Florence, AZ 85132