NEW ERC FILE REQUEST FORM

Processor Initials: SVT **Today's Date:** 5-6-03
Company Name: UTselia Cooperative Gin
Project#: 1020219 **Yellow** ☑ **Orange** ☐
ERC#'s S-1842-4
Original Facility Number (s): S-516
Year ERC Issued: 2003
Description Original action for installation of 10-30 cyclones replacing 20-20 cyclones

Location: Sec _____ **T** _____ **R** _____
Folder size: **Regular** ☒ **Pocket** ☐
Return file to permit processor: **Yes** ☐ **No** ☒

S-516
1020219

San Joaquin Valley
Air Pollution Control District

RECEIVED
APR 29 2004
SJVAPCD
Southern Region

April 28, 2004

Dan Oster
Assistant Vice President
Farm Credit West
PO Box 4379
Visalia, CA 93278

Re: Visalia Cooperative Gin

Dear Mr. Oster:

The San Joaquin Valley Air Pollution Control District has received your March 31 letter and the attached UCC Amendment identifying Emission Reduction Credit (ERC) certificate S-1842-4 as collateral for a loan approval for Visalia Cooperative Gin.

This letter is to confirm that the certificate identified above is currently valid, and that we have noted in our system that Farm Credit West has registered a lien-holder's interest in the certificate. As such, we will expect any application the District receives from Visalia Coop to transfer the credits to a third party to be accompanied by a written acknowledgement of the transaction from Farm Credit West.

Please inform us as soon as possible of any change in status of this lien, and call me at (559) 230-5900 if you have any questions regarding this matter.

Sincerely,

David Warner
Director of Permit Services

c: Visalia Cooperative Gin
Tom Goff, Permit Services Manager

David L. Crow
Executive Director/Air Pollution Control Officer

Northern Region Office
4230 Kiernan Avenue, Suite 130
Modesto, CA 95356-9322
(209) 557-6400 • FAX (209) 557-6475

Central Region Office
1990 East Gettysburg Avenue
Fresno, CA 93726-0244
(559) 230-6000 • FAX (559) 230-6061

Southern Region Office
2700 M Street, Suite 275
Bakersfield, CA 93301-2373
(661) 326-6900 • FAX (661) 326-6985

www.valleyair.org

Farm Credit West

Visalia Office
3010 W. Main St., P.O. Box 4379
Visalia, California 93278
559.732.4501 FAX: 559.732.2958
Web: www.farmcreditwest.com

March 31, 2004

Dave Warner
San Joaquin Valley
Air Pollution Control District
1990 East Gettysburg Ave.
Fresno, CA. 93726

RE: Visalia Cooperative Gin

Dave.

Visalia Cooperative Gin (VCG) applied for and has received approval for a loan from Farm Credit West, PCA. As a condition of this loan VCG will be pledging as collateral their Emission Reduction Credit Certificate S-1842-4.

Farm Credit West will take physical possession of the certificate when the loan is booked and will return the certificate to VCG when the loan is paid in full. Additionally the certificate will be described within our security documentation and acknowledged by VCG. It is not our intent to limit VCG's ability to market this certificate, only to have recognition by the Air Pollution Control District that this asset is pledged as collateral for our loan.

Please provide us an acknowledgment that the SJVAPCD recognizes our lien position on this certificate. I have enclosed a copy of the certificate as well as the UCC filing that is used to record our security interest. If you need anything else please feel free to give me a call.

Thanks for your help in this transaction.

Sincerely,

Dan Oster
Assistant Vice President

UCC FINANCING STATEMENT AMENDMENT

FOLLOW INSTRUCTIONS (front and back) CAREFULLY

A. NAME & PHONE OF CONTACT AT FILER [optional]
Vivian Taylor (559) 732-4501

B. SEND ACKNOWLEDGMENT TO: (Name and Address)
Farm Credit West, PCA
Visalia Office
P. O. Box 4379
Visalia, CA 93278

THE ABOVE SPACE IS FOR FILING OFFICE USE ONLY

1a. INITIAL FINANCING STATEMENT FILE #
0228460656 (filed 10/10/2002)

1b. ☐ This FINANCING STATEMENT AMENDMENT is to be filed [for record] (or recorded) in the REAL ESTATE RECORDS

2. ☐ TERMINATION: Effectiveness of the Financing Statement identified above is terminated with respect to security interest(s) of the Secured Party authorizing this Termination Statement

3. ☐ CONTINUATION: Effectiveness of the Financing Statement identified above with respect to security interest(s) of the Secured Party authorizing this Continuation Statement is continued for the additional period provided by applicable law

4. ☐ ASSIGNMENT (full or partial): Give name of assignee in item 7a or 7b and address of assignee in item 7c, and also give name of assignor in item 9

5. AMENDMENT (PARTY INFORMATION): This Amendment affects ☐ Debtor or ☐ Secured Party of record. Check only one of these boxes.
Also check one of the following three boxes and provide appropriate information in items 6 and/or 7

☐ CHANGE name and/or address: Give current record name in item 6a or 6b; also give new name (if name change) in item 7a or 7b and/or new address (if address change) in item 7c

☐ DELETE name: Give record name to be deleted in item 6a or 6b

☐ ADD name: Complete item 7a or 7b, and also item 7c; also complete items 7d-7g (if applicable)

6. CURRENT RECORD INFORMATION

6a. ORGANIZATION'S NAME

OR

6b. INDIVIDUAL'S LAST NAME	FIRST NAME	MIDDLE NAME	SUFFIX

7. CHANGED (NEW) OR ADDED INFORMATION

7a. ORGANIZATION'S NAME

OR

7b. INDIVIDUAL'S LAST NAME	FIRST NAME	MIDDLE NAME	SUFFIX

7c. MAILING ADDRESS	CITY	STATE	POSTAL CODE	COUNTRY

7d. SEE INSTRUCTIONS	ADD'L INFO RE ORGANIZATION DEBTOR	7e. TYPE OF ORGANIZATION	7f. JURISDICTION OF ORGANIZATION	7g. ORGANIZATIONAL ID #, if any
				☒ NONE

8. AMENDMENT (COLLATERAL CHANGE): check only one box

Describe collateral ☐ deleted or ☒ added, or give entire ☐ restated collateral description, or describe collateral ☐ assigned.

All of the following described Collateral:

All rights, title, and interest in that certain Emission Reduction Credit Certificate, issued by San Joaquin Valley Air Pollution Control District, identified as S-1842-4, and issued to Visalia Coop Cotton Gin, for the reduction of particulate matter (PM-10) at the following locations: Road 132 and Avenue 336, Visalia, CA 93279.

9. NAME OF SECURED PARTY OF RECORD AUTHORIZING THIS AMENDMENT (name of assignor, if this is an Assignment). If this is an Amendment authorized by a Debtor which adds collateral or adds the authorizing Debtor, or if this is a Termination authorized by a Debtor, check here ☐ and enter name of DEBTOR authorizing this Amendment

9a. ORGANIZATION'S NAME
Visalia Cooperative Cotton Gin

OR

9b. INDIVIDUAL'S LAST NAME	FIRST NAME	MIDDLE NAME	SUFFIX

10. OPTIONAL FILER REFERENCE DATA
Visalia Cooperative Cotton Gin/Customer No. 0673019146 March 24, 2004

ACKNOWLEDGEMENT COPY - NATIONAL UCC FINANCING STATEMENT AMENDMENT (FORM UCC3)(REV. 05/22/02)

San Joaquin Valley
Air Pollution Control District

Southern Regional Office • 2700 M Street, Suite 275 • Bakersfield, CA 93301-2370

Emission Reduction Credit Certificate
S-1842-4

ISSUED TO: VISALIA COOP COTTON GIN

ISSUED DATE: April 28, 2003

LOCATION OF REDUCTION: ROAD 132 & AVENUE 336
VISALIA, CA 93279

For PM10 Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	350 lbs	17,130 lbs

[ ] Conditions Attached

Method Of Reduction

[ ] Shutdown of Entire Stationary Source
[ ] Shutdown of Emissions Units
[X] Other

Replacement of 2D-2D cyclones with 1D-3D cyclones and reduction in annual production limit, permit #S-516-1

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

David L. Crow, Executive Director / APCO

Seyed Sadredin, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Southern Regional Office • 2700 M Street, Suite 275 • Bakersfield, CA 93301-2370

Emission Reduction Credit Certificate
S-1842-4

ISSUED TO: VISALIA COOP COTTON GIN

ISSUED DATE: April 28, 2003

LOCATION OF REDUCTION: ROAD 132 & AVENUE 336
VISALIA, CA 93279

For PM10 Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	350 lbs	17,130 lbs

[ ] Conditions Attached

Method Of Reduction

[ ] Shutdown of Entire Stationary Source
[ ] Shutdown of Emissions Units
[X] Other

Replacement of 2D-2D cyclones with 1D-3D cyclones and reduction in annual production limit, permit #S-516-1

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David L. Crow, Executive Director / APCO

Seyed Sadredin, Director of Permit Services

Apr 28 2003 11:23AM – SARGENTL

VISALIA TIMES-DELTA
www.VisaliaTimesDelta.com
Tulare Advance-Register
www.TulareAdvanceRegister.com

RECEIVED
MAY 8 2003
BY:

RECEIVED
MAY 0 7 2003
ADMIN.SERVICES
SJVUAPCD

S.J.V.U.A.P.C.D.
1990 E. Gettysburg Ave.
Fresno, Ca. 93726

Steve Tomlin

Ad Number: 06517512

In the Superior Court of the State of California in and for the County of Tulare

Certificate of Publication

STATE OF CALIFORNIA ss.
COUNTY OF TULARE

I, Renee Muller am over the age of 18 years old, citizen of the United States and not a party to, or have an interest in this matter, hereby certify that the Visalia Times Delta is a newspaper of general circulation within the provisions of the Government Code of the State of California, adjudicated a newspaper of general circulation on April 22, 1929 by Superior Court order no. 20576 as entered in book 35 page 85 of said court, printed and published in the City of Visalia, County of Tulare, State of California, and that I am the principal clerk of the printer of said newspaper. I also certify that the

Notice Of Final Action

copy of which is annexed on the margin hereof, is a true printed copy as published in said newspaper on the following date(s):

May 5, 2003

I certify under penalty of perjury that the foregoing is true and correct. Executed in Visalia, California, on May 6, 2003

Renee Muller

Renee Muller

NOTICE OF FINAL ACTION FOR THE ISSUANCE OF EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Visalia Cooperative Cotton Gin for emission reductions generated by installation of more efficient control equipment at Road 132 and Avenue 336 near Visalia, California. The quantity of ERCs to be issued is 17,480 pounds of particulate matter less than 10 microns (PM10).

All comments received following the District's preliminary decision on this project were considered.

Comments received by the District during the public notice period resulted in clarification of the approximate fractions of trash, moisture, lint, and seed in field cotton. These changes were minor and did not affect the basis for issuance of the above referenced ERCs.

The application reviewer for Project #S-1020219 is available for public inspection at the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 2700 M STREET, SUITE 275, BAKERSFIELD, CALIFORNIA 93301.
Publish: May 5, 2003
Ad#06517512

SVT

San Joaquin Valley
Air Pollution Control District

CERTIFIED MAIL

APR 3 0 2003

Mr. Larry Gallian
Visalia Cooperative Cotton Gin
P.O. Box 1208
Visalia, CA 93279

RE: Notice of Final Action - Emission Reduction Credits
Project Number: S-1020219

Dear Mr. Gallian:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Visalia Cooperative Cotton Gin for emission reduction generated by installation of more efficient control equipment, at Road 132 and Avenue 336 near Visalia, California. The quantity of ERCs to be issued is 17,480 pounds of particulate matter less than 10 microns (PM10).

Enclosed are the ERC Certificate(s) and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the ERC Certificate(s) was published on March 17, 2003. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on March 11, 2003. All comments received following the District's preliminary decision on this project were considered.

Comments received by the District during the public notice period resulted in clarification of the approximate fractions of trash, moisture, lint, and seed in field cotton. These changes were minor and did not affect the basis for issuance of the above referenced ERCs. Enclosed are revised pages of the application review.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 30 days.

David L. Crow
Executive Director/Air Pollution Control Officer

Northern Region Office
4230 Kiernan Avenue, Suite 130
Modesto, CA 95356-9322
(209) 557-6400 • FAX (209) 557-6475

Central Region Office
1990 East Gettysburg Avenue
Fresno, CA 93726-0244
(559) 230-6000 • FAX (559) 230-6061

Southern Region Office
2700 M Street, Suite 275
Bakersfield, CA 93301-2373
(661) 326-6900 • FAX (661) 326-6985

www.valleyair.org

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Thomas Goff at (661) 326-6900.

Sincerely,

Seyed Sadredin
Director of Permit Services

SS: SVT/ls

Enclosures
c: Thomas Goff, Permit Services Manager

San Joaquin Valley
Air Pollution Control District

APR 3 0 2003

Gerardo C. Rios (AIR 3)
Chief, Permits Office
Air Division
U.S. E.P.A. - Region IX
75 Hawthorne Street
San Francisco, CA 94105

RE: Notice of Final Action - Emission Reduction Credits
Project Number: S-1020219

Dear Mr. Rios:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Visalia Cooperative Cotton Gin for emission reduction generated by installation of more efficient control equipment, at Road 132 and Avenue 336 near Visalia, California. The quantity of ERCs to be issued is 17,480 pounds of particulate matter less than 10 microns (PM10).

Enclosed is a copy of the ERC Certificate(s) and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the ERC Certificate(s) was published on March 17, 2003. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on March 11, 2003. All comments received following the District's preliminary decision on this project were considered.

Comments received by the District during the public notice period resulted in clarification of the approximate fractions of trash, moisture, lint, and seed in field cotton. These changes were minor and did not affect the basis for issuance of the above referenced ERCs. Enclosed are revised pages of the application review.

David L. Crow
Executive Director/Air Pollution Control Officer

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Modesto, CA 95356-9322
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Bakersfield, CA 93301-2373
(661) 326-6900 • FAX (661) 326-6985

www.valleyair.org

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Thomas Goff at (661) 326-6900.

Sincerely,

Seyed Sadredin
Director of Permit Services

SS: SVT/ls

Enclosures
c: Thomas Goff, Permit Services Manager

San Joaquin Valley
Air Pollution Control District

APR 3 0 2003

Mike Tollstrup, Chief
Project Assessment Branch
Stationary Source Division
California Air Resources Board
PO Box 2815
Sacramento, CA 95812-2815

RE: Notice of Final Action - Emission Reduction Credits
Project Number: S-1020219

Dear Mr. Tollstrup:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Visalia Cooperative Cotton Gin for emission reduction generated by installation of more efficient control equipment, at Road 132 and Avenue 336 near Visalia, California. The quantity of ERCs to be issued is 17,480 pounds of particulate matter less than 10 microns (PM10).

Enclosed is a copy of the ERC Certificate(s) and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the ERC Certificate(s) was published on March 17, 2003. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on March 11, 2003. All comments received following the District's preliminary decision on this project were considered.

Comments received by the District during the public notice period resulted in clarification of the approximate fractions of trash, moisture, lint, and seed in field cotton. These changes were minor and did not affect the basis for issuance of the above referenced ERCs. Enclosed are revised pages of the application review.

David L. Crow
Executive Director/Air Pollution Control Officer

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4230 Kiernan Avenue, Suite 130
Modesto, CA 95356-9322
(209) 557-6400 • FAX (209) 557-6475

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1990 East Gettysburg Avenue
Fresno, CA 93726-0244
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2700 M Street, Suite 275
Bakersfield, CA 93301-2373
(661) 326-6900 • FAX (661) 326-6985

www.valleyair.org

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Thomas Goff at (661) 326-6900.

Sincerely,

Seyed Sadredin
Director of Permit Services

SS: SVT/ls

Enclosures
c: Thomas Goff, Permit Services Manager

NOTICE OF FINAL ACTION
FOR THE ISSUANCE OF
EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Visalia Cooperative Cotton Gin for emission reductions generated by installation of more efficient control equipment, at Road 132 and Avenue 336 near Visalia, California. The quantity of ERCs to be issued is 17,480 pounds of particulate matter less than 10 microns (PM10).

All comments received following the District's preliminary decision on this project were considered.

Comments received by the District during the public notice period resulted in clarification of the approximate fractions of trash, moisture, lint, and seed in field cotton. These changes were minor and did not affect the basis for issuance of the above referenced ERCs.

The application review for Project #S-1020219 is available for public inspection at the **SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 2700 M STREET, SUITE 275, BAKERSFIELD, CALIFORNIA 93301.**

A. Quantifiable

The AERs were calculated using District recognized emission factors based on source testing of cotton gins in the San Joaquin Valley and actual historical production data. Therefore, the reductions are quantifiable.

B. Permanent

The replacement of screen baskets and 2D2D cyclones with a plenum chamber and 1D3D cyclones is a permanent modification to the cotton gin. Because the emission reductions result from addition of control equipment and not from shutdown of equipment, historical actual emissions from this cotton gin will not be shifted to another cotton gin. Therefore, the reductions are permanent.

C. Surplus

The replacement of screen baskets and 2D2D cyclones with a plenum chamber and 1D3D cyclones was voluntary. The resulting emission reductions are not mandated by any law, rule, regulation, agreement, or order of the District, State, or Federal Government. The reductions are not attributed to a control measure noticed for workshop or proposed, nor contained in a State Implementation Plan. Therefore, the reductions are surplus.

To determine whether the reductions were surplus with respect to Rule 4202 (Particulate Matter – Emission Rate), actual emission rates will be compared to limits in the rule. The process rate in a cotton gin varies from emission point to emission point as the trash and seeds are removed from the lint, decreasing the weight. The rate starts at 1,500 lb of seed cotton per bale of finished cotton and drops to about 500 lb of lint cotton per bale of finished cotton. Approximately 750 lb of seed is removed per bale, and approximately 150 lb of trash is removed per bale, with remaining 100 lb removed as moisture, lint and motes through the finishing stages.

The lowest pre-modification process weight rate at the #1 Lint Cleaner is approximately:

$E = 3.59*P^{0.62}$ where:

P= process weight in tons/hr =
= (600 bales/day) x [(1500 lb/bale - 750 lb(seed)/bale – 150lb (trash)/bale)] x 1 ton/2,000 lb / (24 hr/day)
= 7.5 tph

$E = 3.59(7.5^{0.62}) = 12.5$ lb PM/hr

The highest emitting pre-modification source operation is the #1 Lint Cleaner (after seed and trash are removed). Emissions are 0.41 lb PM10/bale times 600 bales per day dividing by 24 hours per day yields 10.3 lb PM10/hr. All other source operations emit less. Therefore, compliance with this rule pre-modification is validated.

The lowest post-modification process rate weight for source operations discharging to the plenum is the #2 Precleaning Operation (only trash removed at this point).

P= process weight in tons/hr =
= (600 bales/day) x [(1500 lb/bale - 150lb(trash)/bale)] x 1 ton/2,000 lb / (24 hr/day)
= 16.9 tph

$E = 3.59(16.9^{0.62}) = 20.7$ lb PM/hr

The highest emitting post-modification source operation is the plenum chamber. Emissions are 0.48 lb PM10/bale times 600 bales per day dividing by 24 hours per day yields 12.0 lb PM10/hr. All other post-modification source operations emit less. Therefore, compliance with rule post-modification is also validated.

D. Timeliness

On October 6, 2001, the cotton gin commenced operation with the new control equipment installed. The application for ERC was received by the District on March 20, 2002, within 180 days of the October 6, 2001. Pursuant to Rule 2301, Section 4.2.3, an application for ERC must be filed no later than 180 days after the emission reductions have occurred. Because the ERC application was filed no later than 180 days after the commencing date, the application is timely.

San Joaquin Valley
Unified Air Pollution
Control District

Due Date	Amount Due
5/28/2003	$ 250.00

Amount Enclosed

ERCFEE
516 S43799 4/28/2003

RETURN THIS TOP PORTION ONLY, WITH REMITTANCE TO:

VISALIA COOP COTTON GIN
P O BOX 1208
VISALIA, CA 93279

SJVAPCD
2700 M Street, Suite 275
Bakersfield, CA 93301-2370

Thank You!

San Joaquin Valley
Unified Air Pollution
Control District

SJVAPCD Tax ID: 77-0262563

Facility ID	Invoice Date	Invoice Number
S516	4/28/2003	S43799

Invoice Type
Project: S1020219

VISALIA COOP COTTON GIN
ROAD 132 & AVENUE 336
VISALIA, CA 93279

PROJECT NUMBER: 1020219

APPLICATION FILING FEES	$ 650.00
ENGINEERING TIME FEES	$ 250.00
TOTAL FEES	$ 900.00
LESS PREVIOUSLY PAID PROJECT FEES APPLIED TO THIS INVOICE	($ 650.00)
PROJECT FEES DUE (Enclosed is a detailed statement outlining the fees for each item.)	**$ 250.00**

San Joaquin Valley Air Pollution Control District

Invoice Detail

Facility ID: S516

VISALIA COOP COTTON GIN
ROAD 132 & AVENUE 336
VISALIA, CA 93279

Invoice Nbr: S43799
Invoice Date: 4/28/2003
Page: 1

Application Filing Fees

Project Nbr	Permit Number	Description	Application Fee
S1020219	S-516-1020219-0	Emission Reduction Credit Banking Evaluation Fee	$ 650.00
		Total Application Filing Fees:	**$ 650.00**

Engineering Time Fees

Project Nbr	Quantity	Rate	Description	Fee
S1020219	15 hours	$ 60.00/h	Standard Engineering Time	$ 900.00
			Less Credit For Application Filing Fees	($ 650.00)
			Standard Engineering Time SubTotal	$ 250.00
			Total Engineering Time Fees:	**$ 250.00**

San Joaquin Valley Air Pollution Control District

Account Summary

Facility ID: S516

VISALIA COOP COTTON GIN
ROAD 132 & AVENUE 336
VISALIA, CA 93279

Statement Date: 4/28/2003

Invoice Date	Invoice Number	Invoice Due Date	Description of Fees	Amount Due
12/12/2002	S41941	1/11/2003	Project: S1020989	$ 660.92
4/28/2003	S43799	5/28/2003	Project: S1020219	$ 250.00
			Total Outstanding Balance:	**$ 910.92**

Telephone Conversation

With: Shaheerah Fateen, EPA Region 9, (415) 947-4156

APCD Rep: Steve Tomlin

Date/Time: 04/25/03

Re: EPA Review of Project

SF returned the message I left with Ed Pike. She stated that she did not get a chance to review that project and asked for the public notice closing date. I told here the date was 4/16, last week. She said EPA has no comments then.

Telephone Conversation

With: Ed Pike, EPA, 415-972-3970

APCD Rep: Steve Tomlin

Date/Time: 4/24/2003

Re: EPA Review of ERC Project

Left message stating that notice period was over (ended on 4/16) and asked if he had mailed any comments in that may not have reached me.

Telephone Conversation

With: Norm Marquis, ARB 916-324-6201

APCD Rep: Steve Tomlin

Date/Time: 4/24/2003

Re: ARB Review of ERC Project

NM - no comments on project.

Telephone Conversation

With: Roger Isom, Cal Cotton Ginners Assoc for Visalia Coope Gin

APCD Rep: Steve Tomlin

Date/Time: 03/20/03

Re: Comments on Application Review

RI called with one minor comment on the application review. He referred to the Compliance section for Rule 4202 and stated that approximate portions of a bale of cotton are as follows: 750 lb seed (rather than 500), 150 lb trash (rather than 400), and the final 100 lb of lint and motes includes moisture as well. Other than that clarification, no comments.

VISALIA TIMES-DELTA
www.VisaliaTimesDelta.com
Tulare Advance-Register
www.TulareAdvanceRegister.com

RECEIVED
MAR 19 2003

S.J.V.U.A.P.C.D.
1990 E. GETTYSBURG AVE.
FRESNO, CA. 93726

Steve Tonelli

Ad Number: 06517270

In the Superior Court of the State of California in and for the County of Tulare

Certificate of Publication

STATE OF CALIFORNIA ss.
COUNTY OF TULARE

I, RENEE MULLER am over the age of 18 years old, citizen of the United States and not a party to, or have an interest in this matter, hereby certify that the VISALIA TIMES DELTA is a newspaper of general circulation within the provisions of the Government Code of the State of California, adjudicated a newspaper of general circulation on April 22, 1929 by Superior Court order no., 20576 as entered in book 35 page 85 of said court, printed and published in the City of Visalia, County of Tulare, State of California, and that I am the principal clerk of the printer of said newspaper. I also certify that the

NOTICE OF PRELIMINARY DECISION

copy of which is annexed on the margin hereof, is a true printed copy as published in said newspaper on the following date(s):

MARCH 17, 2003

I certify under penalty of perjury that the foregoing is true and correct. Executed in Visalia, California, on MARCH 18, 2003

Renee Muller
RENEE MULLER

NOTICE OF PRELIMINARY DECISION FOR THE PROPOSED ISSUANCE OF EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits (ERC's) to Visalia Cooperative Cotton Gin for the installation of more efficient emission control equipment, located at Road 132 and Avenue 336 near Visalia, California. The quantity of ERC's proposed for banking is 17,480 pounds of particulate matter less than 10 microns (PM10).

The analysis of the regulatory basis for this proposed action, Project #S-1020218, is available for public inspection at the District office at the address below. Written comments on this project must be submitted within 30 days of the publication date of this notice to SEYED SADREDIN, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 2700 M STREET, SUITE 275, BAKERSFIELD, CALIFORNIA 93301.
Publish: March 17, 2003
Ad#06517270

San Joaquin Valley
Air Pollution Control District

RECEIVED
MAR 12 2003
SAN JOAQUIN VALLEY UNIFIED
APCD-SOUTHERN REGION

MAR 11 2003

Mr. Larry Gallian, Manager
Visalia Cooperative Cotton Gin
P.O. Box 1208
Visalia, CA 93279

RE: Notice of Preliminary Decision - Emission Reduction Credits
Project #S-1020219

Dear Mr. Gallian:

Enclosed for your review and comment is the District's analysis of Visalia Cooperative Cotton Gin's request for Emission Reduction Credits (ERC's) resulting from the installation of more efficient emission control equipment, located at Road 132 and Avenue 336 near Visalia, California. The quantity of ERC's proposed for banking is 17,480 pounds of particulate matter less than 10 microns (PM10).

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day public comment period that begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. Should you have any questions, please contact Steve Tomlin of Permit Services at (661) 326-6968.

Sincerely,

Seyed Sadredin
Director of Permit Services

SS: SVT/ls
Enclosure
c: Thomas Goff, Permit Services Manager

San Joaquin Valley
Air Pollution Control District

MAR 1 1 2003

Mike Tollstrup, Chief
Project Assessment Branch
Stationary Source Division
California Air Resources Board
PO Box 2815
Sacramento, CA 95812-2815

RE: Notice of Preliminary Decision - Emission Reduction Credits
Project #S-1020219

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Visalia Cooperative Cotton Gin's request for Emission Reduction Credits (ERC's) resulting from the installation of more efficient emission control equipment, located at Road 132 and Avenue 336 near Visalia, California. The quantity of ERC's proposed for banking is 17,480 pounds of particulate matter less than 10 microns (PM10).

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Sincerely,

Seyed Sadredin
Director of Permit Services

SS: SVT/ls
Enclosure
c: Thomas Goff, Permit Services Manager

David L. Crow
Executive Director/Air Pollution Control Officer

Northern Region Office
4230 Kiernan Avenue, Suite 130
Modesto, CA 95356-9322
(209) 557-6400 • FAX (209) 557-6475

Central Region Office
1990 East Gettysburg Avenue
Fresno, CA 93726-0244
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Southern Region Office
2700 M Street, Suite 275
Bakersfield, CA 93301-2373
(661) 326-6900 • FAX (661) 326-6985

www.valleyair.org

San Joaquin Valley
Air Pollution Control District

MAR 1 1 2003

Gerardo C. Rios (AIR 3)
Acting Chief, Permits Office
Air Division
U.S. E.P.A. - Region IX
75 Hawthorne Street
San Francisco, CA 94105

RE: Notice of Preliminary Decision - Emission Reduction Credits
Project #S-1020219

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of Visalia Cooperative Cotton Gin's request for Emission Reduction Credits (ERC's) resulting from the installation of more efficient emission control equipment, located at Road 132 and Avenue 336 near Visalia, California. The quantity of ERC's proposed for banking is 17,480 pounds of particulate matter less than 10 microns (PM10).

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day public comment period that begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. Should you have any questions, please contact Steve Tomlin of Permit Services at (661) 326-6968.

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Director of Permit Services

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c: Thomas Goff, Permit Services Manager

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VISALIA DELTA TIMES NEWSPAPER

NOTICE OF PRELIMINARY DECISION FOR THE PROPOSED ISSUANCE OF EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits (ERC's) to Visalia Cooperative Cotton Gin for the installation of more efficient emission control equipment, located at Road 132 and Avenue 336 near Visalia, California. The quantity of ERC's proposed for banking is 17,480 pounds of particulate matter less than 10 microns (PM10).

The analysis of the regulatory basis for this proposed action, Project #S-1020219, is available for public inspection at the District office at the address below. Written comments on this project must be submitted within 30 days of the publication date of this notice to **SEYED SADREDIN, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 2700 M STREET, SUITE 275, BAKERSFIELD, CALIFORNIA 93301.**

APPLICATION REVIEW
EMISSION REDUCTION CREDIT BANKING

Facility Name:	Visalia Cooperative Cotton Gin
Mailing Address:	P.O. Box 1208 Visalia, CA 93279
Contact Name:	Larry Gallian, Manager
Telephone:	(559) 732-1365
Engineer:	Steve Tomlin, Senior Air Quality Engineer
Date:	February 3, 2003
Lead Engineer:	Leonard Scandura, Supervising AQE
Date:	February 10, 2003
Facility:	S-516
Permit Numbers:	S-516-1
ERC Certificate #s:	S-1842-4
Date Received:	March 20, 2002
Date Complete:	July 31, 2002

I. SUMMARY

Visalia Cooperative Cotton Gin (Visalia Coop) has applied for Emission Reduction Credits (ERCs) for the replacement of all 2D-2D cyclones with 1D-3D cyclones and installation of a plenum chamber serving 10 of the new cyclones.

The following emission reductions have been found to qualify for banking:

	Total Creditable Reductions Qualified for Banking (lb)
PM10	**17,480 lb**

II. APPLICABLE RULES

Rule 2201 New and Modified Stationary Source Review Rule (April 25, 2002)

Rule 2301 Emission Reduction Credit Banking (December 17, 1992)

III. PROJECT LOCATION

The Visalia Cooperative Cotton Gin is located near the intersection of Road 132 and Avenue 336 near Visalia California.

IV. METHOD OF GENERATING REDUCTIONS

Visalia Coop has applied for Emission Reduction Credits (ERCs) for the replacement of all 2D-2D cyclones with 1D-3D cyclones and installation of a plenum chamber serving 10 of the new cyclones.

This gin is a saw type gin receiving seed cotton through a telescope suction unloading system. The seed cotton is then sent to the precleaning system for the removal of gin trash. Next, the seed cotton is sent to the saw gin stands for removal of the lint cotton from the seed. The lint cotton is then sent to the press to be baled.

Major Cotton Ginning Equipment

One telescope suction unloading system
Two 5 MMBtu/hr tower dryers
Two incline cleaners
One stick machine
One overflow separator
Five saw gin stands and feeders
Ten lint cleaners
One battery condenser
One lint slide
One bale press
One sampler unit
One mote cleaner
One mote press
One 2 MMBtu/hr humidifier unit

Pre-Modification Air Pollution Control Equipment (PTO S-516-1-1)

Operation Serving	Quantity	Size	Control Equipment Type
Unloading (Telescope)	4	38"	2D2D Cyclone
	1	46"	2D2D Cyclone
#1 dryer/cleaner	6	36"	2D2D Cyclone
#2 dryer/cleaner	3	36"	2D2D Cyclone
	3	38"	2D2D Cyclone
Gin stand/feeder trash	2	36"	2D2D Cyclone
Overflow system	2	36"	2D2D Cyclone
Lint cleaner	1		Screen House
Lint trash/robber	1	46"	2D2D Cyclone
Mote system	1	60"	2D2D Cyclone
	1	48"	2D2D Cyclone
	1	28"	2D2D Cyclone
Mote cleaner trash system	1	28"	2D2D Cyclone
Battery condenser	3	72"	1D3D Cyclone

Post-Modification Air Pollution Control Equipment (PTO S-516-1-4)

Operation Serving	Quantity	Size	Control Equipment Type
Unloading (Telescope), #1 dryer/cleaner, #2 dryer/cleaner, overflow system	10	48"	1D3D Cyclone
Gin stand/feeder trash, lint cleaner, lint trash/robber	5	72"	1D3D Cyclone
Mote system	2	54"	1D3D Cyclone
	1	36"	1D3D Cyclone
Battery condenser	3	72"	1D3D Cyclone

Equipment description and conditions for the subject permits are included in Appendix A.

V. CALCULATIONS

A. Assumptions and Emission factors

Except as specified in the tables below, the pre-project and post-project emission factors are from "Cotton Gin Emission Factor Handbook," California Cotton Ginners Association (CCGA), June 2000 for saw gin type. The pre-project total emission factor is 1.83 lb PM10/bale. The post-project total emission factor is 0.77 lb PM10/bale. Copies of the tables used from CCGA handbook are included in Appendix B.

Pre-Modification Emission Factors (established in Project 1010168)

System	Control	Average Emission Factor	
Unloading	2D2D	0.21	lb PM_{10}/bale
#1 Precleaning	2D2D	0.29	lb PM_{10}/bale
#2 Precleaning	2D2D	0.21	lb PM_{10}/bale
Overflow	2D2D	0.04	lb PM_{10}/bale
Gin Stand/Feeder Trash	2D2D	0.04	lb PM_{10}/bale
Lint Cleaning	Screen House	0.41*	lb PM_{10}/bale
Lint Trash/Robber	2D2D	0.24	lb PM_{10}/bale
Motes	2D2D	0.25	lb PM_{10}/bale
Motes Cleaner Trash	2D2D	0.02	lb PM_{10}/bale
Battery Condenser	1D3D	0.03	lb PM_{10}/bale
Stockpiler	2D2D	0.09	lb PM_{10}/bale
Total average emission Factor		**1.83**	**lb PM_{10}/bale**

* Applicant factor, conservative for a pre-project factor from an ERC banking perspective as it is lower than standard CCGA factor of 0.78 lb PM_{10}/bale

Post-Modification Emission Factors

System	Control	Proposed Emission Factor	
Unloading	1D3D	0.48	lb PM_{10}/bale
#1 Precleaning	1D3D		lb PM_{10}/bale
#2 Precleaning	1D3D		lb PM_{10}/bale
Overflow	1D3D		lb PM_{10}/bale
Gin Stand/Feeder Trash	1D3D	0.17	lb PM_{10}/bale
Lint Cleaning	1D3D		lb PM_{10}/bale
Lint Trash/Robber	1D3D		lb PM_{10}/bale
Motes	1D3D	0.07	lb PM_{10}/bale
Motes Cleaner Trash	1D3D	0.02	lb PM_{10}/bale
Battery Condenser	1D3D	0.03	lb PM_{10}/bale
Total Proposed Emission Factor		**0.77**	**lb PM_{10}/bale**

Visalia Coop Gin is a seasonal source, typically operating September through December. Rule 2201 defines a seasonal source as a stationary source with more than 90% of its annual emissions occurring within a consecutive 120-day period. During the baseline period (see below) 98% of Visalia Coop Gin's annual emissions occurred during the period October 1 through December 31 (92 days). Therefore, Visalia Coop Gin is a seasonal source.

Actual Emission Reductions (AER) from a seasonal source are determined for the season only. In order to fit the AER into standard quarterly format of the District's ERC's, the AER will be allocated on a calendar quarter basis using the fraction of the historical emissions occurring during each quarter.

B. Baseline Period Determination and Data

Visalia Coop Cotton Gin received Authority to Construct (ATC) S-516-1-2 on April 26, 2001 to replace screen baskets and thirty 2D2D cyclones with a plenum chamber and twenty-one 1D3D cyclones. The date the facility first operated with the new control equipment was October 6, 2001.

After replacing the air pollution control equipment, Visalia Coop Cotton Gin performed a compliance source test on representative cyclones serving three systems: lint cleaner, plenum, and motes system. The lint cleaner and motes systems source tested at below permit limits. However, source tests results indicated PM10 emissions from the plenum cyclones exceeded the permit limit. Source test values were 0.741 lb/bale, as compared to the ATC permit limit of 0.34 lb/bale. Visalia Coop indicates some plugging of the cyclones occurred during the season, and this produced the higher emission rate. Visalia Coop then submitted an application and received ATC S-516-1-3 on August 21, 2002 to raise the emission limit for the plenum chamber from 0.34 lb/bale to the source test level of 0.741 lb/bale. Since compliance with this new ATC had been established using the previously performed source test, the ATC was implemented and converted into a Permit to Operate on September 10, 2002.

Visalia Coop submitted another application and received ATC S-516-1-4 on December 12, 2002 to lower the plenum chamber emission factor to 0.48 lb/bale, and reduce the annual production limit from 72,000 bales to 25,000 bales. Visalia Coop believed that the lower plenum limit of 0.48 lb/bale could be met since the plugging problems discovered at the end of the last season were resolved. The reduction in annual production limit to 25,000 bales as proposed to allow more emission reductions to qualify for banking. Visalia Coop performed a source test on October 16, 2002 and documented compliance with lower emission rate. The ATC was converted into a Permit to Operate on January 30, 2003.

To establish the appropriate baseline period to be used in determining the emissions reduction resulting from the replacement of air pollution control equipment, pursuant to Rule 2201 subsection 3.7.1, seasonal production data will be analyzed for the two consecutive years of operation immediately prior to the submission of the complete application. The replacement of air pollution control equipment was constructed under ATC S-516-1-2, which was deemed complete on April 12, 2001. The production data for the two consecutive years of operation immediately prior to the submission of the complete application is summarized in the following table.

	No. of 500 lb standard bales ginned
Year	
1999	17,193
2000	25,071

C. Historical Actual Emissions

The historical production data is multiplied by the pre-project permit limit of 1.83 lb PM10/bale to obtain the Historical Actual Emissions (HAE).

	Historical Actual Emissions
1999 PM10	17,193 x 1.83 = 31,463 lb
2000 PM10	25,071 x 1.83 = 45,880 lb
Average Emissions	**38,672 lb**

D. Actual Emission Reductions (AER)

AER = HAE - PE

	Actual Emission Reductions (AER)
HAE	38,672 lb
PE	19,250 lb
AER	**19,422 lb**

E. Air Quality Improvement Deduction

	Air Quality Improvement Deduction (10% of AER, lb/qtr)
PM10	1,942

F. Increases in Permitted Emissions (IPE)

No IPE associated with this project.

G. Bankable Emissions Reductions Credits

	Total Creditable Reductions Qualified for Banking (lb)
PM10	17,480 lb

VI. COMPLIANCE

To be eligible for banking, emission reduction credits (ERC's) must be verified as being real, surplus, permanent, quantifiable, and enforceable pursuant to District Rules 2201 and 2301. In addition the application must be submitted within the timelines specified in Rule 2301.

A. Real

Visalia Coop Gin has installed more efficient emission control equipment which has reduced emissions. The AERs quantified above were based on actual, historical emissions and were calculated from actual production data and District recognized emission factors from the stationary source. The lower emission rates were validated by compliance source testing. Therefore, the reductions are real.

B. Enforceable

Authorities to Construct S-516-1-2, -1-3, and -1-4 have been implemented into Permit to Operate S-516-1-4 (See Appendix A). The current permit contains limits for the amount of bales processed per day and per year, and emission limits in PM10/bale, thereby limiting the potential to emit. Additional modifications to the process may not take place without Authority to Construct in compliance with the provisions of New and Modified Stationary Source Review (Rule 2201). Therefore the reductions are enforceable.

C. Quantifiable

The AERs were calculated using District recognized emission factors based on source testing of cotton gins in the San Joaquin Valley and actual historical production data. Therefore, the reductions are quantifiable.

D. Permanent

The replacement of screen baskets and 2D2D cyclones with a plenum chamber and 1D3D cyclones is a permanent modification to the cotton gin. Because the emission reductions result from addition of control equipment and not from shutdown of equipment, historical actual emissions from this cotton gin will not be shifted to another cotton gin. Therefore, the reductions are permanent.

E. Surplus

The replacement of screen baskets and 2D2D cyclones with a plenum chamber and 1D3D cyclones was voluntary. The resulting emission reductions are not mandated by any law, rule, regulation, agreement, or order of the District, State, or Federal Government. The reductions are not attributed to a control measure noticed for workshop or proposed, nor contained in a State Implementation Plan. Therefore, the reductions are surplus.

To determine whether the reductions were surplus with respect to Rule 4202 (Particulate Matter – Emission Rate), actual emission rates will be compared to limits in the rule. The process rate in a cotton gin varies from emission point to emission point as the trash and seeds are removed from the lint, decreasing the weight. The rate starts at 1,500 lb of seed cotton per bale of finished cotton and drops to about 500 lb of lint cotton per bale of finished cotton. Approximately 500 lb of seed is removed per bale, and approximately 400 lb of trash is removed per bale, with remaining 100 lb removed as lint and motes through the finishing stages.

The lowest pre-modification process weight rate at the #1 Lint Cleaner is approximately:

$E = 3.59 * P^{0.62}$ where:

P= process weight in tons/hr =
= (600 bales/day) x [(1500 lb/bale - 500 lb(seed)/bale – 400lb (trash)/bale)] x 1 ton/2,000 lb / (24 hr/day)
= 7.5 tph

$E = 3.59(7.5^{0.62}) = 12.5$ lb PM/hr

The highest emitting pre-modification source operation is the #1 Lint Cleaner (after seed and trash are removed). Emissions are 0.41 lb PM10/bale times 600 bales per day dividing by 24 hours per day yields 10.3 lb PM10/hr. All other source operations emit less. Therefore, compliance with this rule pre-modification is validated.

The lowest post-modification process rate weight for source operations discharging to the plenum is the #2 Precleaning Operation (only trash removed at this point).

P= process weight in tons/hr =
= (600 bales/day) x [(1500 lb/bale - 400lb(trash)/bale)] x 1 ton/2,000 lb / (24 hr/day)
= 13.8 tph

$E = 3.59(13.8^{0.62}) = 18.2$ lb PM/hr

The highest emitting post-modification source operation is the plenum chamber. Emissions are 0.48 lb PM10/bale times 600 bales per day dividing by 24 hours per day yields 12.0 lb PM10/hr. All other post-modification source operations emit less. Therefore, compliance with rule post-modification is also validated.

F. Timeliness

On October 6, 2001, the cotton gin commenced operation with the new control equipment installed. The application for ERC was received by the District on March 20, 2002, within 180 days of the October 6, 2001. Pursuant to Rule 2301, Section 4.2.3, an application for ERC must be filed no later than 180 days after the emission reductions have occurred. Because the ERC application was filed no later than 180 days after the commencing date, the application is timely.

VII. RECOMMENDATION

After public notice, comments and review, issue ERC Banking Certificate S-1842-4 to Visalia Cooperative Cotton Gin for the following amounts of PM10:

ERC	1st QTR	2nd QTR	3rd QTR	4th QTR
S-1842-4	0	0	350	17,130

Note: Visalia Coop Gin is a seasonal source. Actual emission reductions from a seasonal source are allocated on a calendar quarter basis using the fraction of the historical emissions occurring during each quarter. During the baseline period, approximately 2% of the total seasonal emissions occurred in the 3rd quarter, and 98% occurred in the 4th quarter. Therefore, 2% of the seasonal AER is allocated to the 3rd quarter, and 98% is allocated to the 4th quarter.

Appendix A

Permit to Operate Information

Pre-Modification Permit to Operate S-516-1-1

Equipment Description: COTTON GIN WITH TWO 5.0 MMBTU/HR AND ONE 2.0 MMBTU/HR GAS-FIRED BURNERS

1. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] N

2. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] N

3. Air pollution control equipment shall be in good operating condition and operate in accordance with the manufacturer's recommendations at all times when process equipment is in operation. [District Rule 1080] N

4. Fugitive dust emissions resulting from vehicular traffic shall be effectively controlled by the following methods: paving, watering, or treating with a dust-reducing compound approved by the District. [District Rule 4102] N

5. Facility grounds shall be free of accumulations of trash and spilled cotton. [District Rule 4102] N

6. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100] N

7. Daily ginning rate shall not exceed 150 tons of baled cotton per day (equivalent to 600 five hundred pound bales per day). [District Rule 2201] N

8. Ginning rate shall not exceed 18,000 tons of baled cotton per season (equivalent to 72,000 five hundred pound bales per season). [District Rule 2201] N

9. Emissions of PM-10 shall not exceed 7.32 pounds per ton of baled cotton (equivalent of 1.83 pounds per each 500 pound bale). [District Rule 2201] N

10. Permittee shall maintain daily records specifying the following: a) date, b) number of bales of cotton produced, c) weight of bales produced, and d) volume of natural gas and propane burned. [District Rule 1070] N

11. Permittee shall maintain the records of operating schedule including: start-up date, last day of operation, hours per day of operation, days per season of operation, weight of cotton baled, and annual quantities of natural gas and propane burned. [District Rule 1070] N

12. Records shall be maintained for a period of at least five years and made readily available for District inspection upon request. [District Rule 1070] N

Post-Modification Permit to Operate S-516-1-4

Equipment Description: COTTON GIN WITH TWO 5.0 MMBTU/HR AND ONE 2.0 MMBTU/HR GAS-FIRED BURNERS

1. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] N

2. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] N

3. Operation shall include plenum chamber with ten (10) 48" 1D3D cyclones serving the unloading (telescope), #1 dryer/cleaner, #2 dryer/cleaner, and overflow systems. [District Rule 2201] N

4. Operation shall include lint cotton handling system , including, five gin stands, five feeders, ten lint cleaners, and five 72" 1D3D cyclones. [District Rule 2201] N

5. Operation shall include one motes cleaning system, including: one motes served by two 54" 1D3D cyclones and one motes cleaner served by one 36" 1D3D cyclone. [District Rule 2201] N

6. Operation shall include one battery condenser system, including : one battery condenser, one lint slide, one sampler, one bale press, and three (3) 72" 1D3D cyclones. [District Rule 2201] N

7. Air pollution control equipment shall be in good operating condition and operate in accordance with the manufacturer's recommendations at all times when process equipment is in operation. [District Rule 1080] N

8. Fugitive dust emissions resulting from vehicular traffic shall be effectively controlled by the following methods: paving, watering, or treating with a dust-reducing compound approved by the District. [District Rule 4102] N

9. Facility grounds shall be free of accumulations of trash and spilled cotton. [District Rule 4102] N

10. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100] N

11. When firing on natural gas, emission from burners shall not exceed: 0.1 lb-NOx/MMBtu; 0.02 lb-CO/MMBtu; 0.0076 lb-PM10/MMBtu; 0.003 lb-SOx/MMBtu or 0.006 lb-VOC/MMBtu. [District Rule 2201] N

12. Daily ginning rate shall not exceed 150 tons of baled cotton per day (equivalent to 600 five hundred pound bales per day). [District Rule 2201] N

13. Ginning rate shall not exceed 6,250 tons of baled cotton per season (equivalent to 25,000 five hundred pound bales per season). [District Rule 2201] N

14. Total gin emissions of PM10 shall not exceed 3.08 pounds per ton of baled cotton (equivalent of 0.77 pounds per each 500 pound bale). [District Rule 2201] N

15. Emissions of PM10 from the unloading (telescope), #1 dryer/cleaner, #2 dryer/cleaner, and overflow system served by the ten 48 inch diameter 1D3D cyclones at the plenum chamber shall not exceed 0.48 lb/bale. [District Rule 2201] N

16. Emissions of PM10 from the lint cleaning, lint trash/robber, and gin stand feeder trash served by the five 72 inch diameter 1D3D cyclones shall not exceed 0.17 lb/bale. [District Rule 2201] N

17. Emissions of PM10 from the motes cleaner served by one 36 inch diameter 1D3D cyclone and the motes served by two 54 inch diameter 1D3D cyclones shall not exceed 0.02 lb/bale and 0.07 lb/bale, respectively. [District Rule 2201] N

18. Emissions of PM10 from the Battery Condenser served by three 72 inch diameter 1D3D cyclones shall not exceed 0.03 lb/bale. [District Rule 2201] N

19. Permittee shall maintain daily records specifying the following: a) date, b) number of bales of cotton produced, c) weight of bales produced, and d) volume of natural gas and propane burned. [District Rule 1070] N

20. Permittee shall maintain the records of operating schedule including: start-up date, last day of operation, hours per day of operation, days per season of operation, weight of cotton baled, and annual quantities of natural gas and propane burned. [District Rule 1070] N

21. Records shall be maintained for a period of at least five years and made readily available for District inspection upon request. [District Rule 1070] N

Appendix B

Tables of Emission Factors from Cotton Gin Emission Factor Handbook

GIN TYPE: *SAW*			
CONTROL: *1D-3D*			
	EMISSIONS (lb PM_{10} /bale)		
SYSTEM	AVG.	+S.D.	-S.D.
Unloading	.11	.16	.06
#1 Precleaning	.11	.14	.09
#2 Precleaning	.08	.12	.04
#3 Precleaning	.09	.18	.00
Overflow	.04	.06	.01
Gin Stand/Feeder Trash	.09	.12	.05
#1 Lint Cleaning [1]	.10	.10	.10
#2 Lint Cleaning [1]	.03	.03	.03
Lint Cleaning [2]	.11	.17	.05
Lint Trash/Robber	.07	.09	.05
Battery Condenser	.03	.07	.01
Motes	.07	.12	.02
Motes Cleaner Trash	.02	.02	.02
Stockpiler	.09	.12	.06
TOTAL [3]	0.91	1.37	0.45

[1] Use when lint cleaner condenser fan is pulling from a single stage of condensers
[2] Use when lint cleaner condenser fan is pulling from both 1st and 2nd stage condensers
[3] Assumes total "lint cleaning" emission factor instead of individual stages

GIN TYPE: *ROLLER*			
CONTROL: *1D-3D*			
	EMISSIONS (lb PM_{10} /bale)		
SYSTEM	AVG.	+S.D.	-S.D.
Unloading	.23	.30	.16
#1 Precleaning	.24	.42	.06
#2 Precleaning	.14	.14	.14
#3 Precleaning	.19	.26	.13
Overflow	.03	.03	.03
Gin Stand/Feeder Trash	.04	.06	.03
#1 Lint Cleaning [1]	.02	.03	.01
#2 Lint Cleaning [1]	.04	.06	.03
Lint Cleaning [2]	.05	.08	.02
Lint Trash/Robber	.03	.04	.02
Battery Condenser	.07	.10	.05
Motes	N/A	N/A	N/A
Motes Cleaner Trash	N/A	N/A	N/A
Stockpiler	.06	.06	.06
TOTAL [3]	1.08	1.49	0.7

[1] Use when lint cleaner condenser fan is pulling from a single stage of condensers
[2] Use when lint cleaner condenser fan is pulling from both 1st and 2nd stage condensers
[3] Assumes total "lint cleaning" emission factor instead of individual stages

From "Cotton Gin Emission Factors Handbook", California Cotton Ginners Association, various revisions

GIN TYPE: *SAW*			
CONTROL: *SCREEN BASKET*			
	EMISSIONS (lb PM_{10} /bale)		
SYSTEM	AVG.	+S.D.	- S.D.
Unloading	N/A	N/A	N/A
#1 Precleaning	N/A	N/A	N/A
#2 Precleaning	N/A	N/A	N/A
#3 Precleaning	N/A	N/A	N/A
Overflow	N/A	N/A	N/A
Gin Stand/Feeder Trash	N/A	N/A	N/A
#1 Lint Cleaning [1]	.48	.48	.48
#2 Lint Cleaning [1]	.30	.30	.30
Lint Cleaning [2]	.78	.78	.78
Lint Trash/Robber	N/A	N/A	N/A
Battery Condenser	.17	.17	.17
Motes	N/A	N/A	N/A
Motes Cleaner Trash	N/A	N/A	N/A
Stockpiler	N/A	N/A	N/A
TOTAL [3]	0.95	0.95	0.95

1 Use when lint cleaner condenser fan is puling from a single stage of condensers
2 Use when lint cleaner condenser fan is puling from both 1st and 2nd stage condensers
3 Assumes total "lint cleaning" emission factor instead of individual stages

GIN TYPE: *ROLLER*			
CONTROL: *SCREEN BASKET*			
	EMISSIONS (lb PM_{10} /bale)		
SYSTEM	AVG.	+S.D.	- S.D.
Unloading	N/A	N/A	N/A
#1 Precleaning	N/A	N/A	N/A
#2 Precleaning	N/A	N/A	N/A
#3 Precleaning	N/A	N/A	N/A
Overflow	N/A	N/A	N/A
Gin Stand/Feeder Trash	N/A	N/A	N/A
#1 Lint Cleaning [1]	N/A	N/A	N/A
#2 Lint Cleaning [1]	N/A	N/A	N/A
Lint Cleaning [2]	N/A	N/A	N/A
Lint Trash/Robber	N/A	N/A	N/A
Battery Condenser	N/A	N/A	N/A
Motes	N/A	N/A	N/A
Motes Cleaner Trash	N/A	N/A	N/A
Stockpiler	N/A	N/A	N/A
TOTAL [3]	0	0	0

1 Use when lint cleaner condenser fan is puling from a single stage of condensers
2 Use when lint cleaner condenser fan is puling from both 1st and 2nd stage condensers
3 Assumes total "lint cleaning" emission factor instead of individual stages

October 13, 1998 Page 4

From "Cotton Gin Emission Factors Handbook", California Cotton Ginners Association, various revisions

GIN TYPE: SAW CONTROL: 2D-2D			
	EMISSIONS (lb PM_{10} /bale)		
SYSTEM	AVG.	+S.D.	- S.D.
Unloading	.21	.23	.18
#1 Precleaning	.29	.54	.05
#2 Precleaning	.21	.41	.00
#3 Precleaning	.12	.16	.08
Overflow	.04	.04	.04
Gin Stand/Feeder Trash	.04	.04	.04
#1 Lint Cleaning [1]	N/A	N/A	N/A
#2 Lint Cleaning [1]	N/A	N/A	N/A
Lint Cleaning [2]	.73	.73	.73
Lint Trash/Robber	.24	.24	.24
Battery Condenser	N/A	N/A	N/A
Motes	.25	.40	.10
Motes Cleaner Trash	.02	.02	.02
Stockpiler	.09	.09	.09
TOTAL [3]	2.24	2.9	1.67

[1] Use when lint cleaner condenser fan is puling from a single stage of condensers
[2] Use when lint cleaner condenser fan is puling from both 1st and 2nd stage condensers
[3] Assumes total "lint cleaning" emission factor instead of individual stages

GIN TYPE: ROLLER CONTROL: 2D-2D			
	EMISSIONS (lb PM_{10} /bale)		
SYSTEM	AVG.	+S.D.	- S.D.
Unloading	0.06	0.06	0.06
#1 Precleaning	0.23	0.23	0.23
#2 Precleaning	N/A	N/A	N/A
#3 Precleaning	N/A	N/A	N/A
Overflow	N/A	N/A	N/A
Gin Stand/Feeder Trash	N/A	N/A	N/A
#1 Lint Cleaning [1]	N/A	N/A	N/A
#2 Lint Cleaning [1]	N/A	N/A	N/A
Lint Cleaning [2]	N/A	N/A	N/A
Lint Trash/Robber	N/A	N/A	N/A
Battery Condenser	N/A	N/A	N/A
Motes	N/A	N/A	N/A
Motes Cleaner Trash	N/A	N/A	N/A
Stockpiler	N/A	N/A	N/A
TOTAL [3]	N/A	N/A	N/A

[1] Use when lint cleaner condenser fan is puling from a single stage of condensers
[2] Use when lint cleaner condenser fan is puling from both 1st and 2nd stage condensers
[3] Assumes total "lint cleaning" emission factor instead of individual stages

From "Cotton Gin Emission Factors Handbook", California Cotton Ginners Association, various revisions

Appendix C

Source Test Summaries

Compliance Source Test Review

Company: Visalia Cotton Gin. COOP		Date 1/5-7.07
APCD Permit #'S- 516-1-2	Exp Date: ATC	Source Test Co: Air . X Testing
Contact: Roger Tisdell		

Equipment Number:

10-B3 Cyclone System serving a Plenum Chamber System
(1) Lint Cleaner and Motes

Reason For Testing - Initial ( ), Annual ( ), Rule ( ), or EPA ( ). 2201

APPLICABLE RULES - 1081 sampling; 2021 Exp Req; 8201 NSR; 2301 ERC; 4007 NESHP; 4101 visible emissions; 4301 fuels; 4701 I.C. Engines; 4703 Turbine; 4405 NOx; 4406 Sulfur; 4305 Boiler & 4351 Boiler

Pollutant	Result (lb/hr)	Limit	Result (lb/MMBTU)	Limit	Result (ppm or grain load)	Limit
PM Lint Cleaner	0.165	Avg. (0.27)lb/bale	0.170	1 (0.27)lb/bale	0.160	2 (0.27)lb/bale
PM Plenum	0.741 / 0.855	Avg. (0.34)lb/bale	1.015	1 (0.34)lb/bale	0.467	2 (0.34)lb/bale
PM Motes	0.063	(0.02)lb/bale		( )lb/bale		( )lb/bale
Fuel Sulfur as SO2		( )lb/hr		( )lb/MMBTU		( ) ppm @ % O2
Waste Sulfur		( )lb/hr		( )lb/MMBTU		( ) ppm @ % O2
Total Sulfur		( )lb/hr		( )lb/MMBTU		( ) ppm @ % O2
NOx		( )lb/hr		( )lb/MMBTU		( ) ppm @ % O2
CO		( )lb/hr		( )lb/MMBTU		( ) ppm @ % O2
VOC		( )lb/day		( )dest. Eff.		( ) ppm @ % O2
Relative Accuracy	NOx		CO		O2	
Ammonia Slip		( )lb/hr		( )lb/MMBTU		( ) ppm @ % O2

Source Operating Under Normal Conditions - Yes (Y) No ( )
Is Enforcement Action Necessary - Yes (Y) No ( )
Reason For Enforcement Action: Plenum Chamber + Motes failed to Comply w/ PM emission limits

Compliance Reviewed By: [signature] Date: 1/16/07

San Joaquin Valley Air Pollution Control District

SOURCE TEST RESULTS DATABASE RECORD ID **3595**

Company: **VISALIA CO-OP COTTON GIN** Date 10/16/200 Pass Fail

Permit **S-0516-0001-03** Facility 516 Unit Id: PLENUM CHAMBER (2OF10)

TEST CONDUCTED FOR THE FOLLOWING PERMIT REQUIREMENT Invalid AMS-Fail

Annual Initial CEM Retest EPA Rep AMS

Shared Pemits:

APPLICABLE RULES

2201 4001 4305 4351 4701 4703 Other

2 consec Next Test AIR-X TESTING Test AIRX101602

Equipment: COTTON GIN, PLENUM CHAMBER, LINT CLEANER & MOTES

Equip type: COTTON GIN Input Output

CONTROL EQUIPMENT

Catalyst H2O/Stm inj NH3/SCR Scrubbe Baghous FGR O2 Lo NOx

Incin Stage comb PSC PCC Rich burn Lean Cyclon DLN ESP

FUEL DATA AND OPERATIONAL DATA

Fuel F-Factor BTU: Fuel rate:

Second O2% 0 Stack 0 Process

FGR Test: FGR FGR

POLLUTANTS TESTED

PM CO NOx VOC SO2 NH3 Fuel S Waste S Other

TEST RESULTS

	lbs/hr		lbs/MMBtu		O2		
	Result	Limit	Result	Limit	Result	Limit	
PM-10	**0.4293**	0.741					gr/dsc
SO2							ppm @O2 corr.
NOx							ppm @O2 corr.
CO							ppm @O2 corr.
VOC							ppm @O2 corr.
Fuel S		%		gr/scf			ppm
NH3							ppm
							ppm @O2 corr.
							ppm @O2

CO NOx SO2 O2/CO2 VOC H2S rata:

Operation at Maximum Enforcement NOV #: Report 11/7/2002

Reason for

Review GLENN SLITOR Review 1/22/2003 Permit Exp

C/O C/O PAS____ Log Book____ Area: 1

Telephone Conversation

With: Roger Isom, Cal Cotton Ginners Assoc.

APCD Rep: Steve Tomlin

Date/Time: 10/10/2002

Re: Review of 10/08/02 fax

I called RI and told him that his calcs look ok. RI said he will be communicating with Visalia Coop Gin and will send the District a letter within a few days.

Telephone Conversation

With: Roger Isom, Cal Cotton Ginners Assoc.

APCD Rep: Steve Tomlin

Date/Time: 10/07/02

Re: Emission Calcs

I called RI to discuss the emission calcs he faxed to the District on October 3, 2002. I told him that his numbers matched my preliminary numbers for ERCs, providing Visalia Coop submits an application for ATC to restrict throughput to 25,000 bales per year, and lower the plenum emission factor such that the overall emission factors was 0.81 lb/bale. RI said he would review the findings with the gin and put together a letter.

Telephone Conversation

With: Roger Isom, Cal Cotton Ginners

APCD Rep: Steve Tomlin

Date/Time: 10/03/2002

Re: Emission Calcs and Course of Action

I reviewed RI's emission calcs in his 9/30 fax with him. We discussed the historical data, and a discrepancy for the year 2000 production. Some references were made to 20,571 bales per year while other references were made to 25,071 bales per year. RI said he would look into. I gave him my preliminary figures: at a PE2 of 30,000 bales per year, ERC=12,935 lbs; at a PE2 of 25,000 bales per year, ERC = 16,580 lbs.

I also explained that the District would probably be able to consider the test results from the upcoming source test in the ERC application provided an ATC application was submitted to lower the limits to make the PE enforceable. RI said that would be fine. I asked RI to send in letter describing what their intent is.

KARL M. SMITH, INC.

1204 DAIRY AVE.–P.O. BOX 817–CORCORAN, CALIF. 93212–PH. (559)992-4109
Contractor License 492835

June 21, 2002

Tom Goff
Permit Services Manager, Southern Region
San Joaquin Valley Unified Air Pollution Control District
2700 M Street, Suite 275
Bakersfield, CA 93301-2370

Re: **Project S-1020253**

In response to your letter dated June 18, 2002, and on behalf of Visalia Coop Gin we would like to request an amendment to Project No. S-1020253. Specifically, we would like to request to modify the proposed to emission factor for the emissions from the plenum chamber from 0.48 lb PM10/bale to 0.741 lb PM10/bale. This change reflects the results of a source test conducted this past season, and was recommended by the District.

Please note that Visalia Coop will be conducting a follow-up source test this season on the plenum chamber system. Visalia Coop will bank any additional ERCs that become available through the source test.

Thank you for your prompt response to our letter on this very important issue.

Sincerely,

Karl M. Smith, Inc.

Victor Gamez Jr

cc: Larry Gallian, Visalia Cooperative Gin
Roger Isom California Cotton Ginners
Steve Tomlin SJVAPCD

California Cotton Ginners Association

1941 N. Gateway Blvd., Suite 101
Fresno, CA 93727
Telephone: 559 / 252-0684
Fax: 559 / 252-0551

FAX TRANSMISSION SHEET

of pages: **4** (including cover sheet)

Date: **October 8, 2002**

To: **Steve Tomlin**

Co: **SJVUAPCD - Southern Region**

Fax: **1-661-326-6985**

From: **Roger A. Isom**
Vice President/Director of Technical Services

Fax: **(559)252-0551**

If you do not receive the complete fax, please contact our office immediately at (559)252-0684. Thank you.

Message:

Attached are the revised calculations, based on the updated emission factors. Do you concur.

Roger

10/3/02 R. Isom

Visalia Coop ERC Calculations

Baseline

1999 - 17,153 bales/yr

2000 - 25,071 bales/yr

21,132 bales/yr

Emission Factor

Assume original proposal -

EF_{bp} = 1.83 lb PM_{10}/bale

EF_{up} = ~~0.81~~ 0.77 lb PM_{10}/bale

ERC Calculations

Assume permit limit of 25,000 bales/yr.

AER = HAE - PE

$$AER = \left(1.83 \frac{lb\ PM_{10}}{bale}\right)\left(21{,}132 \frac{bales}{yr}\right) - \left(\cancel{0.81}\ 0.72 \frac{lb\ PM_{10}}{bale}\right)\left(25{,}000 \frac{bales}{yr}\right)$$

AER = 38671.6 - ~~20,250~~ 19,250

AER = ~~19,421.6~~ lb PM_{10}/yr

19,921.6

$$ERC_s = AER \times 90\%$$

$$ERC = \left(\cancel{8,421.6}\ 19,421.6 \frac{lb PM_{10}}{yr}\right)(0.90)$$

$$ERC = \cancel{16,579.4}\ 17,479.4 \frac{lb PM_{10}}{yr}$$

Visalia Coop

System	Emission Factor (lb PM10/bale)
Plenum Chamber[1]	0.48
Lint Cleaning System[2]	0.17
Motes Cleaner	0.07
Motes Cleaner	0.02
Battery Condenser	0.03
Total Emissions =	0.77

[1] System controls emission from Unloading, #1 Precleaning, #2 Precleaning, and Overflow systems

[2] System controls emissions from Gin Stand/Feeder, Trash, Lint Cleaner, and Lint Cleaner Trash Systems

California Cotton Ginners Association

1941 N. Gateway Blvd., Suite 101
Fresno, CA 93727
Telephone: 559 / 252-0684
Fax: 559 / 252-0551

FAX TRANSMISSION SHEET

of pages: 3 (including cover sheet)

Date: **October 3, 2002**

To: **Steve Tomlin**

Co: **SJVUAPCD - Southern Region**

Fax: **1-661-326-6985**

From: **Roger A. Isom**
Vice President/Director of Technical Services

Fax: **(559)252-0551**

If you do not receive the complete fax, please contact our office immediately at (559)252-0684. Thank you.

Message:

The attached calculations are as we discussed. If there is any errors, please call me. If they are ok, we will follow up with a letter as you requested.

Thanks,

Roger

100% COTTON

Assume original proposal –

$EF_{b,p}$ = 1.83 lb PM_{10}/bale

$EF_{a,p}$ = 0.81 lb PM_{10}/bale

ERC Calculations

Assume permit limit of 25,000 bales/yr.

AER = HAE – PE

$$AER = \left(1.83 \frac{lb\,PM_{10}}{bale}\right)\left(21{,}132 \frac{bales}{yr}\right) - \left(0.81 \frac{lb\,PM_{10}}{bale}\right)\left(25{,}000 \frac{bales}{yr}\right)$$

AER = 38671.6 – 20,250

AER = 18,421.56 $\frac{lb\,PM_{10}}{yr}$

10/3/02 R. Isom

Visalia Coop ERC Calculations

Baseline

1999 - 17,193 bales/yr

2000 - 25,071 bales/yr

21,132 bales/yr

Emission Factor

$$ERC_s = AER \times 90\%$$

$$ERC = \left(6,421.6 \frac{lbPM_{10}}{yr}\right)(0.90)$$

$$ERC = 16,579.4 \frac{lbPM_{10}}{yr}$$

San Joaquin Valley
Air Pollution Control District

RECEIVED
SEP 3 0 2002
BY:

Fax Transmittal

1990 E. Gettysburg Avenue
Fresno, California 93726-0244
Phone (559) 230-6000
Fax (559) 230-6061

Date : September 30, 2002

To : Tom Goff **Fax Number :** 661/326-6985

From : Seyed **Number of pages (includes cover sheet):** 5

Description :

- ☐ Per Your Request
- ☐ Per Our Conversation
- ☐ Take Appropriate Action
- ☐ Please Answer
- ☒ For Your Information
- ☐ For Your Approval
- ☐ Review & Comment
- ☐ Review & Return
- ☐ Original transmittal will follow via mail

Remarks / Response :

California Cotton Ginners Association

1941 N. Gateway Blvd., Suite 101
Fresno, CA 93727
Telephone: 559 / 252-0684
Fax: 559 / 252-0551

FAX TRANSMISSION SHEET

of pages: 4 (including cover sheet)

Date: **September 27, 2002**

To: **Seyed Sadredin**

Co: **SJVUAPCD**

Fax: **230-6061**

From: **Roger A. Isom**
Vice President/Director of Technical Services

Fax: **(559)252-0551**

If you do not receive the complete fax, please contact our office immediately at (559)252-0684. Thank you.

Message:

Attached are some rough calculations on the potential ERCs for Visalia Coop comparing the old NSR rule vs. the new NSR rule. Please review and call me to discuss. Thanks.

Roger

100% COTTON

OLD NSR RULE

$EF_{bp} = 1.83 \frac{lb\ PM_{10}}{bale}$

Historical Average Production = 17,334 $\frac{bales}{yr}$ ($\frac{1\ yr}{365\ days}$

$EF_{ap1} = 1.031 \frac{lb\ PM_{10}}{bale}$

$EF_{ap2} = 0.81 \frac{lb\ PM_{10}}{bale}$

Actual Emission Reductions (AER)

Part 1

$AER = HAE(\Delta EF)$

$AER = \left(1.83 \frac{lb\ PM_{10}}{bale}\right)\left(17,334 \frac{bales}{yr}\right)\left(\frac{1.83 - 1.031}{1.83}\right)$

$AER = (1.83)(17,334)(.437)$

$AER = 13,849.9 \frac{lb\ PM_{10}}{yr}$

Part 2

$AER = \left(1.031 \frac{lb\ PM_{10}}{bale}\right)\left(17,334 \frac{bales}{yr}\right)$

$AER = (1.031)(17,334)\left(\frac{1.03 - .81}{1.031}\right)$

$AER = 3830.8 \frac{lb\ PM_{10}}{yr}$

AER_{TOTAL} = 13,641.9 + 3830.8

= 17,680.7 $\frac{lbPM_{10}}{yr}$

ERC_s = 90% AER

ERC_s = 15,912.6 $\frac{lbPM_{10}}{yr}$

NEW NSR RULE

@ 30,000 bales/yr

$AER = HAE - PE$

$AER = (1.83)(17,334) - (0.81)(30,000)$

$AER = 7,481 \frac{lb\,PM_{10}}{yr} \Rightarrow ERC_s = 6,678.9 \frac{lb\,PM_{10}}{yr}$

@ 25,000 bales/yr

$AER = (1.83)(17,334) - (0.81)(25,000)$

$AER = 11,471.22 \frac{lb\,PM_{10}}{yr} \Rightarrow ERC_s = 10,334.1\ lb\,PM_{10}/yr$

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#10220

S. Tomlin

San Joaquin Valley
Air Pollution
Control District

SOUTHERN REGION
2700 M Street, #275
Bakersfield, CA 93301-2370
www.valleyair.org

12

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Larry Gallian
Visalia Coop Gin
P.O. Box 1208
Visalia, CA 93279

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* | B. Date of Delivery: 9-20-02

C. Signature: x D.L. Gallian ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐

2. Article Number *(Copy from service label)* 7000 1670 0004 7165 0451

PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952

U.S. Postal Service
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(Domestic Mail Only; No Insurance Coverage Provided)

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Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

S.T.
Postmark Here
9-17-02

Sent To: Larry Gallian
Street, Apt. No.; or PO Box No.: Visalia Coop Gin
City, State, ZIP+4:

PS Form 3800, May 2000 See Reverse for Instructions

7000 1670 0004 7165 0451

San Joaquin Valley
Air Pollution Control District

September 17, 2002

Visalia Cooperative Cotton Gin
Attn: Larry Gallian, Manager
P O Box 1208
Visalia, CA 93279

Re: Notice of Imminent Denial - Application for Emission Reduction Credits
Project Number: 1020219

Dear Mr. Gallian:

Processing of your application for Emission Reduction Credits (ERCs) resulting from the replacement of 2D-2D cyclones and screen baskets with 1D-3D cyclones at your cotton gin reveals that no emission reductions qualify for banking as currently proposed.

The Federal Environmental Protection Agency required the District to adopt the June 21, 2001 amendments to District Rule 2201, New and Modified Stationary Source Review Rule to make it consistent with the Clean Air Act of 1990. One reviosion changed the calculation for determining actual emission reductions (AER) to the difference between the historical actual emissions and post-project potential to emit. Because your post-project potential to emit is greater than the historical actual emissions, there is no AER and no emissions reductions quality for banking.

Should you amend your gin permit to lower the potential to emit by decreasing the number of bales produced in a season, some reductions may be available for banking. The lower potential to emit must be authorized by an Authority to Construct and implemented into a Permit to Operate. Please note, based on preliminary calculations the potential to emit would need to be reduced by over half before any AER would result. Our preliminary calculations indicate the historical actual emissions are 39,420 lbs/yr, while the potential to emit is 74,232 lb/yr.

David L. Crow
Executive Director/Air Pollution Control Officer

Northern Region Office
4230 Kiernan Avenue, Suite 130
Modesto, CA 95356-9322
(209) 557-6400 ◆ FAX (209) 557-6475

Central Region Office
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
(559) 230-6000 ● FAX (559) 230-6061

Southern Region Office
2700 M Street, Suite 275
Bakersfield, CA 93301-2370
(661) 326-6900 ◆ FAX (661) 326-6985

Please respond within 30 days. If no further correspondence is received, the District will proceed with a preliminary decision for granting of zero emission reduction credits.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Steve Tomlin of Permit Services at (661) 326-6968.

Sincerely,

Seyed Sadredin
Director of Permit Services

Thomas E. Goff, P.E.
Permit Services Manager

svt

cc: Roger Isom, California Cotton Ginners Association
1941 N. Gateway Blvd., Suite 101
Fresno, CA 93727

San Joaquin Valley
Air Pollution Control District

July 31, 2002

Visalia Cooperative Cotton Gin
Attn: Larry Gallian, Manager
P O Box 1208
Visalia, CA 93279

Re: Application for Emission Reduction Credits (ERCs)
Project Number: 1020219

Dear Mr. Gallian:

The Air Pollution Control District is in receipt of the additional information requested regarding the above-referenced project, and has again reviewed the application for completeness.

Based on this review, the application now appears to be complete. However, during the processing of this application, the District may request additional information to clarify, correct or otherwise supplement the information on file.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Thomas Goff at (661) 326-6900.

Sincerely,

Seyed Sadredin
Director of Permit Services

for Thomas E. Goff, P.E.
Permit Services Manager

svt

David L. Crow
Executive Director/Air Pollution Control Officer

Northern Region Office
4230 Kiernan Avenue, Suite 130
Modesto, CA 95356-9322
(209) 557-6400 ● FAX (209) 557-6475

Central Region Office
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
(559) 230-6000 ◆ FAX (559) 230-6061

Southern Region Office
2700 M Street, Suite 275
Bakersfield, CA 93301-2370
(661) 326-6900 ◆ FAX (661) 326-6985

San Joaquin Valley
Air Pollution Control District

June 18, 2002

Calfiornia Cotton Ginners Association
Attn: Roger A. Isom, VP & Director of Technical Services
1941 N. Gateway Blvd., Suite 101
Fresno, CA 93727

Re: Application for Emission Reduction Credits
Project Number: 1020219

Dear Mr. Isom:

We are in receipt of a your May 20, 2002 dated letter regarding the application for Emission Reduction Credits (ERCs) submitted by Visalia Cooperative Cotton Gin. Your letter requests confirmation of your understanding of the District's proposed actions concerning the ERC application.

First, unless the Visalia Cooperative Cotton Gin requests to change the proposed emission factor for the plenum from 0.48 lb/bale to 0.741 lb/bale in recently submitted project S-1020253, there will be no emission reductions available for banking for the plenum. This is because the Permit to Operate does not contain enforceable emission limits which compliance has been demonstrated through source testing.

However, if Visalia Cooperative Gin requests an amendment to project S-1020253 to raise the proposed emission factor from 0.48 lb/bale to 0.741 lb/bale, there will be some emission reductions from the plenum available for banking when the Authority to Construct issued in project 1020253 is converted to a Permit to Operate (automatic upon ATC upon issuance).

Please note, the request for amendment for project S-1020253 must be received as soon as possible to allow the changes to be incorporated in the Authority to Construct. Otherwise, there will be no enforceable emission reductions from the ATC qualifying for banking.

Second, if a source test next seasons documents emissions from the plenum lower than 0.741 lb/bale, Visalia Coop Gin may elect to submit an application for Authority to Construct to lower the emission factor below 0.741 lb/bale and, simultaneously, submit an application to bank additional ERC's . Please note, in order for any ERCs to be granted, the application for ERCs must be received within 180 days of when the reduction occurred.

David L. Crow
Executive Director/Air Pollution Control Officer

A key part of any validation of ERC's in such a banking application will be in establishing when the reductions actually occurred and whether the application to bank is timely (i.e. within 180 days of the date the reduction took place).

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Steve Tomlin of Permit Services at (661) 326-6968.

Sincerely,

Seyed Sadredin
Director of Permit Services

Thomas E. Goff, P.E.
Permit Services Manager

svt

cc: Larry Gallian, Manager
Visalia Cooperative Cotton Gin
P O Box 1208
Visalia, CA 93279

California Cotton Ginners Association

1941 N. Gateway Blvd., Suite 101
Fresno, CA 93727
Telephone: 559 / 252-0684
Fax: 559 / 252-0551

RECEIVED

MAY 22 2002

SAN JOAQUIN VALLEY UNIFIED
APCD-SOUTHERN REGION

May 20, 2002

Mr. Tom Goff
Permit Services Manager, Southern Region
San Joaquin Valley Unified Air Pollution Control District
2700 M Street, Suite 275
Bakersfield, CA 93301-2370

Re: **Application for Emission Reduction Credits - Visalia Coop Gin**
Project No.: 1020219

Dear Mr. Goff,

Per our discussion earlier today, I am writing this letter to confirm our understanding of the District's proposed actions concerning Visalia Coop Cotton Gin's application for emission reduction credits (ERCs). As you know, Visalia Coop Cotton Gin replaced their screen baskets and "2D-2D" cyclones with "1D-3D" cyclones this past season. A source test was conducted and the emissions from the plenum chamber and cyclones exceeded what we had proposed. Despite this, Visalia Coop proceeded to go ahead and apply for the ERCs to meet the requirement to file for the ERCs within 180 days from the date the reduction occurred.

According to your recent letter dated May 13, 2002, the SJVUAPCD is proposing to deem Visalia Coop's ERC application complete and begin processing it. As I understand our discussion from this morning, the District will issue the emission reduction credits for the reduction from the pre-project emission factor down to 0.741 lb PM_{10}/bale. Then, should Visalia Coop achieve a lower emission factor during this upcoming season's source test, Visalia Coop could then apply for the emission reductions for the additional decrease. Visalia Coop would have to provide an additional explanation for this decrease, which we believe will be achieved once all cyclones are functioning and operating properly. This scenario is somewhat different from what is spelled out in your May 13, 2002 letter, so it is important that you please confirm our understanding of this situation. Can you please confirm our understanding?

Thank you for your time and effort on this critical issue for Visalia Coop. It is truly appreciated. Should you have any questions regarding this letter, please contact me at (559)252-0684.

Sincerely,

Roger A. Isom
Vice President & Director of Technical Services

c: Larry Gallian, Visalia Coop
Victor Gamez, Karl Smith, Inc.

San Joaquin Valley
Air Pollution Control District

May 13, 2002

Visalia Cooperative Cotton Gin
Attn: Larry Gallian, Manager
P O Box 1208
Visalia, CA 93279

Re: Application for Emission Reduction Credits
Project Number: 1020219

Dear Mr. Gallian:

We are in receipt of your April 23, 2002 dated letter and information submitted in response to the District's request for information dated April 16, 2002.

Thank you for submitting the requested production data.

Please note, your proposal to "hold" this application until autumn of 2002 when another source test may be performed is not feasible. Pursuant to Rule 2301, the District must issue a final decision within 120 days of determining the application is complete. The District is now ready to deem the application complete.

Please note that unless Visalia Cooperative Cotton Gin requests to change the proposed emission factor for the plenum from 0.48 lb/bale to 0.741 (and preferable slightly higher) lb/bale in recently submitted project S-1020253, there will be no emission reductions available for banking. This is because the Permit to Operate does not contain enforceable emission limits which compliance has been demonstrated through source testing.

The District indicated in its previous letter that because the actual emissions from the plenum chamber cyclones were source tested at 0.741 lb/bale (avg. of two cyclones at 1.015 and 0.467), emission reductions below 0.741 lb/bale for the plenum couldn't be granted at this time.

The District also indicated that in order for emission reductions down to 0.741 lb/bale to be granted, an emission factor of no lower than 0.741 lb/bale for the plenum must be included on a valid Permit to Operate in order for the emission reductions to be enforceable.

David L. Crow
Executive Director/Air Pollution Control Officer

Visalia, Coop Gin recently submitted an application in which an emission factor of 0.48 lb/bale for the plenum was proposed. Because this limit is lower than the level achieved during the last source test, further source testing would be required in order to validate compliance before the Authority to Construct could be implemented into a Permit to Operate, thus making any emission reductions real and enforceable as required by Rule 2201, New and Modified Stationary Source Review.

The District explained that you may choose to amend your previously submitted application to change the proposed emission factor for the plenum from 0.48 lb/bale to 0.741 lb/bale. Doing so will allow emission reductions down to 0.741 lb/bale to be enforceable, as the issued Authority to Construct will be converted to a Permit to Operate upon issuance.

Please note that in contrast to the statement made in the District's April 16, 2002 letter, it appears no emission reductions below 0.741 lb/bale would be available for banking in the future since any future application would not be received within 180 days of the date the reduction occurred.

If you still wish to proceed with banking of emissions, please amend project S1020253 to change the proposed emission factor for the plenum from 0.48 lb/bale to 0.741 lb/bale (and preferable slightly higher).

In response, please refer to the above project number, and send to the attention of Mr. Steve Tomlin.

Please respond within 30 days. If no further correspondence is received, the District will deem the application complete and proceed with a preliminary decision for granting of zero emission reduction credits.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Steve Tomlin of Permit Services at (661) 326-6968.

Sincerely,

Seyed Sadredin
Director of Permit Services

Thomas E. Goff, P.E.
Permit Services Manager
svt

VISALIA COOPERATIVE COTTON GIN

GIN DEPARTMENT - FERTILIZER DEPARTMENT
POST OFFICE BOX 1208 VISALIA, CALIFORNIA 93279
PHONE 732-1365 • DINUBA 591-3112

April 23, 2002

Mr. Tom Goff
Permit Services Manager, Southern Region
San Joaquin Valley Unified Air Pollution Control District
2700 M Street, Suite 275
Bakersfield, CA 93301-2370

Re: Notice of Incomplete Application - Emission Reduction Credits
Project No. 120219 102019 S-516 RUE

Dear Mr. Goff,

In response to your letter dated April 16, 2002, we have enclosed the requested bale information for the 1997 and 2000 seasons (see attached). Furthermore, we would like to address the comments regarding the results of the initial source test.

It should be noted that Visalia Coop fully intends to conduct another source test this upcoming season. As noted in previous correspondence to the District (see letter dated March 27, 2002 from Roger Isom, CCGGA to Richard Edgehill, SJVUAPCD), a unseen problem was discovered with the plenum chamber at the end of the season. This problem was noted to the District and has since been corrected. This was also mentioned to the District at a meeting with District personnel on March 19, 2002. There was an additional problem with the original engineering analysis regarding the District's proposed emission factor for the plenum chamber. Visalia Coop has submitted an authority to construct application to correct the problem.

Once the source test has been performed this next season, Visalia Coop will submit the results to the District, so that the ERC application can be finalized. In the meantime, if you have any questions, please let me know.

Sincerely,

Larry Gallian

Larry Gallian
Manager

enclosures

c: Roger Isom, CCGGA
Victor Gamez, Karl Smith Inc.

VISALIA COOPERATIVE COTTON GIN

GIN DEPARTMENT - FERTILIZER DEPARTMENT
POST OFFICE BOX 1208 VISALIA, CALIFORNIA 93279
PHONE 732-1365 • DINUBA 591-3112

MR. TOM GOFF,

PLEASE FIND ENCLOSED THE PRODUCTION RECORDS YOU REQUESTED FOR THE 1997 AND 200 SEASONS

BALES PER MONTH

1997					
		SEPT.	OCT.	NOV.	DEC.
		447	13089	3920	412

2000					
		SEPT.	OCT.	NOV.	DEC.
		828	12338	11156	749

IF MORE INFORMATION IS NEEDED FELL FREE TO CONTACT ME AT ANYTIME.

SINCERELY,

Larry Gallian

LARRY GALLIAN

San Joaquin Valley
Air Pollution Control District

April 16, 2002

Visalia Cooperative Cotton Gin
Attn: Larry Gallian, Manager
P O Box 1208
Visalia, CA 93279

Re: Notice of Incomplete Application - Emission Reduction Credits
Project Number: 1020219

Dear Mr. Gallian:

The District has completed a preliminary review of your application for Emission Reduction Credits (ERCs) resulting from the replacement of 2D-2D cyclones and screen baskets with 1D-3D cyclones at your cotton gin located at Road 132 and Avenue 336 in Visalia, California.

Based on this preliminary review, the application has been determined to be incomplete. The following information is required prior to further processing:

1. Please provide cotton bale production information for the 1997 and 2000 seasons on a calendar quarter basis (i.e. production in September, and production in Oct-Dec). This information is required for these two seasons only since other seasons occurred completely within the 4th quarter.

Please note, because the actual emissions from the plenum chamber cyclones were source tested at 0.741 lb/bale (avg. of two cyclones at 1.015 and 0.467), emission reductions below 0.741 lb/bale for the plenum cannot be granted at this time.

In fact, in order for emission reductions down to 0.741 lb/bale to be granted, an emission factor of no lower than 0.741 lb/bale (and preferable slightly higher) for the plenum must be included on a valid Permit to Operate in order for the emission reductions to be enforceable.

Visalia, Coop Gin recently submitted an application in which an emission factor of 0.48 lb/bale for the plenum was proposed. Because this limit is lower than the level achieved during the last source test, further source testing would be required in order to validate compliance before the Authority to Construct could be implemented into a Permit to Operate.

David L. Crow
Executive Director/Air Pollution Control Officer

However, you may choose to amend your previously submitted application (project 1020253) to change the proposed emission factor for the plenum from 0.48 lb/bale to 0.741 lb/bale. Doing so will allow emission reductions down to 0.741 lb/bale to be enforceable, as the issued Authority to Construct will be converted to a Permit to Operate upon issuance. Then in the future, you may choose to perform a source test and lower the emission limit further and apply to bank those reductions providing compliance with the lower emission limits has been demonstrated.

In response, please refer to the above project number, and send to the attention of Mr. Steve Tomlin.

Please submit the requested information within 90 days. The District will not be able to process your application until this information is received. Please note that the District's Small Business Assistance Office is available to all applicants. If you would like our SBA office's assistance in responding to this letter, please contact them at (661) 326-6969.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Steve Tomlin of Permit Services at (661) 326-6968.

Sincerely,

Seyed Sadredin
Director of Permit Services

Leonard Scordino
for Thomas E. Goff, P.E.
Permit Services Manager

svt

KARL M. SMITH, INC.

1204 DAIRY AVE.–P.O. BOX 817–CORCORAN, CALIF. 93212–PH. (559)992-4109
Contractor License 492835

SJVAPCD
2700 M. Street, Suite 275
Bakersfield, Ca 93301-2370

To Whom It May Concern:

Visaila Cooperative Gin is submitting the following ERC application for permit S-516-1-2.
The applicant has replaced all 2D-2D cyclone collectors and screen house with 1D-3D cyclones. Trash from feeders and lint cleaner robber will be handled with conveyors therefore there will be no emissions from these system.

Also we would like to add there is an error on emission factor's for project #101068, 1010300 and a source test that did not meet requirements that will have an effect on final ERC.

Sincerely,

Victor Gamez Jr
Karl M. Smith, Inc.

Five year bale production

Year	Bales
2000	20,571
1999	17,193
1998	8,949
1997	17,868
1996	24,073

Last two years

2000 20,571

1999 17,193

Two year average 18,882.2

Current lbs. pm^{10}/bale 1.75

Post modification lbs. pm^{10}/bale .79

Post modification (ARE) lbs. pm^{10}/bale .96

.96 lbs. pm^{10}/balex18,882.2=18,126.9 lbs. pm^{10}/year-10% banking = 16,314.3 lbs. pm^{10}

S-1842-4

San Joaquin Valley Air Pollution Control District

RECEIVED

MAR 20 2002

SAN JOAQUIN VALLEY UNIFIED APCD-SOUTHERN REGION

Application for

[X] EMISSION REDUCTION CREDIT (ERC) [ ] ERC WITHDRAWAL
[ ] CONSOLIDATION OF ERC CERTIFICATES [ ] ERC TRANSFER OF OWNERSHIP

1. ERC TO BE ISSUED TO: Visalia Cooperative Cotton Gin

2. MAILING ADDRESS:
Street/P.O. Box: P.O. Box 1208
City: Visalia State: Ca Zip Code: 93279

3. LOCATION OF REDUCTION:
Street: Road 33580
City: Visalia Ca 93279

4. DATE OF REDUCTION: 10/6/2001

5. PERMIT NO(S): EXISTING ERC NO(S):

6. METHOD RESULTING IN EMISSION REDUCTION:
[ ] SHUTDOWN [X] RETROFIT [ ] PROCESS CHANGE [ ] OTHER
DESCRIPTION:
See attached
(Use additional sheets if necessary)

7. REQUESTED ERCs (In Pounds Per Calendar Quarter):

	VOC	NOx	CO	PM10	SOx	OTHER
1ST QUARTER						
2ND QUARTER						
3RD QUARTER						
4TH QUARTER				16,314.3		

8. FOR ERC T/O APPLICATIONS ONLY, LIST THE COST OF ERCs PROPOSED TO BE USED AS OFFSETS, (In Dollars Per Ton) :
VOC: _____ CO: _____ SOx: _____
NOx: _____ PM10: _____ Other: _____
(Use additional sheets if necessary)

9. SIGNATURE OF APPLICANT: D.L. Gallian TYPE OR PRINT TITLE OF APPLICANT: MANAGER

10. TYPE OR PRINT NAME OF APPLICANT: Larry Gallian DATE: 3-20-02 TELEPHONE NO: 559-732-1365

FOR APCD USE ONLY

RECEIVED
DATE STAMP
MAR 21 2002
SAN JOAQUIN VALLEY UNIFIED
APCD-SOUTHERN REGION

FILING FEE RECEIVED: $ 650.- Pm 3/20 CK
DATE PAID: 3/21/02
PROJECT NO.: 1020219 FACILITY ID.: S-516 Permit

SAN JOAQUIN VALLEY
UNIFIED APCD
2700 M Street, Suite 275
Bakersfield, CA 93301-2370

CASH RECEIPT

202105

Date 3/20 20 07.

Received From Visalia Coop

Address

Dollars $ 650.00

For SJPC Prop

ACCOUNT			HOW PAID			
AMT. OF ACCOUNT			CASH			
AMT. PAID			CHECK	3500	-150	
BALANCE DUE			MONEY ORDER			

By N Sanchez

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT
SUPPLEMENTAL APPLICATION FORM

COTTON GINS
Emission Reduction Credit (ERC)

(This form must be accompanied by a completed Application for Emission Reduction Credit form.)

Certificate to be Issued to: Visalia Cooperative Cotton Gin
Gin Location: Rd 33580 Visalia, Ca 93279

1. Are the emission reductions due to the installation of control equipment at an existing cotton gin? yes

   If "yes", please list the Authority(-ies) to Construct authorizing the installation: _____

2. Are the emission reductions due to the shut-down of a cotton gin? no

   If "yes", please list the applicable Permit to Operate number(s): _____

3. What date did the emission reductions occur? (i.e., if #1 applies, when was the gin first operated after control equipment was installed? If #2 applies, when was the gin last operated, or when was the Permit to Operate surrendered?

   MM/DD/YY: 10 / 06 / 2001

4. Submit operational data for the five consecutive seasons prior to the reduction (if the emission reductions are result of the installation of control equipment, submit for the five years prior to the issuance of the applicable ATC):

Season	1996	1997	1998	1999	1900
Start MM/DD/YY	10/2/96	9/18/97	10/19/98	10/4/99	9/25/00
End MM/DD/YY	12/23/96	12/22/97	12/21/98	11/22/99	12/4/00
No. of Bales	24,073	17,868	8,949	17,193	25,071

(Please continue on other side)

5. Provide emission factors (EF) in pounds of PM_{10} emissions per 500 pound bale:

System	Pre-mod or Pre-shutdown EF	Post-mod EF*	References
Unloading #1/#2	.71 /	.16 /	Plenum
Pre-Cln. #1/#2/#3	.29 / .21 /	.14 / .12 /	Plenum
Overflow	.04	.04	Plenum
Lint Cln. #1/#2/#3	.41 / /	.21 / /	Source Test Result
Battery Condenser	.03	.03	
Trash			
Motes	.25	.07	Source Test Result
Motes Trash	.02	.02	Plenum
Other Gin Stand / Feeder Trash	.04	0	
Other Lint Trash / Bale	.24	0	
Totals	1.74	.79	

* This column is for the addition of control equipment only - do not use if the emission reductions are the result of a shut-down.

APPLICATION REVIEW
EMISSION REDUCTION CREDIT BANKING

Facility Name:	Visalia Cooperative Cotton Gin
Mailing Address:	P.O. Box 1208 Visalia, CA 93279
Contact Name:	Larry Gallian, Manager
Telephone:	(559) 732-1365
Engineer:	Steve Tomlin, Senior Air Quality Engineer
Date:	February 3, 2003
Lead Engineer:	Leonard Scandura, Supervising AQE
Date:	2/10/03
Facility:	S-516
Permit Numbers:	S-516-1
ERC Certificate #s:	S-1842-4
Date Received:	March 20, 2002
Date Complete:	July 31, 2002

I. SUMMARY

Visalia Cooperative Cotton Gin (Visalia Coop) has applied for Emission Reduction Credits (ERCs) for the replacement of all 2D-2D cyclones with 1D-3D cyclones and installation of a plenum chamber serving 10 of the new cyclones.

The following emission reductions have been found to qualify for banking:

	Total Creditable Reductions Qualified for Banking (lb)
PM10	**17,480 lb**

II. APPLICABLE RULES

Rule 2201 New and Modified Stationary Source Review Rule (April 25, 2002)

Rule 2301 Emission Reduction Credit Banking (December 17, 1992)

III. PROJECT LOCATION

The Visalia Cooperative Cotton Gin is located near the intersection of Road 132 and Avenue 336 near Visalia California.

IV. METHOD OF GENERATING REDUCTIONS

Visalia Coop has applied for Emission Reduction Credits (ERCs) for the replacement of all 2D-2D cyclones with 1D-3D cyclones and installation of a plenum chamber serving 10 of the new cyclones.

This gin is a saw type gin receiving seed cotton through a telescope suction unloading system. The seed cotton is then sent to the precleaning system for the removal of gin trash. Next, the seed cotton is sent to the saw gin stands for removal of the lint cotton from the seed. The lint cotton is then sent to the press to be baled.

Major Cotton Ginning Equipment
One telescope suction unloading system
Two 5 MMBtu/hr tower dryers
Two incline cleaners
One stick machine
One overflow separator
Five saw gin stands and feeders
Ten lint cleaners
One battery condenser
One lint slide
One bale press
One sampler unit
One mote cleaner
One mote press
One 2 MMBtu/hr humidifier unit

Pre-Modification Air Pollution Control Equipment (PTO S-516-1-1)

Operation Serving	Quantity	Size	Control Equipment Type
Unloading (Telescope)	4	38"	2D2D Cyclone
	1	46"	2D2D Cyclone
#1 dryer/cleaner	6	36"	2D2D Cyclone
#2 dryer/cleaner	3	36"	2D2D Cyclone
	3	38"	2D2D Cyclone
Gin stand/feeder trash	2	36"	2D2D Cyclone
Overflow system	2	36"	2D2D Cyclone
Lint cleaner	1		Screen House
Lint trash/robber	1	46"	2D2D Cyclone
Mote system	1	60"	2D2D Cyclone
	1	48"	2D2D Cyclone
	1	28"	2D2D Cyclone
Mote cleaner trash system	1	28"	2D2D Cyclone
Battery condenser	3	72"	1D3D Cyclone

Post-Modification Air Pollution Control Equipment (PTO S-516-1-4)

Operation Serving	Quantity	Size	Control Equipment Type
Unloading (Telescope), #1 dryer/cleaner, #2 dryer/cleaner, overflow system	10	48"	1D3D Cyclone
Gin stand/feeder trash, lint cleaner, lint trash/robber	5	72"	1D3D Cyclone
Mote system	2	54"	1D3D Cyclone
	1	36"	1D3D Cyclone
Battery condenser	3	72"	1D3D Cyclone

Equipment description and conditions for the subject permits are included in Appendix A.

V. CALCULATIONS

A. Assumptions and Emission factors

Except as specified in the tables below, the pre-project and post-project emission factors are from "Cotton Gin Emission Factor Handbook," California Cotton Ginners Association (CCGA), June 2000 for saw gin type. The pre-project total emission factor is 1.83 lb PM10/bale. The post-project total emission factor is 0.77 lb PM10/bale. Copies of the tables used from CCGA handbook are included in Appendix B.

Pre-Modification Emission Factors (established in Project 1010168)

System	Control	Average Emission Factor	
Unloading	2D2D	0.21	lb PM_{10}/bale
#1 Precleaning	2D2D	0.29	lb PM_{10}/bale
#2 Precleaning	2D2D	0.21	lb PM_{10}/bale
Overflow	2D2D	0.04	lb PM_{10}/bale
Gin Stand/Feeder Trash	2D2D	0.04	lb PM_{10}/bale
Lint Cleaning	Screen House	0.41*	lb PM_{10}/bale
Lint Trash/Robber	2D2D	0.24	lb PM_{10}/bale
Motes	2D2D	0.25	lb PM_{10}/bale
Motes Cleaner Trash	2D2D	0.02	lb PM_{10}/bale
Battery Condenser	1D3D	0.03	lb PM_{10}/bale
Stockpiler	2D2D	0.09	lb PM_{10}/bale
Total average emission Factor		**1.83**	**lb PM_{10}/bale**

* Applicant factor, conservative for a pre-project factor from an ERC banking perspective as it is lower than standard CCGA factor of 0.78 lb PM_{10}/bale

Post-Modification Emission Factors

System	Control	Proposed Emission Factor	
Unloading	1D3D	0.48	lb PM_{10}/bale
#1 Precleaning	1D3D		lb PM_{10}/bale
#2 Precleaning	1D3D		lb PM_{10}/bale
Overflow	1D3D		lb PM_{10}/bale
Gin Stand/Feeder Trash	1D3D	0.17	lb PM_{10}/bale
Lint Cleaning	1D3D		lb PM_{10}/bale
Lint Trash/Robber	1D3D		lb PM_{10}/bale
Motes	1D3D	0.07	lb PM_{10}/bale
Motes Cleaner Trash	1D3D	0.02	lb PM_{10}/bale
Battery Condenser	1D3D	0.03	lb PM_{10}/bale
Total Proposed Emission Factor		**0.77**	**lb PM_{10}/bale**

Visalia Coop Gin is a seasonal source, typically operating September through December. Rule 2201 defines a seasonal source as a stationary source with more than 90% of its annual emissions occurring within a consecutive 120-day period. During the baseline period (see below) 98% of Visalia Coop Gin's annual emissions occurred during the period October 1 through December 31 (92 days). Therefore, Visalia Coop Gin is a seasonal source.

Actual Emission Reductions (AER) from a seasonal source are determined for the season only. In order to fit the AER into standard quarterly format of the District's ERC's, the AER will be allocated on a calendar quarter basis using the fraction of the historical emissions occurring during each quarter.

B. Baseline Period Determination and Data

Visalia Coop Cotton Gin received Authority to Construct (ATC) S-516-1-2 on April 26, 2001 to replace screen baskets and thirty 2D2D cyclones with a plenum chamber and twenty-one 1D3D cyclones. The date the facility first operated with the new control equipment was October 6, 2001.

After replacing the air pollution control equipment, Visalia Coop Cotton Gin performed a compliance source test on representative cyclones serving three systems: lint cleaner, plenum, and motes system. The lint cleaner and motes systems source tested at below permit limits. However, source tests results indicated PM10 emissions from the plenum cyclones exceeded the permit limit. Source test values were 0.741 lb/bale, as compared to the ATC permit limit of 0.34 lb/bale. Visalia Coop indicates some plugging of the cyclones occurred during the season, and this produced the higher emission rate. Visalia Coop then submitted an application and received ATC S-516-1-3 on August 21, 2002 to raise the emission limit for the plenum chamber from 0.34 lb/bale to the source test level of 0.741 lb/bale. Since compliance with this new ATC had been established using the previously performed source test, the ATC was implemented and converted into a Permit to Operate on September 10, 2002.

Visalia Coop submitted another application and received ATC S-516-1-4 on December 12, 2002 to lower the plenum chamber emission factor to 0.48 lb/bale, and reduce the annual production limit from 72,000 bales to 25,000 bales. Visalia Coop believed that the lower plenum limit of 0.48 lb/bale could be met since the plugging problems discovered at the end of the last season were resolved. The reduction in annual production limit to 25,000 bales as proposed to allow more emission reductions to qualify for banking. Visalia Coop performed a source test on October 16, 2002 and documented compliance with lower emission rate. The ATC was converted into a Permit to Operate on January 30, 2003.

To establish the appropriate baseline period to be used in determining the emissions reduction resulting from the replacement of air pollution control equipment, pursuant to Rule 2201 subsection 3.7.1, seasonal production data will be analyzed for the two consecutive years of operation immediately prior to the submission of the complete application. The replacement of air pollution control equipment was constructed under ATC S-516-1-2, which was deemed complete on April 12, 2001. The production data for the two consecutive years of operation immediately prior to the submission of the complete application is summarized in the following table.

	No. of 500 lb standard bales ginned
Year	
1999	17,193
2000	25,071

C. Historical Actual Emissions

The historical production data is multiplied by the pre-project permit limit of 1.83 lb PM10/bale to obtain the Historical Actual Emissions (HAE).

	Historical Actual Emissions
1999 PM10	17,193 x 1.83 = 31,463 lb
2000 PM10	25,071 x 1.83 = 45,880 lb
Average Emissions	**38,672 lb**

D. Actual Emission Reductions (AER)

AER = HAE - PE

	Actual Emission Reductions (AER)
HAE	38,672 lb
PE	19,250 lb
AER	**19,422 lb**

E. Air Quality Improvement Deduction

	Air Quality Improvement Deduction (10% of AER, lb/qtr)
PM10	1,942

F. Increases in Permitted Emissions (IPE)

No IPE associated with this project.

G. Bankable Emissions Reductions Credits

	Total Creditable Reductions Qualified for Banking (lb)
PM10	17,480 lb

VI. COMPLIANCE

To be eligible for banking, emission reduction credits (ERC's) must be verified as being real, surplus, permanent, quantifiable, and enforceable pursuant to District Rules 2201 and 2301. In addition the application must be submitted within the timelines specified in Rule 2301.

A. Real

Visalia Coop Gin has installed more efficient emission control equipment which has reduced emissions. The AERs quantified above were based on actual, historical emissions and were calculated from actual production data and District recognized emission factors from the stationary source. The lower emission rates were validated by compliance source testing. Therefore, the reductions are real.

B. Enforceable

Authorities to Construct S-516-1-2, -1-3, and -1-4 have been implemented into Permit to Operate S-516-1-4 (See Appendix A). The current permit contains limits for the amount of bales processed per day and per year, and emission limits in PM10/bale, thereby limiting the potential to emit. Additional modifications to the process may not take place without Authority to Construct in compliance with the provisions of New and Modified Stationary Source Review (Rule 2201). Therefore the reductions are enforceable.

C. Quantifiable

The AERs were calculated using District recognized emission factors based on source testing of cotton gins in the San Joaquin Valley and actual historical production data. Therefore, the reductions are quantifiable.

D. Permanent

The replacement of screen baskets and 2D2D cyclones with a plenum chamber and 1D3D cyclones is a permanent modification to the cotton gin. Because the emission reductions result from addition of control equipment and not from shutdown of equipment, historical actual emissions from this cotton gin will not be shifted to another cotton gin. Therefore, the reductions are permanent.

E. Surplus

The replacement of screen baskets and 2D2D cyclones with a plenum chamber and 1D3D cyclones was voluntary. The resulting emission reductions are not mandated by any law, rule, regulation, agreement, or order of the District, State, or Federal Government. The reductions are not attributed to a control measure noticed for workshop or proposed, nor contained in a State Implementation Plan. Therefore, the reductions are surplus.

To determine whether the reductions were surplus with respect to Rule 4202 (Particulate Matter – Emission Rate), actual emission rates will be compared to limits in the rule. The process rate in a cotton gin varies from emission point to emission point as the trash and seeds are removed from the lint, decreasing the weight. The rate starts at 1,500 lb of seed cotton per bale of finished cotton and drops to about 500 lb of lint cotton per bale of finished cotton. Approximately 750 lb of seed is removed per bale, and approximately 150 lb of trash is removed per bale, with remaining 100 lb removed as moisture, lint and motes through the finishing stages.

The lowest pre-modification process weight rate at the #1 Lint Cleaner is approximately:

$E = 3.59*P^{0.62}$ where:

P= process weight in tons/hr =
= (600 bales/day) x [(1500 lb/bale - 500 lb(seed)/bale – 400lb (trash)/bale)] x 1 ton/2,000 lb / (24 hr/day)
= 7.5 tph

$E = 3.59(7.5^{0.62}) = 12.5$ lb PM/hr

C. Quantifiable

The AERs were calculated using District recognized emission factors based on source testing of cotton gins in the San Joaquin Valley and actual historical production data. Therefore, the reductions are quantifiable.

revised 4-24-03 SVT

D. Permanent

The replacement of screen baskets and 2D2D cyclones with a plenum chamber and 1D3D cyclones is a permanent modification to the cotton gin. Because the emission reductions result from addition of control equipment and not from shutdown of equipment, historical actual emissions from this cotton gin will not be shifted to another cotton gin. Therefore, the reductions are permanent.

E. Surplus

The replacement of screen baskets and 2D2D cyclones with a plenum chamber and 1D3D cyclones was voluntary. The resulting emission reductions are not mandated by any law, rule, regulation, agreement, or order of the District, State, or Federal Government. The reductions are not attributed to a control measure noticed for workshop or proposed, nor contained in a State Implementation Plan. Therefore, the reductions are surplus.

To determine whether the reductions were surplus with respect to Rule 4202 (Particulate Matter – Emission Rate), actual emission rates will be compared to limits in the rule. The process rate in a cotton gin varies from emission point to emission point as the trash and seeds are removed from the lint, decreasing the weight. The rate starts at 1,500 lb of seed cotton per bale of finished cotton and drops to about 500 lb of lint cotton per bale of finished cotton. Approximately 500 lb of seed is removed per bale, and approximately 400 lb of trash is removed per bale, with remaining 100 lb removed as lint and motes through the finishing stages.

The lowest pre-modification process weight rate at the #1 Lint Cleaner is approximately:

$E = 3.59*P^{0.62}$ where:

P = process weight in tons/hr =
= (600 bales/day) x [(1500 lb/bale - 500 lb(seed)/bale – 400lb (trash)/bale)] x 1 ton/2,000 lb / (24 hr/day)
= 7.5 tph

$E = 3.59(7.5^{0.62}) = 12.5$ lb PM/hr

The highest emitting pre-modification source operation is the #1 Lint Cleaner (after seed and trash are removed). Emissions are 0.41 lb PM10/bale times 600 bales per day dividing by 24 hours per day yields 10.3 lb PM10/hr. All other source operations emit less. Therefore, compliance with this rule pre-modification is validated.

The lowest post-modification process rate weight for source operations discharging to the plenum is the #2 Precleaning Operation (only trash removed at this point).

P= process weight in tons/hr =
= (600 bales/day) x [(1500 lb/bale - 400lb(trash)/bale)] x 1 ton/2,000 lb / (24 hr/day)
= 13.8 tph

$E = 3.59(13.8^{0.62}) = 18.2$ lb PM/hr

The highest emitting post-modification source operation is the plenum chamber. Emissions are 0.48 lb PM10/bale times 600 bales per day dividing by 24 hours per day yields 12.0 lb PM10/hr. All other post-modification source operations emit less. Therefore, compliance with rule post-modification is also validated.

F. Timeliness

On October 6, 2001, the cotton gin commenced operation with the new control equipment installed. The application for ERC was received by the District on March 20, 2002, within 180 days of the October 6, 2001. Pursuant to Rule 2301, Section 4.2.3, an application for ERC must be filed no later than 180 days after the emission reductions have occurred. Because the ERC application was filed no later than 180 days after the commencing date, the application is timely.

VII. RECOMMENDATION

After public notice, comments and review, issue ERC Banking Certificate S-1842-4 to Visalia Cooperative Cotton Gin for the following amounts of PM10:

ERC	1st QTR	2nd QTR	3rd QTR	4th QTR
S-1842-4	0	0	350	17,130

Note: Visalia Coop Gin is a seasonal source. Actual emission reductions from a seasonal source are allocated on a calendar quarter basis using the fraction of the historical emissions occurring during each quarter. During the baseline period, approximately 2% of the total seasonal emissions occurred in the 3rd quarter, and 98% occurred in the 4th quarter. Therefore, 2% of the seasonal AER is allocated to the 3rd quarter, and 98% is allocated to the 4th quarter.

Appendix A

Permit to Operate Information

Pre-Modification Permit to Operate S-516-1-1

Equipment Description: COTTON GIN WITH TWO 5.0 MMBTU/HR AND ONE 2.0 MMBTU/HR GAS-FIRED BURNERS

1. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] N

2. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] N

3. Air pollution control equipment shall be in good operating condition and operate in accordance with the manufacturer's recommendations at all times when process equipment is in operation. [District Rule 1080] N

4. Fugitive dust emissions resulting from vehicular traffic shall be effectively controlled by the following methods: paving, watering, or treating with a dust-reducing compound approved by the District. [District Rule 4102] N

5. Facility grounds shall be free of accumulations of trash and spilled cotton. [District Rule 4102] N

6. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100] N

7. Daily ginning rate shall not exceed 150 tons of baled cotton per day (equivalent to 600 five hundred pound bales per day). [District Rule 2201] N

8. Ginning rate shall not exceed 18,000 tons of baled cotton per season (equivalent to 72,000 five hundred pound bales per season). [District Rule 2201] N

9. Emissions of PM-10 shall not exceed 7.32 pounds per ton of baled cotton (equivalent of 1.83 pounds per each 500 pound bale). [District Rule 2201] N

10. Permittee shall maintain daily records specifying the following: a) date, b) number of bales of cotton produced, c) weight of bales produced, and d) volume of natural gas and propane burned. [District Rule 1070] N

11. Permittee shall maintain the records of operating schedule including: start-up date, last day of operation, hours per day of operation, days per season of operation, weight of cotton baled, and annual quantities of natural gas and propane burned. [District Rule 1070] N

12. Records shall be maintained for a period of at least five years and made readily available for District inspection upon request. [District Rule 1070] N

Post-Modification Permit to Operate S-516-1-4

Equipment Description: COTTON GIN WITH TWO 5.0 MMBTU/HR AND ONE 2.0 MMBTU/HR GAS-FIRED BURNERS

1. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] N

2. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] N

3. Operation shall include plenum chamber with ten (10) 48" 1D3D cyclones serving the unloading (telescope), #1 dryer/cleaner, #2 dryer/cleaner, and overflow systems. [District Rule 2201] N

4. Operation shall include lint cotton handling system , including, five gin stands, five feeders, ten lint cleaners, and five 72" 1D3D cyclones. [District Rule 2201] N

5. Operation shall include one motes cleaning system, including: one motes served by two 54" 1D3D cyclones and one motes cleaner served by one 36" 1D3D cyclone. [District Rule 2201] N

6. Operation shall include one battery condenser system, including : one battery condenser, one lint slide, one sampler, one bale press, and three (3) 72" 1D3D cyclones. [District Rule 2201] N

7. Air pollution control equipment shall be in good operating condition and operate in accordance with the manufacturer's recommendations at all times when process equipment is in operation. [District Rule 1080] N

8. Fugitive dust emissions resulting from vehicular traffic shall be effectively controlled by the following methods: paving, watering, or treating with a dust-reducing compound approved by the District. [District Rule 4102] N

9. Facility grounds shall be free of accumulations of trash and spilled cotton. [District Rule 4102] N

10. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100] N

11. When firing on natural gas, emission from burners shall not exceed: 0.1 lb-NOx/MMBtu; 0.02 lb-CO/MMBtu; 0.0076 lb-PM10/MMBtu; 0.003 lb-SOx/MMBtu or 0.006 lb-VOC/MMBtu. [District Rule 2201] N

12. Daily ginning rate shall not exceed 150 tons of baled cotton per day (equivalent to 600 five hundred pound bales per day). [District Rule 2201] N

13. Ginning rate shall not exceed 6,250 tons of baled cotton per season (equivalent to 25,000 five hundred pound bales per season). [District Rule 2201] N

14. Total gin emissions of PM10 shall not exceed 3.08 pounds per ton of baled cotton (equivalent of 0.77 pounds per each 500 pound bale). [District Rule 2201] N

15. Emissions of PM10 from the unloading (telescope), #1 dryer/cleaner, #2 dryer/cleaner, and overflow system served by the ten 48 inch diameter 1D3D cyclones at the plenum chamber shall not exceed 0.48 lb/bale. [District Rule 2201] N

16. Emissions of PM10 from the lint cleaning, lint trash/robber, and gin stand feeder trash served by the five 72 inch diameter 1D3D cyclones shall not exceed 0.17 lb/bale. [District Rule 2201] N

17. Emissions of PM10 from the motes cleaner served by one 36 inch diameter 1D3D cyclone and the motes served by two 54 inch diameter 1D3D cyclones shall not exceed 0.02 lb/bale and 0.07 lb/bale, respectively. [District Rule 2201] N

18. Emissions of PM10 from the Battery Condenser served by three 72 inch diameter 1D3D cyclones shall not exceed 0.03 lb/bale. [District Rule 2201] N

19. Permittee shall maintain daily records specifying the following: a) date, b) number of bales of cotton produced, c) weight of bales produced, and d) volume of natural gas and propane burned. [District Rule 1070] N

20. Permittee shall maintain the records of operating schedule including: start-up date, last day of operation, hours per day of operation, days per season of operation, weight of cotton baled, and annual quantities of natural gas and propane burned. [District Rule 1070] N

21. Records shall be maintained for a period of at least five years and made readily available for District inspection upon request. [District Rule 1070] N

Appendix B

Tables of Emission Factors from Cotton Gin Emission Factor Handbook

GIN TYPE: *SAW*			
CONTROL: *1D-3D*			
	EMISSIONS (lb PM_{10} /bale)		
SYSTEM	AVG.	+S.D.	- S.D.
Unloading	.11	.16	.06
#1 Precleaning	.11	.14	.09
#2 Precleaning	.08	.12	.04
#3 Precleaning	.09	.18	.00
Overflow	.04	.06	.01
Gin Stand/Feeder Trash	.09	.12	.05
#1 Lint Cleaning [1]	.10	.10	.10
#2 Lint Cleaning [1]	.03	.03	.03
Lint Cleaning [2]	.11	.17	.05
Lint Trash/Robber	.07	.09	.05
Battery Condenser	.03	.07	.01
Motes	.07	.12	.02
Motes Cleaner Trash	.02	.02	.02
Stockpiler	.09	.12	.06
TOTAL [3]	0.91	1.37	0.45

[1] Use when lint cleaner condenser fan is pulling from a single stage of condensers
[2] Use when lint cleaner condenser fan is pulling from both 1st and 2nd stage condensers
[3] Assumes total "lint cleaning" emission factor instead of individual stages

GIN TYPE: *ROLLER*			
CONTROL: *1D-3D*			
	EMISSIONS (lb PM_{10} /bale)		
SYSTEM	AVG.	+S.D.	- S.D.
Unloading	.23	.30	.16
#1 Precleaning	.24	.42	.06
#2 Precleaning	.14	.14	.14
#3 Precleaning	.19	.28	.13
Overflow	.03	.03	.03
Gin Stand/Feeder Trash	.04	.06	.03
#1 Lint Cleaning [1]	.02	.03	.01
#2 Lint Cleaning [1]	.04	.05	.03
Lint Cleaning [2]	.05	.08	.02
Lint Trash/Robber	.03	.04	.02
Battery Condenser	.07	.10	.05
Motes	N/A	N/A	N/A
Motes Cleaner Trash	N/A	N/A	N/A
Stockpiler	.06	.06	.06
TOTAL [3]	1.08	1.49	0.7

[1] Use when lint cleaner condenser fan is pulling from a single stage of condensers
[2] Use when lint cleaner condenser fan is pulling from both 1st and 2nd stage condensers
[3] Assumes total "lint cleaning" emission factor instead of individual stages

From "Cotton Gin Emission Factors Handbook", California Cotton Ginners Association, various revisions

GIN TYPE: *SAW*			
CONTROL: *SCREEN BASKET*			
	EMISSIONS (lb PM_{10} /bale)		
SYSTEM	AVG.	+S.D.	- S.D.
Unloading	N/A	N/A	N/A
#1 Precleaning	N/A	N/A	N/A
#2 Precleaning	N/A	N/A	N/A
#3 Precleaning	N/A	N/A	N/A
Overflow	N/A	N/A	N/A
Gin Stand/Feeder Trash	N/A	N/A	N/A
#1 Lint Cleaning [1]	.48	.48	.48
#2 Lint Cleaning [1]	.30	.30	.30
Lint Cleaning [2]	.78	.78	.78
Lint Trash/Robber	N/A	N/A	N/A
Battery Condenser	.17	.17	.17
Motes	N/A	N/A	N/A
Motes Cleaner Trash	N/A	N/A	N/A
Stockpiler	N/A	N/A	N/A
TOTAL [3]	0.95	0.95	0.95

1 Use when lint cleaner condenser fan is pulling from a single stage of condensers
2 Use when lint cleaner condenser fan is pulling from both 1st and 2nd stage condensers
3 Assumes total "lint cleaning" emission factor instead of individual stages

GIN TYPE: *ROLLER*			
CONTROL: *SCREEN BASKET*			
	EMISSIONS (lb PM_{10} /bale)		
SYSTEM	AVG.	+S.D.	- S.D.
Unloading	N/A	N/A	N/A
#1 Precleaning	N/A	N/A	N/A
#2 Precleaning	N/A	N/A	N/A
#3 Precleaning	N/A	N/A	N/A
Overflow	N/A	N/A	N/A
Gin Stand/Feeder Trash	N/A	N/A	N/A
#1 Lint Cleaning [1]	N/A	N/A	N/A
#2 Lint Cleaning [1]	N/A	N/A	N/A
Lint Cleaning [2]	N/A	N/A	N/A
Lint Trash/Robber	N/A	N/A	N/A
Battery Condenser	N/A	N/A	N/A
Motes	N/A	N/A	N/A
Motes Cleaner Trash	N/A	N/A	N/A
Stockpiler	N/A	N/A	N/A
TOTAL [3]	0	0	0

1 Use when lint cleaner condenser fan is pulling from a single stage of condensers
2 Use when lint cleaner condenser fan is pulling from both 1st and 2nd stage condensers
3 Assumes total "lint cleaning" emission factor instead of individual stages

October 13, 1998 Page 4

From "Cotton Gin Emission Factors Handbook", California Cotton Ginners Association, various revisions

GIN TYPE: *SAW*			
CONTROL: *2D-2D*			
	EMISSIONS (lb PM_{10} /bale)		
SYSTEM	**AVG.**	**+S.D.**	**- S.D.**
Unloading	.21	.23	.18
#1 Precleaning	.29	.54	.05
#2 Precleaning	.21	.41	.00
#3 Precleaning	.12	.16	.08
Overflow	.04	.04	.04
Gin Stand/Feeder Trash	.04	.04	.04
#1 Lint Cleaning [1]	N/A	N/A	N/A
#2 Lint Cleaning [1]	N/A	N/A	N/A
Lint Cleaning [2]	.73	.73	.73
Lint Trash/Robber	.24	.24	.24
Battery Condenser	N/A	N/A	N/A
Motes	.25	.40	.10
Motes Cleaner Trash	.02	.02	.02
Stockpiler	.09	.09	.09
TOTAL [3]	2.24	2.9	1.57

[1] Use when lint cleaner condenser fan is pulling from a single stage of condensers
[2] Use when lint cleaner condenser fan is pulling from both 1st and 2nd stage condensers
[3] Assumes total "lint cleaning" emission factor instead of individual stages

GIN TYPE: *ROLLER*			
CONTROL: *2D-2D*			
	EMISSIONS (lb PM_{10} /bale)		
SYSTEM	**AVG.**	**+S.D.**	**- S.D.**
Unloading	0.06	0.06	0.06
#1 Precleaning	0.23	0.23	0.23
#2 Precleaning	N/A	N/A	N/A
#3 Precleaning	N/A	N/A	N/A
Overflow	N/A	N/A	N/A
Gin Stand/Feeder Trash	N/A	N/A	N/A
#1 Lint Cleaning [1]	N/A	N/A	N/A
#2 Lint Cleaning [1]	N/A	N/A	N/A
Lint Cleaning [2]	N/A	N/A	N/A
Lint Trash/Robber	N/A	N/A	N/A
Battery Condenser	N/A	N/A	N/A
Motes	N/A	N/A	N/A
Motes Cleaner Trash	N/A	N/A	N/A
Stockpiler	N/A	N/A	N/A
TOTAL [3]	N/A	N/A	N/A

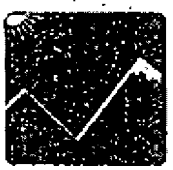
[1] Use when lint cleaner condenser fan is pulling from a single stage of condensers
[2] Use when lint cleaner condenser fan is pulling from both 1st and 2nd stage condensers
[3] Assumes total "lint cleaning" emission factor instead of individual stages

June 23, 2000 Page 5

From "Cotton Gin Emission Factors Handbook", California Cotton Ginners Association, various revisions

Appendix C

Source Test Summaries



Compliance Source Test Review

Company: Visalia Cotton Gin Co-Op Date 9/5-7.07
APCD Permit #'S: S16-1-2 Exp Date: ?? Source Test Co: Air X Tech
Contact: Dave Tilson
Equipment Numbers:
10-BD Exhaust System serving a Plenum Chamber System
Lint Cleaner and Motes

Reason For Testing - Initial ( ), Annual ( ), Rule ( ), or EPA ( ). 2201

APPLICABLE RULES - 1021 sampling; 2021 Exp Res; 8201 NSR; 2301 ERC; 4002 NESHP; 4101 visible emissions; 4201 fuels; 4701 I.C. Engines; 4703 Turbine; 4405 NOx; 4406 Sulfur; 4305 Boiler & 4351 Boiler

Pollutant	Result (lb/hr)	Limit	Result (lb/MMBTU)	Limit	Result (ppm or grain load)	Limit
PM Lint Cleaner	0.165	Avg. (0.27)lb/bale	0.170	1 (0.27)lb/bale	0.160	2 (0.27)lb/bale
PM Plenum	0.741 0.85	Avg. (0.34)lb/bale	1.015	1 (0.34)lb/bale	0.467	2 (0.34)lb/bale
PM Motes	0.063	(0.02)lb/bale		( )lb/bale		( )lb/bale
Fuel Sulfur as SO2		( )lb/hr		( )lb/MMBTU		( ) ppm @ % O2
Waste Sulfur		( )lb/hr		( )lb/MMBTU		( ) ppm @ % O2
Total Sulfur		( )lb/hr		( )lb/MMBTU		( ) ppm @ % O2
NOx		( )lb/hr		( )lb/MMBTU		( ) ppm @ % O2
CO		( )lb/hr		( )lb/MMBTU		( ) ppm @ % O2
VOC		( )lb/day		( )dest. Eff.		( ) ppm @ % O2
Relative Accuracy	NOx		CO		O2	
Ammonia Slip		( )lb/hr		( )lb/MMBTU		( ) ppm @ % O2

Source Operating Under Normal Conditions - Yes (Y) No ( )
Is Enforcement Action Necessary - Yes ( ) No (Y)
Reason For Enforcement Action: Plenum Chamber + Motes failed to comply w/ PM emission limits

Compliance Reviewed By: [signature] Date: 11/6/07

San Joaquin Valley Air Pollution Control District

SOURCE TEST RESULTS DATABASE RECORD ID **3595**

Company: **VISALIA CO-OP COTTON GIN** Date 10/16/200 Pass Fail

Permit **S-0516-0001-03** Facility 516 Unit Id: PLENUM CHAMBER (2OF10)

TEST CONDUCTED FOR THE FOLLOWING PERMIT REQUIREMENT Invalid AMS-Fail

Annual Initial CEM Retest EPA Rep AMS

Shared Pemits:

APPLICABLE RULES

2201 4001 4305 4351 4701 4703 Other

2 consec Next Test AIR-X TESTING Test AIRX101602

Equipment: COTTON GIN, PLENUM CHAMBER, LINT CLEANER & MOTES

Equip type: COTTON GIN Input Output

CONTROL EQUIPMENT

Catalyst H2O/Stm inj NH3/SCR Scrubbe Baghous FGR O2 Lo NOx

Incin Stage comb PSC PCC Rich burn Lean Cyclon DLN ESP

FUEL DATA AND OPERATIONAL DATA

Fuel F-Factor BTU: Fuel rate:

Second O2% 0 Stack 0 Process

FGR Test: FGR FGR

POLLUTANTS TESTED

PM CO NOx VOC SO2 NH3 Fuel S Waste S Other

TEST RESULTS

	lbs/hr		lbs/MMBtu		O2		
	Result	Limit	Result	Limit	Result	Limit	
PM-10	**0.4293**	0.741					gr/dsc
SO2							ppm @O2 corr.
NOx							ppm @O2 corr.
CO							ppm @O2 corr.
VOC							ppm @O2 corr.
Fuel S		%		gr/scf			ppm
NH3							ppm
							ppm @O2 corr.
							ppm @O2

CO NOx SO2 O2/CO2 VOC H2S rata:

Operation at Maximum Enforcement NOV #: Report 11/7/2002

Reason for

Review GLENN SLITOR Review 1/22/2003 Permit Exp

C/O C/O PAS____ Log Book_____ Area: 1

ERC PROJECT ROUTING FORM

PROJECT NUMBER: S-1020219 ORIGINATING FACILITY ID: S-516

NEW ERC #'s: S- 1842-4

CURRENT OWNER/APPLICANT NAME: Visalia Cooperative Cotton Gin

PRELIMINARY REVIEW	ENGR	DATE	SUPR	DATE
A. Application Deemed Incomplete	SNS	4-16-02	LMS	4/16/02
B. Application Deemed Complete	SNS	5-10-02 7-31-02	LMS	5/13/02 7/31/02
180th Day for Developmental Projects				
C. Application Pending Denial				
D. Application Denied				

ENGINEERING EVALUATION	INITIAL	DATE
E. Engineering Evaluation Complete	SNS	9-11-02 2-4-03
F. Supervising Engineer Approval	LMS	2/6/03
H. Permit Services Regional Manager Approval	S. Scott	24 Feb. 03

DIRECTOR REVIEW: [X] Not Required [ ] Required

PROJECTS REQUIRING PUBLIC NOTIFICATION

--PRELIMINARY DECISION:

_____ Date emailed to Fresno.

_____ Date of distribution to applicant, EPA, and CARB.

_____ Date of contact with EPA regarding comments on project.

_____ Date of contact with CARB regarding comments on project.

--FINAL DECISION:

_____ Date emailed to Fresno.

_____ Date of distribution to applicant, EPA, and CARB.