San Joaquin Valley
Air Pollution Control District

January 25, 2001

Duncan McCook
Anderson Clayton Corp./Oil Mill
P.O. Box 12506
Fresno, CA 93778-2506

Re: Notice of Preliminary Decision - Emission Reduction Credits
Project Number: C-1010009

Dear Mr. McCook:

Enclosed for your review and comment is the District's analysis of Anderson Clayton Corp./Oil Mill's application for Emission Reduction Credits (ERCs) resulting from for emission reductions generated by the shutdown of equipment at the Chowchilla Oil Mill (Facility ID C-41) represented by Permit Unit Requirements (PURs) C-41-5-0, C-41-6-1, C-41-7-0, C-41-8-1, C-41-9-1, C-41-12-1, C-41-15-0, C-41-16-0, and C-41-19-2, at 25184 Road 16 in Chowchilla, CA.. The quantity of ERCs proposed for banking is 327,870 lb-VOC/yr, 3,047 lb-NOx/yr, 2,792 lb-CO/yr, 79,078 lb-PM10/yr, and 49 lb-SOx/yr.

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 which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Samir Sheikh of Permit Services at (559) 230-5897.

Sincerely,

Seyed Sadredin
Director of Permit Services

SS:sqs
Enclosures
c: David Warner, Permit Services Manager

David L. Crow
Executive Director/Air Pollution Control Officer

San Joaquin Valley
Air Pollution Control District

January 25, 2001

Mike Tollstrup
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 Number: C-1010009

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Anderson Clayton Corp./Oil Mill's application for Emission Reduction Credits (ERCs) resulting from for emission reductions generated by the shutdown of equipment at the Chowchilla Oil Mill (Facility ID C-41) represented by Permit Unit Requirements (PURs) C-41-5-0, C-41-6-1, C-41-7-0, C-41-8-1, C-41-9-1, C-41-12-1, C-41-15-0, C-41-16-0, and C-41-19-2, at 25184 Road 16 in Chowchilla, CA.. The quantity of ERCs proposed for banking is 327,870 lb-VOC/yr, 3,047 lb-NOx/yr, 2,792 lb-CO/yr, 79,078 lb-PM10/yr, and 49 lb-SOx/yr.

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 which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Samir Sheikh of Permit Services at (559) 230-5897.

Sincerely,

Seyed Sadredin
Director of Permit Services

SS:sqs
Enclosure
c: David Warner, 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 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

January 25, 2001

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 Number: C-1010009

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of Anderson Clayton Corp./Oil Mill's application for Emission Reduction Credits (ERCs) resulting from for emission reductions generated by the shutdown of equipment at the Chowchilla Oil Mill (Facility ID C-41) represented by Permit Unit Requirements (PURs) C-41-5-0, C-41-6-1, C-41-7-0, C-41-8-1, C-41-9-1, C-41-12-1, C-41-15-0, C-41-16-0, and C-41-19-2, at 25184 Road 16 in Chowchilla, CA.. The quantity of ERCs proposed for banking is 327,870 lb-VOC/yr, 3,047 lb-NOx/yr, 2,792 lb-CO/yr, 79,078 lb-PM10/yr, and 49 lb-SOx/yr.

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 which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Samir Sheikh of Permit Services at (559) 230-5897.

Sincerely,

Seyed Sadredin
Director of Permit Services

SS:sqs
Enclosure
c: David Warner, Permit Services Manager

David L. Crow
Executive Director/Air Pollution Control Officer

Fresno Bee

**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 (ERCs) to Anderson Clayton Corp./Oil Mill for for emission reductions generated by the shutdown of equipment at the Chowchilla Oil Mill (Facility ID C-41) represented by Permit Unit Requirements (PURs) C-41-5-0, C-41-6-1, C-41-7-0, C-41-8-1, C-41-9-1, C-41-12-1, C-41-15-0, C-41-16-0, and C-41-19-2, at 25184 Road 16 in Chowchilla, CA.. The quantity of ERCs proposed for banking is 327,870 lb-VOC/yr, 3,047 lb-NOx/yr, 2,792 lb-CO/yr, 79,078 lb-PM10/yr, and 49 lb-SOx/yr.

The analysis of the regulatory basis for these proposed actions, Project #C-1010009, 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, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.**

ERC APPLICATION REVIEW
Project #: C-1010009

Facility Name:	Anderson Clayton Corporation
Mailing Address:	P.O. Box 12506 Fresno, CA 93778-2506
Contact Name:	Duncan McCook, Manager – Technical Services
Telephone:	(559) 446-6415
Fax:	(559) 447-4425
Engineer:	Samir Sheikh
Date:	January 24, 2001
Reviewed By:	Joven Refuerzo
Date:	
Certificate #(s):	C-398-1, C-398-2, C-398-3, C-398-4, C-398-5
Submitted:	January 3, 2000
Deemed Complete:	

I. SUMMARY:

Anderson Clayton Corp. requests emission reduction credit (ERC) banking certificates for emission reductions generated by the shutdown of equipment at the Chowchilla Oil Mill (Facility ID C-41) represented by Permit Unit Requirements (PURs) C-41-5-0, C-41-6-1, C-41-7-0, C-41-8-1, C-41-9-1, C-41-12-1, C-41-15-0, C-41-16-0, and C-41-19-2. Copies of the cancelled PURs for the shutdown equipment are presented in Attachment A. The facility will continue to operate exclusively as a cotton seed receiving and storage facility. Copies of PURs for the remaining operations at the facility are presented in Attachment I.

The applicant amended their proposal so that the most recent available emission factors were used in evaluating the emission reductions from the shutdown equipment. The following emission reductions have been found to qualify for ERC banking C-398-1, C-398-2, C-398-3, C-398-4, and C-398-5:

	VOC (pounds)	NOx (pounds)	CO (pounds)	PM10 (pounds)	SOx (pounds)
ERC No.	**C-398-1**	**C-398-2**	**C-398-3**	**C-398-4**	**C-398-5**
1st Quarter	112,929	968	887	27,222	16
2nd Quarter	104,976	811	743	25,285	13
3rd Quarter	40,935	338	310	9,864	5
4th Quarter	69,030	930	852	16,707	15

II. APPLICABLE RULES:

Rule 2201: New and Modified Stationary Source Review Rule (June 15, 1995)
Rule 2301: Emission Reduction Credit Banking (December 17, 1992)

III. PROJECT LOCATION:

Physical Location of Equipment: 25184 Road 16
Chowchilla, CA.

IV. METHOD OF GENERATING REDUCTIONS:

The Actual Emissions Reductions (AER) have been generated by the voluntary shutdown of equipment at the Chowchilla Oil Mill. Anderson Clayton Corp. has forfeited the Permit Unit Requirements for the following equipment in order to validate the emission reduction credits:

C-41-5-0: 300 Hp First Cut Delinting Operation Including 14 Linters with Associated Conveyors Served by 4 – 42" 2D-2D Cyclones, 1-30", 1-36", and 1-18" 1D-3D Cyclone.

C-41-6-1: 183 Hp Seed Cleaning Operation Including 6 Seed Cleaners, with Associated Conveyors, Served by 12 – 28", 2 – 36", and 1- 32" 2D-2D Cyclones; A Lint Collection System Including a 30 Hp Fan, A Feeder, And a Baler Served by One 46" 1D-3D Cyclone.

C-41-7-0: 888.5 Hp Second Cut Delinting Operation Including 40 Linters with Associated Conveyors Served by a Total of 17 Cyclones – 4 – 48", 4 – 54", 3 – 32", and 1 – 34" 2D-2D Cyclones; 3 – 28" and 1 – 18" 1D-3D Cyclones; and 1 Kice Cyclone.

C-41-8-1: 216 Hp Dehulling Operation Including Three Decorticators, 3 Hull Beaters, and a Tailings Beater Served by Three 44" and Three 34" 1D-3D Cyclones.

C-41-9-1: 400 Hp Hexane Recovery and Oil Extraction Unit Including a Mineral Oil Packed Tower Scrubber.

C-41-12-1: 32.0 MMBtu/hr Murray Natural Gas-Fired Boiler, with Diesel Oil Standby Capacity.

C-41-15-0: (4) 125 Ton Meal Tanks with Hoppers Served by One 20" 1D-3D Cyclone, 1 Saunco Pulsejet Model SFSB6-16-159 Baghouse with 14 Bags, 2 Rotolifts, 2 Reclaim Conveyors, 1 Bucket Elevator, 1 Tank Distribution Conveyor, and 1 Collection Conveyor. Rating: 96 Hp.

C-41-16-0: 71 Hp Truck Loadout of Meal Including (1) 20 Hp Incline Conveyor, (1) 15 Hp Distribution Conveyor, and (1) 3 Hp Baghouse Conveyor. The Exhaust System Consists of Fan with 40 Hp Motor and (1) 3 Hp Micro PULSEAIR 1F1 Baghouse with 80 Bags.

C-41-19-2: 903 Hp Cotton Seed Preparation Room: Consisting of a Flaking Mill Served by One 22" 1D-3D Cyclone, A Steam Cooker, Two Expanders, and a Collet Cooler/Dryer Served by One 60" 1D-3D Cyclone.

As required by Rules 2201 & 2301, creditable emission reductions are to be based upon historical actual emissions (HAE) quantified using process/throughput rates for the facility over the appropriate baseline period, and the use of acceptable emission factors including source test derived emission factors. The following table briefly describes the source and type of pollutants for each process including the method(s) for quantifying historical actual emissions (HAE):

Permit Unit	Pollutant(s)	Emissions Source(s)	Method of Quantifying HAE
C-41-5-0	PM-10	1D-3D and 2D-2D cyclones	Actual Seed Process Rate and District Approved Emission Factors
C-41-6-1	PM-10	1D-3D and 2D-2D cyclones	Actual Seed Process Rate and District Approved Emission Factors
C-41-7-0	PM-10	1D-3D and 2D-2D cyclones	Actual Seed Process Rate and District Approved Emission Factors
C-41-8-0	PM-10	1D-3D cyclones	Actual Seed Process Rate and District Approved Emission Factors
C-41-9-1	VOC (as Hexane)	Mineral oil scrubber used to reclaim solvent (hexane)	Actual Seed Process Rate and District Approved Emission Factor
C-41-12-1	NOx, VOC, PM10, SOx, and CO	Combustion of natural gas in 32.0 MMBtu/hr boiler	Actual Fuel Usage, Permitted Emission Factors, and Rule 4305 Emission Limit.
C-41-15-0	PM10	1D-3D cyclone and baghouse exhaust	Actual Meal Production Rate and District Approved Emission Factors
C-41-16-0	PM10	Baghouse exhaust	Actual Meal Production Rate and District Approved Emission Factors
C-41-19-2	PM10	1D-3D cyclones	Actual Seed Process Rate and District Approved Emission Factors

V. CALCULATIONS:

A. Assumptions

Calculation of HAE and the corresponding Actual Emission Reductions (AERs) is dependent on both the actual production data submitted by an applicant, and appropriate emission factors. The assumptions used to quantify the HAE for the affected permit units are described below:

- Emissions from the first cut delinting operation (permit C-41-5-0) and second cut delinting operation (permit C-41-7-0) will be calculated based on actual historical seed processing rates, the number of emissions points (cyclones), and emission factors used to calculate the potentials to emit for the permit units in Project #930468. These emission factors are based on source test results for similar cottonseed oil mills in Fresno County (see Attachment E). Actual source test data and records of measured airflow rates do not exist for the cyclones serving these operations.

- Emissions from the seed cleaning operation (permit C-41-6-1) and dehulling operation (permit C-41-8-1) will be calculated based on actual historical seed processing rates, the number of emissions points (cyclones), and AP-42 based emission factors used to calculate the current daily emissions limitations (DELs) for the permit units. These emission factors are based on source test results for similar cottonseed oil mills in Fresno County (see Attachment E). Actual source test data and records of measured airflow rates do not exist for the cyclones serving these operations.

- As discussed in Project #940442, VOC emissions from the hexane recovery and oil extraction unit, permit C-41-9-1, is dependent on the quantity of seed processed and not on the quantity of oil produced. All hexane losses from the solvent extraction unit are VOC emitted to the atmosphere, and the VOC retained in the meal are eventually emitted to the atmosphere. Therefore, the 3.67 lb-VOC/ton (seed processed) emission factor used to calculate the current DEL will be used to quantify the HAE for the operation.

- Emissions from the 32.0 MMBtu/hr natural gas-fired boiler, permit C-41-12-1, equipped with standard burners will be based on actual fuel use records and either permitted emission factors or the latest emission factors provided in AP-42, Tables 1.4-1 and 1.4-2, whichever is lower. The HAE for CO and VOC will be quantified using current permitted emission factors, whereas, the HAE for PM10 and SOx will be quantified using emission factors from AP-42. The CO emission factor on the current permit is lower than the Rule 4305 limit of 400 ppmv @ 3%O2 and will therefore be used. The HAE for NOx will be calculated using the Rule 4305 limit of 0.036 lb/MMBtu as this unit was required to be in compliance with this rule by December 16, 1999. Source test results do not exist for this unit.

- Emissions from the cotton seed preparation room, permit C-41-19-2, will be quantified by developing lb-PM10/ton emission factors based on the 600 tons/day process limit and grain loading concentrations and air flow rates for the two cyclones serving the operation. In Project #970202, a 1.23 lb-PM10/day potential to emit was calculated for the flaking mill cyclone based on a grain loading limit of 0.02 grains-TSP/dscf, air flow of 600 cfm, and a PM10/TSP ratio of 0.50. This limit is equivalent to a PM10 emission factor of ***0.0021 lbs*** per ton of seed processed (@ 600 tons/day). The 9.8 lb-PM10/day potential to emit quantified for the collet cooler/dryer cyclone in Project #980489 was based on a grain loading limit of 0.0095 grains/dscf, air flow of 10,000 cfm, and PM10/TSP ratio of 0.50. Compliance with the grain loading limit was demonstrated by source testing performed on April 29, 1998. Therefore, the 0.0095 grains/dscf limit correlates to a PM10 emission

factor of ***0.0163 lb*** per ton of seed processed. Emissions from the meal storage and handling operation, permit C-41-15-0, will be determined based on actual meal production rates and the most recent AP-42 emission factors, Table 9.9.1-2, Particulate Emission Factors for Grain Processing Facilities (5/98) (included in Attachment J). Source test results do not exist for the unit. Refer to process flow diagram in Attachment H for process description.

- Emissions from the meal truck loadout operation, permit C-41-16-0, will be determined based on actual meal throughput, and the most recent AP-42 emission factors, Table 9.9.1-2, Particulate Emission Factors for Grain Processing Facilities (5/98) (included in Attachment J). Source test results do not exist for the unit. Refer to process flow diagram in Attachment H for process description.

B. Emission Factors

PM-10 Emission Factors for Seed/Meal Processing and Handling

Permit Unit	Description	TSP EF (lb/ton per emissions pt)	PM-10 EF (lb/ton per emissions pt)	Reference
C-41-5-0	1st Cut Lint Cleaning	0.08	0.04	TSP source test information presented in Fresno County APCD document (Attachment E)
C-41-6-1	Seed Cleaning	0.012	0.006	TSP source test information presented in Fresno County APCD document (Attachment E)
C-41-7-0	2nd Cut Lint Cleaning	0.022	0.011	TSP source test information presented in Fresno County APCD document (Attachment E)
C-41-8-1	Hulling & Separation	0.098	0.049	TSP source test information presented in Fresno County APCD document (Attachment E)
C-41-15-1	Meal Storage and Handling	Receiving (tank distribution conveyers): 0.017	0.0025	AP-42, Table 9.9.1-2 (5/98)
		Receiving (storage tanks to hoppers) 0.017	0.0025	AP-42, Table 9.9.1-2 (5/98)

PM-10 Emission Factors for Seed/Meal Processing and Handling

Permit Unit	Description	TSP EF (lb/ton per emissions pt)	PM-10 EF (lb/ton per emissions pt)	Reference
C-41-16-0	Meal Truck Loadout	Loading: 0.0033	0.0008	AP-42, Table 9.9.1-2 (5/98)
C-41-19-2	Seed Preparation Room	Flaking Mill Cyclone	0.0021	Based on permitted production rate limit, and grain loading and air flow limits used to calculate the PE in project 970202
		Collet Cooler/Dryer Cyclone	0.0163	Based on permitted production rate, grain loading limit on permit, and air flow from 4/29/98 source test report.

VOC Emissions from Hexane

Permit Unit	Description	VOC Emission Factor (lb/ton of seed)	Reference
C-41-9-1	Hexane Recovery and Oil Extraction Operation	3.67	Project 940442

Combustion Emissions

Permit Unit	Description	Pollutant	Emission Factor (lb/MMBtu)	Reference
C-41-12-1	32.0 MMBtu/hr gas-fired boiler	NOx	0.036	Rule 4305 Limit
		VOC	0.0022	Current Permit
		PM10	0.0076	AP-42, Table 1.4-2
		SOx (as SO2)	0.0006	AP-42, Table 1.4-2
		CO	0.033	Current Permit

C. Baseline Period Determination and Data

Per Section 3.7.1 of Rule 2201, baseline period is defined as: a) two consecutive years of operation immediately prior to submission of the complete application; or b) another time period of at least two consecutive years within the five years immediately prior to submission of the complete application as determined by the APCO as more representative of normal operation.

Although the seed processing equipment at the Chowchilla Oil Mill is in place and operable, the facility has not processed cotton seed since 1998 (The facility is currently utilized for the temporary receipt and storage of cotton seed). Production at the facility also fluctuated season to season; therefore, the representative production period is the two consecutive years within the previous five-year period (1995 to 2000) that is more representative of normal operation. Also, periods of non-operation are not included in the calculation of baseline production and emission rates since the District does not consider such periods representative of normal operation.

Anderson Clayton proposes to use actual quarterly production data for the period from 1992 to 1998 to establish normal operation for the Chowchilla Oil Mill. Annual production data exists for prior years (see Attachment B), however, quarterly production data is not available for the facility prior to 1992. The baseline period chosen will be two consecutive year period within the last five years that most closely matches the average production rates quantified for the 1992 to 1998 period of operation. Annual production information supplied by the applicant is as follows:

Production Year	Seed Processed (tons/year)	Hexane Usage (gallons/year)	Meal Produced (tons/year)	Natural Gas Usage (Therms/year)
1992	119,784	62,002	61,796	1,022,070
1993	130,779	84,875	69,761	1,026,900
1994	130,413	?	67,363	1,201,200
1995	100,363	105,496	50,468	938,173
1996	123,888	111,992	65,885	1,114,967
1997	74,527	154,594	39,140	766,508
1998	57,137	102,007	29,948	407,158
1999	0	0	0	0
2000	0	0	0	0
Averages	105,270*	103,494**	54,909*	925,282*

**The average production and natural gas use rates are based on 7 years of operation and do not include years 1999 and 2000 since non-operation is not representative of normal operation.*

** Average annual hexane usage is based on 6 years as data could not be located for 1994. Data for 1999 and 2000 is not included since process equipment did not operate during these years.

The two consecutive year period that most closely approximates the average 105,270 tons of seed is the 1996 and 1997 operating period with an average production of 99,208 tons of seed per year. Therefore, the 1996 and 1997 production years represent the two consecutive year period during the previous five years to be the most representative of normal operation. The quarterly breakdown of production data for these years is presented below and in Attachment B.

Baseline Production Averages

	Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Seeds Processed (tons)	1996	32,500	34,547	24,773	32,068
	1997	35,844	28,987	0	9,696
Averages =		***34,172***	***31,767***	***12,387***	***20,882***
Hexane (gallons)	1996	21,161	30,525	29,511	30,795
	1997	17,230	73,895	0	63,469
Averages =		***19,196***	***52,210***	***14,756***	***47,132***
Meal Produced (tons)	1996	17,212	18,223	13,068	17,382
	1997	19,266	14,808	0	5,066
Averages =		***18,239***	***16,516***	***6,534***	***11,224***
Natural Gas (Therms)	1996	266,496	297,789	208,968	341,714
	1997	331,105	203,009	0	232,394
Averages =		***298,801***	***250,399***	***104,484***	***287,054***

D. Historical Actual Emissions

1. Seed/Meats Processing Emissions (PM_{10})

The PM_{10} HAE for seed/meats processing is calculated as follows:

(quarterly average tons seed/meats processed)(PM10 emission factor) = HAE

Permit Unit C-41-5-0, 1st Cut Lint Cleaning

	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Average Quarterly Production	34,172	31,767	12,387	20,882
PM10-EF (lb/ton/pt)	0.04	0.04	0.04	0.04
# of Emission Points (cyclones)	7	7	7	7
HAE =	9,568	8,895	3,468	5,847

Permit Unit C-41-6-1, Seed Cleaning				
	1st Quarter	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
Average Quarterly Production	34,172	31,767	12,387	20,882
PM-10 EF (lb/ton/pt)	0.006	0.006	0.006	0.006
# of Emission Points (cyclones)	16	16	16	16
HAE =	3,281	3,050	1,189	2,005

Permit Unit C-41-7-0, 1st Cut Lint Cleaning				
	1st Quarter	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
Average Quarterly Production	34,172	31,767	12,387	20,882
PM-10 EF (lb/ton/pt)	0.011	0.011	0.011	0.011
# of Emission Points (cyclones)	17	17	17	17
HAE =	6,390	5,940	2,316	3,905

Permit Unit C-41-8-1, Hulling and Separation				
	1st Quarter	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
Average Quarterly Production	34,172	31,767	12,387	20,882
PM-10 EF (lb/ton/pt)	0.049	0.049	0.049	0.049
# of Emission Points (cyclones)	6	6	6	6
HAE =	10,047	9,339	3,642	6,139

Permit Unit C-41-19-2, Seed Preparation Room				
	1st Quarter	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
Average Quarterly Production	34,172	31,767	12,387	20,882
Flaking Mill Cyclone PM-10 EF (lb/ton)	0.0021	0.0021	0.0021	0.0021
Collet Cooler/Dryer Cyclone PM-10 EF (lb/ton)	0.0163	0.0163	0.0163	0.0163
HAE =	629	585	228	384

2. Meal Storage, Handling, and Loading Emissions (PM_{10})

The PM_{10} HAE for meal storage, handling, and loading is calculated as follows:

(quarterly average meal produced)(PM10 emission factor) = HAE

Permit Unit C-41-15-0, Meal Storage and Handling				
	1st Quarter	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
Average Quarterly Production	18,239	16,516	6,534	11,224
Receiving (tank distribution conveyers) PM-10 EF (lb/ton)	0.0025	0.0025	0.0025	0.0025
Receiving (storage tanks to hoppers) PM-10 EF (lb/ton)	0.0025	0.0025	0.0025	0.0025
HAE =	91	83	33	56

Permit Unit C-41-16-0, Meal Truck Loading				
	1st Quarter	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
Average Quarterly Production	18,239	16,516	6,534	11,224
PM-10 EF (lb/ton)	0.0008	0.0008	0.0008	0.0008
HAE =	14	13	5	9

3. Natural Gas-Fired Boiler Emissions

The HAE for SO_X, NO_X, VOC, and CO from the combustion of natural gas in the 32.0 MMBtu/hr boiler, permit C-41-12-1, is calculated as follows:

(quarterly average MMBtu of natural gas used)(emission factor) = HAE

The HAE from the natural gas-fired boiler C-41-12-1 is as follows:

Emissions Adjusted for Rule 4305:

Pursant to Rule 2201, Section 3.2.3.3, Actual Emission Reductions (AERs) are reductions beyond reductions proposed in the District's adopted air quality plan for attaining the reductions required by the California Clean Air Act. Therefore, emission factors used for calculating emission reductions may not exceed the emission limits for NOx and CO from this rule. For this permit unit, the permitted NOx emission factor is higher than the Rule 4305 NOx

limit of 0.036 lb/MMBtu, and therefore the rule limit will be used in quantifying the HAE. The Rule 4305 CO limit is higher than the currently permitted CO emission factor and will therefore not be used.

Permit Unit C-41-12-1, 32.0 MMBtu/hr Natural Gas-Fired Boiler					
		1st Quarter	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
Avg. Quarterly Gas Use (Therms @ 100,000 Btu)		298,801	250,399	104,484	287,054
Pollutant	**Emission Factor**	**Historical Actual Emissions - lbs (@ 1000 Btu/scf)**			
NOx	0.036 lb/MMBtu (Rule 4305 limit)	1,076	901	376	1,033
VOC	0.0022 lb/MMBtu (Current PTO)	66	55	23	63
PM10	0.0076 lb/MMBtu (AP-42, Table 1.4-2)	227	190	79	218
CO	0.033 lb/MMBtu (Current PTO)	986	826	345	947
SOx	0.0006 lb/MMBtu (AP-42, Table 1.4-2)	18	15	6	17

4. Hexane Recovery and Oil Extraction Unit Emissions

The HAE for VOC from the use of hexane by equipment serving permit unit C-41-9-1, is calculated as follows:

(quarterly average seed processed)(VOC emission Factor) = HAE

The HAE from permit unit C-41-9-1 is as follows:

Permit Unit C-41-9-1, Hexane Recovery and Oil Extraction				
	1st Quarter	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
Average Quarterly Seed Processed (tons)	34,172	31,767	12,387	20,882
VOC Emission Factor (lb/tons-seed)	3.67	3.67	3.67	3.67
HAE =	125,411	116,585	45,460	76,637

E. Actual Emissions Reductions

Pursuant to Section 3.2 of Rule 2201, AER shall be real, surplus, permanent, quantifiable & enforceable. AER is calculated per subsection 6.5, and is as follows:

AER = HAE (for shutdown of an emissions unit)

Therefore, the AER is equal to the HAE, and can be summarized for each pollutant as follows:

	VOC (pounds)	NOx (pounds)	CO (pounds)	PM10 (pounds)	SOx (pounds)
1st Quarter	125,477	1,076	986	30,247	18
2nd Quarter	116,640	901	826	28,095	15
3rd Quarter	45,483	376	345	10,960	6
4th Quarter	76,700	1,033	947	18,563	17

F. Air Quality Improvement Deduction

The Air Quality Improvement Deduction (AQID) is 10% of the AER per Rule 2201, subsection 6.5, and is summarized as follows:

	VOC (pounds)	NOx (pounds)	CO (pounds)	PM10 (pounds)	SOx (pounds)
1st Quarter	12,548	108	99	3,025	2
2nd Quarter	11,664	90	83	2,810	2
3rd Quarter	4,548	38	35	1,096	1
4th Quarter	7,670	103	95	1,856	2

G. Increase in Permitted Emissions

The ERC banking application has been submitted to bank emission reductions generated by the permanent shutdown of permitted equipment. Therefore, no increase in permitted emissions (IPE) is associated with this project.

H. Bankable Emissions Reductions Credits

The total bankable emissions reductions are summarized as follows:

	VOC (pounds)	NOx (pounds)	CO (pounds)	PM10 (pounds)	SOx (pounds)
1st Quarter	112,929	968	887	27,222	16
2nd Quarter	104,976	811	743	25,285	13
3rd Quarter	40,935	338	310	9,864	5
4th Quarter	69,030	930	852	16,707	15

VI. COMPLIANCE:

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

A. Real

The AERs quantified above were based on historical actual emissions and were calculated from actual production data from the stationary source. The affected processing equipment at the Chowchilla Oil Mill are now shutdown and the Permit Unit Requirements have been surrendered; therefore, the reductions are real.

B. Enforceable

The Permit Unit Requirements for the affected processing equipment have been surrendered; subsequently, any future seed processing and meal production cannot be performed unless an enforceable Authority to Construct is issued 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 and actual production data; therefore, the AERs are quantifiable.

D. Permanent

Anderson Clayton Corp. permanently shut-down the affected processing equipment at the Chowchilla Oil Mill, and surrendered the valid Permit Unit Requirements to the District, effective July 17, 2000; therefore, the AERs are permanent.

E. Surplus

The shutdown of the affected processing equipment at the stationary source 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.

As shown in Sections V.A and V.D of this report, the boiler (C-41-12-1) is subject to the requirements of District Rule 4305. In this case, emission factors used for calculating the emission reductions may not exceed the emission limits for NOx and CO for this rule. NOx emissions were calculated based on the Rule 4305 limit, and CO emissions were calculated based on the permitted emission factor as this is more stringent than the rule limit.

Permit Unit C-41-9-1 was in compliance with the requirements of District Rule 4691, Vegetable Oil Processing Operations, as seen in Project #940422 (included in Attachment D). The emission factor used for calculating the emissions from this shutdown operation was based on a control efficiency of at least 90%, meeting the control requirement under Section 5.1 of this rule.

Anderson Clayton cannot process cotton seed and produce meal at the Chowchilla Oil Mill without first obtaining Authorities to Construct and satisfying all applicable New Source Review requirements. Therefore, the AERs are surplus.

F. Timeliness

The application for ERC was submitted to the District on January 4, 2000. 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, in which the eligibility of the ERC application for the shutdown of processing equipment is dependent upon the definition of "shutdown" per Rule 2301. Section 3.11 of Rule 2301 defines "shutdown" as the following: the earlier of the permanent cessation of emissions from an emitting unit or the surrender of operating permits. If prior to the surrender of the operating permits, the APCO determines that the units have been removed or fallen into an inoperable or unmaintained condition such that startup would required an investment exceeding 50% of the current replacement, then the date of shutdown is the date of last emissions.

Anderson Clayton canceled the Permits to Operate (PTOs) equipment shutdown at the Chowchilla Oil Mill (facility ID# C-41) effective July 17, 2000. According to Anderson Clayton,

and based on inspections by the District's Compliance Division, the affected processing equipment was not removed and had not fallen into an inoperable condition at the time the PTO's were surrendered.

The date of shutdown is July 17, 2000 commensurate surrender of the Permit Unit Requirements for the affected processing equipment. The ERC application was submitted on January 4, 2001, which is less than 180 days after the date of shutdown. Therefore, the application is timely.

VII. RECOMMENDATION:

Issue the requested ERC Banking Certificates to Anderson Clayton Corp. after completion of the required 30-day public notification period, and review of comments received, for the following amounts:

	VOC (pounds)	NOx (pounds)	CO (pounds)	PM10 (pounds)	SOx (pounds)
ERC No.	**C-398-1**	**C-398-2**	**C-398-3**	**C-398-4**	**C-398-5**
1st Quarter	112,929	968	887	27,222	16
2nd Quarter	104,976	811	743	25,285	13
3rd Quarter	40,935	338	310	9,864	5
4th Quarter	69,030	930	852	16,707	15

Attachments:
Attachment A: Permit Unit Requirements for Shutdown Equipment
Attachment B: Historical Production Data
Attachment C: PM10/TSP Source Test Results for Cooler Dryer Fan Cyclone, Permit Unit C-41-19-2
Attachment D: Emissions from Hexane Recovery & Oil Extraction Unit
Attachment E: Summary of PM10 Emission Factors for Cottonseed Oil Mills Prepared by Fresno County APCD, 4/10/1991
Attachment F: Potential to Emit Calculations for the Chowchilla Oil Mill Facility (Project #930468)
Attachment G: AP-42 Emission Factors for Natural Gas Combustion
Attachment H: Facility and Process Flow Diagrams
Attachment I: Permit Unit Requirements for Equipment Remaining in Service at the Chowchilla Oil Mill
Attachment J: AP-42 Emission Factors for Grain Processing Facilities, Table 9.9.1-2
Attachment K: Seed/Meal Processing and Handling (Project #970202)

Attachment A

Permit Unit Requirements for Shutdown Equipment

INSPECTION

EXPIRATION DATE: 07/31/2003

WORKSHEET

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
300 HP FIRST CUT DELINTING OPERATION INCLUDING 14 LINTERS WITH ASSOCIATED CONVEYORS SERVED BY 4-42" 2D-2D CYCLONES, 1-30", 1 36", AND 1-18" 1D-3D CYCLONE. REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER

CONDITIONS

1. {12} Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
2. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. {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]
4. {271} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
5. {229} The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100]
6. {234} The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081]
7. Records of daily seed throughput shall be maintained, retained on the premises for at least two years and made available for District inspection upon request. [District Rule 1070]

(DELETED)

CONDITIONS FOR PERMIT C-41-6-1

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
183 HP SEED CLEANING OPERATION INCLUDING 6 SEED CLEANERS, WITH ASSOCIATED CONVEYORS, SERVED BY 12-28", 2-36", AND 1-32" 2D-2D CYCLONES; A LINT COLLECTION SYSTEM INCLUDING A 30 HP FAN, A FEEDER, AND A BALER SERVED BY ONE 46" 1D-3D CYCLONE. REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER

CONDITIONS

1. {12} Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
2. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. {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]
4. {271} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
5. {229} The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100]
6. {234} The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081]
7. Records of daily seed throughput shall be maintained, retained on the premises for at least two years and made available for inspection upon request. [District Rule 1070]
8. Emissions of PM10 from the facility shall not exceed 45 pounds per day. [District Rule 2201]

CONDITIONS FOR PERMIT C-41-7-0

INSPECTION

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

WORKSHEET

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
888.5 HP SECOND CUT DELINTING OPERATION INCLUDING 40 LINTERS WITH ASSOCIATED CONVEYORS SERVED BY A TOTAL OF 17 CYCLONES - 4-48", 4-54", 3-32", AND 1-34" 2D-2D CYCLONES; 3-28" AND 1-18" 1D-3D CYCLONES; AND 1 KICE CYCLONE *REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER*

CONDITIONS

1. {12} Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
2. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. {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]
4. {271} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
5. {229} The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100]
6. {234} The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081]
7. Records of daily seed throughput shall be maintained, retained on the premises for at least two years and made available for District inspection upon request. [District Rule 1070]

CONDITIONS FOR PERMIT C-41-8-1

INSPECTION WORKSHEET

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
216 HP DEHULLING OPERATION INCLUDING THREE DECORTICATORS, 3 HULL BEATERS, AND A TAILINGS BEATER SERVED BY THREE 44" AND THREE 34" 1D-3D CYCLONES *REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER*

CONDITIONS

1. {36} All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District NSR Rule]
2. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. {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]
4. {229} The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100]
5. Records of the facility operating schedule and daily cottonseed throughput shall be maintained, retained for at least two years, and made available to the District upon request. [District Rule 1070]

{233} The APCO or any authorized representative, upon request, shall have access to, and copies of, any records required to be kept under the terms and conditions of this permit. [CH&SC 42303]

7. Emission of PM10 shall not exceed 112.5 pounds per day. [District Rule 2201]

CONDITIONS FOR PERMIT C-41-9-1

INSPECTION WORKSHEET

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
400 HP HEXANE RECOVERY AND OIL EXTRACTION UNIT INCLUDING A MINERAL OIL PACKED TOWER SCRUBBER *REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER*

CONDITIONS

1. {227} All equipment or systems installed or used to achieve compliance with the terms and conditions of the Authority to Construct shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District NSR Rule]
2. The emissions of VOCs, calculated from hexane inventory losses, shall not exceed 2,200 lbs/day or 200,200 lbs/qtr. [District Rule 2201]
3. The quantity of seeds and nuts processed shall not exceed 500 tons in any one day. [District Rule 2201]
4. The mineral oil scrubber and vent condensers shall be in full operation whenever the extraction unit is operated. [District Rule 2201]
5. The extraction plant shall be inspected for fugitive VOC emissions monthly in accordance with EPA Method 21. [District Rule 4691]
6. Equipment found to be leaking, with emissions concentrations greater than 10,000 ppm as methane, shall be tagged immediately and repaired within ten days. [District Rule 4691]
7. An inspection log with records of the date and results of all inspections, repairs, and reinspections shall be maintained and made available to the District upon request. [District Rule 1070]
8. Daily records of the type and quantity of seeds and nuts processed and hexane inventory losses shall be maintained, retained on the premises for at least two years and made available for District inspection upon request. [District Rule 1070]
9. The facility shall comply with District Rule 4691 "Vegetable Oil Processing Operations". [District Rule 4691]

INSPECTION WORKSHEET

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
32.0 MMBTU/HR MURRAY NATURAL GAS-FIRED BOILER, WITH DIESEL OIL STANDBY CAPACITY *REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER*

CONDITIONS

1. {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]
2. {271} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
3. {234} The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081]
4. This unit shall be fired on PUC grade natural gas except during natural gas curtailment. This exception is limited to 336 cumulative hours per calendar year excluding equipment testing, which is not to exceed 48 hours per calendar year. [District Rule 4305]
5. Daily emissions shall not exceed 0.133 lb-NOx/MMBtu, 0.033 lb-CO/MMBtu, 0.013-lb PM10/MMBtu, nor 0.0022 lb-VOC/MMBtu when fired by natural gas. [District Rule 2201]
6. Daily emissions shall not exceed 0.152 lb-NOx/MMBtu, 0.038 lb-CO/MMBtu, 0.055 lb-SOx/MMBtu, 0.015 lb-PM10/MMBtu, nor 0.0003 lb-VOC/MMBtu when fired by distillate oil. [District Rule 2201]
7. Records of daily fuel (natural gas and oil) usage and operating hours shall be maintained and retained on the premises for at least two years and made available for District inspection upon request. [District Rule 1070]
8. Boiler shall comply with applicable requirements of District Rule 4305. [District Rule 4305]

CONDITIONS FOR PERMIT C-41-15-0

INSPECTION WORKSHEET

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
(4) 125 TON MEAL TANKS WITH HOPPERS SERVED BY ONE 20" 1D-3D CYCLONE, 1 SAUNCO PULSEJET MODEL SFSB6-16-159 BAGHOUSE WITH 14 BAGS, 2 ROTOLIFTS, 2 RECLAIM CONVEYORS, 1 BUCKET ELEVATOR, 1 TANK DISTRIBUTION CONVEYOR, AND 1 COLLECTION CONVEYOR. RATING:96HP *REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER*

CONDITIONS

1. {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]
2. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. {10} The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule]
4. {11} Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule]
5. Particulate matter emissions at the baghouse exhaust shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
6. Only one meal tank shall be loaded at any one time. [District Rule 2201]
7. All covers shall remain in place during operation of equipment. [District Rule 2201]
8. Daily emissions of PM10 shall not exceed 55 pounds per day. [District Rule 2201]
9. Pressure drop across filters shall be maintained between 2" and 6" W.C. [District Rule 2201]

CONDITIONS FOR PERMIT C-41-16-0

INSPECTION WORKSHEET

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
71 HP TRUCK LOADOUT OF MEAL INCLUDING (1) 20 HP INCLINE CONVEYOR, (1) 15 HP DISTRIBUTION CONVEYOR, AND (1) 3 HP BAGHOUSE CONVEYOR. THE EXHAUST SYSTEM CONSISTS OF FAN WITH 40 HP MOTOR AND (1) 3 HP MICRO PULSEAIR 1F1 BAGHOUSE WITH 80 BAGS.*REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER*

CONDITIONS

1. {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]
2. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. {10} The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule]
4. {11} Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule]
5. {265} All records shall be retained for a minimum of 2 years, and shall be made available for District inspection upon request. [District Rule 1070]
6. Particulate matter emissions at the baghouse exhaust shall not exceed 0.1 grains/dscf. [District Rule 4201]
7. All covers shall remain in place during operation. [District Rule 2201]
8. Exhaust fan and baghouse shall be operated at all times during loading of meal. [District Rule 2201]
9. The District may require the flowrate of air into the baghouse to be reduced if emissions at baghouse exhaust exceed the permitted conditions. [District Rule 2201]
10. No more than 500 tons of meal shall be loaded per day. [District Rule 2201]
11. Daily emissions of PM10 shall not exceed 12.5 pounds per day. [District Rule 2201]
12. Pressure drop across bags shall be maintained between 2" and 6" W.C. [District Rule 2201]
13. Records of daily meal loaded shall be maintained, retained on the premises for at least two years and made available for District inspection upon request. [District Rule 1070]

CONDITIONS FOR PERMIT C-41-19-2

INSPECTION WORKSHEET

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
903 HP COTTON SEED PREPARATION ROOM: CONSISTING OF A FLAKING MILL SERVED BY ONE 22" 1D-3D CYCLONE, A STEAM COOKER, TWO EXPANDERS, AND A COLLET COOLER/DRYER SERVED BY ONE 60" 1D-3D CYCLONE *REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER*

CONDITIONS

1. 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 dark or darker than Ringelmann 1 or equivalent to 20% opacity. [District Rule 4101]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
4. The seed meats processing rate shall not exceed 600 tons per day. [District Rule 2201]
5. Records of daily seed meats processed shall be maintained, retained on the premises for at least two years and made available for District inspection upon request. [District Rule 1070]
6. Particulate matter (PM) concentration in exhaust from the 1D-3D cyclone serving the meats flaking mill shall not exceed 0.02 grains/dscf. [District Rule 2201]
7. Particulate matter (PM) concentration in exhaust from the 1D-3D cyclone serving the collet cooler/dryer shall not exceed 0.0095 grains/dscf. [District Rule 2201]
8. Emissions of PM10 from the seed meats preparation facility shall not exceed 11.0 lb/day. [District Rule 2201]

Attachment B

Historical Production Data

- Summary of Annual Throughputs and Production Rates
- Cotton Seed Crushed and Meal Produced
- Hexane Usage
- Natural Gas Usage

Summary of Annual Throughputs and Production Rates

HISTORICAL PRODUCTION DATA

Year	Seed Processed (tons/year)	Meal Produced (tons/year)	Hexane Usage (gallons/yr)	Natural Gas Use (Therms)	Natural Gas Use (MMSCF)
1979	126,700	69,685	126,350	no data	no data
1980	115,650	63,608	120,420	no data	no data
1981	132,500	72,875	144,630	no data	no data
1982	114,800	63,140	76,460	no data	no data
1983	46,500	25,575	36,225	no data	no data
1984	88,500	48,675	54,110	no data	no data
1985	113,500	62,425	75,290	no data	no data
1986	115,700	63,635	68,000	no data	no data
1987	105,500	58,025	78,160	no data	no data
1988	114,700	63,085	84,510	no data	no data
1989	114,000	62,700	103,090	no data	no data
1990	102,965	56,631	102,129	no data	no data
1991	118,446	65,145	84,273	no data	no data
1992	119,784	61,796	62,002	1,022,070	97.34
1993	130,779	69,761	84,875	1,026,900	97.8
1994	130,413	67,363	0	1,201,200	114.4
1995	100,363	50,468	105,496	938,173	
1996	123,888	65,885	111,992	1,114,967	
1997	74,527	39,140	154,594	766,508	
1998	57,137	29,948	102,007	407,158	
1999	0	0	0	0	
2000	0	0	0	0	
3 Year Avg (1996-1998)	***85,184.00***	***44,991.00***	***122,864.33***	***762,877.67***	
7 Year Avg (1992-1998)	***105,270.14***	***54,908.71***	***103,494.33***	***925,282.29***	
20 Year Avg (1979-1998)	***107,317.60***	***57,978.23***	***93,400.68***	***N/A***	

Two Year Averages						HISTORICAL PRODUCTION DATA				
Natural Gas Use (Therms)	*Hexane Usage (gallons/yr)*	*Meal Produced (tons/year)*	*Seed Processed (tons/year)*	*Two Year Periods*	Year	Seed Processed (tons/year)	Meal Produced (tons/year)	Hexane Usage (gallons/yr)	Natural Gas Use (Therms)	Natural Gas Use (MMSCF)
					1979	126,700	69,685	126,350	no data	no data
					1980	115,650	63,608	120,420	no data	no data
					1981	132,500	72,875	144,630	no data	no data
					1982	114,800	63,140	76,460	no data	no data
					1983	46,500	25,575	36,225	no data	no data
					1984	88,500	48,675	54,110	no data	no data
					1985	113,500	62,425	75,290	no data	no data
					1986	115,700	63,635	68,000	no data	no data
					1987	105,500	58,025	78,160	no data	no data
					1988	114,700	63,085	84,510	no data	no data
					1989	114,000	62,700	103,090	no data	no data
					1990	102,965	56,631	102,129	no data	no data
					1991	118,446	65,145	84,273	no data	no data
					1992	119,784	61,796	62,002	1,022,070	97.34
					1993	130,779	69,761	84,875	1,026,900	97.8
					1994	130,413	67,363	0	1,201,200	114.4
					1995	100,363	50,468	105,496	938,173	
1,026,570	*108,744*	*58,177*	*112,126*	*1995-1996*	1996	123,888	65,885	111,992	1,114,967	
940,738	*133,293*	*52,513*	*99,208*	*1996-1997*	1997	74,527	39,140	154,594	766,508	
586,833	*128,301*	*34,544*	*65,832*	*1997-1998*	1998	57,137	29,948	102,007	407,158	
					1999	0	0	0	0	
					2000	0	0	0	0	
					3 Year Avg (1996-1998)	*85,184.00*	*44,991.00*	*122,864.33*	*762,877.67*	
					7 Year Avg (1992-1998)	*105,270.14*	*54,908.71*	*103,494.33*	*925,282.29*	
					20 Year Avg (1979-1998)	*107,317.60*	*57,978.23*	*93,400.68*	*N/A*	

Cotton Seed Crushed and Meal Produced

(Tons/Quarter and Tons/Year)

YEAR 1990

Seed Crushed

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1990	?		1st Qtr	?
1-Apr	1990	?		2nd Qtr	?
1-Jul	1990	?		3rd Qtr	?
1-Oct	1990	?		4th Qtr	?
1-Jan	1991	?		**Total**	?
				reported	102,965
				difference	?

Meal Produced

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1990	?		1st Qtr	?
1-Apr	1990	?		2nd Qtr	?
1-Jul	1990	?		3rd Qtr	?
1-Oct	1990	?		4th Qtr	?
1-Jan	1991	?		**Total**	?

YEAR 1991

Seed Crushed

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1991	?		1st Qtr	?
1-Apr	1991	?		2nd Qtr	?
1-Jul	1991	?		3rd Qtr	?
1-Oct	1991	?		4th Qtr	?
1-Jan	1992	44,059		**Total**	?
				reported	188,446
				difference	?

Meal Produced

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1991	?		1st Qtr	?
1-Apr	1991	?		2nd Qtr	?
1-Jul	1991	?		3rd Qtr	?
1-Oct	1991	?		4th Qtr	?
1-Jan	1992	21,601		**Total**	?

YEAR 1992

Seed Crushed

Data From Reports		Tons	Quarterly Calculation	Tons
1-Jan	1992	44,059	1st Qtr	39,336
1-Apr	1992	83,395	2nd Qtr	35,881
1-Jul	1992	119,276	3rd Qtr	8,942
1-Oct	1992	8,942	4th Qtr	30,574
1-Jan	1993	39,516	**Total**	119,784
			reported	119,784
			difference	0

Meal Produced

Data From Reports		Tons	Quarterly Calculation	Tons
1-Jan	1992	21,601	1st Qtr	21,232
1-Apr	1992	42,833	2nd Qtr	19,251
1-Jul	1992	62,084	3rd Qtr	4,684
1-Oct	1992	4,684	4th Qtr	16,629
1-Jan	1993	21,313	**Total**	61,796

YEAR 1993

Seed Crushed

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1993	39,516		1st Qtr	33,364
1-Apr	1993	72,880		2nd Qtr	39,174
1-Jul	1993	112,054		3rd Qtr	28,507
1-Oct	1993	28,507		4th Qtr	29,734
1-Jan	1994	58,241		**Total**	130,779
				reported	130,779
				difference	0

Meal Produced

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1993	21,313		1st Qtr	17,916
1-Apr	1993	39,229		2nd Qtr	21,117
1-Jul	1993	60,346		3rd Qtr	15,125
1-Oct	1993	15,125		4th Qtr	15,603
1-Jan	1994	30,728		**Total**	69,761

YEAR 1994

Seed Crushed

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1994	58,241		1st Qtr	39,217
1-Apr	1994	97,458		2nd Qtr	33,369
1-Jul	1994	130,827		3rd Qtr	28,711
1-Oct	1994	28,711		4th Qtr	29,116
1-Jan	1995	57,827		**Total**	130,413
				reported	130,413
				difference	0

Meal Produced

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1994	30,728		1st Qtr	20,165
1-Apr	1994	50,893		2nd Qtr	16,771
1-Jul	1994	67,664		3rd Qtr	14,355
1-Oct	1994	14,355		4th Qtr	16,072
1-Jan	1995	30,427		**Total**	67,363

YEAR 1995

Seed Crushed

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1995	57,827		1st Qtr	31,728
1-Apr	1995	89,555		2nd Qtr	31,641
1-Jul	1995	121,196		3rd Qtr	10,936
1-Oct	1995	10,936		4th Qtr	26,058
1-Jan	1996	36,994		**Total**	100,363
				reported	96,984
				difference	-3,379

Meal Produced

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1995	30,427		1st Qtr	14,978
1-Apr	1995	45,405		2nd Qtr	14,954
1-Jul	1995	60,359		3rd Qtr	6,661
1-Oct	1995	6,661		4th Qtr	13,875
1-Jan	1996	20,536		**Total**	50,468

YEAR 1996

Seed Crushed

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1996	36,994		1st Qtr	32,500
1-Apr	1996	69,494		2nd Qtr	34,547
1-Jul	1996	104,041		3rd Qtr	24,773
1-Oct	1996	24,773		4th Qtr	32,068
1-Jan	1997	56,841		**Total**	123,888
				reported	?
				difference	?

Meal Produced

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1996	20,536		1st Qtr	17,212
1-Apr	1996	37,748		2nd Qtr	18,223
1-Jul	1996	55,971		3rd Qtr	13,068
1-Oct	1996	13,068		4th Qtr	17,382
1-Jan	1997	30,450		**Total**	65,885

YEAR 1997

Seed Crushed

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1997	56,841		1st Qtr	35,844
1-Apr	1997	92,685		2nd Qtr	28,987
1-Jul	1997	121,672		3rd Qtr	0
1-Oct	1997	0		4th Qtr	9,696
1-Jan	1998	9,696		**Total**	74,527
				reported	73,465
				difference	-1,062

Meal Produced

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1997	30,450		1st Qtr	19,266
1-Apr	1997	49,716		2nd Qtr	14,808
1-Jul	1997	64,524		3rd Qtr	0
1-Oct	1997	0		4th Qtr	5,066
1-Jan	1998	5,066		**Total**	39,140

YEAR 1998

Seed Crushed

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1998	9,696			
1-Mar	1998	29,025		1st Qtr	27,486
1-Apr	1998	8,157		2nd Qtr	29,651
1-Jul	1998	37,808		3rd Qtr	0
1-Oct	1998	0		4th Qtr	0
1-Jan	1999	0		**Total**	57,137
				reported	57,137
				difference	0

Meal Produced

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1998	5,066			
1-Mar	1998	15,226		1st Qtr	14,451
1-Apr	1998	4,291		2nd Qtr	15,497
1-Jul	1998	19,788		3rd Qtr	0
1-Oct	*1998*	*0*		*4th Qtr*	0
1-Jan	1999	0		**Total**	29,948

Hexane Usage

(Gallons/Month and Gallons/Year)

ANDERSON CLAYTON CORP.
CHOWCHILLA MILL HEXANE USAGE - GALLONS

	YEAR			
	1995	1996	1997	1998
JAN		9,767	8,489	22,562
FEB		6,171	8,741	20,683
MAR		5,223	-	16,695
APR		12,304	20,488	13,098
MAY		8,254	32,123	19,357
JUN		9,967	21,284	9,612
JUL	10,653	6,680	-	-
AUG	-	13,150	-	-
SEP	-	9,681	-	-
OCT	11,767	17,862	-	-
NOV	11,430	3,661	8,193	-
DEC	6,075	9,272	55,276	-
TOTAL	39,925	111,992	154,594	102,007

SOURCE: ACCOUNTING GENERAL LEDGER

HEXANE - CHOWCHILLA MILL

CALENDAR YEAR	TONS CRUSH	GALLONS ~~USED~~ PURCHASED. LOST	TONS USED	#/gal	GALLONS/ TON	
1979	126,700	126,350	392		1.00	
1980	115,650	120,420	373		1.04	
1981	132,500	144,630	448		1.09	
1982	114,800	76,460	237		.67	
1983	46,500	36,225	112		.78	
1984	88,500	54,110	168		.61	
1985	113,500	75,290	233		.66	
1986	115,700	68,000	211		.59	
1987	105,500	78,160	242		.74	4.6
1988	114,700	84,510	262		.74	4.6
1989	114,000	103,090	320	6.2	.90	5.6 lb VCC [illegible]
1990	102,965	102,129	317	6.2	.99	6.1
1991	118,446	84,273	261	6.2	.71	4.4
1992	119,784	62,350	178	5.7	.55	3.2
1993	130,779	84,875	242	5.7	.65	4.0
	1630,024	1300,872	3996			
	ave = 108,668	86,725	266.4			

6.2 #/gal.

.90 gal/ton × 114,000 tons × 6.2 #/gal — 5 yr aver 4.6

3818 +

89-93 (5 yr) ⇒ 585974
436717 → 4.248
(4.25 lb/ton)

4.5 lbs VOC/ton seed (hexane) [illegible]

4/16/90

$.90 \frac{gal}{ton} \times 6.2 \frac{\#}{gal} \times \frac{1\ ton}{2000\ \#} =$

90-93 3 yr
369009/231498 ⇒ 3.576

318.1 tons

De Frank says use these 1989 figures & he'll supply the N.G. usage. at 6 terms per ton should get 684,000 therms

Natural Gas Usage

(Therms/Month)

Location: Chowchilla Mill - Gas
Account: FTN AD 02741-1
Meter: 00000
Utility Company: Pacific Gas & Electric

Year: 1995
Rate: GIPBS

Read Dates		Billing	Gas		Unit Cost	Tx Ohio	Diff	Adjust
From	To	Days	Therm	Total	Per Therm	dth	+-/	+/-
12/31	1/31	31	111555	$11,276.41	0.101	11250	262.5	$414.71
1/31	2/28	31	90270	$9,548.35	0.106	11500	-2184.1	($2,904.90)
2/28	3/31	31	102654	$10,637.80	0.104	9800	793.9	$905.04
3/31	4/30	30	98365	$10,007.62	0.102	11490	-1338.7	($1,419.06)
4/30	5/31	31	101835	$10,310.78	0.101	10245	264.4	$296.10
5/31	6/30	30	85335	$8,587.83	0.101	9000	-193.4	($243.72)
6/30	7/31	31	92665	$9,297.48	0.100	9544	19.0	$32.54
7/31	8/31	31	16417	$2,330.00	0.142	1671	23.2	$40.89
8/31	9/30	30	0	$839.33		23	23.0	$43.24
9/30	10/31	31	37222	$4,219.13	0.113	3777	64.3	$120.90
10/30	11/30	30	100018	$11,620.15	0.116	10434	-112.1	($197.37)
11/30	12/31	31	101837	$12,143.24	0.119	10687	-177.4	($312.26)

Total 938173 $100,818.12

Remarks:

C1 - Mill

From: "Carlson, Robert" <RCC7@pge.com>
To: "Norm Hansen (E-mail)" <NormH@andersonclayton.com>
Date: 12/28/00 11:50AM
Subject: FTN AD 02741

YEAR	YYYYMM	CONTROL_NUM	ACCT_NUM	SERVICE STREET	SERVICE CITY	PRIOR_READ_DATE	CURRENT_READ_DATE	BILLING_PERIOD	GAS_RATE	THERMS	GAS_CHARGES
1996	199601	5849404	FTNAD02741	25184 RD 16	MADERA	12/31/1995	1/31/1996	31	GIPBS	102,885	$13,710.90
1996	199602	5849404	FTNAD02741	25184 RD 16	MADERA	1/31/1996	2/29/1996	29	GIPBS	96,812	$12,950.38
1996	199603	5849404	FTNAD02741	25184 RD 16	MADERA	2/29/1996	3/31/1996	31	GIPBS	70,248	$9,623.77
1996	199604	5849404	FTNAD02741	25184 RD 16	MADERA	3/31/1996	4/30/1996	30	GIPBS	99,436	$11,655.19
1996	199605	5849404	FTNAD02741	25184 RD 16	MADERA	4/30/1996	5/31/1996	31	GIPBS	104,620	$12,219.73
1996	199606	5849404	FTNAD02741	25184 RD 16	MADERA	5/31/1996	6/30/1996	30	GIPBS	95,980	$11,278.83
1996	199607	5849404	FTNAD02741	25184 RD 16	MADERA	6/30/1996	7/31/1996	31	GIPBS	97,189	$11,410.49
1996	199608	5849404	FTNAD02741	25184 RD 16	MADERA	7/31/1996	8/31/1996	31	GIPBS	100,755	$11,306.96
1996	199609	5849404	FTNAD02741	25184 RD 16	MADERA	8/31/1996	9/30/1996	30	GIPBS	29,069	$3,817.81
1996	199610	5849404	FTNAD02741	25184 RD 16	MADERA	9/30/1996	10/31/1996	31	GIPBS	79,144	$8,918.08
1996	199611	5849404	FTNAD02741	25184 RD 16	MADERA	10/31/1996	11/30/1996	30	GIPBS	113,924	$14,343.76
1996	199612	5849404	FTNAD02741	25184 RD 16	MADERA	11/30/1996	12/31/1996	31	GIPBS	111,494	$14,054.98
1997	199701	5849404	FTNAD02741	25184 RD 16	MADERA	12/31/1996	1/31/1997	31	GIPBS	116,296	$14,625.65
1997	199702	5849404	FTNAD02741	25184 RD 16	MADERA	1/31/1997	2/28/1997	28	GIPBS	108,212	$13,664.94
1997	199703	5849404	FTNAD02741	25184 RD 16	MADERA	2/28/1997	3/31/1997	31	GIPBS	111,045	$14,001.62
1997	199704	5849404	FTNAD02741	25184 RD 16	MADERA	3/31/1997	4/30/1997	30	GIPBS	111,848	$12,270.57

1997	199705	5849404	FTNAD02741	25184 RD 16	MADERA		
4/30/1997	5/31/1997	31	GIPBS	118,092	$13,247.93		
1997	199706	5849404	FTNAD02741	25184 RD 16	MADERA		
5/31/1997	6/30/1997	30	GIPBS	83,385	$9,818.84		
1997	199707	5849404	FTNAD02741	25184 RD 16	MADERA		
6/30/1997	7/31/1997	31	GIPBS	1,532			
$970.53							
1997	199708	5849404	FTNAD02741	25184 RD 16	MADERA		
7/31/1997	8/31/1997	31	GIPBS	-			
$804.92							
1997	199709	5849404	FTNAD02741	25184 RD 16	MADERA		
8/31/1997	9/30/1997	30	GIPBS	-			
$804.92							
1997	199710	5849404	FTNAD02741	25184 RD 16	MADERA		
9/30/1997	10/31/1997	31	GIPBS	-			
$804.92							
1997	199711	5849404	FTNAD02741	25184 RD 16	MADERA		
10/31/1997	11/30/1997	30	GIPBS	25,047	$3,921.52		
1997	199712	5849404	FTNAD02741	25184 RD 16	MADERA		
11/30/1997	12/31/1997	31	GIPBS	103,256	$13,653.06		
1998	199801	5849404	FTNAD02741	25184 RD 16	MADERA		
12/31/1997	1/31/1998	31	GIPBS	104,091	$12,297.22		
1998	199802	5849404	FTNAD02741	25184 RD 16	MADERA		
1/31/1998	2/28/1998	28	GIPBS	104,519	$12,344.51		
1998	199804	5849404	FTNAD02741	25184 RD 16	MADERA		
3/31/1998	4/30/1998	30	GIPBS	102,820	$12,297.44		
1998	199805	5849404	FTNAD02741	25184 RD 16	MADERA		
4/30/1998	5/31/1998	31	GIPBS	106,950	$5,238.46		
1998	199806	5849404	FTNAD02741	25184 RD 16	MADERA		
5/31/1998	6/30/1998	30	GIPBS	84,196	$7,215.03		
1998	199807	5849404	FTNAD02741	25184 RD 16	MADERA		
6/30/1998	7/31/1998	31	GIPBS	6,581			
$1,389.25							
1998	199808	5849404	FTNAD02741	25184 RD 16	MADERA		
7/31/1998	8/31/1998	31	GIPBS	1,247			
$988.88							
1998	199809	5849404	FTNAD02741	25184 RD 16	MADERA		
8/31/1998	9/30/1998	30	GIPBS	641			
$896.15							
1998	199810	5849404	FTNAD02741	25184 RD 16	MADERA		
9/30/1998	10/31/1998	31	GIPBS	204			
$862.83							
1998	199811	5849404	FTNAD02741	25184 RD 16	MADERA		
10/31/1998	11/30/1998	30	GIPBS	-			
$847.28							
1998	199812	5849404	FTNAD02741	25184 RD 16	MADERA		
11/30/1998	12/31/1998	31	GIPBS	-			

$321.42
1999 199901 5849404 FTNAD02741 25184 RD 16 MADERA
12/31/1998 1/31/1999 31 GIPBS -
$329.45
1999 199902 5849404 FTNAD02741 25184 RD 16 MADERA
1/31/1999 2/28/1999 28 GIPBS 307
$358.38
1999 199903 5849404 FTNAD02741 25184 RD 16 MADERA
2/28/1999 3/31/1999 31 GIPBS -
$329.45
1999 199904 5849404 FTNAD02741 25184 RD 16 MADERA
3/31/1999 4/30/1999 30 GIPBS -
$329.45
1999 199905 5849404 FTNAD02741 25184 RD 16 MADERA
4/30/1999 5/31/1999 31 GIPBS -
$86.84
1999 199906 5849404 FTNAD02741 25184 RD 16 MADERA
5/31/1999 6/30/1999 30 GIPBS -
$11.02
1999 199907 5849404 FTNAD02741 25184 RD 16 MADERA
6/30/1999 7/31/1999 31 GIPBS -
$11.02

Attachment C

PM10/TSP Source Test Results for Cooler Dryer
Fan Cyclone, Permit Unit C-41-19-2

ANDERSON CLAYTON
3325 Figarden Drive
Fresno, CA 93711

Attn: Steve White

PM10 & TOTAL PARTICULATE TESTING
COOLER DRYER FAN CYCLONE
ATC #C-41-9-2
April 29, 1998

Submitted to
San Joaquin Valley Unified APCD
1999 Tuolumne Suite 200
Fresno, CA 93721

Attn: Gabe Lazar

Prepared by
AIRx TESTING
2175 Goodyear Avenue Unit #105
Ventura, CA 93003

Job Number
16031

Laboratory Report Number
397-010

Test Team Leader
Cam Donnahoo

Results Verified By:
Tom Porter
Partner

Submitted
July 15 , 1998

AIRx TESTING

PARTICULATE EMISSION SUMMARY
4/29/98

	Run #1	Run #2	Run #3	Average
Total Particulate				
gr/DSCF	0.0132	0.0119	0.0035	***0.0095***
lb/hr	0.76	0.71	0.21	***0.56***
Particule Size Distribution				
+10μ (%)	20.5	18.1	50.1	***29.6***
-10μ (%)	79.5	81.9	49.9	***70.4***
<10μ Results				
gr/DSCF	0.0105	0.0098	0.0018	***0.0074***
lb/hr	0.60	0.58	0.10	***0.43***
Exhaust Flowrate, DSCFM	6737	6903	6794	***6811***

Attachment D

Emissions from Hexane Recovery & Oil Extraction Unit

- VOC Calculations for Hexane Recovery and Oil Extraction Unit, Permit Unit C-41-9-1 (Project 940442)

- VOC Source Test Results for Hexane Recovery and Oil Extraction Unit, Permit Unit C-41-9-1

VOC Calculations for Hexane Recovery and Oil Extraction Unit, Permit Unit C-41-9-1 (Project 940442)

San Joaquin Valley
Unified Air Pollution Control District
Engineering Evaluation

ANDERSON CLAYTON CORP. - OIL EXTRACTION UNIT, CHOWCHILLA
 # 940442

Engineer: Tope Adewusi
Date: December 13, 1994

Facility: Anderson Clayton Corporation
Mailing Address: P.O. Box 847
Chowchilla, CA 93610

Contact Name: Steve White
Phone: (209) 487-7932

I. PROPOSAL:

The primary business of this facility is cotton seed oil and nut oil extraction. The applicant proposes to modify the existing Authority to Construct, ATC #C-41-9-1 (copy attached) by implementing the following:

(1) Removing the mechanical oil extractor which removes about 67% of the seed or nut oil, and replacing it with a system that uses 100% extraction by hexane;

(2) Increasing seed throughput from 500 tons/day to 600 tons/day;

(3) Replacing the existing mineral oil scrubber which controls hexane emissions with a larger unit expected to have a higher control efficiency.

The applicant does not expect to have an increase in hexane emission. In fact he is willing to accept hexane emission limitation kept to the current level. The District will require source tests to ensure that hexane emissions do not exceed current permit limitations.

The oil mill will continue to operate 24 hours per day, 7 days per week and 52 weeks per year.

II. APPLICABLE RULES:

Rule 2201 New and Modified Stationary Source Review Rule (Adopted September 19, 1991; Amended October

21, 1993)

Rule 3010	Permit Fees (Adopted May 21, 1992; Amended December 17, 1992)
Rule 4101	Visible Emissions (Adopted May 21, 1992; Amended December 17, 1992)
Rule 4102	Nuisance (Adopted May 21, 1992; Amended December 17, 1992)
Rule 4691	Vegetable Oil Processing Operations (Adopted April 11, 1991; Amended December 17, 1992)
CHSC 42301.6	Source location within 1,000 feet from a school site.

III. PROJECT LOCATION:

25184 Road 16, Chowchilla, CA

Applicant states that there is a school (Chowchilla High School) within 1,000 feet of the project site.

IV. PROCESS DESCRIPTION:

Cotton seeds from local cotton gins are trucked to the facility and unloaded by conveyor belts onto open stockpiles, which are covered by tarps when fully loaded. The applicant is proposing to increase his seed throughput from 500 to 600 tons per day.

Cottonseed meats are mixed with water. Moisturized meats are run through three crushing rolls. Crushed meats are run through one horizontal opposed flaking roll. Flaked meats are cooked in six precookers and cooked meats are formed into collets by two expanders. The collets enter solvent (hexane) plant where all the oil is extracted and refined.

The hexane solvent plant will operate in the same way as the existing system. Some of the equipment will be changed to accommodate the increase in oil. The mixture of oil and solvent is called miscella. Miscella from the evaporator will be pumped to the refinery batch/surge tanks. Miscella will discharge from the tanks and be mixed with caustic soda prior to the sonulator mixer. The miscella and caustic soda mixture will go through the reactor tubes before entering the

centrifuge. The primary centrifuge will discharge soapstock and refined miscella. Soapstock will be pumped to the disolventizer. Refined miscella will be mixed with water before entering the water wash centrifuge. Refined dry miscella will be discharged from the centrifuge and go to the second effect evaporator to continue hexane recovery. Water will discharge to the sump and be reused in the mill processes.

V. REVIEW OF PROPOSED CONTROL EQUIPMENT

Hexane emissions are controlled by a modified and bigger mineral oil, countercurrent, packed tower scrubber.

Air saturated with hexane and water vapor enters the bottom of the column from the vent condenser and passes upward through a wetted packed bed. Mineral oil will absorb more than 90% of hexane from the air. The vent fan discharges the air, water vapor, and unabsorbed hexane vapor to the atmosphere. The volume of hexane vapor discharged to the atmosphere is a function of air flow and mineral oil column capacity.

Air enters the plant with the prepared meats. The quantity of prepared meats will increase but the volume of air will not change.

With the addition of larger mineral oil column (larger contact area) and unchanged air flow, the removal efficiency is expected to increase. The proposed tower will utilize more ceramic saddles for packing. The packing increases hexane absorption efficiency by increasing the surface area over which the scrubber mineral oil flows, presenting a large area for mass transfer to occur. Hexane purchases over a ten year period averaged 0.8 gallons per ton of seed crushed. Average purchases are expected to be equal or less with the proposed plant.

The scrubber design bases are:

Inlet gas to absorber	=	75 cfm dry air saturated with hexane and water at 100^0F maximum
Exhaust gas	=	75 cfm dry air saturated with water and at 90% LEL of hexane
Scrubber efficiency	=	95% minimum. However, actual efficiency, which will be demonstrated by source testing is expected to go up higher.

Vol. of proposed column	=	Proposed column is 16" diameter and 25' long implying that the volume = π x $(16'/12)^2$ x 1/4 x 25' = 34.9 cf.
Volume of existing col.	=	Existing column is 12" diameter and 20' long implying that the volume = π x $(12'/12)^2$ x 1/4 x 20' = 15.7 cf. The increase by (34.9/15.7 x 100%) 222% is expected to translate into improved control efficiency. While actual dimensions do not accurately reflect the capacity, the relative sizes do approximate a larger contact area.

Design check on hexane velocity:

The flow rate = 75 cfm = 75/60 cfs = 1.25 cubic feet per second.
Hexane duct inlet diameter = 18" = 1.5' (per applicant)

Therefore, hexane velocity = flow rate/duct cross-sectional area

= $(1.25 \times 4)/\pi \times 1.5^2$ ft/sec = 0.9 ft/sec

According to Section 4-40 of EPA Course 415 (Control of Gaseous Emissions) the ideal velocity in the packed bed scrubbers is approximately 1 to 3 ft/sec. Since the calculated emission is close to that range, the tower column design is acceptable.

VI. EMISSIONS ESTIMATE:

A. Best Available Control Technology (BACT) calculation:

Assumptions:

- Hexane recovery operation is 24 hours per day, 365 days/year.
- All hexane losses from the solvent extraction unit are volatile organic compounds (VOC) emitted to the atmosphere. It is also assumed that the VOC retained in the meal are eventually emitted to the atmosphere.
- The VOC emitted per ton of seed crushed, shall be assumed to be equivalent to the average quantity of hexane lost

per ton of cottonseed crushed in 1991. Since we had 2200 lbs VOC/500 tons of seed per day, an emission factor (EF) of (2200/500) 4.4 lb VOC per ton of seed crushed was established and used on the existing Permit #C-41-9-1. Emission factor prior to this proposal, EF_{before} = 4.4 #/t

- The VOC emissions from the seeds and nuts in this process shall be assumed to depend on the quantity of seed processed and not on the quantity of oil produced. Since VOC emissions is expected to remain at 2200 lbs/day for 600 tons of seeds, then an emission factor of (2200/600) 3.7 lb VOC per ton of seed crushed will be established for the proposed modified Permit #C-41-9-2. Emission factor based on this proposal, EF_{after} = 3.7 lbs/ton.

- The emissions from the extraction of seed oils and nuts shall be assumed to be equivalent to the emissions from the extraction of cottonseed oil.

The following acronyms which are fully defined in Section 6.2 of Rule 2201, stand for:

HAPE = Historical Adjusted Potential Emissions
IPE = Increase in Permitted Emissions
PE = Potential to Emit
PEPM = Potential to Emit Prior to Modification
SSPE = Stationary Source Potential to Emit
ΔCE = Change in Control Efficiency

Hexane emissions will be limited to the previously established limit of 2200 lb VOC/day based on processing 500 tons of seed per day.

From Section 6.2.7 of Rule 2201,

HAPE = PEPM(1 - ΔCE) = 2200 lbs/day x (1 - ΔCE)

From Policy # NSR/ERC 5-1 dated 3/25/92,

$\Delta CE = 1 - EF_{after}/EF_{before} = 1 - 3.67/4.4 = 0.17$

Therefore,
HAPE = 2200(1 - 0.17) = 1835

IPE = PE - HAPE = 2200 - 1835 = 365 lbs/day
Since IPE is greater than 2 lbs/day, BACT is required.

IPE for BACT calculation exceeds 100 lbs/day, but we use true permitted emissions changes to determine offsets, SSPE, NSR balance and public noticing. So public noticing is not required since $PE_{before} = PE_{after}$ = 2200 lbs/day.

No other permit unit is being modified as a result of this project.

B. Determination of SSPE

1) Permit No. C-41-12-0 is for a 13.5 MMBTU/HR natural gas fired boiler. The permit condition does not include a daily emission limit (DEL), nonetheless, it contributes to SSPE.

Per AP-42, the emission factor for NOx is 140 lb/10^6 cf (Table 1.4-2) and for VOC, it is 5.8 lb/10^6 cf (Table 1.4-3).

The heating value of natural gas is 1050 BTU/CF per District practice.

PE (NOx) = 140 lb/10^6 cf x 13,500,000 BTU/HR x 1/1050 BTU/cf x 24 hrs/day x 365 days/year x 1/2000 lbs/ton = 7.884 ton/year

PE (VOC) = 5.8 x 13.5/1050 x 24 x 365/2000 = 0.33 tons/year

Table 1

PERMIT NO.	PE (pounds per day)				
	PM_{10}	SOx	NOx	VOC	CO
C-41-6-1 *	45	-	-	-	-
C-41-8-1 *	112.5	-	-	-	-
C-41-9-2	-	-	-	2200	-
C-41-12-0	-	-	43.2	1.8	-
C-41-15-0 *	55	-	-	-	-
C-41-16-0	12.5	-	-	-	-
C-41-4, 5, 7, 10, 11, 13, 14, 17 * (have no DELs)	-	-	-	-	-
Total (lbs/day)	225	-	43.2	2201.8	-
Partial SSPE (tons/year)	-	-	7.9	401.8	-

The figures in the above Table 1 are taken from existing permits.

* There are no combustion emissions with these emission units, and therefore no contribution to VOC & NOx SSPE's.

C. NSR Balance Calculations:

The New Source Review (NSR) balance is equal to the sum of the PE's for all emission units after the baseline date. The baseline date for Madera County is May 21, 1979. The facility was in operation prior to that date. There have been no increases in permitted emissions since the baseline.

Therefore, NSR Balance equals zero for the pollutants.

D. Offset Determination:

The SSPE for VOC as shown in Table 1 is 401.8 tons which exceeds the offset trigger level of 10 tons/year indicated in Section 4.2.3 of Rule 2201, therefore, offset is required. The quantity of offset required is to be evaluated per Section 6.8.2.1 of Rule 2201 as follows:

Offset = $[SSPE_{after} - SSPE_{before}]$ x Offset ratio

Since there are no changes in PE's shown in Table 1,

$\Delta SSPE = 0$, and offsets are not required.

VII. COMPLIANCE:

Rule 2201 New and Modified Stationary Source Review Rule

The mineral oil scrubber and condenser with a 95% capture and control efficiency will be accepted as BACT. The scrubber with condenser is BACT per South Coast Air Quality Management District BACT Guideline (copy of Sec. 175 is attached). SJVUAPCD Clearinghouse and CAPCOA Clearinghouse do not have BACT determinations for vegetable oil purification process. In addition, the District is not aware of any other technologically feasible technology for controlling these emissions. Therefore BACT is being proposed.

NSR balance for affected pollutants is zero. There is no increase in SSPE for VOC or NOx. Therefore, no offsets are required.

Rule 3010 Permit Fees

Applicant has paid $60.00 application fee.

Rule 4101 Visible Emissions

Emissions are not expected to exceed 20% opacity based on inspections of past operations.

Rule 4102 Nuisance

The current operation has not created a public nuisance in the past, there has been no known odor complaints. Continued compliance is expected. In addition, since no increase in emissions of hexane are proposed, no increased health risk is expected from this project.

Rule 4691 Vegetable Oil Processing Operations

Applicant has so far been complying with this rule by utilizing a mineral oil scrubber with at least 95% removal efficiency, keeping records of hexane usage, and checking for leaks. Further compliance is expected, and the 90% capture and control efficiency requirements will be verified by source test.

CHSC 42301.6 Sources within 1000 feet from a school site.

Since there are no expected hexane emission increases at this facility, public notification will not be required.

VIII. RECOMMENDATION:

Issue Authority to Construct as shown on the attached draft.

IX. BILLING INFORMATION:

Rule 3020: Schedule 1 Electrical Motor Horsepower Schedule

Motor Size: 870.5 HP $ 665.00 (302-01 G)

VOC Source Test Results for Hexane Recovery and Oil Extraction Unit, Permit Unit C-41-9-1

ANDERSON CLAYTON
3325 Figarden Drive
Fresno, CA 93711

Attn: Steve White

VOLATILE ORGANIC COMPOUNDS TESTING
MOS SCRUBBER SYSTEM

April 29, May 5, May 27 & June 11, 1998

Prepared by
AIRx TESTING
2175 Goodyear Avenue Unit #105
Ventura, CA 93003

Job Number
16031

Laboratory Report Number
397-010

Test Team Leader
Cam Donnahoo

Results Verified By:
Tom Porter
Partner

Submitted
July 16 , 1998

AIRx TESTING

VOC's EMISSION SUMMARY

	Run #1	Run #2	Run #3	Average
4/29/98				
Volatile Orgainic Compounds				
lb/hr (Outlet)	1.64	1.67	1.27	*1.52*
lb/hr (Inlet)	6.93	7.40	7.07	*7.14*
Reduction, %	-	-	-	*78.7*
Exhaust Flowrate, DSCFM	-	-	-	*49*
5/5/98				
Volatile Orgainic Compounds				
lb/hr (Outlet)		4.61		*4.61*
lb/hr (Inlet)		37.55		*37.55*
Reduction, %		-		*87.8*
Exhaust Flowrate, DSCFM				*49*
5/27/98				
Volatile Orgainic Compounds				
lb/hr (Outlet)	10.12	14.53	11.19	*11.95*
lb/hr (Inlet)	11.30	15.04	7.10	*11.15*
Reduction, %				*0.0*
Exhaust Flowrate, DSCFM				*46*
6/11/98				
Volatile Orgainic Compounds				
lb/hr (Outlet)	41.95	32.96		*37.46*
lb/hr (Inlet)	33.78	71.62		*52.70*
Reduction, %				*28.9*
Exhaust Flowrate, DSCFM				*46*

Attachment E

Summary of PM10 Emission Factors for Cottonseed Oil Mills Prepared by Fresno County APCD, 4/10/1991

FRESNO COUNTY
AIR POLLUTION CONTROL DISTRICT

COPY

ENGINEERING REVIEW

OF

PRODUCERS COTTONSEED OIL MILL
2365 E. NORTH
FRESNO, CA 93721

SHUTDOWN OF COTTONSEED OIL MILL

Prepared By:

Roger A. Isom
Air Quality Engineer II

Reviewed By:

Martin Keast
Supervising Air Quality Engineer

4/10/91

ATTACHMENT C

Post-it™ brand fax transmittal memo 7671	# of pages ▸
To L. Stern	From R. McVaigh
Co. ARB	Co. SJVUAPCD
Dept.	Phone #
Fax # 1-916-445-5025	Fax #

PM10 EMISSIONS

COPY

P/O#1030040101 - Unloading and Storage

Emissions from this process are mostly fugitive; and therefore, not verifiable. Hence, no credits will be granted for this operation.

P/O#1030040102 - Cleaning and Delinting

This is the largest source of PM10 emissions in the facility. Emissions will be calculated by using source test results (see attached) and applying them throughout the delinting stage.

Processes: Seed Cleaning
1st Cut Lint Cleaning
2nd Cut Lint Cleaning
1st Cut Lint Beaters
2nd Cut Lint Beaters
Motes
Bates Press Room

[Please note, that emissions from these processes are only from cottonseed,and not safflower.]

PM10 Emissions =
(source test results) x (# cyclones) x (Tonnage) x (PM10 Fraction)

Seed Cleaning:

12-44 " "2D-2D" cyclones
Test = .008 g/dscf > per cyclones
= .012 lb/ton

$$\text{Emissions} = (.012\ \text{lb/ton})\ (12\ \text{cyclones})(245.9\ \text{tons/day})\left(0.5\frac{\text{lbPM10}}{\text{lbPM}}\right)$$

PM10 = 17.7 lb/day

1st Cut Lint Cleaning -

16-36" "2D-2D" cyclone
Test = .007 g/dscf> cyclone
.08 lb/ton

$$\text{Emissions} = (.08\ \text{lb/ton})(16\ \text{cyclones})(245.9\frac{\text{tons/day}}{})\left(0.5\ \frac{\text{lbpm10}}{\text{lbPM}}\right)$$

PM10 = 131.0 lb/day

2nd Cut Lint Cleaning -

32-364 "1D-3D" cyclones
Test = .021 g/dscf
> per cyclone
.022 lb/ton

Emissions = (.~~22~~ .022 lb/ton)(32 cyclones)245.9 tons/day)(0.5lbPM10/lbPM)

PM10 = 86.56 lb/day

1st Cut Lint Beaters -

4-30" "20-2D" cyclones

Test = .21 g/dscf
> per cyclone
.019 lb/ton

Emissions = (.019 lb/ton)(4 cyclones)(245.9tons/day)(.5lbPM10/lbPM)

PM10 = 9.34 lb/day

2nd Cut Lint Beaters

8-26""10-30" Cyclones

Test = 0.41 g/dscf
> per cyclone
.039 lb/bale

Emissions = (.011 lb/ton)(8 cyclones)(245.9 tons/day)(0.5lbPM10/lbPM)

PM10 = 10.82 lb/day

COPY

Bake Press Room

3-62" "1D-3D"
1-36" "2D-2D"
1-26 "2D-2D"

Test = .072 g/dscf
> per cyclone ("20-2D")
.24 lb/ton

$$PM10 = (.24 lb/ton)(245.9 tons)(3 \text{ cyclones})(0.5 \frac{lb PM10}{lb PM10})$$

PM10 = 92.21 lb/day

P/O#1030040103 - Hulling & Separating Room

Results from the RANCHERS COTTON OIL MILL will be used since no source test results exist from PRODUCERS.

Source Tests Results = 1.47 lb/hr = .098 lb/ton (TOTAL)

(Ranchers 8/24-8/25/76 Chronocology) 15 tons/hr

$$PM10 = (245.9 tons/day)(.098 lb/ton)(0.5 \frac{lb PM10}{lb PM10})$$

PM10 = 12.05 lb/day For Cottonseed

$$PM10 = (136.7 tons)(.098 lb/day)(0.5 \frac{lb PM10}{lb PM10})$$

PM10 = 6.7 lb/day for Safflower

TOTAL = 18.75 lb/day

For the rest of the plant, no actual source testing was performed. An average lb/ton emission factor from the source test results will be used since it was not documented if the tests were performed an "1D-3D" or "2D-2d" cyclones, the average lb/ton emission factor for "2D-2D" cyclones will be used for all cyclones. The average emission factor based on source test results (see attached summary) is 0.06 $\frac{\text{lbPM}}{\text{ton}}$ (per cyclone).

P/O# 1030040104 - Solvent Extraction

PM10 emissions from meal handling

1-"1D-2D" cyclone @ 15415 cfm

$$\text{PM10} = (.06\ \tfrac{\text{lbPM}}{\text{ton}})(245.9\ \tfrac{\text{tons}}{\text{day}})(0.5\ \tfrac{\text{lbPM10}}{\text{lbPM10}})$$

PM10 = 7.4 lb/day

P/O#1030040105 - Bulk Meal Storage

PM emissions are from meal loading for both cottonseed and safflower.

4-"2D-2D" cyclones

$$\text{PM10} = (.06\tfrac{\text{lbPM}}{\text{ton}})(4\ \text{cyclones})(245.9+136.7\tfrac{\text{tons}}{\text{day}})(0.5\tfrac{\text{lbPM10}}{\text{Pm10}})$$

$$\text{PM10} = 45.9\ \frac{\text{lb}}{\text{day}}$$

P/O#1030040106 - Meal Processing

PM10 emissions from cotton seed and safflower

2 - Baghouses
5 - "1D-3D" cyclones

$$\text{PM10} = (.06\tfrac{\text{lbPM}}{\text{ton}})(5\ \text{cyclones})(245.9+136.7\tfrac{\text{tons}}{\text{day}})(\tfrac{\text{lbpm10}}{\text{lbPM}})$$

Attachment F

Potential to Emit Calculations for the Chowchilla Oil Mill Facility (Project #930468)

Table 1. Potential to Emit (PE)

Operation (PTO#)	E.F. (lb PM /ton)	Thruput ton/day	PM10/PM	# of cyclones	lb/day (ton/yr)
Receiving C-41-4-0	1.0	500	0.5	--	250 (41.88)
Seed Cleaning C-41-6-1	0.012	500	0.5	15	45 (7.54)
1st Cut Linter C-41-5-0	0.08	500	0.5	7	140 (23.45)
2nd Cut Linter C-41-7-0	0.022	500	0.5	17	93.5 (15.66)
Hulling C-41-8-1	0.09	500	0.5	5	112.5 (18.84)
Storage & Loading C-41-10-0 & C-41-13-0	0.01 gr/dscf	2664 scfm	34560 min/day	1lb/ 7000 gr	131.5 (22.03)
Hull Storage C-41-14-0	0.06	500	0.5	1	15.0 (12.56)
Boiler PM10 C-41-12-0	0.005 lb/MMBtu	13.5 MMBtu/hr	24 hr/day	--	43.1 (7.22)
TOTAL PM10	--	--	--	--	**830.6 (139.12)**
Hexane Loss C-41-9-0 & C-41-11-0	5.58 lb VOC/ton	500	--	--	2,791 (467.5)
Boiler VOC	0.003 lb/MMBtu	13.5 MMBtu/hr	24 hr/day	--	0.96 (0.16)
TOTAL VOC	--	--	--	--	**2,792 (467.66)**
Boiler NOx (PENOx)	0.133 lb/MMBtu	13.5 MMBtu/hr	24 hr/day	--	43.1 (7.22)
Boiler CO (PECO)	0.033 lb/MMBtu	13.5 MMBtu/hr	24 hr/day	--	10.7 (1.79)
Boiler SOx (PESOx)	0.001 lb/MMBtu	13.5 MMBtu/hr	24 hr/day	--	0.3 (0.05)

Attachment G

AP-42 Emission Factors for Natural Gas Combustion

Table 1.4-1. EMISSION FACTORS FOR NITROGEN OXIDES (NO_x) AND CARBON MONOXIDE (CO) FROM NATURAL GAS COMBUSTION[a]

Combustor Type (MMBtu/hr Heat Input) [SCC]	NO_x[b]		CO	
	Emission Factor ($lb/10^6$ scf)	Emission Factor Rating	Emission Factor ($lb/10^6$ scf)	Emission Factor Rating
Large Wall-Fired Boilers (>100) [1-01-006-01, 1-02-006-01, 1-03-006-01]				
Uncontrolled (Pre-NSPS)[c]	280	A	84	B
Uncontrolled (Post-NSPS)[c]	190	A	84	B
Controlled - Low NO_x burners	140	A	84	B
Controlled - Flue gas recirculation	100	D	84	B
Small Boilers (<100) [1-01-006-02, 1-02-006-02, 1-03-006-02, 1-03-006-03]				
Uncontrolled	100	B	84	B
Controlled - Low NO_x burners	50	D	84	B
Controlled - Low NO_x burners/Flue gas recirculation	32	C	84	B
Tangential-Fired Boilers (All Sizes) [1-01-006-04]				
Uncontrolled	170	A	24	C
Controlled - Flue gas recirculation	76	D	98	D
Residential Furnaces (<0.3) [No SCC]				
Uncontrolled	94	B	40	B

[a] Reference 13. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. To convert from $lb/10^6$ scf to $kg/10^6$ m^3, multiply by 16. Emission factors are based on an average natural gas higher heating value of 1,020 Btu/scf. To convert from *lb/10 ^{6}scf to lb/MMBtu, divide by 1,020.* The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. SCC = Source Classification Code. ND = *no data.* NA = *not applicable.*

[b] Expressed as NO_2. For large and small wall fired boilers with SNCR control, apply a 24 percent reduction to the appropriate NO_x emission factor. For tangential-fired boilers with SNCR control, apply a 13 percent reduction to the appropriate NO_x emission factor.

[c] Pre-NSPS=New Source Performance Standard as defined in 40 CFR 60 Subparts D and Db. Post-NSPS units are boilers with greater than 250 MMBtu/hr of heat input that commenced construction modification, or reconstruction after August 17, 1971, and units with heat input capacities between 100 and 250 MMBtu/hr that commenced construction modification, or reconstruction after June 19, 1984.

TABLE 1.4-2. EMISSION FACTORS FOR CRITERIA POLLUTANTS AND GREENHOUSE GASES FROM NATURAL GAS COMBUSTION[a]

Pollutant	Emission Factor ($lb/10^6$ scf)	Emission Factor Rating
CO_2[b]	120,000	A
Lead	0.0005	D
N_2O (Uncontrolled)	2.2	E
N_2O (Controlled-low-NO_X burner)	0.64	E
PM (Total)[c]	7.6	D
PM (Condensable)[c]	5.7	D
PM (Filterable)[c]	1.9	B
SO_2[d]	0.6	A
TOC	11	B
Methane	2.3	B
VOC	5.5	C

[a] Reference 13. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. Data are for all natural gas combustion sources. To convert from $lb/10^6$ scf to $kg/10^6$ m^3, multiply by 16. To convert from $lb/10^6$ scf to lb/MMBtu, divide by 1,020. The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. TOC = Total Organic Compounds. VOC = Volatile Organic Compounds.

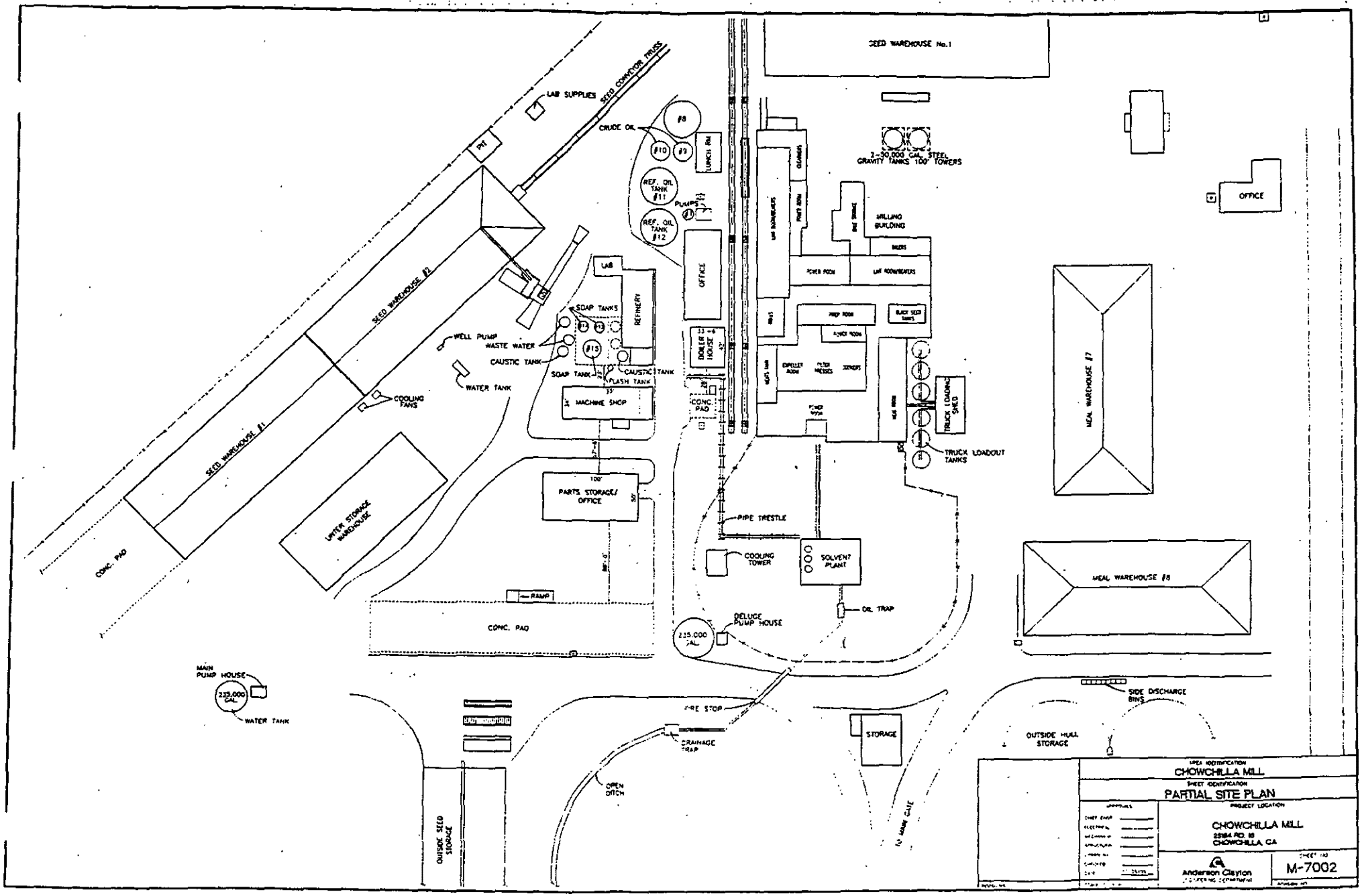
[b] Based on approximately 100% conversion of fuel carbon to CO_2. $CO_2[lb/10^6 scf] = (3.67)(CON)(C)(D)$, where CON = fractional conversion of fuel carbon to CO_2, C = carbon content of fuel by weight (0.76), and D = density of fuel, 4.2×10^4 $lb/10^6$ scf.

[c] All PM (total, condensible, and filterable) is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors presented here may be used to estimate PM_{10}, $PM_{2.5}$ or PM_1 emissions. Total PM is the sum of the filterable PM and condensible PM. Condensible PM is the particulate matter collected using EPA Method 202 (or equivalent). Filterable PM is the particulate matter collected on, or prior to, the filter of an EPA Method 5 (or equivalent) sampling train.

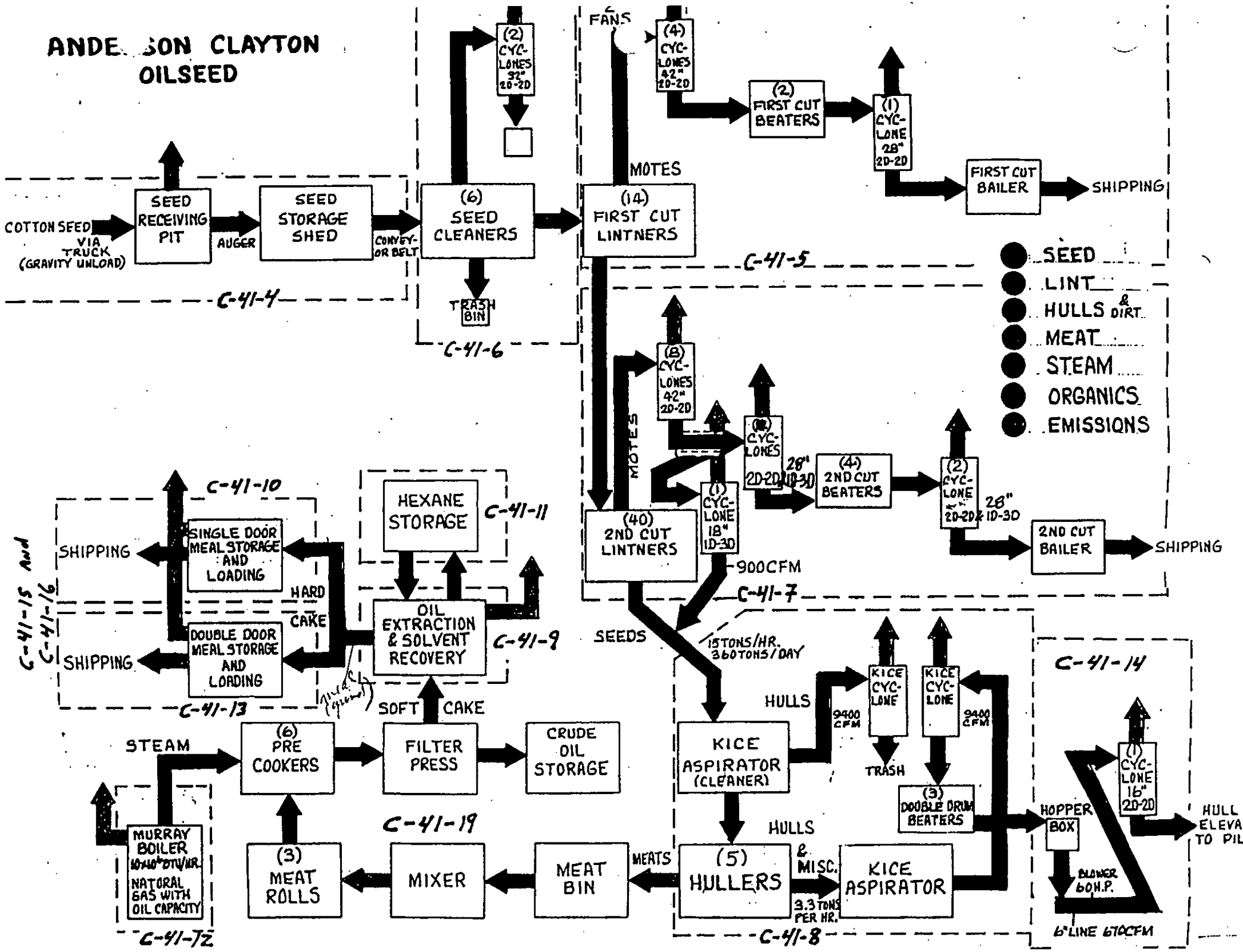
[d] Based on 100% conversion of fuel sulfur to SO_2. Assumes sulfur content is natural gas of 2,000 grains/10^6 scf. The SO_2 emission factor in this table can be converted to other natural gas sulfur contents by multiplying the SO_2 emission factor by the ratio of the site-specific sulfur content (grains/10^6 scf) to 2,000 grains/10^6 scf.

Attachment H

Facility and Process Flow Diagrams


SEED WAREHOUSE No.1
OFFICE
2-30,000 GAL. STEEL GRAVITY TANKS 100' TOWERS
MILLING BUILDING
MEAL WAREHOUSE #7
MEAL WAREHOUSE #8
TRUCK LOADOUT TANKS
TRUCK LOADING SHED
SEED WAREHOUSE #2
SEED WAREHOUSE #1
LAB SUPPLIES
SEED CONVEYOR TRUSS
PIT
CRUDE OIL
#8
#10
#9
LUNCH RM
REF. OIL TANK #11
REF. OIL TANK #12
PUMPS
LAB
REFINERY
SOAP TANKS
#14
#13
#15
WELL PUMP
WASTE WATER
CAUSTIC TANK
SOAP TANK
CAUSTIC TANK
FLASH TANK
WATER TANK
COOLING FANS
MACHINE SHOP
CONC. PAD
DOUBLE HOUSE
PARTS STORAGE/ OFFICE
LATER STORAGE WAREHOUSE
CONC. PAD
RAMP
PIPE TRESTLE
COOLING TOWER
SOLVENT PLANT
OIL TRAP
DELUGE PUMP HOUSE
225,000 GAL.
MAIN PUMP HOUSE
225,000 GAL.
WATER TANK
FIRE STOP
DRAINAGE TRAP
OPEN DITCH
OUTSIDE SEED STORAGE
STORAGE
OUTSIDE HULL STORAGE
SIDE DISCHARGE BINS
TO MAIN GATE
AREA IDENTIFICATION
CHOWCHILLA MILL
SHEET IDENTIFICATION
PARTIAL SITE PLAN
PROJECT LOCATION
CHOWCHILLA MILL
23984 RD. 18
CHOWCHILLA CA
Anderson Clayton
M-7002

ANDERSON CLAYTON OILSEED



Attachment I

Permit Unit Requirements for Equipment Remaining in Service at the Chowchilla Oil Mill

CONDITIONS FOR PERMIT C-41-4-0

INSPECTION WORKSHEET

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
659 HP SEED RECEIVING OPERATION INCLUDING SEED RECEIVING PITS, STORAGE HOUSES AND PILES, AND RELATED CONVEYING EQUIPMENT.

CONDITIONS

1. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. 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]
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
5. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100]
6. The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081]
7. Records of daily cotton seed throughput shall be maintained, retained on the premises for at least two years and made available for District inspection upon request. [District Rule 1070]

(Extension)

CONDITIONS FOR PERMIT C-41-10-1

INSPECTION WORKSHEET

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
815 HP MEAL LOADING AND STORAGE OPERATION NORTH, INCLUDING FLOOR SCREW CONVEYOR IN MEAL HOUSE WITH THREE DOORS, SERVED BY ONE 32" 1D-3D CYCLONE AND A BAGHOUSE DUST COLLECTOR (THE CYCLONE AND BAGHOUSE ALSO SERVE PTO #C-41-13-1).

CONDITIONS

1. {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]
2. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. The meal house doors shall remain closed during receiving or shipping of meal at the meal house. [District Rule 2201]
4. Throughput of meal shall not exceed 270 tons per day. [District Rule 2201]

INSPECTION WORKSHEET

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
30,000 GALLON CAPACITY ABOVEGROUND HEXANE STORAGE TANK.

CONDITIONS

1. {271} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
2. {234} The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081]
3. Records of daily amount of solvent (hexane) throughput shall be maintained, retained on the premises for at least two years and made available for District inspection upon request. [District Rule 1070]

INSPECTION WORKSHEET

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
101 HP MEAL LOADING AND STORAGE OPERATION SOUTH, INCLUDING FLOOR SCREW CONVEYOR IN MEAL HOUSE WITH DOUBLE DOORS, SERVED BY ONE 32" 1D-3D CYCLONE AND A BAGHOUSE DUST COLLECTOR (CYCLONE AND BAGHOUSE ALSO SERVE PTO #C-41-10-1).

CONDITIONS

1. {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]
2. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. The meal house doors shall be closed during recieving or shipping of meal at the meal house. [District Rule 2201]
4. Throughput of meal shall not exceed 275 tons per day. [District Rule 2201]

INSPECTION WORKSHEET

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
60 HP HULL STORAGE PILE SERVED BY 1-20" 2D-2D CYCLONE.

CONDITIONS

1. {12} Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
2. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. {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]
4. {271} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
5. {234} The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081]
6. Records of daily seed throughput shall be maintained, retained for at least two years and made available for District inspection upon request. [District Rule 1070]

INSPECTION

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

WORKSHEET

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
208 HP DIESEL-FUELED CUMMINS ENGINE, WITH TURBOCHARGER AND AFTERCOOLER, POWERING AN EMERGENCY FIRE PROTECTION STANDBY PUMPING SYSTEM.

CONDITIONS

1. {271} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
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]
3. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. A daily log of operating hours shall be maintained on the premises, retained for at least two years, and made available to the District upon request. [District Rule 1070]
5. Particulate matter emission concentration shall not exceed 0.10 grains per standard dry cubic foot. [District Rule 4201]
6. The engine shall be operated only for maintenance testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance and testing purposes shall not exceed 200 hrs per year. [District Rule 2201 and 4701]
7. {310} The engine shall be equipped with a turbocharger and with an aftercooler or intercooler. [District NSR Rule]
8. {313} The sulfur content of the diesel fuel used shall not exceed 0.05% by weight. [District NSR Rule]
9. If engine operates with visible emissions greater than 1/2 Ringelmann or 10% opacity, compliance with particulate matter emissions shall be conducted by District-witnessed sample collection within 60 days of District determination. [District Rule 1081]
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
11. {309} The engine shall be equipped with a non-resettable elapsed-time meter indicating total hours of operation. [District NSR Rule]

Attachment J

AP-42 Emission Factors for Grain Processing Facilities, Table 9.9.1-2

Table 9.9.1-2. PARTICULATE EMISSION FACTORS FOR GRAIN PROCESSING FACILITIES[a]

Type of Facility/ Emission Source	Type of Control	Filterable[b]				Condensible PM[c]			
		PM	EMISSION FACTOR RATING	PM-10[d]	EMISSION FACTOR RATING	Inorganic	Organic	Total	EMISSION FACTOR RATING
Animal feed mills									
Grain receiving (SCC 3-02-008-02)	None	0.017[e]	E	0.0025[e]	E				
Grain cleaning (SCC 3-02-008-07)	Cyclone	(f)		(f)					
Storage	None	ND		ND					
Grain milling (SCC 3-02-008-15)									
Hammermill (SCC 3-02-008-17)	Cyclone	0.067[h]	E	(g)					
	Baghouse	0.012[j]	E	(y)					
Flaker (SCC 3-02-008-18)	Cyclone	0.15[k]	E	(g)					
Grain cracker (SCC 3-02-008-19)	Cyclone	0.024[k]	E	(g)					
Mixer	None	ND		ND					
Conditioning	None	ND		ND					
Pelletizing									
Pellet cooler[m] (SCC 3-02-008-16)	Cyclone	0.36[n]	E	(g)		–	–	0.059[p]	E
	High efficiency cyclone[r]	0.15[q]	E	(g)					
Feed shipping (SCC 3-02-008-03)	None	0.0033[e]	E	0.0008[e]	E				
Wheat flour mills									
Grain receiving (SCC 3-02-007-31)	None	(f)		(f)					
Grain handling (SCC 3-02-007-32) (legs, belts, etc.)	None	(f)		(f)					

Attachment K

Seed/Meal Processing and Handling (Project #970202)

APPLICATION REVIEW
Project #: 970202
Application #: C-41-19-0
Deemed Complete: 04/16/97

Engineer: Hashim Navrozali
Date: August 14, 1997

Facility Name: Anderson Clayton Corp. - Chowchilla Mill
Mailing Address: P.O. Box 12506
Fresno, CA 93778-2506

Contact Name: Steven White
Phone: (209) 446-6420

I. PROPOSAL

Facility's primary business is cotton seed oil processing. Anderson Clayton Corporation is proposing to modify its existing cotton seed meats expansion/preparation room, at the Chowchilla Oil Mill . The meats preparation room was previously considered to be part of the solvent extraction facility (C-41-9). The applicant is now requesting that this operation be treated as a separate permit unit, since it can be independently operated (the prepared meats can be stockpiled and do not have to be continuously fed into the solvent extraction system). The preparation room will be designated a new permit number (i.e. C-41-19). The applicant is further proposing to modify the meats preparation operation by adding a flaking mill, a steam cooker, and a meats cooler/dryer (using an air circulation system), and associated conveying equipment (refer to Diagram #101-1 in Attachment 1) to existing processing system. Particulate Matter (PM) emissions from the flaking mill and cooler/dryer will be served by 1D-3D cyclones.

The existing seed preparation room consists of three meat crushing rolls, the cotton seeds are cracked and then directly fed into a pre-cooker and conditioned with steam (refer to Diagram #100-1 in Attachment 1). After pre-cooking the meats are transferred to a series of expellers where over 75% of vegetable oil is removed. The hard meats from the expeller units are subsequently routed to a hexane pre-press solvent unit where the remainder of the oil is extracted and solvent recovered. The new oil extraction system will involve using the same meat crushers, but the existing expellers will be removed. The process will now use a flaking mill, a cooler/dryer, and a set of expanders to make the meats porous. Oil will not be removed in the new cotton seed preparation room. The prepared meats or collets (bearing 100% of the oil) will now be routed directly to the solvent extraction area (C-41-9) for extraction of oil. Total meats processed will remain unchanged at 600 tons/yr (refer to ATC #C-41-9-2; this ATC is pending conversion into a PTO).

II. APPLICABLE RULES

Rule 2020 Exemptions (Adopted September 19, 1991; Last Amended July 21, 1994)

Rule 2201 New and Modified Stationary Source Review Rule (Adopted September 19, 1991; Last Amended June 15, 1995)

Rule 4101 Visible Emissions (Adopted May 21, 1992; Amended Dec 17, 1992)

Rule 4102 Nuisance (Adopted May 21, 1992; Amended Dec 17, 1992)

Rule 4201 Particulate Matter Concentration (Adopted May 21, 1992; Amended Dec 17, 1992)

Rule 4202 Particulate Matter - Emission Rate (Adopted May 21, 1992; Amended Dec 17, 1992)

Rule 4691 Vegetable Oil Processing Operations (Adopted April 11, 1991; Amended December 17, 1992)

III. PROJECT LOCATION

Equipment will be located at: 25184 Road 16, Chowchilla, CA.

The applicant states that the facility is not within 1,000 feet of the outer boundary of a school site, so the public noticing requirement of California Health and Safety Code 42301.6 shall not apply. The project is located in a CO attainment area.

IV. PROCESS DESCRIPTION

The primary purpose of the cotton seed meats expansion/preparation plant is to convert meats into porous oil bearing pellets known as collets. The meats are first separated from hulls of the cotton seeds by a series of dehullers, delinters, and scalpers (Permit Units C-41-5, 6, 7, & 8), and then routed to the preparation plant for further processing (see Attachment 1 for process flow diagram #101). At the preparation plant, the meats are mixed with water and then run through three fully enclosed crushing rolls (no particulate matter emissions are expected, since the crushers are not vented to atmosphere. Furthermore, the high moisture content of the process, prevents dust or meat fragments to enter the air stream). The moisture laden crushed meats are then fed through a flaking mill consisting of two 1500 mm x 600 mm, horizontally opposed metal rolls. The constant grinding action of the rolls has a potential to cause them to overheat, and exceed their normal operating temperature of 135^0 F. For this reason an aspirator fan will be used to blow cool air over the flaking rolls and keep them operating at optimum temperatures. The

aspiration air may have a tendency to trap trace quantities of flaked meat fragments and fine particles generated from the rolls. As a cautionary measure, the particulate emissions entrained in the aspirated air exhaust, will be routed through a 20" 1D-3D cyclone for control, prior to release to atmosphere. Flaked meats produced from the flaking mills will be transported through a cooker unit equipped with six perforated trays, using a mechanical incline conveyor system. The flaked meats are injected with steam (produced by a 32.0 MMBtu/hr boiler; Permit Unit C-41-12) to soften and condition them, and to assist in the oil extraction operation. Steaming the meats does not produce particulate emissions since the condensate traps any fines released by the meats transportation system. In addition, there is no aspiration air involved in the cooking process. After cooking, the meats are introduced into two parallel expander units, where there are once again treated with steam, this time under high pressure, causing the break down of the cell walls and rendering the meats extremely porous. These soft and permeable processed meats are now known as collets. The hydrated and temperate collets are now conveyed to a dryer/cooler unit for treatment. The dryer unit is served by a series of heated electric elements and an ambient air circulation system. Any particulate matter, including collet shreds and flaked meat fragments, that may be trapped in the circulating air are controlled by a 60" 1D-3D cyclone. The air stream exiting the dryer unit is laden in steam and condensates, therefore very small amounts of fine dust particles (assume negligible) are expected to be entrained therein.

The dried and cooled collets (bearing 100% of the oil) are transferred to the solvent extraction facility (C-41-9) by coil mounted shaker conveyors where all the oil is extracted (using an hexane solvent), by means of a shallow bed rectangular loop type crusher. The oil and hexane mixture known as miscella is then refined and the pure vegetable oil produced is then routed for storage. For a comprehensive description of the oil extraction and refining process and the solvent distillation/recovery system refer to Project #970201.

The maximum operating schedule for the collet processing operation is 24 hours per day, 7 days per week, 18 weeks per year.

The proposed cotton seed meat processing rate is 600 tons per day.

V. EQUIPMENT LISTING

C-41-19
903 HP Cotton seed meats preparation/expansion operation (collet producing facility) including: (4) meats feeder bins, (1) meats mixer, (3) meats crushing rolls, (1) meats flaking mill served by a 20" 600 cfm 1D-3D cyclone, (1) flaked meat steam cooker , (2) meats steam expanders, (1) collet cooler/dryer served by a 60" 10,000 cfm 1D-3D cyclone, and associated equipment including feeders and discharge conveyors.

VI. EMISSION CONTROL TECHNOLOGY EVALUATION

There are two emissions points associated with the collet manufacturing facility, that are directly vented to atmosphere, and are a source of potential Particulate Matter (PM) emissions (all other operations are fully enclosed, high moisture laden processes, and are not expected to generate any dust or fines to atmosphere):

1) *PM emissions from the 20" 600 cfm 1D-3D cyclone, serving the meats flaking mill.*
2) PM emissions from the 60" 10,000 cfm 1D-3D cyclone, serving the collets cooler/dryer.

Cyclone Design Check

A design check is performed to ensure that the size and configuration of the two cyclones is adequate in handling the corresponding air flow rates and particulate grain loading of the waste streams exiting the meats flaking mill and collet cooler/dryer systems:

According to the U.S.D.A Cotton Ginners Handbook, Dec. 1994, the recommended inlet velocity for a 1D-3D cyclone is 2,800 to 3,650 ft/min (derived from the equations listed in *Fluid Flow in Fan Engineering*, pp. 61-134. Buffalo Forge Company, Buffalo, NY, 1970). The proposed inlet velocities are calculated using the following formula.

$V = Q \div A$ where, V = inlet velocity (ft/min)
Q = air flow rate (cfm)
A = inlet area (ft^2)
= inlet height (H_c) × inlet width (B_c)

For the 1D-3D cyclones, $H_c = D_c$ and $B_c = D_c/8$, where D_c = cyclone diameter. Therefore, $A = D_c^2/8$.

20" 1D-3D cyclone serving the meats flaking mill :

Based on the maximum proposed air flow (Q) of 600 cfm, and the effective inlet area (A) of 0.35 ft^2, the inlet velocity for the 20" 1D-3D cyclone is calculated as follows:

$V = Q \div A = (600\ ft^3/min) \div (0.35\ ft^2) = 1{,}714\ ft/min.$

The inlet velocity of 1,714 ft/min for the 20" 1D-3D cyclone is below the lower end of the recommended range (i.e. 2,800 ft/min). The applicant has provided the following justifications for maintaining the inlet velocity at 1,714 ft/min:

- The manufacturer of the aspirator fan connected to the flaking mill; has recommended that the air flow rate not exceed 600 cfm. Any air flow rate exceeding this level could cause turbulence in the mill and adversely affect the function of the metal rolls serving the mill.

- The high moisture content of the flaked seed meats will cause negligible PM emissions from the mill (estimated at 0.02 gr/dscf). The applicant hence feels that the 1D-3D sizing will have a minimal impact on overall emissions.

- The primary purpose of the aspiration system connected to the flaking mill is to provide air cooling and maintain temperature of the milling rolls to within 135^0 F. Most comparable meats flaking systems are not vented to control devices, since they are considered to be insignificant emissions sources. The applicant hence feels that the installation of the 1D-3D cyclone is an added control measure, and slight undersizing of the cyclone will not impact the overall handling capacity and efficiency of the cyclone in controlling the already negligible emissions. Furthermore, a source test will be conducted to verify particulate matter grain loading in exhaust from the cyclone and appropriate changes in control parameters (i.e. cyclone size, air flow rates and product throughput) will be proposed by future permitting actions, if emissions requirements are not met.

60" 1D-3D cyclone serving the collets cooler/dryer:
Based on the maximum proposed air flow (Q) of 13,500 cfm, and the effective inlet area (A) of 4.5 ft^2, the inlet velocity for each of the 60" 1D-3D cyclones is calculated as follows:

$V = Q \div A = (10{,}000\ ft^3/min) \div (3.13\ ft^2) = 3{,}195$ ft/min.

As shown above, the inlet velocity for proposed 60" 1D-3D cyclone collector (serving the collet drying process) is within the recommended range of 2,800 - 3,650 ft/min, indicating that this cyclone is adequately sized to handle the corresponding air flow rate.

A. Best Available Control Technology (BACT) Requirement

1. Applicability

Per Rule 2201 Sections 4.1.1 and 4.1.1.1, BACT shall be applied to a new or modified emissions unit if the new unit or modification results in an increase in permitted emissions (IPE) greater than 2 pounds per day for NO_x, PM_{10}, SO_x, CO, or VOC. In a CO attainment area, the stationary source New Source Review (NSR) balance must also exceed 550 pounds per day to trigger BACT.

As shown in Section VII.C, BACT IPE for emissions from each of the two new emissions units (i.e. flaking mill & cooler/dryer) does not exceed 2 lb/day for PM_{10}. Therefore, BACT is not required for control of this pollutant.

VII. CALCULATIONS

A. Emission Factors and Assumptions

- The permitted meats processing rate shall remain unchanged at 600 tons/day, after modification of the cotton seed meat preparation/expansion facility.
- Grain loading values of particulate matter (PM) emissions in the exhaust from the 1D-3D cyclones serving the new flaking mill and collet cooler/dryer, are estimated at 0.02 gr/dscf & 0.001 gr/dscf respectively, per applicant. Anderson Clayton, Inc., has stated that the high moisture content of the process streams involved in the flaking mills and cooler/dryer system will cause very insignificant amounts of PM_{10} to be present in the aspirated air. The air streams are expected to be saturated with high levels of water droplets and oil condensates. There is no published source testing data or emission factors available for particulate matter emissions from comparable cotton seed meats flaking or collet drying operations (most existing systems are uncontrolled). A review of source tests conducted for agricultural grain flakers and dryers, including Valley Grain Products (source test conducted on 01/04/84, for a 18 MMBtu/hr corn flaker/dryer) indicated that the maximum PM grain loading in a high dust oriented process such as corn meal flaking/drying was 0.03 gr/dscf. Seed meat flaking and collet drying is a much cleaner process compared to corn meal drying since there are no husks or grain skins involved. The applicant is hence confident that the actual PM grain loading values from these operations will be almost negligible, and well below the values being proposed. The facility has agreed to verify these values by performing a source test upon issuance of an Authority to Construct (ATC), and prior to start up of the operations (a condition requiring source testing will be inserted in the ATC).

- Air flow rates from the 1D-3D cyclones serving the new flaking mill and collet cooler/dryer, are 600 cfm and 10,000 cfm respectively

- PM_{10} is 50% of total particulate matter (PM) emissions generated from the meats flaking and collet cooling/drying operations (per Rule 2201, Section 4.22.3).

- Maximum equipment operating schedule is 24 hr/day and 18 wks/yr.

B. Potential to Emit Calculation

Potential to Emit

The existing emissions of PM_{10} from the cotton seed meat preparation operations are considered to be insignificant. All meat processing equipment (including conveyors, roll crushers, and expellers) are fully enclosed and not vented to atmosphere. As mentioned earlier, the facility is proposing to remove existing expellers and install a meat flaking and expansion system which will make the meats porous and permeable, but retain 100% of the oil within the cell membranes. The oil bearing conditioned meats (collets) will subsequently be routed to the solvent extraction facility for further processing. The addition of the flaking

mill and air assisted collet cooling/drying system will cause a small amount PM_{10} emissions (including meat/collet fragments and flakes) to be generated and emitted to atmosphere. This quantity of PM must be calculated and added to the overall permitted emissions of Permit Unit C-41-19 (meats preparation facility), as show below:

PM_{10} (flaking mill) = [grain loading, gr/dscf]x[air flow rate, dscf/min]x[60 min/hr] x [24 hrs/day]x[1 lb/7000 grains]x[0.5 lb-PM_{10} / lb-PM]

= [0.02 gr PM/dscf]x[600 cfm]x[60 min/hr]x[24 hrs/day]x [1 lb/7000 grains]x[0.5 lb-PM_{10} / lb-PM]

= 1.23 lb-PM_{10}/day

PM_{10} (collet cooler/dryer) = [grain loading, gr/dscf]x[air flow rate, dscf/min]x[60 min/hr] x [24 hrs/day]x[1 lb/7000 grains]x[0.5 lb-PM_{10} / lb-PM]

= [0.001 gr PM/dscf]x[10000 cfm]x[60 min/hr]x[24 hrs/day]x [1 lb/7000 grains]x[0.5 lb-PM_{10} / lb-PM]

= 1.03 lb-PM_{10}/day

Potential to Emit $_{\text{(Permit Unit C-41-19)}}$ = 1.23 + 1.03 = **2.3 lb-PM_{10}/day**

Increase in Permitted Emissions (IPE) = Post-project Emissions - Pre-project Emissions

= (2.3 - 0) lb-PM_{10}/day

= **2.3 lb-PM_{10}/day**

C. BACT Determination

According to NSR Section 4.1.1, BACT is triggered if increase in permitted emissions (BACT IPE) is > 2 lbs/day for a new or modified emissions unit, as calculated per Section 6.0.

The meats flaking cyclone and collet cooler/dryer are two new emissions units being added to the meats preparation facility. BACT IPE is calculated as follows for each of the two new units:

BACT IPE = PE
Where: PE = Potential to Emit for the new emissions unit.

BACT $IPE_{FLAKING\ MILL}$ = PE = 1.23 lb-PM_{10}/day (as calculated in Section VII.B)

BACT $IPE_{COOLER/DRYER}$ = PE = 1.03 lb-PM_{10}/day (as calculated in Section VII.B)

Since BACT IPE < 2 lb/day for PM_{10} emissions from flaking mill and collet cooler/dryer, BACT will not be triggered for this pollutant.

D. Facility New Source Review (NSR) Balance:

According to Section 6.1.4 of NSR Rule 2201, the stationary source NSR balance for PM_{10}, SO_X, and CO must be determined (for a CO attainment area). The NSR balance is equal to the sum of the daily potential to emit (PE) for all emission units installed after the baseline date (May 21, 1979 - Madera County).

The facility was in operation prior to the May 1979 at its present capacity of 600 ton/day of seed. All modifications documented in the facility's source file have caused a decrease in the emissions from the facility. Pursuant to section 6.6 of Rule 2201, the pre-project NSR Balance for PM10, SOx and CO is set equal to zero since the cumulative net emissions change for the facility since 1979 less than zero.

The post-project NSR balance for PM_{10}, CO, and SOx, is presented Table 1:

Table 1: Facility NSR Balance, lbs/day

Project #	Permit #	Description	PM_{10}	CO	SO_x
		Pre-Project NSR Balance	0	0	0
970528	C-437-27	IPE due to current project	2.3	0	0
		Post-Project NSR Balance	2.3	0	0
Offset Thresholds			80	550	150

As shown in Table 1, the NSR balance for PM_{10}, CO, and SOx continues to be below the offset threshold levels hence facility will not be subject to offset requirements for these pollutants.

E. Stationary Source Potential to Emit (SSPE)

Pursuant to Section 4.2.3 of the NSR rule, offsets are triggered when a new or modified stationary source potential to emit (SSPE) exceeds 10 tons per year for either NOx or VOCs (in a CO attainment area).

The proposed system only emit PM_{10} in significant amounts, hence its contribution to the facility SSPE for NOx and VOC, will be zero. Since the change in facility SSPE for will be zero, after implementation of this project, offsets will not be triggered.

F. Major Source/Title I Modification Determination

The facility is an existing major source (existing potential to emit of the stationary source for VOC emissions exceed the 50 ton/yr major source limit; per Rule 2201, Section 3.19). Therefore, the project does not constitute formation of a new major source or Title I modification.

G. Notification and Publication of Preliminary Decision

According to Sections 5.1.3.4.3 through 5.1.3.4.5 of the NSR rule, public notification is required for new and modified sources with an increase in permitted emissions for those pollutants reaching the NSR Balance notification thresholds (equal to or greater than 140 lb SOx/day, 70 lb PM_{10}/day, or 550 lb CO/day). As shown in Table 1 of this report the post-project NSR balance of PM_{10} (the only affected pollutant from this project) is 2.3 lb/day.

Therefore, public notification pursuant to Rule 2201 Sections 5.1.3.4.3 through 5.1.3.4.5 is not triggered.

H. Daily Emission Limitations (DELs)

According to Section 5.1.9.2 of the NSR Rule 2201, a Permit to Operate shall include daily emission limitations (DEL) which reflect applicable emission limits including the offset requirements. The DELs for the permitted seed meats preparation operation shall be represented by the following conditions:

- Seed meat processing rate shall not exceed 600 tons/day.
- Particulate Matter (PM) grain loading in exhaust from the 1D-3D cyclone serving the flaking mill shall not exceed 0.02 gr/dscf.
- Particulate Matter (PM) grain loading in exhaust from the 1D-3D cyclone serving the cooler/dryer shall not exceed 0.001 gr/dscf.
- Total PM_{10} emissions from the meats preparation/expansion operation shall not exceed 2.3 lb/day.

Although the maximum design flow-rate (dscfm) through the 1D-3D cyclones in combination with grain loading factor (gr/dscf) are adequate to enforce DEL (assuming continuous operation for 24 hr/day), the facility process weight limit (tons of meats processed/day) will also be included to ensure correct sizing of the cyclone collector control systems.

VIII. COMPLIANCE

Rule 2201: New and Modified Stationary Source Review

Section 4.1.1 requires BACT if emissions from a new or modified unit results in an Increase in Permitted Emissions (BACT IPE) greater than 2 pounds per day.

As shown in section VIIC of this document, BACT IPE for PM_{10} (the only affected pollutant from this project) from each of the two new emissions units (i.e. flaking mill and collet cooler/dryer) is < 2.0 lb/day, hence BACT will not be triggered for this pollutant.

Offsets are required if pollutant emissions exceed the trigger levels set in Section 4.2.2.1 and 4.2.3 for stationary source NSR balance and stationary source potential to emit (SSPE), respectively.

As shown in Table 1 of this report, the NSR balance for PM10 (the only affected pollutant from this stationary source) is 2.3 lb/day, which is below the designated offset threshold level of 80 lb PM10/day, therefore offsets are not required for this pollutant.

Since the proposed equipment only emits PM10, the facility SSPE balance for VOCs, and NOx will remain unchanged ($SSPE_{after} = SSPE_{before}$, and Δ SSPE = 0). Therefore, offsets will not be required for these pollutants.

According to Section 5.1.3.4.4 new sources and modifications with an NSR balance of 70 pounds PM10 per day or greater and an increase in permitted emissions of PM10 are required to comply with public notification procedures.

As shown in Table 1, facility NSR balance for PM10 is 2.3 lb/day. Hence public notification requirements will not be triggered.

Section 5.1.9.2 requires enforceable conditions to be included to reflect applicable emission limits. This requirement will be satisfied by included the DELs listed in Section VII.H of this document on Permit C-41-19-0.

Facility should comply with this Rule.

Rule 4101: Visible Emissions

Visible emissions are expected to be less than Ringelmann No.1. As indicated in Section VI of this report, the exhaust streams from the meats preparation facility are saturated with high levels of water vapor and trace quantities of oil and meat/collet fragments. The processes are not expected to generate any fugitive dust or smoke. In addition, the 1D-3D cyclones that serve the only two emission points in this plant (i.e. the meats flaking mill and collet cooler/dryer) should be instrumental in controlling any incidental particulate matter entrained in the exhausts. This should reduce any visible fugitive dust emissions. Continued compliance is therefore expected.

Rule 4102: Nuisance

A review of past inspection reports has shown no complaints or nuisance conditions due to the particulate matter emissions from existing meats preparation/expansion operations at this facility. This project is expected to result in very insignificant emissions increases (i.e. 2.3 lb PM10/day), and should not create any undesirable or adverse conditions. Therefore continued compliance is expected.

The risk from this project was reviewed by performing a prioritization in accordance with the requirements of the CAPCOA prioritization guidelines. The resulting prioritization score from this project is 0.00011 (see Attachment 4). Pursuant to District Risk Management Policy for New and Modified Sources, BACT for toxic emission control (T-BACT) is not required for projects with prioritization scores of less than one, and no further risk analysis is required.

Rule 4201: Particulate Matter Concentrations

Section 3.0 requires emissions of dust, fumes or particulate matter not to exceed 0.1 grains/dscf.

As shown in section VIIA, the PM grain loading in the exhaust from the 1D-3D cyclones serving the meats flaking mill and collet cooler/dryer is not expected to exceed 0.02 gr/dscf and 0.001 gr/dscf respectively.

Therefore, compliance with this rule is expected

Rule 4202 Particulate Matter - Emission Rate

Section 4.1 sets the maximum allowable particulate emission rates as a function of process weight rate. Based on the maximum process rate of 25 tons per hour, the maximum allowable particulate emission rate for this operation can be calculated as follows:

$E = 3.59\ P^{0.62}$

where; E = Allowable particulate emission rate, lbs/hr
P = Process rate (≤30 tons/hr)
$E = 3.59 \times 25^{0.62} = 26.4$ lb PM/hr

The maximum potential emission rate of particulate matter (PM) from this seed meats processing operation is 4.6 lb/hr (assume 0.5 lb-PM_{10} / lb-PM), which is lower than the specified limit.

Therefore compliance with this rule is expected.

Rule 4691: Vegetable Oil Processing Operations

According to Section 1.0, the purpose of this rule is to limit VOC emissions from vegetable oil processing operations and to provide the administrative requirements for recording and measuring emissions.

As discussed in section IV (Process Description) of this report, the only pollutant expected to be emitted from the meats preparation/expansion room (Permit Unit C-41-19) is PM_{10}. The equipment in the preparation room will not be used to extract oil or treat the meats with VOC

containing solvents. All vegetable oil extraction and solvent recovery operations will be administered in a separate plant located on the facility premise (Permit Unit C-41-9). As shown in Project #970201, the VOC emissions from the solvent recovery plant continue to be in compliance with this rule.

IX. RECOMMENDATION

Compliance with all applicable prohibitory rules and regulations is expected. Recommend issuance of ATC # C-41-19-0 with following permit conditions:

see attached draft ATC

X. BILLING INFORMATION

The $60.00 application filing fees have been paid.

For Permit to Operate annual renewals, the following renewal fees (based on Rule 3010) shall apply):

PTO #	Description	Schedule #	Fee
C-41-19-0	903 HP seed meats preparation/expansion operation	1G	$ 698

Attachments:

1) Layout diagrams of seed meats processing facility (Diagram #s 100-1 & 101-1)
2) Existing PTO #C-41-9-1 & ATC #C-41-9-2
3) Draft ATC #C-41-19-0
4) Poject risk prioritization score

SAN JOAQUIN VALLEY APCD

ATTN FINANCE DEPARTMENT

1990 E GETTYSBURG

FRESNO , CA 93726

RECEIVED

MAR 2 6 2001

ADMIN. SERVICES
SJVUAPCD

PROOF OF PUBLICATION

COUNTY OF FRESNO
STATE OF CALIFORNIA

EXHIBIT A.

PUBLIC NOTICE

#119498

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 Anderson Clayton Corp./Oil Mill for emission reduction generated by the shutdown of equipment at the Chowchilla Oil Mill (Facility ID C-41) represented by Permit Unit Requirements (PURs) C-41-5-0, C-41-6-1, 0-41-7-0, C-41-8-1, C-41-9-1, C-41-12-1, C-41-15-0, C-41-16-0 and C-41-19-2, at 25184 Road 16 in Chowchilla, CA. The quantity of ERCs to be issued is 327,870 lb-VOC/yr, 3,047 lb- NOx/yr, 2,792 lb-CO/yr, 79,078 lb-PM10yr, and 49 lb-SOx/yr.

No comments were received following the District's preliminary decision on this project.

The application review for Project #C 1010009 is available for public inspection at the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.

(Pub: March 21, 2001)

The undersigned states:

McClatchy Newspapers in and on all dates herein stated was a corporation, and the owner and publisher of The Fresno Bee.

The Fresno Bee is a daily newspaper of general circulation now published, and on all-the-dates herein stated was published in the City of Fresno, County of Fresno, and has been adjudged a newspaper of general circulation by the Superior Court of the County of Fresno, State of California, under the date of November 22, 1994, Action No. 520058-9.

The undersigned is and on all dates herein mentioned was a citizen of the United States, over the age of twenty-one years, and is the principal clerk of the printer and publisher of said newspaper; and that the notice, a copy of which is hereto annexed, marked Exhibit A, hereby made a part hereof, was published in The Fresno Bee in each issue thereof (in type not smaller than nonpareil), on the following dates.

March 21, 2001

Beginning on the day of 19 ,
to the day of 19 inclusive.

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated MARCH 21, 2001

Cathy Aguilera

FPROOFAD

Story #93990 System FRSCZ by JALONZO Time 10:48:51 Date 3/26/01

Account: 2306000SAN Class: 894 Last user: JALONZO

Ad Start: 3/27/01 Ad Stop: 3/27/01 Total Cost: $147.00 Run Days: Page 1

PUBLIC NOTICE

#93990

NOTICE OF FINAL ACTION FOR THE ISSUANCE OF AUTHORITY TO CONSTRUCT PERMITS

NOTICE IS HEREHY GIVEN that the Air Pollution Control Officer has issued Authority to Construct permits to Kroll Foods, Inc. for two 2487.9 HP diesel fired IC engines driving 1750 kW electrical generators, at 2494 South Orange Drive in Fresno, CA.

No comments were received following the District's preliminary decision on this project.

The application review for Project #C 1010119 is available for public inspection at the **SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.**

(PUB: Mar 27, 2001)

BC

TO: SAMIR SHEIKH

From The Fresno Bee
Legal Notices Desk
Ph. (559) 441-6115
Fax (559) 495-6825

-Please Proofread-
This notice will
run as-is unless
otherwise instructed

Story #119498 System: FRSCZ by: LHARROD Time 9:19:18 Date 3/20/01

Account: 2806000SAN Class: 894 Last user: LHARROD
Ad Start: 3/21/01 Ad Stop: 3/21/01 Total Cost: $176.40 Run Days: Page 1

PUBLIC NOTICE

#119498

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 Anderson Clayton Corp./Oil Mill for emission reduction generated by the shutdown of equipment at the Chowchilla Oil Mill (Facility ID C-41) represented by Permit Unit Requirements (PURs) C-41-5-0, C-41-6-1, 0-41-7-0, C-41-8-1, C-41-9-1, C-41-12 1, C 41 15 0, C 41-16-0, and C-41-19 2, at 25184 Road 16 in Chowchilla, CA. The quantity of ERCs to be issued is 327,870 lb-VOC/yr, 3,047 lb- NO_x/yr, 7,792 lb-CO/yr, 79,078 lb-PM10/yr, and 49 lb SO_x/yr.

No comments were received following the District's preliminary decision on this project.

The application review for Project #C-1010009 is available for public inspection at the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.

(Pub: March 21, 2001)

BC

TO: SAMIR SHEIKH

From The Fresno Bee
Legal Notices Desk
Ph. (559) 441-6115
Fax (559) 495-6825

-Please Proofread-
This notice will run as-is unless otherwise instructed

Story #188161 System FRSCZ by JALONZO Time 10:52:53 Date 1/26/01

Account: 2306000SAN Class: 894 Last user: JALONZO
Ad Start: 1/30/01 Ad Stop: 1/30/01 Total Cost: $193.20 Run Days: Page 1

PUBLIC NOTICE

#188161

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 (ERCs) to Anderson Clayton Corp./Oil Mill for emission reductions generated by the shutdown of equipment at the Chowchilla Oil Mill (Facility ID C-41) represented by Permit Unit Requirements (PURs) C 41 5 0, C-41-6-1, C-41-7-0, C-41-8-1, C 41 9 1, C-41-12-1, C-41-15-0, C-41-16-0, and C 41 19 2, at 25184 Road 16 in Chowchilla, CA. The quantity of ERCs proposed for banking is 327,870 lb-VOC/yr, 3,047 lb NOx/yr, 2,792 lb-CO/yr, 79,078 lb-PM10/yr, and 49 lb-SOx/yr

The analysis of the regulatory basis for these proposed actions, Project #c-1010009, 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, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.**

(Pub: Jan. 30, 2001)

BC

TO: MADELEINE M. ARMI

From The Fresno Bee
Legal Notices Desk
Ph. (559) 441-6115
Fax (559) 495-6825

-Please Proofread-
This notice will run as-is unless otherwise instructed

S.S.

RECEIVED

FEB 0 1 2001

ADMIN. SERVICES
SJVUAPCD

SAN JOAQUIN VALLEY APCD

ATTN FINANCE DEPARTMENT

1990 E GETTYSBURG

FRESNO , CA 93726

PROOF OF PUBLICATION

COUNTY OF FRESNO
STATE OF CALIFORNIA

EXHIBIT A.

PUBLIC NOTICE

#188161

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 (ERCs) to Anderson Clayton Corp./Oil Mill for emission reductions generated by the shutdown of equipment at the Chowchilla Oil Mill (Facility ID C-41), represented by Permit Unit Requirements (PURs) C-41-5-0, C-41-6-1, C-41-7-0, C-41-8-1, C-41-9-1, C-41-12-1, C-41-15-0, C-41-16-0, and C-41-19-2, at 25184 Road 16 in Chowchilla, CA. The quantity of ERCs proposed for banking is 327,870 lb-VOC/yr, 3,047 lb-NOx/yr, 2,792 lb-CO/yr, 79,078 lb-PM10/yr, and 49 lb-SOx/yr.

The analysis of the regulatory basis for these proposed actions, Project #c-1010009, 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, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.**

(Pub: Jan. 30, 2001)

The undersigned states:

McClatchy Newspapers in and on all dates herein stated was a corporation, and the owner and publisher of The Fresno Bee.

The Fresno Bee is a daily newspaper of general circulation now published, and on all-the-dates herein stated was published in the City of Fresno, County of Fresno, and has been adjudged a newspaper of general circulation by the Superior Court of the County of Fresno, State of California, under the date of November 22, 1994, Action No. 520058-9.

The undersigned is and on all dates herein mentioned was a citizen of the United States, over the age of twenty-one years, and is the principal clerk of the printer and publisher of said newspaper; and that the notice, a copy of which is hereto annexed, marked Exhibit A, hereby made a part hereof, was published in The Fresno Bee in each issue thereof (in type not smaller than nonpareil), on the following dates.

Jan. 30, 2001

Beginning on the day of 19 ,
to the day of 19 inclusive.

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated JANUARY 30, 2001

Cathy Aguilera

FPROOFAD

RECEIVED

MAR 1 4 2001

ADMIN. SERVICES
SJVUAPCD

SAN JOAQUIN VALLEY APCD

ATTN FINANCE DEPARTMENT

1990 E GETTYSBURG

FRESNO , CA 93726

PROOF OF PUBLICATION

Samir

COUNTY OF FRESNO
STATE OF CALIFORNIA

EXHIBIT A.

PUBLIC NOTICE

#32608

NOTICE OF FINAL ACTION FOR THE ISSUANCE OF AUTHORITY TO CONSTRUCT PERMITS

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Authority to Construct permits to 360 Networks (USA) Inc. for a 2220 HP diesel-fired IC engine driving a 1500 kW electric generator, at 7620 N. Del Mar in Fresno, CA.

No comments were recieved following the District's preliminary decision on this project.

The application review for Project #C-1001634 is available for public inspection at the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.

(Pub: March 13, 2001)

The undersigned states:

McClatchy Newspapers in and on all dates herein stated was a corporation, and the owner and publisher of The Fresno Bee.

The Fresno Bee is a daily newspaper of general circulation now published, and on all-the-dates herein stated was published in the City of Fresno, County of Fresno, and has been adjudged a newspaper of general circulation by the Superior Court of the County of Fresno, State of California, under the date of November 22, 1994, Action No. 520058-9.

The undersigned is and on all dates herein mentioned was a citizen of the United States, over the age of twenty-one years, and is the principal clerk of the printer and publisher of said newspaper; and that the notice, a copy of which is hereto annexed, marked Exhibit A, hereby made a part hereof, was published in The Fresno Bee in each issue thereof (in type not smaller than nonpareil), on the following dates.

March 13, 2001

Beginning on the day of 19 ,
to the day of 19 inclusive.

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated MARCH 13, 2001

Cathy Aguilera

FAD

Fresno Bee

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 Anderson Clayton Corp./Oil Mill for emission reduction generated by the shutdown of equipment at the Chowchilla Oil Mill (Facility ID C-41) represented by Permit Unit Requirements (PURs) C-41-5-0, C-41-6-1, C-41-7-0, C-41-8-1, C-41-9-1, C-41-12-1, C-41-15-0, C-41-16-0, and C-41-19-2, at 25184 Road 16 in Chowchilla, CA.. The quantity of ERCs to be issued is 327,870 lb-VOC/yr, 3,047 lb-NOx/yr, 2,792 lb-CO/yr, 79,078 lb-PM10/yr, and 49 lb-SOx/yr.

No comments were received following the District's preliminary decision on this project.

The application review for Project #C-1010009 is available for public inspection at the **SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.**

55

San Joaquin Valley
Air Pollution Control District

March 15, 2001

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: C-1010009

Dear Mr. Tollstrup:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Anderson Clayton Corp./Oil Mill for emission reduction generated by the shutdown of equipment at the Chowchilla Oil Mill (Facility ID C-41) represented by Permit Unit Requirements (PURs) C-41-5-0, C-41-6-1, C-41-7-0, C-41-8-1, C-41-9-1, C-41-12-1, C-41-15-0, C-41-16-0, and C-41-19-2, at 25184 Road 16 in Chowchilla, CA.. The quantity of ERCs to be issued is 327,870 lb-VOC/yr, 3,047 lb-NOx/yr, 2,792 lb-CO/yr, 79,078 lb-PM10/yr, and 49 lb-SOx/yr.

Enclosed are copies of the ERC Certificates 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 Certificates was published on January 30, 2001. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on January 25, 2001. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. David Warner at (559) 230-5900.

Sincerely,

Seyed Sadredin
Director of Permit Services

SS:sqs
Enclosures
c: David Warner, 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 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

March 15, 2001

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 Final Action - Emission Reduction Credits
Project Number: C-1010009

Dear Mr. Rios:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Anderson Clayton Corp./Oil Mill for emission reduction generated by the shutdown of equipment at the Chowchilla Oil Mill (Facility ID C-41) represented by Permit Unit Requirements (PURs) C-41-5-0, C-41-6-1, C-41-7-0, C-41-8-1, C-41-9-1, C-41-12-1, C-41-15-0, C-41-16-0, and C-41-19-2, at 25184 Road 16 in Chowchilla, CA.. The quantity of ERCs to be issued is 327,870 lb-VOC/yr, 3,047 lb-NOx/yr, 2,792 lb-CO/yr, 79,078 lb-PM10/yr, and 49 lb-SOx/yr.

Enclosed are copies of the ERC Certificates 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 Certificates was published on January 30, 2001. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on January 25, 2001. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. David Warner at (559) 230-5900.

Sincerely,

Seyed Sadredin
Director of Permit Services

SS:sqs
Enclosures
c: David Warner, 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 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

March 15, 2001

Duncan McCook
Anderson Clayton Corp./Oil Mill
P.O. Box 12506
Fresno, CA 93778-2506

RE: Notice of Final Action - Emission Reduction Credits
Project Number: C-1010009

Dear Mr. McCook:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Anderson Clayton Corp./Oil Mill for emission reduction generated by the shutdown of equipment at the Chowchilla Oil Mill (Facility ID C-41) represented by Permit Unit Requirements (PURs) C-41-5-0, C-41-6-1, C-41-7-0, C-41-8-1, C-41-9-1, C-41-12-1, C-41-15-0, C-41-16-0, and C-41-19-2, at 25184 Road 16 in Chowchilla, CA.. The quantity of ERCs to be issued is 327,870 lb-VOC/yr, 3,047 lb-NOx/yr, 2,792 lb-CO/yr, 79,078 lb-PM10/yr, and 49 lb-SOx/yr.

Enclosed are copies of the ERC Certificates 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 Certificates was published on January 30, 2001. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on January 25, 2001. No comments were received following the District's preliminary decision on this project.

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.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. David Warner at (559) 230-5900.

Sincerely,

Seyed Sadredin
Director of Permit Services

SS:sqs
Enclosures
c: David Warner, 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 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 FEES

BILLING DATE: March 15, 2001

FACILITY I.D. #C-41
PROJECT #C-1010009

DISTRICT TAXPAYER ID #770262563

Anderson Clayton Corp./Oil Mill
P.O. Box 12506
Fresno, CA 93778-2506

BILLING FOR: ENGINEERING TIME (OVERTIME)

The following fees are due to your request for extended hours processing based on the hours expended and the average weighted overtime labor rate:

TOTAL FEES	$ 1128.40
BALANCE DUE	**$ 1128.40**

THE ABOVE TOTAL IS BASED ON THE FOLLOWING ITEMIZED LISTING:

UNIT	FEE	DESCRIPTION
ENGINEERING TIME (14 HRS X $80.60/HR)	$1128.40	AFTER-HOURS ENGINEERING EVALUATION, ATC

PLEASE **RETURN A COPY OF THIS BILL**, WITH THE AMOUNT DUE, WITHIN 30 DAYS TO:

SAN JOAQUIN VALLEY APCD
1990 EAST GETTYSBURG AVENUE
FRESNO, CA 93726-0244
ATTENTION: Samir Sheikh

cc: Finance

SAN JOAQUIN VALLEY{PRIVATE }
AIR POLLUTION CONTROL DISTRICT

OFFICE MEMO

DATE: **March 8, 2001**

TO: **File**

FROM: **Samir Sheikh, Air Quality Engineer**

SUBJECT: **Billing for Project #1010009**

A total of 8.3 hours were worked as public notice hours during regular working days. A total of 14 hours of Reimbursable Overtime were worked and the facility will be charged for these hours and the application filing fee. The $650 filing fee paid will cover the cost of engineering hours during the regular work week.

The facility will be billed as follows:

UNIT	FEE	DESCRIPTION
ENGINEERING TIME (14 HRS X $80.60/HR)	$1128.40	AFTER-HOURS ENGINEERING EVALUATION, ATC
Total	**$1128.40**	

San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 East Gettysburg • Fresno, CA 93726

Emission Reduction Credit Certificate
C-398-1

ISSUED TO: Anderson Clayton Corporation

ISSUED DATE: March 15, 2001

LOCATION OF REDUCTION: 25184 Road 16
Chowchilla, CA

For VOC Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
112,929	104,976	40,935	69,030

[ ] Conditions Attached

Method Of Reduction
[ ] Shutdown of Entire Stationary Source
[x] Shutdown of Emissions Units
[ ] Other:

David L. Crow, APCO

Seyed Sadredin
Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 East Gettysburg * Fresno, CA 93726

Emission Reduction Credit Certificate
C-398-2

ISSUED TO: Anderson Clayton Corporation

ISSUED DATE: March 15, 2001

LOCATION OF REDUCTION: 25184 Road 16
Chowchilla, CA

For NOx Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
968	811	338	930

[ ] Conditions Attached

Method Of Reduction
[x] Shutdown of Entire Stationary Source
[ ] Shutdown of Emissions Units
[ ] Other:

David L. Crow, APCO

Seyed Sadredin
Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 East Gettysburg * Fresno, CA 93726

Emission Reduction Credit Certificate
C-398-3

ISSUED TO: Anderson Clayton Corporation

ISSUED DATE: March 15, 2001

LOCATION OF REDUCTION: 25184 Road 16
Chowchilla, CA

For CO Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
887	743	310	852

[ ] Conditions Attached

Method Of Reduction
[x] Shutdown of Entire Stationary Source
[ ] Shutdown of Emissions Units
[ ] Other:

David L. Crow, APCO

Seyed Sadredin
Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Central Regional Office * 1990 East Gettysburg * Fresno, CA 93726

Emission Reduction Credit Certificate
C-398-4

ISSUED TO: Anderson Clayton Corporation

ISSUED DATE: March 15, 2001

LOCATION OF REDUCTION: 25184 Road 16
Chowchilla, CA

For PM_{10} Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
27,222	25,285	9,864	16,707

[ ] Conditions Attached

BC

Method Of Reduction
[x] Shutdown of Entire Stationary Source
[ ] Shutdown of Emissions Units
[ ] Other:

David L. Crow, APCO

Seyed Sadredin
Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 East Gettysburg * Fresno, CA 93726

Emission Reduction Credit Certificate
C-398-5

ISSUED TO: Anderson Clayton Corporation

ISSUED DATE: March 15, 2001

LOCATION OF REDUCTION: 25184 Road 16
Chowchilla, CA

For SOx Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
16	13	5	15

[ ] Conditions Attached

Method Of Reduction
[x] Shutdown of Entire Stationary Source
[ ] Shutdown of Emissions Units
[ ] Other:

David L. Crow, APCO

Seyed Sadredin
Director of Permit Services

PARSONS ENGINEERING SCIENCE

A UNIT OF PARSONS INFRASTRUCTURE & TECHNOLOGY GROUP INC

ANDERSON CLAYTON CORP.

CAPP ERC APPLICATION

Facility: *CHOWCHILLA OIL MILL (#C-41)*
25184 Road 16
Chowchilla, CA 93610

Agency: *SJVUAPCD*
CENTRAL REGION
1990 E. Gettysburg Avenue
Fresno, CA 93726

Prepared by: *PARSONS ENGINEERING SCIENCE, INC.*
2520 PEGASUS DRIVE
BAKERSFIELD, CA 93308

Date: *January 3, 2000*

2520 Pegasus Drive • Bakersfield, CA 93308 • (661) 393-0272 • Fax: (661) 393-8306

San Joaquin Valley
Unified Air Pollution Control District

PERMIT APPLICATION SUBMITTED BY

CERTIFIED AIR PERMITTING PROFESSIONAL

STAMP HERE

This application package is submitted by a Certified Air Permitting Professional. Included in this package is a complete application for Authority to Construct/Permit to Operate, a hard copy of the Application Review in the format prescribed by the District and a copy of the Application Review in either Microsoft Word or WordPerfect format on a 3 1/2 floppy.

Signature Kevin Madry Date 1-3-01

CAPP ERC APPLICATION SUBMITTAL

FOR

ANDERSON CLAYTON CORPORATION (FACILITY #C-41)

Facility:	Chowchilla Oil Mill
Mailing Address:	P.O. Box 12506 Fresno, CA 93778-2506
Contact:	Duncan McCook
Telephone:	(559) 446-6415
Fax:	(559) 447-4425
E-Mail:	DuncanM@AndersonClayton.com
CAPP Engineer:	Kevin Madry
Telephone:	(661) 393-0272
Fax:	(661) 393-8306
E-Mail:	Kevin_Madry@Parsons.com
Other Contact:	John Gruber, P.E.
Telephone:	(661) 393-0272
Fax:	(661) 393-8306
E-Mail:	John.Gruber@Parsons.com
Affected Permits:	C-41-5, -6-1, -7-0, -8-1, -9-1, -12-1, -15-0, -16-0, and –19-2
Submitted:	January 3, 2000

1/25/01 CALLED & LET HIM KNOW PROJECT WAS SENT OUT FOR NOTICING.

ANDERSON CLAYTON CORPORATION
CAPP Application

Table of Contents for Attached ERC Application Review

Supplemental Documentation

ERC APPLICATION REVIEW
Project #:

Facility Name: Anderson Clayton Corporation
Mailing Address: P.O. Box 12506
Fresno, CA 93778-2506

Contact Name: Duncan McCook, Manager – Technical Services
Telephone: (559) 446-6415
Fax: (559) 447-4425

Engineer:
Date:

Reviewed By:
Date:

Certificate #(s): C-XXXX-1, C-XXXX-2, C-XXXX-3, C-XXXX-4, C-XXXX-5
Submitted: January 3, 2000
Deemed Complete:

I. SUMMARY:

Anderson Clayton Corp. requests emission reduction credit (ERC) banking certificates for emission reductions generated by the shutdown of equipment at the Chowchilla Oil Mill (Facility ID C-41) represented by Permits to Operate (PTO) C-41-5-0, C-41-6-1, C-41-7-0, C-41-8-1, C-41-9-1, C-41-12-1, C-41-15-0, C-41-16-0, and C-41-19-2. Copies of the cancelled PTO's for the shutdown equipment are presented in Attachment A. The facility will continue to operate exclusively as a cotton seed receiving and storage facility. Copies of PTO's for the remaining operations at the facility are presented in Attachment I.

The following emission reductions have been found to qualify for ERC banking certificates C-XXX-1, C-XXXX-2, C-XXXX-3, C-XXXX-4, and C-XXXX-5:

	VOC (pounds)	NOx (pounds)	CO (pounds)	PM10 (pounds)	SOx (pounds)
ERC No.	**C-XXXX-1**	**C-XXXX-2**	**C-XXXX-3**	**C-XXXX-4**	**C-XXXX-5**
1st Quarter	**113,852**	**2,689**	**887**	**29,508**	**16**
2nd Quarter	**105,834**	**2,254**	**743**	**27,355**	**13**
3rd Quarter	**41,269**	**940**	**310**	**10,682**	**5**
4th Quarter	**69,593**	**2,584**	**852**	**18,113**	**15**

II. APPLICABLE RULES:

Rule 2201: New and Modified Stationary Source Review Rule (June 15, 1995)

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

III. PROJECT LOCATION:

The facility is located at 25184 Road 16, Chowchilla, CA. The facility is located within 1000 feet of a K-12 schools.

IV. METHOD OF GENERATING REDUCTIONS:

The Actual Emissions Reductions (AER) have been generated by the voluntary shutdown of equipment at the Chowchilla Oil Mill. Anderson Clayton Corp. has forfeited the Permits to Operate (PTO) for the following equipment in order to validate the emission reduction credits:

C-41-5-0: 300 Hp First Cut Delinting Operation Including 14 Linters with Associated Conveyors Served by 4 – 42" 2D-2D Cyclones, 1-30", 1-36", and 1-18" 1D-3D Cyclone.

C-41-6-1: 183 Hp Seed Cleaning Operation Including 6 Seed Cleaners, with Associated Conveyors, Served by 12 – 28", 2 – 36", and 1- 32" 2D-2D Cyclones; A Lint Collection System Including a 30 Hp Fan, A Feeder, And a Baler Served by One 46" 1D-3D Cyclone.

C-41-7-0: 888.5 Hp Second Cut Delinting Operation Including 40 Linters with Associated Conveyors Served by a Total of 17 Cyclones – 4 – 48", 4 – 54", 3 – 32", and 1 – 34" 2D-2D Cyclones; 3 – 28" and 1 – 18" 1D-3D Cyclones; and 1 Kice Cyclone.

C-41-8-1: 216 Hp Dehulling Operation Including Three Decorticators, 3 Hull Beaters, and a Tailings Beater Served by Three 44" and Three 34" 1D-3D Cyclones.

C-41-9-1: 400 Hp Hexane Recovery and Oil Extraction Unit Including a Mineral Oil Packed Tower Scrubber.

C-41-12-1: 32.0 MMBtu/hr Murray Natural Gas-Fired Boiler, with Diesel Oil Standby Capacity.

C-41-15-0: (4) 125 Ton Meal Tanks with Hoppers Served by One 20" 1D-3D Cyclone, 1 Saunco Pulsejet Model SFSB6-16-159 Baghouse with 14 Bags, 2 Rotolifts, 2 Reclaim Conveyors, 1 Bucket Elevator, 1 Tank Distribution Conveyor, and 1 Collection Conveyor. Rating: 96 Hp.

C-41-16-0: 71 Hp Truck Loadout of Meal Including (1) 20 Hp Incline Conveyor, (1) 15 Hp Distribution Conveyor, and (1) 3 Hp Baghouse Conveyor. The Exhaust System Consists of Fan with 40 Hp Motor and (1) 3 Hp Micro PULSEAIR 1F1 Baghouse with 80 Bags.

C-41-19-2: 903 Hp Cotton Seed Preparation Room: Consisting of a Flaking Mill Served by One 22" 1D-3D Cyclone, A Steam Cooker, Two Expanders, and a Collet Cooler/Dryer Served by One 60" 1D-3D Cyclone.

As required by Rules 2201 & 2301, creditable emission reductions are to be based upon historical actual emissions (HAE) quantified using process/throughput rates for the facility over the appropriate baseline period, and the use of acceptable emission factors including source test derived emission factors. The following table briefly describes the source and type of pollutants for each process including the method(s) for quantifying historical actual emissions (HAE):

Permit Unit	Pollutant(s)	Emissions Source(s)	Method of Quantifying HAE
C-41-5-0	PM-10	1D-3D and 2D-2D cyclones	Actual Seed Process Rate and District Approved Emission Factors
C-41-6-1	PM-10	1D-3D and 2D-2D cyclones	Actual Seed Process Rate and District Approved Emission Factors
C-41-7-0	PM-10	1D-3D and 2D-2D cyclones	Actual Seed Process Rate and District Approved Emission Factors
C-41-8-0	PM-10	1D-3D cyclones	Actual Seed Process Rate and District Approved Emission Factors
C-41-9-1	VOC (as Hexane)	Mineral oil scrubber used to reclaim solvent (hexane)	Actual Seed Process Rate and District Approved Emission Factor
C-41-12-1	NOx, VOC, PM10, SOx, and CO	Combustion of natural gas in 32.0 MMBtu/hr boiler	Actual Fuel Usage and Permitted Emission Factors
C-41-15-0	PM10	1D-3D cyclone and baghouse exhaust	Actual Meal Production Rate and District Approved Emission Factors
C-41-16-0	PM10	Baghouse exhaust	Actual Meal Production Rate and District Approved Emission Factors
C-41-19-2	PM10	1D-3D cyclones	Actual Seed Process Rate and District Approved Emission Factors

V. CALCULATIONS:

A. Assumptions

Calculation of HAE and the corresponding Actual Emission Reductions (AERs) is dependent on both the actual production data submitted by an applicant, and appropriate emission factors. The assumptions used to quantify the HAE for the affected permit units are described below:

- Emissions from the first cut delinting operation (permit C-41-5-0) and second cut delinting operation (permit C-41-7-0) will be calculated based on actual historical seed processing rates, the number of emissions points (cyclones), and emission factors used to calculate the potentials to emit for the permit units in project 930468. These emission factors are based on source test results for similar cottonseed oil mills in Fresno County (see Attachment E). Actual source test data and records of measured airflow rates do not exist for the cyclones serving these operations.

- Emissions from the seed cleaning operation (permit C-41-6-1) and dehulling operation (permit C-41-8-1) will be calculated based on actual historical seed processing rates, the number of emissions points (cyclones), and AP-42 based emission factors used to calculate the current daily emissions limitations (DELs) for the permit units. These emission factors are based on source test results for similar cottonseed oil mills in Fresno County (see Attachment E). Actual source test data and records of measured airflow rates do not exist for the cyclones serving these operations.

- As discussed in project #940442, VOC emissions from the hexane recovery and oil extraction unit, permit C-41-9-1, is dependent on the quantity of seed processed and not on the quantity of oil produced. All hexane losses from the solvent extraction unit are VOC emitted to the atmosphere, and the VOC retained in the meal are eventually emitted to the atmosphere. Therefore, the 3.7 lb-VOC/ton (seed processed) emission factor used to calculate the current DEL will be used to quantify the HAE for the operation.

- Emissions from the 32.0 MMBtu/hr natural gas-fired boiler, permit C-41-12-1, equipped with standard burners will be based on actual fuel use records and either permitted emission factors or the latest emission factors provided in AP-42, Tables 1.4-1 and 1.4-2, whichever is lower. The HAE for CO and VOC will be quantified using current permitted emission factors, whereas, the HAE for NOx, PM10, and SOx will be quantified using emission factors from AP-42. Source test results do not exist for this unit.

- Emissions from the cotton seed preparation room, permit C-41-19-2, will be quantified by developing lb-PM10/ton emission factors based on the 600 tons/day process limit and grain loading concentrations and air flow rates for the two cyclones serving the operation. In project 970202, a 1.23 lb-PM10/day potential to emit was calculated for the flaking mill cyclone based on a grain loading limit of 0.02 grains-TSP/dscf, air flow of 600 cfm, and a PM10/TSP ratio of 0.50. This limit is equivalent to a PM10 emission factor of ***0.0021 lbs*** per ton of seed processed (@ 600 tons/day). The 9.8 lb-PM10/day potential to emit quantified for the collet cooler/dryer cyclone in project 980489 was based on a grain loading limit of 0.0095 grains/dscf, air flow of 10,000 cfm, and PM10/TSP ratio of 0.50. Compliance with the grain loading limit was demonstrated by source testing performed on April 29, 1998. Therefore, the 0.0095 grains/dscf limit correlates to a PM10 emission factor of ***0.0163 lb*** per ton of seed processed.

- Emissions from the meal storage and handling operation, permit C-41-15-0, will be determined based on actual meal production rates, AP-42 based emission factors used to calculate the current DEL, and a 97% control efficiency for the Saunco Pulsejet baghouse. Source test results do not exist for the unit. In project 930002, the baghouse was assumed capable of achieving a control efficiency of 95%. However, the air to cloth ratio calculated in that project was determined to be within the acceptable range. Therefore, a higher 97% control efficiency will be used to calculate the HAE based on the assumption the baghouse was reasonably maintained and operated.

- Emissions from the meal truck loadout operation, permit C-41-16-0, will be determined based on actual meal throughput, the AP-42 based emission factor used to calculate the current DEL, and a 95% control efficiency for the Micro PulseAir baghouse. Source test results do not exist for the unit. In project 930002, the baghouse was assumed to be capable of achieving a control efficiency of 95% since the air to cloth ratio calculated in that project was not within the acceptable range for the material being handled. Therefore, the 95% control efficiency will be used to calculate the HAE since the baghouse air flow exceeds the optimum range (AP-40, Tables 38 and 41) necessary to achieve higher control efficiencies.

B. Emission Factors

PM-10 Emission Factors for Seed/Meal Processing and Handling

Permit Unit	Description	TSP EF (lb/ton per emissions pt)	PM-10 EF (lb/ton per emissions pt)	Reference
C-41-5-0	1st Cut Lint Cleaning	0.08	0.04	TSP source test inform presented in Fresno C APCD document (Attachi
C-41-6-1	Seed Cleaning	0.012	0.006	TSP source test inform presented in Fresno Cc APCD document (Attachn
C-41-7-0	2nd Cut Lint Cleaning	0.022	0.011	TSP source test informa presented in Fresno Cot APCD document (Attachm
C-41-8-1	Hulling & Separation	0.098	0.049	TSP source test information presented in Fresno County APCD document (Attachment E)
C-41-15-1	Meal Storage and Handling	Receiving: 2.5	1.25	Project 930002 and AP-42, Table 6.4-6
		Handling: 5.5	2.75	Project 930002 and AP-42, Table 6.4-6

PM-10 Emission Factors for Seed/Meal Processing and Handling

Permit Unit	Description	TSP EF (lb/ton per emissions pt)	PM-10 EF (lb/ton per emissions pt)	Reference
C-41-16-0	Meal Truck Loadout	Loading: 1.0	0.50	Project 930002 and AP-42, Table 6.4-6 Project 930002
C-41-19-2	Seed Preparation Room	Flaking Mill Cyclone	0.0021	Based on permitted production rate limit, and grain loading and air flow limits used to calculate the PE in project 970202
		Collet Cooler/Dryer Cyclone	0.0163	Based on permitted production rate, grain loading limit on PTO, and air flow from 4/29/98 source test report.

VOC Emissions from Hexane

Permit Unit	Description	VOC Emission Factor (lb/ton of seed)	Reference
C-41-9-1	Hexane Recovery and Oil Extraction Operation	3.7	Project 940442

Combustion Emissions

Permit Unit	Description	Pollutant	Emission Factor (lb/MMBtu)	Reference
C-41-12-1	32.0 MMBtu/hr gas-fired boiler	NOx	0.133	Current PTO – 950657
		VOC	0.0022	Current PTO – 950657
		PM10	0.013	Current PTO – 950657
		SOx (as SO2)	0.0006	AP-42, Table 1.4-2
		CO	0.033	Current PTO – 950657

C. Baseline Period Determination and Data

Per Section 3.7.1 of Rule 2201, baseline period is defined as: a) two consecutive years of operation immediately prior to submission of the complete application; or b) another time period of at least two consecutive years within the five years immediately prior to submission of the complete application as determined by the APCO as more representative of normal operation.

Although the seed processing equipment at the Chowchilla Oil Mill is in place and operable, the facility has not processed cotton seed since 1998 (The facility is currently utilized for the temporary receipt and storage of cotton seed). Production at the facility also fluctuated season to season; therefore, the representative production period is the two consecutive years within the previous five-year period (1995 to 2000) that is more representative of normal operation. Also, periods of non-operation are not included in the calculation of baseline production and emission rates since the District does not consider such periods representative of normal operation.

Since the term "normal operation" is not specifically defined by District rule or policy, Anderson Clayton proposes to use actual quarterly production data for the period from 1992 to 1998 to establish normal operation for the Chowchilla Oil Mill. Annual production data exists for prior years (see Attachment B), however, quarterly production data is not available for the facility prior to 1992. The baseline period chosen will be two consecutive year period within the last five years that most closely matches the average production rates quantified for the 1992 to 1998 period of operation. Annual production information supplied by the applicant is as follows:

Production Year	Seed Processed (tons/year)	Hexane Usage (gallons/year)	Meal Produced (tons/year)	Natural Gas Usage (Therms/year)
1992	119,784	62,002	61,796	1,022,070
1993	130,779	84,875	69,761	1,026,900
1994	130,413	?	67,363	1,201,200
1995	100,363	105,496	50,468	938,173
1996	123,888	111,992	65,885	1,114,967
1997	74,527	154,594	39,140	766,508
1998	57,137	102,007	29,948	407,158
1999	0	0	0	0
2000	0	0	0	0
Averages	105,270*	103,494**	54,909*	925,282*

*The average production and natural gas use rates are based on 7 years of operation and do not include years 1999 and 2000 since non-operation is not representative of normal operation.

** Average annual hexane usage is based on 6 years as data could not be located for 1994. Data for 1999 and 2000 is not included since process equipment did not operate during these years.

The two consecutive year period that most closely approximates the average 105,270 tons of seed is the 1996 and 1997 operating period with an average production of 99,208 tons of seed per year. Therefore, the 1996 and 1997 production years represent the two consecutive year period during the previous five years to be the most representative of normal operation. The quarterly breakdown of production data for these years is presented below and in Attachment B.

Baseline Production Averages

	Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Seeds Processed (tons)	1996	32,500	34,547	24,773	32,068
	1997	35,844	28,987	0	9,696
Averages =		***34,172***	***31,767***	***12,387***	***20,882***
Hexane (gallons)	1996	21,161	30,525	29,511	30,795
	1997	17,230	73,895	0	63,469
Averages =		***19,196***	***52,210***	***14,756***	***47,132***
Meal Produced (tons)	1996	17,212	18,223	13,068	17,382
	1997	19,266	14,808	0	5,066
Averages =		***18,239***	***16,516***	***6,534***	***11,224***
Natural Gas (Therms)	1996	266,496	297,789	208,968	341,714
	1997	331,105	203,009	0	232,394
Averages =		***298,801***	***250,399***	***104,484***	***287,054***

D. Historical Actual Emissions

1. Seed/Meats Processing Emissions (PM_{10})

The PM_{10} HAE for seed/meats processing is calculated as follows:

(quarterly average tons seed/meats processed)(PM10 emission factor) = HAE

Permit Unit C-41-5-0, 1st Cut Lint Cleaning

	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Average Quarterly Production	34,172	31,767	12,387	20,882
PM10-EF (lb/ton/pt)	0.04	0.04	0.04	0.04
# of Emission Points (cyclones)	7	7	7	7
HAE =	9,568	8,895	3,468	5,847

Permit Unit C-41-6-1, Seed Cleaning				
	1st Quarter	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
Average Quarterly Production	34,172	31,767	12,387	20,882
PM-10 EF (lb/ton/pt)	0.006	0.006	0.006	0.006
# of Emission Points (cyclones)	16	16	16	16
HAE =	3,281	3,050	1,189	2,005

Permit Unit C-41-7-0, 1st Cut Lint Cleaning				
	1st Quarter	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
Average Quarterly Production	34,172	31,767	12,387	20,882
PM-10 EF (lb/ton/pt)	0.011	0.011	0.011	0.011
# of Emission Points (cyclones)	17	17	17	17
HAE =	6,390	5,940	2,316	3,905

Permit Unit C-41-8-1, Hulling and Separation				
	1st Quarter	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
Average Quarterly Production	34,172	31,767	12,387	20,882
PM-10 EF (lb/ton/pt)	0.049	0.049	0.049	0.049
# of Emission Points (cyclones)	6	6	6	6
HAE =	10,047	9,339	3,642	6,139

Permit Unit C-41-19-2, Seed Preparation Room				
	1st Quarter	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
Average Quarterly Production	34,172	31,767	12,387	20,882
Flaking Mill Cyclone PM-10 EF (lb/ton)	0.0021	0.0021	0.0021	0.0021
Collet Cooler/Dryer Cyclone PM-10 EF (lb/ton)	0.0163	0.0163	0.0163	0.0163
HAE =	629	585	228	384

2. Meal Storage, Handling, and Loading Emissions (PM_{10})

The PM_{10} HAE for meal storage, handling, and loading is calculated as follows:

(quarterly average meal produced)(PM10 emission factor) = HAE

Permit Unit C-41-15-0, Meal Storage and Handling

	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Average Quarterly Production	18,239	16,516	6,534	11,224
Receiving PM-10 EF (lb/ton)	1.25	1.25	1.25	1.25
Handling PM-10 EF (lb/ton)	2.75	2.75	2.75	2.75
Baghouse Control Efficiency	97%	97%	97%	97%
HAE =	2,189	1,982	784	1,347

Permit Unit C-41-16-0, Meal Truck Loading

	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Average Quarterly Production	18,239	16,516	6,534	11,224
PM-10 EF (lb/ton)	0.50	0.50	0.50	0.50
Baghouse Control Efficiency	95%	95%	95%	95%
HAE =	456	413	163	281

3. Natural Gas-Fired Heater Emissions

The HAE for SO_X, NO_X, VOC, and CO from the combustion of natural gas in the 32.0 MMBtu/hr boiler, permit C-41-12-1, is calculated as follows:

(quarterly average MMBtu of natural gas used)(emission factor) = HAE

The HAE from the natural gas-fired boiler C-41-12-1 is as follows:

Permit Unit C-41-12-1, 32.0 MMBtu/hr Natural Gas-Fired Boiler					
		1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Avg. Quarterly Gas Use (Therms @ 100,000 Btu)		298,801	250,399	104,484	287,054
Pollutant	**Emission Factor**	**Historical Actual Emissions - lbs (@ 1000 Btu/scf)**			
NOx	0.10 lb/MMBtu (AP-42, Table 1.4-1)	2,988	2,504	1,045	2,871
VOC	0.0022 lb/MMBtu (Current PTO)	66	55	23	63
PM10	0.0076 lb/MMBtu (AP-42, Table 1.4-2)	227	190	79	218
CO	0.033 lb/MMBtu (Current PTO)	986	826	345	947
SOx	0.0006 lb/MMBtu (AP-42, Table 1.4-2)	18	15	6	17

4. Hexane Recovery and Oil Extraction Unit Emissions

The HAE for VOC from the use of hexane by equipment serving permit unit C-41-9-1, is calculated as follows:

(quarterly average seed processed)(VOC emission Factor) = HAE

The HAE from permit unit C-41-9-1 is as follows:

Permit Unit C-41-9-1, Hexane Recovery and Oil Extraction				
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Average Quarterly Seed Processed (tons)	34,172	31,767	12,387	20,882
VOC Emission Factor (lb/tons-seed)	3.7	3.7	3.7	3.7
HAE =	126,436	117,538	45,832	77,263

E. Actual Emissions Reductions

Pursuant to Section 3.2 of Rule 2201, AER shall be real, surplus, permanent, quantifiable & enforceable. AER is calculated per subsection 6.5, and is as follows:

AER = HAE (for shutdown of an emissions unit)

Therefore, the AER is equal to the HAE, and can be summarized for each pollutant as follows:

	VOC (pounds)	NOx (pounds)	CO (pounds)	PM10 (pounds)	SOx (pounds)
1st Quarter	126,502	2,988	986	32,787	18
2nd Quarter	117,593	2,504	826	30,394	15
3rd Quarter	45,855	1,045	345	11,869	6
4th Quarter	77,326	2,871	947	20,126	17

F. Air Quality Improvement Deduction

The Air Quality Improvement Deduction (AQID) is 10% of the AER per Rule 2201, subsection 6.5, and is summarized as follows:

	VOC (pounds)	NOx (pounds)	CO (pounds)	PM10 (pounds)	SOx (pounds)
1st Quarter	12,650	299	99	3,279	2
2nd Quarter	11,759	250	83	3,039	2
3rd Quarter	4,586	105	35	1,187	1
4th Quarter	7,733	287	95	2,013	2

G. Increase in Permitted Emissions

The ERC banking application has been submitted to bank emission reductions generated by the permanent shutdown of permitted equipment. Therefore, no increase in permitted emissions (IPE) is associated with this project.

H. Bankable Emissions Reductions Credits

The total bankable emissions reductions are summarized as follows:

	VOC (pounds)	NOx (pounds)	CO (pounds)	PM10 (pounds)	SOx (pounds)
1st Quarter	113,852	2,689	887	29,508	16
2nd Quarter	105,834	2,254	743	27,355	13
3rd Quarter	41,269	940	310	10,682	5
4th Quarter	69,593	2,584	852	18,113	15

VI. COMPLIANCE:

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

A. Real

The AERs quantified above were based on historical actual emissions and were calculated from actual production data from the stationary source. The affected processing equipment at the Chowchilla Oil Mill are now shutdown and the Permits to Operate have been surrendered; therefore, the reductions are real.

B. Enforceable

The Permits to Operate for the affected processing equipment have been surrendered; subsequently, any future seed processing and meal production cannot be performed unless an enforceable Authority to Construct is issued 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 and actual production data; therefore, the AERs are quantifiable.

D. Permanent

Anderson Clayton Corp. permanently shut-down the affected processing equipment at the Chowchilla Oil Mill, and surrendered the valid Permits to Operate to the District, effective July 17, 2000; therefore, the AERs are permanent.

E. Surplus

The shutdown of the affected processing equipment at the stationary source 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.

Anderson Clayton cannot process cotton seed and produce meal at the Chowchilla Oil Mill without first obtaining Authorities to Construct and satisfying all applicable New Source Review requirements. Therefore, the AERs are surplus.

F. Timeliness

The application for ERC was submitted to the District on January 4, 2000. 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, in which the eligibility of the ERC application for the shutdown of processing equipment is dependent upon the definition of "shutdown" per Rule 2301. Section 3.11 of Rule 2301 defines "shutdown" as the following: the earlier of the permanent cessation of emissions from an emitting unit or the surrender of operating permits. If prior to the surrender of the operating permits, the APCO determines that the units have been removed or fallen into an inoperable or unmaintained condition such that startup would required an investment exceeding 50% of the current replacement, then the date of shutdown is the date of last emissions.

Anderson Clayton canceled the Permits to Operate (PTOs) equipment shutdown at the Chowchilla Oil Mill (facility ID# C-41) effective July 17, 2000. According to Anderson Clayton, and based on inspections by the District's Compliance Division, the affected processing equipment was not removed and had not fallen into an inoperable condition at the time the PTO's were surrendered.

The date of shutdown is July 17, 2000 commensurate surrender of the Permits to Operate for the affected processing equipment. The ERC application was submitted on January 4, 2001, which is less than 180 days after the date of shutdown. Therefore, the application is timely.

VII. RECOMMENDATION:

Issue the requested ERC Banking Certificates to Anderson Clayton Corp. after completion of the required 30-day public notification period, and review of comments received, for the following amounts:

	VOC (pounds)	NOx (pounds)	CO (pounds)	PM10 (pounds)	SOx (pounds)
ERC No.	C-XXXX-1	C-XXXX-2	C-XXXX-3	C-XXXX-4	C-XXXX-5
1st Quarter	113,852	2,689	887	29,508	16
2nd Quarter	105,834	2,254	743	27,355	13
3rd Quarter	41,269	940	310	10,682	5
4th Quarter	69,593	2,584	852	18,113	15

Attachment A

Permits to Operate for Shutdown Equipment

CONDITIONS FOR PERMIT C-41-5-0

INSPECTION

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

WORKSHEET

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
300 HP FIRST CUT DELINTING OPERATION INCLUDING 14 LINTERS WITH ASSOCIATED CONVEYORS SERVED BY 4-42" 2D-2D CYCLONES, 1-30", 1 36", AND 1-18" 1D-3D CYCLONE. REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER

CONDITIONS

1. {12} Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
2. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. {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]
4. {271} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
5. {229} The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100]
6. {234} The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081]
7. Records of daily seed throughput shall be maintained, retained on the premises for at least two years and made available for District inspection upon request. [District Rule 1070]

(DELETED)

CONDITIONS FOR PERMIT C-41-6-1

INSPECTION

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

WORKSHEET

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
183 HP SEED CLEANING OPERATION INCLUDING 6 SEED CLEANERS, WITH ASSOCIATED CONVEYORS, SERVED BY 12-28", 2-36", AND 1-32" 2D-2D CYCLONES; A LINT COLLECTION SYSTEM INCLUDING A 30 HP FAN, A FEEDER, AND A BALER SERVED BY ONE 46" 1D-3D CYCLONE. REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER

CONDITIONS

1. {12} Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
2. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. {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]
4. {271} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
5. {229} The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100]
6. {234} The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081]
7. Records of daily seed throughput shall be maintained, retained on the premises for at least two years and made available for inspection upon request. [District Rule 1070]
8. Emissions of PM10 from the facility shall not exceed 45 pounds per day. [District Rule 2201]

INSPECTION WORKSHEET

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
888.5 HP SECOND CUT DELINTING OPERATION INCLUDING 40 LINTERS WITH ASSOCIATED CONVEYORS SERVED BY A TOTAL OF 17 CYCLONES - 4-48", 4-54", 3-32", AND 1-34" 2D-2D CYCLONES; 3-28" AND 1-18" 1D-3D CYCLONES; AND 1 KICE CYCLONE *REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER*

CONDITIONS

1. {12} Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
2. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. {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]
4. {271} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
5. {229} The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100]
6. {234} The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081]
7. Records of daily seed throughput shall be maintained, retained on the premises for at least two years and made available for District inspection upon request. [District Rule 1070]

INSPECTION

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

WORKSHEET

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
216 HP DEHULLING OPERATION INCLUDING THREE DECORTICATORS, 3 HULL BEATERS, AND A TAILINGS BEATER SERVED BY THREE 44" AND THREE 34" 1D-3D CYCLONES *REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER*

CONDITIONS

1. {36} All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District NSR Rule]
2. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. {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]
4. {229} The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100]
5. Records of the facility operating schedule and daily cottonseed throughput shall be maintained, retained for at least two years, and made available to the District upon request. [District Rule 1070]
6. {233} The APCO or any authorized representative, upon request, shall have access to, and copies of, any records required to be kept under the terms and conditions of this permit. [CH&SC 42303]
7. Emission of PM10 shall not exceed 112.5 pounds per day. [District Rule 2201]

CONDITIONS FOR PERMIT C-41-9-1

INSPECTION

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

WORKSHEET

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
400 HP HEXANE RECOVERY AND OIL EXTRACTION UNIT INCLUDING A MINERAL OIL PACKED TOWER SCRUBBER *REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER*

CONDITIONS

1. {227} All equipment or systems installed or used to achieve compliance with the terms and conditions of the Authority to Construct shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District NSR Rule]
2. The emissions of VOCs, calculated from hexane inventory losses, shall not exceed 2,200 lbs/day or 200,200 lbs/qtr. [District Rule 2201]
3. The quantity of seeds and nuts processed shall not exceed 500 tons in any one day. [District Rule 2201]
4. The mineral oil scrubber and vent condensers shall be in full operation whenever the extraction unit is operated. [District Rule 2201]
5. The extraction plant shall be inspected for fugitive VOC emissions monthly in accordance with EPA Method 21. [District Rule 4691]
6. Equipment found to be leaking, with emissions concentrations greater than 10,000 ppm as methane, shall be tagged immediately and repaired within ten days. [District Rule 4691]
7. An inspection log with records of the date and results of all inspections, repairs, and reinspections shall be maintained and made available to the District upon request. [District Rule 1070]
8. Daily records of the type and quantity of seeds and nuts processed and hexane inventory losses shall be maintained, retained on the premises for at least two years and made available for District inspection upon request. [District Rule 1070]
9. The facility shall comply with District Rule 4691 "Vegetable Oil Processing Operations". [District Rule 4691]

INSPECTION WORKSHEET

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
32.0 MMBTU/HR MURRAY NATURAL GAS-FIRED BOILER, WITH DIESEL OIL STANDBY CAPACITY *REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER*

CONDITIONS

1. {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]
2. {271} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
3. {234} The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081]
4. This unit shall be fired on PUC grade natural gas except during natural gas curtailment. This exception is limited to 336 cumulative hours per calendar year excluding equipment testing, which is not to exceed 48 hours per calendar year. [District Rule 4305]
5. Daily emissions shall not exceed 0.133 lb-NOx/MMBtu, 0.033 lb-CO/MMBtu, 0.013-lb PM10/MMBtu, nor 0.0022 lb-VOC/MMBtu when fired by natural gas. [District Rule 2201]
6. Daily emissions shall not exceed 0.152 lb-NOx/MMBtu, 0.038 lb-CO/MMBtu, 0.055 lb-SOx/MMBtu, 0.015 lb-PM10/MMBtu, nor 0.0003 lb-VOC/MMBtu when fired by distillate oil. [District Rule 2201]
7. Records of daily fuel (natural gas and oil) usage and operating hours shall be maintained and retained on the premises for at least two years and made available for District inspection upon request. [District Rule 1070]
8. Boiler shall comply with applicable requirements of District Rule 4305. [District Rule 4305]

CONDITIONS FOR PERMIT C-41-15-0

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
(4) 125 TON MEAL TANKS WITH HOPPERS SERVED BY ONE 20" 1D-3D CYCLONE, 1 SAUNCO PULSEJET MODEL SFSB6-16-159 BAGHOUSE WITH 14 BAGS, 2 ROTOLIFTS, 2 RECLAIM CONVEYORS, 1 BUCKET ELEVATOR, 1 TANK DISTRIBUTION CONVEYOR, AND 1 COLLECTION CONVEYOR. RATING:96HP *REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER*

CONDITIONS

1. {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]
2. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. {10} The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule]
4. {11} Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule]
5. Particulate matter emissions at the baghouse exhaust shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
6. Only one meal tank shall be loaded at any one time. [District Rule 2201]
7. All covers shall remain in place during operation of equipment. [District Rule 2201]
8. Daily emissions of PM10 shall not exceed 55 pounds per day. [District Rule 2201]
9. Pressure drop across filters shall be maintained between 2" and 6" W.C. [District Rule 2201]

CONDITIONS FOR PERMIT C-41-16-0

INSPECTION

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

WORKSHEET

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
71 HP TRUCK LOADOUT OF MEAL INCLUDING (1) 20 HP INCLINE CONVEYOR, (1) 15 HP DISTRIBUTION CONVEYOR, AND (1) 3 HP BAGHOUSE CONVEYOR. THE EXHAUST SYSTEM CONSISTS OF FAN WITH 40 HP MOTOR AND (1) 3 HP MICRO PULSEAIR 1F1 BAGHOUSE WITH 80 BAGS.*REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER*

CONDITIONS

1. {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]
2. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. {10} The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule]
4. {11} Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule]
5. {265} All records shall be retained for a minimum of 2 years, and shall be made available for District inspection upon request. [District Rule 1070]
6. Particulate matter emissions at the baghouse exhaust shall not exceed 0.1 grains/dscf. [District Rule 4201]
7. All covers shall remain in place during operation. [District Rule 2201]
8. Exhaust fan and baghouse shall be operated at all times during loading of meal. [District Rule 2201]
9. The District may require the flowrate of air into the baghouse to be reduced if emissions at baghouse exhaust exceed the permitted conditions. [District Rule 2201]
10. No more than 500 tons of meal shall be loaded per day. [District Rule 2201]
11. Daily emissions of PM10 shall not exceed 12.5 pounds per day. [District Rule 2201]
12. Pressure drop across bags shall be maintained between 2" and 6" W.C. [District Rule 2201]
13. Records of daily meal loaded shall be maintained, retained on the premises for at least two years and made available for District inspection upon request. [District Rule 1070]

CONDITIONS FOR PERMIT C-41-19-2

INSPECTION

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

WORKSHEET

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
903 HP COTTON SEED PREPARATION ROOM: CONSISTING OF A FLAKING MILL SERVED BY ONE 22" 1D-3D CYCLONE, A STEAM COOKER, TWO EXPANDERS, AND A COLLET COOLER/DRYER SERVED BY ONE 60" 1D-3D CYCLONE *REQUESTED CANCELLATION OF PERMIT, PER 7/17/00 LETTER*

CONDITIONS

1. 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 dark or darker than Ringelmann 1 or equivalent to 20% opacity. [District Rule 4101]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
4. The seed meats processing rate shall not exceed 600 tons per day. [District Rule 2201]
5. Records of daily seed meats processed shall be maintained, retained on the premises for at least two years and made available for District inspection upon request. [District Rule 1070]
6. Particulate matter (PM) concentration in exhaust from the 1D-3D cyclone serving the meats flaking mill shall not exceed 0.02 grains/dscf. [District Rule 2201]
7. Particulate matter (PM) concentration in exhaust from the 1D-3D cyclone serving the collet cooler/dryer shall not exceed 0.0095 grains/dscf. [District Rule 2201]
8. Emissions of PM10 from the seed meats preparation facility shall not exceed 11.0 lb/day. [District Rule 2201]

Attachment B

Historical Production Data

- Summary of Annual Throughputs and Production Rates
- Cotton Seed Crushed and Meal Produced
- Hexane Usage
- Natural Gas Usage

Summary of Annual Throughputs and Production Rates

HISTORICAL PRODUCTION DATA

Year	Seed Processed (tons/year)	Meal Produced (tons/year)	Hexane Usage (gallons/yr)	Natural Gas Use (Therms)	Natural Gas Use (MMSCF)
1979	126,700	69,685	126,350	no data	no data
1980	115,650	63,608	120,420	no data	no data
1981	132,500	72,875	144,630	no data	no data
1982	114,800	63,140	76,460	no data	no data
1983	46,500	25,575	36,225	no data	no data
1984	88,500	48,675	54,110	no data	no data
1985	113,500	62,425	75,290	no data	no data
1986	115,700	63,635	68,000	no data	no data
1987	105,500	58,025	78,160	no data	no data
1988	114,700	63,085	84,510	no data	no data
1989	114,000	62,700	103,090	no data	no data
1990	102,965	56,631	102,129	no data	no data
1991	118,446	65,145	84,273	no data	no data
1992	119,784	61,796	62,002	1,022,070	97.34
1993	130,779	69,761	84,875	1,026,900	97.8
1994	130,413	67,363	0	1,201,200	114.4
1995	100,363	50,468	105,496	938,173	
1996	123,888	65,885	111,992	1,114,967	
1997	74,527	39,140	154,594	766,508	
1998	57,137	29,948	102,007	407,158	
1999	0	0	0	0	
2000	0	0	0	0	
3 Year Avg (1996-1998)	***85,184.00***	***44,991.00***	***122,864.33***	***762,877.67***	
7 Year Avg (1992-1998)	***105,270.14***	***54,908.71***	***103,494.33***	***925,282.29***	
20 Year Avg (1979-1998)	***107,317.60***	***57,978.23***	***93,400.68***	***N/A***	

Two Year Averages						HISTORICAL PRODUCTION DATA				
Natural Gas Use (Therms)	*Hexane Usage (gallons/yr)*	*Meal Produced (tons/year)*	*Seed Processed (tons/year)*	*Two Year Periods*	Year	Seed Processed (tons/year)	Meal Produced (tons/year)	Hexane Usage (gallons/yr)	Natural Gas Use (Therms)	Natural Gas Use (MMSCF)
					1979	126,700	69,685	126,350	no data	no data
					1980	115,650	63,608	120,420	no data	no data
					1981	132,500	72,875	144,630	no data	no data
					1982	114,800	63,140	76,460	no data	no data
					1983	46,500	25,575	36,225	no data	no data
					1984	88,500	48,675	54,110	no data	no data
					1985	113,500	62,425	75,290	no data	no data
					1986	115,700	63,635	68,000	no data	no data
					1987	105,500	58,025	78,160	no data	no data
					1988	114,700	63,085	84,510	no data	no data
					1989	114,000	62,700	103,090	no data	no data
					1990	102,965	56,631	102,129	no data	no data
					1991	118,446	65,145	84,273	no data	no data
					1992	119,784	61,796	62,002	1,022,070	97.34
					1993	130,779	69,761	84,875	1,026,900	97.8
					1994	130,413	67,363	0	1,201,200	114.4
					1995	100,363	50,468	105,496	938,173	
1,026,570	*108,744*	*58,177*	*112,126*	*1995-1996*	1996	123,888	65,885	111,992	1,114,967	
940,738	***133,293***	***52,513***	***99,208***	***1996-1997***	1997	74,527	39,140	154,594	766,508	
586,833	*128,301*	*34,544*	*65,832*	*1997-1998*	1998	57,137	29,948	102,007	407,158	
					1999	0	0	0	0	
					2000	0	0	0	0	
					3 Year Avg (1996-1998)	***85,184.00***	***44,991.00***	***122,864.33***	***762,877.67***	
					7 Year Avg (1992-1998)	***105,270.14***	***54,908.71***	***103,494.33***	***925,282.29***	
					20 Year Avg (1979-1998)	***107,317.60***	***57,978.23***	***93,400.68***	***N/A***	

Cotton Seed Crushed and Meal Produced

(Tons/Quarter and Tons/Year)

YEAR 1990

Seed Crushed

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1990	?		1st Qtr	?
1-Apr	1990	?		2nd Qtr	?
1-Jul	1990	?		3rd Qtr	?
1-Oct	1990	?		4th Qtr	?
1-Jan	1991	?		**Total**	?
				reported	102,965
				difference	?

Meal Produced

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1990	?		1st Qtr	?
1-Apr	1990	?		2nd Qtr	?
1-Jul	1990	?		3rd Qtr	?
1-Oct	1990	?		4th Qtr	?
1-Jan	1991	?		**Total**	?

YEAR 1991

Seed Crushed

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1991	?		1st Qtr	?
1-Apr	1991	?		2nd Qtr	?
1-Jul	1991	?		3rd Qtr	?
1-Oct	1991	?		4th Qtr	?
1-Jan	1992	44,059		**Total**	?
				reported	188,446
				difference	?

Meal Produced

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1991	?		1st Qtr	?
1-Apr	1991	?		2nd Qtr	?
1-Jul	1991	?		3rd Qtr	?
1-Oct	1991	?		4th Qtr	?
1-Jan	1992	21,601		**Total**	?

YEAR 1992

Seed Crushed

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1992	44,059		1st Qtr	39,336
1-Apr	1992	83,395		2nd Qtr	35,881
1-Jul	1992	119,276		3rd Qtr	8,942
1-Oct	1992	8,942		4th Qtr	30,574
1-Jan	1993	39,516		**Total**	119,784
				reported	119,784
				difference	0

Meal Produced

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1992	21,601		1st Qtr	21,232
1-Apr	1992	42,833		2nd Qtr	19,251
1-Jul	1992	62,084		3rd Qtr	4,684
1-Oct	1992	4,684		4th Qtr	16,629
1-Jan	1993	21,313		**Total**	61,796

YEAR 1993

Seed Crushed

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1993	39,516		1st Qtr	33,364
1-Apr	1993	72,880		2nd Qtr	39,174
1-Jul	1993	112,054		3rd Qtr	28,507
1-Oct	1993	28,507		4th Qtr	29,734
1-Jan	1994	58,241		**Total**	130,779
				reported	130,779
				difference	0

Meal Produced

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1993	21,313		1st Qtr	17,916
1-Apr	1993	39,229		2nd Qtr	21,117
1-Jul	1993	60,346		3rd Qtr	15,125
1-Oct	1993	15,125		4th Qtr	15,603
1-Jan	1994	30,728		**Total**	69,761

YEAR 1994

Seed Crushed

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1994	58,241		1st Qtr	39,217
1-Apr	1994	97,458		2nd Qtr	33,369
1-Jul	1994	130,827		3rd Qtr	28,711
1-Oct	1994	28,711		4th Qtr	29,116
1-Jan	1995	57,827		**Total**	130,413
				reported	130,413
				difference	0

Meal Produced

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1994	30,728		1st Qtr	20,165
1-Apr	1994	50,893		2nd Qtr	16,771
1-Jul	1994	67,664		3rd Qtr	14,355
1-Oct	1994	14,355		4th Qtr	16,072
1-Jan	1995	30,427		**Total**	67,363

YEAR 1995

Seed Crushed

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1995	57,827		1st Qtr	31,728
1-Apr	1995	89,555		2nd Qtr	31,641
1-Jul	1995	121,196		3rd Qtr	10,936
1-Oct	1995	10,936		4th Qtr	26,058
1-Jan	1996	36,994		**Total**	100,363
				reported	96,984
				difference	-3,379

Meal Produced

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1995	30,427		1st Qtr	14,978
1-Apr	1995	45,405		2nd Qtr	14,954
1-Jul	1995	60,359		3rd Qtr	6,661
1-Oct	1995	6,661		4th Qtr	13,875
1-Jan	1996	20,536		**Total**	50,468

YEAR 1996

Seed Crushed

Data From Reports		Tons
1-Jan	1996	36,994
1-Apr	1996	69,494
1-Jul	1996	104,041
1-Oct	1996	24,773
1-Jan	1997	56,841

Quarterly Calculation	Tons
1st Qtr	32,500
2nd Qtr	34,547
3rd Qtr	24,773
4th Qtr	32,068
Total	123,888
reported	?
difference	?

Meal Produced

Data From Reports		Tons
1-Jan	1996	20,536
1-Apr	1996	37,748
1-Jul	1996	55,971
1-Oct	1996	13,068
1-Jan	1997	30,450

Quarterly Calculation	Tons
1st Qtr	17,212
2nd Qtr	18,223
3rd Qtr	13,068
4th Qtr	17,382
Total	65,885

YEAR 1997

Seed Crushed

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1997	56,841		1st Qtr	35,844
1-Apr	1997	92,685		2nd Qtr	28,987
1-Jul	1997	121,672		3rd Qtr	0
1-Oct	1997	0		4th Qtr	9,696
1-Jan	1998	9,696		**Total**	74,527
				reported	73,465
				difference	-1,062

Meal Produced

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1997	30,450		1st Qtr	19,266
1-Apr	1997	49,716		2nd Qtr	14,808
1-Jul	1997	64,524		3rd Qtr	0
1-Oct	1997	0		4th Qtr	5,066
1-Jan	1998	5,066		**Total**	39,140

YEAR 1998

Seed Crushed

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1998	9,696			
1-Mar	1998	29,025		1st Qtr	27,486
1-Apr	1998	8,157		2nd Qtr	29,651
1-Jul	1998	37,808		3rd Qtr	0
1-Oct	1998	0		4th Qtr	0
1-Jan	1999	0		**Total**	57,137
				reported	57,137
				difference	0

Meal Produced

Data From Reports		Tons		Quarterly Calculation	Tons
1-Jan	1998	5,066			
1-Mar	1998	15,226		1st Qtr	14,451
1-Apr	1998	4,291		2nd Qtr	15,497
1-Jul	1998	19,788		3rd Qtr	0
1-Oct	1998	0		4th Qtr	0
1-Jan	1999	0		**Total**	29,948

Hexane Usage

(Gallons/Month and Gallons/Year)

ANDERSON CLAYTON CORP.
CHOWCHILLA MILL HEXANE USAGE - GALLONS

	YEAR			
	1995	1996	1997	1998
JAN		9,767	8,489	22,562
FEB		6,171	8,741	20,683
MAR		5,223	-	16,695
APR		12,304	20,488	13,098
MAY		8,254	32,123	19,357
JUN		9,967	21,284	9,612
JUL	10,653	6,680	-	-
AUG	-	13,150	-	-
SEP	-	9,681	-	-
OCT	11,767	17,862	-	-
NOV	11,430	3,661	8,193	-
DEC	6,075	9,272	55,276	-
TOTAL	39,925	111,992	154,594	102,007

SOURCE: ACCOUNTING GENERAL LEDGER

HEXANE - CHOWCHILLA MILL

CALENDAR YEAR	TONS CRUSH	GALLONS ~~USED~~ PURCHASED. LOST	TONS USED		GALLONS/ TON	6.2 #/gal.
1979	126,700	126,350	392		1.00	
1980	115,650	120,420	373		1.04	
1981	132,500	144,630	448		1.09	
1982	114,800	76,460	237		.67	
1983	46,500	36,225	112		.78	
1984	88,500	54,110	168		.61	
1985	113,500	75,290	233		.66	
1986	115,700	68,000	211		.59	
1987	105,500	78,160	242		.74	4.6
1988	114,700	84,510	262	#/gal	.74	4.6
1989	114,000	103,090	320	6.2	.90	5.6 lb VCC [illegible]
1990	102,965	102,129	317	6.2	.99	6.1
1991	118,446	84,273	261	6.2	.71	4.4
1992	119,784	62,350	178	5.7	.52	3.2
1993	130,779	84,875	242	5.7	.65	4.0
	1630,024	1300,872	3996			
ave. 108,668		86,725	266.4			

.90 gal/ton × 114,000 tons × 6.2#/gal   4.6

3818
+

84-93 (5yr) ⇒ 585974
436717 → 4.248
(4.25 lb/ton)

4.5 lb/ton VOC (hexane) seed [illegible]

4/16/90

.90 gal/ton × 6.2#/gal × 1 ton/2000# =

90-93 3yr
369009/231498 ⇒ 3.576   318.1 tons

De Frank says use these 1989 figures & he'll supply the N.G. usage. at 6 therms per ton should get 684,000 therms

Natural Gas Usage

(Therms/Month)

Location: Chowchilla Mill - Gas

Account: FTN AD 02741-1

Meter: 00000

Utility Company: Pacific Gas & Electric

Year: 1995

Rate: GIPBS

Read Dates		Billing	Gas		Unit Cost	Tx Ohio	Diff	Adjust
From	To	Days	Therm	Total	Per Therm	dth	+-/	+/-
12/31	1/31	31	111555	$11,276.41	0.101	11250	262.5	$414.71
1/31	2/28	31	90270	$9,548.35	0.106	11500	-2184.1	($2,904.90)
2/28	3/31	31	102654	$10,637.80	0.104	9800	793.9	$905.04
3/31	4/30	30	98365	$10,007.62	0.102	11490	-1338.7	($1,419.06)
4/30	5/31	31	101835	$10,310.78	0.101	10245	264.4	$296.10
5/31	6/30	30	85335	$8,587.83	0.101	9000	-193.4	($243.72)
6/30	7/31	31	92665	$9,297.48	0.100	9544	19.0	$32.54
7/31	8/31	31	16417	$2,330.00	0.142	1671	23.2	$40.89
8/31	9/30	30	0	$839.33		23	23.0	$43.24
9/30	10/31	31	37222	$4,219.13	0.113	3777	64.3	$120.90
10/30	11/30	30	100018	$11,620.15	0.116	10434	-112.1	($197.37)
11/30	12/31	31	101837	$12,143.24	0.119	10687	-177.4	($312.26)

Total 938173 $100,818.12

Remarks:

'95 304,479
'96 289,445
'97 335,553
'98 311,456

01 - Mill

From: "Carlson, Robert" <RCC7@pge.com>
To: "Norm Hansen (E-mail)" <NormH@andersonclayton.com>
Date: 12/28/00 11:50AM
Subject: FTN AD 02741

YEAR	YYYYMM	CONTROL_NUM	ACCT_NUM	SERVICE STREET	SERVICE CITY	PRIOR_READ_DATE	CURRENT_READ_DATE	BILLING_PERIOD	GAS_RATE	THERMS	GAS_CHARGES
1996	199601	5849404	FTNAD02741	25184 RD 16	MADERA	12/31/1995	1/31/1996	31	GIPBS	102,885	$13,710.90
1996	199602	5849404	FTNAD02741	25184 RD 16	MADERA	1/31/1996	2/29/1996	29	GIPBS	96,812	$12,950.38
1996	199603	5849404	FTNAD02741	25184 RD 16	MADERA	2/29/1996	3/31/1996	31	GIPBS	70,248	$9,623.77
1996	199604	5849404	FTNAD02741	25184 RD 16	MADERA	3/31/1996	4/30/1996	30	GIPBS	99,436	$11,655.19
1996	199605	5849404	FTNAD02741	25184 RD 16	MADERA	4/30/1996	5/31/1996	31	GIPBS	104,620	$12,219.73
1996	199606	5849404	FTNAD02741	25184 RD 16	MADERA	5/31/1996	6/30/1996	30	GIPBS	95,980	$11,278.83
1996	199607	5849404	FTNAD02741	25184 RD 16	MADERA	6/30/1996	7/31/1996	31	GIPBS	97,189	$11,410.49
1996	199608	5849404	FTNAD02741	25184 RD 16	MADERA	7/31/1996	8/31/1996	31	GIPBS	100,755	$11,306.96
1996	199609	5849404	FTNAD02741	25184 RD 16	MADERA	8/31/1996	9/30/1996	30	GIPBS	29,069	$3,817.81
1996	199610	5849404	FTNAD02741	25184 RD 16	MADERA	9/30/1996	10/31/1996	31	GIPBS	79,144	$8,918.08
1996	199611	5849404	FTNAD02741	25184 RD 16	MADERA	10/31/1996	11/30/1996	30	GIPBS	113,924	$14,343.76
1996	199612	5849404	FTNAD02741	25184 RD 16	MADERA	11/30/1996	12/31/1996	31	GIPBS	111,494	$14,054.98
1997	199701	5849404	FTNAD02741	25184 RD 16	MADERA	12/31/1996	1/31/1997	31	GIPBS	116,296	$14,625.65
1997	199702	5849404	FTNAD02741	25184 RD 16	MADERA	1/31/1997	2/28/1997	28	GIPBS	108,212	$13,664.94
1997	199703	5849404	FTNAD02741	25184 RD 16	MADERA	2/28/1997	3/31/1997	31	GIPBS	111,045	$14,001.62
1997	199704	5849404	FTNAD02741	25184 RD 16	MADERA	3/31/1997	4/30/1997	30	GIPBS	111,848	$12,270.57

1997	199705	5849404	FTNAD02741	25184 RD 16	MADERA			
4/30/1997	5/31/1997	31	GIPBS	118,092	$13,247.93			
1997	199706	5849404	FTNAD02741	25184 RD 16	MADERA			
5/31/1997	6/30/1997	30	GIPBS	83,385	$9,818.84			
1997	199707	5849404	FTNAD02741	25184 RD 16	MADERA			
6/30/1997	7/31/1997	31	GIPBS	1,532				
$970.53								
1997	199708	5849404	FTNAD02741	25184 RD 16	MADERA			
7/31/1997	8/31/1997	31	GIPBS	-				
$804.92								
1997	199709	5849404	FTNAD02741	25184 RD 16	MADERA			
8/31/1997	9/30/1997	30	GIPBS	-				
$804.92								
1997	199710	5849404	FTNAD02741	25184 RD 16	MADERA			
9/30/1997	10/31/1997	31	GIPBS	-				
$804.92								
1997	199711	5849404	FTNAD02741	25184 RD 16	MADERA			
10/31/1997	11/30/1997	30	GIPBS	25,047	$3,921.52			
1997	199712	5849404	FTNAD02741	25184 RD 16	MADERA			
11/30/1997	12/31/1997	31	GIPBS	103,256	$13,653.06			
1998	199801	5849404	FTNAD02741	25184 RD 16	MADERA			
12/31/1997	1/31/1998	31	GIPBS	104,091	$12,297.22			
1998	199802	5849404	FTNAD02741	25184 RD 16	MADERA			
1/31/1998	2/28/1998	28	GIPBS	104,519	$12,344.51			
1998	199804	5849404	FTNAD02741	25184 RD 16	MADERA			
3/31/1998	4/30/1998	30	GIPBS	102,820	$12,297.44			
1998	199805	5849404	FTNAD02741	25184 RD 16	MADERA			
4/30/1998	5/31/1998	31	GIPBS	106,950	$5,238.46			
1998	199806	5849404	FTNAD02741	25184 RD 16	MADERA			
5/31/1998	6/30/1998	30	GIPBS	84,196	$7,215.03			
1998	199807	5849404	FTNAD02741	25184 RD 16	MADERA			
6/30/1998	7/31/1998	31	GIPBS	6,581				
$1,389.25								
1998	199808	5849404	FTNAD02741	25184 RD 16	MADERA			
7/31/1998	8/31/1998	31	GIPBS	1,247				
$988.88								
1998	199809	5849404	FTNAD02741	25184 RD 16	MADERA			
8/31/1998	9/30/1998	30	GIPBS	641				
$896.15								
1998	199810	5849404	FTNAD02741	25184 RD 16	MADERA			
9/30/1998	10/31/1998	31	GIPBS	204				
$862.83								
1998	199811	5849404	FTNAD02741	25184 RD 16	MADERA			
10/31/1998	11/30/1998	30	GIPBS	-				
$847.28								
1998	199812	5849404	FTNAD02741	25184 RD 16	MADERA			
11/30/1998	12/31/1998	31	GIPBS	-				

$321.42
1999 199901 5849404 FTNAD02741 25184 RD 16 MADERA
12/31/1998 1/31/1999 31 GIPBS -
$329.45
1999 199902 5849404 FTNAD02741 25184 RD 16 MADERA
1/31/1999 2/28/1999 28 GIPBS 307
$358.38
1999 199903 5849404 FTNAD02741 25184 RD 16 MADERA
2/28/1999 3/31/1999 31 GIPBS -
$329.45
1999 199904 5849404 FTNAD02741 25184 RD 16 MADERA
3/31/1999 4/30/1999 30 GIPBS -
$329.45
1999 199905 5849404 FTNAD02741 25184 RD 16 MADERA
4/30/1999 5/31/1999 31 GIPBS -
$86.84
1999 199906 5849404 FTNAD02741 25184 RD 16 MADERA
5/31/1999 6/30/1999 30 GIPBS -
$11.02
1999 199907 5849404 FTNAD02741 25184 RD 16 MADERA
6/30/1999 7/31/1999 31 GIPBS -
$11.02

Attachment C

PM10/TSP Source Test Results for Cooler Dryer Fan Cyclone, Permit Unit C-41-19-2

ANDERSON CLAYTON
3325 Figarden Drive
Fresno, CA 93711

Attn: Steve White

PM10 & TOTAL PARTICULATE TESTING
COOLER DRYER FAN CYCLONE
ATC #C-41-9-2
April 29, 1998

Submitted to
San Joaquin Valley Unified APCD
1999 Tuolumne Suite 200
Fresno, CA 93721

Attn: Gabe Lazar

Prepared by
AIRx TESTING
2175 Goodyear Avenue Unit #105
Ventura, CA 93003

Job Number
16031

Laboratory Report Number
397-010

Test Team Leader
Cam Donnahoo

Results Verified By:
Tom Porter
Partner

Submitted
July 15 , 1998

AIRx TESTING

PARTICULATE EMISSION SUMMARY
4/29/98

	Run #1	Run #2	Run #3	Average
Total Particulate				
gr/DSCF	0.0132	0.0119	0.0035	***0.0095***
lb/hr	0.76	0.71	0.21	***0.56***
Particule Size Distribution				
+10µ (%)	20.5	18.1	50.1	***29.6***
-10µ (%)	79.5	81.9	49.9	***70.4***
<10µ Results				
gr/DSCF	0.0105	0.0098	0.0018	***0.0074***
lb/hr	0.60	0.58	0.10	***0.43***
Exhaust Flowrate, DSCFM	6737	6903	6794	***6811***

Attachment D

Emissions from Hexane Recovery & Oil Extraction Unit

- VOC Calculations for Hexane Recovery and Oil Extraction Unit, Permit Unit C-41-9-1 (Project 940442)
- VOC Source Test Results for Hexane Recovery and Oil Extraction Unit, Permit Unit C-41-9-1

VOC Calculations for Hexane Recovery and Oil Extraction Unit, Permit Unit C-41-9-1 (Project 940442)

San Joaquin Valley
Unified Air Pollution Control District
Engineering Evaluation

ANDERSON CLAYTON CORP. - OIL EXTRACTION UNIT, CHOWCHILLA
 # 940442

Engineer: Tope Adewusi
Date: December 13, 1994

Facility: Anderson Clayton Corporation
Mailing Address: P.O. Box 847
Chowchilla, CA 93610

Contact Name: Steve White
Phone: (209) 487-7932

I. PROPOSAL:

The primary business of this facility is cotton seed oil and nut oil extraction. The applicant proposes to modify the existing Authority to Construct, ATC #C-41-9-1 (copy attached) by implementing the following:

(1) Removing the mechanical oil extractor which removes about 67% of the seed or nut oil, and replacing it with a system that uses 100% extraction by hexane;

(2) Increasing seed throughput from 500 tons/day to 600 tons/day;

(3) Replacing the existing mineral oil scrubber which controls hexane emissions with a larger unit expected to have a higher control efficiency.

The applicant does not expect to have an increase in hexane emission. In fact he is willing to accept hexane emission limitation kept to the current level. The District will require source tests to ensure that hexane emissions do not exceed current permit limitations.

The oil mill will continue to operate 24 hours per day, 7 days per week and 52 weeks per year.

II. APPLICABLE RULES:

Rule 2201 New and Modified Stationary Source Review Rule (Adopted September 19, 1991; Amended October

	21, 1993)
Rule 3010	Permit Fees (Adopted May 21, 1992; Amended December 17, 1992)
Rule 4101	Visible Emissions (Adopted May 21, 1992; Amended December 17, 1992)
Rule 4102	Nuisance (Adopted May 21, 1992; Amended December 17, 1992)
Rule 4691	Vegetable Oil Processing Operations (Adopted April 11, 1991; Amended December 17, 1992)
CHSC 42301.6	Source location within 1,000 feet from a school site.

III. PROJECT LOCATION:

25184 Road 16, Chowchilla, CA

Applicant states that there is a school (Chowchilla High School) within 1,000 feet of the project site.

IV. PROCESS DESCRIPTION:

Cotton seeds from local cotton gins are trucked to the facility and unloaded by conveyor belts onto open stockpiles, which are covered by tarps when fully loaded. The applicant is proposing to increase his seed throughput from 500 to 600 tons per day.

Cottonseed meats are mixed with water. Moisturized meats are run through three crushing rolls. Crushed meats are run through one horizontal opposed flaking roll. Flaked meats are cooked in six precookers and cooked meats are formed into collets by two expanders. The collets enter solvent (hexane) plant where all the oil is extracted and refined.

The hexane solvent plant will operate in the same way as the existing system. Some of the equipment will be changed to accommodate the increase in oil. The mixture of oil and solvent is called miscella. Miscella from the evaporator will be pumped to the refinery batch/surge tanks. Miscella will discharge from the tanks and be mixed with caustic soda prior to the sonulator mixer. The miscella and caustic soda mixture will go through the reactor tubes before entering the

centrifuge. The primary centrifuge will discharge soapstock and refined miscella. Soapstock will be pumped to the disolventizer. Refined miscella will be mixed with water before entering the water wash centrifuge. Refined dry miscella will be discharged from the centrifuge and go to the second effect evaporator to continue hexane recovery. Water will discharge to the sump and be reused in the mill processes.

V. REVIEW OF PROPOSED CONTROL EQUIPMENT

Hexane emissions are controlled by a modified and bigger mineral oil, countercurrent, packed tower scrubber.

Air saturated with hexane and water vapor enters the bottom of the column from the vent condenser and passes upward through a wetted packed bed. Mineral oil will absorb more than 90% of hexane from the air. The vent fan discharges the air, water vapor, and unabsorbed hexane vapor to the atmosphere. The volume of hexane vapor discharged to the atmosphere is a function of air flow and mineral oil column capacity.

Air enters the plant with the prepared meats. The quantity of prepared meats will increase but the volume of air will not change.

With the addition of larger mineral oil column (larger contact area) and unchanged air flow, the removal efficiency is expected to increase. The proposed tower will utilize more ceramic saddles for packing. The packing increases hexane absorption efficiency by increasing the surface area over which the scrubber mineral oil flows, presenting a large area for mass transfer to occur. Hexane purchases over a ten year period averaged 0.8 gallons per ton of seed crushed. Average purchases are expected to be equal or less with the proposed plant.

The scrubber design bases are:

Inlet gas to absorber	=	75 cfm dry air saturated with hexane and water at 100^0F maximum
Exhaust gas	=	75 cfm dry air saturated with water and at 90% LEL of hexane
Scrubber efficiency	=	95% minimum. However, actual efficiency, which will be demonstrated by source testing is expected to go up higher.

Vol. of proposed column	=	Proposed column is 16" diameter and 25' long implying that the volume = π x $(16'/12)^2$ x 1/4 x 25' = 34.9 cf.
Volume of existing col.	=	Existing column is 12" diameter and 20' long implying that the volume = π x $(12'/12)^2$ x 1/4 x 20' = 15.7 cf. The increase by (34.9/15.7 x 100%) 222% is expected to translate into improved control efficiency. While actual dimensions do not accurately reflect the capacity, the relative sizes do approximate a larger contact area.

Design check on hexane velocity:

The flow rate = 75 cfm = 75/60 cfs = 1.25 cubic feet per second.
Hexane duct inlet diameter = 18" = 1.5' (per applicant)

Therefore, hexane velocity = flow rate/duct cross-sectional area

= $(1.25 \times 4)/\pi \times 1.5^2$ ft/sec = 0.9 ft/sec

According to Section 4-40 of EPA Course 415 (Control of Gaseous Emissions) the ideal velocity in the packed bed scrubbers is approximately 1 to 3 ft/sec. Since the calculated emission is close to that range, the tower column design is acceptable.

VI. EMISSIONS ESTIMATE:

A. Best Available Control Technology (BACT) calculation:

Assumptions:

- Hexane recovery operation is 24 hours per day, 365 days/year.
- All hexane losses from the solvent extraction unit are volatile organic compounds (VOC) emitted to the atmosphere. It is also assumed that the VOC retained in the meal are eventually emitted to the atmosphere.
- The VOC emitted per ton of seed crushed, shall be assumed to be equivalent to the average quantity of hexane lost

per ton of cottonseed crushed in 1991. Since we had 2200 lbs VOC/500 tons of seed per day, an emission factor (EF) of (2200/500) 4.4 lb VOC per ton of seed crushed was established and used on the existing Permit #C-41-9-1. Emission factor prior to this proposal, EF_{before} = 4.4 #/t

- The VOC emissions from the seeds and nuts in this process shall be assumed to depend on the quantity of seed processed and not on the quantity of oil produced. Since VOC emissions is expected to remain at 2200 lbs/day for 600 tons of seeds, then an emission factor of (2200/600) 3.7 lb VOC per ton of seed crushed will be established for the proposed modified Permit #C-41-9-2. Emission factor based on this proposal, EF_{after} = 3.7 lbs/ton.

- The emissions from the extraction of seed oils and nuts shall be assumed to be equivalent to the emissions from the extraction of cottonseed oil.

The following acronyms which are fully defined in Section 6.2 of Rule 2201, stand for:

HAPE = Historical Adjusted Potential Emissions
IPE = Increase in Permitted Emissions
PE = Potential to Emit
PEPM = Potential to Emit Prior to Modification
SSPE = Stationary Source Potential to Emit
ΔCE = Change in Control Efficiency

Hexane emissions will be limited to the previously established limit of 2200 lb VOC/day based on processing 500 tons of seed per day.

From Section 6.2.7 of Rule 2201,

HAPE = PEPM(1 - ΔCE) = 2200 lbs/day x (1 - ΔCE)

From Policy # NSR/ERC 5-1 dated 3/25/92,

$\Delta CE = 1 - EF_{after}/EF_{before} = 1 - 3.67/4.4 = 0.17$

Therefore,
HAPE = 2200(1 - 0.17) = 1835

IPE = PE - HAPE = 2200 - 1835 = 365 lbs/day
Since IPE is greater than 2 lbs/day, BACT is required.

IPE for BACT calculation exceeds 100 lbs/day, but we use true permitted emissions changes to determine offsets, SSPE, NSR balance and public noticing. So public noticing is not required since $PE_{before} = PE_{after}$ = 2200 lbs/day.

VOC Source Test Results for Hexane Recovery and Oil Extraction Unit, Permit Unit C-41-9-1

ANDERSON CLAYTON
3325 Figarden Drive
Fresno, CA 93711

Attn: Steve White

VOLATILE ORGANIC COMPOUNDS TESTING
MOS SCRUBBER SYSTEM

April 29, May 5, May 27 & June 11, 1998

Prepared by
AIRx TESTING
2175 Goodyear Avenue Unit #105
Ventura, CA 93003

Job Number
16031

Laboratory Report Number
397-010

Test Team Leader
Cam Donnahoo

Results Verified By:
Tom Porter
Partner

Submitted
July 16 , 1998

AIRx TESTING

VOC's EMISSION SUMMARY

	Run #1	Run #2	Run #3	Average
4/29/98				
Volatile Orgainic Compounds				
lb/hr (Outlet)	1.64	1.67	1.27	*1.52*
lb/hr (Inlet)	6.93	7.40	7.07	*7.14*
Reduction, %	-	-	-	*78.7*
Exhaust Flowrate, DSCFM	-	-	-	*49*
5/5/98				
Volatile Orgainic Compounds				
lb/hr (Outlet)		4.61		*4.61*
lb/hr (Inlet)		37.55		*37.55*
Reduction, %		-		*87.8*
Exhaust Flowrate, DSCFM				*49*
5/27/98				
Volatile Orgainic Compounds				
lb/hr (Outlet)	10.12	14.53	11.19	*11.95*
lb/hr (Inlet)	11.30	15.04	7.10	*11.15*
Reduction, %				*0.0*
Exhaust Flowrate, DSCFM				*46*
6/11/98				
Volatile Orgainic Compounds				
lb/hr (Outlet)	41.95	32.96		*37.46*
lb/hr (Inlet)	33.78	71.62		*52.70*
Reduction, %				*28.9*
Exhaust Flowrate, DSCFM				*46*

Attachment E

Summary of PM10 Emission Factors for Cottonseed Oil Mills Prepared by Fresno County APCD, 4/10/1991

FRESNO COUNTY
AIR POLLUTION CONTROL DISTRICT

COPY

ENGINEERING REVIEW

OF

PRODUCERS COTTONSEED OIL MILL
2365 E. NORTH
FRESNO, CA 93721

SHUTDOWN OF COTTONSEED OIL MILL

Prepared By:

Roger A. Isom
Air Quality Engineer II

Reviewed By:

Martin Keast
Supervising Air Quality Engineer MK

4/10/91

ATTACHMENT C

Post-It™ brand fax transmittal memo 7671	# of pages ▸
To L. Stern	From R. McVaigh
Co. ARB	Co. SJVAPCD
Dept.	Phone #
Fax # 1-916-445-5023	Fax #

PM10 EMISSIONS

COPY

P/O#1030040101 - Unloading and Storage

Emissions from this process are mostly fugitive; and therefore, not verifiable. Hence, no credits will be granted for this operation.

P/O#1030040102 - Cleaning and Delinting

This is the largest source of PM10 emissions in the facility. Emissions will be calculated by using source test results (see attached) and applying them throughout the delinting stage.

Processes: Seed Cleaning
1st Cut Lint Cleaning
2nd Cut Lint Cleaning
1st Cut Lint Beaters
2nd Cut Lint Beaters
Motes
Bates Press Room

[Please note, that emissions from these processes are only from cottonseed,and not safflower.]

PM10 Emissions =
(source test results) x (# cyclones) x (Tonnage) x (PM10 Fraction)

Seed Cleaning:

12-44 " "2D-2D" cyclones
Test = .008 g/dscf > per cyclones
= .012 lb/ton

$$\text{Emissions} = (.012 \text{ lb/ton})\,(12 \text{ cyclones})\,(245.9 \text{ tons/day})\,(0.5\frac{\text{lbPM10}}{\text{lbPM}})$$

PM10 = 17.7 lb/day

1st Cut Lint Cleaning -

16-36" "2D-2D" cyclone
Test = .007 g/dscf> cyclone
.08 lb/ton

$$\text{Emissions} = (.08 \text{ lb/ton})\,(16 \text{ cyclones})\,(245.9\frac{\text{tons}}{\text{day}})\,(0.5\,\frac{\text{lbpm10}}{\text{lbPM}})$$

PM10 = 131.0 lb/day

2nd Cut Lint Cleaning -

32-364 "1D-3D" cyclones
Test = .021 g/dscf
> per cyclone
.022 lb/ton

Emissions = (.~~22~~ .022 lb/ton)(32 cyclones)245.9 tons/day)(0.5lbPM10/lbPM)

PM10 = 86.56 lb/day

1st Cut Lint Beaters -

4-30" "20-2D" cyclones

Test = .21 g/dscf
> per cyclone
.019 lb/ton

Emissions = (.019 lb/ton)(4 cyclones)(245.9tons/day)(.5lbPM10/lbPM)

PM10 = 9.34 lb/day

2nd Cut Lint Beaters

8-26""10-30" Cyclones

Test = 0.41 g/dscf
> per cyclone
.039 lb/bale

Emissions = (.011 lb/ton)(8 cyclones)(245.9 tons/day)(0.5lbPM10/lbPM)

PM10 = 10.82 lb/day

Bake Press Room

3-62" "1D-3D"
1-36" "2D-2D"
1-26 "2D-2D"

Test = .072 g/dscf
> per cyclone ("20-2D")
.24 lb/ton

$$PM10 = (.24 lb/ton)(245.9 tons)(3 \text{ cyclones})(0.5 \frac{lb PM10}{lb PM10})$$

PM10 = 92.21 lb/day

P/O#1030040103 - Hulling & Separating Room

Results from the RANCHERS COTTON OIL MILL will be used since no source test results exist from PRODUCERS.

Source Tests Results = 1.47 lb/hr = .098 lb/ton (TOTAL)

(Ranchers 8/24-8/25/76) 15 tons/hr
Chronocology)

$$PM10 = (245.9 tons/day)(.098 lb/ton)(0.5 \frac{lb PM10}{lb PM10})$$

PM10 = 12.05 lb/day For Cottonseed

$$PM10 = (136.7 tons)(.098 lb/day)(0.5 \frac{lb PM10}{lb PM10})$$

PM10 = 6.7 lb/day for Safflower

TOTAL = 18.75 lb/day

For the rest of the plant, no actual source testing was performed. An average lb/ton emission factor from the source test results will be used since it was not documented if the tests were performed an "1D-3D" or "2D-2d" cyclones, the average lb/ton emission factor for "2D-2D" cyclones will be used for all cyclones. The average emission factor based on source test results (see attached summary) is 0.06 $\frac{lbPM}{ton}$ (per cyclone).

P/O# 1030040104 - Solvent Extraction

PM10 emissions from meal handling

1-"1D-2D" cyclone @ 15415 cfm

$$PM10 = (.06\ \frac{lbPM}{ton})(245.9\ \frac{tons}{day})(0.5\frac{lbPM10}{lbPM10})$$

PM10 = 7.4 lb/day

P/O#1030040105 - Bulk Meal Storage

PM emissions are from meal loading for both cottonseed and safflower.

4-"2D-2D" cyclones

$$PM10 = (.06\frac{lbPM}{ton})(4\ cyclones)(245.9+136.7\frac{tons}{day})(0.5\frac{lbPM10}{Pm10})$$

$$PM10 = 45.9\ \frac{lb}{day}$$

P/O#1030040106 - Meal Processing

PM10 emissions from cotton seed and safflower

2 - Baghouses
5 - "1D-3D" cyclones

$$PM10 = (.06\frac{lbPM}{ton})(5\ cyclones)(245.9+136.7\frac{tons}{day})(\frac{lbpm10}{lbPM})$$

Attachment F

Potential to Emit Calculations for the Chowchilla Oil Mill Facility (Project #930468)

Table 1. Potential to Emit (PE)

Operation (PTO#)	E.F. (lb PM /ton)	Thruput ton/day	PM10/PM	# of cyclones	lb/day (ton/yr)
Receiving C-41-4-0	1.0	500	0.5	--	250 (41.88)
Seed Cleaning C-41-6-1	0.012	500	0.5	15	45 (7.54)
1st Cut Linter C-41-5-0	0.08	500	0.5	7	140 (23.45)
2nd Cut Linter C-41-7-0	0.022	500	0.5	17	93.5 (15.66)
Hulling C-41-8-1	0.09	500	0.5	5	112.5 (18.84)
Storage & Loading C-41-10-0 & C-41-13-0	0.01 gr/dscf	2664 scfm	34560 min/day	1lb/ 7000 gr	131.5 (22.03)
Hull Storage C-41-14-0	0.06	500	0.5	1	15.0 (12.56)
Boiler PM10 C-41-12-0	0.005 lb/MMBtu	13.5 MMBtu/hr	24 hr/day	--	43.1 (7.22)
TOTAL PM10	--	--	--	--	**830.6 (139.12)**
Hexane Loss C-41-9-0 & C-41-11-0	5.58 lb VOC/ton	500	--	--	2,791 (467.5)
Boiler VOC	0.003 lb/MMBtu	13.5 MMBtu/hr	24 hr/day	--	0.96 (0.16)
TOTAL VOC	--	--	--	--	**2,792 (467.66)**
Boiler NOx (PENOx)	0.133 lb/MMBtu	13.5 MMBtu/hr	24 hr/day	--	43.1 (7.22)
Boiler CO (PECO)	0.033 lb/MMBtu	13.5 MMBtu/hr	24 hr/day	--	10.7 (1.79)
Boiler SOx (PESOx)	0.001 lb/MMBtu	13.5 MMBtu/hr	24 hr/day	--	0.3 (0.05)

Attachment G

AP-42 Emission Factors for Natural Gas Combustion

Table 1.4-1. EMISSION FACTORS FOR NITROGEN OXIDES (NO_x) AND CARBON MONOXIDE (CO) FROM NATURAL GAS COMBUSTION[a]

Combustor Type (MMBtu/hr Heat Input) [SCC]	NO_x[b]		CO	
	Emission Factor ($lb/10^6$ scf)	Emission Factor Rating	Emission Factor ($lb/10^6$ scf)	Emission Factor Rating
Large Wall-Fired Boilers (>100) [1-01-006-01, 1-02-006-01, 1-03-006-01]				
Uncontrolled (Pre-NSPS)[c]	280	A	84	B
Uncontrolled (Post-NSPS)[c]	190	A	84	B
Controlled - Low NO_x burners	140	A	84	B
Controlled - Flue gas recirculation	100	D	84	B
Small Boilers (<100) [1-01-006-02, 1-02-006-02, 1-03-006-02, 1-03-006-03]				
Uncontrolled	100	B	84	B
Controlled - Low NO_x burners	50	D	84	B
Controlled - Low NO_x burners/Flue gas recirculation	32	C	84	B
Tangential-Fired Boilers (All Sizes) [1-01-006-04]				
Uncontrolled	170	A	24	C
Controlled - Flue gas recirculation	76	D	98	D
Residential Furnaces (<0.3) [No SCC]				
Uncontrolled	94	B	40	B

[a] Reference 13. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. To convert from $lb/10^6$ scf to $kg/10^6$ m^3, multiply by 16. Emission factors are based on an average natural gas higher heating value of 1,020 Btu/scf. To convert from $lb/10^6$ scf to lb/MMBtu, divide by 1,020. The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. SCC = Source Classification Code. ND = no data. NA = not applicable.

[b] Expressed as NO_2. For large and small wall fired boilers with SNCR control, apply a 24 percent reduction to the appropriate NO_x emission factor. For tangential-fired boilers with SNCR control, apply a 13 percent reduction to the appropriate NO_x emission factor.

[c] NSPS=New Source Performance Standard as defined in 40 CFR 60 Subparts D and Db. Post-NSPS units are boilers with greater than 250 MMBtu/hr of heat input that commenced construction modification, or reconstruction after August 17, 1971, and units with heat input capacities between 100 and 250 MMBtu/hr that commenced construction modification, or reconstruction after June 19, 1984.

TABLE 1.4-2. EMISSION FACTORS FOR CRITERIA POLLUTANTS AND GREENHOUSE GASES FROM NATURAL GAS COMBUSTION[a]

Pollutant	Emission Factor ($lb/10^6$ scf)	Emission Factor Rating
CO_2[b]	120,000	A
Lead	0.0005	D
N_2O (Uncontrolled)	2.2	E
N_2O (Controlled-low-NO_X burner)	0.64	E
PM (Total)[c]	7.6	D
PM (Condensable)[c]	5.7	D
PM (Filterable)[c]	1.9	B
SO_2[d]	0.6	A
TOC	11	B
Methane	2.3	B
VOC	5.5	C

[a] Reference 13. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. Data are for all natural gas combustion sources. To convert from $lb/10^6$ scf to $kg/10^6$ m^3, multiply by 16. To convert from $lb/10^6$ scf to lb/MMBtu, divide by 1,020. The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. TOC = Total Organic Compounds. VOC = Volatile Organic Compounds.

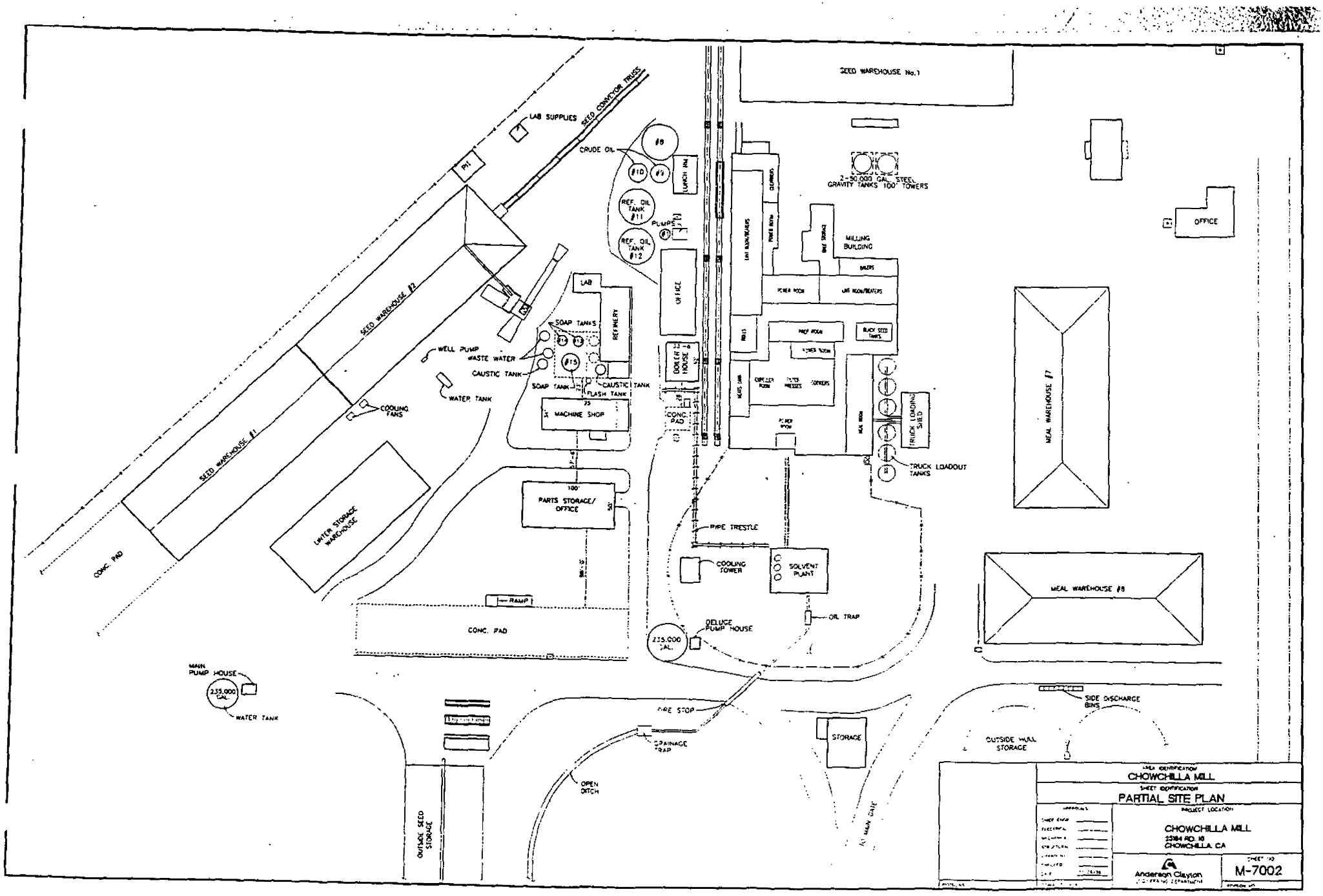
[b] Based on approximately 100% conversion of fuel carbon to CO_2. $CO_2[lb/10^6 scf] = (3.67)(CON)(C)(D)$, where CON = fractional conversion of fuel carbon to CO_2, C = carbon content of fuel by weight (0.76), and D = density of fuel, 4.2×10^4 $lb/10^6$ scf.

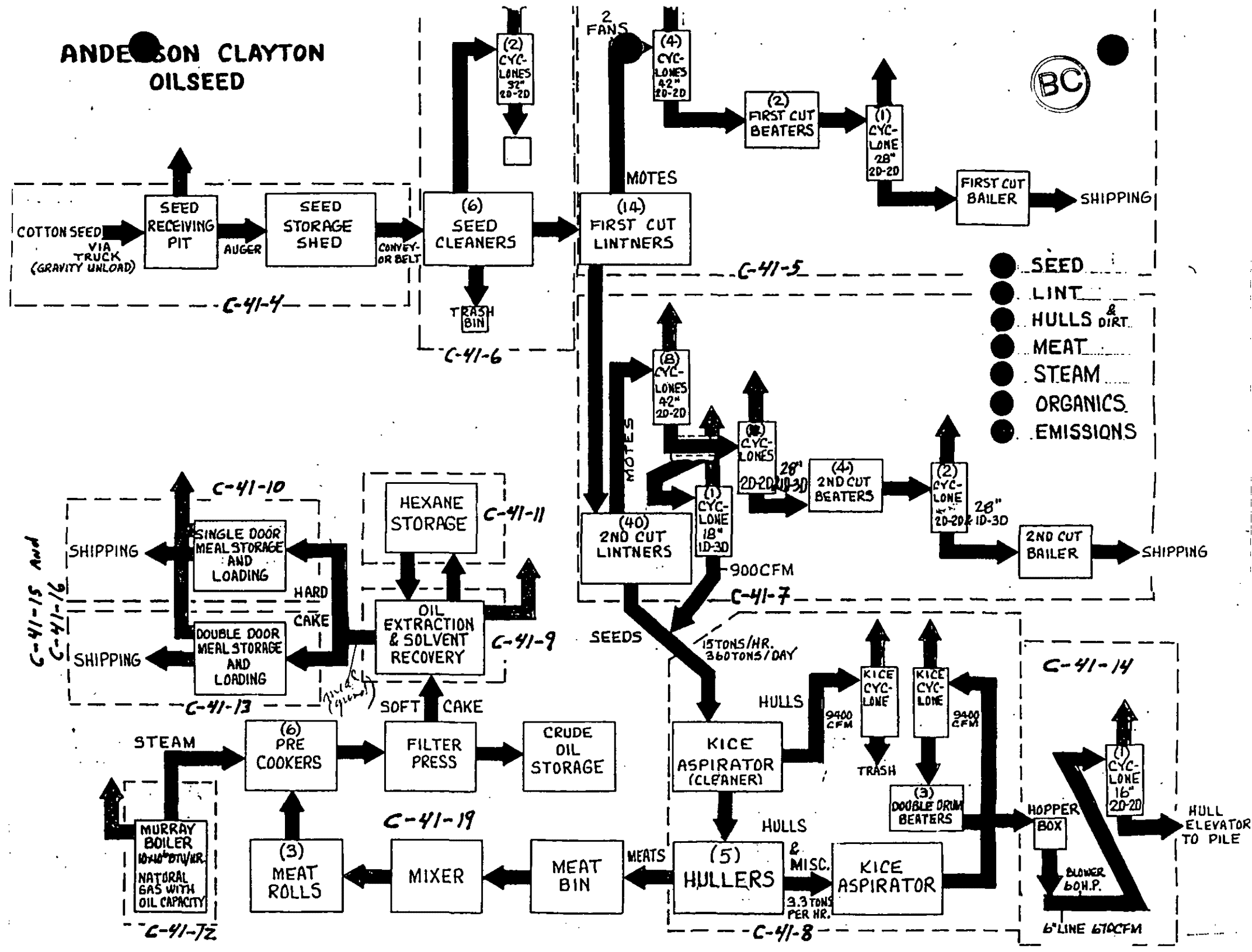
[c] All PM (total, condensible, and filterable) is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors presented here may be used to estimate PM_{10}, $PM_{2.5}$ or PM_1 emissions. Total PM is the sum of the filterable PM and condensible PM. Condensible PM is the particulate matter collected using EPA Method 202 (or equivalent). Filterable PM is the particulate matter collected on, or prior to, the filter of an EPA Method 5 (or equivalent) sampling train.

[d] Based on 100% conversion of fuel sulfur to SO_2. Assumes sulfur content is natural gas of 2,000 grains/10^6 scf. The SO_2 emission factor in this table can be converted to other natural gas sulfur contents by multiplying the SO_2 emission factor by the ratio of the site-specific sulfur content (grains/10^6 scf) to 2,000 grains/10^6 scf.

Attachment H

Facility and Process Flow Diagrams


SEED WAREHOUSE No. 1
LAB SUPPLIES
SEED CONVEYOR TRUSS
CRUDE OIL
#8
#10
#9
REF. OIL TANK #11
REF. OIL TANK #12
PUMPS
LUNCH RM
2-50,000 GAL. STEEL GRAVITY TANKS 100' TOWERS
OFFICE
MILLING BUILDING
LAB
SOAP TANKS
REFINERY
OFFICE
BOILER HOUSE
WELL PUMP
WASTE WATER
CAUSTIC TANK
SOAP TANK
CAUSTIC TANK
FLASH TANK
WATER TANK
COOLING FANS
MACHINE SHOP
CONC. PAD
SEED WAREHOUSE #2
SEED WAREHOUSE #1
LINTER STORAGE WAREHOUSE
CONC. PAD
PARTS STORAGE/ OFFICE
TRUCK LOADING SHED
TRUCK LOADOUT TANKS
MEAL WAREHOUSE #7
PIPE TRESTLE
COOLING TOWER
SOLVENT PLANT
OIL TRAP
MEAL WAREHOUSE #8
RAMP
CONC. PAD
DELUGE PUMP HOUSE
235,000 GAL.
MAIN PUMP HOUSE
235,000 GAL.
WATER TANK
FIRE STOP
DRAINAGE TRAP
OPEN DITCH
OUTSIDE SEED STORAGE
STORAGE
SIDE DISCHARGE BINS
OUTSIDE HULL STORAGE
TO MAIN GATE
CHOWCHILLA MILL
PARTIAL SITE PLAN
CHOWCHILLA MILL
25184 RD. 16
CHOWCHILLA, CA
Anderson Clayton
M-7002


ANDERSON CLAYTON
OILSEED
COTTON SEED VIA TRUCK (GRAVITY UNLOAD)
SEED RECEIVING PIT
AUGER
SEED STORAGE SHED
CONVEY-OR BELT
(2) CYC-LONES 32" 20-2D
(6) SEED CLEANERS
TRASH BIN
C-41-4
C-41-6
2 FANS
(4) CYC-LONES 42" 20-2D
(2) FIRST CUT BEATERS
(1) CYC-LONE 28" 20-2D
FIRST CUT BAILER
SHIPPING
MOTES
(14) FIRST CUT LINTNERS
C-41-5
SEED
LINT
HULLS & DIRT
MEAT
STEAM
ORGANICS
EMISSIONS
(8) CYC-LONES 42" 20-2D
(1) CYC-LONE 18" 1D-3D
(1) CYC-LONES 28" 2D-2D & 1D-3D
(4) 2ND CUT BEATERS
(2) CYC-LONE 28" 2D-2D & 1D-3D
2ND CUT BAILER
SHIPPING
(40) 2ND CUT LINTNERS
900CFM
C-41-7
C-41-10
C-41-15 And C-41-16
SINGLE DOOR MEAL STORAGE AND LOADING
SHIPPING
HARD CAKE
DOUBLE DOOR MEAL STORAGE AND LOADING
SHIPPING
C-41-13
HEXANE STORAGE
C-41-11
OIL EXTRACTION & SOLVENT RECOVERY
C-41-9
SOFT CAKE
SEEDS
15TONS/HR. 360TONS/DAY
C-41-14
HULLS
9400 CFM
KICE CYC-LONE
KICE CYC-LONE
TRASH
(3) DOUBLE DRUM BEATERS
KICE ASPIRATOR (CLEANER)
HULLS
(1) CYC-LONE 16" 2D-2D
HOPPER BOX
HULL ELEVATOR TO PILE
BLOWER 60H.P.
6" LINE 670CFM
STEAM
(6) PRE COOKERS
FILTER PRESS
CRUDE OIL STORAGE
MURRAY BOILER 10x10⁶BTU/HR. NATURAL GAS WITH OIL CAPACITY
C-41-12
C-41-19
(3) MEAT ROLLS
MIXER
MEAT BIN
MEATS
(5) HULLERS
& MISC.
3.3 TONS PER HR.
KICE ASPIRATOR
C-41-8

Attachment I

Permits to Operate for Equipment Remaining in Service at the Chowchilla Oil Mill

INSPECTION WORKSHEET

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
659 HP SEED RECEIVING OPERATION INCLUDING SEED RECEIVING PITS, STORAGE HOUSES AND PILES, AND RELATED CONVEYING EQUIPMENT.

CONDITIONS

1. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. 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]
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
5. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100]
6. The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081]
7. Records of daily cotton seed throughput shall be maintained, retained on the premises for at least two years and made available for District inspection upon request. [District Rule 1070]

INSPECTION WORKSHEET

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
815 HP MEAL LOADING AND STORAGE OPERATION NORTH, INCLUDING FLOOR SCREW CONVEYOR IN MEAL HOUSE WITH THREE DOORS, SERVED BY ONE 32" 1D-3D CYCLONE AND A BAGHOUSE DUST COLLECTOR (THE CYCLONE AND BAGHOUSE ALSO SERVE PTO #C-41-13-1).

CONDITIONS

1. {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]
2. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. The meal house doors shall remain closed during receiving or shipping of meal at the meal house. [District Rule 2201]
4. Throughput of meal shall not exceed 270 tons per day. [District Rule 2201]

CONDITIONS FOR PERMIT C-41-11-0

INSPECTION

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

WORKSHEET

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
30,000 GALLON CAPACITY ABOVEGROUND HEXANE STORAGE TANK.

CONDITIONS

1. {271} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
2. {234} The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081]
3. Records of daily amount of solvent (hexane) throughput shall be maintained, retained on the premises for at least two years and made available for District inspection upon request. [District Rule 1070]

INSPECTION WORKSHEET

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
101 HP MEAL LOADING AND STORAGE OPERATION SOUTH, INCLUDING FLOOR SCREW CONVEYOR IN MEAL HOUSE WITH DOUBLE DOORS, SERVED BY ONE 32" 1D-3D CYCLONE AND A BAGHOUSE DUST COLLECTOR (CYCLONE AND BAGHOUSE ALSO SERVE PTO #C-41-10-1).

CONDITIONS

1. {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]
2. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. The meal house doors shall be closed during recieving or shipping of meal at the meal house. [District Rule 2201]
4. Throughput of meal shall not exceed 275 tons per day. [District Rule 2201]

CONDITIONS FOR PERMIT C-41-14-0

INSPECTION WORKSHEET

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
60 HP HULL STORAGE PILE SERVED BY 1-20" 2D-2D CYCLONE.

CONDITIONS

1. {12} Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
2. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. {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]
4. {271} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
5. {234} The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081]
6. Records of daily seed throughput shall be maintained, retained for at least two years and made available for District inspection upon request. [District Rule 1070]

INSPECTION

EXPIRATION DATE: 07/31/2003

LEGAL OWNER OR OPERATOR: ANDERSON CLAYTON CORP/OIL MILL
MAILING ADDRESS: P.O. BOX 12506
FRESNO, CA 93778-2506

WORKSHEET

LOCATION: 25184 ROAD 16
CHOWCHILLA, CA 93610

EQUIPMENT DESCRIPTION:
208 HP DIESEL-FUELED CUMMINS ENGINE, WITH TURBOCHARGER AND AFTERCOOLER, POWERING AN EMERGENCY FIRE PROTECTION STANDBY PUMPING SYSTEM.

CONDITIONS

1. {271} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
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]
3. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. A daily log of operating hours shall be maintained on the premises, retained for at least two years, and made available to the District upon request. [District Rule 1070]
5. Particulate matter emission concentration shall not exceed 0.10 grains per standard dry cubic foot. [District Rule 4201]
6. The engine shall be operated only for maintenance testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance and testing purposes shall not exceed 200 hrs per year. [District Rule 2201 and 4701]
7. {310} The engine shall be equipped with a turbocharger and with an aftercooler or intercooler. [District NSR Rule]
8. {313} The sulfur content of the diesel fuel used shall not exceed 0.05% by weight. [District NSR Rule]
9. If engine operates with visible emissions greater than 1/2 Ringelmann or 10% opacity, compliance with particulate matter emissions shall be conducted by District-witnessed sample collection within 60 days of District determination. [District Rule 1081]
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
11. {309} The engine shall be equipped with a non-resettable elapsed-time meter indicating total hours of operation. [District NSR Rule]

55

San Joaquin Valley Unified Air Pollution Control District

RECEIVED
JAN 03 2001
PERMIT SERVICES
SJVUAPCD

APPLICATION FOR:

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

1. ERC TO BE ISSUED TO: **Anderson Clayton Corporation**

2. MAILING ADDRESS:
Street/P.O. Box: **P.O. Box 12506**
City: **Fresno** State: **CA** Zip Code: **93778-2506**

3. LOCATION OF REDUCTION: **Chowchilla Oil Mill (Facility #C-41)**
Street: **25184 Road 16**
City: **Chowchilla, CA 93610**

4. DATE OF REDUCTION: **July 17, 2000**

5. PERMIT NO(S): **C-41-5, -6-1, -7-0, -8-1, -9-1, -12-1, 15-0, -16-0, and -19-2** EXISTING ERC NO(S):

6. METHOD RESULTING IN EMISSION REDUCTION:
[X] SHUTDOWN [ ] RETROFIT [ ] PROCESS CHANGE [X] OTHER
DESCRIPTION:
Actual emission reductions (AERs) generated by the permanent shutdown of cotton seed oil and meal production equipment at the Chowchilla Oil Mill (facility ID #C-41). This is an originating ERC banking action. (Use additional sheets if necessary)

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

	VOC	NOx	CO	PM10	SOx	OTHER
1ST QUARTER	113,852	2,689	887	29,508	16	
2ND QUARTER	105,834	2,254	743	27,355	13	
3RD QUARTER	41,269	940	310	10,682	5	
4TH QUARTER	69,593	2,584	852	18,113	15	

8. SIGNATURE OF APPLICANT: [signature] TYPE OR PRINT TITLE OF APPLICANT: **Manager – Technical Services**

9. TYPE OR PRINT NAME OF APPLICANT: **Duncan McCook** DATE: 1/3/01 TELEPHONE NO: **Phone: (559) 446-6415 Fax: (559) 447-4425**

FOR APCD USE ONLY:

DATE STAMP: RECEIVED JAN 04 2001 FINANCE SJVUAPCD

FILING FEE RECEIVED: $ 650.00 Jr#121205
DATE PAID: PM 1-3-01
PROJECT NO.: C1010009 FACILITY ID.: C 41

PARSONS

Parsons Engineering Science, Inc. - A Unit of Parsons Infrastructure & Technology Group Inc.
2520 Pegasus Drive • Bakersfield, California 93308 • (661) 393-0272 • Fax: (661) 393-8306

Fax

To: Samir Sheikh From: John Gruber

Fax: (559) 230-6061 Pages: 2

Phone: (559) 230-5897 Date: 1/23/2001

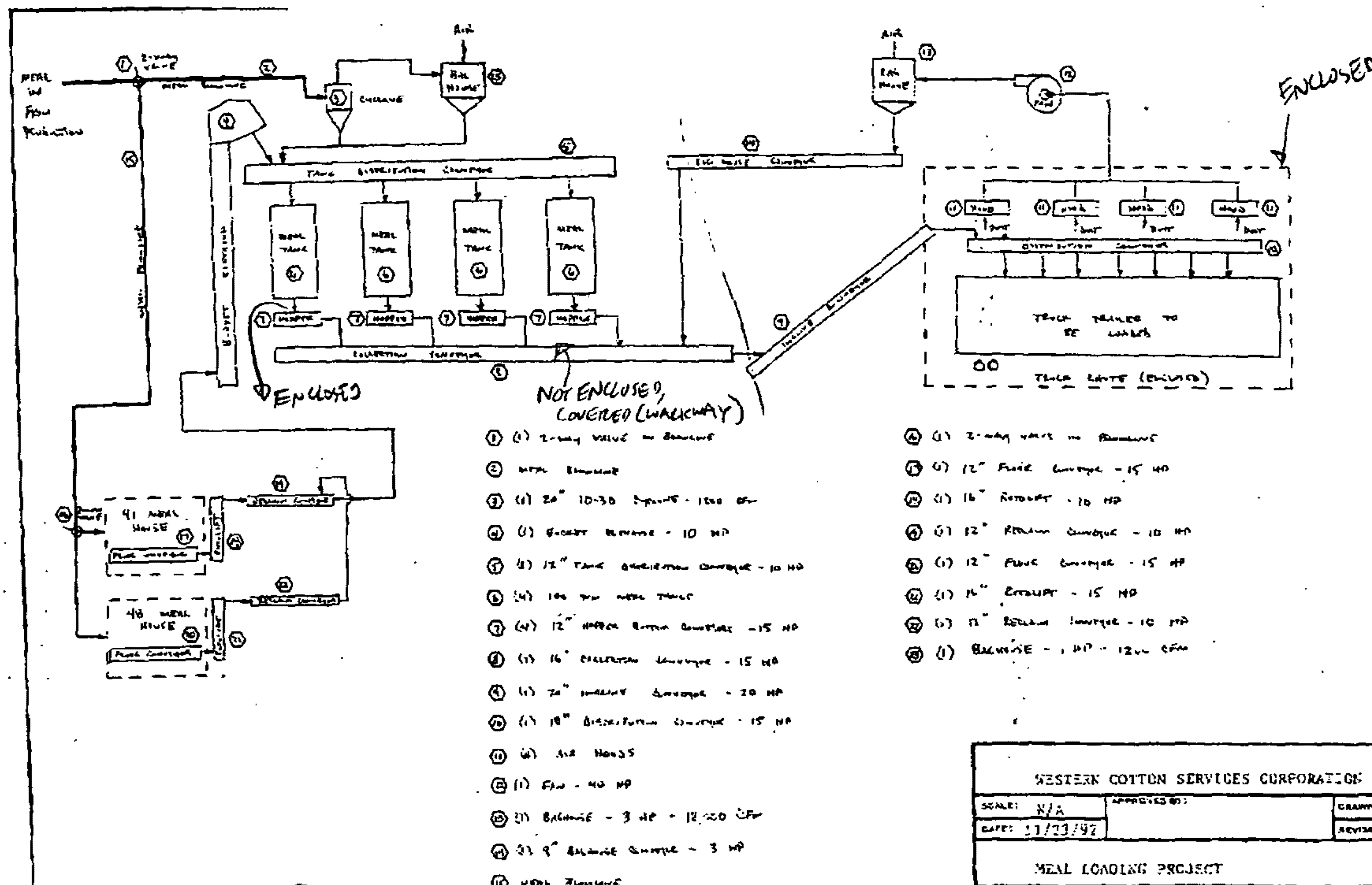
Re: Diagram CC:

☐ Urgent ☒ For Review ☐ Please Comment ☒ Please Reply ☐ Please Recycle

• Comments:

– COUNT RECEIVING | SHIPPING TWICE

–



WESTERN COTTON SERVICES CORPORATION

SCALE: N/A	APPROVED BY:	DRAWN BY
DATE: 11/23/97		REVISED

MEAL LOADING PROJECT

FLOWCHART

BC

RECEIVED

JAN 03 2001

PERMIT SERVICES
SJVUAPCD

Anderson Clayton Corp.

January 2, 2001

Mr. Jovencio Refuerzo
SJVUAPCD – Central Region
1990 East Gettysburg Avenue
Fresno, California 93726

Re: ERC Application for Anderson Clayton Corp.'s Chowchilla Oil Mill (#C-41)

Dear Mr. Refuerzo,

Please find enclosed a completed Emission reduction Credit Application for our Chowchilla Oil Mill Facility. These ERC's reflect the permanent closure of a portion of the permitted processes at this facility.

As we discussed earlier, our company has some time constraints due to our upcoming fiscal year end. For this reason, I would like to request that "Reimbursable Overtime" processing be used to expedite processing. If possible, we would like the ERC's to go to public notice as soon as possible.

Thank you in advance for your help with this matter. If you have any questions, please contact me at 559/446-6415.

Sincerely,

Duncan McCook
Manager – Technical Services

Enclosure

ANDERSON CLAYTON CORP.
P. O. BOX 12506 • FRESNO, CALIFORNIA 93778-2506
PHONE (559) 447-1390 • FAX (559) 447-4400

San Joaquin Valley Unified Air Pollution Control District

RECEIVED
JAN 03 2001
PERMIT SERVICES
SJVUAPCD

APPLICATION FOR:

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

1. ERC TO BE ISSUED TO: **Anderson Clayton Corporation**

2. MAILING ADDRESS:
Street/P.O. Box: **P.O. Box 12506**
City: **Fresno** State: **CA** Zip Code: **93778-2506**

3. LOCATION OF REDUCTION: **Chowchilla Oil Mill (Facility #C-41)**
Street: **25184 Road 16**
City: **Chowchilla, CA 93610**

4. DATE OF REDUCTION: **July 17, 2000**

5. PERMIT NO(S): **C-41-5, -6-1, -7-0, -8-1, -9-1, -12-1, 15-0, -16-0, and –19-2** EXISTING ERC NO(S):

6. METHOD RESULTING IN EMISSION REDUCTION:
[X] SHUTDOWN [ ] RETROFIT [ ] PROCESS CHANGE [X] OTHER
DESCRIPTION:
Actual emission reductions (AERs) generated by the permanent shutdown of cotton seed oil and meal production equipment at the Chowchilla Oil Mill (facility ID #C-41). This is an originating ERC banking action. (Use additional sheets if necessary)

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

	VOC	NOx	CO	PM10	SOx	OTHER
1ST QUARTER	113,852	2,689	887	29,508	16	
2ND QUARTER	105,834	2,254	743	27,355	13	
3RD QUARTER	41,269	940	310	10,682	5	
4TH QUARTER	69,593	2,584	852	18,113	15	

8. SIGNATURE OF APPLICANT: [signature]
TYPE OR PRINT TITLE OF APPLICANT: **Manager – Technical Services**

9. TYPE OR PRINT NAME OF APPLICANT: **Duncan McCook**
DATE: 1/3/01
TELEPHONE NO: **Phone: (559) 446-6415 Fax: (559) 447-4425**

FOR APCD USE ONLY:

DATE STAMP

FILING FEE RECEIVED: $ 650.00 ck # 121205
DATE PAID: 1/3/01
PROJECT NO.: C1010009 FACILITY ID.: C 41

BC

Anderson Clayton Corp.
California Account
P.O. BOX 12506 FRESNO, CALIFORNIA 93778-2506

121205
INVOICE AMOUNT AFTER DISCOUNT

VENDOR NO.	INVOICE NO.		
		ERC Application fee	650.00
		TOTAL	650.00

Anderson Clayton Corp.
California Account
P.O. BOX 12506 FRESNO, CALIFORNIA 93778-2506

70-2328
0719

121205

CHECK DATE

January 3, 2001

CHECK AMOUNT

PAY $ ***650.00***

TO THE ORDER OF SJVUAPCD

The sum of 650dal's00cts

Anderson Clayton Corp.

BY

BY

Bank of America
Commercial Disbursement Acct.
Northbrook, IL

⑈121205⑈ ⑆071923284⑆ 87659⑈01143⑈

San Joaquin Valley Unified APCD
Permit Services Division
Applications for Authority to Construct or Emission Reduction Credits
Breakdown of Processing Time

Company Name: ANDERSON CLAYTON CORPORATION

BC

Facility Id: C-41 Project Number: 1010009

Project Description: AER's FROM SHUTDOWN OF COTTON SEED OIL & MEAL PRODUCTION EQUIPMENT.

Code	Date	Time Spent	Initials
04	1/10/01	0.5	SQS
ROT	1/15/01	6.0	SQS
06, 11	1/16/01	1.8	SQS
ROT	1/20/01	8.0	SQS
06, 11	1/23/01	1.5	SQS
06, 11, 18	1/24/01	3.0	SQS
19			
20	3/8/01	1.5	SQS
TOTAL			

Activity Code List

- 01- Pre-Application Meeting (phone)
- 02- Pre-Application Meeting (in person)
- 03- Application Log-in
- 04- Preliminary Review
- 05- Defficiency Letter
- 06- Verbal/telephone request for information
- 07- Billing
- 08- Completeness Letter
- 09- Post Application Meetings
- 10- BACT Determination
- 11- Emissions Calculations
- 12- Compliance Determination
- 13- Project Description, Flow Digram, Equipment Listing
- 14- Risk Assessment
- 15- CEQA Review
- 16- Draft Conditions
- 17- Prepare ATC
- 18- Prepare ERC
- 19- Prepare Preliminary Notice
- 20- Prepare Final Notice
- 99- Reworking of Engineering Evaluation

TOTAL BILLING HOURS	28
TOTAL BILLING HOURS	14.0

PUBLIC NOTICE

ROT

TABLE 6.4-6. TOTAL PARTICULATE EMISSION FACTORS FOR UNCONTROLLED GRAIN PROCESSING OPERATIONS[a]

EMISSION FACTOR RATING: D

Type of Operation	Emission factor	
	kg/Mg	lb/ton
Feed mills		
Receiving	1.3	2.5
Shipping	0.5	1.0
Handling	2.7	5.5
Grinding		
Hammermilling[b]	0.1[c,d]	0.2[c,d]
Flaking[b]	0.1[c]	0.2[d]
Cracking[b]	0.01[c,d]	0.02[c,d]
Pellet cooler[b]	0.2[c]	0.4[c]
Carob kibble roasting	3.0	6.0
Wheat milling		
Receiving	0.5	1.0
Precleaning and handling	2.5	5.0
Cleaning house	-	-
Mill house	35.0	70.0
Durum milling		
Receiving	0.5	1.0
Precleaning and handling	2.5	5.0
Cleaning house	-	-
Mill house	-	-
Rye milling		
Receiving	0.5	1.0
Precleaning and handling	2.5	5.0
Cleaning house	-	-
Mill house	35.0	70.0
Oat milling[e]	1.25	2.5
Rice milling		
Receiving	0.32	0.64
Precleaning and handling	2.5	5.0
Drying[f]	0.15	0.30
Cleaning and mill house	-	-

TABLE 6.4-6 (concluded).

Type of Operation	Emission factor	
	kg/Mg	lb/ton
Soybean milling		
Receiving	0.8	1.6
Handling	2.5	5.0
Cleaning	-	-
Drying[g]	3.6	7.2
Cracking and dehulling	1.7	3.3
Hull grinding	1.0	2.0
Bean conditioning	0.05	0.1
Flaking	0.29	0.57
Meal dryer	0.75	1.5
Meal cooler	0.9	1.8
Bulk loading	0.14	0.27
Dry corn milling		
Receiving	0.5	1.0
Drying[g]	0.25	0.5
Precleaning and handling	2.5	5.0
Cleaning house	3.0	6.0
Degerming and milling	-	-
Wet corn milling		
Receiving	0.5	1.0
Handling	2.5	5.0
Cleaning	3.0	6.0
Drying[h]	0.24	0.48
Bulk loading	-	-

[a]Most emission factors are expressed as weight of dust emitted/unit weight of grain entering the plant, not necessarily the same as amount of material processed by each operation. Dash = no data.
[b]Expressed as weight of dust emitted/unit weight of grain processed.
[c]With cyclones.
[d]Measured on corn processing operations at feed mills.
[e]Represents several sources at one plant, some controlled with cyclones and others with fabric filters.
[f]Average for uncontrolled column dryers; see Table 6.4-2.
[g]Dryer types unknown.
[h]For rotary steam tube dryers.

6.4 GRAIN ELEVATORS AND PROCESSING PLANTS

6.4.1 General[1-3]

Grain elevators are facilities at which grains are received, stored, and then distributed for direct use, process manufacturing, or export. They can be classified as either "country" or "terminal" elevators, with terminal elevators further categorized as inland or export (marine) types. Operations other than storage often are performed at elevators, such as cleaning, drying and blending. The principal grains handled include wheat, milo, corn, oats, rice and soybeans.

Country elevators are generally smaller elevators that receive grain by truck directly from farms during the harvest season. These elevators sometimes clean or dry grain before it is transported to terminal elevators or processors. Terminal elevators dry, clean, blend and store grain for shipment to other terminals or processors, or for export. These elevators may receive grain by truck, rail or barge, and they have significantly greater grain handling and storage capacities than do country elevators. Export elevators are terminal elevators that load grain primarily onto ships for export.

The first step at a grain elevator is the unloading of the incoming truck, railcar or barge. A truck discharges its grain into a hopper, usually below grade, from which the grain is conveyed to the main part of the elevator. Barges are unloaded by a bucket elevator (marine leg) that is extended down into the hold. The main building at an elevator, where grain is elevated and distributed, is called the "headhouse". In the headhouse, grain is lifted on one of the elevator legs and discharged onto the gallery belt, which conveys the grain to the storage bins, or silos. A "tripper" diverts grain into the desired bin. Grain is often cleaned and/or dried before storage. When ready for shipping, grain is discharged from bins onto the tunnel belt below, which conveys it to the scale garner and on to the desired loadout location. Figure 6.4-1 illustrates the basic elements of an export terminal elevator.

A grain processing plant (mill) receives grain from an elevator and performs various manufacturing steps that produce a finished food product. Examples of these plants are flour mills, animal feed mills, and producers of edible oils, starch, corn syrup, and cereal products. The elevator operations of unloading, conveying and storing also are performed at mills.

6.4.2 Emissions And Controls[1]

The only pollutant emitted in significant quantities from grain elevators and processing operations is particulate matter. Small amounts of combustion products from natural gas fired grain dryers also may be emitted. Grain elevators and grain processing operations can be considered separate categories of the industry when considering emissions.

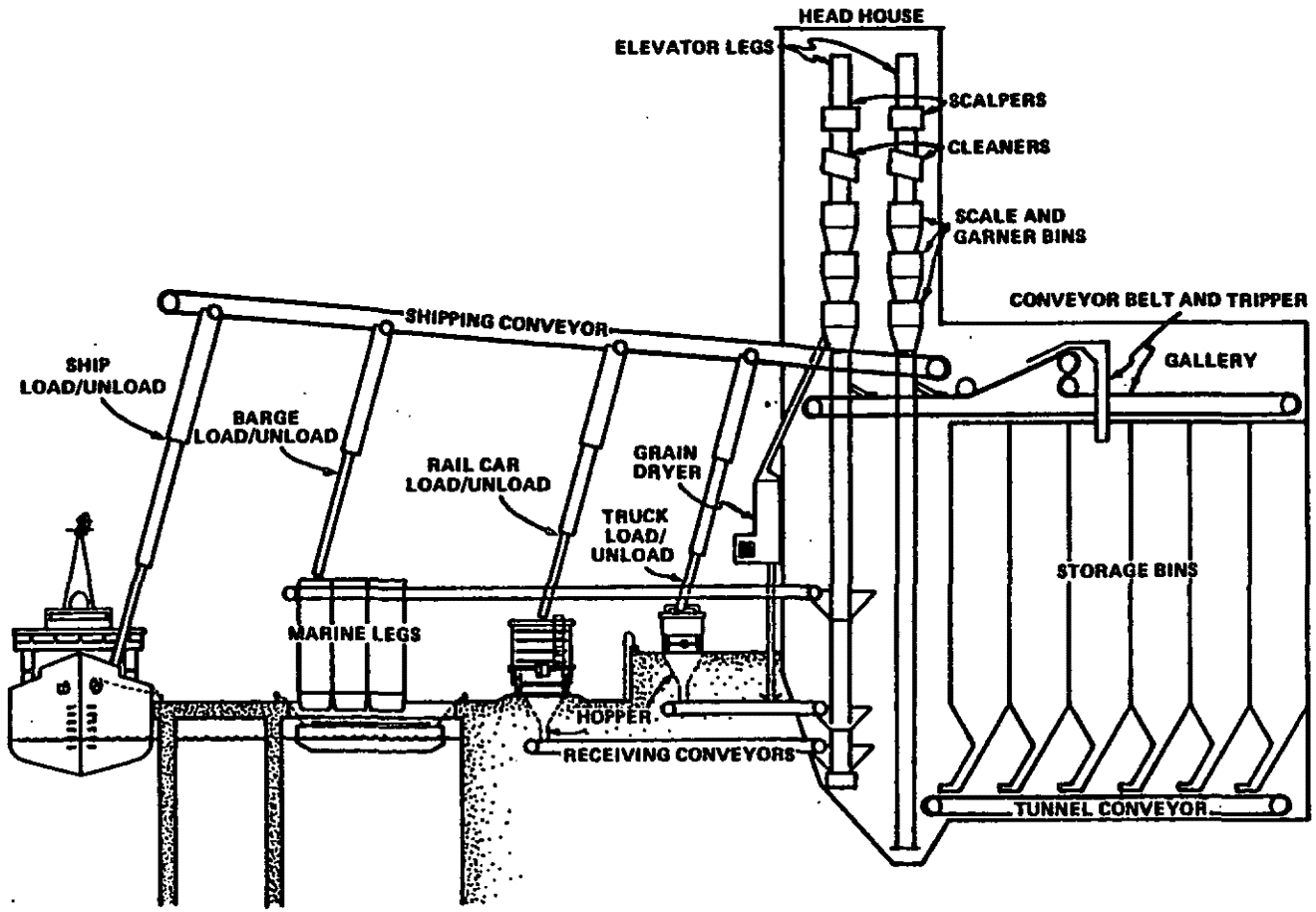


Figure 6.4-1. Typical export terminal grain elevator.

6.4.2.1 Grain Elevators - Emissions of fugitive dust occur whenever quantities of grain are set into motion during loading, conveying, transfer, drying or cleaning operations at a grain elevator. The emission rate can be affected by the quantity of foreign material in the grain (dirt, seeds, sticks, stones, etc., known as "dockage") and by the type of grain. While it is difficult to quantify the effect of dockage, observations indicate that soybeans, oats and sorghum are usually very dusty, whereas wheat and corn are comparatively clean.[4] Total particulate emission factors for the principal operations at grain elevators are presented in Table 6.4-1. Since data differentiating these emission factors by grain type are sparse, all of these factors are approximate average values intended to apply to a variety of grains. Tables 6.4-2, 6.4-3 and 6.4-4, and Figures 6.4-2, 6.4-3 and 6.4-4, show particle size distributions and size specific emission factors for three operations at grain elevators.

The emission factors in Table 6.4-1 represent the amount of dust generated per unit weight of grain processed through each uncontrolled operation. Since the amount of grain passing through each individual operation is often difficult to determine, it is sometimes convenient to express the emission factors in terms of the quantity of grain received or shipped by the elevator. (It is assumed that the amounts shipped and received are equal over the long run.) Therefore, the factors in Table 6.4-1 have been modified and are expressed in Table 6.4-5 as a function of the amount of grain received or shipped. The ratios shown in Table 6.4-5 are approximate values based on averages for bin turning, cleaning and drying in each elevator category. However, because operating practices at individual elevators are different, these ratios, like the emission factors themselves, may lack precision when applied to an individual elevator.

The factors in Tables 6.4-1 and 6.4-5 should not be added together in order to obtain a single overall emission factor for a grain elevator because, in most elevators, the emissions from some operations are controlled and others are not. Therefore, emissions estimations generally should be undertaken for each operation and its associated control device.

Several methods are available to reduce or control dust emissions at grain elevators. Since most emissions are generated when air passes swiftly through a mass of grain, measures that slow down grain transfer (conveying) rates or that reduce free fall distances will reduce emissions. Bulk grain, especially when falling through the air, should be protected from significant air currents or wind sources. Many operations at elevators are partially or totally enclosed (e. g., screw conveyors, drag conveyors, elevator legs) to isolate generated dust from the atmosphere. Hooding in the vicinity of some operations (e. g., grain unloading, conveyor transfer points) collects generated dust by creating a negative pressure area (through suction, or air aspiration) near the center of activity and then ducting the dusty air to a control device. Recent developments in the control of ship and barge loading operations include the use of "dead boxes" and tent controls. The dead box is a baffled attachment on the loading spout that serves to reduce the speed of the falling grain before it reaches the open air and strikes the grain pile. Aspiration to a control device often accompanies the use of the dead box. Large flexible covers connected to the loading spout and aspiration ducting, called tents, are used to cover the holds of ships during most of a loading operation. The tent must be removed during topping off (usually

TABLE 6.4-1. TOTAL PARTICULATE EMISSION FACTORS FOR UNCONTROLLED GRAIN ELEVATORS[a]

EMISSION FACTOR RATING: B

Type of Operation	Total particulate	
	kg/Mg	lb/ton
Country elevators		
Unloading (receiving)	0.3	0.6
Loading (shipping)	0.2	0.3
Removal from bins (tunnel belt)	0.5	1.0
Drying[b]	0.4	0.7
Cleaning[c]	1.5	3.0
Headhouse (legs)	0.8	1.5
Inland terminal elevators		
Unloading (receiving)	0.5	1.0
Loading (shipping)	0.2	0.3
Removal from bins (tunnel belt)	0.7	1.4
Drying[b]	0.6	1.1
Cleaning[c]	1.5	3.0
Headhouse (legs)	0.8	1.5
Tripper (gallery belt)	0.5	1.0
Export elevators		
Unloading (receiving)	0.5	1.0
Loading (shipping)	0.5	1.0
Removal from bins (tunnel belt)	0.7	1.4
Drying[b]	0.5	1.1
Cleaning[c]	1.5	3.0
Headhouse (legs)	0.8	1.5
Tripper (gallery belt)	0.5	1.0

[a]Expressed as weight of dust emitted/unit weight of grain handled by each operation. For inland terminal and export elevators, Reference 5; for drying, References 2, 6; for country elevators, Reference 5 and additional test data in References 7-10.

[b]References 6, 11. Based on 0.9 kg/Mg for uncontrolled rack dryers and 0.15 kg/Mg for uncontrolled column dryers, prorated on the basis of the distribution of these two types of dryers.

[c]Reference 11. Average of values, from < 0.3 kg/Mg for wheat to 3.0 kg/Mg for corn.

TABLE 6.4-2. PARTICLE SIZE DISTRIBUTION AND EMISSION FACTORS FOR UNCONTROLLED RICE DRYERS[a]

EMISSION FACTOR RATING: D

Aerodynamic particle diameter (um)	Cumulative weight % ≤ stated size	Emission factor[b] (kg/Mg)
2.5	0.8	0.0012
6.0	2.6	0.0039
10.0	7.7	0.012
15.0	24.5	0.037
Total particulate		0.15[c]

[a]References 1, 12.
[b]Expressed as cumulative weight of particulate ≤ corresponding particle size/unit weight of rice dried.
[c]Reference 11.

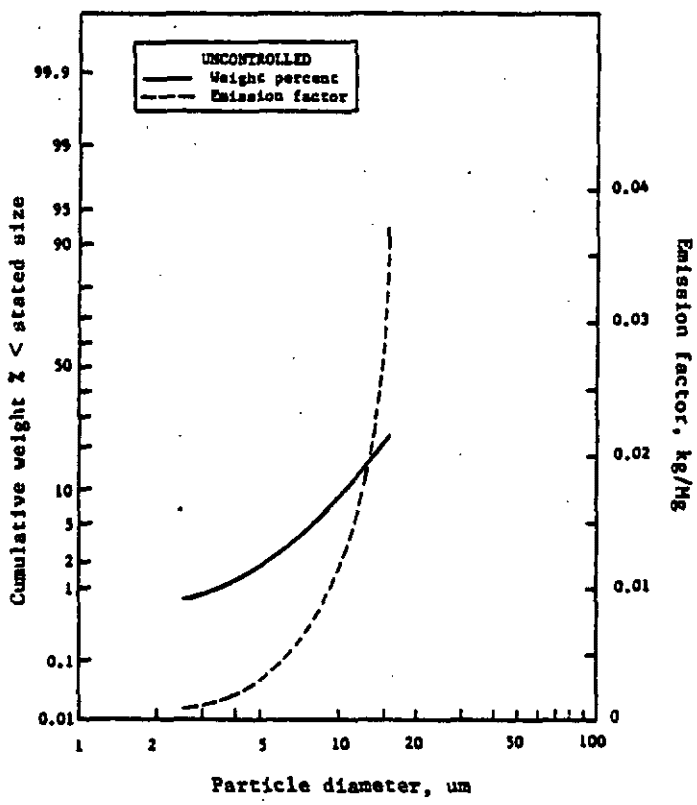


Figure 6.4-2. Cumulative size distribution and emission factors for uncontrolled rice dryers.

TABLE 6.4-3. PARTICLE SIZE DISTRIBUTION AND EMISSION FACTORS FOR CONTROLLED BARGE UNLOADING/CONVEYING[a]

EMISSION FACTOR RATING: D

Aerodynamic particle diameter (um)	Cumulative weight % ≤ stated size	Emission factor[b] (kg/Mg)
2.5	4.0	0.00013
6.0	11.0	0.00037
10.0	18.0	0.00054
Total particulate		0.003[c]

[a]Reference 13. Control is by fabric filter.
[b]Expressed as cumulative weight of particulate ≤ corresponding particle size/unit weight of grain unloaded/conveyed.
[c]Total mass emission factor is from Reference 1.

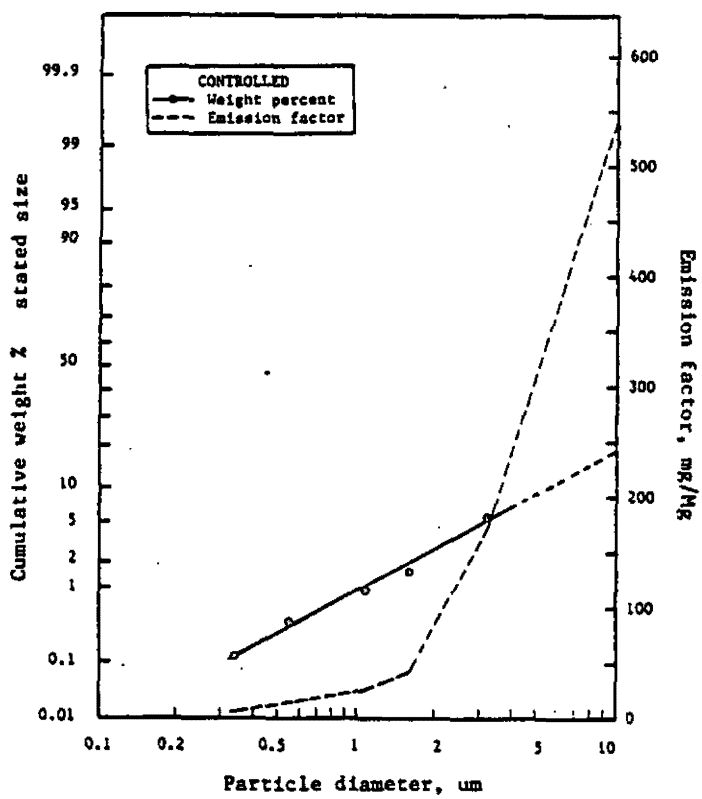


Figure 6.4-3. Cumulative size distribution and emission factors for controlled barge unloading/conveying.

TABLE 6.4-4. PARTICLE SIZE DISTRIBUTION AND EMISSION FACTORS FOR UNCONTROLLED SHIPLOADING[a]

EMISSION FACTOR RATING: C

Aerodynamic particle diameter (um)	Cumulative weight % ≤ stated size	Emission factor[b] (kg/Mg)
2.5	10.4	0.05
6.0	27.0	0.13
10.0	42.0	0.21
15.0	53.0	0.26
Total particulate		0.50[c]

[a]References 1, 14-15.
[b]Expressed as cumulative weight of particulate ≤ corresponding particle size/unit weight of grain loaded onto ships.
[c]Reference 11.

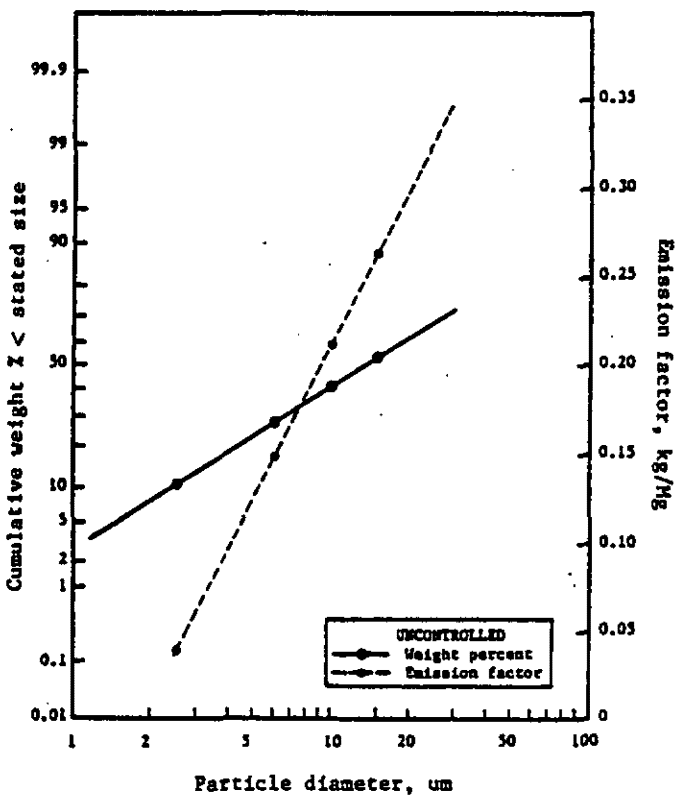


Figure 6.4-4. Cumulative size distribution and emission factors for uncontrolled shiploading.

TABLE 6.4-5. TOTAL PARTICULATE EMISSION FACTORS FOR GRAIN ELEVATORS, BASED ON AMOUNT OF GRAIN RECEIVED OR SHIPPED[a]

EMISSION FACTOR RATING: C

Type of Operation	Emission factor, kg/Mg handled[b]	x	Typical ratio of grain processed to grain received or shipped[c]	=	Emission factor, kg/Mg received or shipped
Country elevators					
Unloading (receiving)	0.3		1.0		0.3
Loading (shipping)	0.2		1.0		0.2
Removal from bins (tunnel belt)	0.5		2.1		1.0
Drying[d]	0.4		0.3		0.1
Cleaning[e]	1.5		0.1		0.2
Headhouse (legs)	0.8		3.1		2.5
Inland terminal elevators					
Unloading (receiving)	0.5		1.0		0.5
Loading (shipping)	0.2		1.0		0.2
Removal from bins (tunnel belt)	0.7		2.0		1.4
Drying[d]	0.6		0.1		0.1
Cleaning[e]	1.5		0.2		0.3
Headhouse (legs)	0.8		3.0		2.3
Tripper (gallery belt)	0.5		1.7		0.8
Export elevators					
Unloading (receiving)	0.5		1.0		0.5
Loading (shipping)	0.5		1.0		0.5
Removal from bins (tunnel belt)	0.7		1.2		0.8
Drying[d]	0.5		0.01		0.01
Cleaning[e]	1.5		0.2		0.3
Headhouse (legs)	0.8		2.2		1.7
Tripper (gallery belt)	0.5		1.1		0.6

[a]Assumes amount received is approximately equal to the amount shipped.
[b]To obtain units of lb/ton, multiply factors by 2.0.
[c]Reference 6. Average values from a survey of elevators across the U. S. Can be considerably different for any individual elevator or group of elevators in the same locale.
[d]See Note b in Table 6.4-1.
[e]See Note c in Table 6.4-1.

about 25 percent of the total loading), allowing essentially uncontrolled emissions to escape.

Most elevators utilize particulate control devices on at least some of their operations. The traditional form of control at elevators has been mechanical collectors, or cyclones. Cyclones collect particles larger than about 10 microns with only 85 to 95 percent control efficiency, often producing visible emissions. Hence, fabric filters are usually selected in areas having more stringent control requirements. Typical efficiencies for well operated fabric filters exceed 99 percent, with no visible emissions. The air aspirated from enclosed equipment and hoods is ducted to a fabric filter or, in some cases, one or more cyclones. Rarely are other particulate control devices, such as wet scrubbers and electrostatic precipitators, applied at elevators. Grain dryers present a different sort of control problem because of the large volumes of warm, moist air exhausted. Most dryers are enclosed with a continuously vacuumed polyester or stainless steel screening to collect particulate, with the vacuum usually discharged to a cyclone. Two principal dryer configurations, rack and column, are in use. The majority of dryers manufactured today are of the column type, which has considerably lower emissions than the rack type.[16]

6.4.2.2 Grain Processing Plants - Several grain milling operations, such as receiving, conveying, cleaning and drying, are similar to those at grain elevators. In addition to these, breaking down (milling) the grain or grain by-products for processing through various types of grinding operations is a further source of emissions. The hammermill is the most widely used grinding device at feed mills. Product is recovered from the hammermill with a cyclone collector, which can be a major source of dust emissions. Again, like elevators, mills use a combination of cyclones and fabric filters to conserve product and to control emissions. Drying at a grain mill is accomplished using several types of dryers, including fluidized bed dryers (soybean processing) and flash fired or direct fired dryers (corn milling). These newer dryer types might have lower emissions than the traditional rack or column dryers, but data are insufficient at this time to quantify the difference. The grain pre-cleaning often performed before drying also likely serves to reduce emissions. Emission factors for various grain milling and other processing operations are presented in Table 6.4-6, and the particle size distribution and size specific emission factor for a roaster operation are shown in Table 6.4-7 and Figure 6.4-5. The origins of these emission factors are discussed below.

Emission factor data for feed mill operations are sparse. The factors for receiving, shipping and handling are based on estimates made by experts within the feed industry.[17] The remaining feed mill factors are based on test data in References 2, 18 and 19.

The roasting of carob kibble (or pods), which are ground and used as a chocolate substitute, is similar to coffee roasting. The emission factor and particle size distribution for this operation were derived from References 20 and 21.

Three emission areas for wheat mill processing operations are grain receiving and handling, cleaning house and milling operations. Data from Reference 5 were used to estimate emission factors for grain receiving and

TABLE 6.4-6. TOTAL PARTICULATE EMISSION FACTORS FOR UNCONTROLLED GRAIN PROCESSING OPERATIONS[a]

EMISSION FACTOR RATING: D

Type of Operation	Emission factor	
	kg/Mg	lb/ton
Feed mills		
Receiving	1.3	2.5
Shipping	0.5	1.0
Handling	2.7	5.5
Grinding		
Hammermilling[b]	0.1[c,d]	0.2[c,d]
Flaking[b]	0.1[c]	0.2[d]
Cracking[b]	0.01[c,d]	0.02[c,d]
Pellet cooler[b]	0.2[c]	0.4[c]
Carob kibble roasting	3.0	6.0
Wheat milling		
Receiving	0.5	1.0
Precleaning and handling	2.5	5.0
Cleaning house	-	-
Mill house	35.0	70.0
Durum milling		
Receiving	0.5	1.0
Precleaning and handling	2.5	5.0
Cleaning house	-	-
Mill house	-	-
Rye milling		
Receiving	0.5	1.0
Precleaning and handling	2.5	5.0
Cleaning house	-	-
Mill house	35.0	70.0
Oat milling[e]	1.25	2.5
Rice milling		
Receiving	0.32	0.64
Precleaning and handling	2.5	5.0
Drying[f]	0.15	0.30
Cleaning and mill house	-	-

TABLE 6.4-6 (concluded).

Type of Operation	Emission factor	
	kg/Mg	lb/ton
Soybean milling		
Receiving	0.8	1.6
Handling	2.5	5.0
Cleaning	-	-
Drying[g]	3.6	7.2
Cracking and dehulling	1.7	3.3
Hull grinding	1.0	2.0
Bean conditioning	0.05	0.1
Flaking	0.29	0.57
Meal dryer	0.75	1.5
Meal cooler	0.9	1.8
Bulk loading	0.14	0.27
Dry corn milling		
Receiving	0.5	1.0
Drying[g]	0.25	0.5
Precleaning and handling	2.5	5.0
Cleaning house	3.0	6.0
Degerming and milling	-	-
Wet corn milling		
Receiving	0.5	1.0
Handling	2.5	5.0
Cleaning	3.0	6.0
Drying[h]	0.24	0.48
Bulk loading	-	-

[a]Most emission factors are expressed as weight of dust emitted/unit weight of grain entering the plant, not necessarily the same as amount of material processed by each operation. Dash = no data.
[b]Expressed as weight of dust emitted/unit weight of grain processed.
[c]With cyclones.
[d]Measured on corn processing operations at feed mills.
[e]Represents several sources at one plant, some controlled with cyclones and others with fabric filters.
[f]Average for uncontrolled column dryers; see Table 6.4-2.
[g]Dryer types unknown.
[h]For rotary steam tube dryers.

TABLE 6.4-7. PARTICLE SIZE DISTRIBUTION AND EMISSION FACTORS FOR UNCONTROLLED CAROB KIBBLE ROASTERS[a]

EMISSION FACTOR RATING: E

Aerodynamic particle diameter (um)	Cumulative weight % ≤ stated size	Emission factor[b] (kg/Mg)
2.5	0.6	0.018
6.0	0.7	0.021
10.0	2.0	0.060
15.0	11.5	0.35
Total particulate		3.0[c]

[a]Reference 18.
[b]Expressed as cumulative weight of particulate ≤ corresponding particle size/unit weight of carob kibble roasted.
[c]Reference 21.

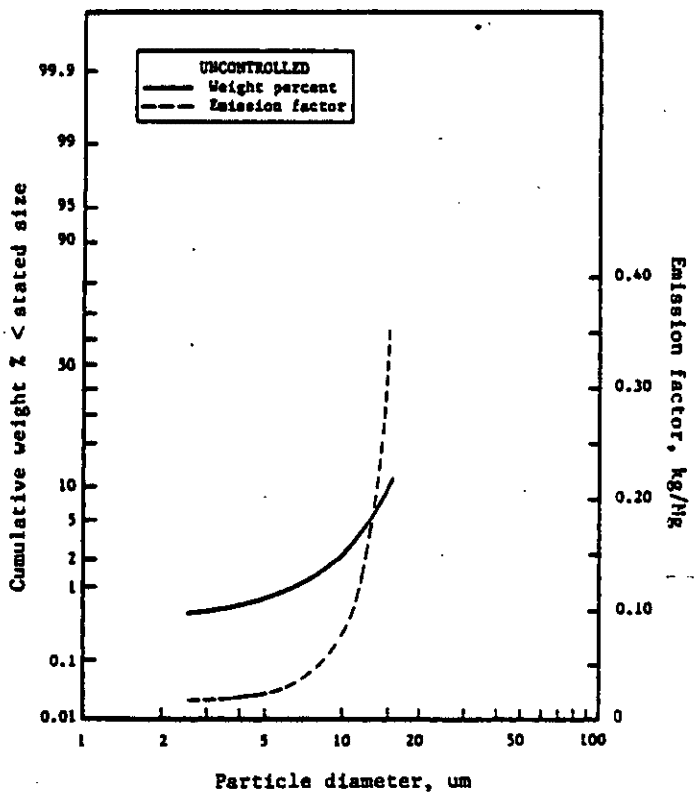


Figure 6.4-5. Cumulative size distribution and emission factors for uncontrolled carob kibble roasters.

handling. Data for the cleaning house are insufficient to estimate an emission factor, and information contained in Reference 2 was used to estimate the emission factor for milling operations. The large emission factor for the milling operation applies to uncontrolled operations. Almost all of the sources involved, however, are equipped with control devices to prevent product losses. Fabric filters are widely used for this purpose.

Durum and rye milling operations are similar to those for wheat milling. Therefore, most of these emission factors are assumed equal to those for wheat mill operations.

The grain unloading, handling and cleaning operations for dry corn milling are similar to those in other grain mills, but the subsequent operations are somewhat different. Also, some drying of corn received at the mill may be necessary before storage. An estimate of the emission factor for drying was obtained from Reference 2. Insufficient information is available to estimate emission factors for degerming and milling.

Information necessary to estimate emissions from oat milling is unavailable, and no emission factors for other grains are considered applicable because oats are reported to be dustier than many other grains. The only emission factor data available are for controlled emissions.

Emission factors for rice milling are based on those for similar operations in other grain handling facilities. Insufficient information is available to estimate emission factors for drying, cleaning and mill house operations.

Information contained in Reference 2 is used to estimate emission factors for soybean mills.

Emissions information on wet corn milling is generally unavailable, in part because of the wide variety of products and the diversity of operations. Receiving, handling and cleaning operations emission factors are assumed to be similar to those for dry corn milling. The drying emission factor is from tests at a wet corn milling plant producing animal feed.[22]

Due to operational similarities between grain milling and processing plants and grain elevators, the control methods used are similar. Both often use cyclones or fabric filters to control emissions from the grain handling operations (e.g., unloading, legs, cleaners, etc.). These same devices are also often used to control emissions from other processing operations. A good example of this is the extensive use of fabric filters in flour mills. However, there are also certain operations within some milling operations that are not amenable to the use of these devices. Therefore, wet scrubbers have found some application, particularly where the effluent gas stream has a high moisture content. Certain other operations have been found to be especially difficult to control, such as rotary dryers in wet corn mills. The various emission control systems that have been applied to operations within the grain milling and processing industry are described in Reference 2.

References for Section 6.4

1. G. A. LaFlam, Documentation for AP-42 Emission Factors: Section 6.4, Grain Elevators and Processing Plants, Pacific Environmental Services, Inc., Durham, NC, September 1987.

2. L. J. Shannon, et al., Emissions Control in the Grain and Feed Industry, Volume I - Engineering and Cost Study, EPA-450/3-73-003a, U. S. Environmental Protection Agency, Research Triangle Park, NC, December 1973.

3. The Storage and Handling of Grain, PEI, Inc., Cincinnati, OH, for U. S. EPA Region V, Contract No. 68-02-1355, March 1974.

4. Technical Guidance for Control of Industrial Process Fugitive Particulate Emissions, PEI, Inc., for U. S. Environmental Protection Agency, Research Triangle Park, NC, Contract No. 68-02-1375, March 1977.

5. P. G. Gorman, Potential Dust Emission from a Grain Elevator in Kansas City, Missouri, MRI for U. S. Environmental Protection Agency, Research Triangle Park, NC, Contract No. 68-02-0228, May 1974.

6. L. J. Shannon, et al., Emission Control in the Grain and Feed Industry, Volume II - Emission Inventory, EPA-450/3-73-003b, MRI for U. S. Environmental Protection Agency, Research Triangle Park, NC, September 1974.

7. W. H. Maxwell, Stationary Source Testing of a Country Grain Elevator at Overbrook, Kansas, MRI for U. S. Environmental Protection Agency, Research Triangle Park, NC, Contract No. 68-02-1403, February 1976.

8. W. H. Maxwell, Stationary Source Testing of a Country Grain Elevator at Great Bend, Kansas, MRI for U. S. Environmental Protection Agency, Research Triangle Park, NC, Contract No. 68-02-1403, April 1976.

9. F. J. Belgea, Cyclone Emissions and Efficiency Evaluation, (Tests at elevators in Edinburg and Thompson, North Dakota), Pollution Curbs, Inc., St. Paul, MN, March 10, 1972.

10. F. J. Belgea, Grain Handling Dust Collection Systems Evaluation for Farmer's Elevator Company, Minot, North Dakota, Pollution Curbs, Inc., St. Paul, MN, August 28, 1972.

11. M. P. Schrag, et al., Source Test Evaluation for Feed and Grain Industry, EPA-450/3-76-043, U. S. Environmental Protection Agency, Research Triangle Park, NC, December 1976.

12. Emission test data from Environmental Assessment Data Systems, Fine Particle Emission Information System (FPEIS), Series No. 228, U. S. Environmental Protection Agency, Research Triangle Park, NC, June 1983.

13. Air Pollution Emission Test, Bunge Corporation, Destrehan, LA, EMB-74-GRN-7, U. S. Environmental Protection Agency, Research Triangle Park, NC, January 1974.

14. W. Battye and R. Hall, Particulate Emission Factors and Feasibility of Emission Controls for Shiploading Operations at Portland, Oregon Grain Terminals, Volume I, GCA Corporation, Bedford, MA, June 1979.

15. Emission Factor Development for Ship and Barge Loading of Grain, GCA Corporation for U. S. Environmental Protection Agency, Research Triangle Park, NC, Contract No. 68-02-3510, October 1984.

16. J. M. Appold, "Dust Control for Grain Dryers," in Dust Control for Grain Elevators, presented before the National Grain and Feed Association, St. Louis, MO, May 7-8, 1981.

17. Written communication from D. Bossman, American Feed Industry Association, Arlington, VA, to F. Noonan, U. S. Environmental Protection Agency, Research Triangle Park, NC, July 24, 1987.

18. Written communication from P. Luther, Purina Mills, Inc., St. Louis, MO, to G. LaFlam, PES, Inc., Durham, NC, March 11, 1987.

19. Written communication from P. Luther, Purina Mills, Inc., St. Louis, MO, to F. Noonan, U. S. Environmental Protection Agency, Research Triangle Park, NC, July 8, 1987.

20. Emission test data from FPEIS Series No. 229, U. S. Environmental Protection Agency, Research Triangle Park, NC, June 1983.

21. H. J. Taback, Fine Particle Emissions from Stationary and Miscellaneous Sources in the South Coast Air Basin, KVB, Inc., Tustin, CA, for the California Air Resources Board, February 1979.

22. Source Category Survey: Animal Feed Dryers, EPA-450/3-81-017, U. S. Environmental Protection Agency, Research Triangle Park, NC, December 1981.

PARSONS

Parsons Engineering Science, Inc. • A Unit of Parsons Infrastructure & Technology Group Inc.
2520 Pegasus Drive • Bakersfield, California 93308 • (661) 393-0272 • Fax: (661) 393-8306

BC

Fax

To: SAMIR Sheikh
From: John Gruber

Fax: (559) 230-6061
Pages: 2

Phone: (559) 230-5897
Date: 1/23/2001

Re: Monthly Fuel Usage
CC:

☐ Urgent ☒ For Review ☒ Please Comment ☐ Please Reply ☐ Please Recycle

• Comments:

CALCULATION OF AVERAGE QUARTERLY FUEL USE - BASELINE PERIOD 1996/1997

		January	February	March	April	May	June	July	August	September	October	November	December
Monthly Fuel Use (Therms/Month)	1996	96,812	70,248	99,436	104,620	95,980	97,189	100,755	29,069	79,144	113,924	111,494	116,296
	1997	108,212	111,045	111,848	118,092	83,385	1,532	0	0	0	25,047	103,256	104,091
Avg Monthly Fuel Use		102,512	90,647	105,642	111,356	89,683	49,361	50,378	14,535	39,572	69,486	107,375	110,194

	1st Quarter (Jan - March)	2nd Quarter (April - June)	3rd Quarter (July - Sept)	4th Quarter (Oct - Dec)
Avg Quarterly Fuel Use (Therms per Quarter)	298,801	250,399	104,484	287,054

BC

PROJECT ROUTING FORM

PROJECT NUMBER: 1010009 FACILITY ID: 41 PERMIT NOs: 41

APPLICANT NAME: ANDERSON CLAYTON CORPORATION

PREMISE ADDRESS: 25184 ROAD 17, CHOWCHILLA, CA 93610 (CHOWCHILLA OIL MILL)

PRELIMINARY REVIEW	ENGR	DATE	SUPR	DATE
A. Application Deemed Incomplete				
B. Application Deemed Complete [ ] Awaiting CB Offsets				
C. Application Pending Denial				
D. Application Denied				

ENGINEERING EVALUATION	INIT	DATE
E. Engineering Evaluation Complete		
F. Supervising Engineer Approval		
G. Compliance Division Approval [ ] Not Required		
H. Permit Services Manager Approval		

Director Review: [ ] Not Required [ ] Required

Prelims to SS
Finals to SS

CLERICAL STAFF: Perform tasks as indicated below. Initial and date when completed.

[ ] **PRELIMINARY REVIEW**

[ ] _____ Mail Incompleteness Letter to the Applicant.
[ ] _____ Mail Completeness Letter to the Applicant.
[ ] _____ Mail Intent to Deny Letter to the Applicant **(Certified Mail)**.
[ ] _____ Mail Denial Letter to the Applicant **(Certified Mail)**.

BC

[ ] **PROJECTS NOT REQUIRING PUBLIC NOTIFICATION**

[ ] PRELIMINARY DISPOSITION:
[ ] _____ Mail Imminent Denial Letter to the Applicant **(Certified Mail)**.

[ ] FINAL DISPOSITION:
[ ] _____ Mail ATC(s) to Distribution.
[ ] _____ Mail Denial Letter to the Applicant **(Certified Mail)**.

[ ] **PROJECTS REQUIRING PUBLIC NOTIFICATION**

[ ] PRELIMINARY DECISION:
[ ] _____ Deliver Ad to the Newspaper NOT LATER THAN _____
[ ] _____ Mail copies of Cover Letter and Engineering Evaluation to Distribution.

[ ] FINAL DECISION:
[ ] _____ Deliver Ad to the Newspaper NOT LATER THAN _____
[ ] _____ Mail copies of Cover Letter and ATC(s) to Distribution.
[ ] _____ Mail copies of Cover Letter to Distribution.

DISTRIBUTION

[ ] _____ APPLICANT
[ ] _____ ENGINEER
[ ] _____ COMPLIANCE
[ ] _____ PREMISE FILE

[ ] _____ EPA - 75 Hawthorne St., San Francisco, CA 94105 Attn: A-3-4
[ ] _____ ARB - Stationary Source Div. Chief, PO Box 2815, Sacramento, CA 95812
[ ] _____ SJVUAPCD - 1999 Tuolumne St., Fresno, CA 93721 Attn: Seyed Sadredin

[ ] _____ BLDG DEPT _____ [ ] _____ OTHER _____

[ ] _____ FIRE DEPT _____ [ ] _____ SCHOOL _____

RUSH

R.O. Project

FINAL

~~Return~~ Notice

letters dated ~~1/30/01~~

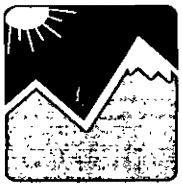
3/15/01

SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT
AVAILABLE EMISSION REDUCTION CREDITS BY SOURCE (lbs/qtr)
CENTRAL REGION

Report date: 03/13/01

Facility id: 41 Company Name: ANDERSON CLAYTON CORP/OIL MILL
Mailing address: P.O. BOX 12506
FRESNO, CA 93778-2506
Phone: (209) 446-6416

CERTIFICATE	POLLUTANT	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	Reduction Site
C-398-1	VOC	112,929	104,976	40,935	69,030	25184 ROAD 16, CHOWCHILLA, CA 93610
C-398-2	NOx	968	811	338	930	25184 ROAD 16, CHOWCHILLA, CA 93610
C-398-3	CO	887	743	310	852	25184 ROAD 16, CHOWCHILLA, CA 93610
C-398-4	PM10	27,222	25,285	9,864	16,707	25184 ROAD 16, CHOWCHILLA, CA 93610
C-398-5	SOx	16	13	5	15	25184 ROAD 16, CHOWCHILLA, CA 93610



San Joaquin Valley
Air Pollution Control District

Fax Transmittal

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

Date : May 02, 2001

To : JOS MARGOLIS **Fax Number :** 415-296-9582

From : JOVEN REFUERZO **Number of pages (including cover sheet):** 6

Description : COPIES OF ERCS C-398-1 THROUGH -5

[X]	Per Your Request	[X]	For Your Information
[X]	Per Our Conversation	[ ]	For Your Approval
[ ]	Take Appropriate Action	[ ]	Review & Comment
[ ]	Please Answer	[ ]	Review & Return

[ ] Original transmittal will follow via mail

Remarks / Response :