

Texas Commission on Environmental Quality
INTEROFFICE MEMORANDUM

TO: Office of Chief Clerk **DATE:** January 4, 2024

THRU: Booker Harrison
Senior Attorney
Environmental Law Division

FROM: Contessa N. Gay
Staff Attorney
Environmental Law Division

SUBJECT: Supplemental Backup Document Filed for Consideration of Hearing Requests at Agenda

Applicant: West Gin, LLC
Permit Nos.: 21589
Program: Air
Docket No.: TCEQ Docket No. 2023-0545-AIR

Enclosed please find a copy of the following document for inclusion in the background material for this permit application:

- Compliance History Report for CN605608371, West Gin, LLC and RN101939148, West Gin



Compliance History Report

Compliance History Report for CN605608371, RN101939148, Rating Year 2019 which includes Compliance History (CH) components from September 1, 2014, through August 31, 2019.

Customer, Respondent, or Owner/Operator:	CN605608371, West Gin, LLC	Classification:	NOT APPLICABLE	Rating:	N/A
Regulated Entity:	RN101939148, WEST GIN	Classification:	NOT APPLICABLE	Rating:	N/A
Complexity Points:	N/A	Repeat Violator:	N/A		
CH Group:	12 - Agriculture, Forestry, Fishing, and Hunting				
Location:	1000 W HILL ST BROWNFIELD, TX 79316-3132, TERRY COUNTY				
TCEQ Region:	REGION 02 - LUBBOCK				
ID Number(s):					
AIR NEW SOURCE PERMITS PERMIT 21589	AIR NEW SOURCE PERMITS ACCOUNT NUMBER TD0038H				
Compliance History Period:	September 01, 2014 to August 31, 2019	Rating Year:	2019	Rating Date:	09/01/2019
Date Compliance History Report Prepared:	January 03, 2024				
Agency Decision Requiring Compliance History:	Enforcement				
Component Period Selected:	September 01, 2014 to September 01, 2019				
TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.					
Name:	TCEQ Staff Member		Phone:	(512) 239-1000	

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

Item 1	January 14, 2019	(1538106)
Item 2	February 21, 2019	(1548917)

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

- | | | | | | |
|---|--------------|---|-----------|-----------------|-------|
| 1 | Date: | 02/19/2019 | (1537386) | | |
| | Self Report? | NO | | Classification: | Minor |
| | Citation: | 30 TAC Chapter 116, SubChapter B 116.110(e)
5C THSC Chapter 382 382.085(b) | | | |
| | Description: | Failure to submit a Change of Ownership notice within 30 days of the change in ownership. | | | |

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

Texas Commission on Environmental Quality
INTEROFFICE MEMORANDUM

TO: Office of Chief Clerk **Date:** December 8, 2023
FROM: Contessa N. Gay
Staff Attorney
Environmental Law Division
SUBJECT: Backup Documents Filed for Consideration of Hearing Requests at
Agenda

Applicant: West Gin, LLC
Permit Nos.: 21589
Program: Air
Docket No.: TCEQ Docket No. 2023-0545-AIR

Enclosed please find a copy of the following documents for inclusion in the background material for this permit application:

- The final draft of the permit Special Conditions
- The Emission Sources - Maximum Allowable Emission Rates
- The Compliance History Report
- The Permit Renewal Source Analysis & Technical Review

Special Conditions

Permit Number 21589

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.

Operational Limitations, Work Practices, and Plant Design

2. Emission rates for the cotton gin and trash handling are based on and the facilities shall be limited to an hourly throughput of 20 bales. Annual emission rates are based on 28,000 bales of cotton as well as the following required controls:

Equipment/Fan Exhausts	Controls
Battery Condenser	Small Mesh Screens
2 nd Lint Cleaner Condenser	Small Mesh Screens
All Fan Exhausts	High-Efficiency Cyclones

3. To minimize fugitive emissions, the burr hopper dump area shall be enclosed while loading burr trucks.
4. Prior to leaving the gin property, the beds of all trucks transporting gin trash material shall be covered, and the trucks and dump area shall be cleaned of all over-spill material.
5. Gin plant roads, parking areas, and other traffic areas shall be sprinkled with water, and/or be paved (with a cohesive hard surface) and cleaned as necessary to maintain compliance with all Texas Commission on Environmental Quality (TCEQ) rules and regulations.
6. Emissions of lint and cotton trash shall be minimized by proper maintenance of all buildings and gin equipment. Any accumulations of lint, cotton trash, and/or cotton burrs on the gin property shall be cleaned up and removed from the gin property on a daily basis.

Recordkeeping Requirements

7. Records of annual throughputs for cotton processed shall be maintained at this facility and made available at the request of personnel from the TCEQ or any other air pollution control program having jurisdiction to demonstrate compliance with permit limitations. These records shall be retained for a rolling 24-month period.

Date: DRAFT

Emission Sources - Maximum Allowable Emission Rates

Permit Number 21589

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)
	Precleaning System	PM	10.30	7.21
		PM ₁₀	4.84	3.39
		PM _{2.5}	0.30	0.21
	Burners	PM	0.08	0.09
		PM ₁₀	0.08	0.09
		PM _{2.5}	0.08	0.09
		VOC	0.06	0.06
		NO _x	1.10	1.16
		CO	0.92	0.97
		SO ₂	0.01	0.01
	Trash Hopper	PM	16.30	11.41
		PM ₁₀	6.48	4.54
		PM _{2.5}	0.45	0.32
	Lint System	PM	25.48	17.84
		PM ₁₀	6.74	4.72
		PM _{2.5}	0.36	0.25
	Trash Handling	PM	1.50	1.05
		PM ₁₀	0.52	0.36
		PM _{2.5}	0.03	0.02

(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) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

NO_x - total oxides of nitrogen

SO₂ - sulfur dioxide

PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented

PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented

PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter

Emission Sources - Maximum Allowable Emission Rates

CO - carbon monoxide

(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: _____ DRAFT _____

Compliance History Summary

Company	West Gin LLC	Permit Number	21589
City	Brownfield	Project Number	341784
County	Terry	Regulated Entity Number	RN101939148
Project Type	Renewal	Customer Reference Number	CN605608371
Project Reviewer	Victor Gonzalez		
Site Name	Cotton Gin		

Program Area: **NSR**

Project Received Date: **May 3, 2022**

Rating Date: **9/1/2021**

RN 101939148

Rating:

Classification: N/A

Status:

Repeat Violator:

Complexity Points: 0

CN 605608371

Rating:

Classification: N/A

Status:

Repeat Violator:

:

Date Compliance History Report Prepared: November 22, 2023

Permit Renewal Source Analysis & Technical Review

Company	West Gin LLC	Permit Number	21589
City	Brownfield	Project Number	341784
County	Terry	Regulated Entity Number	RN101939148
Project Type	Renewal	Customer Reference Number	CN605608371
Project Reviewer	Victor Gonzalez	Received Date	May 3, 2022
Site Name	Cotton Gin		

Project Overview

West Gin LLC has requested to renew NSR Permit No 21589 which authorizes a cotton gin located in Brownfield, Terry County. Increases in emissions are a result of updated emission factors.

Emission Summary

Air Contaminant	Current Allowable Emission Rates (tpy)	Proposed Allowable Emission Rates (tpy)	Change in Allowable Emission Rates (tpy)
PM	22.32	37.60	15.28
PM ₁₀	11.84	13.10	1.26
PM _{2.5}	0.00	0.89	0.89*
VOC	0.06	0.06	0.00
NO _x	0.00	1.16	1.16
CO	0.00	0.97	0.97
SO ₂	0.00	0.01	0.01

* Emissions of PM_{2.5} will be added to the Maximum Allowable Emission Rates Table (MAERT) upon issuance of this project. These emissions were previously quantified and authorized as PM or PM₁₀, but were not speciated in the MAERT. These emissions will be speciated, based on current guidance and policy, to demonstrate compliance with current standards for PM, PM₁₀, and PM_{2.5}.

Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	June 20, 2022
Site rating & classification:	N/A
Company rating & classification:	N/A
Has the permit changed on the basis of the compliance history or rating?	No
Did the Regional Office have any comments? If so, explain.	N/A

Public Notice Information

Requirement	Date
Legislator letters mailed	5/12/2022
Date 1 st notice published	6/2/2022
Publication Name: Brownfield News	
Pollutants: PM, PM ₁₀ , PM _{2.5} , VOC, NO _x , CO, and SO ₂	
Date 1 st notice Alternate Language published	No, the company verified that a Bilingual Education Program is not required in the local school district.

Permit Renewal Source Analysis & Technical Review

Permit No. 21589
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Regulated Entity No. RN101939148

Requirement	Date
1 st public notice tearsheet(s) received	6/8/2022
1 st public notice affidavit(s) received	6/8/2022
1 st public notice certification of sign posting/application availability received	7/7/2022

Public Interest

Public Interest Information	
Number of comments received	3
Number of meeting requests received	0
Number of hearing requests received	2
Date meeting held	N/A
Date response to comments filed with OCC	11/02/2022
Date of SOAH hearing	

Renewal Requirements

Requirement	
Date of permit expiration:	11/09/2022
Date written notice of review was mailed:	10/21/2021
Was there a condition of air pollution that had to be addressed during this project review?	No
Permit Renewal Fee: \$	1,707.40

Federal Rules Applicability

Requirement	
Subject to NSPS?	No, NSPS does not apply since the site is not an affected facility under 40 CFR Part 60.
Subject to NESHAP?	No, the site does not emit any air contaminants regulated under 40 CFR Part 61.
Subject to NESHAP (MACT) for source categories?	No, the site is not a listed source category regulated under 40 CFR Part 63.

Title V Applicability

Requirement	
Title V applicability:	N/A, the site is not a major source nor is it an area source subject to Title V.

**Permit Renewal
Source Analysis & Technical Review**

Permit No. 21589
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Regulated Entity No. RN101939148

Requirement

Periodic Monitoring (PM) applicability: **N/A, the site is not a major source nor is it an area source subject to Title V; therefore, it is not subject to Periodic Monitoring.**

Compliance Assurance Monitoring (CAM) applicability: **N/A, the site is not a major source nor is it an area source subject to Title V; therefore, it is not subject to CAM.**

Process Description

West Gin, LLC operates a cotton gin at this site. The facility receives 90% of its seed cotton in modules. The gin is limited to a maximum hourly baling rate of 20 bales per hour and a maximum annual baling rate of 28,000 bales per year. Motes are baled at this facility and the burr hopper is completely enclosed. Three natural gas-fired burners are located at this facility with a combined rating of 11 million British thermal units per hour (MMBtu/hr).

Project Scope

The applicant has requested to renew their permit. Increases in allowable emissions for PM₁₀ and PM_{2.5} are a result of updated emission factors where the averaging methodology used on particle size distribution data was changed. There will be no increase in capacity, production rate, or throughput.


Impacts Evaluation - 30 TAC 116.111(a)(2)(J)

Was modeling conducted? **No*** Type of Modeling: **N/A**

Is the site within 3,000 feet of any school? **No**

Additional site/land use information: Agricultural/residential

* The facility is a seasonal minor source. There are no toxic emissions associated with this facility. The facility emits particulate matter and minor products of combustion. No adverse impacts are expected to occur if the facility operates in accordance with the permit.


Project Reviewer 08/15/2022
Victor Gonzalez Date


Team Leader 08/17/2022
Joe Nicosia Date