San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

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

Emission Reduction Credit Certificate
C-794-1

ISSUED TO: EAGLE VALLEY GINNING LLC

ISSUED DATE: April 30, 2007

LOCATION OF REDUCTION: 39936 W NORTH AVE
MENDOTA, CA 93640

For VOC Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	40 lbs

[ ] Conditions Attached

Method Of Reduction

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

SHUTDOWN OF A COTTON GIN

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.

Seyed Sadredin, Executive Director / APCO

David Warner, 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-794-2

ISSUED TO: EAGLE VALLEY GINNING LLC

ISSUED DATE: April 30, 2007

LOCATION OF REDUCTION: 39936 W NORTH AVE
MENDOTA, CA 93640

For NOx Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	734 lbs

[ ] Conditions Attached

Method Of Reduction

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

SHUTDOWN OF A COTTON GIN

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.

Seyed Sadredin, Executive Director / APCO

David Warner, 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-794-3

ISSUED TO: EAGLE VALLEY GINNING LLC

ISSUED DATE: April 30, 2007

LOCATION OF REDUCTION: 39936 W NORTH AVE
MENDOTA, CA 93640

For CO Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	147 lbs

[ ] Conditions Attached

Method Of Reduction

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

SHUTDOWN OF A COTTON GIN

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.

Seyed Sadredin, Executive Director / APCO

David Warner, 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-794-4

ISSUED TO: EAGLE VALLEY GINNING LLC

ISSUED DATE: April 30, 2007

LOCATION OF REDUCTION: 39936 W NORTH AVE
MENDOTA, CA 93640

For PM10 Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	18,935 lbs

[ ] Conditions Attached

Method Of Reduction

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

SHUTDOWN OF A COTTON GIN

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.

Seyed Sadredin, Executive Director / APCO

David Warner, 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-794-5

ISSUED TO: EAGLE VALLEY GINNING LLC

ISSUED DATE: April 30, 2007

LOCATION OF REDUCTION: 39936 W NORTH AVE
MENDOTA, CA 93640

For SOx Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	5 lbs

[ ] Conditions Attached

Method Of Reduction

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

SHUTDOWN OF A COTTON GIN

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.

Seyed Sadredin, Executive Director / APCO

David Warner, Director of Permit Services

PROJECT ROUTING FORM

FACILITY NAME: EAGLE VALLEY GINNING LLC

FACILITY ID: C-213 PROJECT NUMBER: C-1063777

PERMIT #'s:

DATE RECEIVED: DECEMBER 18, 2006

PRELIMINARY REVIEW	ENGR	DATE	SUPR	DATE
A. Application Deemed Incomplete				
Second Information Letter				
B. Application Deemed Complete	DP	1/4/07	Jon	1/11/07
C. Application Pending Denial				
D. Application Denied				

ENGINEERING EVALUATION	INITIAL	DATE
E. Engineering Evaluation Complete	DP	3/20/07
F. Supervising Engineer Approval	Jon	3/20/07
G. Compliance Division Approval [✓] Not Required	ENG	
H. Applicant's Review of Draft Authority to Construct Completed [ ] 3-day Review [ ] 10-day Review [ ] No Review Requested		
I. Permit Services Regional Manager Approval		

DIRECTOR REVIEW: [ ] Not Required [ ] Required

DIRECTOR REVIEW	INITIAL	DATE
J. Preliminary Approval to Director To DW		
K. Final Approval to Director To DW	Apr 30 2007 AD	

NSPS/NESHAP TRIGGERED: [ ] Yes [ ] No

If "Yes" then do the following:

1. Complete form (on AIRnet at Per » General » Internal Forms : Miscellaneous: NSPS/NESHAP Report) and attach copy to engineering evaluation.
2. Send or email form to Compliance (Tanya Good) after management approval of project.

(3P)

☐ NORTHERN REGION
☒ CENTRAL REGION
☐ SOUTHERN REGION

ERC/PUBLIC NOTICE CHECK LIST

PROJECT #s: C-1063777

REQST.	COMPL.	
		ERC TRANSFER OF PREVIOUSLY BANKED CREDITS
		ERC PRELIMINARY PUBLIC NOTICE
√		ERC FINAL PUBLIC NOTICE
		NSR/CEQA PRELIMINARY PUBLIC NOTICE
		NSR/CEQA FINAL PUBLIC NOTICE

√ ☒ Newspaper Notice Emailed to Clerical (Check box and tab to generate Notice)

ENCLOSED DOCUMENTS REQUIRE:

__ __ Enter Correct Date, Print All Documents from File and Obtain Directors Signature

√ __ Send ***FINAL*** Notice Letters to CARB, EPA and Applicant; Including the Following Attachments: __ Application Evaluation
√ Other Public Notice

√ __ Send ***FINAL*** Public Notice for Publication to Fresno Bee

√ __ Send Signed Copies of ***FINAL*** Notice Letters to Regional Office Attn: Darrin Pampaian

√ __ Director's Signature and District Seal Embossed on ERC Certificates

√ __ Director's Signature on Cover Letter and Mail Cover Letter & ERC Certificates by Certified Mail to:
√ Applicant:
√ Applicant and Additional Addressees (see cover letters)
__ Other

√ __ Send Copies of Signed and Seal Embossed ERC Certificates and Signed cover letter to Regional Office Attn: Darrin Pampaian

√ __ Assign Mailing Date: ID# C-213 Project #: C-1063777
__ __ Other Special Instructions (please specify): _____

Date Completed April 30, 2007 /By Joven Refuerzo

PUBLIC NOTICE

#26368

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 Eagle Valley Ginning, LLC for emission reductions generated by the shutdown of a cotton gin, at 39936 W. North Ave., in Mendota. The quantity of ERCs to be issued is 40 lb-VOC-yr, 734 lb-NOx/yr, 147 lb-CO/yr, 18,935 lb-PM10/yr, and 5 lb-SOx/yr.

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

The application review for Project #C-1063777 is available for public inspection at the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.

(PUB: May 7, 2007)

DP

Proofreaders Copy

DP

SAN JOAQUIN VALLEY APCD

ATTN FINANCE DEPARTMENT

1990 E GETTYSBURG AVE

FRESNO , CA 93726

PROOF OF PUBLICATION

COUNTY OF FRESNO
STATE OF CALIFORNIA

EXHIBIT A.

PUBLIC NOTICE

#26368

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 Eagle Valley Ginning, LLC for emission reductions generated by the shutdown of a cotton gin, at 39936 W. North Ave., in Mendota. The quantity of ERCs to be issued is 40 lb-VOC-yr, 734 lb-NOx/yr, 147 lb-CO/yr, 18,935 lb-PM10/yr, and 5 lb-SOx/yr.

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

The application review for Project #C-1063777 is available for public inspection at the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.

(PUB: May 7, 2007)

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.

May 7, 2007

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

Dated MAY 7, 2007

Cathy Aguilera

FPROOFAD

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

MAY - 1 2007

Bob Lange
Eagle Valley Ginning, LLC
27480 S. Bennett Rd.
Firebaugh, CA 93622

RE: Notice of Final Action - Emission Reduction Credits
Project Number: C-1063777

Dear Mr. Lange:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Eagle Valley Ginning, LLC for emission reductions generated by the shutdown of a cotton gin, at 39936 W. North Ave., in Mendota. The quantity of ERCs to be issued is 40 lb-VOC-yr, 734 lb-NOx/yr, 147 lb-CO/yr, 18,935 lb-PM10/yr, and 5 lb-SOx/yr.

Enclosed are 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 March 28, 2007. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on March 21, 2007. 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 60 days.

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

Sincerely,

David Warner
Director of Permit Services

DW:dp

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

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

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

www.valleyair.org

San Joaquin Valley
Unified Air Pollution
Control District

Due Date	Amount Due
5/30/2007	$ 949.60

Amount Enclosed

ERCFEE
213 C111260 4/30/2007

RETURN THIS TOP PORTION ONLY, WITH REMITTANCE TO:

EAGLE VALLEY GINNING LLC
27480 S BENNETT RD
FIREBAUGH, CA 93622

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

Thank You!

San Joaquin Valley
Unified Air Pollution
Control District

SJVAPCD Tax ID: 77-0262563

Facility ID	Invoice Date	Invoice Number
C213	4/30/2007	C111260

Invoice Type
Project: C1063777

EAGLE VALLEY GINNING LLC
39936 W NORTH AVE
MENDOTA, CA 93640

PROJECT NUMBER: 1063777

APPLICATION FILING FEES	$ 650.00
ENGINEERING TIME FEES	$ 949.60
TOTAL FEES	$ 1,599.60
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.)	**$ 949.60**

San Joaquin Valley Air Pollution Control District

Invoice Detail

Facility ID: C213

EAGLE VALLEY GINNING LLC
39936 W NORTH AVE
MENDOTA, CA 93640

Invoice Nbr: C111260
Invoice Date: 4/30/2007
Page: 1

Application Filing Fees

Project Nbr	Permit Number	Description	Application Fee
C1063777	C-213-1063777-0	Emission Reduction Credit Banking Evaluation Fee	$ 650.00
		Total Application Filing Fees:	**$ 650.00**

Engineering Time Fees

Project Nbr	Quantity	Rate	Description	Fee
C1063777	18.6 hours	$ 86.00 /h	Standard Engineering Time	$ 1,599.60
			Less Credit For Application Filing Fees	($ 650.00)
			Standard Engineering Time SubTotal	$ 949.60
			Total Engineering Time Fees:	**$ 949.60**

Fresno Bee

NOTICE OF FINAL ACTION
FOR THE ISSUANCE OF
EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Eagle Valley Ginning, LLC for emission reductions generated by the shutdown of a cotton gin, at 39936 W. North Ave., in Mendota. The quantity of ERCs to be issued is 40 lb-VOC-yr, 734 lb-NOx/yr, 147 lb-CO/yr, 18,935 lb-PM10/yr, and 5 lb-SOx/yr.

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

The application review for Project #C-1063777 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

MAY - 1 2007

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-1063777

Dear Mr. Tollstrup:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Eagle Valley Ginning, LLC for emission reductions generated by the shutdown of a cotton gin, at 39936 W. North Ave., in Mendota. The quantity of ERCs to be issued is 40 lb-VOC-yr, 734 lb-NOx/yr, 147 lb-CO/yr, 18,935 lb-PM10/yr, and 5 lb-SOx/yr.

Enclosed are copies of the ERC Certificates and a copy of the notice of final action to be published approximately three days from the date of this letter.

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

Sincerely,

David Warner
Director of Permit Services

DW:dp

Enclosures

Seyed Sadredin
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www.valleyair.org

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

MAY - 1 2007

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-1063777

Dear Mr. Rios:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Eagle Valley Ginning, LLC for emission reductions generated by the shutdown of a cotton gin, at 39936 W. North Ave., in Mendota. The quantity of ERCs to be issued is 40 lb-VOC-yr, 734 lb-NOx/yr, 147 lb-CO/yr, 18,935 lb-PM10/yr, and 5 lb-SOx/yr.

Enclosed are copies of the ERC Certificates and a copy of the notice of final action to be published approximately three days from the date of this letter.

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

Sincerely,

David Warner
Director of Permit Services

DW:dp

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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2700 M Street, Suite 275
Bakersfield, CA 93301-2373
Tel: (661) 326-6900 FAX: (661) 326-6985

www.valleyair.org

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:

Bob Lange
Eagle Valley Ginning, LLC
27480 S. Bennett Rd.
Firebaugh, CA 93622

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* | C. Date of Delivery

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

7006 3450 0000 0414 5528

7006 3450 0000 0414 5528 ERC Proj. #C-1063777

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

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Bob Lange
Eagle Valley Ginning, LLC
27480 S. Bennett Rd.
Firebaugh, CA 93622

PS Form 3800, August 2006 See Reverse for Instructions

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement *"Restricted Delivery"*.
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 *(Reverse)* PSN 7530-02-000-9047

UNITED STATES POSTAL SERVICE

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

SAN JOAQUIN VALLEY APCD
ATTN PERMIT SERVICES
1990 E. GETTYSBURG AVE.
FRESNO, CA 93726-0244

RECEIVED
MAY - 4 2007
Permits Srvc
SJVAPCD

Attn: Darrin Pampaian

San Joaquin Valley Air Pollution Control District
ERC Application Final Review
Cotton Gin

Facility Name:	Eagle Valley Ginning, LLC	Date:	March 20, 2007
Mailing Address:	27480 S. Bennett Rd. Firebaugh, CA 93622	Engineer:	Darrin Pampaian
		Lead Engineer:	Joven Refuerzo
Contact Person:	Bob Lange		
Telephone:	(209) 364-6162		
Project #:	C-1063777		
Submitted:	December 18, 2006		
Deemed Complete:	December 29, 2006		

I. Summary:

The primary business of this facility is a cotton ginning. Eagle Valley Ginning, LLC has surrendered their Permit to Operate C-0213-1-5 following the permanent shutdown of the operation as of December 14, 2006 and has submitted an application to bank the emission reduction credits (ERCs) for the decreased emissions. A copy of the surrendered Permit to Operate (PTO) is included in Attachment I of this report.

The following emission reductions have been found to qualify for ERC banking certificates C-794-1 (VOC), C-794-2 (NO_X), C-794-3 (CO), C-794-4 (PM_{10}), and C-794-5 (SO_X):

Summary of ERC Amounts					
	VOC	**NO_X**	**CO**	**PM_{10}**	**SO_X**
ERC Number	**C-794-1**	**C-794-2**	**C-794-3**	**C-794-4**	**C-794-5**
1st Quarter	**0**	**0**	**0**	**0**	**0**
2nd Quarter	**0**	**0**	**0**	**0**	**0**
3rd Quarter	**0**	**0**	**0**	**0**	**0**
4th Quarter	**40**	**734**	**147**	**18,935**	**5**

II. Applicable Rules:

Rule 2201 New and Modified Stationary Source Review Rule (9/21/06)
Rule 2301 Emission Reduction Credit Banking (12/17/92)

III. Location of Reduction:

The physical location of the equipment involved with this application is 39936 W. North Ave. in Mendota, CA.

IV. Method of Generating Reductions:

The emissions reduction is generated by the shutdown of a permitted cotton ginning operation. At this facility the unloading system was controlled by 1D-3D cyclones, the 1A, 1B, 2A, and 2B pre-cleaning, the overflow, main trash, feeder trash, motes and motes transfer systems were controlled by 2D-2D cyclones, and the 1st and 2nd stage lint cleaning systems were controlled with a screen room. The gin was limited by permit condition to a ginning rate of 480 bales per day and 48,000 bales per year. The applicant surrendered their PTO on December 14, 2006 as part of this application (see Attachment II).

V. Calculations:

A. Assumptions and Emission Factors

Assumptions:

- PM_{10} emissions assumed to equal 50% of PM emissions, per NSR Section 4.11.2.
- Annual emissions will be rounded to the nearest pound in accordance with the District Policy APR-1105 (dated 7/16/1992).
- The exhaust from the burners flows through the process air and exits at the cyclone collectors. In this case, PM_{10} amounts exhausted from the cyclones include emissions from both the burners and the ginning process. Therefore, the ginning PM_{10} emissions are not added to those calculated for the burners to determine the HAE.
- Bales are standardized to 500 lb/bale.
- Natural Gas Heating Value is 1,000 Btu/scf (District Policy APR-1720, dated 12/20/01).
- One therm of natural gas is equal to 0.100 MMBtu.
- F-Factor for Natural Gas is 8,578 dscf/MMBtu corrected to 60°F (40 CFR 60, Appendix B).
- Hourly throughput rate is 20 bales/hr, calculated as 480 bales/day (permit limit) ÷ 24 hrs/day)

Emission Factors:

The gin is permitted to fire their burners on both natural gas and LPG/propane, however the fuel records that were provided by the facility indicate that natural gas was the only fuel combusted for the last five years. Therefore, only emission factors for natural gas combustion will be used to determine facility's emissions.

The gin equipment included burners providing heated air to control the moisture content of the cotton. These burners were fired on natural gas and ERCs are requested from their shutdown. The PTO does not indicate natural gas combustion emission factors for SO_X and VOC, so AP-42 Emissions Factors and P G & E historical sulfur concentration tests shall be used (see Attachment III).

The SO_X EF for natural gas combustion is 0.00285 lb-SO_x/MMBtu, as identified in District Policy APR 1720 - Generally Accepted SO_X Emission Factor for Combustion of PUC-quality Natural Gas (dated 12/20/01).

Per previous EPA comments and District Policy APR 1110 - Use of Revised Emission Factors (dated 4/28/04), the SO_X EF will be revised according to P G & E's historical records of sulfur concentration in their pipelines. Therefore the SO_X EF will be calculated using 0.25 gr-S/100 scf as follows:

SO_X EF (lb/MMBtu) = (0.25 gr-S/100 scf) x (1 scf/1,000 Btu) x (1 x10^6 Btu/MMBtu) x (1 lb/7,000 gr) x (2 SO_2/S)

SO_X EF = 0.00071 lb-SO_X/MMBtu

AP-42 (07/98) Table 1.4-2 lists the VOC emission factor for the combustion of natural gas as 0.0055 lb/MMBtu. This value will be used to determine VOC emissions from the burners.

Natural Gas Emission Factors		
Pollutant	EF (lb/MMBtu)	Source
VOC	0.0055	AP-42 (07/98) Table 1.4-2
NO_X	0.1	Current Permit
CO	0.02	Current Permit
SO_X	0.00071	P G & E Gas Line Source Tests

The PTO specifies an EF of 1.67 lb-PM_{10}/bale (Attachment I, permit condition 8). The facility was also never required to perform source tests of specific cyclone systems at the facility. In the absence of other data the District generally uses emission factors from the California Cotton Ginners Association (CCGA) emission factor handbook to represent PM_{10} emissions from gins in the San Joaquin Valley, since the handbook is a compilation of source tests of San Joaquin Valley cotton gins.

All three sources of emissions factors are compared in the following table. Generally, the District uses the most accurate information available. For instance, where facility-specific source test data is available, we will use it (unless it is in violation of permit conditions or other requirements). The next most accurate information that exists is the data from the Cotton Ginners handbook, because it is based on a compilation of emissions factors. However, where a conflict exists between the data that are not based on facility-specific source tests, we will use the more conservative emissions factor to determine the amount of ERCs available for banking. See the following table for specific explanations.

Comparison of CCGA Emission Factors Handbook Summary, Permitted Emissions Factors, Engineering Evaluation Emissions Factors, and Source Testing Emissions Factors							
Gin Type: SAW							
System	Cyclone Design	CCGA Handbook EFs, version 1.5 (lb-PM_{10}/bale)		PTO EFs (lb-PM_{10}/bale)	Engineering Evaluation EFs (lb-PM_{10}/bale)	Source Testing EFs (lb-PM_{10}/bale)	Proposed EFs (lb-PM_{10}/bale)
		Current EFs					
		Average	Average + S. D.				
Unloading (Wagon and Module Feeder)	1D-3D	0.11	0.15	--	**0.11**	--	0.11
#1 Precleaning (1A and 2A)	2D-2D	0.29	0.54	--	**0.29**	--	0.29
#2 Precleaning (1B and 2B)	2D-2D	0.21	0.41	--	**0.23**	--	0.23
Overflow	2D-2D	N/A[1]		--	**0.06**	--	0.06
Main Trash (Stick Machines and Unloading Collectors Trash)	2D-2D	N/A[2]		--	**0.08**	--	0.08
Feeders, Gin Stands, and Battery Condenser	Screen Basket	N/A[3]		--	**0**	--	0
#1 Stage Lint Cleaning	Screen Basket	0.48	0.48	--	**0.23**		0.23
#2 Stage Lint Cleaning	Screen Basket	0.30	0.30	--	**0.23**		0.23
Battery Condenser	Screen Basket	0.17	**0.17**	--	0.17		0.17
Feeder Trash (Gin Stand Feeder Trash)	2D-2D	0.04	**0.04**	--	0	--	0.04
Motes System	2D-2D	0.25	0.40	--	**0.23**	--	0.23
Motes Transfer System	2D-2D	N/A[4]		--	**0.04**	--	0.04
			Totals	1.67	1.67	N/A[5]	1.71

As shown above, the total emissions factor for this cotton gin is 1.71 lb-PM_{10}/bale. This is greater than the total emissions factor of 1.67 lb-PM_{10}/bale specified on the current PTO. Therefore, the more conservative figure of 1.67 lb-PM_{10}/bale will be used to determine the amount of ERCs available for banking.

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[1]There is not a specific CCGA EF that applies to overflow systems on saw type gins with 2D-2D cyclones.
[2]There is not a specific CCGA EF that applies to main trash systems on saw type gins with 2D-2D cyclones.
[3]There is not a specific CCGA EF that applies to 1st and 2nd stage lint cleaning and battery condenser systems on saw type gins with screen baskets.
[4]There is not a specific CCGA EF that applies to motes transfer systems on saw type gins with 2D-2D cyclones.
[5]There has been no source testing of any of the equipment at this facility.

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" (District Rule 2201, Section 3.8).

According to District Policy APR-1810 (dated 9/9/92), the date of shutdown for permitted sources shall be the date of surrender of the operating permits, unless otherwise determined as stated in the policy. The applicant has provided the historical ginning records for the 2002, 2003, 2004, 2005, and 2006 ginning seasons as presented in the following table and shown in Attachment IV.

Historical Throughput and Fuel Use for the Cotton Gin			
Season Start Date	Season End Date	Bales Produced (500 lb bales)	Natural Gas Usage (therms)
		4th and 1st Quarter Season	4th and 1st Quarter Season
October 8, 2002	December 11, 2002	23,558	72,403
October 17, 2003	January 12, 2004	31,090	90,708
October 4, 2004	January 11, 2005	34,254	47,779
October 13, 2005	December 19, 2005	22,834	38,390
October 13, 2006	N/A	0	60
5 Year Average:		**22,347**	**49,868**

During the five years of operation prior to the ERC application the facility operated in the first quarter in only the 2003 and 2004 seasons. The facility has only provided data for bales produced and natural gas usage on a seasonal basis but cotton gins typically operate 24 hours per day, seven days a week until all on the cotton from the previous growing season is ginned. As required by District Rule 2201, "normal" source operation for the eight consecutive calendar quarter periods that most closely represents the five year average must be determined. Therefore, the prorated amount of bales produced and natural gas usage based on days of operation during the ginning season will be calculated for the 2003 and 2004 seasons only.

Prorating Bale Production and Natural Gas Usage for the 4th and 1st Quarters for the 2003 Season:

There were a total of 88 days of operation for the 2003 season (15 days in October + 30 days in November + 31 days in December + 12 days in January). Of this total, 76 days of operation occurred in the 4th quarter (88 total days – 12 days in January) and 12 days of operation occurred in the 1st quarter. Therefore, the calculated bales produced and natural gas usage for 4th and 1st quarters for the 2003 season is calculated as follows:

Bale Production:

4th Qtr, Bale Production (bales/qtr) = 31,090 bales in the 2003 season x (76 4th quarter days ÷ 88 total days)
4th Qtr, Bale Production = 26,850 bales/qtr

1st Qtr, Bale Production (bales/qtr) = 31,090 bales in the 2003 season x (12 4th quarter days ÷ 88 total days)
1st Qtr, Bale Production = 4,240 bales/qtr

Fuel Usage:

4th Qtr, Fuel Usage (therms/qtr) = 90,708 therms in the 2003 season x (76 4th quarter days ÷ 88 total days)
4th Qtr, Fuel Usage = 78,339 therms/qtr

1st Qtr, Fuel usage (therms/qtr) = 90,708 therms in the 2003 season x (12 4th quarter days ÷ 88 total days)
1st Qtr, Fuel Usage = 12,369 therms/qtr

Prorating Bale Production and Natural Gas Usage for the 4th and 1st Quarters for the 2004 Season:

There were a total of 100 days of operation for the 2004 season (28 days in October + 30 days in November + 31 days in December + 11 days in January). Of this total, 89 days of operation occurred in the 4th quarter (100 total days – 11 days in January) and 11 days of operation occurred in the 1st quarter. Therefore, the calculated bales produced and natural gas usage for 4th and 1st quarters for the 2004 season is calculated as follows:

Bale Production:

4th Qtr, Bale Production (bales/qtr) = 34,254 bales in the 2004 season x (89 4th quarter days ÷ 100 total days)
4th Qtr, Bale Production = 30,486 bales/qtr

1st Qtr, Bale Production (bales/qtr) = 34,254 bales in the 2004 season x (11 4th quarter days ÷ 100 total days)
1st Qtr, Bale Production = 3,768 bales/qtr

Fuel Usage:

4th Qtr, Fuel Usage (therms/qtr) = 47,779 therms in the 2004 season x (89 4th quarter days ÷ 100 total days)

4th Qtr, Fuel Usage = 42,523 therms/qtr

1st Qtr, Fuel usage (therms/qtr) = 47,779 therms in the 2004 season x (11 4th quarter days ÷ 100 total days)

1st Qtr, Fuel Usage = 5,256 therms/qtr

Baseline Determination for the Cotton Gin		
Calendar Quarter	Cotton Bale Production (500 lb bales)	Eight Quarter Difference for Cotton Bale Production (500 lb bales)
1st 2002	0	N/A
2nd 2002	0	N/A
3rd 2002	0	N/A
4th 2002	23,558	N/A
1st 2003	0	N/A
2nd 2003	0	N/A
3rd 2003	0	N/A
4th 2003	26,850	**714**
1st 2004	4,240	1,244
2nd 2004	0	1,244
3rd 2004	0	1,244
4th 2004	30,486	2,110
1st 2005	3,768	2,581
2nd 2005	0	2,581
3rd 2005	0	2,581
4th 2005	22,834	2,079
1st 2006	0	1,549
2nd 2006	0	1,549
3rd 2006	0	1,549
4th 2006	0	2,262
Average:	**5,587**	

The values in the columns labeled "Eight Quarter Difference" represent the absolute value of the difference between the facility's quarterly cotton bale production averaged over the last 5 years since the date the application was submitted and the quarterly throughput averaged over the previous eight consecutive calendar quarters starting with Q4 1998. The smallest "difference" is assumed to be the eight consecutive calendar quarter periods that most closely represents "normal" source operation. For this ERC

application the most recent representative eight consecutive calendar quarters for cotton bale production are from the 1st quarter of 2002 to the 4th quarter of 2003. These are the most recent eight consecutive calendar quarters out of the past five years that the cotton gin was operating and most closely represent the last five years of operation of the cotton gin. Based on the ginning records provided, the average bale throughput and the average natural gas usage from the representative two years (2002 and 2003) for the ERC application are calculated as follows:

Average Bale Throughput (bales/yr) = [2002 (bales/yr) + 2003 (bales/yr)] ÷ 2
Average Bale Throughput bales/yr = (23,558 bales/yr + 31,090 bales/yr) ÷ 2
Average Bale Throughput = 27,324 bales/yr

Average Natural Gas Usage (therms/yr) = [2002 (therms/yr) + 2003 (therms/yr)] ÷ 2
Average Natural Gas Usage therms/yr = (72,403 therms/yr + 90,708 therms/yr) ÷ 2
Average Natural Gas Usage = 81,556 therms/yr

With one therm of natural gas is equal to 100,000 Btu:

Average Natural Gas Usage Btu/yr = 81,556 therms/yr x 0.100 MMBtu/therm
Average Natural Gas Usage = 8,156 MMBtu/yr

The baling production for 2002 and 2003 was based upon annual records. The same 2002 and 2003 baseline period was used for historic natural gas fuel usage. The facility has not been operated since the 2005 season; therefore the total bale throughput and propane usage for the 2006 season is equal to zero and will not be used to calculate the baseline emissions.

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 3.21.

PM_{10}:

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.

4th Qtr, HAE for PM_{10} lb/qtr = 1.23 lb-PM_{10}/bale x 27,324 bales/qtr
4th Qtr, HAE for PM_{10} = 33,609 lb-PM_{10}/qtr

Adding the HAE from the dryers and ginning operation produces the HAE totals. Because the exhaust from the burners flows through the process air and exits at the cyclone collectors, PM_{10} amounts exhausted from the cyclones include emissions from the dryers and the ginning process. Therefore, the PM_{10} emissions from the dryers are not added to those calculated for the ginning operation to determine the HAE.

VOC, NO_X, CO, and SO_X:

The HAE for is calculated using emission factors for natural gas combustion from EPA's AP-42, the current PTO, and District Policy 1720, and the average natural gas use during the baseline period. The cotton gin was only operated during the fourth and first quarter of each year.

Historical Average Natural Gas Usage (MMBtu/yr) = 8,156 MMBtu/yr

HAE_{NG} (lb/qtr) = EF_{NG} (lb/MMBtu) x Historical Natural Gas Usage (MMBtu/yr) x (Days of Operation/qtr ÷ Total Days of Operation)

4^{th} Qtr, HAE for VOC_{NG} (lb/qtr) = (0.0055 lb-VOC/MMBtu) x 8,156 MMBtu/yr
4^{th} Qtr, HAE for VOC_{NG} = 45 lb-VOC/qtr

4^{th} Qtr, HAE for $NO_{X\,NG}$ lb/qtr = (0.1 lb-NO_X/MMBtu) x 8,156 MMBtu/yr
4^{th} Qtr, HAE for $NO_{X\,NG}$ = 816 lb-NO_X/qtr

4^{th} Qtr, HAE for CO_{NG} lb/qtr = (0.02 lb-CO/MMBtu) x 8,156 MMBtu/yr
4^{th} Qtr, HAE for CO_{NG} = 163 lb-CO/qtr

4^{th} Qtr, HAE for $SO_{X\,NG}$ lb/qtr = (0.00071 lb-SO_X/MMBtu) x 8,156 MMBtu/yr
4^{th} Qtr, HAE for $SO_{X\,NG}$ = 6 lb-SO_X/qtr

HAE for Natural Gas Combustion	
Pollutant	4^{th} Qtr. HAE_{NG} (lb/qtr)
VOC	45
NO_X	816
CO	163
SO_X	6

D. Adjustments to HAE

Pursuant to Section 3.22 of Rule 2201, Historical Actual Emissions must be discounted for any emissions reduction which is:

- required or encumbered by any laws, rules, regulations, agreements, orders, or
- attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan, or
- proposed in the District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act.

Emissions Adjusted for Emission Factor Determination:

Rule 4204 Cotton Gins was adopted on February 17, 2005 and requires cotton gins to use 1D-3D cyclones with emissions equivalent to the emission factors from the latest revision of the CCGA handbook. The emission factors from the current valid permit will be adjusted in accordance with District Rule 2201 in the Section titled *Emissions Adjusted for Rule 4204 – Cotton Gins* of this evaluation.

Emissions Adjusted for Rule 4201 - Particulate Matter Concentration:

According to Section 3.1 particulate matter (PM) emissions from each source operation should not exceed 0.1 grains per cubic foot of gas at dry standard conditions. The calculation is based on a 20 bales/hr ginning rate and the airflow through the control device. The airflow for each system is taken from District project C-1021007 (see Attachment V). Emission Factors are taken from the ones presented in Section VII.B. The following equation is used to determine the grain loading for each system and the results are listed in following table.

Baling Rate = 480 bales/day = 20.0 bales/hr

$$PM_{10}\ (gr/dscf) = \frac{(lb\text{-}PM_{10}/bale) \times (7000\ gr/lb\text{-}PM_{10}) \times (2\ lb\text{-}PM/lb\text{-}PM_{10}) \times (20\ bales/hr)}{(scf/min) \times (60\ min/hr)}$$

PM Concentrations				
System	Control	EFs ($lb\text{-}PM_{10}$/bale)	Air Flow (cfm)	Grain Loading (grain/dscf)
Unloading	1D-3D	0.11	12,800	0.04
#1 Precleaning	1D-3D	0.11	15,042	0.03
#2 Precleaning	1D-3D	0.09	15,042	0.03
Overflow	1D-3D	0.04	4,594	0.04
Main Trash	1D-3D	0	7,521	0.0
Feeders, Gin Stands, and Battery Condenser	1D-3D	0	14,103	0.0
#1 Lint Cleaning	1D-3D	0.10	16,666	0.03
#2 Lint Cleaning	1D-3D	0.03	10,000	0.01
Battery Condenser	1D-3D	0.03	26,000	0.01
Feeder Trash	1D-3D	0.08	7,521	0.05
Motes System	1D-3D	0.07	13,349	0.02
Motes Transfer System	1D-3D	0.03	2,042	0.07

Since no concentration is above 0.1grain/dscf, no adjustment is needed.

Emissions Adjusted for Rule 4202 Particulate Matter - Emission Rate:

District Rule 4202 Particulate Matter – Emission Rate (12/17/92), 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 lbs of seed cotton per bale of finished cotton and drops to about 500 lbs of lint cotton per bale of finished cotton.

Below, emissions are checked at unloading, lint cleaning, and the battery condenser. Any adjustments will be subtracted from the EF based on the CCGA tables. In this case, since the permitted EF is higher than the CCGA EF, the new adjusted CCGA EF will be compared to the permit limit, and the lower number will be used.

Baling Rate = 480 bales/day = 20.0 bales/hr

1. Unloading:

For Process Rate (P) = 20.0 bales/hr x 1,500 lb/bale
= 30,000 lb/hr of seed cotton
= 15.0 tons/hr of seed cotton

The emissions limit (E), per District Rule 4202, is calculated as follows:

$E = 3.59 \times P^{0.62}$
$= 3.59 \times (15.0)^{0.62}$
= 19.2 lb-PM/hr

The emissions factor for unloading is 0.11 lb-PM_{10}/bale (1D-3D cyclone), per CCGA Emission Factors Summary Tables. Based on this emissions factor, the emission rate for unloading is 2.20 lb-PM_{10}/hr (20.0 bales/hr x 0.11 lb-PM_{10}/bale). Assuming 50% of PM is PM_{10}, this is equivalent to a PM emission rate of 4.4 lb-PM/hr. Therefore, the PM emissions are within the allowable limits of this Rule.

2. Lint Cleaner:

The District has contacted the CCGA and requested the information of the process weights for lint cleaning. The CCGA has stated that they do not know the processing weights at the specified points. The process weights for these emission points will therefore be 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.

Emissions Factors:

Lint Cleaning: 0.10 lb-PM_{10}/bale + 0.03 lb-PM_{10}/bale = 0.13 lb-PM_{10}/bale
Battery Condenser: 0.03 lb-PM_{10}/bale

Assuming a 90% control efficiency for the cyclones and 50% of PM emissions are PM_{10}, we can determine the weight of material removed by the battery condenser and the lint cleaner:

Lint Cleaning:

Let X = lb-PM/bale (pre-lint cleaning) and assuming 90% control efficiency of the cyclone

Mass Balance: X x (1 - 0.90) = 0.13 lb PM/bale
= 0.13 lb PM/bale ÷ 0.10
X = 1.3 lb PM/bale

Battery Condenser:

Let X = lb-PM/bale (pre-battery condenser) and assuming 90% control efficiency of the cyclone

Mass Balance: X x (1 - 0.90) = 0.03 lb PM/bale
= 0.03 lb PM/bale ÷ 0.10
X = 0.3 lb PM/bale

Therefore, the process weight of the bale when it entered the lint cleaner was ≈ 501.6 lbs (500 + 1.3 + 0.3) and approximately 1.3 lbs of material was removed by the lint cleaner. The battery condenser process weight is ≈ 500.3 lbs since approximately 1.3 lbs of material is removed by lint cleaner.

Lint Cleaner:

For Process Rate (P) = 20.0 bales/hr x 501.6 lb/bale
= 10,032 lb/hr of seed cotton
= 5.02 tons/hr

The emissions limit (E), per District Rule 4202, is calculated as follows:

$E = 3.59 \times P^{0.62}$
$= 3.59 \times (5.02)^{0.62}$
= 9.8 lb-PM/hr

The emissions factor for the Lint Cleaner is 0.13 lb PM_{10}/bale (1D-3D), based on source test information from similar gins, as compiled in the CCGA Factors summary tables. Based on this emissions factor, the emission rate for this lint cleaner is 2.6 lb-PM_{10}/hr (20.0 bales/hr x 0.13 lb-PM_{10}/bale). Assuming 50% of PM is PM_{10}, this is equivalent to a PM emission rate of 5.2 lb-PM/hr. Therefore, the PM emissions are not above the allowable Rule limits, and adjustment is not necessary for the lint cleaner.

3. Battery Condenser:

For Process Rate (P) = 20.0 bales/hr x 500.3 lb/bale
= 10,006 lb/hr of seed cotton
= 5.00 tons/hr

The emissions limit (E), per District Rule 4202, equals
$E = 3.59 \times P^{0.62}$
$= 3.59 \times (5.00)^{0.62}$
= 9.7 lb-PM/hour

The emissions factor for the battery condenser is 0.03 lb PM_{10}/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 the battery condenser is 0.60 lb-PM_{10}/hr (20.0 bales/hr x 0.03 lb-PM_{10}/bale). Assuming 50% of PM is PM_{10}, this is equivalent to a PM emission rate of 1.2 lb-PM/hr. Therefore, the PM emissions are not above the allowable Rule limits, and adjustment is not necessary for the battery condenser.

Emissions Adjusted for Rule 4204 - Cotton Gins:

Rule 4204 Cotton Gins was adopted on February 17, 2005 and requires cotton gins to use 1D-3D cyclones, with emissions equivalent to the emission factors from the latest revision of the CCGA handbook, by July 1, 2008. Pursuant to Section 3.22 of Rule 2201, Historical Actual Emissions must be discounted for any emissions reduction which is: required or encumbered by any laws, rules, regulations, agreements, orders, or , proposed in the District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act. Therefore, even though the cotton gin was in compliance with this Rule at the time of the ERC application submittal, the amount of ERCs that will be allowed to be banked will be discounted for the future required compliance with this Rule.

Since at this facility the unloading system was controlled by 1D-3D cyclones, the 1A, 1B, 2A, and 2B pre-cleaning, the overflow, main trash, feeder trash, motes and motes transfer systems were controlled by 2D-2D cyclones, and the 1st and 2nd stage lint cleaning systems were controlled with a screen room, adjustments to the PM_{10} emission factors are necessary. The emission factors were compared to the current CCGA handbook emissions and source tested values as if the control devices were retrofitted to the gin. The most conservative emission factors were used and are listed in the following table:

Emission Factors Adjusted for Applicant/CCGA EFs					
Gin Type: SAW					
System	Current Cyclone Design	Required Cyclone Design	EFs from Current PTO and/or Engineering Evaluation (lb-PM_{10}/bale)	CCGA Average EFs Required by Rule 4204 (lb-PM_{10}/bale)	Adjusted EFs (lb-PM_{10}/bale)
Unloading (Wagon and Module Feeder)	1D-3D	1D-3D	0.11	**0.11**	0.11
#1 Precleaning (1A and 2A)	2D-2D	1D-3D	0.29	**0.11**	0.11
#2 Precleaning (1B and 2B)	2D-2D	1D-3D	0.23	**0.09**	0.09
Overflow	2D-2D	1D-3D	0.06	**0.04**	0.04
Main Trash (Stick Machines and Unloading Collectors Trash)	2D-2D	1D-3D	**0.08**	N/A[6]	0.08
Feeders, Gin Stands, and Battery Condenser	Screen Basket	1D-3D	**0**	0	0
#1 Stage Lint Cleaning	Screen Basket	1D-3D	0.23	**0.10**	0.10
#2 Stage Lint Cleaning	Screen Basket	1D-3D	0.23	**0.03**	0.03
Battery Condenser	Screen Basket	1D-3D	0.17	**0.03**	0.03
Feeder Trash (Gin Stand Feeder Trash)	2D-2D	1D-3D	0	**0.08**	0.08
Motes System	2D-2D	1D-3D	0.23	**0.07**	0.07
Motes Transfer System (Motes Cleaner Trash)	2D-2D	1D-3D	0.04	**0.03**	0.03
		Totals	1.67	0.69	**0.77**

The total emission factor for this cotton gin of 1.67 lb-PM_{10}/bale is greater than the adjusted emission factor of 0.77 lb-PM_{10}/bale. Therefore, the more conservative figure of 0.77 lb-PM_{10}/bale will be used to determine the amount of ERCs available for banking. Therefore, the emissions factor has been adjusted from 1.67 lb-PM_{10}/bale to 0.77 lb-PM_{10}/bale.

[6]There is not a specific CCGA EF that applies to main trash systems on saw type gins with 2D-2D cyclones.

Total Adjustment

The total adjustment is equal to the sum of the adjusted parts. In this case, the unloading equipment is controlled by 1D-3D cyclones and the rest of the equipment is controlled by 2D-2D cyclones. Therefore, an adjustment is necessary.

The PM_{10} calculation for the gin is now:

4th Qtr, HAE for PM_{10} (lb/qtr) = 0.77 lb-PM_{10}/bale x 27,324 bales/qtr
= 21,039 lb-PM_{10}/qtr

Emissions Adjusted for Rule 4309 - Dryers, Dehydrators, and Ovens:

District Rule 4309 Dryers, Dehydrators, and Ovens (12/15/05), Section 4.1.6, specifically exempts units used to dry lint cotton or cotton at cotton gins. The dryers at this facility are used to dry cotton therefore no adjustment is necessary.

Emissions Adjusted for Rule 4801 - Sulfur Compounds:

District Rule 4801 requires that a person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume calculated as SO_2, on a dry basis averaged over 15 consecutive minutes.

Using the ideal gas equation and the emission factors presented in Section V.A, the sulfur compound emissions are calculated as follows:

SO_X EF = 0.00071 lb-SO_X/MMBtu

$$\text{Volume } SO_2 = \frac{n \times R \times T}{P}$$

With:

N = moles SO_2
T (Standard Temperature) = 60 °F = 520 °R
P (Standard Pressure) = 14.7 psi
R (Universal Gas Constant) = $\frac{10.73\,\text{psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot {}^\circ\text{R}}$

EPA F-Factor for Natural Gas: 8,710 dscf/MMBtu at 68 °F, equivalent to:

$$Corrected\ F-factor = \left(\frac{8{,}710 dscf}{MMBtu}\right) \times \left(\frac{60^\circ F + 459.6}{68^\circ F + 459.6}\right) = 8{,}578 \frac{dscf}{MMBtu}\ at\ 60^\circ F$$

$$\frac{0.00071 \cdot lb - SOx}{MMBtu} \times \frac{MMBtu}{8{,}578\,dscf} \times \frac{1\,lb \cdot mol}{64\,lb} \times \frac{10.73\,psi \cdot ft^3}{lb \cdot mol \cdot °R} \times \frac{520°R}{14.7\,psi} \times \frac{1{,}000{,}000 \cdot parts}{million} = 0.49 \frac{parts}{million}$$

$$SulfurConcentration = 0.49 \frac{parts}{million} < 2{,}000 \text{ ppmv (or 0.2\%)},$$

Since the sulfur concentration of the natural gas fuel is less than 2,000 ppmv, no adjustment is needed.

Total Adjusted Historical Actual Emissions (HAE):

The total adjustment is equal to the sum of the adjusted parts. There were no adjustments made to the Historical Actual Emissions for NO_X, SO_X, CO, or VOC; however adjustments were made to the HAE for PM_{10}.

For PM_{10} emissions, the unloading equipment is controlled by 1D-3D cyclones and the rest of the equipment is controlled by 2D-2D cyclones, therefore emission factors were updated to be consistent with the 1D-3D cyclone requirements of Rule 4204, the most recent revision of the CCGA handbook, applicant proposed emissions factors, and source tested emission factors. The adjusted HAE for all criteria pollutants are calculated and presented in the following table.

Historical Average Natural Gas Usage (MMBtu/yr) = 8,156 MMBtu/yr

$HAE_{NOx, SOx, CO, and VOC}$ (lb/qtr) = EF_{NG} (lb/MMBtu) x Historical Natural Gas Usage (MMBtu/yr)

HAE_{PM10} (lb/qtr) = Adjusted EF lb-PM_{10}/bale x Average bales/qtr

4th Qtr, HAE for VOC_{NG} (lb/qtr) = (0.0055 lb-VOC/MMBtu) x 8,156 MMBtu/yr
4th Qtr, HAE for VOC_{NG} = 45 lb-VOC/qtr

4th Qtr, HAE for $NO_{X\,NG}$ lb/qtr = (0.1 lb-NO_X/MMBtu) x 8,156 MMBtu/yr
4th Qtr, HAE for $NO_{X\,NG}$ = 816 lb-NO_X/qtr

4th Qtr, HAE for CO_{NG} lb/qtr = (0.02 lb-CO/MMBtu) x 8,156 MMBtu/yr
4th Qtr, HAE for CO_{NG} = 163 lb-CO/qtr

4th Qtr, HAE for PM_{10} (lb/qtr) = 0.77 lb-PM_{10}/bale x 27,324 bales/qtr
4th Qtr, HAE for PM_{10} (lb/qtr) = 21,039 lb-PM_{10}/qtr

4th Qtr, HAE for $SO_{X\,NG}$ lb/qtr = (0.00071 lb-SO_X/MMBtu) x 8,156 MMBtu/yr
4th Qtr, HAE for $SO_{X\,NG}$ = 6 lb-SO_X/qtr

Total Adjusted Historical Actual Emissions (HAE)				
Pollutant	1st Qtr. HAE (lb/qtr)	2nd Qtr. HAE (lb/qtr)	3rd Qtr. HAE (lb/qtr)	4th Qtr. HAE (lb/qtr)
VOC	0	0	0	45
NO_X	0	0	0	816
CO	0	0	0	163
PM_{10}	0	0	0	21,039
SO_X	0	0	0	6

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 – PE2.

AER = HAE – PE2

4th Quarter Actual Emissions Reductions:

AER_{VOC} (lb/yr) = 45 lb-VOC/qtr – 0 lb-VOC/qtr = 45 lb-VOC/qtr
AER_{NOx} (lb/yr) = 816 lb-NO_X/qtr – 0 lb-NO_X/qtr = 816 lb-NO_X/qtr
AER_{CO} (lb/yr) = 163 lb-CO/qtr – 0 lb-CO/qtr = 163 lb-CO/qtr
AER_{PM10} (lb/yr) = 21,039 lb-PM_{10}/qtr – 0 lb-PM_{10}/qtr = 21,039 lb-PM_{10}/qtr
AER_{SOx} (lb/yr) = 6 lb-SO_X/qtr – 0 lb-SO_X/qtr = 6 lb-SO_X/qtr

Actual Emission Reductions (AER)				
Pollutant	1st Qtr. AER (lb/qtr)	2nd Qtr. AER (lb/qtr)	3rd Qtr. AER (lb/qtr)	4th Qtr. AER (lb/qtr)
VOC	0	0	0	45
NO_X	0	0	0	816
CO	0	0	0	163
PM_{10}	0	0	0	21,039
SO_X	0	0	0	6

F. Air Quality Improvement Deduction

The Air Quality Improvement Deduction (AQID) is 10% of the AER per Rule 2201, Sections 3.5 and 4.12.1, and is summarized as follows:

Air Quality Improvement Deduction (AQID)				
Pollutant	1st Qtr. AQID (lb/qtr)	2nd Qtr. AQID (lb/qtr)	3rd Qtr. AQID (lb/qtr)	4th Qtr. AQID (lb/qtr)
VOC	0	0	0	5
NO_X	0	0	0	82
CO	0	0	0	16
PM_{10}	0	0	0	2,104
SO_X	0	0	0	1

G. Increases in Permitted Emissions (IPE)

No IPE is associated with this project.

H. Bankable Emissions Reductions Credits

The bankable emissions reductions credits, presented in following table, 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).

Bankable Emissions Reductions Credits (ERCs)				
Pollutant	1st Qtr ERCs (lb/qtr)	2nd Qtr ERCs (lb/qtr)	3rd Qtr ERCs (lb/qtr)	4th Qtr ERCs (lb/qtr)
VOC	**0**	**0**	**0**	**40**
NO_X	**0**	**0**	**0**	**734**
CO	**0**	**0**	**0**	**147**
PM_{10}	**0**	**0**	**0**	**18,935**
SO_X	**0**	**0**	**0**	**5**

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 cotton ginning equipment. The emissions reductions were calculated from actual historic production data and recognized emission factors. The emission factor of 0.77 lb-PM_{10}/bale is based on the District Rule 4204 Cotton Gins (2/17/05) requirement of 1D-3D cyclones on all systems. Therefore, the allowed reductions are real.

B. Enforceable

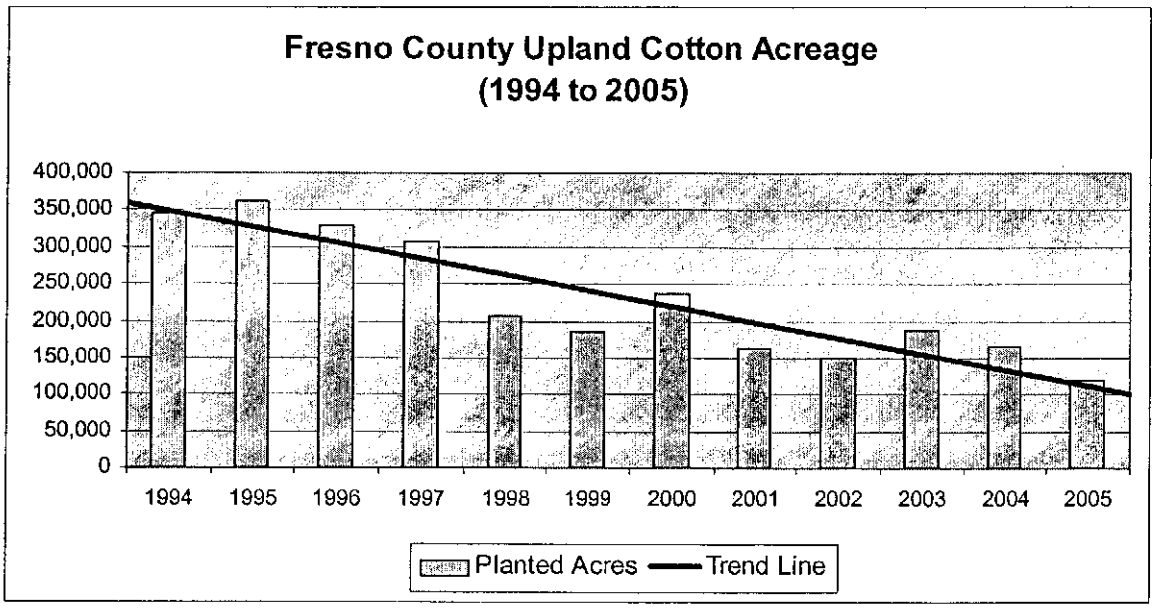
The PTO for this facility has been surrendered and the cotton gins cannot be operated without a valid PTO. Therefore, the reductions are enforceable.

C. Quantifiable

Reduction amounts were calculated from historic process throughput data, source test results from similar operations, CCGA 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. Much of the acreage that provided the gin with cotton in the past has been retired (several hundred thousand acres are being taken out of production in Western Fresno County due to water concerns) or replaced with almonds or pistachios. In addition, the increase in the number of dairies constructed in the valley has resulted in an increase in the planting of forage crops for dairies on land that was historically used to grow cotton. This has resulted in a reduction in cotton acreage. In addition, research by the District has shown that there has been a steady decrease in the planted acreage of upland cotton since 1994. Information for the following table was provided by Cantua Creek Cooperative Gin, Inc. for project C-1061965.



As documented in the preceding table and discussed in this Section, the overall trend of upland cotton acreage planted has declined over the past 12 years and is expected to continue to decline in the future. Therefore, it can be determined that the cotton that was being processed at the Eagle Valley Ginning, LLC gin is no longer being grown and the emissions reductions in this project are permanent.

E. Surplus

To be considered surplus, Actual Emission Reductions shall be in excess, at the time the application for an Emission Reduction Credit or an Authority to Construct authorizing such reductions is deemed complete, of any emissions reduction which:

- Is required or encumbered by any laws, rules, regulations, agreements, orders, or

No laws, rules, regulations, agreements or orders were responsible for the surrendering the facility's permits or their subsequent application for Emission Reduction Credits (ERC's).

- Is attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan, or

Currently there are no control measures noticed for workshop, or proposed or contained in a State Implementation Plan that require the reduction of the emissions at this facility.

- Is proposed in the APCO's adopted air quality plan pursuant to the California Clean Air Act.

The shutdown of cotton gins is not proposed in the APCO's adopted air quality plan.

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. By using 0.77 lb-PM_{10}/bale in our calculations for AER, we have assured that no credit was given for emissions that may have been in excess of the permitted limit of 1.67 lb-PM_{10}/bale. 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 – Emissions Reduction Credit Banking (12/17/92) 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 18, 2006. The applicant surrendered the PTO and permanently ceased operations at this location on December 14, 2006. Therefore, the application was submitted in a timely fashion.

VII. Recommendation:

I recommend based on the preceding analysis that Emission Reduction Credit Certificates be issued to Eagle Valley Ginning, LLC for the following applicable amounts for the fourth quarters only (see Attachment VI).

Summary of ERC Amounts					
	VOC	NO_X	CO	PM_{10}	SO_X
ERC Number	C-794-1	C-794-2	C-794-3	C-794-4	C-794-5
1st Quarter	0	0	0	0	0
2nd Quarter	0	0	0	0	0
3rd Quarter	0	0	0	0	0
4th Quarter	40	734	147	18,935	5

Attachments

Attachment I: Permit to Operate (C-0213-1-5)
Attachment II: Permit Cancellation Letter
Attachment III: Emission Factors for Natural Gas Combustion, AP-42, Table 1.4-2 and P G & E historical sulfur concentration tests
Attachment IV: Records of Bales Produced and Natural Gas Used
Attachment V: Cyclone System Airflows
Attachment VI: Draft ERC Certificates C-794-1, C-794-2, C-794-3, C-794-4, and C-794-5

Attachment I:
Permit to Operate C-0213-1-5

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-213-1-5 **EXPIRATION DATE:** 03/31/2010

EQUIPMENT DESCRIPTION:
COTTON GIN WITH THREE SAW GIN STANDS AND FEEDERS, SEVEN LINT CLEANERS, BATTERY CONDENSER, MOTES SYSTEM, TRASH SYSTEM, AND FOUR 3 MMBTU/HR NATURAL GAS-FIRED BURNERS

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
5. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
6. Daily ginning rate shall not exceed 120 tons of baled cotton per day (480 bales/day, corrected to 500-pound bales). [District Rule 2201]
7. Annual ginning rate shall not exceed 12,000 tons of baled cotton per year (48,000 bales/year, corrected to 500-pound bales). [District Rule 2201]
8. PM10 emissions shall not exceed 6.68 pounds per ton of baled cotton (1.67 pounds per bale, corrected to 500-pound bales). [District Rule 2201]
9. Emissions from the natural gas-fired burners shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.02 lb-CO/MMBtu. [District Rule 2201]
10. Unloading (wagon and module feeder) shall be served by two 48-inch 1D-3D cyclone collectors. [District Rule 2201]
11. The #1A pre-cleaning system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
12. The #1B pre-cleaning system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
13. The #2A pre-cleaning system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
14. The #2B pre-cleaning system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
15. The overflow shall be served by one 42-inch 2D-2D cyclone collector. [District Rule 2201]
16. Main trash system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
17. Feeder trash system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
18. Feeders, gin stands and battery condenser shall be served by three screen rooms. [District Rule 2201]
19. Motes shall be served by one 62-inch 2D-2D, one 32-inch 2D-2D, and one 28-inch 2D-2D cyclone collectors. [District Rule 2201]
20. Motes transfer shall be served by one 28-inch 2D-2D cyclone collector. [District Rule 2201]
21. Permittee shall maintain daily records of the number and weight of bales produced. [District Rule 1070]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

22. The trash loading area shall be enclosed with four sides that are higher than the trash auger. Two sides shall be solid. The remaining sides shall have flexible wind barriers that extend below the top of the trash trailer sides. [District Rule 4204]

23. Permittee shall conduct daily visual inspections of the material handling systems for leaks, breaks, or other visible signs of equipment malfunctions. [District Rule 4204]

24. Permittee shall maintain a record of the daily inspections of the material handling systems, including any equipment malfunctions discovered and corrective action taken to repair the malfunction, and any source test results. [District Rule 4204]

25. All records shall be retained on site for five years and made available to the District upon request. [District Rules 1070 and 4204]

Attachment II:
Permit Cancellation Letter

Eagle Valley Ginning LLC

December 14, 2006

Mr. Dave Warner
Director of Permit Services
San Joaquin Valley Unified Air Pollution Control District
1990 E. Gettysburg
Fresno, CA 93726

Re: **Shutdown of Eagle Valley Ginning LLC (PTO#: C-213-1-5)**

Dear Mr. Warner,

This letter is to officially notify you that the Eagle Valley Ginning LLC is shutting down, and hereby forfeiting, the permit to operate (PTO#: C-213-1-5) for the cotton gin located at 39936 W. North Avenue in Mendota, California.

Should you have any questions, please contact me at (209)364-6162.

Sincerely,

Bob Lange
Manager

C: Roger A. Isom, CCGGA

27480 S. Bennett Rd * Firebaugh, CA 93622 * Office 209.364.6162/559.655.4778 * Fax 209.364.6506 * evg@dospalos.org

Attachment III:
Emission Factors for Natural Gas Combustion, AP-42, Table 1.4-2 and P G & E historical sulfur concentration tests

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

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

[a] Reference 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 $lb/10^6$ scf to $kg/10^6$ m^3, multiply by 16. To convert from $lb/10^6$ scf to lb/MMBtu, divide by 1,020. The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. TOC = Total Organic Compounds. VOC = Volatile Organic Compounds.

[b] Based on approximately 100% conversion of fuel carbon to CO_2. $CO_2[lb/10^6 scf] = (3.67)(CON)(C)(D)$, where CON = fractional conversion of fuel carbon to CO_2, C = carbon content of fuel by weight (0.76), and D = density of fuel, $4.2x10^4$ $lb/10^6$ scf.

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

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

San Joaquin Valley
Unified Air Pollution Control District

Generally Accepted SOx Emission Factor for Combustion of PUC-quality Natural Gas

Approved By:	SIGN Seyed Sadredin Director of Permit Services	Date: 12/20/2001

Purpose: The purpose of this policy is to establish a consistent, representative, generally accepted emission factor for quantifying sulfur oxide emissions from the combustion of PUC-quality natural gas in the District.

I. Applicability:

For use when estimating emissions of SOx from the combustion of PUC-regulated and PUC quality natural gas.

II. Background:

SOx emissions from combustion of PUC-regulated and PUC quality natural gas is based on the sulfur content of the gaseous fuel. PUC-regulated natural gas is commercial pipeline natural gas transmitted and delivered throughout California by Pacific Gas and Electric, Southern California Edison, the Mojave Gas companies and others. PUC-quality natural gas is natural gas not transmitted in a PUC-regulated pipeline, but still meeting the same quality standards.

Natural gas is transmitted and distributed nationwide through a pipeline system. All pipeline systems distributing gas for other than private use are considered "public utilities" by definition, and are subject to the requirements of the Public Utilities Commission (PUC) for intrastate transmission and Federal Energy Regulatory Commission (FERC) regulations for interstate transmission.

In the past the District has used the SOx emission factor from EPA AP-42 Table 1.4-2 (rev. 1/95), of 0.6 lb SOx/MMscf of gas (as SO2), established based on mass balance, assuming an average sulfur content of 0.2 gr S/100 scf. However this emission factor may under estimate emissions from commercial pipeline natural gas in California.

Although natural gas with various sulfur contents (i.e. greater than 1 gr/100 scf) may enter the pipeline from individual producers within the state (up to 5 gr/100 scf is allowed by PUC General

Order 58-B), the natural gas suppliers (PG&E, SOCalGas, etc) regulate the quality of the gas supplied to consumers:

- Pacific Gas & Electric (PG&E) has a transportation agreement to deliver gas with a maximum total sulfur content of 1.0 gr/100 scf (actual: 0.3 to 0.5 gr/100 scf, based on source testing).
- Southern California Edison's (SoCalGas) Standard Specifications for Natural Gas and Substitute Fuel Gases (from SoCal Gas Company Procedures,12/26/85) has a recommended total sulfur limit of 0.75 gr/100 scf.
- Mojave Gas Company's FERC Gas Tariff General Terms and Conditions (12/30/91) requires delivered natural gas to contain no more than 0.75 gr/100 scf total sulfur.

The California Air Resource Board (ARB), in their document Guidance for Power Plant Siting (Stationary Source Div., 6/99), determined that 1.0 gr S/100 scf is the sulfur content of gas supplied by a utility regulated by the Public Utilities Commission (PUC).

District-issued federal permits (Title V permits) have generally used a sulfur content of 5 gr/100 scf of gas, as limited by General Order 58-B of the PUC, to estimate SOx emissions from commercial natural gas combustion, which highly over estimates actual SOx emissions.

II. District Approved Emission Factor for SOx from Natural Gas Combustion

As of the date of this policy, all calculations of SOx emissions from the combustion of PUC-regulated and PUC-quality natural gas shall use an emission factor of 0.00285 lb SOx/MMBtu (as SO_2), based on an natural gas HHV of 1000 Btu/scf and a total sulfur content of 1.0 gr/100 scf of gas. A total sulfur content of 1.0 gr/100 scf gas is conservatively high, thus guaranteeing compliance for PUC-regulated and PUC-quality natural gas, and is also more realistic than either EPA's AP-42 level of 0.2 gr S/100 scf or the PUC standard of 5 gr/100 scf.

Because this emissions factor is conservative and compliance is assured, no additional source testing or exhaust monitoring will be required to assure compliance with SOx emission limits based upon 1.0 gr S/100 scf gas when PUC-regulated gas is used.

III. Utilizing The New Emission Factor

See policy on use of revised generally accepted emission factors, APR 1110.

IV. Permit Exemption, District Rule 2020, 5.1.1

The permit exemption for natural gas-fired boilers less than 5 MMBtu/hr heat input (District Rule 2020 section 6.1.1) requires that the sulfur content of the natural gas be no greater than 0.75 gr S/100 scf. For the purpose of determining compliance with this section, the District considers commercially available natural gas as equivalent to 0.75 gr S/100 scf. If the natural gas source is not from a utility pipeline, additional information (gas or emissions source testing results) must be submitted to verify sulfur content of less than 0.75 gr/100 scf.

Attachment IV:
Records of Bales Produced and Natural Gas Used

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:	**Eagle Valley Ginning LLC**
Gin Location:	**39936 W. North Avenue, Mendota, CA**

1. Are the emission reductions due to the installation of control equipment at an existing cotton gin? **n/a**

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

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-213-1-5**

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 surrendered?)

   MM/DD/YY: **12 /15 / 06**

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

Season	2002	2003	2004	2005	2006
Start MM/DD/YY	10/08/02	10/17/03	10/04/04	10/13/05	
End MM/DD/YY	12/11/02	01/12/04	01/11/05	12/19/05	
No. of Bales*	23558	31090	34254	22834	0

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

(Please continue on other side)

SACG-2 8/93

Proposal for Emission Reduction Credits (ERCs) for the Shutdown of Eagle Valley Ginning LLC located at 39936 W. North Avenue, Mendota, CA 93640

Historical Production Data (Bales Ginned and therms of Natural Gas Consumed) -

PRODUCTION DATA		
Year	**Bales Ginned**	**Therms Natural Gas Consumed**
2006	0	60
2005	22834	72403
2004	34254	90708
2003	31090	47799
2002	23558	38390

Baseline Period –

Two consecutive years = 2002 and 2003
[Note: This two year average most closely reflects the 10 year average bale production for this gin – see attached]

Bales = (23,558 + 31,090)/2
Bales = 27,324.0

Therms Natural Gas consumed = (38390 + 47799)/2
Therms Natural Gas consumed = 43,094.5

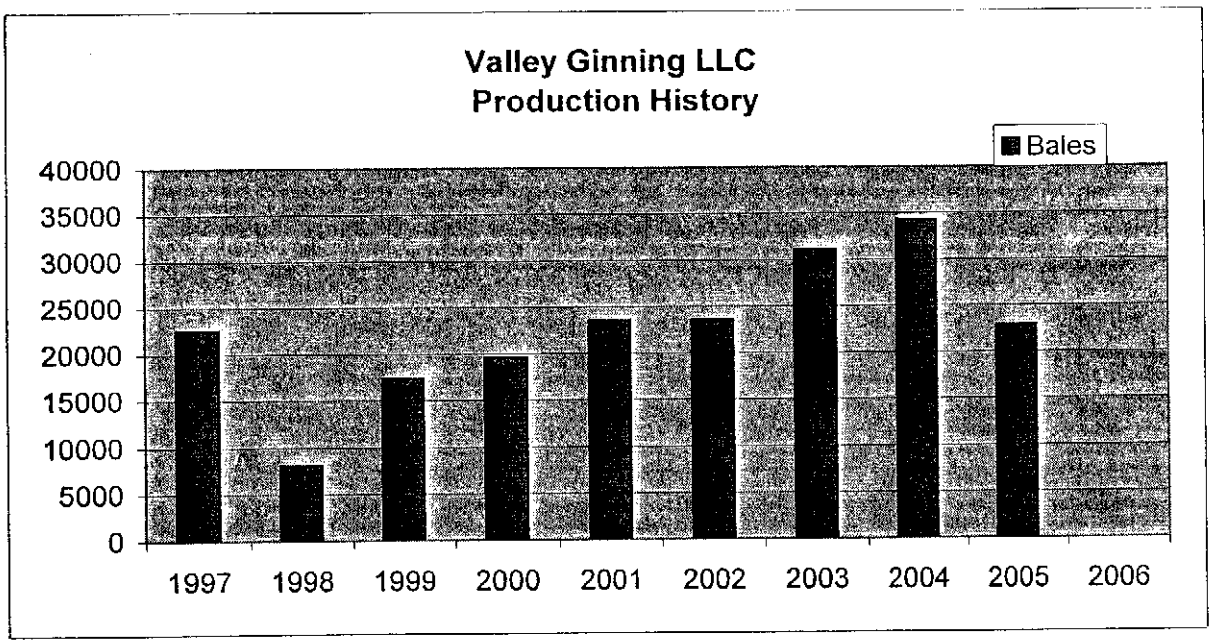
Historical Actual Emissions (HAE) -

Cotton Gin Emission Factor -

As listed in permit condition No. 8 (PTO#: C-213-1-5), emissions from this gin are equal to 1.67 lbs. PM10/bale. However, this reflects the use of "2D-2D" cyclones as control equipment. With the passage of Rule 4204 – Cotton Gins, the emission factor must be revised to reflect the use of "1D-3D" cyclones as the required control technology. Therefore, the revised emission factor, based upon the latest version of the California Cotton Ginners Association's Cotton Gin Emission Factor Handbook, is proposed to be 0.78 lbs. PM10 per bale.

Valley Ginning LLC

Year	Bales	2 yr. Averages	Comp. w/ 10 yr.	
1997	22519			
1998	8067			
1999	17363			
2000	19635			
2001	23520			
2002	23558			
2003	31090	27324.0	7040	Most Closely Matches 5 yr. average
2004	34254	32672.0	12388	
2005	22834	28544.0	8260	
2006	0	11417.0	8867	
Average =	20284.0			



Attachment V:
Cyclone System Airflows

POST EMISSIONS

Date: 3/30/2002

Client : Valley Ginning LLC

GIN RATE: 20 BPH

SYSTEM: 2D existing and 1D-3D on Condensers; Motes and Condenser collector robber system.	LB./PM10 BALE	C.F.M.	G/DSCF PM10	G/DSCF TSP
Unloading	0.11	12,800	0.020	0.040
#1 moist air	0.29	15,042	0.045	0.090
#2 moist air	0.23	15,042	0.036	0.071
Main trash	0.08	7,520	0.025	0.050
Over Flow	0.06	4,594	0.030	0.061
Motes A & B	0.07	20,000	0.008	0.016
Motes transfer	0.04	2,000	0.047	0.093
#1 & 2 Lint cleaner condenser	0.11	52,500	0.005	0.010
Battery Condenser	0.03	26,000	0.003	0.005
Condenser collector robber system	0.07	14,130	0.012	0.023
	1.09	169,628		

TSP = 2.18 LB. PM/BALE

TSP = 0.03 G/DSCF

12/18/2002

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

Rea: Valley Ginning LLC
39936 W. North Ave.
Mendota, CA 93640

ATC/PTO: C-213-1-1

Post Emission Factors.

This is the composition of emission factors that has been summarized in the ATC application dated 11-18-02 under emission factors - gin systems:

1.	Unloading. *(CCGA emission factor handbook)*		0.11
2.	#1 Dryer & Cleaner. *(CCGA emission factor handbook)*		0.11
3.	#2 Dryer & Cleaner. *(CCGA emission factor handbook)* & Mote cleaner trash *(CCGA emission factor handbook)*	*0.08* *0.02*	0.10
4.	Feeder dust, super jet trash (SIMILAR) *(CCGA emission factor handbook interpolating from lint trash robber system, motes cleaner trash)*	*0.05*	0.05
5.	Overflow. *(CCGA emission factor handbook)*		0.04

Valley Ginning continued:

6.	Main trash, stick Machine trash, Unloading collector bleed, *(CCGA emission factor handbook interpolating to stay under maximum allowable emissions)*	.09 *.04*	*0.13*
7.	Motes A & B. *(CCGA emission factor handbook interpolating to stay under maximum allowable emissions)*		0.07
8.	Mote transfer. *(CCGA emission factor handbook interpolating to stay under maximum allowable emissions)*		0.04
9.	Lint trash robber system (CCGA emission factor handbook)		0.07
10.	Lint cleaning. *(CCGA emission factor handbook)*		0.11
11.	Battery Condenser. (CCGA emission factor handbook)		0.03
		Total	0.86

Attachment VI:
Draft ERC Certificates
C-794-1, C-794-2, C-794-3, C-794-4, and C-794-5

San Joaquin Valley
Air Pollution Control District

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

Emission Reduction Credit Certificate
C-794-1

ISSUED TO: EAGLE VALLEY GINNING LLC

ISSUED DATE: <DRAFT>

LOCATION OF REDUCTION: 39936 W NORTH AVE
MENDOTA, CA 93640

For VOC Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	40 lbs

[ ] Conditions Attached

Method Of Reduction

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

SHUTDOWN OF A COTTON GIN

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.

Seyed Sadredin, Executive Director / APCO

DRAFT

David Warner, 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-794-2

ISSUED TO: EAGLE VALLEY GINNING LLC

ISSUED DATE: <DRAFT>

LOCATION OF REDUCTION: 39936 W NORTH AVE
MENDOTA, CA 93640

For NOx Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	734 lbs

[ ] Conditions Attached

Method Of Reduction

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

SHUTDOWN OF A COTTON GIN

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.

Seyed Sadredin, Executive Director / APCO

DRAFT

David Warner, Director of Permit Services

Mar 20 2007 9:54AM – PAMPAIAD

San Joaquin Valley
Air Pollution Control District

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

Emission Reduction Credit Certificate
C-794-3

ISSUED TO: EAGLE VALLEY GINNING LLC

ISSUED DATE: <DRAFT>

LOCATION OF REDUCTION: 39936 W NORTH AVE
MENDOTA, CA 93640

For CO Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	147 lbs

[ ] Conditions Attached

Method Of Reduction

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

SHUTDOWN OF A COTTON GIN

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.

Seyed Sadredin, Executive Director / APCO

DRAFT

David Warner, Director of Permit Services

Mar 20 2007 8:54AM – PAMPAIAD

San Joaquin Valley
Air Pollution Control District

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

Emission Reduction Credit Certificate
C-794-4

ISSUED TO: EAGLE VALLEY GINNING LLC

ISSUED DATE: <DRAFT>

LOCATION OF REDUCTION: 39936 W NORTH AVE
MENDOTA, CA 93640

For PM10 Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	18,935 lbs

[ ] Conditions Attached

Method Of Reduction

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

SHUTDOWN OF A COTTON GIN

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.

Seyed Sadredin, Executive Director / APCO

DRAFT

David Warner, Director of Permit Services

Mar 20 2007 9:54AM – PAMPAIAD

San Joaquin Valley
Air Pollution Control District

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

Emission Reduction Credit Certificate
C-794-5

ISSUED TO: EAGLE VALLEY GINNING LLC

ISSUED DATE: <DRAFT>

LOCATION OF REDUCTION: 39936 W NORTH AVE
MENDOTA, CA 93640

For SOx Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	5 lbs

[ ] Conditions Attached

Method Of Reduction

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

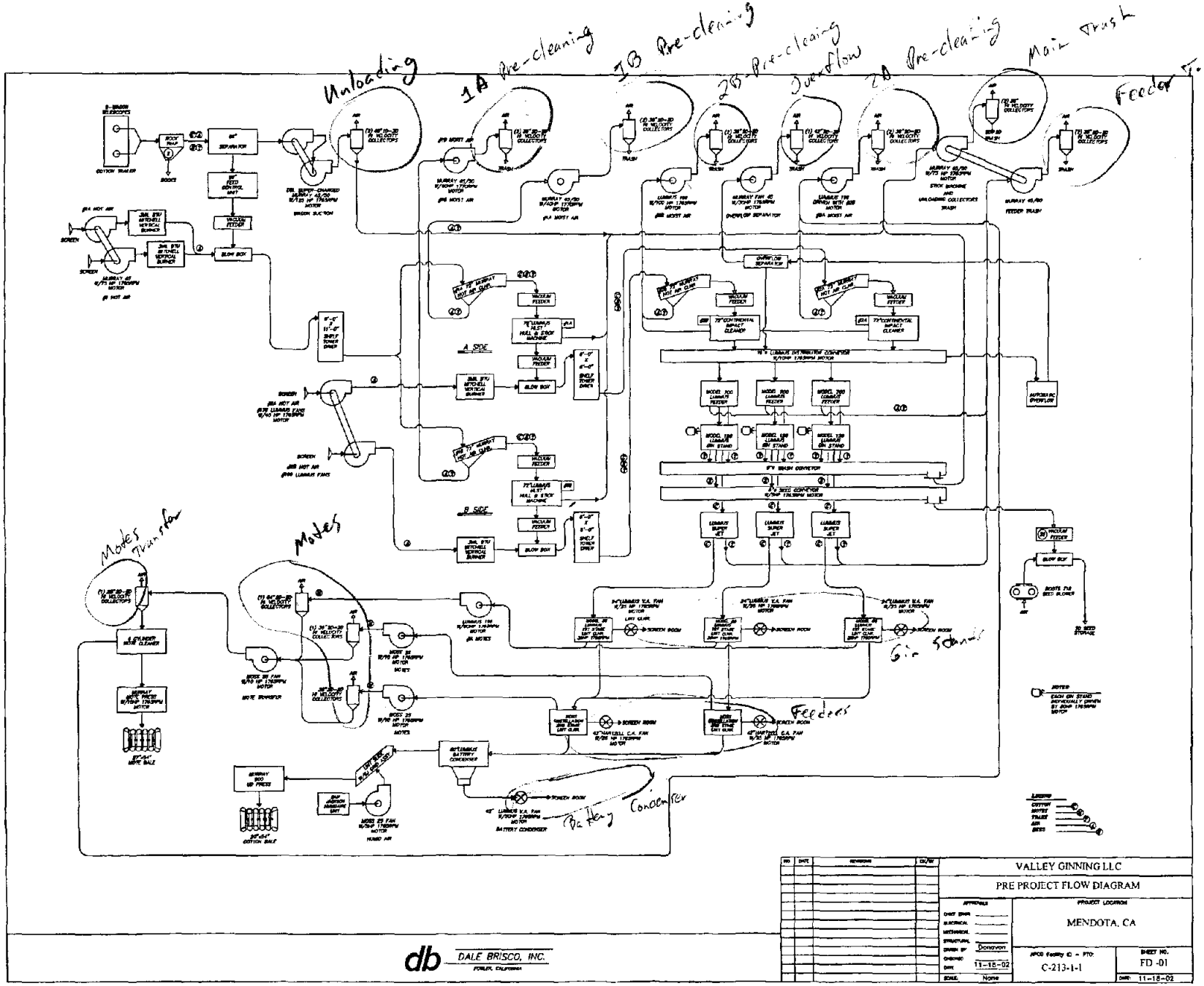
SHUTDOWN OF A COTTON GIN

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.

Seyed Sadredin, Executive Director / APCO

DRAFT

David Warner, Director of Permit Services


Unloading
1A Pre-cleaning
1B Pre-cleaning
2B Pre-cleaning
Overflow
2A Pre-cleaning
Main Trash
Feeder Trash
A SIDE
B SIDE
Motes Transfer
Motes
Feeders
Battery Condenser
VALLEY GINNING LLC
PRE PROJECT FLOW DIAGRAM
MENDOTA, CA
C-213-1-1
FD -01
11-18-02
DALE BRISCO, INC.

San Joaquin Valley Air Pollution Control District
ERC Application Preliminary Review
Cotton Gin

Facility Name:	Eagle Valley Ginning, LLC	Date:	January 4, 2007
Mailing Address:	27480 S. Bennett Rd. Firebaugh, CA 93622	Engineer:	Darrin Pampaian
		Lead Engineer:	Joven Refuerzo
Contact Person:	Bob Lange		
Telephone:	(209) 364-6162		
Project #:	C-1063777		
Submitted:	December 18, 2006		
Deemed Complete:	December 29, 2006		

I. Summary:

The primary business of this facility is a cotton ginning. Eagle Valley Ginning, LLC has surrendered their Permit to Operate C-0213-1-5 following the permanent shutdown of the operation as of December 14, 2006 and submitted an application to bank the emission reduction credits (ERCs) for the decreased emissions. A copy of the surrendered Permit to Operate (PTO) is included in Appendix A of this report.

II. Applicable Rules:

Rule 2201 New and Modified Stationary Source Review Rule (9/21/06)
Rule 2301 Emission Reduction Credit Banking (12/17/92)

III. Location of Reduction:

The physical location of the equipment involved with this application is 39936 W. North Ave. in Mendota, CA.

IV. Method of Generating Reductions:

The emissions reduction is generated by the shutdown of a permitted cotton ginning operation. At this facility the unloading system was controlled by 1D-3D cyclones, the 1A, 1B, 2A, and 2B pre-cleaning, the overflow, main trash, feeder trash, motes and motes transfer systems were controlled by 2D-2D cyclones, and the 1st and 2nd stage lint cleaning systems were controlled with a screen room. The gin was limited by permit condition to a ginning rate of 480 bales per day and 48,000 bales per year. The applicant surrendered their PTO on December 14, 2006 as part of this application.

V. Calculations:

A. Assumptions and Emission Factors

Assumptions:

- PM_{10} emissions assumed to equal 50% of PM emissions, per NSR Section 4.11.2.
- Annual emissions will be rounded to the nearest pound in accordance with the District Policy APR-1105 (dated 7/16/1992).
- The exhaust from the burners flows through the process air and exits at the cyclone collectors. In this case, PM_{10} amounts exhausted from the cyclones include emissions from both the burners and the ginning process. Therefore, the ginning PM_{10} emissions are not added to those calculated for the burners to determine the HAE.
- Bales are standardized to 500 lb/bale.
- Natural Gas Heating Value is 1,000 Btu/scf (District Policy APR-1720, dated 12/20/01).
- One therm of natural gas is equal to 0.100 MMBtu.
- F-Factor for Natural Gas is 8,578 dscf/MMBtu corrected to 60°F (40 CFR 60, Appendix B).
- Hourly throughput rate is 20 bales/hr, calculated as 480 bales/day (permit limit) ÷ 24 hrs/day)

Emission Factors:

The gin is permitted to fire their burners on both natural gas and LPG/propane, however the fuel records that were provided by the facility indicate that natural gas was the only fuel combusted for the last five years. Therefore, only emission factors for natural gas combustion will be used to determine facility's emissions.

The gin equipment included burners providing heated air to control the moisture content of the cotton. These burners were fired on natural gas and ERCs are requested from their shutdown. The PTO does not indicate natural gas combustion emission factors for SO_X and VOC, so AP-42 Emissions Factors and P G & E historical sulfur concentration tests shall be used.

The SO_X EF for natural gas combustion is 0.00285 lb-SO_X/MMBtu, as identified in District Policy APR 1720 - Generally Accepted SO_X Emission Factor for Combustion of PUC-quality Natural Gas (dated 12/20/01).

Per previous EPA comments and District Policy APR 1110 - Use of Revised Emission Factors (dated 4/28/04), the SO_X EF will be revised according to P G & E's historical records of sulfur concentration in their pipelines. Therefore the SO_X EF will be calculated using 0.25 gr-S/100 scf as follows:

SO_X EF (lb/MMBtu) = (0.25 gr-S/100 scf) x (1 scf/1,000 Btu) x (1 x10^6 Btu/MMBtu) x (1 lb/7,000 gr) x (2 SO_2/S)

SO_X EF = 0.00071 lb-SO_X/MMBtu

AP-42 (07/98) Table 1.4-2 lists the VOC emission factor for the combustion of natural gas as 0.0055 lb/MMBtu. This value will be used to determine VOC emissions from the burners.

Natural Gas Emission Factors		
Pollutant	EF (lb/MMBtu)	Source
VOC	0.0055	AP-42 (07/98) Table 1.4-2
NO_X	0.1	Current Permit
CO	0.02	Current Permit
SO_X	0.00071	P G & E Gas Line Source Tests

The PTO specifies an EF of 1.67 lb-PM_{10}/bale (see Appendix A, permit condition 8). The following table compares emissions factors from the California Cotton Ginners Association (CCGA) emission factor handbook, the current permitted emissions factors, emissions factors from the existing engineering evaluation, and source tested emissions factors. All of the sources of emissions factors are compared in the following table to determine the amount of ERCs available for banking.

Comparison of CCGA Emission Factors Handbook Summary, Permitted Emissions Factors, Engineering Evaluation Emissions Factors, and Source Testing Emissions Factors							
Gin Type: SAW							
System	Cyclone Design	CCGA Handbook EFs, version 1.5 ($lb\text{-}PM_{10}$/bale)		PTO EFs ($lb\text{-}PM_{10}$/bale)	Engineering Evaluation EFs ($lb\text{-}PM_{10}$/bale)	Source Testing EFs ($lb\text{-}PM_{10}$/bale)	Proposed EFs ($lb\text{-}PM_{10}$/bale)
		Current EFs					
		Average	Average + S. D.				
Unloading (Wagon and Module Feeder)	1D-3D	0.11	0.15	--	**0.11**	--	0.11
#1 Precleaning (1A and 2A)	2D-2D	0.29	0.54	--	**0.29**	--	0.29
#2 Precleaning (1B and 2B)	2D-2D	0.21	0.41	--	**0.23**	--	0.23
Overflow	2D-2D	N/A[1]		--	**0.06**	--	0.06
Main Trash (Stick Machines and Unloading Collectors Trash)	2D-2D	N/A[2]		--	**0.08**	--	0.08
Feeders, Gin Stands, and Battery Condenser	Screen Basket	N/A[3]		--	**0**	--	0
#1 Stage Lint Cleaning	Screen Basket	0.48	0.48	--	**0.23**		0.23
#2 Stage Lint Cleaning	Screen Basket	0.30	0.30	--	**0.23**		0.23
Battery Condenser	Screen Basket	0.17	**0.17**	--	0.17		0.17
Feeder Trash (Gin Stand Feeder Trash)	2D-2D	0.04	**0.04**	--	0	--	0.04
Motes System	2D-2D	0.25	0.40	--	**0.23**	--	0.23
Motes Transfer System	2D-2D	N/A[4]		--	**0.04**	--	0.04
			Totals	**1.67**	1.67	N/A[5]	1.71

As shown above, the total emissions factor for this cotton gin is 1.71 $lb\text{-}PM_{10}$/bale. This is greater than the total emissions factor of 1.67 $lb\text{-}PM_{10}$/bale specified on the current PTO. Therefore, the more conservative figure of 1.67 $lb\text{-}PM_{10}$/bale will be used to determine the amount of ERCs available for banking.

[1]There is not a specific CCGA EF that applies to overflow systems on saw type gins with 2D-2D cyclones.
[2]There is not a specific CCGA EF that applies to main trash systems on saw type gins with 2D-2D cyclones.
[3]There is not a specific CCGA EF that applies to 1st and 2nd stage lint cleaning and battery condenser systems on saw type gins with screen baskets.
[4]There is not a specific CCGA EF that applies to motes transfer systems on saw type gins with 2D-2D cyclones.
[5]There has been no source testing of any of the equipment at this facility.

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" (District Rule 2201, Section 3.8).

According to District Policy APR-1810 (dated 9/9/92), the date of shutdown for permitted sources shall be the date of surrender of the operating permits, unless otherwise determined as stated in the policy. The applicant has provided the historical ginning records for the 2002, 2003, 2004, 2005, and 2006 ginning seasons (see Appendix B).

Historical Throughput and Fuel Use for the Cotton Gin			
Season Start Date	Season End Date	Bales Produced (500 lb bales)	Natural Gas Usage (therms)
		4^{th} and 1^{st} Quarter Season	4^{th} and 1^{st} Quarter Season
October 8, 2002	December 11, 2002	23,558	72,403
October 17, 2003	January 12, 2004	31,090	90,708
October 4, 2004	January 11, 2005	34,254	47,779
October 13, 2005	December 19, 2005	22,834	38,390
October 13, 2006	N/A	0	60
	5 Year Average:	**22,347**	**49,868**

During the five years of operation prior to the ERC application the facility operated in the first quarter in only the 2003 and 2004 seasons. The facility has only provided data for bales produced and natural gas usage on a seasonal basis but cotton gins typically operate 24 hours per day, seven days a week until all on the cotton from the previous growing season is ginned. As required by District Rule 2201, "normal" source operation for the eight consecutive calendar quarter periods that most closely represents the five year average must be determined. Therefore, the prorated amount of bales produced and natural gas usage based on days of operation during the ginning season will be calculated for the 2003 and 2004 seasons only.

Prorating Bale Production and Natural Gas Usage for the 4^{th} and 1^{st} Quarters for the 2003 Season:

There were a total of 88 days of operation for the 2003 season (15 days in October + 30 days in November + 31 days in December + 12 days in January). Of this total, 76 days of operation occurred in the 4^{th} quarter (88 total days – 12 days in January) and 12 days of operation occurred in the 1^{st} quarter. Therefore, the calculated bales produced and natural gas usage for 4^{th} and 1^{st} quarters for the 2003 season is calculated as follows:

Bale Production:

4th Qtr, Bale Production (bales/qtr) = 31,090 bales in the 2003 season x (76 4th quarter days ÷ 88 total days)

4th Qtr, Bale Production = 26,850 bales/qtr

1st Qtr, Bale Production (bales/qtr) = 31,090 bales in the 2003 season x (12 4th quarter days ÷ 88 total days)

1st Qtr, Bale Production = 4,240 bales/qtr

Fuel Usage:

4th Qtr, Fuel Usage (therms/qtr) = 90,708 therms in the 2003 season x (76 4th quarter days ÷ 88 total days)

4th Qtr, Fuel Usage = 78,339 therms/qtr

1st Qtr, Fuel usage (therms/qtr) = 90,708 therms in the 2003 season x (12 4th quarter days ÷ 88 total days)

1st Qtr, Fuel Usage = 12,369 therms/qtr

Prorating Bale Production and Natural Gas Usage for the 4th and 1st Quarters for the 2004 Season:

There were a total of 100 days of operation for the 2004 season (28 days in October + 30 days in November + 31 days in December + 11 days in January). Of this total, 89 days of operation occurred in the 4th quarter (100 total days – 11 days in January) and 11 days of operation occurred in the 1st quarter. Therefore, the calculated bales produced and natural gas usage for 4th and 1st quarters for the 2004 season is calculated as follows:

Bale Production:

4th Qtr, Bale Production (bales/qtr) = 34,254 bales in the 2004 season x (89 4th quarter days ÷ 100 total days)

4th Qtr, Bale Production = 30,486 bales/qtr

1st Qtr, Bale Production (bales/qtr) = 34,254 bales in the 2004 season x (11 4th quarter days ÷ 100 total days)

1st Qtr, Bale Production = 3,768 bales/qtr

Fuel Usage:

4th Qtr, Fuel Usage (therms/qtr) = 47,779 therms in the 2004 season x (89 4th quarter days ÷ 100 total days)

4th Qtr, Fuel Usage = 42,523 therms/qtr

1st Qtr, Fuel usage (therms/qtr) = 47,779 therms in the 2004 season x (11 4th quarter days ÷ 100 total days)

1st Qtr, Fuel Usage = 5,256 therms/qtr

Baseline Determination for the Cotton Gin		
Calendar Quarter	Cotton Bale Production (500 lb bales)	Eight Quarter Difference for Cotton Bale Production (500 lb bales)
1st 2002	0	N/A
2nd 2002	0	N/A
3rd 2002	0	N/A
4th 2002	23,558	N/A
1st 2003	0	N/A
2nd 2003	0	N/A
3rd 2003	0	N/A
4th 2003	26,850	**714**
1st 2004	4,240	1,244
2nd 2004	0	1,244
3rd 2004	0	1,244
4th 2004	30,486	2,110
1st 2005	3,768	2,581
2nd 2005	0	2,581
3rd 2005	0	2,581
4th 2005	22,834	2,079
1st 2006	0	1,549
2nd 2006	0	1,549
3rd 2006	0	1,549
4th 2006	0	2,262
Average:	**5,587**	

The values in the columns labeled "Eight Quarter Difference" represent the absolute value of the difference between the facility's quarterly cotton bale production averaged over the last 5 years since the date the application was submitted and the quarterly throughput averaged over the previous eight consecutive calendar quarters starting with Q4 1998. The smallest "difference" is assumed to be the eight consecutive calendar quarter periods that most closely represents "normal" source operation. For this ERC

application the most recent representative eight consecutive calendar quarters for cotton bale production are from the 1st quarter of 2002 to the 4th quarter of 2003. These are the most recent eight consecutive calendar quarters out of the past five years that the cotton gin was operating and most closely represent the last five years of operation of the cotton gin. Based on the ginning records provided, the average bale throughput and the average natural gas usage from the representative two years (2002 and 2003) for the ERC application are calculated as follows:

Average Bale Throughput (bales/yr) = [2002 (bales/yr) + 2003 (bales/yr)] ÷ 2
Average Bale Throughput bales/yr = (23,558 bales/yr + 31,090 bales/yr) ÷ 2
Average Bale Throughput = 27,324 bales/yr

Average Natural Gas Usage (therms/yr) = [2002 (therms/yr) + 2003 (therms/yr)] ÷ 2
Average Natural Gas Usage therms/yr = (72,403 therms/yr + 90,708 therms/yr) ÷ 2
Average Natural Gas Usage = 81,556 therms/yr

With one therm of natural gas is equal to 100,000 Btu:

Average Natural Gas Usage Btu/yr = 81,556 therms/yr x 0.100 MMBtu/therm
Average Natural Gas Usage = 8,156 MMBtu/yr

The baling production for 2002 and 2003 was based upon annual records. The same 2002 and 2003 baseline period was used for historic natural gas fuel usage. The facility has not been operated since the 2005 season; therefore the total bale throughput and propane usage for the 2006 season is equal to zero and will not be used to calculate the baseline emissions.

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 3.21.

PM_{10}:

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.

4th Qtr, HAE for PM_{10} lb/qtr = 1.23 lb-PM_{10}/bale x 27,324 bales/qtr
4th Qtr, HAE for PM_{10} = 33,609 lb-PM_{10}/qtr

Adding the HAE from the dryers and ginning operation produces the HAE totals. Because the exhaust from the burners flows through the process air and exits at the cyclone collectors, PM_{10} amounts exhausted from the cyclones include emissions from the dryers and the ginning process. Therefore, the PM_{10} emissions from the dryers are not added to those calculated for the ginning operation to determine the HAE.

VOC, NO_X, CO, and SO_X:

The HAE for is calculated using emission factors for natural gas combustion from EPA's AP-42, the current PTO, and District Policy 1720 and the average natural gas use during the baseline period. The cotton gin was only operated during the fourth and first quarter of each year.

Historical Average Natural Gas Usage (MMBtu/yr) = 8,156 MMBtu/yr

HAE_{NG} (lb/qtr) = EF_{NG} (lb/MMBtu) x Historical Natural Gas Usage (MMBtu/yr) x (Days of Operation/qtr ÷ Total Days of Operation)

4^{th} Qtr, HAE for VOC_{NG} (lb/qtr) = (0.0055 lb-VOC/MMBtu) x 8,156 MMBtu/yr
4^{th} Qtr, HAE for VOC_{NG} = 45 lb-VOC/qtr

4^{th} Qtr, HAE for $NO_{X\,NG}$ lb/qtr = (0.1 lb-NO_X/MMBtu) x 8,156 MMBtu/yr
4^{th} Qtr, HAE for $NO_{X\,NG}$ = 816 lb-NO_X/qtr

4^{th} Qtr, HAE for CO_{NG} lb/qtr = (0.02 lb-CO/MMBtu) x 8,156 MMBtu/yr
4^{th} Qtr, HAE for CO_{NG} = 163 lb-CO/qtr

4^{th} Qtr, HAE for $SO_{X\,NG}$ lb/qtr = (0.00071 lb-SO_X/MMBtu) x 8,156 MMBtu/yr
4^{th} Qtr, HAE for $SO_{X\,NG}$ = 6 lb-SO_X/qtr

HAE for Natural Gas Combustion	
Pollutant	4^{th} Qtr. HAE_{NG} (lb/qtr)
VOC	45
NO_X	816
CO	163
SO_X	6

D. Adjustments to HAE

Pursuant to Section 3.22 of Rule 2201, Historical Actual Emissions must be discounted for any emissions reduction which is:

- required or encumbered by any laws, rules, regulations, agreements, orders, or
- attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan, or
- proposed in the District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act.

Emissions Adjusted for Emission Factor Determination:

Rule 4204 Cotton Gins was adopted on February 17, 2005 and requires cotton gins to use 1D-3D cyclones with emissions equivalent to the emission factors from the latest revision of the CCGA handbook. The emission factors from the current valid permit will be adjusted in accordance with District Rule 2201 in the Section titled *Emissions Adjusted for Rule 4204 – Cotton Gins* of this evaluation.

Emissions Adjusted for Rule 4201 - Particulate Matter Concentration:

According to Section 3.1 particulate matter (PM) emissions from each source operation should not exceed 0.1 grains per cubic foot of gas at dry standard conditions. The calculation is based on a 20 bales/hr ginning rate and the airflow through the control device. The airflow for each system is taken from District project C-1021007 (see Appendix C). Emission Factors are taken from the ones presented in Section VII.B. The following equation is used to determine the grain loading for each system and the results are listed in following table.

Baling Rate = 480 bales/day = 20.0 bales/hr

$$PM_{10}\ (gr/dscf) = \frac{(lb\text{-}PM_{10}/bale) \times (7000\ gr/lb\text{-}PM_{10}) \times (2\ lb\text{-}PM/lb\text{-}PM_{10}) \times (20\ bales/hr)}{(scf/min) \times (60\ min/hr)}$$

PM Concentrations				
System	Control	**EFs** ($lb\text{-}PM_{10}$/bale)	**Air Flow** (cfm)	**Grain Loading** (grain/dscf)
Unloading	1D-3D	0.11	12,800	0.04
#1 Precleaning	1D-3D	0.11	15,042	0.03
#2 Precleaning	1D-3D	0.09	15,042	0.03
Overflow	1D-3D	0.04	4,594	0.04
Main Trash	1D-3D	0	7,521	0.0
Feeders, Gin Stands, and Battery Condenser	1D-3D	0	14,103	0.0
#1 Lint Cleaning	1D-3D	0.10	16,666	0.03
#2 Lint Cleaning	1D-3D	0.03	10,000	0.01
Battery Condenser	1D-3D	0.03	26,000	0.01
Feeder Trash	1D-3D	0.08	7,521	0.05
Motes System	1D-3D	0.07	13,349	0.02
Motes Transfer System	1D-3D	0.03	2,042	0.07

Since no concentration is above 0.1grain/dscf, no adjustment is needed.

Emissions Adjusted for Rule 4202 Particulate Matter - Emission Rate:

District Rule 4202 Particulate Matter – Emission Rate (12/17/92), 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 lbs of seed cotton per bale of finished cotton and drops to about 500 lbs of lint cotton per bale of finished cotton.

Below, emissions are checked at unloading, lint cleaning, and the battery condenser. Any adjustments will be subtracted from the EF based on the CCGA tables. In this case, since the permitted EF is higher than the CCGA EF, the new adjusted CCGA EF will be compared to the permit limit, and the lower number will be used.

Baling Rate = 480 bales/day = 20.0 bales/hr

1. Unloading:

For Process Rate (P) = 20.0 bales/hr x 1,500 lb/bale
= 30,000 lb/hr of seed cotton
= 15.0 tons/hr of seed cotton

The emissions limit (E), per District Rule 4202, is calculated as follows:

$E = 3.59 \times P^{0.62}$
$= 3.59 \times (15.0)^{0.62}$
= 19.2 lb-PM/hr

The emissions factor for unloading is 0.11 lb-PM_{10}/bale (1D-3D cyclone), per CCGA Emission Factors Summary Tables. Based on this emissions factor, the emission rate for unloading is 2.20 lb-PM_{10}/hr (20.0 bales/hr x 0.11 lb-PM_{10}/bale). Assuming 50% of PM is PM_{10}, this is equivalent to a PM emission rate of 4.4 lb-PM/hr. Therefore, the PM emissions are within the allowable limits of this Rule.

2. Lint Cleaner:

The District has contacted the CCGA and requested the information of the process weights for lint cleaning. The CCGA has stated that they do not know the processing weights at the specified points. The process weights for these emission points will therefore be 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.

Emissions Factors:

Lint Cleaning: 0.10 lb-PM_{10}/bale + 0.03 lb-PM_{10}/bale = 0.13 lb-PM_{10}/bale
Battery Condenser: 0.03 lb-PM_{10}/bale

Assuming a 90% control efficiency for the cyclones and 50% of PM emissions are PM_{10}, we can determine the weight of material removed by the battery condenser and the lint cleaner:

Lint Cleaning:

Let X = lb-PM/bale (pre-lint cleaning) and assuming 90% control efficiency of the cyclone

Mass Balance: X x (1 - 0.90) = 0.13 lb PM/bale
= 0.13 lb PM/bale ÷ 0.10
X = 1.3 lb PM/bale

Battery Condenser:

Let X = lb-PM/bale (pre-battery condenser) and assuming 90% control efficiency of the cyclone

Mass Balance: X x (1 - 0.90) = 0.03 lb PM/bale
= 0.03 lb PM/bale ÷ 0.10
X = 0.3 lb PM/bale

Therefore, the process weight of the bale when it entered the lint cleaner was ≈ 501.6 lbs (500 + 1.3 + 0.3) and approximately 1.3 lbs of material was removed by the lint cleaner. The battery condenser process weight is ≈ 500.3 lbs since approximately 1.3 lbs of material is removed by lint cleaner.

Lint Cleaner:

For Process Rate (P) = 20.0 bales/hr x 501.6 lb/bale
= 10,032 lb/hr of seed cotton
= 5.02 tons/hr

The emissions limit (E), per District Rule 4202, is calculated as follows:

$E = 3.59 \times P^{0.62}$
$= 3.59 \times (5.02)^{0.62}$
= 9.8 lb-PM/hr

The emissions factor for the Lint Cleaner is 0.13 lb PM_{10}/bale (1D-3D), based on source test information from similar gins, as compiled in the CCGA Factors summary tables. Based on this emissions factor, the emission rate for this lint cleaner is 2.6 lb-PM_{10}/hr (20.0 bales/hr x 0.13 lb-PM_{10}/bale). Assuming 50% of PM is PM_{10}, this is equivalent to a PM emission rate of 5.2 lb-PM/hr. Therefore, the PM emissions are not above the allowable Rule limits, and adjustment is not necessary for the lint cleaner.

3. Battery Condenser:

For Process Rate (P) = 20.0 bales/hr x 500.3 lb/bale
= 10,006 lb/hr of seed cotton
= 5.00 tons/hr

The emissions limit (E), per District Rule 4202, equals
$E = 3.59 \times P^{0.62}$
$= 3.59 \times (5.00)^{0.62}$
= 9.7 lb-PM/hour

The emissions factor for the battery condenser is 0.03 lb PM_{10}/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 the battery condenser is 0.60 lb-PM_{10}/hr (20.0 bales/hr x 0.03 lb-PM_{10}/bale). Assuming 50% of PM is PM_{10}, this is equivalent to a PM emission rate of 1.2 lb-PM/hr. Therefore, the PM emissions are not above the allowable Rule limits, and adjustment is not necessary for the battery condenser.

Emissions Adjusted for Rule 4204 - Cotton Gins:

Rule 4204 Cotton Gins was adopted on February 17, 2005 and requires cotton gins to use 1D-3D cyclones, with emissions equivalent to the emission factors from the latest revision of the CCGA handbook, by July 1, 2008. Pursuant to Section 3.22 of Rule 2201, Historical Actual Emissions must be discounted for any emissions reduction which is: required or encumbered by any laws, rules, regulations, agreements, orders, or , proposed in the District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act. Therefore, even though the cotton gin was in compliance with this Rule at the time of the ERC application submittal, the amount of ERCs that will be allowed to be banked will be discounted for the future required compliance with this Rule.

Since at this facility the unloading system was controlled by 1D-3D cyclones, the 1A, 1B, 2A, and 2B pre-cleaning, the overflow, main trash, feeder trash, motes and motes transfer systems were controlled by 2D-2D cyclones, and the 1st and 2nd stage lint cleaning systems were controlled with a screen room, adjustments to the PM_{10} emission factors are necessary. The emission factors were compared to the current CCGA handbook emissions and source tested values as if the control devices were retrofitted to the gin. The most conservative emission factors were used and are listed in the following table:

Emission Factors Adjusted for Applicant/CCGA EFs					
Gin Type: SAW					
System	Current Cyclone Design	Required Cyclone Design	EFs from Current PTO and/or Engineering Evaluation (lb-PM_{10}/bale)	CCGA Average EFs Required by Rule 4204 (lb-PM_{10}/bale)	Adjusted EFs (lb-PM_{10}/bale)
Unloading (Wagon and Module Feeder)	1D-3D	1D-3D	0.11	**0.11**	0.11
#1 Precleaning (1A and 2A)	2D-2D	1D-3D	0.29	**0.11**	0.11
#2 Precleaning (1B and 2B)	2D-2D	1D-3D	0.23	**0.09**	0.09
Overflow	2D-2D	1D-3D	0.06	**0.04**	0.04
Main Trash (Stick Machines and Unloading Collectors Trash)	2D-2D	1D-3D	**0.08**	N/A[6]	0.08
Feeders, Gin Stands, and Battery Condenser	Screen Basket	1D-3D	**0**	0	0
#1 Stage Lint Cleaning	Screen Basket	1D-3D	0.23	**0.10**	0.10
#2 Stage Lint Cleaning	Screen Basket	1D-3D	0.23	**0.03**	0.03
Battery Condenser	Screen Basket	1D-3D	0.17	**0.03**	0.03
Feeder Trash (Gin Stand Feeder Trash)	2D-2D	1D-3D	0	**0.08**	0.08
Motes System	2D-2D	1D-3D	0.23	**0.07**	0.07
Motes Transfer System (Motes Cleaner Trash)	2D-2D	1D-3D	0.04	**0.03**	0.03
		Totals	1.67	0.69	**0.77**

The total emission factor for this cotton gin of 1.67 lb-PM_{10}/bale is greater than the adjusted emission factor of 0.77 lb-PM_{10}/bale. Therefore, the more conservative figure of 0.77 lb-PM_{10}/bale will be used to determine the amount of ERCs available for banking. Therefore, the emissions factor has been adjusted from 1.67 lb-PM_{10}/bale to 0.77 lb-PM_{10}/bale.

[6]There is not a specific CCGA EF that applies to main trash systems on saw type gins with 2D-2D cyclones.

Total Adjustment

The total adjustment is equal to the sum of the adjusted parts. In this case, the unloading equipment is controlled by 1D-3D cyclones and the rest of the equipment is controlled by 2D-2D cyclones. Therefore, an adjustment is necessary.

The PM_{10} calculation for the gin is now:

4th Qtr, HAE for PM_{10} (lb/qtr) = 0.77 lb-PM_{10}/bale x 27,324 bales/qtr
= 21,039 lb-PM_{10}/qtr

Emissions Adjusted for Rule 4309 - Dryers, Dehydrators, and Ovens:

District Rule 4309 Dryers, Dehydrators, and Ovens (12/15/05), Section 4.1.6 specifically exempts units used to dry lint cotton or cotton at cotton gins. The dryers at this facility are used to dry cotton therefore no adjustment is necessary.

Emissions Adjusted for Rule 4801 - Sulfur Compounds:

District Rule 4801 requires that a person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume calculated as SO_2, on a dry basis averaged over 15 consecutive minutes.

Using the ideal gas equation and the emission factors presented in Section V.A, the sulfur compound emissions are calculated as follows:

SO_X EF = 0.00071 lb-SO_X/MMBtu

Volume $SO_2 = \frac{n \times R \times T}{P}$

With:

N = moles SO_2
T (Standard Temperature) = 60 °F = 520 °R
P (Standard Pressure) = 14.7 psi
R (Universal Gas Constant) = $\frac{10.73 psi \cdot ft^3}{lb \cdot mol \cdot °R}$

EPA F-Factor for Natural Gas: 8,710 dscf/MMBtu at 68 °F, equivalent to:

$$Corrected\ F-factor = \left(\frac{8{,}710 dscf}{MMBtu}\right) \times \left(\frac{60°F + 459.6}{68°F + 459.6}\right) = 8{,}578 \frac{dscf}{MMBtu}\ at\ 60°F$$

$$\frac{0.00071 \cdot lb - SOx}{MMBtu} \times \frac{MMBtu}{8{,}578\,dscf} \times \frac{1lb \cdot mol}{64\,lb} \times \frac{10.73\,psi \cdot ft^3}{lb \cdot mol \cdot °R} \times \frac{520°R}{14.7\,psi} \times \frac{1{,}000{,}000 \cdot parts}{million} = 0.49 \frac{parts}{million}$$

$$SulfurConcentration = 0.49 \frac{parts}{million} < 2{,}000 \text{ ppmv (or 0.2\%)},$$

Since the sulfur concentration of the natural gas fuel is less than 2,000 ppmv, no adjustment is needed.

Total Adjusted Historical Actual Emissions (HAE):

The total adjustment is equal to the sum of the adjusted parts. There were no adjustments made to the Historical Actual Emissions for NO_X, SO_X, CO, or VOC; however adjustments were made to the HAE for PM_{10}.

For PM_{10} emissions, the unloading equipment is controlled by 1D-3D cyclones and the rest of the equipment is controlled by 2D-2D cyclones, therefore emission factors were updated to be consistent with the 1D-3D cyclone requirements of Rule 4204, the most recent revision of the CCGA handbook, applicant proposed emissions factors, and source tested emission factors. The adjusted HAE for all criteria pollutants are calculated and presented in the following table.

Historical Average Natural Gas Usage (MMBtu/yr) = 8,156 MMBtu/yr

$HAE_{NOx,\ SOx,\ CO,\ and\ VOC}$ (lb/qtr) = EF_{NG} (lb/MMBtu) x Historical Natural Gas Usage (MMBtu/yr)

HAE_{PM10} (lb/qtr) = Adjusted EF lb-PM_{10}/bale x Average bales/qtr

4th Qtr, HAE for VOC_{NG} (lb/qtr) = (0.0055 lb-VOC/MMBtu) x 8,156 MMBtu/yr
4th Qtr, HAE for VOC_{NG} = 45 lb-VOC/qtr

4th Qtr, HAE for $NO_{X\ NG}$ lb/qtr = (0.1 lb-NO_X/MMBtu) x 8,156 MMBtu/yr
4th Qtr, HAE for $NO_{X\ NG}$ = 816 lb-NO_X/qtr

4th Qtr, HAE for CO_{NG} lb/qtr = (0.02 lb-CO/MMBtu) x 8,156 MMBtu/yr
4th Qtr, HAE for CO_{NG} = 163 lb-CO/qtr

4th Qtr, HAE for PM_{10} (lb/qtr) = 0.77 lb-PM_{10}/bale x 27,324 bales/qtr
4th Qtr, HAE for PM_{10} (lb/qtr) = 21,039 lb-PM_{10}/qtr

4th Qtr, HAE for $SO_{X\ NG}$ lb/qtr = (0.00071 lb-SO_X/MMBtu) x 8,156 MMBtu/yr
4th Qtr, HAE for $SO_{X\ NG}$ = 6 lb-SO_X/qtr

Total Adjusted Historical Actual Emissions (HAE)				
Pollutant	1st Qtr. HAE (lb/qtr)	2nd Qtr. HAE (lb/qtr)	3rd Qtr. HAE (lb/qtr)	4th Qtr. HAE (lb/qtr)
VOC	0	0	0	45
NO_X	0	0	0	816
CO	0	0	0	163
PM_{10}	0	0	0	21,039
SO_X	0	0	0	6

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 – PE2.

AER = HAE – PE2

4th Quarter Actual Emissions Reductions:

AER_{VOC} (lb/yr) = 45 lb-VOC/qtr – 0 lb-VOC/qtr = 45 lb-VOC/qtr
AER_{NOx} (lb/yr) = 816 lb-NO_X/qtr – 0 lb-NO_X/qtr = 816 lb-NO_X/qtr
AER_{CO} (lb/yr) = 163 lb-CO/qtr – 0 lb-CO/qtr = 163 lb-CO/qtr
AER_{PM10} (lb/yr) = 21,039 lb-PM_{10}/qtr – 0 lb-PM_{10}/qtr = 21,039 lb-PM_{10}/qtr
AER_{SOx} (lb/yr) = 6 lb-SO_X/qtr – 0 lb-SO_X/qtr = 6 lb-SO_X/qtr

Actual Emission Reductions (AER)				
Pollutant	1st Qtr. AER (lb/qtr)	2nd Qtr. AER (lb/qtr)	3rd Qtr. AER (lb/qtr)	4th Qtr. AER (lb/qtr)
VOC	0	0	0	45
NO_x	0	0	0	816
CO	0	0	0	163
PM_{10}	0	0	0	21,039
SO_x	0	0	0	6

F. Air Quality Improvement Deduction

The Air Quality Improvement Deduction (AQID) is 10% of the AER per Rule 2201, Sections 3.5 and 4.12.1, and is summarized as follows:

Air Quality Improvement Deduction (AQID)				
Pollutant	1st Qtr. AQID (lb/qtr)	2nd Qtr. AQID (lb/qtr)	3rd Qtr. AQID (lb/qtr)	4th Qtr. AQID (lb/qtr)
VOC	0	0	0	5
NO_x	0	0	0	82
CO	0	0	0	16
PM_{10}	0	0	0	2,104
SO_x	0	0	0	1

G. Increases in Permitted Emissions (IPE)

No IPE is associated with this project.

H. Bankable Emissions Reductions Credits

The bankable emissions reductions credits, presented in following table, 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 and first quarters (see throughput records in Section V.B).

Bankable Emissions Reductions Credits (ERCs)				
Pollutant	1st Qtr ERCs (lb/qtr)	2nd Qtr ERCs (lb/qtr)	3rd Qtr ERCs (lb/qtr)	4th Qtr ERCs (lb/qtr)
VOC	**0**	**0**	**0**	**40**
NO_x	**0**	**0**	**0**	**734**
CO	**0**	**0**	**0**	**147**
PM_{10}	**0**	**0**	**0**	**18,935**
SO_x	**0**	**0**	**0**	**5**

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 cotton ginning equipment. The emissions reductions were calculated from actual historic production data and recognized emission factors. The emission factor of 0.77 lb-PM_{10}/bale is based on the District Rule 4204 Cotton Gins (2/17/05) requirement of 1D-3D cyclones on all systems. Therefore, the allowed reductions are real.

B. Enforceable

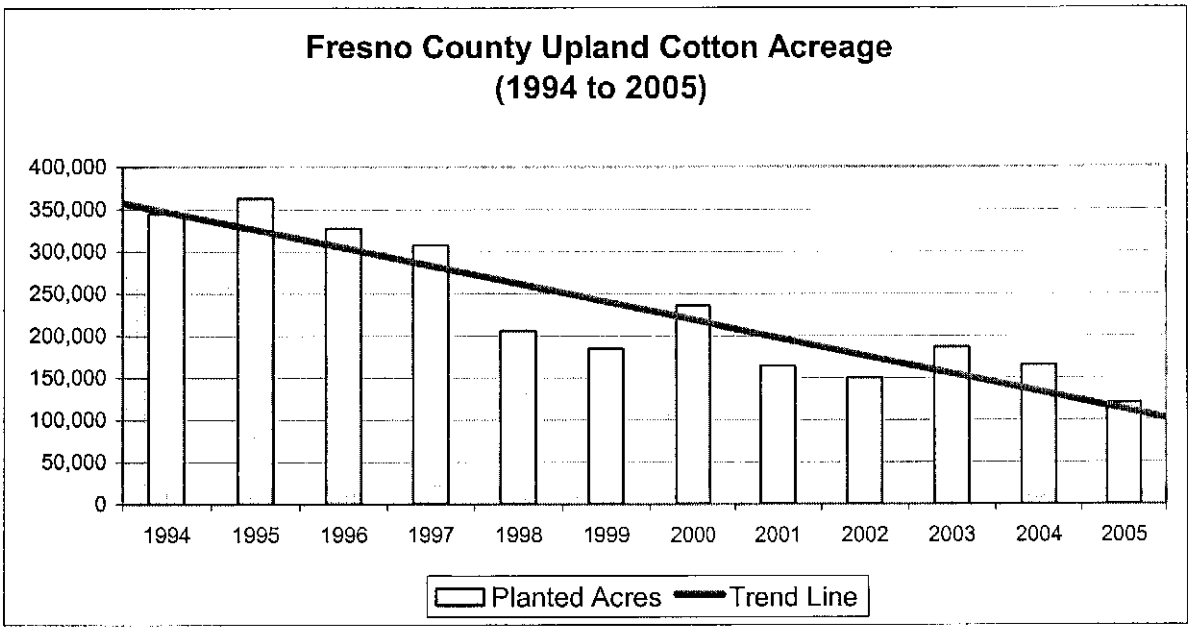
The PTO for this facility has been surrendered and the cotton gins cannot be operated without a valid PTO. Therefore, the reductions are enforceable.

C. Quantifiable

Reduction amounts were calculated from historic process throughput data, source test results from similar operations, CCGA 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. Much of the acreage that provided the gin with cotton in the past has been retired (several hundred thousand acres are being taken out of production in Western Fresno County due to water concerns) or replaced with almonds or pistachios. In addition, the increase in the number of dairies constructed in the valley has resulted in an increase in the planting of forage crops for dairies on land that was historically used to grow cotton. This has resulted in a reduction in cotton acreage. In addition, research by the District has shown that there has been a steady decrease in the planted acreage of upland cotton since 1994. Information for the following table was provided by Cantua Creek Cooperative Gin, Inc. for project C-1061965 (see Appendix C).



As documented in the previous table and discussed in this Section, the overall trend of upland cotton acreage planted has declined over the past 12 years and is expected to continue to decline in the future. Therefore, it can be determined that the cotton that was being processed at the Eagle Valley Ginning, LLC gin is no longer being grown and the emissions reductions in this project are permanent.

E. Surplus

To be considered surplus, Actual Emission Reductions shall be in excess, at the time the application for an Emission Reduction Credit or an Authority to Construct authorizing such reductions is deemed complete, of any emissions reduction which:

- Is required or encumbered by any laws, rules, regulations, agreements, orders, or

No laws, rules, regulations, agreements or orders were responsible for the surrendering the facility's permits or their subsequent application for Emission Reduction Credits (ERC's).

- Is attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan, or

Currently there are no control measures noticed for workshop, or proposed or contained in a State Implementation Plan that require the reduction of the emissions at this facility.

- Is proposed in the APCO's adopted air quality plan pursuant to the California Clean Air Act.

The shutdown of cotton gins is not proposed in the APCO's adopted air quality plan.

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. By using 0.77 lb-PM_{10}/bale in our calculations for AER, we have assured that no credit was given for emissions that may have been in excess of the permitted limit of 1.67 lb-PM_{10}/bale. 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 – Emissions Reduction Credit Banking (12/17/92) 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 18, 2006. The applicant surrendered the PTO and permanently ceased operations at this location on December 14, 2006. Therefore, the application was submitted in a timely fashion.

VII. Recommendation:

I recommend based on the analysis above that Emission Reduction Credit application for Eagle Valley Ginning, LLC is complete and final review can proceed.

List of Appendixes

A. Permit to Operate
B. Annual Records
C. Other Support Information

Appendix A: Permit to Operate C-0213-1-5

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-213-1-5 **EXPIRATION DATE:** 03/31/2010

EQUIPMENT DESCRIPTION:
COTTON GIN WITH THREE SAW GIN STANDS AND FEEDERS, SEVEN LINT CLEANERS, BATTERY CONDENSER, MOTES SYSTEM, TRASH SYSTEM, AND FOUR 3 MMBTU/HR NATURAL GAS-FIRED BURNERS

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
5. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
6. Daily ginning rate shall not exceed 120 tons of baled cotton per day (480 bales/day, corrected to 500-pound bales). [District Rule 2201]
7. Annual ginning rate shall not exceed 12,000 tons of baled cotton per year (48,000 bales/year, corrected to 500-pound bales). [District Rule 2201]
8. PM10 emissions shall not exceed 6.68 pounds per ton of baled cotton (1.67 pounds per bale, corrected to 500-pound bales). [District Rule 2201]
9. Emissions from the natural gas-fired burners shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.02 lb-CO/MMBtu. [District Rule 2201]
10. Unloading (wagon and module feeder) shall be served by two 48-inch 1D-3D cyclone collectors. [District Rule 2201]
11. The #1A pre-cleaning system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
12. The #1B pre-cleaning system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
13. The #2A pre-cleaning system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
14. The #2B pre-cleaning system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
15. The overflow shall be served by one 42-inch 2D-2D cyclone collector. [District Rule 2201]
16. Main trash system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
17. Feeder trash system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
18. Feeders, gin stands and battery condenser shall be served by three screen rooms. [District Rule 2201]
19. Motes shall be served by one 62-inch 2D-2D, one 32-inch 2D-2D, and one 28-inch 2D-2D cyclone collectors. [District Rule 2201]
20. Motes transfer shall be served by one 28-inch 2D-2D cyclone collector. [District Rule 2201]
21. Permittee shall maintain daily records of the number and weight of bales produced. [District Rule 1070]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

22. The trash loading area shall be enclosed with four sides that are higher than the trash auger. Two sides shall be solid. The remaining sides shall have flexible wind barriers that extend below the top of the trash trailer sides. [District Rule 4204]
23. Permittee shall conduct daily visual inspections of the material handling systems for leaks, breaks, or other visible signs of equipment malfunctions. [District Rule 4204]
24. Permittee shall maintain a record of the daily inspections of the material handling systems, including any equipment malfunctions discovered and corrective action taken to repair the malfunction, and any source test results. [District Rule 4204]
25. All records shall be retained on site for five years and made available to the District upon request. [District Rules 1070 and 4204]

Appendix B: Annual Records

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:	**Eagle Valley Ginning LLC**
Gin Location:	**39936 W. North Avenue, Mendota, CA**

1. Are the emission reductions due to the installation of control equipment at an existing cotton gin? **n/a**

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

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-213-1-5**

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 surrendered?)

   MM/DD/YY: **12 /15 / 06**

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

Season	2002	2003	2004	2005	2006
Start MM/DD/YY	10/08/02	10/17/03	10/04/04	10/13/05	
End MM/DD/YY	12/11/02	01/12/04	01/11/05	12/19/05	
No. of Bales*	23558	31090	34254	22834	0

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

(Please continue on other side)

Proposal for Emission Reduction Credits (ERCs) for the Shutdown of Eagle Valley Ginning LLC located at 39936 W. North Avenue, Mendota, CA 93640

Historical Production Data (Bales Ginned and therms of Natural Gas Consumed) -

PRODUCTION DATA		
Year	**Bales Ginned**	**Therms Natural Gas Consumed**
2006	0	60
2005	22834	72403
2004	34254	90708
2003	31090	47799
2002	23558	38390

Baseline Period –

Two consecutive years = 2002 and 2003
[Note: This two year average most closely reflects the 10 year average bale production for this gin – see attached]

Bales = (23,558 + 31,090)/2
Bales = 27,324.0

Therms Natural Gas consumed = (38390 + 47799)/2
Therms Natural Gas consumed = 43,094.5

Historical Actual Emissions (HAE) -

Cotton Gin Emission Factor -

As listed in permit condition No. 8 (PTO#: C-213-1-5), emissions from this gin are equal to 1.67 lbs. PM10/bale. However, this reflects the use of "2D-2D" cyclones as control equipment. With the passage of Rule 4204 – Cotton Gins, the emission factor must be revised to reflect the use of "1D-3D" cyclones as the required control technology. Therefore, the revised emission factor, based upon the latest version of the California Cotton Ginners Association's Cotton Gin Emission Factor Handbook, is proposed to be 0.78 lbs. PM10 per bale.

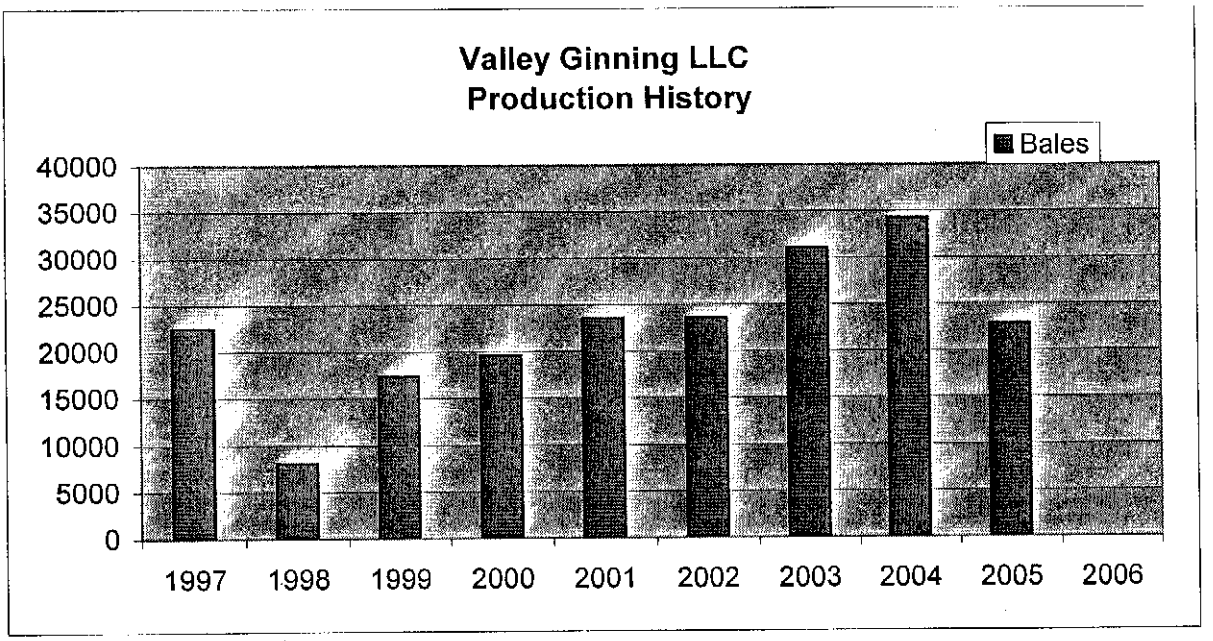
5. Provide emission factors (EF) in pounds of PM_{10} emissions per 500 pound bale:

System	Pre-mod or Pre-shutdown EF	References
Unloading	**0.11**	(1)
#1 Precleaning	**0.11**	(1)
#2 Precleaning	**0.09**	(1)
Overflow	**0.04**	(1)
Gin Stand/Feeder Trash	**0.08**	(1)
#1 Lint Cleaning	**0.10**	(1)
#2 Lint Cleaning	**0.03**	(1)
Main Trash	**0.09**	(1)
Motes	**.07**	(1)
Motes Trash	**.03**	(1)
Battery Condenser	**.03**	(1)
Totals	**0.78**	

(1) – CCGA Cotton Gin Emission Factor Handbook

Valley Ginning LLC

Year	Bales	2 yr. Averages	Comp. w/ 10 yr.	
1997	22519			
1998	8067			
1999	17363			
2000	19635			
2001	23520			
2002	23558			
2003	31090	27324.0	7040	Most Closely Matches 5 yr. average
2004	34254	32672.0	12388	
2005	22834	28544.0	8260	
2006	0	11417.0	8867	
Average =	20284.0			



Appendix C: Other Support Information

VII. CALCULATIONS

A. Assumptions

- Maximum operating schedule shall be 24 hours/day (worst-case scenario).
- Ginning rate for the saw-type gin shall remain at 480 bales per day.
- Annual ginning rate shall not exceed 8,750 tons of baled cotton per season (35,000 bales per season, adjusted to 500-pound bales).

B. Emission Factors

Both gins are equipped with tower dryers fueled by natural gas.

Emission Factors for Combustion of Natural gas	
Pollutant	Emission Factor [lb/MMBtu]
NO_X	0.1
CO	0.02
VOC	0.006
PM_{10}	---[2]
SO_X	0.0029[3]

1 Emission Factors for natural gas obtained from District letter, dated February 26, 2001
2 Since the dryers' combustion is discharged through the cyclones, its PM_{10} emissions are assumed included with the ginning emissions.
3 Based on a sulfur content of 1.0 gr/100 scf pursuant to District Policy APR 1720

The pre-project emission factors are taken from Project #1021007 and are listed in the table below. All emission factors were cited from the California Cotton Ginners Association's (CCGA) Cotton Gin Emission Factor Handbook (see Appendix C).

Pre-Project Ginning Emission Factors (Saw-Type)		
Process	Control Device	Emission Factor [lb PM_{10}/bale]
Unloading	1D-3D Cyclone	0.11
#1 Precleaning	2D-2D Cyclone	0.29
#2 Precleaning	2D-2D Cyclone	0.23
Overflow	2D-2D Cyclone	0.06
Main Trash	2D-2D Cyclone	0.08
#1 Lint Cleaner	Screen Basket	0.23
#2 Lint Cleaner	Screen Basket	0.23
Battery Condenser	Screen Basket	0.17
Motes	2D-2D Cyclone	0.23
Mote Transfer	2D-2D Cyclone	0.04
	TOTAL	**1.67**

VIII. COMPLIANCE (Continued)

RULE 4102: Nuisance

Section 4.0 prohibits discharge of air contaminants that could cause injury, detriment, nuisance or annoyance to the public. This operation is not expected to produce a public nuisance based on past operations at this facility. No past complaints have been noted against this facility.

CH&SC 41700 California Health and Safety Code

The Risk Management Policy for Permitting New and Modified Source (APR 1905, 3/2/01) only applies to new and modified sources as defined in District Rule 2201. Since this facility has no increase in emissions or hazardous air pollutants (HAPs), then pursuant to the District's toxic policy a Health Risk Assessment is not required.

RULE 4201: Particulate Matter Concentration

According to Section 3.1 particulate matter (PM) emissions from each source operation should not exceed 0.1 grains per cubic foot of gas at dry standard conditions. The calculation is based on a 480 bales/day ginning rate and the airflow of the cyclone(s). Emission Factors are from Section VII.B of this evaluation.

$$PM_{10}\ (gr/dscf) = \frac{(lb\ PM_{10}/bale)(7000\ gr/lb\ PM_{10})\ (2\ lb\ PM/lb\ PM10)(bales/day)}{(scf/min)\ (1440\ min/day)}$$

- Unloading:

$$PM_{10}\ (gr/dscf) = \frac{(0.11\ lb\ PM_{10}/bale)(7000\ gr/lb\ PM_{10})\ (2)(480\ bales/day)}{(12{,}800\ cfm)\ (1440\ min/day)}$$

PM (gr/dscf) = 0.04 ≤ 0.1 gr/dscf

- #1 Precleaner:

$$PM_{10}\ (gr/dscf) = \frac{(0.29\ lb\ PM_{10}/bale)(7000\ gr/lb\ PM_{10})(2)(480\ bales/day)}{(15{,}042\ cfm)\ (1440\ min/day)}$$

PM (gr/dscf) = 0.09 ≤ 0.1 gr/dscf

VIII. COMPLIANCE (Continued)

- #2 Precleaner:

PM_{10} (gr/dscf) = (0.23 lb PM_{10}/bale)(7000 gr/lb PM_{10})(2) (480 bales/day) / (15,042 cfm) (1440 min/day)

PM (gr/dscf) = 0.07 ≤ 0.1 gr/dscf

- Overflow:

PM_{10} (gr/dscf) = (0.06 lb PM_{10}/bale)(7000 gr/lb PM_{10})(2) (480 bales/day) / (4,594 cfm) (1440 min/day)

PM (gr/dscf) = 0.06 ≤ 0.1 gr/dscf

- Main Trash

PM_{10} (gr/dscf) = (0.08 lb PM_{10}/bale)(7000 gr/lb PM_{10})(2) (480 bales/day) / (7,521 cfm) (1440 min/day)

PM (gr/dscf) = 0.05 ≤ 0.1 gr/dscf

- #1 Lint Cleaner:

PM_{10} (gr/dscf) = (0.23 lb PM_{10}/bale)(7000 gr/lb PM_{10})(2) (480 bales/day) / (16,666 cfm) (1440 min/day)

PM (gr/dscf) = 0.06 ≤ 0.1 gr/dscf

- #2 Lint Cleaner:

PM_{10} (gr/dscf) = (0.23 lb PM_{10}/bale)(7000 gr/lb PM_{10})(2) (480 bales/day) / (10,000 cfm) (1440 min/day)

PM (gr/dscf) = 0.1 ≤ 0.1 gr/dscf

- Battery Condenser:

PM_{10} (gr/dscf) = (0.17 lb PM_{10}/bale)(7000 gr/lb PM_{10})(2) (480 bales/day) / (26,000 cfm) (1440 min/day)

PM (gr/dscf) = 0.03 ≤ 0.1 gr/dscf

VIII. COMPLIANCE (Continued)

- Motes:

$$PM_{10}\ (gr/dscf) = \frac{(0.23\ lb\ PM_{10}/bale)(7000\ gr/lb\ PM_{10})(2)\ (480\ bales/day)}{(13{,}349\ cfm)\ (1440\ min/day)}$$

PM (gr/dscf) = 0.08 ≤ 0.1 gr/dscf

- Motes Transfer:

$$PM_{10}\ (gr/dscf) = \frac{(0.04\ lb\ PM_{10}/bale)(7000\ gr/lb\ PM_{10})(2)\ (480\ bales/day)}{(2{,}042\ cfm)\ (1440\ min/day)}$$

PM (gr/dscf) = 0.09 ≤ 0.1 gr/dscf

All systems are being presented to show compliance. Only the unloading system, preplanning system #1, preplanning system #2 and the motes cleaner system are being modified.

Therefore compliance with this rule is expected.

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 about 1,500 lb of seed cotton per bale of finished cotton (per applicant) and drops to about 500 lb of lint cotton per bale of finished cotton, but the process weights for points in between are unknown.

Below, emissions are checked at the unloading and the #1 lint cleaner points (i.e. beginning and near the end of the ginning process), where the emission rates are the highest.

1. unloading:

For Process Rate (P) = 20.0 bales/hr x 1,500 lb/bale
= 30,000 lb/hr of seed cotton
= 15.0 tons/hr

POST EMISSIONS

Date: 3/30/2002

Client : Valley Ginning LLC

GIN RATE: 20 BPH

SYSTEM: 2D existing and 1D-3D on Condensers; Motes and Condenser collector robber system.	LB./PM10 BALE	C.F.M.	G/DSCF PM10	G/DSCF TSP
Unloading	0.11	12,800	0.020	0.040
#1 moist air	0.29	15,042	0.045	0.090
#2 moist air	0.23	15,042	0.036	0.071
Main trash	0.08	7,520	0.025	0.050
Over Flow	0.06	4,594	0.030	0.061
Motes A & B	0.07	20,000	0.008	0.016
Motes transfer	0.04	2,000	0.047	0.093
#1 & 2 Lint cleaner condenser	0.11	52,500	0.005	0.010
Battery Condenser	0.03	26,000	0.003	0.005
Condenser collector robber system	0.07	14,130	0.012	0.023
	1.09	169,628		

TSP = 2.18 LB. PM/BALE

TSP = 0.03 G/DSCF

12/18/2002

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

Rea: Valley Ginning LLC
39936 W. North Ave.
Mendota, CA 93640

ATC/PTO: C-213-1-1

Post Emission Factors.

This is the composition of emission factors that has been summarized in the ATC application dated 11-18-02 under emission factors - gin systems:

1.	Unloading. *(CCGA emission factor handbook)*		0.11
2.	#1 Dryer & Cleaner. *(CCGA emission factor handbook)*		0.11
3.	#2 Dryer & Cleaner. *(CCGA emission factor handbook)* & Mote cleaner trash *(CCGA emission factor handbook)*	*0.08* *0.02*	0.10
4.	Feeder dust, super jet trash (SIMILAR) *(CCGA emission factor handbook interpolating from lint trash robber system, motes cleaner trash)*	*0.05*	0.05
5.	Overflow. *(CCGA emission factor handbook)*		0.04

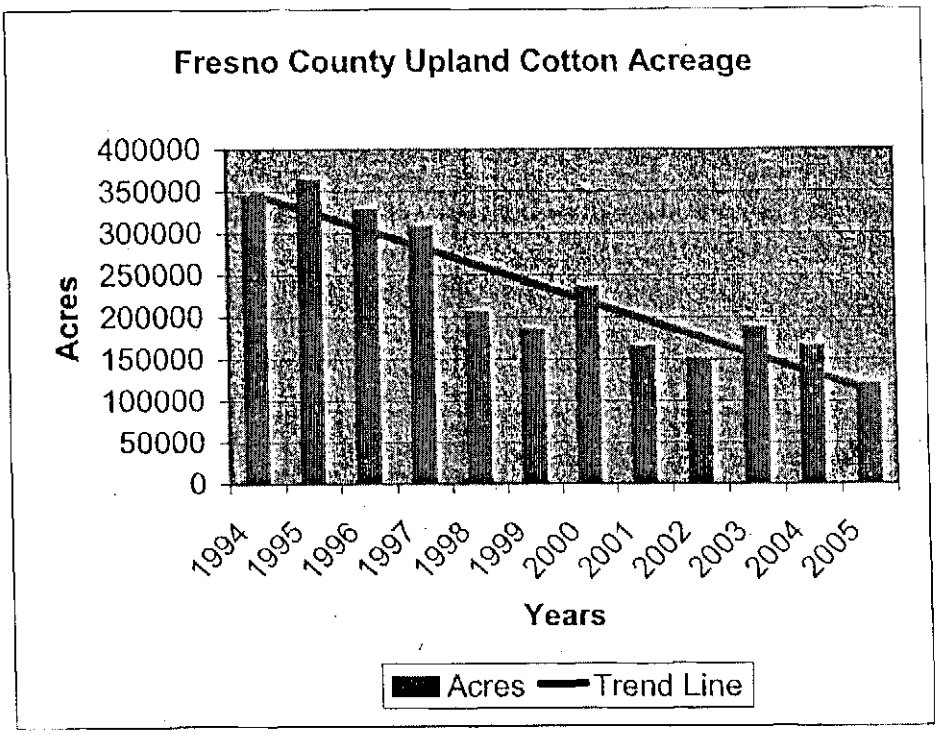
Valley Ginning continued:

6.	Main trash, stick Machine trash, Unloading collector bleed, *(CCGA emission factor handbook interpolating to stay under maximum allowable emissions)*	.09 *.04*	*0.13*
7.	Motes A & B. *(CCGA emission factor handbook interpolating to stay under maximum allowable emissions)*		0.07
8.	Mote transfer. *(CCGA emission factor handbook interpolating to stay under maximum allowable emissions)*		0.04
9.	Lint trash robber system (CCGA emission factor handbook)		0.07
10.	Lint cleaning. *(CCGA emission factor handbook)*		0.11
11.	Battery Condenser. *(CCGA emission factor handbook)*		0.03
		Total	0.86

#20 Modes = Mode Transfer

Fresno County
Upland Cotton Acreage

Year	Acres
1994	345000
1995	363000
1996	328000
1997	308000
1998	206000
1999	185000
2000	236000
2001	164500
2002	150000
2003	187000
2004	165140
2005	120190



☐ NORTHERN REGION
☒ CENTRAL REGION
☐ SOUTHERN REGION

ERC/PUBLIC NOTICE CHECK LIST

PROJECT #s: C-1063777

REQST.	COMPL.	
__	__	ERC TRANSFER OF PREVIOUSLY BANKED CREDITS
√	__	ERC PRELIMINARY PUBLIC NOTICE
__	__	ERC FINAL PUBLIC NOTICE
__	__	NSR/CEQA PRELIMINARY PUBLIC NOTICE
__	__	NSR/CEQA FINAL PUBLIC NOTICE

√ ☒ Newspaper Notice Emailed to Clerical (Check box and tab to generate Notice)

ENCLOSED DOCUMENTS REQUIRE:

__ __ Enter Correct Date, Print All Documents from File and Obtain Directors Signature

√ √ Send ***PRELIMINARY*** Notice Letters to CARB, EPA and Applicant; Including the Following Attachments:
√ Application Evaluation
√ Other Public Notice

√ √ Send ***PRELIMINARY*** Public Notice for Publication to Fresno Bee

√ √ Send Signed Copies of ***PRELIMINARY*** Notice Letters to:
Darrin Pampaian

__ __ Director's Signature and District Seal Embossed on ERC Certificates

__ __ Director's Signature on Cover Letter and Mail Cover Letter & ERC Certificates by Certified Mail to:
__ Applicant:
__ Applicant and Additional Addressees (see cover letters)
__ Other

__ __ Send Copies of Signed and Seal Embossed ERC Certificates and Signed cover letter to Regional Office Attn:

__ __ Other Special Instructions (please specify):_____

Date Completed March 20, 2007 /By Joven Refuerzo

ENG 3/22

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 to Eagle Valley Ginning, LLC for the shutdown of a cotton gin, at 39936 W. North Ave., in Mendota. The quantity of ERCs proposed for banking is 40 lb-VOC-yr, 734 lb-NOx/yr, 147 lb-CO/yr, 18,935 lb-PM10/yr, and 5 lb-SOx/yr.

The analysis of the regulatory basis for these proposed actions, Project #C-1063777, 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 DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.

D. Pampaian

Story #117769 System FRSCZ by JALONZO Time 11:48:03 Date 3/26/07

Account: 2306000SAN Class: 894 Last user: JALONZO

Ad Start: 3/28/07 Ad Stop: 3/28/07 Total Cost: $219.96 Run Days: wed Pag

PUBLIC NOTICE

#182366

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 to Eagle Valley Ginning, LLC for the shutdown of a cotton gin, at 39936 W. North Ave., in Mendota. The quantity of ERCs proposed for banking is 40 lb-VOC-yr, 734 lb-NOx/yr, 147 lb-CO/yr, 18,935 lb-PM10/yr, and 5 lb-SOx/yr.

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(PUB: March 28, 2007)

DP

RECEIVED

APR 02 2007

FINANCE
SJVAPCD

SAN JOAQUIN VALLEY APCD

ATTN FINANCE DEPARTMENT

1990 E GETTYSBURG AVE

FRESNO , CA 93726

PROOF OF PUBLICATION

COUNTY OF FRESNO
STATE OF CALIFORNIA

EXHIBIT A.

PUBLIC NOTICE

#182366

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

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(PUB: March 28, 2007)

The undersigned states:

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

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

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

March 28, 2007

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

Dated MARCH 28, 2007

FPROOFAD

FedEx. US Airbill
Express

FedEx Tracking Number 8559 5580 7326

SAG24

0215

Sender's Copy

1 From *Please print and press hard.*

Date

Sender's FedEx Account Number 1500-4459-6

Sender's Name D. WARNER Phone (559) 230-6000

Company SJV UNIFIED AIR POLLUTION DIS

Address 1990 E GETTYSBURG AVE

Dept./Floor/Suite/Room

City FRESNO State CA ZIP 93726-0244

2 Your Internal Billing Reference First 24 characters will appear on invoice. C-1063232 OPTIONAL C-1063777

3 To

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

Company US EPA-REGION IX

Recipient's Address 75 HAWTHORNE ST

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Dept./Floor/Suite/Room

Address

To request a package be held at a specific FedEx location, print FedEx address here.

City SAN FRANCISCO State CA ZIP 94105

0334457215

4a Express Package Service *Packages up to 150 lbs.*

- [ ] FedEx Priority Overnight — Next business morning.* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- [X] FedEx Standard Overnight — Next business afternoon.* Saturday Delivery NOT available.
- [ ] FedEx First Overnight — Earliest next business morning delivery to select locations.* Saturday Delivery NOT available.
- [ ] FedEx 2Day — Second business day.* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- [ ] FedEx Express Saver — Third business day.* Saturday Delivery NOT available.

FedEx Envelope rate not available. Minimum charge: One-pound rate.

* To most locations.

4b Express Freight Service *Packages over 150 lbs.*

- [ ] FedEx 1Day Freight* — Next business day.** Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- [ ] FedEx 2Day Freight — Second business day.** Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- [ ] FedEx 3Day Freight — Third business day.** Saturday Delivery NOT available.

* Call for Confirmation.

** To most locations.

5 Packaging

- [ ] FedEx Envelope*
- [ ] FedEx Pak* — Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak.
- [ ] FedEx Box
- [ ] FedEx Tube
- [X] Other

* Declared value limit $500.

6 Special Handling — Include FedEx address in Section 3.

- [ ] **SATURDAY Delivery** NOT Available for FedEx Standard Overnight, FedEx First Overnight, FedEx Express Saver, or FedEx 3Day Freight.
- [ ] **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? One box must be checked.

- [ ] No
- [ ] Yes — As per attached Shipper's Declaration.
- [ ] Yes — Shipper's Declaration not required.
- [ ] Dry Ice — 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.

- [X] 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. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

FedEx Use Only

8 *NEW* Residential Delivery Signature Options If you require a signature, check Direct or Indirect.

- [ ] No Signature Required — Package may be left without obtaining a signature for delivery.
- [ ] Direct Signature — Anyone at recipient's address may sign for delivery. *Fee applies.*
- [ ] Indirect Signature — If no one is available at recipient's address, anyone at a neighboring address may sign for delivery. *Fee applies.*

519

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FedEx. US Airbill Express

FedEx Tracking Number 8585 3818 4180

SHC22

Form 0215 — Sender's Copy

1 From *Please print and press hard.*

Date

Sender's FedEx Account Number 1500-4459-6

Sender's Name D. WARNER Phone (559) 230-6000

Company SJV UNIFIED AIR POLLUTION DIS

Address 1990 E GETTYSBURG AVE

Dept/Floor/Suite/Room

City FRESNO State CA ZIP 93726-0244

2 Your Internal Billing Reference First 24 characters will appear on invoice. C-4083777 OPTIONAL

3 To

Recipient's Name MIKE TOLLSTRUP Phone (916) 322-6026

Company CARB-PROJECT ASSESMENT BRANCH

Recipient's Address 1001 I STREET 6TH FL

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Dept/Floor/Suite/Room

Address

To request a package be held at a specific FedEx location, print FedEx address here.

City SACRAMENTO State CA ZIP 95814

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Store your addresses at fedex.com
Simplify your shipping. Manage your account. Access all the tools you need.

4a Express Package Service *Packages up to 150 lbs.*

- ☐ FedEx Priority Overnight — Next business morning.* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
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FedEx Envelope rate not available. Minimum charge: One-pound rate. To most locations.

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* Call for Confirmation: ** To most locations.

5 Packaging

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- ☐ FedEx Pak* — Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak.
- ☐ FedEx Box
- ☐ FedEx Tube
- ☒ Other

* Declared value limit $500.

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- ☐ **HOLD Saturday** at FedEx Location **Available ONLY for** FedEx Priority Overnight and FedEx 2Day to select locations.

Does this shipment contain dangerous goods? One box must be checked.

- ☐ No
- ☐ Yes — As per attached Shipper's Declaration.
- ☐ Yes — Shipper's Declaration not required.
- ☐ Dry Ice — Dry Ice, 9, UN 1845 ____ x ____ kg
- ☐ Cargo Aircraft Only

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging.

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- ☒ 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

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8 *NEW* Residential Delivery Signature Options If you require a signature, check Direct or Indirect.

- ☐ No Signature Required — Package may be left without obtaining a signature for delivery.
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San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

MAR 2 1 2007

Bob Lange
Eagle Valley Ginning, LLC
27480 S. Bennett Rd.
Firebaugh, CA 93622

Re: Notice of Preliminary Decision - Emission Reduction Credits
Project Number: C-1063777

Dear Mr. Lange:

Enclosed for your review and comment is the District's analysis of Eagle Valley Ginning, LLC's application for Emission Reduction Credits (ERCs) resulting from the shutdown of a cotton gin, at 39936 W. North Ave., in Mendota. The quantity of ERCs proposed for banking is 40 lb-VOC-yr, 734 lb-NOx/yr, 147 lb-CO/yr, 18,935 lb-PM10/yr, and 5 lb-SOx/yr.

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

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Darrin Pampaian of Permit Services at (559) 230-5899.

Sincerely,

David Warner
Director of Permit Services

DW:dp

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

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

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

www.valleyair.org

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

MAR 2 1 2007

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-1063777

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Eagle Valley Ginning, LLC's application for Emission Reduction Credits (ERCs) resulting from the shutdown of a cotton gin, at 39936 W. North Ave., in Mendota. The quantity of ERCs proposed for banking is 40 lb-VOC-yr, 734 lb-NOx/yr, 147 lb-CO/yr, 18,935 lb-PM10/yr, and 5 lb-SOx/yr.

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Sincerely,

David Warner
Director of Permit Services

DW:dp

Enclosure

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

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

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

www.valleyair.org

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

MAR 2 1 2007

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-1063777

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of Eagle Valley Ginning, LLC's application for Emission Reduction Credits (ERCs) resulting from the shutdown of a cotton gin, at 39936 W. North Ave., in Mendota. The quantity of ERCs proposed for banking is 40 lb-VOC-yr, 734 lb-NOx/yr, 147 lb-CO/yr, 18,935 lb-PM10/yr, and 5 lb-SOx/yr.

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

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Darrin Pampaian of Permit Services at (559) 230-5899.

Sincerely,

David Warner
Director of Permit Services

DW:dp

Enclosure

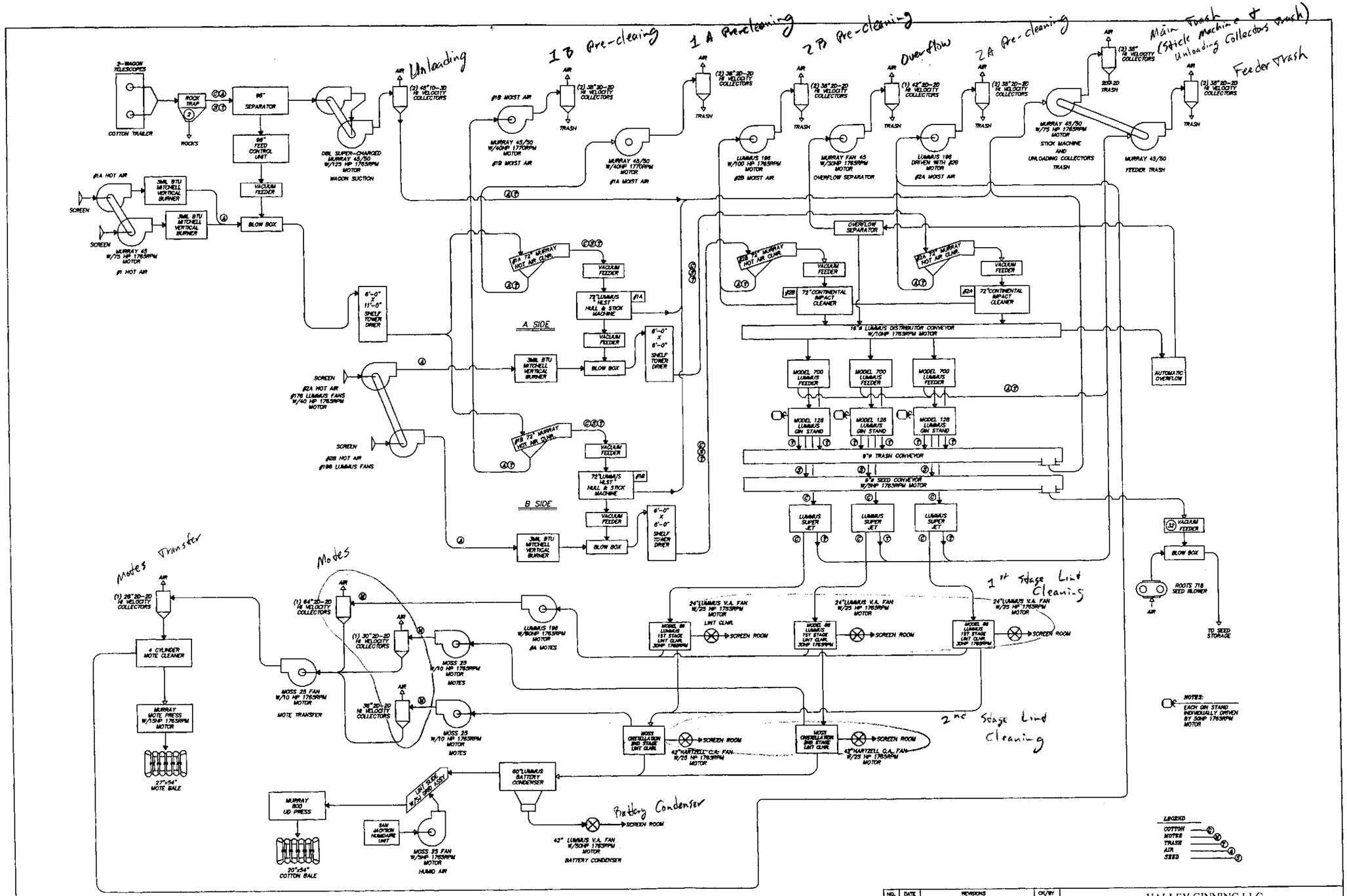
Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

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

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

www.valleyair.org



NO.	DATE	REVISIONS	CK'BY

VALLEY GINNING LLC

PRE PROJECT FLOW DIAGRAM

APPROVALS

CHIEF ENGR

ELECTRICAL

MECHANICAL

STRUCTURAL

DRAWN BY: Donavon

CHECKED

DATE: 11-18-02

SCALE: None

PROJECT LOCATION: MENDOTA, CA

APCD Facility ID – PTO: C-213-1-1

SHEET NO.: FD -01

DATE: 11-18-02

DALE BRISCO, INC.
FOWLER, CALIFORNIA

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

FILE

MAR 2 0 2007

Bob Lange
Eagle Valley Ginning, LLC
27480 S. Bennett Rd.
Firebaugh, CA 93622

Re: Notice of Receipt of Complete Application - Emission Reduction Credits
Project Number: C-1063777

Dear Mr. Lange:

The District has completed a preliminary review of your application for Emission Reduction Credits (ERCs) resulting from the shutdown of the cotton gin, at 39936 W. North Ave. in Mendota.

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. Arnaud Marjollet at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

P. Arnaud Marjollet

Arnaud Marjollet
Permit Services Manager

DW:dp

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
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2700 M Street, Suite 275
Bakersfield, CA 93301-2373
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www.valleyair.org

Eagle Valley Ginning LLC

December 14, 2006

Mr. Dave Warner
Director of Permit Services
San Joaquin Valley Unified Air Pollution Control District
1990 E. Gettysburg
Fresno, CA 93726

Re: **Shutdown of Eagle Valley Ginning LLC (PTO#: C-213-1-5)**

Dear Mr. Warner,

This letter is to officially notify you that the Eagle Valley Ginning LLC is shutting down, and hereby forfeiting, the permit to operate (PTO#: C-213-1-5) for the cotton gin located at 39936 W. North Avenue in Mendota, California.

Should you have any questions, please contact me at (209)364-6162.

Sincerely,

Bob Lange
Manager

C: Roger A. Isom, CCGGA

27480 S. Bennett Rd * Firebaugh, CA 93622 * Office 209.364.6162/559.655.4778 * Fax 209.364.6506 * evg@dospalos.org

San Joaquin Valley
Air Pollution Control District

Permit to Operate

FACILITY: C-213 **EXPIRATION DATE:** 03/31/2010

LEGAL OWNER OR OPERATOR: EAGLE VALLEY GINNING LLC
MAILING ADDRESS: 27480 S BENNETT RD
FIREBAUGH, CA 93622

FACILITY LOCATION: 39936 W NORTH AVE
MENDOTA, CA 93640

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

David Warner
Director of Permit Services

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-213-1-5 **EXPIRATION DATE:** 03/31/2010

EQUIPMENT DESCRIPTION:
COTTON GIN WITH THREE SAW GIN STANDS AND FEEDERS, SEVEN LINT CLEANERS, BATTERY CONDENSER, MOTES SYSTEM, TRASH SYSTEM, AND FOUR 3 MMBTU/HR NATURAL GAS-FIRED BURNERS

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
5. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
6. Daily ginning rate shall not exceed 120 tons of baled cotton per day (480 bales/day, corrected to 500-pound bales). [District Rule 2201]
7. Annual ginning rate shall not exceed 12,000 tons of baled cotton per year (48,000 bales/year, corrected to 500-pound bales). [District Rule 2201]
8. PM10 emissions shall not exceed 6.68 pounds per ton of baled cotton (1.67 pounds per bale, corrected to 500-pound bales). [District Rule 2201]
9. Emissions from the natural gas-fired burners shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.02 lb-CO/MMBtu. [District Rule 2201]
10. Unloading (wagon and module feeder) shall be served by two 48-inch 1D-3D cyclone collectors. [District Rule 2201]
11. The #1A pre-cleaning system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
12. The #1B pre-cleaning system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
13. The #2A pre-cleaning system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
14. The #2B pre-cleaning system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
15. The overflow shall be served by one 42-inch 2D-2D cyclone collector. [District Rule 2201]
16. Main trash system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
17. Feeder trash system shall be served by two 38-inch 2D-2D cyclone collectors. [District Rule 2201]
18. Feeders, gin stands and battery condenser shall be served by three screen rooms. [District Rule 2201]
19. Motes shall be served by one 62-inch 2D-2D, one 32-inch 2D-2D, and one 28-inch 2D-2D cyclone collectors. [District Rule 2201]
20. Motes transfer shall be served by one 28-inch 2D-2D cyclone collector. [District Rule 2201]
21. Permittee shall maintain daily records of the number and weight of bales produced. [District Rule 1070]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

22. The trash loading area shall be enclosed with four sides that are higher than the trash auger. Two sides shall be solid. The remaining sides shall have flexible wind barriers that extend below the top of the trash trailer sides. [District Rule 4204]

23. Permittee shall conduct daily visual inspections of the material handling systems for leaks, breaks, or other visible signs of equipment malfunctions. [District Rule 4204]

24. Permittee shall maintain a record of the daily inspections of the material handling systems, including any equipment malfunctions discovered and corrective action taken to repair the malfunction, and any source test results. [District Rule 4204]

25. All records shall be retained on site for five years and made available to the District upon request. [District Rules 1070 and 4204]

December 14, 2006

Mr. Dave Warner
Director of Permit Services
San Joaquin Valley Unified Air Pollution Control District
1990 E. Gettysburg
Fresno, CA 93726

Re: **Shutdown of Eagle Valley Ginning LLC (PTO#: C-213-1-5)**

Dear Mr. Warner,

Enclosed is an application to shut down the cotton ginning operation located at 39936 W. North Avenue in Mendota, California. Due to the serious reduction in cotton acreage, it is no longer economically feasible to maintain and operate this cotton gin.

Enclosed are the following:

- ☑ Check in the amount of $650 for the ERC application filing fee
- ☑ ERC application
- ☑ Supplemental Cotton Gin ERC application
- ☑ Production history (bales ginned and fuel consumed)
- ☑ Emission Calculations
- ☑ Letter forfeiting the permit to operate (w/ copy of permit to operate)

The attached documentation should provide the District with the information necessary to complete the processing of the ERC application. However, should you need additional information, please contact me at (209)364-6162.

Sincerely,

Bob Lange
Manager

C: Roger A. Isom, CCGGA

San Joaquin Valley Air Pollution Control District

RECEIVED
DEC 18 2006
Permits Srvc
SJVAPCD

Application for

☒ EMISSION REDUCTION CREDIT (ERC) ☐ CONSOLIDATION OF ERC CERTIFICATES

1. ERC TO BE ISSUED TO: Eagle Valley Ginning LLC — Facility ID: C-213 (if known)

2. MAILING ADDRESS: Street/P.O. Box: 27480 S. Bennett Road
City: Firebaugh State: CA Zip Code: 93622

3. LOCATION OF REDUCTION:
Street: 39936 W. North Avenue
City: Mendota, California
_____/4 SECTION _____ TOWNSHIP _____ RANGE _____

4. DATE OF REDUCTION: 12/15/06

5. PERMIT NO(S): C-213-1-5 EXISTING ERC NO(S):

6. METHOD RESULTING IN EMISSION REDUCTION:

☒ SHUTDOWN ☐ RETROFIT ☐ PROCESS CHANGE ☐ OTHER

DESCRIPTION: Shutdown of existing cotton gin.

(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	19.4	542.9	73.7	19,181.4	13.6	

8. SIGNATURE OF APPLICANT:

TYPE OR PRINT TITLE OF APPLICANT: Manager

9. TYPE OR PRINT NAME OF APPLICANT: Bob Lange

DATE: 12/15/06

TELEPHONE NO: 209-364-6162

FOR APCD USE ONLY:

DATE STAMP

FILING FEE RECEIVED: $ 650.00 #004002

DATE PAID: 12/18/06

PROJECT NO.: C-1063777 FACILITY ID.: C-213

Northern Regional Office * 4230 Kiernan Avenue, Suite 130 * Modesto, California 95356-9321 * (209) 557-6400 * FAX (209) 557-6475
Central Regional Office * 1990 East Gettysburg Avenue * Fresno, California 93726-0244 * (559) 230-5900 * FAX (559) 230-6061
Southern Regional Office * 2700 M Street, Suite 275 * Bakersfield, California 93301-2370 * (661) 326-6900 * FAX (661) 326-6985

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:	**Eagle Valley Ginning LLC**
Gin Location:	**39936 W. North Avenue, Mendota, CA**

1. Are the emission reductions due to the installation of control equipment at an existing cotton gin? **n/a**

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

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-213-1-5**

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 surrendered?)

   MM/DD/YY: **12 /15 / 06**

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

Season	2002	2003	2004	2005	2006
Start MM/DD/YY	**10/08/02**	**10/17/03**	**10/04/04**	**10/13/05**	
End MM/DD/YY	**12/11/02**	**01/12/04**	**01/11/05**	**12/19/05**	
No. of Bales*	**23558**	**31090**	**34254**	**22834**	**0**

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

(Please continue on other side)

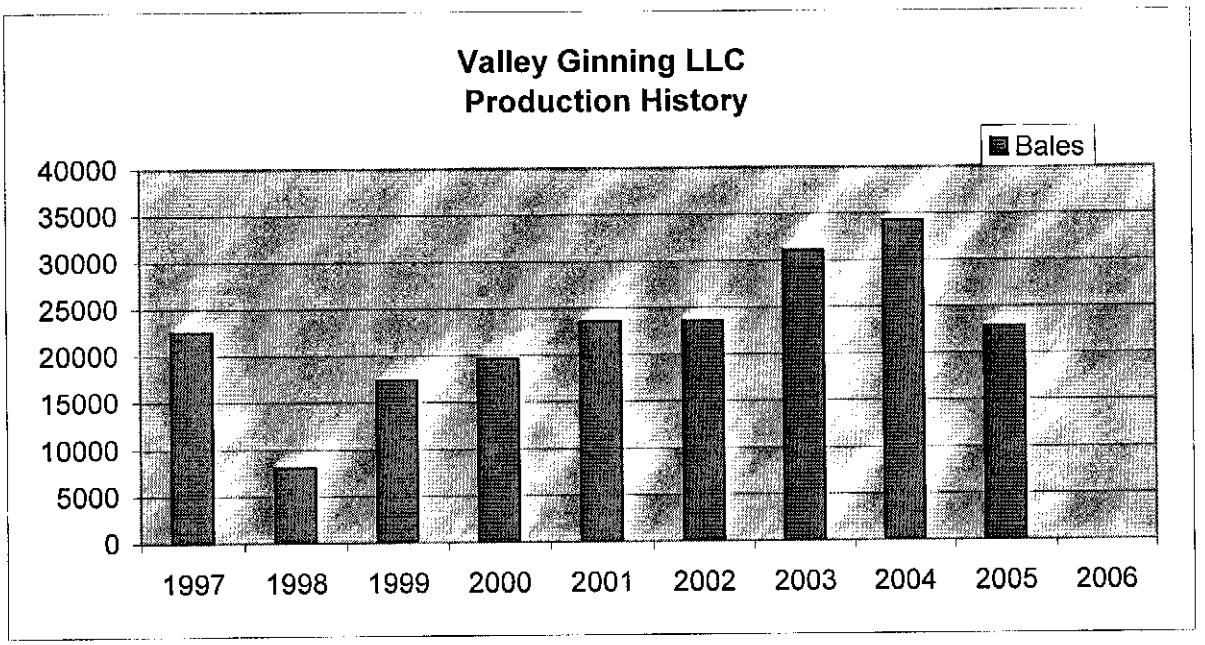
5. Provide emission factors (EF) in pounds of PM_{10} emissions per 500 pound bale:

System	Pre-mod or Pre-shutdown EF	References
Unloading	**0.11**	(1)
#1 Precleaning	**0.11**	(1)
#2 Precleaning	**0.09**	(1)
Overflow	**0.04**	(1)
Gin Stand/Feeder Trash	**0.08**	(1)
#1 Lint Cleaning	**0.10**	(1)
#2 Lint Cleaning	**0.03**	(1)
Main Trash	**0.09**	(1)
Motes	**.07**	(1)
Motes Trash	**.03**	(1)
Battery Condenser	**.03**	(1)
Totals	**0.78**	

(1) – CCGA Cotton Gin Emission Factor Handbook

Valley Ginning LLC

Year	Bales	2 yr. Averages	Comp. w/ 10 yr.	
1997	22519			
1998	8067			
1999	17363			
2000	19635			
2001	23520			
2002	23558			
2003	31090	**27324.0**	7040	Most Closely Matches 5 yr. average
2004	34254	32672.0	12388	
2005	22834	28544.0	8260	
2006	0	11417.0	8867	
Average =	20284.0			



Proposal for Emission Reduction Credits (ERCs) for the Shutdown of Eagle Valley Ginning LLC located at 39936 W. North Avenue, Mendota, CA 93640

Historical Production Data (Bales Ginned and therms of Natural Gas Consumed) -

PRODUCTION DATA		
Year	**Bales Ginned**	**Therms Natural Gas Consumed**
2006	0	60
2005	22834	72403
2004	34254	90708
2003	31090	47799
2002	23558	38390

Baseline Period –

Two consecutive years = 2002 and 2003
[Note: This two year average most closely reflects the 10 year average bale production for this gin – see attached]

Bales = (23,558 + 31,090)/2
Bales = 27,324.0

Therms Natural Gas consumed = (38390 + 47799)/2
Therms Natural Gas consumed = 43,094.5

Historical Actual Emissions (HAE) -

Cotton Gin Emission Factor -

As listed in permit condition No. 8 (PTO#: C-213-1-5), emissions from this gin are equal to 1.67 lbs. PM10/bale. However, this reflects the use of "2D-2D" cyclones as control equipment. With the passage of Rule 4204 – Cotton Gins, the emission factor must be revised to reflect the use of "1D-3D" cyclones as the required control technology. Therefore, the revised emission factor, based upon the latest version of the California Cotton Ginners Association's Cotton Gin Emission Factor Handbook, is proposed to be 0.78 lbs. PM10 per bale.

Cotton Gin Emissions -
HAE = Emission Factor (lb PM10/Bale) x Baseline Period Production History (bales/yr)
HAE = 0.78 lb PM10/bale x 27,324 bales/yr
HAE = 21,312.7 lb PM10/yr

Natural Gas Combustion Emission Factors –

Natural Gas Emission Factors	
Pollutant	**Emission Factor (lb/1000 therms)**
NOx	10
SOx	0.3
CO	2
VOC	0.6

Natural Gas Combustion Emissions -

HAE = Emission Factor (lb/1000 therms) x 1000 therms burned

Natural Gas Emission Calculations (HAE)			
Pollutant	**Emission Factor (lb/1000 therms)**	**Natural Gas Usage (therms)**	**Emissions (lb/yr)**
NOx	14 ?	43094.5	**603.3**
SOx	0.35	43094.5	**15.1**
CO	1.9	43094.5	**81.9**
VOC	0.5	43094.5	**21.5**

Incorrect

Actual Emission Reductions (AER) -

For shutdowns, AER = HAE

Actual Emission Reduction Calculations	
Pollutant	**AER (lb/yr)**
PM10	**21,312.7**
NOx	**603.3**

SOx	**15.1**
CO	**81.9**
VOC	**21.5**

Air Quality Improvement Deduction (AQID) -

AQID = 10% AER

Air Quality Improvement Deduction Calculations		
Pollutant	**AER (lb/yr)**	**AQID (lb/yr)**
PM10	21,312.7	**2,131.3**
NOx	603.3	**60.3**
SOx	15.1	**1.5**
CO	81.9	**8.2**
VOC	21.5	**2.2**

Emission Reduction Credits (ERCs) -

Emission Reduction Credits (ERCs) =

Emission Reduction Credits (ERCs) = AER - AQID
ERCs = AER - AQID

Emission Reduction Credit Calculations			
Pollutant	**AER (lb/yr)**	**AQID (lb/yr)**	**ERCs (lb/yr)**
PM10	21,312.7	2,131.3	**19,181.4**
NOx	603.3	60.3	**542.9**
SOx	15.1	1.5	**13.6**
CO	81.9	8.2	**73.7**
VOC	21.5	2.2	**19.4**

San Joaquin Valley Air Pollution Control District

RECEIVED
DEC 18 2006
Permits Srvc
SJVAPCD

Application for

☒ EMISSION REDUCTION CREDIT (ERC) ☐ CONSOLIDATION OF ERC CERTIFICATES

1. ERC TO BE ISSUED TO: Eagle Valley Ginning LLC — Facility ID: C - 213 (if known)

2. MAILING ADDRESS: Street/P.O. Box: 27480 S. Bennett Road
City: Firebaugh State: CA Zip Code: 93622

3. LOCATION OF REDUCTION:
Street: 39936 W. North Avenue
City: Mendota, California
_____/4 SECTION _____ TOWNSHIP _____ RANGE _____

4. DATE OF REDUCTION:
12/15/06

5. PERMIT NO(S): C-213-1-5 EXISTING ERC NO(S):

6. METHOD RESULTING IN EMISSION REDUCTION:

☒ SHUTDOWN ☐ RETROFIT ☐ PROCESS CHANGE ☐ OTHER

DESCRIPTION: Shutdown of existing cotton gin.

(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	19.4	542.9	73.7	19,181.4	13.6	

8. SIGNATURE OF APPLICANT: Robert H. (Bob) Lange

TYPE OR PRINT TITLE OF APPLICANT: Manager

9. TYPE OR PRINT NAME OF APPLICANT: Bob Lange

DATE: 12/15/06

TELEPHONE NO: 209-364-6162

FOR APCD USE ONLY:

RECEIVED
DATE STAMPED
DEC 18 2006
FINANCE
SJVUAPCD

FILING FEE RECEIVED: $ 650.00 / CK# 4002
DATE PAID: 12/18/06 AP
PROJECT NO.: C-1063777 FACILITY ID.: C-213

acific Gas and Electric Company
CMT Reports/Account Services

Sales and Charges #3 - System Level
Energy Report
[By Service Agreement, Date]

For Eagle Valley Ginning LLC (YOS / 8010243)

A Id:5716317005 **Open: N** Bus Act Desc: Svc Descriptor: **From Jan 1, 2001 to Dec 11, 2006**

er Name: EAGLE VALLEY GINNING LLC Meter #: 40574380 Billing Addr: 27480 S BENNETT RD, FIREBAUGH, CA 93622
ect Id: 5716317146 Service Addr: NORTH & NEWCOMB AVE SW, SW 21 14 15 MENDOTA MENDOTA, CA 93640

ate	Days	Rate	Gas Charges (Dollars)	Therms	Electric Charges (Dollars)	On-Peak Usage (kwh)	Part-Peak Usage (kwh)	Off-Peak Usage (kwh)	Total Usage (kwh)	Hours	Billing Demand (kW)	Created Demand (kW)	On-Peak Demand (kW)	Part-Peak Demand (kW)	Off-Peak Demand (kW)	Taxes
2/22/2001	30	GNR1	146.67	80	—	0	0	0		0	0	0	0	0	0	0.00
1/23/2001	33	GNR1	100.17	69		0	0	0		0	0	0	0	0	0	0.00
Total for 2001:			14,544.52	30,023	0.00	0	0	0	0	0						0.00
otal for SA id: 5716317005:			255,964.47	279,383	0.00	0	0	0	0	0						2,012.34
eport Total:			255,964.47	279,383	0.00	0	0	0	0	0						**2,012.34**

Pacific Gas and Electric Company
CMT Reports/Account Services

Sales and Charges #3 - System Level
Energy Report
[By Service Agreement, Date]

For Eagle Valley Ginning LLC (YOS / 8010243)

SA Id:5716317005 **Open: N** Bus Act Desc: Svc Descriptor: **From Jan 1, 2001 to Dec 11, 2006**

Per Name: EAGLE VALLEY GINNING LLC Meter #: 40574380 Billing Addr: 27480 S BENNETT RD, FIREBAUGH CA 93622
Acct Id: 5716317146 Service Addr: NORTH & NEWCOMB AVE SW, SW 24 14 ,1 MENDOTA MENDOTA, CA 93640

Date	Days	Rate	Gas Charges (Dollars)	Therms	Electric Charges (Dollars)	On-Peak Usage (kwh)	Part-Peak Usage (kwh)	Off-Peak Usage (kwh)	Total Usage (kwh)	Hours	Billing Demand (kW)	Created Demand (kW)	On-Peak Demand (kW)	Part-Peak Demand (kW)	Off-Peak Demand (kW)	Taxes
09/23/2003	31	GNR1	10.65	0		0	0	0		0	0	0	0	0	0	0.00
08/23/2003	31	GNR1	10.65	0		0	0	0		0	0	0	0	0	0	0.00
07/23/2003	30	GNR1	10.31	0		0	0	0		0	0	0	0	0	0	0.00
06/23/2003	32	GNR1	10.99	0		0	0	0		0	0	0	0	0	0	0.00
05/22/2003	30	GNR1	13.95	5		0	0	0		0	0	0	0	0	0	0.00
04/22/2003	28	GNR1	32.23	27		0	0	0		0	0	0	0	0	0	0.00
03/25/2003	29	GNR1	53.82	46		0	0	0		0	0	0	0	0	0	0.00
02/24/2003	33	GNR1	63.44	59		0	0	0		0	0	0	0	0	0	0.00
01/22/2003	32	GNR1	60.68	56		0	0	0		0	0	0	0	0	0	0.00
Total for 2003:			41,837.34	47,799	0.00	0	0	0	0	0						0.00
12/21/2002	30	GNR1	12,464.25	16,747		0	0	0		0	0	0	0	0	0	0.00
11/21/2002	29	GNR1	10,315.59	15,819		0	0	0		0	0	0	0	0	0	0.00
10/23/2002	30	GNR1	3,426.15	5,709		0	0	0		0	0	0	0	0	0	0.00
09/23/2002	31	GNR1	10.50	0		0	0	0		0	0	0	0	0	0	0.00
08/23/2002	30	GNR1	10.50	0		0	0	0		0	0	0	0	0	0	0.00
07/24/2002	30	GNR1	10.50	0		0	0	0		0	0	0	0	0	0	0.00
06/24/2002	32	GNR1	10.50	0		0	0	0		0	0	0	0	0	0	0.00
05/23/2002	29	GNR1	10.50	0		0	0	0		0	0	0	0	0	0	0.00
04/24/2002	29	GNR1	10.50	0		0	0	0		0	0	0	0	0	0	0.00
03/26/2002	32	GNR1	21.41	19		0	0	0		0	0	0	0	0	0	0.00
02/22/2002	31	GNR1	51.36	64		0	0	0		0	0	0	0	0	0	0.00
01/22/2002	31	GNR1	33.61	32		0	0	0		0	0	0	0	0	0	0.00
Total for 2002:			25,975.37	38,390	0.00	0	0	0	0	0						0.00
12/22/2001	32	GNR1	8,155.94	14,823		0	0	0		0	0	0	0	0	0	0.00
11/20/2001	29	GNR1	4,501.43	11,518		0	0	0		0	0	0	0	0	0	0.00
10/22/2001	31	GNR1	1,492.91	3,492		0	0	0		0	0	0	0	0	0	0.00
09/21/2001	30	GNR1	10.50	0		0	0	0		0	0	0	0	0	0	0.00
08/22/2001	29	GNR1	10.50	0		0	0	0		0	0	0	0	0	0	0.00
07/24/2001	32	GNR1	10.51	0		0	0	0		0	0	0	0	0	0	0.00
06/23/2001	30	GNR1	13.50	3		0	0	0			0					0.00
05/23/2001	30	GNR1	13.50	2		0	0	0			0					0.00
04/23/2001	31	GNR1	14.16	3		0	0	0		0	0	0	0	0	0	0.00
03/23/2001	29	GNR1	80.73	47		0	0	0		0	0	0	0	0	0	0.00

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Pacific Gas and Electric Company
CMT Reports/Account Services

Sales and Charges #3 - System Level
Energy Report
(By Service Agreement, Date)

For Eagle Valley Ginning LLC (YOS / 8010243)

SA Id: 5716317005 **Open: N** Bus Act Desc: Svc Descriptor: **From Jan 1, 2001 to Dec 11, 2006**

Per Name: EAGLE VALLEY GINNING LLC Meter #: 40574380 Billing Addr: 27480 S BENNETT RD, FIREBAUGH, CA 93622
Acct Id: 5716317146 Service Addr: NORTH & NEWCOMB AVE SW, SW 24 14 13 MENDOTA MENDOTA, CA 93640

Date	Days	Rate	Gas Charges (Dollars)	Therms	Electric Charges (Dollars)	On-Peak Usage (kwh)	Part-Peak Usage (kwh)	Off-Peak Usage (kwh)	Total Usage (kwh)	Hours	Billing Demand (kW)	Created Demand (kW)	On-Peak Demand (kW)	Part-Peak Demand (kW)	Off-Peak Demand (kW)	Taxes
12/03/2006	13	GNR2	64.42	0		0	0	0		0	0	0	0	0	0	0.00
11/21/2006	32	GNR2	247.75	60		0	0	0		0	0	0	0	0	0	2.91
Total for 2006:			312.17	60	0.00	0	0	0	0	0						2.91
12/20/2005	31	GNR2	27,973.34	21,991		0	0	0		0	0	0	0	0	0	933.51
11/19/2005	30	GNR2	31,077.17	22,842		0	0	0		0	0	0	0	0	0	969.63
10/20/2005	29	GNR2	3,308.48	2,438		0	0	0		0	0	0	0	0	0	103.50
9/21/2005	30	GNR2	148.65	0		0	0	0		0	0	0	0	0	0	0.00
8/22/2005	32	GNR2	158.56	0		0	0	0		0	0	0	0	0	0	0.00
7/21/2005	30	GNR2	148.66	0		0	0	0		0	0	0	0	0	0	0.00
6/21/2005	32	GNR2	158.57	0		0	0	0		0	0	0	0	0	0	0.00
5/20/2005	31	GNR2	155.44	2		0	0	0		0	0	0	0	0	0	0.00
4/19/2005	28	GNR1	61.16	54		0	0	0		0	0	0	0	0	0	0.08
3/22/2005	32	GNR1	41.48	31		0	0	0		0	0	0	0	0	0	1.94
2/18/2005	28	GNR1	39.73	27		0	0	0		0	0	0	0	0	0	0.77
1/21/2005	31	GNR1	25,118.59	25,018		0	0	0		0	0	0	0	0	0	0.00
Total for 2005:			88,389.83	72,403	0.00	0	0	0	0	0						2,009.43
12/21/2004	32	GNR1	35,631.76	36,160		0	0	0		0	0	0	0	0	0	0.00
11/19/2004	30	GNR1	24,954.87	28,043		0	0	0		0	0	0	0	0	0	0.00
10/20/2004	28	GNR1	4,686.41	5,679		0	0	0		0	0	0	0	0	0	0.00
9/22/2004	30	GNR1	12.06	2		0	0	0		0	0	0	0	0	0	0.00
8/23/2004	32	GNR1	10.99	0		0	0	0		0	0	0	0	0	0	0.00
7/22/2004	30	GNR1	10.31	0		0	0	0		0	0	0	0	0	0	0.00
6/22/2004	33	GNR1	11.34	0		0	0	0		0	0	0	0	0	0	0.00
5/20/2004	29	GNR1	9.96	0		0	0	0		0	0	0	0	0	0	0.00
4/21/2004	29	GNR1	9.99	0		0	0	0		0	0	0	0	0	0	0.00
3/23/2004	32	GNR1	35.93	32		0	0	0		0	0	0	0	0	0	0.00
2/20/2004	30	GNR1	29.34	20		0	0	0		0	0	0	0	0	0	0.00
1/21/2004	33	GNR1	19,502.28	20,772		0	0	0		0	0	0	0	0	0	0.00
Total for 2004:			84,905.24	90,708	0.00	0	0	0	0	0						0.00
12/19/2003	30	GNR1	24,185.59	27,185		0	0	0		0	0					
11/19/2003	28	GNR1	15,760.83	18,528		0	0	0		0	0	0	0	0	0	0.00
10/22/2003	29	GNR1	1,624.20	1,893		0	0	0		0	0	0	0	0	0	0.00

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