

Bryan W. Shaw, Ph.D., *Chairman*  
Carlos Rubinstein, *Commissioner*  
Toby Baker, *Commissioner*  
Zak Covar, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
*Protecting Texas by Reducing and Preventing Pollution*

June 22, 2012

MR BRETT J MIKESKA  
MANAGER  
WINGATE GIN CORPORATION  
PO BOX 167  
WINGATE TX 79566-0167

Re: Permit Alteration  
Permit Number: 73188  
Grain Elevator  
Wingate, Runnels County  
Regulated Entity Number: RN101294155  
Customer Reference Number: CN601253438

Dear Mr. Mikeska:

This is in response to your letter received May 31, 2012, requesting alteration of the conditions and maximum allowable emission rates table (MAERT) of the above-referenced permit. We understand that you are requesting that your permit be revised to reflect the review of maintenance, startup, and shutdown emissions.

As indicated in Title 30 Texas Administrative Code § 116.116(c) [30 TAC § 116.116(c)], and based on our review, Permit Number 73188 is altered. Enclosed are the altered permit conditions and MAERT to replace those currently attached to your permit. Please attach these to your permit.

Planned startup and shutdown for the sources identified on the MAERT have been reviewed and included in the MAERT. Maintenance activities are not authorized by this permit and will need separate authorization, unless the activity can meet the conditions of 30 TAC § 116.119.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Stephen Anderson, P.E. at (512) 239-1287 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

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TCEQ  
CENTRAL FILE ROOM

Mr. Brett J Mikeska

Page 2

June 22, 2012

Re: Permit Number: 73188

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Wilson", with a stylized flourish at the end.

Michael Wilson, P.E., Director  
Air Permits Division  
Office of Air  
Texas Commission on Environmental Quality

MPW/sea

Enclosure

cc: Air Section Manager, Region 3 - Abilene

Project Number: 178732

## Special Conditions

Permit Number 73188

### Emission Limitations

1. This permit authorizes those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and those sources are limited to the emission rates and other conditions specified in the table. In addition, this permit authorizes all emissions from planned startup and shutdown activities associated with facilities or groups of facilities that are authorized by this permit. **(06/12)**

Emission limits for the facility are based on the following:

<u>Source Name</u>	<u>Maximum Hourly Throughput (Tons)</u>	<u>Maximum Annual Throughput (Tons)</u>
Truck Receiving Pit (Emission Point No. [EPN] Pit 1)	360	25,000
Truck Load-out Spout (EPN L1)	60	--
Truck Load-out Spout (EPN L2)	300	--
Truck Load-out Spout (EPN L3)	100	--
Truck Load-out Spout (EPN L4)	100	--
Truck Load-out Operations	--	25,000

No changes shall be made to the above limitations without prior approval by the Texas Commission on Environmental Quality (TCEQ).

### Operational and Work Practice Representations

2. As represented in the permit application, the following shall occur:
  - A. Fugitive emissions from all receiving pits shall be minimized through the use of "choke feeding." Operation of conveyors associated with receiving shall not commence until the receiving pits are full.
  - B. All loadout devices (augers, drop spouts, etc.) shall be equipped with drop socks at the drop point to minimize fugitive emissions from loadout areas.
  - C. Spillage of any raw products, finished products, or waste products shall be picked up and properly disposed of on a daily basis.

Special Conditions  
Permit Number 73188  
Page 2

- D. All in-plant roads, truck loading and unloading areas, parking areas, and other traffic areas shall be sprinkled with water, and/or be treated with effective dust suppressant(s), and/or be paved (with a cohesive hard surface) and cleaned as necessary to maintain compliance with all TCEQ rules and regulations.

Recordkeeping Requirements

3. Records of annual seasonal throughputs shall be maintained at this facility and made available during site inspections at the request of personnel from the TCEQ to show compliance with Special Condition No. 1. These records shall be retained for a rolling 24-month period.

Date June 22, 2012

# Emission Sources - Maximum Allowable Emission Rates

Permit Number 73188

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
Pit 1	Truck Receiving Pit	PM PM <sub>10</sub>	6.12 0.90	0.21 0.03
L1	Truck Loadout Spout	PM PM <sub>10</sub>	5.16 1.74	-- --
L2	Truck Loadout Spout	PM PM <sub>10</sub>	25.80 8.70	-- --
L3	Truck Loadout Spout	PM PM <sub>10</sub>	8.60 2.90	-- --
L4	Truck Loadout Spout	PM PM <sub>10</sub>	8.60 2.90	-- --
	Total Loadout Operations	PM PM <sub>10</sub>	-- --	1.08 0.36

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) PM - total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as represented  
 PM<sub>10</sub> - total particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub>, as represented
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Planned startup and shutdown emissions are included. Maintenance activities are not authorized by this permit.

Date: June 22, 2012

### **§116.119. De Minimis Facilities or Sources**

(a) Facilities or sources that meet the conditions of one or more of the paragraphs of this subsection are considered by the commission to be de minimis, which means that registration or authorization prior to construction is not required:

(1) categories of facilities or sources included on the list entitled De Minimis Facilities or Sources;

(2) facilities or sources at a site which, in combination, use the following materials at no more than the rate prescribed in subparagraphs (A) - (F) of this paragraph:

(A) cleaning and stripping solvents, 50 gallons per year;

(B) coatings (excluding plating materials), 100 gallons per year;

(C) dyes, 1,000 pounds per year;

(D) bleaches, 1,000 gallons per year;

(E) fragrances (excluding odorants), 250 gallons per year;

(F) water-based surfactants/detergents, 2,500 gallons per year;

(3) facilities or sources located inside a building at a site which meet the following sitewide emission rate caps based on the July 19, 2000 Effects Screening Levels (ESL) list without the addition of control devices, as defined in 101.1 of this title (relating to Definitions).

ESL of Substance(s) (microg/m <sup>3</sup> )	Emission Rate Cap for Individual Substances, Sitewide		Emission Rate Cap for Multiple Substances, Sitewide	
	(pounds/day)	(tons/year)	(pounds/day)	(tons/year)
≥3500	5	0.9	10	2.4
1200-3499	3	0.5	6	1.3
400-1199	1	0.2	3	0.5
100-399	0.25	0.05	1	0.2

(4) any individual facility, source, or group of facilities or sources which the executive director determines to be de minimis based upon:

(A) proximity to receptors;

(B) rate of emission of air contaminants;

(C) engineering judgment and experience; and

(D) determination that no adverse toxicological or health effects would occur off property.

(b) De minimis facilities or sources at a site which are subsequently determined by the executive director to be in violation of any commission rule, permit, order, or statute within the commission's jurisdiction, will no longer be considered de minimis and must obtain registration or authorization under this chapter or Chapter 106 of this title (relating to Permits by Rule).

(c) The List of De Minimis Facilities or Sources will be maintained in the commissions Office of Permitting and Registration in Austin, with copies maintained in the commissions regional offices, and on the commission's home page on the World Wide Web.

(1) Persons may petition the executive director to amend the List of De Minimis Facilities or Sources or the executive director may amend the list as necessary.

(2) When amending the list to add or delete categories of facilities, sources, or groups of facilities or sources, the executive director will consider, at a minimum, the following:

- (A) typical operating scenarios;
- (B) typical design and location;
- (C) the types and rates of air contaminants emitted;
- (D) engineering judgment and experience; and
- (E) toxicological or health impacts.

(3) When amending the list to add or delete categories of facilities, sources, or groups of facilities or sources, the executive director will publish notice of the proposed amendment on the commission's home page on the World Wide Web and will allow 30 days for comments. If a category of facilities, sources, or groups of facilities or sources is deleted from the list, the owner or operator will have 180 days from the date of publication of the amended list on the commissions home page on the World Wide Web to obtain, register, or apply for authorization under this chapter or Chapter 106 of this title (relating to Permits by Rule).

## Permit Alteration Source Analysis & Technical Review

Company	Wingate Gin Corporation	Permit Number	73188
City	Wingate	Project Number	178732
County	Runnels	Account Number	N/A
Project Type	Revision	Regulated Entity Number	RN101294155
Project Reviewer	Stephen Anderson, P.E.	Customer Reference Number	CN601253438
Site Name	Grain Elevator		

### Project Overview

The company has requested an alteration of their permit to include the representation of planned startup and shutdown emissions. Language in Special Condition number one and a new footnote (5) on the Maximum Allowable Emission Rates Table have been added to the permit. Maintenance activities will be authorized either under Permit by Rule or claimed under 30 Texas Administrative Code § 116.119, De Minimis Facilities or Sources. Emissions from planned startup and shutdown activities will be authorized by this permit.

Startup and shutdown emissions are virtually indistinguishable from production emissions. Although there may be minor emissions associated with startup and shutdown, particulate emission factors used to quantify production emissions are considered to have enough conservatism to include any incidental increases that may be attributed to startup and shutdown.

This request will not result in a change in method of control of emissions, a change in character of emissions, or an increase in actual emissions or the emission rates of any air contaminant authorized by this permit. This project meets the requirements for an alteration.


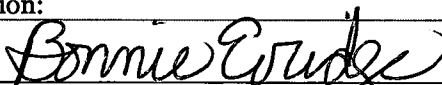
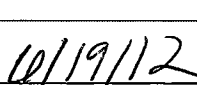
### Request for Comments

Received From	Program/Area Name	Reviewed By	Comments
Region:	3	n/a	This alteration is only for the purpose of addressing maintenance, startup, and shutdown emissions.

### Permit Concurrence and Related Authorization Actions

Is the applicant in agreement with special conditions?		Yes
Company representative(s):		Mr. K. Green
Contacted Via:		mail
Date of contact:		5/31/2012
Other permit(s) or permits by rule affected by this action:		No

 Project Reviewer Stephen Anderson, P.E.	 Bonnie Evridge Team Leader/Section Manager/Backup	 Date 10/19/12
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## Texas Cotton Ginners' Association

408 West 14th Street  
Austin, Texas 78701-1619  
512.476.8388  
Fax 512.476.8215  
Website [tcga.org](http://tcga.org)

### Officers and Executive Committee

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Morton, Texas

**Tony D. Williams**  
Executive Vice President  
and Treasurer  
Austin, Texas

May 31, 2012

Ms. Toni Oyler (MC-161)  
TCEQ Office of Air Quality  
P.O. Box 13087  
Austin, TX 78711-3087

✓ X

RE: Wingate Gin Corporation - Grain Elevator  
RN101294155  
Permit 73188

Dear Ms. Oyler:

We have been informed by the Air Permits Division Staff that all permits are required explicitly authorize Startup and Shutdown emissions by January of next year.

The above referenced facility is an agricultural processing operation, and emissions from these operations are typically lower during startup and shutdown than they are during normal operation. For this reason, we believe the permit can be altered to add the standard MSS language typical for this type of operation.

I hope this information is sufficient for your purposes. If you have any questions, or need any additional information, please contact me at (512) 615-1102, or at [kelley@tcga.org](mailto:kelley@tcga.org).

Sincerely,

J. Kelley Green  
Director of Technical Services