

RECEIVED R.H.

APR 1-5 2004

FINANCE
SJVUAPCI

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
#175024
**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 Britz Ag Finance Company, Inc for emission reduction generated by shutdown of the cotton gin, at 16423 W. Kamm Avenue in Helm, CA. The quantity of ERCs to be issued is 19,720 lb-PM10/qr; 381 lb-NOx/qr; 320 lb-CO/qr; 21 lb-VOC/qr; and 11 lb-SOx/qr.

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

The application review for Project #C-1032163 is available for public inspection at the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.
(PUB: April 2, 2004)

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.

April 2, 2004

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 APRIL 2, 2004

Cathy Aguilera

C-978

Story #175024 System FRSCZ

by JALONZO

Time 14:34:39 Date 3/31/04

Account: 2306000SAN Class: 894 Last user: JALONZO

Ad Start: 4/02/04 Ad Stop: 4/02/04 Total Cost: \$177.10 Run Days: fri

Page

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Ronald Harris

TO: ~~LYNN SARGENTI~~

From: The Fresno Bee
Legal Notices Desk
Ph: (559) 441-6115
Fax: (559) 446-5325
Please Print:
This notice on
RUC 85-18 03/31/04
otherwise not valid

RECEIVED R.H.

FEB 24 2004

FINANCE
SJVUAPCD

PROOF OF PUBLICATION

SAN JOAQUIN VALLEY APCD
ATTN FINANCE DEPARTMENT
1990 E GETTYSBURG
FRESNO, CA 93726

COUNTY OF FRESNO
STATE OF CALIFORNIA

EXHIBIT A.

PUBLIC NOTICE

#55567

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 Britz og Finance Company, Inc for shutdown of your cotton gin, at 16423 W. Kamm Avenue in Helm, CA. The quantity of ERCs proposed for banking is 19,720 lb-PM10/qr; 381 lb-NOx/qr; 320 lb CO/qr; 21 lb VOC/qr; and 11 lb SOx/qr for the fourth quarter.

The analysis of the regulatory basis for these proposed actions, Project #C-1032163, 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: Feb. 19, 2004)

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.

February 19, 2004

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 FEBRUARY 19, 2004

Cathy Aguilera

Story #55567 System FRSCZ

by SKAO

Time 11:25:32 Date 2/17/04

Account: 2306000SAN Class: 894 Last user: SKAO

Ad Start: 2/19/04 Ad Stop: 2/19/04 Total Cost: \$233.28 Run Days:

Page 1

PUBLIC NOTICE

#55567

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FOR THE PROPOSED ISSUANCE OF
EMISSION REDUCTION CREDITS**

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(PUB: Feb. 19, 2004)

R.H.

TO: Cathy Pollastrini

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



San Joaquin Valley
Air Pollution Control District

MAR 30 2004

CERTIFIED MAIL

Robert Glassman
Britz Ag Finance Company, Inc
P. O. Box 9050
Fresno, CA 93790

**RE: Notice of Final Action - Emission Reduction Credits
Project Number: C-1032163**

Dear Mr. Glassman:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Britz Ag Finance Company, Inc for emission reduction generated by shutdown of the cotton gin, at 16423 W. Kamm Avenue in Helm, CA. The quantity of ERCs to be issued is 19,720 lb-PM10/qtr; 381 lb-NOx/qtr; 320 lb-CO/qtr; 21 lb-VOC/qtr; and 11 lb-SOx/qtr.

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 February 19, 2004. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on February 13, 2004. 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,



for Seyed Sadredin
Director of Permit Services

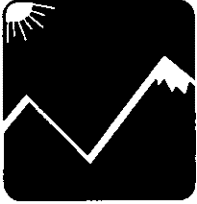
SS:rh
Enclosures
c: David Warner, Permit Services Manager

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 East Gettysburg Avenue
Fresno, CA 93726-0244
(559) 230-6000 • FAX (559) 230-6061
www.valleyair.org

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



San Joaquin Valley
Air Pollution Control District

MAR 30 2004

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

**RE: Notice of Final Action - Emission Reduction Credits
Project Number: C-1032163**

Dear Mr. Rios:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Britz Ag Finance Company, Inc for emission reduction generated by shutdown of the cotton gin, at 16423 W. Kamm Avenue in Helm, CA. The quantity of ERCs to be issued is 19,720 lb-PM10/qtr; 381 lb-NOx/qtr; 320 lb-CO/qtr; 21 lb-VOC/qtr; and 11 lb-SOx/qtr.

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Sincerely,


for Seyed Sadredin
Director of Permit Services

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

David L. Crow
Executive Director/Air Pollution Control Officer

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San Joaquin Valley
Air Pollution Control District

MAR 30 2004

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-1032163

Dear Mr. Tollstrup:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Britz Ag Finance Company, Inc for emission reduction generated by shutdown of the cotton gin, at 16423 W. Kamm Avenue in Helm, CA. The quantity of ERCs to be issued is 19,720 lb-PM10/qtr; 381 lb-NOx/qtr; 320 lb-CO/qtr; 21 lb-VOC/qtr; and 11 lb-SOx/qtr.

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Sincerely,


fr Seyed Sadredin
Director of Permit Services

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

David L. Crow
Executive Director/Air Pollution Control Officer

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Fresno Bee

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

The application review for Project #C-1032163 is available for public inspection at the **SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.**



San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726

Emission Reduction Credit Certificate C-586-1

ISSUED TO: BRITZ INCORPORATED
ISSUED DATE: March 29, 2004
LOCATION OF REDUCTION: 16423 W KAMM AVE
HELM, CA 93627

For VOC Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	21 lbs

Conditions Attached

Method Of Reduction

Shutdown of Entire Stationary Source

Shutdown of Emissions Units

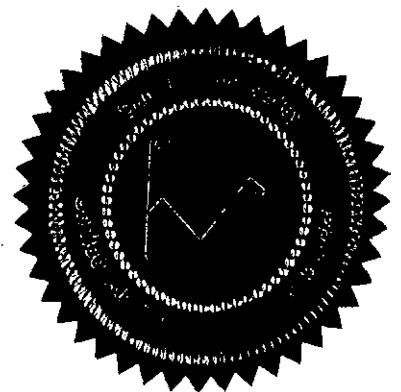
Other

COTTON GIN SHUTDOWN

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

David L. Crow, Executive Director / APCO

for Seyed Sadredin, Director of Permit Services





San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726

Emission Reduction Credit Certificate C-586-2

ISSUED TO: BRITZ INCORPORATED

ISSUED DATE: March 29, 2004

LOCATION OF REDUCTION: 16423 W KAMM AVE
HELM, CA 93627

For NO_x Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	381 lbs

Conditions Attached

Method Of Reduction

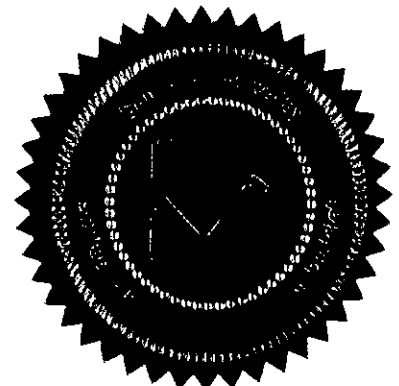
Shutdown of Entire Stationary Source

Shutdown of Emissions Units

Other

COTTON GIN SHUTDOWN

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



David L. Crow, Executive Director / APCO


for Seyed Sadredin, Director of Permit Services



San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726

Emission Reduction Credit Certificate C-586-3

ISSUED TO: BRITZ INCORPORATED
ISSUED DATE: March 29, 2004
LOCATION OF REDUCTION: 16423 W KAMM AVE
HELM, CA 93627

For CO Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	320 lbs

Conditions Attached

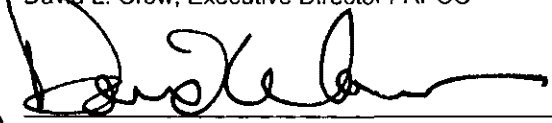
Method Of Reduction

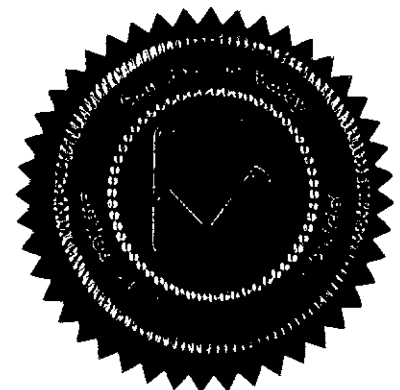
- Shutdown of Entire Stationary Source
 Shutdown of Emissions Units
 Other

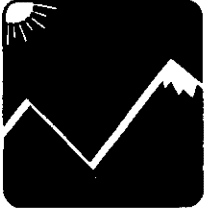
COTTON GIN SHUTDOWN

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

David L. Crow, Executive Director / APCO


for Seyed Sadredin, Director of Permit Services





San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726

Emission Reduction Credit Certificate C-586-4

ISSUED TO: BRITZ INCORPORATED
ISSUED DATE: March 29, 2004
LOCATION OF REDUCTION: 16423 W KAMM AVE
HELM, CA 93627

For PM10 Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	19,720 lbs

Conditions Attached

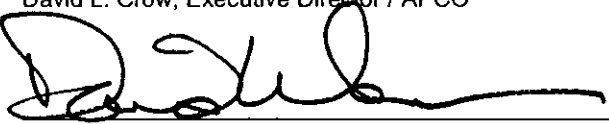
Method Of Reduction

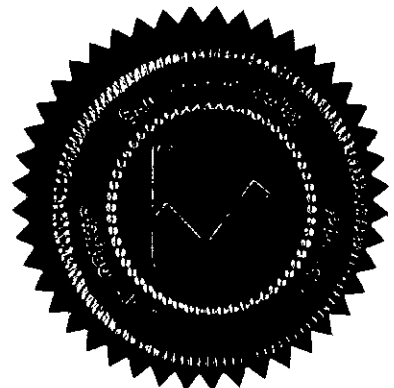
- Shutdown of Entire Stationary Source
 Shutdown of Emissions Units
 Other

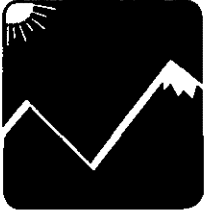
COTTON GIN SHUTDOWN

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

David L. Crow, Executive Director / APCO


for Seyed Sadredin, Director of Permit Services





San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726

Emission Reduction Credit Certificate C-586-5

ISSUED TO: BRITZ INCORPORATED
ISSUED DATE: March 29, 2004
LOCATION OF REDUCTION: 16423 W KAMM AVE
HELM, CA 93627

For SOx Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	11 lbs

Conditions Attached

Method Of Reduction

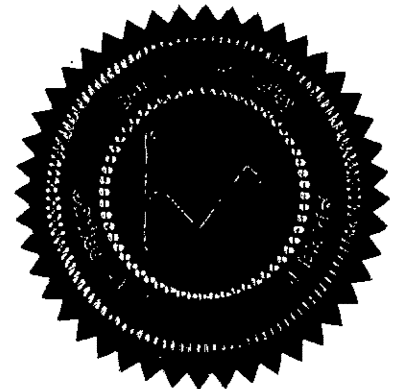
- Shutdown of Entire Stationary Source
 Shutdown of Emissions Units
 Other

COTTON GIN SHUTDOWN

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

David L. Crow, Executive Director / APCO

for Seyed Sadredin, Director of Permit Services





San Joaquin Valley
Unified Air Pollution
Control District

Due Date
4/28/2004

Amount Due
\$ 372.83

Amount Enclosed

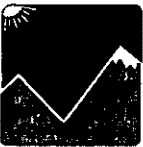
ERCFEE
978 C55906 3/29/2004

RETURN THIS TOP PORTION ONLY, WITH REMITTANCE TO:

BRITZ INCORPORATED
P O BOX 155
HELM, CA 93627

SJVAPCD
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244

Thank You!



San Joaquin Valley
Unified Air Pollution
Control District

SJVAPCD Tax ID: 77-0262563

BRITZ INCORPORATED
16423 W KAMM AVE
HELM, CA 93627

Facility ID
C978

Invoice Date
3/29/2004

Invoice Number
C55906

Invoice Type
Project: C1032163

PROJECT NUMBER: 1032163

APPLICATION FILING FEES	\$ 650.00
ENGINEERING TIME FEES	\$ 372.83
TOTAL FEES	\$ 1,022.83
LESS PREVIOUSLY PAID PROJECT FEES APPLIED TO THIS INVOICE	(\$ 650.00)
PROJECT FEES DUE (Enclosed is a detailed statement outlining the fees for each item.)	\$ 372.83

Invoice Detail

Facility ID: C978

BRITZ INCORPORATED
 16423 W KAMM AVE
 HELM, CA 93627

Invoice Nbr: C55906
 Invoice Date: 3/29/2004
 Page: 1

Application Filing Fees

Project Nbr	Permit Number	Description	Application Fee
C1032163	C-978-1032163-0	Emission Reduction Credit Banking Evaluation Fee	\$ 650.00
Total Application Filing Fees:			\$ 650.00

Engineering Time Fees

Project Nbr	Quantity	Rate	Description	Fee
C1032163	16.3 hours	\$ 62.75/h	Standard Engineering Time	\$ 1,022.82
			Less Credit For Application Filing Fees	(\$ 650.00)
			Standard Engineering Time SubTotal	\$ 372.82
Total Engineering Time Fees:				\$ 372.82



San Joaquin Valley
Air Pollution Control District

DEC 30 2003

Tom Haggard
Britz Ag Finance Company, Inc
PO Box 9050
Fresno, CA 93790

**Re: Notice of Receipt of Complete Application - Emission Reduction Credits
Project Number: C-1032163**

Dear Mr. Haggard:

The District has completed a preliminary review of your application for Emission Reduction Credits (ERCs) resulting from the shutdown of your cotton gin, at 16423 W. Kamm Ave, Helm, CA.

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

Pursuant to District Rule 3010, section 3.0, your application may be subject to an hourly Engineering Evaluation Fee. If the applicable fees exceed the submitted application filing fee, the District will notify you at the conclusion of our review.

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

Sincerely,

Seyed Sadredin
Director of Permit Services


David Warner
Permit Services Manager

rh

David L. Crow
Executive Director/Air Pollution Control Officer

Due Date
4/28/2004

Amount Due
\$ 372.83

Amount Enclosed

ERC FEE
978 C55906 3/29/2004

BRITZ INCORPORATED
P O BOX 155
HELM, CA 93627

SJVAPCD
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244

FILE COPY

Facility ID
C978

Invoice Date
3/29/2004

Invoice Number
C55906

Invoice Type
Project: C1032163

BRITZ INCORPORATED
16423 W KAMM AVE
HELM, CA 93627

PROJECT NUMBER: 1032163

APPLICATION FILING FEES	\$ 650.00
ENGINEERING TIME FEES	\$ 372.83
TOTAL FEES	\$ 1,022.83
LESS PREVIOUSLY PAID PROJECT FEES APPLIED TO THIS INVOICE	(\$ 650.00)
PROJECT FEES DUE (Enclosed is a detailed statement outlining the fees for each item.)	\$ 372.83

Invoice Detail

Facility ID: C978

BRITZ INCORPORATED
 16423 W KAMM AVE
 HELM, CA 93627

Invoice Nbr: C55906
 Invoice Date: 3/29/2004
 Page: 1

Application Filing Fees

Project Nbr	Permit Number	Description	Application Fee
C1032163	C-978-1032163-0	Emission Reduction Credit Banking Evaluation Fee	\$ 650.00
Total Application Filing Fees:			\$ 650.00

Engineering Time Fees

Project Nbr	Quantity	Rate	Description	Fee
C1032163	16.3 hours	\$ 62.75/h	Standard Engineering Time	\$ 1,022.82
			Less Credit For Application Filing Fees	(\$ 650.00)
			Standard Engineering Time SubTotal	\$ 372.82
Total Engineering Time Fees:				\$ 372.82

FILE

COPY

Preliminary Review ERC APPLICATION EVALUATION

Project #1032163

Engineer: Renald Harris
Date: December 29, 2003

Britz Ag Finance Company, Inc
PO Box 9050
Fresno, CA 93790

Contact Name: Mr. Robert Glassman
Phone: (559) 448-8000

Date Application Received: December 22, 2003
Date Deemed Complete: December 29, 2003

I. Summary:

The primary business of this facility is ginning cotton. The applicant submitted an application to bank the emission reduction credits (ERCs) from the shutdown of a cotton gin. Copies of the surrendered permits are included in Appendix A of this report.

II. Applicable Rules:

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

III. Location of Reduction:

Britz Inc Gin
16423 W. Kamm Avenue
Helm, CA

IV. Method of Generating Reductions:

The emissions reduction is generated by the shutdown of permitted cotton ginning operation. The 1D-3D cyclone collectors controlled the facility's PM10 emissions. Their gin was limited by permit condition to ginning rate of 550 bales per day. The applicant surrendered the PTO on December 22, 2003 for this location in concurrence with the submittal of the ERC application (Appendix A).

V. Calculations:

A. Assumptions and Emission Factors

The PTO specifies an emission factor of 0.835 lb-PM₁₀/bale (Appendix B). *delete*

- The gin equipment also included burners providing heated air to control the moisture content of the cotton. These burners were fired on natural gas and ERCs are also requested from their shutdown. The PTO does not indicate natural gas combustion emission factors, so AP-42 EFs shall be used.
- Annual emissions will be rounded to the nearest pound in accordance with the District Policy.
- The exhaust from the burners flows through the process air and exits at the cyclone collectors, in this case, PM10 emissions exhausted from the cyclones include emissions from both the burners and the ginning process. Therefore, the ginning PM10 emissions are not added to those calculated for the burners to determine the HAE.
- Bales are standardized to 500 lb/bale.

B. Baseline Period Determination and Data

The baseline period consists of two years immediately preceding the date of reduction, or at least two consecutive years within five years prior to the ERC application, if they are more representative of "normal source operation" (Rule 2201, Section 3.8).

According to Rule 2301, Section 3.11, the date of shutdown for permitted sources shall be the date of the surrender of the operating permits, unless the District determines that:

- 1) The unit has been removed or has fallen into an inoperable and unmaintained condition such that start-up would require an investment exceeding 50% of the current replacement cost; and

- 2) The owner cannot demonstrate to the satisfaction of the District that the owner intended to operate again.

22

For this cotton gin the date of shutdown is the date of the surrender of the operating permits. The applicant surrendered the Permits to Operate for the gin August 20, 2003, that was received by the District on December 20, 2003. The applicant has provided the historical production data (see Appendix C) for two years immediately preceding the date of reduction 2001 and 2002 as summarized in Table 1 and provided as part of the ERC application.

Table 1. Historical Throughput and Fuel Use for Blitz Inc Gin

Season Start Date	Season End Date	Bales Produced (500 lb bales)	Natural Gas Use (therms)
		4 th Qtr	4 th Qtr
10/15/01	12/17/01	22,109	40,989
10/03/02	12/23/02	30,372	43,511
Average '01 &'02		26,241	42,250

Based on the ginning records provided, the average throughput from the two years immediately proceeding shutdown (2001 and 2002) is 26,241 bales/year, which appears to be reasonably representative of the facilities emissions and will be used as the baseline period. The baling rates in Table 1 for 2001 and 2002 were based upon daily records. For days when the records show bale production in excess of the permitted baling rate, the permitted limit of 550 bale/day was used.

The same 2001/2002-baseline period will be used for historic fuel usage.

The gin equipment also included natural gas-fired dryers providing heated air to control the moisture content of the cotton.

All dryers are fired on natural gas. Emissions factors for natural gas combustion are from AP-42 (07/98) Tables 1.4-1, and 1.4-2 for small boilers (<100 MMBtu/hr), uncontrolled (see Appendix D), except for SO_x, which the SO_x emission factor will be based on the mass balance equation using 1.0 gr-S/100 ft³ (pursuant to PG&E standard for sulfur content):

Britz Ag Finance Company, Inc
 Facility Number: C-978
 Project Number: 1032163

$$SO_{X(natural\ gas)} (lb/MMBtu) = (\cancel{1.0}gr/100scf) \times (1lb/7000gr) \times (1scf/1000Btu) \times (10^6\ Btu/MMBtu) \times (2\ lb-SO_x/1\ lb-S)$$

$$SO_{X(natural\ gas)} (lb/MMBtu) = 0.0029\ lb/MMBtu.$$

Table 2. Natural Gas Combustion Emission Factors

Pollutant	[lb/MMscf]	[lb/MMBtu]
NO _x	100	0.1000
SO _x	2.9	0.0029
CO	84	0.0840
VOC	5.5	0.0055

C. Historical Actual Emissions (HAE)

Historical Actual Emissions (HAE) are emissions having actually occurred and are calculated using process data and recognized emission factors, per Rule 2201, Section 3.23.

PM10

The HAE is calculated based on the emission factor discussed in section V.A of this evaluation and the average baling rate during the baseline period discussed in Section V.B.

$$\begin{aligned} \text{HAE for PM}_{10} \text{ (lb/yr)} &= 0.835\ \text{lb-PM}_{10}/\text{bale} \times 26,241\ \text{bale/yr} \\ &= \mathbf{21,911\ lb-PM}_{10}/\text{year} \end{aligned}$$

NO_x, CO, VOC, & SO_x

The HAE is calculated using emission factors for natural gas combustion from EPA's AP-42, and the average natural gas use during the baseline period shown in Table 1 of this evaluation.

$$\text{Historical Natural Gas Usage (4}^{\text{th}}\ \text{Qtr)} = 42,250\ \text{therms/yr}$$

$$\text{Total MMBtu} = \text{total therms} \times (100\ \text{ft}^3/\text{therm}) \times (1000\ \text{Btu}/\text{ft}^3) \times (1\ \text{MMBtu}/1,000,000\ \text{Btu})$$

$$\begin{aligned} 42,250\ \text{therms/yr} \times (100\ \text{ft}^3/\text{therm}) \times (1000\ \text{Btu}/\text{ft}^3) \times (1\ \text{MMBtu}/1,000,000\ \text{Btu}) \\ \text{Historical Natural Gas Usage (MMBtu/yr)} = 4,225\ \text{MMBtu/yr} \end{aligned}$$

Emissions factors for natural gas combustion are from AP-42 (07/98) Tables 1.4-1 and 1.4-2, for small boilers (<100 MMBtu/hr), uncontrolled.

$$HAE_{\text{Natural Gas}} (\text{lb/yr}) = \text{Historical Natural Gas Usage (MMBtu)} \times \text{Emission Factor (lb/MMBtu)}$$

*NOx, CO, VOC
 The EF for SOx
 is based on 2002
 standard for sulfur*

TABLE 3 HAE for Combustion of Natural Gas

Pollutant	EF _(Natural Gas) (lb/MMBtu)	HAE _{Natural Gas} 4 th Quarter (lb/yr)
NOx	0.1000	423
SOx	0.0029	12
CO	0.0840	355
VOC (non-methane)	0.0055	23

D. Adjustments to HAE

Pursuant to Section 4.12.1 of Rule 2201, Historical Actual Emissions must be discounted for any emissions reductions proposed in the District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act.

The District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act does include cotton gins as part of the PM10 plan. A best available control measure (BACM) requirements have not been identify for the class and category of cotton gins, but until clarification of control measure language to ensure that the control measure will be applied as needed to meet BACM; the most current best available control technology (BACT) guideline for cotton gins with natural gas-fired dryers should be used. Adjustment should be made for the control equipment and any emission factors correlating to that control equipment.

BACT Guideline 5.3.2 (Cotton Gin with Natural Gas-Fired Dryer, ≤ 8 MMBtu/hr) requires NO_x to be 0.1 lb/MMBtu, which is the same as AP-42, Natural Gas Combustion, and so no change. As for PM10, the control measures required are 1D-3D cyclones, which were the same control

measures used by this facility (see PTO conditions in Appendix B). Based on the facility meeting the requirements of BACT Guideline 5.3.2, then no additional adjustment have to be made for the control measures or for the District Air Quality Plan.

E. Actual Emissions Reductions (AER)

Per Rule 2201, Section 4.12, the Actual Emissions Reductions due to shutdown of an emissions unit is equal to the HAE minus PE2.

$$AER = HAE - PE2$$

$$HAE = HAE \text{ (for the unit prior to shutdown)} = 21,911 \text{ lb-PM10/year}$$

$$PE2 = PE2 \text{ (for the unit after shutdown)} = 0 \text{ lb-PM10/year}$$

$$AER = 21,911 \text{ lb-PM10/year} - 0 \text{ lb-PM10/year}$$

$$AER = 21,911 \text{ lb-PM10/year}$$

F. Air Quality Improvement Deduction

The air quality improvement deduction per Rule 2201, Section 4.12.1, is 10% of the Actual Emissions Reductions.

G. Increases in Permitted Emissions (IPE)

No IPE is associated with this project.

H. Bankable Emissions Reductions Credits

The bankable emissions reduction credits, presented in Table 4, are determined by subtraction of the Air Quality Improvement Deduction (discussed in Section V.F) from the AER. The emission reductions occurred in the fourth quarter (see throughput records in Section V.B. Table 1).

Table 4 Bankable Emissions Reductions Credits (lbs/qtr)

POLLUTANT	1st QTR	2nd QTR	3rd QTR	4th QTR
NOx	0	0	0	381
SOx	0	0	0	11
PM10	0	0	0	19,720
CO	0	0	0	320
VOC	0	0	0	21

VI. Compliance:

To comply with the definition of Actual Emissions Reductions (Rule 2201, Section 3.2.1), the reductions must be:

A. Real

The emissions reductions were generated by the shutdown of the ginning equipment. The emissions reductions were calculated from actual historic production data and recognized emission factors. The emission factor of 0.835 lb-PM₁₀/bale, based on the PTO emission limit is conservative. Based on past source tests of similarly controlled gins, actual emission rates may even exceed 2.0 lbs-PM₁₀/bale.

Therefore, the allowed reductions are real.

B. Enforceable

The PTO for this facility has been surrendered and the gins cannot be operated without a valid PTO. Therefore, the reductions are enforceable.

C. Quantifiable

Reduction amounts were calculated from historic process throughput data, source test results from similar operations, California Cotton Ginners Association emission factors, and methods according to District Rule 2201. Therefore, the reductions are quantifiable.

D. Permanent

The gin has been shutdown, and the PTO has been surrendered. Further operation requires an application to the District. In addition, the facility was converted into a sulfur powder manufacturing operation, which produces fungicide for raisins.

Therefore, the reductions are permanent.

E. Surplus

Shutdown of the gin was voluntary and not required by any law, rule, agreement, or regulation. These ERCs are not needed for their current or proposed operations.

In addition, the actual emissions almost certainly exceeded the permitted level of 0.835 lb-PM₁₀/bale. Because we used 0.835 lb-PM₁₀/bale in our calculations of AER, we have assured the banked ERCs are surplus of the permitted limits.

Therefore, the reductions are surplus.

F. Not used for the approval of an Authority to Construct or as offsets

The emission reduction credits generated by the shutdown of the cotton ginning operations were not used for the approval of any Authority to Construct or as offsets.

G. Timely submittal

Section 5.5 of Rule 2301 states that ERC certificate applications for reductions shall be submitted within 180 days after the emission reduction occurs. The ERC application was received on December 22, 2003. On the same day, the applicant also agreed to surrender the PTO and permanently ceases operations at this location (see Appendix B). Therefore, the application was submitted in a timely fashion.

VII. Recommendation:

I recommend based on the analysis above that Emission Reduction Credit final evaluation be conducted.

ERC TABLE TO BE INSERTED HERE

Britz Ag Finance Company, Inc
Facility Number: C-978
Project Number: 1032163

Appendices:

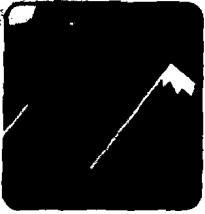
Appendix A: ERC Application

Appendix B: PTO C-978-1-4

Appendix C: Historical Production Data

Appendix D: AP-42 Natural Gas Combustion Emission factors

Appendix A: PTO C-978-1-4



San Joaquin Valley
Air Pollution Control District

Permit to Operate

FACILITY: C-978

EXPIRATION DATE: 08/31/2007

LEGAL OWNER OR OPERATOR:
MAILING ADDRESS:

BRITZ INCORPORATED
P O BOX 155
HELM, CA 93627

FACILITY LOCATION:

16423 W KAMM AVE
HELM, CA 93627

FACILITY DESCRIPTION:

COTTON GINNING

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

David L. Crow
Executive Director / APCO

Seyed Sadredin
Director of Permit Services

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-978-1-4

EXPIRATION DATE: 08/31/2007

EQUIPMENT DESCRIPTION:

COTTON GIN WITH FOUR SAW-TYPE GIN STANDS, THREE STAGE PRE-CLEANING, OVERFLOW, FOUR 1ST & FOUR 2ND STAGE LINT CLEANERS, BATTERY CONDENSER, MOTES, & 9 MMBTU/HR NATURAL GAS-FIRED DRYING SYSTEM.

PERMIT UNIT REQUIREMENTS

1. Daily ginning rate shall not exceed 137.5 tons of baled cotton per day (550 bales/day, based on 500-pound bales). [District Rule 2201]
2. Annual ginning rate shall not exceed 9,500 tons of baled cotton per year (38,000 bales/year, based on 500-pound bales). [District Rule 2201]
3. Emissions of PM10 shall not exceed 3.34 pounds per ton of baled cotton (0.835 pounds per bale, based on 500-pound bales). [District Rule 2201]
4. 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]
5. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
7. 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]
8. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
9. Daily records of the number and weight of bales produced shall be maintained on site. Records shall be retained for at least two years and shall be made available to the District staff upon request. [District Rule 1070]
10. Emissions from the wagon suction fans shall be controlled by two 48" 1D-3D cyclone collectors. [District Rule 2201]
11. Emissions from the trash fan shall be controlled by two 42" 1D-3D cyclone collectors. [District Rule 2201]
12. Emissions from the #1 moist air fan shall be controlled by two 42" 1D-3D cyclone collectors. [District Rule 2201]
13. Emissions from the #2 moist air fan shall be controlled by two 42" 1D-3D cyclone collectors. [District Rule 2201]
14. Emissions from the #3 moist air fan shall be controlled by two 42" 1D-3D cyclone collectors. [District Rule 2201]
15. Emissions from the overflow separator shall be controlled by two 42" 1D-3D cyclone collectors. [District Rule 2201]
16. Emissions from the 1st stage lint cleaners shall be controlled by four 54" 1D-3D cyclone collectors. [District Rule 2201]
17. Emissions from the 2nd stage lint cleaners shall be controlled by four 54" 1D-3D cyclone collectors. [District Rule 2201]
18. Emissions from the battery condenser shall be controlled by three 66" 1D-3D cyclone collectors. [District Rule 2201]
19. Emissions from the mote fans shall be controlled by one 68" 1D-3D cyclone collectors. [District Rule 2201]
20. Emissions from the motes transfer fan shall be controlled by one 28" 1D-3D cyclone collectors. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

Appendix B: ERC Application

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-978-1-4

EXPIRATION DATE: 08/31/2007

EQUIPMENT DESCRIPTION:

COTTON GIN WITH FOUR SAW-TYPE GIN STANDS, THREE STAGE PRE-CLEANING, OVERFLOW, FOUR 1ST & FOUR 2ND STAGE LINT CLEANERS, BATTERY CONDENSER, MOTES, & 9 MMBTU/HR NATURAL GAS-FIRED DRYING SYSTEM.

PERMIT UNIT REQUIREMENTS

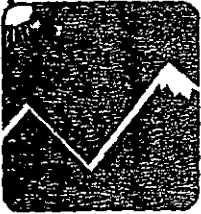
1. Daily ginning rate shall not exceed 137.5 tons of baled cotton per day (550 bales/day, based on 500-pound bales). [District Rule 2201]
2. Annual ginning rate shall not exceed 9,500 tons of baled cotton per year (38,000 bales/year, based on 500-pound bales). [District Rule 2201]
3. Emissions of PM10 shall not exceed 3.34 pounds per ton of baled cotton (0.835 pounds per bale, based on 500-pound bales). [District Rule 2201]
4. 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]
5. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
7. 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]
8. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
9. Daily records of the number and weight of bales produced shall be maintained on site. Records shall be retained for at least two years and shall be made available to the District staff upon request. [District Rule 1070]
10. Emissions from the wagon suction fans shall be controlled by two 48" 1D-3D cyclone collectors. [District Rule 2201]
11. Emissions from the trash fan shall be controlled by two 42" 1D-3D cyclone collectors. [District Rule 2201]
12. Emissions from the #1 moist air fan shall be controlled by two 42" 1D-3D cyclone collectors. [District Rule 2201]
13. Emissions from the #2 moist air fan shall be controlled by two 42" 1D-3D cyclone collectors. [District Rule 2201]
14. Emissions from the #3 moist air fan shall be controlled by two 42" 1D-3D cyclone collectors. [District Rule 2201]
15. Emissions from the overflow separator shall be controlled by two 42" 1D-3D cyclone collectors. [District Rule 2201]
16. Emissions from the 1st stage lint cleaners shall be controlled by four 54" 1D-3D cyclone collectors. [District Rule 2201]
17. Emissions from the 2nd stage lint cleaners shall be controlled by four 54" 1D-3D cyclone collectors. [District Rule 2201]
18. Emissions from the battery condenser shall be controlled by three 66" 1D-3D cyclone collectors. [District Rule 2201]
19. Emissions from the mote fans shall be controlled by one 68" 1D-3D cyclone collectors. [District Rule 2201]
20. Emissions from the motes transfer fan shall be controlled by one 28" 1D-3D cyclone collectors. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

21. Emissions from the mote cleaner trash fan shall be controlled by one 30" 1D-3D cyclone collectors, [District Rule 2201]

These terms and conditions are part of the Facility-wide Permit to Operate.



San Joaquin Valley
Air Pollution Control District

Notice of Revised Permit Format

This may be the first Permit to Operate you have received since the Air Pollution Control District has revised the permit format.

Your Permit to Operate now contains a cover page, permit unit requirements, and a set of facility-wide permit conditions (if applicable). The permit unit requirements apply only to the specific permit units while the facility-wide conditions apply to every permit unit at your facility.*

Please note that this Permit to Operate supercedes all previous permits for your facility.

If you have any questions, please call our Small Business Assistance Office @ (559) 230-5888.

**Failure to comply with the Permit to Operate may result in enforcement action.*

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

Britz Ag Finance Co., Inc.

P.O Box 9050
Fresno, CA 93790-9050

Tele: (559) 448-8000
FAX: (559) 448-8020

RECEIVED
DEC 22 2003
Permit Services
SJVAPCD

December 22, 2003

San Joaquin Valley Air Pollution Control District
1990 East Gettysburg Avenue
Fresno, California 93726-0244

Attention: Mr. Joven Refuerzo

The Britz Gin, located at 16423 W. Kamn Ave, Helm, CA is requesting Emission Reduction Credits (ERC'S), generated by the shutdown of the facility and surrender of the existing Permit to Operate (PTO), effective upon submittal of this application.

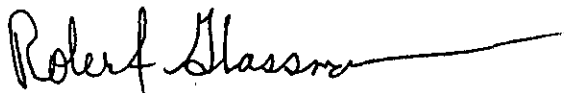
The request for ERC's generated, consists of PM 10, VOC, NOx, CO, and SOx, (to be calculated by the district), based on the historical fuel consumption, historical production, AP 42, and emission factors outlined in the current PTO. ERC's to be issued to Britz Ag Finance, Inc.

Copies of the facility's production history, fuel consumption reports, the PTO, # C - 978 - 1 - 4, and the check number 02448 in the amount of \$650.00 are attached for your review.

Please refer to item number 19 on permit number C-4289-2-0 and item number 12 on permit number C-4289-1-0, (copies attached) as reference to the ERC request.

Thank you in advance for your assistance in this matter.

Sincerely,



Robert Glassman
Britz AG Finance Co. Inc.


San Joaquin Valley Air Pollution Control District

Application for

RECEIVED
DEC 22 2003
Permit Services
SJ APCD

EMISSION REDUCTION CREDIT (ERC)

CONSOLIDATION OF ERC CERTIFICATES

1. ERC TO BE ISSUED TO: <u>Britz Ag Finance Co. Inc.</u>		Facility ID: _____ (if known)				
2. MAILING ADDRESS: Street/P.O. Box: <u>P.O. Box 9050</u>						
City: <u>Fresno</u>		State: <u>CA</u> Zip Code: <u>93790</u>				
3. LOCATION OF REDUCTION: Street: <u>16423 W. Kamm Ave.</u> City: <u>Helm, CA 93627</u> _____/4 SECTION _____ TOWNSHIP _____ RANGE _____		4. DATE OF REDUCTION: <u>8/20/03</u>				
5. PERMIT NO(S): <u>C-978-1-4</u>		EXISTING ERC NO(S): _____				
6. METHOD RESULTING IN EMISSION REDUCTION: <input checked="" type="checkbox"/> SHUTDOWN <input type="checkbox"/> RETROFIT <input type="checkbox"/> PROCESS CHANGE <input type="checkbox"/> OTHER DESCRIPTION: _____ (Use additional sheets if necessary)						
7. REQUESTED ERCs (In Pounds Per Calendar Quarter):						
	VOC	NOx	CO	PM10	SOx	OTHER
1ST QUARTER						
2ND QUARTER						
3RD QUARTER						
4TH QUARTER				27255		
8. SIGNATURE OF APPLICANT: 		TYPE OR PRINT TITLE OF APPLICANT: <u>Vice President</u>				
9. TYPE OR PRINT NAME OF APPLICANT: <u>Bob Glassman</u>		DATE: _____	TELEPHONE NO: <u>448-8000</u>			

FOR APCD USE ONLY:

DATE STAMP	FILING FEE RECEIVED: \$ <u>650.00, 02448</u> DATE PAID: <u>12/22/03</u> PROJECT NO.: <u>C-1032163</u> FACILITY ID.: <u>C-978</u>
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**SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT
SUPPLEMENTAL APPLICATION FORM**

**COTTON GINS
Emission Reduction Credit (ERC)**

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

Certificate to be Issued to: <u>Britz Ag Finance Co. Inc.</u>
Gin Location: <u>16423 W. Kamm Ave., Helm CA 93627</u>

1. Are the emission reductions due to the installation of control equipment at an existing cotton gin? No

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

2. Are the emission reductions due to the shut-down of a cotton gin?
Yes

If "yes", please list the applicable Permit to Operate number(s):
C-978-1-4

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

MM/DD/YY: 8 / 20 / 03

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

*5yr
AVG 26,622*

Season	<u>1998</u>	<u>1999</u>	<u>192000</u>	<u>2001</u>	<u>2002</u>
Start MM/DD/YY	10/17/98	10/18/99	10/10/00	10/15/01	10/03/02
End MM/DD/YY	12/14/98	12/07/99	1/03/01	12/17/01	12/23/02
No. of Bales*	24,646	20,631	33,989	22,554	31,292

*Number of bales after correcting to 500 pounds per bale.

(Please continue on other side)

SACG-2 8/93

5. Provide emission factors (EF) in pounds of PM₁₀ emissions per 500 pound bale:

System	Pre-mod or Pre-shutdown EF	Post-mod EF*	References
Unloading #1/ #2	/	/	
Pre-Cleaner #1/ #2/ #3	/ /	/ /	
Overflow			
Lint Cleaner #1/ #2/ #3	/ /	/ /	
Battery Condenser			
Trash			
Motes			
Motes Trash			
Other			
Other			
Totals	.835		PTO

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

Appendix C: Historical Production Data

2001
BRITZ GIN PARTNERSHIP II (BRTZG-01) 12/19/03
Ginning Summary

Trailer/Modules: «BOTH»

Date	Loads	Net weight	Bales	Bale Wt	Seed Wt	Turnout
10/15/01	7	133100	101	49977	68412	37.55%
10/16/01	8	166200	120	61702	84760	37.13%
10/17/01	16	288540	213	108585	147149	37.63%
10/18/01	16	291660	211	107176	148744	36.75%
10/19/01	18	345680	252	129355	178458	37.42%
10/20/01	25	523660	378	193622	272124	36.97%
10/21/01	29	581060	429	218198	299328	37.55%
10/22/01	21	412000	303	155125	212170	37.65%
10/23/01	25	511680	380	192403	263506	37.60%
10/24/01	21	454300	328	166069	233957	36.55%
10/25/01	18	392220	286	145270	201985	37.04%
10/26/01	24	480340	356	178686	247364	37.20%
10/27/01	29	562320	421	212620	289520	37.81%
10/28/01	27	522040	390	197949	268838	37.92%
10/29/01	23	476060	348	177871	245160	37.36%
10/30/01	20	437160	312	158171	226794	36.18%
10/31/01	21	425440	315	160495	219526	37.72%
11/01/01	30	623480	453	230355	319477	36.95%
11/02/01	31	632980	448	227646	325973	35.96%
11/03/01	30	600120	430	219209	309047	36.53%
11/04/01	22	474580	340	172987	244916	36.45%
11/05/01	29	590820	434	221812	304775	37.54%
11/06/01	30	594240	433	221302	305134	37.24%
11/07/01	31	589660	413	213292	303871	36.17%
11/08/01	30	624300	430	223502	325398	35.80%
11/09/01	30	650580	464	238486	335053	36.66%
11/10/01	24	547360	385	196875	281877	35.97%
11/11/01	14	296580	202	103593	152733	34.93%
11/12/01	17	376160	260	132459	193713	35.21%
11/13/01	17	367740	263	132843	189378	36.12%
11/14/01	22	447020	323	164644	230209	36.83%
11/15/01	26	511600	351	180432	263463	35.27%
11/16/01	21	419840	309	158473	216054	37.75%
11/17/01	22	455900	339	171923	234778	37.71%
11/18/01	20	433540	308	157481	223264	36.32%
11/19/01	22	463695	329	168293	238794	36.29%
11/20/01	22	471280	337	172726	242482	36.65%
11/21/01	20	433580	310	158181	223289	36.48%
11/23/01	22	454300	332	169563	233956	37.32%
11/24/01	24	488300	362	183906	251545	37.66%
11/25/01	21	398600	293	148513	207262	37.26%
11/26/01	21	440760	319	163348	226655	37.06%
11/27/01	25	508520	343	173620	261877	34.14%
11/28/01	29	593055	430	220519	296839	37.18%
11/29/01	23	543120	377	191964	275396	35.34%
11/30/01	26	584020	430	220384	292745	37.74%
12/01/01	26	594200	428	216919	297100	36.51%
12/02/01	28	641080	427	219965	327173	34.31%
12/03/01	27	611240	376	191825	317178	31.38%
12/04/01	26	595040	408	207040	299835	34.79%
12/05/01	22	480440	346	175188	243615	36.46%

BRITZ GIN PARTNERSHIP II (BRTZG-01) 12/19/03
Ginning Summary

Trailer/Modules: «BOTH»

Date	Loads	Net weight	Bales	Bale Wt	Seed Wt	Turnout
12/06/01	30	631600	471	237802	322113	37.65%
12/07/01	25	515060	391	197976	262643	38.44%
12/08/01	26	543340	394	202845	277096	37.33%
12/09/01	26	570260	421	215277	290821	37.75%
12/10/01	22	479120	356	180530	244348	37.68%
12/11/01	20	417460	309	158903	213215	38.06%
12/12/01	27	520960	375	192535	268291	36.96%
12/13/01	27	589980	414	211374	303495	35.83%
12/14/01	23	494460	342	174624	254645	35.32%
12/15/01	27	552220	389	198993	284389	36.04%
12/16/01	28	566400	399	203386	291689	35.91%
12/17/01	18	388080	273	139995	199856	36.07%
*TOTAL :	1477	30810130	22109	11276782	15815250	36.60%

500th Basis = 22554 Bales

2002
BRITZ GIN PARTNERSHIP II (BRTZG-02) 12/19/03
Ginning Summary

Trailer/Modules: «BOTH»

Date	Loads	Net weight	Bales	Bale Wt	Seed Wt	Turnout
10/03/02	12	261940	184	95134	135814	36.32%
10/04/02	11	255220	177	92560	132711	36.27%
10/05/02	12	270660	187	96887	140737	35.80%
10/06/02	12	288020	195	102248	149770	35.50%
10/07/02	19	401120	276	142898	208971	35.62%
10/08/02	21	443860	307	157476	230808	35.48%
10/09/02	29	598860	413	212805	311622	35.54%
10/10/02	30	632420	430	222532	334147	35.19%
10/11/02	35	601120	412	210976	317803	35.10%
10/12/02	30	625060	422	217828	331276	34.85%
10/13/02	28	585580	402	205517	308971	35.10%
10/14/02	28	581980	411	209116	301386	35.93%
10/15/02	27	538520	396	203958	275290	37.87%
10/16/02	23	459520	333	170403	234356	37.08%
10/17/02	22	448640	338	173423	229407	38.66%
10/18/02	22	499320	348	180663	257611	36.18%
10/19/02	31	627120	460	236704	331061	37.74%
10/20/02	25	491060	364	185748	250443	37.83%
10/21/02	24	489780	369	188324	250002	38.45%
10/22/02	29	629880	455	234618	321236	37.25%
10/23/02	25	516000	373	192424	263189	37.29%
10/24/02	30	652020	464	238859	332529	36.63%
10/25/02	27	628080	435	225071	320471	35.83%
10/26/02	25	579320	401	206050	301150	35.57%
10/27/02	28	655000	438	224957	339194	34.34%
10/28/02	29	615190	422	215903	319898	35.10%
10/29/02	32	682320	465	239305	354670	35.07%
10/30/02	33	696180	463	239908	365669	34.46%
10/31/02	35	724840	479	246810	379854	34.05%
11/01/02	36	718000	467	241165	374928	33.59%
11/02/02	30	654220	405	210726	346723	32.21%
11/03/02	34	698620	442	228623	370271	32.72%
11/04/02	34	746500	497	255448	395302	34.22%
11/05/02	35	783680	518	267670	415880	34.16%
11/06/02	32	710280	456	235826	376327	33.20%
11/07/02	23	541860	351	182853	287185	33.75%
11/08/02	30	677520	430	221798	357178	32.74%
11/09/02	19	385240	249	128209	204175	33.28%
11/10/02	28	609650	376	194668	323118	31.93%
11/11/02	29	648100	397	204625	342895	31.57%
11/12/02	33	666760	434	223867	348349	33.58%
11/13/02	25	568360	350	179614	301230	31.60%
11/14/02	31	676340	432	222576	358471	32.91%
11/15/02	29	605650	389	201490	320994	33.27%
11/16/02	16	359020	233	120013	190279	33.43%
11/17/02	27	566100	379	194941	294558	34.44%
11/18/02	19	390660	256	132723	203141	33.97%
11/19/02	28	523370	353	181809	268957	34.74%
11/20/02	39	656460	436	223080	339504	33.98%
11/21/02	34	616260	425	219415	317389	35.60%
11/22/02	29	558840	403	207994	282994	37.22%

BRITZ GIN PARTNERSHIP II (BRTZG-02) 12/19/03
 Ginning Summary

Trailer/Modules: «BOTH»

Date	Loads	Net weight	Bales	Bale Wt	Seed Wt	Turnout
11/23/02	32	621080	406	209512	322943	33.73%
11/24/02	27	513720	355	180123	264799	35.06%
11/25/02	26	532540	371	189757	271596	35.63%
11/26/02	24	516320	353	182913	263323	35.43%
11/27/02	27	595800	394	203422	311889	34.14%
11/29/02	31	657060	427	219836	348243	33.46%
11/30/02	22	491140	318	163318	260305	33.25%
12/01/02	32	661980	422	217264	350848	32.82%
12/02/02	30	684800	443	228808	362941	33.41%
12/03/02	30	649000	428	219433	341605	33.81%
12/04/02	33	729080	506	260110	371832	35.68%
12/05/02	27	533640	355	184400	276186	34.56%
12/06/02	33	673060	442	230165	349991	34.20%
12/07/02	26	543180	374	192835	278305	35.50%
12/08/02	22	505440	343	177996	257563	35.22%
12/09/02	29	608620	385	198722	315345	32.65%
12/10/02	25	501170	337	172046	256635	34.33%
12/11/02	30	529870	368	189096	283590	35.69%
12/12/02	14	251560	177	90167	135842	35.84%
12/13/02	28	537880	375	192672	279957	35.82%
12/14/02	26	554600	375	191546	282845	34.54%
12/15/02	27	610220	406	209319	311203	34.30%
12/16/02	26	496860	350	179457	253397	36.12%
12/17/02	25	489140	341	174197	249514	35.61%
12/18/02	28	504670	347	179282	260956	35.52%
12/19/02	26	508440	346	179317	259284	35.27%
12/20/02	25	487820	345	175972	248747	36.07%
12/21/02	29	558680	387	199067	284928	35.63%
12/22/02	23	493940	325	168714	251910	34.16%
12/23/02	5	109020	74	38072	55601	34.92%
*TOTAL :	2162	44990450	30372	15645776	23412017	34.78%

500 # Basis = 31292 Bales

1999
BRITZ GIN PARTNERSHIP II (BRITZGIN) 12/19/03
Ginning Summary

D

Trailer/Modules: «BOTH»

Date	Loads	Net weight	Bales	Bale Wt	Seed Wt	Turnout
10/18/99	12	238560	170	86539	122332	36.28%
10/19/99	18	340980	252	127912	175217	37.51%
10/20/99	21	385400	288	147305	199614	38.22%
10/21/99	19	379340	293	150440	198095	39.66%
10/22/99	14	285940	209	106138	147201	37.12%
10/23/99	29	557880	415	214280	306678	38.41%
10/24/99	17	341860	260	131566	185864	38.49%
10/25/99	11	213880	162	82641	114768	38.64%
10/26/99	23	450060	333	169702	242923	37.71%
10/27/99	23	421420	309	157171	233986	37.30%
10/28/99	25	493280	365	186353	270737	37.78%
10/29/99	25	505280	375	192016	261037	38.00%
10/30/99	33	683840	456	232923	391686	34.06%
10/31/99	35	709920	519	265763	380727	37.44%
11/01/99	21	388880	297	149801	201017	38.52%
11/02/99	25	495600	353	179482	276654	36.22%
11/03/99	28	583520	406	207596	325931	35.58%
11/04/99	27	512000	376	192128	268110	37.53%
11/05/99	32	591600	406	207066	321741	35.00%
11/06/99	33	657640	467	238907	358055	36.33%
11/07/99	29	577700	463	235220	288697	40.72%
11/08/99	25	487940	382	193260	244317	39.61%
11/09/99	23	482120	351	178851	248749	37.10%
11/10/99	30	605580	457	231475	304939	38.22%
11/11/99	30	642740	462	237295	336084	36.92%
11/12/99	32	646020	464	235955	314160	36.52%
11/13/99	37	761160	496	253240	402960	33.27%
11/14/99	33	663550	466	236352	335574	35.62%
11/15/99	31	638180	490	248954	329608	39.01%
11/16/99	35	718220	525	267523	385695	37.25%
11/17/99	31	610060	461	233596	321408	38.29%
11/18/99	29	605980	449	228214	317550	37.66%
11/19/99	33	650480	504	256568	349949	39.44%
11/20/99	33	639160	472	239763	327881	37.51%
11/21/99	28	584360	440	224362	305532	38.39%
11/22/99	31	626580	477	243023	330595	38.79%
11/23/99	24	511960	385	195936	265982	38.27%
11/24/99	24	471660	378	192680	262295	40.85%
11/26/99	32	588540	467	237259	323024	40.31%
11/27/99	33	624520	493	250070	344492	40.04%
11/28/99	31	609440	481	245532	333540	40.29%
11/29/99	28	566080	440	225924	306473	39.91%
11/30/99	34	737840	516	263846	402521	35.76%
12/01/99	35	770640	521	263213	417606	34.16%
12/02/99	31	653940	468	238547	340102	36.48%
12/03/99	27	557240	433	220440	299588	39.56%
12/04/99	23	481420	378	192639	261670	40.01%
12/05/99	29	642400	496	254914	345658	39.68%
12/06/99	30	619980	494	250525	339579	40.41%
12/07/99	14	280520	223	114612	155811	40.86%

*TOTAL :

1356

27292890

20243

10315517

14524412

37.80%

500# Basis = 20,631 Bales

2000
BRITZ GIN PARTNERSHIP II (BRTZG-00) 12/19/03
Ginning Summary

Trailer/Modules: «BOTH»

Date	Loads	Net weight	Bales	Bale Wt	Seed Wt	Turnout
10/10/00	8	172500	111	58794	95915	34.08%
10/11/00	7	147940	100	50065	81398	33.84%
10/12/00	9	185680	126	64658	103009	34.82%
10/13/00	9	200580	144	74190	106554	36.99%
10/14/00	10	213660	143	73884	115722	34.58%
10/15/00	8	168960	126	64442	92169	38.14%
10/16/00	12	268700	197	100888	145212	37.55%
10/17/00	25	525780	391	201537	273192	38.33%
10/18/00	26	602780	441	227334	300637	37.71%
10/19/00	28	603840	452	235638	295672	39.02%
10/20/00	25	568320	446	229676	283729	40.41%
10/21/00	27	581680	463	236772	294670	40.70%
10/22/00	31	598080	451	231823	300721	38.76%
10/23/00	26	502840	392	205365	253852	40.84%
10/24/00	23	434680	343	180024	213767	41.42%
10/25/00	21	429380	331	173530	214025	40.41%
10/26/00	23	457630	359	184887	230802	40.40%
10/27/00	28	595940	474	242331	298963	40.66%
10/28/00	26	559160	429	220282	278817	39.40%
10/29/00	19	338280	270	136073	169778	40.22%
10/30/00	24	497840	391	198168	242448	39.81%
10/31/00	29	602240	446	223852	314854	37.17%
11/01/00	29	613040	439	224573	310590	36.63%
11/02/00	31	663790	488	247490	333726	37.28%
11/03/00	29	559120	420	213488	285270	38.18%
11/04/00	29	635060	454	230862	323231	36.35%
11/05/00	27	567790	416	211026	290325	37.17%
11/06/00	33	689930	513	261331	351881	37.88%
11/07/00	19	387360	300	153008	195381	39.50%
11/08/00	29	569340	440	225775	284857	39.66%
11/09/00	34	663260	461	234830	345520	35.41%
11/10/00	31	686260	471	239766	360012	34.94%
11/11/00	30	582100	427	217577	306488	37.38%
11/12/00	30	565120	425	217325	293696	38.46%
11/13/00	27	572260	409	209548	292141	36.62%
11/14/00	28	609960	461	234604	316726	38.46%
11/15/00	22	478220	362	184690	247183	38.62%
11/16/00	23	482640	324	164973	266612	34.18%
11/17/00	31	662800	456	231927	361351	34.99%
11/18/00	30	660720	472	242020	337840	36.63%
11/19/00	31	659340	458	232640	341200	35.28%
11/20/00	33	686970	464	236748	363436	34.46%
11/21/00	31	662800	446	229272	348330	34.59%
11/22/00	28	598880	460	235906	309455	39.39%
11/24/00	28	586900	444	227875	305531	38.83%
11/25/00	33	628150	447	228325	326516	36.35%
11/26/00	30	595480	441	226607	312504	38.05%
11/27/00	32	645870	470	239171	337289	37.03%
11/28/00	33	649940	492	250918	337154	38.61%
11/29/00	33	690820	494	252453	367099	36.54%
11/30/00	31	726700	511	261359	374960	35.97%

BRITZ GIN PARTNERSHIP II (BRTZG-00) ²⁰⁰⁰ 12/19/03
Ginning Summary

Trailer/Modules: «BOTH»

Date	Loads	Net weight	Bales	Bale Wt	Seed Wt	Turnout
12/01/00	35	691820	489	247984	353319	35.85%
12/02/00	34	725140	497	253480	384361	34.96%
12/03/00	29	653620	476	241832	338873	37.00%
12/04/00	9	204110	161	81562	104318	39.96%
12/05/00	27	601740	455	230758	310233	38.35%
12/06/00	29	647110	497	255288	332532	39.45%
12/07/00	32	671640	518	264073	346065	39.32%
12/08/00	30	662860	507	258895	344603	39.06%
12/09/00	31	680640	511	260930	353250	38.34%
12/10/00	36	745460	538	271602	387837	36.43%
12/11/00	33	687320	540	272494	356019	39.65%
12/12/00	34	668340	530	268935	341295	40.24%
12/13/00	28	635960	490	248757	321575	39.12%
12/14/00	22	516040	378	191116	261473	37.04%
12/15/00	26	562420	416	211401	287656	37.59%
12/16/00	26	542360	391	198246	290638	36.55%
12/17/00	27	594740	442	224105	304721	37.68%
12/18/00	22	444440	343	172245	231062	38.76%
12/19/00	28	589220	440	222431	300366	37.75%
12/20/00	31	658280	480	242641	335890	36.86%
12/21/00	32	615460	481	244195	307973	39.68%
12/22/00	31	632780	466	235827	317529	37.27%
12/23/00	28	593340	435	220246	297798	37.12%
12/26/00	26	540580	382	193886	271203	35.87%
12/27/00	31	623700	468	236435	312312	37.91%
12/28/00	27	589280	435	218449	295650	37.07%
12/29/00	25	544900	394	198912	274241	36.50%
12/30/00	28	557900	446	225776	278634	40.47%
12/31/00	11	247320	191	97085	123647	39.25%
01/02/01	28	601260	431	218487	304058	36.34%
01/03/01	14	281760	207	105993	141900	37.62%
*TOTAL :	2149	45048650	33326	16994366	23143241	37.72%

500th Bales = 33,989 BALES



SA ID	PRIOR READ	CURRENT RE	NUM. DAYS	RS CD	STHRU PUT
MD01180205	10/11/1997	1/22/1998	103	GNR1	40099
MD01180205	1/22/1998	2/11/1998	20	GNR1	0
MD01180205	2/11/1998	5/13/1998	91	GNR1	0
MD01180205	5/13/1998	8/12/1998	91	GNR1	35610
MD01180205	8/12/1998	9/14/1998	33	GNR1	119
MD01180205	5/13/1998	9/14/1998	124	GNR1	-35729
MD01180205	5/13/1998	10/13/1998	153	GNR1	233
MD01180205	10/13/1998	12/10/1998	58	GNR1	41459
MD01180205	12/10/1998	1/13/1999	34	GNR1	5345
MD01180205	1/13/1999	2/11/1999	29	GNR1	517
MD01180205	2/11/1999	3/15/1999	32	GNR1	466

TO: TOM



GAS USAGE IN THE
THERMS 197-98

FROM BARY
263-5537

TO: TOM 3 PAGES



GCT. 14. 2003 2:36PM PACIFIC GAS ELECTRIC

"Old Britz Helm Gin Gas usage information"							
SA_ID	SERVICE ADDRESS	PRIOR READ DATE	CURRENT READ DATE	BILLING PERIOD	RS_CD	THERMS	GAS CHARGES
5733968005	NW NE 23 16 17	3/15/1999	4/13/1999	29	GNR1	286	\$171.74
5733968005	NW NE 23 16 17	4/13/1999	5/12/1999	29	GNR1	218	\$125.87
5733968005	NW NE 23 16 17	5/12/1999	6/11/1999	30	GNR1	132	\$85.45
5733968005	NW NE 23 16 17	6/11/1999	7/13/1999	32	GNR1	120	\$80.22
5733968005	NW NE 23 16 17	7/13/1999	8/13/1999	31	GNR1	113	\$77.73
5733968005	NW NE 23 16 17	8/13/1999	9/13/1999	31	GNR1	114	\$79.14
5733968005	NW NE 23 16 17	9/13/1999	10/12/1999	29	GNR1	105	\$77.73
5733968005	NW NE 23 16 17	10/12/1999	11/12/1999	31	GNR1	8,687	\$4,891.92
5733968005	NW NE 23 16 17	11/12/1999	12/14/1999	32	GNR1	15,984	\$9,304.10
5733968005	NW NE 23 16 17	12/14/1999	1/14/2000	31	GNR1	440	\$323.92
5733968005	NW NE 23 16 17	1/14/2000	2/14/2000	31	GNR1	398	\$296.15
5733968005	NW NE 23 16 17	2/14/2000	3/15/2000	30	GNR1	350	\$259.35
5733968005	NW NE 23 16 17	3/15/2000	4/13/2000	29	GNR1	234	\$166.42
5733968005	NW NE 23 16 17	4/13/2000	5/12/2000	29	GNR1	190	\$130.56
5733968005	NW NE 23 16 17	5/12/2000	6/14/2000	33	GNR1	145	\$105.83
5733968005	NW NE 23 16 17	6/14/2000	7/14/2000	30	GNR1	125	\$99.14
5733968005	NW NE 23 16 17	7/14/2000	8/14/2000	31	GNR1	126	\$107.05
5733968005	NW NE 23 16 17	8/14/2000	9/13/2000	30	GNR1	121	\$100.44
5733968005	NW NE 23 16 17	9/13/2000	10/12/2000	29	GNR1	518	\$415.51
5733968005	NW NE 23 16 17	10/12/2000	11/10/2000	29	GNR1	15,589	\$11,640.84



NO. 621 P. 1

SA_ID	SERVICE ADDRESS	PRIOR READ DATE	CURRENT READ DATE	BILLING PERIOD	RS_CD	THERMS	GAS CHARGES
5733968005	NW NE 23 16 17	7/15/2002	8/13/2002	29	GNR1	118	\$72.43
5733968005	NW NE 23 16 17	8/13/2002	9/12/2002	30	GNR1	120	\$77.72
5733968005	NW NE 23 16 17	9/12/2002	10/11/2002	29	GNR1	2,631	\$1,583.53
5733968005	NW NE 23 16 17	10/11/2002	11/12/2002	32	GNR1	19,354	\$11,775.34
5733968005	NW NE 23 16 17	11/12/2002	12/11/2002	29	GNR1	21,526	\$14,987.69
5733968005	NW NE 23 16 17	12/11/2002	1/11/2003	31	GNR1	15,549	\$11,969.34
5733968005	NW NE 23 16 17	1/11/2003	2/11/2003	31	GNR1	211	\$202.02
5733968005	NW NE 23 16 17	2/11/2003	3/14/2003	31	GNR1	198	\$191.97
5733968005	NW NE 23 16 17	3/14/2003	4/12/2003	29	GNR1	162	\$163.34
5733968005	NW NE 23 16 17	4/12/2003	5/13/2003	31	GNR1	130	\$109.15
5733968005	NW NE 23 16 17	5/13/2003	6/12/2003	30	GNR1	116	\$98.73
5733968005	NW NE 23 16 17	6/12/2003	7/14/2003	32	GNR1	114	\$106.29
5733968005	NW NE 23 16 17	7/14/2003	8/12/2003	29	GNR1	101	\$95.86
5733968005	NW NE 23 16 17	8/12/2003	9/11/2003	30	GNR1	103	\$101.04



SA_ID	SERVICE ADDRESS	PRIOR READ DATE	CURRENT READ DATE	BILLING PERIOD	RS_CD	THERMS	GAS CHARGES
5733968005	NW NE 23 16 17	11/10/2000	12/12/2000	32	GNR1	25,699	\$21,320.41
5733968005	NW NE 23 16 17	11/10/2000	12/12/2000	32	GNR1	0	\$376.26
5733968005	NW NE 23 16 17	12/12/2000	1/11/2001	30	GNR1	17,090	\$18,788.13
5733968005	NW NE 23 16 17	1/11/2001	2/12/2001	32	GNR1	371	\$662.92
5733968005	NW NE 23 16 17	2/12/2001	3/14/2001	30	GNR1	332	\$535.33
5733968005	NW NE 23 16 17	3/14/2001	4/12/2001	29	GNR1	222	\$305.11
5733968005	NW NE 23 16 17	4/12/2001	5/14/2001	32	GNR1	209	\$244.16
5733968005	NW NE 23 16 17	5/14/2001	6/13/2001	30	GNR1	136	\$147.04
5733968005	NW NE 23 16 17	6/13/2001	7/13/2001	30	GNR1	134	\$121.76
5733968005	NW NE 23 16 17	7/13/2001	8/13/2001	31	GNR1	140	\$129.01
5733968005	NW NE 23 16 17	8/13/2001	9/12/2001	30	GNR1	133	\$96.04
5733968005	NW NE 23 16 17	9/12/2001	10/11/2001	29	GNR1	119	\$68.43
5733968005	NW NE 23 16 17	10/11/2001	11/9/2001	29	GNR1	9,528	\$3,002.91
5733968005	NW NE 23 16 17	11/9/2001	12/12/2001	33	GNR1	25,163	\$12,193.99
5733968005	NW NE 23 16 17	12/12/2001	1/12/2002	31	GNR1	6,298	\$4,264.66
5733968005	NW NE 23 16 17	1/12/2002	2/12/2002	31	GNR1	487	\$343.61
5733968005	NW NE 23 16 17	2/12/2002	3/15/2002	31	GNR1	252	\$158.74
5733968005	NW NE 23 16 17	3/15/2002	4/12/2002	28	GNR1	174	\$111.01
5733968005	NW NE 23 16 17	4/12/2002	5/14/2002	32	GNR1	188	\$119.66
5733968005	NW NE 23 16 17	5/14/2002	6/13/2002	30	GNR1	139	\$89.15
5733968005	NW NE 23 16 17	6/13/2002	7/15/2002	32	GNR1	132	\$79.17



Appendix D:
AP-42 Natural Gas Combustion Emission factors



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 11. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. To convert from lb/10⁶ scf to kg/10⁶ m³, multiply by 16. Emission factors are based on an average natural gas higher heating value of 1,020 Btu/scf. To convert from lb/10⁶ 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 NO₂. 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 ₂ O (Uncontrolled)	2.2	E
N ₂ O (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 11. 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/10⁶ scf to kg/10⁶ m³, multiply by 16. To convert from lb/10⁶ 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.

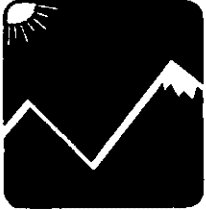
VOC = Volatile Organic Compounds.

^b Based on approximately 100% conversion of fuel carbon to CO₂. $CO_2[\text{lb}/10^6 \text{ scf}] = (3.67) (\text{CON}) (\text{C})(\text{D})$, where CON = fractional conversion of fuel carbon to CO₂, C = carbon content of fuel by weight (0.76), and D = density of fuel, $4.2 \times 10^4 \text{ lb}/10^6 \text{ scf}$.

^c All PM (total, condensable, 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 PM₁₀, PM_{2.5} or PM₁ emissions. Total PM is the sum of the filterable PM and condensable PM. Condensable 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 SO₂.

Assumes sulfur content is natural gas of 2,000 grains/10⁶ scf. The SO₂ emission factor in this table can be converted to other natural gas sulfur contents by multiplying the SO₂ emission factor by the ratio of the site-specific sulfur content (grains/10⁶ scf) to 2,000 grains/10⁶ scf.



San Joaquin Valley
Air Pollution Control District

RH

FEB 13 2004

Robert Glassman
Britz Ag Finance Company, Inc
P. O. Box 9050
Fresno, CA 93790

**Re: Notice of Preliminary Decision - Emission Reduction Credits
Project Number: C-1032163**

Dear Mr. Glassman:

Enclosed for your review and comment is the District's analysis of Britz Ag Finance Company, Inc's application for Emission Reduction Credits (ERCs) resulting from shutdown of the cotton gin, at 16423 W. Kamm Avenue in Helm, CA. The quantity of ERCs proposed for banking is 19,720 lb-PM10/qtr; 381 lb-NOx/qtr; 320 lb CO/qtr; 21 lb VOC/qtr; and 11 lb SOx/qtr for the fourth quarter.

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. Renald Harris of Permit Services at (559) 230-5890.

Sincerely,


for Seyed Sadredin
Director of Permit Services

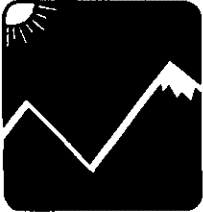
SS:rh
Enclosures
c: David Warner, Permit Services Manager

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 East Gettysburg Avenue
Fresno, CA 93726-0244
(559) 230-6000 • FAX (559) 230-6061
www.valleyair.org

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



San Joaquin Valley
Air Pollution Control District

FEB 13 2004

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

Re: Notice of Preliminary Decision - Emission Reduction Credits
Project Number: C-1032163

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Britz Ag Finance Company, Inc's application for Emission Reduction Credits (ERCs) resulting from shutdown of the cotton gin, at 16423 W. Kamm Avenue in Helm, CA. The quantity of ERCs proposed for banking is 19,720 lb-PM10/qtr; 381 lb-NOx/qtr; 320 lb CO/qtr; 21 lb VOC/qtr; and 11 lb SOx/qtr for the fourth quarter.

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. Renald Harris of Permit Services at (559) 230-5890.

Sincerely,

for Seyed Sadredin
Director of Permit Services

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

David L. Crow
Executive Director/Air Pollution Control Officer

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San Joaquin Valley
Air Pollution Control District

FEB 13 2004

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

**Re: Notice of Preliminary Decision - Emission Reduction Credits
Project Number: C-1032163**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of Britz Ag Finance Company, Inc's application for Emission Reduction Credits (ERCs) resulting from shutdown of the cotton gin, at 16423 W. Kamm Avenue in Helm, CA. The quantity of ERCs proposed for banking is 19,720 lb-PM10/qtr; 381 lb-NOx/qtr; 320 lb CO/qtr; 21 lb VOC/qtr; and 11 lb SOx/qtr for the fourth quarter.

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. Renald Harris of Permit Services at (559) 230-5890.

Sincerely,

for Seyed Sadredin
Director of Permit Services

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

David L. Crow
Executive Director/Air Pollution Control Officer

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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 Britz Ag Finance Company, Inc for shutdown of the cotton gin, at 16423 W. Kamm Avenue in Helm, CA. The quantity of ERCs proposed for banking is 19,720 lb-PM10/qtr; 381 lb-NOx/qtr; 320 lb CO/qtr; 21 lb VOC/qtr; and 11 lb SOx/qtr for the fourth quarter.

The analysis of the regulatory basis for these proposed actions, Project #C-1032163, 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
EVALUATION**
Project #C-1032163

Engineer: Renald Harris
Date: January 29, 2004

Britz Ag Finance Company, Inc
PO Box 9050
Fresno, CA 93790

Contact Name: Mr. Robert Glassman
Phone: (559) 448-8000

Date Application Received: December 22, 2003
Date Deemed Complete: December 29, 2003

I. Summary:

The primary business of this facility is ginning cotton. The applicant submitted an application to bank the emission reduction credits (ERCs) from the shutdown of a cotton gin. Copy of the surrendered permit is included in Appendix A of this report.

Per the applicant, the ERCs will be issued to Britz Ag Finance Company, Inc.

II. Applicable Rules:

Rule 2301 - Emission Reduction Credit Banking (Adopted September 19, 1991; Amended March 11, 1992; Amended December 17, 1992)

III. Location of Reduction:

Britz Inc Gin
16423 W. Kamm Avenue
Helm, CA

IV. Method of Generating Reductions:

The emissions reduction is generated by the shutdown of permitted cotton ginning operation. The 1D-3D cyclone collectors controlled the facility's PM10 emissions. Their gin was limited by permit condition to ginning rate of 550 bales per day. The applicant surrendered the PTO on December 22, 2003 for this location in concurrence with the submittal of the ERC application.

V. Calculations:

A. Assumptions and Emission Factors

- The PTO specifies an emission factor of 0.835 lb-PM₁₀/bale. In comparison, the California Cotton Ginners Association (CCGA) Handbook specifies an average PM₁₀ emission factor for Saw type gin with 1D-3D cyclones to be 0.91 lb-PM₁₀/bale (see Appendix B). Therefore, the lower emission factor of 0.835 lb-PM₁₀/bale from the PTO will be used.
- The gin equipment also included burners providing heated air to control the moisture content of the cotton. These burners were fired on natural gas and ERCs are also requested from their shutdown. The PTO does not indicate natural gas combustion emission factors; so AP-42 emission factors will be used.
- Annual emissions will be rounded to the nearest pound in accordance with the District Policy.
- The exhaust from the burners flows through the process air and exits at the cyclone collectors, in this case, PM₁₀ emissions exhausted from the cyclones include emissions from both the burners and the ginning process. Therefore, the ginning PM₁₀ emissions are not added to those calculated for the burners to determine the HAE.
- Bales are standardized to 500 lb/bale.

B. Baseline Period Determination and Data

The baseline period consists of two years immediately preceding the date of reduction, or at least two consecutive years within five years prior to the ERC application, if they are more representative of "normal source operation" (Rule 2201, Section 3.8).

According to District Rule 2201, the date of shutdown for permitted sources shall be the date of surrender of the operating permits, unless previously determined by the District to be shutdown. Even though the applicant noted that the gin last operated during the 2002-ginning season, the permit was not surrendered until December 22, 2003, so the five year period shall extend back to October 18, 1999. The applicant has provided the historical ginning records (see Appendix B) from 1999 to 2002 as summarized in Table 2 and provided as part of the ERC application.

Britz Ag Finance Company, Inc
 Facility Number: C-978
 Project Number: 1032163

Season Start Date	Season End Date	Bales Produced (500 lb bales)		Natural Gas Use (therms)	
		4 th Qtr	1 st Qtr	4 th Qtr	1 st Qtr
10/18/99	12/07/99	20,243	0	19,380	0
10/10/00	01/03/01	32,688	638	52,148	1,139
10/15/01	12/17/01	22,109	0	34,595	0
10/03/02	12/23/02	30,372	0	48,218	0
10/01/03	12/22/03	0	0	0	0
Normal Source Operation (Average '99 - '02)		26,353	160	38,586	285
Average '01 & '02		26,241	0	41,407	0

Based on the ginning records provided, normal operation is represented by the four operating years 1999-2002. The year 2003 was one of non-operation, which does not appear to be normal. The average throughput from the last two consecutive years of operations within five years prior to the ERC application (2001 and 2002) is 26,241 bales/year. This baseline period average is the closest to the normal source operation (1999 – 2002) average of 26,353 bales/year. The baling rates in Table 1 are based upon daily records (see Appendix C).

The same 2001/2002-baseline period will be used for historic fuel usage.

The gin equipment also included natural gas-fired dryers providing heated air to control the moisture content of the cotton.

All dryers are fired on natural gas. Emissions factors for natural gas combustion are from AP-42 (07/98) Tables 1.4-1, and 1.4-2 for small boilers (<100 MMBtu/hr), uncontrolled (see Appendix D), except for SO_x, which the SO_x emission factor will be based on the mass balance equation using 1.0 gr-S/100 ft³ (pursuant to PG&E standard for sulfur content):

$$SO_{X(natural\ gas)} (lb/MMBtu) = (1.0\ gr-S/100scf) \times (1lb/7000gr) \times (1scf/1000Btu) \times (10^6\ Btu/MMBtu) \times (2\ lb-SO_x/1\ lb-S)$$

$$SO_{X(natural\ gas)} (lb/MMBtu) = 0.0029\ lb/MMBtu$$

Britz Ag Finance Company, Inc
 Facility Number: C-978
 Project Number: 1032163

Pollutant	(lb/MMscf)	(lb/MMBtu)
NO _x	100	0.1000
SO _x	2.9	0.0029
CO	84	0.0840
VOC	5.5	0.0055

C. Historical Actual Emissions (HAE)

Historical Actual Emissions (HAE) are emissions having actually occurred and are calculated using process data and recognized emission factors, per Rule 2201, Section 3.23.

PM10

The HAE is calculated based on the emission factor discussed in section V.A of this evaluation and the average baling rate during the baseline period discussed in Section V.B.

$$\begin{aligned} \text{HAE for PM}_{10} \text{ (lb/4}^{\text{th}}\text{Qtr)} &= 0.835 \text{ lb-PM}_{10}\text{/bale} \times 26,241 \text{ bale/4}^{\text{th}}\text{Qtr} \\ &= 21,911 \text{ lb-PM}_{10}\text{/4}^{\text{th}}\text{Qtr} \end{aligned}$$

NO_x, CO, VOC, & SO_x

The HAE is calculated using average natural gas use during the baseline period shown in Table 1 of this evaluation, and the EPA's AP-42 emission factors for NO_x, CO, VOC for natural gas combustion and mass balance calculations for SO_x.

$$\begin{aligned} \text{Historical Natural Gas Usage (4}^{\text{th}}\text{ Qtr)} &= 41,407 \text{ therms/4}^{\text{th}}\text{Qtr} \\ \text{Total MMBtu} &= \text{total therms} \times (100 \text{ ft}^3\text{/therm}) \times (1000 \text{ Btu/ft}^3) \times (1 \text{ MMBtu/1,000,000 Btu}) \end{aligned}$$

$$\begin{aligned} &41,407 \text{ therms/4}^{\text{th}}\text{Qtr} \times (100 \text{ ft}^3\text{/therm}) \times (1000 \text{ Btu/ft}^3) \times (1 \text{ MMBtu/1,000,000 Btu}) \\ \text{Historical Natural Gas Usage (MMBtu/4}^{\text{th}}\text{Qtr)} &= 4,141 \text{ MMBtu/4}^{\text{th}}\text{Qtr} \end{aligned}$$

The AP-42 and mass balance emissions factors for natural gas combustion used in the following equation to calculate the HAE:

$$\begin{aligned} \text{HAE}_{\text{Natural Gas}} \text{ (lb/4}^{\text{th}}\text{Qtr)} &= \text{Historical Natural Gas Usage (MMBtu/4}^{\text{th}}\text{Qtr)} \\ &\times \text{Emission Factor (lb/MMBtu)} \end{aligned}$$

$$HAE_{NO_x} \text{ (lb/4}^{th}\text{Qtr)} = 4,141 \text{ MMBtu/4}^{th}\text{Qtr} \times 0.1000 \text{ lb/MMBtu} = 414 \text{ lb-NO}_x\text{/4}^{th}\text{Qtr}$$

$$HAE_{SO_x} \text{ (lb/4}^{th}\text{Qtr)} = 4,141 \text{ MMBtu/4}^{th}\text{Qtr} \times 0.0029 \text{ lb/MMBtu} = 12 \text{ lb-SO}_x\text{/4}^{th}\text{Qtr}$$

$$HAE_{CO} \text{ (lb/4}^{th}\text{Qtr)} = 4,141 \text{ MMBtu/4}^{th}\text{Qtr} \times 0.0840 \text{ lb/MMBtu} = 348 \text{ lb-CO/4}^{th}\text{Qtr}$$

$$HAE_{VOC} \text{ (lb/4}^{th}\text{Qtr)} = 4,141 \text{ MMBtu/4}^{th}\text{Qtr} \times 0.0055 \text{ lb/MMBtu} = 23 \text{ lb-VOC/4}^{th}\text{Qtr}$$

Pollutant	1 st Qtr (lb/qtr)	2 nd Qtr (lb/qtr)	3 rd Qtr (lb/qtr)	4 th Qtr (lb/qtr)
NO _x	0	0	0	414
SO _x	0	0	0	12
PM10	0	0	0	21,911
CO	0	0	0	348
VOC (non-methane)	0	0	0	23

D. Adjustments to HAE

Pursuant to Section 4.12.1 of Rule 2201, Historical Actual Emissions must be discounted for any emissions reductions proposed in the District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act.

The District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act does include cotton gins as part of the PM10 plan. A Best Available Control Measure (BACM) requirements have not been identify for the class and category of cotton ginner, but until clarification of control measure language to ensure that the control measure will be applied as needed to meet BACM; the most current Best Available Control Technology (BACT) guideline for cotton gins with natural gas-fired dryers should be used. Adjustment should be made for the control equipment and any emission factors correlating to that control equipment.

The District BACT Guideline 5.3.2 (Cotton Gin with Natural Gas-Fired Dryer, < 8 MMBtu/hr) requires NO_x to be 0.1 lb/MMBtu, which is the same as AP-42, emission factors for Natural Gas Combustion, and so no change. As for PM₁₀, the control measure required is 1D-3D cyclones, which is the same control measure used by the facility (see PTO conditions in Appendix A). Based on the facility meeting the requirements of BACT Guideline 5.3.2, then no additional adjustment to HAE for the control measure or for the District Air Quality Plan at this time.

Emissions Adjusted for Rule 4202: Particulate Matter – Emission Rate

Rule 4202 (Particulate Matter – Emission Rate), Section 4.1 limits emissions based on process weight. The process rate in a cotton gin varies from emission point to emission point as the trash and seeds are removed from the lint, decreasing the weight. The rate starts at 1,500 lb of seed cotton per bale of finished cotton and drops to about 500 lb of lint cotton per bale of finished cotton.

Below, emissions are checked at unloading, lint cleaning #1, lint cleaning #2 and the battery condenser.

1. Unloading:

$$\begin{aligned} \text{For Process Rate (P)} &= 23 \text{ bales/hr} \times 1,500 \text{ lb/bale} \\ &= 34,500 \text{ lb/hr of seed cotton} \\ &= 17.25 \text{ tons/hr} \end{aligned}$$

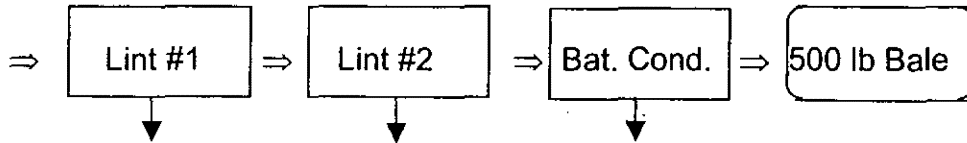
The emissions limit (E), per Rule 4202, equals:

$$\begin{aligned} E &= 3.59 \times P^{0.62} \\ &= 3.59 \times (17.25)^{0.62} \\ &= 20.98 \text{ lb-PM/hour} \end{aligned}$$

The emissions factor for unloading is 0.11 lb-PM₁₀/bale (1D-3D cyclone), per Cotton Gin Emission Factors Summary Table (see Appendix E). Based on this emissions factor, the emission rate for unloading is 2.53 lb-PM₁₀/hr (23 bales/hr x 0.11 lb-PM₁₀/bale). Assuming 50% of PM is PM₁₀, this is equivalent to a PM emission rate of 5.1 lb-PM/hr. Therefore, the PM emissions are within allowable limits.

2. Lint Cleaner #1:

The District has contacted the California Cotton Ginners Association and requested the information of the process weights. CCGA has stated that the association does not know the processing weights at the specified points. The process weights for these emission points were therefore back-calculated by determining the weight of material removed by each process point (between the 500 lb finished bale and the specific emission point) and adding those values to the 500 pound bale. The District's calculations will be assumed to be representative of the actual process weights, based on assumed cyclone control efficiencies and known emission rates.



EFs: (0.10 lb PM₁₀/bale) (0.03 lb PM₁₀/bale) (0.03 lb PM₁₀/bale)

Assuming a 70% control efficiency for the cyclones and 50% of PM emissions are PM₁₀, we can determine the weight of material removed by the battery condenser, the lint cleaner #2 and the lint cleaner #1:

Battery Condenser:

Let X = lbs PM/bale (pre battery condenser) and assuming 70% control efficiency of the cyclone

$$\begin{aligned}
 \text{Mass Balance: } X(1-0.70) &= 0.06 \text{ lb PM/bale} \\
 &= 0.06 \text{ lb PM/bale} \div 0.30 \\
 X &= 0.2 \text{ lbs PM/bale}
 \end{aligned}$$

Lint Cleaner #2:

$$\begin{aligned}
 0.03 \text{ lb PM}_{10}/\text{bale} &=> 0.06 \text{ lb PM/bale} \div 0.30 \\
 X &= 0.2 \text{ lbs PM/bale}
 \end{aligned}$$

Lint Cleaner #1:

$$\begin{aligned}
 0.10 \text{ lb PM}_{10}/\text{bale} &=> 0.2 \text{ lb PM/bale} \div 0.30 \\
 X &= 0.67 \text{ lbs PM/bale}
 \end{aligned}$$

Therefore, the process weight of the bale when it entered lint cleaner #1 was ≈ 501.1 lbs ($500 + 0.2 + 0.2 + 0.67$) and approximately 0.2 pounds of material was removed by lint cleaner #1 before entering lint cleaner #2, making the process weight ≈ 500.9 lbs, and the battery condenser process weight is approximately 500.8 lbs since approximately 0.06 pounds of material is removed by lint cleaner #2.

Lint Cleaner #1:

$$\begin{aligned}\text{For Process Rate (P)} &= 23 \text{ bales/hr} \times 501.1 \text{ lb/bale} \\ &= 11,525 \text{ lb/hr of seed cotton} \\ &= 5.76 \text{ tons/hr}\end{aligned}$$

The emissions limit (E), per Rule 4202, equals:

$$\begin{aligned}E &= 3.59 \times P^{0.62} \\ &= 3.59 \times (5.76)^{0.62} \\ &= 10.63 \text{ lb-PM/hour}\end{aligned}$$

The emissions factor for the #1 Lint Cleaner is 0.1 lb PM₁₀/bale (1D-3D), based on source test information from similar gins, as compiled in the Cotton Gin Emission Factors summary tables. Based on this emissions factor, the emission rate for this lint cleaner condenser is 2.3 lb-PM₁₀/hr. Assuming 50% of PM is PM₁₀, this is equivalent to a PM emission rate of 4.6 lb-PM/hr. Therefore, the PM emissions are within the allowable limits, and no adjustment is necessary for the #1 lint cleaner.

3. Lint Cleaner #2:

$$\begin{aligned}\text{For Process Rate (P)} &= 23 \text{ bales/hr} \times 500.9 \text{ lb/bale} \\ &= 11,521 \text{ lb/hr of seed cotton} \\ &= 5.76 \text{ tons/hr}\end{aligned}$$

The emissions limit (E), per Rule 4202, equals:

$$\begin{aligned}E &= 3.59 \times P^{0.62} \\ &= 3.59 \times (5.76)^{0.62} \\ &= 10.63 \text{ lb-PM/hour}\end{aligned}$$

The emissions factor for the #2 Lint Cleaner is 0.03 lb PM₁₀/bale, per Cotton Gin Emission Factors summary tables. Based on this emissions factor, the emission rate for this lint cleaner condenser is 0.69 lb-PM₁₀/hr. Assuming 50% of PM is PM₁₀, this is equivalent to a PM emission rate of 1.38 lb-PM/hr. Therefore, the PM emissions are within the allowable limits, and no adjustment is necessary for the #2 lint cleaner.

4. **Battery Condenser:**
For Process Rate (P) = 23 bales/hr x 500.8 lb/bale
= 11,518 lb/hr of seed cotton
= 5.76 tons/hr

The emissions limit (E), per Rule 4202, equals:

$$\begin{aligned} E &= 3.59 \times P^{0.62} \\ &= 3.59 \times (5.76)^{0.62} \\ &= 10.63 \text{ lb-PM/hour} \end{aligned}$$

The emissions factor for the battery condenser for saw type gins with 1D-3D cyclone is 0.03 lb-PM₁₀/bale, per Cotton Gin Emission Factors Summary Table (see Appendix E). Based on this emissions factor, the emission rate for the battery condenser is 0.69 lb-PM₁₀/hr. Assuming 50% of PM is PM₁₀, this is equivalent to a PM emission rate of 1.38 lb-PM/hr. Therefore, the PM emissions are within the allowable limits.

E. Actual Emissions Reductions (AER)

Per Rule 2201, Section 4.12, the Actual Emissions Reductions due to shutdown of an emissions unit is equal to the HAE minus PE2.

$$AER = HAE - PE2$$

$$HAE = (\text{for the permit unit prior to shutdown}) = 21,911 \text{ lb-PM}_{10}/\text{year}$$

$$PE2 = (\text{for the permit unit after shutdown}) = 0 \text{ lb-PM}_{10}/\text{year}$$

$$AER = 21,911 \text{ lb-PM}_{10}/\text{year} - 0 \text{ lb-PM}_{10}/\text{year}$$

$$AER = 21,911 \text{ lb-PM}_{10}/\text{year}$$

F. Air Quality Improvement Deduction

The air quality improvement deduction per Rule 2201, Section 4.12.1, is 10% of the Actual Emissions Reductions.

G. Increases in Permitted Emissions (IPE)

No IPE is associated with this project.

H. Bankable Emissions Reductions Credits

The bankable emissions reduction credits, presented in Table 4, are determined by subtraction of the Air Quality Improvement Deduction (discussed in Section V.F) from the AER. The emission reductions occurred in the fourth quarter (see throughput records in Section V.B. Table 1).

Pollutant	1 st Qtr (lb/qtr)	2 nd Qtr (lb/qtr)	3 rd Qtr (lb/qtr)	4 th Qtr (lb/qtr)
NO _x	0	0	0	373
SO _x	0	0	0	11
PM ₁₀	0	0	0	19,720
CO	0	0	0	313
VOC	0	0	0	21

VI. Compliance:

To comply with the definition of Actual Emissions Reductions (Rule 2201, Section 3.2.1), the reductions must be:

A. Real

The emissions reductions were generated by the shutdown of the ginning equipment. The emissions reductions were calculated from actual historic production data and recognized emission factors. The emission factor of 0.835 lb-PM₁₀/bale, based on the PTO emission limit, is conservative. Based on past source tests of similarly controlled gins, actual emission rates were likely about 0.91 lb-PM₁₀/bale.

Therefore, the reductions are real.

B. Enforceable

The PTO for this facility has been surrendered and the gin cannot be operated without a valid PTO. Therefore, the reductions are enforceable.

C. Quantifiable

Reduction amounts were calculated from historic process throughput data, and methods according to District Rule 2201. Therefore, the reductions are quantifiable.

D. Permanent

The gin has been shutdown, and the PTO has been surrendered. Further operation requires an application to the District. In addition, the other active gins owned and operated by Britz, Inc have PTO baling limits and would require NSR review to increase production above currently permitted levels. Therefore, the reductions are permanent.

E. Surplus

Shutdown of the gin was voluntary and not required by any law, rule, agreement, or regulation. These ERCs are not needed for their current or proposed operations.

We have also demonstrated (see Section V.D.) that none of the proposed reductions are required by future rules proposed by the District.

In addition, based on the expected emissions from a 1D-3D controlled gin, the actual emissions almost certainly exceed the permitted level of 0.835 lb-PM₁₀/bale. Because we used 0.835 lb-PM₁₀/bale in our calculations of AER, we have assured the banked ERCs are surplus of the permitted limits.

Therefore, the reductions are surplus.

F. Not used for the approval of an Authority to Construct or as offsets

The emission reduction credits generated by the shutdown of the cotton ginning operations were not used for the approval of any Authority to Construct or as offsets.

G. Timely submittal

According to Rule 2301, Section 3.11, the date of shutdown for permitted sources shall be the date of the surrender of the operating permits, unless the District determines that:

- 1) The unit has been removed or has fallen into an inoperable and unmaintained condition such that start-up would require an investment exceeding 50% of the current replacement cost; and
- 2) The owner cannot demonstrate to the satisfaction of the District that the owner intended to operate again.

The ERC application was received on December 22, 2003. On the same day, the applicant also agreed to surrender the PTO and permanently ceases operations at this location. Therefore, the application was submitted in a timely fashion.

Britz Ag Finance Company, Inc
Facility Number: C-978
Project Number: 1032163

VII. Recommendation:

I recommend based on the analysis above that Emission Reduction Credit Certificates be issued to Anderson Clayton Corporation for the following applicable amounts for the first and fourth quarters only.

ERCs	NO _x (lb)	SO _x (lb)	PM10 (lb)	CO (lb)	VOC (lb)
4th Quarter	373	11	19,720	313	21

Appendices:

Appendix A: PTO C-978-1-4

Appendix B: Historical Production Data

Appendix C: ERC Application

Appendix D: AP-42 Natural Gas Combustion Emission factors

Appendix E: Cotton Gin Emission Factors Summary Table

Appendix A: PTO C-978-1-4

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-978-1-4

EXPIRATION DATE: 08/31/2007

EQUIPMENT DESCRIPTION:

COTTON GIN WITH FOUR SAW-TYPE GIN STANDS, THREE STAGE PRE-CLEANING, OVERFLOW, FOUR 1ST & FOUR 2ND STAGE LINT CLEANERS, BATTERY CONDENSER, MOTES, & 9 MMBTU/HR NATURAL GAS-FIRED DRYING SYSTEM.

PERMIT UNIT REQUIREMENTS

1. Daily ginning rate shall not exceed 137.5 tons of baled cotton per day (550 bales/day, based on 500-pound bales). [District Rule 2201]
2. Annual ginning rate shall not exceed 9,500 tons of baled cotton per year (38,000 bales/year, based on 500-pound bales). [District Rule 2201]
3. Emissions of PM10 shall not exceed 3.34 pounds per ton of baled cotton (0.835 pounds per bale, based on 500-pound bales). [District Rule 2201]
4. 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]
5. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
7. 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]
8. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
9. Daily records of the number and weight of bales produced shall be maintained on site. Records shall be retained for at least two years and shall be made available to the District staff upon request. [District Rule 1070]
10. Emissions from the wagon suction fans shall be controlled by two 48" 1D-3D cyclone collectors. [District Rule 2201]
11. Emissions from the trash fan shall be controlled by two 42" 1D-3D cyclone collectors. [District Rule 2201]
12. Emissions from the #1 moist air fan shall be controlled by two 42" 1D-3D cyclone collectors. [District Rule 2201]
13. Emissions from the #2 moist air fan shall be controlled by two 42" 1D-3D cyclone collectors. [District Rule 2201]
14. Emissions from the #3 moist air fan shall be controlled by two 42" 1D-3D cyclone collectors. [District Rule 2201]
15. Emissions from the overflow separator shall be controlled by two 42" 1D-3D cyclone collectors. [District Rule 2201]
16. Emissions from the 1st stage lint cleaners shall be controlled by four 54" 1D-3D cyclone collectors. [District Rule 2201]
17. Emissions from the 2nd stage lint cleaners shall be controlled by four 54" 1D-3D cyclone collectors. [District Rule 2201]
18. Emissions from the battery condenser shall be controlled by three 66" 1D-3D cyclone collectors. [District Rule 2201]
19. Emissions from the mote fans shall be controlled by one 68" 1D-3D cyclone collectors. [District Rule 2201]
20. Emissions from the motes transfer fan shall be controlled by one 28" 1D-3D cyclone collectors. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

21. Emissions from the mote cleaner trash fan shall be controlled by one 30" 1D-3D cyclone collectors. [District Rule 2201]

These terms and conditions are part of the Facility-wide Permit to Operate.

Appendix B: Historical Production Data

1999
BRITZ GIN PARTNERSHIP II (BRITZGIN) 12/19/03
Ginning Summary

Trailer/Modules: «BOTH»

Date	Loads	Net weight	Bales	Bale Wt	Seed Wt	Turnout
10/18/99	12	238560	170	86539	122332	36.28%
10/19/99	18	340980	252	127912	175217	37.51%
10/20/99	21	385400	288	147305	199614	38.22%
10/21/99	19	379340	293	150440	198095	39.66%
10/22/99	14	285940	209	106138	147201	37.12%
10/23/99	29	557880	415	214280	306678	38.41%
10/24/99	17	341860	260	131566	185864	38.49%
10/25/99	11	213880	162	82641	114768	38.64%
10/26/99	23	450060	333	169702	242923	37.71%
10/27/99	23	421420	309	157171	233986	37.30%
10/28/99	25	493280	365	186353	270737	37.78%
10/29/99	25	505280	375	192016	261037	38.00%
10/30/99	33	683840	456	232923	391686	34.06%
10/31/99	35	709920	519	265763	380727	37.44%
11/01/99	21	388880	297	149801	201017	38.52%
11/02/99	25	495600	353	179482	276654	36.22%
11/03/99	28	583520	406	207596	325931	35.58%
11/04/99	27	512000	376	192128	268110	37.53%
11/05/99	32	591600	406	207066	321741	35.00%
11/06/99	33	657640	467	238907	358055	36.33%
11/07/99	29	577700	463	235220	288697	40.72%
11/08/99	25	487940	382	193260	244317	39.61%
11/09/99	23	482120	351	178851	248749	37.10%
11/10/99	30	605580	457	231475	304939	38.22%
11/11/99	30	642740	462	237295	336084	36.92%
11/12/99	32	646020	464	235955	314160	36.52%
11/13/99	37	761160	496	253240	402960	33.27%
11/14/99	33	663550	466	236352	335574	35.62%
11/15/99	31	638180	490	248954	329608	39.01%
11/16/99	35	718220	525	267523	385695	37.25%
11/17/99	31	610060	461	233596	321408	38.29%
11/18/99	29	605980	449	228214	317550	37.66%
11/19/99	33	650480	504	256568	349949	39.44%
11/20/99	33	639160	472	239763	327881	37.51%
11/21/99	28	584360	440	224362	305532	38.39%
11/22/99	31	626580	477	243023	330595	38.79%
11/23/99	24	511960	385	195936	265982	38.27%
11/24/99	24	471660	378	192680	262295	40.85%
11/26/99	32	588540	467	237259	323024	40.31%
11/27/99	33	624520	493	250070	344492	40.04%
11/28/99	31	609440	481	245532	333540	40.29%
11/29/99	28	566080	440	225924	306473	39.91%
11/30/99	34	737840	516	263846	402521	35.76%
12/01/99	35	770640	521	263213	417606	34.16%
12/02/99	31	653940	468	238547	340102	36.48%
12/03/99	27	557240	433	220440	299588	39.56%
12/04/99	23	481420	378	192639	261670	40.01%
12/05/99	29	642400	496	254914	345658	39.68%
12/06/99	30	619980	494	250525	339579	40.41%
12/07/99	14	280520	223	114612	155811	40.86%

*TOTAL : 1356 27292890 20243 10315517 14524412 37.80%

500# Bales = 20,631 Bales

BRITZ GIN PARTNERSHIP II (BRITZG-00) ²⁰⁰⁰ 12/19/03
Ginning Summary

Trailer/Modules: «BOTH»

Date	Loads	Net weight	Bales	Bale Wt	Seed Wt	Turnout
10/10/00	8	172500	111	58794	95915	34.08%
10/11/00	7	147940	100	50065	81398	33.84%
10/12/00	9	185680	126	64658	103009	34.82%
10/13/00	9	200580	144	74190	106554	36.99%
10/14/00	10	213660	143	73884	115722	34.58%
10/15/00	8	168960	126	64442	92169	38.14%
10/16/00	12	268700	197	100888	145212	37.55%
10/17/00	25	525780	391	201537	273192	38.33%
10/18/00	26	602780	441	227334	300637	37.71%
10/19/00	28	603840	452	235638	295672	39.02%
10/20/00	25	568320	446	229676	283729	40.41%
10/21/00	27	581680	463	236772	294670	40.70%
10/22/00	31	598080	451	231823	300721	38.76%
10/23/00	26	502840	392	205365	253852	40.84%
10/24/00	23	434680	343	180024	213767	41.42%
10/25/00	21	429380	331	173530	214025	40.41%
10/26/00	23	457630	359	184887	230802	40.40%
10/27/00	28	595940	474	242331	298963	40.66%
10/28/00	26	559160	429	220282	278817	39.40%
10/29/00	19	338280	270	136073	169778	40.22%
10/30/00	24	497840	391	198168	242448	39.81%
10/31/00	29	602240	446	223852	314854	37.17%
11/01/00	29	613040	439	224573	310590	36.63%
11/02/00	31	663790	488	247490	333726	37.28%
11/03/00	29	559120	420	213488	285270	38.18%
11/04/00	29	635060	454	230862	323231	36.35%
11/05/00	27	567790	416	211026	290325	37.17%
11/06/00	33	689930	513	261331	351881	37.88%
11/07/00	19	387360	300	153008	195381	39.50%
11/08/00	29	569340	440	225775	284857	39.66%
11/09/00	34	663260	461	234830	345520	35.41%
11/10/00	31	686260	471	239766	360012	34.94%
11/11/00	30	582100	427	217577	306488	37.38%
11/12/00	30	565120	425	217325	293696	38.46%
11/13/00	27	572260	409	209548	292141	36.62%
11/14/00	28	609960	461	234604	316726	38.46%
11/15/00	22	478220	362	184690	247183	38.62%
11/16/00	23	482640	324	164973	266612	34.18%
11/17/00	31	662800	456	231927	361351	34.99%
11/18/00	30	660720	472	242020	337840	36.63%
11/19/00	31	659340	458	232640	341200	35.28%
11/20/00	33	686970	464	236748	363436	34.46%
11/21/00	31	662800	446	229272	348330	34.59%
11/22/00	28	598880	460	235906	309455	39.39%
11/24/00	28	586900	444	227875	305531	38.83%
11/25/00	33	628150	447	228325	326516	36.35%
11/26/00	30	595480	441	226607	312504	38.05%
11/27/00	32	645870	470	239171	337289	37.03%
11/28/00	33	649940	492	250918	337154	38.61%
11/29/00	33	690820	494	252453	367099	36.54%
11/30/00	31	726700	511	261359	374960	35.97%

2000
BRITZ GIN PARTNERSHIP II (BRTZG-00) 12/19/03
Ginning Summary

Trailer/Modules: «BOTH»

Date	Loads	Net weight	Bales	Bale Wt	Seed Wt	Turnout
12/01/00	35	691820	489	247984	353319	35.85%
12/02/00	34	725140	497	253480	384361	34.96%
12/03/00	29	653620	476	241832	338873	37.00%
12/04/00	9	204110	161	81562	104318	39.96%
12/05/00	27	601740	455	230758	310233	38.35%
12/06/00	29	647110	497	255288	332532	39.45%
12/07/00	32	671640	518	264073	346065	39.32%
12/08/00	30	662860	507	258895	344603	39.06%
12/09/00	31	680640	511	260930	353250	38.34%
12/10/00	36	745460	538	271602	387837	36.43%
12/11/00	33	687320	540	272494	356019	39.65%
12/12/00	34	668340	530	268935	341295	40.24%
12/13/00	28	635960	490	248757	321575	39.12%
12/14/00	22	516040	378	191116	261473	37.04%
12/15/00	26	562420	416	211401	287656	37.59%
12/16/00	26	542360	391	198246	290638	36.55%
12/17/00	27	594740	442	224105	304721	37.68%
12/18/00	22	444440	343	172245	231062	38.76%
12/19/00	28	589220	440	222431	300366	37.75%
12/20/00	31	658280	480	242641	335890	36.86%
12/21/00	32	615460	481	244195	307973	39.68%
12/22/00	31	632780	466	235827	317529	37.27%
12/23/00	28	593340	435	220246	297798	37.12%
12/26/00	26	540580	382	193886	271203	35.87%
12/27/00	31	623700	468	236435	312312	37.91%
12/28/00	27	589280	435	218449	295650	37.07%
12/29/00	25	544900	394	198912	274241	36.50%
12/30/00	28	557900	446	225776	278634	40.47%
12/31/00	11	247320	191	97085	123647	39.25%
01/02/01	28	601260	431	218487	304058	36.34%
01/03/01	14	281760	207	105993	141900	37.62%
*TOTAL :	2149	45048650	33326	16994366	23143241	37.72%

500th Bales = 33,989 BALES

2001
BRITZ GIN PARTNERSHIP II (BRTZG-01) 12/19/03
Ginning Summary

Trailer/Modules: «BOTH»

Date	Loads	Net weight	Bales	Bale Wt	Seed Wt	Turnout
10/15/01	7	133100	101	49977	68412	37.55%
10/16/01	8	166200	120	61702	84760	37.13%
10/17/01	16	288540	213	108585	147149	37.63%
10/18/01	16	291660	211	107176	148744	36.75%
10/19/01	18	345680	252	129355	178458	37.42%
10/20/01	25	523660	378	193622	272124	36.97%
10/21/01	29	581060	429	218198	299328	37.55%
10/22/01	21	412000	303	155125	212170	37.65%
10/23/01	25	511680	380	192403	263506	37.60%
10/24/01	21	454300	328	166069	233957	36.55%
10/25/01	18	392220	286	145270	201985	37.04%
10/26/01	24	480340	356	178686	247364	37.20%
10/27/01	29	562320	421	212620	289520	37.81%
10/28/01	27	522040	390	197949	268838	37.92%
10/29/01	23	476060	348	177871	245160	37.36%
10/30/01	20	437160	312	158171	226794	36.18%
10/31/01	21	425440	315	160495	219526	37.72%
11/01/01	30	623480	453	230355	319477	36.95%
11/02/01	31	632980	448	227646	325973	35.96%
11/03/01	30	600120	430	219209	309047	36.53%
11/04/01	22	474580	340	172987	244916	36.45%
11/05/01	29	590820	434	221812	304775	37.54%
11/06/01	30	594240	433	221302	305134	37.24%
11/07/01	31	589660	413	213292	303871	36.17%
11/08/01	30	624300	430	223502	325398	35.80%
11/09/01	30	650580	464	238486	335053	36.66%
11/10/01	24	547360	385	196875	281877	35.97%
11/11/01	14	296580	202	103593	152733	34.93%
11/12/01	17	376160	260	132459	193713	35.21%
11/13/01	17	367740	263	132843	189378	36.12%
11/14/01	22	447020	323	164644	230209	36.83%
11/15/01	26	511600	351	180432	263463	35.27%
11/16/01	21	419840	309	158473	216054	37.75%
11/17/01	22	455900	339	171923	234778	37.71%
11/18/01	20	433540	308	157481	223264	36.32%
11/19/01	22	463695	329	168293	238794	36.29%
11/20/01	22	471280	337	172726	242482	36.65%
11/21/01	20	433580	310	158181	223289	36.48%
11/23/01	22	454300	332	169563	233956	37.32%
11/24/01	24	488300	362	183906	251545	37.66%
11/25/01	21	398600	293	148513	207262	37.26%
11/26/01	21	440760	319	163348	226655	37.06%
11/27/01	25	508520	343	173620	261877	34.14%
11/28/01	29	593055	430	220519	296839	37.18%
11/29/01	23	543120	377	191964	275396	35.34%
11/30/01	26	584020	430	220384	292745	37.74%
12/01/01	26	594200	428	216919	297100	36.51%
12/02/01	28	641080	427	219965	327173	34.31%
12/03/01	27	611240	376	191825	317178	31.38%
12/04/01	26	595040	408	207040	299835	34.79%
12/05/01	22	480440	346	175188	243615	36.46%

BRITZ GIN PARTNERSHIP II (BRTZG-01) 12/19/03
Ginning Summary

Trailer/Modules: «BOTH»

Date	Loads	Net weight	Bales	Bale Wt	Seed Wt	Turnout
12/06/01	30	631600	471	237802	322113	37.65%
12/07/01	25	515060	391	197976	262643	38.44%
12/08/01	26	543340	394	202845	277096	37.33%
12/09/01	26	570260	421	215277	290821	37.75%
12/10/01	22	479120	356	180530	244348	37.68%
12/11/01	20	417460	309	158903	213215	38.06%
12/12/01	27	520960	375	192535	268291	36.96%
12/13/01	27	589980	414	211374	303495	35.83%
12/14/01	23	494460	342	174624	254645	35.32%
12/15/01	27	552220	389	198993	284389	36.04%
12/16/01	28	566400	399	203386	291689	35.91%
12/17/01	18	388080	273	139995	199856	36.07%
*TOTAL :	1477	30810130	22109	11276782	15815250	36.60%

500th Basis = 22554 Bales

2002
BRITZ GIN PARTNERSHIP II (BRTZG-02) 12/19/03
Ginning Summary

Trailer/Modules: «BOTH»

Date	Loads	Net weight	Bales	Bale Wt	Seed Wt	Turnout
10/03/02	12	261940	184	95134	135814	36.32%
10/04/02	11	255220	177	92560	132711	36.27%
10/05/02	12	270660	187	96887	140737	35.80%
10/06/02	12	288020	195	102248	149770	35.50%
10/07/02	19	401120	276	142898	208971	35.62%
10/08/02	21	443860	307	157476	230808	35.48%
10/09/02	29	598860	413	212805	311622	35.54%
10/10/02	30	632420	430	222532	334147	35.19%
10/11/02	35	601120	412	210976	317803	35.10%
10/12/02	30	625060	422	217828	331276	34.85%
10/13/02	28	585580	402	205517	308971	35.10%
10/14/02	28	581980	411	209116	301386	35.93%
10/15/02	27	538520	396	203958	275290	37.87%
10/16/02	23	459520	333	170403	234356	37.08%
10/17/02	22	448640	338	173423	229407	38.66%
10/18/02	22	499320	348	180663	257611	36.18%
10/19/02	31	627120	460	236704	331061	37.74%
10/20/02	25	491060	364	185748	250443	37.83%
10/21/02	24	489780	369	188324	250002	38.45%
10/22/02	29	629880	455	234618	321236	37.25%
10/23/02	25	516000	373	192424	263189	37.29%
10/24/02	30	652020	464	238859	332529	36.63%
10/25/02	27	628080	435	225071	320471	35.83%
10/26/02	25	579320	401	206050	301150	35.57%
10/27/02	28	655000	438	224957	339194	34.34%
10/28/02	29	615190	422	215903	319898	35.10%
10/29/02	32	682320	465	239305	354670	35.07%
10/30/02	33	696180	463	239908	365669	34.46%
10/31/02	35	724840	479	246810	379854	34.05%
11/01/02	36	718000	467	241165	374928	33.59%
11/02/02	30	654220	405	210726	346723	32.21%
11/03/02	34	698620	442	228623	370271	32.72%
11/04/02	34	746500	497	255448	395302	34.22%
11/05/02	35	783680	518	267670	415880	34.16%
11/06/02	32	710280	456	235826	376327	33.20%
11/07/02	23	541860	351	182853	287185	33.75%
11/08/02	30	677520	430	221798	357178	32.74%
11/09/02	19	385240	249	128209	204175	33.28%
11/10/02	28	609650	376	194668	323118	31.93%
11/11/02	29	648100	397	204625	342895	31.57%
11/12/02	33	666760	434	223867	348349	33.58%
11/13/02	25	568360	350	179614	301230	31.60%
11/14/02	31	676340	432	222576	358471	32.91%
11/15/02	29	605650	389	201490	320994	33.27%
11/16/02	16	359020	233	120013	190279	33.43%
11/17/02	27	566100	379	194941	294558	34.44%
11/18/02	19	390660	256	132723	203141	33.97%
11/19/02	28	523370	353	181809	268957	34.74%
11/20/02	39	656460	436	223080	339504	33.98%
11/21/02	34	616260	425	219415	317389	35.60%
11/22/02	29	558840	403	207994	282994	37.22%

BRITZ GIN PARTNERSHIP II (BRTZG-02) 12/19/03
Ginning Summary

Trailer/Modules: «BOTH»

Date	Loads	Net weight	Bales	Bale Wt	Seed Wt	Turnout
11/23/02	32	621080	406	209512	322943	33.73%
11/24/02	27	513720	355	180123	264799	35.06%
11/25/02	26	532540	371	189757	271596	35.63%
11/26/02	24	516320	353	182913	263323	35.43%
11/27/02	27	595800	394	203422	311889	34.14%
11/29/02	31	657060	427	219836	348243	33.46%
11/30/02	22	491140	318	163318	260305	33.25%
12/01/02	32	661980	422	217264	350848	32.82%
12/02/02	30	684800	443	228808	362941	33.41%
12/03/02	30	649000	428	219433	341605	33.81%
12/04/02	33	729080	506	260110	371832	35.68%
12/05/02	27	533640	355	184400	276186	34.56%
12/06/02	33	673060	442	230165	349991	34.20%
12/07/02	26	543180	374	192835	278305	35.50%
12/08/02	22	505440	343	177996	257563	35.22%
12/09/02	29	608620	385	198722	315345	32.65%
12/10/02	25	501170	337	172046	256635	34.33%
12/11/02	30	529870	368	189096	283590	35.69%
12/12/02	14	251560	177	90167	135842	35.84%
12/13/02	28	537880	375	192672	279957	35.82%
12/14/02	26	554600	375	191546	282845	34.54%
12/15/02	27	610220	406	209319	311203	34.30%
12/16/02	26	496860	350	179457	253397	36.12%
12/17/02	25	489140	341	174197	249514	35.61%
12/18/02	28	504670	347	179282	260956	35.52%
12/19/02	26	508440	346	179317	259284	35.27%
12/20/02	25	487820	345	175972	248747	36.07%
12/21/02	29	558680	387	199067	284928	35.63%
12/22/02	23	493940	325	168714	251910	34.16%
12/23/02	5	109020	74	38072	55601	34.92%
*TOTAL :	2162	44990450	30372	15645776	23412017	34.78%

500 # Basis = 31292 Bales

TO: TOM

3 PAGES



OCT. 14. 2003 2:36PM PACIFIC GAS ELECTRIC

"Old Britz Helm Gin Gas usage information"							
SA_ID	SERVICE ADDRESS	PRIOR READ DATE	CURRENT READ DATE	BILLING PERIOD	RS_CD	THERMS	GAS CHARGES
5733968005	NW NE 23 16 17	3/15/1999	4/13/1999	29	GNR1	286	\$171.74
5733968005	NW NE 23 16 17	4/13/1999	5/12/1999	29	GNR1	218	\$125.87
5733968005	NW NE 23 16 17	5/12/1999	6/11/1999	30	GNR1	132	\$85.45
5733968005	NW NE 23 16 17	6/11/1999	7/13/1999	32	GNR1	120	\$80.22
5733968005	NW NE 23 16 17	7/13/1999	8/13/1999	31	GNR1	113	\$77.73
5733968005	NW NE 23 16 17	8/13/1999	9/13/1999	31	GNR1	114	\$79.14
5733968005	NW NE 23 16 17	9/13/1999	10/12/1999	29	GNR1	105	\$77.73
5733968005	NW NE 23 16 17	10/12/1999	11/12/1999	31	GNR1	8,687	\$4,891.92
5733968005	NW NE 23 16 17	11/12/1999	12/14/1999	32	GNR1	15,984	\$9,304.10
5733968005	NW NE 23 16 17	12/14/1999	1/14/2000	31	GNR1	440	\$323.92
5733968005	NW NE 23 16 17	1/14/2000	2/14/2000	31	GNR1	398	\$296.15
5733968005	NW NE 23 16 17	2/14/2000	3/15/2000	30	GNR1	350	\$259.35
5733968005	NW NE 23 16 17	3/15/2000	4/13/2000	29	GNR1	234	\$166.42
5733968005	NW NE 23 16 17	4/13/2000	5/12/2000	29	GNR1	190	\$130.56
5733968005	NW NE 23 16 17	5/12/2000	6/14/2000	33	GNR1	145	\$105.83
5733968005	NW NE 23 16 17	6/14/2000	7/14/2000	30	GNR1	125	\$99.14
5733968005	NW NE 23 16 17	7/14/2000	8/14/2000	31	GNR1	126	\$107.05
5733968005	NW NE 23 16 17	8/14/2000	9/13/2000	30	GNR1	121	\$100.44
5733968005	NW NE 23 16 17	9/13/2000	10/12/2000	29	GNR1	518	\$415.51
5733968005	NW NE 23 16 17	10/12/2000	11/10/2000	29	GNR1	15,589	\$11,640.84

NO. 621 P. 1

SA_ID	SERVICE ADDRESS	PRIOR READ DATE	CURRENT READ DATE	BILLING PERIOD	RS_CD	THERMS	GAS CHARGES
5733968005	NW NE 23 16 17	7/15/2002	8/13/2002	29	GNR1	118	\$72.43
5733968005	NW NE 23 16 17	8/13/2002	9/12/2002	30	GNR1	120	\$77.72
5733968005	NW NE 23 16 17	9/12/2002	10/11/2002	29	GNR1	2,631	\$1,583.53
5733968005	NW NE 23 16 17	10/11/2002	11/12/2002	32	GNR1	19,354	\$11,775.34
5733968005	NW NE 23 16 17	11/12/2002	12/11/2002	29	GNR1	21,526	\$14,987.69
5733968005	NW NE 23 16 17	12/11/2002	1/11/2003	31	GNR1	15,549	\$11,969.34
5733968005	NW NE 23 16 17	1/11/2003	2/11/2003	31	GNR1	211	\$202.02
5733968005	NW NE 23 16 17	2/11/2003	3/14/2003	31	GNR1	198	\$191.97
5733968005	NW NE 23 16 17	3/14/2003	4/12/2003	29	GNR1	162	\$163.34
5733968005	NW NE 23 16 17	4/12/2003	5/13/2003	31	GNR1	130	\$109.15
5733968005	NW NE 23 16 17	5/13/2003	6/12/2003	30	GNR1	116	\$98.73
5733968005	NW NE 23 16 17	6/12/2003	7/14/2003	32	GNR1	114	\$106.29
5733968005	NW NE 23 16 17	7/14/2003	8/12/2003	29	GNR1	101	\$95.86
5733968005	NW NE 23 16 17	8/12/2003	9/11/2003	30	GNR1	103	\$101.04

SA_ID	SERVICE ADDRESS	PRIOR READ DATE	CURRENT READ DATE	BILLING PERIOD	RS_CD	THERMS	GAS CHARGES
5733968005	NW NE 23 16 17	11/10/2000	12/12/2000	32	GNR1	25,699	\$21,320.41
5733968005	NW NE 23 16 17	11/10/2000	12/12/2000	32	GNR1	0	\$376.26
5733968005	NW NE 23 16 17	12/12/2000	1/11/2001	30	GNR1	17,090	\$18,788.13
5733968005	NW NE 23 16 17	1/11/2001	2/12/2001	32	GNR1	371	\$662.92
5733968005	NW NE 23 16 17	2/12/2001	3/14/2001	30	GNR1	332	\$535.33
5733968005	NW NE 23 16 17	3/14/2001	4/12/2001	29	GNR1	222	\$305.11
5733968005	NW NE 23 16 17	4/12/2001	5/14/2001	32	GNR1	209	\$244.16
5733968005	NW NE 23 16 17	5/14/2001	6/13/2001	30	GNR1	136	\$147.04
5733968005	NW NE 23 16 17	6/13/2001	7/13/2001	30	GNR1	134	\$121.76
5733968005	NW NE 23 16 17	7/13/2001	8/13/2001	31	GNR1	140	\$129.01
5733968005	NW NE 23 16 17	8/13/2001	9/12/2001	30	GNR1	133	\$96.04
5733968005	NW NE 23 16 17	9/12/2001	10/11/2001	29	GNR1	119	\$68.43
5733968005	NW NE 23 16 17	10/11/2001	11/9/2001	29	GNR1	9,528	\$3,002.91
5733968005	NW NE 23 16 17	11/9/2001	12/12/2001	33	GNR1	25,163	\$12,193.99
5733968005	NW NE 23 16 17	12/12/2001	1/12/2002	31	GNR1	6,298	\$4,264.66
5733968005	NW NE 23 16 17	1/12/2002	2/12/2002	31	GNR1	487	\$343.61
5733968005	NW NE 23 16 17	2/12/2002	3/15/2002	31	GNR1	252	\$158.74
5733968005	NW NE 23 16 17	3/15/2002	4/12/2002	28	GNR1	174	\$111.01
5733968005	NW NE 23 16 17	4/12/2002	5/14/2002	32	GNR1	188	\$119.66
5733968005	NW NE 23 16 17	5/14/2002	6/13/2002	30	GNR1	139	\$89.15
5733968005	NW NE 23 16 17	6/13/2002	7/15/2002	32	GNR1	132	\$79.17

Appendix C: ERC Application

San Joaquin Valley Air Pollution Control District Application for

EMISSION REDUCTION CREDIT (ERC)

CONSOLIDATION OF ERC CERTIFICATES

RECEIVED
DEC 22 2003
Facility Services
SJVAPCD

1. ERC TO BE ISSUED TO: Britz Ag Finance Co. Inc. Facility ID: _____ (if known)

2. MAILING ADDRESS: Street/P.O. Box: P.O. Box 9050
City: Fresno State: CA Zip Code: 93790

3. LOCATION OF REDUCTION: Street: 16423 W. Kamm Ave.
City: Helm, CA 93627
_____/4 SECTION _____ TOWNSHIP _____ RANGE _____

4. DATE OF REDUCTION: 8/20/03

5. PERMIT NO(S): C-978-1-4 EXISTING ERC NO(S): _____

6. METHOD RESULTING IN EMISSION REDUCTION:
 SHUTDOWN RETROFIT PROCESS CHANGE OTHER
DESCRIPTION: _____
(Use additional sheets if necessary)

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

	VOC	NOx	CO	PM10	SOx	OTHER
1ST QUARTER						
2ND QUARTER						
3RD QUARTER						
4TH QUARTER				27255		

8. SIGNATURE OF APPLICANT: Robert Glassman TYPE OR PRINT TITLE OF APPLICANT: Vice President

9. TYPE OR PRINT NAME OF APPLICANT: Bob Glassman DATE: _____ TELEPHONE NO: 448-8000

FOR APCD USE ONLY:

<p>DATE STAMP</p> <p>RECEIVED</p> <p>DEC 23 2003</p> <p>FINANCE</p> <p>SJVAPCD</p>	FILING FEE RECEIVED: \$ <u>650.71 CR 24448</u>
	DATE PAID: <u>12/22/03</u>
	PROJECT NO.: <u>C-1032163</u> FACILITY ID: <u>C-978</u>

Appendix D:
AP-42 Natural Gas Combustion Emission Factors

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 11. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. To convert from lb/10⁶ scf to kg/10⁶ m³, multiply by 16. Emission factors are based on an average natural gas higher heating value of 1,020 Btu/scf. To convert from lb/10⁶ 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 NO₂. 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 ₂ O (Uncontrolled)	2.2	E
N ₂ O (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 11. 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/10⁶ scf to kg/10⁶ m³, multiply by 16. To convert from lb/10⁶ 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 CO₂. $CO_2[\text{lb}/10^6 \text{ scf}] = (3.67) (\text{CON}) (\text{C})(\text{D})$, where CON = fractional conversion of fuel carbon to CO₂, C = carbon content of fuel by weight (0.76), and D = density of fuel, 4.2x10⁴ lb/10⁶ scf.

^c All PM (total, condensable, 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 PM₁₀, PM_{2.5} or PM₁ emissions. Total PM is the sum of the filterable PM and condensable PM. Condensable 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 SO₂.

Assumes sulfur content is natural gas of 2,000 grains/10⁶ scf. The SO₂ emission factor in this table can be converted to other natural gas sulfur contents by multiplying the SO₂ emission factor by the ratio of the site-specific sulfur content (grains/10⁶ scf) to 2,000 grains/10⁶ scf.

Appendix E:
Cotton Gin Emission Factors Summary Table⁵

⁵ Summary table obtained from the California Cotton Ginner Association, Cotton Gin Emission Factor Handbook.

GIN TYPE: SAW			
CONTROL: 1D-3D			
EMISSIONS (lb PM ₁₀ /bale)			
SYSTEM	AVG.	+S.D.	- S.D.
Unloading	.11	.16	.06
#1 Precleaning	.11	.14	.09
#2 Precleaning	.08	.12	.04
#3 Precleaning	.09	.18	.00
Overflow	.04	.06	.01
Gin Stand/Feeder Trash	.09	.12	.05
#1 Lint Cleaning ¹	.10	.10	.10
#2 Lint Cleaning ¹	.03	.03	.03
Lint Cleaning ²	.11	.17	.05
Lint Trash/Robber	.07	.09	.05
Battery Condenser	.03	.07	.01
Motes	.07	.12	.02
Motes Cleaner Trash	.02	.02	.02
Stockpiler	.09	.12	.06
TOTAL ³	0.91	1.37	0.46
¹ Use when lint cleaner condenser fan is pulling from a single stage of condensers ² Use when lint cleaner condenser fan is pulling from both 1 st and 2 nd stage condensers ³ Assumes total "lint cleaning" emission factor instead of individual stages			

GIN TYPE: ROLLER			
CONTROL: 1D-3D			
EMISSIONS (lb PM ₁₀ /bale)			
SYSTEM	AVG.	+S.D.	- S.D.
Unloading	.23	.30	.16
#1 Precleaning	.24	.42	.06
#2 Precleaning	.14	.14	.14
#3 Precleaning	.19	.26	.13
Overflow	.03	.03	.03
Gin Stand/Feeder Trash	.04	.06	.03
#1 Lint Cleaning ¹	.02	.03	.01
#2 Lint Cleaning ¹	.04	.06	.03
Lint Cleaning ²	.05	.08	.02
Lint Trash/Robber	.03	.04	.02
Battery Condenser	.07	.10	.05
Motes	N/A	N/A	N/A
Motes Cleaner Trash	N/A	N/A	N/A
Stockpiler	.06	.06	.06
TOTAL ³	1.08	1.49	0.7
¹ Use when lint cleaner condenser fan is pulling from a single stage of condensers ² Use when lint cleaner condenser fan is pulling from both 1 st and 2 nd stage condensers ³ Assumes total "lint cleaning" emission factor instead of individual stages			

San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726

Emission Reduction Credit Certificate
C-586-1

ISSUED TO: BRITZ INCORPORATED
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 16423 W KAMM AVE
HELM, CA 93627

For VOC Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	21 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source
 Shutdown of Emissions Units
 Other

COTTON GIN SHUTDOWN

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

David L. Crow, Executive Director / APCO

DRAFT

Seyed Sadredin, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726

Emission Reduction Credit Certificate
C-586-2

ISSUED TO: BRITZ INCORPORATED
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 16423 W KAMM AVE
HELM, CA 93627

For NOx Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	381 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source
 Shutdown of Emissions Units
 Other

COTTON GIN SHUTDOWN

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

David L. Crow, Executive Director / APCO

DRAFT

Seyed Sadredin, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726

Emission Reduction Credit Certificate
C-586-3

ISSUED TO: BRITZ INCORPORATED
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 16423 W KAMM AVE
HELM, CA 93627

For CO Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	320 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source
 Shutdown of Emissions Units
 Other

COTTON GIN SHUTDOWN

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

David L. Crow, Executive Director / APCO

DRAFT

Seyed Sadredin, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726

Emission Reduction Credit Certificate
C-586-4

ISSUED TO: BRITZ INCORPORATED
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 16423 W KAMM AVE
HELM, CA 93627

For PM10 Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	19,720 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source
 Shutdown of Emissions Units
 Other

COTTON GIN SHUTDOWN

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

David L. Crow, Executive Director / APCO

DRAFT

Seyed Sadredin, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726

Emission Reduction Credit Certificate
C-586-5

ISSUED TO: BRITZ INCORPORATED
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 16423 W KAMM AVE
HELM, CA 93627

For SOx Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	11 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source
 Shutdown of Emissions Units
 Other

COTTON GIN SHUTDOWN

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

David L. Crow, Executive Director / APCO

DRAFT

Seyed Sadredin, Director of Permit Services

GIN TYPE: SAW			
CONTROL: 1D-3D			
SYSTEM	EMISSIONS (lb PM ₁₀ /bale)		
	AVG.	+S.D.	- S.D.
Unloading	.11	.16	.06
#1 Precleaning	.11	.14	.09
#2 Precleaning	.08	.12	.04
#3 Precleaning	.09	.18	.00
Overflow	.04	.06	.01
Gin Stand/Feeder Trash	.09	.12	.05
#1 Lint Cleaning ¹	.10	.10	.10
#2 Lint Cleaning ¹	.03	.03	.03
Lint Cleaning ²	.11	.17	.05
Lint Trash/Robber	.07	.09	.05
Battery Condenser	.03	.07	.01
Motes	.07	.12	.02
Motes Cleaner Trash	.02	.02	.02
Stockpiler	.09	.12	.06
TOTAL ³	0.91	1.37	0.46

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

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

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

PROJECT ROUTING FORM

PROJECT NUMBER: C-1032163

FACILITY ID: C-0978

PERMIT NOS: _____

APPLICANT NAME: BRITZ AG FINANCE CO

MAILING ADDRESS: P O BOX 9050 FRESNO CA 93790

PRELIMINARY REVIEW	ENGR	DATE	SUPR	DATE
A. Application Deemed Incomplete				
Second Information Letter				
B. Application Deemed Complete	RH	12/29/03	Jay	12/30/03
C. Application Pending Denial				
D. Application Denied				

ENGINEERING EVALUATION	INITIAL	DATE
E. Engineering Evaluation Complete	RH	1/8/04
F. Supervising Engineer Approval	Jay	1/15/04
G. Final Engineering Evaluation Moved to G:/Per/EE	RH	3/29/04
H. Compliance Division Approval <input checked="" type="checkbox"/> Not Required		
I. Permit Services Regional Manager Approval	DW	2/9/04

DIRECTOR REVIEW: Not Required Required

DIRECTOR REVIEW	INITIAL	DATE
J. Preliminary Approval to Director	DW	2/9
K. Final Approval to Director	DW	3/29

Date ATC's mailed: _____

R.H.

San Joaquin Valley Air Pollution Control District Application for

EMISSION REDUCTION CREDIT (ERC)

CONSOLIDATION OF ERC CERTIFICATES

RECEIVED
DEC 22 2003
Permit Service
SJVAPCD

1. ERC TO BE ISSUED TO: Britz Ag Finance Co. Inc. Facility ID: _____ (if known)

2. MAILING ADDRESS: Street/P.O. Box: P.O. Box 9050
City: Fresno State: CA Zip Code: 93790

3. LOCATION OF REDUCTION: Street: 16423 W. Kamm Ave.
City: Helm, CA 93627
_____/4 SECTION _____ TOWNSHIP _____ RANGE _____

4. DATE OF REDUCTION: 8/20/03

5. PERMIT NO(S): C-978-1-4 EXISTING ERC NO(S): _____

6. METHOD RESULTING IN EMISSION REDUCTION:
 SHUTDOWN RETROFIT PROCESS CHANGE OTHER
DESCRIPTION: _____
(Use additional sheets if necessary)

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

	VOC	NOx	CO	PM10	SOx	OTHER
1ST QUARTER						
2ND QUARTER						
3RD QUARTER						
4TH QUARTER				27255		

8. SIGNATURE OF APPLICANT: Robert Glassman TYPE OR PRINT TITLE OF APPLICANT: Vice President

9. TYPE OR PRINT NAME OF APPLICANT: Bob Glassman DATE: _____ TELEPHONE NO: 448-8000

FOR APCD USE ONLY:

<p>RECEIVED DEC 23 2003 FINANCE SJVAPCD</p>	DATE STAMP
	FILING FEE RECEIVED: \$ <u>650.71</u> <u>CR 24448</u>
	DATE PAID: <u>12/22/03</u> <u>MM</u>
	PROJECT NO.: <u>C-1032163</u> FACILITY ID.: <u>C-978</u>

San Joaquin Valley Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-4289-2-0

LEGAL OWNER OR OPERATOR: HELM SULFUR INC
MAILING ADDRESS: P O BOX 366
FIVE POINTS, CA 93624



LOCATION: 16423 W KAMM
HELM, CA

EQUIPMENT DESCRIPTION:

SULFUR GRINDING OPERATION CONSISTING OF A HOPPER/FEEDER, BELT CONVEYOR, ROLLER MILL, A PNEUMATIC CONVEYANCE SYSTEM UTILIZING A 4 MMBTU/HR GAS ATMOSPHERES MODEL XH-5500-NM NATURAL GAS-FIRED INERT GAS GENERATOR, GAS ATMOSPHERES MODEL R-5500-C REFRIGERANT GAS DRYER, AND CYCLONE COLLECTOR VENTING THROUGH A CP ENVIRONMENTAL MODEL 100-TNFD-020-C BAGHOUSE AND A BAGGING OPERATION VENTED THROUGH AN AIR VENT FILTER MODEL 54ST25 BAGHOUSE

CONDITIONS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. {1934} 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]
3. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. {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]
5. Gas Atmospheres inert gas generator 4 MMBtu/hr rating is based on maintaining an exhaust oxygen level of 8% O2 while combusting approximately 4,000 SCF per hour of natural gas and using HHV of 1,000 Btu/SCF. [District Rule 2201]
6. Inert gas generator shall be fired solely on PUC regulated natural gas. [District Rule 2201]
7. Gas Atmospheres inert gas generator emissions shall not exceed any of the following: 0.0841 lb NOx/MMBtu (or 50 ppmv @ 8% O2), 0.0051 lb CO/MMBtu (or 5 ppmv CO @ 8% O2), 0.00285 lb SOx/MMBtu, 0.005 lb VOC/MMBtu. All emissions measurements shall be averaged over a period of 15 minutes. Measurements shall be taken at the source test port of the gas generator exhaust duct. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

DAVID L. CROW, Executive Director, APCO

DRAFT

SEYED SADREKH, Director of Permit Services
04/20/03 2:01 PM 11/18/03 - 31093001 : vnlh, inspection Required with 31093001

Conditions for C-4289-2-0 (continued)

Page 2 of 2

8. Source testing of the inert gas generator to demonstrate compliance with NO_x emission limits shall be conducted within 90 days of initial start-up. [District Rule 1081]
9. Source testing to measure oxides of nitrogen (ppmv) shall be conducted using EPA Method 7E, or ARB Method 100. [District Rule 1081]
10. Source testing to measure exhaust gas oxygen shall be conducted using EPA Method 3 or 3A, or ARB Method 100. [District Rule 1081]
11. (109) Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
12. Source test results shall be submitted to the District within 60 days thereafter. [District Rule 1081]
13. Roller mill hopper loading emissions shall not exceed 0.01 lb PM₁₀/ton of sulfur powder manufactured. [District Rule 2201]
14. Hopper loading, roller mill, and bagging operation throughput shall not exceed ¹⁷⁵160 tons/day of sulfur powder manufactured. [District Rule 2201]
15. Roller mill pneumatic conveyance system baghouse emissions shall not exceed 0.00187 lb PM₁₀/ton of sulfur powder manufactured. [District Rule 2201]
16. Bagging operation baghouse emissions shall not exceed 0.00125 lb PM₁₀/ton of sulfur powder manufactured. [District Rule 2201]
17. Visible emissions from the CP Environmental and the Air Vent Filter baghouse serving roller mill pneumatic conveyance system and the bagging operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
18. Records of the weight of sulfur powder manufactured in tons per day shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection on request. [District Rule 1070]
19. PTO #C-978-1-4 shall be canceled and surrendered to the District prior to the implementation of this ATC. [District Rule 2201]

**DRAFT**

CONDITIONS CONTINUE ON NEXT PAGE

San Joaquin Valley Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-4289-1-0

LEGAL OWNER OR OPERATOR: HELM SULFUR INC
MAILING ADDRESS: P O BOX 366
FIVE POINTS, CA 93624

LOCATION: 16423 W KAMM
HELM, CA

EQUIPMENT DESCRIPTION:
SULFUR ROTOFORMING OPERATION CONSISTING OF A 19,000 GALLON HEATED MOLTEN SULFUR RECEIVING TANK, ROTOFORMER WITH STEEL CONVEYING BELT, CONVEYORS, AND FOUR STORAGE BUNKERS

CONDITIONS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. {1934} 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]
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. Molten sulfur shall be stored in an enclosed tank. [District Rule 2201]
5. Molten sulfur throughput shall not exceed 150,000 lb/day. [District Rule 2201] *600,000*
6. All molten sulfur transfer shall be through enclosed piping system. Contact surfaces between unloading arms and stationary pipes shall seat effectively around the entire circumference to minimize spillage. [District Rule 2201]
7. There shall be no visible emissions in excess of 5% opacity for a period or periods aggregating more than three minutes in any one hour from the Rotoforming operation. [District Rule 2201]
8. Rotoformer throughput shall not exceed *12* tons of pastilles per hour. [District Rule 2201]
9. PM10 emissions from the rotoformer conveyor to storage piles shall not exceed 0.0014 lb/ton of pastilles. [District Rule 2201]
10. The handling of sulfur pastilles in the storage bunkers shall not result in fugitive dust emissions in excess of 20% opacity. [District Rule 2201]



CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

DAVID L. CROW, Executive Director / APCO

DRAFT

SEYED SADREKH, Director of Permit Services
C-4289-1-0 Dec 17 2003 11:02AM 558RITZ FIVE POINTS:D CENTRAL

Conditions for C-4289-1-0 (continued)

Page 2 of 2

11. Records of the Rotoformer throughput in tons of pastilles ^{per hour} shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection on request. [District Rule 1070]
12. PTO #C-978-1-4 shall be cancelled and surrendered to the District prior to the implementation of this ATC. [District Rule 2201]



DRAFT

Britz Ag Finance Company, Inc
 (Britz Inc Gin)

2001 Season of Ginned Bales (VERIFICATION)

10/15/01	101	10/23/01	380	10/31/01	315	11/08/01	430
	0		0		0		0
	101		380		315		430
10/16/01	120	10/24/01	328	11/01/01	453	11/09/01	464
	0		0		0		0
	120		328		453		464
10/17/01	213	10/25/01	286	11/02/01	448	11/10/01	385
	0		0		0		0
	213		286		448		385
10/18/01	211	10/26/01	356	11/03/01	430	11/11/01	202
	0		0		0		0
	211		356		430		202
10/19/01	252	10/27/01	421	11/04/01	340	11/12/01	260
	0		0		0		0
	252		421		340		260
10/20/01	378	10/28/01	390	11/05/01	434	11/13/01	263
	0		0		0		0
	378		390		434		263
10/21/01	429	10/29/01	348	11/06/01	433	11/14/01	323
	0		0		0		0
	429		348		433		323
10/22/01	303	10/30/01	312	11/07/01	413	11/15/01	351
	0		0		0		0
	303		312		413		351
						Subtotal	10,772 Bales

Verification of Calcs

$$\text{ERC} = \text{AER} - \text{AQID} (\text{AER} * 0.10) =$$

where:

ERC = Bankable Emission Reduction Credits.

AER = Actual Emission Reduction based on Actual Historical Data.

AQID = Air Quality Improvement Deduction for the District.

$$\text{ERC}_{\text{NOX}} = 423 - (423 * 0.10) = 381$$

$$\text{ERC}_{\text{SOX}} = 12 - (12 * 0.10) = 11$$

$$\text{ERC}_{\text{PM10}} = 21,911 - (21,911 * 0.10) = 19,720$$

$$\text{ERC}_{\text{CO}} = 355 - (355 * 0.10) = 320$$

$$\text{ERC}_{\text{VOC}} = 23 - (23 * 0.10) = 21$$

Britz Ag Finance Company, Inc
(Britz Inc Gin)

2001 Season of Ginned Bales

11/16/01	309	11/24/01	362	12/02/01	427	12/10/01	356
	0		0		0		0
	309		362		427		356
11/17/01	339	11/25/01	293	12/03/01	376	12/11/01	309
	0		0		0		0
	339		293		376		309
11/18/01	308	11/26/01	319	12/04/01	408	12/12/01	375
	0		0		0		0
	308		319		408		375
11/19/01	329	11/27/01	343	12/05/01	346	12/13/01	414
	0		0		0		0
	329		343		346		414
11/20/01	337	11/28/01	430	12/06/01	471	12/14/01	342
	0		0		0		0
	337		430		471		342
11/21/01	310	11/29/01	377	12/07/01	391	12/15/01	389
	0		0		0		0
	310		377		391		389
11/22/01	0	11/30/01	430	12/08/01	394	12/16/01	399
	0		0		0		0
	0		430		394		399
11/23/01	332	12/01/01	428	12/09/01	421	12/17/01	273
	0		0		0		0
	332		428		421		273

Subtotal 11,337 Bales

Total 22,109 Bales

Britz Ag Finance Company, Inc
(Britz Inc Gin)

2002 Season of Ginned Bales (VERIFICATION)

10/03/02	184 0 184	10/11/02	412 0 412	10/19/02	460 0 460	10/27/02	438 0 438
10/04/02	177 0 177	10/12/02	422 0 422	10/20/02	364 0 364	10/28/02	422 0 422
10/05/02	187 0 187	10/13/02	402 0 402	10/21/02	369 0 369	10/29/02	465 0 465
10/06/02	195 0 195	10/14/02	411 0 411	10/22/02	455 0 455	10/30/02	463 0 463
10/07/02	276 0 276	10/15/02	396 0 396	10/23/02	373 0 373	10/31/02	479 0 479
10/08/02	307 0 307	10/16/02	333 0 333	10/24/02	464 0 464	11/01/02	467 0 467
10/09/02	413 0 413	10/17/02	338 0 338	10/25/02	435 0 435	11/02/02	405 0 405
10/10/02	430 0 430	10/18/02	348 0 348	10/26/02	401 0 401	11/03/02	442 0 442
						Subtotal	12,133 Bales

Britz Ag Finance Company, Inc
(Britz Inc Gin)

2002 Season of Ginned Bales

11/04/02	497	11/12/02	434	11/20/02	436	11/28/02	0
	0		0		0		0
	497		434		436		0
11/05/02	518	11/13/02	350	11/21/02	425	11/29/02	427
	0		0		0		0
	518		350		425		427
11/06/02	456	11/14/02	432	11/22/02	403	11/30/02	318
	0		0		0		0
	456		432		403		318
11/07/02	351	11/15/02	389	11/23/02	406	12/01/02	422
	0		0		0		0
	351		389		406		422
11/08/02	430	11/16/02	233	11/24/02	355	12/02/02	443
	0		0		0		0
	430		233		355		443
11/09/02	249	11/17/02	379	11/25/02	371	12/03/02	428
	0		0		0		0
	249		379		371		428
11/10/02	376	11/18/02	256	11/26/02	353	12/04/02	506
	0		0		0		0
	376		256		353		506
11/11/02	397	11/19/02	353	11/27/02	394	12/05/02	355
	0		0		0		0
	397		353		394		355

Subtotal **12,142 Bales**

Britz Ag Finance Company, Inc
 (Britz Inc Gin)

2002 Season of Ginned Bales

12/06/02	442	12/14/02	375	12/22/02	325
	0		0		0
	442		375		325
12/07/02	374	12/15/02	406	12/23/02	74
	0		0		0
	374		406		74
12/08/02	343	12/16/02	350	12/24/02	0
	0		0		0
	343		350		0
12/09/02	385	12/17/02	341	Subtotal	6,097 Bales
	0		0		
	385		341	Total	30,372 Bales
12/10/02	337	12/18/02	347		
	0		0		
	337		347		
12/11/02	368	12/19/02	346		
	0		0		
	368		346		
12/12/02	177	12/20/02	345		
	0		0		
	177		345		
12/13/02	375	12/21/02	387		
	0		0		
	375		387		

Lynn Sargenti

From: Lynn Sargenti
Sent: Tuesday, March 30, 2004 3:36 PM
To: FRESNO BEE (E-mail)
Subject: Public Notice, Project #C-1032163

Importance: High



FRESNO BEE
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Doc1.doc

7003 1680 0001 3385 6041

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OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage	Robert Glassman	
Sent To	Britz Ag Finance Company, Inc.	
	PO Box 9050	
Street, Apt. # or PO Box N.	Fresno, CA 93790	
City, State, Z		

PS Form 3800, June 2002 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Robert Glassman
Britz Ag Finance Company, Inc.
PO Box 9050
Fresno, CA 93790

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Address

B. Received by (Printed Name) *Christy* C. Date of Delivery *4-1-04*

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

3. Service Type

Certified Mail Express Mail

Registered Return Receipt for Merchandise

Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7003 1680 0001 3385 6041

BRC's Proj. # C-1032163

From Please print and press hard.
Date 3/30/04 Sender's FedEx Account Number 1500-4459-6

Sender's Name S SADREDIN Phone (559) 230-6000

Company SJV UNIFIED AIR POLLUTION DIS

Address 1990 E GETTYSBURG AVE

City FRESNO State CA ZIP 93726-0244

Our Internal Billing Reference
* 24 characters will appear on invoice.
S-1040734
C-1032163
S-1032836
S-1031288

Recipient's Name GERARDO RIOS Phone (415) 744-1264

Company US EPA - REGION IX

Address 75 HAWTHORNE ST

"HOLD" at FedEx location, print FedEx address. We cannot deliver to P.O. boxes or P.O. ZIP codes.

Address

City SAN FRANCISCO State CA ZIP 94105

4a Express Package Service
 FedEx Priority Overnight
 FedEx Standard Overnight
 FedEx 2Day
 FedEx Express Saver

4b Express Freight Service
 FedEx 1Day Freight*
 FedEx 2Day Freight
 FedEx 3Day Freight

5 Packaging
 FedEx Envelope*
 FedEx Pak*
 Other

6 Special Handling
 SATURDAY Delivery Available ONLY for FedEx Priority Overnight and FedEx 2Day to select ZIP codes.
 HOLD Weekday at FedEx Location NOT Available for FedEx First Overnight.
 HOLD Saturday at FedEx Location Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.
 Does this shipment contain dangerous goods?
 No Yes Yes Dry Ice
 As per attached Shipper's Declaration Shipper's Declaration not required Dry Ice, 9 UN 1845 x kg
 Dangerous Goods (including Dry Ice) cannot be shipped in FedEx packaging. Cargo Aircraft Only

7 Payment Bill to: Enter FedEx Acct. No. or Credit Card No. below.
 Sender Acct. No. in Section 1 will be billed. Recipient Third Party Credit Card Cash/Check

FedEx Acct. No. Credit Card No. Exp. Date
 Total Packages Total Weight Total Declared Value*
 \$.00
 *Our liability is limited to \$100 unless you declare a higher value. See back for details. FedEx Use Only

8 Release Signature Sign to authorize delivery without obtaining signature.
 By signing you authorize us to deliver this shipment without obtaining a signature and agree to indemnify and hold us harmless from any resulting claims.
 447

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FINANCE
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PROOF OF PUBLICATION

SAN JOAQUIN VALLEY APCD

ATTN FINANCE DEPARTMENT

1990 E GETTYSBURG

FRESNO, CA 93726

COUNTY OF FRESNO
STATE OF CALIFORNIA

EXHIBIT A.

PUBLIC NOTICE

#55567

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 Britz ag Finance Company, Inc for shutdown of your cotton gin, at 16423 W. Kamm Avenue in Helm, CA. The quantity of ERCs proposed for banking is 19,720 lb-PM10/qr; 381 lb-NOx/qr; 320 lb-CO/qr; 21 lb VOC/qr; and 11 lb SOx/qr for the fourth quarter.

The analysis of the regulatory basis for these proposed actions, Project #C-1032163, 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: Feb. 19, 2004)

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.

February 19, 2004

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 FEBRUARY 19, 2004

Cathy Aguilera

Cathy Pollastrini

From: Cathy Pollastrini
Sent: Friday, February 13, 2004 3:09 PM
To: FRESNO BEE (E-mail)
Subject: Public Notice C-1032163



FRESNO BEE
COVER PG.rtf



Doc2.doc

Any questions, please call me. Thanks!

1 From Please print and press hard. Date 2-13-04 Sender's FedEx Account Number 1500-4459-6 Sender's Name S SADREDRIN Phone (559) 230-6000 Company SJV UNIFIED AIR POLLUTION DIS Address 1990 E GETTYSBURG AVE City FRESNO State CA ZIP 93726-0244

2 Your Internal Billing Reference N-1021697 C-1032163

3 To Recipient's Name MIKE TOLLSTRUP Phone (916) 322-6026 Company CARB-PROJECT ACCESS BRANCH Address 1001 I ST 6TH FLR City SACRAMENTO State CA ZIP 95814

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0265053104

4a Express Package Service Packages up to 150 lbs. FedEx Priority Overnight Next business morning FedEx Standard Overnight Next business afternoon FedEx First Overnight Earliest next business morning delivery to select locations

4b Express Freight Service Packages over 150 lbs. FedEx 1Day Freight Next business day FedEx 2Day Freight Second business day FedEx 3Day Freight Third business day

5 Packaging Declared value limit \$500. FedEx Envelope* FedEx Pak* Other

6 Special Handling SATURDAY Delivery Available ONLY for FedEx Priority Overnight and FedEx 2Day to select ZIP codes. HOLD Weekday at FedEx Location NOT Available for FedEx First Overnight. HOLD Saturday at FedEx Location Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.

7 Payment Bill to: Sender Acct. No. in Section 1 will be billed. Recipient Third Party Credit Card Cash/Check. Total Packages Total Weight Total Declared Value \$.00

8 Release Signature Sign to authorize delivery without obtaining signature. 447

1 From Please print and press hard. Date 2-13-04 Sender's FedEx Account Number 1500-4459-6 Sender's Name S SADREDIN Phone (559) 230-6000 Company SJV UNIFIED AIR POLLUTION DIS Address 1990 E GETTYSBURG AVE City FRESNO State CA ZIP 93726-0244

2 Your Internal Billing Reference C-1032163

3 To Recipient's Name GERARDO RIOS Phone (415) 744-1264 Company US EPA - REGION IX Address 75 HAWTHORNE ST City SAN FRANCISCO State CA ZIP 94105

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4a Express Package Service Packages up to 150 lbs. FedEx Priority Overnight Next business morning FedEx Standard Overnight Next business afternoon FedEx First Overnight Earliest next business morning delivery to select locations

4b Express Freight Service Packages over 150 lbs. FedEx 1Day Freight Next business day FedEx 2Day Freight Second business day FedEx 3Day Freight Third business day

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