Mr. Lee Tiller Manager Smith Gin Cooperative P.O. Box 386 Odem, Texas 78370

Re: Replacement of Pre-Cleaning Machinery and Fans Rabb Road Plant Robstown, Nueces County Account ID No. NE-0107-W

Dear Mr. Tiller:

This is in response to your letter, dated January 29, 2001, concerning the replacement of pre-cleaning machinery and fans at your Rabb Road Plant located in Robstown, Nueces County. After evaluation of the information which you have furnished, we have determined that your project is authorized under 30 Texas Administrative Code (TAC) Section 106.264. We understand that the new equipment functions in the same or similar manner as the old equipment. There are no emissions changes or new emissions points as a result of this charge.

Accordingly, the company have eliminated the suction system, and have replaced a large number of smaller fans with fewer fans moving large volumes. The total horsepower requirements for air movement will be substantially reduced, and the total air volume will be reduced. This permit by rule was authorized by the Texas Natural Resource Conservation Commission (TNRCC) pursuant to 30 TAC Chapter 106. A copy of the permit by rule in effect at the time of this registration is enclosed. You must construct, install, or modify facilities in accordance with the version of the permit by rule in effect when construction, installation or modification actually begins (see 30 TAC §106.4[a][5]). After completion of construction, installation or modification, the facility shall be operated in compliance with the all applicable conditions of the claimed permits by rule and 30 TAC §106.4.

You are reminded that any additional equipment at this site which could emit air contaminants into the atmosphere must be in compliance with all rules and regulations of the Texas Natural Resource Conservation Commission and the U.S. Environmental Protection Agency at all times.

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Re: Replacement of Pre-cleaning Machinery and Fans

Your cooperation in this matter is appreciated. If you have any questions concerning this permit by rule, please call Mr. Miguel Galvan at (361) 825-3420 or write to him at Texas Natural Resource Conservation Commission, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Duncan F. Stewart, P.E., Manager Permit By Rule/General Operating Permits Section Air Permits Division Texas Natural Resource Conservation Commission

DS/MG/ae

Enclosure

cc: Mr. Jim Bowman, Air Program Manager, Corpus Christi

Record No. 78682

Air Permits Division MC-162

MR LEE TILLER
MANAGER
SMITH GIN COOPERATIVE
PO BOX 386
ODEM TX 78370